

OLC3 Ramona Expressway and Perris Boulevard Commercial Warehouse Project

Draft
Environmental Impact Report

SCH No. 2023040385

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Prepared for:

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Acronyms and Abbreviations

°C	degrees Celsius
ACC	Advanced Clean Cars
ACHP	Advisory Council on Historic Preservation
ACT	Advanced Clean Trucks
ADA	Americans with Disabilities Act
ADP	Area Drainage Plan
AEP	Association of Environmental Professionals
AFY	acre-feet per year
AGR	Agricultural Supply
AIA	Airport Influence Area
AICUZ	Air Installation Compatible Land Use Zone
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMI	Advanced Metering Infrastructure
AMSL	above mean sea level
AOZ	Airport Overlay Zone
A-P Act	Alquist-Priolo
APA	Administrative Procedure Act
APN	Assessor's Parcel Number
AQIA	Air Quality Impact Analysis
AQMP	Air Quality Management Plan
AST	Aboveground Storage Tanks
ASTM	American Society for Testing and Materials
ATP	Active Transportation Plan
BACM	Best Available Control Measures
BACT	Best Available Control Technology
Basin Plan	Santa Ana River Basin
BAU	business as usual
BC	black carbon
Bcf	billion cubic feet
BMP	best management practice
C ₂ H ₃ Cl	vinyl chloride
CA MUTCD	California Manual on Uniform traffic Control Devices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CadnaA	Computer Aided Noise Abatement
CAFÉ	Corporate Average Fuel Economy
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALFIRE	California Department of Forestry and Fire Protection
CALGAPS	California LBNL GHG Analysis of Policies Spreadsheet

Acronyms and Abbreviations (cont.)

CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources, Recycling, and Recovery
CalSTA	California State Transportation Agency
Caltrans	State Department of Transportation
CAP	Climate Action Plan
CAPSSA	Criteria Area Plant Species Survey area
CARB	California Air Resources Board
CARE CA	Californians Allied for a Responsible Economy
CCR	California Code of Regulations
CDFA	California Department of Food and Agriculture
CDFW	California Department of Fish and Wildlife
CEAP	Community Energy Action Plan
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation & Liability
CESA	California Endangered Species Act
CGS	California Geological Survey
CH ₄	methane
City	City of Perris
CIWMB	California Integrated Waste Management Board
CLI	California Legislative Information
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
COG	Council of Governments
COP	Conference of the Parties
County	Riverside County
CPEP	Clean Power and Electrification Pathway
CPUC	California Public Utilities Commission
CREC	Controlled Recognized Environmental Conditions
CRHR	California Register of Historical Resources
CTC	California Transportation Commission
CTR	California Toxics Rule
CTR	commute trip reduction
CUPA	Certified United Program Agency
CWA	Clean Water Act
CY	cubic yard
DAMP	Drainage Area Management Plan
dB	decibel
DBESP	Determination of Biologically Equivalent or Superior Preservation
DC	Design Conditions
DGE	diesel gallons equivalent
DIF	Development Impact Fee

Acronyms and Abbreviations (cont.)

DMV	Department of Motor Vehicle
DOE	Department of Energy
DOF	Department of Finance
DOPP	Database of Proposed Projects
DOSH	Division of Occupational Safety and Health
DPM	diesel particulate matter
DPR	Development Plan Review
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
EA	Energy Analysis
EDR	Environmental Database Reports
EG	electric generation
EIC	Eastern Information Center
EIR	Environmental Impact Report
EMD	Emergency Response Department
EMFAC	Emission Factor model
EMWD	Eastern Municipal Water District
EOR	enhanced oil recovery
EPA	Environmental Protection Agency
EPCA	Energy Policy and Conservation Act
EPCRA	Emergency Planning and Community Right-to-Know Act
ESGS	Earth Strata Geotechnical Services
EV	Electric vehicle
EWMD	Eastern Municipal Water District
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHSZV	Fire Hazard Severity Zone Viewer
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GCC	Global Climate Change
GGE	gross gasoline equivalents
GHG	greenhouse gas
GNG	Good Neighbor Guidelines
GO-Biz	Governor's Office of Business and Economic Development
GPD	gallons per day
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plans
GWh	gigawatt hours
GWP	global warming period
GWR	Groundwater Recharge
H ₂ S	hydrogen sulfide
HABS	Historic American Building Survey
HABS	Historic American Building Survey
HAER	Historic American Engineering Record

Acronyms and Abbreviations (cont.)

HANS	Habitat Evaluation and Acquisition Negotiation Strategy
HCP	Habitat Conservation Plan
HI	Hazard Index
HMTA	Hazardous Materials Transportation Act
HMTUSA	Hazardous Materials Transportation Uniform Safety Act
HRA	Health Risk Assessment
HREC	Historical Recognized Environmental Conditions
HSWA	Hazardous and Solid Waste Amendments
HVIP	Hybrid and Zero-Emission Truck and Bus Voucher Incentive Program
HVLP	high volume low pressure
HWCL	Hazardous Waste Control Law
I-	Interstate
IBank	Infrastructure and Economic Development Bank
IBC	International Building Code
IEPR	Integrated Energy Policy Report
IND	Industrial Supply
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Resource Planning
ISO	Independent Service Operator
ITE	Institute of Transportation Engineers
kWh	kilowatt hours
LBNL	Lawrence Berkley National Library
lbs/sf	pounds per square foot
LCFS	Low Carbon Fuel Standard
LCFS	Low Carbon Fuel Standard
L _{DN}	Day-Night Average Noise Level
LEED	Leadership in Energy and Environmental Design
LEV	Low-Emission Vehicle Program
LI	Light Industrial
LIP	Local Implementation Plans
LOS	level of service
LST	Localized Significance Threshold
MARB/IPA	March Air Reserve Base/Inland Port Airport
MATES	Multiple Air Toxics Exposure Study
MBTA	Migratory Bird Treaty Act
MD	medium-duty
MDP	Master Drainage Plan
MDP	Master Drainage Plan
MEIW	maximally exposed individual worker
MEP	Maximum Extent Practicable
mgd	million gallons per day
MHMP	Multi-Jurisdictional Hazard Mitigation Plan
MICR	maximum individual cancer risk
MLD	Most Likely Descendent

Acronyms and Abbreviations (cont.)

MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
Mpg	miles per gallon
Mph	miles per hour
MPO	Metropolitan Planning Organization
MS4	Municipal Separate Storm Sewer System
MSHCP	Multiple Species Habitat Conservation Plan
MT	metric ton
MUN	Municipal and Domestic Supply
MWD	Metropolitan Water District of Southern California
MWELo	Model Water Efficient Landscape Ordinance
MY	million years
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation
NAHC	National American Heritage Commission
NCCP	Natural Communities Conservation Plan
NDC	nationally determined contribution
NEPSSA	Narrow Endemic Plant Species Survey
NFIP	National Flood Insurance Program
NGV	Natural Gas Vehicle
NHTSA	National Highway Traffic and Safety Administration
NIOSH	National Institute for Occupational Safety and Health
NO	nitric oxide
NO ₂	nitrogen dioxide
NOP	Notice of Preparation
NO _x	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NPRBBD	North Perris Road and Bridge Benefit District
NPS	non-point source
NRHP	National Register of Historic Places
NTR	National Toxics Rule
O ₃	ozone
OAL	Office of Administrative Law
ODC	ozone depleting compound
OEHHA	Office of Environmental Health Hazard Assessment
OHP	Office of Historic Preservation
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Act
Pb	lead
PCBs	polychlorinated biphenyls
PCE	Passenger car equivalent
PDF	Project Design Features
PG&E	Pacific Gas and Electric

Acronyms and Abbreviations (cont.)

PM ₁₀	particulate 10 microns or less in diameter
PM _{2.5}	particulate 2.5 microns or less in diameter
PNMZ	Perris North Groundwater Management Zone
Ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PRIMMP	Paleontological Resource Impact Mitigation Monitoring Program
PROC	Industrial Process Supply
Project	OLC3 Ramona Expressway and Perris Boulevard Commercial Warehouse Project
PV	photovoltaic
PVCCSP	Perris Valley Commerce Center Specific Plan
PVMDP	Perris Valley Master Drainage Plan
PVSD	Perris Valley Storm Drain
RCDEH	Riverside County Department of Environmental Health
RCDWR	Riverside County Department of Waste Resources
RCFCWCD	Riverside County Flood Control and Water Conservation District
RCHCA	Riverside County Habitat Conservation Agency
RCRA	Resource Conservation and Recovery Act
RCTC	Riverside County Transportation Commission
REC1	Water Contact Recreation
REC2	Non-Contact Water Recreation
RECs	Recognized Environmental Conditions
REL	Reference Exposure Level
RPS	Renewable Portfolio Standard
RTA	Riverside Transit Agency
RTP	Regional Transportation Plan
RTPA	Regional Transportation Planning Agency
RV	Recreation Vehicle
RV	recreational vehicles
RWQCB	Regional Water Quality Control Board
RWRF	regional water reclamation facility
SAFE	Safer Affordable Fuel-Efficient
SARA	Superfund Amendments and Reauthorization Act
SCAB	South California Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCG	SoCal Gas
SCG	Strategic Growth Council
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDG&E	San Diego Gas and Electric
SFP	State Fully Protected
SGMA	Sustainable Groundwater Management Act
SHMA	Seismic Hazards Mapping Act

Acronyms and Abbreviations (cont.)

SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SKR	Stephens' Kangaroo Rat
SLCP	short-lived climate pollutants
SLF	Sacred Lands Files
SNUR	Significant New Use Rules
SO ₂	sulfur dioxide
SOON	Surplus Off-Road Opt-in for NO _x
SP	service populations
SR	State Route
SRA	Source Receptor Areas
STC	sound transmission class
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Regional Control Board
TAC	toxic air contaminant
TCM	Transportation Control Measure
TCP	traditional cultural place
TCP	Traditional Cultural Property
TCR	Tribal Cultural Resource
TDM	Transportation Demand Management
TDM	Transportation Demand Management
TEA	Transportation Equity Act
TMDL	Total Maximum Daily Load
TPM	Tentative Parcel Map
TRU	transportation refrigeration unit
TSCA	Toxic Substances Control Act
TUMF	Transportation Uniform Mitigation Fee
UBC	Uniform Building Code
UEG	United Engineering Group
UFP	ultrafine particle
UNFCCC	United Nations Framework Convention on Climate Change
URBEMIS	URBan EMISsions
USACE	U.S. Army Corps of Engineers
USC	United States Code
USDA	U.S. Department of Agriculture
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	Underground Storage Tanks
VHFSHZ	Very High Fire Hazard Severity Zone
VICS	Voluntary Interindustry Commerce Solution
VIP	Voucher Incentive Program
VMT	vehicle miles traveled
VOC	volatile organic compound

Acronyms and Abbreviations (cont.)

WARM	Warm Freshwater Habitat
WCI	Western Climate Institute
WDR	waste discharge requirement
WILD	Wildlife Habitat
WMI	Watershed Management Initiative
WRCOG	Western Riverside Council of Governments
WRRRA	Waste Reuse and Recycling Act
WSA	Water Supply Assessment
WSC	Western Science Center
YBP	years before present
ZE/NZE	zero emissions/net-zero emissions
ZEV	zero emission vehicles

1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

This Draft Environmental Impact Report (DEIR) has been prepared to inform decision-makers and the public of the potentially significant environmental effects associated with the project approvals for the (Project) in the City of Perris. This study has been prepared pursuant to the California Environmental Quality Act, known as CEQA, (California Public Resources Code Sections 21000 et seq.) and the Guidelines for Implementation of the Environmental Quality Act (State CEQA Guidelines) (California Code of Regulations, Sections 15,000, et seq.). The City of Perris is the Lead Agency for the proposed Project under CEQA and is responsible for the preparation of this DEIR.

1.2 PROJECT LOCATION

The Project site is in the City of Perris (City), in Riverside County (County), California, near the intersection of Ramona Expressway and North Perris Boulevard (see **Figure 3-1, Regional Location**, and **Figure 3-2, Project Location and Vicinity**). The Project site consists of approximately 45.1 acres and contains disturbed vacant land that was previously used for agricultural purposes. The Project site is bounded by Ramona Expressway to the south, North Perris Boulevard to the west, Perry Street to the north, and Redlands Avenue to the east. It is located approximately 1.7 miles east of Interstate (I-) 215 and approximately 6.4 miles south of State Route (SR) 60 and approximately 1.4 miles south of March Air Reserve Base/Inland Port Airport (MARB/IPA). The Project site is located within the MARB/IPA Airport Influence Area Boundary and the City's Airport Overlay Zone. The Project site is located almost entirely within Airport Compatibility Zone D (Flight Corridor Buffer) with a small portion of the site located within Zone C1 (Primary Approach/Departure Zone). The Project site is comprised of Assessor's Parcel Numbers (APN) 302-130-002, 302-130-008, 302-130-018, 302-130-021 through 302-130-024, and 302-130-027.

1.3 PROJECT SETTING

The Project site is generally flat with elevations ranging between 1,450 and 1,460 feet above mean sea level (amsl), with stormwater runoff flowing to the southeast. An existing drainage swale is located along the north side of Ramona Expressway (i.e., along the southern edge of the Project site), which is owned and maintained by the Riverside County Flood Control and Water Conservation District (RCFCWCD) and runs in an east-west direction connecting to the Perris Valley Storm Drain about 1,850 feet to the east.

The City of Perris is in the Perris Block geologic unit, which lies within the Peninsular Ranges Geomorphic Province of Southern California. The Peninsular Ranges Geomorphic Province is characterized by a series of northwesterly trending mountain ranges that extend from the coast of California eastward into the California desert and south to the tip of Baja California, Mexico. The Perris Block is bound on the northeast by the San Jacinto Fault, on the north by the Cucamonga Fault and the San Gabriel Mountains, and on the southwest by the Elsinore Fault and the Santa Ana Mountains. The City of Moreno Valley borders Perris to the north and the City of Menifee borders the City to the south. Unincorporated areas of Riverside County border the City to the east and west.

As shown on **Figure 3-3, Aerial Photograph**, land uses surrounding the Project site include a mix of undeveloped and developed land. Specifically, surrounding properties include undeveloped vacant land to the west, east, and south; commercial uses to the west and south; industrial and warehouse development to the north and east; and a gas station and commercial uses immediately adjacent to the southwest. A mobile home park occurs approximately 300 feet south of the Project site at the closest point, while a Recreational Vehicle (RV) park is located approximately 150 feet to the southeast, beyond the existing commercial uses southeast of the intersection of Ramona Expressway and North Perris Boulevard.

The Project site is located within the Mead Valley Area Plan of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The Project site is not located within any MSHCP Criteria Cell or designated conservation area, Core or Linkage area, Mammal Survey Area, or Amphibian Survey Area. However, the Project site is located within the MSHCP Criteria Area Species Survey Area, Narrow Endemic Plant Species Survey Area, and Burrowing Owl Survey Area.

The Project site is vacant and is primarily comprised of disturbed vegetation and habitat that is dominated by a low carpet of non-native grass and weeds. Native vegetation and habitats within Project site boundaries have been eliminated due to long-term disturbances associated with agricultural uses and weed abatement activities. The resulting site condition is heavily disturbed with compacted surface soils. One large detention basin is present in the western portion of the site, where wind-blown trash accumulates. The vacant Project site is used for illegal trash dumping. An abandoned water stack (i.e., agricultural water source) likely associated with previous agricultural uses is in the central portion of the Project site. A drainage ditch is located within the Project site, near the Project's southern property line, adjacent to Ramona Expressway.

Historical uses for the Project site were determined based on a review and evaluation of aerial photographs. Between 1938 and 1985, the Project site was undeveloped, vacant, and in a rural agricultural setting, with agricultural land uses occurring on most of the Project site in aerial photographs from 1949, 1953, and 1961. The detention basin located in the western portion of the site and the drainage ditch located in the southern portion of the site, along the north side of Ramona Expressway were first observed in a 1966 aerial photograph. The area surrounding the Project site began developing during this period, with residential, commercial, and industrial development. In a 1997 aerial photograph, the southwest corner of the Project site had been cleared and was being used as a staging area for a commercial development occurring at the intersection of North Perris Boulevard and Ramona Expressway. This portion of the site has remained disturbed since completion of the commercial development and is currently being used for trailer truck parking on a daily basis.

1.3.1 General Plan and Zoning Designations

The existing General Plan land use designation for the Project site is Perris Valley Commerce Center Specific Plan (PVCCSP) and the zoning is Commercial per the PVCCSP. Commercial land use designations are identified immediately to the west and south. Light Industrial uses are designated to the north, while Light Industrial and Commercial designations are located immediately to the east.

1.3.2 Perris Valley Commerce Center Specific Plan

On January 10, 2012, the City of Perris City Council adopted the PVCCSP, which was prepared pursuant to the authority granted to the City by California Government Code, Title 7, Division 1, Chapter 3, Article 8, Sections 65450 to 65457. On the same date, the City also adopted Ordinance No. 1284, adopting Specific Plan Zoning for properties within the PVCCSP area. The PVCCSP land uses allow for the development of approximately 3,500 acres which consist of industrial, commercial, and office uses, as well as public facilities. The PVCCSP has been subsequently amended 14 times, with Amendment No. 14 adopted in March 2023. In conjunction with its approval of the PVCCSP, the City complied with CEQA by preparing and certifying the Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (PVCCSP EIR) (State Clearinghouse No. 2009081086) (City of Perris 2011), which is incorporated by reference in this Draft EIR and is available for public review at the City of Perris Planning Division, 135 North D Street, Perris, California 92570.

1.4 PROJECT DESCRIPTION

The Project includes three primary components: (1) a 774,419-square-foot warehouse building that includes up to 20,000 square feet of ancillary office space and associated site improvements; (2) a 4.7-acre commercial portion to the south of the warehouse building proposed for retail and restaurant uses; and (3) a 4.8-acre commercial portion to the west of the warehouse building proposed for future retail and restaurant uses. These three Project components collectively encompass approximately 46 acres of site area. Unless otherwise noted, the analysis presented in Sections 4.1 through 4.14 of this Draft EIR addresses the entire Project including potential future retail and restaurant development on the two commercial portions of the Project site. Distinctions between impacts from construction and operation of the buildings are made pertinent to the topical issue.

1.4.1 Discretionary Actions and Approvals

Pursuant to the provisions of CEQA and the State CEQA Guidelines, the City of Perris, as the Lead Agency, is charged with the responsibility of deciding whether to approve the Project. As identified above, the following permits and discretionary actions are required by the City of Perris to implement the proposed Project:

- **Development Plan Review DPR 22-00006** for the warehouse and southern commercial site plan and building elevations;
- **Certification of an EIR** with the determination that the EIR has been prepared in compliance with the requirements of CEQA;
- **Tentative Parcel Map No. 05048** to re-subdivide the existing eight-parcel Project site into seven parcels (subject to change as noted above); and
- **Specific Plan Amendment** to amend the PVCCSP to change a portion of the site's zoning to Light Industrial, which includes warehouse facilities as a permitted use.

Other non-discretionary actions anticipated to be taken by the City at the staff level for the proposed Project include:

- Review and approval of all off-site infrastructure plans, including street and utility improvements pursuant to the conditions of approval;
- Review of all plans, including grading and on-site utilities; and
- Approval of a Preliminary Water Quality Management Plan to mitigate 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) to ensure that construction site drainage velocities are equal to or less than the pre-construction conditions and downstream water quality is not worsened;
- A determination by the **Riverside County Airport Land Use Commission** (ALUC);
- Compliance with the **South Coast Air Quality Management District** Indirect Source Rule (Rule 2305) for warehouse owners and operators;
- Approval of Water Supply Assessment and water and sewer improvement plans by the **Eastern Municipal Water District**; and
- Permits or associated approval by other utility agencies as necessary, for installation of new utility infrastructure or connections to existing facilities.

1.4.2 Project Alternatives

One of the most important aspects of the environmental review process is the identification and assessment of reasonable alternatives that have the potential for avoiding or minimizing the significant impacts of a proposed project. The State CEQA Guidelines (Section 15126(d)) emphasizes the selection of a reasonable range of technically feasible alternatives and adequate assessment of these alternatives to allow for a comparative analysis and consideration by decision-makers. The State CEQA Guidelines state that the discussion of alternatives shall focus on alternatives capable of eliminating or reducing significant adverse environmental effects of a proposed project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. The range of alternatives required in an EIR is governed by a “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.

Of the alternatives considered, the EIR needs to examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. Pursuant to CEQA, “feasible” has been defined as “...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.”

As described in Sections 4.1 through 4.14 of this EIR, the potentially significant impacts of the Project can be mitigated to a less than significant level except for cumulative air quality impacts during operation and cumulative greenhouse gas (GHG) emissions impacts.

The alternatives considered in this EIR to address these impacts include the following:

- Alternative 1 – No Project/No Development

Under the No Project/No Development Alternative, the proposed development of a warehouse building, commercial retail/restaurant uses, and associated parking, access driveways, utilities, and landscaping would not occur. The Project site would remain in its current condition and remain vacant.

- Alternative 2 – No Project—All Commercial Development

Under this alternative, the warehouse building would not be built. The commercial/retail area uses would increase from 70,000 square feet with the Project to 982,278 square feet. The commercial retail area would include 520,278 square feet of shopping space, 40,000 square feet of market space, 343,000 square feet of restaurant space, 55,000 square feet of fast-food space, a 6,000-square-foot gas station/convenience center, and a 18,000-square-foot gas station/convenience center/car wash.

- Alternative 3 – Reduced Industrial

Under this alternative, the warehouse building would be reduced by approximately 20 percent from 774,419 square feet to approximately 620,000 square feet, a reduction of approximately 154,419 square feet. Under this alternative, the assumptions regarding the warehouse being non-refrigerated would remain the same. The proposed commercial retail/restaurant use areas to the south and to the west, totaling 70,000 square feet would remain as proposed.

- Alternative 4 – Reduced Commercial

Under this alternative, the southern commercial retail building square footage would be reduced from 45,000 square feet to 23,308 square feet. The number of commercial retail/restaurant use buildings on the southern commercial site would be reduced from four buildings to three buildings, with a total square footage of 23,308 square feet. The proposed 25,000-square-foot western commercial retail/restaurant use area and the 774,419-square-foot industrial warehouse building would remain as proposed.

CEQA requires the identification of an environmentally superior alternative. Section 15126.6(e)(2) of the State CEQA Guidelines states that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

The No Project/No Development Alternative has the least impact to the environment because it would not involve any construction activities of industrial or commercial operations. While this alternative would avoid the significant effects of the Project, it would not be consistent with the City's General Plan or PVCCSP, which anticipates development of the Project site, resulting in a potentially significant land use impact. Additionally, none of the Project objectives would be met.

The No Project–All Commercial Alternative may increase operational noise impacts due to the addition of a car wash and due to an increase in total daily trips. Therefore, the No Project–All Commercial Alternative would not be the environmentally superior alternative.

Regarding the remaining development alternatives, the Reduced Industrial Alternative is environmentally superior to the Project, the No Project–All Commercial Development Alternative, and the Reduced Commercial Alternative. The Reduced Industrial Alternative would result in approximately 328 less daily trips than the Project, 58 less industrial truck trips, and 270 less industrial car trips. While the Reduced Industrial Alternative and the Reduced Commercial Alternative would both lessen impacts to air quality, energy, greenhouse gas emission, noise, and transportation, the Reduced Industrial Alternative would have a greater reduction in building square footage, which is assumed to further reduce the impacts compared to the Reduced Commercial Alternative. However, under the Reduced Industrial Alternative, the Reduced Commercial Alternative, and the No Project–All Commercial Development Alternative, operational air quality and GHG impacts would remain significant and unavoidable.

1.5 AREAS OF CONTROVERSY

State CEQA Guidelines Section 15123(b)(2) requires the Lead Agency (City of Perris) to identify any known issues of controversy in the Executive Summary.

In compliance with Section 15201 of the State CEQA Guidelines, the City of Perris has taken steps to provide opportunities for public participation in the initial environmental review process. As noted above, on July 8, 2022 the first Project NOP was filed at the Riverside County Clerk’s Office. The City also distributed the first NOP to 49 federal, state, regional, and local government agencies and interested parties for a 30-day public review period to solicit comments and to inform agencies and the public of the Project. The first NOP comment period began on July 8, 2022 and ended on August 8, 2022. A public scoping meeting was held during a Planning Commission Meeting on July 20, 2022. A second Project NOP was filed at the Riverside County Clerk’s office on April 14, 2023 and was distributed to the SCH for transmittal to state agencies for review. The second NOP comment period began on April 14, 2023 and ended May 20, 2023. The City received four responses to the first NOP and received two responses to the second NOP.

The Lead Agency has identified some issues of controversy associated with the Project after consideration of all comments received in response to the NOP. The issues of controversy are:

- Physical improvements to off-site and adjacent private property associated with storm drain extensions or other off-site utility improvements;
- Potential air quality or health risk effects of the warehouse and truck operations;
- Truck traffic on streets; and
- The conversion of part of the site from commercial to light industrial zoning.

Regarding issues to be resolved, this Draft EIR addresses the environmental issues that are known by the City, issues that were identified in the comment letters that the City received in response to the Project NOP (refer to Appendix A of this Draft EIR for NOP responses), and comments received during the EIR scoping meeting.

1.6 SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS

Table 1-1 – DEIR Impact Summary Matrix, below, provides a summary of impacts related to the proposed Project. The table identifies significant environmental impacts resulting from the Project pursuant to the State CEQA Guidelines Section 15123(b)(1).

1.7 REFERENCES

City of Perris. 2011. Perris Valley Commerce Center Specific Plan Final Environmental Impact Report. November 2011, certified January 10, 2012. Available at:
<https://www.cityofperris.org/Home/ShowDocument?id=2645>.

Table 1-1 – DEIR IMPACT SUMMARY MATRIX

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Aesthetics	Have a substantial adverse effect on a scenic vista.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Aesthetics	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	No impact.
Aesthetics	In non-urbanized areas, substantially degrades 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?	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Aesthetics	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	PVCCSP MM Haz 3: Any outdoor lighting installed shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane.	Less than significant.

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
		PVCCSP MM Haz 5: The following uses shall be prohibited: (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. (d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation. (e) All retention and water quality basins shall be designed to dewater within 48 hours of a rainfall event.	
		Project-specific MM AES-1: Prior to the issuance of grading permits, the Property Owner/Developer shall provide evidence to the City that the Contractor Specifications require that any temporary nighttime lighting installed during construction for security or any other purpose shall be downward facing and hooded or shielded to prevent security light from spilling outside the staging area or from directly broadcasting security light into the sky, or onto adjacent properties. Compliance with this measure shall be verified by the City of Perris Building Division during construction.	

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Air Quality	Conflict with or obstructing of implementation of the applicable air quality plan.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Air Quality	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 ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	Project-specific MM AQ-1: Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas of the warehouse portion of the Project that identify applicable CARB anti-idling regulations. At a minimum, each sign shall include: (1) instructions for truck drivers to shut off engines when not in use; (2) instructions for drivers of diesel trucks to restrict idling to no more than five minutes once the vehicle is stopped, the transmission is set to “neutral” or “park,” and the parking brake is engaged; and (3) telephone numbers of the building facilities manager and CARB to report violations. Prior to the issuance of an occupancy permit, the City Public Works Department shall conduct a site inspection to ensure that the signs are in place.	Significant and unavoidable.
		Project-specific MM AQ-2: Prior to the issuing of each building permit, the project proponent shall provide plans and specifications to the City of Perris Building Department that demonstrate that each Project building is designed for passive heating and cooling and is designed to include natural light. Features designed to achieve this shall include the proper placement of windows, overhangs, and skylights.	
		Project-specific MM AQ-3: Prior to the issuing of each building permit, the Project proponent shall provide plans and specifications to the City of Perris Building Department that demonstrate that electrical service is provided to each of the areas in the vicinity of the building that are to be landscaped in order that electrical equipment may be used for landscape maintenance.	
		Project-specific MM AQ-4: Once constructed, the Project proponent shall ensure that all building tenants shall utilize electric equipment for landscape maintenance to the extent feasible through requirements in the lease agreements. This aspect of the lease agreements shall be reviewed and verified by the City of Perris Planning Division.	

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
		Project-specific MM AQ-5: Once constructed, the Project proponent shall ensure that all building tenants in the warehouse portion of the Project shall utilize only electric or natural gas service yard trucks (hostlers), pallet jacks and forklifts, and other onsite equipment, through requirements in the lease agreements. Electric-powered service yard trucks (hostlers), pallet jacks and forklifts, and other onsite equipment shall also be required instead of diesel-powered equipment, if technically feasible. Yard trucks may be diesel fueled in lieu of electrically or natural gas fueled provided such yard trucks are at least compliant with CARB 2010 standards for on-road vehicles or CARB Tier 4 compliant for off-road vehicles.	
		Project-specific MM AQ-6: Upon occupancy, the facility operator for the warehouse portion of the Project shall require tenants that do not already operate 2010 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, SmartWay Finance, or other similar funds. If awarded, the tenant shall be required to accept and use the funding. Tenants shall be encouraged to consider the use of alternative fueled trucks as well as new or retrofitted diesel trucks. Tenants shall also be encouraged to become SmartWay Partners, if eligible. This measure shall not apply to trucks that are not owned or operated by the facility operator or facility tenants since it would be infeasible to prohibit access to the site by any truck that is otherwise legal to operate on California roads and highways. The facility operator shall provide an annual report to the City of Perris Planning Division. The report shall: (1) list each engine design; (2) describe the effort made by each tenant to obtain funding to upgrade their fleet and the results of that effort; and (3) describe the change in each fleet composition from the prior year.	

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
		Project-specific MM AQ-7: Tenants who employ 250 or more employees on a full- or part-time basis shall comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. The purpose of this rule is to provide employees with a menu of options to reduce employee commute vehicle emissions. Tenants with less than 250 employees or tenants with 250 or more employees who are exempt from SCAQMD Rule 2202 (as stated in the Rule) shall either (a) join with a tenant who is implementing a program in accordance with Rule 2202 or (b) implement an emission reduction program similar to Rule 2202 with annual reporting of actions and results to the City of Perris. The tenant-implemented program shall include, but not be limited to the following: • Appoint a Transportation Demand Management (TDM) coordinator who will promote the TDM program, activities, and features to all employees; • Create and maintain a “commuter club” to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work; • Inform employees of public transit and commuting services available to them (e.g., social media, signage); • Provide on-site transit pass sales and discounted transit passes; • Guarantee a ride home; • Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted; and • Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.	
		Project-specific MM AQ-8: Prior to the issuance of a building permit, the Project proponent shall provide evidence to the City that loading docks are designed to be compatible with SmartWay trucks.	

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
		Project-specific MM AQ-9: Upon occupancy and annually thereafter, the facility operator shall provide information to all tenants, with instructions that the information shall be provided to employees and truck drivers as appropriate, regarding: • Building energy efficiency, solid waste reduction, recycling, and water conservation; • Vehicle GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting; • Participation in the Voluntary Interindustry Commerce Solutions (VICS) “Empty Miles” program to improve goods trucking efficiencies; • Health effects of diesel particulates, State regulations limiting truck idling time, and the benefits of minimized idling; and • The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity.	
		Project-specific MM AQ-10: Prior to issuance of a building permit, the Project proponent shall provide the City with an onsite signage program that clearly identifies the required onsite circulation system. This shall be accomplished through posted signs and painting on driveways and internal roadways.	
		Project-specific MM AQ-11: Prior to issuance of an occupancy permit, the City shall confirm that signs clearly identifying approved truck routes have been installed along the truck routes to and from the Project site.	
		Project-specific MM AQ-12: Prior to issuance of an occupancy permit, the Project proponent shall install a sign on the property with telephone, email, and regular mail contact information for a designated representative of the tenant who would receive complaints about excessive noise, dust, fumes, or odors. The sign shall also identify contact data for the City for perceived Code violations. The tenant’s representative shall keep records of any complaints received and actions taken to communicate with the complainant and resolve the complaint. The tenant’s representative shall endeavor to resolve complaints within 24 hours.	

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
		Project-specific MM AQ-13: Prior to issuance of a building permit, the Project proponent shall provide the City with Project specifications, drawings, and calculations that demonstrate that main electrical supply lines and panels have been sized to support heavy truck charging facilities when these trucks become available. The calculations shall be based on reasonable predictions from currently available truck manufacturer's data. Electrical system upgrades that exceed reasonable costs shall not be required.	
Air Quality	Expose sensitive receptors to substantial pollutant concentration.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Air Quality	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Biological Resources	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 the U.S. Fish and Wildlife Service.	Project-specific 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 the Project shall be avoided, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species (generally February 1 to September 15 although the nesting season may be extended due to weather and drought conditions). If site-preparation activities are proposed during the nesting/breeding season, the Project proponent shall retain a qualified biologist to conduct a pre-activity field survey prior to the issuance of grading permits for the 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 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, the biologist shall immediately establish a conservative avoidance buffer surrounding the nest based on their best professional judgement and experience. The biologist shall monitor	Less than significant.

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
		the nest at the onset of Project activities, and at the onset of any changes in such Project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the biologist determines that such Project activities may be causing an adverse reaction, the biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers will be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The on-site qualified biologist will review and verify compliance with these nesting avoidance buffers and will verify the nesting effort has finished. • Work can resume within these avoidance areas when no other active nests are found. Upon completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to the City of Perris Planning Division for mitigation monitoring compliance record keeping.	
		Project-specific MM BIO-2: The Project proponent shall retain a qualified biologist to conduct a pre-construction survey for resident burrowing owls within 30 days prior to commencement of grading and construction activities on the Project site. The survey shall include the Project site and all suitable burrowing owl habitat within a 500-foot buffer. The results of the survey shall be submitted to the City of Perris Planning Division prior to obtaining a grading permit. In addition, if burrowing owls are observed during the MBTA nesting bird survey, to be conducted within three days prior to ground disturbance or vegetation clearance, the observation shall be reported to the Wildlife Agencies. 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 will be conducted in accordance with the current Burrowing Owl Survey Instructions for the Western Riverside MSHCP.	

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
		- If burrowing owls are detected, the CDFW shall be sent written notification by the City within three days of detection of burrowing owls. If active nests are identified during the pre-construction survey, the nests shall be avoided and the qualified biologist and Project proponent shall coordinate with the City of Perris Planning Division, the USFWS, and the CDFW to develop a Burrowing Owl Plan to be approved by the City in consultation with the CDFW and the USFWS prior to commencing Project activities. The Burrowing Owl Plan shall be prepared in accordance with guidelines in the CDFW Staff Report on Burrowing Owl (March 2012) and the MSHCP. The Burrowing Owl Plan shall describe proposed avoidance, minimization, relocation, and monitoring as applicable. The Burrowing Owl Plan shall include the number and location of occupied burrow sites and details on proposed buffers if avoiding the burrowing owls and/or information on the adjacent or nearby suitable habitat available to owls for relocation. - If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls may also be required in the Burrowing Owl Plan. The Project proponent shall implement the Burrowing Owl Plan following CDFW and USFWS review and concurrence. A final letter report shall be prepared by the qualified biologist documenting the results of the Burrowing Owl Plan. The letter shall be submitted to the CDFW prior to the start of Project activities. When the qualified biologist determines that burrowing owls are no longer occupying the Project site per the criteria in the Burrowing Owl Plan, Project activities may begin. - If burrowing owls occupy the Project site after Project activities have started, then construction activities shall be halted immediately. The Project proponent shall notify the City of Perris Planning Division and the City shall notify the CDFW and the USFWS within 48 hours of detection. A Burrowing Owl Plan, as detailed above, shall be implemented.	

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
		Project-specific MM BIO-3: Prior to commencement of ground-disturbing activities (i.e., earthwork, clearing, and/or grubbing), wet season focused surveys for federally listed fairy shrimp species shall be completed. The wet season surveys shall be conducted by a permitted biologist and follow the current USFWS survey protocol for large brachiopods (USFWS 2017). Survey results shall be submitted to USFWS following completion of the surveys. If listed fairy shrimp species are not detected during the wet season surveys, then ground-disturbing activities shall be allowed to commence on the Project site and no further mitigation is required. If federally listed fairy shrimp are identified during the wet season surveys and the project cannot avoid occupied habitat, a DBESP assessment shall be completed to ensure that the proposed alternative provides for replacement of any lost functions and values of habitat. Project impacts to occupied listed fairy shrimp habitat shall be accomplished through purchase of off-site mitigation credits at an agency-approved mitigation bank or in-lieu fee program, or through purchase of off-site land that supports occupied habitat at a ratio of no less than 2:1. If off-site land is purchased, the mitigation site shall be preserved in perpetuity through a conservation easement, deed restriction, or similar legal protection mechanism.	
Biological Resources	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	No Impact.
Biological Resources	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal) through direct removal, filling, hydrological interruption, or other means.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	No impact.

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Biological Resources	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or establish native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	No Impact.
Biological Resources	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	No Impact
Biological Resources	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan.	Project-specific MM BIO-2	Less than significant.
Cultural Resources	Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	Project-specific MM CUL-1: Prior to the issuance of grading permits, the Project Applicant 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) to create and implement a Project-specific controlled grading plan for monitoring site grading/earthmoving activities in the vicinity of the earthen reservoir. 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 Project site or within the off-site Project improvement areas until the archaeologist has been approved by the City. A report of findings, including an itemized inventory of artifacts, shall be prepared upon completion of the grading of the earthen reservoir. 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, and the Eastern Information Center (EIC).	Less than significant.
Cultural Resources	Cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5.	Project-specific MM CUL-2: Prior to the issuance of grading permits, the Project Applicant 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	Less than significant.

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
		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. If 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, except for human remains and related grave goods or sacred/ceremonial/religious objects, belong to the property owner. The property owner shall 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	

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
		the City of Perris Planning Division, the Soboba Band of Luiseño Indians, the Pechanga Band of Luiseño Indians, and the Rincon Band of Luiseño Indians. A designated Native American representative from either the Soboba Band of Luiseño Indians, the Pechanga Band of Luiseño Indians, or the Rincon Band of Luiseño Indians shall be retained to assist the Project archaeologist in the significance determination of the Native American resources as deemed possible. The designated 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 tribe. • If the find is determined to be of sacred or religious value, the tribal representative will work with the City and consulting archaeologist to protect the resource in accordance with tribal requirements. All analysis will be undertaken in a manner that avoids destruction or other adverse impacts. If human remains are discovered at the Project site or within the off-site Project improvement areas, mitigation measure MM CUL-3 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 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 cannot be avoided or relocated at the Project site shall be prepared for curation at an accredited curation facility in Riverside County that meets federal standards (per 36 CFR Part 79) and available to archaeologists/researchers for further study. The Project archaeologist shall deliver the Native American artifacts, including title, to the identified curation facility within a reasonable amount of	

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
		time, along with applicable fees for permanent curation. Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. After 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 tribe(s) involved with the Project.	

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Cultural Resources	Disturb any human remains, including those interred outside of dedicated cemeteries.	Project-specific MM CUL-3: If 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(s) shall immediately stop all activities within 100 feet of the find. The Project Applicant 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 of any Luiseño tribal representative(s) at the site, the NAHC identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of the Native American human remains and may recommend to the Project Applicant 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 Applicant and the MLD. If there is disagreement regarding the disposition of the remains, State law will apply and median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98(e) and 5097.94(k)). The specific locations of Native American burials and reburials would be proprietary and not disclosed to the public. The locations would be documented by the consulting archaeologist in conjunction with the various stakeholders and a report of findings shall be filed with the Eastern Information Center (EIC).	Less than significant.

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Energy	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	PVCCSP MM Air 19: 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.	Less than significant.
		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 implementation of the development project with building plans and calculations.	
Energy	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	PVCCSP MM Air 19 and PVCCSP MM Air 20	Less than significant.
Geology and Soils	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 Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	No impact.
Geology and Soils	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Geology and Soils	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including liquefaction.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Geology and Soils	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving landslides.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	No impact.
Geology and Soils	Result in substantial soil erosion or the loss of topsoil.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Geology and Soils	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 offsite landslide, lateral spreading, subsidence, liquefaction, or collapse.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Geology and Soils	Be located on expansive soil, as defined in Table 18-I-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	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.	Less than significant.
Geology and Soils	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.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	No impact.
Geology and Soils	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	PVCCSP MM GEO-1: Prior to the issuance of grading permits, the Project Applicant shall submit to and receive approval from the City of Perris Planning Division, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The PRIMMP shall include the provision of a qualified professional paleontologist (or his or her trained paleontological monitor representative) during all onsite and offsite subsurface excavation in the western portion of the Project site and all onsite and offsite subsurface excavation in the eastern portion of the site that exceeds 5 feet in depth below the pre-grade surface. The PRIMMP shall also include provisions for a Worker's Environmental Awareness Program (WEAP) training that communicates requirements and	Less than significant.

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
		procedures for the inadvertent discovery of paleontological resources during construction, to be delivered by the paleontological monitor to the construction crew prior to the onset of ground disturbance. Selection of the paleontologist shall be subject to approval of the City of Perris Planning Manager and no grading activities shall occur at the Project site or within offsite Project improvement areas until the paleontologist has been approved by the City. Monitoring shall be restricted to undisturbed subsurface areas of older Quaternary alluvium, which might be present below the surface. The 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.	
Greenhouse Gas Emissions	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Project-specific MM AQ-1 through AQ-13	Significant and unavoidable.
Greenhouse Gas Emissions	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Hazards & Hazardous Materials	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Hazards & Hazardous Materials	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.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Hazards & Hazardous Materials	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 1-quarter mile of an existing or proposed school.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	No impact.
Hazards & Hazardous Materials	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.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	No impact.
Hazards & Hazardous Materials	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.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Hazards & Hazardous Materials	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	No impact.
Hazards & Hazardous Materials	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	No impact.
Hydrology & Water Quality	Violate any water quality standards or waste discharge requirements.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Hydrology & Water Quality	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Hydrology & Water Quality	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.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Hydrology & Water Quality	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 off-site.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Hydrology & Water Quality	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.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Hydrology & Water Quality	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.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Hydrology & Water Quality	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to provide inundation.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	No impact.
Hydrology & Water Quality	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Land Use	Physically divide an established community.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	No impact.
Land Use	Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant impact.
Noise	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in local general plan or noise ordinance, or applicable standards of other agencies.	PVCCSP Noise 1: During all project site excavation and grading on-site, the construction contractors shall equip all construction equipment, fixed or mobile, shall be equipped with [sic] properly operating and maintained mufflers consistent with manufacturer's 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.
Noise	Generation of excessive ground-borne vibration or ground-borne noise levels.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Noise	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.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Transportation	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	PVCCSP 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.	Less than significant.

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
		PVCCSP 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 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, Development Impact Fee (DIF), 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.	
		PVCCSP 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 future provision of bus routing in the project area that would require bus stops at the project access points. If the RTA has plans for the establishment of a bus route that will 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 Trans 5: Bike racks shall be installed in all parking lots in compliance with City of Perris standards.	

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
		PVCCSP Trans 7: Implementing project-level traffic studies shall be required for all subsequent implementing development proposals within the boundaries of the PVCC as approved by the City of Perris Engineering Department. These subsequent traffic studies shall identify specific project deficiencies 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.	
		PVCCSP Trans 8: Proposed mitigation measures resulting from project-level traffic studies shall be coordinated with the NPRBBD to ensure that they are in conformance with the ultimate improvements planned by the NPRBBD. The applicant shall be eligible to receive proportional credits against the NPRBBD for construction of project level mitigation that is included in the NPRBBD.	
Transportation	Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Transportation	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	PVCCSP Air 2 PVCCSP Trans 1 PVCCSP Trans 2	Less than significant.
Transportation	Result in inadequate emergency access.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	No impact.

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Tribal Cultural Resources	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 California 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).	Project-specific MM CUL-2 Project-specific MM CUL-3	Less than significant.
Tribal Cultural Resources	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 California 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Project-specific MM CUL-2 Project-specific MM CUL-3	Less than significant.

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Utilities & Service Systems	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.	PVCCSP MM Air 19 and PVCCSP MM Air 20	Less than significant.
Utilities & Service Systems	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.	PVCCSP MM Air 19 and PVCCSP MM Air 20	Less than significant.
Utilities & Service Systems	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.	PVCCSP MM Air 19 and PVCCSP MM Air 20	Less than significant.
Utilities & Service Systems	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.	PVCCSP MM Air 19 and PVCCSP MM Air 20	Less than significant.
Utilities & Service Systems	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	PVCCSP MM Air 19 and PVCCSP MM Air 20.	Less than significant.

2.0 INTRODUCTION

2.1 PURPOSE OF THE EIR

This Draft Environmental Impact Report (EIR) has been prepared to evaluate the potential environmental impacts associated with the construction and operation of the proposed OLC3 Ramona Expressway and Perris Boulevard Commercial Warehouse Project (Project). The Project involves the construction and operation of an industrial warehouse building with ancillary office uses on an approximately 36-acre portion of the 45.1-acre Project site, as well as future development of commercial retail/restaurant uses within two commercial portions of the Project site including an approximately 4.7-acre portion to the south of the proposed warehouse and an approximately 4.8-acre portion to the west of the proposed warehouse. The Project would also provide associated on-site parking, landscaping, and roadway and infrastructure improvements in conjunction with the warehouse and future retail/restaurant uses. The City of Perris is the lead agency for the Project under the California Environmental Quality Act (CEQA) and is responsible for preparing the EIR. The determination that the City of Perris is the “lead agency” is made in accordance with Sections 15051 and 15367 of the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines), which define the lead agency as the public agency that has the principal responsibility for carrying out or approving a project.

This Draft EIR is an informational document prepared by the City of Perris for the following purposes:

- To satisfy the requirements of CEQA (California Public Resources Code, Sections 21000–21178) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 14, Sections 15000–15387).
- To inform the public, the local community, and responsible and interested public agencies of the scope of the Project and to describe the potential environmental effects, measures to mitigate significant effects, and alternatives to the Project.
- To enable the City to consider environmental consequences when deciding whether to approve the Project.
- To serve as a source document for responsible agencies to issue permits and approvals, as required, for development of the Project.

As described in CEQA and the State CEQA Guidelines, public agencies are charged with the duty of avoiding or substantially lessening significant environmental effects, where feasible. In satisfying this duty, a public agency has an obligation to balance the project’s significant effects on the environment with its benefits, including economic, social, technological, legal, and other benefits. The lead agency is required to consider the information in the EIR, along with any other relevant information, in making its decisions on the Project. Although the EIR does not determine the ultimate decision that will be made regarding approval of a project, CEQA requires the City to consider the information in the EIR and make findings regarding each significant and unavoidable effect identified in the EIR. The City will review and consider certification of the Final EIR prior to any decision on whether to approve the proposed Project.

This Draft EIR has been prepared utilizing information from City planning and environmental documents, technical studies prepared for the Project, and other publicly available data. As permitted under the State CEQA Guidelines (Section 15084[d–e]), this Draft EIR has been prepared by a consultant under the direction of City planning staff. However, prior to certification, the City is undertaking an independent review of this Draft EIR by having City planning staff work with the consultant on the EIR and by employing a third-party consultant to independently review the EIR. If certified by the City, the information included, and the conclusions reached in the EIR, will, therefore, represent the City's independent judgment regarding the potential environmental impacts of the Project.

2.2 EIR PROCESS

A first Notice of Preparation (NOP) was prepared and circulated by the City of Perris to identify those aspects of the proposed Project that, either individually or cumulatively, may cause a significant adverse effect on the physical environment. The first Project NOP is included in Appendix A of this Draft EIR. Pursuant to State CEQA Guidelines Section 15060(d), the City did not prepare an Initial Study for the Project, but instead determined that preparation of an EIR would be necessary for CEQA compliance based on the nature and scope of the proposed development. More specifically, State CEQA Guidelines Section 15060(d) states “[i]f the lead agency can determine that an EIR will be clearly required for a project, the agency may skip further initial review of the project and begin work directly on the EIR process described in Article 9, commencing with Section 15080. In the absence of an initial study, the lead agency shall still focus the EIR on the significant effects of the project and briefly indicate its reasons for determining that other effects would not be significant or potentially significant.”

Accordingly, the first NOP indicated that this EIR should focus its analysis on 14 environmental subject areas listed below in Subsection 2.4.3. The City filed the first NOP with the Riverside County Clerk's Office for a 30-day public review period, which began on July 8, 2022. The City of Perris received written comments on the scope of the EIR during those 30 days, which have been considered by the City in the preparation of this EIR. The City held an EIR scoping meeting open to the interested public agencies and members of the public during its regularly scheduled Planning Commission hearing on July 20, 2022.

A second Project NOP was filed at the Riverside County Clerk's office on April 14, 2023 and was distributed to the SCH for transmittal to state agencies for review. The second NOP comment period began on April 14, 2023 and ended May 20, 2023. The second Project NOP is also included in Appendix A of this Draft EIR.

This Draft EIR is being circulated for review and comment by the public and other interested parties, agencies, and organizations for a 45-day review period. Prior to the start of the 45-day public review period, public notices announcing availability of the Draft EIR will be mailed to interested parties, and copies of the Draft EIR and its Technical Appendices will be available for review at the locations indicated in the public notices.

After the close of the 45-day Draft EIR public comment period, the City will prepare and publish responses to written comments received on the environmental effects of the proposed Project. The Final EIR will be reviewed by the City of Perris Planning Commission, which will then provide its recommendation regarding certification of the EIR to the Perris City Council. Certification of the Final EIR would be accompanied by the adoption of written findings and a statement of overriding considerations for any significant unavoidable environmental impacts identified in the Final EIR. In addition, the City must adopt a Mitigation, Monitoring, and Reporting Program (MMRP), which describes the process to

ensure implementation of the mitigation measures identified in the Final EIR. The MMRP will ensure CEQA compliance during Project construction and operation.

2.3 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

State CEQA Guidelines Section 15123(b)(2) requires the lead agency (City of Perris) to identify any known issues of controversy in the Executive Summary. The lead agency has identified some issues of controversy associated with the Project after consideration of all comments received in response to the NOP. The Issues of controversy are:

- Physical improvements to off-site and adjacent private property associated with storm drain extensions or other off-site utility improvements;
- Potential air quality or health risk effects of the warehouse and truck operations;
- Truck traffic on streets; and
- The conversion of part of the site from commercial to light industrial zoning.

Regarding issues to be resolved, this Draft EIR addresses the environmental issues that are known by the City, issues that were identified in the comment letters that the City received in response to the Project NOP (refer to Appendix A of this Draft EIR for NOP responses), and comments received during the EIR scoping meeting. Items raised in written comment to the NOP are summarized in **Table 2-1, Summary of NOP and Scoping Meeting Comments**, below.

2.4 ALTERNATIVES TO THE PROPOSED PROJECT

In compliance with State CEQA Guidelines Section 15126.6, an EIR must describe a range of reasonable alternatives to 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. A brief description of the alternatives to the Project considered in this EIR is provided below; a detailed description of each alternative evaluated in this EIR, as well as an analysis of the potential environmental impacts associated with each alternative, is provided in EIR Section 5.0, *Alternatives*, of this Draft EIR. Also described in Section 5.0 is a list of alternatives that were considered but rejected from further analysis.

No Project Alternative

Under the No Project/No Development Alternative, the proposed development of a warehouse building, commercial retail/restaurant uses, and associated parking, access driveways, utilities, and landscaping would not occur. The Project site would remain in its current condition and remain vacant.

No Project–All Commercial Development Alternative

Under this alternative, the warehouse building would not be built. The commercial/retail area uses would increase from 70,000 to 982,278 square feet. The commercial retail area would include 520,278 square feet of shopping space, 40,000 square feet of market space, 343,000 square feet of

restaurant space, 55,000 square feet of fast-food space, a 6,000 square feet gas station/convenience center, and 18,000 square feet gas station/convenience center/car wash.

Reduced Industrial Alternative

Under the Reduced Industrial Alternative, the proposed warehouse building would be reduced by approximately 20 percent from 774,419 square feet to approximately 620,000 square feet, a reduction of approximately 154,419 square feet. Under this alternative, the assumptions regarding the warehouse being non-refrigerated would remain the same. The proposed commercial retail/restaurant use areas to the south and to the west, totaling 70,000 square feet would remain as proposed.

Reduced Commercial Alternative

Under the Reduced Commercial Alternative, the number of commercial retail/restaurant use buildings on the southern commercial site would be reduced from four buildings to three buildings, with a total building area of 23,308 square feet instead of the proposed 45,000 square feet. The proposed 25,000-square foot western commercial retail/restaurant use area and the 774,419-square foot industrial warehouse building would remain as proposed.

2.5 EIR FORMAT AND CONTENT

This EIR contains all the information required to be included in an EIR as specified by the CEQA Statutes and Guidelines (California Public Resources Code, Section 21000 et. seq. and California Code of Regulations, Title 14, Chapter 5). CEQA requires that an EIR contain, at a minimum, certain specified content. In summary, the content and format of this EIR is as follows:

- **Section 1.0, Executive Summary**, provides an overview of the EIR document and CEQA process. The Project, including its objectives, is described, and the location and regional setting of the Project site is documented. In addition, the Executive Summary discloses that there are no potential areas of controversy related to the Project and identifies the potential alternatives to the proposed Project as required by CEQA. Finally, the Executive Summary provides a summary of the Project's impacts, mitigation measures, and conclusions, in a table that forms the basis of the Project's MMRP.
- **Section 2.0, Introduction**, provides introductory information about the CEQA process and the responsibilities of the City of Perris, serving as the Lead Agency for this EIR, a brief description of the Project, the purpose of the EIR, and an overview of the EIR format.
- **Section 3.0, Project Description**, serves as the EIR's Project Description for purposes of CEQA and contains a level of specificity commensurate with the level of detail proposed by the Project, including the summary requirements pursuant to State CEQA Guidelines Section 15123. This section provides a detailed description of the Project, including its purpose, main objectives, design features, construction characteristics, and operational characteristics expected over the Project's lifetime, should development occur on the property. The section also describes the environmental setting, including descriptions of the Project site's physical conditions and surrounding context used as the baseline for analysis in this EIR. In addition, the discretionary actions required of the City of Perris and other government agencies to implement the Project are discussed.

- **Section 4.0, Environmental Analysis**, provides an analysis of potential direct, indirect, and cumulative impacts that may occur with implementation of the proposed Project. A conclusion concerning significance is reached for each discussion; mitigation measures are presented as warranted. The environmental changes identified in Section 4.0 and throughout this Draft EIR are referred to as “effects” or “impacts” interchangeably. The CEQA Guidelines also describe the terms “effects” and “impacts” as being synonymous (CEQA Guidelines §15358).

In the environmental analysis subsections of Section 4.0, the existing conditions are disclosed that are pertinent to the subject area being analyzed, accompanied by a specific analysis of physical impacts that may be caused by implementing the proposed Project. Impacts are evaluated on a direct, indirect, and cumulative basis. Direct impacts are those that would occur directly because of the proposed Project. Indirect impacts represent secondary effects that would result from Project implementation. Cumulative effects are defined in State CEQA Guidelines § 15355 as “...two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.”

The analyses in Section 4.0 are based in part upon technical reports that are appended to this EIR. Information is also drawn from other sources of analytical materials that directly or indirectly relate to the proposed Project and are cited in each individual section. Where the analysis demonstrates that a physical adverse environmental effect may or would occur without undue speculation, feasible mitigation measures are recommended to reduce or avoid the significant effect. Mitigation measures must be fully enforceable, have an essential nexus to a legitimate governmental interest, and be “roughly proportional” to the impacts of the Project. The discussion then indicates whether the identified mitigation measures would reduce impacts to below a level of significance. In most cases, implementation of the mitigation measures would reduce the adverse environmental impacts to below a level of significance. If mitigation measures are not available or feasible to reduce an identified impact to below a level of significance, the environmental effect is identified as a significant and unavoidable adverse impact, for which a Statement of Overriding Considerations would need to be adopted by the City of Perris pursuant to State CEQA Guidelines Section 15093.

- **Section 5.0, Project Alternatives**, describes and evaluates alternatives to the proposed Project that could reduce or avoid the Project’s significant environmental effects. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather to consider a reasonable range of alternatives that will foster informed decision making and public participation. Three alternatives, including the CEQA-required No Project Alternative, are evaluated in detail in Section 5.0.
- **Section 6.0, Other CEQA Considerations**, includes specific topics that are required by CEQA. These include a summary of the Project’s significant and unavoidable environmental effects; a discussion of the significant and irreversible environmental changes that would occur should the Project be implemented; and potential growth-inducing aspects of the proposed Project. Section 6.0 also includes a discussion of the potential environmental effects that were found not be significant during the NOP public review process and that, therefore, do not require a detailed evaluation in this Draft EIR.
- **Section 7.0, Preparers**, lists the persons who authored or participated in preparing this EIR.

2.5.1 Review of an EIR

The City of Perris—as lead agency for the Project—and other public agencies (i.e., responsible and trustee agencies) that may use the Final EIR in their decision making or permitting processes will consider the information in this EIR along with other information that may be presented during the CEQA process.

Upon certification of the Final EIR, the City of Perris will consider whether to approve the proposed OLC3 Ramona Expressway and Perris Boulevard Commercial Warehouse Project. Where feasible mitigation measures are not available to reduce significant environmental impacts to a less than significant level, impacts are considered significant and unavoidable. Written Findings of Fact will be prepared for each significant adverse environmental effect identified in the Final EIR, as required by Section 15091 of the State CEQA Guidelines. If the City certifies a Final EIR for a project that has significant and unavoidable impacts, the City shall also state, in writing, the specific reasons for approving the project based on the Final EIR and any other information in the public record. This is called a “Statement of Overriding Considerations” and is used to explain the specific reasons that the benefits of a proposed project make its unavoidable environmental effects acceptable. The Statement of Overriding Considerations is adopted after the Final EIR is certified and before the action to approve the proposed Project has been taken. Additionally, the City must adopt a MMRP to ensure compliance with mitigation measures that have been incorporated into the Project to reduce or avoid significant effects on the environment during construction and/or implementation.

The actions that may be involved in implementing the Project are described in Subsection 3.7, Summary of Requested Actions, in Section 3, *Project Description*, of this Draft EIR. Other agencies that may have discretionary approval over the Project, or components thereof, including responsible and trustee agencies, are also listed in Subsection 3.7.

2.6 SCOPE OF THIS EIR

2.6.1 Scoping Process

In compliance with Section 15201 of the State CEQA Guidelines, the City of Perris has taken steps to provide opportunities for public participation in the initial environmental review process. As noted above, on July 8, 2022 the first Project NOP was filed at the Riverside County Clerk’s Office. The City also distributed the NOP to 49 federal, state, regional, and local government agencies and interested parties for a 30-day public review period to solicit comments and to inform agencies and the public of the Project. The first NOP comment period began on July 8, 2022 and ended on August 8, 2022. A public scoping meeting was held during a Planning Commission Meeting on July 20, 2022. A second Project NOP was filed at the Riverside County Clerk’s office on April 14, 2023 and was distributed to the SCH for transmittal to state agencies for review. The second NOP comment period began on April 14, 2023 and ended May 20, 2023. The Project was described, potential environmental effects associated with Project implementation were identified, and agencies and the public were invited to review and comment on the NOP.

The City received four responses to the first NOP and received two responses to the second NOP. **Table 2-1, *NOP Response Summary***, provides a summary of the NOP responses and issues raised. A copy of the NOP and responses received are included in Appendix A of this Draft EIR.

**Table 2-1
NOP RESPONSE SUMMARY**

Commenter	Date	Comment Summary	Where Addressed in Draft EIR
Public Agencies			
South Coast Air Quality Management District (SCAQMD)	July 26, 2022	The SCAQMD requested the use of their CEQA Air Quality Handbook and significance thresholds for the basis of the air quality and GHG analysis. Additionally, the SCAQMD 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 SCAQMD also suggests potential mitigation measures and project design features for the Project.	Sections 4.2 and 4.7
Eastern Municipal Water District (EMWD)	July 15, 2022	The EMWD requested that possible impacts to EMWD facilities as a result of the Project be defined and consultation with the EMWD be undertaken. The EMWD also requests that a Design Conditions report be prepared.	Sections 3.0, 4.14, and 6.0
Native American Heritage Commission (NAHC)	April 21, 2023	The NAHC requested that consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project be conducted as early as possible to avoid inadvertent discoveries. The NAHC also requests the proposed project is in compliance with AB 52 and SB 18.	Sections 4.4, and 4.13
California Department of Fish and Wildlife (CDFW)	May 15, 2023	The CDFW requested that DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and associated habitat. The CDFW also requests a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the project. The CDFW also suggests project objectives, alternatives, mitigation measures, a consultation timeline, and project design features to be included in the DEIR.	Section 3.0, 4.3, and 5.0

Commenter	Date	Comment Summary	Where Addressed in Draft EIR
Organizations			
Californians Allied for a Responsible Economy (CARE CA)	August 8, 2022	CARE CA provided general comments regarding the Project description, air quality and public health, mitigation measures, and full disclosure.	Sections 3.0 and 4.0
Public			
B&B Gardner, LP	August 8, 2022	B&B Gardner, LP raised concerns regarding offsite improvements and impacts to eastern properties, impact of future development, mitigation, hydrology, and storm drains.	Section 4.9

As noted previously, an EIR public scoping meeting was conducted on July 20, 2022 during the regularly scheduled Perris Planning Commission hearing at the Perris City Hall City Council Chambers. City staff described the Project to the Planning Commissioners and members of the public and provided a conceptual site plan and architectural elevations for the Project. Following a brief explanation of the environmental review process by the EIR consultant, comments from the commissioners were solicited. There were no other agency representatives or individual members of the public in attendance.

2.6.2 Effects Found Not to be Significant

As identified in the first and second NOP included in Appendix A of this Draft EIR, the City of Perris concluded that the Project would have no impact or a less than significant impact related to agriculture and forestry resources, mineral resources, population and housing, public services, recreation, and wildfire, and that no further analysis of these topics is required in the EIR. Refer to Section 6.1, *Effects Determined Not to be Significant*, of this Draft EIR for a discussion of these topical issues.

2.6.3 Potentially Significant Impacts of the Proposed Project Addressed in this EIR

The NOPs and NOP comments received were used to establish the scope of the issues addressed in this EIR. The City of Perris identified that additional Project-level analysis was required to evaluate potential impacts associated with the implementation of the Project for the following environmental issue areas. Section 4.0 of this EIR provides the environmental analysis and outlines the mitigation program for each of the following topical issues.

- Aesthetics (Section 4.1)
- Air Quality (Section 4.2)
- Biological Resources (Section 4.3)
- Cultural Resources (Section 4.4)
- Energy (Section 4.5)
- Geology and Soils (Section 4.6)
- Greenhouse Gas Emissions (Section 4.7)
- Hazards and Hazardous Materials (Section 4.8)
- Hydrology and Water Quality (Section 4.9)
- Land Use and Planning (Section 4.10)
- Noise (Section 4.11)
- Transportation (Section 4.12)
- Tribal Cultural Resources (Section 4.13)
- Utilities and Service Systems (Section 4.14)

2.7 INCORPORATION BY REFERENCE

In accordance with Section 15150 of the State CEQA Guidelines, an EIR may incorporate by reference all or portions of another document that is a part of public record or is available to the public. The previously prepared EIRs and environmental analyses listed below were relied upon or consulted in the preparation of this EIR, and are hereby incorporated by reference:

- Perris Comprehensive General Plan 2030, City of Perris, originally approved April 26, 2005 and subsequently amended.
- Perris General Plan 2030 Draft Environmental Impact Report (SCH No. 2004031135), certified April 26, 2005.
- Perris Valley Commerce Center Specific Plan adopted January 10, 2012 and subsequently amended.
- Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (SCH No. 2009081086), certified January 10, 2012.

These documents are available for review at the address provided in Subsection 2.8, below.

2.8 PUBLIC REVIEW OF THE DRAFT EIR

This Draft EIR is being circulated for review and comment to the public and other interested parties, agencies, and organizations. The comment period will begin on September 8, 2023 and end on October 23, 2023. During the review period, the Draft EIR will be available for review at the Planning Division building located at the address presented below. The Draft EIR will also be available on the City's website at <https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review>.

Written comments on the Draft EIR should be addressed to:

Douglas Fenn
City of Perris Planning Division
135 North D Street
Perris, California 92570
Dfenn@cityofperris.org
(951) 943-5003

2.9 REFERENCES

City of Perris. 2011. Perris Valley Commerce Center Specific Plan Final Environmental Impact Report. November 2011, certified January 10, 2012. Available at:

<https://www.cityofperris.org/Home/ShowDocument?id=2645>.

2005. Perris Comprehensive General Plan 2030. Approved April 26, 2005. Available at

<https://www.cityofperris.org/departments/development-services/general-plan>.

2004. Draft Environmental Impact Report City of Perris General Plan 2030, State Clearinghouse #2004031135. October 2004, certified April 26, 2005. Available at:

http://www.cityofperris.org/city-hall/general-plan/General_Plan_2030.pdf.

3.0 PROJECT DESCRIPTION

3.1 INTRODUCTION

This section provides a brief background for the Project, followed by a detailed description of the Project and its environmental setting, pursuant to Sections 15124 and 15125, respectively, of the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines). This includes a description of the Project location, geographic setting, environmental setting, Project objectives, Project components, and discretionary actions required to implement the Project. The Project description is used as the basis for analyzing the Project's potential impacts on the existing physical environment in Section 4.0 of this Draft EIR.

3.2 PROJECT BACKGROUND

On January 10, 2012, the City of Perris City Council adopted the Perris Valley Commerce Center Specific Plan (PVCCSP), which was prepared pursuant to the authority granted to the City by California Government Code, Title 7, Division 1, Chapter 3, Article 8, Sections 65450 to 65457. On the same date, the City also adopted Ordinance No. 1284, adopting Specific Plan Zoning for properties within the PVCCSP area. The PVCCSP land uses allow for the development of approximately 3,500 acres which consist of industrial, commercial, and office uses, as well as public facilities. The PVCCSP has been subsequently amended 14 times, with Amendment No. 14 adopted in March 2023. In conjunction with its approval of the PVCCSP, the City complied with CEQA by preparing and certifying the Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (PVCCSP EIR) (State Clearinghouse No. 2009081086) (City of Perris 2011), which is incorporated by reference in this Draft EIR and is available for public review at the City of Perris Planning Division, 135 North D Street, Perris, California 92570.

3.3 PROJECT LOCATION

The Project site is in the City of Perris (City), in Riverside County (County), California, near the intersection of Ramona Expressway and North Perris Boulevard (see **Figure 3-1, Regional Location**, and **Figure 3-2, Project Location and Vicinity**). The Project site consists of approximately 45.1 acres and contains disturbed vacant land that was previously used for agricultural purposes. The Project site is bounded by Ramona Expressway to the south, North Perris Boulevard to the west, Perry Street to the north, and Redlands Avenue to the east. It is located approximately 1.7 miles east of Interstate (I-) 215 and approximately 6.4 miles south of State Route (SR) 60 and approximately 1.4 miles south of March Air Reserve Base/Inland Port Airport (MARB/IPA). The Project site is located within the MARB/IPA Airport Influence Area Boundary and the City's Airport Overlay Zone. The Project site is located almost entirely within Airport Compatibility Zone D (Flight Corridor Buffer) with a small portion of the site located within Zone C1 (Primary Approach/Departure Zone). The Project site is comprised of Assessor's Parcel Numbers (APN) 302-130-002, 302-130-008, 302-130-018, 302-130-021 through 302-130-024, and 302-130-027.



Figure 3-1



3.4 ENVIRONMENTAL SETTING

Below is a brief description of the geographic setting for the area, and environmental setting for the Project site and the surrounding areas. Additional setting information is provided for each topical issue analyzed in Section 4.0 of this Draft EIR.

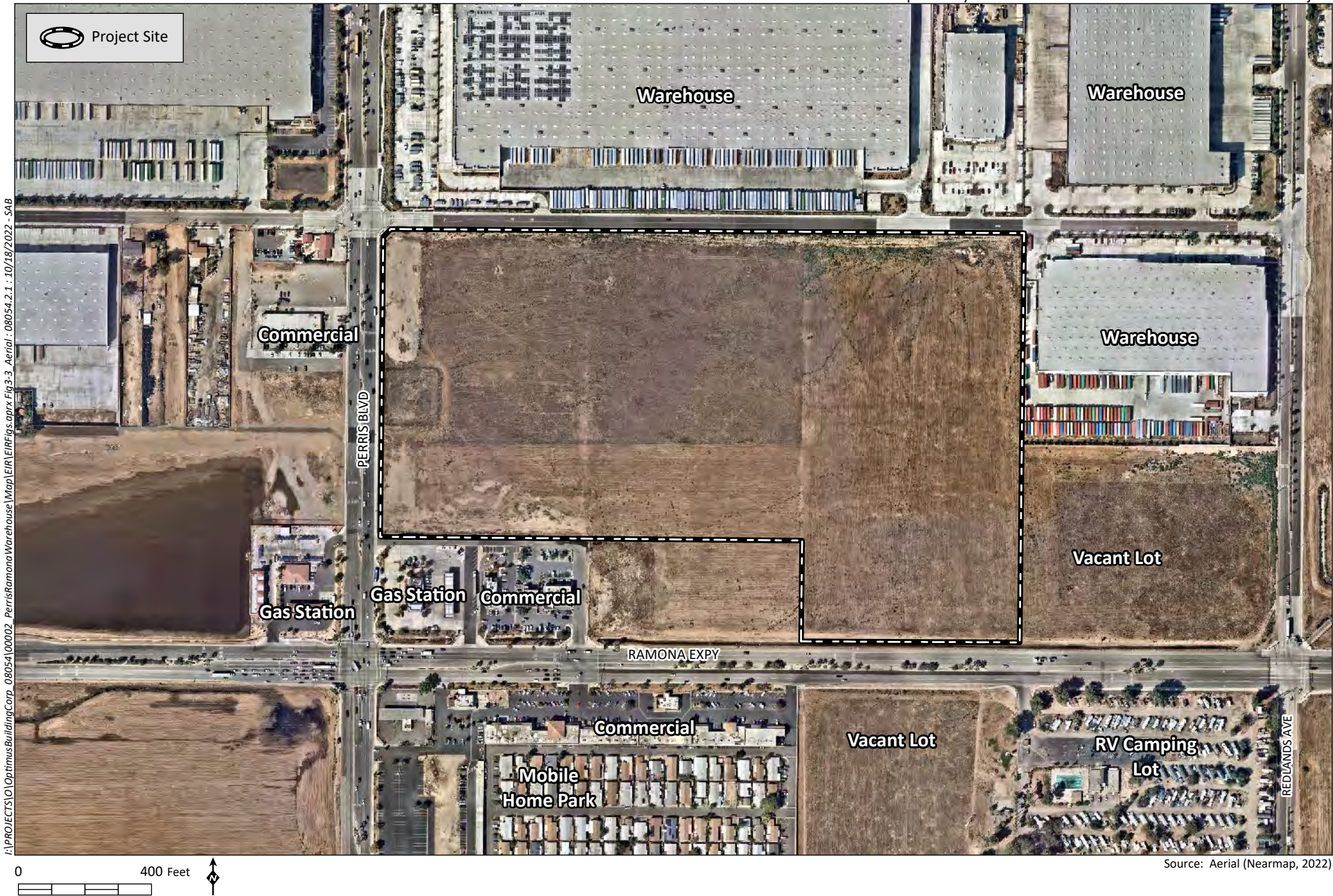
The Project site is generally flat with elevations ranging between 1,450 and 1,460 feet above mean sea level (amsl), with stormwater runoff generally flowing to the southeast. An existing drainage swale is located along the north side of Ramona Expressway (i.e., along the southern edge of the Project site), which is owned and maintained by the Riverside County Flood Control and Water Conservation District (RCFCWCD) and runs in an east-west direction connecting to the Perris Valley Storm Drain about 1,850 feet to the east.

The City of Perris is in the Perris Block geologic unit, which lies within the Peninsular Ranges Geomorphic Province of Southern California. The Peninsular Ranges Geomorphic Province is characterized by a series of northwesterly trending mountain ranges that extend from the coast of California eastward into the California desert and south to the tip of Baja California, Mexico. The Perris Block is bound on the northeast by the San Jacinto Fault, on the north by the Cucamonga Fault and the San Gabriel Mountains, and on the southwest by the Elsinore Fault and the Santa Ana Mountains. The City of Moreno Valley borders Perris to the north and the City of Menifee borders the City to the south. Unincorporated areas of Riverside County border the City to the east and west.

As shown on **Figure 3-3, Aerial Photograph**, land uses surrounding the Project site include a mix of undeveloped and developed land. Specifically, surrounding properties include undeveloped vacant land to the west, east, and south; commercial uses to the west and south; industrial and warehouse development to the north and east; and a gas station and commercial uses immediately adjacent to the southwest. A mobile home park occurs approximately 300 feet south of the Project site at the closest point, while a Recreational Vehicle (RV) park is located approximately 150 feet to the southeast, beyond the existing commercial uses southeast of the intersection of Ramona Expressway and North Perris Boulevard.

The existing General Plan land use designation for the Project site is Perris Valley Commerce Center Specific Plan and the zoning is Commercial per the PVCCSP. Commercial land use designations are identified immediately to the west and south. Light Industrial uses are designated to the north, while Light Industrial and Commercial designations are located immediately to the east.

The Project site is located within the Mead Valley Area Plan of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The Project site is not located within any MSHCP Criteria Cell or designated conservation area, Core or Linkage area, Mammal Survey Area, or Amphibian Survey Area. However, the Project site is located within the MSHCP Criteria Area Species Survey Area, Narrow Endemic Plant Species Survey Area, and Burrowing Owl Survey Area.



The Project site is vacant and is primarily comprised of disturbed vegetation and habitat that is dominated by a low carpet of non-native grass and weeds. Native vegetation and habitats within Project site boundaries have been eliminated due to long-term disturbances associated with agricultural uses and weed abatement activities. The resulting site condition is heavily disturbed with compacted surface soils. One large detention basin is present in the western portion of the site, where wind-blown trash accumulates. The vacant Project site is used for illegal trash dumping. An abandoned water stack (i.e., agricultural water source) likely associated with previous agricultural uses is in the central portion of the Project site. A drainage ditch is located within the Project site, near the Project's southern property line, adjacent to Ramona Expressway.

Historical uses for the Project site were determined based on a review and evaluation of aerial photographs. Between 1938 and 1985, the Project site was undeveloped, vacant, and in a rural agricultural setting, with agricultural land uses occurring on the majority of the Project site in aerial photographs from 1949, 1953, and 1961. The detention basin located in the western portion of the site and the drainage ditch located in the southern portion of the site, along the north side of Ramona Expressway were first observed in a 1966 aerial photograph. From 1985 to the present, the Project site has remained undeveloped and vacant. The area surrounding the Project site began developing during this period, with residential, commercial, and industrial development. In a 1997 aerial photograph, the southwest corner of the Project site had been cleared and was being used as a staging area for a commercial development occurring at the intersection of North Perris Boulevard and Ramona Expressway. This portion of the site has remained disturbed since completion of the commercial development and is currently being used for trailer truck parking on a daily basis.

3.5 PROJECT OBJECTIVES

The Applicant's fundamental purpose and goal of the Project is to provide an industrial warehouse building in the northern portion of the City of Perris, near designated truck routes, and to increase employment opportunities in a housing rich area. An additional goal is to provide a variety of commercial uses along Ramona Expressway to further reduce the necessity for driving when services are provided close by the employment center as envisioned by the City of Perris. The Project would achieve its purpose and goals through the following objectives:

1. Provide an attractive mixed-use retail project along Ramona Expressway that enhances and meets the local demand for the availability of social gathering places, retail services, and eateries in an underserved area of the PVCCSP, thereby providing additional job opportunities in a housing-rich area and providing more equal jobs to housing balance.
2. Setting aside additional land for future commercial, retail, and office opportunities in the fast-growing Perris Blvd Corridor to further enhance job opportunities, local services, and retail, commercial uses in an area that is housing rich but underserved in these areas.
3. Maximize the development of Class A speculative high cube warehouse industrial buildings that meet contemporary industry standards for operational design criteria, can accommodate a wide variety of users, and are economically competitive with similar warehouse buildings in the local area and region, which will assist the City of Perris in competing economically on a domestic and international scale through the efficient and cost-effective movement of goods.

4. Maximize industrial warehouse development near designated truck routes and the State highway system to avoid or shorten truck-trip lengths on other roadways and avoid locating industrial warehouse buildings in proximity to residential uses.
5. Implement drainage improvements in conjunction with the Project to accommodate the 100-year storm flows in the area, including a public storm drain conveyance that would capture stormwater runoff from the region to the detention basin east of the project site, thus solving regional flooding problems.
6. Accommodate new development in a phased, orderly manner that is coordinated with the provision of necessary infrastructure and public improvements.
7. Provide for uses that will generate tax revenue for the City of Perris, including, but not limited to, increased property and sales tax, to support the City's ongoing municipal operations.

3.6 PROJECT COMPONENTS

The proposed Project involves the construction and operation of a non-refrigerated warehouse building with ancillary office uses on approximately 36 acres and future development of commercial retail/restaurant uses within two separate portions of the Project site including an approximately 4.7-acre portion to the south of the warehouse building and a 4.8-acre portion to the west of the warehouse building. The Project Applicant is requesting the discretionary approvals described below. **Figure 3-4, Overall Site Plan**, presents the conceptual site plan for the proposed warehouse and retail/restaurant uses, respectively. For analysis purposes throughout the EIR, it is conservatively assumed that construction of the industrial warehouse and southern and western commercial retail areas would be completed in one phase lasting approximately 11 months.

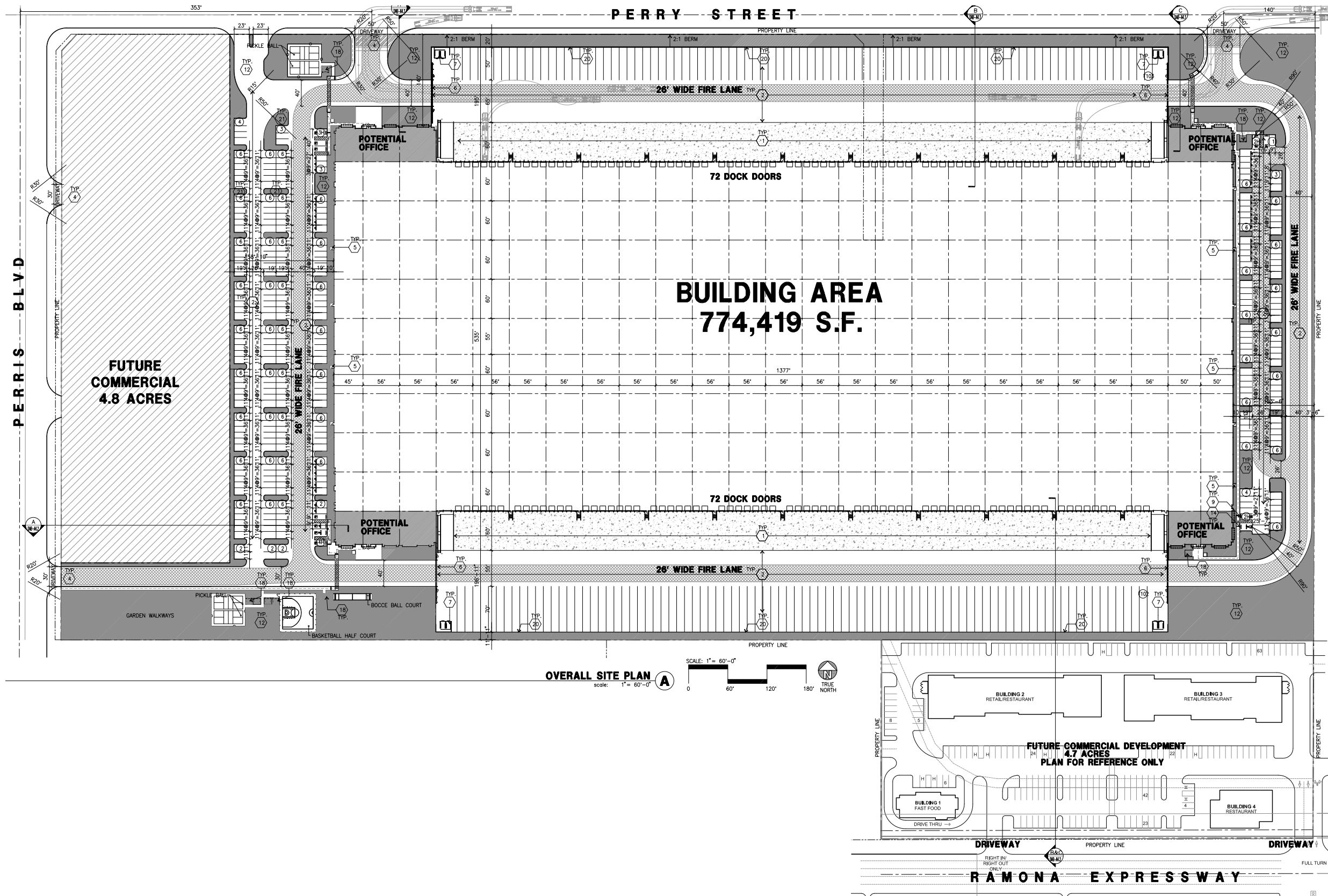
The proposed warehouse use is not consistent with the current PVCCSP Commercial zoning designation for the Project site; however, the Project Applicant is requesting an amendment to the PVCCSP to change the warehouse portion of the Project site to Light Industrial, under which warehouse uses are permitted. The proposed commercial uses are consistent with the existing PVCCSP zoning designation for the remainder of the Project site. Specific retail tenants have not been identified; therefore, for purposes of analysis in the EIR, the proposed conceptual site plan represents the anticipated mix and site design for retail uses at the Project site. However, other retail uses may ultimately be contemplated, consistent with those allowed under the PVCCSP.

3.6.1 DPR for the Proposed Industrial Warehouse Building and Commercial Development

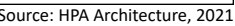
Warehouse Building

The proposed warehouse building would be in the central portion of the Project site and would include 774,419 total square feet of a high-cube fulfillment center warehouse building, which would also include up to 20,000 square feet of planned ancillary office area. See **Figure 3-5, Warehouse Floor Plan**. The tenant is not known at this time; therefore, for purposes of analysis, it is assumed that the building square footage would be operated as a high-cube fulfillment center warehouse, and the building could operate 24 hours a day, seven days a week. See **Figure 4.1-3, Warehouse Elevations**.

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Source: HPA Architecture, 2021



The building would comply with applicable standards and guidelines outlined in the PVCCSP for Light Industrial uses and would therefore reflect a modern industrial design. The building would have a maximum structural height of 50 feet. Required indoor and outdoor employee amenities would also be provided.

Commercial Retail Development

As noted above, the Project Applicant also proposes commercial retail/restaurant uses within both an approximately 4.7-acre portion of the Project site to the south of the warehouse building along the north side of Ramona Expressway and an approximately 4.8-acre portion of the Project site to the west of the warehouse building along the east side of Perris Boulevard. See **Figure 3-6**, *Southern Commercial Conceptual Site Plan*, and **Figure 3-7**, *Western Commercial Conceptual Site Plan*. The future commercial developments would include approximately 45,000 square feet of retail and restaurant uses comprised of 21,825 square feet of strip retail plaza use, a 5,000-square-foot high turnover (sit-down) restaurant, 14,775 square feet of fast-food restaurant without drive-through window use in line with retail use, and a 3,400-square-foot fast-food restaurant with drive-thru window use).

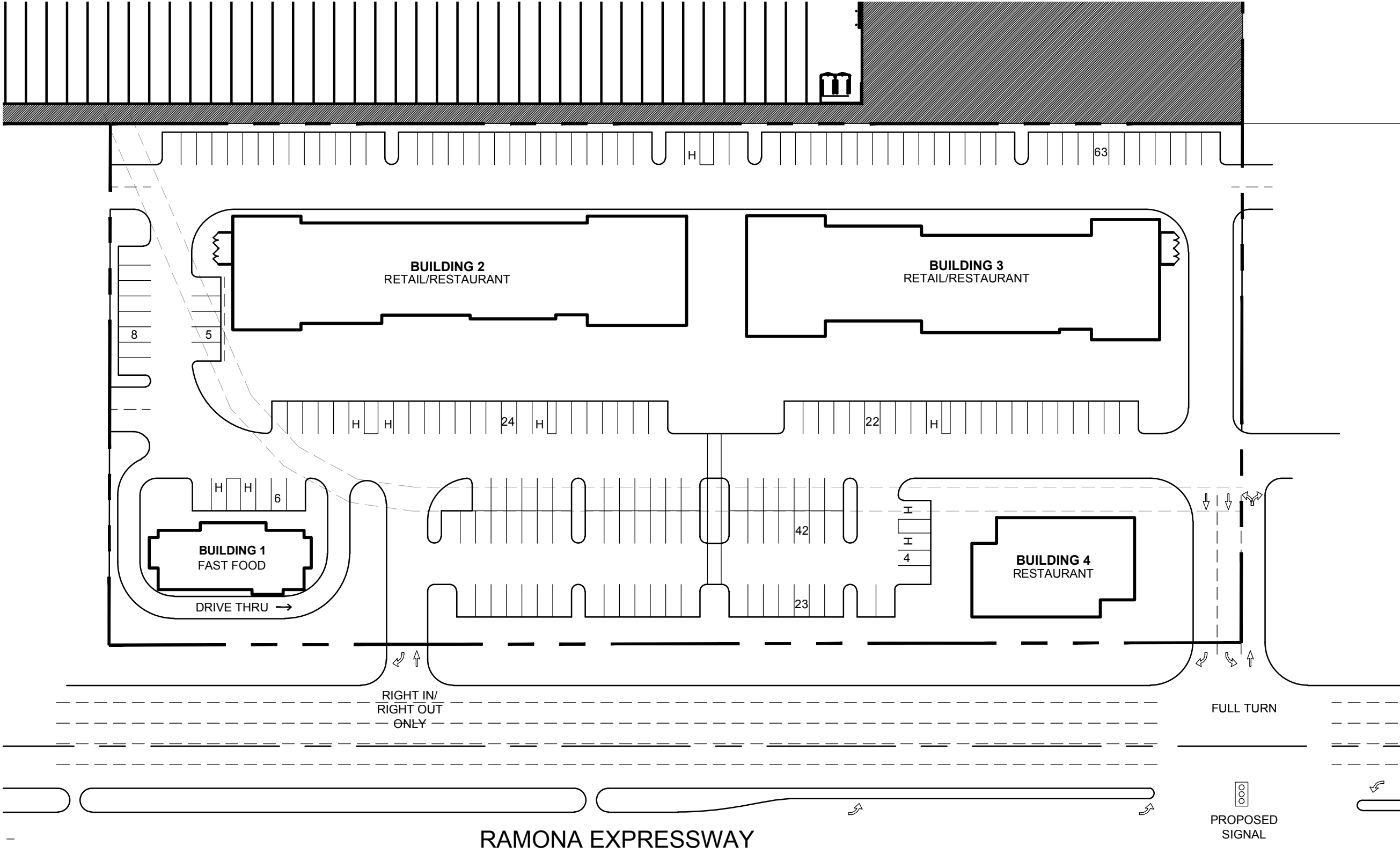
Although not currently included in the Project's Development Plan Review request, future commercial development within the western commercial site would include approximately 25,000 square feet of retail and restaurant uses (comprised of 18,000 square feet of strip retail/restaurant use and two fast-food restaurants with drive-through window totaling 4,000 square feet and 3,000 square feet, respectively). The buildings would comply with applicable standards and guidelines outlined in the PVCCSP related to architecture. The buildings would have a maximum building height of 45 feet.

Access, Circulation, and Parking

The Project would provide three automobile access driveways off Perris Boulevard with right-in/right-out access only (one for warehouse access and two for access to the 4.8-acre future western retail component), and three truck and automobile access driveways off Perry Street with left-in/right-out access only for trucks and no turn restrictions for automobiles. The 4.7-acre southern retail component would have one right-in/right-out access driveway and one full signalized access driveway on Ramona Expressway. The proposed warehouse site plan includes 325 automobile parking stalls, 144 truck docks, and 177 trailer parking stalls. The southern commercial site plan includes 193 parking spaces, while the western commercial site plan includes 172 parking spaces. Bike racks would also be provided.

Truck Routes

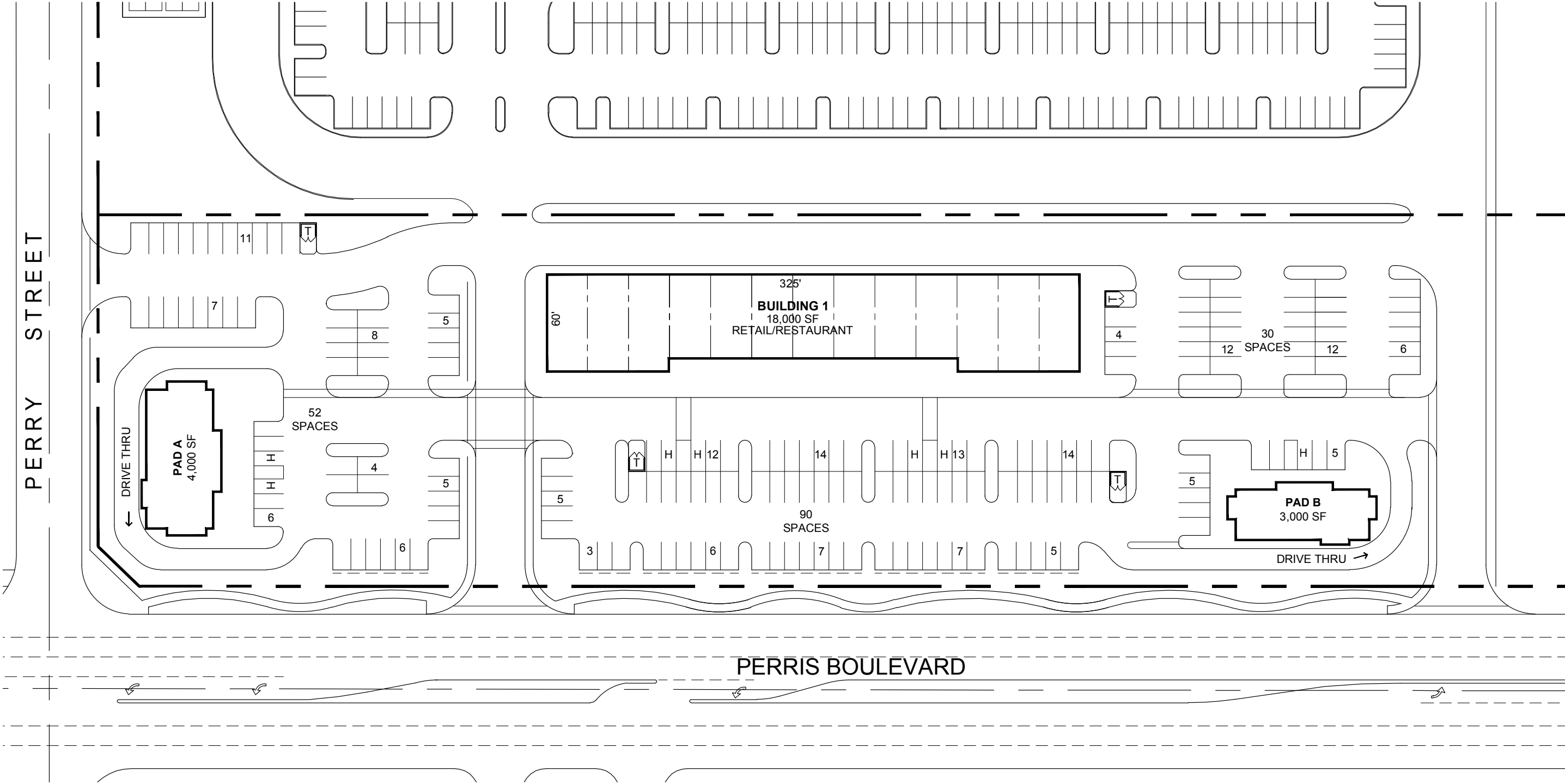
Trucks traveling to/from the Project site would be required to access PVCCSP-designated truck routes. Directional signage would be provided onsite to direct drivers accordingly. Based on direction from the City, all trucks would enter and exit the warehouse facility only from Perry Street via Redlands Avenue, a PVCCSP-designated truck route, to Harley-Knox Boulevard to travel to and from I-215. No warehouse truck traffic would be permitted along Perris Boulevard or Ramona Expressway. Two full-access designated driveways for trucks would be provided on Perry Street. The driveways would be modified to accommodate a 45-foot curb radius for the egress turning radius of trucks.



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Source: HPA Architecture, 2021

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Source: HPA Architecture, 2021

Western Commercial Conceptual Site Plan

Figure 3-7

Landscaping, Walls/Fences, and Lighting

Landscaped parkways would be provided along Ramona Expressway consistent with PVCCSP requirements, as Ramona Expressway is designated as an Expressway. To obstruct views from this thoroughfare, a 14-foot-high concrete screening wall would be provided along the southern boundary of the industrial warehouse facility between the proposed retail and warehouse uses and landscaping would be provided along the Ramona Expressway frontage of the retail portion of the Project site. A 14-foot-high concrete screening wall would also be provided along the warehouse facility's Perry Street frontage on the north. Landscaping would be provided along the entire site perimeter of both the warehouse and retail portions of the Project site, within the automobile parking areas for visual quality and shading, and at select building-adjacent locations. Approximately 13.7 percent of the warehouse portion of the Project site would be landscaped. Onsite exterior lighting would be provided throughout the warehouse and retail portions of the Project site as required for security and wayfinding.

Utilities

The Project would include the installation of onsite storm drain, water quality, water, sewer, electric, natural gas, and telecommunications infrastructure systems to serve the proposed warehouse and retail uses. Infrastructure improvements would also include the construction of an extension of the planned Line E storm drain box culvert, which would be constructed below grade along the southern edge of the warehouse portion of the Project site, then turning to the southeast beneath the retail portion of the Project site and continuing eastward to either terminate at the eastern edge of the Project site or continuing onto and through the off-site property immediately adjacent to the east. If undertaken by the Project Applicant, it is anticipated that this off-site portion of the Line E storm drain would be constructed as part of the Project. The onsite utility infrastructure would connect to existing utilities in the vicinity of the Project site or new utility lines that would be installed within the public right-of-way adjacent to the Project site. The Eastern Municipal Water District (EMWD) has stated that it is willing to provide water and sewer services to the industrial and commercial retail areas (EMWD 2022). The Will-Serve letter is provided as Appendix V to this EIR.

3.6.2 Specific Plan Amendment for the Proposed Industrial Warehouse Building

The current General Plan land use designation for the Project site is Specific Plan (i.e., the PVCCSP). The Project site has a PVCCSP land use designation of Commercial. A Specific Plan Amendment is required to change a portion of the site's zoning to Light Industrial, which includes warehouse facilities as a permitted use. Specifically, the following amendments to the PVCCSP (most recently amended in March 2023) are proposed.

- Change (rezone) the PVCCSP land use designation for 36.01 acres of Commercial to Light Industrial (LI) to facilitate development of the proposed 774,419-square-foot warehouse building.
- Revise Figure 2.0-1, Specific Plan Land Use Designation, to change the land use designations for the central portion of the Project site (approximately 36 acres) from Commercial to LI as indicated above.

- Revise Table 2.0-1, Land Use Comparison, to update the acreage calculations for “Proposed Acres” as follows: reduce Commercial from 270 to 234 and increase LI from 2,033 to 2,069 acres.

3.6.3 Tentative Parcel Map No. 05048

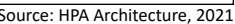
The Project involves proposed TPM No. 05048 to re-subdivide the existing eight-parcel Project site into seven parcels (one parcel for the proposed warehouse use, two parcels for the proposed retail use, and up to four parcels for future commercial/retail uses). It should be noted that the ultimate number and location of parcels within the property may be adjusted later. The existing APNs subject to the proposed changes are: 302-130-002, 302-130-008, 302-130-018, 302-130-021, 302-130-022, 302-130-023, 302-130-024, and 302-130-027.

3.6.4 Construction Characteristics

For analysis purposes throughout the EIR, it is conservatively assumed that construction of the industrial warehouse and southern and western commercial retail areas would be completed in one phase lasting approximately 11 months. As part of Project construction, the property would be prepared for construction and mass graded, and underground utility infrastructure would be installed. Next, surface materials would be poured, and the proposed buildings would be constructed or erected, connected to the underground utility system, and painted. Lastly, fine grading would occur, and landscaping and fencing/walls would be installed. Proposed grading activities would result in physical disturbance to a total of approximately 49 acres (or the entire property). No other on- or off-site physical impacts are anticipated as part of the Project.

Earthwork activities would result in approximately 38,606 cubic yards (CY) of cut and 38,606 CY of fill. The industrial/commercial site off Perry Street and North Perris Boulevard would require approximately 40,000 CY of import. The commercial site off Ramona Expressway would require approximately 20,000 CY of import. Underground utilities would be installed to a maximum depth of 10 feet below grade. See **Figure 3-8, Preliminary Industrial Grading Plan**, and **Figure 3-9, Preliminary Commercial Grading Plan**.

As further discussed in Section 4.12, *Noise*, of this Draft EIR, the City of Perris Municipal Code, Section 7.34.060, allows construction activities during daytime hours (between the hours of 7:00 AM and 7:00 PM Monday through Saturday, except legal holidays). Construction equipment is expected to operate in the Project area eight hours per day during the allowed days and time period; however, the typical working hours for most construction contractors are 7:00 AM to 4:00 PM, and construction equipment is not in continual use; each piece of equipment is used only periodically during a typical construction workday. Thus, eight hours of daily use per piece of equipment is a reasonable assumption, and likely overstates the actual amount of time that each piece of construction equipment would operate on a daily basis. Should construction activities need to occur outside of the hours permitted by the Municipal Code, the Project Applicant would be required to obtain authorization from the City. Should onsite concrete pouring activities need to occur at night to facilitate proper concrete curing, pours would typically occur between the approximate hours of 2:00 AM and 8:00 AM.





HELIX
Environmental Planning

Figure 3-9

In addition to onsite construction activities, the Project would involve site adjacent roadway and driveway access improvements along Perris Boulevard, Perry Street, and Ramona Expressway, as previously described. Utility infrastructure would be installed onsite and would connect to existing utility lines in the adjacent roadways. Construction staging would occur within the Project impact limits and would be located the farthest distance feasible from existing residential or other sensitive land uses.

Lights may be used within the construction areas during typical construction hours, notably in the construction staging areas, to provide security for construction equipment and construction materials. Further, if construction-related activities occur during nighttime hours in the Project area, temporary, overhead artificial lighting would be provided to illuminate the work area.

Construction workers would travel to the Project area by passenger vehicle and material deliveries would occur by medium- and heavy-duty trucks. Construction of the Project would require common construction equipment. The site-specific construction fleet may vary due to specific needs at the time of construction; however, a summary of construction equipment assumptions by construction phase used for purposes of analysis in this EIR is provided in Section 4.2, *Air Quality*, of this Draft EIR.

3.6.5 Operational Characteristics

Currently, the future occupants of the Project's warehouse building and commercial retail areas are unknown. The Project Applicant expects that the warehouse building would be occupied by warehouse distribution operators; the building is not designed to accommodate any manufacturing, warehouse cold storage, or refrigerated uses. For the purpose of evaluation in this Draft EIR, the warehouse building is assumed to be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night. Lighting would be subject to compliance with City of Perris Code of Ordinances §19.02.110., which states that:

"Commercial and industrial parking areas shall have lighting which provides adequate illumination for safety and security. Parking lot lighting fixtures shall maintain a minimum of one-foot candlepower across the surface of the parking area. Lighting standards shall be energy efficient and in scale with the height and use of the structures on site. All lighting, including security lighting, shall be directed away from adjoining properties and the public right-of-way."

Exterior lighting shall also be fully shielded to preclude light pollution or light trespass on abutting residential land uses and public rights-of-way.

The warehouse building is designed such that business operations would be conducted within the enclosed building, except for traffic movement, parking, and the loading and unloading of tractor trailers at designated loading bays. The outdoor cargo handling equipment used during loading, and unloading of trailers (e.g., yard trucks, hostlers, yard goats, pallet jacks, forklifts) is expected to be non-diesel powered per contemporary industry standards. As a practical matter, dock doors on warehouse buildings are not occupied by a truck at all times of the day. There are typically many more dock door positions on warehouse buildings than are needed for receiving and shipping volumes. The dock doors that are in use at any given time are usually selected based on interior building operation efficiencies. In other words, trucks dock in the position closest to where the goods carried by the truck are stored inside the warehouse. As a result, many dock door positions are frequently inactive throughout the day.

The Project Applicant expects that the commercial retail buildings will be occupied by commercial retail employees and visitors. For the purposes of evaluation in this Draft EIR, the retail area is assumed to be

operational 24 hours per day. Lighting on the commercial retail areas would also be subject to compliance with City of Perris Code of Ordinance §19.02.110. Exterior lighting shall also be fully shielded to preclude light pollution or light trespass on abutting residential land uses and public rights-of-way. The commercial retail buildings area was designed such that business operations would be conducted within the enclosed buildings, except for traffic movement, parking, drive-through orders, and outdoor activity onsite.

Pursuant to State law, on-road diesel-fueled trucks are required to comply with various air quality and greenhouse gas emission standards, including but not limited to the type of fuel used, engine model year stipulations, aerodynamic features, and idling time restrictions. Compliance with State law is mandatory and inspections of on-road diesel trucks subject to applicable State laws are conducted by the California Air Resources Board (CARB).

3.7 SUMMARY OF REQUESTED ACTIONS

Pursuant to the provisions of CEQA and the State CEQA Guidelines, the City of Perris, as the lead agency, is charged with the responsibility of deciding whether to approve the Project. As identified above, the following permits and discretionary actions are required by the City of Perris to implement the proposed Project:

- **Certification of an EIR** with the determination that the EIR has been prepared in compliance with the requirements of CEQA;
- **Specific Plan Amendment** to amend the PVCCSP to change a portion of the site's zoning to Light Industrial, which includes warehouse facilities as a permitted use.
- **Development Plan Review DPR 22-00006 and DPR 22-00019 and CUP 22-05180** for the warehouse and southern commercial site plan and building elevations;
- **Tentative Parcel Map No. 05048** to re-subdivide the existing eight-parcel Project site into seven parcels (subject to change as noted above); and

Other non-discretionary actions anticipated to be taken by the City at the staff level for the proposed Project include:

- Review and approval of all off-site infrastructure plans, including street and utility improvements pursuant to the conditions of approval;
- Review of all plans, including grading and on-site utilities; and
- Approval of a Preliminary Water Quality Management Plan to mitigate 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) to ensure that construction site drainage velocities are equal to or less than the pre-construction conditions and downstream water quality is not worsened;

- A determination by the **Riverside County Airport Land Use Commission (ALUC)**;
- Compliance with the **South Coast Air Quality Management District** Indirect Source Rule (Rule 2305) for warehouse owners and operators;
- Approval of Water Supply Assessment and water and sewer improvement plans by the **Eastern Municipal Water District**; and
- Permits or associated approval by other utility agencies as necessary, for installation of new utility infrastructure or connections to existing facilities.

3.8 REFERENCES

Albert A. Webb Associates. 2011. Perris Valley Commerce Center Specific Plan Final Environmental Impact Report. November 2011, certified January 10, 2012. Available at:
<http://www.cityofperris.org/city-https://www.cityofperris.org/Home/ShowDocument?id=2645>.

City of Perris. 2022. Perris Valley Commerce Center Amendment No. 12 Specific Plan. February 2022. Adopted January 10, 2012, and subsequently amended and approved January 11, 2022. Available at: <https://www.cityofperris.org/Home/ShowDocument?id=2647>.

Eastern Municipal Water District (EMWD). 2022. Will-Serve letter written on April 20, 2022. Included as Appendix V.

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4.0 ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS

Sections 4.1 through 4.14 of this Draft EIR provide analysis of impacts for those environmental topics where it was determined that the Project could result in “potentially significant impacts.” Each topical section includes the following information:

- A description of the existing setting including a discussion of the regulatory framework, if applicable.
- Identification of thresholds of significance.
- Identification of applicable PVCCSP Standards and Guidelines if applicable.
- Identification of Project Design Features (PDFs) that have been incorporated into the Project to prevent the occurrence of or to reduce the significance of potential environmental impacts from the Project.
- Analysis of potential Project effects.
- Identification of additional Project-specific mitigation measures, if required, to reduce the identified Project impacts.
- Identification of the level of significance of impacts after mitigation, including unavoidable significant adverse impacts.
- Evaluation of potential cumulative impacts.

As described in Section 3.0, *Project Description*, of this Draft EIR, the Project includes three primary components: (1) a 774,419-square-foot warehouse building that includes up to 20,000 square feet of ancillary office space and associated site improvements; (2) a 4.7-acre commercial portion to the south of the warehouse building proposed for retail and restaurant uses; and (3) a 4.8-acre commercial portion to the west of the warehouse building proposed for future retail and restaurant uses. These three Project components collectively encompass approximately 46 acres of site area. Unless otherwise noted, the analysis presented in Sections 4.1 through 4.14 of this Draft EIR addresses the entire Project including potential future retail and restaurant development on the two commercial portions of the Project site. Distinctions between impacts from construction and operation of the buildings are made where pertinent to the topical issue.

Mitigation Program

The mitigation program identified for each topical issue to reduce potential Project impacts consists of Project-specific Mitigation Measures (MMs) and PDFs. The components of the mitigation program are described below; each component will be included in the MMRP for the Project.

- Mitigation Measures (MMs). Where a potentially significant environmental effect has been identified Project-specific mitigation measures have been recommended in accordance with CEQA.

- **Project Design Features (PDFs).** PDFs are specific Project components or design elements that have been incorporated into the Project to prevent the occurrence of, or to reduce the significance of, potential environmental effects. Because PDFs have been incorporated into the Project, they do not constitute mitigation measures, as defined by CEQA. However, PDFs are identified so that they are included in the MMRP to be implemented as a part of the Project. In the absence of the implementation of a PDF, a significant impact could occur.

If the Project proponent requests a modification, substitution, or change in timing for a PDF or mitigation measure because the PDF or mitigation measure in current form proves to be impracticable or unworkable, the City may modify, substitute, or change the timing for the PDF or mitigation measure as long as: (1) the modification, substitution, or change in timing would achieve the same or greater reduction in potential impacts of the Project as the original PDF or mitigation measure; (2) the modification, substitution, or change would not cause any impacts that were not otherwise analyzed in this EIR; and (3) the City publicly provides a legitimate reason for making the modification, substitution, or change in timing and supports the reason with substantial evidence. The City of Perris Planning Division, in conjunction with any appropriate agencies or City departments, will determine the adequacy of any proposed modification, substitution, or change in timing and may refer its determination to the Planning Commission. The Project proponent will bear any costs associated with providing information that any department or decision-making body for the City requires to make the determination.

Summary of EIR Scope

In accordance with State CEQA Guidelines Sections 15126-15126.4, this EIR Section includes analyses of potential direct, indirect, and cumulatively considerable impacts that could occur from planning, constructing, and/or operating the proposed Project.

In compliance with the procedural requirements of CEQA, an NOP was prepared to determine the scope of environmental analysis for this Draft EIR. The City of Perris distributed the NOP to public agencies and interested individuals and posted the NOP on its website to solicit input on the scope of study for the EIR. The City of Perris also held an EIR Scoping Meeting to solicit input from the public on the scope of study for the Draft EIR. Taking all known information and public comments into consideration, 14 primary environmental subject areas are evaluated in detail in this Section 4.0, as listed below. Each subsection evaluates several specific topics related to the primary environmental subject. The title of each subsection is not limiting; therefore, refer to each subsection for a full account of the subject matters addressed therein.

- Aesthetics (Section 4.1)
- Air Quality (Section 4.2)
- Biological Resources (Section 4.3)
- Cultural Resources (Section 4.4)
- Energy (Section 4.5)
- Geology and Soils (Section 4.6)
- Greenhouse Gas Emissions (Section 4.7)
- Hazards and Hazardous Materials (Section 4.8)
- Hydrology and Water Quality (Section 4.9)
- Land Use and Planning (Section 4.10)
- Noise (Section 4.11)
- Transportation (Section 4.12)
- Tribal Cultural Resources (Section 4.13)
- Utilities and Service Systems (Section 4.14)

As concluded by the Project's NOP (included in Appendix A of this Draft EIR) and after consideration of all comments received by the City on the scope of this Draft EIR and documented in the City's administrative record, six environmental subjects were determined by the City to have clearly no potential to be significantly impacted by the Project: Agriculture and Forestry Resources, Mineral Resources, Population and Housing, Public Services, Recreation, and Wildfire. These six subjects are discussed briefly in Section 6.1, *Effects Determined Not to be Significant*, of this Draft EIR.

Assumptions Regarding Cumulative Impacts

CEQA requires that an EIR contain an assessment of the cumulative impacts that may be associated with a proposed project. As noted in State CEQA Guidelines Section 15130(a), "an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." "A cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects creating related impacts" (State CEQA Guidelines Section 15130(a)(1)).

As defined in State CEQA Guidelines Section 15355:

'Cumulative Impacts' refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- a) The individual effects may be changes resulting from a single project or a number of separate projects.*
- b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

The discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone (State CEQA Guidelines Section 15130(b)).

State CEQA Guidelines Section 15130(b) describes two acceptable methods for conducting a cumulative impact analysis. These two approaches include: "1) a list of past, present, and probable future projects producing related or cumulative impacts, including if necessary, those projects outside the control of the agency ['the list of projects approach'], or 2) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact ['the summary of projections approach']."

Primarily, the "summary of projections method" is used for the cumulative impact analysis and is based, in part, on information contained in the PVCCSP and Draft Environmental Impact Report, SCH No. 2009081086 (PVCCSP EIR), certified by the City of Perris City Council in 2012. It is also based on information contained in the Perris General Plan and the Perris General Plan EIR (SCH No. 2004031135), which was certified by the City of Perris City Council in April 2005 (City of Perris 2004). These documents are utilized because the geographic area addressed in the two documents encompasses not only the PVCCSP area, but all portions of the City surrounding the PVCCSP area that could be potentially

impacted by the contribution to cumulative impacts from implementation of the PVCCSP. Both documents are incorporated by reference in the PVCCSP EIR and this Draft EIR.

Where appropriate to the analysis in question, cumulative impacts are also assessed with reference to a list of cumulative projects based on the cumulative project list compiled for the Traffic Analysis (TA).

Figure 4.12-10, *Cumulative Development Location Map*, of this Draft EIR, illustrates the cumulative development location map (Urban Crossroads 2023). A summary of cumulative development projects and their proposed land uses are provided in Table 4-3 of the TA included as Appendix S of this Draft EIR. This list of projects has been used to supplement the projected cumulative development assumptions in the cumulative noise analysis.

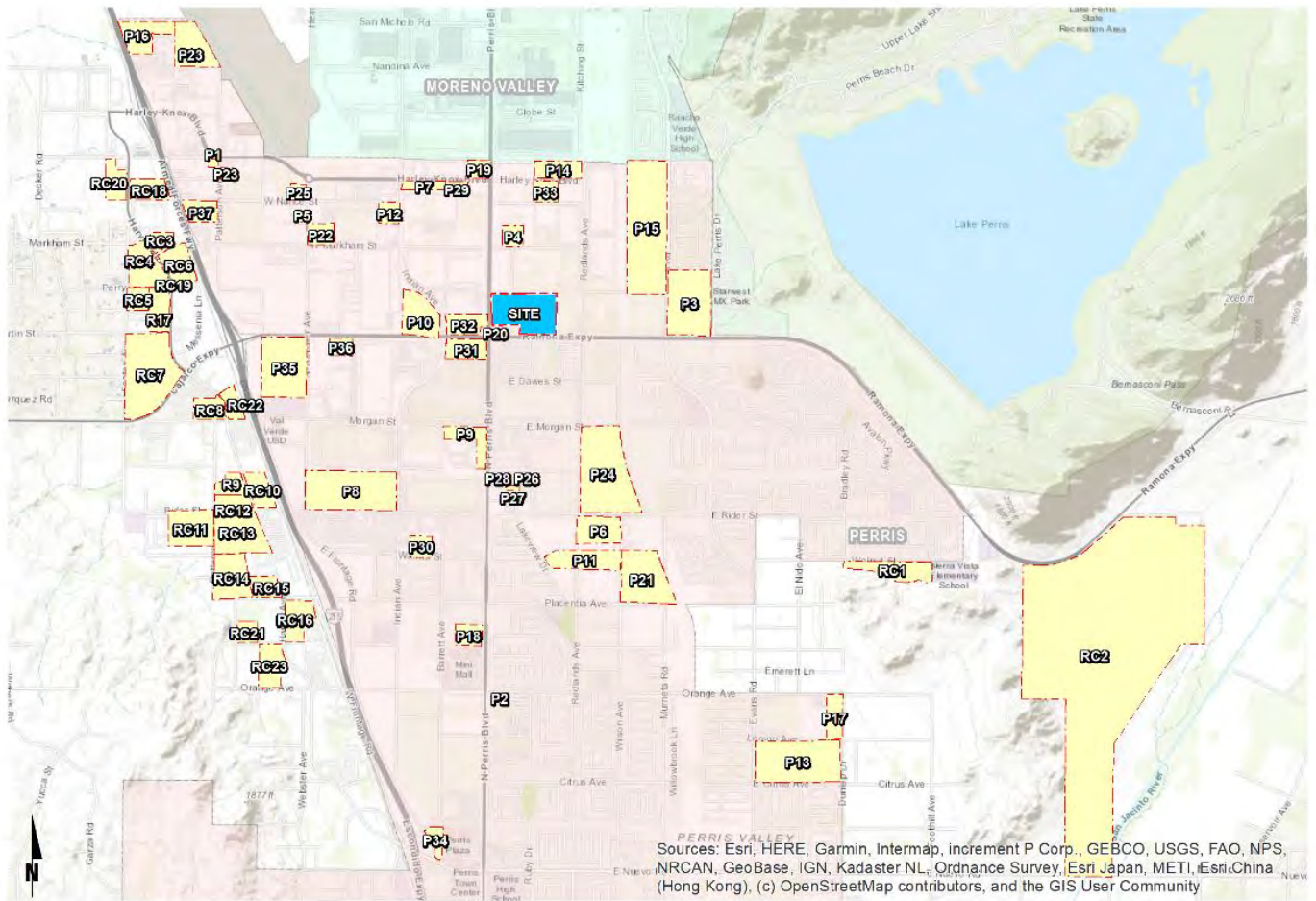
Finally, because of the nature of individual environmental factors, the cumulative area for each topical issue is not the same. The individual cumulative areas for the issues addressed in this EIR are provided in the respective impact sections. In addition to the City of Perris General Plan study area, the cumulative analysis for individual topical issues may consider specific cumulative study areas designated by respective agencies for regional or area-wide conditions. For instance, topic-specific cumulative study areas have been developed (e.g., South Coast Air Basin for air quality and the Perris Valley/San Jacinto Watershed for hydrology and water quality). Also, this EIR considers regional programs directed at mitigating cumulative impacts of development such as those instituted for urban runoff.

Identification of Impacts

Sections 4.1 through 4.14 of this Draft EIR evaluate the 14 environmental subjects warranting detailed analysis as identified in the Project NOP and in consideration of public comments. The format of discussion is standardized as much as possible in each section for ease of review. The environmental setting is discussed first, followed by applicable regulations, CEQA thresholds, and finally a discussion of the potential environmental impacts that would result from implementation of the Project (which is based on the specified thresholds of significance used as criteria to determine whether potential environmental effects are significant).

The thresholds of significance used in this EIR are based on the thresholds presented in State CEQA Guidelines Appendix G and as applied by the City of Perris. The thresholds are intended to assist the reader of this EIR in understanding how and why this EIR reaches a conclusion that an impact would or would not occur, is significant, or is less than significant.

Serving as the CEQA Lead Agency for this EIR, the City of Perris is responsible for determining whether an adverse environmental effect identified in this Draft EIR should be classified as significant or less than significant. The standards of significance used in this Draft EIR are based on the independent judgment of the City of Perris, taking into consideration State CEQA Guidelines Appendix G, the City of Perris General Plan, the City of Perris's Municipal Code and adopted City policies, performance standards adopted, implemented, and monitored by regulatory agencies, and significance standards recommended by regulatory agencies.



Source: Urban Crossroads 2022

As required by State CEQA Guidelines Section 15126.2(a), Project-related effects on the environment are characterized in this Draft EIR as direct, indirect, cumulative, short-term, long-term, on-site, and/or off-site impacts. A summarized “impact statement” is provided in each subsection following the analysis. Each subsection also includes a discussion or listing of the applicable regulatory criteria (laws, policies, regulations) that the Project and its implementing actions are required to comply with (if any). Where impacts are identified as significant after mandatory compliance with regulatory criteria, feasible mitigation measures are presented that would either avoid the impact or reduce the magnitude of the impact. For the impacts identified as significant and unavoidable, the City of Perris would be required to adopt a statement of overriding considerations pursuant to State CEQA Guidelines Section 15093 in order to approve the Project despite its significant impact(s) to the environment. The statement of overriding considerations would list the specific economic, legal, social, technological, and other benefits of the Project, supported by substantial evidence in the Project’s administrative record, that outweigh the unavoidable impacts.

REFERENCES

- Albert A. Webb Associates. 2011. Perris Valley Commerce Center Specific Plan Final Environmental Impact Report. November 2011, certified January 10, 2012. Available at: <https://www.cityofperris.org/Home/ShowDocument?id=2645>.
- City of Perris. 2004. Draft Environmental Impact Report City of Perris General Plan 2030, State Clearinghouse #2004031135. October 2004, certified April 26, 2005.

4.1 AESTHETICS

This section describes the existing aesthetic condition of the Project site and surrounding area. It also analyzes the visual character of the Project (such as building design and architecture, landscaping, and light and glare generation) and consistency with development standards and guidelines as outlined in the PVCCSP. Descriptions of existing visual characteristics, both on site and in the vicinity of the Project site, are provided to assess the changes in visual character resulting from the Project. The description of existing visual characteristics and the analysis of potential impacts to aesthetic resources are based on site photographs included as part of the Project's application materials, analysis of aerial photography, and Project application materials related to the proposed development that were submitted to the City of Perris and described in Section 3.0, *Project Description*, of this EIR.

There were no comments received on the 2022 or 2023 NOPs or at the July 20, 2022 Draft EIR public scoping meeting regarding aesthetics.

4.1.1 Existing Setting

4.1.1.1 Project Site and Surrounding Area

The visual character of the Project site and surrounding area is typical of areas transitioning from a rural agricultural area to industrial and other urban uses. As recommended in State CEQA Guidelines Section 15125, the environmental conditions that existed on the Project site at the time the EIR's NOP was released for public review shall comprise the site's "existing setting." The NOP for this EIR was released on July 8, 2022. Under existing conditions, the Project site is undeveloped, except for the eastern portion which includes an earthen reservoir and associated square concrete standpipe. As previously shown in **Figure 3-3, Aerial Photograph**, of this EIR, the Project site is bordered by Perris Boulevard to the west with commercial uses and vacant land further west beyond Perris Boulevard; industrial and warehouse uses to the north; undeveloped, vacant land and warehouse and industrial uses to the east; undeveloped and vacant land, commercial uses, a mobile home park, and an RV camping lot within the area to the south. A gas station and commercial uses are located immediately adjacent to the southwest of the Project site.

Under existing conditions, the Project site does not support uses that create light or glare. Existing sources of light from the surrounding land uses primarily include security lighting associated with adjacent industrial uses and headlights from trucks and passenger vehicles. There are no existing buildings or manufactured features on site or in the Project vicinity that are constructed of materials that cause glare. As identified in Section 12.0, Airport Overlay Zone, of the PVCCSP, the Airport Overlay Zone for the MARB/IPA extends through the central part of the PVCCSP area. The Project site is located approximately 1.4 miles south of MARB/IPA and is located within the Airport Overlay Zone. Development of the Project site is required to comply with applicable regulations to ensure that MARB/IPA operations are not affected by light or glare from the proposed uses; this issue is addressed in Section 4.8, Hazards and Hazardous Materials, of this EIR.

4.1.1.2 Topographic and Vegetational Features

The Project site is situated in the Perris Valley between the San Jacinto and Santa Ana Mountains. The Project site is generally flat with elevations ranging between 1,450 and 1,460 feet amsl, with stormwater runoff generally flowing to the southeast. An existing drainage swale is located along the north side of

Ramona Expressway (i.e., along the southern edge of the Project site), which is owned and maintained by the RCFCWCD and runs in an east-west direction connecting to the Perris Valley Storm Drain located about 1,850 feet to the east of the Project site.

The Project site is vacant and is primarily comprised of disturbed vegetation and habitat that is dominated by a low carpet of non-native grass and weeds. Native vegetation and habitats within Project site boundaries have been eliminated due to long-term disturbances associated with agricultural uses and weed abatement activities. The resulting site condition is heavily disturbed with compacted surface soils. One large detention basin is present in the western portion of the site, where wind-blown trash accumulates. The vacant Project site is also used for illegal trash dumping. An abandoned water stack likely associated with previous agricultural uses is in the central portion of the Project site.

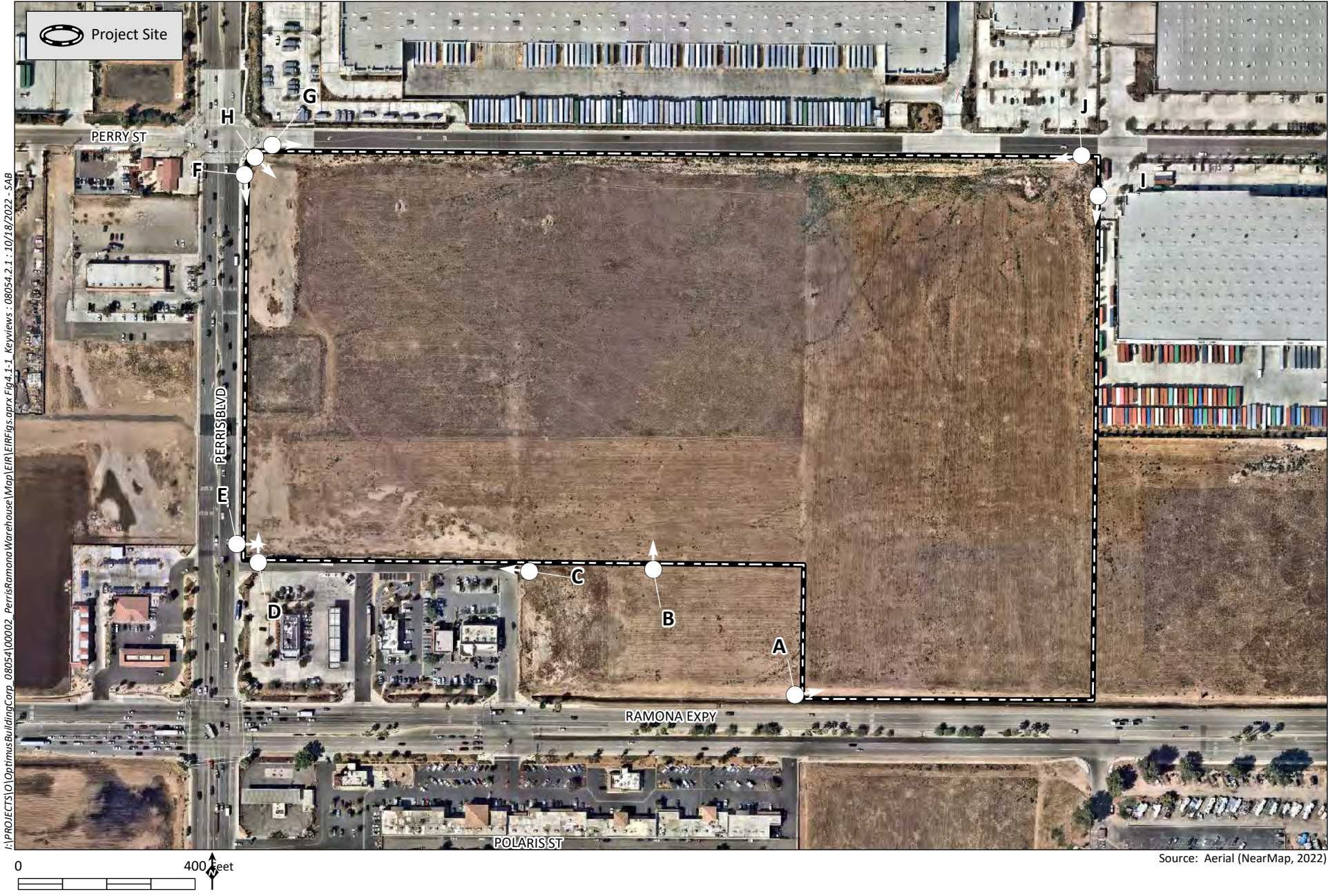
The Project site drains gradually from the northwest portion of the site to the southeast, over varying terrain with a flow slope of 0.3 percent. The runoff from the site is primarily overland flow of downslope movement of stormwater runoff (sheet flow) originating on the slightly higher elevated terrain in the northern and western portions of the Project site. There are no natural water courses on the Project site. The San Jacinto River is located approximately 4.5 miles southeast of the Project site.

4.1.1.3 Visual Character of the Site and Surrounding Area

Site photographs were taken to document the existing visual character and views of the Project site and surrounding areas. These photographs were taken from ground level public vantage points at ten locations from the Project site perimeter. The location of each photograph, as well as the direction of the view for each photograph is depicted on **Figure 4.1-1, Key Views**. Key photographs are depicted in **Figure 4.1-2, Key View Photographs**. The views and descriptions of the Project site and surrounding areas are described in more detail below for each photograph.

Photo A. Photo A depicts the southeast portion of the Project site, as viewed from the Project boundary along Ramona Expressway, looking east, into the Project site. Views from this location provide views of the Russell Mountains and Bernasconi Hills in the distance; with Ramona Expressway, street trees, and ornamental trees associated with a property on the south side of Ramona Expressway and adjacent warehouse uses to the north visible in the middle ground of the photo. The foreground of the photo consists of the southeast portion of the Project site, which contains a combination of disturbed vegetation, bare ground, and small amounts of litter/debris.

Photo B. Photo B was taken from the southern boundary of the Project site, approximately 300 feet north of Ramona Expressway, and approximately 500 feet east of the adjacent commercial uses. Photo B contains views of the middle portion of the Project site, from the southern boundary, looking north into the Project site. Views from this location consists of partial views of the Russell Mountains and Bernasconi Hills in the distance, with intervening adjacent warehouse uses blocking partial views of the Russell Mountains and Bernasconi Hills. Views of the Project site from this location are generally consistent with those shown in Photo A and consists of a combination of disturbed vegetation and bare ground. Small amounts of litter and debris are also present in this portion of the Project site.



Source: Aerial (NearMap, 2022)

PHOTO A



View of southeast portion of property looking east

PHOTO B



View of middle portion of property looking north

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PHOTO C



View of middle portion of property looking west. Starbucks and Shell Station to the left

PHOTO D



View of property from the southwest corner looking north along Perris Blvd

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Photo C. Photo C was taken from the southern boundary of the Project site, directly adjacent to the existing commercial uses at the northeast corner of Perris Boulevard and Ramona Expressway, looking west along the southern Project site boundary. The driveway for the adjacent commercial uses is visible in the foreground on the left side of the photo, with the southwest portion of the Project site also visible in the foreground on the left side of the photo. This portion of the Project site is characterized by bare ground, disturbed vegetation, and debris along the property line. Adjacent land uses including a warehouse and a small commercial center are visible to the east beyond the Project site and adjacent Perris Boulevard. Ornamental trees associated with adjacent uses are also visible beyond the boundaries of the Project site. Views in the distance are obstructed by intervening uses, associated ornamental trees, and trucks travelling along Perris Boulevard.

Photo D. Photo D was taken from the southwest corner of the Project site, along the southern property line near Perris Boulevard, north of the existing commercial uses at the northeast corner of Perris Boulevard and Ramona Expressway, and contains views looking north into the Project site along Perris Boulevard. Views of the Project site from this location show bare ground with heavy disturbance. Adjacent warehouse uses are present to the north of the Project site. Perris Boulevard and commercial uses on the west side of Perris Boulevard are present on the left side of the photo. Existing streetlights, utility lines, and a sidewalk are present along the western Project site boundary. Distant views are limited from those location, due to intervening structures, trees, utility poles, and streetlights.

Photo E. Photo E was taken from the southwest corner of the Project site, in a similar location to Photo D, but contains views looking east from the view location. The Project site's southern boundary and the driveway for adjacent commercial uses is present on the right side of the photo. Most of the foreground of this photo consists of views into the Project site, consisting of bare ground, with disturbed vegetation present on the Project site, farther in the distance. Adjacent warehouse uses to the north of the Project site are visible in this photo.

Photo F. Photo F was taken from the northwest corner of the Project site, looking south along the western property line. The undeveloped Project site is shown, with bare ground in the foreground, and disturbed vegetation on the Project site visible towards the southern portion of the Project site. Traffic and utility lines along Perris Boulevard are present in the right-hand portion of the photo. Ornamental trees on adjacent land uses are present on the west side of Perris Boulevard, and in the distance, south of the Project Site. Adjacent commercial uses located south of the Project site are visible in the distance.

Photo G. Photo G was taken from the northwest corner of the Project site, looking west along the northern property line. Perry Street and a sidewalk adjacent to the Project site are visible in the photo, along with the vacant Project site consisting of bare ground and disturbed vegetation. Adjacent and nearby warehouse uses are visible beyond the Project site, and ornamental trees associated with the RV park southeast of the Project site, south of Ramona Expressway are visible in the distance. Additionally, views of the Russell Mountains and Bernasconi Hills are visible in the distance, with intervening development partially obstructing views.

Photo H. Photo H was taken from the northwest corner of the Project site, looking southwest into the middle of the Project site. Views of the Project site consists of bare ground in the foreground of the photo, with disturbed vegetation visible further interior of the Project site. Ornamental trees associated with the RV park southeast of the Project site and south of Ramona Expressway are visible in the distance. Adjacent commercial uses located south of the Project site are visible in the distance.

PHOTO E



View of property from the southwest corner looking east

PHOTO F



View of property from the northwest corner looking south along Perris Blvd

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View of property from the northwest corner looking east along Perry Street



View of property from the northwest corner looking southeast

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Photo I. Photo I was taken from along the Project's eastern boundary, near the northeast corner of the Project site, looking south along the Project boundary. Views of the eastern portion of the Project site are visible in this photo, consisting of flat land covered by disturbed vegetation. The warehouse adjacent to the east of the Project site is visible, with a wood and block wall fence separating the two properties. Ornamental trees are located on the adjacent property, with the top portions of the trees visible above the dividing fence. The commercial uses located south of the Project site and the trees associated with the RV park south of Ramona Expressway are visible in the distance.

Photo J. Photo J was taken from the northeast corner of the Project site, looking west along the northern Project boundary, adjacent to Perry Street. Perry Street, the adjacent sidewalk, and the vacant Project site dominate this photo, with indistinguishable adjacent uses and ornamental trees visible in the distance.

4.1.1.4 Scenic Highways

There are no State or County designated scenic highways within the Project vicinity (California Department of Transportation [Caltrans] 2022). While there are three officially designated state scenic highways in Riverside County, including portions of State Route (SR) 62, SR 74, and SR 243, none of these designated state scenic highways are near the Project site (i.e., the nearest designated highway is a portion of SR 74 east of the City of Hemet, located approximately 19 miles from the Project site).

4.1.1.5 Public Views of the Project Site

Due to the relatively flat topography of the Project site and surrounding area, and existing development surrounding the Project site, views of the Project site are largely limited to vantage points adjacent to the site. Public views of the Project site occur from adjacent roadways. Given the nature of surrounding land uses, it is expected that most of the public views of the Project site would be associated with motorists, bicyclists, and pedestrians traveling on roadways adjacent to the Project, including Ramona Expressway, Perris Boulevard, and Perry Street.

The planned Ramona Expressway trail, as delineated in the PVCCSP, is located on the north side of Ramona Expressway, and traverses the PVCCSP area in an east/west manner from the PVCCSP western boundary adjacent to I-215 to the eastern PVCCSP boundary at the Perris Valley Storm Channel. This planned trail is located directly adjacent to the Project site, on the north side of Ramona Expressway, abutting the southern boundary of the Project site.

4.1.1.6 PVCCSP Visual Overlay Zone

The PVCCSP establishes a Visual Overlay Zone in the PVCCSP area. The Visual Overlay Zone occurs along the portion of I-215 within the PVCCSP boundaries and along major roadways inside the PVCCSP area, including Ramona Expressway and Perris Boulevard, which are both directly adjacent to the Project site. The Visual Overlay Zones for the Project site include the field of vision from Ramona Expressway and Perris Boulevard to the buildings. The PVCCSP places an emphasis on these zones to ensure the aesthetic enhancement of these areas.



View of property from the northeast corner looking south



View of property from the northeast corner looking west along Perry Street

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4.1.2 Existing Policies and Regulations

Following is a discussion of relevant policies and regulations applicable to development in the City of Perris, including the Project site. Development of the Project is also required to comply with the PVCCSP's Design Standards and Guidelines related to aesthetics and visual character, which are identified in Section 4.1.2.3, below.

4.1.2.1 Local

County of Riverside Ordinance No. 655

In the absence of a specific City regulation for the purpose of protecting astronomical observation and research, the City applies Riverside County Ordinance No. 655 to projects. On June 7, 1988, the County of Riverside Board of Supervisors adopted Ordinance No. 655, which restricts the permitted use of certain light fixtures emitting light into the night sky that may have a detrimental effect on astronomical observation and research. This ordinance establishes two zones in which different lamp types are allowed or prohibited: Zone A is the area within a 15-mile radius of Palomar Observatory and Zone B is the area that extends from the outer limit of Zone A to 45 miles from Palomar Observatory. The Project site is located within Zone B. This Ordinance includes specific standards for lighting fixtures installed along public roadways and in other common areas and applies to all new development. The use of low-pressure sodium lamps is encouraged where possible by Ordinance No. 655, and the Ordinance also requires the shielding of all nonexempt outdoor lighting fixtures, specifies the hours of operation for non-exempt outdoor lighting fixtures, and regulates lighting fixtures used to illuminate an outdoor advertising display (Riverside County 1988).

City of Perris General Plan

There are no goals, policies, and supporting measures included in the City of Perris General Plan that are specific to aesthetics and applicable to the Project.

4.1.2.2 Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to aesthetics/visual character and lighting. These Standards and Guidelines summarized below are incorporated as part of the Project and are assumed in the analysis presented in this section. The Project is required to comply with these Standards and Guidelines. The chapters/section numbers provided correspond to the PVCCSP chapters/sections.

On-Site Design Standards and Guidelines (Chapter 4.0 of the PVCCSP)

4.1 Perris Valley Commerce Center On-Site Development Standards

To ensure the orderly, consistent, and sensible development of the PVCCSP, land use standards and design criteria have been created for each land use category, and are summarized in Table 4.0-1, Development Standards by Land Use, of the PVCCSP. A summary of the standards applicable to Aesthetics for industrial projects within the PVCCSP area is provided below.

4.2 On-Site Standards and Guidelines

4.2.1 General On-Site Project Development Standards and Guidelines

- Uses and Standards Shall Be Developed in Accordance with the Specific Plan
- Uses and Standards Shall Be Developed in Accordance with City of Perris Codes
- Development Shall Be Consistent with the Perris Valley Commerce Center Specific Plan
- No Changes to Development Procedures Allowed Except as Outlined in the Specific Plan
- Visual Overlay Zones

4.2.2 Site Layout for Commercial Zones

- 4.2.2.1 Building Orientation/Placement: Building Frontages/Entrances; Distinct Visual Link; Create Diversity and Sense of Community; and Utilize Building for Screening
- 4.2.2.4 Parking and Loading: Screening Parking Lot
- 4.2.2.5 Screening: Screen Loading Docks; Screening Methods; Screen Outdoor Storage Areas; Work Areas, etc.
- 4.2.2.6 Outdoor Storage: No Outdoor Storage Permitted Other Than as Specified
- 4.2.2.7 Water Quality Site Design: Best Management Practice (BMP) Features in “Visibility Zone”

4.2.3 Architecture

- 4.2.3.1 Scale, Massing and Building Relief: Scaling in Relationship to Neighboring Structures; Variation in Plane and Form; Project Identity; Do Not Rely on Landscaping; Distinct Visual Link; Break Up Tall Structures; Avoid Monotony; Avoid Long, Monotonous and Unbroken Building Facades; Provide Vertical or Horizontal Offsets; and Fenestration
- 4.2.3.2 Architectural Elevations and Details: Primary Building Entries; Elements of a Building; Large Sites with Multiple Buildings; Discernible Base, Body and Cap; Visual Relief; and, Building Relief
- 4.2.3.3 Roofs and Parapets: Integral Part of the Building Design; Overall Mass; Varied Roof Lines; Form and Materials; Avoid Monotony; Variation in Parapet Height; Flat Roof and Parapets; and Conceal Roof Mounted Equipment
- 4.2.3.5 Color and Materials: Facades; Building Trim and Accent Areas; Metal Siding; and High-Quality Natural Materials

4.2.4 Lighting

- 4.2.4.1 General Lighting: Safety and Security; Lighting Fixtures Shield; Foot-candle Requirements Sidewalks/Building Entrances; and Outdoor Lighting

- 4.2.4.2 Decorative Lighting Standards: Decorative Lights; Complimentary Lighting Fixtures; Monumentation Lighting; Compatible with Architecture; Up-Lighting; Down- Lighting; Accent Lighting; and High-Intensity Lighting
- 4.2.4.3 Parking Lot Lighting: Parking Lot Lighting Required; Foot-candle Requirements Parking Lot; Avoid Conflict with Tree Planting Locations; Pole Footings; and Front of Buildings and Along Main Drive Aisle

4.2.5 Signage Program

- 4.2.5.1 Sign Program: Multiple Buildings and/or Tenants; Major Roadway Zones/Freeway Corridor; Location; Direct On-Site Traffic Circulation; Monument Signs; Address Identification Signage; Neon Signage; and Prohibited Signs

4.2.6 Walls/Fences

- Specific Purpose
- Materials
- Avoid Long Expanses of Monotone Fence/Wall Surfaces
- Most Walls Not Permitted within Street Side Landscaping Setback
- Height
- Gates Visible from Public Areas
- Prohibited Materials

4.2.7 Utilities

- Utility Connections and Meters
- Pad-mounted Transformers and Meter Box Locations
- Electrical, Telephone, CATV and Similar Service Wires and Cables
- Electrical Transmission Lines
- All Equipment Shall be Internalized

4.2.9 Visual Overlay Zone Development Standards and Guidelines

- 4.2.9.2 Major Roadway Visual Zones: Quality Architectural Presence; Full-Building Articulation and Enhancement; Integrated Screenwall Designs; Enhanced Landscape Setback Areas; Enhanced Entry Treatment; Entry Point; Screening, Loading and Service Areas; Limit or Eliminate Landscaping Along Side or Rear Setbacks; Uplight Trees and Other Landscape; Landscaped Accent Along Building Foundation; Heavily Landscape Parking Lot; and Limited Parking Fields

Landscape Standards and Guidelines (Chapter 6.0 of the PVCCSP)

6.1 On-Site Landscape General Requirements

- Unspecified Uses
- Perimeter Landscape
- Street Entries
- Slopes
- Main Entries, Plaza, Courtyards
- Maintenance Intensive/Litter Producing Trees Discouraged
- Avoid Interference with Project Lighting/Utilities/Emergency Apparatus
- Scale of Landscape
- Planters and pots
- MWD Trail Buffer

6.1.1 On-Site Landscape Screening

- Plant Screening Maturity
- Screenwall Painting
- Trash Enclosures

6.1.2. Landscape in Parking Lots

- Minimum 50% Shade Coverage
- Planter Islands
- Parking Lot Screening
- One Tree per Six Parking Spaces
- Concrete Curbs, Mow Strips or Combination
- Planter Rows Between Opposing Parking Stalls or Diamond Planters
- Pedestrian Linkages

6.1.3 On-Site Plant Palette

6.2 Off-Site Landscape General Requirements

6.2.1 Streetscape Landscape

- Secondary Arterial (with Striped Median)

Commercial Design Standards and Guidelines (Chapter 7.0 of the PVCCSP)

7.2 Commercial Development Standards and Guidelines

7.2.1 Commercial Site Layout

- 7.2.1.3 Parking and Loading: Disperse Parking Area, Limited Store Front Parking
- 7.2.1.5 Outdoor Storage: Outdoor Storage Restrictions
- 7.2.1.6 Outdoor Display: Extension of Indoor Display Areas

7.2.2 Architecture

- 7.2.2.1 Scale, Massing, and Building Relief: Project Identity; Building Entrances; Attractive Facades; and Avoid Single, Large Dominant Building Mass
- 7.2.2.2 Architectural Elevations and Details: Primary Building Entries, Geometric Variation, Windows, and Storefronts
- 7.2.2.3 Color and Materials: Window Glazing

7.2.3 Lighting

- Low wattage down-lighting

7.2.4 Signage

- Perris Valley Commerce Center Logo

Industrial Design Standards and Guidelines (Chapter 8.0 of the PVCCSP)

8.2 Industrial Development Standards and Guidelines

8.2.1 Industrial Site Layout

- 8.2.1.1 Orientation/Placement: Industrial Operations
- 8.2.1.4 Employee Break Areas and Amenities: Outdoor Break Areas
- 8.2.1.5 Screening: Truck Courts

8.2.2 Landscape

- No Landscape in Screened Truck Courts

Airport Overlay Zone (Chapter 12.0 of the PVCCSP)

12.1.3 Compatibility with March ARB/IP ALUCP

- Lighting plans

The PVCCSP EIR does not include mitigation measures relevant to the analysis of aesthetics impacts; however, it does include mitigation measures to address potential hazards to MARB/IPA operations that are also relevant to the analysis of light and glare impacts. These mitigation measures are incorporated as part of the Project and assumed in the analysis presented in this section. These mitigation measures will be included in the MMRP for the Project.

MM Haz 3 Any outdoor lighting installed shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane.

MM Haz 5 The following uses shall be prohibited:

- (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.
- (d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.
- (e) All retention and water quality basins shall be designed to dewater within 48 hours of a rainfall event.

4.1.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, a project would normally have a significant adverse environmental impact on aesthetic/visual character and lighting if the project would:

- a) Have a substantial adverse effect on a scenic vista;
- b) Substantially degrade scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway;
- c) In an urbanized area, conflict with applicable zoning and other regulations governing scenic quality; and

- d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

4.1.4 Environmental Impacts

Threshold a: Would the project have a substantial adverse effect on a scenic vista?

Impact Analysis

Scenic vistas are generally defined as public viewpoints that provide expansive or notable views of a highly valued landscape and are typically identified in planning documents, such as a general plan, but can also include locally known areas or locations where high-quality public views are available. The PVCCSP EIR Initial Study (Section 13.0, Aesthetics) concluded that the PVCCSP area is not located within a scenic vista, nor will the development of the PVCCSP, including the change in land uses, have an adverse effect on a scenic vista. The PVCCSP EIR Initial Study concludes that 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 (City of Perris 2009). However, views of natural landforms are available throughout the City, such as Lake Perris Dam, the Russell Mountains and Bernasconi Hills (all of which are located approximately four miles east of the Project site), and Gavilan Hills and Motte-Rimrock Reserve (located about four and six miles southwest of the Project site, respectively).

Impacts on scenic vistas can result from development directly diminishing the scenic quality of the view or by blocking view corridors. Due to the relatively flat and broad nature of the City's topography, including the Project site and immediately surrounding areas, Section 6.1 of the City's General Plan EIR identified that "virtually all future building construction consistent with land use and development standards... will obstruct views to the foothills from at least some vantage points." The City's General Plan EIR concludes that the City's east-west and north-south oriented roadways are intended to frame and preserve scenic views towards distant horizons and foothills.

The Project site is relatively flat and undeveloped with little topographical change and sparse vegetation. Development at the Project site would include warehouse and commercial development not to exceed 50 feet and 45 feet, respectively, in height. Landscaping is proposed to cover 12.3 percent of the site and would contribute to preserving roadway corridors that also support scenic views. Project landscaping would adhere to the landscaping requirements of the PVCCSP (contained in Chapter 6.0, *Landscape Standards and Guidelines*, of the PVCCSP). While the PVCCSP contains lists of proposed on- and off-site plant palettes, the PVCCSP indicates that plants other than those listed in the PVCCSP may be used to satisfy design or horticultural needs consistent with the Project's objectives and would be subject to review and approval by the City. The City's review of the landscaping plan would ensure that the plant species proposed for the Project site would not further block or degrade views. As a result, the Project would not directly impact a scenic vista, nor would development of the site substantially block or diminish a scenic vista. While building construction would be consistent with land use development standards, implementation of the Project would still result in the obstruction of views of the foothills from at least some vantage points as concluded in the City's General Plan EIR. However, the Project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold b: Would the project substantially degrade scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact Analysis

The PVCCSP EIR Initial Study (Section 13.0, Aesthetics) concluded that no specific scenic resources such as trees, rock outcroppings, or unique features exist within the PVCCSP boundaries, which includes the Project site, and that the PVCCSP area is not located within a state scenic highway corridor (City of Perris 2009). Consistent with the findings in the PVCCSP EIR Initial Study, the Project site is not located within the vicinity of scenic highways and no scenic resources are located on the Project site. Further, while there are three officially designated state scenic highways in Riverside County, including SR 62, SR 74, and SR 243, none of these designated state scenic highways are near the Project site (i.e., the nearest designated highway is a portion of SR 74 east of the City of Hemet, located approximately 19 miles from the Project site).

It should be noted that the Project site is located adjacent to Major Roadway Visual Corridors along Ramona Expressway and Perris Boulevard, as identified in Figure 4.0-17, Visual Overlay Zone, of the PVCCSP (City of Perris 2022). These roadway corridors also include Redlands Avenue, Rider Street, and Morgan Street. As such the Project would be required to comply with the Design Standards and Guidelines outlined in the PVCCSP, including restrictions on building height and landscaping, as further discussed under Threshold c, below.

Given that the Project site is not visible from an officially designated state scenic highway and no unique scenic resources exist on-site, the Project would not result in an impact to scenic resources within a state scenic highway. No impact would occur.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

No impact would occur.

Threshold c: Would the project, in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality?

Impact Analysis

The PVCCSP EIR Initial Study (Section 13.0, Aesthetics) identifies that development of future projects in the PVCCSP area would change the visual character of the PVCCSP area from scattered residential, commercial, industrial, and agricultural uses to a more modern commerce and industrial center. Further, the PVCCSP EIR Initial Study concludes that projects developed in compliance with the Design Standards and Guidelines of the PVCCSP would not substantially degrade the existing visual character or quality of the area or surrounding properties, resulting in a less than significant impact for this threshold of

significance (City of Perris 2009). Chapter 4.0 (On-Site Design Standards and Guidelines) of the PVCCSP identifies techniques and minimum standards for achieving the level of design quality that the City desires in new development within the PVCCSP area and addresses site layout for commerce zones, architecture, and visual overlay zone development standards and guidelines. Chapter 6.0 (Landscape Standards and Guidelines) outlines general on-site and off-site landscape requirements within the PVCCSP area. Chapter 7.0 (Commercial Design Standards and Guidelines) provides guidance on commercial site layout and landscaping. Chapter 8.0 (Industrial Design Standards and Guidelines) provides guidance on industrial site layout and landscaping.

Therefore, the following analysis addresses the visual change resulting from the Project and addresses the Project's compliance with the relevant PVCCSP Standards and Guidelines identified above, which are in place to ensure that future developments have aesthetic cohesiveness, incorporate superior architectural design, and improve the visual character within the PVCCSP area.

The visual impacts of a project include both the objective visual resource change created by the project and the subjective viewer response to that change. Distance from a project, frequency of view, length of view, viewer activity, viewer perception, and viewing conditions contribute to the assessment of a visual impact. The perception of different viewer groups to the visual environment and its elements varies based on viewer activity and awareness. Activities such as commuting in traffic can distract an observer from many aspects of the visual environment. Off-site views for motorists are short-lived. Conversely, pleasure driving or relaxing in a scenic environment can encourage an observer to look at the view more closely and at greater length, thereby increasing the observer's attention to detail. Sensitivity is also determined by how much the viewer has at stake in the viewshed. Typically, people who reside or own property in an area are more sensitive to change than those just passing/commuting through an area.

The existing visual character of the Project site and surrounding area is characterized by urbanizing commercial and industrial land uses that have been implemented according to the PVCCSP, which was developed to transition a formerly agricultural area to a modern-day regional commerce center. Development immediately surrounding the vacant and undeveloped Project site includes a gas station, commercial retail development, and warehouse buildings, as well as vacant and undeveloped land.

Due to the relatively flat topography of the Project site and surrounding area, and existing development surrounding the Project site, views of the Project site are largely limited to vantage points adjacent to the site. The photographs presented in 4.1-2a through 4.1-2e depict the existing visual character of the Project site and surrounding area. These photographs were taken from public vantage points adjacent to the Project site and are representative of public views from adjacent roadways, from the adjacent commercial uses at the northeast corner of the Perris Boulevard/Ramona Expressway intersection, from Ramona Expressway, and from the driveway of the warehouse adjacent to the east of the Project site. Given the nature of surrounding land uses, it is expected that most of the public views of the Project site would be associated with motorists, bicyclists, and pedestrians traveling on roadways adjacent to the Project: Ramona Expressway, Perris Boulevard, and Perry Street.

Development of the Project site would involve the construction and operation of the following uses on the currently vacant Project site: one warehouse building with associated truck trailer and automobile parking lots, landscaping, and infrastructure, commercial uses, and the future development of 4.8 acres of commercial uses. Implementation of the Project would result in a permanent and obvious change in the visual character of the site from its current condition (i.e., vacant land) to an urban setting with

industrial warehouse/distribution and commercial uses. The site would be developed in compliance with the Standards and Guidelines outlined in the PVCCSP.

It is conservatively assumed the Project's entire construction phase, including the industrial and both commercial retail areas, would occur in one phase, lasting approximately 11 months. The property would be prepared for construction and mass graded, and underground utility infrastructure would be installed. Next, surface materials would be poured, and the proposed buildings would be constructed or erected, connected to the underground utility system, and painted. Lastly, fine grading would occur, and landscaping and fencing/walls would be installed. Changes to the visual appearance of the Project site during construction would include the presence of worker vehicles, construction equipment, materials, and workers at the Project site as well as the visual changes that would occur during earth moving activities and construction of the proposed structures. Project-related construction activities would be temporary in nature and all construction equipment would be removed from the Project site following completion of the construction. Temporary construction-related changes to local visual character would not substantially degrade the visual quality or character of the area; construction activity is common throughout developing areas of the City of Perris. Additionally, the adjacent commercial and warehouse uses would not be sensitive to temporary visual changes during construction activities.

The Project site is zoned for commercial uses by the PVCCSP, and the proposed Project would therefore require an amendment to the PVCCSP to allow for light industrial uses for the warehouse portion of the Project site. The Project would, therefore, be required to comply with the applicable site development criteria governing scenic quality contained within the PVCCSP such as height limitations and setbacks for both commercial and light industrial uses.

As identified above, Section 4.2.3 of the PVCCSP provides on-site Standards and Guidelines specifically related to architecture. The proposed warehouse building is designed to comply with these requirements, including scale, massing, and building relief, architectural elevations and details, roofs and parapets, and color and materials. **Figure 4.1-3, Warehouse Elevations**, show the conceptual building elevations for the Project. While the warehouse building's final design may differ slightly from the conceptual elevations provided in this figure, they are sufficient to assess the effect that the Project's development may have on the aesthetic character of the Project site and its surrounding area. The proposed building would be a maximum of 50 feet in height above the exterior finish grade level at the top of parapet, although the roof height would vary based on the building's architectural features. These structures would be of similar height to the surrounding warehouse buildings. The maximum structure height for development within the PVCCSP-designated Light Industrial areas is 50 feet (as identified in Table 4.0-1 of the PVCCSP).

The primary form of the proposed building would be painted concrete tilt-up panels. The finish of the building would have low reflectance characteristics. In general, the architectural style consists of modern industrial design. The exterior color palette would be comprised of various shades of white and gray with accent colors. The office entry areas would feature a stone veneer. The buildings have been designed with multiple areas of geometric form to provide variation in building plane and form. As shown by the building elevations, visual relief from massive building form would be achieved through fenestration, through the incorporation of windows, mullions, exterior canopies at the office entries, and through variations in height and rooflines, and the use of parapets. These various architectural elements would effectively avoid monotony and repetition in building elevations. It should also be noted that rooftop equipment would be screened behind the parapet and would not be visible from adjacent streets.



PERRY STREET ELEVATION - NORTH ELEVATION



EAST ELEVATION



RAMONA EXPRESSWAY ELEVATION - SOUTH ELEVATION



PERRIS BLVD. ELEVATION - WEST ELEVATION

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Source: HPA Architecture, 2021

Warehouse Elevations

Figure 4.1-3

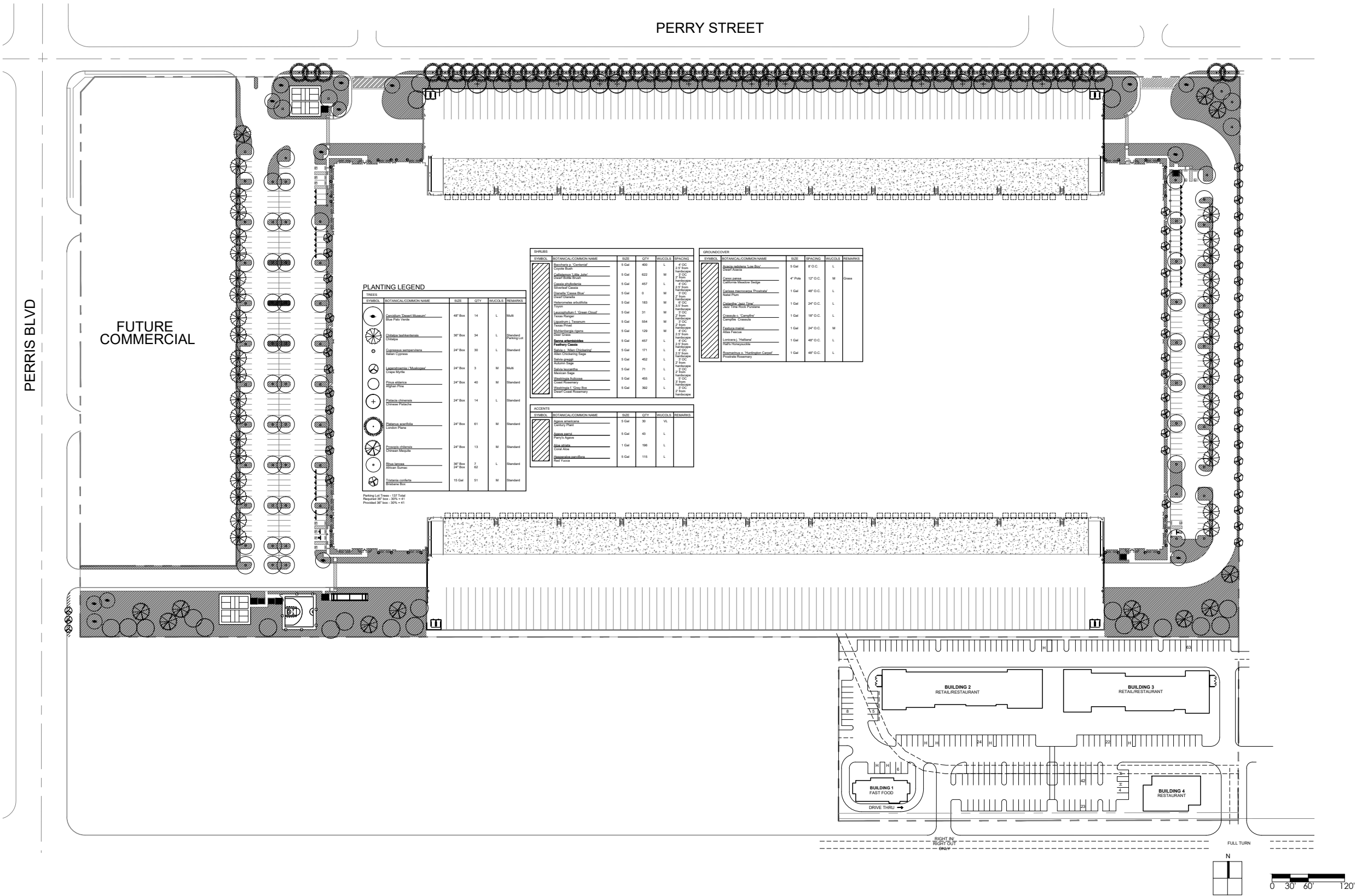
A key component of the PVCCSP related to visual character is the establishment of a Visual Overlay Zone (refer to Figure 4.0-17 of the PVCCSP) along I-215 and major roadways to provide travelers with the impression of a high caliber, well-planned industrial community. This, in part, is accomplished through the provision of landscaped thoroughfares. Design Standards and Guidelines are provided to enhance the “visual zone,” which includes the field of vision from the roadway to the buildings.

The conceptual landscape plans for the proposed Project are shown in **Figure 4.1-4, Warehouse Landscape Plan**. Landscaped parkways would be provided along Ramona Expressway consistent with PVCCSP requirements. To obstruct views of the proposed warehouse from this thoroughfare, a 14-foot-high concrete screening wall would be provided along the entire industrial warehouse boundary between the proposed commercial and warehouse uses, and landscaping would be provided along Ramona Expressway frontage of the commercial portion of the Project site. A 14-foot-high concrete screening wall would also be provided along the warehouse facility’s Perry Street frontage on the north. Landscaping would be provided along the entire site perimeter of both the warehouse and commercial portions of the Project site, within the automobile parking areas for visual quality and shading, and at select building-adjacent locations. Approximately 12.3 percent of the warehouse portion of the Project site would be landscaped. Onsite exterior lighting would be provided throughout the warehouse and commercial portions of the Project site as required for security and wayfinding.

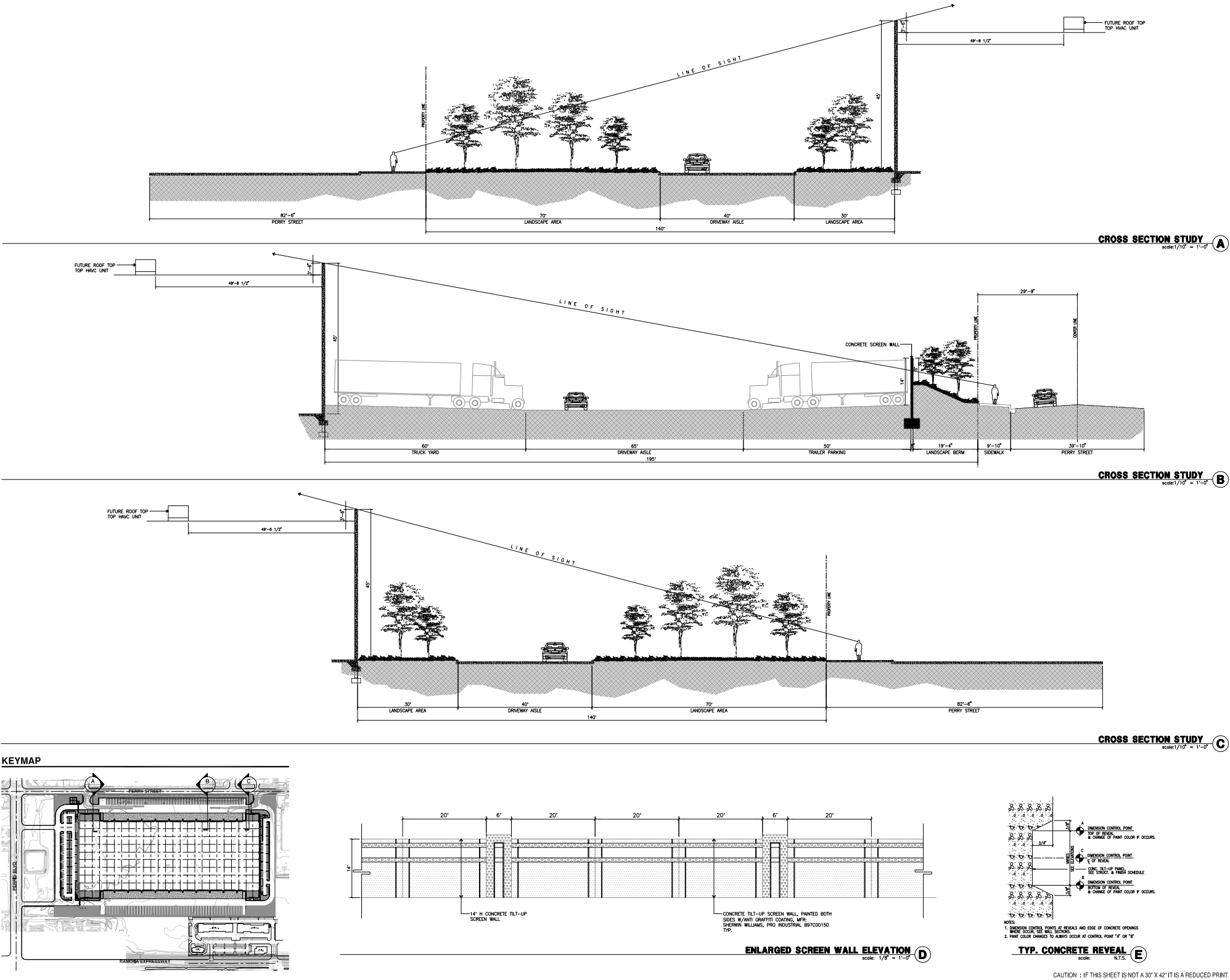
As discussed, the public views of the Project site would consist of motorists, bicyclists, or pedestrians on surrounding roadways. **Figure 4.1-5, Warehouse View Cross Sections**, illustrates views into the Project site from Perry Street. As shown, the proposed warehouse building would be 140 feet from the Project boundary along Perry Street at cross section locations A and C, and would be approximately 194 feet from the Project boundary at cross section location B. At cross section locations A and C, which are at the western and eastern ends, respectively, of the proposed warehouse building, there would be a 70-foot-wide landscape buffer adjacent to the Perry Street sidewalk, with a 40-foot drive aisle, and a 30-foot landscape area directly adjacent to the building separating viewers along Perry Street from the proposed warehouse building. As shown in **Figure 4.1-5**, line of sight to the warehouse building from a pedestrian along Perry Street would be obstructed by trees within the 70-foot landscape buffer. For cross section B, which is located along Perry Street, between cross sections A and C, and provides representative cross section view of trailer truck parking and truck dock along the northern building façade, the building would be approximately 194 feet from the property line at Perry Street. A landscaped berm, approximately 6 feet in height would be placed along this portion of the Project boundary, adjacent to Perry Street. The landscaped berm and a concrete screening wall would provide obstruction of trailer truck parking areas in the northern portion of the Project site. The proposed concrete screening wall would be 14 feet in height from the interior of the site and would extend approximately 8 feet above the landscaped berm. The proposed concrete screening wall would block views into the Project site along the portion of the Project located between the two driveways on Perry Street.

Figure 4.1-6, Commercial View Cross Sections, provide cross sections of the future commercial use on the western portion of the site (cross section A), and for the commercial uses on the south portion of the site, adjacent to Ramona Expressway (cross sections B and C). As shown in cross section A, the property for future commercial uses on the west side of the Project site extends approximately 257 feet into the Project site from Perris Boulevard.

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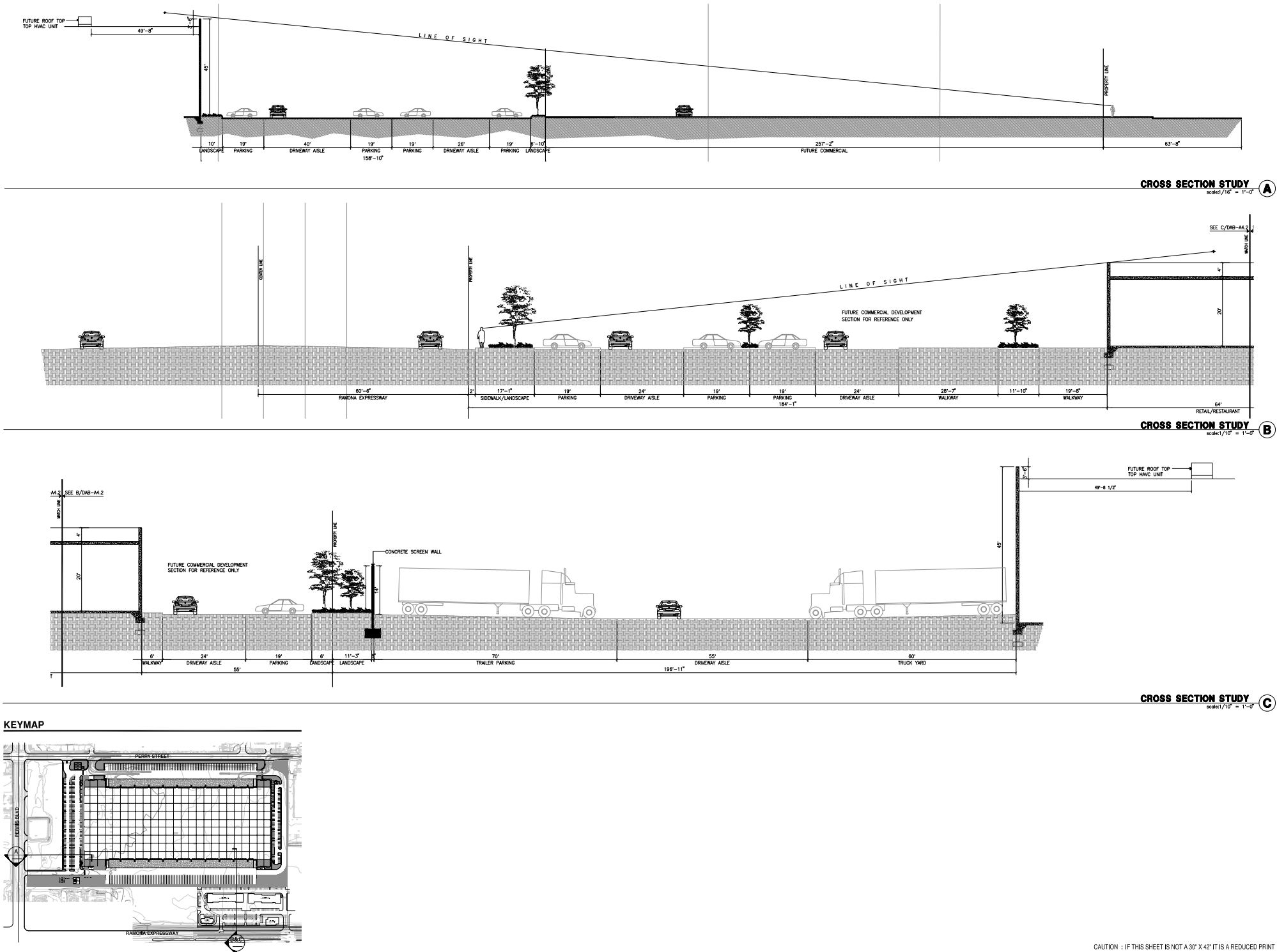


Source: Hunter Landscape, 2022



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Source: HPA Architecture, 2021



Source: HPA Architecture, 2021

There is another approximately 159 feet between the commercial parcel's eastern boundary and the proposed warehouse building, consisting of an approximately 7-foot landscaped buffer at the boundary between commercial and warehouse uses, 142 feet of parking and driveway aisles, and an additional 10-foot landscaped area adjacent to the warehouse building. As such, the proposed warehouse uses are set back approximately 416 feet from Perris Boulevard. When future commercial uses are constructed on the parcel, consistent with PVCCSP guidelines and standards, the warehouse building would be partially obstructed for viewers on Perris Boulevard. This, coupled with the two landscaped areas between Perris Boulevard and the warehouse building, and the distance between viewers on Perris Boulevard and the warehouse building would reduce the visual intrusion of the warehouse.

For the commercial uses on the southern portion of the site, two of the proposed commercial uses would be located near the frontage for Ramona Expressway, while the other two proposed structures would be located further north, adjacent to the warehouse portion of the Project. Landscaping as required by the PVCCSP would be installed along the Project frontage on Ramona Expressway, and proposed commercial structures would be consistent with PVCCSP guidelines and standards. The proposed 14-foot concrete screening wall for the warehouse portion of the Project would be set back approximately 314 feet from Ramona Expressway, with the commercial uses and associated parking and driveway aisles located between the two. Views into the warehouse portion of the site from Ramona Expressway would be limited by the 14-foot concrete screening wall, the landscape buffers between the commercial and warehouse uses, the commercial uses, and the proposed landscaping along Ramona Expressway Project frontage.

As demonstrated in the discussion above, although the visual character of the Project site would change, and an amendment to the PVCCSP to allow for light industrial uses consistent with the PVCCSP would be needed, the Project would be designed and constructed in compliance with applicable PVCCSP standards and would result in the development of the site in an attractive, well-designed manner using architectural elements, landscaping, and Project design. The streetscapes and screening adjacent to the Project site would be the primary visual focal point for motorists traveling along Ramona Expressway. Landscaping and screening would also be the primary focal points for planned Ramona Expressway trail users and other public views. Therefore, the proposed Project would not degrade the visual character or quality of public views of the Project site and its surroundings. Impacts would be less than significant.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold d: Would the Project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Impact Analysis

There are two primary artificial sources of light that generally affect an urban environment: light emanating from building interiors that passes through windows to the outside, and light from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting) that affect the natural ambient light level. The introduction of light can be a nuisance by

affecting adjacent areas and diminishing the view of the clear night sky depending on the location of the light sources and its proximity to nearby light-sensitive areas. Glare can be caused by unshielded or misdirected lighting sources. Reflective surfaces (i.e., polished metal) can also cause glare. Impacts associated with glare range from a simple nuisance to potentially dangerous situations (i.e., if glare is directed into the eyes of motorists). Glare results from development and associated parking areas that contain reflective materials such as high-efficiency window glass, highly polished surfaces, and expanses of pavement.

The PVCCSP EIR Initial Study (Section 13.0, Aesthetics) concluded that development of the PVCCSP land uses would introduce new sources of nighttime light and glare into the area from street lighting and from outdoor lighting from the planned uses, but that compliance with applicable lighting regulations and use of lighting shields and other design features on light fixtures within the PVCCSP area would ensure that impacts associated with light and glare are less than significant (City of Perris 2009).

The Project site is in a developing area with a mix of commercial and industrial development as well as vacant land that is identified for development in the PVCCSP. The existing lighting in the Project site include streetlights and vehicle lights along surrounding roadways, as well as from interior and exterior building lighting emanating from the developed commercial and industrial sites.

It should be noted that, to prevent conflicts with aircraft operations at MARB/IPA, all lighting and building materials installed as part of the Project would comply with the requirements outlined in PVCCSP EIR mitigation measures MM Haz 3 and MM Haz 5 (identified above), which are incorporated into the Project. Light fixtures are required to be hooded or shielded to prevent either the light spillover or reflection into the sky, and lights that direct a steady light or flashing light or cause sunlight to be reflected towards an aircraft during takeoff or final approach for landing are prohibited.

Light

Construction Related

Project-related construction activities would comply with applicable provisions of the City's Municipal Code. Notably, Section 7.34.060 (Construction Noise) of the City's Municipal Code prohibits construction activity that may result in "disturbing, excessive, or offensive noise levels between the hours of 7:00 PM and 7:00 AM". While construction activities are not expected to occur during these hours, nighttime lighting would be needed at certain times depending on the time of year and depending on the stage of construction. Additionally, nighttime lighting of construction staging areas would be needed to provide security for construction equipment and construction materials. This type of temporary lighting is often unshielded and may shine onto adjacent properties and roadway causing a potentially significant impact, particularly to motorists. Adjacent properties consist of undeveloped land, commercial uses, and industrial and warehouse uses, which would not be considered especially sensitive to nighttime lighting on an adjacent property. Nonetheless, unshielded, temporary lighting during construction could result in a potentially significant impact to motorists, requiring mitigation. Project-specific MM AES-1 would be implemented.

Operational Related

Development of the Project with industrial and retail uses would introduce new permanent sources of light into the area in the form of signage, building lighting, and parking lot lighting for nighttime operations, security, and safety. Lighting in loading areas would consist of building-mounted lighting.

Exterior lighting would be similar to other warehouse uses in the PVCCSP area. All development in the PVCCSP area is required to adhere to lighting requirements contained in the PVCCSP. The PVCCSP requires compliance with Riverside County Ordinance No. 655 and City of Perris Municipal Code Section 19.02.110.

As previously indicated, through its Ordinance No. 655, the County of Riverside has established two nighttime lighting zones that create a radius around the Mount Palomar Observatory. While not located in unincorporated Riverside County, astronomical observations at the Mount Palomar Observatory would be affected by cumulative increases in lighting sources. The nighttime lighting zones were created to ensure that the astronomical observations at the Mount Palomar Observatory would not be affected by light pollution coming from urban development. Zone A encompasses a 15-mile radius centered on the Mount Palomar Observatory, while Zone B encompasses a larger area with a 45-mile radius and extends from the outer limit of Zone A to the end of the 45-mile radius area. Since the Mount Palomar Observatory is located approximately 40 miles southeast of the Project site, the Project site is located within Zone B of the Mount Palomar Nighttime Lighting Policy Area. Ordinance No. 655 restricts the permitted use of certain light fixtures emitting undesirable light rays into the night sky, which may have a detrimental effect on astronomical observation and research at the Mt. Palomar Observatory. As stated in Section 5(A) of Ordinance No. 655, “low-pressure sodium lamps are the preferred illuminating source” in the Mount Palomar Nighttime Lighting Policy Area. Other types of lighting systems are permitted in parking areas if they do not exceed 4,050 lumens. Lighting “allowed” under Ordinance No. 655 must be fully shielded and focused to avoid spill light into the night sky and onto adjacent properties.

The Project would be required to comply with lighting requirements outlined in Section 4.2.4, Lighting, of the PVCCSP, which identifies that any illumination, including security lighting, shall utilize full-cutoff lighting fixtures that are directed away from adjoining properties and the public right-of-way. The PVCCSP also requires that parking area lighting associated with the Project be designed pursuant to the 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.

These lighting requirements are uniformly applied to all development in the PVCCSP area. As such, adherence to these lighting requirements would be mandatory and enforceable through the review and approval of the project plans. Adherence to the City’s PVCCSP would ensure that the Project’s lighting would not significantly affect adjacent uses. Therefore, operational lighting impacts would be less than significant, and no mitigation would be required.

Glare

Glare is caused by light reflections from pavement, vehicles, and building materials such as reflective glass and polished surfaces. During daylight hours, the amount of glare depends on the intensity and direction of sunlight. Glare can create hazards to motorists and can be a nuisance for pedestrians and other viewers. The PVCCSP Standards and Guidelines related to colors and materials (Section 4.2.3.5) encourage the use of low-reflectance facades and prohibits metal siding where visible from the public. Allowed building materials include wood, brick, native stone, and tinted/textured concrete. Further, as identified in Section 12.1.3, Compatibility with MARB/IP ALUCP, of the PVCCSP, any use that would cause sunlight to be reflected towards an aircraft engaged in a climb following takeoff or descent towards a landing at an airport is prohibited.

As identified in the building elevations presented in **Figure 4.1-3** of this EIR, the buildings would be constructed of painted concrete tilt-up panels and low-reflective materials, including low-reflective glass. Compliance with the requirements of the PVCCSP related to building materials would ensure that glare does not create a nuisance to on- and off-site viewers of the Project site or aircraft traveling to or from the MARB/IP Airport. The Project would not create a new source of substantial glare. This impact would be less than significant, and no mitigation is required.

Mitigation Measures

Project-Specific MM AES-1: Prior to the issuance of grading permits, the Property Owner/Developer(s) shall provide evidence to the City that the Contractor Specifications require that any temporary nighttime lighting installed during construction for security or any other purpose shall be downward facing and hooded or shielded to prevent security light from spilling outside the staging area or from directly broadcasting security light into the sky, or onto adjacent properties. Compliance with this measure shall be verified by the City of Perris Building Division during construction.

Level of Significance After Mitigation

With implementation of the mitigation measure identified above, this impact would be less than significant.

4.1.5 Cumulative Impacts

Development within the City of Perris, including development within the PVCCSP area, which includes the Project site, and the May Ranch and New Horizons Specific Plan area southeast of the Project site, have previously and will continue to result in the cumulative conversion of land that is currently undeveloped to a more urbanized land use. However, this is a continuing development trend occurring within the City that has been anticipated in the City's General Plan and approved Specific Plan areas. As shown in **Figure 4.10-1, Perris Valley Commerce Center Specific Plan Land Use Designations**, in Section 4.10, *Land Use and Planning*, of this EIR, the vacant parcels south, southwest, east, and west of the Project site are planned for development with Commercial uses. These parcels include related projects proposed for commercial uses (Cali Express Car Wash, JM Realty Perris and Indian, and the Perris and Ramona Warehouse). Other nearby and adjacent uses within the immediate Project vicinity are largely developed with commercial and industrial uses, including warehouses, except for the mobile home and RV parks located south of the Project site. Additionally, related projects along Ramona Expressway between I-215 and the Project site include proposed commercial, office, and business park uses, including the Ramona Gateway and the Ramona and Brennan projects.

Cumulative projects in the same viewshed as the Project would be considered to result in a cumulative aesthetic impact. Because the Project site and surrounding areas are within the PVCCSP, May Ranch and New Horizons Specific Plans areas, future development would contribute to a cumulative visual change along with the Project. The Project and other cumulative projects would be required to comply with the Standards and Guidelines identified in the respective Specific Plans and with applicable City regulations. The PVCCSP EIR concludes that development of the land uses identified in the PVCCSP, including development of the Project site, would not result in cumulative aesthetic impacts. The Project would have a less than significant impact on scenic vistas and would not result in a cumulatively considerable contribution to a significant aesthetic impact related to scenic vistas.

As previously noted, the PVCCSP area, which includes the Project site, is not located within a scenic vista. The City's General Plan EIR acknowledges that east-west and north-south roads and streetscapes preserve scenic vistas in developed areas.

The Project site and surrounding areas are not located within proximity to any State scenic highways or eligible State scenic highways. Additionally, the Project site does not contain any scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings and would have no impact to such resources. Therefore, the Project would not result in a cumulatively considerable contribution to a significant aesthetic impact related to scenic resources within a scenic highway.

As analyzed in this section, the Project would have a less than significant impact related to degradation of the visual character of the Project site. Because development in the same viewshed as the Project would be required to comply with the applicable Standards and Guidelines set forth in the PVCCSP, including requirements related to architectural design and landscaping, or similar design requirements outlined in other Specific Plans or City regulations, these projects would also conform to the overall visual theme of the area. The Project would not result in a cumulatively considerable contribution to a significant aesthetic impact related to substantial degradation of the existing visual character or quality of public views of the site.

As with existing development in the area, light and glare impacts from the Project and future development in the City, including the development allowed by approved Specific Plans, including the PVCCSP, would be reduced through the adherence to applicable lighting standards established in the respective Specific Plans and through City regulations; applicable PVCCSP and City regulations are outlined in this section. Implementation of Project-specific mitigation measure MM AES-1 would ensure that construction-related lighting impacts from the Project are also less than significant. The Project would not result in a cumulatively considerable contribution to a significant aesthetic impact related to light and glare.

4.1.6 References

Albert A. Webb Associates. 2022. Perris Valley Commerce Center Amendment No. 12 Specific Plan. February 2022. Adopted January 10, 2012, and subsequently amended and approved January 11, 2022.

2011. Final Environmental Impact Report, Perris Valley Commerce Center, SCH No. 2009081086. December. City of Perris.

California Department of Transportation (Caltrans). 2022. California Department of Transportation website: Scenic Highways. Accessed November 2022. Available at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.

City of Perris. 2009. Perris Valley Commerce Center Specific Plan Initial Study. August 2009. 2004. Draft Environmental Impact Report City of Perris General Plan 2030, State Clearinghouse #2004031135. October 2004, certified April 26, 2005.

County of Riverside. 1988. Riverside County Ordinance No. 655 Regulating Light Pollution. Adopted June 7, 1988. Available at: <https://www.rivcocob.org/ords/600/655.htm>.

4.2 AIR QUALITY

This section provides a Project-specific air quality analysis, consistent with the requirements of the PVCCSP EIR. The analysis contained in this section is based on the Project's *Air Quality Impact Analysis* (AQIA; Urban Crossroads 2023a) and the Project's *Mobile Source Health Risk Assessment* (HRA; Urban Crossroads 2023b), which are contained in Appendices B and C, respectively, of this Draft EIR. The land uses evaluated within the AQIA and HRA rely on a previous Project description that would generate more trips, and consequently more emissions compared to the proposed Project. Therefore, the analysis provided presents a conservative analysis of anticipated impacts.

Comments relating to the issue of air quality and health risk were provided by the South Coast Air Quality Management District (SCAQMD) in response to the 2022 NOP. The SCAQMD sent a comment letter with recommendations on the analysis of potential air quality impacts from the Project and provided mitigation measures for operational air quality impacts from mobile sources for consideration by the Lead Agency. Additionally, an organization called CARE CA provided an NOP comment letter that requested the preparation of a HRA for the Project and the inclusion of effective and enforceable mitigation measures. There were no comments addressing air quality raised at the July 20, 2022 Draft EIR public scoping meeting.

4.2.1 Existing Setting

4.2.1.1 South Coast Air Basin

The Project site is located within the South Coast Air Basin (SCAB), a 6,745-square-mile subregion of southern California. The SCAB is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east and includes all of Orange County as well as the non-desert portions of San Bernardino, Los Angeles, and Riverside Counties.

The SCAB is under the jurisdiction of the SCAQMD. The SCAQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under the Act, the SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and state air quality standards.

4.2.1.2 Criteria Pollutants

Criteria pollutants are pollutants that are regulated through the development of human health based and/or environmentally based criteria for setting permissible levels. As described in Section 4.2 of the PVCCSP EIR, air pollutants are classified as either primary or secondary, depending on how they are formed. Primary pollutants are emitted directly from a source into the atmosphere. Examples of primary pollutants include carbon monoxide (CO), nitrogen dioxide (NO₂) and nitric oxide (NO) (which are collectively known as oxides of nitrogen [NO_x]), sulfur dioxide (SO₂), particulates 10 microns or less in diameter (PM₁₀), particulates 2.5 microns or less in diameter (PM_{2.5}), and volatile organic compounds (VOCs). The predominant source of air emissions generated by Project development would be from vehicle emissions. Motor vehicles primarily emit CO, NO_x, and VOCs.

Secondary pollutants are created over time and are formed in the atmosphere as chemical and photochemical reactions take place. An example of a secondary pollutant is ozone (O₃), which is one of the products formed when NO_x reacts with VOCs in the presence of sunlight. Other secondary pollutants

include photochemical aerosols. Secondary pollutants such as O₃ represent major air quality problems in the SCAB.

The Federal Clean Air Act of 1970 established the National Ambient Air Quality Standards (NAAQS). Seven “criteria” air pollutants have now been identified using specific medical evidence, and NAAQS have been established for those pollutants. The State of California has adopted standards (known as California Ambient Air Quality Standards [CAAQS]) for the same seven criteria pollutants, but the State has established different and generally more restrictive allowable levels. The criteria pollutants are CO, NO_x, O₃, lead, PM₁₀, PM_{2.5}, VOC and SO₂. NAAQS and CAAQS currently in effect are shown in Table 4.2-1, *Ambient Air Quality Standards* (California Air Resources Board [CARB] 2016). Further discussion of the criteria pollutants, their sources, and their effects on human health can be found in Section 4.2, Air Quality, of the PVCCSP EIR.

Table 4.2-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards	Federal Standards Primary ¹	Federal Standards Secondary ²
O ₃	1 Hour	0.09 ppm (180 µg/m ³)	–	–
	8 Hour	0.070 ppm (137 µg/m ³)	0.070 ppm (137 µg/m ³)	Same as Primary
PM ₁₀	24 Hour	50 µg/m ³	150 µg/m ³	Same as Primary
	AAM	20 µg/m ³	–	Same as Primary
PM _{2.5}	24 Hour	–	35 µg/m ³	Same as Primary
	AAM	12 µg/m ³	12.0 µg/m ³	15.0 µg/m ³
CO	1 Hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	–
	8 Hour	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)	–	–
NO ₂	1 Hour	0.18 ppm (339 µg/m ³)	0.100 ppm (188 µg/m ³)	–
	AAM	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)	Same as Primary
SO ₂	1 Hour	0.25 ppm (655 µg/m ³)	0.075 ppm (196 µg/m ³)	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m ³)
	24 Hour	0.04 ppm (105 µg/m ³)	–	–
Lead	30-day Avg.	1.5 µg/m ³	–	–
	Calendar Quarter	–	1.5 µg/m ³	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m ³	Same as Primary
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥30 miles for Lake Tahoe)	No Federal Standards	No Federal Standards

Pollutant	Averaging Time	California Standards	Federal Standards Primary ¹	Federal Standards Secondary ²
Sulfates	24 Hour	25 µg/m ³	No Federal Standards	No Federal Standards
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	No Federal Standards	No Federal Standards
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m ³)	No Federal Standards	No Federal Standards

Source: CARB 2016

¹ National Primary Standards: The levels of air quality necessary, within an adequate margin of safety, to protect the public health.

² National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

O₃ = ozone; ppm: parts per million; µg/m³ = micrograms per cubic meter; PM₁₀ = particulate matter with a diameter of 10 microns or less; AAM = Annual Arithmetic Mean; PM_{2.5} = fine particulate matter;

CO = carbon monoxide; mg/m³ = milligrams per cubic meter; NO₂ = nitrogen dioxide; SO₂ = sulfur dioxide; km = kilometer; – = No Standard

- California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM₁₀, PM_{2.5}, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM_{2.5}, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the USEPA for further clarification and current national policies.
- Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
- National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- Reference method as described by the USEPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the USEPA.
- On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- On December 14, 2012, the national annual PM_{2.5} primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
11. On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
12. The ARB 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.
13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively (CARB 2016).

4.2.1.3 Existing Air Quality

Existing ambient air quality is measured throughout the SCAB at established SCAQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. The NAAQS and CAAQS are designed to protect those people most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other diseases or illness, and persons engaged in strenuous work or exercise. The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the state and federal standards.

The most recent state and federal standards were updated by the CARB on May 4, 2016, as presented in Table 4.2-1. The air quality in a region is considered to be in attainment by the state if the measured ambient air pollutant levels for O₃, CO (except 8-hour Lake Tahoe), SO₂ (1 and 24 hour), NO₂, PM₁₀, and PM_{2.5} do not exceed standards. All others are not to be equaled or exceeded. It should be noted that the three-year period is presented for informational purposes and is not the basis for how the state assigns attainment status. Attainment status for a pollutant means that the SCAQMD meets the standards set by the U.S. Environmental Protection Agency (USEPA) or the California EPA (CalEPA). Conversely, nonattainment means that an area has monitored air quality that does not meet the NAAQS or CAAQS standards. To improve air quality in nonattainment areas, CARB has implemented a State Implementation Plan (SIP). The SIP outlines the measures that the state will take to improve air quality. Once nonattainment areas meet the standards and additional redesignation requirements, the USEPA will designate the area as a maintenance area (USEPA 2022a).

4.2.1.4 Regional Air Quality

Air pollution contributes to a wide variety of adverse health effects. The USEPA has established NAAQS for six of the most common air pollutants: CO, lead (Pb), O₃, particulate matter (PM₁₀ and PM_{2.5}), NO₂, and SO₂ which are known as criteria pollutants. The SCAQMD monitors levels of various criteria pollutants at 37 permanent monitoring stations and 5 single-pollutant source Pb air monitoring sites throughout the air district (SCAQMD 2018). See Table 4.2-2, *Attainment Status of Criteria Pollutants in the SCAB*, for attainment designations for the SCAB (CARB 2022).

Table 4.2-2
ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SCAB

Criteria Pollutant	State Designation	Federal Designation
O ₃ – 1-hour standard	Nonattainment	--
O ₃ – 8-hour standard	Nonattainment	Nonattainment
PM ₁₀	Nonattainment	Attainment
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO ₂	Attainment	Unclassifiable/Attainment
SO ₂	Unclassifiable/Attainment	Unclassifiable/Attainment
Pb ¹	Attainment	Unclassifiable/Attainment

Source: Urban Crossroads 2022a

Note: "--" = The national 1-hour O₃ standard was revoked effective June 15, 2005.

¹ The Federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SCAB.

4.2.1.5 Local Air Quality

The SCAQMD has designated general forecast areas and air monitoring areas (referred to as Source Receptor Areas [SRA]) throughout the district to provide Southern California residents about the air quality conditions. The Project site is located within the Perris Valley area (SRA 24). The Perris Valley monitoring station is located approximately 3.8 miles southwest of the Project site and reports air quality statistics for O₃ and PM₁₀. The Riverside-Rubidoux monitoring station, which is located 15.2 miles northwest of the Project site in SRA 23, records air quality data for NO₂, and PM_{2.5}. It should be noted that data from Riverside-Rubidoux monitoring station was utilized in lieu of the Perris Valley monitoring station only in instances where data from the Perris Valley monitoring station was not available.

The most recent three years of data available is shown on Table 4.2-3, *Project Area Air Quality Monitoring Summary 2019-2021* and identifies the number of days ambient air quality standards were exceeded for the Project area, which is considered to be representative of the local air quality at the Project site. Data for O₃, NO₂, PM₁₀, and PM_{2.5} for 2019 through 2021 was obtained from the SCAQMD Air Quality Data Tables (SCAQMD 2023a). Additionally, data for SO₂ has been omitted as attainment is regularly met in the SCAB and few monitoring stations measure SO₂ concentrations.

**Table 4.2-3
PROJECT AREA AIR QUALITY MONITORING SUMMARY 2019-2021**

Pollutant	Standard	Year		
		2019	2020	2021
O ₃				
Maximum Federal 1-Hour Concentration (ppm)		0.118	0.125	0.117
Maximum Federal 8-Hour Concentration (ppm)	>0.070 ppm	0.095	0.106	0.094
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	26	34	25
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	64	74	60
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	1.5	1.9	2.1
Maximum Federal 8-Hour Concentration	> 20 ppm	1.2	1.4	1.8
NO ₂				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.056	0.066	0.052
Annual Federal Standard Design Value		0.014	0.015	0.014
PM ₁₀ ¹				
Maximum Federal 24-Hour Concentration (µg/m ³)	> 150 µg/m ³	97	77	76
Annual Federal Average (µg/m ³)		25.3	35.9	34.2
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	4	6	6
PM _{2.5}				
Maximum Federal 24-Hour Concentration (µg/m ³)	> 35 µg/m ³	46.7	41.0	82.1
Annual Federal Average (µg/m ³)	> 12 µg/m ³	11.3	12.63	12.58
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m ³	4	4	10

Source: Data for O₃, CO, NO₂, PM₁₀, and PM_{2.5} was obtained from SCAQMD Air Quality Data Tables (SCAQMD 2023a).

¹ 2021 PM₁₀ data was obtained from the Metropolitan Riverside County monitoring station as data for Perris Valley was not available.

ppm = parts per million; µg/m³ = microgram per cubic meter

4.2.1.6 Toxic Air Contaminants and Diesel Emissions

Toxic air contaminants (TACs) are chemicals referred to as “non-criteria” air pollutants. They are known or suspected to cause serious health problems, but do not have a corresponding ambient air quality standard. There are hundreds of air toxics, and exposure to these pollutants can cause or contribute to cancer or non-cancer health effects such as birth defects, genetic damage, and other adverse health effects. Effects may be both chronic (i.e., of long duration) or acute (i.e., severe but of short duration) on human health. Acute health effects are attributable to sudden exposure to high concentrations of air toxics. These effects can include nausea, skin irritation, respiratory illness, and, in some cases, death. Chronic health effects usually result from low-dose, long-term exposure to air toxics. The effect of major concern for this type of exposure is cancer, which typically requires a latency period of 10 to 30 years after exposure to develop.

Diesel engines utilize compression to ignite fuel, contrary to standard gasoline engines which use conventional spark plugs. Engines that use compression typically run at higher temperatures than gasoline engines, thereby causing the formation of substantially more NO_x than in gasoline engines. In 1998, the CARB designated diesel particulate matter (DPM), which is present in diesel engine exhaust, as a TAC.

4.2.1.7 Cancer Risk Trends

Based on information available from CARB, overall cancer risk throughout the SCAB has generally declined since 1990. In 1998, following an exhaustive 10-year scientific assessment process, CARB identified particulate matter from diesel-fueled engines as a TAC. The SCAQMD initiated a comprehensive urban toxic air pollution study called the Multiple Air Toxics Exposure Study (MATES). DPM accounts for more than 70 percent of the cancer risk.

In January 2018, as part of the overall effort to reduce air toxics exposure in the SCAB, SCAQMD began conducting the MATES V Program. MATES V field measurements were conducted at ten fixed sites (the same sites selected for MATES III and IV) to assess trends in air toxics levels. MATES V also included measurements of ultrafine particles (UFP) and black carbon (BC) concentrations, which can be compared to the UFP levels measured in MATES IV (SCAQMD 2017a). The final report for the MATES V study was published in August 2021. In addition to new measurements and updated modeling results, several key updates were implemented in MATES V. First, MATES V estimates cancer risks by considering multiple exposure pathways, which includes inhalation and non-inhalation pathways. This approach is consistent with how cancer risks are estimated in SCAQMD's programs such as permitting, Air Toxics Hot Spots (AB 2588), and CEQA. Previous MATES studies quantified the cancer risks based on the inhalation pathway only. Second, along with cancer risk estimates, MATES V includes information on the chronic non-cancer risks from inhalation and non-inhalation pathways for the first time. Cancer risks and chronic non-cancer risks from MATES II through IV measurements have been re-examined using current Office of Environmental Health Hazard Assessment (OEHHA) and CalEPA risk assessment methodologies and modern statistical methods to examine the trends over time (SCAQMD 2021).

MATES-V calculated cancer risks based on monitoring data collected at ten fixed sites within the SCAB. None of the fixed monitoring sites are within the local area of the Project site. However, MATES-V has extrapolated the excess cancer risk levels throughout the SCAB by modeling the specific grids. The Project is located within a quadrant of the geographic grid of the MATES-V model which predicted a cancer risk of 308 in one million for the area containing the Project site. The air toxic cancer risk in the Project area is higher than 15 percent of the SCAQMD population. DPM is included in this cancer risk along with all other TAC sources. As in previous MATES iterations, DPM is the largest contributor to overall air toxics cancer risk. However, the average levels of DPM in MATES V are 53 percent lower at the 10 monitoring sites compared to MATES IV.

4.2.1.8 Sensitive Receptors

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects, including children, the elderly, and individuals with pre-existing respiratory or cardiovascular illness. Structures that house these persons or places where they gather are defined as "sensitive receptors." Commercial, educational, and industrial facilities are not included in the definition of sensitive receptors because employees and patrons do not typically remain onsite for a full 24 hours, but are typically on site for 8 hours or less. However, when conducting a Localized Significance Threshold (LST) analysis (discussed in more detail in Section 4.2.3 below), any adjacent land use where an individual could remain for one to eight hours, that is located at a closer distance to the Project site than the receptor used PM₁₀ and PM_{2.5} analysis, must be considered to determine construction and operational LST air impacts for emissions of NO₂ and CO since these pollutants have an averaging time of one and eight hours.

Existing receptors near the Project site include the following, as shown on **Figure 4.2-1, Sensitive Receptor Locations**:

- R1: Location R1 represents the existing residence at 4310 Almaterra Drive, approximately 3,431 feet northeast of the Project site.
- R2: Location R2 represents the existing residence at 3896 Akina Avenue, approximately 2,279 feet southeast of the Project site.
- R3: Location R3 represents Camper Resorts of America at 375 Ramona Expressway, approximately 172 feet southeast of the Project site.
- R4: Location R4 represents the Park Place Mobile Home Park at 80 East Dawes Street, approximately 306 feet south of the Project site.
- R5: Location R5 represents Katana Motors at 4194 N. Perris Boulevard, approximately 105 feet west of the Project site.
- R6: Location R6 represents First Perry Logistics at 353 Perry Street, approximately 53 feet east of the Project site.
- R7: Location R7 represents the existing residence at Albatross Avenue, approximately 2,588 feet northeast of the Project site.

Future sensitive receptors that would be affected by Project emissions are residential uses that are planned to the east of the Project site, north of Ramona Expressway and between the Perris Valley Storm Drain and Evans Road.

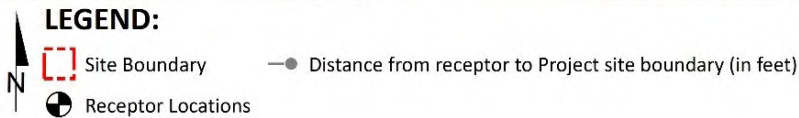
4.2.2 Existing Policies and Regulations

4.2.2.1 Federal

The USEPA is responsible for setting and enforcing the NAAQS for O₃, CO, NO_x, SO₂, PM₁₀, and Pb. The USEPA has jurisdiction over emissions sources that are under the authority of the federal government including aircraft, locomotives, and emissions sources outside state waters (Outer Continental Shelf). The USEPA also establishes emission standards for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission requirements of CARB.

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The CAA establishes the federal air quality standards, the NAAQS, and specifies future dates for achieving compliance (USEPA 2022b). The CAA also mandates that states submit and implement SIPs for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards would be met.

The 1990 amendments to the CAA that identify specific emission reduction goals for areas not meeting the NAAQS require a demonstration of reasonable further progress toward attainment and incorporate additional sanctions for failure to attain or to meet interim milestones.



Source: Urban Crossroads, 2022

The sections of the CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants O_3 , NO_2 , SO_2 , PM_{10} , CO, $PM_{2.5}$, and Pb. The NAAQS were amended in July 1997 to include an additional standard for O_3 and to adopt a NAAQS for $PM_{2.5}$. Table 4.2-1 (previously presented) provides the NAAQS within the SCAB.

Mobile source emissions are regulated in accordance with Title II provisions. These provisions require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas. Automobile manufacturers are also required to reduce tailpipe emissions of hydrocarbons and NO_x . NO_x is a collective term that includes all forms of NO_x which are emitted as byproducts of the combustion process.

4.2.2.2 State

California Air Resources Board

CARB, which became part of the CalEPA in 1991, is responsible for ensuring implementation of the California Clean Air Act (AB 2595), responding to the federal CAA, and for regulating emissions from consumer products and motor vehicles. AB 2595 mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources to attain the state ambient air quality standards by the earliest practical date. CARB established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, establishes standards for SO_4 , visibility, hydrogen sulfide (H_2S), and vinyl chloride (C_2H_3Cl). However, currently, H_2S and C_2H_3Cl are not measured at any monitoring stations in the SCAB because they are not considered to be a regional air quality problem. The CAAQS are more stringent than the NAAQS (CARB 2009; USEPA 1990).

Local air quality management districts, such as the SCAQMD, regulate air emissions from stationary sources such as commercial and industrial facilities. All air pollution control districts have been formally designated as attainment or non-attainment for each CAAQS.

Serious non-attainment areas are required to prepare Air Quality Management Plans (AQMPs) that include specified emission reduction strategies to meet clean air goals. These plans are required to include:

- Application of Best Available Retrofit Control Technology to existing sources;
- Developing control programs for area sources (e.g., architectural coatings and solvents) and indirect sources (e.g., motor vehicle use generated by residential and commercial development);
- A District permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions;
- Implementing reasonably available transportation control measures and assuring a substantial reduction in growth rate of vehicle trips and miles traveled;
- Significant use of low emissions vehicles by fleet operators; and

- Sufficient control strategies to achieve a 5 percent or more annual reduction in emissions or 15 percent or more in a period of three years for VOCs, NO_x, CO and PM₁₀. However, air basins may use alternative emission reduction strategy that achieves a reduction of less than 5 percent per year under certain circumstances.

Title 24 Energy Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: 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 August 1, 2009, and is administered by the California Building Standards Commission.

CALGreen is updated on a regular basis, with the most recently approved update consisting of the 2022 California Green Building Code Standards that will be effective on January 1, 2023. The CEC anticipates that the 2022 energy code will provide \$1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons (California Energy Commission 2021). The Project would be required to comply with the applicable standards in place at the time building permit document submittals are made. The measures applicable to air quality are as follows (California Department of General Services 2022):

Nonresidential Mandatory Measures

- 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 percent of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- 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 as shown in Table 5.106.5.2 (5.106.5.2).
- 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 for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.

4.2.2.3 Regional

SCAQMD Air Quality Management Plan

Currently, the NAAQS and CAAQS are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of AQMPs to meet the state and federal ambient air quality standards (Southern California Association of Governments (SCAG) 2016). AQMPs are updated regularly to ensure an effective reduction in emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. The current 2022 AQMP was adopted by the SCAQMD Governing Board in December 2022. The 2022 AQMP 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.

SCAQMD Rules

The SCAQMD has established various rules/regulatory requirements applicable to development projects. Following is a discussion of SCAQMD rules particularly relevant to the Project, which address construction-related and operational activities.

SCAQMD Rule 201

A person shall not build, erect, install, alter, or replace any equipment permit unit, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants without first obtaining written authorization for such construction from the Executive Officer. A permit to construct shall remain in effect until the permit to operate the equipment for which the application was filed as granted or denied, or the application is canceled.

SCAQMD Rule 401

A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the U.S. Bureau of Mines.

SCAQMD Rule 402

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

SCAQMD Rule 403

This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent and reduce fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust and requires best available control measures to be applied to earth moving and grading activities.

SCAQMD Rule 1113

This rule serves to limit the VOC content of architectural coatings used on projects in the SCAQMD. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use on projects in the SCAQMD must comply with the current VOC standards set in this rule.

SCAQMD Rule 1301

This rule is intended to provide that pre-construction review requirements to ensure that new or relocated facilities do not interfere with progress in attainment of the NAAQS, while future economic growth within the SCAQMD is not unnecessarily restricted. The specific air quality goal is to achieve no net increases from new or modified permitted sources of nonattainment air contaminants or their precursors. Rule 1301 also limits emission increases of ammonia, and Ozone Depleting Compounds (ODCs) from new, modified or relocated facilities by requiring the use of Best Available Control Technology (BACT).

SCAQMD Rule 1401

This rule requires the inspection of new gas transfer and dispensing facilities by SCAQMD staff to evaluate cancer risk, which must be no more than 10 in one million over a 70-year lifespan.

SCAQMD Rule 2305

The SCAQMD adopted Rule 2305, the Warehouse Indirect Source Rule, on May 7, 2021. Owners and operators associated with warehouses 100,000 square feet or larger are required to directly reduce NO_x and particulate matter emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities.

4.2.2.4 Local

City of Perris General Plan

The Conservation Element, Environmental Justice Element, and Healthy Community Element of the City of Perris General Plan include policies related to air quality. The specific policies of the General Plan related to air quality that are relevant to the proposed Project are identified in Table 4.10-2, in Section 4.10, *Land Use and Planning*, of this EIR, along with an analysis of the Project's consistency with these policies.

4.2.2.5 Applicable PVCCSP Standards and Guidelines and Mitigation Measures

There are no PVCCSP Standards and Guidelines applicable to the analysis of air quality for the Project; however, the PVCCSP EIR contains the air quality mitigation measures listed below for the PVCCSP and implementing projects.

- 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 URBan EMISSIONS (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 LST 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.

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 a 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.

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 (mph) or less on all unpaved portions of the project sites;
- suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 mph;
- appointment of a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM₁₀ 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
- replacement of ground cover in disturbed areas as quickly as possible.

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.

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 of Perris' Building Division prior to issuance of grading permits.

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 PuriNO_x 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.

MM Air 7 During construction, ozone (O₃) 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.

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.

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.

- 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 LST 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.
- MM Air 11** Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling more than five minutes.
- MM Air 12** Where transport refrigeration units (TRUs) are in use, electrical hookups will be installed at all loading and unloading stalls to allow TRUs with electric standby capabilities to use them.
- 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, On-road Heavy Duty Voucher Incentive Program (VIP), Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP), and Surplus Off-Road Opt-in for NO_x (SOON) funding programs, as identified on SCAQMD's website (<http://www.aqmd.gov>). Tenants would be required to use those funds, if awarded.
- 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.
- 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 (HRA) performed to assess the diesel particulate matter (DPM) impacts from mobile-source traffic generated by that implementing development project. The proposed Project is expected to result in 242 truck trips per

day and is therefore required to prepare an HRA. The results of the HRA shall be included in the CEQA documentation for each implementing development project.

- 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 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 for the establishment of a bus route that will serve the implementing development project, road improvements adjacent to the Project sites 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 Americans with Disabilities Act (ADA)-compliant paths to the major building entrances in the project.
- 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 sites. 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.
- 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 would be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.
- MM Air 21** Each implementing development project shall implement, at a minimum, use of water conserving appliances and fixtures (low-flush toilets, and low-flow shower heads and faucets) within all new residential developments.

The Project would comply with the applicable measures listed above (PVCCSP EIR mitigation measure MM. Air 21 is only applicable to new residential developments and is not applicable to the proposed Project). PVCCSP EIR mitigation measures MM Air 1, MM Air 10, and MM Air 15 have been complied with as part of the AQIA and HRA prepared for the Project and the results have been incorporated into the analysis contained in this EIR section.

4.2.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, a significant air quality impact would occur if implementation of the proposed Project would result in any of the following:

- 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 criteria pollutant for which the project region is nonattainment under an applicable federal or 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) adversely affecting a substantial number of people?

The SCAQMD has developed regional significance thresholds for criteria pollutants, as summarized in Table 4.2-4, *Maximum Daily Regional Emissions Thresholds*. The SCAQMD's *CEQA Air Quality Significance Thresholds* (SCAQMD 2023b) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

Table 4.2-4
MAXIMUM DAILY REGIONAL EMISSIONS THRESHOLDS

Pollutant	Regional Construction Threshold	Regional Operational Thresholds
NO _x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
SO _x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Pb	3 lbs/day	3 lbs/day

Source: SCAQMD 2023b

Note: lbs/day = pounds per day

The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the NAAQS and/or CAAQS. Collectively, these are referred to as LSTs. The SCAQMD produced screening look-up tables for projects less than or equal to 5 acres in size. The SCAQMD's screening look-up tables are utilized in determining the significance of the Project's localized air quality impacts, and to determine if further detailed analysis is required. This approach is conservative as it assumes that all on-site emissions associated with the Project (construction and operation) would occur within a concentrated 5-acre area. Therefore, LSTs for a 5-acre site within SRA 24 during construction and operation are used as a screening tool to determine if further detailed analysis is required. The thresholds used for the construction-source LST analysis are presented in Table 4.2-5, *SCAQMD Maximum Daily Localized Construction Emissions Thresholds*, and the thresholds used for the operational-source LST analysis are presented in Table 4.2-6, *SCAQMD Maximum Daily Operational Localized Emissions Thresholds*.

Table 4.2-5
SCAQMD MAXIMUM DAILY LOCALIZED CONSTRUCTION EMISSIONS THRESHOLDS

Construction Activity	Construction Localized Thresholds			
	NO _x	CO	PM ₁₀	PM _{2.5}
Site Preparation	270 lbs/day	1,577 lbs/day	40 lbs/day	10 lbs/day
Grading				
Building Construction				
Paving				
Architectural Coating				

Source: SCAQMD 2008

lbs/day = pounds per day

Table 4.2-6
SCAQMD MAXIMUM DAILY OPERATIONAL LOCALIZED EMISSIONS THRESHOLDS

Operational Localized Thresholds			
NO _x	CO	PM ₁₀	PM _{2.5}
270 lbs/day	1,577 lbs/day	4 lbs/day	2 lbs/day

Source: SCAQMD 2008

lbs/day = pounds per day

The SCAQMD *CEQA Air Quality Handbook* (SCAQMD 1993) states that emissions of TACs are considered significant if a HRA shows an increased risk of greater than 10 in one million. Based on guidance from the SCAQMD in the document *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis* (SCAQMD 2003a), for purposes of this analysis, 10 in one million is used as the cancer risk threshold for the proposed Project.

The SCAQMD has also established non-carcinogenic risk parameters for use in HRAs. Non-carcinogenic risks are quantified by calculating a “hazard index,” expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). An REL is a concentration at or below which health effects are not likely to occur. A hazard index of less than one (1.0) means that adverse health effects are not expected. In this HRA, non-carcinogenic exposures of less than 1.0 are considered less than significant. Both the cancer risk and non-carcinogenic risk thresholds are applied to the nearest sensitive receptors.

The SCAQMD has published a report on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (SCAQMD 2003b). In this report the SCAQMD clearly states (Page D-3):

“...the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is $HI > 1.0$ while the cumulative (facility-wide) is $HI > 3.0$. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.”

Therefore, this 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. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable.

4.2.4 Environmental Impacts

Threshold a: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact Analysis

In December 2022, the SCAQMD released the *Final 2022 AQMP (2022 AQMP)*. The *2016 AQMP* continues to evaluate current integrated strategies and control measures to meet the NAAQS and CAAQS, 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 (SCAQMD 2017b). Similar to the 2016 AQMP, the *2022 AQMP* incorporates scientific and technological information and planning assumptions, including the *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS)* and updated emission inventory methodologies for various source categories (SCAG 2020). (Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2, and Section 12.3 of the *1993 CEQA Handbook* (SCAQMD 2003a). These criteria and an associated discussion of the Project's compliance with the criteria 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. As discussed previously, the LSTs have been developed to determine whether there is a potential for a project to cause localized exceedances of the NAAQS and/or CAAQS. As such, projects, uses, and activities that do not exceed any applicable LSTs would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds. CAAQS and NAAQS violations would occur if localized significance thresholds were exceeded.

Construction Impacts – Consistency Criterion 1

Consistency Criterion No. 1 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if localized significance thresholds were exceeded. As evaluated in thresholds (b) and (c) below, the Project's localized construction-source emissions would not exceed applicable LSTs. Therefore, project operational-source emissions would not conflict with Consistency Criterion 1.

Consistency Criterion No. 2

The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.

The *2022 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 SCAQMD 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 the 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 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 would be exceeded (refer to the discussion for threshold (b) below), no inconsistency with this criterion would occur as a result of construction activities.

Operational Impacts – Consistency Criterion 2

The Project site is designated for Commercial uses in the PVCCSP. 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 zone combines the General Plan Land Use designation of Community Commercial and Commercial Neighborhood (City of Perris 2022). The Project proposes a change (rezone) of the PVCCSP land use designation for 36.01 acre of Commercial to Light Industrial to facilitate development of the proposed warehouse uses. The Project would consist of 774,419 square feet of High-Cube Fulfillment Center Warehouse use and up to 70,000 square feet of Retail and Restaurant uses. The Project Applicant proposes a Specific Plan Amendment, to allow for light industrial uses on the Project site. Although the site is designated entirely for commercial, the commercial aspects of the site fulfill this use, and the partial change to light industrial would not cause a significant change in employment and population as was already assumed within SCAGs projections and used as a basis for the AQMP.

Table 4.8-E, *Development Intensity and Employment Projections*, of the PVCCSP EIR, identifies average employment generation factors for the allowed development types identified in the PVCCSP. One employee per 1,030 square feet is estimated for Light Industrial floor space and one employee per 500 square feet is estimated for commercial uses. While the Project would change the use for part of the Project site from Commercial to Light Industrial uses, based on the employment factors contained in the PVCCSP, the Project would result in an estimated 892 jobs for the Project site, which would be reduced as compared to the potential employment generated for the entire site under the Commercial designation. Thus, while the Project would result in a change in the land use designation for the Project site, the proposed change would not result in an increase in intensity (i.e., new residents or new jobs) that were not considered in the AQMP, because the proposed portion of the project that would include the warehouse use would generate reduced employment as compared to the commercial uses assumed in the AQMP.

In summary, based on the discussion above, the Project is determined to be consistent with Consistency Criterion No. 1 and consistent with Consistency Criterion No. 2 for both construction and operation. As such, the Project would be consistent with the AQMP and a less than significant impact would occur.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold b: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Impact Analysis

Construction Emissions

Construction activities associated with the Project would result in emissions of VOC, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}. Construction related emissions are expected from the following construction activities: site preparation, grading, off-site utility, and infrastructure improvements, building construction, paving, architectural coating, and on-road trips (associated with workers, vendors, and for soil import). The Project would result in approximately 240 total working-days of construction activity.

The estimated maximum daily construction emissions are summarized in Table 4.2-7, *Overall Construction Emissions Summary*. Detailed construction model outputs are presented in Appendix 3.1 of the Project AQIA (Appendix B to this EIR). Under the assumed scenarios (refer to Project AQIA for specific construction scenario assumptions), emissions resulting from the Project construction would not exceed criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant. As such, regional air quality impacts associated with construction would be less than significant.

**Table 4.2-7
OVERALL CONSTRUCTION EMISSIONS SUMMARY**

Year	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer (Smog Season)						
2023	3.35	19.10	47.50	0.05	6.29	1.97
2024	31.00	27.60	63.60	0.07	7.78	2.57
Winter						
2023	4.99	62.80	39.90	0.18	9.88	5.08
2024	30.80	28.20	54.70	0.07	7.78	2.57
Maximum Daily Emissions	31.00	62.80	63.60	0.18	9.88	5.08
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: Urban Crossroads 2022a; CalEEMod construction-source (unmitigated) emissions are presented in Appendix 3.1 of the Project AQIA (Appendix B to this EIR).

Operational Emissions

Operational activities associated with the Project will result in emissions of VOC, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}. Operational emissions are expected from the following primary sources:

- Area Source Emissions – including architectural coatings, consumer products, and landscape maintenance equipment;
- Energy Source Emissions – including combustion emissions associated with natural gas and electricity. Natural gas equipment only generates 142.1 MT of CO₂e. As the project tenants are unknown, natural gas equipment could be used in their course of business. Analyzing natural gas presents a conservative analysis for CEQA purposes;

- Mobile Source Emissions – derived primarily from vehicle trips generated by the Project, including employee trips to and from the site, truck trips associated with the proposed uses, and retail customers. Fugitive dust emanations due the generation of road dust are also included in mobile source emissions; and
- On-Site Cargo Handling Equipment Emissions – including exterior cargo handling equipment in the building's truck court areas.

Operational-source emissions associated with the Project are summarized in Table 4.2-8, *Summary of Peak Operational Emissions*. As indicated in the table, the Project would exceed regional thresholds of significance established by the SCAQMD for emissions of VOC, NO_x, and CO. Over 90 percent of operational-source VOC emissions would be generated from the use of consumer products and mobile activities, and mobile source emissions alone would exceed the regional significance threshold for VOC. Similarly, over 98 percent of operational-source NO_x emissions and 88 percent of CO operational source emissions would be generated from mobile activities.

**Table 4.2-8
SUMMARY OF PEAK OPERATIONAL EMISSIONS**

Source	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer (Smog Season)						
Mobile Source	60.50	110.00	655.00	1.92	58.50	12.10
Area Source	26.30	0.31	36.70	< 0.005	0.05	0.07
Energy Source	0.07	1.25	1.05	0.01	0.09	0.09
On-Site Equipment	0.35	1.13	49.33	0.00	0.09	0.08
Total Maximum Daily Emissions	87.22	112.69	742.08	1.93	58.73	12.34
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	Yes	Yes	Yes	No	No	No
Winter						
Mobile Source	56.50	117.00	541.00	1.82	58.50	12.10
Area Source	20.30	0.00	0.00	0.00	0.00	0.00
Energy Source	0.07	1.25	1.05	0.01	0.09	0.09
On-Site Equipment	0.35	1.13	49.33	0.00	0.09	0.08
Total Maximum Daily Emissions	77.22	119.38	591.38	1.83	58.68	12.27
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	Yes	Yes	Yes	No	No	No

Source: Urban Crossroads 2022a

Mitigation Measures

As previously stated, the Project is required to comply with the applicable PVCCSP EIR mitigation measures described in Section 4.2.2.5. In particular, PVCCSP EIR mitigation measures MM Air 8 and MM Air 9 would reduce VOC emissions resulting from the application of architectural coatings. In addition to the PVCCSP mitigation measures specified in Section 4.2.2.5, the Project shall implement the following Project-specific mitigation measures:

Project-Specific MM AQ-1: Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas of the warehouse portion of the Project that identify applicable

CARB anti-idling regulations. At a minimum, each sign shall include: (1) instructions for truck drivers to shut off engines when not in use; (2) instructions for drivers of diesel trucks to restrict idling to no more than five minutes once the vehicle is stopped, the transmission is set to “neutral” or “park,” and the parking brake is engaged; and (3) telephone numbers of the building facilities manager and CARB to report violations. Prior to the issuance of an occupancy permit, the City Public Works Department shall conduct a site inspection to ensure that the signs are in place.

Project-Specific MM AQ-2: Prior to the issuing of each building permit, the project proponent shall provide plans and specifications to the City of Perris Building Department that demonstrate that each Project building is designed for passive heating and cooling and is designed to include natural light. Features designed to achieve this shall include the proper placement of windows, overhangs, and skylights.

Project-Specific MM AQ-3: Prior to the issuing of each building permit, the Project proponent shall provide plans and specifications to the City of Perris Building Department that demonstrate that electrical service is provided to each of the areas in the vicinity of the building that are to be landscaped in order that electrical equipment may be used for landscape maintenance.

Project-Specific MM AQ-4: Once constructed, the Project proponent shall ensure that all building tenants shall utilize electric equipment for landscape maintenance to the extent feasible through requirements in the lease agreements. This aspect of the lease agreements shall be reviewed and verified by the City of Perris Planning Division.

Project-Specific MM AQ-5: Once constructed, the Project proponent shall ensure that all building tenants in the warehouse portion of the Project shall utilize only electric or natural gas service yard trucks (hostlers), pallet jacks and forklifts, and other onsite equipment, through requirements in the lease agreements. Electric-powered service yard trucks (hostlers), pallet jacks and forklifts, and other onsite equipment shall also be required instead of diesel-powered equipment, if technically feasible. Yard trucks may be diesel fueled in lieu of electrically or natural gas fueled provided such yard trucks are at least compliant with CARB 2010 standards for on-road vehicles or CARB Tier 4 compliant for off-road vehicles.

Project-Specific MM AQ-6: Upon occupancy, the facility operator for the warehouse portion of the Project shall require tenants that do not already operate 2010 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, SmartWay Finance, or other similar funds. If awarded, the tenant shall be required to accept and use the funding. Tenants shall be encouraged to consider the use of alternative fueled trucks as well as new or retrofitted diesel trucks. Tenants shall also be encouraged to become SmartWay Partners, if eligible. This measure shall not apply to trucks that are not owned or operated by the facility operator or facility tenants since it would be infeasible to prohibit access to the site by any truck that is otherwise legal to operate on California roads and highways. The facility operator shall provide an annual report to the City of Perris Planning Division. The report shall: (1) list each engine design; (2) describe the effort made by each tenant to obtain funding to upgrade their fleet and the results of that effort; and (3) describe the change in each fleet composition from the prior year.

Project-Specific MM AQ-7: Tenants who employ 250 or more employees on a full- or part-time basis shall comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. The purpose of this rule is to provide employees with a menu of options to reduce employee commute vehicle emissions.

Tenants with less than 250 employees or tenants with 250 or more employees who are exempt from SCAQMD Rule 2202 (as stated in the Rule) shall either (a) join with a tenant who is implementing a program in accordance with Rule 2202 or (b) implement an emission reduction program similar to Rule 2202 with annual reporting of actions and results to the City of Perris. The tenant-implemented program shall include, but not be limited to the following:

- Appoint a Transportation Demand Management (TDM) coordinator who will promote the TDM program, activities, and features to all employees;
- Create and maintain a “commuter club” to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work;
- Inform employees of public transit and commuting services available to them (e.g., social media, signage);
- Provide on-site transit pass sales and discounted transit passes;
- Guarantee a ride home;
- Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted; and
- Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.”

Project-Specific MM AQ-8: Prior to the issuance of a building permit, the Project proponent shall provide evidence to the City that loading docks are designed to be compatible with SmartWay trucks.

Project-Specific MM AQ-9: Upon occupancy and annually thereafter, the facility operator shall provide information to all tenants, with instructions that the information shall be provided to employees and truck drivers as appropriate, regarding:

- Building energy efficiency, solid waste reduction, recycling, and water conservation;
- Vehicle GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting;
- Participation in the Voluntary Interindustry Commerce Solutions (VICS) “Empty Miles” program to improve goods trucking efficiencies;
- Health effects of diesel particulates, State regulations limiting truck idling time, and the benefits of minimized idling; and
- The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity.

Project-Specific MM AQ-10: Prior to issuance of a building permit, the Project proponent shall provide the City with an onsite signage program that clearly identifies the required onsite circulation system. This shall be accomplished through posted signs and painting on driveways and internal roadways.

Project-Specific MM AQ-11: Prior to issuance of an occupancy permit, the City shall confirm that signs clearly identifying approved truck routes have been installed along the truck routes to and from the Project site.

Project-Specific MM AQ-12: Prior to issuance of an occupancy permit, the Project proponent shall install a sign on the property with telephone, email, and regular mail contact information for a designated representative of the tenant who would receive complaints about excessive noise, dust, fumes, or odors. The sign shall also identify contact data for the City for perceived Code violations. The tenant's representative shall keep records of any complaints received and actions taken to communicate with the complainant and resolve the complaint. The tenant's representative shall endeavor to resolve complaints within 24 hours.

Project-Specific MM AQ-13: Prior to issuance of a building permit, the Project proponent shall provide the City with Project specifications, drawings, and calculations that demonstrate that main electrical supply lines and panels have been sized to support heavy truck charging facilities when these trucks become available. The calculations shall be based on reasonable predictions from currently available truck manufacturer's data. Electrical system upgrades that exceed reasonable costs shall not be required.

Additionally, the comment letter provided by the SCAQMD during the 2022 NOP scoping period requested that the lead agency consider mitigation measures including Requiring zero-emission (ZE) or near-zero (NZE) on road trucks, limiting or putting a daily truck cap on the Project, and providing EV charging stations and electrical hookups, require solar, light-colored roofs, etc. The SCAQMD also provided these recommendations to reduce health risk assessment impacts from diesel exhaust. Based on the 2021 Feasibility Assessment for Drayage Trucks on the San Pedro Bay Ports Clean Air Action Plan, requiring heavy-duty trucks to comply with such standards is currently infeasible due to the lack of availability of the recommended technology (Tetra Tech 2021). Similarly, it is not feasible for the City to impose and monitor a truck cap or limitation of the trucks that would go to and from the Project. Additionally, solar panels cannot be used at the Project site due to limitations on solar imposed by the MARB/IPA ALUCP. Therefore, no additional mitigation proposed by the SCAQMD are feasible or applicable to the proposed Project.

Level of Significance After Mitigation

The Project-specific mitigation measures (MM AQ-1 through MM AQ-13) are designed to reduce Project operational-source VOC and NO_x emissions. However, it should be noted that there is no way to quantify these reductions. Furthermore, as the City of Perris or the Project Applicant do not have regulatory authority to control tailpipe emissions, no feasible mitigation beyond the measures identified exist that would reduce VOC and NO_x emissions to levels that are less than significant; thus, Project operational emissions would result in significant and unavoidable air quality impacts.

Threshold c: Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact Analysis

Localized Significance Thresholds

LSTs represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable NAAQS and CAAQS at the nearest residence or sensitive

receptor. Receptor locations are off-site locations where individuals may be exposed to emissions from Project activities. Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, and individuals with pre-existing respiratory or cardiovascular illness. Structures that house these persons or places where they gather are defined as “sensitive receptors.” These structures typically include uses such as residences, hotels, and hospitals where an individual can remain for 24 hours. Consistent with the LST Methodology, the nearest land use to the Project site where an individual could remain for 24 hours has been used to determine construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$, since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time. LSTs apply, even for non-sensitive land uses, consistent with *LST Methodology* and SCAQMD guidance.

Per the *LST Methodology*, commercial, educational, and industrial facilities are not included in the definition of sensitive receptor because employees and patrons do not typically remain onsite for a full 24 hours but are typically onsite for 8 hours or less. However, *LST Methodology* explicitly states that “LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours” (SCAQMD 2008). Therefore, any adjacent land use where an individual could remain for one to eight hours, that is located at a closer distance to the Project site than the receptor used for PM_{10} and $PM_{2.5}$ analysis, must be considered to determine construction and operational LST air impacts for emissions of NO_2 and CO since these pollutants have an averaging time of one and eight hours. The SCAQMD recommends that the nearest sensitive receptor be considered when determining the Project’s potential to cause an individual or a cumulatively significant impact. The nearest land use where an individual could remain for 24 hours to the Project site has been used to determine localized construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$ (since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time). The nearest receptor used for evaluation of localized impacts of PM_{10} and $PM_{2.5}$ is represented by location R3 which represents Camper Resorts of America at 375 Ramona Expressway, approximately 172 feet/50 meters southeast of the Project site. As such, for evaluation of localized PM_{10} and $PM_{2.5}$, a 50-meter distance has been used.

As previously stated, and consistent with *LST Methodology*, the nearest commercial, educational, or industrial use to the Project site is used to determine construction and operational LST air impacts for emissions of NO_x and CO as the averaging periods for these pollutants are shorter (eight hours or less) and it is reasonable to assumed that an individual could be present at these sites for periods of one to eight hours. The nearest receptor used for evaluation of localized impacts of NO_x and CO is represented by location R6 which represents First Perry Logistics at 353 Perry Street, approximately 53 feet/16 meters east of the Project site.

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 $PM_{2.5}$. Table 4.2-9, *Localized Construction-Source Emissions*, identifies the localized impacts at the nearest receptor location (R3) in the vicinity of the Project. As shown in Table 4.2-9, localized construction emissions would not exceed the applicable SCAQMD LSTs for emissions of any criteria pollutant.

**Table 4.2-9
LOCALIZED CONSTRUCTION-SOURCE EMISSIONS**

On-Site Emissions	Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
2023	47.00	38.00	8.19	5.02
2024	21.22	25.73	0.97	0.89
Maximum Daily Emissions	47.00	38.00	8.19	5.02
SCAQMD Localized Threshold	270	1,577	40	10
Threshold Exceeded?	No	No	No	No

Source: Urban Crossroads 2022a

As shown on Table 4.2-10, *Localized Significance Summary of Operations*, Project 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 activity.

**Table 4.2-10
LOCALIZED SIGNIFICANCE SUMMARY OF OPERATIONS**

On-Site Emissions	Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	20.78	183.88	2.12	0.66
SCAQMD Localized Threshold	270	1,577	4	2
Threshold Exceeded?	No	No	No	No

Source: Urban Crossroads 2022a

CO Hot Spots

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. 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, as shown on Table 3-13 of the Project AQIA included in Appendix B of this EIR.

Based on the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (*1992 CO Plan*), peak CO 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, 9.3 parts per million (ppm) 8-hour 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 8.6 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared (SCAQMD 2003c). In contrast, 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.

The ambient 1-hour and 8-hour CO concentration within the Project study area is estimated to be 1.9 ppm and 1.4 ppm, respectively (data from Perris Valley station for 2020). Therefore, even if the traffic volumes for the proposed Project were double or even triple of the traffic volumes generated at the Long Beach Boulevard and Imperial Highway 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—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—to generate a significant CO impact.

Traffic volumes generating the CO concentrations for the “hot spot” analysis is shown on Table 3-14 of the AQIA included in Appendix B of this EIR. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per hour and AM/PM traffic volumes of 8,062 vehicles per hour and 7,719 vehicles per hour, 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 ($4.6 \text{ ppm} \times 4 = 18.4 \text{ ppm}$) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm). As summarized in Table 3-15 of the Project AQIA included in Appendix B of this EIR, the intersection of Perris Boulevard and Ramona Expressway would have the highest AM and PM traffic volumes of 5,772 vehicles per hour and 6,294 vehicles per hour, respectively. As such, total traffic volumes at the intersections considered are less than the traffic volumes identified in the 2003 AQMP. As such, the Project considered herein along with background and cumulative development would not produce the volume of traffic required to generate a CO “hot spot” either in the context of the 2003 Los Angeles hot spot study or based on representative BAAQMD CO threshold considerations. Therefore, CO “hot spots” are not an environmental impact of concern for the Project. Localized air quality impacts related to CO hot spots would be less than significant.

Health Risk Assessment

The HRA prepared for the Project is included in Appendix C of this EIR. The land uses evaluated within the HRA rely on a previous Project description that would generate more trips, and consequently more emissions compared to the proposed Project. Therefore, the analysis provided presents a conservative analysis of anticipated impacts.

The HRA evaluates the potential mobile-source emissions health risk impacts associated with the development of the proposed Project. More specifically, potential health risk impacts that could result from exposure to TACs, in this case, DPM generated by heavy-duty diesel trucks accessing the site. The results of the HRA are summarized below. Refer to the HRA for detailed assumptions and emissions calculations.

Construction Impacts

The emissions calculations for the construction HRA component are based on an assumed mix of construction equipment and hauling activity as presented in the Project AQIA (Appendix B of this EIR). Construction related DPM emissions are expected to occur primarily as a function of heavy-duty construction equipment that would be operating on-site. The Project would result in approximately 240 total working-days of construction activity.

The land use with the greatest potential exposure to Project construction-source DPM emissions is Receptor R4 which is located approximately 306 feet south the Project site, at an existing residence located at 80 East Dawes Street. Since there are no private outdoor living areas (backyards) facing the Project site, R4 is placed at the building façade. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 1.31 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 threshold of 1.0. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. All other receptors during construction activity would experience less risk than what is identified for this location.

Operational Impacts

The Project HRA evaluates the potential significance of the Project's mobile-source DPM emissions and emissions from operational of-site and off-site truck activity. Detailed information regarding modeling assumptions, model outputs, and risk calculations are presented in the Project HRA and its appendices (the Project HRA is Appendix C to this EIR). Vehicle DPM emissions were calculated using emission factors for PM₁₀ generated with the 2021 version of the Emission FACtor model (EMFAC) developed by the CARB. For this Project, annual average PM₁₀ emission factors were generated by running EMFAC 2021 in EMFAC Mode for vehicles in the Riverside County jurisdiction. The model was run for speeds traveled in the vicinity of the Project, including idling (on-site loading/unloading and truck gate), 5 miles per hour (on-site vehicle movement including driving and maneuvering), and 25 miles per hour (off-site vehicle movement including driving and maneuvering).

As a conservative measure, an EMFAC 2021 run was conducted and a static emissions factor data set was used for the entire duration of analysis herein (e.g., 30 years). Use of emission factors would overstate potential impacts since this approach assumes that emission factors remain "static" and do not change over time due to fleet turnover or cleaner technology with lower emissions that would be incorporated into vehicles after 2024.

Each roadway was modeled as a line source (made up of multiple adjacent volume sources). Due to the large number of volume sources modeled for this analysis, the corresponding coordinates of each volume source have not been included in this report but are included in Appendix 2.3 of the Project HRA. The DPM emission rate for each volume source was calculated by multiplying the emission factor (based on the average travel speed along the roadway) by the number of trips and the distance traveled along each roadway segment and dividing the result by the number of volume sources along that roadway, as illustrated on Table 4.2-11, *DPM Emissions from Project Trucks (2024 Analysis Year)*.

Table 4.2-11
DPM EMISSIONS FROM PROJECT TRUCKS (2024 ANALYSIS YEAR)

Source	Trucks per day	VMT ^a (mi/day)	Truck Emission Rate ^b (g/mi)	Truck Emission Rate ^b (g/idle-hr)	Daily Truck Emissions ^c (g/day)	Modeled Emission Rates (g/s)
On-Site Idling-North	74	--	--	0.0607	1.12	1.292E-05
On-Site Idling-South	74	--	--	0.0607	1.12	1.292E-05
On-Site Travel	294	195.54	0.0191	--	3.74	4.327E-05
Off-Site Travel-Perry St 50% Inbound/Outbound	147	36.36	0.0085	--	0.31	3.597E-06
Off-Site Travel-Perry St 100% Inbound/ Outbound	294	51.35	0.0085	--	0.44	5.080E-06
Off-Site Travel- Harley Knox Blvd 100% Inbound/ Outbound	294	649.31	0.0085	--	5.55	6.423E-05

Source: Urban Crossroads 2022b

a. vehicles miles traveled are for modeled trucks only.

b. Emission Rates determined using EMFAC 2021. Idle emission rates are expressed in grams per idle hour rather than grams per mile.

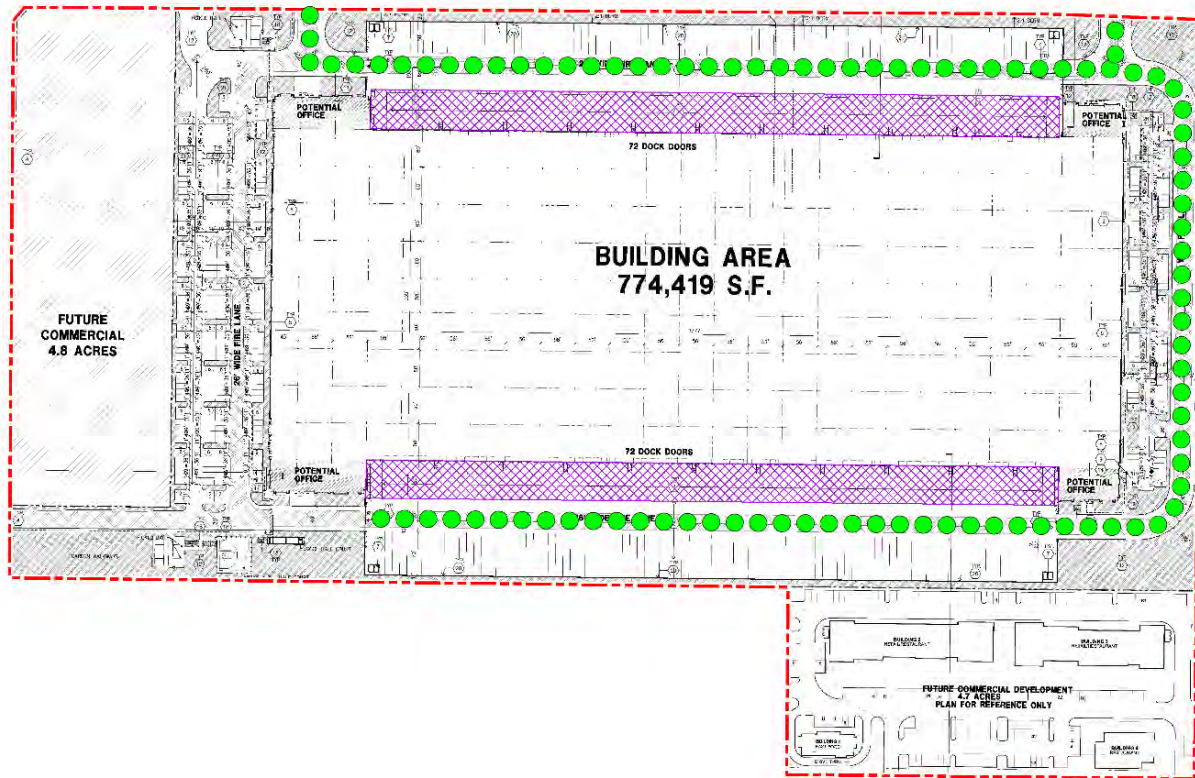
c. This column includes the total truck travel and truck idle emissions. For idle emissions, this column includes emissions based on the assumption that each truck idles for 15 minutes.

Mi=miles; g=grams; hr=hour; s=second

There are no schools within one-quarter mile of the Project site. The nearest school is May Ranch Elementary School, which is located approximately 4,500 feet southeast of the Project site. Because there is no reasonable potential that TAC emissions would cause significant health impacts at distances of more than one-quarter mile from the air pollution source, there would be no significant impacts that would occur to any schools in the vicinity of the Project.

The modeled emission sources are illustrated on **Figure 4.2-2, Modeled On-Site Emissions Sources**, for on-site sources and **Figure 4.2-3, Modeled Off-Site Emissions Sources**, for off-site sources. The modeling domain is limited to the Project's primary truck route and includes off-site sources in the Project study area for more than three quarters of a mile. This modeling domain is more inclusive and conservative than using only a one quarter of a mile modeling domain which is the distance supported by several reputable studies which conclude that the greatest potential risks occur within a one quarter of a mile of the primary source of emissions (CARB 2005) (in the case of the Project, the primary source of emissions is the on-site idling and on-site travel).

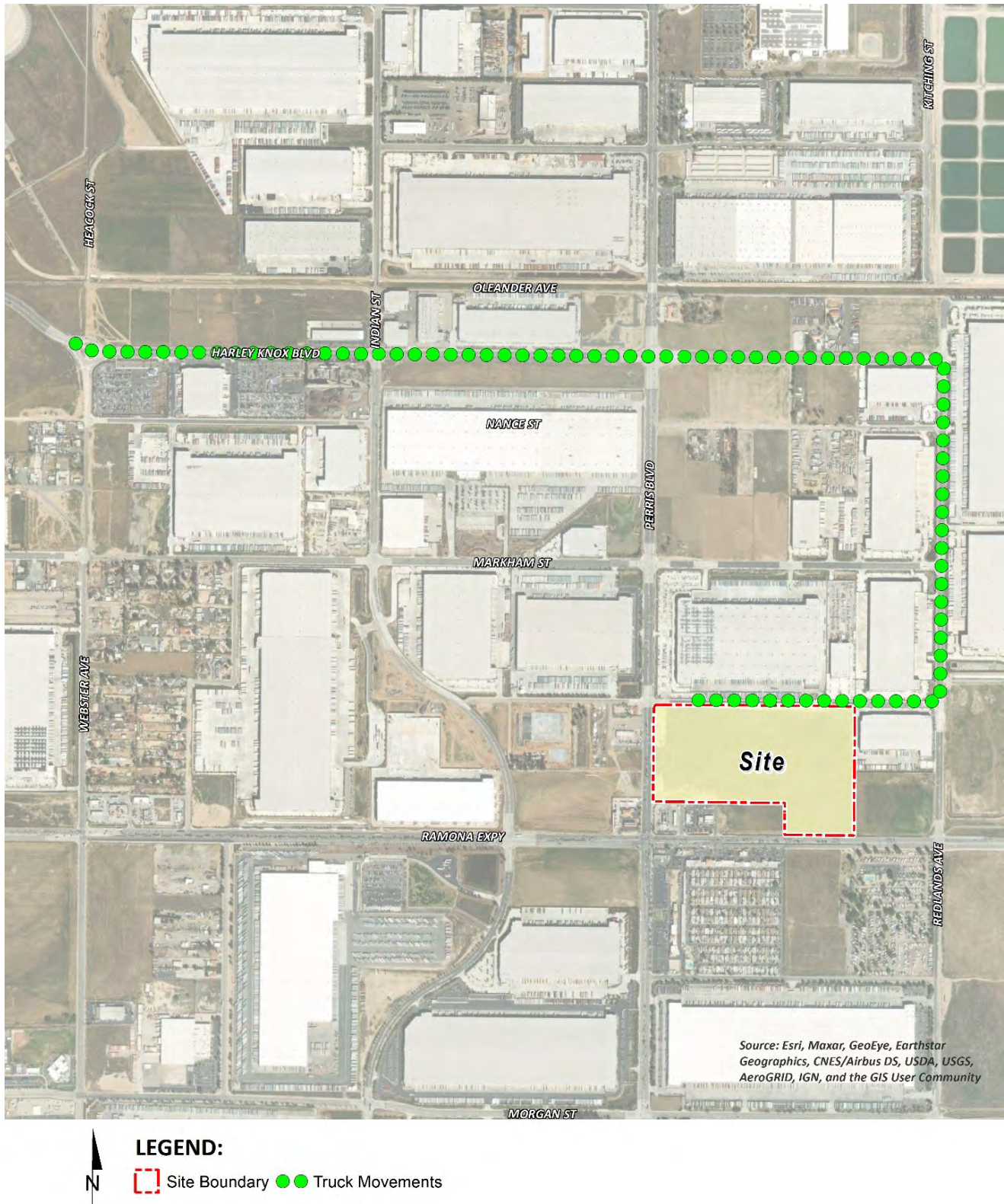
On-site truck idling was estimated to occur as trucks enter and travel through the Project site. Although the Project's diesel-fueled truck and equipment operators would be required by State law to comply with CARB's idling limit of 5 minutes, staff at SCAQMD recommends that the on-site idling emissions be calculated assuming 15 minutes of truck idling (SCAQMD 2003a), which would consider on-site idling which occurs while the trucks are waiting to pull up to the truck bays, idling at the bays, idling at check-in and check-out, etc. As such, the Project HRA calculates truck idling at 15 minutes, consistent with the SCAQMD's recommendation.



LEGEND:

- Site Boundary
- Loading Dock Activity
- Truck Movements

Source: Urban Crossroads, 2022



Source: Urban Crossroads, 2022

The Project is expected to generate a total of approximately 9,266 vehicular trip-ends (actual vehicles) per day (4,633 vehicles inbound and 4,633 vehicles outbound) which includes 8,972 two-way passenger car trip-ends (4,486 passenger cars inbound and 4,486 passenger cars outbound) and 294 two-way truck trip-ends per day (147 trucks inbound and 147 trucks outbound).

The results of the modeling are described below for residential, worker, and school child exposures.

Residential Exposure Scenario: The residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R4 which is located approximately 306 feet south of the Project site at an existing residence located at 80 East Dawes Street. Since there are no private outdoor living areas (backyards) facing the project site, R4 is placed at the building façade. At the MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 0.49 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 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 would not cause a significant human health or cancer risk to nearby residences.

*Worker Exposure Scenario:*¹ The worker receptor land use with the greatest potential exposure to Project operational-source DPM emissions is Location R6, which represents the potential worker receptor approximately 53 feet east of the Project site. At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact is 0.25 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 analyzed 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 would not cause a significant human health or cancer risk to adjacent workers.

School Child Exposure Scenario: 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 (CARB 2005). The 1,000-foot evaluation distance is 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. A one-quarter mile radius, or 1,320 feet, is commonly utilized for identifying sensitive receptors, such as schools, that may

¹ SCAQMD guidance does not require assessment of the potential health risk to on-site workers. Excerpts from the document OEHHHA Air Toxics Hot Spots Program Risk Assessment Guidelines—The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHHA 2003), also indicate that it is not necessary to examine the health effects to on-site workers unless required by RCRA (Resource Conservation and Recovery Act) / CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) or the worker resides on-site.

be impacted by a proposed Project. This radius is more robust than, and therefore provides a more health protective scenario for evaluation than the 1,000-foot impact radius identified above.

Conclusion

Based on the discussion of Project-generated air pollutant emissions at sensitive receptors discussed above, including the LST analysis, CO hot spots analysis, and the HRA prepared for the Project, the Project would not exceed thresholds for impacts to sensitive receptors during construction or operational activities. As such, sensitive receptors would not be exposed to substantial pollutant concentrations during Project construction or operation, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold d: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact Analysis

Land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the Project's long-term operation. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. While restaurants may result in some odors from the cooking process, these odors are not typically considered objectionable. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project construction and operations would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Impacts would be less than significant.

4.2.5 Cumulative Impacts

As discussed in Section 4.2.3, the SCAQMD has published a report on how to address cumulative impacts from air pollution, and projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. As discussed for threshold (a) above, the Project would be consistent with the SCAQMD 2022 AQMP. Therefore, the Project would not contribute to a significant cumulative impact regarding AQMP inconsistencies.

As previously discussed, the CAAQS designate the Project area as nonattainment for O₃, PM₁₀, and PM_{2.5} while the NAAQS designates the Project area as nonattainment for O₃ and PM_{2.5}. The Project-specific evaluation of emissions presented in the preceding analysis demonstrates that proposed Project's construction-source air pollutant emissions would not result in exceedances of regional thresholds. Therefore, proposed Project construction-source emissions would be considered less than significant on a project-specific and cumulative basis. The proposed Project has the potential to result in cumulative impacts associated with on-going operations for emissions of VOCs, NO_x, and CO. Even with implementation of the PVCCSP EIR operational mitigation measures and additional Project-specific mitigation measures MM AQ-1 through MM AQ-13, operational VOC and NO_x emissions would exceed the regional significance thresholds. The operational emissions are primarily associated with vehicle emissions. The City of Perris and the Project Applicant do not have regulatory authority to control tailpipe emissions and no additional feasible mitigation measures beyond the measures identified herein exist that would reduce VOC and NO_x emissions to levels below the regional thresholds established by the SCAQMD. Therefore, operation of the Project would result in a significant and unavoidable cumulatively considerable net increase of a criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard. Therefore, the proposed Project would have the potential to result in a cumulatively considerable significant impact with respect to operational activity.

As discussed for threshold (c), the Project would not exceed SCAQMD LST thresholds during either construction or operation, would not cause or contribute to CO hot spots, and would not result in cancer risk or health hazards exceeding the SCAQMD thresholds of significance of 10 in one million and 1.0, respectively. Consistent with SCAQMD guidance on how to address cumulative impacts from air pollution discussed above, since the Project does not exceed the applicable health risk thresholds and does not result in a significant impact on an individual basis, it would not contribute to a cumulatively considerable significant impact to sensitive receptors. Cumulative health risk impacts would be less than significant.

The Project would result in a less than significant impacts associated with odors, as the Project does not include land uses typically associated with the generation of odors or other emissions that could affect a substantial number of people. Thus, Project-related odor impacts would be less than cumulatively considerable.

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4.3 BIOLOGICAL RESOURCES

This section assesses the potential for the Project to impact biological resources. Unless otherwise noted, the analysis in this section is based on information contained in the following Project-specific technical reports prepared by Principe and Associates, which are included in Appendices D, E, and F of this Draft EIR:

- Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis. 2022a (Appendix D)
- Nesting Season Survey for Burrowing Owl. 2022b (Appendix E)
- MSHCP Narrow Endemic Plant and Criteria Area Species Focused Surveys. 2022c (Appendix F)

An additional biological survey was prepared for the Project. A Wet Season Vernal Pool Branciopod Sampling prepared by Frank Wegscheider, 2022, which is included as Appendix G of this Draft EIR.

There was one comment received on the 2023 NOP from the California Department of Fish and Wildlife (CDFW) regarding biological resources. Specifically, the CDFW requested that the DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and associated habitat. The CDFW also requests the DEIR include a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project. There were no comments addressing biological resources raised at the July 20, 2022 Draft EIR public scoping meeting.

4.3.1 Existing Setting

The Project site is vacant and is primarily comprised of disturbed vegetation and habitat that is dominated by a low carpet of non-native grass and weeds. Native vegetation and habitats within Project site boundaries have been eliminated due to long-term disturbances associated with agricultural uses and weed abatement activities. The resulting site condition is heavily disturbed with compacted surface soils. One large detention basin is present in the western portion of the site, where wind-blown trash accumulates. The vacant Project site is used for illegal trash dumping. An abandoned water stack (i.e., agricultural water source) likely associated with previous agricultural uses is in the central portion of the Project site. A drainage ditch is located within the Project site, near the Project's southern property line, adjacent to Ramona Expressway.

Historical uses for the Project site were determined based on a review and evaluation of aerial photographs. Between 1938 and 1985, the Project site was undeveloped, vacant, and in a rural agricultural setting, with agricultural land uses occurring on the majority of the Project site in aerial photographs from 1949, 1953, and 1961. The detention basin located in the western portion of the site and the drainage ditch located in the southern portion of the site, along the north side of Ramona Expressway were first observed in a 1966 aerial photograph. From 1985 to the present, the Project site has remained undeveloped and vacant. The area surrounding the Project site began developing during this period, with residential, commercial, and industrial development. In a 1997 aerial photograph, the southwest corner of the Project site had been cleared and was being used as a staging area for a

commercial development occurring at the intersection of North Perris Boulevard and Ramona Expressway. This portion of the site has remained disturbed since completion of the commercial development and is currently being used for trailer truck parking on a daily basis.

4.3.1.1 Topography

The natural topography of the Project site has been altered by past long-term disturbances associated with agricultural and weed abatement activities. The Project site is relatively flat, with elevations ranging from 1,452 feet amsl in the eastern and southern portions of the site, up to 1,456 feet amsl in the northern and western portions of the Project site. A manufactured slope is present along the northern property line, adjacent to Perry Street, with the majority of the Project site located 10 to 15 feet below the elevation of Perry Street.

4.3.1.2 Hydrography and Drainage

The Project site consists of vacant, undeveloped land that drains gradually from the northwest portion of the site to the southeast, over varying terrain with a flow slope of 0.3 percent. The runoff from the site is primarily overland flow of downslope movement of stormwater runoff (sheet flow) originating on the slightly higher elevated terrain in the northern and western portions of the Project site. The storm water runoff is characterized by low volume, and infrequent and short duration flows that only occur during and after precipitation events. There are no flow paths through the Project site. The ultimate outfall is the southeastern corner of the Project site, into the existing drainage ditch on site. Drainage in the westernmost portion of the Project site drains to the new storm water and flood control conveyance systems constructed when North Perris Boulevard was improved (circa 2016). The Project site is within the Perris Valley Master Drainage Plan, with the proposed Line E regional storm drain traversing the southwestern corner of the Project site.

There are no natural water courses within the Project site. The San Jacinto River is located approximately 4.5 miles southeast of the Project site. Due to the low elevation of the Project site, most of the Project site is located within the 100-year flood plain.

4.3.1.3 Soils

Surficial soils at the Project site are included in the Traver-Domino-Willows Association. Within this association, five soil types have been mapped at the Project site including the following as shown on **Figure 4.3-1, On-Site Soils**:

- Dv – Domino silt loam, 0-2 percent slopes (saline-alkali)
- EnA – Exeter sandy loam, 0 to 2 percent slopes
- EpA - Exeter sandy loam, deep, 0 to 2 percent slopes
- HcA – Hanford coarse sandy loam, 0 to 2 percent slopes
- PaA - Pachappa fine sandy loam, 0 to 2 percent slopes



Source: Principle and Associates, 2022

4.3.1.4 Vegetation

Vegetation at the Project site consists of approximately 41.1 acres of non-native grasslands and approximately 7.0 acres of disturbed/developed lands. These vegetation types are described in more detail below. It should be noted that the acreage for the biological resources study area (i.e., 48.1 acres) includes off-site areas outside the Project site boundaries. As such, the total acreage of the study area is greater than that of the Project site (i.e., 46.1 acres), as Shown on **Figure 4.3-2, Vegetation Communities**.

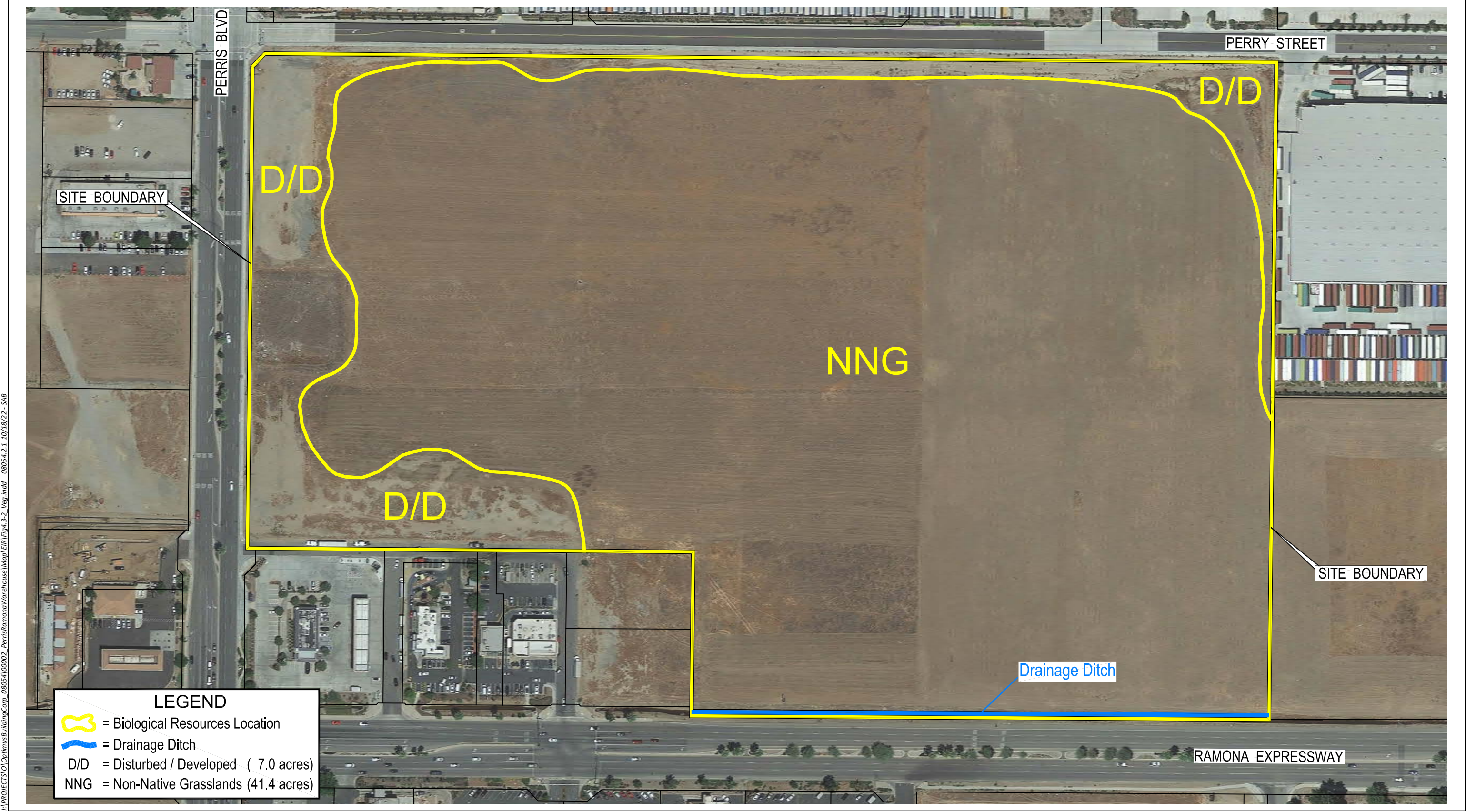
Non-Native Grasslands

Non-native grasslands are primarily composed of annual grass species introduced from the Mediterranean basin and other Mediterranean-climate regions with variable presence of non-native and native herbaceous species. Species composition of non-native grasslands may vary over time and place based on grazing or fire regimes, soil disturbance and annual precipitation patterns. Non-native grasslands typically produce deep layers of organic matter which is inversely related to the abundance of non-native and native species. Non-native grasslands also typically support an array of annual species from the Mediterranean-climate regions. Low abundances of native species are sometimes present within non-native grasslands.

Non-native grasslands cover the majority of the site surface. It is growing on all previously disturbed areas that were historically disced for agricultural land uses and more recently for weed abatement to reduce fuel loads in areas where fire could threaten both human safety and property. Species composition is not diverse, but a few of the species are very abundant. The low-growing grasses and weeds form a continuous and dense cover on the surface of the site. Most of it is dominated by common and widespread non-native grass and weed. Dicot species include the following non-native species: dog mayweed (*Anthemis cortula*), prickly lettuce (*Lactuca serriola*), common groundsel (*Senecio vulgaris*), stink-net (*Oncosiphon piluliferum*), shortpod mustard (*Brassica geniculata*), tumble mustard (*Sisymbrium altissimum*), London rocket (*Sisymbrium irio*), Russian-thistle (*Salsola tragus*), field bindweed (*Convolvulus arvensis*), long-beak filaree (*Erodium botrys*), and cheeseweed (*Malva parviflora*). Monocot species include the following non-native species: wild oat (*Avena sativa*), common ripgut grass (*Bromus diandrus*), red brome (*Bromus madritensis* subsp. *rubens*), glaucous barley (*Hordeum murinum* subsp. *glaucum*), hare barley (*Hordeum murinum* subsp. *leporinum*), annual bluegrass (*Poa annua*), and rattail fescue (*Vulpia myuros* var. *myuros*). The only native species discovered in the on-site non-native grasslands was common fiddleneck (*Amsinckia menziesii* var. *intermedia*).

Disturbed/Developed Land

Weed communities are common in urban areas, often occurring on roadsides and abandoned areas. In larger areas these weed populations may represent the early stages of natural succession. Some of these areas are known as ruderal communities. A ruderal community occupies waste areas, and roadsides often on heavily compacted soils with little available oxygen. Disturbed/Developed Lands are located around the perimeter of most of the Project site. This disturbed habitat supports non-native grasses and weeds growing on disturbed ground, manufactured slopes, stockpiles of excavated earthen materials, gravel, and soils compacted by trailer trucks and construction equipment.



Source: Principle and Associates, 2022

Non-native species observed include prostrate pigweed (*Amaranthus blitoides*), prickly lettuce, common groundsel, stink-net, shortpod mustard, Australian saltbush (*Atriplex semibaccata*), Russian-thistle, long-beak filaree, Bermuda grass (*Cynodon dactylon*), hare barley, Mediterranean schismus (*Schismus barbatus*), and rattail fescue. One native species, southern goldfields (*Lasthenia coronaria*) was found growing in the southwest corner of the site only during one of the biological surveys conducted at the Project site (February 2022). This species was confined to a patch approximately one-tenth of an acre in size located in the disturbed area previously used as a staging area for the commercial development occurring at the intersection of North Perris Boulevard and Ramona Expressway. It usually occurs in coarse sandy upland soils which are present in this portion of the site.

Emergent non-native vegetation growing on the banks and in the channel of the ditch near the southern property boundary were manually removed and an herbicide was applied in March 2022. Alfalfa (*Medicago sativa*) and English plantain (*Plantago lanceolata*) are the only two species growing in abundance along the channel and banks of the drainage ditch.

4.3.1.5 Wildlife Species Observed

During field surveys for the Project, a low abundance and diversity of wildlife was observed at the site. This low abundance is likely due to the absence of native wildlife habitats within and around the Project site. All wildlife species were observed in the non-native grasslands and none occurred within the disturbed/developed land portion of the Project site. The species composition consists of common and opportunistic species that are adapted to exploit available habitats or resources near man. Species observed include the western fence lizard (*Sceloporus occidentalis*), sideblotched lizard (*Uta stansburiana*), mourning dove (*Zenaida macroura*), American crow (*Corvus brachyrhynchos*), horned lark (*Eremophila alpestris*), northern rough-winged swallow (*Stelgidopteryx serripennis*), Savannah sparrow (*Passerculus sandwichensis*), white-crowned sparrow (*Zonotrichia leucophrys*), western meadowlark (*Sturnella neglecta*), house sparrow (*Passer domesticus*), and California ground squirrel (*Spermophilus beecheyi*). Diagnostic animal signs were limited to Botta's pocket gopher dirt mounds (*Thomomys bottae*), and a juvenile coyote carcass (*Canis latrans*).

4.3.2 Existing Policies and Regulations

4.3.2.1 Federal

Federal Endangered Species Act

Administered by the United States Fish and Wildlife Service (USFWS), the federal Endangered Species Act (FESA) provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Actions that impact endangered or threatened species and the habitats upon which they rely are considered a "take" under the FESA. Section 9(a) of the FESA defines take as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." "Harm" and "harass" are further defined in federal regulations and case law to include actions that adversely impair or disrupt a listed species' behavioral patterns.

Sections 4(d), 7, and 10(a) of the FESA regulate actions that could jeopardize endangered or threatened species. Section 7 describes a process of federal interagency consultation for use when federal actions may adversely affect listed species. A biological assessment is required for any major construction activity if it may affect listed species. In this case, take can be authorized via a letter of biological opinion

issued by the USFWS for non-marine related listed species issues. A Section 7 consultation is required when there is a nexus between federally listed species' use of the site and impacts to United States Army Corps of Engineers (USACE) jurisdictional areas. Section 10(a) allows issuance of permits for "incidental" take of endangered or threatened species. The term "incidental" applies if the taking of a listed species is incidental to and not the purpose of an otherwise lawful activity.

Federal Clean Water Act

Federal wetland regulation (non-marine issues) is guided by the Rivers and Harbors Act of 1899 and the Clean Water Act (CWA). The Rivers and Harbors Act deals primarily with discharges into navigable waters, while the purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all water of the U.S. Permitting for projects filling water of the U.S., including wetlands and vernal pools, is overseen by the USACE under Section 404 of the CWA. Projects may be permitted on an individual basis or may be covered under one of several approved Nationwide Permits. Individual Permits are assessed individually based on the type of action, amount of fill, etc. Individual Permits typically require substantial time (often longer than six months) to review and approve, while Nationwide Permits are pre-approved if a project meets the appropriate conditions. A CWA Section 401 Water Quality Certification, which is administered by the State Water Resources Control Board, must be issued prior to any 404 Permit.

Migratory Bird Treaty Act

All migratory bird species that are native to the United States or its territories are protected under the federal Migratory Bird Treaty Act (MBTA), as amended under the Migratory Bird Treaty Reform Act of 2004 (FR Doc. 05-5127). The MBTA is generally protective of migratory birds but does not actually stipulate the type of protection required. In common practice, the MBTA is used to place restrictions on disturbance of active bird nests during the nesting season, which is generally defined as February 15 to August 31 for songbirds. In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests, which the nesting season is generally defined as January 15 to August 31.

4.3.2.2 State

California Endangered Species Act

The California Endangered Species Act (CESA) is similar to the FESA in that it contains a process for listing of species and regulating potential impacts to listed species. Section 2081 of the CESA authorizes CDFW to enter into a memorandum of agreement for take of listed species for scientific, educational, or management purposes. The golden eagle and white-tailed kite are considered State Fully Protected (SFP) species. A SFP species may not be taken or possessed at any time, and no state licenses or permits may be issued for their take except for collecting the species necessary for scientific research and relocation of the bird species for the protection of livestock (Fish and Game Code Sections 3511, 4700, 5050, and 5515).

The Native Plant Protection Act (NPPA) enacted a process by which plants are listed as rare or endangered. The NPPA regulates the collection, transport, and commerce of plants that are listed. The CESA followed the NPPA and covers both plants and wildlife that are determined to be endangered or threatened with extinction. Plants listed as rare under NPPA were designated threatened under the CESA.

California Fish and Game Code

Protection of Raptor Species. Raptors (birds of prey) and owls and their active nests are protected by California Fish and Game Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW.

Streambed Alteration Agreement. The CFG Code (Section 1600 et seq.) requires an agreement with the CDFW for projects affecting riparian and wetland habitats through the issuance of a Streambed Alteration Agreement.

4.3.2.3 Local

Stephens' Kangaroo Rat Habitat Conservation Plan

The Stephens' Kangaroo Rat (SKR) Habitat Conservation Plan (HCP) was prepared under the direction of the Riverside County Habitat Conservation Agency (RCHCA) Board of Directors, in consultation with the USFWS and the CDFW. The Project site is located within the boundary of the adopted SKR HCP. The 30-year SKR HCP was designed to acquire and permanently conserve, maintain, and fund the conservation, preservation, restoration, and enhancement of Stephens' kangaroo rat-occupied habitat. The SKR HCP covers approximately 534,000 acres within the member jurisdictions and includes an estimated 30,000 acres of occupied Stephens' kangaroo rat habitat. The SKR HCP mitigates impacts from development on the SKR by establishing a network of preserves and a system for managing and monitoring SKR. Through implementation of the SKR HCP, permanent conservation of approximately 50 percent of the SKR-occupied habitat remaining in the HCP area has occurred. The Project site is located within the Stephens' Kangaroo Rat Mitigation Fee Area.

Western Riverside County Multiple Species Habitat Conservation Plan

The MSHCP serves as a comprehensive multi-jurisdictional HCP, pursuant to Section (a)(1)(B) of the federal Endangered Species Act of 1973, as well as a Natural Communities Conservation Plan (NCCP) under the State Natural Community Conservation Planning Act of 2001. The plan "encompasses all unincorporated Riverside County land west of the crest of the San Jacinto mountains to the Orange County line, as well as the jurisdictional areas of the Cities of Temecula, Murrieta, Lake Elsinore, Canyon Lake, Norco, Corona, Riverside, Moreno Valley, Banning, Beaumont, Calimesa, Perris, Hemet, and San Jacinto." The overall biological goal of the MSHCP is to conserve covered species and their habitats, as well as maintain biological diversity and ecological processes while allowing for future economic growth within a rapidly urbanizing region.

The USFWS and CDFW have issued permits pursuant to the FESA and the California Natural Community Conservation Planning Act authorizing "Take" of certain species in accordance with the terms and conditions of the acts, the Western Riverside County MSHCP, and the associated Implementing Agreement. Under the acts, certain activities by the applicant will be authorized to "Take" certain species, provided all applicable terms and conditions of the acts, MSHCP and the associated Implementing Agreement are met. With the take permits issued to the County, 118 of 146 species covered by the MSHCP will be adequately conserved. The MSHCP has addressed the federal, State, and local project-specific mitigation requirements for each of these species and their specific habitats. The MSHCP will mitigate direct, indirect, and cumulative impacts resulting from the take of these 118 adequately conserved species by establishing and maintaining a reserve system consisting of

approximately 500,000 acres (347,000 acres are currently within public ownership, and 153,000 acres are currently in private ownership).

To implement the goals and objectives of the MSHCP and to mitigate the impacts caused by new development, lands supporting species covered by the MSHCP must be acquired and conserved. A development fee is necessary to supplement the financing of the acquisition of lands supporting species covered by the MSHCP and to pay for new development's fair share of this cost. The appropriate funding source to pay the costs associated with mitigating the impacts of new development to the natural ecosystems and covered species is a fee for residential, commercial, and industrial development. The amount of the fee is determined by the nature and extent of the impacts from the development to the identified natural ecosystems and the relative cost of mitigating such impacts.

City of Perris Ordinance No. 1123

The City of Perris established a local development mitigation fee for funding the preservation of natural ecosystems in accordance with the MSHCP. The proposed Project is subject to the local development mitigation fee for funding required by City of Perris Ordinance No. 1123. Commercial and Industrial facilities are assessed a fee of \$5,620 per acre.

City of Perris General Plan Conservation Element

The following goals, policies, and supporting measures are included in the City of Perris General Plan Conservation Element would be applicable to the Project:

Goal II – Preservation of areas with significant biotic communities

Policy II.A - Comply with state and federal regulations to ensure protection and preservation of significant biological resources.

Implementation Measures

- II.A.1 Maintain a database and resource identification map that identifies areas known, or with the potential to contain, sensitive plant and wildlife species.
- 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.
- II.A.3 For those public and private projects that are also subject to federal or State approval with respect to impacts to Waters of the U.S. and/or Streambeds, require evidence of completion of the applicable federal permit process prior to the issuance of a grading permit.

Goal III– Implementation of the MSHCP

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.

4.3.2.4 Applicable PVCCSP Standards and Guidelines and Mitigation Measures

There are no PVCCSP Standards and Guidelines applicable to the analysis of biological resources for the Project; however, the PVCCSP EIR contains the following biological mitigation measures for the PVCCSP and implementing projects:

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 PVCC 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 for 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.

MM Bio 2 Project-specific habitat assessments and focused surveys for burrowing owls will be conducted for implementing development or infrastructure projects within burrowing owl survey areas. A pre-construction survey for resident burrowing owls will also be conducted by a qualified biologist within 30 days prior to commencement of grading and construction activities within those portions of the 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 will 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 CDFW. 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 the owls from their burrows (outside the breeding season or once the young can 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 CDFW 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 unfeasible, then a Determination of Biologically Equivalent or Superior Preservation (DBESP) will be required, including associated relocation of burrowing owls. If conservation is not required, then owl relocation will still be required following accepted protocols. Take of active nests will be avoided, so it is strongly recommended that any relocation occur outside of the nesting season.

MM Bio 3 Project-specific delineations will be required to determine the limits of USACE, Regional Water Quality Control Board (RWQCB), and CDFW jurisdiction for implementing projects that may contain jurisdictional features. Impacts to jurisdictional waters will require authorization by the corresponding regulatory agency. If impacts are indicated in an implementing project-specific delineation, prior to the issuance of a grading permit, such implementing projects will obtain the necessary authorizations from the regulatory agencies for proposed impacts to jurisdictional waters. Authorizations may include, but are not limited to, a Section 404 permit from USACE, a Section 401 Water Quality Certification from the RWQCB, and a Section 1602 Streambed Alteration Agreement from CDFW.

MM Bio 4 Project-specific mapping of riparian and unvegetated riverine features will be required for implementing projects pursuant to Section 6.1.2 of the MSHCP. For areas not excluded as artificially created, the MSHCP requires 100 percent avoidance of riparian/riverine areas. If for any implementing project avoidance is not feasible, then such implementing projects will require the approval of a DBESP including appropriate mitigation to offset the loss of functions and values as they pertain to the MSHCP and covered species. Riparian vegetation will also need to be evaluated for the least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo.

MM Bio 5 Project-specific mapping of vernal pools for implementing projects will be required pursuant to 6.1.2 of the MSHCP. For areas not excluded as artificially created, the MSHCP requires 100 percent avoidance of vernal pools. If for any implementing project avoidance is not feasible, then such implementing projects will require the approval of a DBESP including appropriate mitigation to offset the loss of functions and values as they pertain to the MSHCP and covered species. Vernal pools and other seasonal ponding depressions will also need to be evaluated for listed fairy shrimp.

MM Bio 6 Within areas of suitable habitat associated with the Narrow Endemic Plant Species Survey (NEPSSA) and Criteria Area Plant Species Survey area (CAPSSA), focused plant

surveys will be required for implementing projects. The MSHCP requires at least 90 percent avoidance of areas providing long-term conservation value for the NEPSAA and CAPSSA target species. If avoidance is not feasible, then such implementing projects will require the approval of a DBESP including appropriate mitigation.

The Project would comply with the applicable measures listed above, including PVCCSP EIR mitigation measures MM Bio 1, MM Bio 2, MM Bio 5, and MM Bio 6, as further detailed in Section 4.3.4, *Environmental Impacts*, below. PVCCSP EIR mitigation measures MM Bio 3 and MM Bio 4 are not applicable to the Project, as no jurisdictional features, riparian, or unvegetated riverine features are present at the Project site.

4.3.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, a significant impact associated with biological resources would occur if implementation of the project 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 CDFW or USFWS;
- 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 CDFW or USFWS;
- 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;
- 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;
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- f) Conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan.

4.3.4 Environmental 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 CDFW or USFWS?

Impact Analysis

Twelve federal, State, and California Native Plant Society (CNPS)-listed plant species have been reported to occur within the Perris quadrangle; however, based on growing habitats and geographic ranges, all 12 plant species were determined to be absent or to have no probability of occurring at the Project site. No impacts to federal, State, or CNPS-listed plant species would occur.

Twenty-three federal and State listed wildlife species have been reported to occur within the Perris quadrangle. Based on required habitats and geographic ranges, all 23 species were determined to be either absent or have no probability to occur on the Project site. No impact to federal or State listed wildlife species would occur.

Thirty-six listed wildlife species and two listed plant species are included in the California Natural Diversity Database (CNDDDB) for the Perris, California Quadrangle from within one, two and three miles of the Project site; however, the CNDDDB does not include any occurrence records of listed wildlife and plant species on the Project site.

The MBTA of 1918 (United States Code 703711) is an international treaty that makes it unlawful to take, possess, buy sell, purchase, or barter any migratory bird listed in 50 CFR Part 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). In addition, Sections 3503, 3503.5, and 3800 of the CDFG Code prohibit the take, possession, or destruction of birds, their nests, or eggs. Suitable nesting habitats for migratory birds are present on the Project site. The non-native grasslands on the Project site provide potential nesting habitats for ground dwelling migratory bird species. The bird species observed at the site during biological surveys are bird species governed by the MBTA, and are listed in 50 CFR Part 10. The MBTA requires that Project-related disturbances at active nesting territories be reduced or eliminated during critical phases of the nesting cycle. The removal of vegetation and/or destruction of nests during the breeding season would be a potentially significant, requiring mitigation.

Focused surveys were conducted at the Project site consistent with the requirements of the MSHCP (refer to the discussion for *Threshold f* for more details regarding MSHCP requirements), and PVCCSP EIR mitigation measures MM Bio 2, MM Bio 5, and MM Bio 6. These focused surveys included fairy shrimp surveys, Narrow Endemic Plant and Criteria Area Plant Species Focused Surveys, and burrowing owl surveys, as discussed in more detail below.

The Project site contains a detention basin, which require evaluation for listed fairy shrimp, consistent with MSHCP requirements and PVCCSP EIR mitigation measure MM Bio 5. During 2021 dry season vernal pool branciopod sampling at the Project site, no cysts of the federally-listed Riverside fairy shrimp were found in the sampled detention basin at the Project site. No inundation of the detention basin occurred during the 2022 wet season; therefore, wet season sampling was not possible, and the absence of listed fairy shrimp could not be confirmed. To complete the fairy shrimp surveys (based on the USFWS protocol, USFWS 2017), one wet season and one dry season survey are required. As discussed, the 2021 dry season survey yielded negative results for listed species of fairy shrimp. Due to the absence of inundation for the detention basin for the 2022 wet season, a 2023 protocol wet season survey would be required. Thus, the federally-listed Riverside fairy shrimp are presumed present until the 2023 wet season survey can be completed. The implementation of the Project could result in potentially significant impacts to the federally listed Riverside fairy shrimp.

Narrow Endemic Plant and Criteria Area Plant Species Focused Surveys were conducted at the Project site, consistent with MSHCP requirements and PVCCSP EIR mitigation measure MM Bio 6. None of the listed Narrow Endemic Plant and Criteria Area Species were identified at the Project site during the 2022 survey season. Further, nesting season burrowing owl surveys were conducted at the Project site, consistent with PVCCSP EIR mitigation measure MM Bio 2 and no burrowing owls were observed during any of the 2022 nesting season surveys. However, the Project site contains suitable nesting habitat for

burrowing owls and, as such, the implementation of the Project could result in potentially significant impacts to burrowing owls.

Mitigation Measures

The Project is required to implement PVCCSP EIR mitigation measures MM Bio 1 and MM Bio 2. These have been replaced with the following Project-specific mitigation measures MM BIO-1, MM BIO-2, and MM BIO-3 based on input from the CDFW:

Project-Specific 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 the Project shall be avoided, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species (generally February 1 to September 15 although the nesting season may be extended due to weather and drought conditions).

If site-preparation activities are proposed during the nesting/breeding season, the Project proponent shall retain a qualified biologist to conduct a pre-activity field survey prior to the issuance of grading permits for the 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 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, the biologist shall immediately establish a conservative avoidance buffer surrounding the nest based on their best professional judgement and experience. The biologist shall monitor the nest at the onset of Project activities, and at the onset of any changes in such Project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer.

If the biologist determines that such Project activities may be causing an adverse reaction, the biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers will be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The on-site qualified biologist will review and verify compliance with these nesting avoidance buffers and will verify the nesting effort has finished.

Work can resume within these avoidance areas when no other active nests are found. Upon completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to the City of Perris Planning Division for mitigation monitoring compliance record keeping.

Project-Specific MM BIO-2: The Project proponent shall retain a qualified biologist to conduct a pre-construction survey for resident burrowing owls within 30 days prior to commencement of grading and construction activities on the Project site. The survey shall include the Project site and all suitable burrowing owl habitat within a 500-foot buffer. The results of the survey shall be submitted to the City of Perris Planning Division prior to obtaining a grading permit.

In addition, if burrowing owls are observed during the MBTA nesting bird survey, to be conducted within three days prior to ground disturbance or vegetation clearance, the observation shall be reported to the Wildlife Agencies. 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 will be conducted in accordance with the current Burrowing Owl Survey Instructions for the Western Riverside MSHCP.

If burrowing owls are detected, the CDFW shall be sent written notification by the City within three days of detection of burrowing owls. If active nests are identified during the pre-construction survey, the nests shall be avoided and the qualified biologist and Project proponent shall coordinate with the City of Perris Planning Division, the USFWS, and the CDFW to develop a Burrowing Owl Plan to be approved by the City in consultation with the CDFW and the USFWS prior to commencing Project activities. The Burrowing Owl Plan shall be prepared in accordance with guidelines in the CDFW Staff Report on Burrowing Owl (March 2012) and the MSHCP. The Burrowing Owl Plan shall describe proposed avoidance, minimization, relocation, and monitoring as applicable. The Burrowing Owl Plan shall include the number and location of occupied burrow sites and details on proposed buffers if avoiding the burrowing owls and/or information on the adjacent or nearby suitable habitat available to owls for relocation.

If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls may also be required in the Burrowing Owl Plan. The Project proponent shall implement the Burrowing Owl Plan following CDFW and USFWS review and concurrence.

A final letter report shall be prepared by the qualified biologist documenting the results of the Burrowing Owl Plan. The letter shall be submitted to the CDFW prior to the start of Project activities within the affected areas. When the qualified biologist determines that burrowing owls are no longer occupying the Project site per the criteria in the Burrowing Owl Plan, Project activities may begin within the affected areas.

If burrowing owls occupy the Project site after Project activities have started, then construction activities shall be halted immediately. The Project proponent shall notify the City of Perris Planning Division and the City shall notify the CDFW and the USFWS within 48 hours of detection. A Burrowing Owl Plan, as detailed above, shall be implemented.

In addition to the measures specified above, the following Project-specific mitigation shall be implemented:

Project-Specific MM BIO-3: Prior to commencement of ground-disturbing activities (i.e., earthwork, clearing, and/or grubbing), wet season focused surveys for federally listed fairy shrimp species shall be completed. The wet season surveys shall be conducted by a permitted biologist and follow the current USFWS survey protocol for large brachiopods (USFWS 2017). Survey results shall be submitted to USFWS following completion of the surveys. If listed fairy shrimp species are not detected during the wet season surveys, then ground-disturbing activities shall be allowed to commence on the Project site and no further mitigation is required.

If federally listed fairy shrimp are identified during the wet season surveys and the project cannot avoid occupied habitat, a DBESP assessment shall be completed to ensure that the proposed alternative provides for replacement of any lost functions and values of habitat. Project impacts to occupied listed

fairy shrimp habitat shall be accomplished through purchase of off-site mitigation credits at an agency-approved mitigation bank or in-lieu fee program, or through purchase of off-site land that supports occupied habitat at a ratio of no less than 2:1. If off-site land is purchased, the mitigation site shall be preserved in perpetuity through a conservation easement, deed restriction, or similar legal protection mechanism.

Level of Significance After Mitigation

Implementation of Project-specific mitigation measure MM BIO-1 would reduce potentially significant impacts to migratory birds to a less than significant level. Implementation of Project-specific mitigation measure MM BIO-2 would reduce potentially significant impacts to burrowing owl to a less than significant level. Implementation of Project-Specific mitigation measure MM BIO-3 would reduce potentially significant impacts associated with the federally-listed Riverside fairy shrimp to a less than significant level.

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 CDFW or USFWS?

Impact Analysis

Riparian habitat or other sensitive plant communities are not present at the Project site. Thus, the proposed Project would not 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 CDFW or USFWS. No impact would occur.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

There would be no impact.

Threshold c: Would the project 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?

Impact Analysis

As discussed in the Existing Setting, there is a drainage ditch near the Project's southern property line, adjacent to Ramona Expressway. This drainage ditch does not possess characteristics that meet the definition of a USACE jurisdictional Waters of the U.S., nor does it possess characteristics that could be classified as federally protected wetland as defined by Section 404 of the Clean Water Act. The Project site does not contain perennial or seasonal aquatic features that could be classified as federally protected wetlands. No impact to state or federally protected wetlands would occur as a result of Project implementation.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

There would be no impact.

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?

Impact Analysis

Wildlife movement corridors link together areas of suitable wildlife habitat that are otherwise separated by rugged terrain, changes in vegetation, by human disturbance, or by the encroachment of urban development. The fragmentation of natural habitat creates isolated 'islands' of vegetation that may not provide sufficient area to accommodate sustainable populations, and can adversely impact genetic and species diversity. Wildlife movement corridors can often mitigate the effects of fragmentation by (1) allowing animals to move between remaining habitats, thereby allowing depleted populations to be replenished; (2) providing escape routes from fire, predators and human disturbances, thus reducing the risk that catastrophic events such as fire or disease will result in population or local species extinction; and (3) serving as travel routes for individual animals as they move within their home ranges in search of food, water, mates, and other needs. Wildlife movement activities usually fall into one of three categories: (1) dispersal (defined as juvenile animals moving from natal areas and individuals extending range distributions); (2) seasonal migration; and (3) movements related to home range activities such as foraging for food or water, defending territories, or searching for mates, breeding areas or cover. A number of terms have been used in various wildlife movement studies, such as wildlife corridor, travel route, habitat linkage, and wildlife crossing, to refer to areas in which wildlife move from one area to another.

The Project site does not provide a wildlife movement corridor for juvenile animal dispersals, seasonal migrations, foraging movements for food or water, and/or for searching for mates, breeding areas or cover through this portion of Perris. The Project site is not located adjacent to expansive open spaces with native habitats. Also, the site does not provide a connection between two or more MSHCP designated or proposed core areas, habitat blocks or linkages that would otherwise be fragmented or isolated from one another that would result from development on the site. It does not contain suitable cover, food, or water for species to survive at the site and facilitate movement within a corridor. Therefore, future development at the site would not interfere with the movements of native wildlife species, established native wildlife corridors or uses of native wildlife nursery sites. No impact would occur.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

There would be no impact.

Threshold e: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact Analysis

Protected biological resources are not present on the Project site. As such, the Project would not result in conflicts with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Please refer to items a and f for further analysis regarding protected biological resources.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

There would be no impact.

Threshold f: Would the project conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan?

Impact Analysis

MSHCP Consistency

The Project site is located within the MSHCP; however, the Project site is not located within a Cell, Cell Group, or Sub Unit of the Mead Valley Area Plan portion of the MSHCP, and conservation is not required for the Project site. The Project site is located approximately 4.1 miles northwest of the nearest Western Riverside County Regional Conservation Agency Conserved Lands, located along a reach of the San Jacinto River. The Project site is located approximately 1.2 miles west of the nearest MSHCP Public/Quasi-Public Conserved Lands, which are at the Lake Perris State Recreation Area. The Project site is located approximately 2 miles from the nearest MSHCP Criteria Area, Cell #1432 of Cell Group B in the Motte/Rimrock Sub Unit of the Mead Valley Area Plan. The MSHCP states that conservation within this Cell Group will contribute to the assembly of Proposed Noncontiguous Habitat Block 4. Proposed Noncontiguous Habitat Block 4 is comprised of the Motte Rimrock Reserve. It provides Habitat for a number of Planning Species, including Quino checkerspot butterfly, coastal California gnatcatcher, and SKR. Maintenance of large intact interconnected habitat blocks is important for these species. Important to MSHCP Reserve Assembly, conservation within this Cell Group will range from 70 to 80 percent of the Cell Group focusing in the southern portion of the Cell Group B. The site is located approximately 2.3 miles northeast of the southern portion of Cell Group B where conservation within this Cell Group will contribute to the assembly of Proposed Noncontiguous Habitat Block 4. The Project site does not have a direct relationship to the assembly of Proposed Noncontiguous Habitat Block 4.

Section 6.0 of the MSHCP, the MSHCP Implementation Structure, imposes all other terms of the MSHCP, including but not limited to the protection of species associated with riparian/riverine areas and vernal pools, narrow endemic plant species, urban/wildlands interface guidelines, and additional survey needs and procedures set forth in Sections 6.1.1, 6.1.2, 6.1.3, 6.1.4, 6.3.2, and 6.4. The Project's consistency with each of these MSHCP sections are discussed in more detail below.

MSHCP Section 6.1.1 – Property Owner Initiated HANS

The Project site is not located within an area identified for conservation. Thus, a Habitat Evaluation and Acquisition Negotiation Strategy (HANS) Application is not needed, and the Project would be consistent with Section 6.1.1. of the MSHCP.

MSHCP Section 6.1.2 – Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools

The Project site does not contain natural watercourses with associated riparian vegetation and habitat; therefore, there are no biological resources present on the Project site that meet the MSHCP definition of Riparian Areas. Suitable riparian habitats for species listed in Section 6.1.2 of the MSHCP are not present at the Project site.

A drainage ditch is present in the southern portion of the Project site, along the north side of the Ramona Expressway. Storm water and surface water runoff originating on the slightly higher elevated terrain located in the northern and western portions of the site drains toward the southeast corner of the site. Some of this runoff water drains directly into the drainage ditch. This manmade feature also receives runoff water flow from Ramona Expressway and other developed areas located northeast and east of the site. As written, the drainage ditch meets the MSHCP definition of Riverine Areas: “areas with fresh water flow during all or a portion of the year;” however, there is no riparian vegetation or habitat associated with this ditch. Between the March and April 2022 biological surveys at the Project site, most of the invasive non-native vegetation growing on the banks and in the channel of the ditch was manually removed, and an herbicide was sprayed on the banks. The biological functions and values of Riverine Areas do not exist on the site. Suitable riverine habitats for the plant and animal species listed in Section 6.1.2 of the MSHCP are not present there.

Suitable fairy shrimp habitat was limited to the detention basin present at the Project site, which was sampled. The sampled basin contained a very low quantity of fairy shrimp cysts comprising the genus *Branchinecta*. No cysts of the federally listed Riverside fairy shrimp (*Streptocephalus woottoni*) were found in the sampled detention basin during the 2021 dry season sampling survey. Due to the absence of inundation for the detention basin for the 2022 wet season, a 2023 protocol wet season survey would be required. Thus, the federally-listed Riverside fairy shrimp are presumed present until the 2023 wet season survey can be completed (as required by Project-specific mitigation measure MM BIO-3). Other kinds of aquatic features that could provide suitable habitat for endangered and threatened species of fairy shrimp (e.g., vernal pools or swales, vernal pool-like ephemeral ponds, stock ponds or other human-modified depressions such as tire ruts, etc.) are not present on the site.

The onsite drainage ditch does not possess characteristics that meet the definition of a USACE jurisdictional ‘Water of the United States.’ The onsite drainage ditch does not possess characteristics that could be classified as a federally protected wetland as defined by Section 404 of the CWA. Also, other kinds of perennial or seasonal aquatic features that could be classified as federally protected wetlands are not present on the site (i.e., swamps, marshes, bogs, vernal pools, wet meadows and pastures, springs, and seeps, etc.). The site does not have a direct relationship to existing wetland regulations. Based on the discussions above for Riparian Areas, Riverine Areas, vernal pools, and wetlands, the Project is consistent with Section 6.1.2 of the MSCHP.

MSHCP Section 6.1.3 – Protection of Narrow Endemic Plant Species

As previously discussed, the Project site is located within a Narrow Endemic Plant Species Survey area, and the four Narrow Endemic Plant Species listed for the area include San Diego ambrosia, spreading navarretia, California Orcutt grass, and Wright's trichocoronis. Due to the presence of Domino silt loam (saline-alkaline), a soil growing habitat similar to the required soil habitats described for Narrow Endemic Plant Species, focused surveys were completed at the site. Focused surveys were conducted during the blooming periods for most of the four Narrow Endemic Plant Species.

During the 2022 survey season, none of the listed MSHCP Narrow Endemic Plant Species were identified at the site. The potential for Narrow Endemic Plant Species to occur on the site has been reduced over the years due to native vegetation and habitat removal by heavy equipment and subsequent annual weed abatement activities including discing, tilling and/or chain flail mowing/discing. These activities resulted in heavily disturbed and compacted soils with little available oxygen that no longer supports native plants or plant communities. Domino silt loam is only exposed on the surface in the northeast corner of the site on manufactured slopes and stockpiles as a result of the construction of Perry Street. Most of the site surface has been succeeded by invasive, non-native species. These low-growing grasses and weeds now form a continuous and dense cover on the surface of the site. There are now only a few openings where listed Narrow Endemic Plant Species could emerge and flourish. It appears that the non-native species have had such a competitive advantage over native species that they have prevented this disturbed area from providing growing habitats for any of them. As the surveys were conducted in accordance with the standardized guidelines issued by the regulatory agencies, results of the surveys provide reasonable evidence that the target Narrow Endemic Plant Species do not occur on the site. Within identified Narrow Endemic Plant Species Survey Areas, site-specific focused surveys for targeted species were completed for a private project where appropriate habitat is present. Therefore, focused surveys were necessary to ensure compliance with Section 6.1.3 of the MSHCP. The Project is consistent with Section 6.1.3 of the MSHCP.

MSHCP Section 6.1.4 – Guidelines Pertaining to the Urban/Wildlands Interface

The site does not have a direct relationship to the assembly of Proposed Noncontiguous Habitat Block 4. The site is located approximately 2.3 miles northeast of the southern portion of Cell Group B where conservation within this Cell Group will contribute to the assembly of Proposed Noncontiguous Habitat Block 4. As a 250-foot buffer is used in the MSHCP to complete an edge analysis, and the Project site is located 2.3 miles away, development at the Project site would not be subject to the treatment and management of edge conditions necessary to ensure that it provides habitat and movement functions for species using Proposed Noncontiguous Habitat Block 4. As such, the Project would not be subject to the Guidelines Pertaining to the Urban/Wildlands Interface such as lighting, urban runoff, toxics, and domestic predators as presented in Section 6.1.4 of the MSHCP and would be consistent with this section of the MSHCP.

MSHCP Section 6.3.2 – Additional Survey Needs and Procedures

The Project site is not located within an Amphibian Survey Area, a Mammal Survey Area, or an Invertebrate Survey Area for the MSHCP. The Project site is within the Burrowing Owl Survey Area and Narrow Endemic Plant and Criteria Area Species Surveys Areas.

The site is located within the Burrowing Owl Survey Area. Based on the Burrowing Owl Survey Instructions for the Western Riverside MSHCP Area, an independent assessment was made of the

presence or absence of suitable burrowing owl habitats on the site and in a 150-meter (approximately 500 feet) buffer zone around the project boundary on February 2, 2022. The assessment determined that the majority of the site and the buffer zone located immediately east and contiguous with the site were providing suitable habitats consisting of annual grassland on level terrain. Active small mammal burrows appear to be limited to those dug by pocket gophers. Required habitat features capable of being used for roosting and/or nesting were limited on the site, but included abandoned burrows of California ground squirrels with openings 4 inches or greater. In the buffer zone, only the habitat located south of the site across the Ramona Expressway provided suitable burrowing owl habitats consisting of annual grassland on level terrain with active small mammal burrows and abandoned California ground squirrel burrows.

The existing developed areas surrounding the site that are in the buffer zone, including the area under construction located to the west, did not provide suitable burrowing owl habitats, and were not surveyed. Nesting season surveys were conducted and included four surveys between March 14 and May 6, 2022. During the 2022 Nesting Season Survey, burrowing owls were not observed. Burrowing owl habitats capable of being used for nesting and roosting were not being used. Also, animal signs diagnostic of burrowing owls that are sometimes overlooked were not discovered anywhere on the Project site or in the buffer zone. There was no evidence of either active habitats presently being used by burrowing owls, or habitats abandoned within the last three years. The site has undergone long-term disturbances related to agricultural and vegetation removal activities such as discing and chain flail mowing. These activities have also resulted in the reduction or extirpation of prey species at the site. The disturbed and degraded nature of the site related to those activities and other human-related activities are likely reasons that burrowing owls do not occupy this site. Completion of this Nesting Season Survey is consistent with Species Conservation Objective 5 of the MSHCP that was developed for the burrowing owl. To ensure direct mortality of burrowing owls is avoided in the future, a pre-construction presence/absence survey should be conducted within 30 days prior to ground disturbance at the site, as required by Project-specific mitigation measure MM BIO-2. Compliance with Project-specific mitigation measure MM BIO-2 would ensure the Project is consistent with Species Conservation Objective 6 of the MSHCP.

The site is located within a Criteria Area Species Survey Area, with nine Criteria Area Species listed for the area, including San Jacinto Valley crownscale, Parish's brittlescale, Davidson's saltscale, thread-leaved brodiaea, roundleaved filaree, smooth tarplant, Coulter's goldfields, little mousetail, and mud nama. Due to the presence of Domino silt loam (saline-alkaline), a soil growing habitat similar to the required soil habitats described for seven of the Criteria Area Species, focused surveys were completed at the site. Focused surveys were conducted during the blooming periods for most of the seven of the Criteria Area Species.

During the 2022 survey season, none of the listed Criteria Area Species were identified at the site. The potential for Criteria Area Species to occur on the site has been reduced over the years due to native vegetation and habitat removal by heavy equipment and subsequent annual weed abatement activities including discing, tilling and/or chain flail mowing/discing. These activities resulted in heavily disturbed and compacted soils with little available oxygen that no longer supports native plants or plant communities. Domino silt loam is only exposed on the surface in the northeast corner of the site on manufactured slopes and stockpiles as a result of the construction of Perry Street. Most of the site surface has been succeeded by invasive, non-native species. These low growing grasses and weeds now form a continuous and dense cover on the surface of the site. There are now only a few openings where listed Criteria Area Species could emerge and flourish. It appears that the non-native species have had

such a competitive advantage over native species that they have prevented this disturbed area from providing growing habitats for any of them. As the surveys were conducted in accordance with the standardized guidelines issued by the regulatory agencies, results of the surveys provide reasonable evidence that the target Criteria Area Species do not occur on the site. Within identified Criteria Area Species Survey Areas, site-specific focused surveys for targeted species were completed for a private project where appropriate habitat is present. Therefore, focused surveys were necessary to ensure compliance with Section 6.3.2 of the MSHCP and CEQA.

MSHCP Section 6.4– Fuels Management

The site is not located adjacent to a MSHCP Conservation Area. Based on existing fuels management policies, fuels management would not be required for future land uses at the Project site. Mass grading to develop the Project would result in the removal of the existing non-native grasslands and disturbed/developed lands growing on the site that could threaten human safety or property during a fire. As such, the Project is consistent with Section 6.4 of the MSHCP.

Stephens' Kangaroo Rat Habitat Conservation Plan

The Project site is located with the Stephens' Kangaroo Rat Mitigation Fee Area. The Project Applicant would be required to pay the mitigation fee. No inconsistency with the SKR HCP would occur.

Mitigation Measures

Implementation of Project-specific mitigation measures MM BIO-2 and MM BIO-3 is required.

Level of Significance After Mitigation

Implementation of Project-specific mitigation measures MM BIO-2 and MM BIO-3 would ensure the Project is consistent with Species Conservation Objective 6 of the MSHCP.

4.3.5 Cumulative Impacts

The geographic scope for the analysis of cumulative impacts related to biological resources includes western Riverside County and accounts for all anticipated cumulative growth within this geographic area as represented by full implementation of the Riverside County General Plan. The MSHCP is a comprehensive, multi-jurisdictional HCP intended to enhance and maintain biological diversity and ecosystem processes while allowing future growth. As public and private development, including construction of buildings, structures, infrastructure, and all alterations of the land that are implemented within areas that are outside of the Criteria Area are permitted under the MSHCP, cumulative impacts would be less than significant provided the terms of the MSHCP are fully implemented. The Project complies with the requirements of the MSHCP as demonstrated above, and, thus, would not conflict with its adopted policies. Cumulative impacts to the 146 special-status species covered by the MSHCP, are fully addressed within the MSHCP, and are considered less than significant.

The Project would not result in impacts to riparian communities, sensitive natural communities, state or federally protected wetlands, or wildlife corridors. As such, the Project would not contribute to cumulative impacts associated with these resources.

With mandatory payment of SKR HCP fees, the Project would not conflict with the SKR HCP. Other developments within the cumulative study area also would be required to contribute fees towards the SKR HCP pursuant to the implementing ordinances of Riverside County and the cities within the cumulative study area; thus, Project impacts due to a conflict with the SKR HCP would be less than significant on a cumulatively-considerable basis.

4.3.6 References

Principe and Associates. 2022a. Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis, DPR 22-00006, SPA 22-05047, TPM 22-05048; APNs 302-130-002, 302-130-008, 302-130-018, 302-130-021, 302-130-022, 302-130-023, 302-130-024, AND 302-130-027. May 12, 2022.

2022b. Nesting Season Survey Burrowing Owl, DPR 22-00006, SPA 22-05047, TPM 22-05048; APNs 302-130-002, 302-130-008, 302-130-018, 302-130-021, 302-130-022, 302-130-023, 302-130-024, AND 302-130-027. May 9, 2022.

2022c. MSHCP Narrow Endemic Plant and Criteria Area Species Focused Surveys, DPR 22-00006, SPA 22-05047, TPM 22-05048; APNs 302-130-002, 302-130-008, 302-130-018, 302-130-021, 302-130-022, 302-130-023, 302-130-024, AND 302-130-027. May 10, 2022.

U.S. Department of Fish and Wildlife (USFWS). 2017. Survey Guidelines for the Listed Large Branchiopods. Sacramento, California: USFWS. November 13, 2017. Retrieved from: <https://www.fws.gov/sites/default/files/documents/survey-guidelines-for-large-branchiopods.pdf>.

Wegscheider, Frank J. 2022. 90-Day Letter Report of Wet Season Vernal Pool Branchiopod Sampling for the OLC 3 Perris Project in Riverside County, California; Conducted Under the Endangered Species Act Section 10(A)(1)(A) Permit # TE-038716-5. September 13, 2022.

2021. 90-Day Letter Report of Dry Season Vernal Pool Branchiopod Sampling for the OLC 3 Perris Project in Riverside County, California; Conducted Under the Endangered Species Act Section 10(A)(1)(A) Permit # TE-038716-5. December 14, 2021.

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4.4 CULTURAL RESOURCES

This section evaluates the Project's potential to have adverse effects on historical, cultural, and archaeological resources. Information presented in this section is primarily based on the following referenced document, which is also listed in Section 4.4.8 References:

- *A Phase I Cultural Resources Assessment for the OLC3 Ramona Expressway and Perris Boulevard Commercial Warehouse Project*, Perris California, prepared by Jean A. Keller, Ph.D. (Cultural Resources Survey) (September 2020) (Appendix H of this EIR).

In compliance with CEQA, City of Perris Planning Division requirements, and PVCCSP EIR mitigation measure MM Cultural 1, the Project Applicant contracted with Jean A. Keller, Ph.D., Cultural Resources Consultant, to conduct a Phase I Cultural Resources Assessment of the Project site. The purpose of the assessment was to identify, evaluate impacts to, and recommend mitigation measures for existing cultural resources that may be adversely impacted by the Project.

There was one comment received on the 2023 NOP from the Native American Heritage Commission (NAHC) regarding cultural resources. Specially, the NAHC requested that consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project be conducted as early as possible to avoid inadvertent discoveries. The NAHC also requests the proposed Project complies with AB 52 and SB 18. Tribal Cultural Resources and associated input received from Native American tribes during the EIR scoping process, as well as during AB 52 consultation, is discussed in Section 4.13, *Tribal Cultural Resources*, of this Draft EIR. There were no comments addressing cultural resources raised at the July 20, 2022 Draft EIR public scoping meeting.

4.4.1 Existing Setting

4.4.1.1 Archeological Resources

Paleo Indian, Archaic Period Milling Stone Horizon, and the Late Prehistoric Takic groups are the three general cultural periods represented in Riverside County. The discussion of the cultural history of Riverside County presented in the Cultural Resources Survey (included in Appendix H of this Draft EIR) references the San Dieguito Complex, La Jolla Complex, Pauma Tradition, and San Luis Rey Complex, since these culture sequences have been used to describe archaeological manifestations in the region. The Late Prehistoric component present in the Project area was represented by the Luiseño Indians. Absolute chronological information, where possible, is incorporated in the Cultural Resources Survey to examine the effectiveness of continuing to interchangeably use these terms. Reference is made to the geological framework that divides the culture chronology of the area into four segments: the late Pleistocene (20,000 to 10,000 years before the present [YBP]), the early Holocene (10,000 to 6,650 YBP), the middle Holocene (6,650 to 3,350 YBP), and the late Holocene (3,350 to 200 YBP). Based on 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 archaeological evidence has not been fully substantiated at this time. Therefore, for the purposes of this analysis, only human occupation within the past 10,000 years will be addressed.

Prehistoric Period

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 1920s. The San Dieguito people were nomadic large-game hunters whose tool assemblage included large domed scrapers, leaf-shaped knives, and projectile points, stemmed projectile points, chipped stone crescentics, and hammerstones (Rogers 1939; Rogers 1966). The San Dieguito Tradition was further divided into three phases: San Dieguito I is found only in the desert regions, while San Dieguito II and III occur on both sides of the Peninsular Ranges. The San Dieguito Tradition is believed to have existed from approximately 7,000 to 10,000 years ago (8000 to 5000 BCE).

Throughout southwestern California the La Jolla Complex followed the San Dieguito Tradition. The La Jolla Complex is recognized primarily by the presence of millingstone (stones used for milling grains) assemblages within shell middens. The La Jolla Complex existed from 5500 to 1000 BCE. Although there are several hypotheses to account for the origins of this complex, it would appear that it was a cultural adaptation to climatic warming after c. 6000 BCE. This warming may have stimulated movements to the coast of desert peoples who then shared their millingstone technology with the older coastal groups (Moratto 1984). The La Jolla economy and tool assemblage seems to indicate such an infusion of coastal and desert traits instead of a total cultural displacement.

The Pauma Tradition 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 (Meighan 1954; True 1958; Warren 1968; True 1977). Currently, it is not known whether the Pauma Complex represents the seasonal occupation of inland sites by La Jolla 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, divided into two periods: San Luis Rey I (1400-1750 CE) and the San Luis Rey II (1750-1850 CE). 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 (Meighan 1954). Inferred San Luis Rey subsistence activities include hunting and gathering with an emphasis on acorn harvesting.

Ethnohistoric (Protohistoric) Period

Available ethnographic research indicates that the study area was included in the known territory of the 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. As far as can be determined, the Luiseño, whose language is of the Takic family (part of the Californian Uto-Aztecan linguistic stock), had no equivalent word for their nationality because they did not consider themselves to “belong to” the Spanish occupiers. The Luiseño called themselves Atáaxum, which means “people,” and traditional songs refer to the people as Payómkawichum, “people of the west.”

According to ethnographers and Luiseño oral tradition, the territory of the Luiseño was extensive, encompassing much of coastal and inland Southern California. Known territorial boundaries extended on the west to the Southern Channel Islands, to the Santa Ana River and Box Springs Mountain on the north, as far northeast as Mt. San Jacinto, to Lake Henshaw on the southeast, and to Agua Hedionda Creek on the southwest. Their habitat included every ecological zone from sea level to 6000 feet above mean 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 (Fig. 6). Except for 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.

The settlement pattern of the Luiseño was based on the establishment and occupation of sedentary autonomous village groups. Luiseño subsistence was based on seasonal floral and faunal resource procurement. Each village had specific resource procurement territories, most of which were within one day's travel of the village. The Luiseño normally hunted antelope and jackrabbits in the autumn by means of communal drives, although individual hunters also used bow and arrow to hunt jackrabbits throughout the year.

Tools for food acquisition, preparation, and storage were made from widely available materials. Hunting was done with a bow and fire-hardened or stone-tipped arrows. Coiled and twined baskets were used in food gathering, preparation, serving, and storage. Seeds were ground with handstones on shallow granitic mutates, while stone mortars and pestles were used to pound acorns, nuts, and berries. Food was cooked in clay vessels over fireplaces or earthen ovens. The Luiseño employed a wide variety of other utensils produced from locally available geological, floral, and faunal resources in all phases of food acquisition and preparation.

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. Temporary campsites, usually evidenced by lithic debris and/or milling features, may be expected to occur relatively frequently. Food processing stations, often only single milling features, are the most abundant type of site found. Isolated artifacts occur with approximately the same frequency as food processing stations. The most infrequently occurring archaeological site is the village site. Sites of this type are usually large, in defensive locations amidst abundant natural resources, and usually surrounded by the types of sites previously discussed, which reflect the daily activity of the villagers. Little is known of ceremonial sites, although the ceremonies themselves are discussed frequently in ethnographic literature. It may be assumed that such sites would be found in association with village sites, but with what frequency is not known.

4.4.1.2 Historical Resources

Four principal periods of historical occupation existed in Southern California: the Protohistoric Period (1540-1768 CE), the Spanish Mission Period (1769-1830 CE), the Mexican Rancho Period (1830-1848 CE), and the American Developmental Period (1848 CE - present).

The Spanish Mission Period

In the general study area, the Spanish Mission Period (1769-1830 CE) first represents historical occupation. Although earlier European explorers had traveled throughout South California, it was not until the 1769 “Sacred Expedition” of Captain Gaspar de Portola and Franciscan Father Junipero Serra that there was actual contact with aboriginal inhabitants of the region. The intent of the expedition, which began in San Blas, Baja California, was to establish missions and presidios along the California coast, thereby serving the dual purpose of converting Indians to Christianity and expanding Spain’s military presence in the “New World.” In addition, each mission became a commercial enterprise utilizing Indian labor to produce commodities such as wheat, hides, and tallow that could be exported to Spain. Founded on July 16, 1769, the Mission San Diego de Alcalá was the first of the missions, while the Mission San Francisco Solana was the last mission, founded on July 4, 1823.

In 1798, 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. Within a 20-year period, under the guidance of Fr. Antonio Peyri, the mission prospered to a degree that it was often referred to as the “King of the Missions”. At its peak, the Mission San Luis Rey de Francia, which is in what is now Oceanside, controlled six ranches and annually produced 27,000 cattle, 26,000 sheep, 1300 goats, 500 pigs, 1900 horses, and 67,000 bushels of grain. During this period, the Mission San Luis Rey de Francia claimed the entire region that is now western Riverside County and northern San Diego County as a cattle ranch, although records of the Mission San Juan Capistrano show this region as part of their holdings. By 1818, the greater Temecula Valley had become the Mission San Luis Rey’s principal producer of grain and was considered one of the mission’s most important holdings. It was at approximately this time that a granary, chapel, and majordomo’s home were built in Temecula. These were the first structures built by whites within the boundaries of Riverside County (Hudson 1981:19). 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.

The Mexican Ranchero Period

During the Mexican Rancho Period (1830-1848 CE) 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” (Robinson 1948:66). 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 (ibid). The subject property was included in the San Jacinto Nuevo y Potrero land grant.

It was also during this historical period that the central event of California history—the Gold Rush—occurred. Although gold had been discovered as early as 1842 in the Sierra Pelona north of Los Angeles, it cost more to extract and process the gold than it was worth. The second discovery of gold in 1848 at Sutter’s Mill by James Marshall was serendipitously coincidental with California’s change in ownership as the result of the Anglo-American victory in the Mexican War, occurring at a time when many adventurers had come to California in the vanguard of military conquest. The discovery of gold and the riches it promised caused California to become a magnet that attracted Anglo-American exploration and colonization. It has been estimated that the Anglo-American population of California at the beginning of

1848 was 2000 and that by the end of 1849 it had exploded to over 53,000 (Farquhar 1965). California's population grew to 380,000 by 1860 and to 560,000 by 1870, not including the Native Americans, whose populations were decimated by the Anglo-American invasion. Conversely, in 1846 the Native American population in California is estimated to have been at least 120,000 and by the 1860s, only 20,000-40,000 had survived. This period of history is often referred to as the "California Indian Genocide."

Throughout the 1840s and 1850s, thousands of settlers and prospectors traveled through the study area on the Emigrant Trail in route to various destinations in the West. The southern portion of the trail ran from the Colorado River to Warner's Ranch and then westward to Aguanga, where it split into two roads. The main road continued westward past Aguanga and into the valley north of the Santa Ana Mountains. This road was alternately called Colorado Road, Old Temescal Road, or Fort Yuma Road and what is now SR 79 generally follows its alignment. The second road, known as the San Bernardino Road, split off northward from Aguanga and ran along the base of the San Jacinto Mountains.

The American Developmental Period

In the final period of historical occupation, the American Developmental Period (1848 CE-present), the first major changes in the study area took place because 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 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) who were either the head-of-household or a single person over the age of 21 (including women). Once the homestead claim was filed the applicant had six months to move onto the land and was required to maintain residency for five years as well as to build a dwelling and raise crops. Upon completion of these requirements the homesteader had to publish intent to close on the property to allow others to dispute the claim. If no one did so the homesteader was issued a patent to the property, thus conveying ownership. Individuals were attracted to the federal lands by their low prices and as a result, the population began to increase in regions where the lands available for homestead were located. It was at this time that the region of Southern California which became Riverside County saw an influx of settlers as well as those seeking other opportunities, including gold mining. As Anglo-Americans came to this region in increasing numbers, the continued existence of Native Americans in the area was threatened as their traditional lands were taken from them.

On March 17, 1882, the California Southern Railroad commenced service, extending from National City near the Mexican border in San Diego County, northerly to Temecula and Murrieta, across the Perris Valley, down the Box Springs Grade, and on to the City of San Bernardino. Under the supervision of chief engineer Frederick Thomas Perris, the railway had been completed through the Perris Valley early in 1882 and settlers rushed to the region to homestead and buy railroad land. The original rail station in this area was the town of Pinacate, located approximately two miles south of the present city of Perris. While still part of San Diego County, Rancho San Jacinto Nuevo y Portrero was patented to T.W. Sutherland, guardian of Miguel Pedorena's children, in 1883. In 1885, the citizens of Pinacate gathered to create a more conveniently located station along the railroad route, and in 1886 the town site of Perris was established.

In Early 1911, residents of the then-unincorporated town site of Perris submitted a petition to Riverside County supervisors seeking incorporation. On April 18, 1911, the community voted on the petition; 101 votes were cast with a majority for cityhood. On May 26, 1911, Perris became an officially incorporated city. The best guess of the City population at incorporation was approximately 300 people. By 1920, when the next U.S. Census took place, the City of Perris had grown to 499 residents.

Since 1918, the greatest influence on the Perris region has been March Air Force Base/Inland Port Airport, whose southeastern corner is located approximately one-half-mile northwest of DPR 22-00006. In addition, a U.S. Military Reserve (Gregory Radio Range Station) is less than one-quarter mile northwest. At the time, the United States was rushing to build up its military forces in anticipation of an entry into World War I. 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.

4.4.1.3 Methods and Procedures

Prior to commencement of the Phase I Cultural Resources Assessment field survey, a request to conduct a records search was submitted to staff at the Eastern Information Center located at the University of California, Riverside on October 20, 2021. The requested research included a review of all site maps, site records, survey reports, and mitigation reports relevant to the study area. The following documents were also to be reviewed: the National Register of Historic Places (NRHP), the California Office of Historic Preservation (OHP) Archaeological Determinations of Eligibility, and the California Office of Historic Preservation Historic Property Directory. The results of the records search were received on November 16, 2021. In addition to the records search, a request for a Sacred Lands File search was submitted to the NAHC on October 20, 2021, with results received on December 8, 2021. On December 13, 2021, project scoping letters were sent to 17 tribal representatives listed by the NAHC as being interested in project development in the Perris area.

Following the records and Sacred Lands File search requests, a literature search of available published references to the study area was undertaken. Reference material included all available photographs, maps, books, journals, historical newspapers, registers, and directories held in various repositories. Archival and cartographic research was conducted through the USGS Historical Map Collection, the General Land Office records currently maintained by the California Office of the Bureau of Land Management, and documents containing census and other information held by Ancestry.com. Advanced property-specific research regarding ownership, land use, and valuation from 1892 to 1932 was conducted through the Riverside County Archives.

After the literature, archival, and cartographic research, Jean Keller conducted a comprehensive pedestrian field survey of the subject property on November 20, 2021. The field survey was accomplished by traversing the subject property, beginning at the southwestern property corner, in parallel transects at 15-meter intervals. The survey proceeded in a generally east-west, west-east direction following the existing land contours. All of the property was accessible for survey except for areas covered by refuse that has been dumped throughout the subject property, particularly in and around the earthen reservoir. The property had recently been disced for the purpose of vegetation clearance, although in most areas, the vegetation had been left on the ground, impairing surface visibility. Most of the subject property had essentially 100 percent ground surface visibility, with visibility in areas covered by remnant vegetation being 50 percent, resulting in an overall average ground surface visibility of approximately 75 percent.

4.4.1.4 Results of Records Search and Site Survey

Records Search

Results of the records search conducted by staff at the Eastern Information Center, received on November 16, 2021, indicated that the subject property had been included in three previous cultural resources studies. The three studies found no archaeological sites of prehistoric (Native American) origin were recorded within the property boundaries during this study. However, a site of potentially historical origin was recorded within the property boundaries immediately adjacent to N. Perris Boulevard. The site, assigned Primary No. P-33-008699, was described as an earthen reservoir and adjoining square concrete standpipe of indeterminate age. Since the features of the site were considered typical of those found in agricultural fields throughout Riverside County and showed no characteristics that would indicate any kind of uniqueness or importance in regional history, the features of this were recorded and discussed in the reports only as an object of passing interest and not regarded as a potential historic property (CRM TECH 1999:12).

The subject property is in a very well-studied area with 51 previous cultural resources studies having been conducted, many of which included large acreages. During field surveys for these studies, 14 cultural resources properties have been recorded. With only one exception, all recorded sites represent early-to-mid 20th century resources. Table 4.4-1, *Previously Recorded Cultural Resources in the Scope of the Records Search*, lists the primary numbers and trinomials for each site, the recorded cultural resources, and the distance of the site from the Project.

Table 4.4-1
PREVIOUSLY RECORDED CULTURAL RESOURCES IN THE SCOPE OF THE RECORDS SEARCH

Primary Numbers (Trinomials)	Description of Recorded Cultural Resources	Distance from Project Site (miles)
P-33-005775 (CA-RIV-5516H)	Well No. 6 (cube-shaped well house), drilled in 1941 as part of the Gregory Radio Range complex associated with March Army Airfield.	0.25 – 0.50
P-33-007674	1911 Val Verde Elementary School (24040 Ramona Expressway) Vernacular Mediterranean/Spanish Revival building, plus wood frame house and garage. <i>Demolished by 1999</i>	0.75 – 1.00
P-33-008699	Earthen reservoir and square concrete standpipe (age unknown) *** <i>Located within DPR 22-00006</i>	0.00 – 0.25
P-33-014109 (CA-RIV-7744)	Perris Indian School	0.25 – 0.50
P-33-014136 (CA-RIV-7758)	1 metate fragment, 1 mano, 1 crescent, 16 flakes, 6 kg fire-affected rock (<i>Phase II Testing 2012</i>)	0.50 – 0.75
P-33-015853 (CA-RIV-8222)	10 features representing the remains of structures and an agricultural irrigation system, ca. 1943-1953	0.75 – 1.00
P-33-015854	Concrete standpipe and fragments of the remains of a well, ca. 1953	0.75 – 1.00
P-33-016078 (CA-RIV-8312)	Remnants of historic water conveyance system (concrete reservoir inscribed 1950, electric pump, concrete pad for parking)	0.25 – 0.50
P-33-016238 (CA-RIV-8389)	Several pieces of historic farming equipment	0.75 – 1.00
P-33-019865 (CA-RIV-10111)	Remnants of historic homestead and water conveyance system (metal-lined water well, concrete pad, standpipe, power pole, 8 large pepper trees, and earthen berm, concrete tank supports, wooden garage door)	0.00 – 0.25

Primary Numbers (Trinomials)	Description of Recorded Cultural Resources	Distance from Project Site (miles)
P-33-020334 (CA-RIV-10260)	Group of irrigation features that date to sometime post-1913 (well, pump base, small concrete pad, metal pipes)	0.75 – 1.00
P-33-028621 (CA-RIV-12883)	Small concrete slab for a well with galvanized spigot, ca. 1953	0.25 – 0.50
P-33-028896	Small concrete irrigation feature	0.75 – 1.00
P-33-029118 (CA-RIV-13010)	Perris Valley Storm Drain	0.75 – 1.00

The literature search offered no information specific to the subject property. The subject property was included in Block 12, Lots 2, 3, 4, 5 (N ½), 6 (N ½), and 7 of the Riverside Tract. Property ownership records for the subject property are available from the Riverside County Archives for 1892-1932, but later records are currently being scanned and undergoing conservation, so are not available. While the available records do not give a comprehensive history of the property, they do offer interesting insight into the early years of the property.

Cartographic research indicates that from 1897-1898 (years of survey for the 1901 USGS Elsinore topographic map) and 2016 (year of aerial photos used for the 2018 USGS Perris Topographic map) no buildings existed within the boundaries of the subject property, although a reservoir appears on the 1942 USACOE Perris topographical map that was based on photographs taken by the U.S. Army Air Force in 1939 (Fig. 13). As early as 1897-1898, virtually all currently existing roads were in place, having been developed by the Perris Land Company for the Riverside Tract in 1891. Between 1898 and 1987, the improvement status of the individual roads in the vicinity of the property changed, but the general configuration remained the same until the time when Martin Street became Ramona Expressway in 2007 and Oleander Avenue became Harley Knox Boulevard in 2009.

Field Survey

No cultural resources of prehistoric (Native American) origin were observed within the boundaries of the Project site during the current field survey. No bedrock outcrops exist within the property boundaries and loose lithic material is very sparse. While an abundance of debris has been scattered throughout the property, all that observed was of contemporary origin. No indications of a possible subsurface cultural deposit were evidenced.

During a 1999 archaeological study of the subject property, an earthen reservoir and associated square concrete standpipe were observed and recorded within the property boundaries; primary number P-33-008677 was assigned to this site by the Eastern Information Center. The 1999 study could not determine whether the features were at least 50 years of age, so the site was not recorded as an archaeological site. The site was not deemed significant according to CEQA criteria and no further research was recommended.

The current field survey relocated the previously recorded P-33-008699 features, as well as an additional cylindrical concrete standpipe (Fig. 14). Only the existence of these features was recorded in 1999, with no specific information provided regarding their dimensions, condition, method of construction, etc. Consequently, during the current field survey, all these issues were addressed, with each feature measured, mapped, photographed, described, and evaluated pursuant to CEQA criteria for significance. None of these features were deemed historically significant.

4.4.2 Existing Policies and Regulations

4.4.2.1 Federal

Numerous federal laws and regulations protect cultural resources and Native American concerns for such resources. With a few exceptions, many State of California laws and regulations that apply to cultural resources mirror the federal statutes. The National Historic Preservation Act (NHPA) of 1966 set forth national policy for recognizing and protecting historic properties. The NHPA established the National Register of Historic Places, the concept of State Historic Preservation Officers and programs, and the Advisory Council on Historic Preservation (ACHP). Under Section 106 of the NHPA, federal agencies are required to consider the effects of their undertakings on historic properties and provide the ACHP an opportunity to comment on those undertakings. Historic properties are defined in federal law as those properties that are listed in or meet the criteria for listing in the National Register of Historic Places. Criteria have been established to allow the professional to determine whether the resource is eligible.

National Historic Preservation Act of 1966 (as amended), Section 106

The National Historic Preservation Act (NHPA) declares a national policy of historic preservation to protect, rehabilitate, restore, and reuse districts, sites, buildings, structures, and objects significant in American architecture, history, archaeology, and culture. The NHPA established the NRHP, State Historic Preservation Offices (SHPOs) and programs, and the Advisory Council on Historic Preservation. This Act applies to all properties on or eligible for inclusion in the NRHP. The Section 106 review process requires consultation to mitigate damage to “historic properties”, as defined per the Code of Federal Regulations (CFR, Title 36, Section 800.16[1]), including Native American traditional cultural places (TCPs). Evaluation of cultural resources consists of determining whether it is significant (i.e., whether it meets 1 or more of the criteria for listing in the NRHP).

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA; Public Law 101-601; 25 U.S.C. 3001-3013) describes the rights of Native American lineal descendants, Indian tribes, and Native Hawaiian organizations with respect to the treatment, repatriation, and disposition of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony, referred to collectively in the statute as cultural items, with which they can show a relationship of lineal descent or cultural affiliation (NPS 2016).

One major purpose of this statute is to require that federal agencies and museums receiving Federal funds inventory holdings of Native American human remains and funerary objects and provide written summaries of other cultural items. The agencies and museums must consult with Indian Tribes and Native Hawaiian organizations to attempt to reach agreements on the repatriation or other disposition of these remains and objects. Once lineal descent or cultural affiliation has been established, and in some cases the right of possession also has been demonstrated, lineal descendants, affiliated Indian Tribes, or affiliated Native Hawaiian organizations normally make the final determination about the disposition of cultural items. Disposition may take many forms from reburial to long term curation, according to the wishes of the lineal descendent(s) or culturally affiliated Tribe(s) (NPS 2016).

The second major purpose of the statute is to provide greater protection for Native American burial sites and more careful control over the removal of Native American human remains, funerary objects,

sacred objects, and items of cultural patrimony on Federal and tribal lands. NAGPRA requires that Indian tribes or Native Hawaiian organizations be consulted whenever archeological investigations encounter, or are expected to encounter, Native American cultural items or when such items are unexpectedly discovered on Federal or tribal lands. Excavation or removal of any such items also must be done under procedures required by the Archaeological Resources Protection Act. This NAGPRA requirement is likely to encourage the in-situ preservation of archaeological sites, or at least the portions of them that contain burials or other kinds of cultural items (NPS 2016).

Other provisions of NAGPRA: (1) stipulate that illegal trafficking in human remains and cultural items may result in criminal penalties; (2) authorize the Secretary of the Interior to administer a grants program to assist museums and Indian Tribes in complying with certain requirements of the statute; (3) require the Secretary of the Interior to establish a Review Committee to provide advice and assistance in carrying out key provisions of the statute; (4) authorize the Secretary of the Interior to penalize museums that fail to comply with the statute; and, (5) direct the Secretary to develop regulations in consultation with this Review Committee (NPS 2016).

Façade Easement Donation

A charitable tax deduction for donating a façade easement to a nonprofit or publicly supported organization is available to owners of buildings listed in the NRHP. In exchange for a charitable deduction on Federal income taxes, the property owner authorizes the non-profit organization to review exterior alteration to the building. The non-profit entity thereby assumes responsibility for protecting the historic and architectural integrity of the property. Facade easements are recorded on the property deed in perpetuity.

Antiquities Act of 1906

The only federal law protecting fossil resources on public lands is the Antiquities Act of 1906 (16 United States Code [USC] 431-433). Enacted when Theodore Roosevelt was president, the Antiquities Act was designed to protect nonrenewable fossil and cultural resources from indiscriminate collecting. Specific paleontological sites can be protected under the National Registry of Natural Landmarks (16 USC 461-467), and at least three paleontological Landmarks are known in California. NEPA (42 USC 4321) directs Federal agencies to use all practicable means to "...preserve important historic, cultural, and natural aspects of our national heritage...". It must be noted that Section 106 of the NHPA does not apply to paleontological resources unless they are found in culturally related contexts.

Historic Rehabilitation Tax Credit

A tax credit equal to 20 percent of the cost of rehabilitation is available to use on properties listed in or determined eligible for the NRHP or a property that contributes to a certified, locally designated district. It can only be used on income-producing properties (e.g., offices, commercial, industrial, or agricultural enterprises, rental housing) where rehabilitation is substantial. The property cannot serve exclusively as the owner's private residence. A tax act project requires certification by the National Park Service that the work complies with the Secretary of the Interior's Standards for Rehabilitation.

4.4.2.2 State

The California Register of Historic Resources (Public Resources Code Section 5020 et seq.)

State law also protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources in CEQA documents. A cultural resource is an important historical resource if it meets any of the criteria found in Section 15064.5(a) of the State *CEQA Guidelines*. These criteria are nearly identical to those for the NRHP.

The California Register of Historical Resources (CRHR) includes historic resources of importance in accordance with the following designation criteria:

- associated with events that have made a significant contribution to the broad pattern of local or regional history or the cultural heritage of California or the United States.
- associated with the lives of people important to local, California or national history.
- embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master or possess high artistic values.
- has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or nation.

All properties listed in the NRHP are automatically included in the CRHR.

The State Office of Historic Preservation (OHP) maintains the CRHR. Properties listed, or formally designated eligible for listing, on the NRHP are nominated to the CRHR and then selected to be listed on the CRHR, as are State Landmarks and Points of Interest.

California Health and Safety Code (Sections 7050.5, 7051, and 8010-8011)

California Health and Safety Code (HSC) Section 7050.5(b) requires that excavation and disturbance activities must cease “In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery...” until the coroner can determine regarding the circumstances, manner, and cause of any death. The coroner is then required to make recommendations concerning the treatment and disposition of the human remains. Further, this section of the code makes it a misdemeanor to intentionally disturb, mutilate or remove interred human remains. Section 7051 specifies that the removal of human remains from “internment or a place of storage while awaiting internment” with the intent to sell them or to dissect them with “malice or wantonness” is a public offense punishable by imprisonment in a state prison. Lastly, HSC Section 8010-8011 establish the California Native American Graves Protection and Repatriation Act consistent with the federal law addressing the same. The Act stresses that “all California Indian human remains, and cultural items are to be treated with dignity and respect.” It encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California. It also outlines the need for aiding California Indian tribes, including non-federally recognized tribes, in filing repatriation claims.

California Public Resources Code Section 5097.98

California Public Resources Code Section 5097.98 addresses the disposition of Native American burials in archeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains. It has been incorporated into Section 15064.5(e) of the State CEQA Guidelines.

California Public Resources Code Section 5097.5

California Public Resources Code Section 5097.5 protects, among other things, paleontological sites on State Lands. Sections 4306 and 4309 of the California Administrative Code establish authority and processes to protect paleontological resources while allowing mitigation through the permit process. Potential impacts to paleontological resources must be assessed for any project subject to review under CEQA.

Senate Bill 18, California Tribal Consultation Guidelines

Senate Bill 18 (SB 18) requires local (city and county) governments to consult with California Native American tribes to aid in the protection of traditional tribal cultural places (“cultural places”) through local land use planning. SB 18 also requires the Governor’s Office of Planning and Research (OPR) to include in the General Plan Guidelines advice to local governments for how to conduct these consultations.

The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level land use decisions are made by a local government.

SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of both general plans (defined in Government Code Section 65300 et seq.) and specific plans (defined in Government Code Section 65450 et seq.). Although SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, existing state planning law requires local governments to use the same processes for adoption and amendment of specific plans as for general plans (see Government Code Section 65453). Therefore, where SB 18 requires consultation and/or notice for a general plan adoption or amendment, the requirement extends also to a specific plan adoption or amendment. SB 18 is applicable to the Project due to the need to amend the PVCCSP to allow for the development of Light Industrial uses on the Project site, which is currently designated for Commercial uses.

4.4.2.3 Local

City of Perris General Plan Conservation Element

The following implementation measures are identified in the City of Perris General Plan Conservation Element and would be applicable to the Project:

Implementation Measures

- 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.

4.4.2.4 Applicable PVCCSP Standards, Guidelines, and Mitigation Measures

There are no Standards and Guidelines included in the PVCCSP related to cultural resources. The Cultural Resources Survey (Appendix H) was prepared for the Project in compliance with the following applicable PVCCSP EIR mitigation measure:

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 archeologist¹ 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, archeological, 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 Native American Heritage Commission (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 shall also 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 potentially 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 For the purpose of this measure, the City of Perris considers professional archaeologists to be those who meet the United States Secretary of the Interior's standards for recognition as a professional, including an advanced degree in anthropology, archaeology, or a related field, and the local experience necessary to evaluate the specific project. The professional archaeologist must also meet the minimum criteria for recognition by the Register for Professional Archaeologists (RPA), although membership is not required.

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 and discovered 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 years prior to the submittal of the application for the subject implementing development project or the start of construction of an implementing infrastructure project.

The following PVCCSP EIR mitigation measures are applicable to the Project:

MM Cultural 2 If the Phase I Cultural Resources Study required under MM Cultural 1 determines that monitoring during construction by a professional archaeologist is needed for the implementing development project, the project proponent shall retain a professional archaeologist prior to the issuance of grading permits. The task of the archaeologist shall be to verify implementation of the mitigation measures identified in the approved Phase I Cultural Resources Study and to monitor the initial ground- altering activities² at the subject site for the unearthing of previously unknown archaeological and/or cultural resources. Selection of the archaeologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the site until the archaeologist has been approved by the City.

The archaeological monitor shall be responsible for maintaining daily field notes, a photographic record, and reporting all finds in a timely manner. The archaeologist shall also be equipped to record and salvage cultural resources that may be unearthed during initial ground-altering activities. The archaeologist shall be empowered to temporarily halt or divert construction equipment to allow recording and removal of the unearthed resources.

Depending on the nature of the artifacts, the handling will differ. However, it is understood that all artifacts except for human remains, and related grave goods or sacred objects belong to the property owner. All artifacts discovered at the

² For the purpose of this measure, ground-altering activities include, but are not limited to, debris removal, vegetation removal, tree removal, grading, trenching, or other site preparation activities. Initial ground-altering activities refer to the first time that the existing materials are altered by construction-related activities. Materials that have already been disturbed by construction-related activities do not require subsequent monitoring.

development site shall be inventoried and analyzed by the professional archaeologist. If any artifacts of Native American origin are discovered, a Native American observer of Luiseno descent shall be asked to help analyze the Native American artifacts for identification as everyday life and/or religious or sacred items, cultural affiliation, temporal placement, and function, as deemed possible. All items found in association with Native American human remains will be considered grave goods or sacred in origin and subject to special handling (see MM Cultural 4, below). The remainder of the Native American artifact assemblage will be prepared in a manner for curation and the archaeological consultant will deliver the materials to an accredited curation facility approved by the City of Perris within a reasonable amount of time.

Non-Native American artifacts will be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. After analysis and reporting, these artifacts will be subjected to curation or returned to the property owner, as deemed appropriate.

Once ground-altering activities have ceased or the professional archaeologist determines that monitoring activities are no longer necessary, monitoring activities may be discontinued following notification to the City of Perris Planning Division. A report of findings, including an itemized inventory of recovered artifacts, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered artifacts. The report and inventory, when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to archaeological and/or cultural resources.

MM Cultural 3 If the Phase I Cultural Resources Study required under MM Cultural 1 determines that monitoring during construction by both a professional archaeologist and a Native American representative is needed for the implementing development project, the project proponent shall retain a professional archaeologist and a Native American representative of Luiseño descent prior to the issuance of grading permits. The professional archaeologist and Native American observer shall be required on site during all initial ground- altering activities. The Native American observer shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow the evaluation of cultural resources with the project archaeologist. The evaluation and treatment provisions of mitigation measure MM Cultural 2 shall apply to this measure.

MM Cultural 6 In the event that human remains (or remains that may be human) are discovered at the implementing development project site during grading or earthmoving, the construction contractors shall immediately stop all activities in the immediate area of the find. The project proponent shall then inform the City of Perris Planning Division immediately and retain a professional archaeologist to assess the find. In accordance with the California Health and Safety Code, the City of Perris will contact the County Coroner's office within 24 hours and the coroner will be permitted to examine the remains.

If the coroner determines that the remains are of Native American origin, the coroner will report to the NAHC and the Commission will identify the "Most Likely Descendent" (MLD).³ Despite the affiliation of any Native American observers at the site, the Commission's identification of the MLD will stand. The disposition of the remains will be determined in consultation with the City of Perris, the project proponent, and the MLD. The City of Perris will be responsible for the final decision, based upon input from the various stakeholders.

If the human remains are determined to be other than Native American in origin, but still of archaeological value, the remains will be recovered for analysis and subject to curation or reburial at the expense of the project proponent. If deemed appropriate, the remains will be recovered by the coroner and handled through the Coroner's Office.

Coordination with the Coroner's Office will be through the City of Perris and in consultation with the various stakeholders.

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

4.4.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on cultural resources if the project would:

- a) Cause a substantial adverse change in the significance of historical resources pursuant to Section 15064.5;
- b) Cause a substantial adverse change in the significance of archaeological resources pursuant to Section 15064.5; or
- c) Disturb any human remains, including those interred outside of formal cemeteries.

³ The "Most Likely Descendent" ("MLD") is a reference used by the California Native American Heritage Commission to identify the individual or population most likely associated with any human remains that may be identified within a given project area. Under California Public Resources Code section 5097.98, the Native American Heritage Commission has the authority to name the MLD for any specific project and this identification is based on a report of Native American remains through the County Coroner's office. In the case of the City of Perris, the Native American Heritage Commission may identify any Luiseno descendent, but generally names the Soboba or Pechanga bands of Mission Indians (both Luiseno populations) and alternates between the two groups. The City of Perris will recognize any MLD identified by the Native American Heritage Commission without giving preference to any particular population. In cases where the Native American Heritage Commission is not tasked with the identification of a Native American representative, the City of Perris reserves the right to make an independent decision based upon the nature of the proposed project.

4.4.4 Environmental Impacts

Threshold a: Would the Project cause a substantial adverse change in the significance of historical resources pursuant to Section 15064.5?

Impact Analysis

Evaluations for site significance are typically made with respect to eligibility criteria for nomination to the National Register of Historic Places. Since this measure of significance has come to be the determining factor in whether a particular site warrants consideration by the federal government in federally funded projects, state and local governments often use it to assess sites as well. The State of California has established its own criteria, as set forth in CEQA and since this is the principal statute utilized by the City of Perris in processing the proposed Project, historical site P-33-008699, located at the western property boundary, would be addressed accordingly.

According to the Regulations for California Register of Historical Resources formally adopted by the State Historical Resources Commission on January 1, 1998, an historical resource must be significant at the local, state, or national level under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory of the local area, California, or the nation.

Based on the eligibility criteria described above, it is apparent that historical site P-33-008699 would not be deemed a significant historical resource eligible for listing on the California Register as it does not meet any of the stipulated eligibility criteria. The site would not qualify for significance under Criterion 1 in that it was not associated with events that made a significant contribution to history or the cultural heritage of California or the United States. While reservoirs and irrigation features such as those of site P-33-008699 were clearly important components in early early-to-mid 20th century agricultural endeavors in the Perris Valley, they were not associated with any event that made a significant contribution to either local or national history or cultural heritage. Rather, they were simply part of the general agricultural landscape.

The reservoir and irrigation system components of site P-33-008699 would not be considered a significant historical resource, according to CEQA criteria. However, it is possible that information can be gleaned regarding construction and use of the reservoir. Therefore, Project-specific mitigation measure, MM CUL-1, is recommended to require a controlled grading program for the earthen reservoir.

Mitigation Measures

Project-Specific MM CUL-1: Prior to the issuance of grading permits, the Project Applicant 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) to create and implement a Project-specific controlled grading plan for monitoring site grading/earthmoving activities in the vicinity of the earthen reservoir. 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 Project site or within the off-site Project improvement areas until the archaeologist has been approved by the City.

A report of findings, including an itemized inventory of artifacts, shall be prepared upon completion of the grading of the earthen reservoir. 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, and the Eastern Information Center (EIC).

Level of Significance After Mitigation

Project impacts would be less than significant with the incorporation of Project-specific mitigation measure MM CUL-1.

Threshold b: Would the Project cause a substantial adverse in the significance of archaeological resources pursuant to Section 15064.5?

Impact Analysis

The subject property is in a very well-studied area with 51 previous cultural resources studies having been conducted within a one-mile radius, many of which included large acreages. During field surveys for these studies, 14 cultural resource properties have been recorded, one of which involved the subject property. With only one exception, all recorded sites represent early-to-mid 20th century resources, primarily remnant agricultural irrigation system components. The sole prehistoric (Native American) site, located approximately one-half mile from the Project site, is comprised of a small lithic scatter and fire-affected rock.

The NAHC determined that the Sacred Lands File search results were negative. The sole response to project scoping letters was received from the Rincon Band of Luiseño Indians. After a review of the provided documents and their internal documents, the Band determined that Tribal Cultural Resources (TCRs) and/or Traditional Cultural Properties (TCPs) have been recorded within or surrounding the project area. Therefore, the Band recommended that an archaeological records search be conducted and asked that a copy of the results and the final cultural resources study be forwarded to them upon completion. The City of Perris will comply with this request as part of the AB 52 consultation process.

Given that major ground disturbing activities associated with the Project would be focused within the extensively impacted area and that no archaeological sites, features, or artifacts were identified within the Project area during the survey, no impacts to known or recorded cultural resources are anticipated with the proposed development of the Project. Further, because of previous ground-disturbing activities associated with the historical agricultural uses of the Project area, there is minimal to nil potential for archaeological resources to be present or disturbed by the proposed development.

Considering the above discussion, it is clear that the subject property is situated in an area with very low prehistoric sensitivity, moderate historical sensitivity, and low probability of a significant subsurface cultural deposit existing. However, there is a possibility that archaeological resources may be present beneath the site's subsurface and may be impacted by deeper ground-disturbing activities associated with Project construction. Therefore, Project-Specific mitigation measure MM CUL-2 is required to reduce potential impacts to unanticipated archaeological resources to less than significant levels. Mitigation measure MM CUL-2 implements PVCCSP EIR mitigation measures MM Cultural 2 through MM Cultural 4 as subsequently revised by the City of Perris.

Mitigation Measures

Project-Specific MM CUL-2: Prior to the issuance of grading permits, the Project Applicant 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.

If 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, except for human remains and related grave goods or sacred/ceremonial/religious objects, belong to the property owner. The property owner shall 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, the Soboba Band of Luiseño Indians, the Pechanga Band of Luiseño Indians, and the Rincon Band of Luiseño Indians. A designated Native American representative from either the Soboba Band of Luiseño Indians, the Pechanga Band of Luiseño Indians, or the Rincon Band of Luiseño Indians shall be retained to assist the Project archaeologist in the significance determination of the Native American resources as deemed possible. The designated 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 tribe.

If the find is determined to be of sacred or religious value, the tribal representative will work with the City and consulting archaeologist to protect the resource in accordance with tribal requirements. All analysis will be undertaken in a manner that avoids destruction or other adverse impacts.

If human remains are discovered at the Project site or within the off-site Project improvement areas, mitigation measure MM CUL-3 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 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 cannot be avoided or relocated at the Project site shall be prepared for curation at an accredited curation facility in Riverside County that meets federal standards (per 36 CFR Part 79) and available to archaeologists/researchers for further study. The Project archaeologist shall deliver the Native American artifacts, including title, to the identified curation facility within a reasonable amount of time, along with applicable fees for permanent curation. Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. After 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 tribe(s) involved with the Project.

Level of Significance After Mitigation

Project impacts would be less than significant with the incorporation of Project-specific mitigation measure MM CUL-2.

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

Impact Analysis

As identified in the Initial Study for the PVCCSP EIR, the PVCCSP area “has been historically used for agriculture use and therefore, is not expected to contain human remains, including those interred outside of formal cemeteries.” Due to the lack of any indication of a formal cemetery or informal family burial plots on site, the Project would have no impact on known human remains.” 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 (Project-specific mitigation measure MM CUL-3).

Mitigation Measures

Project-Specific MM CUL-3: If 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(s) shall immediately stop all activities within 100 feet of the find. The Project Applicant 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 of any Luiseño tribal representative(s) at the site, the NAHC identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of the Native American human remains and may recommend to the Project Applicant 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 Applicant and the MLD. If there is disagreement regarding the disposition of the remains, State law will apply and median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

The specific locations of Native American burials and reburials would be proprietary and not disclosed to the public. The locations would be documented by the consulting archaeologist in conjunction with the various stakeholders and a report of findings shall be filed with the Eastern Information Center (EIC).

Level of Significance After Mitigation

Project impacts would be less than significant with the incorporation of Project-specific mitigation measure MM CUL-3.

4.4.5 Cumulative Impacts

The potential for implementation of the Project to contribute to cumulative impacts to historical resources was analyzed in conjunction with other projects located in areas that were once similarly influenced by the historical agricultural industry of the City of Perris and the region. The potential for Project construction to result in cumulatively considerable impacts to prehistoric archaeological resources were also analyzed in conjunction with other projects located in the traditional use areas of Native American tribes that are affiliated to the Project site. Development activities on the Project site would not impact any known prehistoric archaeological resources and the likelihood of uncovering previously unknown prehistoric archaeological resources during Project construction are moderate to low due to the magnitude of disturbance that has occurred on the site due to historic agricultural activities.

Nonetheless, the potential exists for subsurface prehistoric archaeological resource that meet the CCR §15064.5 definition of a significant archaeological resource to be discovered on the Project site—and other development project sites in the region—during construction activities. Accordingly, the Project has the potential to contribute to a significant cumulative impact to prehistoric archaeological sites and/or resources. Therefore, the Project could result in a cumulatively considerable impact to prehistoric archaeological resources for which mitigation is required. Project-specific mitigation measure MM CUL-1 would be implemented to reduce impacts to a less than significant level by requiring a controlled grading program for the earthen reservoir. In the event that archeological resources and/or human remains are discovered, Project-specific mitigation measure MM CUL-2 and MM CUL-3 would be implemented to reduce impacts to unanticipated discoveries to a less than significant level.

Mandatory compliance with the provisions of California Health and Safety Code §7050.5 as well as Public Resources Code §5097 et seq., would assure that all future development projects within the region treat human remains that may be uncovered during development activities in accordance with prescribed, respectful, and appropriate practices, thereby avoiding significant cumulative impacts.

4.4.6 References

Albert A. Webb Associates. 2011. Perris Valley Commerce Center Specific Plan Final Environmental Impact Report. November 2011, certified January 10, 2012.

Keller, Jean A. 2022. Phase 1 Cultural Resource Assessment for the OLC3 Ramona Expressway and Perris Boulevard Commercial Warehouse Project. March. Revised June 2022.

4.5 ENERGY

This section provides a Project-specific energy analysis, consistent with the requirements of the PVCCSP EIR. The analysis contained in this section is based on the Project's *Air Quality Impact Analysis* (AQIA; Urban Crossroads 2023a) and the Project's *Energy Analysis* (EA) (Urban Crossroads 2023b), which are contained in Appendices B and I, respectively, of this EIR. The land uses evaluated within the AQIA and EA rely on a previous Project description that would generate more trips, and consequently more emissions compared to the proposed Project. Therefore, the analysis provided presents a conservative analysis of anticipated impacts.

The following discussion is related to the potential for the proposed Project to have impacts due to inefficient, wasteful, and unnecessary consumption of energy resources during construction or operation, or a conflict with a state or local plan for renewable energy or energy efficiency.

There were no comments received on the 2022 or 2023 NOPs or at the July 20, 2022 Draft EIR public scoping meeting regarding energy.

4.5.1 Existing Setting

Energy sources are classified as non-renewable if they cannot be replenished in a short period of time. Therefore, non-renewable energy resources include fossil fuels. Fossil fuels, which consist of oil, coal, natural gas, and associated byproducts, provide the energy required for most motorized vehicles and generation of electricity at power plants. Thus, the discussion of energy conservation most relevant to the Project is focused on Project-generated electricity demand, natural gas demand, and fuel consumption.

4.5.1.1 Electricity

The Southern California region's electricity reliability has been of concern for the past several years due to the planned retirement of aging facilities that depend upon once-through cooling technologies, as well as the June 2013 retirement of the San Onofre Nuclear Generating Station (San Onofre). While the once-through cooling phase-out has been ongoing since the May 2010 adoption of the State Water Resources Control Board's once-through cooling policy, the retirement of San Onofre has complicated the situation. California ISO studies revealed the extent to which the South California Air Basin (SCAB) and the San Diego Air Basin (SDAB) region were vulnerable to low-voltage and post-transient voltage instability concerns. A preliminary plan to address these issues was detailed in the 2013 Integrative Energy Policy Report (IEPR) after a collaborative process with other energy agencies, utilities, and air districts. Similarly, the subsequent 2021 IEPR's provides information and policy recommendations on advancing a clean, reliable, and affordable energy system (CEC 2022c).

Electricity is currently provided to the City of Perris 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 2020 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 (CEC 2020).

California’s electricity industry is an organization of traditional utilities, private generating companies, and state agencies, each with a variety of roles and responsibilities to ensure that electrical power is provided to consumers. The California Independent Service Operator (ISO) is a nonprofit public benefit corporation and is the impartial operator of the state’s wholesale power grid and is charged with maintaining grid reliability, as well as directing uninterrupted electrical energy supplies to California’s homes and communities. While utilities still own transmission assets, the ISO routes electrical power along these assets, maximizing the use of the transmission system and its power generation resources. The ISO matches buyers and sellers of electricity to ensure that enough power is available to meet demand. To these ends, every five minutes the ISO forecasts electrical demands, accounts for operating reserves, and assigns the lowest cost power plant unit to meet demands while ensuring adequate system transmission capacities and capabilities (California ISO 2022).

Part of the ISO’s charge is to plan and coordinate grid enhancements to ensure that electrical power is provided to California consumers. As a result, utilities file annual transmission expansion/modification plans to accommodate the state’s growing electrical needs. The ISO reviews and either approves or denies the proposed additions. Additionally, the ISO works with other areas in the western United States electrical grid to ensure that adequate power supplies are available to the state. In this manner, continuing reliable and affordable electrical power is assured to existing and new consumers throughout the state.

Tables 4.5-1, *SCE 2020 Power Content Mix*, identifies SCE’s specific proportional shares of electricity sources in 2020. As indicated in Table 4.5-1, the 2020 SCE Power Mix has renewable energy at 30.9 percent of the overall energy resources. Geothermal resources are at 5.5 percent, wind power is at 9.4 percent, large hydroelectric sources are at 3.3 percent, solar energy is at 15.1 percent, and coal is at 0 percent (CEC 2020).

Table 4.5-1
SCE 2020 POWER CONTENT MIX

Energy Resources	2020 SCE Power Mix
<i>Eligible Renewable</i>	30.9%
Biomass & Waste	0.1%
Geothermal	5.5%
Eligible Hydroelectric	0.8%
Solar	15.1%
Wind	9.4%
<i>Coal</i>	0.0%
<i>Large Hydroelectric</i>	3.3%
<i>Natural Gas</i>	15.2%
<i>Nuclear</i>	8.4%
<i>Other</i>	0.3%
Unspecified Sources of power*	42.0%
Total	100%

* “Unspecified sources of power” means electricity from transactions that are not traceable to specific generation sources.

SCE has exceeded the 2020 Renewables Portfolio Standard (RPS) requirement of 33 percent. Therefore, SCE is in full compliance with the California renewable energy goals and legislative mandates and is on track to meet the 2030 RPS procurement mandate of 60 percent per Senate Bill (SB) 100 which will

require all of California’s electricity to come from carbon-free sources by 2045 (CPUC 2020).

SCE’s electricity consumption by sector as of 2020 is provided in Table 4.5-2, *Electricity Consumption in SCE Service Area (2020)*.

Table 4.5-2
ELECTRICITY CONSUMPTION IN SCE SERVICE AREA (2020)^{1,2}

Agriculture & Water Pump	Commercial Building	Commercial Other	Industry	Mining & Construction	Residential	Streetlight	Total Usage
3,111.6	28,799.6	4,449.4	12,449.5	1,821.9	32,475.1	425.5	83,532.6

¹ California Energy Commission, Energy Consumption Data Management System, California Energy Consumption Database, interactive web tool (CEC 2022a)

² all units are million kilowatt-hours (GWh)

As shown in the table above, SCE produced approximately 83.5 billion kilowatt-hours (kWh) in 2020, of which approximately 12.4 billion kWh were consumed by industry and 32 billion kWh were consumed by the commercial building sector, those sectors which are relevant to the proposed Project. In 2010, the City consumed approximately 286,470,000 kWh of electricity (City 2016).

4.5.1.2 Natural Gas

SoCalGas (SCG) is the principal distributor of natural gas in Southern California, providing retail and wholesale customers with transportation, exchange, storage services, and procurement services to most retail core customers. SCG is a gas-only utility and, in addition to serving the residential, commercial, and industrial markets, provides gas for enhanced oil recovery (EOR) and electric generation (EG) customers in Southern California (CGEU 2020). California’s existing gas supply portfolio is regionally diverse and includes supplies from on- and off-shore California sources, southwestern United States supply sources, the Rocky Mountains, and Canada (CGEU 2020). The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from Pacific Gas and Electric (PG&E), SCG, San Diego Gas & Electric (SDG&E), Southwest Gas, and several smaller natural gas utilities (CPUC 2022a).

Natural gas demand statewide, including volumes not served by utility systems, is expected to decrease at an annual average rate of 1.0 percent through 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency standards and programs, and SB 350 goals. Other factors that contribute to the downward trend are tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, a decline in core commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI) (CGEU 2020). From 2020-2035, residential demand is expected to decline approximately one percent per year, on average due to declining use per meter. The core, non-residential markets (comprising core commercial, core industrial and Natural Gas Vehicles [NGV]) are also expected to decline at an average annual rate of 1.0 percent by 2035. However, the NGV market is expected to grow 1.45 percent over the forecast horizon. The NGV market is expected to grow due to government (federal, state, and local) incentives and regulations encouraging the purchase and operation of alternate fuel vehicles as well as the increased use of renewable natural gas that provides significant greenhouse gas (GHG) emission reduction benefits. The noncore, non-EG markets are expected to decline 0.3 percent by 2035. That decline is being driven by very aggressive energy efficiency goals and associated programs. Total EG load, including large

cogeneration and non-cogeneration EG for a normal hydro year, is expected to decrease 2.0 percent per year by 2035 (CGEU 2020).

SCG also implements energy efficiency programs. Programs administered by SCG include services that help customers evaluate their energy efficiency options and adopt recommended solutions, as well as simple equipment-retrofit improvements, such as rebates for new hot water heaters (CGEU 2020). The overall annual energy efficiency cumulative savings goal is forecast to increase from approximately 4 billion cubic feet (Bcf) in 2020 to 53 Bcf by 2035 (CGEU 2020).

Natural gas service must be provided in accordance with SCG's policies and extension rules on file with CPUC at the time contractual agreements are made. The viability of natural gas is based on present conditions of gas supply and regulatory policies. Table 4.5-3, *Natural Gas Consumption in SCG Service Area (2020)*, shows the natural gas consumption by SCE service area with the latest data available from California Energy Commission (CEC).

Table 4.5-3
NATURAL GAS CONSUMPTION IN SCG SERVICE AREA (2020)^{1,2}

Agriculture & Water Pump	Commercial Building	Commercial I Other	Industry	Mining & Construction	Residential	Total Usage
74.4	801.6	87.9	1,615.6	226.2	2,425.8	5231.4

¹ California Energy Commission, Energy Consumption Data Management System, California Energy Consumption Database, interactive web tool (CEC 2022b)

² all units are million therms

As shown in the table above, SCG produced approximately 5.2 billion therms in 2020, of which approximately 1.6 billion therms were consumed by industry and 802 million therms were consumed by the commercial building sector.

4.5.1.3 Transportation Fuel

The Department of Motor Vehicles (DMV) identified 36.2 million registered vehicles in California (DMV 2021), and those vehicles consume an estimated 17.2 billion gallons of fuel each year¹. Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to the Project patrons and employees via commercial outlets.

Fossil fuels are known to create all the United States' transportation fuels. As stated above, energy sources include oil, coal, and natural gas, which are non-renewable resources that formed when prehistoric plants and animals died and were gradually buried by layers of rock. Fossil fuel industries drill or mine for these energy sources, burn them to produce electricity, or refine them for use as fuel for heating or transportation (DOE 2022).

The 2021 Integrated Energy Policy Report (IEPR) provides the results of the California Energy Commission's assessments of a variety of energy related issues facing California. The IEPR includes a transportation energy and demand forecast that considers vehicles and associated fuels, incorporates consumer preference, regulatory impacts, economic and demographic projects, projected

¹ Fuel consumptions estimated utilizing information from EMFAC2021.

improvements in technology, and other market factors (CEC 2022c). The most recent forecast estimated that between 2021 and 2035, gasoline fuel demand for transportation in California will decline primarily due to increases in electrification and the use of zero emission vehicles (ZEV) (CEDC 2022c). Petroleum-based fuels will continue to represent the largest shares of transportation energy demand. Under the high-demand case for Light Duty Vehicle, gasoline consumption will drop from approximately 13.8 billion gross gasoline equivalents (GGE) in 2020 to approximately 11 billion GGE in 2035. Electricity consumption would increase from less than 1 billion GGE in 2020 to approximately 4 billion GGE which includes raw energy used by the plug in-vehicles, but also the gasoline energy avoided by using more plug in-vehicles. Diesel energy forecast is less than 1 GGE in 2020 and will remain roughly the same in 2035 (CEC 2022c).

Use of biomethane or renewable gas fuel in California's transportation sector has grown significantly to displace an increasing portion of fossil pipeline gas, and the state is poised for significant development of new California-based production plants in several sectors. The CEC expects a continual growth trend because of state and local government incentives, vehicle and engine technology advances, and an existing network of fueling stations located in key areas of the state (CEC 2022c).

Vehicles in California consumed 179 million diesel gallons equivalent (DGE) of fossil gas and renewable gas. Renewable gas has been directed primarily at vehicle fuels because of the low-carbon fuel standard, comprising 77 percent of the pipeline gas supply for vehicles in 2019. Renewable gas displaced 5 percent of the diesel fuel consumption in trucks (CEC 2022c).

4.5.2 Existing Policies and Regulations

4.5.2.1 Federal

At the federal level, the United States Department of Transportation (USDOT), the United States Department of Energy (DOE), and the USEPA are three agencies with substantial influence over energy policies and programs. Generally, federal agencies influence and regulate transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements. Major federal energy-related laws and plans are discussed below.

Federal Energy Policy and Conservation Act

The Federal Energy Policy and Conservation Act (EPCA) of 1975 grants specific authority to the President of the U.S. to fulfill obligations of the U.S. under the international energy program; provide for the creation of a Strategic Petroleum Reserve capable of reducing the impact of severe energy supply interruptions; conserve energy supplies through energy conservation programs; provide for improved energy efficiency of motor vehicles, major appliances and other consumer products; provide a means for verification of energy data to assure the reliability of energy data; and to conserve water by improving the water efficiency of certain plumbing products and appliances. Furthermore, the EPCA establishes fuel economy standards for on-road motor vehicles in the U.S. (GPO 2018).

The National Highway Traffic and Safety Administration (NHTSA), which is part of USDOT, is responsible for establishing additional vehicle standards and revising existing standards under the EPCA. The NHTSA has set new fuel economy standards that are estimated to require a combined passenger car and light truck average fuel economy level of 54.5 mpg by 2025 (NHTSA 2012). It should be noted that heavy-duty

vehicles (i.e., vehicles and trucks over 8,500 pounds gross vehicle weight) are not currently subject to fuel economy standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model; instead, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. For corporate manufacturers' compliance with the fuel economy standards, the USEPA calculates a value for each manufacturer, based on city and highway fuel economy test results and vehicles sales. Based on the information generated under the program, USDOT is authorized to assess penalties for noncompliance. During its 30-year history, this regulatory program has resulted in vastly improved fuel economy throughout the United States' vehicle fleet, and has protected against inefficient, wasteful, and unnecessary use of energy.

In 2012, NHTSA established passenger and light truck Corporate Average Fuel Economy (CAFE) standards for model years (MY) 2017 through 2021 which required, on an average industry fleet-wide basis, a range from 40.3 to 41.0 miles per gallon in MY 2021. In 2019, the NHTSA and USEPA amended certain existing CAFE and greenhouse gas emissions standards for passenger cars and light trucks and establish new standards, covering MY 2021 through 2026. However, in March 2022, the NHTSA and USEPA revised the standards covering MY 2024 through 2026 to require an industry fleet-wide average of roughly 49 mpg in MY 2026 (NHTSA 2022).

Intermodal Surface Transportation Efficiency Act of 1991

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of inter-modal transportation systems to maximize mobility, as well as to address national and local interests in air quality and energy. The ISTEA contained factors that metropolitan planning organizations were required to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, metropolitan planning organizations adopted explicit policies defining the social, economic, energy, and environmental values that were to guide transportation decisions in that metropolitan area. The planning process for specific projects would then address these policies. Another requirement was to consider the consistency of transportation planning with federal, state, and local energy goals. Through this requirement, energy consumption was expected to become a decision criterion, along with cost and other values that determine the best transportation solution (USDOT 2020).

The Transportation Equity Act for the 21st Century

The Transportation Equity Act for the 21st Century (TEA-21) builds upon the initiatives established in the ISTEA legislation discussed previously. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues 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-21 also 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 (DOT 2020).

4.5.2.2 State

At the state level, the CEC and CPUC are two agencies with authority over different aspects of energy. CPUC regulates privately-owned utilities in the energy, rail, telecommunications, and water sectors. CEC collects and analyzes energy-related data, prepares statewide energy policy recommendations and plans, promotes, and funds energy efficiency programs, and adopts and enforces appliance and building energy efficiency standards. California is exempt under federal law from setting state fuel economy standards for new on-road motor vehicles. The California Air Resources Board (CARB) has responsibility for mobile source emissions in the state. Major state energy-related laws and plans are discussed below.

California Air Resources Board

CARB, which has the responsibility for control of emissions from mobile sources (CARB 2000), took the lead on addressing diesel emissions in the State of California. The first step to significantly reduce diesel emissions occurred in 2000 when CARB approved the “Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles” or Diesel Risk Reduction Plan.

Most recently, CARB approved the 2020 Mobile Source Strategy, which will deliver broad environmental and public health benefits, as well as support much needed efforts to modernize and upgrade transportation infrastructure, enhance system-wide efficiency and mobility options, and promote clean economic growth in the mobile sector (CARB 2021a). The 2020 Mobile Source Strategy includes concepts to move the state towards the goal that 100 percent of sales will be ZEVs by 2035 for on-road light-duty vehicles, 100 percent of California-registered trucks will be ZEVs by 2045, where feasible for on-road medium- and heavy-duty vehicles, and 100 percent of off-road vehicles and equipment will be zero-emission by 2035, where technologically feasible (CARB 2021a).

Advanced Clean Cars and Trucks

In January 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for MY 2017 through 2025. The program combines the control of smog-causing pollutants and GHGs with requirements for greater numbers of zero-emission vehicles (ZEVs). By 2025, when the rules will be fully implemented, the new automobiles will emit 40 percent fewer GHG emissions and 75 percent fewer smog-forming emissions (CARB 2022a). The program also requires car manufacturers to offer for sale an increasing number of ZEVs each year, including battery electric, fuel cell, and plug-in hybrid electric vehicles (EV) (CARB 2022a).

In December 2012, CARB adopted regulations allowing car manufacturers to comply with California's GHG emissions requirements for model years 2017-2025 through compliance with the USEPA GHG requirements for those same model years (CARB 2012). CARB staff is also currently developing the Advanced Clean Cars II program, which will update the state's passenger vehicle emission standards and ZEV requirements. The proposal is set for consideration in the summer of 2022.

Additionally, CARB adopted the Advanced Clean Trucks (ACT) Regulation in 2021. The ACT Regulation is part of a holistic approach to accelerate a large-scale transition of zero-emission medium- and heavy-duty vehicles from Class 2b to Class 8 and includes a manufacturers ZEV sales requirement and a one-time reporting requirement for large entities and fleets (CARB 2021b). CARB is also developing a medium and heavy-duty zero-emission fleet regulation with the goal of achieving a zero-emission truck and bus California fleet by 2045 everywhere feasible and significantly earlier for certain market segments such as last mile delivery and drayage applications.

Heavy-duty Vehicle Greenhouse Gas Regulation

In December 2008, CARB adopted the Heavy-duty Vehicle Greenhouse Gas Regulation to reduce GHG emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. Fuel efficiency is improved through improvements in tractor and trailer aerodynamics and the use of low rolling resistance tires. The tractors and trailers subject to this regulation must use USEPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. Trucks serving the Project that are not drayage trucks would be regulated under this statute and required to comply with SmartWay standards to reduce GHG emissions. As part of the regulatory package for the Heavy-duty Vehicle GHG Regulation, CARB also reviewed and implemented the Drayage Truck Regulation and Truck and Bus Regulation. These three regulations were collectively adopted to address emissions from trucks (CARB 2010).

Low Carbon Fuel Standard

Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average fuel carbon intensity for transportation fuels in California regulated by CARB. CARB identified the Low Carbon Fuel Standard (LCFS) as a Discrete Early Action item under AB 32 and the final resolution (09-31) was issued on April 23, 2009. In 2009, CARB approved for adoption the LCFS regulation which became fully effective in April 2010 and is codified at Title 17, CCR, Sections 95480-95490. The LCFS will reduce greenhouse gas emissions by reducing the carbon intensity of transportation fuels used in California by at least 10 percent by 2020. Carbon intensity is a measure of the GHG emissions associated with the various production, distribution, and use steps in the “lifecycle” of a transportation fuel. On December 29, 2011, the U.S. District Court for the Eastern District of California issued several rulings in the federal lawsuits challenging the LCFS. Opponents argued that the LCFS violates the Supremacy Clause (U.S. Constitution, Article VI, Clause 2) and Commerce Clause (US Constitution, Article 1, Section 8, Clause 3) of the U.S. Constitution by discriminating against fuel produced out-of-state. One of the district court's rulings preliminarily enjoined CARB from enforcing the regulation. In January 2012, CARB appealed that decision to the Ninth Circuit Court of Appeals. On September 18, 2013, the Ninth Circuit issued its decision affirming the District Court's conclusion that LCFS ethanol and initial crude-oil provisions are not facially discriminatory but remanded to the District Court to determine whether the LCFS ethanol provisions are discriminatory in purpose and effect. Additionally, the Ninth Circuit remanded to the District Court with instructions to vacate the preliminary injunction against CARB's enforcement of the regulation (*Rocky Mountain Farmers Union v. Corey* [2013] U.S. Court of Appeals for the 9th Circuit No. 12-15131.).

Scoping Plan

The Scoping Plan is a strategy CARB develops and updates at least one every five years, as required by AB 32. It lays out the transformations needed across our society and economy to reduce emissions and reach our climate targets. The current 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) is the third update to the original plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 mandate of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual. The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan assessed progress toward achieving the 2020 mandate and made the case for addressing short-lived climate pollutants (SLCPs). The 2017 Scoping Plan also assessed the progress toward achieving the 2020 limit and provided a technologically feasible and cost-effective path to achieving the

SB 32 mandate of reducing GHGs by at least 40 percent below 1990 levels by 2030. On December 15, 2022, CARB approved the 2022 Scoping Plan. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279. Additionally, the Scoping Plan seeks to achieve carbon neutrality by 2045. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels; further reductions in SLCPs; support for sustainable development; increased action on natural and working lands to reduce emissions and sequester carbon; and the capture and storage of carbon (CARB 2022b).

California Energy Commission

The CEC was formed by Assembly Bill (AB) 1575 and is the state's primary energy policy and planning agency. AB 1575, which was adopted in 1975 in response to the oil crisis of the 1970s, also requires EIRs to consider wasteful, inefficient, and unnecessary consumption of energy and was the driving force behind the creation of State CEQA Guidelines Appendix F. The CEC was established to address the state's energy challenges and is responsible for the creation of the State Energy Plan. The State Energy Plan identifies the emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The State Energy Plan recommends that the state assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the fewest environmental and energy costs. The State Energy Plan also identifies a number of strategies, including aiding public agencies and fleet operators, encouraging urban designs that reduce vehicles miles traveled, and accommodating pedestrian and bicycle access.

California Public Utilities Commission

The CPUC regulates investor-owned electric and natural gas utilities operating in the state, including SCG. The CPUC regulates the natural gas rates and natural gas services, including in-state transportation over the utilities' transmission and distribution pipeline systems, storage, procurement, metering, and billing. CPUC policy on natural gas infrastructure and capacity is to (1) allow gas utilities to gain better access to new sources of supply, develop a diverse supply portfolio, and have adequate storage capacity for core procurement requirements; (2) ensure adequate, diverse utility natural gas pipeline and storage infrastructure for utilities and consumers; (3) assure delivery of supplies with a high degree of certainty, especially for core customers; (4) minimize transmission constraints; (5) provide access to a diverse portfolio of supplies; (6) reduce the likelihood of price spikes; (7) allow more gas to be stored when prices are low; (8) allow customers to match supplies with requirements; and (9) obtain fair access to utility transmission systems for suppliers and pipelines.

California Energy Code

The California Energy Code (Title 24, Part 6 of the California Code of Regulations [CCR]) was established in 1978 to reduce California's energy consumption. Energy use standards in the code are updated periodically to reduce per-capita energy use and to include new programs, such as the California Renewable Energy Portfolio Standards and the California Solar Initiative. In 2008, the CPUC adopted the state's first "Long-Term Energy Efficiency Strategic Plan" for achieving energy savings in various sectors throughout California. In 2011, the Strategic Plan was updated to include a chapter related to lighting.

Title 20 of the California Code of Regulations

California's Appliance Efficiency Regulations (CCR Title 20, Parts 1600–1608) contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California (CEC 2022e).

Title 24 of the California Code of Regulations

The California Energy Code (CCR Title 24, Part 6) was established in 1978 to reduce California's energy consumption. Energy use standards in the code, referred to as Building Energy Efficiency Standards, are updated on an approximately three-year cycle (CEC Standards). Energy consumption by new buildings in the state is regulated by The California Energy Code via the Building Energy Efficiency Standards. These efficiency standards (commonly referred to as Title 24 standards) apply to newly constructed buildings and additions and alterations to existing buildings (CEC 2022f). They are designed to reduce wasteful, uneconomic, inefficient, or unnecessary consumption of energy, and enhance outdoor and indoor environmental quality.

The current 2022 Building Energy Efficiency Standards (Energy Code), which goes into effect January 1, 2023, focuses on four key areas in new construction of homes and business by encouraging (1) electric heat pump technology and use; (2) establishing electric-ready requirements when natural gas is installed; (3) expanding solar photovoltaic (PV) system and battery storage standards; and (4) strengthening ventilation standards to improve indoor air quality. Specifically, the 2022 updates require all new homes to be electric-ready. That means buildings with gas stoves have electrical panels and wiring to support a switch to electric stoves. Further advancements and cost reductions will continue to expand electric options for heating, cooking, laundering, and EV charging to meet all Californians' needs (CEC 2022f). The Project will be subject to the Title 24 Standards in effect at the time of building permits. It is projected that the 2022 building efficiency standards will reduce 10 million metric tons of GHGs over 30 years. This reduction is equivalent to taking nearly 2.2 million cars off the road for a year. On a statewide basis throughout 2023, all measures for newly constructed buildings and altered components of existing buildings collectively would save approximately 33 million therms of fossil fuel natural gas and 1.3 billion kWh of electricity.²

Green Building Standards

The purpose of Title 24, specifically Part 11, known as the California Green Building Standards (CALGreen) Code, is to encourage sustainable construction practices that reduce negative impacts on the environment through planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality (CBSC 2019). The CALGreen Code is applicable to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout the state. The California Green Building Standards applicable to this Project are detailed below.

² Per the Draft Environmental Impact Report Amendments to the Building Energy Efficiency Standards (<https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency>).

Non-Residential Mandatory Measures

- 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 percent of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- 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 as shown in Table 5.106.5.2 (5.106.5.2).
- 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 for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, upright and glare ratings per Table 5.106.8 (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- 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 more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - Water closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)

- Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallon per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
- Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
- Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallon per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- Outdoor potable water uses 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 Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 square feet or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 square feet. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 square feet requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 square feet and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

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 health and 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.

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 Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (AB 939) requires each jurisdiction in California to submit detailed solid waste planning documents for the California Department of Resources, Recycling, and Recovery's (CalRecycle) approval, set diversion requirements of 25 percent in 1995 and 50 percent in 2000, established a comprehensive statewide system of permitting, inspections, enforcement, and maintenance for solid waste facilities, and authorized local jurisdictions to impose fees based on the types or amounts of solid waste generated (CalRecycle 2018a). As of 2007, jurisdictional diversion rates are no longer calculated; with the passage of the Per Capita Disposal Measurement System (SB1016), only per capita disposal rates are measured. CalRecycle compares each jurisdiction's reported disposal tons to population to calculate per capita disposal in pounds per person per day (CalRecycle 2018b). The City achieved an annual per capita disposal rate of 6.2 pounds per day per resident, and 23.1 pounds per day per employee in 2020, the most recent data available (CalRecycle 2020a).

AB 341 (2011) amended AB 939 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter (Public Resources Code Section 41780.01). The state did not meet its 75 percent by 2020 recycling goal set out in AB 341. However, CalRecycle identified five strategies and three additional focus areas that can be pursued by the state to reach the 75 percent goal (CalRecycle 2020b).

The City contracts with CR&R for waste management. Regarding construction and demolition material, CR&R offers a variety of ways to recycle and reduce waste on construction sites. Landfill is further reduced through construction waste re-planning, source separation, mixed recycling, and the reuse or donation of used or excess construction materials (City 2016).

Renewable Portfolio Standard

Established in 2002 under SB 1078, accelerated in 2006 under SB 107, in 2011 under SBX1-2, in 2015 under SB 350, and again in 2018 under SB 100, California's Renewable Portfolio Standard (RPS) required retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020 (SB 1078, SB 1368). The 33 percent standard was consistent with the RPS goal established in the Scoping Plan (CARB 2008). Initially, the RPS provisions applied to investor-owned utilities, community choice aggregators, and electric service providers. SBX1-2 added, for the first time, publicly owned utilities to the entities subject to RPS.

Senate Bill 350 (SB 350), signed in 2015, increased the RPS from 33 percent in 2020 to 50 percent by 2030 and will double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation by 2030 (CARB 2017).

Senate Bill 100 (SB 100) was subsequently signed in 2018 and directs CPUC, CEC, and CARB to plan for 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. SB 100 also accelerates the RPS target to 50 percent by 2026 and to 60 percent by 2030.

4.5.2.3 Local

Perris Comprehensive General Plan 2030

The Perris GP 2030 sets forth objectives and policies to promote minimizing the use of energy and instead generating electricity from renewable resources to ensure plentiful future supply and reducing the negative impacts on the environment. Specifically, the Conservation and Healthy Community Element focuses on conserving, among other items, energy resources. The relevant Perris GP goals, policies, and implementation measures, which are intended to conserve energy in the City, are discussed below.

Conservation Element

Goal VIII - Create a vision for energy and resource conservation and the use of green building design for the City which provides for the protection of the environment while improving the quality of life and promoting sustainability.

Policy VIII.A - Adopt and maintain development regulations, which encourage water and resource conservation.

Implementation Measures

VIII.A.2 - Use indigenous and/or drought-resistant planting and efficient irrigation systems with smart controls in all new and refurbished commercial and industrial development projects. Also, restrict use of turf to 25 percent or less of the landscaped areas.

VIII.A.4 - Use gray water, and water-conserving appliances and fixtures within all new commercial and industrial developments.

Policy VIII.C - Adopt and maintain development regulations which encourage increased energy efficiency in buildings, and the design of durable buildings that are efficient and economical to own and operate. Encourage green building development by establishing density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who meet LEED building standards for new and refurbished developments (U.S. Green Building Council's Leadership in Energy and Environmental Design green building programs).

Implementation Measures

VIII.C.3 - Encourage the design and construction of durable buildings that are efficient and economical to own and operate.

VIII.C.4 - Review new development projects for compliance with the design guidelines contained within the Sustainable Community section through Conditions of Approval and a finding that the project conforms to the General Plan.

VIII.C.5 - Encourage green building density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who meet LEED building standards for new developments.

Goal IX - Encourage project designs that support the use of alternative transportation facilities.

Policy IX.A - Encourage land uses and new development that support alternatives to the single occupant vehicle.

Implementation Measures

IX.A.1 - Encourage installation of shared vehicle parking and support facilities within new and refurbished commercial and industrial developments, i.e., dual fuel vehicles and charging systems on site, carpool parking, and bus stop shelters.

IX.A.2 - Install bicycle paths and create secure and accessible bicycle storage for visitors and occupants within new and refurbished commercial and industrial developments.

IX.A.4 - Encourage building and site designs that facilitate pedestrian activity, such as locating buildings close to the street and providing direct connections to public walkways and neighboring land uses.

IX.A.5 - The City shall require all new public and private development to include bike and walking paths wherever feasible.

Goal X - Encourage improved energy performance standards above and beyond the California Title 24 requirements.

Policy X.A - Establish density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who exceed current Title 24 requirements for new development.

Policy X.B - Encourage the use of trees within project design to lessen energy needs, reduce the urban heat island effect, and improve air quality throughout the region.

Policy X.C - Encourage strategic shape and placement of new structures within new commercial and industrial projects.

Implementation Measures

X.C.1 - Promote energy conservation by taking advantage of natural site features such as natural lighting and ventilation, sunlight, shade, and topography during the site plan process.

X.C.2 - When possible, locate driveways and parking on the east and north sides of buildings to reduce heat buildup during hot afternoons.

Healthy Community Element

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.

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

City of Perris Community Energy Action Plan and Climate Action Plan

At the subregional level, the Western Riverside Council of Governments (WRCOG) developed a CAP to assist local cities and jurisdictions in meeting statewide goals, as well as to encourage input and coordination among participating jurisdictions. Perris was a participating member. To meet emissions reduction targets, the WRCOG CAP considers existing programs and policies in the subregion that achieve GHG emissions reductions, in addition to new GHG reduction measures. This CAP uses consistent methodologies and allows jurisdictions to collaboratively implement regionally effective measures using economies of scale which may lead to lower administrative costs and greater publicity of incentives. Several proposed measures apply to participating jurisdictions uniformly because they respond to adoption of a state law (e.g., the Low Carbon Fuel Standard) or result from programs administered at the discretion of a utility serving multiple jurisdictions (e.g., utility rebates). The Perris CAP was adopted in 2016 and included the GHG inventories and forecasts from the WRCOG CAP. However, the CAP did not demonstrate compliance with the statewide GHG goal established by SB 32 for 2030 because it was adopted prior to SB 32. Additional discretionary measures have been adopted by participating jurisdictions, including Perris, to voluntarily commit to a participation level that can be implemented in their community.

One of the discretionary measures the City has undertaken is the development of Perris's Community Energy Action Plan (CEAP). The CEAP was adopted in 2014 to improve the energy efficiency of the City. Based on the energy efficiency analysis, the CEAP will assist the City in prioritizing goals, policies, and assign appropriate energy consumption reduction targets across the community. The CEAP includes statewide policies as R1 reduction measures. The R1 measures are consistent with all the anticipated reduction strategies identified in the AB 32 Scoping Plan for implementation at the state level that will ultimately result in a reduction of GHG emissions at the local level. The CEAP R2 and R3 measures describe local actions which would be incorporated to provide additional reductions in GHG emissions. R2 measures can be quantified to show the value of the reduction in GHG emissions. The R3 measures are supportive measures or methods of implementation for the R2 measures. R3 measures provide a program through which reductions in emissions would occur, but their value cannot be quantified.

4.5.2.4 Applicable PVCCSP Standards and Guidelines and Mitigation Measures

There are no specific standards or guidelines related to energy conservation identified within the PVCCSP; however, Section 13.3.5 does require each new entitlement to attempt to achieve LEED certification:

13.3.5 LEED Certification Eligibility

- LEED Certification Eligibility is based on LEED New Construction and the California Green Building Code (part 11 of Title 24). LEED has four levels of certification: Certified, Silver, Gold, and Platinum. The project proponent must indicate a commitment to reach a particular level of LEED certification prior to project approval. At a minimum, the City will mandate that any new entitlement shall attempt to achieve a “Certified” status. For each level of LEED Certification that the project proponent intends to meet in excess of “certified” status, the City shall reward a corresponding level of incentive.

Additionally, the PVCCSP EIR includes various mitigation measures to ensure that projects located within the PVCCSP planning area identify air quality impacts from construction and operation and mitigate any potential impacts appropriately. Relevant mitigation measures from the PVCCSP EIR address air quality impacts as well as increase energy efficiency and are therefore relevant to the analysis in this section.

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.

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 implementation of the development project with building plans and calculations.

4.5.3 Thresholds of Significance

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. Impacts related to this Project may be considered potentially significant if the proposed Project would:

- a) Result in potentially significant environmental impact 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.

4.5.4 Environmental Impacts

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

Impact Analysis

The Project would result in the demand for energy resources during both construction and long-term operation, as discussed below. Information from the California Emissions Estimator Model™ (CalEEMod) 2022.1 outputs and information provided by the Project Applicant used in the Project’s AQIA and EA (included as Appendices A and J respectively of this EIR) was utilized in the analysis of the Project’s energy consumption, which detail Project-related construction equipment, transportation energy demands, and facility energy demands. The analysis of energy impacts utilizes the assumptions from the AQIA and are further analyzed in Section 4.2 Air Quality and Section 4.7 Greenhouse Gas Emissions, respectively (refer to Appendix L). The EA provides more detailed energy related analysis that is utilized within this section (Appendix I).

Construction Energy Demands

The total Project construction electricity usage is the summation of the products of the power cost detailed above by the utility provider cost per kilowatt hour (kWh) of electricity. SCE's general service rate schedule was used to determine the Project's electrical usage. As of January 1, 2022, SCE's general service rate is \$0.13 per kilowatt hours (kWh) of electricity for industrial services (SCE 2022d). As shown on Table 4.5-4, *Construction Electricity Usage*, the total electricity usage from on-site Project construction related activities is estimated to be approximately 443,920 kWh (Urban Crossroads 2022b).

**Table 4.5-4
CONSTRUCTION ELECTRICITY USAGE**

Land Use	Cost per kWh	Project Construction Electricity Usage (kWh)
High-Cube Fulfillment	\$0.13	226,705
Parking Lot	\$0.13	196,723
Strip Retail	\$0.13	9,024
High Turnover Restaurant	\$0.13	1,464
Fast Food Without Drive-Thru	\$0.13	6,960
Fast Food With Drive-Thru	\$0.13	3,045
Construction Electricity Usage		443,920

kWh = kilowatt hour

Project construction would require the use of construction equipment for grading, hauling, and building activities, as well as construction workers and vendors traveling to and from the Project site.

Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. Consistent with industry standards and typical construction practices, each piece of equipment listed in the Project AQIA (Appendix B of this EIR) would 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. It should be noted that most pieces of equipment would likely operate for fewer hours per day. Project construction activity timeline estimates, construction equipment schedules, equipment power ratings, load factors, and associated fuel consumption estimates are presented in Table 4.5-5, *Construction Equipment Fuel Consumption Estimates*. The aggregate fuel consumption rate for all equipment is estimated at 18.5 horsepower hour per gallon (hp-hr-gal.), obtained from CARB 2018 Emissions Factors Tables and cited fuel consumption rate factors presented in Table D-24 of the Moyer guidelines (CARB 2018). For the purposes of this analysis, the calculations are based on all construction equipment being diesel-powered, which is consistent with industry standards.

**Table 4.5-5
CONSTRUCTION EQUIPMENT FUEL CONSUMPTION ESTIMATES**

Activity/ Duration	Duration (Days)	Equipment	HP Rating	Quantity	Usage Hours	Load Factor	HP- hrs/day	Total Fuel Consumption (gal. diesel fuel)
Site Preparation	10	Rubber Tired Dozers	367	3	8	0.4	3,523	1,904
		Crawler Tractors	87	4	8	0.43	1,197	647
Grading	30	Excavators	36	2	8	0.38	219	355
		Graders	148	1	8	0.41	485	787
		Rubber Tired Dozers	367	1	8	0.4	1,174	1,904
		Scrapers	423	2	8	0.48	3,249	5,268
		Crawler Tractors	87	2	8	0.43	599	971
Building Construction	300	Cranes	367	1	8	0.29	851	13,807
		Forklifts	82	3	8	0.2	394	6,383
		Generator Sets	14	1	8	0.74	83	1,344
		Tractors/ Loaders/ Backhoes	84	3	8	0.37	746	12,096
		Welders	46	1	8	0.45	166	2,685
Paving	20	Pavers	81	2	8	0.42	544	588
		Paving Equipment	89	2	8	0.36	513	554
		Rollers	36	2	8	0.38	219	237
Architectural Coating	40	Air Compressors	37	1	8	0.48	142	307
Construction Fuel Demand (Gallons Diesel Fuel)								49,839

It is conservatively assumed that construction of the industrial warehouse and southern and western commercial retail areas would be completed in one phase, lasting approximately 11 months. Construction equipment used by the Project would result in single event consumption of approximately 49,839 gallons of diesel fuel. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive, and Project construction equipment would conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies (Urban Crossroads 2022b).

With respect to estimated VMT for the Project, the construction worker trips (personal vehicles used by workers commuting to the Project from home) would generate an estimated 2,026,120 VMT during the 12 months of construction. Construction worker trips for full construction of the Project would result in the estimated fuel consumption of 74,730 gallons of fuel. Additionally, fuel consumption from construction vendor trips (MHDTs and HHDTs) and haul trucks (HHDTs) will total approximately 77,986 gallons. Diesel fuel would be supplied by local and regional commercial vendors. Indirectly, construction energy efficiencies and energy conservation would be achieved through the bulk purchase, transport,

and use of construction materials. The 2021 IEPR released by the CEC has shown that fuel efficiencies are getting better within on and off-road vehicle engines due to more stringent government requirements (CEC 2022c).

CCR Title 13, Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Best Available Control Measures (BACMs) inform construction equipment operators of this requirement. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints. As supported by the preceding discussions, Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary, and impacts would be less than significant.

Operational Energy Demands

Transportation Energy Demands

According to the analysis presented in Appendix I, annual vehicular trips and related VMT generated by the operation of the Project would result in a fuel demand of 2,439,088 gallons of fuel (Urban Crossroads 2022b).

Fuel would be provided by current and future commercial vendors. Trip generation and VMT generated by the Project are consistent with other retail and industrial uses of similar scale and configuration, as reflected respectively in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Ed., 2021); and CalEEMod. As such, Project operations would not result in excessive and wasteful vehicle trips and VMT, nor excess and wasteful vehicle energy consumption compared to other industrial uses.

It should be noted that the state strategy for the transportation sector for medium and heavy-duty trucks is focused on making trucks more efficient and expediting truck turnover rather than reducing VMT from trucks. This contrasts with 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 and energy demand 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% 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.

The proposed Project would implement PDFs that would facilitate accessibility, parking, and loading of trucks on site.

The Project would achieve enhanced fuel economies pursuant to federal and state regulatory actions, and through transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells), which would likely decrease future gasoline fuel demands per VMT. The location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. The Project would provide sidewalks, facilitating and encouraging pedestrian access. Facilitating pedestrian and bicycle access would reduce VMT and associated energy consumption. In compliance with the California Green Building Standards Code and City requirements, the Project would promote the use of bicycles as an alternative means of transportation by providing short-term and/or long-term bicycle parking accommodations. As supported by the preceding discussions, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary, and impacts would be less than significant.

Facility Energy Demands

According to the analysis presented in Appendix I, Project facility operational energy demands are estimated at: 4,650,806 kBTU/year of natural gas; and 5,829,580 kWh/year of electricity. Natural gas would be supplied to the Project by SoCalGas; electricity would be supplied by SCE. The Project includes conventional industrial and retail uses reflecting contemporary energy efficient/energy conserving designs and operational programs. The Project does not include uses that are inherently energy intensive and the energy demands in total would be comparable to other industrial uses and retail of similar scale and configuration.

Compliance with state Title 24 and CALGreen standards, and PVCCSP design standards and guidelines related to LEED certification, and PVCCSP EIR mitigation measures MM Air 19 and MM Air 20 would ensure the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. No further Project-specific mitigation measures would be required.

Implementation of the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resource that may have a significant impact on the environment. Impacts would be less than significant and no mitigation would be required.

Mitigation Measures

The Project is required to comply with the applicable PVCCSP Section 13.3.5 guidance and PVCCSP EIR mitigation measures described in Section 4.5.2.4. No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Threshold b: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact Analysis

The Project would be subject to applicable PVCCSP EIR mitigation measures (mitigation measures MM Air 19 and MM Air 20) that would serve to reduce the Project's level of energy consumption. Additionally, several levels of government have implemented regulatory programs in response to reducing GHG emissions, which consequently serve to increase energy efficiency. Several state agencies, including CARB, California Energy Commission, California Public Utilities Commission, CalRecycle, California Department of Transportation (Caltrans), and the Department of Water Resources have developed regulatory and incentive programs that promote energy efficiency. Many of the regulations regarding energy efficiency are focused on increasing building efficiency and renewable energy generation, promoting sustainability through energy conservation measures, as well as reducing water consumption and VMT. As described above in Section 4.5.2, the proposed Project will meet and/or exceed these regulatory requirements and implement additional design features. Additionally, and as discussed below, the Project would be consistent with or otherwise would not conflict with state or local plans related to energy conservation. Federal plans are also discussed for informational purposes.

- **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 Electrification Pathway (CPEP) white paper builds on existing state programs and policies. As such, the Project is consistent with, and would not otherwise interfere with, nor obstruct implementation of the goals presented in the 2021 IEPR. Additionally, the Project will comply with the applicable Title 24 standards which would ensure that the Project energy demands would not be inefficient,

wasteful, or otherwise unnecessary. As such, development of the proposed Project would support the goals presented in the 2021 IEPR.

- **State of 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.
- **California Code, Title 24, Part 6, Energy Efficiency Standards.** The 2022 version of Title 24 was adopted by the CEC and became effective on January 1, 2023. The Project would be required to comply with the applicable standards in place at the time building permit document submittals are made. The CEC anticipates that the 2022 energy code will provide \$1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons (CEC 2021). Therefore, the Project would not result in a significant impact on energy resources. The proposed Project would be subject to Title 24 standards.
- **California Code, Title 24, Part 11, CALGreen.** As previously stated, 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 2022 California Green Building Code Standards that were published on July 1, 2022 and became effective on January 1, 2023. The Project would be required to comply with the applicable standards in place at the time building permit document submittals are made.
- **AB 1493 Pavley Regulations and Fuel Efficiency Standards.** AB 1493 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 the requirements under AB 1493.
- **California's RPS.** 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 – Clean Energy and Pollution Reduction Act of 2015.** 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 the implementation of SB 350. Additionally, the Project would be designed and constructed to implement energy efficiency measures for new retail and industrial developments.

In addition, the Project would be consistent with applicable goals and policies within the Perris GP 2030. Through implementation of energy conservation measures and sustainable practices, the Project will not use large amounts of energy in a manner that is wasteful or otherwise inconsistent with adopted standards, plans or policies.

The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts due to a conflict with or obstruction of a state or local plan for renewable energy efficiency would therefore be less than significant.

Mitigation Measures

The Project is required to comply with the applicable PVCCSP Section 13.3.5 guidance and PVCCSP EIR mitigation measures described in Section 4.5.2.4. No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

4.5.5 Cumulative Impacts

Project construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservation goals within the State of California. Other cumulative developments within the region would similarly be required to demonstrate that the wasteful, inefficient, or unnecessary consumption of energy would not occur. Additionally, other cumulative developments would be subject to the same regulatory requirements as the proposed Project, including compliance with the 2022 Title 24 Building and Energy Efficiency Standards, which would ensure that cumulative development does not result in the wasteful, inefficient, or unnecessary consumption of energy. As such, the Project would not result in a potentially cumulatively considerable environmental impact due to wasteful, inefficient, or unnecessary consumption of energy. Thus, impacts would be less-than-cumulatively considerable.

Further, the proposed Project and other cumulative developments are subject to current California Building Code requirements and must comply with the 2022 Building and Energy Efficiency Standards and the 2022 California Green Building Standards requirements. The Project and other cumulative developments also inherently would be consistent with the IEPR, State of California Energy Plan, Title 24 Energy Efficiency Standards, AB 1493 (Pavley), and SB 350, as discussed herein. As such, impacts due to a conflict with or obstruction of a state or local plan for renewable energy or energy efficiency would be less-than-cumulatively considerable.

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2023b. OLC3 (DPR22-00006, TPM22-05048, SPA22-05047) Energy Analysis Report. June 21, 2023.

4.6 GEOLOGY AND SOILS

This section describes the existing geology and soils within the Project area and analyzes the potential impacts of existing geotechnical hazards that may adversely affect the Project or may be exacerbated by Project implementation. The analysis in this section is based primarily on the following site-specific technical reports prepared for the Project, which are included in Appendix J and Appendix K of this EIR, and on information included in the Perris Valley Commerce Center Specific Plan Final EIR (PVCCSP Final EIR) (Albert A. Webb Associates 2011), which is incorporated by reference. All references used in this Section are listed below in Subsection 4.6.6, References.

- *Preliminary Geotechnical Interpretative Report prepared for the OLC3 Ramona Expressway and Perris Boulevard Commercial Warehouse Project* (Project). Prepared by Earth Strata Geotechnical Services (ESGS). December 13, 2021. (Appendix J)
- *Paleontological Resource Assessment for the Perris Ramona Expressway and Perris Boulevard Warehouse Project*. Prepared by Stantec Consulting Services (Stantec). August 4, 2023. (Appendix K)

There were no comments received on the 2022 or 2023 NOPs or at the July 20, 2022 Draft EIR scoping meeting regarding geology and soils.

4.6.1 Existing Setting

4.6.1.1 Regional Geology

Regionally, the City of Perris is located in the Peninsular Ranges Geomorphic Province of California. The Peninsular Ranges are characterized by northwest trending steep mountain ranges separated by sediment filled elongated valleys. The dominant structural geologic features reflect the northwest trend of the province. Associated with and subparallel to the San Andreas Fault are the San Jacinto Fault, Newport-Inglewood, and the Whittier-Elsinore Fault. The Santa Ana Mountains abut the west side of the Elsinore Fault while the Perris Block forms the other side of the fault zone to the east. The Perris Block is bounded to the east by the San Jacinto Fault. The northern perimeter of the Los Angeles basin forms part of a northerly dipping blind thrust fault at the boundary between the Peninsular Ranges Province and the Transverse Range Province.

The mountainous regions within the Peninsular Ranges Province are comprised of Pre-Cretaceous, metasedimentary, and metavolcanic rocks along with Cretaceous plutonic rocks of the Southern California Batholith. The low-lying areas are primarily comprised of Tertiary and Quaternary non-marine alluvial sediments consisting of alluvial deposits, sandstones, claystones, siltstones, conglomerates, and occasional volcanic units. A map illustrating the regional geology is presented on the Regional Geologic Map, included as Figure 2 in Appendix J.

4.6.1.2 Local Geology

The earth materials at the Project site are primarily comprised of topsoil and Quaternary alluvial materials. A general description of the dominant earth materials observed on the site is provided below:

- Topsoil (no map symbol): Residual topsoil, encountered in the upper 1 to 2 feet, blankets the site and underlying bedrock. These materials were noted to be generally light brown, silty sand which were very porous, dry and in a medium dense state.
- Quaternary Very Old Alluvial-Fan Deposits (map symbol Qvof): Quaternary very alluvial old fan deposits were encountered to the full depth of our exploration. The very old fan deposits consist predominately of light to dark brown to reddish brown, clayey sand and silty sand. These deposits were generally noted to be in a dry to moist, medium dense to very dense state.

4.6.1.3 Groundwater

Groundwater was not observed during subsurface exploration and is not expected to be encountered during grading.

4.6.1.4 Faulting and Seismicity

The City of Perris is in a seismically active region and as a result, significant ground shaking will likely impact the Project site within the design life of the proposed Project. The geologic structure of the entire southern California area is dominated by northwest-trending faults associated with the San Andreas Fault system, which accommodates for most of the right lateral movement associated with the relative motion between the Pacific and North American tectonic plates. Known active faults within this system include the Newport-Inglewood, Whittier-Elsinore, San Jacinto, and San Andreas Faults.

No active faults are known to cross the Project site and the site is not located within an Alquist-Priolo Earthquake Fault Zone, which was established by the State of California to restrict the construction of new habitable structures across identifiable traces of known active faults. An active fault is defined by the State of California as having surface displacement within the past 11,000 years or during the Holocene geologic time period. Based on mapping of the Project site, review of current and historical aerial imagery, lack of lineaments indicative of active faulting, and the data compiled during the preparation of the geotechnical report prepared for the Project, the potential for surface rupture to adversely impact the Project is very low to remote.

Based on the review of regional geologic maps and applicable computer programs (USGS Seismic Design Maps, Caltrans ARS online, and USGS Earthquake Hazard Programs), the San Jacinto Fault with an approximate source to site distance of 11.52 kilometers (7.2 miles) is the closest known active fault anticipated to produce the highest ground accelerations. A list of faults as well as a list of significant historical seismic events within a 100 kilometer radius of the Project site are included in Appendix D of Appendix J of this Draft EIR.

4.6.1.5 Topography

Topographic relief at the Project site is relatively low with the terrain being generally flat. Elevations at the site range from approximately 1,450 to 1,460 feet amsl, for a difference of about 10 feet across the entire site. Drainage within the Project site generally flows to the southeast.

4.6.1.6 Paleontological Resources

A Paleontological Assessment was prepared for the Project and is included in Appendix K of this EIR. Paleontological resources, or fossils, are any evidence of ancient life. This includes the remains of the

body of an organism, such as bones, skin impressions, shell, or leaves, as well as traces of an organism's activity, such as footprints or burrows, called trace fossils. In addition to the fossils themselves, geologic context is an important component of paleontological resources, and includes the stratigraphic placement of the fossil as well as the lithology of the rock in order to assess paleoecologic setting, depositional environment, and taphonomy. Fossils are protected by federal, State, and local regulations as nonrenewable natural resources.

A records search was requested from the Western Science Center (WSC) on February 10, 2022, with the results received from the WSC on February 23, 2022. The search returned the closest known paleontological localities of the WSC to the Project area from geologic units that are present at the Project site, either at the surface or in the subsurface. Additionally, a review of the relevant scientific literature and the most recent geologic mapping was performed. To assess the paleontological potential of the Project area, the most recent geologic mapping was consulted to identify all geologic units present at the surface or likely present in the subsurface. The scientific literature was then consulted to determine the history of each of these units for preserving paleontological resources.

To assess if paleontological resources are likely to be encountered in any given area, the paleontological potential of the geologic units present in the area is assessed. Paleontological potential of a geologic unit consists of both (a) the potential for yielding abundant vertebrate fossils or for yielding significant fossils, large or small, vertebrate, invertebrate, plant, or trace fossils and (b) the importance of recovered evidence for new and significant taxonomic, phylogenetic, paleoecologic, taphonomic, biochronologic, or stratigraphic data (SVP 2010).

The results of the museum records search and the scientific literature review were used to assign the paleontological potential rankings of the SVP to the geologic units present in the Project area. These rankings are designed to inform the development of appropriate mitigation measures for the protection of paleontological resources and are widely accepted as industry standards in paleontological mitigation (Murphey et al. 2019, Scott and Springer 2003). These rankings are as follows:

- **High Potential.** Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are considered to have a high potential for containing additional significant paleontological resources. Rock units classified as having high potential for producing paleontological resources include, but are not limited to, sedimentary formations that are temporally or lithologically suitable for the preservation of fossils (e. g., middle Holocene and older, fine-grained fluvial sandstones, argillaceous and carbonate-rich paleosols, cross-bedded point bar sandstones, fine-grained marine sandstones, etc.), some volcanoclastic formations (e.g., ashes or tephra), and some low-grade metamorphic rocks.
- **Undetermined Potential.** Rock units for which little information is available in the literature or museum records concerning their paleontological content, geologic age, and depositional environment are considered to have undetermined potential. Further study and field work is necessary to determine if these rock units have high or low potential to contain significant paleontological resources.
- **Low Potential.** Rock units that are poorly represented by fossil specimens in institutional collections or, based on general scientific consensus, only preserve fossils in rare circumstances (e. g., basalt flows or Recent colluvium) have low paleontological potential.

- **No Potential.** Some rock units have no potential to contain significant paleontological resources, for instance high-grade metamorphic rocks (such as gneisses and schists) and plutonic igneous rocks (such as granites and diorites).

Geologic mapping by Morton et al. (2003) indicates the surface of the Project area consists of two geologic units: young alluvial valley deposits, present in the eastern Project area; and very old alluvial fan deposits, present in the western Project area (Figure 2 in Appendix J). These geologic units range in age from the Recent to the middle to early Pleistocene (up to 11,700 years old) and are described below.

- **Young alluvial valley deposits (Qya).** Young alluvial valley deposits are mapped at the surface in the eastern half of the Project area (Morton et al. 2003). These sediments consist of unconsolidated silty sand that dates to the Holocene and late Pleistocene (Morton et al. 2003), deposited roughly during the last 129,000 years. These sediments are likely underlain by very old alluvial valley deposits (described below), which are mapped at the surface in the western Project area and therefore may be present at shallow depths in the subsurface in areas mapped as young alluvial valley deposits. Given the extensive record of significant fossils recovered from the older layers of alluvial sediments, the young alluvial valley deposits in the Project area are here assessed as having low-to-high paleontological potential, increasing with depth.
- **Very old alluvial fan deposits (Qvof).** Very old alluvial fan deposits are mapped at the surface in the western half of the Project area (Morton et al. 2003) and are likely present in the subsurface across the entire Project area, underlying young alluvial valley deposits in the eastern Project area at an unknown but possibly shallow depth. These sediments are similar to the young alluvial valley deposits in lithology but tend to be well indurated and moderately to well dissected with duripans and silcretes present in some layers (Morton et al. 2003). These sediments date from the middle to early Pleistocene (Morton et al. 2003), deposited from 129,000 years to 2.5 Ma. Given the extensive record of significant fossils recovered from Pleistocene-aged alluvial sediments, this unit is assessed as having high paleontological potential.

4.6.2 Existing Policies and Regulations

California and Riverside County have enacted multiple laws and regulations that provide for the protection of paleontological and resources. This investigation was conducted to meet these requirements regarding paleontological resources on the lands proposed for development.

4.6.2.1 State

California Environmental Quality Act

CEQA (Public Resources Code Sections 21000 et seq) requires that before approving most discretionary projects, the Lead Agency must identify and examine any significant adverse environmental effects that may result from activities associated with such projects. As updated in 2016, CEQA separates the consideration of paleontological resources from cultural resources (Public Resources Code Section 21083.09). The State CEQA Guidelines Appendix G checklist (Title 14, Division 6, Chapter 3, California Code of Regulations [CCR] 15000 et seq.) requires an answer to the question, “Will the proposed project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?”

Under these requirements, Stantec has conducted a paleontological resources assessment to determine impacts of the proposed Project on paleontological resources within the Project area.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Special Studies Zones Act of 1972 was renamed in 1994 to the Alquist Priolo Earthquake Fault Zoning (A-P) Act. The A-P Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. Local agencies must regulate most development projects within the zones. Projects include all land divisions and most structures for human occupancy. Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet).

There are no active faults within the Project area and the Project site is not located within any A-P Earthquake Fault Zone.

Seismic Hazards Mapping Act

California Geological Survey (CGS) provides guidance with regard to seismic hazards. Under the CGS Seismic Hazards Mapping Act (SHMA) of 1990 (Public Resources Code, Chapter 7.8, Section 2690-2699.6), seismic hazard zones are identified and mapped to assist local governments in land use planning. The intent of the SHMA is to protect the public from the effects of strong ground shaking, liquefaction, landslides, ground failure, or other hazards caused by earthquakes. The SHMA requires the State Geologist to establish regulatory zones (Zones of Required Investigation) and to issue appropriate maps (Seismic Hazard Zone maps). CGS Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California, provides guidance for the evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigations.

Public Resources Code

The California Public Resources Code (PRC) (Chapter 1.7, Sections 5097 and 30244) includes additional state-level requirements for the assessment and management of paleontological resources. These statutes require reasonable mitigation of adverse impacts to paleontological resources resulting from development on state lands, define the removal of paleontological sites or features from state lands as a misdemeanor, and prohibit the removal of any paleontological site or feature from state land without permission of the applicable jurisdictional agency.

Uniform Building Code

The Uniform Building Code (UBC) is published by the International Conference of Building Officials. It forms the basis of about half the State Building Codes in the United States, including California's, and has been adopted by the State Legislature together within the Additions, Amendments, and Repeals to address the specific building conditions and structural requirements in California.

California Building Code

The California Building Code (also known as the “California Building Standards Code” or CBC) is promulgated under the California Code of Regulations (CCR) (Title 24, Parts 1 through 12) and is administered by the California Building Standards Commission (CBSC). The national model code standards adopted into Title 24 apply to all occupancies in California except for modifications adopted by State agencies and local governing bodies. The CBSC published the 2019 CBC in July 2019, which is based on the 2018 International Building Code (IBC) (the national model building code), providing standardized requirements for construction and became effective January 1, 2020. The Project would be required to comply with State requirements regarding seismic design in effect at the time building permits are issued. Cities and counties may adopt ordinances making more restrictive requirements than provided by CBC, because of local climatic, geological, or topographical conditions. Such adoptions and a finding of need statement must be filed with the California Building Standards Commission.

4.6.2.2 Local

City of Perris General Plan Conservation Element

The City of Perris (2005) has developed paleontological sensitivity mapping that divides the City into five regions for the purpose of developing paleontological mitigation recommendations. The Project is in Area 1 and Area 4 on this map (City of Perris 2005: Exhibit CN-7). The Conservation Element of the City of Perris (2005) General Plan includes a Goal for the protection of historical, archaeological, and paleontological sites (Goal IV). This goal is supported by Policy IV.A, which requires compliance with state and federal regulations to ensure preservation of significant historical, archaeological, and paleontological resources. There are several implementation measures for this policy, the following of which pertain to paleontological resources:

- 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.4- In Area 1 and Area 2 shown on the Paleontological Sensitivity Map (Exhibit CN-7), paleontologic monitoring of all projects requiring subsurface excavations will be required once any excavation begins. In Areas 4 and 5, paleontologic monitoring will be required once subsurface excavations reach five feet in depth, with monitoring levels reduced if appropriate, at the discretion of a certified Project Paleontologist.
- IV.A.6- Create an archive for the City wherein all surveys, collections, records, and reports can be centrally located.

City of Perris Ordinance No. 1230

The City of Perris Development Services Department provides technical expertise in reviewing and enforcing Building, Mechanical, Plumbing, Electrical and Fire Codes established in the City of Perris Ordinance No. 1330. These codes establish site-specific investigation requirements, construction standards, and inspection procedures to ensure that development does not pose a threat to the health, safety, and welfare of the public.

City of Perris General Plan Safety Element

The specific policies and implementation measures outlined in the City's General Plan Safety Element that are applicable to the analysis of geology and soils include:

Policy I.E - All development will be required to include adequate protection from damage due to seismic incidents.

Implementation Measures

- I.E.1- Require geological and geotechnical investigations by State-licensed professionals, in areas with potential for earthquake-induced liquefaction, landsliding, other slope instability, or settlement as part of the environmental and development review process.
- I.E.2- Require implementation of mitigation measures identified in such investigations mentioned above [in Measure I.E.1], prior to the issuance of grading and building permits.
- I.E.5- Adopt and enforce the most current version of the California Building Code (CBC).

City of Perris Building Code

Chapter 16.08 (Building, Plumbing and other Codes Adopted), of the City of Perris Municipal Code includes the City's Building Code. Building construction is governed by the CBC; however, the City has amended and provided exemptions to the CBC that address specific geologic considerations in the City. As identified in Chapter 16.08.050 (Adoption of the 2019 California Building Code), the 2019 CBC shall become the building codes of the City for regulating the erection, construction, enlargement, alteration, repair, moving, removal, demolition, conversion, occupancy, equipment, use, height, area, and maintenance of all buildings and/or structures in the City.

4.6.2.3 Applicable PVCCSP Standards and Guidelines and Mitigation Measures

Paleontological resources are now analyzed as part of the Geology and Soils section of the EIR, and are no longer included in the Cultural Resources section, as was the case when the PVCCSP EIR was prepared and certified. PVCCSP EIR mitigation measure MM Cultural 5 is included in this section as it applies to Paleontological resources. There are no PVCCSP Standards and Guidelines applicable to the analysis of geology and soils for the Project; however, the PVCCSP contains the following geological mitigation measures for the PVCCSP and implementing projects:

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.

MM Cultural 5 Prior to grading for projects requiring subsurface excavation that exceeds 5 feet in depth, proponents of the subject implementing development projects shall retain a

professional paleontologist to verify implementation of the mitigation measures identified in the approved Phase I Cultural Resources Study and to monitor the subsurface excavation that exceed five (5) feet in depth. 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 site until the paleontologist has been approved by the City.

Monitoring should be restricted to undisturbed subsurface areas of older alluvium, which might be present below the surface. The 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.

4.6.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines a project will normally have a significant adverse environmental impact on geology and soils if the project would:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:
 - i. Rupture of a known earthquake fault, as delineated on the most Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault.
 - ii. Strong seismic ground shaking.
 - iii. Seismic-related ground failure, including liquefaction.
 - iv. Landslides.
- b) Result in substantial soil erosion or the loss of topsoil;
- 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;

- d) Be located on expansive soil, as defined in Table 18-I-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property;
- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water; and
- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

4.6.4 Environmental Impacts

Threshold a: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most Alquist- Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Impact Analysis

No active faults are known to occur onsite and the Project site is not located within an Alquist-Priolo Earthquake Fault Zone. Based on this, no impact would occur.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

No Impact would occur.

Threshold a: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

ii. Strong seismic ground shaking?

Impact Analysis

Consistent with PVCCSP EIR mitigation measure MM Geo 1 above, a site-specific Geotechnical Interpretative Report has been prepared by a registered geotechnical engineer for the Project site. As previously identified, the nearest earthquake fault is the San Jacinto Valley fault zone, located approximately 8.7 miles northeast of the site (RCIT 2020). The Project area is located in an area with high regional seismicity, and the maximum credible magnitude earthquake for the San Jacinto Valley fault is 6.9 (City of Perris 2022). The risk for seismic hazards is not substantially different than the risk to properties throughout the southern California area.

Structures are required to be designed and constructed to resist the effects of seismic ground motions as provided in the 2019 California Building Code Section 1613. The design is dependent on the site class,

occupancy category I, II, III, or IV, mapped spectral accelerations for short periods (Ss), and mapped spectral acceleration for a 1-second period (S1).

In order for structural design to comply with the 2019 CBC, the USGS “US Seismic Design Maps” online tool was used to compile spectral accelerations for the Project site based on data and maps jointly compiled by the United States Geological Survey (USGS) and the California Geological Survey (CGS). The data found in Table 3 of Appendix J and is based on the Maximum Considered Earthquake (MCE) with 5% damped ground motions having a 2% probability of being exceeded in 50 years (2,475-year return period).

The seismic design coefficients were determined by a combination of the site class, mapped spectral accelerations, and occupancy category. Actual ground shaking intensities at the site may be substantially higher or lower based on complex variables such as the near source directivity effects, depth and consistency of earth materials, topography, geologic structure, direction of fault rupture, and seismic wave reflection, refraction, and attenuation rates. The mean peak ground acceleration was calculated to be 0.616g. The seismic ground shaking potential at the Project site is similar to that of most locations throughout Southern California; as such, proper foundation design, remedial grading, and other seismic safety features would be required for all Project structures in accordance with applicable building code requirements. Therefore, given compliance with current building and seismic safety requirements for proposed buildings, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Threshold a: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

iii. Seismic-related ground failure, including liquefaction?

Impact Analysis

Liquefaction occurs as a result of a substantial loss of shear strength or shearing resistance in loose, saturated, cohesionless earth materials subjected to earthquake induced ground shaking. Potential impacts from liquefaction include loss of bearing capacity, liquefaction related settlement, lateral movements, and surface manifestation such as sand boils. Seismically induced settlement occurs when loose sandy soils become denser when subjected to shaking during an earthquake. The three factors determining whether a site is likely to be subject to liquefaction include seismic shaking, type and consistency of earth materials, and groundwater level. The proposed structures will be supported by compacted fill and competent alluvium, with groundwater at a depth of greater than 15 feet. As such, the potential for earthquake induced liquefaction and lateral spreading beneath the proposed structures is considered very low to remote due to the recommended compacted fill, relatively low groundwater level, and the dense nature of the deeper onsite earth materials. Therefore, the Project would not

directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Potential impacts would be less than significant.

Threshold a: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

iv. Landslides?

Impact Analysis

Landslide debris was not observed during subsurface exploration and no ancient landslides are known to exist on the site. Additionally, no landslides are known to exist, or have been mapped, in the vicinity of the site. Geologic mapping of the site conducted during the investigation, and review of aerial imagery of the site, reveal no adjacent hillsides or indications of landslides. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No impact would occur.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

No impact would occur.

Threshold b: Would the project result in substantial soil erosion or the loss of topsoil?

Impact Analysis

Erosion is the process by which the upper layers of the surface (such as soils) are worn and removed by the movement of water or wind. Soils with characteristics such as low permeability and/or low cohesive strength are more susceptible to erosion than those soils having higher permeability and cohesive strength. Wind erosion can damage land and natural vegetation by removing soil from one place and depositing it in another. It mostly affects dry, sandy soils in flat, bare areas, but wind erosion may occur wherever soil is loose, dry, and finely granulated. According to soil data compiled by the United States Department of Agriculture (USDA), soils within the Project site and surrounding area primarily contain a low susceptibility to water and wind erosion (USDA 2020). However, under existing conditions, the Project area has the potential to contribute windblown soil and sand because it is undeveloped with no or little vegetative cover and contains loose and dry topsoil conditions.

The largest source of erosion and topsoil loss, particularly in a developed environment, is uncontrolled drainage during construction. The Project area is relatively flat, and surface water flows generally to the southeast. Ground disturbance (including over-excavation, utility trenching, and foundation excavation during construction activities on exposed soils) could lead to erosion and topsoil loss during heavy rains and windy conditions. Grading for the Project would be limited to relatively minor cuts and fills to establish design grades, to prepare building foundations, and for utility trenching/infrastructure excavation.

The Project Applicant would be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities, including grading. The NPDES permit is required for all development projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least 1 acre of total land area. The City's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires development projects to prepare and submit to the City for approval a site-specific Storm Water Pollution Prevention Plan (SWPPP) to demonstrate compliance with the NPDES permit requirements. The SWPPP is required to identify a combination of erosion control and sediment control measures (i.e., Best Management Practices) that will reduce or eliminate sediment discharge to surface water from stormwater and non-stormwater discharges during construction. The Project Applicant would be required to comply with SCAQMD Rule 403 requirements related to fugitive dust control, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion. With mandatory compliance with all applicable regulatory requirements as presented in the Air Quality and Hydrology and Water Quality sections of this EIR, the potential for water and/or wind erosion within the Project area during construction activities would be less than significant.

Regarding erosion during long-term Project operation, consistent with the PVCCSP EIR Initial Study, the Project site would be landscaped or covered with impervious surfaces and surface runoff would be captured and treated by an on-site storm drain system. Implementation of the Project would result in less long-term erosion and loss of topsoil than under the existing condition of the building site. The City's MS4 NPDES Permit requires the Project Applicant to prepare and submit to the City for approval a WQMP. The WQMP identifies an effective combination of erosion control and sediment control measures (i.e., best management practices [BMPs]) to reduce or eliminate sediment discharge to surface water from stormwater and non-stormwater discharges. The Preliminary WQMP for the Project, prepared by United Engineering Group (UEG) (included in Appendix O and P), incorporate ribbon gutters, curb and gutters, grate inlets, and subsurface storm drain systems. The storm drain systems would be used to convey flows into a proposed water quality storage basin before being pumped into a proposed bioretention basin. These design features would be effective at removing silt and sediment from stormwater runoff, and the Preliminary WQMP requires post-construction maintenance and operational measures to ensure ongoing erosion protection. Compliance with the Preliminary WQMP would be required as a condition of Project approval and long-term maintenance of on-site water quality features is required. Therefore, the Project would not result in substantial erosion or loss of topsoil during long-term operation resulting in a less than significant impact.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Potential impacts would be less than significant.

Threshold c: Would the project 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?

Impact Analysis

Settlement Potential

Settlement refers to unequal compression of a soil foundation, shrinkage, or undue loads being applied to a building after its initial construction that affect the soil foundation. Remedial grading, as recommended in the Geotechnical Interpretative Report, would remove the compressible/collapsible near-surface native alluvium, and replace these materials as compacted structural fill. The native soils that would remain in place below the recommended depth of over excavation would not be subject to significant load increases from the foundations of the new structure. With adherence to remedial grading recommendations, the post-construction static settlements of the proposed structures would be within tolerable limits. Impacts would be less than significant.

Shrinkage, Bulking and Subsidence

Subsidence is a gradual settling or sudden sinking of the ground surface (i.e., loss of elevation). The principal causes of subsidence are aquifer-system compaction, drainage of organic soils, underground mining, and natural compaction. Shrinkage is the reduction in volume in soil as the water content of the soil drops (i.e., loss of volume). Volumetric changes in earth material quantities will occur when poorly consolidated earth materials are replaced with properly compacted fill. Estimates of the percent shrinkage/bulking factors for the various geologic units observed on the subject property are based on in-place densities and on the estimated average percent of relative compaction achieved during grading. Subsidence from scarification and recompaction of exposed bottom surfaces is expected to be negligible to approximately 0.01 foot. Impacts would be less than significant.

Lateral Spreading, Landslides, and Liquefaction

Please refer to *Thresholds a.iii, and a.iv* for discussion on these topics. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Threshold d: Would the project be located on expansive soil, as defined in Table 18-I-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Impact Analysis

Expansive soils are soils that exhibit cyclic shrink and swell patterns in response to variations in moisture content. Preliminary laboratory test results indicate onsite earth materials exhibit an expansion

potential of Low as classified in accordance with 2019 CBC Section 1803.5.3 and ASTM D 4829. Additionally, testing for expansive soil conditions would be conducted upon completion of rough grading. It is common practice for the Project architect or structural engineer to require additional slab thickness, footing sizes, and/or reinforcement if expansive soils are encountered.

Consistent with General Plan measures cited above and PVCCSP EIR mitigation measure MM Geo 1, the Project would be designed and constructed in accordance with all final Geotechnical Investigations recommendations (referred to as mitigation measures in General Plan Measure I.E.2 above); and the Geotechnical Investigations shall be reviewed and approved by the City Engineer. Therefore, with compliance with City General Plan measures, the recommendations of the final Geotechnical Investigations, and PVCCSP EIR mitigation measure MM Geo 1, impacts related to expansive soils would be less than significant.

Mitigation Measures

PVCCSP EIR mitigation measure MM Geo 1 would be implemented to address risks associated with expansive soils. No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts to paleontological resources would be less than significant with incorporation of PVCCSP EIR mitigation measure MM Geo 1.

Threshold e: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Impact Analysis

The Project buildings would be connected to an existing sewer line for conveyance of wastewater to treatment facilities, and there would be no impact related to on-site soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

No impact would occur.

Threshold f: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact Analysis

The paleontological resource investigation (Appendix K) consisted of a museum records search from the Western Science Center in Hemet, Riverside County, California of the Project area and vicinity, as well as a review of the most recent geologic mapping and relevant scientific literature. This research was used to assign paleontological potential rankings of the Society of Vertebrate Paleontology (2010) to the geologic units mapped in the Project area, either at the surface or in the subsurface. The results of this assessment indicate that two geologic units are mapped at the surface in the Project area: young alluvial valley deposits, which are assessed as having low-to-high paleontological potential, increasing with depth; and very old alluvial fan deposits, which are assessed as having high paleontological potential. Project plans for ground disturbance were not available to Stantec, and so Stantec based the impacts assessment presented here on an assumption of an unquantified amount and type of ground disturbance. Ground disturbance into geologic units with high paleontological potential may encounter paleontological resources. The potential impacts would be mitigated through Project-specific mitigation measure MM GEO-1, which replaces PVCCSP EIR mitigation measure MM Cultural 5. Impacts would be less than significant with the incorporation of mitigation measure outlined below.

Mitigation Measures

Project-Specific MM GEO-1: Prior to the issuance of grading permits, the Project Applicant shall submit to and receive approval from the City of Perris Planning Division, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The PRIMMP shall include the provision of a qualified professional paleontologist (or his or her trained paleontological monitor representative) during all onsite and offsite subsurface excavation in the western portion of the Project site and all onsite and offsite subsurface excavation in the eastern portion of the site that exceeds 5 feet in depth below the pre-grade surface. The PRIMMP shall also include provisions for a Worker's Environmental Awareness Program (WEAP) training that communicates requirements and procedures for the inadvertent discovery of paleontological resources during construction, to be delivered by the paleontological monitor to the construction crew prior to the onset of ground disturbance. Selection of the paleontologist shall be subject to approval of the City of Perris Planning Manager and no grading activities shall occur at the Project site or within offsite Project improvement areas until the paleontologist has been approved by the City.

Monitoring shall be restricted to undisturbed subsurface areas of older Quaternary alluvium, which might be present below the surface. The 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.

Level of Significance After Mitigation

Project impacts to paleontological resources would be less than significant with incorporation of Project-specific mitigation measure MM GEO-1.

4.6.5 Cumulative Impacts

As noted in the foregoing analysis, the potential Project-related impacts related to geology and soils would be considered less than significant with adherence to the City's General Plan policies and implementing measures, compliance with the CBC and City of Perris Building Code, implementation of PVCCSP EIR mitigation measure MM Geo-1, and required incorporation of site-specific geotechnical recommendations contained in the Geotechnical Investigations into the Project design.

With exception of erosion hazards, the effects of geology and soils are inherently restricted to the areas proposed for development and would not contribute to cumulative impacts associated with other existing, planned, or proposed development. For example, development of the Project would not alter geologic events or soil features/characteristics (such as ground shaking, seismic intensity, or soil expansion); therefore, the Project would not affect the level of intensity at which a seismic event on an adjacent site is experienced. However, Project development and future development in the area may expose more persons to seismic hazards. Future development would have potentially significant geology/soils impacts prior to mitigation and would also be required to have site-specific geotechnical investigations prepared to identify the geologic and seismic characteristics on a site and to provide recommendations for engineering design and construction to ensure the structural integrity of proposed development; as required by the City, these recommendations would be incorporated into Project design. Compliance of individual projects with the recommendations of the applicable geotechnical investigation, and adherence to the CBC and City of Perris Building Code would prevent hazards associated with geologic issues (e.g., fault rupture, seismic ground shaking, liquefaction, landslides, unstable soils, expansive soils, and other geologic issues). Therefore, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to geology and soils.

With respect to erosion, as discussed under Threshold b, regulatory requirements mandate that the Project incorporate measures design during construction and long-term operation to ensure that significant erosion impacts do not occur. Other development projects in the vicinity of the Project would be required to comply with the same regulatory requirements as the Project to preclude substantial adverse water and wind erosion impacts. Because the Project and other cumulative projects would be subject to similar mandatory regulatory requirements to control erosion hazards during construction and long-term operation, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to erosion.

Although development activities within the Project area would not impact any known paleontological resources, there is the potential that such resources are buried beneath the surface of the Project area and could be impacted during construction. Other projects within the region would similarly have the potential to impact unknown, subsurface paleontological resources during ground-disturbing activities.

However, implementation of Project-specific mitigation measure MM GEO-1 for the Project, and similar mitigation requirements for development in the City, would ensure the proper identification and subsequent treatment of any paleontological resources that may be encountered during ground-disturbing activities. With implementation of mitigation measure MM GEO-1, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact to paleontological resources.

4.6.6 References

- Albert A. Webb Associates. 2011. Perris Valley Commerce Center Specific Plan Final Environmental Impact Report. November 2011, certified January 10, 2012. Available at: <http://www.cityofperris.org/cityhttps://>.
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4.7 GREENHOUSE GAS EMISSIONS

This section provides a Project-specific greenhouse gas (GHG) emissions analysis, consistent with the requirements of the PVCCSP EIR. The analysis contained in this section is based on the Project's *Greenhouse Gas Analysis* (Urban Crossroads 2023), which is contained in Appendix L of this EIR. The land uses evaluated within the GHG Analysis rely on a previous Project description that would generate more trips, and consequently more emissions compared to the proposed Project. Therefore, the analysis provided presents a conservative analysis of anticipated impacts.

Comments relating to the issue of greenhouse gas emissions were provided by the South Coast Air Quality Management District (SCAQMD) in response to the 2022 NOP. The SCAQMD sent a comment letter with recommendations on the analysis of potential air quality and greenhouse gas impacts from the Project and provided mitigation measures for operational air quality and greenhouse impacts from mobile sources for consideration by the Lead Agency. There were no comments addressing air quality raised at the July 20, 2022 Draft EIR public scoping meeting.

4.7.1 Existing Setting

4.7.1.1 Global Climate Change

Global climate change (GCC) is defined as the change in average meteorological conditions on the Earth with respect to temperature, precipitation, and storms. Most scientists believe that the climate shift that has been in progress since the Industrial Revolution is occurring at a quicker rate and greater magnitude than past climate shifts. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated gases. Scientists believe that the increased rate of climate change is the result of GHGs produced by human activity and industrialization over the past 200 years.

An individual project such as the proposed Project cannot generate enough GHG emissions to produce a discernible change in global climate. However, a project such as the proposed Project may incrementally contribute to GHGs, which when combined with all other sources of GHGs, could influence GCC. Because changes in GHG emissions may have serious environmental consequences, this section will evaluate the potential for the proposed Project to have a significant effect upon the environment as a result of its potential contribution to the greenhouse effect.

4.7.1.2 GHGs and Health Effects

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. For the purposes of this analysis, emissions of CO₂, CH₄, and N₂O were evaluated because these gases are the primary contributors to GCC from development projects. Although other substances such as fluorinated gases also contribute to GCC, these gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases.

The potential health effects related directly to the emissions of CO₂, CH₄, and N₂O as they relate to development projects such as the proposed Project are still being debated in the scientific community. As described in Section 4.7.1.4 below, their cumulative effects on GCC have the potential to cause adverse effects to human health. Increases in Earth's ambient temperatures would result in more

intense heat waves, causing more heat-related deaths. Scientists also purport those higher ambient temperatures would likely lead to more widespread disease. Climate change would likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas (American Lung Association 2022).

4.7.1.3 Global Warming Potential

Different GHGs have different global warming potential (GWP) and atmospheric lifetimes. The Intergovernmental Panel on Climate Change (IPCC) developed the GWP concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of individual GHGs is determined through comparison with the GWP of CO₂. CO₂ has the GWP of one; CH₄ has 28 times the global warming potential of CO₂. CO₂ equivalent (CO₂e) are the emissions of a GHG multiplied by the GWP. The atmospheric lifetime and GWP of selected GHGs are summarized in Table 4.7-1, *GWP and Atmospheric Lifetime of Select Gases*. As shown in the table below from the IPCC's 5th Assessment Report, which assesses GCC, the GWP of the gases evaluated in the IPCC report and discussed in this report in relation to the proposed project range from 1 for CO₂ to 265 for N₂O. The atmospheric lifetimes of these GHGs are up to 121 years.

**Table 4.7-1
GWP AND ATMOSPHERIC LIFETIME OF SELECT GASES**

Gas	Atmospheric Lifetime (Years)	GWP (100-year time horizon)
CO ₂	See*	1
CH ₄	12 .4	28
N ₂ O	121	265

Source: IPCC 2007

*As per Appendix 8.A. of IPCC's 5th Assessment Report, no single lifetime can be given.

4.7.1.4 Effects of Climate Change

Public Health

Higher temperatures may increase the frequency, duration, and intensity of conditions conducive to the formation of air pollution. For example, days with weather conducive to ozone formation could increase from 25 to 25 percent with lower amounts of warming, or 75 to 85 percent under the medium range of warming. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Hotter temperatures lead to more smog, which can damage lungs, and increases childhood asthma, respiratory and heart disease, and death. Air quality could be further compromised by increased wildfires, which emit fine particulate matter that can travel long distances depending on wind conditions. Large wildfires could become up to 55 percent more frequent if GHG emissions are not significantly reduced (California Energy Commission 2006).

In addition, under higher warming range scenarios there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a significant increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory problems caused by extreme

heat. Certain segments of the population are at greater risk, including the elderly, infants, persons with chronic heart or lung disease, people who cannot afford air conditioning, and those who work outdoors.

Water Resources

A vast network of man-made reservoirs and aqueducts captures and transports water from northern California rivers and the Colorado River throughout the state. The current distribution system relies on Sierra Nevada snowpack to supply water during the dry spring and summer months. Under current conditions, the snowpack is created in fall and winter and slowly releases about 15 million acre-feet of water in the spring and summer, when California needs it most. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, and increase the risk of summer water shortages.

If temperatures continue to increase more precipitation could fall as rain instead of snow and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90 percent. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation. It could also adversely affect winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as a month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding.

The State's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta, a major fresh water supply.

Agriculture

Increased temperatures could cause widespread changes to the agriculture industry, which may reduce the quantity and quality of agricultural products statewide. First, California farmers could possibly lose as much as 25 percent of the water supply needed due to GCC. Although higher CO₂ levels can stimulate plant production and increase plant water-use efficiency, California's farmers could face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development could change, as could the intensity and frequency of pest and disease outbreaks. Rising temperatures could aggravate ozone pollution, which makes plants more susceptible to disease and pests which can interfere with plant growth. Because California feeds not only its own residents, but the entire U.S. and other countries as well, production declines could lead to food shortages and higher prices.

Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a certain point. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures could worsen the quantity and quality of yield for many of California's agricultural products. Products likely to be most affected include wine grapes, fruits, and nuts.

In addition, continued GCC could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Many species could experience range expansion, while less-rapidly evolving species with significant established populations could experience range contractions.

Should range contractions occur, new or different weed species could fill the emerging gaps in vegetation. Continued GCC could alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates.

Forests and Landscapes

GCC has the potential to threaten forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range the risk of large wildfires in California could increase by as much as 55 percent, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks would not be uniform throughout the state. In contrast, wildfires in northern California could increase by up to 90 percent due to decreased precipitation.

Moreover, continued GCC has the potential to alter natural ecosystems and biological diversity within the state. For example, alpine and subalpine ecosystems could decline by as much as 60 to 80 percent by the end of the century because of increasing temperatures. The productivity of the state's forests has the potential to decrease because of GCC.

Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures due to GCC could increasingly threaten the state's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12 to 14 inches.

4.7.2 Existing Policies and Regulations

4.7.2.1 International

IPCC

In 1988, the United Nations (U.N.) and the World Meteorological Organization established the IPCC to assess the scientific, technical, and socioeconomic information relevant to understanding the scientific basis of risk of human-induced climate change, its potential impacts, and options for adaptation and mitigation.

United Nation's Framework Convention on Climate Change

On March 21, 1994, the U.S. joined a number of countries around the world in signing the UNFCCC. Under the UNFCCC, governments gather and share information on GHG emissions, national policies, and best practices; launch national strategies for addressing GHG 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.

International Climate Change Treaties

The Kyoto Protocol is an international agreement linked to the UNFCCC. The major feature of the Kyoto Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions at an average of 5 percent against 1990 levels over the five-year period 2008–2012. The Convention (as discussed above) encouraged industrialized countries to stabilize emissions; however, the Protocol commits them to do so. Developed countries have contributed more emissions over the last 150 years; therefore, the Protocol places a heavier burden on developed nations under the principle of “common but differentiated responsibilities.”

In 2001, President George W. Bush indicated that he would not submit the treaty to the U.S. Senate for ratification, which effectively ended American involvement in the Kyoto Protocol. In December 2009, international leaders met in Copenhagen to address the future of international climate change commitments post-Kyoto. No binding agreement was reached in Copenhagen; however, the UN Climate Change Committee identified the long-term goal of limiting the maximum global average temperature increase to no more than 2 degrees Celsius (°C) above pre-industrial levels, subject to a review in 2015. The Committee held additional meetings in Durban, South Africa in November 2011; Doha, Qatar in November 2012; and Warsaw, Poland in November 2013. The meetings gradually gained consensus among participants on individual climate change issues.

On September 23, 2014, more than 100 Heads of State and Government and leaders from the private sector and civil society met at the Climate Summit in New York hosted by the U.N. At the Summit, heads of government, business and civil society announced actions in areas that would have the greatest impact on reducing emissions, including climate finance, energy, transport, industry, agriculture, cities, forests, and building resilience.

Parties to the UNFCCC reached a landmark agreement on December 12, 2015, in Paris, charting a fundamentally new course in the two-decade-old global climate effort. Culminating a four-year negotiating round, the new treaty ends the strict differentiation between developed and developing countries that characterized earlier efforts, replacing it with a common framework that commits all countries to put forward their best efforts and to strengthen them in the years ahead. This includes, for the first time, requirements that all parties report regularly on their emissions and implementation efforts and undergo international review.

The agreement and a companion decision by parties were the key outcomes of the conference, known as the 21st session of the UNFCCC Conference of the Parties (COP) 21. Together, the Paris Agreement and the accompanying COP decision:

- Reaffirm the goal of limiting global temperature increase well below 2°C, while urging efforts to limit the increase to 1.5 degrees;
- Establish binding commitments by all parties to make “nationally determined contributions” (NDCs), and to pursue domestic measures aimed at achieving them;
- Commit all countries to report regularly on their emissions and “progress made in implementing and achieving” their NDCs, and to undergo international review;
- Commit all countries to submit new NDCs every five years, with the clear expectation that they would “represent a progression” beyond previous ones;

- Reaffirm the binding obligations of developed countries under the UNFCCC to support the efforts of developing countries, while for the first time encouraging voluntary contributions by developing countries too;
- Extend the current goal of mobilizing \$100 billion a year in support by 2020 through 2025, with a new, higher goal to be set for the period after 2025;
- Extend a mechanism to address “loss and damage” resulting from climate change, which explicitly would not “involve or provide a basis for any liability or compensation;”
- Require parties engaging in international emissions trading to avoid “double counting;” and
- Call for a new mechanism, similar to the Clean Development Mechanism under the Kyoto Protocol, enabling emission reductions in one country to be counted toward another country’s NDC (C2ES 2015).

Following President Biden’s day one executive order, the United States officially rejoined the landmark Paris Agreement on February 19, 2021, positioning the country to once again be part of the global climate solution. Meanwhile, city, state, business, and civic leaders across the country and around the world have been ramping up efforts to drive the clean energy advances needed to meet the goals of the agreement and put the brakes on dangerous climate change.

4.7.2.2 Federal

Supreme Court Ruling in *Massachusetts et al v. Environmental Protection Agency*

In *Massachusetts et al. v. Environmental Protection Agency*, decided on April 2, 2007, the United States Supreme Court (Supreme Court) found that four GHGs, including CO₂, are air pollutants subject to regulation under Section 202(a)(1) of the Clean Air Act (CAA). The Supreme Court held that the USEPA Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the USEPA Administrator signed two distinct findings regarding GHGs under section 202(a) of the CAA:

- **Endangerment Finding:** The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs— CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆—in the atmosphere threaten the public health and welfare of current and future generations.
- **Cause or Contribute Finding:** The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles, as discussed in the section “Clean Vehicles” below. After a lengthy legal challenge, the Supreme Court declined to review an Appeals Court ruling that upheld the USEPA Administrator’s findings (USEPA 2020).

Clean Vehicle Standards

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 U.S. On April 1, 2010, the USEPA, and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) announced a joint final rule establishing a national program that would reduce GHG emissions and improve fuel economy for new cars and trucks sold in the U.S.

The first phase of the national program applies to passenger cars, light-duty trucks, and medium-duty (MD) passenger vehicles, covering model years 2012 through 2016. They require these vehicles to meet an estimated combined average emissions level of 250 grams of CO₂ per mile, equivalent to 35.5 miles per gallon (mpg) if the automobile industry were to meet this CO₂ level solely through fuel economy improvements. Together, these standards would cut CO₂ emissions by an estimated 960 MMT and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012–2016). The USEPA and the NHTSA issued final rules on a second-phase joint rulemaking establishing national standards for light-duty vehicles for model years 2017 through 2025 in August 2012. The new standards for model years 2017 through 2025 apply to passenger cars, light-duty trucks, and MD passenger vehicles. The final standards are projected to result in an average industry fleetwide level of 163 grams per mile of CO₂ in model year 2025, which is equivalent to 54.5 mpg if achieved exclusively through fuel economy improvements.

The USEPA and the U.S. DOT issued final rules for the first national standards to reduce GHG emissions and improve fuel efficiency of heavy-duty trucks (HDT) and buses on September 15, 2011, effective November 14, 2011. 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 CO₂ emissions and fuel consumption by the 2018 model year. For HDT 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 a 15 percent reduction for diesel vehicles by the 2018 model year (12 and 17 percent respectively if accounting for air conditioning leakage). Lastly, for vocational vehicles, the engine and vehicle standards would achieve up to a 10 percent reduction in fuel consumption and CO₂ emissions from the 2014 to 2018 model years.

On April 2, 2018, the USEPA signed the Mid-term Evaluation Final Determination, which declared that the model year 2022–2025 GHG standards are not appropriate and should be revised (Federal Register 2018). This Final Determination serves to initiate a notice to further consider appropriate standards for MY 2022–2025 light-duty vehicles. On August 2, 2018, the NHTSA in conjunction with the USEPA, released a notice of proposed rulemaking, the *Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks* (SAFE Vehicles Rule). The SAFE Vehicles Rule was proposed to amend existing Corporate Average Fuel Economy (CAFE) and tailpipe CO₂ standards for passenger cars and light trucks and to establish new standards covering model years 2021 through 2026. As of March 31, 2020, the NHTSA and USEPA finalized the SAFE Vehicle Rule which increased stringency of CAFE and CO₂ emissions standards by 1.5 percent each year through model year 2026 (36). However, on March 14, 2022, the USEPA rescinded the SAFE Vehicles Rule, once again allowing California to enforce its own GHG emissions standards.

Mandatory Reporting of GHGs

The Consolidated Appropriations Act of 2008, passed in December 2007, requires the establishment of mandatory GHG reporting requirements. On September 22, 2009, the USEPA issued the Final Mandatory Reporting of GHGs Rule, which became effective January 1, 2010. The rule requires reporting of GHG emissions from large sources and suppliers in the U.S. and is intended to collect accurate and timely emissions data to inform future policy decisions. Under the rule, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons per year (MT/yr) or more of GHG emissions are required to submit annual reports to the USEPA.

New Source Review

The USEPA issued a final rule on May 13, 2010, that establishes thresholds for GHGs that define when permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities. This final rule “tailors” the requirements of these CAA permitting programs to limit which facilities would be required to obtain Prevention of Significant Deterioration and Title V permits. In the preamble to the revisions to the Federal Code of Regulations, the USEPA states:

“This rulemaking is necessary because without it the Prevention of Significant Deterioration and Title V requirements would apply, as of January 2, 2011, at the 100 or 250 tons per year levels provided under the CAA, greatly increasing the number of required permits, imposing undue costs on small sources, overwhelming the resources of permitting authorities, and severely impairing the functioning of the programs. USEPA is relieving these resource burdens by phasing in the applicability of these programs to GHG sources, starting with the largest GHG emitters. This rule establishes two initial steps of the phase-in. The rule also commits the agency to take certain actions on future steps addressing smaller sources but excludes certain smaller sources from Prevention of Significant Deterioration and Title V permitting for GHG emissions until at least April 30, 2016.”

The USEPA estimates that facilities responsible for nearly 70 percent of the national GHG emissions from stationary sources would be subject to permitting requirements under this rule. This includes the nation’s largest GHG emitters—power plants, refineries, and cement production facilities.

Cap-and-Trade

Cap-and-trade refers to a policy tool where emissions are limited to a certain amount and can be traded and 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 CO₂ emissions from power plants, auctions CO₂ 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 as of 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 percent 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 percent below the 1990 level by 2030.

SmartWay Program

The SmartWay Program is a public-private initiative between the USEPA, 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 (USEPA 2017):

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 lower emissions.
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 would 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 percent or more fuel savings over traditional trailers.

Through the SmartWay Technology Program, the USEPA 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 USEPA 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 the amount 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 would 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.

Executive Order 13990

On January 20, 2021, Federal agencies were directed to immediately review, and take action to address, Federal regulations promulgated and other actions taken during the last 4 years that conflict with national objectives to improve public health and the environment; ensure access to clean air and water; limit exposure to dangerous chemicals and pesticides; hold polluters accountable, including those who disproportionately harm communities of color and low-income communities; reduce greenhouse gas emissions; bolster resilience to the impacts of climate change; restore and expand our national treasures and monuments; and prioritize both environmental justice and employment.

4.7.2.3 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 the legislation.

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 met¹). GHGs as defined under AB 32 include CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆. 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 human health-related problems.”

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 MMT CO₂e. This is less than the 2020 emissions target of 431 MMT CO₂e.

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, emitting over 40 percent of the total GHG emissions in California. SB 375 states, “Without improved land use and transportation policy, California would 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 implementation of the strategies.

SB 375 requires MPOs to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while considering 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. 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:

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

AB 1493 - Pavley Fuel Efficiency Standards

Enacted on July 22, 2002, California AB 1493, also known as the Pavley Fuel Efficiency Standards, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the USEPA’s denial of an implementation waiver. The USEPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011.

The standards phase in during the 2009 through 2016 MY. Several technologies stand out as providing significant reductions in emissions at favorable costs. These include discrete variable valve lift or camless valve actuation to optimize valve operation rather than relying on fixed valve timing and lift as has historically been done; turbocharging to boost power and allow for engine downsizing; improved multi-speed transmissions; and improved air conditioning systems that operate optimally, leak less, and/or use an alternative refrigerant.

The second phase of the implementation for the Pavley bill was incorporated into Amendments to the Low-Emission Vehicle Program (LEV III) or the Advanced Clean Cars (ACC) program. The ACC program combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for MY 2017 through 2025. The regulation would reduce GHGs from new cars by 34

percent from 2016 levels by 2025. The new rules would clean up gasoline and diesel-powered cars, and deliver increasing numbers of zero-emission technologies, such as full battery electric cars, newly emerging plug-in hybrid electric vehicles (EV) and hydrogen fuel cell cars. The package would also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California.

Clean Energy and Pollution Reduction Act of 2015

In October 2015, the legislature approved, and Governor Jerry Brown signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for EV charging stations. Provisions for a 50 percent reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

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

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 percent 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 percent below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature (California Legislative Information 2016).

CARB 2017 Scoping Plan

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 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard (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 MMT CO₂e for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030 (CARB 2017).

California's climate strategy would require contributions from all sectors of the economy, including the land base, and would 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 carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (CH₄, 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 would 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 Plan* framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing zero-emission vehicles (ZEV) buses and trucks.
- LCFS, with an increased stringency (18 percent by 2030).
- Implementing SB 350, which expands the RPS to 50 percent RPS and doubles energy efficiency 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 percent and anthropogenic black carbon emissions by 50 percent by year 2030.
- Continued implementation of SB 375.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- 20 percent reduction in GHG emissions from refineries by 2030.
- Development of a Natural and Working Lands Action Plan to secure California's land base 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."

In addition to the statewide strategies listed above, the *2017 Scoping Plan* also identifies local governments as essential partners in achieving the State's long-term GHG reduction goals and identifies local actions to reduce GHG emissions. As part of the recommended actions, CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 metric tons

of CO₂e (MT CO₂e) or less per capita by 2030 and 2 MT CO₂e or less per capita by 2050. For CEQA projects, CARB states that lead agencies may develop evidence-based bright-line numeric thresholds—consistent with the *2017 Scoping Plan* and the State’s long-term GHG goals—and projects with emissions over that amount may be required to incorporate on-site design features and mitigation measures that avoid or minimize project emissions to the degree feasible; or a performance-based metric using a CAP or other plan to reduce GHG emissions is appropriate.

According to research conducted by the Lawrence Berkeley National Laboratory (LBNL) and supported by CARB, California, under its existing and proposed GHG reduction policies, could achieve the 2030 goals under SB 32. The research utilized a new, validated model known as the California LBNL GHG Analysis of Policies Spreadsheet (CALGAPS), which simulates GHG and criteria pollutant emissions in California from 2010 to 2050 in accordance to existing and future GHG-reducing policies. The CALGAPS model showed that by 2030, emissions could range from 211 to 428 MT CO₂e per year (MT CO₂e/yr), indicating that “even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40 percent below the 1990 level [of SB 32].” CALGAPS analyzed emissions through 2050 even though it did not generally account for policies that might be put in place after 2030. Although the research indicated that the emissions would not meet the State’s 80 percent reduction goal by 2050, various combinations of policies could allow California’s cumulative emissions to remain very low through 2050 (Lawrence Berkeley National Laboratory 2015).

2022 CARB Scoping Plan

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) (CARB 2022). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85 percent below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to “deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor.” The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with CEQA Guidelines section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation - the regulations that will impact this sector are adopted and enforced by CARB on vehicle manufacturers and outside the jurisdiction and control of local governments. As stated in the Plan’s executive summary:

“The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on and accelerating carbon reduction programs that have been in place for a decade and a half. That means rapidly moving to zero-emission transportation; electrifying the cars, buses, trains, and trucks that now constitute California’s single largest source of planet-warming pollution.”

“[A]pproval of this plan catalyzes a number of efforts, including the development of new regulations as well as amendments to strengthen regulations and programs already in place, not just at CARB but across state agencies.”

Under the 2022 Scoping Plan, the State will lead efforts to meet the 2045 carbon neutrality goal through implementation of the following objectives:

- Reimagine roadway projects that increase VMT in a way that meets community needs and reduces the need to drive.
- Double local transit capacity and service frequencies by 2030.
- Complete the High-Speed Rail (HSR) System and other elements of the intercity rail network by 2040.
- Expand and complete planned networks of high-quality active transportation infrastructure.
- Increase availability and affordability of bikes, e-bikes, scooters, and other alternatives to light-duty vehicles, prioritizing needs of underserved communities.
- Shift revenue generation for transportation projects away from the gas tax into more durable sources by 2030.
- Authorize and implement roadway pricing strategies and reallocate revenues to equitably improve transit, bicycling, and other sustainable transportation choices.
- Prioritize addressing key transit bottlenecks and other infrastructure investments to improve transit operational efficiency over investments that increase VMT.
- Develop and implement a statewide transportation demand management (TDM) framework with VMT mitigation requirements for large employers and large developments.
- Prevent uncontrolled growth of autonomous vehicle (AV) VMT, particularly zero-passenger miles.
- Channel new mobility services towards pooled use models, transit complementarity, and lower VMT outcomes.
- Establish an integrated statewide system for trip planning, booking, payment, and user accounts that enables efficient and equitable multimodal systems.
- Provide financial support for low-income and disadvantaged Californians' use of transit and new mobility services.
- Expand universal design features for new mobility services.
- Accelerate infill development in existing transportation-efficient places and deploy strategic resources to create more transportation-efficient locations.
- Encourage alignment in land use, housing, transportation, and conservation planning in adopted regional plans (RTP/SCS and RHNA) and local plans (e.g., general plans, zoning, and local transportation plans).

- Accelerate production of affordable housing in forms and locations that reduce VMT and affirmatively further fair housing policy objectives.
- Reduce or eliminate parking requirements (and/or enact parking maximums, as appropriate) and promote redevelopment of excess parking, especially in infill locations.
- Preserve and protect existing affordable housing stock and protect existing residents and businesses from displacement and climate risk.

Included in the 2022 Scoping Plan is a set of local actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on residential and mixed-use projects, in fact CARB states in Appendix D (page 4): "...focuses primarily on climate action plans (CAPs) and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting."

Additionally on Page 21 in Appendix D, CARB states: "The recommendations outlined in this section apply only to residential and mixed-use development project types. California currently faces both a housing crisis and a climate crisis, which necessitates prioritizing recommendations for residential projects to address the housing crisis in a manner that simultaneously supports the State's GHG and regional air quality goals. CARB plans to continue to explore new approaches for other land use types in the future." As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development.

Cap-and-Trade Program

The *2017 Scoping Plan* identifies a Cap-and-Trade Program as one of the key strategies for California to reduce GHG emissions. According to CARB, a cap-and-trade program would help put California on the path to meet its goal of achieving a 40 percent reduction in GHG emissions from 1990 levels by 2030. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap would be able to trade permits to emit GHGs within the overall limit.

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from regulated entities by more than 16 percent between 2013 and 2020, and by an additional 40 percent by 2030. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and would decline over time, achieving GHG emission reductions throughout the program's duration.

Covered entities that emit more than 25,000 MT CO₂e/yr must comply with the Cap-and-Trade Program. Triggering of the 25,000 MT CO₂e/yr "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of GHG Emissions (Mandatory Reporting Rule or "MRR").

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender “compliance instruments” for each MT CO₂e of GHG they emit. There also are requirements to surrender compliance instruments covering 30 percent of the prior year’s compliance obligation by November of each year (CARB 2019a).

The Cap-and-Trade Program provides a firm cap, which provides the highest certainty of achieving the 2030 target. An inherent feature of the Cap-and-Trade program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. As summarized by CARB in the *First Update to the Climate Change Scoping Plan*:

“The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced. In other words, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program if there is a reduction in GHG emissions from other covered entities. Such a focus on aggregate GHG emissions is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative” (CARB 2014).

The Cap-and-Trade Program covers approximately 80 percent of California’s GHG emissions (CARB 2017). The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects’ electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program’s first compliance period. The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported.

California Regulations and Building Codes

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California’s energy consumption relatively flat even with rapid population growth.

Title 20 CCR Sections 1601 et seq. – Appliance Efficiency Regulations

The Appliance Efficiency Regulations regulate the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. 23 categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles (RV) or other mobile equipment (CEC 2022).

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

California Code of Regulations (CCR) Title 24 Part 6: 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 August 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 2022 California Green Building Code Standards that became effective on January 1, 2023. The CEC anticipates that the 2022 energy code will provide \$1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons (CEC 2021). The Project would be required to comply with the applicable standards in place at the time building permit document submittals are made. These require the following nonresidential mandatory measures, among other items (California Department of General Services 2022): 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 percent of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- 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 as shown in Table 5.106.5.2 (5.106.5.2).
- 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 for the future load. The number of spaces to be provided for is contained in Table 5.106.5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, upright and glare ratings per Table 5.106.8 (5.106.8).

- Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- 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 more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - Water closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
 - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallon per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
 - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combined flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
 - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute at 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallon per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- Outdoor potable water uses 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 Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- 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 tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).

- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 square feet. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).
- 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 that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

CARB Refrigerant Management Program

CARB adopted a regulation in 2009 to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is set forth in sections 95380 to 95398 of Title 17, CCR. The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with refrigeration systems with more than 50 pounds of a high GWP refrigerant. The refrigerant management program is designed to (1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and (3) verify GHG emission reductions.

Tractor-Trailer GHG Regulation

The tractors and trailers subject to this regulation must either use USEPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. 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 HD tractors that pull them on California highways. These owners are responsible for replacing or retrofitting their affected vehicles with compliant aerodynamic technologies and low rolling resistance tires. Sleeper cab tractors model year 2011 and later must be SmartWay certified. All other tractors must use SmartWay verified low rolling resistance tires. There are also requirements for trailers to have low rolling resistance tires and aerodynamic devices.

Phase I and 2 Heavy-Duty Vehicle GHG Standards

In September 2011, CARB adopted a regulation for GHG emissions from HDTs and engines sold in California. It establishes GHG emission limits on truck and engine manufacturers and harmonizes with the USEPA rule for new trucks and engines nationally. Existing HD vehicle regulations in California include engine criteria emission standards, tractor-trailer GHG requirements to implement SmartWay strategies (i.e., the Heavy-Duty Tractor-Trailer GHG Regulation), and in-use fleet retrofit requirements such as the Truck and Bus Regulation. The USEPA rule has compliance requirements for new compression and spark ignition engines, as well as trucks from Class 2b through Class 8. Compliance requirements began with MY 2014 with stringency levels increasing through MY 2018. The rule organizes truck compliance into three groupings, which include a) HD pickups and vans; b) vocational vehicles; and c) combination tractors. The USEPA rule does not regulate trailers.

CARB staff has worked jointly with the USEPA and the NHTSA on the next phase of federal GHG emission standards for medium-duty trucks (MDT) and HDT vehicles, called federal Phase 2. The federal Phase 2 standards were built on the improvements in engine and vehicle efficiency required by the Phase 1 emission standards and represent a significant opportunity to achieve further GHG reductions for 2018

and later MY HDT vehicles, including trailers. The USEPA and NHTSA have proposed to roll back GHG and fuel economy standards for cars and light-duty trucks, which suggests a similar rollback of Phase 2 standards for MDT and HDT vehicles may be pursued.

SB 97 and the CEQA Guidelines Update

Passed in August 2007, SB 97 added Section 21083.05 to the Public Resources Code. The code states “(a) On or before July 1, 2009, the Office of Planning and Research (OPR) shall prepare, develop, and transmit to the Resources Agency guidelines for the mitigation of GHG emissions or the effects of GHG emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption. (b) On or before January 1, 2010, the Resources Agency shall certify and adopt guidelines prepared and developed by the OPR pursuant to subdivision (a).”

In 2012, Public Resources Code Section 21083.05 was amended to state:

“The Office of Planning and Research and the Natural Resources Agency shall periodically update the guidelines for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption, to incorporate new information or criteria established by the State Air Resources Board pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code.”

On December 28, 2018, the Natural Resources Agency announced the OAL approved the amendments to the *State CEQA Guidelines* for implementing CEQA. The CEQA Amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents. The CEQA Amendments fit within the existing CEQA framework by amending the State CEQA Guidelines to reference climate change.

Section 15064.4 was added the State CEQA Guidelines and states that in determining the significance of a project’s GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project’s emissions to the effects of climate change. A project’s incremental contribution may be cumulatively considerable even if it appears relatively insignificant compared to statewide, national, or global emissions. The agency’s analysis should consider a timeframe that is appropriate for the project. The agency’s analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. Additionally, a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project’s incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use (AEP 2018).

4.7.2.4 Executive Orders Related to GHG Emissions

California’s Executive Branch has taken several actions to reduce GHGs through the use of Executive Orders. Although not regulatory, they set the tone for the state and guide the actions of state agencies.

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 percent below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that would 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.

Executive Order S-01-07

Governor Schwarzenegger signed Executive Order S-01-07 on January 18, 2007. The order mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. CARB adopted the LCFS on April 23, 2009.

The LCFS was challenged in the U.S. District Court in Fresno in 2011. The court's ruling issued on December 29, 2011, included a preliminary injunction against CARB's implementation of the rule. The Ninth Circuit Court of Appeals stayed the injunction on April 23, 2012, pending final ruling on appeal, allowing CARB to continue to implement and enforce the regulation. The Ninth Circuit Court's decision, filed September 18, 2013, vacated the preliminary injunction. In essence, the court held that LCFS adopted by CARB were not in conflict with federal law. On August 8, 2013, the Fifth District Court of Appeal (California) ruled CARB failed to comply with CEQA and the Administrative Procedure Act (APA) when adopting regulations for LCFS. In a partially published opinion, the Court of Appeal reversed the trial court's judgment and directed issuance of a writ of mandate setting aside Resolution 09-31 and two executive orders of CARB approving LCFS regulations promulgated to reduce GHG emissions. However, the court tailored its remedy to protect the public interest by allowing the LCFS regulations to remain operative while CARB complies with the procedural requirements it failed to satisfy.

To address the Court ruling, CARB was required to bring a new LCFS regulation to the Board for consideration in February 2015. The proposed LCFS regulation was required to contain revisions to the 2010 LCFS as well as new provisions designed to foster investments in the production of the low-carbon intensity fuels, offer additional flexibility to regulated parties, update critical technical information, simplify, and streamline program operations, and enhance enforcement. On November 16, 2015, the Office of Administrative Law (OAL) approved the Final Rulemaking Package. The new LCFS regulation became effective on January 1, 2016.

In 2018, CARB approved amendments to the regulation, which included strengthening the carbon intensity benchmarks through 2030 in compliance with the SB 32 GHG emissions reduction target for 2030. The amendments included crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector (CARB 2019b).

Executive Order S-13-08

Executive Order S-13-08 states that “climate change in California during the next century is expected to shift precipitation patterns, accelerate sea level rise and increase temperatures, thereby posing a serious threat to California’s economy, to the health and welfare of its population and to its natural resources.” Pursuant to the requirements in the Order, the *2009 California Climate Adaptation Strategy* (CNRA 2009) was adopted, which is the “...first statewide, multi-sector, region-specific, and information-based climate change adaptation strategy in the United States.” Objectives include analyzing risks of climate change in California, identifying, and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order B-30-15

On April 29, 2015, Governor Brown issued an executive order to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. The Governor’s executive order aligned California’s GHG reduction targets with those of leading international governments ahead of the U.N. Climate Change Conference in Paris late 2015. The Order sets a new interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030 in order to ensure California meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050 and directs CARB to update the *2017 Scoping Plan* to express the 2030 target in terms of MMT CO₂e. The Order also requires the state’s climate adaptation plan to be updated every three years, and for the State to continue its climate change research program, among other provisions. As with Executive Order S-3-05, this Order is not legally enforceable to local governments and the private sector. Legislation that would update AB 32 to make post 2020 targets and requirements a mandate is in process in the State Legislature.

Executive Order B-55-18 and SB 100

SB 100 and Executive Order B-55-18 were signed by Governor Brown on September 10, 2018. Under the existing RPS, 25 percent of retail sales of electricity are required to be from renewable sources by December 31, 2016, 33 percent by December 31, 2020, 40 percent by December 31, 2024, 45 percent by December 31, 2027, and 50 percent by December 31, 2030. SB 100 raises California’s RPS requirement to 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours (kWh) of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency (CNRA), California USEPA (CalEPA), the California Department of Food and Agriculture (CDFA), and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

Executive Order N-79-20

Establishes the State’s goal that 100 percent of in-state sales of new passenger cars and trucks be zero emission by 2035; directs CARB to develop and propose regulations to accomplish this goal, acting consistently with technical feasibility and cost-effectiveness; advances strategies for a just economic transition away from fossil fuels; and declares that the State must prioritize clean transportation

solutions that are accessible to all Californians, particularly those who are low income or experience a disproportionate share of pollution. As excerpted from the Resolution cited below.

Resolution 22-22 Advanced Clean Cars II Regulations

Sections 39600 and 39601 of the Health and Safety Code authorize the California Air Resources Board (CARB or Board) to adopt standards, rules and regulations and to do such acts as may be necessary for the proper execution of the powers and duties granted to and imposed upon the Board by law; CARB has effectively made the sale of Gas-powered vehicles illegal by 2035.

4.7.2.5 Regional

The Project site is within the South Coast Air Basin, which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

SCAQMD

The SCAQMD is the agency responsible for air quality planning and regulation in the SCAB. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions.

In 2008, the 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. In December 2008, the SCAQMD adopted an interim 10,000 MT CO₂e per year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. The Working Group has also developed several different options that are contained in the SCAQMD Draft Guidance Document–Interim CEQA GHG Significance Threshold, which could be considered for industrial and non-industrial development projects. The most recent proposal issued in September 2010 uses the following tiered approach to evaluate potential GHG impacts from various uses. However, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current interim thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:

- Industrial land use: 10,000 MT CO₂e/yr
- Option 1: Based on land use type: residential: 3,500 MT CO₂e/yr; commercial: 1,400 MT CO₂e/yr; or mixed-use: 3,000 MT CO₂e/yr
- Option 2: Residential and commercial land use: 3,000 MT CO₂e/yr
- Tier 4 has the following options:
 - Option 1: Reduce Business-as-Usual (BAU) emissions by a certain percentage; this percentage is currently undefined.
 - Option 2: Early implementation of applicable AB 32 Scoping Plan measures
 - Option 3: 2020 target for service populations (SP), which includes residents and employees: 4.8 MT CO₂e per SP per year for projects and 6.6 MT CO₂e per SP per year for plans;
 - Option 3: 2035 target: 3.0 MT CO₂e per SP per year for projects and 4.1 MT CO₂e per SP per year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO₂ concentrations at 450 ppm, thus stabilizing global climate.

The thresholds identified above have not been adopted by the SCAQMD or distributed for widespread public review and comment, and the working group tasked with developing the thresholds has not met since September 2010. The future schedule and likelihood of threshold adoption is uncertain. The only update to the SCAQMD's GHG thresholds since 2010 is that the 10,000 MT CO₂e/yr threshold for industrial projects is now included in the SCAQMD's March 2023 South Coast AQMD Air Quality Significance Thresholds document that is published for use by local agencies.

In the absence of other thresholds of significance promulgated by the SCAQMD, the City of Perris has been using the SCAQMD's 10,000 MT CO₂e/yr threshold for industrial projects and the draft thresholds for non-industrial projects the purpose of evaluating the GHG impacts associated with proposed general development projects. As stated above, SCAQMD staff were proposing to recommend the 10,000 MT CO₂e/yr threshold for industrial uses by all lead agencies. The City's use of the 10,000 MT CO₂e/yr threshold is also considered to be conservative since it is being applied to all of the GHG emissions generated by the Project (i.e., area sources, energy sources, vehicular sources, solid waste sources, and water sources) whereas the SCAQMD's 10,000 MT CO₂e/yr threshold applies only to the new stationary sources generated at industrial facilities. However, the SCAQMD has not identified a potential threshold of significance for projects that include a mix of industrial and non-industrial uses such as are proposed for the proposed Project. In this case, the threshold selected by the City for this project is 3,000 MT CO₂e/yr because the existing planning designation for the site is Commercial and the Project includes both commercial and industrial uses.

The SCAQMD only has authority over GHG emissions from development projects that include air quality permits. At this time, it is unknown if the project would include stationary sources of emissions subject

to SCAQMD permits. Notwithstanding, if the Project requires a stationary permit, it would be subject to the applicable SCAQMD regulations. SCAQMD Regulation XXVII, adopted in 2009 includes the following rules:

- Rule 2700 defines terms and post global warming potentials.
- Rule 2701, SoCal Climate Solutions Exchange, establishes a voluntary program to encourage, quantify, and certify voluntary, high quality certified GHG emission reductions in the SCAQMD.
- Rule 2702, GHG Reduction Program created a program to produce GHG emission reductions within the SCAB. The SCAQMD would fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

4.7.2.6 Local

City of Perris Climate Action Plan

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. 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 based on 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 percent below 2010 levels, and the 2035 reduction target is 47.5 percent 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 percent below 1990 levels by 2050.

4.7.2.7 Applicable PVCCSP Mitigation Measures

The Project site is located within the PVCCSP planning area. As such, and unless otherwise noted, the Project is required to comply with the following applicable *PVCCSP EIR* mitigation measures (MMs). The applicable PVCCSP EIR mitigation measures for air quality are shown below and are required for the Project. Additionally, these select measures, as disclosed in the EIR, would also reduce GHG emissions. As a conservative measure, to provide a worst-case disclosure of the Project's impacts, no reduction in emissions has been assumed from the following PVCCSP EIR mitigation measures where indicated.

The PVCCSP EIR contains the following air quality mitigation measures for the PVCCSP and implementing projects:

- 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.

- 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 of Perris' Building Division prior to issuance of grading permits.
- 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 PuriNO_x 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.
- MM Air 7** During construction, ozone (O₃) 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.
- 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.
- For purposes of analysis, the GHG emissions estimates presented do not reflect emission reductions that would result from implementation of this PVCCSP EIR mitigation measure.*
- 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.
- For purposes of analysis, the GHG emissions estimates presented do not reflect emission reductions that would result from implementation of this PVCCSP EIR mitigation measure.*
- 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, On-road Heavy Duty Voucher Incentive Program (VIP), Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP), and Surplus Off-Road Opt-in

for NO_x (SOON) funding programs, as identified on SCAQMD's website (<http://www.aqmd.gov>). Tenants would be required to use those funds, if awarded.

For purposes of analysis, the GHG emissions estimates presented do not reflect emissions reductions that would result from implementation of this PVCCSP EIR mitigation measure.

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.

For purposes of analysis, the GHG emissions estimates presented do not reflect emissions reductions that would result from implementation of this PVCCSP EIR mitigation measure.

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 sites 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 Americans with Disabilities Act (ADA)-compliant paths to the major building entrances in the project.

For purposes of analysis, the estimated Project-generated emissions presented do not reflect emission reductions that would occur with implementation of this PVCCSP EIR mitigation measure since emissions reductions from this measure are not readily quantifiable.

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 sites. 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.

For purposes of analysis, the GHG emissions estimates presented do not reflect emissions reductions that would result from implementation of this MM.

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 would be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.

For purposes of analysis, the GHG emissions estimates presented do not reflect emissions reductions that would result from implementation of this MM.

4.7.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, a significant greenhouse gas impact would occur if implementation of the proposed project would result in any of the following:

- a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The City of Perris has been using the SCAQMD's 10,000 MT CO₂e/yr threshold for industrial projects and the draft thresholds for non-industrial projects the purpose of evaluating the GHG impacts associated with proposed general development projects. In the case of this particular Project, the City as the lead agency has decided to use a more conservative approach and is utilizing a threshold of 3,000 MT CO₂e/yr for the analysis in this EIR. The City, as the CEQA lead agency is using the 3000 MT CO₂e/yr threshold because the existing planning designation for the site is Commercial and the Project includes commercial industrial land uses. However, the City continues that the use of this threshold for this particular Project does not change the City's current practice of using the SCAQMD's 10,000 MT CO₂e/yr threshold for other industrial projects.

4.7.4 Environmental Impacts

Threshold a: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact Analysis

As discussed in the Greenhouse Gas Analysis for this project (Appendix L), the Project would result in approximately 2,264.90 MT CO₂e yr from construction, energy, on-site equipment, waste, and water usage. In addition, the Project has the potential to result in an additional 22,349.00 MT CO₂e/yr from mobile sources if the assumption is made that all of the vehicle trips to and from the Project are "new" trips resulting from the development of the Project. As such, the Project has the potential to generate a total of approximately 24,617.67 MT CO₂e/yr, as shown in Table 4.7-2, *Project GHG Emissions*.

**Table 4.7-2
PROJECT GHG EMISSIONS**

Emission Source	Emissions (MT/year)				
	CO ₂	CH ₄	N ₂ O	R	Total CO ₂ e
Annual construction-related emissions amortized over 30 years	64.40	0.00	0.01	0.07	66.00
Mobile	21,821.00	0.78	1.59	36.10	22,349.00
Area	17.10	< 0.005	< 0.005	0	17.60
Energy	1,169.00	0.11	0.01	0	1,175.00
Water	273.00	6.31	0.15	0	475.00
Waste	108.00	10.80	0	0	379.00
Refrigerants	0	0	0	10.20	10.20
Emergency Fire Pumps	3.76	< 0.005	< 0.005	0	3.77
On-Site Equipment	0	0	0	0	142.1
Total CO₂e (All Sources)	24,617.67				

As such, the Project would exceed the 3,000 MT CO₂e/yr threshold of significance used for this analysis. Thus, the Project would result in a significant impact with respect to GHG emissions.

Mitigation Measures

The Project is required to comply with the applicable PVCCSP EIR mitigation measures described in Section 4.7.2.7. In addition to the PVCCSP mitigation measures, the Project shall implement the following Project-specific mitigation measures:

Project-Specific MM AQ-1: Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas of the warehouse portion of the Project that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include: (1) instructions for truck drivers to shut off engines when not in use; (2) instructions for drivers of diesel trucks to restrict idling to no more than 5 minutes once the vehicle is stopped, the transmission is set to “neutral” or “park,” and the parking brake is engaged; and (3) telephone numbers of the building facilities manager and the CARB to report violations. Prior to the issuance of an occupancy permit, the City shall conduct a site inspection to ensure that the signs are in place.

Project-Specific MM AQ-2: Prior to the issuing of each building permit, the project proponent and its contractors shall provide plans and specifications to the City of Perris Building Department that demonstrate that each project building is designed for passive heating and cooling and is designed to include natural light. Features designed to achieve this shall include the proper placement of windows, overhangs, and skylights.

Project-Specific MM AQ-3: Prior to the issuing of each building permit, the project proponent and its contractors shall provide plans and specifications to the City of Perris Building Department that demonstrate that electrical service is provided to each of the areas in the vicinity of the building that are to be landscaped in order that electrical equipment may be used for landscape maintenance.

Project-Specific MM AQ-4: Once constructed, the project proponent shall ensure that all building tenants in the warehouse portion of the Project shall utilize electric equipment for landscape maintenance to the extent feasible, through requirements in the lease agreements.

Project-Specific MM AQ-5: Once constructed, the project proponent shall ensure that all building tenants shall utilize only electric or natural gas service yard trucks (hostlers), pallet jacks and forklifts, and other onsite equipment, through requirements in the lease agreements. Electric-powered service yard trucks (hostlers), pallet jacks and forklifts, and other onsite equipment shall also be required instead of diesel-powered equipment, if technically feasible. Yard trucks may be diesel fueled in lieu of electrically or natural gas fueled provided such yard trucks are at least compliant with California Air Resources Board (CARB) 2010 standards for on-road vehicles or CARB Tier 4 compliant for off-road vehicles.

Project-Specific MM AQ-6: Upon occupancy, the facility operator for the warehouse portion of the Project shall require tenants that do not already operate 2010 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, SmartWay Finance, or other similar funds. If awarded, the tenant shall be required to accept and use the funding. Tenants shall be encouraged to consider the use of alternative fueled trucks as well as new or retrofitted diesel trucks. Tenants shall also be encouraged to become SmartWay Partners, if eligible. This measure shall not apply to trucks that are not owned or operated by the facility operator or facility tenants since it would be infeasible to prohibit access to the site by any truck that is otherwise legal to operate on California roads and highways. The facility operator shall provide an annual report to the City of Perris Planning Division. The report shall: one, list each engine design; two, describe the effort made by each tenant to obtain funding to upgrade their fleet and the results of that effort; and three, describe the change in each fleet composition from the prior year.

Project-Specific MM AQ-7: Tenants who employ 250 or more employees on a full- or part-time basis shall comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. The purpose of this rule is to provide employees with a menu of options to reduce employee commute vehicle emissions. Tenants with less than 250 employees or tenants with 250 or more employees who are exempt from SCAQMD Rule 2202 (as stated in the Rule) shall either (a) join with a tenant who is implementing a program in accordance with Rule 2202 or (b) implement an emission reduction program similar to Rule 2202 with annual reporting of actions and results to the City of Perris. The tenant-implemented program would include, but not be limited to the following:

- Appoint a Transportation Demand Management (TDM) coordinator who would promote the TDM program, activities, and features to all employees.
- Create and maintain a “commuter club” to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work.
- Inform employees of public transit and commuting services available to them (e.g., social media, signage).
- Provide on-site transit pass sales and discounted transit passes.
- Guarantee a ride home.
- Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted.

- Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.”

Related to this measure, the Ramona Gateway Vehicle Miles Traveled (VMT) Analysis (Urban Crossroads, 2022) includes the following TDM strategies:

- Implementation of pedestrian network improvements that would provide a pedestrian access network to link areas of the Project site that would encourage people to walk instead of drive. This mode shift results in people driving less and thus a reduction in VMT. The project will provide a pedestrian access network that internally links all uses and connects to existing pedestrian facilities contiguous with the project site. The project will minimize barriers to pedestrian access and interconnectivity. There is existing sidewalk east of the Project along Webster Avenue. The Project would provide pedestrian connections on-site that would connect to the existing sidewalk along Webster Avenue. Notably a sidewalk would be provided along the south side of Ramona Expressway adjacent to the Project site, which would connect to the sidewalk along the west side of Webster Avenue. The proposed Ramona Expressway sidewalk would also connect to the sidewalk to be constructed along the east side of Nevada Avenue, adjacent to the Project site.
- The Project would further reduce its VMT impact through the implementation of a voluntary commute trip reduction (CTR) program that would discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, transit usage, walking and biking. The CTR program will provide employees assistance in using alternative modes of travel and provide incentives to encourage employee usage. CTR program would be a multi-strategy program that could include the following individual measures:
 - Carpooling encouragement
 - Ride-matching assistance
 - Preferential carpool parking
 - Flexible work schedules for carpools
 - Half-time transportation coordinator
 - New employee orientation of trip reduction and alternative travel mode options
 - Vanpool assistance
 - Bicycle end-trip facilities (parking and lockers)

Project-Specific MM AQ-8: Prior to the issuance of a building permit, the project proponent shall provide evidence to the City that loading docks are designed to be compatible with SmartWay trucks.

Project-Specific MM AQ-9: Upon occupancy and annually thereafter, the facility operator shall provide information to all tenants, with instructions that the information shall be provided to employees and truck drivers as appropriate, regarding:

- Building energy efficiency, solid waste reduction, recycling, and water conservation.
- Vehicle GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting.

- Participation in the Voluntary Interindustry Commerce Solutions (VICS) “Empty Miles” program to improve goods trucking efficiencies.
- Health effects of diesel particulates, State regulations limiting truck idling time, and the benefits of minimized idling.
- The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity.

Project-Specific MM AQ-10: Prior to issuance of a building permit, the project proponent shall provide the City with an onsite signage program that clearly identifies the required onsite circulation system. This shall be accomplished through posted signs and painting on driveways and internal roadways.

Project-Specific MM AQ-11: Prior to issuance of an occupancy permit, the City shall confirm that signs clearly identifying approved truck routes have been installed along the truck routes to and from the Project sites.

Project-Specific MM AQ-12: Prior to issuance of an occupancy permit, the project proponent shall install a sign on the property with telephone, email, and regular mail contact information for a designated representative of the tenant who would receive complaints about excessive noise, dust, fumes, or odors. The sign shall also identify contact data for the City for perceived Code violations. The tenant’s representative shall keep records of any complaints received and actions taken to communicate with the complainant and resolve the complaint. The tenant’s representative shall endeavor to resolve complaints within 24 hours.

Project-Specific MM AQ-13: Prior to issuance of a building permit, the project proponent shall provide the City with project specifications, drawings, and calculations that demonstrate that main electrical supply lines and panels have been sized to support heavy truck charging facilities when these trucks become available. The calculations shall be based on reasonable predictions from currently available truck manufacturer’s data. Electrical system upgrades that exceed reasonable costs shall not be required.

Additionally, the comment letter provided by the SCAQMD during the 2022 NOP scoping period requested that the lead agency consider mitigation measures including Requiring zero-emission (ZE) or near-zero (NZE) on road trucks, limiting or putting a daily truck cap on the Project, and providing EV charging stations and electrical hookups, require solar, light-colored roofs, etc. The SCAQMD also provided these recommendations to reduce health risk assessment impacts from diesel exhaust. Based on the 2021 Feasibility Assessment for Drayage Trucks on the San Pedro Bay Ports Clean Air Action Plan, requiring heavy-duty trucks to comply with such standards is currently infeasible due to the lack of availability of the recommended technology (Tetra Tech 2021). Similarly, it is not feasible for the City to impose and monitor a truck cap or limitation of the trucks that would go to and from the Project. Additionally, solar panels cannot be used at the Project site due to limitations on solar imposed by the MARB/IPA ALUCP. Therefore, no additional mitigation proposed by the SCAQMD are feasible or applicable to the proposed Project.

Additionally, Appendix D to the 2022 Scoping Plan includes local actions aimed at providing local jurisdictions with tools to reduce GHGs and assist the State in meeting the ambitious targets set forth in the 2022 Scoping Plan. Notably, this section is focused on residential and mixed-use projects and does

not address other land use types (e.g., industrial) or air permitting. As the Project would include industrial and commercial land use types, it would not be relevant to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development. Therefore, no additional mitigation proposed by the SCAQMD and CARB are feasible or applicable to the proposed Project.

Level of Significance After Mitigation

While the proposed Project will implement the Project-specific mitigation measures AQ-1 through AQ-13 discussed above as well as the applicable PVCCSP EIR mitigation measures Air 4 through Air 7, Air 11 through 14, and Air 18 through 20, it should be noted that there is no way to quantify these reductions in the California Emissions Estimator Model (CalEEMod). Therefore, to provide a conservative disclosure of Project emissions, no reductions in emissions are assumed to occur even with implementation of the below measures.

Therefore, as a conservative measure the GHG emissions presented in this analysis do not reflect emissions reductions that would result from the implementation of these mitigation measures. While it is likely that implementation of these measures will decrease Project emissions somewhat, the GHG emissions produced by the Project would remain a significant and unavoidable impact.

Threshold b: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Analysis

SB 32/2017 Scoping Plan Consistency

As previously stated, pursuant to 15604.4 of the *CEQA Guidelines*, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions (AEP 2018). As such, the Project's consistency with the 2022 Scoping Plan, is discussed below. It should be noted that the Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 and 2017 Scoping Plan is not necessary since both of these plans have been superseded by the 2022 Scoping Plan. As previously noted, the 2022 Scoping Plan advocates for compliance with a local CAP to determine consistency.

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the Project will comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. Further, the Project would be required to implement PVCCSP EIR mitigation measures MM Air-4 MM Air 5, MM Air 6, MM Air 7, MM Air 11, MM Air 12, MM Air 13, MM Air 14, MM Air 18, MM Air 19, and MM Air-20, along with Project-specific MM AQ-1 through AQ-13. These are discreet mitigation measures aimed at reducing air quality and associated GHG emissions.

As noted in the analysis herein, compliance with these mitigation measures would ensure that the Project would be consistent with the Perris CAP through compliance with the PVCCSP EIR mitigation measures and regulatory requirements. PVCCSP EIR mitigation measure MM Air-18 will improve the local public transit network by accommodating future bus turnouts at locations established through consultation with the Riverside Transit Agency. Additionally, PVCCSP EIR mitigation measures MM Air-11 through MM-AQ-20 will further reduce Project GHG emissions and VMT, including increased implementation and availability of vehicle and equipment electrification, Transportation Demand Management programs, and optimization of vehicle access and activity. The Project would result in a less than significant VMT impact as further discussed in the Project-specific VMT analysis. As such, the Project would be consistent with the 2022 Scoping Plan.

Consistency with the City's CAP

The City of Perris adopted its 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:

- 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)
- Solid waste measures that reduce landfilled solid waste in the City

The Project would comply with the CAP through compliance with the PVCCSP EIR MMs and additional project-level air quality MMs identified above, which would lessen the Project's contribution of GHG emissions from both construction and operation to the extent feasible. Although the GHG emissions from this project would contribute to the Significant and Unavoidable impact of GHG emissions overall, the Project would not conflict with local strategies or state/regional strategies listed in the Perris CAP.

Further, the Project is subject to California Building Code requirements. New buildings must meet the applicable building code requirements and standards in place at the time building permit documentation submittals are made. CALGreen is updated on a regular basis, with the most recently approved 2022 California Green Building Code Standards taking effect on January 1, 2023. As construction of the Project is anticipated to be completed in 2024, it is presumed that the Project would be required to comply with the Title 24 standards in place at that time. The Project would provide sidewalks, bike racks, pedestrian walkways, a bus stop, and TDM measures to encourage the use of alternative modes of transportation (walking, biking, and transit). As such, the Project would not conflict with applicable GHG reduction measures in the CAP and a less than significant impact is expected to occur.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

4.7.5 Cumulative Impacts

Individual projects would result in impacts that are cumulatively considerable when the individual project, along with all other past, present, and probably future projects, would contribute to the potential for global climate change. While individual projects are unlikely to measurably affect global climate change, each of these projects incrementally contributes toward the potential for global climate change on a cumulative basis, in concert with all other past, present, and probable future projects.

Despite the global nature of GHG impacts, it is important to note that the scope of the City's jurisdictional authority is limited to certain types of emissions generated within the City's physical boundaries. The City's authority does not include the regulation of the majority of actions, including for example, transportation policy, fuel consumption, and energy generation, which the state has determined are necessary to meet all of AB 32's greenhouse gas reduction goals. Further, some of the GHG emissions associated with the Project can be reduced only by measures to be implemented by other governmental agencies which are outside the City's jurisdiction. GHG emissions are clearly significant on a global basis, and when GHG emissions are outside of the lead agency's jurisdiction and control, consistent with Public Resources Code Section 21081(a)(2), a project has cumulatively considerable significant and unavoidable GHG impacts if other agencies do not take necessary action. These other agencies can and should adopt requirements to ensure cumulative GHG reductions.

Greenhouse gas emissions modeling was used to predict the amount of greenhouse gases the Project would generate during construction and operation. The total GHG emissions were above the SCAQMD interim significance threshold level of 10,000 MT CO₂e/year for industrial projects as well as the threshold of 3,000 MT CO₂e/year used to evaluate this Project.

Although the proposed Project is expected to emit greenhouse gases, given the global reach of climate change, the emission of greenhouse gases by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of greenhouse gas from more than one project and many sources in the atmosphere that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects on a cumulative basis. The fact that GHG emissions are cumulative was noted by the CRNA in its Public Notice for the SB 97's CEQA amendments regarding GHG. Because the proposed Project's GHG emissions would exceed both the threshold selected for this Project and the SCAQMD's recommended threshold, the cumulative impact of the proposed project on GHG emissions would be significant and unavoidable.

4.7.6 References

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4.8 HAZARDS AND HAZARDOUS MATERIALS

This section identifies and evaluates the Project’s potential impacts related to hazards and hazardous materials. The analysis in this section is based, in part, on information from the following document. References used to prepare this section are listed in Subsection 4.8.6, References, at the end of this section.

- Phase I Environmental Site Assessment OLC3 Ramona Expressway and Perris Boulevard Commercial Warehouse Project, Perris, California 92571, prepared by Earth Strata Geotechnical Services (ESGS) (Phase I ESA) (September 2, 2021) (Appendix M of this Draft EIR)

For purposes of this Draft EIR, the term “toxic substance” is defined as a substance that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may present an unreasonable risk of injury to human health or the environment. Toxic substances include chemical, biological, flammable, explosive, and radioactive substances. The term “hazardous material” is defined as a substance that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may (1) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, disposed of, or otherwise mismanaged; or (2) cause or contribute to an increase in mortality or an increase in irreversible or incapacitating illness.

Hazardous waste is defined in the California Code of Regulations, Title 22, Section 66261.3. The defining characteristics of hazardous waste are ignitability (oxidizers, compressed gases, and extremely flammable liquids and solids); corrosivity (strong acids and bases); reactivity (explosives or generates toxic fumes when exposed to air or water); and toxicity (materials listed by the United States Environmental Protection Agency [USEPA] as capable of inducing systemic damage to humans or animals). Certain wastes are called “Listed Wastes” and are found in the California Code of Regulations, Title 22, Sections 66261.30 through 66261.35. Wastes appear on the lists because of their known hazardous nature or because the processes that generate them are known to produce hazardous wastes (which are often complex mixtures).

There were no comments received on the 2022 or 2023 NOPs or at the July 20, 2022 Draft EIR public scoping meeting regarding the analysis of hazards and hazards materials.

4.8.1 Existing Setting

As described in detail in EIR Section 2.0 and illustrated on **Figure 3-3**, Aerial Photograph, the Project site the property is vacant and undeveloped. It is located near the Northeast corner of Ramona Expressway and North Perris Boulevard, Perris, California. The site is tilled, undeveloped, flat, vacant and is covered with disturbed vegetation.

4.8.1.1 Historical Review, Regulatory Records Review, and Field Reconnaissance

Historical Review

ESGS conducted a Phase I ESA for the Project site in accordance with the American Society for Testing and Materials (ASTM) E1527-13 guidelines to evaluate the potential for Recognized Environmental Conditions (RECs). The ASTM E1527 Standard defines what constitutes “good commercial and customary practice for conducting an environmental site assessment of a parcel of commercial real estate in the

United States of America with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation & Liability (CERCLA) Act (42 U.S.C. 9601) and petroleum products.” In preparing the Phase I ESA, ESGS performed a historical review for the Project site. The historical review is used to develop an understanding of the previous uses onsite and in the surrounding area to identify the likelihood of past uses, or activities having environmentally impacted, the site. The historical review consisted of a search of various public and private Standard Historical Sources, as detailed below.

As defined by ASTM E1527-2013, a Standard Historical Source is considered complete if the information contained within the source identifies all uses of the subject property from the time the property was first used for residential, agricultural, commercial, industrial, or governmental purposes. Ideally, the information should be available in either five-year intervals or site milestone events (i.e., initial construction activities, demolition activities, etc.). However, available public and private historical sources do not always fulfill this goal, in which case, the closest approximation is made based upon the sources readily available at the time of historical review.

Aerial photographs were reviewed by ESGS to evaluate past land-use patterns of the Project site and vicinity. The photos were supplied by Environmental Database Reports (EDR) and are from the following years 1938, 1949, 1953, 1961, 1967, 1978, 1985, 1989, 1996, 2002, 2006, 2009, 2012 and 2016. Copies of representative aerial photographs can be found in Appendix B of The Phase I ESA (Appendix M). This review revealed the following:

- From 1938 to 1985, the Project site is undeveloped, vacant and in a rural agricultural setting. Residential encroachment appears to the south in the mid-1980s.
- From 1985 to Present, the Project site is undeveloped, vacant. Residential and commercial encroachment appears to the south in the late 1980s.

From the historical information review discussed above, ESGS concludes that the Project site appears to have always been undeveloped except for the small area in the southern portion that appears to be an olive orchard. No dry cleaners, gasoline stations, major landfills, military bases, or heavy industrial businesses were identified on the Project site. Currently the site is vacant and undeveloped.

Regulatory Records Review

Regulatory agency database information was obtained from a standard radius site assessment report by a third party. The center of the search was in the approximate center of the Project site. Search distances for specific databases were one-quarter to one mile as specified in the ASTM 1527-13 standard. The database search includes over 70 federal, State, local, and proprietary records. A complete copy of the records search report is included in the Phase I ESA. A summary of the research results is provided below.

To evaluate whether the Project site and/or nearby sites have reported USTs, hazardous waste generation, or hazardous material releases, regulatory information from the federal, state, and local agencies listed below were reviewed. The database report was compiled by a third-party database provider and is reportedly the most recent database information available from each agency. The Project site was not identified on any federal, State, or local environmental records database. There were several identified sites within the search radius; however, ESGS does not feel that the surrounding sites pose an REC based on the distance, elevation, and status of each. Additionally, ESGS’s research

indicates no dry cleaners, gasoline stations, military bases, or major manufacturing operations have occupied the Project site.

Field Reconnaissance

ESGS conducted an inspection of the Project site and surrounding area on August 31, 2021. No hazardous materials were observed at the Project site. No significant staining or spillage was observed in any of the areas inspected. No other significant hazardous materials handling, or storage were observed on the subject property during the site visit. During the inspection, no hazardous waste generation, storage, or improper hazardous waste disposal was observed on the subject property. Stained or discolored sinks, drains, catch basins, drip pads, or sumps were not observed. Additionally, significant spills or staining were not observed at the subject property. An area for drum storage was observed with several drums and appeared in good condition. During the inspection, no solid waste generation, storage, or improper solid waste disposal was observed on the subject property. Additionally, visual, or physical indicators of current or former Aboveground Storage Tanks (ASTs) were not observed at the subject property during the site visit, nor were Underground Storage Tanks (USTs) observed.

ESGS's review did not indicate any areas of storage or mixing of pesticides and herbicides related to past agricultural activity onsite. There was no evidence of chemical use, storage, spills, or trash build up noted during the site visit conducted by ESGS, and no evidence of RECs from the current use of the site. Further, the Project site is in an area that has had historical agricultural activities. Surrounding areas include residential uses beyond vacant land to the east, vacant land to the north, vacant land, and residential uses to the south (beyond Ramona Expressway), and industrial uses to the west (beyond Perris Boulevard). The Phase I ESA found no evidence of off-site facilities that have impacted the Project site. These results are consistent with previous ESAs conducted for the Project site. No RECs were identified, and no further action was recommended in the reports (ESGS 2021).

4.8.1.2 Airport Hazards

The Project site is located within the MARB Airport Influence Area Boundary and the City's Airport Overlay Zone. The Project site is located almost entirely within Airport Compatibility Zone D (Flight Corridor Buffer) with a small portion of the site located within Zone C1 (Primary Approach/Departure Zone). Zone C1 restricts the placement of noise sensitive land uses. Although no explicit upper limit on usage intensity is defined for Zone D, 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.

4.8.1.3 Wildland Fire Hazards

The Project area is in a portion of the City of Perris that is not located adjacent to any wildlands. According to the Perris General Plan Safety Element, the Project area and its surrounding area are not located within a wildfire hazard area (City of Perris 2016). Additionally, according to the California Department of Forestry and Fire Protection's (Cal Fire) Fire Hazard Severity Zone Viewer (FHSZV), the Project area is not located in a Very High Fire Hazard Severity Zone (VHFHSZ) of the City (CAL FIRE 2018).

4.8.2 Existing Policies and Regulations

Hazardous materials and hazardous wastes are regulated by various federal, State, and local regulations to protect public health and the environment. This section summarizes the overall regulatory framework governing hazardous materials management that is applicable to the Project and the Project site.

4.8.2.1 Federal

Comprehensive Environmental Response, Compensation, and Liability Act and Superfund Amendments and Reauthorization Act

The Comprehensive Environmental Response, Compensation, and Liability Act, also known as CERCLA or Superfund, provides a Federal “Superfund” to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. Through CERCLA, the U.S. Environmental Protection Agency (USEPA) was given power to seek out those parties responsible for any release and assure their cooperation in the cleanup.

The USEPA cleans up orphan sites when potentially responsible parties cannot be identified or located, or when they fail to act. Through various enforcement tools, the USEPA obtains private party cleanup through orders, consent decrees, and other small party settlements. The USEPA also recovers costs from financially viable individuals and companies once a response action has been completed.

The USEPA is authorized to implement the Act in all 50 states and U.S. territories. Superfund site identification, monitoring, and response activities in states are coordinated through the state environmental protection or waste management agencies. The Superfund Amendments and Reauthorization Act (SARA) of 1986 reauthorized CERCLA to continue cleanup activities around the country. Several site-specific amendments, definitions clarifications, and technical requirements were added to the legislation, including additional enforcement authorities. Also, Title III of SARA authorized the Emergency Planning and Community Right-to-Know Act (EPCRA) (USEPA 2018a).

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) gives the USEPA the authority to control hazardous waste from the “cradle-to-grave.” This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid waste. The 1986 amendments to RCRA enabled USEPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization and phasing out land disposal of hazardous waste as well as corrective action for releases. Some of the other mandates of this law include increased enforcement authority for USEPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program (USEPA 2018b).

Hazardous Materials Transportation Act

The Hazardous Materials Transportation Act of 1975 (HMTA) empowered the Secretary of Transportation to designate as hazardous material any “particular quantity or form” of a material that “may pose an unreasonable risk to health and safety or property.”

Hazardous materials regulations are subdivided by function into four basic areas:

- Procedures and/or Policies 49 CFR Parts 101, 106, and 107
- Material Designations 49 CFR Part 172

- Packaging Requirements 49 CFR Parts 173, 178, 179, and 180
- Operational Rules 49 CFR Parts 171, 173, 174, 175, 176, and 177

The HMTA is enforced by use of compliance orders [49 U.S.C. 1808(a)], civil penalties [49 U.S.C. 1809(b)], and injunctive relief (49 U.S.C. 1810). The HMTA (Section 112, 40 U.S.C. 1811) preempts State and local governmental requirements that are inconsistent with the statute, unless that requirement affords an equal or greater level of protection to the public than the HMTA requirement (OSHA n.d.).

Hazardous Materials Transformation Uniform Safety Act of 1990

In 1990, Congress enacted the Hazardous Materials Transportation Uniform Safety Act (HMTUSA) to clarify the maze of conflicting state, local, and federal regulations. Like the HMTA, the HMTUSA requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce. The Secretary also retains authority to designate materials as hazardous when they pose unreasonable risks to health, safety, or property.

The statute includes provisions to encourage uniformity among different state and local highway routing regulations, to develop criteria for the issuance of federal permits to motor carriers of hazardous materials, and to regulate the transport of radioactive materials (OSHA n.d.).

Occupational Safety and Health Act

Congress passed the Occupational and Safety Health Act (OSHA) to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions (USEPA 2017).

To establish standards for workplace health and safety, the Act also created the National Institute for Occupational Safety and Health (NIOSH) as the research institution for OSHA. OSHA is a division of the U.S. Department of Labor that oversees the administration of the Act and enforces standards in all 50 states.

Toxic Substances Control Act

The Toxic Substances Control Act of 1976 provides the USEPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. The TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint (USEPA 2018c).

Various sections of the TSCA provide authority to:

- Require, under Section 5, pre-manufacture notification for “new chemical substances” before manufacture.
- Require, under Section 4, testing of chemicals by manufacturers, importers, and processors where risks or exposures of concern are found.

- Issue Significant New Use Rules (SNURs), under Section 5, when it identifies a “significant new use” that could result in exposures to, or releases of, a substance of concern.
- Maintain the TSCA Inventory, under Section 8, which contains more than 83,000 chemicals. As new chemicals are commercially manufactured or imported, they are placed on the list.
- Require those importing or exporting chemicals, under Sections 12(b) and 13, to comply with certification reporting and/or other requirements.
- Require, under Section 8, reporting and record-keeping by persons who manufacture, import, process, and/or distribute chemical substances in commerce.
- Require, under Section 8(e), that any person who manufactures (including imports), processes, or distributes in commerce a chemical substance or mixture and who obtains information which reasonably supports the conclusion that such substance or mixture presents a substantial risk of injury to health or the environment to immediately inform USEPA, except where USEPA has been adequately informed of such information. USEPA screens all TSCA b§8(e) submissions as well as voluntary “For Your Information” (FYI) submissions. The latter are not required by law but are submitted by industry and public interest groups for a variety of reasons.

4.8.2.2 State

Cal/OSHA and the California State Plan

Under an agreement with OSHA, since 1973 California has operated an occupational safety and health program in accordance with Section 18 of the federal OSHA. The State of California’s Department of Industrial Relations administers the California Occupational Safety and Health Program, commonly referred to as Cal/OSHA. The State of California’s Division of Occupational Safety and Health (DOSH) is the principal agency that oversees plan enforcement and consultation. In addition, the California State program has an independent Standards Board responsible for promulgating State safety and health standards and reviewing variances. It also has an Appeals Board to adjudicate contested citations and the Division of Labor Standards Enforcement to investigate complaints of discriminatory retaliation in the workplace.

Pursuant to 29 CFR 1952.172, the California State Plan applies to all public and private sector places of employment in the State, except for federal employees, the United States Postal Service, private sector employers on Native American lands, maritime activities on the navigable waterways of the United States, private contractors working on land designated as exclusively under federal jurisdiction and employers that require federal security clearances. Cal/OSHA is the only agency in the State authorized to adopt, amend, or repeal occupational safety and health standards or orders. In addition, the Standards Board maintains standards for certain things not covered by federal standards or enforcement, including elevators, aerial passenger tramways, amusement rides, pressure vessels and mine safety training. The Cal/OSHA enforcement unit conducts inspections of California workplaces in response to a report of an industrial accident, a complaint about an occupational safety and health hazard, or as part of an inspection program targeting industries with high rates of occupational hazards, fatalities, injuries, or illnesses.

California Hazardous Waste Control Law

The Hazardous Waste Control Law (HWCL) (Health and Safety Code [HSC], Division 20, Chapter 6.5, Article 2, Section 25100, et seq.) is the primary hazardous waste statute in California. The HWCL implements RCRA as a “cradle-to-grave” waste management system in the state. It specifies that generators have the primary duty to determine whether their wastes are hazardous and to ensure its proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reuse as raw materials. The HWCL exceeds federal requirements by mandating source reduction planning and broadening requirements for permitting facilities that treat hazardous waste. It also regulates a number of waste types and waste management activities not covered by federal law (RCRA).

California Code of Regulations, Titles 22 and 26

A variety of California Code of Regulation (CCR) titles address regulations and requirements for generators of hazardous waste. Title 22 contains detailed compliance requirements for hazardous waste generators, transporters, and facilities for treatment, storage, and disposal. Because California is a fully authorized state according to RCRA, most regulations (i.e., 40 CFR 260, et seq.) have been duplicated and integrated into Title 22. However, because the Department of Toxic Substances Control (DTSC) regulates hazardous waste more stringently than the USEPA, the integration of State and federal hazardous waste regulations that make up Title 22 does not contain as many exemptions or exclusions as does 40 CFR 260. As with the HSC, Title 22 also regulates a wider range of waste types and waste management activities than does RCRA. To aid the regulated community, California has compiled hazardous materials, waste, and toxics-related regulations from CCR, Titles 3, 8, 13, 17, 19, 22, 23, 24 and 27 into one consolidated listing: CCR Title 26 (Toxics). However, the hazardous waste regulations are still commonly referred to collectively as “Title 22.”

4.8.2.3 Regional

Aeronautics Act

The Aeronautics Act (Public Utilities Code, Section 21001 et seq.) provides for the right of flight over private property, unless conducted in a dangerous manner or at altitudes below those prescribed by federal authority. The Aeronautics Act gives the State Department of Transportation (Caltrans) and local governments the authority to protect the airspace defined by FAR Part 77 criteria. The Aeronautics Act prohibits any person from constructing a structure or permitting any natural growth of a height that would constitute a hazard to air navigation unless a permit is obtained. No permit is required if it is determined that the structure or growth is not a hazard to aviation. Typically, this has been interpreted to mean that no penetration of FAR Part 77 imaginary surfaces is permitted without a finding by the FAA that the object would not constitute a hazard to air navigation.

The State Aeronautics Act also created the requirement for an Airport Land Use Commission (ALUC) in each county and established statewide requirements for the conduct of airport land use compatibility planning. State statutes require that, once an ALUC has adopted or amended an airport land use compatibility plan, the county (where it has land use jurisdiction within the airport influence area), and any affected cities must update their General Plans and any applicable specific plans to be consistent with the ALUC's plan (Government Code, Section 65302.3). The California Airport Land Use Planning Handbook is published by the Caltrans Division of Aeronautics to support and amplify the State regulations. The most recent California Airport Land Use Planning Handbook was published in October

2011 and as required by CEQA Public Resources Code Section 21096, was used as a technical resource in the preparation of this Draft EIR.

March Air Reserve Base/Inland Port Airport

The Riverside County ALUC is the lead agency responsible for airport land use compatibility planning in Riverside County. The fundamental purpose of ALUC is to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses. The basic function of the airport land use compatibility plan is to promote compatibility between airports and the land uses that surround them. Compatibility plans serve as a tool for use by airport land use commissions in fulfilling their duty to review proposed development plans for airports and surrounding land uses. Additionally, compatibility plans set compatibility criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances and to landowners in their design of new development.

The nearest airport to the Project area is MARB/IPA located approximately 2.9 miles northwest of the Project site. On November 13, 2014, the Riverside County ALUC adopted the MARB/IPA ALUCP. The compatibility zones and associated criteria set forth in the MARB/IPA ALUCP provide noise and safety compatibility protection (RCALUC 2014). In 2018, MARB published an update to its AICUZ study that has not yet been incorporated into the 2014 MARB/IPA ALUCP (MARB 2018). The 2018 AICUZ report provides updated information about the Base operations and related safety and noise impacts.

The Project site is located within the AIA of MARB/IPA and is subject to the 2014 MARB/IPA ALUCP. The Project site is located almost entirely within Airport Compatibility Zone D (Flight Corridor Buffer) with a small portion of the site located within Zone C1 (Primary Approach/Departure Zone). Compatibility Zone C1 encompasses most of the projected 60 dB CNEL contour plus immediately adjoining areas. The zone boundary follows geographic features. Accident potential risks are moderate in that aircraft fly at low altitudes over or near the zone. Zone C1 restricts non-residential intensity to 100 people per average acre and 250 people per single acre. Zone D is intended to encompass other places where aircraft may fly at or below 3,000 feet above the airport elevation either on arrival or departure. Accident potential risk levels in this zone are low. Zone D does not limit non-residential intensity (RCALUC 2014).

Riverside County Department of Environmental Health

Federal and state hazardous materials regulations require all businesses that handle more than a specified amount of hazardous materials or extremely hazardous materials to obtain applicable permits and submit a business plan to its local Certified Unified Program Agency (CUPA). The CUPA also ensures local compliance with all applicable hazardous materials regulations. The CUPA with responsibility for the City of Perris is Riverside County Department of Environmental Health (RCDEH). The RCDEH oversees six hazardous materials programs in the County of Riverside, including inspecting facilities that handle hazardous materials, generate hazardous waste, treat hazardous waste, own/operate underground storage tanks, own/operate aboveground petroleum storage tanks, or handle other materials subject to the California Accidental Release Program (RCDEH 2020).

County of Riverside Multi-Jurisdictional Local Hazard Mitigation Plan

The purpose of the County of Riverside Multi-Jurisdictional Local Hazard Mitigation Plan is to identify the County's hazards, review and assess past disaster occurrences, estimate the probability of future

occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and man-made hazards. The Plan was prepared pursuant to the requirements of the Disaster Mitigation Act of 2000 to achieve eligibility and potentially secure mitigation funding through Federal Emergency Management Agency (FEMA) Flood Mitigation Assistance, Pre-Disaster Mitigation, and Hazard Mitigation Grant Programs (County of Riverside EMD 2018).

4.8.2.4 Local Regulations

MARB/IPA Airport Overlay Zone

In 2014, and after approval of the City of Perris' 2005 General Plan, the Riverside County ALUC adopted the 2014 MARB/IPA ALUCP. Thus, the City was required to update its General Plan to reflect the new ALUCP. The City created an AOZ to accommodate development within the City consistent with the land use designations of the 2014 MARB/IPA ALUCP. On July 14, 2016, the Riverside County ALUC determined that the City's AOZ is consistent with the 2014 MARB/IPA ALUCP.

In August 2016, the City of Perris approved the following: Resolution 5050 approving General Plan Amendment 15-01522, to amend the City of Perris General Plan (2030) Land Use, Noise, and Safety Elements to implement the 2014 MARB/IPA ALUCP; Ordinance Number 1331 approving Ordinance Amendment 16-05024 to update Perris Municipal Code Chapter 19.82 (Districts and Map) to revise the City of Perris Zoning Map to include an Airport Overlay Zoning designation and adopt an AOZ Code Chapter 19 (19.51) to implement the 2014 MARB/IPA ALUCP; and, Ordinance Number 1332 approving Specific Plan Amendment 16-05025 to amend the PVCCSP to update the Airport Overlay Zone Section (Section 12) to implement the 2014 MARB/IPA ALUCP.

City of Perris General Plan Policies

The specific policies outlined in the City's General Plan Safety Element that are related to hazards and hazardous materials and that apply to the Project are listed in Table 4.10-2, City of Perris General Plan Consistency Analysis, of Section 4.10, *Land Use and Planning*, of this Draft EIR.

4.8.2.5 Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The PVCCSP EIR includes MMs for potential impacts related to hazards and hazardous materials, which are listed below. Applicable mitigation measures which are required to be implemented in connection with Project development, construction and operation are identified below and are assumed in the analysis presented in this section.

MM Haz 2	Prior to the recordation of a final map, issuance of a building permit, or conveyance to an entity exempt from the Subdivision Map Act, whichever occurs first, the landowner shall convey an avigation easement to the MARB.
MM Haz 3	Any outdoor lighting installed shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane.
MM Haz 4	The following notice shall be provided to all potential purchasers and tenants: "This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for

example, noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you. Business & Profession Code 11010 13(A)”

MM Haz 5 The following uses shall be prohibited:

- 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.
- d. Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.
- e. All retention and water quality basins shall be designed to dewater within 48 hours of a rainfall event.

MM Haz 6 A minimum of 45 days prior to submittal of an application for a building permit for an implementing development project, the implementing development project applicant shall consult with the City of Perris Planning Department to determine whether any implementing project-related vertical structures or construction equipment will encroach into the 100-to-1 imaginary surface surrounding the MARB. If it is determined that there will be an encroachment into the 100-to-1 imaginary surface, the implementing development project applicant shall file a FAA Form 7460-1, *Notice of Proposed Construction or Alteration*. If FAA determines that the implementing development project would potentially be an obstruction unless reduced to a specified height, the implementing development project applicant and the Perris Planning Division will work with FAA to resolve any adverse effects on aeronautical operations.

4.8.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, a project will normally a significant environmental impact related to hazards and hazardous materials if the project would:

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

- 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;
- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 1-quarter mile of an existing or proposed school;
- 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;
- 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;
- f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and
- g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

4.8.4 Environmental Impacts

Threshold a: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Impact Analysis

The Project site is vacant with an abandoned water stack (i.e., agricultural water source) likely associated with previous agricultural uses is in the central portion of the Project site. Implementation of the Project would require demolition and removal of the water stack and improvements from the Project site and would result in the construction and long-term operation of a warehouse building and retail/commercial uses on the site. Were any hazards or hazardous materials to be present on the Project site or any hazardous materials used/stored on the Project site during construction or long-term operation, the Project would have the potential to expose workers on-site, the public, and/or the environment to a substantial hazard. The analysis below evaluates the potential for the Project to result in a substantial hazard to people or the environment during the routine transport, use, or disposal of hazardous materials. As discussed in Subsection 4.8.1, the Project site contains no evidence of RECs, USTs, PCBs, or significant chemical release/disposal on the Project site.

Impact Analysis for Temporary Construction Activities

Heavy equipment (e.g., dozers, excavators) would be used during construction of the buildings and associated improvements. Heavy equipment is typically fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be in the Project area during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk

on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the Project than would occur on any other similar construction site.

Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the USEPA, California DTSC, SCAQMD (discussed in Section 4.2, *Air Quality*, of this Draft EIR), and RWQCB (discussed in Section 4.9, *Hydrology and Water Quality*, of this Draft EIR). With mandatory compliance to applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Impacts would be less than significant.

Impact Analysis for Long-Term Operational Activities

Operation of the Project warehouse and retail/commercial uses would involve the use of materials common to all urban development that are labeled hazardous (e.g., solvents and commercial cleansers; petroleum products; and pesticides, fertilizers, and other landscape maintenance materials). There is the potential for routine use, storage, or transport of other hazardous materials; however, the precise materials are not known, as the tenants of the proposed warehouse and retail/commercial uses are not yet defined. If hazardous materials, other than those common materials described above, are associated with future warehouse and retail/commercial operations, the hazardous materials would only be stored and transported to and from the building site. Manufacturing and other chemical processing would not occur within the proposed warehouse and retail/commercial uses.

Exposure of people or the environment to hazardous materials during operation of the Project may result from (1) the improper handling or use of hazardous substances; (2) transportation accidents; or (3) an unforeseen event (e.g., fire, flood, or earthquake). The severity of any such exposure is dependent upon the type and amount of the hazardous material involved; the timing, location, and nature of the event; and the sensitivity of the individuals or environment affected. As previously discussed, the U.S. Department of Transportation prescribes strict regulations for hazardous materials transport, as described in Title 49 of the Code of Federal Regulations (i.e., the Hazardous Materials Transportation Act); these are implemented by Title 13 of the California Code of Regulations. It is possible that vendors may transport hazardous materials to and from the Project; and the drivers of the transport vehicles must comply with the Hazardous Materials Transportation Act. Hazardous materials or wastes stored on site are subject to requirements associated with accumulation time limits, amounts, and proper storage locations and containers, and proper labeling. Additionally, for removal of hazardous waste from the site, hazardous waste generators are required to use a certified hazardous waste transportation company which must ship hazardous waste to a permitted facility for treatment, storage, recycling, or disposal.

With compliance with applicable regulations, operation of the Project would result in a less than significant impact related to a significant risk to the public or the environment through the potential routine transport, use, or disposal of hazardous materials. No mitigation is required.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Threshold b: Would the project 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?

Impact Analysis

The Phase I ESA prepared for the Project concludes that the Project site was historically undeveloped and/or agricultural in use. There are no structures or issues of concern at the Project site. No chemical use, storage, spills, or trash build up was identified during site visits. The site is in an area that has had historical agricultural activities, and the Phase I ESA did not find evidence of off-site facilities that have impacted the site. The Phase I ESA concludes there are no RECs, Controlled Recognized Environmental Conditions (CRECs), or Historical Recognized Environmental Conditions (HRECs) or other significant issues of concern. It is likely that agricultural-related chemicals including herbicides and pesticides were historically used in the Project area; however, review of historic aerial photographs did not indicate any areas of storage or mixing of pesticides and herbicides onsite.

Impact Analysis for Temporary Construction and Operation Activities

As identified in Section 4.6 of the PVCCSP EIR, the handling and transport of hazardous materials can result in accidental releases. However, with required compliance with federal, State, and City regulations, standards, and guidelines pertaining to hazardous materials management, proposed commercial and industrial developments would not create a significant hazard to the public or the environment from accident conditions related to the routine transport, use, or storage of hazardous materials. The impact was determined to be less than significant.

Accidents involving hazardous materials that could pose a significant hazard to the public or the environment would be highly unlikely during the construction and long-term operation of the Project and are not reasonably foreseeable. As discussed above under Threshold “a,” the transport, use, and handling of hazardous materials in the Project area during construction is a standard risk on all construction sites, and there would be no greater risk for upset and accidents than would occur on any other similar construction site. Upon buildout, the Project would operate as warehouse facilities and retail/commercial uses. Based on the operational characteristics of warehouse distribution, light industrial centers, and retail/commercial uses, it is possible that hazardous materials could be used during a future occupant’s routine, daily operations; however, as discussed under *Threshold a*, the Project would be required to comply with all applicable local, State, and federal regulations related to the transport, handling, and usage of hazardous material.

The Project would not 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 during construction operation. This includes exposure to hazardous materials from previous and current use of the Project area and surrounding areas, and accidental release of hazardous materials during construction and operation of the Project. This impact would be less than significant.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Threshold c: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impact Analysis

There are no existing or proposed schools within one-quarter mile of the Project area. The closest school is May Ranch Elementary school, located approximately 1 mile southeast of the Project site. Additionally, no schools are located along the designated truck routes that would be used for the Project. No impact related to emissions of hazardous materials within one-quarter mile of a school would occur.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

No impact would occur.

Threshold d: Would the project 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?

Impact Analysis

Based on the EDR Report included in the Phase I ESA (Appendix M of this Draft EIR), the Project site is not included on any regulatory agency database reports. Further, based on review of the California Environmental Protection Agency (CalEPA) Cortese List Data Resources, the Project site is not located on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (CalEPA 2020). Accordingly, no impact would occur.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

No impact would occur.

Threshold 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?

Impact Analysis

As previously identified, the nearest airport to the Project site is MARB/IPA located approximately 2.9 miles to the northwest. The Project area is within the AIA and the City's AOZ. Safety of people and property on the ground near MARB/IPA is of primary importance in achieving compatible land use. By limiting the number of people in a project area based on its proximity to the airport and the associated runway, the risk to these people is reduced. The safety zones and occupancy limits for the MARB/IPA are established in the 2014 MARB/IPA ALUCP.

Most of the Project site is located within Compatibility Zone D (Flight Corridor Buffer). There are no land use restrictions in this zone, no restrictions on the intensity of people at the site, and no open land requirement. Although no explicit upper limit on usage intensity is defined for Zone D, 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. The southwestern corner of the project site is within Compatibility Zone C1 (Primary Approach/Departure Zone). As presented in Table MA-2, Basic Compatibility Criteria, of the 2014 MARB/IPA ALUCP, Compatibility Zone C1 allows a non-residential, average land use intensity of 100 people per acre, and a single-acre land use intensity of 250 people per any single acre. Additionally, there is no "open land" requirement within Compatibility Zone C1. Because the Project site includes areas within Compatibility Zone C1 and Compatibility Zone D, this analysis applies only to the occupancy limits for portions of the Project site located within Compatibility Zone C1. The area of the Project that is subject to the Compatibility Zone C1 limits is just the portion of the warehouse building located entirely within Zone C1 (as intensity is not restricted for the portion of the building located in Zone D), which conservatively includes 41,237 square feet of manufacturing area, 2,500 square feet of first floor office area, and 2,500 square feet of second floor office mezzanine area, as well as up to 6,000 square feet of retail/restaurant uses, accommodating an occupancy of 230 people for the warehouse/office uses and 60 people for the retail/restaurant uses, resulting in an average intensity of 94 people per acre, which is consistent with Zone C1 average intensity criterion of 100 people per acre.

A second method for determining total occupancy involves multiplying the number of parking spaces provided or required (whichever is greater) by average vehicle occupancy (assumed to be 1.5 persons per vehicle and 1.0 persons per trailer truck space). Based on the number of parking spaces provided (325 standard vehicle spaces and 177 trailer spaces for the 36-acre warehouse building portion, as well as 172 standard vehicle spaces for the 4.8-acre western commercial retail portion), the total occupancy would be estimated at 923 people for an average intensity of 23 people per acre, which is consistent with the Compatibility Zone C1 average intensity criterion of 100 people per acre, and Zone D where intensity is not restricted. The Project would not have an occupancy level that would conflict with the applicable zones within the MARB/IPA ALUCP.

As identified on Table MA-2 of the 2014 MARB/IPA ALUCP, the ALUCP prohibits certain types of uses within Compatibility Zone C1: children's school, day care centers, libraries, hospitals, congregate care facilities, place of assembly, noise-sensitive outdoor non-residential uses. The Project does not involve any of these prohibited uses. Hazards to flight are prohibited in Compatibility Zone C1 and Zone D. Relevant to the Project, this includes physical (e.g., tall objects), visual, and electronic forms of

interference with the safety of aircraft operations. Additionally, land use development that may cause the attraction of birds to increase is also prohibited.

Section 4.11, *Noise*, of this Draft EIR addresses noise exposure for MARB/IPA operations. The MARB/IPA ALUCP depicts the site as being below the 60 CNEL range from aircraft noise. The Governor's Office of Planning and Research (OPR) Land Use Compatibility for Community Noise Exposure indicates that industrial uses, such as the Project, are considered normally acceptable with exterior noise levels of up to 70 dBA CNEL. The Project would not expose people working at the proposed Project site to excessive noise levels from airport operations. Therefore, no special measures are required to mitigate aircraft-generated noise.

On May 12, 2022, the ALUC unanimously found that the Project was consistent with the MARB/IPA ALUCP. The Project would be consistent with all land use, population, and physical constraints. Impacts to a safety hazard or excessive noise for people residing or working in the Project site as a result of proximity to an airport would be less than significant.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

A less than significant impact would occur.

Threshold f: Would the project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact Analysis

The City of Perris participates in the County of Riverside Multi-Jurisdictional Hazard Mitigation Plan (MHMP), which outlines requirements for emergency access and standards for emergency responses (County of Riverside EMD 2018). The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. During construction and long-term operation of the Project, adequate emergency access for emergency vehicles would have to be maintained along public streets that abut the Project site. Appropriate emergency ingress and egress would be available to-and-from the Project site and circulation on the Project site is adequate for emergency vehicles. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan and no impact would occur.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

No impact would occur.

Threshold g: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Impact Analysis

The Project area is in a portion of the City of Perris that is not located adjacent to any wildlands. According to the Perris General Plan Safety Element, the Project area and its surrounding area are not located within a wildfire hazard area (City of Perris 2016). Additionally, according to the California Department of Forestry and Fire Protection's (Cal Fire) Fire Hazard Severity Zone Viewer (FHSZV), the Project area is not located in a Very High Fire Hazard Severity Zone (VHFHSZ) of the City (CAL FIRE 2018). Accordingly, the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. No impact would occur.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

No impact would occur.

4.8.5 Cumulative Impacts

As discussed above under *Threshold a* and *Threshold b*, although the future occupant(s) of the proposed warehouse building and retail/commercial uses is not presently known, if a business that uses or stores hazardous materials occupies the Project site, the business owner and operator would be required to comply with all applicable federal, State, and local regulations to ensure proper use, storage, and disposal of hazardous substances. Such uses also would be subject to additional review and permitting requirements by the Riverside County Fire Department. Similarly, any other developments in the area proposing the construction of uses with the potential for use, storage, or transport of hazardous materials also would be required to comply with applicable federal, State, and local regulations, and such uses would be subject to additional review and permits from their local oversight agency. Therefore, the potential for release of toxic substances or hazardous materials into the environment, either through accidents or due to routine transport, use, or disposal of such materials, would be reduced to a less-than-cumulatively-significant level. Accordingly, the Project's potential to contribute to a cumulatively significant hazardous materials impact would be less than significant.

The Project site is not located within one-quarter mile of an existing or planned school; therefore, the Project would not contribute to a cumulatively significant hazards/hazardous materials impact on any public or private schools located within a one-quarter mile radius of the site.

The Project site is not located on the list of hazardous materials sites compiled pursuant to Government Code §65962.5. In the unlikely event hazardous materials are encountered beneath the surface of the site during grading or construction, the materials would be handled and disposed of in accordance with regulatory requirements. Therefore, the Project would not contribute to a cumulatively significant hazardous materials impact associated with a listed hazardous materials site.

The Project site is within the AIA for MARB/IPA and would not conflict with requirements outlined in the MARB/IPA ALUCP, PVCCSP, and PVCCSP EIR. The Project would have a less than significant impact related to the potential to result in a safety hazard or excessive noise for people residing or working in the Project area. Cumulative development within MARB/IPA's AIA would similarly be required to demonstrate consistency with the MARB/IPA ALUCP and adhere to requirements outlined in the PVCCSP

and PVCCSP EIR (for projects in the PVCCSP area). Therefore, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to aviation hazards.

The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route; thus, there is no potential for the Project to contribute to any cumulative impacts associated with an adopted emergency response plan or emergency evacuation plan.

As discussed above under *Threshold g*, the Project site is not located within or near areas identified as being subject to wildland fire hazards. Additionally, as the surrounding area continues to develop, lands that are currently vacant would be developed in a manner consistent with jurisdictional requirements for fire protection and would generally decrease the fire hazard potential in the local area. As such, within the cumulative context of the Project vicinity, fire hazards are anticipated to decline over time, and the Project's contribution to cumulative wildfire potential is less than cumulatively considerable.

4.8.6 References

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4.9 HYDROLOGY AND WATER QUALITY

This section identifies and evaluates the Project's potential to have adverse hydrology and water quality effects. Information presented in this section is based primarily on the following technical reports, which are included in their entirety in the Appendices of this EIR. References used in this section are listed in Section 4.9.6, References.

- United Engineering Group (UEG). 2022a. *Ramona Commercial, City of Perris, Riverside County, California, Preliminary Drainage Report*. September 2022. (Appendix N)
- United Engineering Group (UEG). 2022b. *Ramona Commercial, City of Perris, Riverside County, California, Project Specific Water Quality Management Plan*. January 25, 2023. (Appendix O)
- United Engineering Group (UEG). 2022c. *Ramona Industrial, City of Perris, Riverside County, California, Project Specific Water Quality Management Plan*. January 2023. (Appendix P)
- United Engineering Group (UEG). 2022d. *Ramona Industrial, City of Perris, Riverside County, California, Preliminary Drainage Report*. February 2022. (Appendix Q)

Comments relating to the issue of water quality were raised in response to the 2022 NOP for this EIR. Specifically, the Eastern Municipal Water District (EMWD) requested that possible impacts to EMWD facilities because of the Project be defined and consultation with the EMWD be undertaken. The EMWD also requests that a Design Conditions report be prepared for the Project. An additional commentor, B&B Gardner, LP, requested that the EIR review, address, and explain directly how all off-site infrastructure plans, including street and utility improvements pursuant to the conditions of approval deal with and prevent drainage issues for their property and all other properties adjacent to the Project site. The commentor additionally requests that the EIR address specific hydrology, drainage patterns, flooding hazards and ground water impacts for properties east of the Project site, as well as the risk of pollutants released due to inundation or any other known or unknown potential risks associated with water run-off, spill-over or other issues. There were no comments addressing hydrology and water quality raised at the July 20, 2022 Draft EIR public scoping meeting.

4.9.1 Existing Setting

4.9.1.1 Watershed Description

The Project area is in the San Jacinto Watershed, which is part of the larger Santa Ana River Watershed. The 24-mile-long San Jacinto River is the main drainage feature in this watershed and flows from the San Jacinto Mountains, across the San Jacinto Valley, through the City of Perris, to Railroad Canyon Reservoir, and finally to its terminus in Lake Elsinore, southwest of Perris (PVCCSP EIR). Lake Elsinore discharges into Temescal Wash, which is tributary to the Santa Ana River, which ultimately drains into the Pacific Ocean.

4.9.1.2 Hydrology and Water Quality Setting

The PVCCSP area, which includes the Project site, is relatively flat and generally slopes in a southeasterly direction towards the Perris Valley Storm Drain (PVSD) Channel. Existing City storm drains flow laterally

into the PVSD Channel from east to west and transport the flows through Perris Valley to Reach 3 of the San Jacinto River near I-215.

Under existing conditions, the site drains gradually northwest to southeast with varying terrain with a flow slope of 0.3 percent. The site is bordered by vacant land, commercial uses, and Ramona Expressway to the south. It has been graded in the past and shows evidence of continued disturbance and compaction. Some seasonal grasses are present. There are no flow paths through the site. The site is within the Perris Valley Master Drainage Plan (PVMDP) area, with the proposed Line E regional storm drain traversing the property.

4.9.1.3 Floodplain

Due to the area's relatively flat terrain and the lack of regional drainage infrastructure, flooding may occur in both major and minor storm events. During larger storm events, runoff creates flooding through the PVCCSP area and flows toward the PVSD Channel. As identified in the PVCCSP EIR, the Project area is located within a designated 100-year floodplain.

The Flood Insurance Rate Maps (Panel 06065C1430H) for the area shows that the Project site falls within Zone AE. Zone AE denotes areas determined to be within the one percent annual chance floodplain, with base flood elevations identified.

4.9.1.4 Groundwater

The Project site is located within the San Jacinto Groundwater Basin, which underlies the valleys of San Jacinto, Perris, Moreno Valley, and Menifee in western Riverside County. Natural recharge to the San Jacinto groundwater basin is primarily from percolation of flows into the San Jacinto River and its tributary streams, with percolation of water stored in Lake Perris as an additional source of recharge. As discussed in the PVCCSP EIR and the Initial Study for the Project, the PVCCSP area, including the Project area, is located within the EMWD's Perris North Groundwater Management Zone (PNMZ) of the West San Jacinto Groundwater Sub-basin. The PNMZ is located north of the San Jacinto River, and is bound by the impermeable, crystalline bedrock outcrops that compose the surrounding mountains and hills, which provide effective hard rock barriers to groundwater flow. The West San Jacinto Groundwater Management Plan, which provides for establishment of an advisory committee, prioritizes the sub-basins (including the PNMZ), and evaluates groundwater resources including establishing groundwater quality, level, and extraction monitoring.

4.9.2 Existing Policies and Regulations

4.9.2.1 Federal

Clean Water Act

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was substantially reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972. Under the CWA, the U.S. Environmental Protection Agency (USEPA) has implemented pollution control programs such as setting wastewater standards for industry, and has set water quality standards for all contaminants in surface waters. The CWA made it unlawful to discharge

any pollutant from a point source into navigable waters unless a permit was obtained. The USEPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters.

Federal Flood Insurance Program

The U.S. Congress established the National Flood Insurance Program (NFIP) with the passage of the National Flood Insurance Act of 1968. The NFIP is a Federal program enabling property owners in participating communities to purchase insurance as a protection against flood losses in exchange for State and community floodplain management regulations that reduce future flood damages. Participation in the NFIP is based on an agreement between communities and the Federal Government. If a community adopts and enforces a floodplain management ordinance to reduce future flood risk to new construction in floodplains, the Federal Government will make flood insurance available within the community as a financial protection against flood losses. This insurance is designed to provide an insurance alternative to disaster assistance to reduce the escalating costs of repairing damage to buildings and their contents caused by floods. The Federal Insurance and Mitigation Administration (FIMA) within the Federal Emergency Management Agency (FEMA) is responsible for administering the NFIP and administering programs that aid with mitigating future damages from natural hazards.

National Flood Insurance Program Reform Act of 1994

In 1994, the National Flood Insurance Program Reform Act went through the first major revision since inception. Included in this revision were provisions that a lender must escrow for flood insurance if a structure is within the floodplain. The revised legislation also included increased flood insurance limits and the elimination of the 1962 buy-out program. However, the legislation did initiate the Hazard Mitigation Fund as part of the flood insurance policy. Also included in this legislation was the increase from a 5-day to a 30-day waiting period for a new policy to become effective. It also prohibits the waiver of flood insurance purchase requirements as a condition of receiving federal disaster assistance. If the flood insurance policy was not maintained and in the event of another disaster, there would be no disaster assistance available for that structure.

Executive Order 11988 – Floodplain Management

Executive Order 11988 requires federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of flood plains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. In accomplishing this objective, "each agency shall provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by flood plains in carrying out its responsibilities" for the following actions:

- acquiring, managing, and disposing of federal lands and facilities;
- providing federally-undertaken, financed, or assisted construction and improvements; and

- conducting federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulation, and licensing activities.

4.9.2.2 State

Porter-Cologne Water Control Act

The Porter-Cologne Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code § 13000 et seq.), the policy of the State is as follows (CA Legislative 2023):

- That the quality of all the waters of the State shall be protected;
- That all activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason; and
- That the State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

The Porter-Cologne Act established nine Regional Water Boards (based on hydrogeologic barriers) and the State Water Board, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The State Water Board provides program guidance and oversight, allocates funds, and reviews Regional Water Boards decisions. In addition, the State Water Board allocates rights to the use of surface water. The Regional Water Boards have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The State Water Board and Regional Water Boards have numerous non-point source (NPS) related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

The Regional Water Boards regulate discharges under the Porter-Cologne Act primarily through issuance of NPDES permits for point source discharges and waste discharge requirements (WDRs) for NPS discharges. Anyone discharging or proposing to discharge materials that could affect water quality (other than to a community sanitary sewer system regulated by an NPDES permit) must file a report of waste discharge. The Storm Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) can make their own investigations or may require dischargers to carry out water quality investigations and report on water quality issues. The Porter-Cologne Act provides several options for enforcing WDRs and other orders, including cease and desist orders, cleanup and abatement orders, administrative civil liability orders, civil court actions, and criminal prosecutions.

The Porter-Cologne Act also implements many provisions of the Clean Water Act, such as the NPDES permitting program. The Porter-Cologne Act also requires adoption of water quality control plans that contain the guiding policies of water pollution management in California. In addition, regional water quality control plans (basin plans) have been adopted by each of the Regional Water Boards and get updated as necessary and practical. These plans identify the existing and potential beneficial uses of waters of the State and establish water quality objectives to protect these uses. The basin plans also contain implementation, surveillance, and monitoring plans. The Project site is located within the Santa

Ana River Watershed, which is within the purview of the Santa Ana RWQCB. The Santa Ana River Basin Plan (“Basin Plan”) is the governing water quality plan for the region.

California Water Code

The California Water Code is the principal state law regulating water quality in California. Water quality provisions must be complied with as contained in numerous code sections including: 1) the Health and Safety Code for the protection of ground and surface waters from hazardous waste and other toxic substances; 2) the Fish and Game Code for the prevention of unauthorized diversions of any surface water and discharge of any substance that may be deleterious to fish, plant, animal, or bird life; 3) the Harbors and Navigation Code for the prevention of the unauthorized discharge of waste from vessels into surface waters; and 4) the Food and Agriculture Code for the protection of groundwater which may be used for drinking water supplies. The California Department of Fish and Wildlife (CDFW), through provisions of the Fish & Game Code (§§ 1601 - 1603) is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. The CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by the CDFW.

Surface water quality is the responsibility of the RWQCB, water supply and wastewater treatment agencies, and city and county governments. The principal means of enforcement by the RWQCB is through the development, adoption, and issuance of water discharge permits. RWQCB basin plans establish water quality objectives that are defined as the limits or levels of water quality constituents or characteristics for the reasonable protection of beneficial uses of water.

California Toxics Rule

The California Toxics Rule (CTR) fills gaps in California’s water quality standards necessary to protect human health and aquatic life beneficial uses. The CTR criteria are similar to those published in the National Recommended Water Quality Criteria. The CTR supplements, and does not change or supersede, the criteria that USEPA promulgated for California waters in the National Toxics Rule (NTR). The human health NTR and CTR criteria that apply to drinking water sources (those water bodies designated in the Basin Plans as municipal and domestic supply) consider chemical exposure through consumption of both water and aquatic organisms (fish and shellfish) harvested from the water. For waters that are not drinking water sources (e.g., enclosed bays and estuaries), human health NTR and CTR criteria only consider the consumption of contaminated aquatic organisms. The CTR and NTR criteria, along with the beneficial use designations in the Basin Plans and the related implementation policies, are the directly applicable water quality standards for toxic priority pollutants in California waters.

Watershed Management Initiative

The State and Regional Water Boards are currently focused on looking at entire watersheds when addressing water pollution. The Water Boards adopted the Watershed Management Initiative (WMI) to further their goals. The WMI establishes a broad framework overlying the numerous federal and State mandated priorities. As such, the WMI helps the Water Boards achieve water resource protection, enhancement and restoration while balancing economic and environmental impacts (SWRCB 2017).

The integrated approach of the WMI involves three main ideas:

- Use water quality to identify and prioritize water resource problems within individual watersheds. Involve stakeholders to develop solutions.
- Better coordinate point source and nonpoint source regulatory efforts. Establish working relationships between staff from different programs.
- Better coordinate local, state, and federal activities and programs, especially those relating to regulations and funding, to assist local watershed groups.

Sustainable Groundwater Management Act

The 2014 Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. The DWR categorizes the priority of groundwater basins. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The SGMA also requires local public agencies and Groundwater Sustainability Agencies (GSAs) in high- and medium-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long term sustainability.

4.9.2.3 Regional and Local

Water Quality Control Plan for the Santa Ana River Basin

The Santa Ana RWQCB Water Quality Control Plan for the Santa Ana River Basin (Basin Plan) was originally adopted in 2005 and has been subsequently amended through June 2019 (RWQCB 2019). The Basin Plan is designed to preserve and enhance water quality and to protect the beneficial uses of all regional waters. Specifically, the Basin Plan: 1) designates beneficial uses for surface and subsurface waters (groundwater); 2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and to conform to the State's anti-degradation policy; 3) describes the implementation plan to achieve water quality objectives and to protect the beneficial uses of all waters in the region; 4) describes the comprehensive monitoring and assessment program used to evaluate the effectiveness of the Basin Plan; and 5) provides an overview of water resource management studies and projects which are in progress in the region. Additionally, the Basin Plan incorporates by reference all applicable State and Regional Board plans and policies.

The Basin Plan establishes or designates beneficial uses and water quality objectives for all the ground and surface waters in the region. Beneficial uses are the uses of water necessary for the survival and well-being of humans, plants, and wildlife. These uses serve to promote the tangible and intangible economic, social, and environmental goals. Water quality objectives are the levels of water quality constituents or characteristics that must be met to protect beneficial uses. The Basin Plan for the Santa Ana River Basin also establishes an implementation program that describes the actions that the Santa Ana RWQCB and others must achieve and maintain for the designated beneficial uses and water quality objectives of the region's waters.

Water bodies that do not meet water quality standards are deemed “impaired” and, under Section 303(d) of the CWA, are placed on a list of impaired waters for which a Total Maximum Daily Load (TMDL) must be developed for the impairing pollutant(s). A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality standards (with a “factor of safety” included). Once established, the TMDL is allocated among current and future pollutant sources to the water body. TMDLs must consider and include allocations to both point sources and non-point sources of listed pollutants.

Beneficial uses consist of all the various ways that water can be used for the benefit of people and/or wildlife. Nineteen beneficial uses are recognized within the Santa Ana Region. Nine beneficial uses have been designated for surface water bodies and groundwater in the vicinity of the PVCCSP and are shown in Table 4.9-1, *Beneficial Uses for Water Bodies in Proximity to the Project Area*. The definitions of the beneficial uses applicable to the Project area are as follows (RWQCB 2019):

- **Municipal and Domestic Supply (MUN):** Uses of water for community, military, municipal, or individual water supply systems including, but not limited to, drinking water supply.
- **Agricultural Supply (AGR):** Uses of water for farming, horticulture, or ranching including, but not limited to, irrigation, stock watering, or support of vegetation for range grazing.
- **Groundwater Recharge (GWR):** Uses of water for natural or artificial recharge of groundwater for purposes including, but not limited to, future extraction, maintaining water quality, or halting of saltwater intrusion into freshwater aquifers.
- **Industrial Supply (IND):** Waters for industrial service supply. These uses do not depend primarily upon water quality, and may include mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, and oil well re-pressurization.
- **Industrial Process Supply (PROC):** Waters for industrial process supply. Uses are for industrial activities that are dependent upon water quality. Uses may include process water supply and all uses of water related to product manufacture or food preparation.
- **Water Contact Recreation (REC1):** Uses of water for recreational activities involving bodily 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, white water 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 bodily contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.
- **Warm Freshwater Habitat (WARM):** Uses of water that support warm water ecosystems including, but not limited to, preservation and enhancement of aquatic habitats, vegetation habitats, and fish and wildlife habitats (including invertebrates).

- **Wildlife Habitat (WILD):** Uses of water that support wildlife habitat including, but not limited to, preservation and enhancement of vegetation and prey species used by waterfowl and other wildlife water.

**Table 4.9-1
BENEFICIAL USES FOR WATER BODIES IN PROXIMITY TO THE PROJECT AREA**

Water Body	Beneficial Uses
Lake Elsinore	REC 1, REC 2, WARM, WILD
Canyon Lake	AGR, GWR, RECI, REC2, WARM, WILD, MUN
San Jacinto River: Reaches 1, 2, & 3	AGR, GWR, RECI, REC2, WARM, WILD
Perris North - Groundwater Subbasin	AGR, MUN, IND, PROC

Source: PVCCSP EIR

The information provided in this table was extracted from California Regional Water Quality Control Board, Santa Ana Regional Water Quality Control Plan Santa Ana River Basin, 1995. (Available at RWQCB.)

Listed water quality objectives governing water quality in inland surface waters were evaluated for potential impacts from development of the PVCCSP; however, only those numeric and narrative water quality objectives that are most likely to be relevant to the proposed project are listed in Table 4.9-2, Water Quality Objectives for Water Bodies in Proximity to the Project Site and Table 4.9-3, Applicable Narrative Water Quality Objectives, respectively. Water quality standards are attained when designated beneficial uses are achieved and water quality objectives are being met. The regulatory program of the SARWQCB is designed to minimize and control pollutant discharges to surface and ground waters within the region, largely through permitting, such that water quality standards are effectively attained.

**Table 4.9-2
WATER QUALITY OBJECTIVES FOR WATER BODIES IN PROXIMITY TO THE PROJECT SITE**

Water Body	Water Quality Objectives (mg/L)						
Reaches within SJR:	TDS	Hardness	Na	Cl	TIN	S04	COD
Reach 1 - Lake Elsinore to Canyon Lake	450	260	so	65	3	60	15
Reach 2 - Canyon Lake	700	325	100	90	8	290	-
Reach 3 - Canyon Lake to Nuevo Road	820	400	-	250	6	-	15
Perris South - Groundwater Subbasin	1000	*	*	*	*	*	*

*The SARWQCB has not yet established numeric water quality objectives for these pollutants.

The information provided in this table was extracted from California Regional Water Quality Control Board, Santa Ana Regional Water Quality Control Plan Santa Ana River Basin, 1995. (Available at RWQCB.)

**Table 4.9-3
APPLICABLE NARRATIVE WATER QUALITY OBJECTIVES**

Bacteria, Coliform

REG1 Fecal coliform: log mean less than 200 organisms/100 mL based on five or more samples/30-day period, and not more than ten percent of the samples exceed 400 organisms/100 mL for any 30-day period.

REG2 Fecal coliform: average less than 2000 organisms/100 mL and not more than 10 percent of the samples exceed 4000 organisms/100 mL for any 30-day period.

Oil and Grease

Waste discharges shall not result in deposition of oil, grease, wax, or other materials in concentrations which result in a visible film or in coating objects in the water, or which cause a nuisance or adversely affect beneficial uses.

Solids, Suspended and Settleable

Inland surface waters shall not contain suspended or settleable solids in amounts which cause a nuisance or adversely affect beneficial uses as a result of controllable water quality factors.

All inland surface waters of the region shall be free of changes in turbidity which adversely affect beneficial uses.

Waste discharges shall not contain floating materials, including solids, liquids, foam, or scum, which cause a nuisance or adversely affect beneficial uses.

Nitrate

Nitrate-nitrogen concentrations shall not exceed 45 mg/L as (NO₃) or 10mg/L (as N) In inland surface waters designated MUN as a result of controllable water quality factors.

The information provided in this table was extracted from California Regional Water Quality Control Board, Santa Ana Regional Water Quality Control Plan Santa Ana River Basin, 1995. (Available at RWQCB.)

Riverside County Drainage Area Management Plan – Santa Ana Region

In compliance with the requirements of the Santa Ana Region MS4 Permit, the Riverside County Drainage Area Management Plan – Santa Ana Region (DAMP) (last updated in June 2017) was developed by the Riverside County Flood Control and Water Conservation District (RCFCWCD) to provide guidance to permittees on the development and implementation of Local Implementation Plans (LIPs) (RCFCWCD 2017). The Riverside County DAMP, which is applicable to the Santa Ana Watershed region of Riverside County, describes the program elements needed to comply with the MS4 Permit. It addresses the development of local storm water ordinances, grading/erosion ordinances, and litter/trash control ordinances, including illicit connections and illegal discharges. The requirements for post-construction urban runoff from new development and significant redevelopment projects through a WQMP, operation and maintenance of the MS4, and commercial and industrial facility inspection programs are also addressed. In June 2017, the DAMP was updated to include the approval of the Watershed Action Plan and its supporting documents.

Riverside County Master Drainage and Area Drainage Plans

The RCFCWCD prepares Master Drainage Plans (MDPs) to address the current and future drainage needs of various communities in Riverside County. MDP boundaries generally follow regional watershed limits. The MDPs provide a conceptual plan of proposed drainage facilities that may include channels, storm drains, levees, basins, dams, or any other conveyance capable of economically relieving flooding problems within the plan area. The MDPs also include an estimate of facility capacity, sizes, and costs. The PVM DP was adopted by the RCFCWCD in July 1987, was revised in June 1991 to merge the Lower Perris MDP and PVM DP, and addresses drainage infrastructure required for the 38-square-mile Perris Valley area (RCFCWCD 1991a). The infrastructure plans associated with the PVCCSP involve modifications to the PVM DP. The PVCMDP was adopted in October 1989 and addresses drainage needs along the PVSD Channel, which flows to the San Jacinto River (RCFCWCD 1989). The PVCMDP serves as a

long-term guide to the design and construction of the ultimate channel. It identifies the sizing and location of local drainage facilities to be constructed by developers and others within the area. The PVCCSP also anticipates the construction of other adopted PVMDP facilities to accommodate the 100-year storm flows in the area.

An Area Drainage Plan (ADP) is an implementing tool that identifies the storm drainage improvements for flood protection in the watershed, estimates the costs of constructing these improvements, and sets drainage fees to be collected from properties in the area covered by the plan and to be used for funding the construction of the drainage facilities. The Perris Valley ADP was adopted in July 1987 and revised in June 1991. The 1991 revisions included a slight change in the boundaries of the plan, adding completed storm drain facilities, and revising the fee allocation. The Perris Valley ADP includes storm drains 48 inches in diameter or larger, with smaller facilities to be constructed as part of individual development projects (RCFCWCD 1991b). Drainage fees are paid at the time of tentative map recordation or the grading/building permit stage.

Since 1991, additional storm drainage improvements have been built in the area. Also, as identified in the PVCCSP and associated EIR, an updated PVMDP will be needed to meet the PVCC development goals. The PVCCSP identifies a number of modifications to the PVMDP to provide flood protection to surrounding properties and roadways in the PVCCSP area. The City approved these improvements with adoption of the PVCCSP.

In addition to the modifications identified in the PVCCSP, other drainage facilities identified in PVMDP as well as channel improvements outlined in the PVSCMD need to be constructed. It is anticipated that drainage facilities would be constructed in conjunction with future development projects within the PVCCSP area. Relevant to the Project, this includes the Line E, which extends in an east-west direction across the Project site.

City of Perris Municipal Code

As identified in the PVCCSP EIR, the City of Perris Municipal Code identifies policies related to storm water runoff management. The specific Municipal Code policy that is relevant to the Project is as follows:

Chapter 14.22 Stormwater/Urban Runoff Management and Discharge Control. The intent of this chapter is to protect and enhance the water quality of water courses, water bodies, groundwater, wetlands, and regional receiving waters in the City, pursuant to and consistent with the Federal Clean Water Act (33 United States Code [USC], Section 1342) and California Regional Water Quality Control Board NPDES Permit No. CAS 618033, Order No. R8-2002-0011, and any amendment, revision or re-issuance thereof (Ord. 1194 Section 3[part], 2006)⁴. This ordinance sets guidelines for:

- A. Prohibiting non-storm water discharges into the storm water conveyance system;
- B. Eliminating discharges into the storm water conveyance system from spills, dumping or disposal of materials other than storm water or permitted or exempted discharges;
- C. Reducing pollutants in storm water discharges, including those pollutants taken up by storm water as it flows over urban areas (urban runoff), to the maximum extent practicable; and

- D. Reducing pollutants in storm water discharges to achieve applicable water quality.

City of Perris General Plan Conservation Element

The General Plan Conservation Element identifies goals related to water quality. These goals and policies and a discussion of the Project's consistency are discussed in Table 4.10-2, City of Perris General Plan Consistency Analysis, in Section 4.10, Land Use and Planning.

4.9.2.4 Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to hydrology and water quality. These Standards and Guidelines (summarized below) are incorporated as part of the Project's site development (the warehouse component) and are assumed in the analysis presented in this section. The chapters/section numbers provided correspond to the PVCCSP chapters/sections. There are no mitigation measures for hydrology and water quality included in the PVCCSP EIR.

General Design Considerations

Each implementing development project site will be graded, and buildings designed to the recommendations of the Geotechnical Engineering Investigation. Each implementing development project within the PVCCSP is required to implement Site Design Best Management Practices (BMPs) accomplishing each of four different techniques: 1) minimize urban runoff; 2) minimize impervious footprint; 3) conserve Natural Areas and 4) minimize directly connected impervious areas. Incorporation of Site Design BMPs will reduce potentially significant impacts to surface and groundwater resources.

With respect to overall drainage in the PVCCSP area, the drainage systems that will be developed in conjunction with the proposed PVCCSP will consist of two basic components: storm drains and detention basins. This drainage system will capture surface runoff from within the PVCCSP and surrounding area and convey the runoff into proposed storm drains and detention basins before continuing to the PVSD.

On-Site Design Standards and Guidelines (Chapter 4.0 of the PVCCSP)

4.2 On-Site Standards and Guidelines

4.2.1 General On-Site Project Development Standards and Guidelines

- Water Quality Management Plan
- Uses Affecting March Air Reserve Base: All retention and water quality basins shall be designed
- Easements on MWD Property

4.2.2 Site Layout for Commerce Zones

- 4.2.2.7 Water Quality Site Design

Off-Site Design Standards and Guidelines (Chapter 5.0 of the PVCCSP)

5.4 Off-Site Infrastructure Standards

5.4.4 Storm Drain Standards and Guidelines

- Riverside County Flood Control and Water Conservation District Standard
- Collect and Discharge Storm Water
- FEMA Floodplain
- On-Site Retention

Landscape Standards and Guidelines (Chapter 6.0 of the PVCCSP)

6.3 Planting Guidelines

- Erosion Control
- Positive Drainage to Street or Collection Device
- Concrete Gutters/Swales Are Prohibited Landscape Areas

Industrial Design Standards and Guidelines (Chapter 8.0 of the PVCCSP)

8.2 Industrial Development Standards and Guidelines

8.2.1 Industrial Site Layout

- 8.2.1.8 Water Quality Site Design: Runoff from Loading Docks; Truck-Wells.

Applicable Standard Regulatory Requirements

Adherence to NPDES requirements is required of all development within the City and would reduce Project-related impacts related to water quality. BMPs have been incorporated into the Project in compliance with these standard regulatory requirements.

4.9.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on hydrology and water quality if it will:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater 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) 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:

- a. Result in substantial erosion or siltation on or off site;
 - b. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;
 - c. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or
 - d. Impede or redirect flood flows;
- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or
- e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

4.9.4 Environmental Impacts

Threshold a: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Impact Analysis

The Santa Ana RWQCB sets water quality standards for all ground and surface waters within the Project's region. Water quality standards are defined under the Clean Water Act to include both the beneficial uses of specific water bodies and the levels of water quality that must be met and maintained to protect those water quality objectives. The proposed Project site is located within the Santa Ana Watershed and San Jacinto Sub-Watershed. Runoff from the PVCCSP area, including the Project site, discharges into the Perris Valley Storm Channel, which is tributary to the San Jacinto River, Canyon Lake, and Lake Elsinore.

Activities associated with the construction of the proposed Project would include grading, which may have the potential to release pollutants (e.g., oil from construction equipment, cleaning solvents, paint) and silt off-site which could impact water quality.

Potential water quality impacts associated with the proposed Project would be generally limited to short-term construction-related erosion and sedimentation. During operation, the discharge of minor amounts of fuels or other pollutants associated with automobiles into storm drains during rain events may occur. The Project would include construction of an underground stormwater basin and on-site storm drains in compliance with City design standards. Furthermore, the Project Applicant has prepared a preliminary WQMP to illustrate how low impact development Best Management Practices (BMPs) have been incorporated into Project construction and design. The WQMP incorporates BMPs in accordance with the California Stormwater BMPs Handbook and the City's BMP Design Manual to control erosion and protect the quality of surface water runoff.

As required under the NPDES, a SWPPP would be created specifically for construction of the proposed Project. The plan would address erosion control measures that would be implemented to avoid or minimize erosion impacts to exposed soil associated with construction activities. The SWPPP would include a program of BMPs to provide erosion and sediment control and reduce potential impacts to

water quality that may result from construction activities. BMPs would include providing gravel bags and silt fences where applicable. Through compliance with the regulatory requirements of the NPDES Statewide General Construction Permit and on-site drainage facilities, the Project is not expected to violate any water quality standards or waste discharge requirements during construction.

Development of the proposed Project would add impervious surfaces to the site through associated parking, loading areas, and drive aisles. By increasing the percentage of impervious surfaces on the site, less water would percolate into the ground and more surface runoff would be generated. Paved areas and streets would collect dust, soil and other impurities that would then assimilate into surface runoff during rainfall events. The Project would be required to comply with the NPDES permit and Waste Discharge Requirements for Riverside County, of which the City is a co-permittee. The City is responsible for discharges into its MS4 facilities to the extent of its legal authority and as required by federal regulations (40 C.F.R. §122.26(d)(2)(i)), the City shall control discharges of pollutants into the MS4 to the maximum extent practicable (MEP). Although not held liable for pollutants coming from outside sources, if the City authorizes the connection of other dischargers into their MS4 systems, the City is required by the Order to approve a written WQMP describing post-construction BMPs to control the discharges of pollutants into the MS4 to the MEP. The permittees are responsible for several plans to reduce pollutants in urban runoff, including a WQMP for certain new development and redevelopment projects. The proposed Project meets the threshold of a Priority Development Project since it involves more than 10,000 square feet of impervious surface.

The proposed Project incorporates site design, source controls and treatment control BMPs to address storm water runoff. Thus, through the BMPs combined with compliance with existing regulations such as the implementation of the WQMP, the proposed Project would not violate water quality standards or waste discharge requirements. Therefore, impacts are less than significant, and no mitigation would be required.

Mitigation Measures

The Project is required to comply with the applicable PVCCSP guidance. No mitigation is required.

Level of Significance After Mitigation

No mitigation required.

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?

Impact Analysis

The Project site is located within the San Jacinto Groundwater Basin, which underlies the valleys of San Jacinto, Perris, Moreno Valley, and Menifee in western Riverside County. Natural recharge to the San Jacinto groundwater basin is primarily from percolation of flows into the San Jacinto River and its tributary streams, with percolation of water stored in Lake Perris as an additional source of recharge.

While the majority of the site would become impermeable after development, project design features and BMPs such as the use of landscaping would facilitate some groundwater recharge and percolation. In addition, due to the proposed Project's size in relationship to the total size of the San Jacinto

Groundwater Basin and implementation of BMPs to identified in the Project's WQMP, there would not be a substantial effect upon groundwater recharge within the groundwater basin. The Project would rely on domestic water supply from the EMWD. It would not require the use of groundwater sources that would substantially deplete groundwater supplies. Therefore, impacts would be less than significant.

Mitigation Measures

The Project is required to comply with the applicable PVCCSP guidance. No mitigation is required.

Level of Significance After Mitigation

No mitigation required.

Threshold c: 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, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
- *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?*
- *or impede or redirect flood flows?*

Impact Analysis

There are no streams or rivers currently mapped within or around the Project site. Based on review of historic aerials, drainage on the Project site appears to flow from northwest to southeast. The site has been analyzed for surface water drainage in two separate WQMP's. They are divided into the commercial site to the south and the industrial site to the north that includes an additional 4.8 acres of planned commercial to the west. Both WQMP's are attached to this Draft EIR as Appendix O and Appendix P.

Commercial Site WQMP

The commercial site to the south is 5.7 gross acres, which includes street right of way. There are offsite flows that impact the property, with the Line E Master Plan flows proposed to be routed through the Project site. Onsite flows would be routed through underground storage and grassed swales. There is one area at the southwest corner that cannot be accepted into the Project's water quality treatment due to design grades. The primary use of swales is chosen due to the proximity of the Project site to MARB/IPA and the risk of bird strike from landings and takeoff of birds from any surface ponding source. Therefore, there is no bio-retention allowed. The site has no infiltration potential but does have subsurface storage proposed. It is proposed that before entering the underground detention the surface bio-swales will treat the runoff. Pumps and piping for this system would be designed at FWQMP stage.

Industrial Site WQMP (Includes the 4.8 Acres area planned for later Commercial to the West)

The 43.5 gross acre industrial site which includes street right of way. The property includes a proposed 4.8-acre commercial parcel without development plans and a 36.0-acre industrial parcel with complete development plans. The commercial area will be covered under a separate PWQMP in anticipation of a future property split. There is no co-mingling of flows, or any sharing of treatment BMP's. The industrial portion of the site (area covered under this PWQMP) is 36.0 acres. That includes 17.8 acres of building, 15.0 acres of hardscape (drive aisles, sidewalk, etc.), and 3.3 acres of landscaping. There are no offsite flows that impact the property, with only the Line E Master Plan flows proposed to be routed along the south side of the Project site. Onsite flows would be routed through underground storage and grassed swales. Three would be self-retaining. There is one area at the northeast corner that cannot be accepted into the Project's water quality treatment due to design grades. The use of swales is chosen due to the proximity of the Project site to MARB/IPA and the risk of bird strike from landings and take offs from any surface ponding source. Therefore, no bio-retention allowed. The site has no infiltration potential but does have subsurface storage proposed and required due to the sub grade loading bays. It is proposed that the underground detention be pumped to the surface bio-swales for WQMP treatment. Pumps and piping for this system would be designed at FWQMP stage.

Therefore, the proposed 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, in a manner which would result in substantial erosion or siltation onsite or offsite. Nor would it impede or redirect flood flows. Thus, impacts would be less than significant.

Mitigation Measures

The Project is required to comply with the applicable PVCCSP guidance. No mitigation is required.

Level of Significance After Mitigation

No mitigation required.

Threshold d: Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Impact Analysis

According to the Safety Element of the City General Plan, the Project site is not located within a Special Flood Hazard Area Inundated by 100-Year Flood Zone. However, the project site is within the Dam Inundation Area for the Lake Perris Dam (City of Perris 2022). The Department of Water Resources (DWR) has developed The Perris Dam Modernization Project, which is intended to make the dam more seismically resilient. The Perris Dam Modernization Project includes three projects: the Perris Dam Remediation Project, the Outlet Tower Improvements Project, and the Emergency Release Facility Project. The Perris Dam Remediation Project was completed in April 2018, the Outlet Tower Improvements Project is projected to be completed in 2026, and the Emergency Release Facility Project is projected for construction from 2023-2026 (DWR 2023a). This final phase of the Project is scheduled to begin construction in spring of 2025. Therefore, due to the unlikely event of a dam failure and through compliance with all applicable policies contained in the City's General Plan, impacts related to dam inundation are less than significant.

Additionally, the FEMA Flood Map Service Center identifies the Project site as not being mapped within a special flood hazard area (FEMA 2008). Therefore, impacts related to flood hazards would not occur. Tsunamis are usually caused by displacement of the ocean floor causing large waves and are typically generated by seismic activity. The proposed Project site is located approximately 34 miles from the Pacific Ocean and is separated from the ocean by mountains; therefore, risks from a tsunami are not present for the Project site. A seiche is a standing wave in an enclosed or partly enclosed body of water. Seiches are normally caused by earthquake activity, and can affect harbors, bays, lakes, rivers, and canals. The nearest body of water, Perris Reservoir, is approximately 2 miles away, which is too far to present impacts by a seiche event. Impacts relating to the release of pollutants due to tsunamis or seiches event would not occur.

Mitigation Measures

The Project is required to comply with the applicable PVCCSP guidance. No mitigation is required.

Level of Significance After Mitigation

No mitigation required.

Threshold e: Would the project conflict with or obstruct implementation of a water quality plan or sustainable groundwater management plan?

Impact Analysis

Implementation of the project would not have a substantial effect on groundwater recharge within the overlapping Perris North Groundwater Management Zone of the West San Jacinto Groundwater Sub-basin. Under the SGMA passed in 2014 (California Water Code Section 10729[d]), each high and medium priority basin, as identified by the DWR, is required to have a Groundwater Sustainability Agency (GSA) that will be responsible for groundwater management and development of a GSP (DWR 2023b).

Regarding groundwater recharge, the Project is consistent with the current (September 2021) GSP for the local groundwater basin, which outlines the efforts to be undertaken by local water suppliers to sustainably manage the basin by no later than 2042.

The Project would be supplied with imported, potable water and recycled water for non-potable water demands and the Project site is not within a groundwater recharge area. Therefore, the Project does not have the potential to conflict or obstruct implementation of a sustainable groundwater management plan and impacts would be less than significant and no mitigation would be required.

Mitigation Measures

The Project is required to comply with the applicable PVCCSP guidance. No mitigation is required.

Level of Significance After Mitigation

No mitigation required.

4.9.5 Cumulative Impacts

The geographic context for the Hydrology and Water Quality cumulative impact analysis is the Perris Valley/San Jacinto watershed hydrologic unit and the EMWD service area. Cumulative development within this watershed will increase the area of impervious surfaces, which will increase the amount of runoff, pollutant loads, reduce potential for groundwater recharge, and pose a greater number of people and structures to flood hazards.

Cumulative impacts to surface water and ground water quality could be significant with the addition of substantial increases in development and temporary construction activities in the San Jacinto River Watershed. These cumulative effects from stormwater and non-stormwater runoff include increased flow rates, increased erosion, increased sedimentation/siltation, higher concentrations of urban pollutants entering waterbodies and soil, and decreased potential for groundwater recharge. The proposed Project, along with all of the public and private development and construction projects in the watershed, are required to comply with current storm water regulations to reduce the discharge of pollutants to the maximum extent practicable from construction-related activities and post-construction operation of the site. Erosion control BMPs would be implemented during construction of the Project in compliance with the NPDES General Permit for Construction Activities. After construction, the proposed Project would implement the permanent runoff treatment systems identified in the Project-Specific Water Quality Management Plan (included as Appendix O and P to this DEIR).

Regarding groundwater recharge, the Project is consistent with the current (September 2021) GSP for the local groundwater basin, which outlines the efforts to be undertaken by local water suppliers to sustainably manage the basin by no later than 2042. Therefore, through implementation of existing regulations, project construction and long-term operations would not considerably contribute to significant cumulative impacts to water quality and groundwater recharge in the San Jacinto River Watershed.

Each development project in the San Jacinto River Watershed will be required to ensure that its contribution of runoff will not exceed the capacity of existing or planned stormwater drainage systems. The proposed Project includes off-site and on-site design features to ensure that runoff from the Project site, in conjunction with development of upstream properties will not individually or collectively overwhelm downstream drainage systems or properties.

All the thresholds related to surface and groundwater quality have been identified as less than significant without mitigation for this project with the detailed development of a preliminary WQMP. The same is true for the PVCCSP overall in the PVCCSP EIR. A detailed analysis of the potential cumulative impacts is provided in the PVCCSP EIR. No new information regarding water quality under the thresholds analyzed changed significantly beyond implementation of the proposed mitigation measures. The potential cumulative impacts relative to Hydrology and Water Quality would be less than significant.

4.9.6 References

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4.10 LAND USE AND PLANNING

This section describes the Project site and existing land uses in the surrounding area and evaluates the Project's consistency with the goals from the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and the policies of the City of Perris General Plan (including goals and policies), zoning, and the PVCCSP that have been adopted for the purpose of avoiding or mitigating an environmental effect. Information presented in this section is based on a review of relevant planning programs and site reconnaissance. References used in this section are listed below under Subsection 4.10.6, *References*.

There were no comments specific to land use and planning received in response to the 2022 and 2023 NOPs or at the July 20, 2022 Draft EIR public scoping meeting regarding land use and planning.

4.10.1 Existing Setting

4.10.1.1 Project Site

The approximately 45.1-acre Project site is located in the City of Perris in Riverside County within the PVCCSP area. The Project area is bordered by Perry Street to the north, Ramona Expressway to the south, Redlands Avenue to the east, and North Perris Boulevard to the west. The Project site is located approximately 1.7 miles east of Interstate (I-) 215, approximately 6.4 miles south of State Route (SR) 60, and approximately 1.4 miles south of March Air Reserve Base/Inland Port Airport (MARB/IPA). The Project site is located within the MARB Airport Influence Area Boundary and the City's Airport Overlay Zone. The Project site is located almost entirely within Airport Compatibility Zone D (Flight Corridor Buffer) with a small portion of the site located within Zone C1 (Primary Approach/Departure Zone). **Figures 3-2, Project Location and Vicinity** and **Figure 3-3, Aerial Photograph**, in Section 3.0, *Project Description*, of this EIR, depicts the regional location and local vicinity of the Project area.

As shown in the aerial photograph provided in **Figure 3-3**, the Project site is vacant and undeveloped, with an earthen reservoir and square concrete standpipe located on the western side of the Project site. The site can generally be characterized as disced and disturbed vacant land that was historically utilized for agricultural purposes. There are no structures present on the Project site. The Project site is generally flat with elevations ranging between 1,450 and 1,460 feet amsl, with stormwater runoff generally flowing to the southeast. An existing drainage swale is located along the north side of Ramona Expressway (i.e., along the southern edge of the project site), which is owned and maintained by the RCFCWCD and runs in an east-west direction connecting to the Perris Valley Storm Drain about 1,850 feet to the east of the Project site.

4.10.1.2 Surrounding Land Uses

As shown on **Figure 3-3**, land uses surrounding the Project site include a mix of undeveloped and developed land. Specifically, surrounding properties include undeveloped vacant land to the west, east and south; commercial uses to the west and south; industrial and warehouse development to the north and east; and a gas station and commercial uses immediately adjacent to the southwest. A mobile home park occurs approximately 300 feet south of the Project site at the closest point, while a Recreational Vehicle (RV) park is located approximately 150 feet to the southeast, beyond the existing commercial uses southeast of the intersection of Ramona Expressway and North Perris Boulevard.

4.10.1.3 General Plan and Zoning Designations

The current General Plan land use designation for the Project site is “PVCCSP – Perris Valley Commerce Center Specific Plan” (City of Perris 2013). The City of Perris Zoning Map identifies that the Project site is within the “PVCCSP – Perris Valley Commerce Center Specific Plan” area and identifies the PVCCSP land use designations for areas within the PVCCSP (City of Perris 2020). See **Figure 4.10-1, Perris Valley Commerce Center Specific Plan Land Use Designations**. A discussion of the PVCCSP is provided in Section 4.10.2 below. The Project site is zoned as Commercial in the PVCCSP.

4.10.2 Existing Policies and Regulations

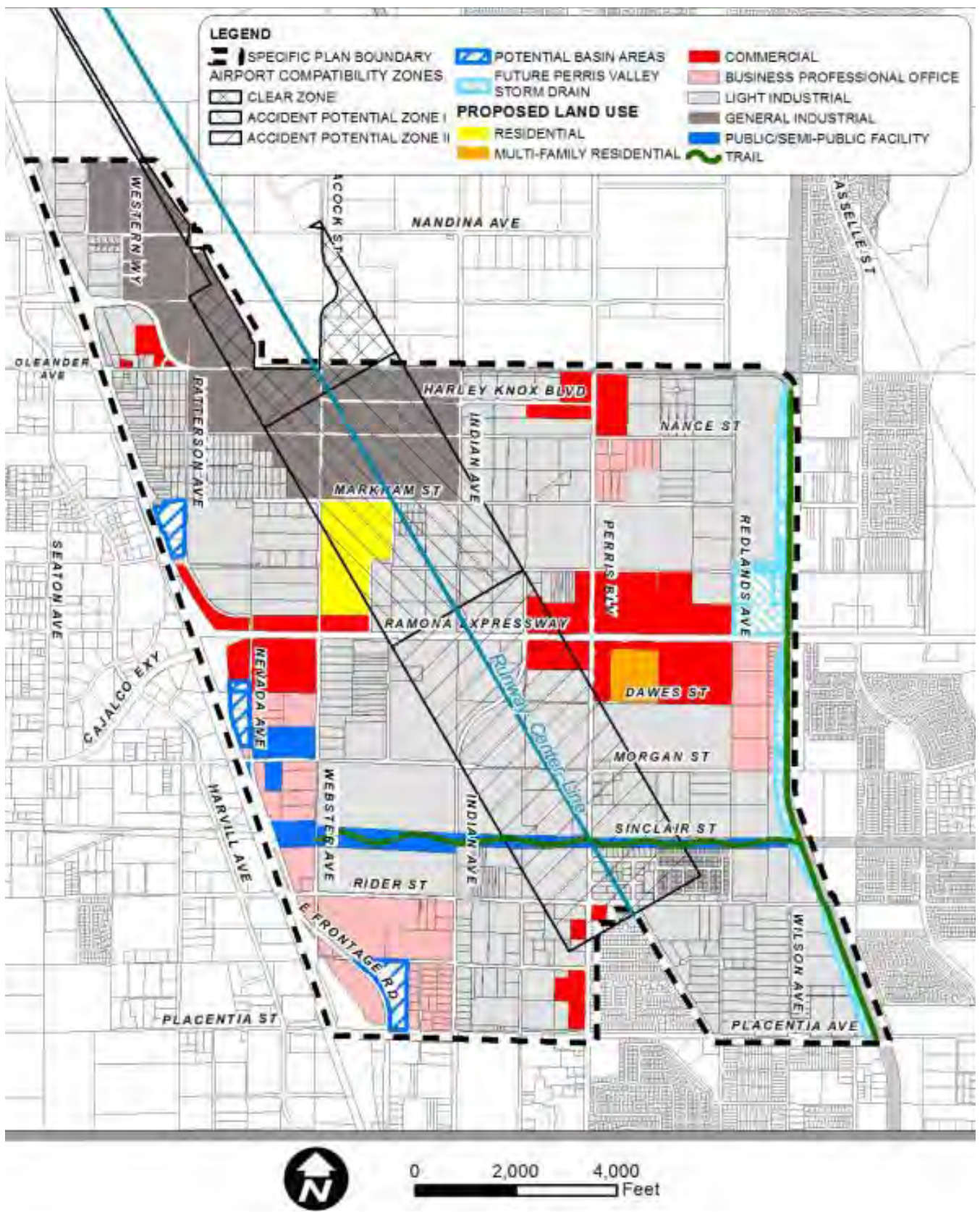
The following is a brief description of the federal, State, regional and Local environmental laws and related regulations related to land use and planning.

4.10.2.1 Regional

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, SCAG adopted the 2020-2045 RTP/SCS (also referred to herein as Connect SoCal; SCAG 2020). Connect SoCal is a major planning document for the regional transportation and land use network. It balances the region’s future mobility and housing needs with economic, environmental, and public health goals. This long-range Plan, required by the state of California and the federal government, is updated by SCAG every four years as demographic, economic, and policy circumstances change. The goals of Connect SoCal fall into four core categories – economy, mobility, environment, and health/complete communities. Connect SoCal includes the following goals: (1) Encourage regional economic prosperity and global competitiveness; (2) Improve mobility, accessibility, reliability, and travel safety for people and goods; (3) Enhance the preservation, security, and resilience of the regional transportation system; (4) Increase person and goods movement and travel choices within the transportation system; (5) Reduce greenhouse gas emissions and improve air quality; (6) Support healthy and equitable communities; (7) Adapt to a changing climate and support an integrated regional development pattern and transportation network; (8) Leverage new transportation technologies and data-driven solutions that result in more efficient travel; (9) Encourage development of diverse housing types in areas that are supported by multiple transportation options; and (10) Promote conservation of natural and agricultural lands and restoration of habitats.

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Source: City of Perris 2022

Connect SoCal also includes an appendix titled “Goods Movement” that is applicable to the Project because the Project entails the development of warehouse buildings in the SCAG region that could support a variety of light industrial, warehousing, and logistics users. In April 2018, SCAG published *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region’s freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, state highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet of warehouse building space, and undeveloped land that could accommodate an additional 338 million square feet of new warehouse building space. These regions attract robust logistics activities and are a major reason why the region is a critical mode in the global supply chain (SCAG 2018).

4.10.2.2 Local

City of Perris General Plan

The City of Perris General Plan 2030 (General Plan) was approved in April 2005 and includes land use policies and land use maps to guide the future development of the City of Perris. As shown in Exhibit LU-1: Planning Areas, of the General Plan Land Use Element, the City of Perris is divided into 10 planning areas to provide more detailed land use and policy direction regarding local issues (e.g., land use circulation and open space). The planning areas are defined by similarities and opportunities in land uses, development patterns, and future developments. Most of the Project area lies within Planning Area 1: North Industrial. This area is generally made up of “industrial” land use designations and uses. While there are some residential uses in this area, the majority of land uses are nonresidential. A small amount of the southern border of the project site is in Planning Area 3: Agricultural Conversion Area. Planning Area 3 consists of large tracts of land used primarily for agriculture when the Land Use Element was prepared. Proximity to the I-215 corridor suggests conversion of agricultural land, over the long term, to uses that are compatible with surrounding commercial and industrial uses (City of Perris 2016a).

The Perris General Plan consists of eight elements, including new or updated elements since approval of the General Plan in 2005. The General Plan elements address issues that affect the City, and include Housing, Land Use, Circulation, Conservation and Sustainable Community, Noise, Safety, Open Space, and Healthy Community. All activities undertaken by a planning agency must be consistent with the goals and policies of the agency’s general plan. The City of Perris General Plan’s Land Use Element plays a central planning role in correlating all City land use issues, goals, and objectives into one set of development policies. The Land Use Element includes a Land Use Map (referred to as the General Plan Map), which was updated on January 3, 2013. As previously discussed, the Project area is designated “PVCCSP – Perris Valley Commerce Center Specific Plan” on the General Plan Land Use Map (City of Perris 2013).

Specific policies of the respective elements of the City’s General Plan that are relevant to the Project in the context of land use and planning impacts are provided below. The policies from the City’s Housing Element are not identified below since the Project does not include any proposed residential uses.

Circulation Element

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 (refer to City of Perris General Plan).

Policy I.B - Support development of a variety of transportation options for major employment and activity centers including direct access to commuter facilities, primary arterial highways, bikeways, park-n-ride facilities, and pedestrian facilities.

Policy I.D - Encourage and support the development of projects that facilitate and enhance the use of alternative modes of transportation.

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.

Policy III.A - Implement a transportation system that accommodates and is integrated with new and existing development and is consistent with financing capabilities.

Policy IV.A - Provide non-motorized alternatives for commuter travel as well as recreational opportunities that maximize safety and minimize potential conflicts with pedestrians and motor vehicles.

Policy V.A - Provide for safe movement of goods along the street and highway system.

Policy VII.A - Implement the Transportation System in a manner consistent with federal, State, and local environmental quality standards and regulations.

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.

Conservation Element

Policy II.A - Comply with state and federal regulations to ensure protection and preservation of significant biological resources.

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.

Policy IV.A - Comply with state and federal regulations and ensure preservation of the significant historical, archaeological, and paleontological resources.

Policy V.A - Coordinate land-planning efforts with local water purveyors.

Policy VI.A - Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).

Policy VII.A - Preserve significant hillsides and rock outcroppings in the planning areas.

Policy IX.A - Encourage land uses and new development that support alternatives to the single occupant vehicle.

Policy X.B - Encourage the use of trees within project design to lessen energy needs, reduce the urban heat island effect, and improve air quality throughout the region.

Policy X.C - Encourage strategic shape and placement of new structures within new commercial and industrial projects.

Land Use Element

Policy II.A - Require new development to pay its full, fair share of infrastructure costs.

Policy II.B - Require new development to include school facilities or pay school impact fees, where appropriate.

Policy III.A - Accommodate diversity in the local economy.

Policy V.A - Restrict development in areas at risk of damage due to disasters.

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.

Policy II.A - Appropriate measures shall be taken in the design phase of future roadway widening projects to minimize impacts on existing sensitive noise receptors.

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.

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.

Open Space Element

Policy I.B - Developers will only receive credit for parkland dedication requirements for actual land used for, in lieu-fees contributed to, or improvements made upon active parkland.

Policy II.A - All development will be accessible by a trail system.

Policy III.A - Preserve hillsides and rock outcroppings in the planning areas.

Safety Element

Policy S-2.1 - Require road upgrades as part of new development remodels to ensure adequate evacuation and emergency vehicle access. Limit improvements for existing building sites to property frontages.

Policy S-2.2 - Require new development or major remodels include backbone infrastructure master plans substantially consistent with the provisions of “Infrastructure Concept Plans” in the Land Use Element.

Policy S-2.5 - Require all new developments, redevelopments, and major remodels to provide adequate ingress/egress, including at least two points of access for sites, neighborhoods, and/or subdivisions.

Policy S-4.1 - Restrict future development in areas of high flood hazard potential until it can be shown that risk is or can be mitigated.

Policy S-4.3 - Require new development projects and major remodels to control stormwater runoff on site.

Policy S-4.4 - Require flood mitigation plans for all proposed projects in the 100-year floodplain (Flood Zone A and Flood Zone AE).

Policy S-5.3 - Promote new development and redevelopment in areas of the City outside the VHFHSZ and allow for the transfer of development rights into lower-risk areas, if feasible.

Policy S-5.6 - All developments throughout the City Zones are required to provide adequate circulation capacity, including connections to at least two roadways for evacuation.

Policy S-5.10 - Ensure that existing and new developments have adequate water supplies and conveyance capacity to meet daily demands and firefighting requirements.

Policy S-6.1 - Ensure new development and redevelopments comply with the development requirements of the AICUZ Land Use Compatibility Guidelines and ALUP Airport Influence Area for March Air Reserve Base.

Policy S-6.2 - Effectively coordinate with March Air Reserve Base, Perris Valley Airport, and the March Inland Port Airport Authority on development within its influence areas.

Policy S-6.3 - Effectively coordinate with March Air Reserve Base and Perris Valley Airport on development within its influence areas.

Policy S-7.1 - Require all development to provide adequate protection from damage associated with seismic incidents.

Policy S-7.2 - Require geological and geotechnical investigations by State-licensed professionals in areas with potential for seismic and geologic hazards as part of the environmental and development review and approval process.

Policy S-8.2 - Ensure that the transport, use, storage, and disposal of hazardous materials occur in a responsible manner that protects public health and safety.

Healthy Community Element

Policy HC 1.3 - Improve safety and the perception of safety by requiring adequate lighting, street visibility, and defensible space.

Policy HC 2.1 - Implement the Perris Trail Master Plan.

Policy HC 2.3 - Promote increased physical activity, reduced driving, increased walking, cycling, and public transit by:

- Requiring where appropriate the development of compact development patterns that are pedestrian and bicycle friendly Increasing opportunities for active transportation (walking and biking) and transit use.
- Increasing opportunities for active transportation (walking and biking) and transit use.
- Encouraging the development of neighborhood grocery stores that provide fresh produce.

Policy HC 2.4 - Promote development patterns and policies that:

- Reduce commute times.
- Encourage the improvement of vacant properties and the reinvestment in neighborhoods.
- Provide public space for people to congregate and interact socially.
- Foster safe and attractive environments.

Policy HC 2.6 - Encourage land use and urban design to promote physical activity, provide access to nutritious foods, and reduce air pollution.

Policy HC 3.1 - Coordinate with transportation service providers and transportation planning entities to improve access to multi-modal transportation options throughout Perris including public transit.

Policy HC 3.5 - Promote job growth within Perris to reduce the substantial out-of-Perris job commutes that exist today.

Policy HC 4.1 - Promote public spaces that foster positive human interaction and healthy lifestyles.

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.

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

Policy 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 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.

Environmental Justice Element

- Continue to ensure new development is compatible with the surrounding uses by co-locating compatible uses and using physical barriers, geographic features, roadways, or other infrastructure to separate less compatible uses. When this is not possible, impacts may be mitigated using: noise barriers, building insulation, sound buffers, traffic diversion.
- As part of the development review process, require conditions that promote Good Neighbor Policies for Industrial Development for industrial buildings larger than 100,000 square feet. The conditions shall be aimed at protecting nearby homes, churches, parks, day-care centers, schools, and nursing homes from air pollution, noise lighting, and traffic associated with large warehouses, making them a “good neighbor.”
- Inform existing industries of the state 5-minute maximum idling limitation and condition new industrial projects to enforce the state’s 5-minute maximum idling limitation for stationary diesel trucks.
- Require developers to provide pedestrian and bike friendly infrastructure in alignment with the vision set in the City’s Active Transportation Plan or active transportation in-lieu fee to fund active mobility projects.

City of Perris Title 19 Zoning Code

The City of Perris Zoning Ordinance (Municipal Code, Title 19) contains the regulatory framework that specifies allowable uses for real property and development intensities; the technical standards such as site layout, building setbacks, heights, lot coverage, and parking; aesthetics related to physical appearance, landscaping, and lighting; a program that implements policies of the General Plan; and the procedural standards for amending or establishing new zoning regulations.

As previously identified, the Project area also has a zoning designation of “PVCCSP – Perris Valley Commerce Center Specific Plan¹” Specific Plans are documents that establish a specific link between implementing policies of the General Plan and the individual development proposals in a defined area. A Specific Plan may be as general as setting forth broad policy concepts, or as detailed as providing direction to every facet of development from the type, location, and intensity of uses to the design and capacity of infrastructure, and from the resources used to finance public improvements to the design guidelines of a subdivision. After a Specific Plan has been adopted, subsequent subdivision and

¹ The California Government Code (Title 7, Division 1, Article 8, Section 65450) grants authority to Cities to adopt Specific Plans for purposes of implementing the goals and policies of their General Plans. The California Government Code states that Specific Plans may be adopted either by Resolution or by Ordinance and that the Specific Plan is required to be consistent with the General Plan. (City of Perris 2018)

development, public works projects, and zoning regulations must be consistent with the Specific Plan (City of Perris 2022a).

The following is a discussion of the PVCCSP, which is the basis for future development in the PVCCSP area, including the Project area.

Perris Valley Commerce Center Specific Plan

The PVCCSP was adopted by the City of Perris in January 2012 (Ordinance No. 1284) and was last amended in March 2023. The PVCCSP is the culmination of a multi-year planning effort through which the City engaged in planning efforts to ascertain the appropriate land uses in the northwestern area of the City in light of the existence of MARB/IPA to the north, the development of logistics warehouse uses surrounding MARB/IPA, and the changing economic conditions. The City identified the intent of the PVCCSP as follows (City of Perris 2022):

“The intent of the Perris Valley Commerce Center Specific Plan is to provide high quality industrial, commercial, and office land uses to serve the existing and future residents and businesses of the City of Perris. The plan will promote recognition throughout the region for its aesthetic cohesiveness, superior land planning, and architectural design.”

The objectives of the PVCCSP seek to promote various land uses for the area, to streamline the development process, to promote sustainable development through the encouragement of “green” technologies, to provide a strong sense of place by establishing an identity for the area, and to identify infrastructure utility needs and to provide plans for vehicular and non-vehicular circulation.

In compliance with the requirements of the California Government Code, the PVCCSP adopted a comprehensive land use plan, infrastructure plan, and design Standards and Guidelines. The City of Perris uses the Specific Plan Standards and Guidelines to evaluate development projects subject to discretionary review within the PVCCSP boundaries. Relevant PVCCSP Standards and Guidelines that are incorporated into the Project are listed in the introduction to the analysis for each topical issue in Section 4.0, *Environmental Impact Analysis*, of this EIR and are assumed in the analysis presented.

Allowed land uses within each PVCCSP land use designation is presented in Table 2.0-2, *Land Use*, of the PVCCSP. As discussed, the Project site is designated primarily for Commercial uses. Any change to the PVCCSP boundaries, land use designations, land use allowances, development criteria, circulation plan, public facility plan, or other major component require a Specific Plan Amendment.

4.10.2.3 Applicable PVCCSP Standards and Guidelines and Mitigation Measures

On-Site Design Standards and Guidelines (Chapter 4.0 of the PVCCSP)

The PVCCSP includes Standards and Guidelines relevant to land use and planning. These Standards and Guidelines (summarized below) are incorporated as part of the Project and are assumed in the analysis presented in this section. The chapters/section numbers provided correspond to the PVCCSP chapters/sections. There are no mitigation measures for land use and planning included in the PVCCSP EIR.

4.2 On-Site Standards and Guidelines

4.2.1 General On-Site Project Development Standards and Guidelines

- Uses and Standards Shall be Developed in Accordance with the Specific Plan or Specific Plan Amendments.
- Uses and Standards Shall be Developed in Accordance with City of Perris Codes.
- Development Shall be Consistent with the Perris Valley Commerce Center Specific Plan.
- No Changes to Development Procedures Except as Outlined in the Specific Plan.

4.2.2 Site Layout for Commercial Zones

- 4.2.2.1 Building Orientation/Placement: Building Frontages/Entrances; Distinct Visual Link; Create Diversity and Sense of Community; and Utilize Building for Screening
- 4.2.2.4 Parking and Loading: Screening Parking Lot
- 4.2.2.5 Screening: Screen Loading Docks; Screening Methods; Screen Outdoor Storage Areas; Work Areas, etc.
- 4.2.2.6 Outdoor Storage: No Outdoor Storage Permitted Other Than as Specified
- 4.2.2.7 Water Quality Site Design: Best Management Practice (BMP) Features in “Visibility Zone”

City of Perris Good Neighbor Guidelines

Adoption of the City of Perris Good Neighbor Guidelines (GNG 2022) formalizes what is expected industrial development (City 2022c). Implementation of the GNG will be applied through Conditions of Approval.

4.10.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, impacts to land use and planning may be considered potentially significant if the project would:

- a) Physically divide an established community; or
- b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Potential land use compatibility issues include such potential impacts as unsuitable noise levels, unsafe traffic conditions, offensive views, odors, and air, water quality degradation, and jobs to housing balance. Such compatibility issues can become very subjective. What is a nuisance or concern about a neighboring use for one business owner or individual may not be a problem for the next. Each of these compatibility issues is identified and discussed as objectively as possible in the following sections of this document: *Agricultural Resources* (Section 6.0), *Air Quality* (Section 4.2), *Biological Resources*

(Section 4.3), *Hazards and Hazardous Materials* (Section 4.8), *Hydrology and Water Quality* (Section 4.9), *Noise* (Section 4.11), and *Transportation* (Section 4.12). If impacts for each of these topics are determined to be less than significant, then land uses are considered compatible and potential land use compatibility impacts are not considered to be significant.

Consistency with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and the Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) are contained in Section 4.3 (Biological Resources) of this EIR. The Air Quality Section of this EIR (Section 4.2) discusses consistency with the applicable Air Quality Management Plan. Consistency with applicable Airport Land Use Compatibility Plans is discussed in Section 4.8 (Hazards and Hazardous Materials) of this EIR. Consistency with regional water quality plans is discussed in Section 4.9 (Hydrology and Water Quality) and the Eastern Municipal Water District (EMWD) Urban Water Management Plan is discussed in Section 4.14 (Utilities and Service Systems) of this EIR.

4.10.4 Environmental Impacts

Threshold a: Would the project physically divide an established community?

Impact Analysis

The PVCCSP EIR Initial Study concludes that the PVCCSP area includes some vacant and agricultural land, but is otherwise developed with light industrial, industrial, commercial, and business park uses. Development of the PVCCSP would not divide or disrupt travel between different parts of the City. The PVCCSP is intended to unify the PVCCSP area to create a higher quality neighborhood. The Initial Study concludes that implementation of the PVCCSP would not divide an established community (City of Perris 2009).

As shown in **Figure 3-2** of this EIR, the Project site is vacant and undeveloped. The land uses surrounding the Project site are within the PVCCSP area and include undeveloped vacant land to the west, east, and south; commercial uses to the west and south; industrial and warehouse development to the north and east; and a gas station and commercial uses immediately adjacent to the southwest. A mobile home park occurs approximately 300 feet south of the Project site at the closest point, while a RV park is located approximately 150 feet to the southeast, beyond the existing commercial uses southeast of the intersection of Ramona Expressway and North Perris Boulevard. As with the Project, development of the areas surrounding the Project site would be implemented in accordance with the PVCCSP. The Project involves the development of industrial and commercial uses.

While the Project includes a proposed zoning change from Commercial to Light Industrial for a portion of the Project site, the overall proposed uses for the Project (commercial and warehouse uses) are consistent with development and infrastructure improvements anticipated by the PVCCSP and similar to existing and planned surrounding uses. Rather than dividing a community, the PVCCSP intends to bring the area together as a unified neighborhood for higher quality business development including industrial, commercial, and office uses. The Project would not physically divide an established community and no impact would occur.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

There would be no impact.

Threshold b: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact Analysis

The PVCCSP EIR concludes that implementation of future development and infrastructure projects in compliance with the PVCCSP would not conflict with any applicable land use plan, policy, or regulation (City of Perris 2011). The project would be consistent with the previously analyzed PVCCSP aside from the Specific Plan Amendment that is required to change a portion of the site's Commercial zoning to Light Industrial, which includes warehouse facilities as a permitted use. The PVCCSP contains a variety of industrial uses but does not apply industrial zoning for this specific site. The project does include 9.5 acres of proposed commercial space, which is consistent with the current zoning.

An analysis of the Project's consistency with existing regional and local plans (including applicable goals and policies) is provided below.

Consistency with SCAG Regional Transportation Plan/Sustainable Communities Strategy

Connect SoCal seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region by balancing future mobility and housing needs with economic, environmental, and public health goals. Connect SoCal contains ten goals related to economy, mobility, environment, and healthy/complete communities. Table 4.10-1, *SCAG Connect SoCal Policy Consistency Analysis*, presents the Project's consistency with the Connect SoCal goals. As demonstrated in the table, the Project would not conflict with or create inconsistencies with Connect SoCal.

Table 4.10-1
SCAG CONNECT SOCIAL POLICY CONSISTENCY ANALYSIS

Connect SoCal Goal	Project Consistency Discussion
1. Encourage regional economic prosperity and global competitiveness.	No Conflict. This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive local and regional planning efforts. The Project implements the PVCCSP. The PVCCSP Design Standards and Guidelines intend to create eco- friendly, high-quality developments to establish a regional character that identifies the community. The PVCCSP area is highly sought after due to rapid regional growth, available land, a locally available employee base, proximity to major transportation routes and MARB/IPA. The PVCCSP seeks to unify the area’s character and develop a business community that fosters long-term economic success. Through the utilization of an established set of Guidelines, the PVCCSP, of which the Project would be located within, creates mixed-use developments that are aesthetically pleasing while respecting the basic industrial/commercial use and function of the Specific Plan. The Project would involve the development of a vacant site and although a rezone to change the Specific Plan land use designation would be required for the warehouse portion of the Project site, the Project would continue development of the PVCCSP in support of regional economic prosperity and the global supply chain. No conflict with this goal would occur.
2. Improve mobility, accessibility, reliability, and travel safety for people and goods.	No Conflict. The Project involves industrial and commercial development within the PVCCSP area and is located approximately 1.4 miles from the I-215. Trucks traveling to/from the Project site would be required to access PVCCSP-designated truck routes. Roadway improvements are not required for, or proposed as part of, the Project. No conflict with this goal would occur.
3. Enhance the preservation, security, and resilience of the regional transportation system.	No Conflict. This goal would be implemented by cities and counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system. As disclosed in Section 4.12, <i>Transportation</i> , of this EIR, the Project Applicant would construct site access improvements and pay applicable traffic mitigation fees that would fund additional traffic improvements and maintenance of roadway infrastructure in the PVCCSP area. The Project would not hinder the City’s or other agency efforts to enhance the regional transportation system and no conflict with this goal would occur.
4. Increase person and goods movement and travel choices within the transportation system.	No Conflict. As discussed in Section 4.12, <i>Transportation</i> , of this EIR, the Project would construct site access and non-vehicular pedestrian circulation improvements. In addition to the site access and pedestrian improvements, the Project developers would pay applicable traffic mitigation fees (e.g., North Perris Road and Bridge Benefit District [NPRBBD] fees) that would fund additional traffic improvements in the study area (consistent with the PVCCSP Circulation Plan) and maintenance of roadway infrastructure in the Project area.

Connect SoCal Goal	Project Consistency Discussion
5. Reduce greenhouse gas emissions and improve air quality.	No Conflict. Air quality and GHG emissions are discussed in sections 4.2, <i>Air Quality</i>, and 4.7, <i>Greenhouse Gas Emissions</i>, of this EIR. As discussed in those sections, the Project would implement PVCCSP EIR and Project-specific mitigation measures to reduce air quality impacts to the maximum feasible extent. However, the Project would result in significant and unavoidable impacts to air quality and greenhouse gas emissions. All feasible and applicable mitigation measures were considered to reduce air quality and greenhouse gas emissions to the extent feasible. Additionally, a key objective of the PVCCSP is to promote sustainable development and to encourage the use of “green” technologies. In addition to complying with the California Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings and the Title 24 California Green Building Standards Code (CALGreen Code), the Project incorporates PVCCSP EIR mitigation measures that serve to conserve energy and reduce greenhouse gas emissions.
6. Support healthy and equitable communities.	No Conflict. This policy pertains to health and equitable communities and these issues are addressed through goals and policies outlined in the Healthy Community and Environmental Justice Elements of the City of Perris General Plan (City 2022b). As discussed in Table 4.10-2 below, the Project would not conflict with policies established by the City to provide a healthy and equitable community.
7. Adapt to a changing climate and support an integrated regional development.	No Conflict. A key objective of the PVCCSP is to promote sustainable development and to encourage the use of “green” technologies. The Project would comply with the California Title 24 Energy Efficiency Standards for Nonresidential Buildings and the CALGreen Code, and the Project would incorporate PVCCSP EIR mitigation measures that serve to conserve energy and reduce greenhouse gas emissions to the extent feasible. However, the Project would result in significant and unavoidable impacts to air quality and greenhouse gas emissions. All feasible and applicable mitigation measures were considered to reduce air quality and greenhouse gas emissions to the extent feasible. In regard to an integrated regional development, according to Connect SoCal, there have been significant drivers of change in the goods movement industry including emergency emerging and new technologies, more complex supply chain strategies, evolving consumer demands, and shifts in trade policies. Warehouse distribution and e-commerce continues to be one of the most influential factors shaping trends in supply chain and logistics. The Project includes the development and operation of an industrial warehouse building that is designed to meet contemporary industry standards and operational characteristics. The Project’s industrial component would accommodate a wide variety of users and would be economically competitive with similar industrial buildings in the local area and region. Further, the Project involves development of a vacant site historically used for agricultural production with retail and industrial uses that would diversify the City’s economy and bring employment opportunities closer to the local workforce.

Connect SoCal Goal	Project Consistency Discussion
8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	No Conflict. Connect SoCal indicates that the advancement of automation is expected to have considerable impacts throughout regional supply chains. Notably, warehouses, such as that proposed with the Project, are increasingly integrating automation to improve operational efficiencies in response to the surge in direct-to-consumer e-commerce. Additionally, continued developments and demonstrations of automated truck technologies will alter the goods movement environment with far-reaching impacts ranging from employment to highway safety. The Project would meet contemporary industry standards and operational characteristics relative to transportation technologies and data-driven solutions. The Project would not conflict with this policy.
9. Encourage development of diverse housing types in areas that are supported by multiple transportation options.	No Conflict. The Project site is located within an area developed with and planned for industrial and commercial uses. No additional housing is proposed within the PVCCSP area. The Project would not convert land planned or used for housing, nor would it include the construction of housing. The Project would not conflict with the goal for encouraging development of diverse housing types.
10. Promote conservation of natural and agricultural lands and restoration of habitats.	No Conflict. The PVCCSP and its surrounding areas are in transition from a historically agricultural area to commerce center. While the undeveloped Project site would be converted from vacant to industrial and commercial land uses, the conversion would not include the loss of active farmland. The Project site is not currently in use for agricultural production and is within an area planned for the development of industrial, commercial, and business park uses. As discussed in Section 4.3, <i>Biological Resources</i> , of this EIR, the Project would be implemented in compliance with Western Riverside MSHCP requirements and incorporates Project-specific mitigation measures to ensure biological impacts would be less than significant. Thus, the Project would not conflict with the goal of promoting conservation of natural and agricultural lands and restoration of habitats.

Consistency with City of Perris General Plan

The City of Perris General Plan was approved in 2005, and as subsequently amended, serves as the main land use policy document for the City. Therefore, future development in the City must comply with the General Plan's goals and policies. The State's general rule for a General Plan consistency determination is that "an action, program, or project is consistent with the General Plan if, considering all its aspects, it will further the objectives and policies of the General Plan and not obstruct their attainment" (OPR 2017).

The PVCCSP EIR addresses the PVCCSP's consistency with the City's General Plan that were in effect at the time of PVCCSP adoption and concluded that the PVCCSP would not result in inconsistencies with the General Plan. The Project would be consistent with applicable policies contained in the General Plan that have been adopted for the purpose of avoiding or mitigating an environmental effect as described below and outlined in Table 4.10-2, *City of Perris General Plan Policy Consistency Analysis*. As identified in Table 4.10-2, the Project would not conflict with applicable policies of the City's General Plan that have been adopted for the purpose of avoiding or mitigating an environmental effect.

Table 4.10-2
CITY OF PERRIS GENERAL PLAN POLICY CONSISTENCY ANALYSIS

Applicable Elements, Goals, Policies, and Actions	Consistency Evaluation
Circulation Element	
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 (refer to City of Perris General Plan).	No Conflict. Although not required to determine whether the Project would have a significant transportation impact pursuant to CEQA, a traffic analysis was prepared for the Project and was used to determine the improvements that are required to be constructed to implement the PVCCSP's Circulation Plan, consistent with the City's General Plan for the Future Roadway Network. As described in Section 4.12, <i>Transportation</i>, of this EIR, the Project would include site access improvements, including driveways into the Project site, to accommodate Project circulation needs, as identified by the Project traffic analysis. The Project would not conflict with this policy.
Policy I.B. Support development of a variety of transportation options for major employment and activity centers including direct access to commuter facilities, primary arterial highways, bikeways, park-n-ride facilities, and pedestrian facilities.	No Conflict. Site access improvements would be constructed for the Project, including construction of sidewalk, curb-and-gutter, and landscaping improvements adjacent to the Project site along Ramona Expressway, Perris Boulevard, and Perry Street. The City's Active Transportation Plan includes a recommended Buffered Bike Lane (Class IIB) along Perris Boulevard, adjacent to the west of the Project site, and a recommended Separated Bikeway (Class IV) along Ramona Expressway, adjacent to the south of the Project site. The Project would not preclude the future development of the ATP recommended bikeways or development of the planned Ramona Expressway Trail. As discussed in Section 4.12, <i>Transportation</i>, of this EIR, the Project includes the provision of bicycle racks, as required by PVCCSP EIR mitigation measure MM Trans 5. There are several transit stops along Perris Boulevard, including two within 150 feet of the Project site, which would provide access to the Project via public transit. The Project would not conflict with this policy.
Policy I.D. Encourage and support the development of projects that facilitate and enhance the use of alternative modes of transportation.	No Conflict. As discussed in response to Policy I.B above, the Project site is located in close proximity to two existing transit stops, which would provide access to the Project via public transit. Further, the Project includes the provision of bicycle racks consistent with PVCCSP mitigation requirements and would not preclude the future development of the ATP recommended bikeways or development of the planned Ramona Expressway Trail. No conflict with this policy would occur.

Applicable Elements, Goals, Policies, and Actions	Consistency Evaluation
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.	No Conflict. The Project maintains the existing roadway network and provides options for non-vehicular modes of travel based on the demand determined by the Project traffic analysis. No conflict with this policy would occur.
Policy III.A. Implement a transportation system that accommodates and is integrated with new and existing development and is consistent with financing capabilities.	No Conflict. The Project incorporates a transportation system that accesses the existing roadways in the area to support existing development and the Project. The payment of NPRBBD fees, including TUMF and City of Perris DIF, would fund additional traffic improvements to General Plan roadways in the area and would contribute toward the maintenance of roadway infrastructure in the area. No conflict with this policy would occur.
Policy IV.A. Provide non-motorized alternatives for commuter travel as well as recreational opportunities that maximize safety and minimize potential conflicts with pedestrians and motor vehicles.	No Conflict. The Project site is near two existing transit stops, which would provide for access to the Project via public transit. Further, the Project would provide bicycle racks consistent with PVCCSP mitigation requirements, and would not preclude the future development of the ATP recommended bikeways or development of the planned Ramona Expressway Trail. No conflict with this policy would occur.
Policy V.A. Provide for safe movement of goods along the street and highway system.	No Conflict. The Project would include a warehouse use that would utilize the City-designated truck route to access I-215. Additionally, the Project would implement site access improvements, as detailed in Section 4.12, <i>Transportation</i> , of this EIR. Improvements would be completed according to the standards and requirements set forth by the City of Perris and in coordination with the City Engineer to ensure that Project-related improvements are safe. Project site access improvements, combined with the Project's use of City-designated truck routes, would provide for the safe movement of goods along the street and highway system. No conflict with this policy would occur.
Policy VII.A. Implement the Transportation System in a manner consistent with federal, State, and local environmental quality standards and regulations.	No Conflict. This EIR has been prepared in accordance with the State CEQA Guidelines. Further, although not required to determine transportation impacts pursuant to CEQA, a traffic analysis has been prepared for the Project in accordance with the guidance provided by the City of Perris, the County of Riverside, and Caltrans. Through the required public review of the EIR, local, State, and federal agencies can comment on the Project and its consistency with the applicable standards and regulations. By considering the comments of these agencies in the EIR and throughout the development process, the Project would maintain consistency with federal, State, and local environmental quality standards and regulations. No conflict with this policy would occur.

Applicable Elements, Goals, Policies, and Actions	Consistency Evaluation
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.	No Conflict. As discussed in the Air Quality section of this EIR, the proposed warehouse operator(s) would be subject to South Coast Air Quality Management District (SCAQMD) Rule 2202, On-Road Motor Vehicle Mitigation Options as well as Project-specific mitigation measure MM AQ-7 to implement TDM programs at the Project site. Further, the Project would provide bicycle racks consistent with PVCCSP mitigation requirements and would not preclude the future development of the ATP recommended bikeways or development of the planned Ramona Expressway Trail. No conflict with this policy would occur.
Conservation Element	
Policy II.A. Comply with state and federal regulations to ensure protection and preservation of significant biological resources.	No Conflict. As discussed in Section 4.3, Biological Resources, of this EIR, biological studies were prepared for the Project. Vegetation at the Project site consists of approximately 41.1 acres of non-native grasslands, and approximately 7.0 acres of disturbed/developed lands (acreage for the biological resources study area include off-site areas outside the Project site boundaries, and therefore, vegetation acreage totals identified here slightly exceed the Project site acreage), and does not support special-status vegetation communities, riparian habitat, sensitive plant communities, or state or federally protected wetlands. The Project would be implemented in compliance with Western Riverside MSHCP requirements and incorporates Project-specific mitigation measures to ensure biological impacts would be less than significant. Thus, the Project would comply with state and federal regulations to ensure protection and preservation of significant biological resources and would not conflict with this policy.

Applicable Elements, Goals, Policies, and Actions	Consistency Evaluation
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.	No Conflict. As discussed in Section 4.3, <i>Biological Resources</i>, of this EIR, the Project site is not within an MSHCP Cell, Cell Group, or Sub Unit of the MSHCP and conservation is not required for the Project site. The Project site is within the Burrowing Owl Survey Area and Narrow Endemic Plant and Criteria Area Species Surveys Areas, and surveys were conducted as required. A Habitat Assessment was prepared for the Project site, which summarizes the results of the biological assessment. Project-specific mitigation measure MM Bio-1 requires completion of wet season fairy shrimp focused surveys and the preparation of a Determination of Biologically Equivalent or Superior Preservation Report, if fairy shrimp are identified on the Project site during wet season surveys and cannot be avoided. The Habitat Assessment concludes that, with implementation of PVCCSP EIR and Project-specific mitigation measures, the Project would not result in a significant impact related to MSHCP consistency.
Policy IV.A. Comply with state and federal regulations and ensure preservation of the significant historical, archaeological, and paleontological resources.	No Conflict. As required by PVCCSP EIR mitigation measure MM Cultural 1, a Phase I Cultural Resources Study was conducted for the Project to assess potential impacts to historic and archaeological resources. As discussed in Section 4.4, <i>Cultural Resources</i>, of this EIR, with implementation of Project-specific mitigation measures, the Project would result in less-than-significant impacts associated with historic and archaeological resources. Likewise, as discussed in Section 4.6, <i>Geology and Soils</i>, of this EIR, with implementation of Project-specific mitigation measures, the Project would result in less-than-significant impacts associated with paleontological resources. Based on the Project-specific technical studies prepared for the Project, and implementation of required mitigation, the Project would comply with state and federal regulations to ensure preservation of significant historical, archaeological, and paleontological resources.
Policy V.A. Coordinate land-planning efforts with local water purveyors.	No Conflict. As discussed in Section 4.14, <i>Utilities and Service Systems</i>, of this EIR, a Water Supply Assessment (WSA) was prepared for the Project by the Eastern Municipal Water District (EMWD), the local water purveyor. The WSA concludes that the EMWD has sufficient water supplies to serve the Project and future uses from the EMWD's entitlements and resources.

Applicable Elements, Goals, Policies, and Actions	Consistency Evaluation
Policy VI.A. Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).	No Conflict. As discussed in Section 4.9, <i>Hydrology and Water Quality</i> , of this EIR, adherence to NPDES requirements is required of all development within the City. The Project would comply with NPDES requirements and no conflict with this policy would occur.
Policy VII.A. Preserve significant hillsides and rock outcroppings in the planning areas.	No Conflict. The proposed Project site is void of any hillsides or rock outcroppings. The Project would not conflict with this policy.
Policy IX.A. Encourage land uses and new development that support alternatives to the single occupant vehicle.	No Conflict. As discussed in response to Policy I.B above, the Project site is located in close proximity to two existing transit stops, which would provide for access to the Project via public transit. Further, the Project would provide bicycle racks consistent with PVCCSP mitigation requirements, and would not preclude the future development of the ATP recommended bikeways or development of the planned Ramona Expressway Trail. No conflict with this policy would occur.
Policy X.B. Encourage the use of trees within project design to lessen energy needs, reduce the urban heat island effect, and improve air quality throughout the region.	No Conflict. The Project would provide landscaping, including various tree species, as required by the PVCCSP. Trees would be planted around the Project perimeter, adjacent to the proposed buildings, and through parking areas. The landscape plan would be subject to review and approval by the City prior to Project implementation to ensure the proposed landscaping is consistent with City requirements. No conflict with this policy would occur.
Policy X.C. Encourage strategic shape and placement of new structures within new commercial and industrial projects.	No Conflict. An objective of the PVCCSP is to promote sustainable development. The Project would promote energy conservation by taking advantage of natural lighting and ventilation, sunlight, and shade, as appropriate, based on site conditions. No conflict with this policy would occur.

Applicable Elements, Goals, Policies, and Actions	Consistency Evaluation
Land Use Element	
Policy II.A. Require new development to pay its full, fair share of infrastructure costs.	No Conflict. The PVCCSP includes an Infrastructure Plan that identifies the utility infrastructure necessary to serve the allowed development in the PVCCSP planning area. Each individual development, including the Project, is required to implement the infrastructure needed to serve its proposed uses. The Project would include the installation of on-site storm drain, water quality, water, sewer, electric, natural gas, and telecommunications infrastructure systems to serve the Project and would include the construction of an extension of the planned Line E storm drain box culvert, as discussed in Section 4.9, <i>Hydrology and Water Quality</i>, of this EIR. Additionally, the Project developers would pay applicable traffic mitigation fees (e.g., North Perris Road and Bridge Benefit District [NPRBBD] fees) that would fund additional traffic improvements in the study area (consistent with the PVCCSP Circulation Plan) and maintenance of roadway infrastructure in the Project area. The Project would not conflict with this policy.
Policy II.B. Require new development to include school facilities or pay school impact fees, where appropriate.	No Conflict. As required by Government Code Section 65995, the Project developers would be required by state law pay the required applicable developer fees to the Val Verde Unified School District prior to the issuance of building permits. The Project would not conflict with this policy.
Policy III.A. Accommodate diversity in the local economy.	No Conflict. The Project involves development of a vacant site historically used for agricultural production with retail and industrial uses that would diversify the City's economy and bring employment opportunities closer to the local workforce. The Project would not conflict with this policy.

Applicable Elements, Goals, Policies, and Actions	Consistency Evaluation
Policy V.A. Restrict development in areas at risk of damage due to disasters.	No Conflict. As discussed in Section 4.6, <i>Geology and Soils</i>, of this EIR, the Project site is not located within an Alquist-Priolo Earthquake Fault zone. Project structures are required to be designated and constructed to resist the effects of seismic ground motions as provided in the 2019 California Building Code. Proper foundation design, remedial grading, and other seismic safety features would be required for all Project structures in accordance with all applicable building codes and construction requirements. Further, compliance with the requirements of the PVCCSP EIR mitigation measures and the Project-specific geotechnical report would be required to ensure that potential impacts associated with geological risks are less than significant. Further, the Project has been designed to mitigate flooding impacts, as discussed in Section 4.10, <i>Hydrology and Water Quality</i>, of this EIR. The Project site is in the dam inundation zone for the Lake Perris Reservoir, which is located to the northeast of the Project site (City 2021); however, as discussed in Section 4.10, <i>Hydrology and Water Quality</i>, of this EIR, impacts associated with dam failure would be less than significant. The Project site is not located in a Wildfire Hazard Area (City 2005). The Project would not conflict with this policy.
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.	No Conflict. As discussed in Section 4.11, <i>Noise</i>, of this EIR, based on State of California Noise/Land Use Compatibility Criteria presented in Exhibit N-1 of the General Plan Noise Element, commercial uses are considered normally acceptable with exterior noise level below 65 dBA CNEL, conditionally acceptable with exterior noise levels below 75 dBA CNEL, and normally unacceptable with exterior noise level above 75 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 noise levels between 70 to 80 dBA CNEL. Existing noise sources in the Project area consists of transportation-related noise generated on area roadways and overflight noise associated with MARB/IPA. As discussed in Section 4.11, <i>Noise</i>, of this EIR, the Project site is located outside of the 60 dBA CNEL noise contour for MARB/IPA. No conflict with this policy would occur.
Policy II.A. Appropriate measures shall be taken in the design phase of future roadway widening projects to minimize impacts on existing sensitive noise receptors.	No Conflict. The proposed Project does not include or require any road widening. The Project would not conflict with this policy.

Applicable Elements, Goals, Policies, and Actions	Consistency Evaluation
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.	No Conflict. The proposed commercial and industrial uses are not considered to be sensitive noise land uses. As discussed in Section 4.11, <i>Noise</i> , of this EIR, the Project site is located outside of the 60 dBA CNEL noise level contour boundaries for MARB/IPA Airport. No conflict with this policy would occur.
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.	No Conflict. As discussed in Section 4.11, <i>Noise</i> , of this EIR, the Project would result in less than significant noise impacts and would comply with PVCCSP EIR mitigation measures to further reduce noise associated with Project construction. No conflict with this policy would occur.
Open Space Element	
Policy I.B. Developers will only receive credit for parkland dedication requirements for actual land used for, in lieu-fees contributed to, or improvements made upon active parkland.	No Conflict. The Project does not include and would not require the construction of new or expanded park facilities. However, as required by the City of Perris, the Project developers would be required to pay applicable Development Impact Fees, including fees for community amenities.
Policy II.A. All development will be accessible by a trail system.	No Conflict. The planned Ramona Expressway Regional Trail is planned for the north side of Ramona Expressway, adjacent to the Project site, running east and west. The trail would connect the County Regional Trail on the east to Metrolink on the west side of I-215, and extend to the Lake Perris Fairgrounds. When construction of the Ramona Expressway Regional Trail is complete, the Project would be accessible by trail. No conflict with this policy would occur.
Policy III.A. Preserve hillsides and rock outcroppings in the planning areas.	No Conflict. The proposed Project site is void of any hillsides or rock outcroppings. The Project would not conflict with this policy.
Safety Element	
Policy S-2.1. Require road upgrades as part of new development remodels to ensure adequate evacuation and emergency vehicle access. Limit improvements for existing building sites to property frontages.	No Conflict. As discussed in Section 4.12, <i>Transportation</i> , of this EIR, the Project would include sidewalks and several points of site access. There are eight driveways proposed for the Project, which would be constructed consistent with the City of Perris design requirements, including the Fire Department's requirement of a minimum 20-foot width for driveways. Because of this, emergency vehicles would be able to access the Project site. The Project would not conflict with this policy.

Applicable Elements, Goals, Policies, and Actions	Consistency Evaluation
Policy S-2.2. Require new development or major remodels include backbone infrastructure master plans substantially consistent with the provisions of “Infrastructure Concept Plans” in the Land Use Element.	No Conflict. The Project would include the installation of on-site storm drain, water quality, water, sewer, electric, natural gas, and telecommunications infrastructure systems to serve the Project, which would connect to existing utilities in the vicinity of the Project site or new utility lines that would be installed within the public right-of-way adjacent to the Project site. Project plans, including infrastructure improvements, would be submitted to the City Engineer for review and approval prior to the issuance of grading permits. City review and approval of project plans, including the installation of infrastructure to support the Project would ensure that the Project would not conflict with this policy.
Policy S-2.5. Require all new developments, redevelopments, and major remodels to provide adequate ingress/egress, including at least two points of access for sites, neighborhoods, and/or subdivisions.	No Conflict. The Project would include the construction of eight driveways for Project site access. Access to the site would be provided via driveways on Perris Boulevard, Perry Street, and Ramona Expressway. The Project would not conflict with this policy.
Policy S-4.1. Restrict future development in areas of high flood hazard potential until it can be shown that risk is or can be mitigated.	No Conflict. As discussed in Section 4.9, <i>Hydrology and Water Quality</i>, of this EIR, the Project has been designed with underground storm water storage, with a system of sump pumps that would be used to dewater the underground stormwater system. The pumps would convey the water to bio-swales that would be constructed as part of the Project, before discharging to the planned Line E storm drain system. The Project would include the construction of a network of paved access within the site to convey storm runoff into the underground system. As discussed in Section 4.9, the Project would not result in significant impacts associated with flooding. The Project would not conflict with this policy.
Policy S-4.3. Require new development projects and major remodels to control stormwater runoff on site.	No Conflict. The Project would implement the necessary improvements to control stormwater runoff, as discussed in Section 4.9, <i>Hydrology and Water Quality</i>, of this EIR. Infrastructure improvements would include the construction of an extension of the planned Line E storm drain box culvert, which would be constructed below grade along the southern edge of the warehouse
	portion of the Project site, then turning to the southeast beneath the retail portion of the Project site and continuing eastward to either terminate at the eastern edge of the Project site or continuing onto and through the off-site property immediately adjacent to the east. The Project would not conflict with this policy.

Applicable Elements, Goals, Policies, and Actions	Consistency Evaluation
Policy S-4.4. Require flood mitigation plans for all proposed projects in the 100-year floodplain (Flood Zone A and Flood Zone AE).	No Conflict. The Project site is in the 100-year floodplain and would include the preparation of flood mitigation plans. As discussed for Policy S-4.1 above, the Project includes the construction of an underground storm water storage system to retain storm flows, which would then be pumped to bio-swales for treatment prior to discharge to the Line E storm drain system. The Project would not conflict with this policy.
Policy S-5.3. Promote new development and redevelopment in areas of the City outside the VHFHSZ and allow for the transfer of development rights into lower-risk areas, if feasible.	No Conflict. As discussed in Section 4.8, <i>Hazards and Hazardous Materials</i> , the Project area is not located in a Very High Fire Hazard Severity Zone (VHFHSZ) of the City. The Project would not conflict with this policy.
Policy S-5.6. All developments throughout the City Zones are required to provide adequate circulation capacity, including connections to at least two roadways for evacuation.	No Conflict. As discussed in Section 4.12, <i>Transportation</i> , of this EIR, the Project would include sidewalks and several points of site access. There are eight driveways proposed for the Project, which would be constructed consistent with the City of Perris design requirements, including the Fire Department's requirement of a minimum 20-foot width for driveways. Because of this, emergency vehicles would be able to access the Project site. The Project would not conflict with this policy.
Policy S-5.10. Ensure that existing and new developments have adequate water supplies and conveyance capacity to meet daily demands and firefighting requirements.	No Conflict. The Project includes the installation of water infrastructure to serve the Project, which would be sized during final design to meet the water demand requirements for firefighting. As discussed in Section 4.14, <i>Utilities and Service Systems</i> , of this EIR, a Water Supply Assessment (WSA) was prepared for the Project by the EMWD, the local water purveyor. The WSA concludes that the EMWD has sufficient water supplies to serve the Project and future uses from the EMWD's entitlements and resources.
Policy S-6.1. Ensure new development and redevelopments comply with the development requirements of the AICUZ Land Use Compatibility Guidelines and ALUP Airport Influence Area for March Air Reserve Base.	No Conflict. As discussed in Section 4.8, <i>Hazards, and Hazardous Materials</i> , of this EIR, the Project is within the Airport Influence Area for MARB/IPA; however, it would not conflict with the requirements of the MARB/IPA ALUCP, as discussed in detail in Section 4.8. On May 12, 2022, the Riverside County Airport Land Use Commission unanimously found that the Project was consistent with the MARB/IPA ALUCP. The Project would not conflict with this policy.
Policy S-6.2. Effectively coordinate with March Air Reserve Base, Perris Valley Airport, and the March Inland Port Airport Authority on development within its influence areas.	No Conflict. On May 12, 2022, the Riverside County Airport Land Use Commission unanimously found that the Project was consistent with the MARB/IPA ALUCP. The Project site is not within the Perris Valley Airport influence area. The Project would not conflict with this policy.

Applicable Elements, Goals, Policies, and Actions	Consistency Evaluation
Policy S-6.3. Effectively coordinate with March Air Reserve Base and Perris Valley Airport on development within its influence areas.	No Conflict. On May 12, 2022, the Riverside County Airport Land Use Commission unanimously found that the Project was consistent with the MARB/IPA ALUCP. The Project site is not within the Perris Valley Airport influence area. The Project would not conflict with this policy.
Policy S-7.1. Require all development to provide adequate protection from damage associated with seismic incidents.	No Conflict. As discussed in Section 4.6, <i>Geology and Soils</i> , of this EIR, Project structures are required to be designated and constructed to resist the effects of seismic ground motions as provided in the 2019 California Building Code. Proper foundation design, remedial grading, and other seismic safety features would be required for all Project structures in accordance with all applicable building codes and construction requirements. No conflict with this policy would occur.
Policy S-7.2. Require geological and geotechnical investigations by State-licensed professionals in areas with potential for seismic and geologic hazards as part of the environmental and development review and approval process.	No Conflict. A Project-specific geotechnical investigation was completed for the Project and is the basis for the analysis of environmental impacts associated with geology and soils, as discussed in in Section 4.6, <i>Geology and Soils</i> , of this EIR. No conflict with this policy would occur.
Policy S-8.2. Ensure that the transport, use, storage, and disposal of hazardous materials occur in a responsible manner that protects public health and safety.	No Conflict. As discussed in Section 4.8, <i>Hazards, and Hazardous Materials</i> , of this EIR, the Project would be required to comply with applicable regulations regarding the use, storage, transport, and disposal of hazard materials. No conflict with this policy would occur.
Healthy Community Element	
Policy HC 1.3. Improve safety and the perception of safety by requiring adequate lighting, street visibility, and defensible space.	No Conflict. As discussed in Section 4.1, <i>Aesthetics</i> , of this EIR, the Project would include new sources of lighting on the currently vacant site, consistent with the PVCCSP lighting standards. New lighting would include signage and building and parking lot lighting for operations, security, and safety. The Project would have street visibility and would not conflict with this policy.
Policy HC 2.1. Implement the Perris Trail Master Plan.	No Conflict. The planned Ramona Expressway Regional trail is planned for the north side of Ramona Expressway running east and west. The trail would connect the County Regional Trail on the east to Metrolink on the west side of I-215, and extend to the Lake Perris Fairgrounds. The Project would not conflict with the planned Ramona Expressway Regional trail and would not conflict with this policy.

Applicable Elements, Goals, Policies, and Actions	Consistency Evaluation
Policy HC 2.3. Promote increased physical activity, reduced driving and increased walking, cycling and public transit by: • Requiring where appropriate the development of compact development patterns that are pedestrian and bicycle friendly Increasing opportunities for active transportation (walking and biking) and transit use. • Increasing opportunities for active transportation (walking and biking) and transit use. • Encouraging the development of neighborhood grocery stores that provide fresh produce.	No Conflict. The City's Active Transportation Plan includes a recommended Buffered Bike Lane (Class IIB) along Perris Boulevard, adjacent to the west of the Project site, and a recommended Separated Bikeway (Class IV) along Ramona Expressway, adjacent to the south of the Project site. The Project would not preclude the future development of the ATP recommended bikeways or development of the planned Ramona Expressway Trail. The Project includes the provision of bicycle racks, as required by PVCCSP EIR mitigation measure MM Trans 5. There are several transit stops along Perris Boulevard, including two within 150 feet of the Project site, which would provide access to the Project via public transit. The Project would not conflict with this policy.
Policy HC 2.4. Promote development patterns and policies that: • Reduce commute times. • Encourage the improvement of vacant properties and the reinvestment in neighborhoods. • Provide public space for people to congregate and interact socially. • Foster safe and attractive environments.	No Conflict. The Project would develop a vacant property within the PVCCSP area. The Project would generate employment associated with the proposed industrial and retail uses. The proposed uses would be developed in compliance with the design guidelines and development standards outlined in the PVCCSP, including the provision of required indoor and outdoor employee amenities, which would provide space for future employees and customers to interact. The Project would be development consistent with PVCCSP design guidelines, which would provide a safe and attractive Project. The Project would not conflict with this policy.
Policy HC 2.6 Encourage land use and urban design to promote physical activity, provide access to nutritious foods, and reduce air pollution.	No Conflict. Refer to the consistency analysis for Policy HC 2.2, Policy HC 2.3, and Policy HC 2.4, above, which address the Project's consistency with policies that promote physical activities. Also, refer to the consistency analysis for Connect SoCal Goal 5, which addresses air quality. The Project would result in significant and unavoidable impacts to air quality and greenhouse gas emissions. However, all feasible and applicable mitigation measures were considered to reduce air quality and greenhouse gas emissions to the maximum feasible extent.
Policy HC 3.1. Coordinate with transportation service providers and transportation planning entities to improve access to multi-modal transportation options throughout Perris including public transit.	No Conflict. There are existing RTA Routes 19 and 27 run along Ramona Expressway and Perris Boulevard. Consistent with PVCCSP EIR mitigation measure MM Trans 4, the Project Applicant has coordinated with the RTA with respect to the bus routes and bus stops. The Project is consistent with this policy.
Policy HC 3.5. Promote job growth within Perris to reduce the substantial out-of-Perris job commutes that exist today.	No Conflict. The Project would generate temporary construction jobs and permanent employment associated with the proposed retail and industrial uses. The Project would not conflict with this policy.

Applicable Elements, Goals, Policies, and Actions	Consistency Evaluation
Policy HC 4.1. Promote public spaces that foster positive human interaction and healthy lifestyles.	No Conflict. Refer to the consistency analysis for Policy HC 2.4, above, which addresses spaces for interaction. No conflict with this policy would occur as a result of the Project.
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.	No Conflict. As previously identified, an objective of the PVCCSP is to promote sustainable development. Also, refer to the consistency analysis for Connect SoCal Goal 8, which addresses new technology. The Project would not conflict with this policy.
Policy HC 6.2. Support regional water quality efforts that balance water conservation, use of recycled water, and best practices in watershed management.	No Conflict. As discussed in Section 4.9, <i>Hydrology and Water Quality</i> , of this EIR, the Project would comply with applicable regulations to protect water quality during construction and operation. As discussed in Sections 4.7, <i>Greenhouse Gas Emissions</i> , and 4.14, <i>Utilities and Service Systems</i> , of this EIR, the Project incorporates PVCCSP requirements related to water and resource conservation, which have been incorporated into Project design. These requirements include the use of water efficient devices and landscaping. The Project would not conflict with this policy.
Policy 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 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.	No Conflict. As discussed in Section 4.2, <i>Air Quality</i> , of this EIR, the Project would comply with applicable SCAQMD rules in place to protect air quality in the region during construction activities. The Project incorporates PVCCSP EIR mitigation measures to reduce Project-related construction emissions, and additional Project-specific mitigation measures to further reduce Project construction emissions. With implementation of PVCCSP EIR mitigation measures and Project-specific mitigation, construction emissions would not exceed applicable SCAQMD thresholds of significance for daily air pollutant emissions and construction air quality impacts would be less than significant.

Applicable Elements, Goals, Policies, and Actions	Consistency Evaluation
Environmental Justice Element	
Continue to ensure new development is compatible with the surrounding uses by co-locating compatible uses and using physical barriers, geographic features, roadways, or other infrastructure to separate less compatible uses. When this is not possible, impacts may be mitigated using: noise barriers, building insulation, sound buffers, traffic diversion.	No Conflict. The land uses surrounding the Project site are within the PVCCSP area and include undeveloped vacant land to the west, east, and south; commercial uses to the west and south; industrial and warehouse development to the north and east; and a gas station and commercial uses immediately adjacent to the southwest. Although the Project proposes a zoning change from Commercial to Light Industrial for a portion of the Project site, the overall proposed uses for the Project (commercial and warehouse uses) are consistent with development and infrastructure improvements anticipated by the PVCCSP and similar to existing and planned surrounding uses. The Project would not be incompatible with surrounding land uses, as demonstrated through the environmental analysis contained in this EIR, including Section 4.2, <i>Air Quality</i>; Section 4.11, <i>Noise</i>; and Section 4.12, <i>Transportation</i>.
As part of the development review process, require conditions that promote Good Neighbor Policies for Industrial Development for industrial buildings larger than 100,000 square feet. The conditions shall be aimed at protecting nearby homes, churches, parks, day-care centers, schools, and nursing homes from air pollution, noise lighting, and traffic associated with large warehouses, making them a “good neighbor.”	No Conflict. The Project would not be incompatible with surrounding land uses, as demonstrated through the environmental analysis contained in this EIR, including Section 4.2, <i>Air Quality</i>; Section 4.11, <i>Noise</i>; and Section 4.12, <i>Transportation</i>. The Project site is located within a portion of the City designated for commercial and industrial uses, including warehouses. The PVCCSP contains limited residential areas, which are associated with residences that were existing in the area at the time of PVCCSP development. The Project site is not located adjacent to or near existing schools, churches, day-care centers, or nursing homes, and none of these uses existing along the Project’s proposed truck route. While a park is located approximately 0.5 mile southeast of the Project site, it is not located along the Project’s truck routes.
Inform existing industries of the state 5-minute maximum idling limitation and condition new industrial projects to enforce the state’s 5-minute maximum idling limitation for stationary diesel trucks.	No Conflict. As further discusses in Section 4.2, <i>Air Quality</i>, of this EIR, the Project would implement PVCCSP EIR mitigation measure MM Air 11, which requires signage be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of 5 minutes.
Require developers to provide pedestrian and bike friendly infrastructure in alignment with the vision set in the City’s Active Transportation Plan or active transportation in-lieu fee to fund active mobility projects.	No Conflict. Refer to the consistency analysis for policies HC 2.1 and HC 2.3, which addresses active transportation. Additionally, as further discussed in this EIR section, the Project is consistent with the City’s Active Transportation Plan. The Project would include the provision of bicycle storage and bicycle facilities as required by the City, the PVCCSP EIR, and the CALGreen Code.

Consistency with City of Perris Good Neighbor Guidelines

- The proposed project would be designed and required to obtain Silver LEED Certification
- The project would not be required to install solar panels as it is restricted due to the March Air Base Accident Potential Zone
- Consistency with applicable GNG 2022 will be required through Project Conditions of Approval.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

A less than significant impact would occur.

4.10.5 Cumulative Impacts

As identified in Section 5.0, Other CEQA Topics, of the PVCCSP EIR, this cumulative impact analysis considers development of the Project in relation to the City's General Plan land use policies and zoning ordinances, along with other developmental policies. The PVCCSP EIR concludes that cumulative impacts associated with the development of allowed uses under the PVCCSP, which would include the Project, would be consistent with all applicable General Plan Policies and regional plans, and cumulative impacts would be less than significant.

As discussed above, the Project would not physically divide an established community, and as such, would not contribute to a cumulative impact with regards to the physical division of a community.

Development of the Project would require an amendment to the PVCCSP to change existing zoning for a portion of the site from Commercial to Light industrial. Light Industrial land uses are allowed in the PVCCSP and areas immediately to the north and east of the Project site are designated for Light Industrial uses. As presented in the analysis above, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating and environmental effect.

The proposed uses are consistent with the existing and planned land uses in the area, and are consistent with the overall types of land uses that are proposed and existing for the PVCCSP area. Cumulative development projects would be reviewed for consistency with adopted land use plans and policies of the City of Perris (including General Plan policies and zoning requirements), in accordance with the requirements of CEQA, the state Zoning and Planning Law, and the State Subdivision Map Act, all of which require findings of plan and policy consistency prior to approval of entitlements for development. Therefore, it can be assumed that through these requirements, future development would be consistent with adopted goals and policies and compatible with existing land uses. However, even if the cumulative impact of these projects would be significant, the Project's contribution to such cumulative land use impacts is less than significant and is thus not cumulatively considerable because (1) the proposed development would not change the type or amount of development anticipated by the City's General Plan and PVCCSP; (2) the Project does not conflict with adopted goals and policies as identified through the analysis presented in this section.

4.10.6 References

City of Perris. 2022a. Perris Municipal Code Supplement Codified through Ordinance No. 1413, adopted January 11, 2022.

2022b. Perris General Plan Environmental Justice Element. Approved on January 25, 2022.

2022c. City of Perris Good City Guidelines. Available at:
<https://www.cityofperris.org/home/showpublisheddocument/15478/637999606610400000> .

2021. General Plan Safety Element. Revised 2021. Available at:
<https://www.cityofperris.org/home/showpublisheddocument/15024/637807110903270000> .

2013. General Plan Land Use Map. Updated on January 3, 2013.

2005. Perris Comprehensive General Plan 2030. Approved April 26, 2005. Available at
<https://www.cityofperris.org/departments/development-services/general-plan>

Office of Planning and Research (OPR). State of California General Plan Guidelines. July 31, 2017.

Riverside County Airport Land Use Commission. 2014. March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Adopted November 13, 2014.

Southern California Association of Governments (SCAG). 2020. Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. September 3.

2018. Industrial Warehousing in the SCAG Region. April.

4.11 NOISE

This section of the EIR evaluates potential noise impacts resulting from implementation of the proposed Project. This analysis is based on the Noise and Vibration Analysis (Urban Crossroads 2022) prepared for the Project, which is included as Appendix R of this EIR. The land uses evaluated within the Noise and Vibration analysis rely on a previous Project description that would generate more trips, and consequently more noise compared to the proposed Project. Therefore, the analysis provided presents a conservative analysis of anticipated impacts.

There were no comments received on the 2022 or 2023 NOPs or at the July 20, 2022 Draft EIR public scoping meeting regarding noise.

4.11.1 Existing Setting

4.11.1.1 Noise Fundamentals

The PVCCSP EIR defines noise as unwanted or objectionable sound. The effect of noise on people can include general annoyance, interference with speech communication, sleep disturbance and, in the extreme, hearing impairment. The unit of measurement used to describe a noise level is the decibel (dB). However, since the human ear is not equally sensitive to all frequencies within the sound spectrum, the “A-weighted” noise scale, which weights the frequencies to which humans are sensitive, is used for measurements. Noise levels using A-weighted measurements are written dBA or dBA. Decibels are measured on a logarithmic scale which quantifies sound intensity in a manner that is similar to the Richter scale used for earthquake magnitudes. In the case of noise, a doubling of the energy from a noise source, such as the doubling of a traffic volume, would increase the noise level by 3 dBA; a halving of the energy would result in a 3 dBA decrease.

The PVCCSP EIR further states that average noise levels over a period of minutes or hours are usually expressed as dB L_{EQ} or the equivalent noise level for that period of time. For example, $L_{EQ}^{(3)}$ would represent a three-hour average. When no time-period is specified, a one-hour average is assumed. Noise standards for land use compatibility are stated in terms of the Community Noise Equivalent Level (CNEL) and the Day-Night Average Noise Level (Ldn). CNEL is a 24-hour weighted average measure of community noise. The computation of CNEL adds 5 dBA to the average hourly noise levels between 7:00 p.m. and 10:00 p.m. (evening hours), and 10 dBA to the average hourly noise levels between 10:00 p.m. to 7:00 a.m. (nighttime hours). This weighting accounts for the increased human sensitivity to noise in the evening and nighttime hours. Ldn is a very similar 24-hour weighted average which weighs only the nighttime hours and not the evening hours. CNEL is normally about 1 dB higher than L_{DN} for typical traffic and other community noise levels.

Operational and construction activities can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Construction vibration is generally associated with pile driving and rock blasting. Other construction equipment such as air compressors, light trucks, hydraulic loaders, etc., generates little or no ground vibration. Large bulldozers and loaded trucks can cause perceptible vibration levels proximate receptors. According to the PVCCSP EIR, a major concern regarding construction vibration is building damage. Consequently, construction vibration is generally assessed in terms of peak particle velocity (PPV). The United States Department of Transportation Federal Transit Administration (FTA) provides guidelines for

maximum-acceptable vibration criteria for different types of land uses. According to the FTA, buildings can be exposed to ground-borne vibration levels of 0.5 PPV without experiencing structural damage.

4.11.1.2 Existing Noise Measurements

To assess the existing noise level environment, 24-hour noise level measurements were taken at five locations in the Project vicinity. The receiver locations were selected to describe and document the existing noise environment within the Project area. **Figure 4.11-1, Noise Measurement Locations**, provides the boundaries of the Project site and the noise level measurement locations. To fully describe the existing noise conditions, noise level measurements were collected by Urban Crossroads, Inc. on Wednesday July 21st, 2021. The noise measurements presented below focus on the equivalent or the energy average hourly sound levels (L_{EQ}). The equivalent sound level represents a steady state sound level containing the same total energy as a time varying signal over a given sample period.

Table 4.11-1, *24-Hour Existing 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 each noise level measurement location and provides the energy average noise levels used to describe the daytime and nighttime ambient conditions. These daytime and nighttime energy average noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number.

Table 4.11-1
24-HOUR EXISTING AMBIENT NOISE LEVEL MEASUREMENTS

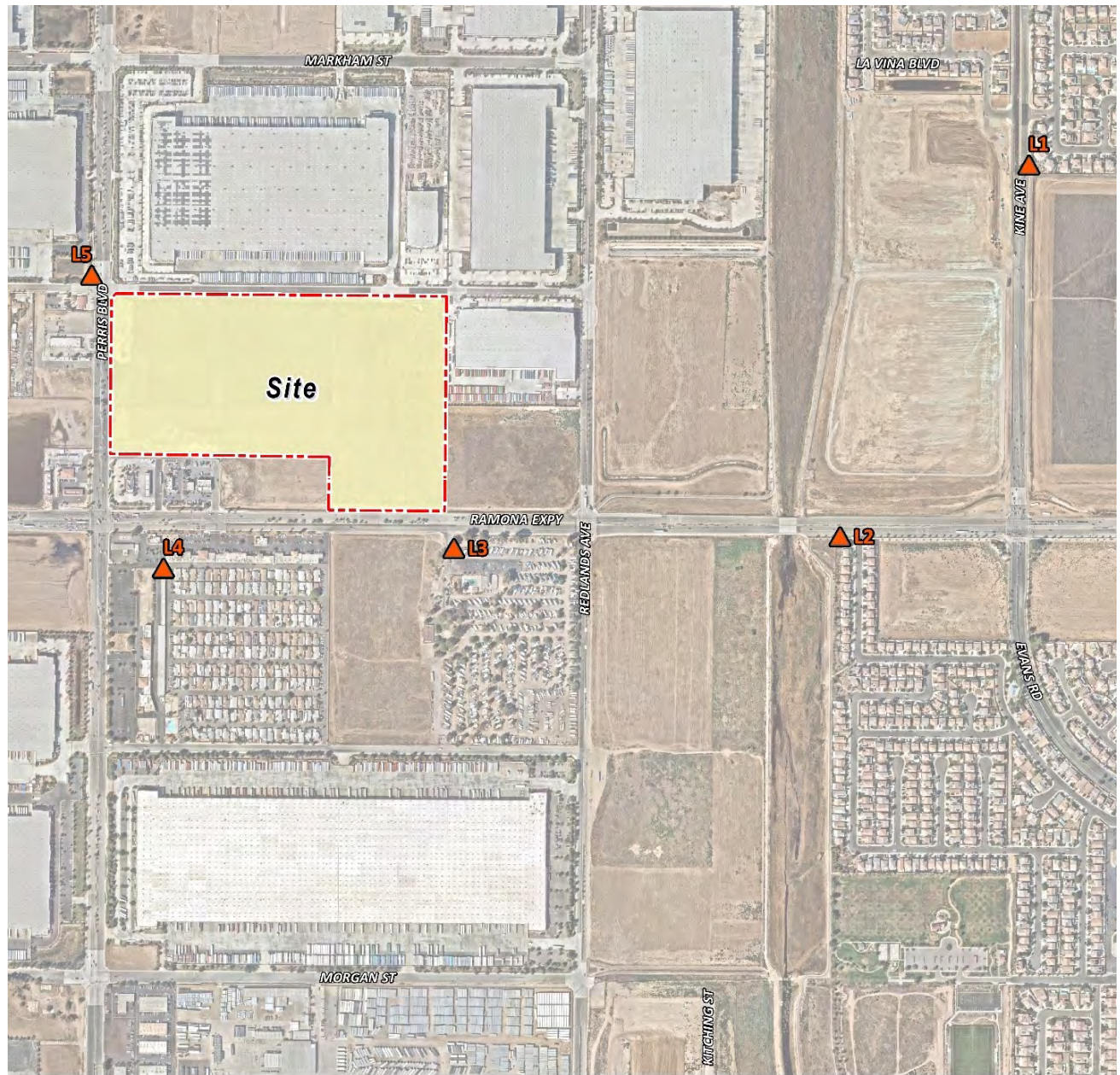
Location ¹	Description	Energy Average Noise Level (dBA L_{EQ}) ²	
		Daytime	Nighttime
L1	Located northeast of the Project site near the property line of the single-family residence at 807 Amaya Drive.	71.2	67.8
L2	Located southeast of the Project site near the property line of the single-family residence at 3896 Akina Avenue.	69.9	68.3
L3	Located south of the Project site near the property line of Camper Resorts of America Clubhouse at 375 Ramona Expressway.	62.6	60.3
L4	Located south of the Project site near the property line of Park Place Mobile Home Park at 80 East Dawes Street.	63.3	59.7
L5	Located west of the Project site near the property line of Katana Motors at 4194 North Perris Boulevard.	73.4	72.3

Source: Urban Crossroads 2022

¹ See Figure 4.11-1 for the noise level measurement locations.

² Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix 5.2 of the Project Noise and Vibration Analysis (Appendix R of this EIR).

Daytime = 7:01 a.m. - 10:00 p.m.; Nighttime = 10:01 p.m. - 7:00 a.m.



Source: Urban Crossroads 2022

As shown in Table 4.11-1, average daytime noise levels in the Project vicinity range from 62.6 dBA L_{EQ} to 73.4 dBA L_{EQ} . The background ambient noise levels in the Project vicinity are dominated by the transportation-related noise associated with the arterial roadway network (i.e., Ramona Expressway, North Perris Boulevard, Redlands Avenue, and other local streets). This includes auto and heavy truck activities near the noise level measurement locations. Additional background noise sources in the Project vicinity include aircraft overflight from March Air Reserve Base/Inland Port Airport (MARB/IPA). The Project site is located approximately 1.5 miles southeast of MARB/IPA. The Project site is located outside of the 60 dBA CNEL noise level contour boundaries of MARB/IPA (Air Force Reserve Command 2018).

Estimated existing traffic noise levels on roads that would be used by Project-generated traffic are shown in Table 4.11-2, *Existing Without Project Traffic Noise Contours*. As shown in Table 4.11-2, existing traffic noise at receiving land uses in the Project vicinity range from 58.9 dBA CNEL for the Ramona Expressway road segment west of North Perris Boulevard, up to 77 dBA CNEL for the Ramona Expressway road segment east of Redlands Avenue.

**Table 4.11-2
EXISTING WITHOUT PROJECT TRAFFIC NOISE CONTOURS**

ID	Road	Segment	Receiving Land Use ¹	CNEL at Receiving Land Use (dBA) ²	Distance to Contour from Centerline (feet)		
					70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
1	Perris Boulevard	south of Harley Knox Boulevard	Non-Sensitive	75.1	56	122	262
2	Perris Boulevard	north of Ramona Expressway	Non-Sensitive	74.9	RW	111	240
3	Perris Boulevard	south of Ramona Expressway	Sensitive	74.9	RW	75	161
4	Perris Boulevard	south of Rider Street	Sensitive	74.6	75	162	350
5	Redlands Avenue	south of Harley Knox Boulevard	Non-Sensitive	70.8	75	161	347
6	Redlands Avenue	south of Markham Street	Non-Sensitive	71.3	170	367	790
7	Redlands Avenue	north of Ramona Expressway	Non-Sensitive	71.3	166	358	770
8	Harley Knox Boulevard	west of Perris Boulevard	Non-Sensitive	71.5	166	358	771
9	Harley Knox Boulevard	east of Perris Boulevard	Sensitive	69.7	314	677	1459
10	Perry Street	west of Redlands Avenue	Non-Sensitive	57.7	269	579	1248
11	Ramona Expressway	west of Indian Avenue	Non-Sensitive	76.4	262	564	1215
12	Ramona Expressway	west of Perris Boulevard	Non-Sensitive	58.9	247	533	1147
13	Ramona Expressway	east of Redlands Avenue	Sensitive	77.0	RW	57	122
14	Ramona Expressway	east of Evans Road	Sensitive	75.4	45	96	207

Source: Urban Crossroads 2022

¹ Based on a review of existing aerial imagery.

² The CNEL is calculated at the boundary of the right-of-way of the receiving adjacent land use.

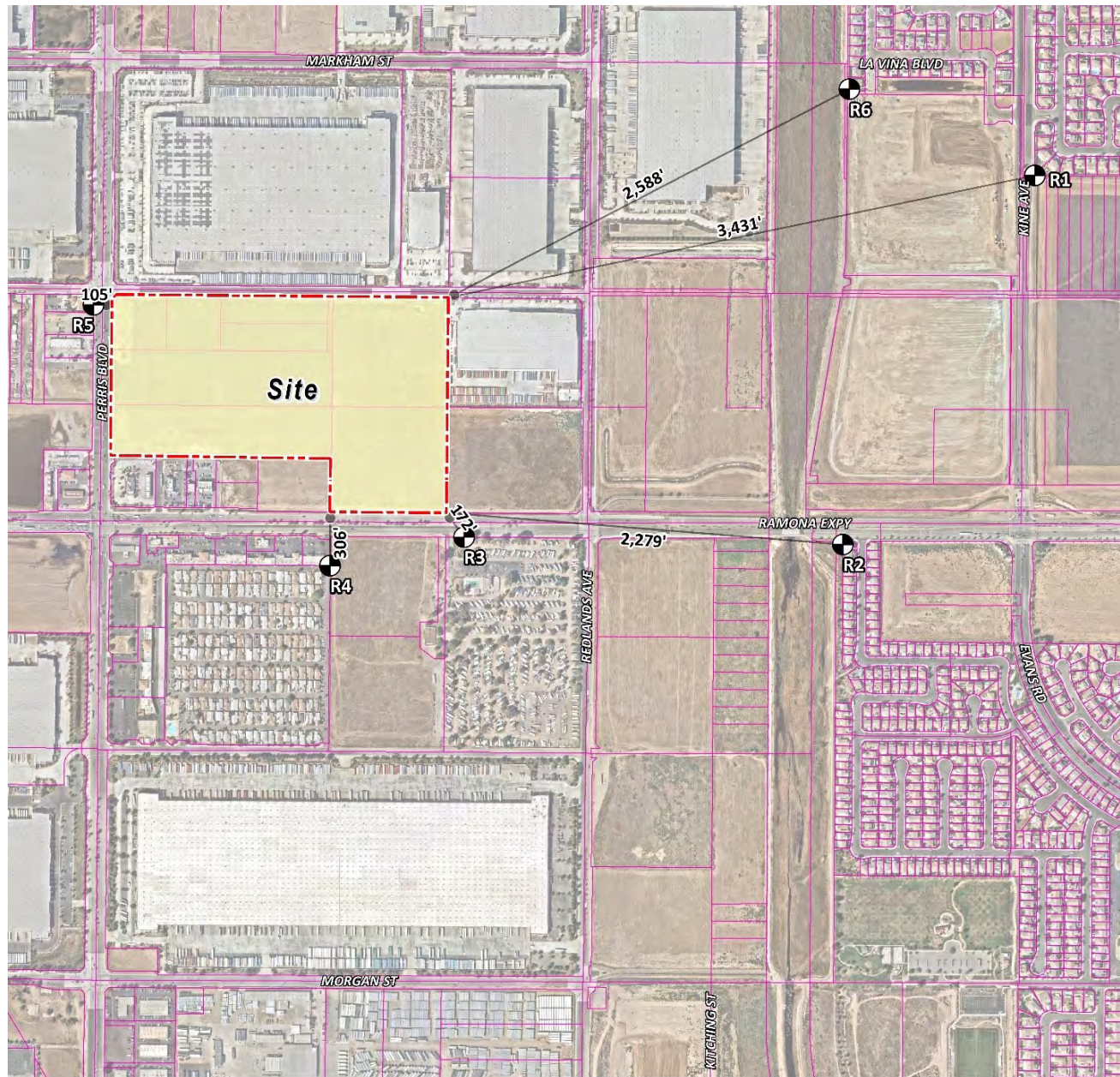
RW = Location of the respective noise contour falls within the right-of-way of the road.

4.11.1.3 Sensitive Receiver Locations

As identified in the PVCCSP 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.

To describe the potential off-site Project noise levels, six receiver locations in the vicinity of the Project site were identified (**Figure 4.11-2, Sensitive Receiver Locations**). Other sensitive land uses in the Project vicinity that are located at greater distances than those identified in this analysis would experience lower noise levels than those presented due to the additional attenuation from distance and the shielding provided by intervening structures. Distance is measured in a straight line from the Project site boundary to the property line of each receiver location. As shown on **Figure 4.11-2**, the following locations were analyzed as sensitive receivers for Project noise impacts:

- R1: Location R1 represents the property line of the existing residence at 4310 Almaterra Drive, approximately 3,431 feet northeast 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 residence at 3896 Akina Avenue, approximately 2,279 feet southeast 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 Camper Resorts of America at 375 Ramona Expressway, approximately 172 feet southeast 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 Park Place Mobile Home Park at 80 East Dawes Street, approximately 306 feet south of the Project site. A 24-hour noise measurement was taken near this location, L4, to describe the existing ambient noise environment.
- R5: Location R5 represents the property line of the Katana Motors at 4194 N. Perris Boulevard, approximately 105 feet west of the Project site. A 24-hour noise measurement was taken near this location, L5, to describe the existing ambient noise environment.
- R6: Location R6 represents the property line of the existing residence at Albatross Avenue, approximately 2,588 feet northeast of the Project site. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.



LEGEND:

N
 Site Boundary
 Parcel Boundary
 Receiver Locations
 Distance from receiver to Project site boundary (in feet)

Source: Urban Crossroads 2022

4.11.2 Existing Policies and Regulations

4.11.2.1 State

State of California Noise 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; OPR 2019). The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. In addition, the CEQA requires that all known environmental effects of a project be analyzed, including environmental noise impacts.

State of California Green Building Standard Code

The State of California's Green Building Standards Code (CALGreen) contains mandatory measures for non-residential building construction in Section 5.507 on Environmental Comfort (California Department of General Services 2022). 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 noise levels exceed 65 dBA CNEL, such as within a noise contour of an airport, freeway, railroad, and other 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 level of 50 dBA L_{EQ} in occupied areas during any hour of operation (Section 5.507.4.2). As outlined below in Section 4.11.2.2, the Project is not located within the 65 dBA CNEL noise contour of MARB/IPA.

4.11.2.2 Local

March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan

The MARB/IPA ALUCP includes the policies for determining the land use compatibility of the Project. The MARB/IPA ALUCP indicates that the Project site is located within the Flight Corridor Buffer (Compatibility Zone D) and is considered to have a moderate to low noise impact and is mostly within or near the 55 dBA CNEL noise level contour boundaries. Consistent with the Basin Compatibility Criteria, only uses that attract very high concentrations of people in confined areas are discouraged. The MARB/IPA ALUCP does not identify industrial-use specific noise compatibility standards and, therefore, the Governor's OPR Land Use Compatibility for Community Noise Exposure, is used to assess potential aircraft-related noise levels 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 and *conditionally acceptable* with exterior noise levels between 70 to 80 dBA CNEL. The noise contour boundaries used to determine the potential aircraft-related noise impacts at the Project site are found on Figure 6-9 of the March Air Reserve Base 2018 Final Air Installations Compatible Uses Zones Study. Based on the 2018 noise level contours for MARB/IPA, the Project development area is located outside the 60 dBA CNEL noise level contour boundaries and is considered *normally acceptable*.

City of Perris General Plan Noise Element

The City of Perris has adopted a Noise Element of the General Plan (City of Perris 2016) 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 noise policies and implementation measures designed to protect, create, and maintain an environment free from noise that may jeopardize the health or welfare of sensitive receptors, or degrade quality of life.

The noise standards identified in the City of Perris General Plan are guidelines to evaluate the acceptability of transportation related noise level impacts. These standards are based on the Governor's 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 (Exhibit N-1 of the Noise Element), 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. Commercial uses are *normally acceptable* with exterior noise levels below 65 dBA CNEL and *conditionally acceptable* with noise levels below 75 dBA CNEL and *normally unacceptable* with exterior noise level above 75 dBA CNEL. Industrial uses are considered *normally acceptable* with exterior noise levels of up to 70 dBA CNEL, and *conditionally acceptable* with exterior noise levels between 70 to 80 dBA CNEL (City of Perris 2005).

City of Perris Municipal Code

The City of Perris Municipal Code, Chapter 7.34 *Noise Control*, Section 7.34.060, identifies the City's construction noise standards and permitted hours of construction activity (refer to Table 4.11-3, *City of Perris Municipal Code Construction Noise Standards*). The City of Perris Municipal Code, Section 7.34.060, noise level standard of 80 dBA L_{MAX} (the maximum level measured over the time interval) applies to residential zones within the City of Perris (City of Perris 2022a).

Table 4.11-3
CITY OF PERRIS MUNICIPAL CODE CONSTRUCTION NOISE STANDARDS

Jurisdiction	Permitted Hours of Construction Activity	Construction Noise Level Standard
City of Perris ¹	7:00 a.m. to 7:00 p.m. on any day except Sundays and legal holidays (except for Columbus Day and Washington's birthday).	80 dBA L_{MAX}

¹ City of Perris Municipal Code, Section 7.34.060; City of Perris 2022a.

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 4.11-3 (City of Perris 2022a). Additional exterior noise level standards are identified in the City of Perris General Plan Noise Element Implementation Measure V.A.1, which requires that new industrial facilities and large-scale commercial 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 4.11-4, *City of Perris Municipal Code Operational Noise Standards*, shows the Municipal Code and General Plan standards used in this analysis to evaluate the potential operational noise impacts from the Project.

**Table 4.11-4
CITY OF PERRIS MUNICIPAL CODE OPERATIONAL NOISE STANDARDS**

Jurisdiction	Land Use	Time Period	Noise Level Standard (dBA)
City of Perris	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 the property line ²	24 Hours	60 dBA CNEL

¹ City of Perris Municipal Code, Sections 7.34.040 & 7.34.050.

² City of Perris General Plan Noise Element, Implementation Measure V.A.1.

4.11.2.3 Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to noise. These Standards and Guidelines summarized below are incorporated as part of the Project and are assumed in the analysis presented in this section. The Project is required to comply with these Standards and Guidelines. The chapters/section numbers provided correspond to the PVCCSP chapters/sections.

Airport Overlay Zone (Chapter 12.0 of PVCCSP)

12.1.3 Compatibility with March ARB/IP ALUCP.

The PVCCSP is in MARB/IPA safety zones and therefore all development shall comply with the following measures:

- **Noise Standard:** All building office areas shall be constructed with appropriate sound mitigation measures as determined by an acoustical engineer or architect to ensure appropriate interior sound levels.
- **Notice of Airport in the Vicinity:** Prior to approval of new development projects, all applicants shall prepare an aerial photograph identifying the location of the MARB/IPA in relationship to the project site, and a Notice of Airport in the Vicinity. Because the entire PVCCSP lies within the MARB Airport Influence Area (AIA), notice must be provided to all potential purchasers or tenants (refer to mitigation measure PVCCSP MM Haz 4 in Section 4.8, *Hazards, and Hazardous Materials*, of this EIR).

The following mitigation measures from the PVCCSP EIR for noise impacts are incorporated as part of the Project and are assumed in the analysis presented in this subsection.

- MM Noise 1** During all project site excavation and grading on-site, the construction contractors shall equip all construction equipment, fixed or mobile, shall be equipped with [sic] properly operating and maintained mufflers consistent with manufacturer's 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.

- MM Noise 2** During construction, stationary construction equipment, stockpiling and vehicle staging areas will be placed a minimum of 446 feet away from the closest sensitive receptor.
- 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.
- 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.

4.11.3 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a significant noise impact would occur if implementation of the Project would:

- a) Result in the 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 the generation of excessive groundborne vibration or groundborne noise levels; and/or
- c) Expose people residing or working in the Project area to excessive noise levels by being 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.

While the City of Perris General Plan Noise Element provides direction on noise compatibility and establishes noise standards by land use type that are sufficient to assess the significance of noise impacts, it does not define the levels at which increases are considered substantial for use under CEQA threshold (a).

Noise level increases at nearest receiver locations resulting from the Project are evaluated based on the PVCCSP EIR Thresholds described below at the nearest sensitive receiver locations (Table 4.11-5, *Significance Criteria Summary*). Further, CEQA requires that consideration be given to the magnitude of the increase, the existing ambient noise levels, and the location of noise-sensitive receivers to determine if a noise increase represents a significant adverse environmental impact. This approach recognizes *that there is no single noise increase that renders the noise impact significant* (California Court of Appeal 2008).

According to the PVCCSP EIR, there is no official “industry standard” of determining significance of noise impacts. However, typically, a jurisdiction would 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 without Project noise levels is considered a significant impact at all other

sensitive land uses (City of Perris 2022b). The City of Perris does not consider noise increases to non-noise-sensitive uses to be significant; thus, even if noise level increases exceed 3 dBA or 5 dBA, if the increases occur at non-sensitive uses, the noise increase would not result in a significant impact.

Noise impacts shall be considered significant if any of the conditions shown in Table 4.11-5 occur as a direct result of the proposed Project.

**Table 4.11-5
SIGNIFICANCE CRITERIA SUMMARY**

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site	Noise	If resulting noise level is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase	
Traffic	Sensitive ¹	If resulting noise level is > 60 dBA CNEL	≥ 3 dBA CNEL Project increase	
Operational	Noise-	At residential land use ²	80 dBA L _{MAX}	60 dBA L _{MAX}
	Sensitive ³	Within 160 feet of noise-sensitive use ³	60 dBA CNEL (exterior)	
		If resulting noise level is < 60 dBA L _{EQ} ¹	≥ 5 dBA L _{EQ} Project increase	
		If resulting noise level is > 60 dBA L _{EQ} ¹	≥ 3 dBA L _{EQ} Project increase	
Construction	Noise-	At residential land use ⁴	80 dBA L _{MAX}	
	Sensitive	Vibration level threshold ⁵	0.5 PPV (in/sec)	

Source: Urban Crossroads 2022

¹ PVCCSP EIR, Page 4.9-20.

² City of Perris Municipal Code, Section 7.34.040.

³ City of Perris General Plan Noise Element, Implementation Measure V.A.1.

⁴ City of Perris Municipal Code, Section 7.34.060.

⁵ PVCCSP EIR, Page 4.9-27.

Daytime = 7:01 a.m. - 10:00 p.m.; Nighttime = 10:01 p.m. - 7:00 a.m.

4.11.4 Environmental Impacts

Threshold a: Would the project result in the 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?

Impact Analysis

Consistent with the analysis presented in the PVCCSP EIR, the Project has the potential to result in a substantial temporary or permanent increase in ambient noise levels during construction of the Project, during long-term site operations, and due to Project-related traffic. Each is discussed below.

Construction-Related Noise Impacts

The PVCCSP EIR concludes that construction-generated noise resulting from implementation of the PVCCSP and its subsequent implementing development and infrastructure projects could result in potentially significant impacts, but concluded that compliance with the day and hour limits of the Municipal Code (Noise Ordinance) and incorporation of PVCCSP EIR mitigation measures MM Noise 1 through MM Noise 4 would reduce impacts to less-than-significant levels. The PVCCSP EIR further concludes that the transport of workers and equipment to and from the Project site would incrementally increase noise on access roads leading to the site. Although there would be relatively high

intermittent noise from passing vehicles (i.e., to 86 L_{MAX} dBA at 50 feet), short-term, the PVCCSP EIR concludes intermittent noise from trucks would be minor when averaged over longer periods of time, and therefore, less than significant. Project construction would require the transport of workers and equipment to and from the Project site, in the same manner as identified in the PVCCSP EIR, resulting in similar construction noise impacts associated with worker and equipment transport as those identified in the PVCCSP EIR.

Noise generated by the Project construction equipment would 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 construction equipment are expected to operate during the following construction stages: site preparation, grading, building construction, paving, and architectural coating. **Figure 4.11-3, Typical Construction Noise Source Locations**, shows the construction noise source locations in relation to the nearest sensitive receiver locations previously described.

Noise levels generated by heavy construction equipment can range from approximately 68 dBA to more than 85 dBA L_{MAX} when measured at 50 feet. However, these noise levels diminish with distance from the construction site at a rate of 6 dBA per doubling of distance. For example, a noise level of 85 dBA L_{MAX} measured at 50 feet from the noise source to the receiver would be reduced to 79 dBA L_{MAX} at 100 feet from the source to the receiver and would be further reduced to 73 dBA L_{MAX} at 200 feet from the source to the receiver. Table 10-1 in the Project Noise and Vibration Analysis provides a summary of the construction reference noise levels expected with Project construction activities. Table 4.11-6, *Unmitigated Construction Equipment Noise Level Summary* contains a summary of unmitigated equipment noise levels at the nearest off-site noise receivers. As shown in Table 4.11-6, the construction noise levels are expected to range from 61.6 to 78.6 dBA L_{MAX} at the nearby receiver locations.

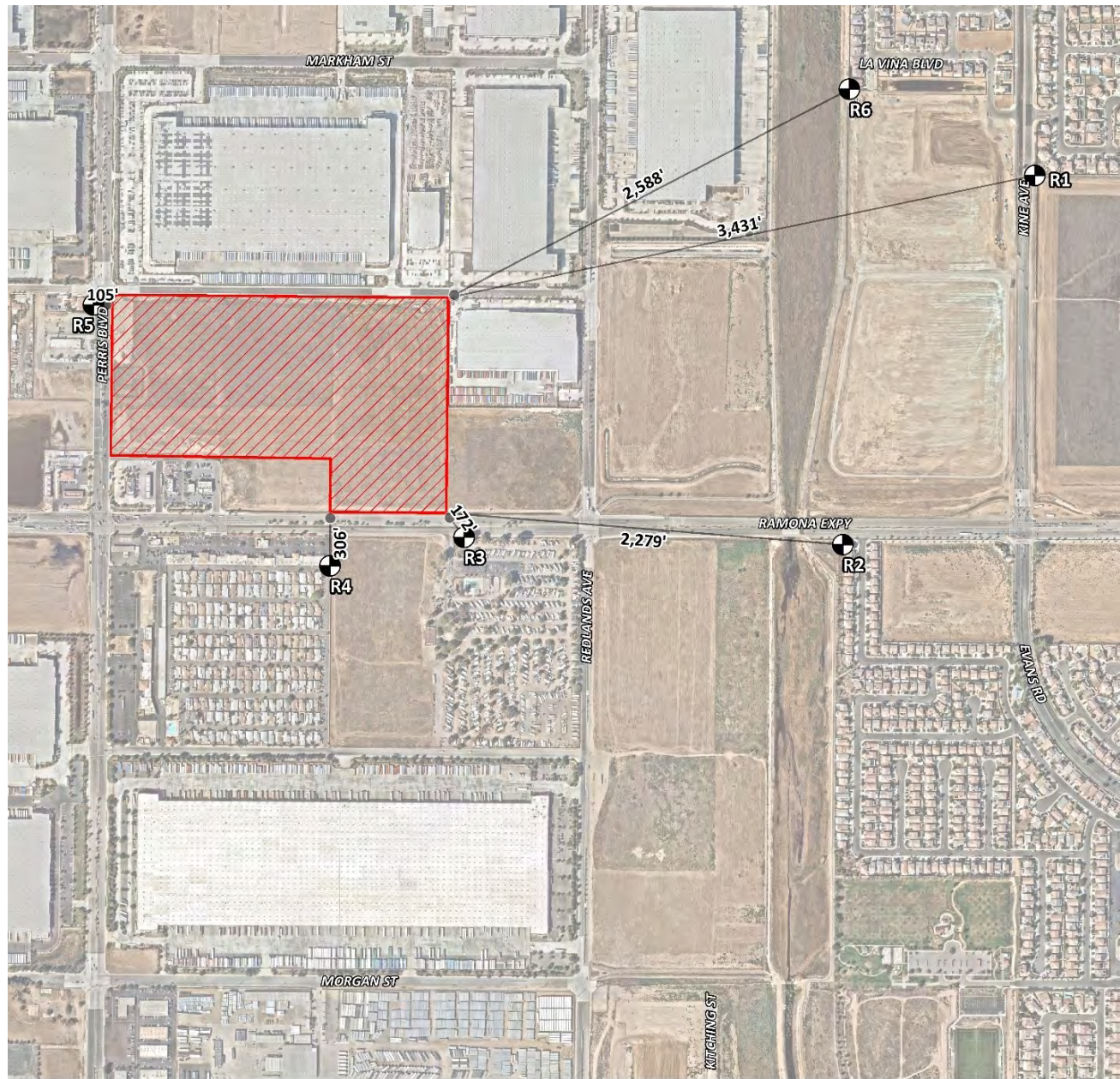
**Table 4.11-6
UNMITIGATED CONSTRUCTION EQUIPMENT NOISE LEVEL SUMMARY**

Receiver Location ¹	Highest Construction Noise Levels (dBA L _{MAX})					
	Site Preparation	Grading	Building Construction	Paving	Arch. Coating	Highest Levels ²
R1	58.6	61.6	61.6	61.6	61.6	61.6
R2	62.1	65.1	65.1	65.1	65.1	65.1
R3	73.2	76.2	76.2	76.2	76.2	76.2
R4	73.2	76.2	76.2	76.2	76.2	76.2
R5	73.0	76.0	76.0	76.0	76.0	76.0
R6	75.6	78.6	78.6	78.6	78.6	78.6

Source: Urban Crossroads 2022

¹ Noise receiver locations are shown on Figure 4.11-3.

² Construction noise level calculations based on distance from the construction activity area to nearby receiver locations. CadnaA construction noise model inputs are included in Appendix 10.1 of the Project Noise and Vibration Analysis (Appendix R of this EIR).



LEGEND:

-  Construction Activity
-  Receiver Locations
-  Distance from receiver to Project site boundary (in feet)

Source: Urban Crossroads 2022

To demonstrate compliance with local noise regulations, the Project-only construction noise levels are evaluated against exterior noise level thresholds established by Section 7.34.060 of City of Perris Municipal Code at the adjacent property line. As shown on Table 4.11-7, *Unmitigated Construction Equipment Noise Level Summary*, the estimated construction noise levels at the adjacent noise sensitive receiver locations would be below the 80 dBA L_{MAX} construction noise level standard. Therefore, the unmitigated noise impact due to Project construction activities is considered less than significant.

Table 4.11-7
UNMITIGATED CONSTRUCTION EQUIPMENT NOISE LEVEL SUMMARY

Receiver Location ¹	Construction Noise Levels (dBA L_{MAX})		
	Highest Construction Noise Levels ²	Threshold ³	Threshold Exceeded? ⁴
R1	61.6	80	No
R2	65.1	80	No
R3	76.2	80	No
R4	76.2	80	No
R5	76.0	80	No
R6	78.6	80	No

Source: Urban Crossroads 2022

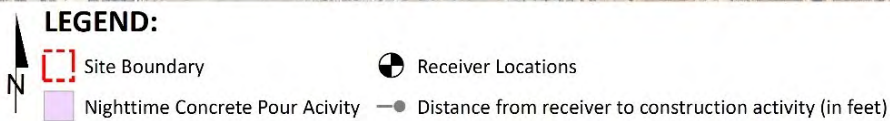
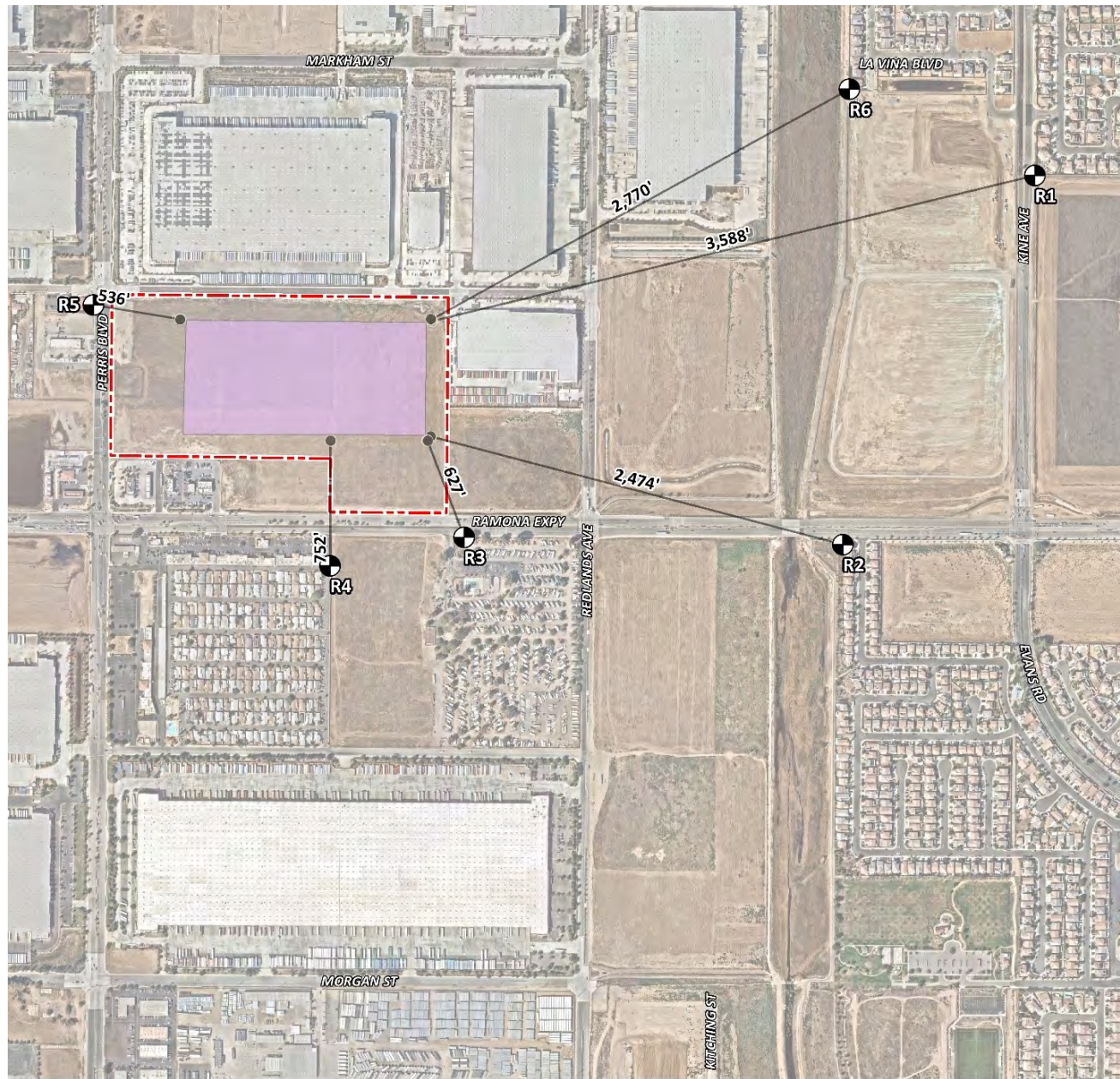
¹ Noise receiver locations are shown on Figure 4.11-3.

² Highest construction noise level calculations based on distance from the construction noise source activity to nearby receiver locations as shown on Table 4.11-6.

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?

Project construction could include nighttime concrete pouring activities. Nighttime concrete pouring activities are often used to support reduced concrete mixer truck transit times and lower air temperatures than during the daytime hours and are generally limited to the actual building area as shown on **Figure 4.11-4, Nighttime Concrete Pour Activities**. Since the nighttime concrete pours would take place outside the permitted City of Perris Municipal Code Section 7.34.060 hours of 7:00 a.m. to 7:00 p.m. on any day except Sundays and legal holidays (except for Columbus Day and Washington's birthday), the Project Applicant would be required to obtain authorization for nighttime work from the City of Perris.



Source: Urban Crossroads 2022

Table 4.11-8, *Nighttime Concrete Pour Noise Level Compliance*, shows the concrete pour activities noise levels would range from 55.3 to 68.6 dBA L_{MAX} at the nearby receiver locations. With prior authorization from the City of Perris, the nighttime concrete pour activities would be below the 80 dBA L_{MAX} construction noise level standard established for residential receivers. Therefore, the noise impacts associated with nighttime concrete pouring are considered less than significant at the nearby noise-sensitive receiver locations.

Table 4.11-8
NIGHT TIME CONCRETE POUR NOISE LEVEL COMPLIANCE

Receiver Location ¹	Construction Noise Levels (dBA L_{MAX})		
	Highest Construction Noise Levels ²	Threshold ³	Threshold Exceeded? ⁴
R1	55.3	80	No
R2	58.5	80	No
R3	67.7	80	No
R4	68.6	80	No
R5	68.4	80	No
R6	57.6	80	No

Source: Urban Crossroads 2022

¹ Noise receiver locations are shown on Figure 4.11-3.

² Highest construction noise level calculations based on distance from the construction noise source activity to nearby receiver locations as shown on Figure 4.11-3.

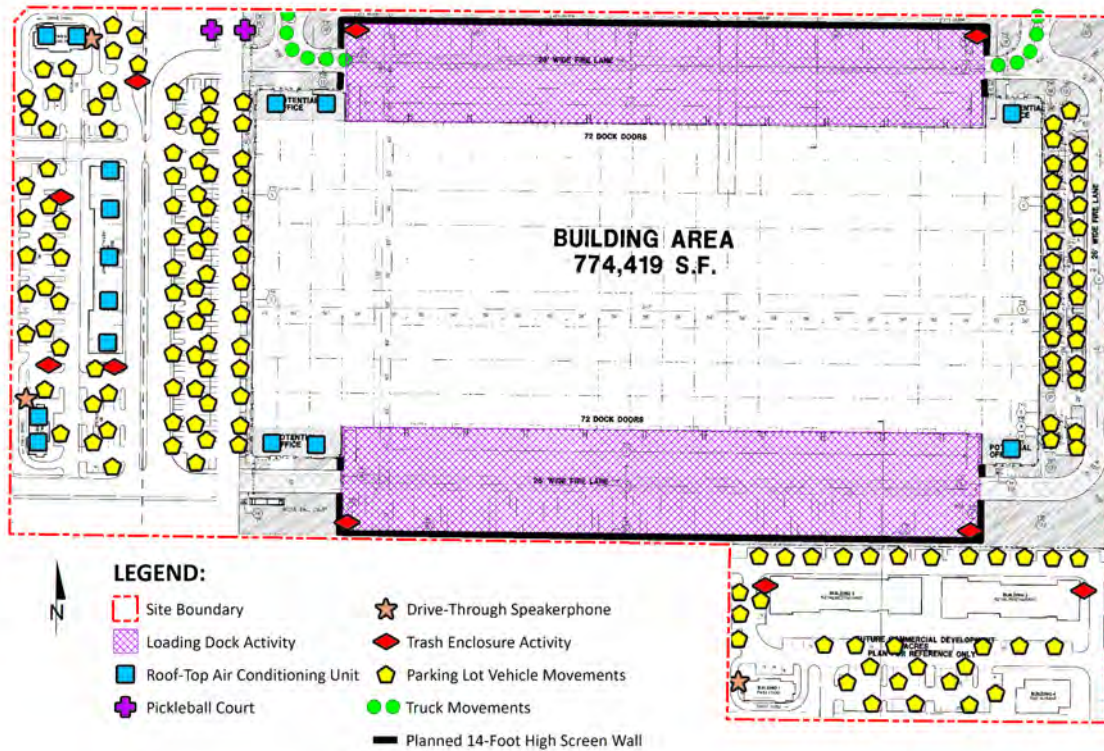
³ Construction noise level thresholds are limited to the noise sensitive receiver locations.

⁴ Do the estimated Project construction noise levels exceed the construction noise level threshold?

Operational-Related Noise Impacts

Project Operational Noise Levels

The operational noise analysis analyzes the potential stationary noise source operational noise impacts at the nearest off-site receive locations resulting from operation of the Project. To present the potential worst-case noise conditions, this analysis assumes the Project warehouse and retail land uses would be operational 24 hours per day, seven days per week. Consistent with similar warehouse and light industrial uses, the Project business operations would primarily be conducted within the enclosed buildings, except for traffic movement, parking, as well as loading and unloading of trucks at designated loading bays. The on-site Project-related noise sources are expected to include loading dock activity, truck movements, roof-top air conditioning units, drive-through speakerphone, trash enclosure activity, parking lot vehicle movements, and pickleball. **Figure 4.11-5, Operational Noise Source Locations**, identifies noise sources associated with Project operation. The operational noise analysis includes the planned 14-foot-high screen wall on the north and south perimeter of the loading dock areas for the proposed warehouse building. The screen wall locations shown on **Figure 4.11-5** are designed for screening, privacy, noise control, and security.



Source: Urban Crossroads 2022

To fully describe the exterior operational noise levels from the Project, a noise prediction model using the CadnaA (Computer Aided Noise Abatement) computer program was utilized. CadnaA can analyze multiple types of noise sources using the spatially accurate Project site plan, georeferenced Nearmap aerial imagery, topography, buildings, and barriers in its calculations to predict outdoor noise levels. Using the ISO 9613-2 protocol, CadnaA calculates the distance from each noise source to the noise receiver locations, using the ground absorption, distance, and barrier/building attenuation inputs to provide a summary of noise level at each receiver and the partial noise level contributions by noise source. The Project Noise and Vibration Analysis includes the detailed noise dBA L_{MAX} model inputs including the planned 14-foot-high screen wall used to estimate the Project operational noise levels.

To estimate the Project operational noise impacts, reference noise level measurements were collected from similar types of activities to represent the noise levels expected from the Project. The reference noise level measurements collected from existing similar operational noise sources are shown on Table 9-1 Noise and Vibration Analysis in Appendix R of this EIR.

Using the reference noise levels to represent the proposed Project operations that include loading dock activity, truck movements, roof top air condition units, drive-through speakerphone, trash enclosure activity, parking lot vehicle movements, and pickleball, operational source noise levels that are expected to be generated at the Project site were calculated and utilized to determine the Project-related noise level increases that would be experienced at each of the sensitive receiver locations. Table 4.11-9, *Daytime Project Operational Noise Levels*, shows the Project operational noise levels during the daytime hours of 7:01 a.m. to 10:00 p.m. The daytime hourly noise levels at the off-site receiver locations are expected to range from 42.6 to 58.7 dBA L_{MAX} .

Table 4.11-9
DAYTIME PROJECT OPERATIONAL NOISE LEVELS

Noise Source ¹	Operational Noise Levels by Receiver Location (dBA L_{MAX})					
	R1	R2	R3	R4	R5	R6
Loading Dock Activity	41.6	44.7	48.7	52.9	50.5	43.0
Truck Movements	20.1	22.5	24.7	10.0	29.1	22.9
Roof-Top Air Conditioning Units	20.7	22.5	30.1	33.2	44.5	22.5
Drive-Through Speakerphone	7.8	5.8	13.8	30.7	26.6	9.4
Trash Enclosure Activity	30.2	34.2	48.5	41.8	53.7	32.7
Parking Lot Vehicle Movements	33.1	37.4	49.0	48.2	55.6	35.3
Pickleball Court	27.2	24.7	16.5	19.0	37.7	29.5
Total (All Noise Sources)	42.6	45.8	53.5	54.5	58.7	44.2

Source: Urban Crossroads 2022

¹ See Figure 4.11-5 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 of the Project Noise and Vibration Analysis (Appendix R of this EIR).

Table 4.11-10, *Nighttime Project Operational Noise Levels*, shows the Project operational noise levels during the nighttime hours of 10:01 p.m. to 7:00 a.m. The nighttime hourly noise levels at the off-site receiver locations are expected to range from 42.0 to 55.7 dBA L_{MAX} . The differences between the daytime (shown in Table 4.11-9) and nighttime noise levels (shown in Table 4.11-10) are largely related to the duration of noise activity.

**Table 4.11-10
NIGHTTIME PROJECT OPERATIONAL NOISE LEVELS**

Noise Source ¹	Operational Noise Levels by Receiver Location (dBA L _{MAX})					
	R1	R2	R3	R4	R5	R6
Loading Dock Activity	41.6	44.7	48.7	52.9	50.5	43.0
Truck Movements	20.1	22.5	24.7	10.0	29.1	22.9
Roof-Top Air Conditioning Units	18.2	20.1	27.7	30.8	42.1	20.1
Drive-Through Speakerphone	3.8	1.8	9.8	26.8	22.7	5.4
Trash Enclosure Activity	26.3	30.2	44.5	37.8	49.7	28.7
Parking Lot Vehicle Movements	29.1	33.4	45.0	44.2	51.6	31.3
Pickleball Court	0.0	0.0	0.0	0.0	0.0	0.0
Total (All Noise Sources)	42.0	45.2	51.3	53.6	55.7	43.5

Source: Urban Crossroads 2022

¹ See Figure 4.11-5 for the noise source locations. CadnaA noise model calculations are included in Appendix 9.1 of the Project Noise and Vibration Analysis (Appendix R of this EIR).

To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against exterior noise level thresholds based on the City of Perris exterior noise level standards at nearby noise-sensitive receiver locations.

Consistent with the City of Perris General Plan Noise Element, Implementation Measure V.A.1, Project operational noise levels at the 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 City of Perris General Plan Noise Element requires new industrial facilities and large commercial facilities to demonstrate compliance at any noise-sensitive land use within 160 feet of the Project site.

Table 4.11-11, *Operational Noise Level Compliance (L_{MAX})*, shows the operational noise levels associated with Project would not exceed the City of Perris 80 dBA L_{MAX} daytime and 60 dBA L_{MAX} nighttime exterior noise level standards at nearby receiver locations. Therefore, the operational noise impacts are considered less than significant.

Table 4.11-11
OPERATIONAL NOISE LEVEL COMPLIANCE (L_{MAX})

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	42.6	42.0	80	60	No	No
R2	45.8	45.2	80	60	No	No
R3	53.5	51.3	80 ⁵	60 ⁵	No	No
R4	54.5	53.6	80	60	No	No
R5	58.7	55.7	80 ⁵	60 ⁵	No	No
R6	44.2	43.5	80	60	No	No

See Figure 4.11-2 for the receiver locations.

¹ Source: Urban Crossroads 2022

² Proposed Project operational noise levels as shown on Tables 4.11-9 and 4.11-10.

³ Exterior noise level standard are for residential land uses and are shown on Table 4.11-4.

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.

⁵ Exterior noise level standards listed in this table are the standards established in the City of Perris Municipal Code for residential uses. Receiver locations R3 and R5 are not residential uses; however, the application of the residential standard at R3 and R5 locations provides a conservative analysis of noise impacts at these locations.

The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time-of-day corrections require the addition of 5 decibels to dBA L_{EQ} sound levels in the evening from 7:00 p.m. to 10:00 p.m., and the addition of 10 decibels to dBA L_{EQ} sound levels at night between 10:00 p.m. and 7:00 a.m. These additions are made to account for the noise sensitive time periods during the evening and night hours when noise can become more intrusive, particularly for noise sensitive residential land use. CNEL does not represent the actual sound level heard at any time, but rather represents the total sound exposure. Table 4.11-12, *Operational Noise Level Compliance (CNEL)*, includes the evening and nighttime adjustments made to the operational noise levels during the applicable hours to convert the hourly operational noise levels (L_{EQ}) to 24-hour CNELs. Table 4.11-12 indicates that the 24-hour noise levels associated with the Project at the nearest receiver locations are expected to range from 41.0 to 56.8 dBA CNEL. The Project-related operational noise levels shown on Table 4.11-12 would be below the City of Perris 60 dBA CNEL exterior noise level standards at the nearest receiver locations.

**Table 4.11-12
OPERATIONAL NOISE LEVEL COMPLIANCE (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	35.2	34.3	41.0	60	No
R2	38.6	37.5	44.2	60	No
R3	47.0	44.3	51.1	60	No
R4	47.8	46.3	53.0	60	No
R5	53.2	49.9	56.8	60	No
R6	36.9	35.8	42.5	60	No

¹ See Figure 4.11-2 for the receiver locations.

² Proposed Project operational noise level calculations are included in Appendix 9.2 of the Project Noise and Vibration Analysis (Appendix R of this EIR).

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.

Project Operational Noise Level Increases

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. Refer to Section 9.6 of the Project Noise and Vibration Analysis for a description of the methodology used to calculate Project-related noise level contributions.

Noise levels that would be experienced at receiver locations when Project-source noise was added to the ambient daytime and nighttime conditions are presented in Table 4.11-13, *Daytime Project Operational Noise Level Increases (dBA L_{EQ})*, and Table 4.11-14, *Nighttime Project Operational Noise Level Increases (dBA L_{EQ})*. As indicated on Table 4.11-13, the Project would generate a daytime operational noise level increase ranging from 0 to 0.1 dBA L_{EQ} at the nearest receiver locations. Table 4.11-14 shows that the Project would generate a nighttime operational noise level increases ranging from 0.1 to 0.2 dBA L_{EQ} at the nearest receiver locations. The noise modeling inputs included the planned 14-foot-high screen wall.

Table 4.11-13
DAYTIME PROJECT OPERATIONAL NOISE LEVEL INCREASES (DBA L_{EQ})

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	35.2	L1	71.2	71.2	0.0	3	No
R2	38.6	L2	69.9	69.9	0.0	3	No
R3	47.0	L3	62.6	62.7	0.1	3	No
R4	47.8	L4	63.3	63.4	0.1	3	No
R5	53.2	L5	73.4	73.4	0.0	3	No
R6	36.9	L1	71.2	71.2	0.0	3	No

Source: Urban Crossroads 2022

¹ See Figure 4.11-2 for the receiver locations.

² Total Project daytime operational noise levels as shown on Table 4.11-12.

³ Reference noise level measurement locations as shown on Figure 4.11-1.

⁴ Observed daytime ambient noise levels as shown on Table 4.11-1.

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 as shown on Table 4.11-5.

Table 4.11-14
NIGHTTIME PROJECT OPERATIONAL NOISE LEVEL INCREASES (DBA L_{EQ})

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	34.3	L1	67.8	67.8	0.0	3	No
R2	37.5	L2	68.3	68.3	0.0	3	No
R3	44.3	L3	60.3	60.4	0.1	3	No
R4	46.3	L4	59.7	59.9	0.2	5	No
R5	49.9	L5	72.3	72.3	0.0	3	No
R6	35.8	L1	67.8	67.8	0.0	3	No

Source: Urban Crossroads 2022

¹ See Figure 4.11-2 for the receiver locations.

² Total Project daytime operational noise levels as shown on Table 4.11-12.

³ Reference noise level measurement locations as shown on Figure 4.11-1.

⁴ Observed daytime ambient noise levels as shown on Table 4.11-1.

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 as shown on Table 4.11-5.

The Project-related operational noise level increases would be below the operational noise level increase significance criteria presented on Table 4.11-5. Therefore, the incremental Project operational noise level increase is considered less than significant at all receiver locations.

Traffic-Related Noise Impacts

The expected roadway noise level increases from vehicular traffic were calculated using a computer program that replicates the Federal Highway Administration (FHWA) Traffic Noise Prediction Model-FHWA-RD-77-108, as further described in the Project Noise and Vibration Analysis. Table 6-1 of the Project Noise and Vibration Analysis presents the roadway parameters used to access the Project's off-site transportation impacts. The estimated Project trip generation is presented in Section 4.12, *Transportation*, of this EIR. To quantify the off-site noise levels, the Project-related truck trips were added to the heavy truck category in the FHWA noise prediction model. The addition of Project-related truck trips increases the percentage of heavy trucks in the vehicle mix. This approach recognizes that the FHWA noise prediction model is significantly influenced by the number of heavy trucks in the vehicle mix. The estimated vehicle mix for all without Project traffic scenarios are shown in Tables 6.5 through 6.7 of the Project Noise and Vibration Analysis.

Noise contours were used to assess the Project's incremental 24-hour dBA CNEL traffic-related noise impacts at land uses adjacent to roadways conveying Project traffic. The noise contours represent the distance to noise levels of a constant value and are measured from the center of the roadway for the 70, 65, and 60 dBA CNEL noise levels. The noise contours do not consider the effect of any existing noise barriers or topography that may attenuate ambient noise levels. In addition, because the noise contours reflect modeling of vehicular noise on area roadways, they appropriately do not reflect noise contributions from the surrounding stationary noise sources within the Project study area.

Table 4.11-2 shows the existing without Project conditions CNEL noise levels. The existing without Project exterior noise levels ranges from 57.7 to 77.0 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. Table 4.11-15, *Existing with Project Noise Contours*, shows that the existing conditions with Project traffic noise added would range from 64.5 to 77.1 dBA CNEL.

**Table 4.11-15
EXISTING WITH PROJECT NOISE CONTOURS**

ID	Road	Segment	Receiving Land Use ¹	CNEL at Receiving Land Use (dBA) ²	Distance to Contour from Centerline (Feet)		
					70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
1	Perris Boulevard	south of Harley Knox Boulevard	Non-Sensitive	75.1	140	302	652
2	Perris Boulevard	north of Ramona Expressway	Non-Sensitive	75.2	143	308	663
3	Perris Boulevard	south of Ramona Expressway	Sensitive	75.0	139	298	643
4	Perris Boulevard	south of Rider Street	Sensitive	74.7	131	283	610
5	Redlands Avenue	south of Harley Knox Boulevard	Non-Sensitive	72.5	69	149	321
6	Redlands Avenue	south of Markham Street	Non-Sensitive	72.9	74	159	342
7	Redlands Avenue	north of Ramona Expressway	Non-Sensitive	71.7	61	131	282

ID	Road	Segment	Receiving Land Use ¹	CNEL at Receiving Land Use (dBA) ²	Distance to Contour from Centerline (Feet)		
					70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
8	Harley Knox Boulevard	west of Perris Boulevard	Non-Sensitive	72.8	98	211	454
9	Harley Knox Boulevard	east of Perris Boulevard	Sensitive	71.5	81	174	374
10	Perry Street	west of Redlands Avenue	Non-Sensitive	68.1	RW	59	128
11	Ramona Expressway	west of Indian Avenue	Non-Sensitive	76.6	254	548	1180
12	Ramona Expressway	west of Perris Boulevard	Non-Sensitive	64.5	RW	RW	184
13	Ramona Expressway	east of Redlands Avenue	Sensitive	77.1	273	589	1269
14	Ramona Expressway	east of Evans Road	Sensitive	75.5	214	460	991

Source: Urban Crossroads 2022

¹ Based on a review of existing aerial imagery.

² The CNEL is calculated at the boundary of the right-of-way of the receiving adjacent land use.

RW = Location of the respective noise contour falls within the right-of-way of the road.

Table 4.11-16, *Existing with Project Traffic Noise Level Increases*, shows that the Project off-site noise level increases would range from 0.0 to 10.4 dBA CNEL. The increase in noise levels at two locations would exceed 3; however, these two locations are non-sensitive receivers, and as such, the increase would not result in a significant impact. Based on the significance criteria for off-site traffic noise presented in Table 4.11-5, land uses adjacent to the noise study area roadway segments would experience less than significant noise level impacts due to unmitigated Project-related traffic noise levels.

**Table 4.11-16
EXISTING WITH PROJECT TRAFFIC NOISE LEVEL INCREASES**

ID	Road	Segment	Receiving Land Use ¹	CNEL at Receiving Land Use (dBA) ¹			Incremental Noise Level Increase Threshold ²	
				No Project	With Project	Project Addition	Limit	Exceeded?
1	Perris Boulevard	south of Harley Knox Boulevard	Non-Sensitive	75.1	75.1	0.0	n/a	No
2	Perris Boulevard	north of Ramona Expressway	Non-Sensitive	74.9	75.2	0.3	n/a	No
3	Perris Boulevard	south of Ramona Expressway	Sensitive	74.9	75.0	0.1	3	No
4	Perris Boulevard	south of Rider Street	Sensitive	74.6	74.7	0.1	3	No
5	Redlands Avenue	south of Harley Knox Boulevard	Non-Sensitive	70.8	72.5	1.7	n/a	No
6	Redlands Avenue	south of Markham Street	Non-Sensitive	71.3	72.9	1.6	n/a	No

ID	Road	Segment	Receiving Land Use ¹	CNEL at Receiving Land Use (dBA) ¹			Incremental Noise Level Increase Threshold ²	
				No Project	With Project	Project Addition	Limit	Exceeded?
7	Redlands Avenue	north of Ramona Expressway	Non-Sensitive	71.3	71.7	0.4	n/a	No
8	Harley Knox Boulevard	west of Perris Boulevard	Non-Sensitive	71.5	72.8	1.3	n/a	No
9	Harley Knox Boulevard	east of Perris Boulevard	Sensitive	69.7	71.5	1.8	3	No
10	Perry Street	west of Redlands Avenue	Non-Sensitive	57.7	68.1	10.4	n/a	No
11	Ramona Expressway	west of Indian Avenue	Non-Sensitive	76.4	76.6	0.2	n/a	No
12	Ramona Expressway	west of Perris Boulevard	Non-Sensitive	58.9	64.5	5.6	n/a	No
13	Ramona Expressway	east of Redlands Avenue	Sensitive	77.0	77.1	0.1	3	No
14	Ramona Expressway	east of Evans Road	Sensitive	75.4	75.5	0.1	3	No

Source: Urban Crossroads 2022

¹ Based on a review of existing aerial imagery.

² The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use. The City of Perris does not consider noise increases to non-noise-sensitive uses to be significant.

³ Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4.11-5)?

Mitigation Measures

As previously stated, the Project is required to comply with the applicable PVCCSP EIR mitigation measures described in Section 4.11.2.3. PVCCSP EIR mitigation measures MM Noise 1 through MM Noise 4 would reduce noise levels during construction of the Project.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold b: Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Impact Analysis

Construction-Related Vibration Impacts

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Ground vibration levels associated with various types of construction equipment are summarized on Table 10-5 of the Project Noise and Vibration Analysis (Appendix R). Using the vibration source level of construction equipment and the construction vibration assessment methodology published by the FTA, it is possible to estimate the Project vibration building damage impacts.

Table 4.11-17, *Construction Equipment Vibration Levels*, presents the expected Project-related vibration levels at nearby building structure locations. At distances ranging from 105 to 3,431 feet from the Project construction boundary to the receiver building locations, construction vibration velocity levels are estimated to be between 0.000 and 0.010 PPV (in/sec). In addition, typical construction vibration levels are unlikely to be sustained during the entire construction period but would occur rather only during the times that heavy construction equipment is operating. Based on maximum acceptable vibration threshold identified in the PVCCSP EIR of 0.5 PPV (in/sec), the typical Project construction vibration levels would be below the building damage thresholds at all receiver building locations. Therefore, the Project-related vibration impacts are considered less than significant during the construction activities at the Project site.

Table 4.11-17
CONSTRUCTION EQUIPMENT VIBRATION LEVELS

Receiver ¹	Distance to Con Street Activity (Feet) ²	Typical Construction Vibration Levels PPV (in/sec) ³						Thresholds PPV (in/sec) ⁴	Thresholds Exceeded? ⁵
		Small bulldozer	Jackhammer	Loaded Trucks	Large bulldozer	Vibratory Roller	Highest Vibration Level		
R1	3,431'	0.000	0.000	0.000	0.000	0.000	0.000	0.5	No
R2	2,279'	0.000	0.000	0.000	0.000	0.000	0.000	0.5	No
R3	172'	0.000	0.002	0.004	0.005	0.012	0.005	0.5	No
R4	306'	0.000	0.001	0.002	0.002	0.005	0.002	0.5	No
R5	105'	0.000	0.004	0.009	0.010	0.024	0.010	0.5	No
R6	2,588'	0.000	0.000	0.000	0.000	0.000	0.000	0.5	No

Source: Urban Crossroads 2022

¹ Receiver locations are shown on Figure 4.11-3.

² Distance from Project construction boundary to the receiver building structure.

³ Based on the Vibration Source Levels of Construction Equipment (see Table 10-5 in the Project Noise and Vibration Analysis).

⁴ PVCCSP EIR, Page 4.9-27.

⁵ Does the peak vibration exceed the acceptable vibration thresholds?

PPV = Peak Particle Velocity

Operational-Related Vibration Impacts

Under long-term conditions, the operational activities of the Project would not include or require equipment or facilities that would result in perceptible ground-borne vibration. Trucks would travel to and from the Project site on surrounding roadways; however, vibration and groundborne noise levels for heavy trucks operating at the posted speed limits on smooth, paved, surfaces (as is expected on the Project site and surrounding roadways) typically approach 0.004 in/sec PPV, which is substantially lower than the applicable significance threshold (0.5 in/sec PPV). Accordingly, Project operation would not generate excessive groundborne vibration or groundborne noise levels and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold c: Would the project expose people residing or working in the Project area to excessive noise levels by being 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?

Impact Analysis

As discussed previously, the Project site is located approximately 1.5 miles southeast of MARB/IPA. The noise contour boundaries used to determine the potential aircraft-related noise impacts at the Project site are found on Figure 6-9 of the March Air Reserve Base 2018 Final Air Installations Compatible Uses Zones Study and are presented on **Figure 4.11-6, MARB/IPA Future Airport Noise Contours**. Based on the 2018 noise level contours for the MARB/IPA, the Project site is located outside the MARB/IPA 60 dBA CNEL noise level contour boundary. As discussed in Section 4.11.2.2, the proposed service commercial and warehouse/light industrial uses are considered clearly acceptable land uses within the 60 dBA CNEL. As the Project occurs outside of the 60 dBA CNEL, the Project would not result in the exposure of people residing or working in the Project area to excessive noise levels associated with airport or aircraft operations. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

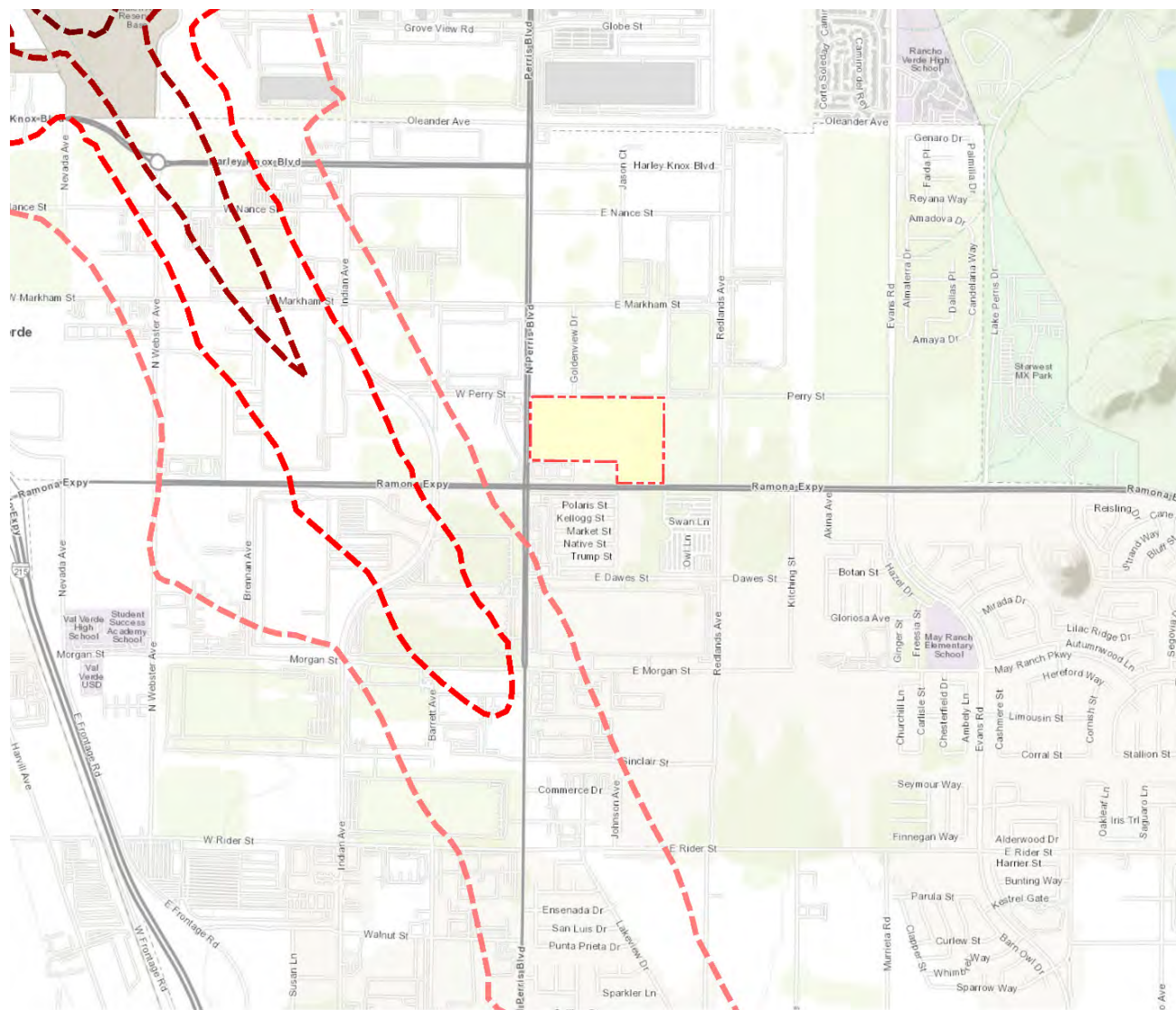
Level of Significance After Mitigation

Impacts would be less than significant.

4.11.5 Cumulative Impacts

Section 4.7.6, Cumulative Impacts, of the PVCCSP EIR discusses cumulative noise impacts in the PVCCSP area. The PVCCSP EIR determined that the noise impact of construction of development and infrastructure projects in the PVCCSP area would not be cumulatively considerable or significant, but offsite impacts due to traffic from buildout of allowed uses under the PVCCSP would exceed significance thresholds along roadway segments adjacent to sensitive receptors resulting in a substantial increase in the ambient noise environment. Therefore, the potential cumulative noise impacts would be significant, and the cumulative noise impacts of PVCCSP-generated traffic would be considerable.

As discussed under the analysis of threshold (a), Project construction-related noise impacts would be less than significant with implementation of PVCCSP EIR mitigation measures MM Noise 1 through MM Noise 4. Likewise, other cumulative projects occurring within the PVCCSP area would be required to comply with PVCCSP EIR mitigation measures MM Noise 1 through MM Noise 4. Some cumulative projects are near the Project site, where construction-related noise impacts could combine to result in a cumulative noise impact. Specifically, several cumulative projects are located west of the Project site, along Ramona Expressway, including the proposed Cali Express Car Wash (located at the northwest corner of Perris Boulevard and Ramona Expressway), JM Realty Perris and Indian (located on the north side of Ramona Expressway, between Indian Avenue and Perris Boulevard), and the Perris and Ramona Warehouse (located on the south side of Ramona Expressway, between Indian Avenue and Perris Boulevard).



LEGEND:

Project Site Boundary

Unmitigated MARB Noise Level Contour Boundaries

	60 dBA CNEL		70 dBA CNEL
	65 dBA CNEL		75 dBA CNEL

Source: Figure 6-9 of the March Air Reserve Base 2018 Final Air Installations Compatible Uses Zones Study.

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Source: Urban Crossroads 2022

If the Project and other cumulative projects occurring within close proximity to the Project site would create construction noise that would affect sensitive receivers concurrently, the Project and other cumulative projects would be required to adhere to construction standards contained in the City of Perris Municipal Code. Additionally, compliance of the Project and other projects occurring within the PVCCSP area with the required PVCCSP EIR noise mitigation would ensure that the Project would not result in a cumulatively considerable construction noise impact. Additionally, the analysis of operational related noise level contributions, presented in Table 4.12-9 and Table 4.12-10, demonstrates that Project-related operational noise would not result in a cumulative increase in noise levels that exceeds the City's thresholds of significance.

In regard to off-site traffic noise levels, Table 7-3 of the Project Noise and Vibration Analysis presents the Existing Plus Ambient Growth Plus Cumulative Projects (2024) without Project conditions CNEL noise levels. The Existing Plus Ambient Growth Plus Cumulative Projects (2024) without Project exterior noise levels are expected to range from 58.0 to 81.1 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. Table 7-4 of the Project Noise and Vibration Analysis shows the Existing Plus Ambient Growth Plus Cumulative Projects (2024) with Project conditions would range from 64.6 to 81.2 dBA CNEL. Table 7-8 of the Project Noise and Vibration Analysis shows that the Project off-site traffic noise level increases would range from 0.0 to 10.1 dBA CNEL. The 10.1 dBA CNEL increase would occur along Perris Street west of Redlands Avenue, and receiving land uses (uses that would be subject to the increased noise levels) are non-sensitive land uses.

Additionally, a 5.4 dBA CNEL increase would occur along Ramona Expressway, west of Indian Avenue; however, receiving land uses along this road segment also include non-sensitive land uses. As discussed previously, the City of Perris does not consider noise increases to non-noise-sensitive uses to be significant; thus, even if noise level increases exceed 3 dBA or 5 dBA, if the increases occur at non-sensitive uses, the noise increase would not result in a significant impact. Noise increases at sensitive receiving land uses would range from 0.0 to 1.0 dBA CNEL, would not exceed a 3 dBA increase, and would therefore, be less than significant. Based on the significance criteria for off-site traffic noise presented in Table 4.11-5, noise-sensitive land uses adjacent to the study area roadway segments would experience less than significant noise level impacts due to unmitigated Project-related traffic noise levels. Table 7-5 of the Project Noise and Vibration Analysis presents the Horizon Year (2045) without Project conditions CNEL noise levels. The Horizon Year (2045) without Project exterior noise levels are expected to range from 58.4 to 81.6 dBA CNEL, without accounting for any noise attenuation features such as noise barriers or topography. Table 7-6 of the Project Noise and Vibration Analysis shows the Horizon Year (2045) with Project conditions would range from 64.7 to 81.6 dBA CNEL. Table 7-9 of the Project Noise and Vibration Analysis shows that the Project off-site traffic noise level increases would range from 0.0 to 9.7 dBA CNEL. The 9.7 dBA CNEL increase would occur along Perris Street west of Redlands Avenue, and receiving land uses are non-sensitive.

Additionally, a 5.1 dBA CNEL increase would occur along Ramona Expressway, west of Indian Avenue; however, this land use is also a non-sensitive land use. Sensitive land uses would experience noise level increases of 0.0 to 0.9 dBA CNEL for the Horizon Year (2045) with the Project addition. As discussed previously, the City of Perris does not consider noise increases for non-sensitive uses to be significant, and noise level increases at sensitive receivers would be up to 0.9 dBA CNEL, which is below City significance criteria. As such, land uses adjacent to the study area roadway segments would experience less than significant noise level impacts due to unmitigated Project-related traffic noise levels. Therefore, the Project would not contribute to a cumulatively considerable off-site traffic noise impact.

The Project would not be exposed to airport-related noise levels more than 60 dBA. Additionally, there are no components of the Project that would cause or contribute to increased aircraft activity in the local area. Thus, the Project would not contribute to a cumulatively considerable impact associated with airport-related noise.

4.11.6 References

Air Force Reserve Command. 2018. Final Air Installations Compatible Use Zones Study, March Air Reserve Base, Riverside, California. 2018.

California Court of Appeal. 2008. *Gray v. County of Madera*, F053661. 167 Cal.App.4th 1099; - Cal.Rptr.3d, October 2008.

California Department of General Services. 2022. 2022 CALGreen Code. *CALGreen*. Available at: <https://codes.iccsafe.org/content/CAGBC2022P1>.

City of Perris. 2022a. Perris Municipal Code, codified through Ordinance No. 1413, adopted January 11, 2022.

2022b. Perris Valley Commerce Center Amendment No. 12 Specific Plan. February 2022. Adopted January 10, 2012, and subsequently amended and approved January 11, 2022.

2005. General Plan Noise Element. August 2005.

Office of Planning and Research. 2019. State of California General Plan Guidelines. 2019.

Riverside County Airport Land Use Commission. 2004. *Riverside County Airport Land Use Compatibility Plan*. October 14, 2004.

Urban Crossroads. 2022. OLC3 (DPR22-00006, TPM22-05048, SPA22-05047) Noise and Vibration Analysis. October 18, 2022.

4.12 TRANSPORTATION

This section assesses transportation impacts resulting from implementation of the Project. In accordance with Senate Bill (SB) 743, further discussed under 4.12.2 Existing Policies and Regulations, below, the California Natural Resources Agency (CNRA) adopted changes to the State CEQA Guidelines in December 2018, which identify that vehicle miles traveled (VMT) is the appropriate metric to evaluate a project's transportation impacts. As of December 2018, when the revised State CEQA Guidelines were adopted, automobile delay, as measured by level of service (LOS) and other similar metrics, no longer constitutes a significant environmental effect under CEQA. Lead agencies in California must begin using VMT to evaluate project transportation impacts no later than starting on July 1, 2020. The City of Perris adopted its Transportation Impact Analysis Guidelines for CEQA, which includes guidance for conducting the required VMT analysis, on June 9, 2020.

Notwithstanding the current method of analysis for CEQA purposes, the PVCCSP EIR mitigation measure MM Trans 7 requires project-level traffic impact studies to be prepared for individual development projects in the PVCCSP area. The City of Perris continues to require the Project-level traffic analysis to inform the development of conditions of approval for individual projects implementing the PVCCSP. Information presented in this section is primarily based on the following Project-level traffic analysis document, which is also listed in Section 4.12.7 References:

- Traffic Analysis for the OLC3 (DPR22-00006, TPM22-05048, SPA22-05047), prepared by Urban Crossroads (May 2023) (Appendix S of this EIR).

The land uses evaluated within the Traffic Analysis rely on a previous Project description that would generate more trips compared to the proposed Project. Therefore, the analysis provided presents a conservative analysis of anticipated impacts.

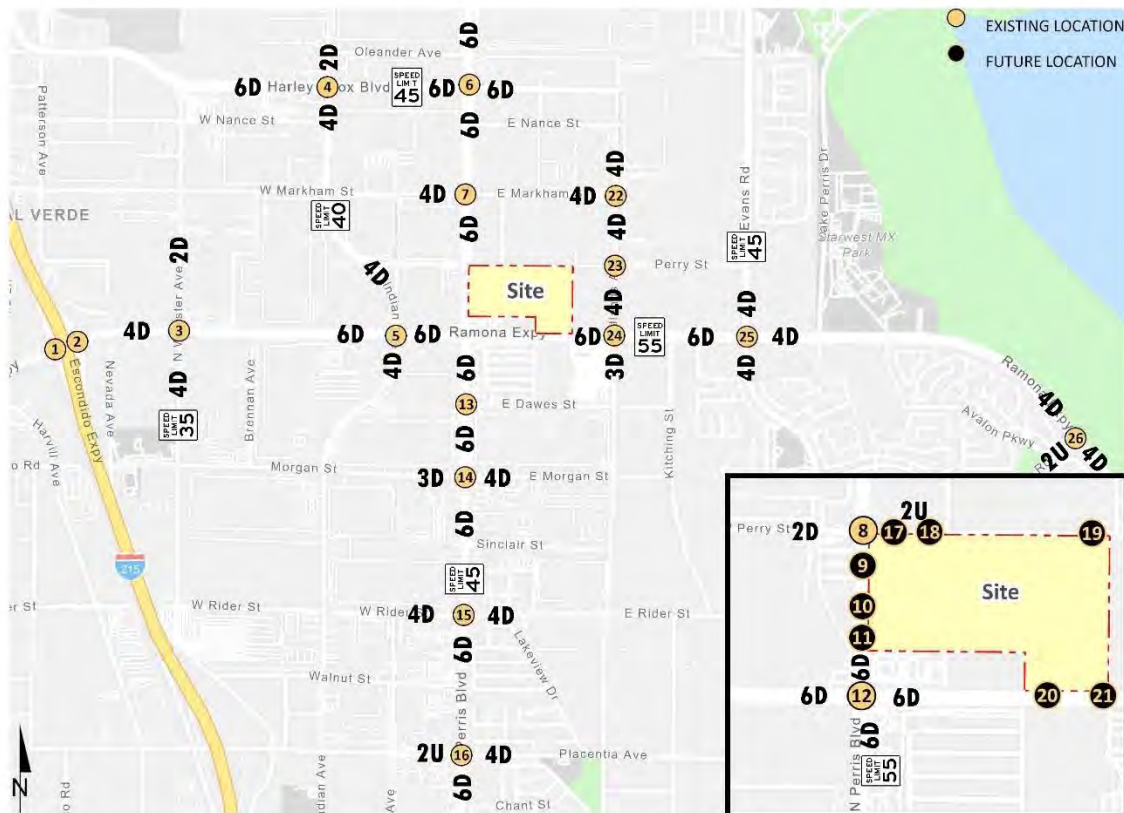
There were no NOP comment letters received on the 2022 or 2023 NOPs. At the July 20, 2022 EIR public scoping meeting, the Planning Commissioners requested that the EIR address traffic impacts and use of truck routes that avoid sensitive receptors.

4.12.1 Existing Setting

4.12.1.1 Regional and Local Roadway Circulation System

As identified in the PVCCSP EIR, there are two primary transportation facilities located within the PVCCSP area: Interstate 215 (I-215) and Ramona Expressway. I-215, traversing north to south, is the only State highway located in the PVCCSP area and parallels its western boundary. Ramona Expressway is a City roadway that traverses east to west through the PVCCSP area. **Figure 4.12-1, Existing Roadway Configurations**, depicts the existing circulation system (e.g., number of lanes, divided or undivided roadway, etc.) in the Project vicinity.

Under existing conditions, regional access to the Project area is accessible from the I-215 Freeway via Ramona Expressway, Harley Knox Boulevard, and Placentia Avenue interchanges. Local access to the Project area is currently provided from Ramona Expressway, Perris Boulevard, and Perry Street.



1	1-215 SB Ramps & Ramona Exwy.	2	1-215 NB Ramps & Ramona Exwy.	3	Webster Av. & Ramona Exwy.	4	Indian Av. & Harley Knox Bl.	5	Indian Av. & Ramona Exwy.

- = Traffic Signal
- = Stop Sign
- 4** = Number of Lanes
- D** = Divided
- U** = Undivided
- DEF** = Defacto Right Turn
- RTO** = Right Turn Overlap
- = Speed Limit (MPH)

Source: Urban Crossroads 2022

4.12.1.2 Truck Routes

The PVCCSP designated truck routes are, Harley Knox Boulevard, Indian Avenue, Redlands Avenue, Morgan Street, and portions of Rider Street, as shown on **Figure 4.12-2, PVCCSP Truck Route Plan**. Ramona Expressway and Perris Boulevard are no longer identified as a designated truck routes. It should also be noted that the City's policy is for trucks to utilize the Harley Knox Boulevard interchange at I-215. As such, the truck route for the Project area under existing conditions is for truck traffic to travel north on Redlands Avenue and then west on Harley Knox Boulevard to I-215. These truck routes were adopted on November 17, 2021 as a Specific Plan Amendment to the PVCCSP circulation plan discussion and maps related to truck routes. Two full-access designated driveways for trucks would be provided on Perry Street. The driveways would be modified to accommodate a 45-foot curb radius for the egress turning radius of trucks. The proposed truck routes were analyzed in the Traffic Analysis prepared by Urban Crossroads (Appendix S).

4.12.1.3 Transit Service

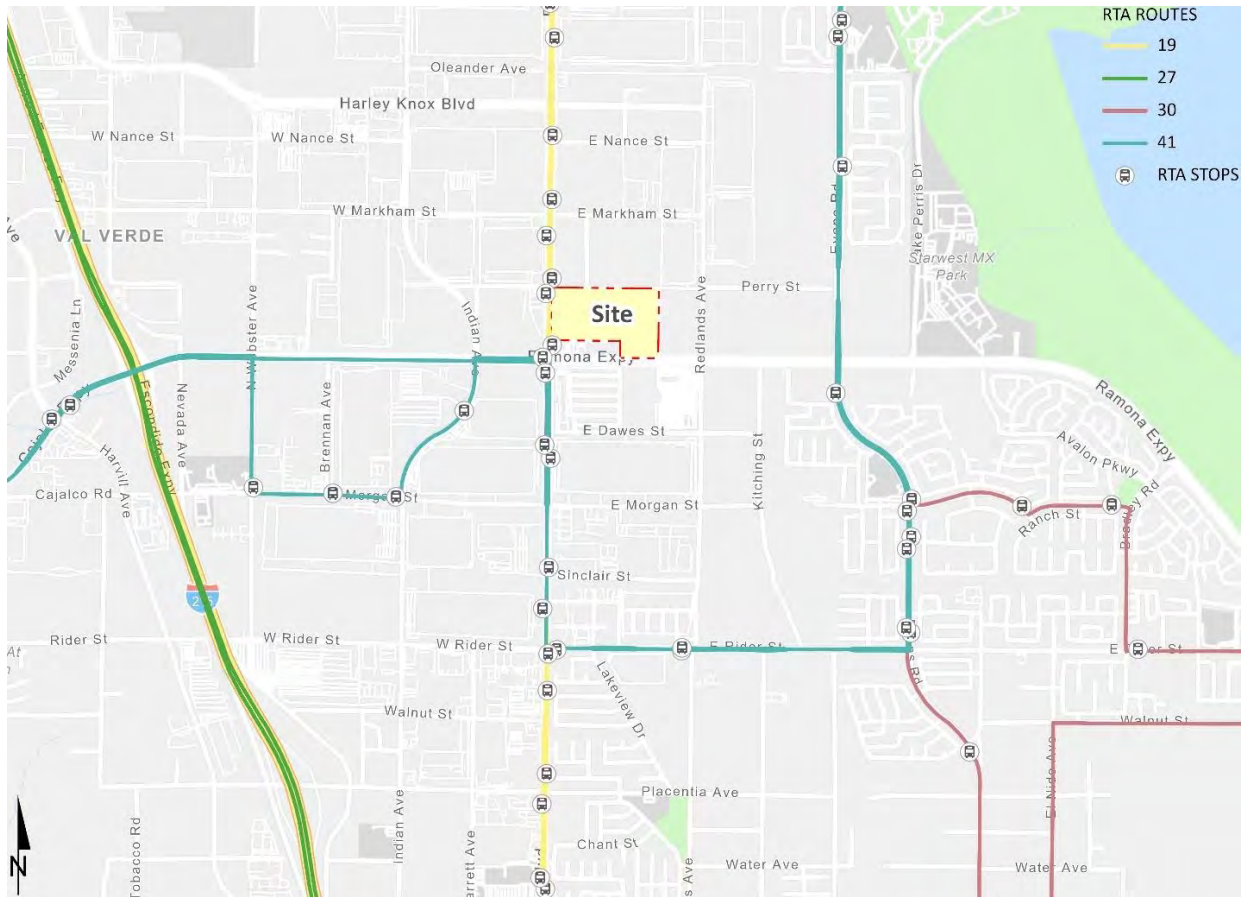
Transit service in the Project area is provided by the Riverside Transit Agency (RTA), a public transit agency serving the Riverside County region. As shown in **Figure 4.12-3, Existing Transit Routes**, existing RTA Routes 19 and 27 run along Ramona Expressway and Perris Boulevard. The existing route along Ramona Expressway does not extend east of Perris Boulevard; however, there are a number of transit stops along Perris Boulevard, including two near the Project site. Existing bus stops near the Project site include one along Perris Boulevard, approximately 100 feet south of the western Project boundary, and along Perris Boulevard, approximately 140 feet north of Perry Street. Additionally **Figure 4.12-4, PVCCSP Mass Transit Routes**, identifies the transit routes delineated in the PVCCSP. As shown in **Figure 4.12-4**, the PVCCSP identifies the extension of transit on Ramona Expressway, east of Perris Boulevard (which would be adjacent to the south of the Project site) as a potential transit route. Transit service is reviewed and updated by the RTA periodically to address ridership, budget, and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate.

4.12.1.4 Bicycle and Pedestrian Facilities

The City of Perris General Plan delineates existing and recommended bikeways in the City, as shown on **Figure 4.12-5, City of Perris General Plan Bicycle Facilities**. PVCCSP bicycle and trail facilities are shown on **Figure 4.12-6, PVCCSP Bicycle and Trail Facilities**, which show the proposed trails connected with major features within the City. There is a proposed separated Class IV bikeway along Ramona Expressway and a proposed buffered bike Class IIB bike lane along Perris Boulevard in the vicinity of the Project. There are limited existing pedestrian facilities in the vicinity of the Project site. The future Ramona Expressway Regional trail is planned for the north side of Ramona Expressway running east and west. The trail would connect the County Regional Trail on the east to Metrolink on the west side of I-215, and extend to the Lake Perris Fairgrounds. Field observations and traffic counts conducted in August 2022 as part of the Traffic Analysis effort indicate light pedestrian and bicycle activity within the Project vicinity associated with the adjacent commercial uses.



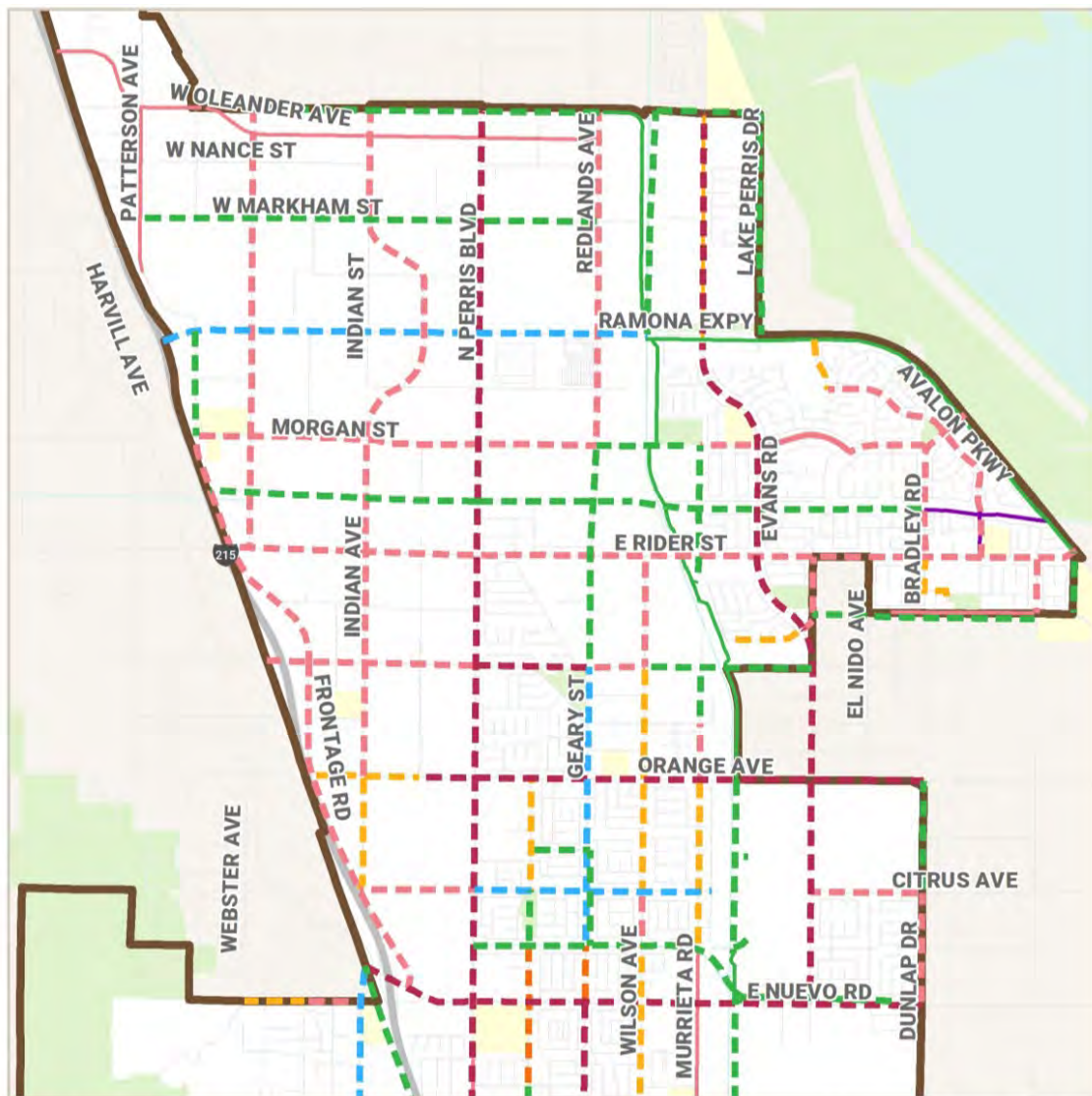
Source: City of Perris 2022



Source: Urban Crossroads 2022



Source: City of Perris 2022



Existing / Recommended Bikeways

- Shared-Use Path (Class I)
- Bicycle Lane (Class II)
- Buffered Bike Lane (Class IIB)
- Bicycle Route (Class III)
- Bicycle Boulevard (Class IIIB)
- Separated Bikeway (Class IV)
- Walking Trail

Destinations + Boundaries

- City Boundary
- School
- Park or Open Space

0 0.5 1 Miles



Sources:
SCAG
UC Berkeley TIGRS
OSM
Caltrans

Source: City of Perris 2020



Source: City of Perris 2022

4.12.2 Existing Policies and Regulations

4.12.2.1 State

Senate Bill 743 and VMT-Based Analyses

Senate Bill 743 (Steinberg 2013), which was codified in Public Resources Code section 21099, required changes to the State CEQA Guidelines regarding the analysis of transportation impacts. As one appellate court explained: “During the last 10 years, the Legislature has charted a course of long-term sustainability based on denser infill development, reduced reliance on individual vehicles and improved mass transit, all with the goal of reducing greenhouse gas emissions. Section 21099 is part of that strategy...” (Covina Residents for Responsible Development v. City of Covina (2018) 21 Cal.App.5th 712, 729.) Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” (Id., subd. (b)(1); see adopted State CEQA Guidelines, §15064.3, subd. (b) [Criteria for Analyzing Transportation Impacts].) To that end, in developing the criteria, OPR has proposed, and the California Natural Resources Agency has certified and adopted, changes to the State CEQA Guidelines that identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project’s transportation impacts. With the California Natural Resources Agency’s certification and adoption of the changes to the State CEQA Guidelines, automobile delay, as measured by “level of service” and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA as of July 1, 2020. (Pub. Resources Code, §21099, subd. (b)(3).)

4.12.2.2 Regional

SCAG Regional Transportation Plan/Sustainable Communities Strategy

SCAG is a regional agency established pursuant to California Government Code §6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The City of Perris is within SCAG’s regional authority. On September 3, 2020, SCAG adopted the 2020-2045 RTP/SCS (also referred to herein as “Connect SoCal”) with goals to: (1) Encourage regional economic prosperity and global competitiveness; (2) Improve mobility, accessibility, reliability, and travel safety for people and goods; (3) Enhance the preservation, security, and resilience of the regional transportation system; (4) Increase person and goods movement and travel choices within the transportation system; (5) Reduce greenhouse gas emissions and improve air quality; (6) Support healthy and equitable communities; (7) Adapt to a changing climate and support an integrated regional development pattern and transportation network; (8) Leverage new transportation technologies and data-driven solutions that result in more efficient travel; (9) Encourage development of diverse housing types in areas that are supported by multiple transportation options; and (10) Promote conservation of natural and agricultural lands and restoration of habitats (SCAG 2020, p. 9). Performance measures and funding strategies are also included to ensure that the adopted goals are achieved through implementation of the RTP.

Connect SoCal includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. Connect SoCal also provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (ARB); these objectives were provided in a direct response to Senate Bill 375 (SB 375) which was

enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. Connect SoCal is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods.

The Goods Movement Technical Report of Connect SoCal is applicable to the Project because the Project entails a use that is closely associated with, and relies directly on, the goods movement system (e.g., manufacturing, construction, retail trade, wholesale trade and transportation, and warehousing). In April 2018, SCAG published Industrial Warehousing in the SCAG Region (SCAG 2018). According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region's freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, state highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet of warehouse building space, and undeveloped land that could accommodate an additional 338 million square feet of new warehouse building space. These regions attract robust logistics activities and are a major reason the region is a critical mode in the global supply chain.

4.12.2.3 Local

The Circulation, Conservation, and Open Space elements of the City's General Plan identify goals and policies related to vehicular and non-vehicular transportation and circulation.

City of Perris General Plan Circulation Element

The purpose of the Circulation Element of the General Plan is to provide for a safe, convenient, and efficient transportation system for the city. To meet this objective, the Circulation Element has been designed to accommodate the anticipated transportation needs based on the estimated intensities of various land uses within the region. The City of Perris General Plan goals and policies applicable to the proposed Project are as follows:

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 (refer to City of Perris General Plan).

Policy I.B - Support development of a variety of transportation options for major employment and activity centers including direct access to commuter facilities, primary arterial highways, bikeways, park-n-ride facilities, and pedestrian facilities.

Policy I.D - Encourage and support the development of projects that facilitate and enhance the use of alternative modes of transportation. Conservation Element Policy IX.A. Encourage land uses and new development that support alternatives to the single occupant vehicle. Open Space Element Policy II.A. All development will be accessible by a trail system.

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.

Policy III.A - Implement a transportation system that accommodates and is integrated with new and existing development and is consistent with financing capabilities.

Policy IV.A - Provide non-motorized alternatives for commuter travel as well as recreational opportunities that maximize safety and minimize potential conflicts with pedestrians and motor vehicles.

Policy V.A - Provide for safe movement of goods along the street and highway system.

Policy VII.A - Implement the Transportation System in a manner consistent with Federal, State, and local environmental quality standards and regulations.

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 of Perris General Plan Conservation Element

The City of Perris General Plan goals and policies applicable to the proposed Project are as follows:

Policy IX.A - Encourage land uses and new development that support alternatives to the single occupant vehicle.

City of Perris General Plan Open Space Element

The City of Perris General Plan goals and policies applicable to the proposed Project are as follows:

Policy II.A - All development will be accessible by a trail system.

City of Perris Active Transportation Plan

The City adopted its Active Transportation Plan (ATP) in December 2020. The 2020 ATP represents a new commitment by the City to walking and biking by moving away from the auto-centric, inequitable approach of the past and toward a sustainable, multi-modal transportation system that serves all residents, regardless of age, ability, identity, or income (City of Perris 2020a). The ATP is guided by an equity framework, which prioritizes equity and the needs of vulnerable residents. The strategies and components of the APT will assist the City in meeting the four goals established by the ATP: improve safety and health, improve access and comfort, enhance transportation affordability, and commit to maintain and expand the bicycle and pedestrian network.

The ATP identifies a recommended Buffered Bike Lane (Class IIB) along Perris Boulevard, adjacent to the west of the Project site, and a recommended Separated Bikeway (Class IV) along Ramona Expressway, adjacent to the south of the Project site.

4.12.2.4 Local and Regional Funding Mechanisms

Western Riverside County Association of Governments Transportation Uniform Mitigation Fee

The Western Riverside Council of Governments (WRCOG) established a consolidated Transportation Uniform Mitigation Fee (TUMF) program for all western Riverside County, which commenced in 2003. The establishment of TUMF was based on the desire to establish a single, uniform fee program to mitigate the cumulative impacts of new development on the sub-region's arterial highway system rather than having multiple and potentially uncoordinated fee programs across the region. WRCOG is responsible for establishing and updating TUMF payment rates, based on a TUMF Program Nexus Study, which is periodically updated to consider the impact of future development on the subregion's system of highways and arterial roads. The City of Perris collects the fees that are then passed on to WRCOG. TUMF is focused on improvements necessitated by regional growth. The City may grant developers a credit against the specific components of fees for the dedication of land, or the construction of facilities identified in the list of improvements funded by each of the fee programs.

North Perris Road and Bridge Benefit District

The North Perris Road and Bridge Benefit District (NPRBBD) is comprised of approximately 3,500 acres of land located in the northern portion of the City of Perris and is consistent with the boundary of the PVCCSP. The Project site is within the boundaries of the NPRBBD. The purpose of the NPRBBD is to improve the efficiency of the financing of specific regional road and bridge improvements that are determined to provide benefit to the developing properties within the NPRBBD boundary. In addition, the NPRBBD includes additional improvements to supplement the TUMF and City of Perris Development Impact Fee (DIF) program network (discussed below). NPRBBD fees are inclusive of TUMF and DIF. The City of Perris DIF program is discussed below. A significant portion of the fees collected through this mechanism are earmarked for use within the boundary sufficient to fully fund the included improvements. The balance of TUMF is transmitted to WRCOG for use in addressing cumulative impacts elsewhere within Western Riverside County. The City treats the DIF component collected within the NPRBBD in a similar way to ensure the local circulation network outside the program boundaries is adequately addressed. NPRBBD fees are paid as a one-time fee payment to the City prior to the issuance of a building permit and include the TUMF and City DIF fees. The NPRBBD fee funds certain facilities described in the TUMF and DIF programs and additional improvements to supplement the TUMF and DIF network.

City of Perris Development Impact Fee Program

In 1991, the City of Perris created a DIF program to impose and collect fees from new residential, commercial, and industrial development for the purpose of funding roadways and intersections necessary to accommodate City growth as identified in the City's General Plan Circulation Element. This DIF program has been successfully implemented by the City since 1991 and was updated in 2014. The City updated the DIF program to add new roadway segments and intersections necessary to accommodate future growth and to ensure that the identified street improvements would operate at or above the City's LOS performance threshold. The City's DIF program includes facilities that are not part of, or which may exceed, improvements identified and covered by the TUMF program. As a result, the pairing of the regional and local fee programs provides a more comprehensive funding and implementation plan to ensure an adequate and interconnected transportation system.

Under the City's DIF program, the City may grant developers a credit against specific components of fees when those developers construct certain facilities and landscaped medians identified in the list of improvements funded by the DIF program.

Similar to the TUMF Program, after the City's DIF fees are collected through the NPRBBD, they are placed in a separate interest-bearing account pursuant to the requirements of Government Code sections 66000 et seq. The timing to use the DIF fees is established through periodic capital improvement programs, which are overseen by the City's Public Works Department. Periodic traffic counts, review of traffic accidents, and a review of traffic trends throughout the City are also periodically performed by City staff and consultants. The City uses this data to determine the timing of the improvements listed in its facilities list. The City also uses this data to ensure that the improvements listed on the facilities list are constructed before the LOS falls below the LOS performance standards adopted by the City. In this way, the improvements are constructed before the LOS falls below the City's LOS performance thresholds. The City's DIF program establishes a timeline to fund, design, and build the improvements.

The City has an established, proven track record with respect to implementing the City's DIF Program. Many of the intersections included in the Project-specific TIA are at various stages of widening and improvement based on the City's collection of DIF fees. Under the DIF program, because of the City's continual monitoring of the local circulation system, the City insures that DIF improvements are constructed prior to when the LOS would otherwise fall below the City's established performance criteria.

Measure A

Measure A, Riverside County's half-cent sales tax for transportation, was adopted by voters in 1988 and extended in 2002. It will continue to fund transportation improvements through 2039. Measure A funds a wide variety of transportation projects and services throughout the County. The Riverside County Transportation Commission (RCTC) is responsible for administering the program. Measure A dollars are spent in accordance with a voter-approved expenditure plan that was adopted as part of the 1988 election.

Fair Share Contribution

Project mitigation may include a combination of fee payments to established programs (e.g., TUMF, NPRBBD, and/or DIF), construction of specific improvements, payment of a fair share contribution toward future improvements, or a combination of these approaches. Improvements constructed by development may be eligible for a fee credit or reimbursement through the program, where appropriate (to be determined at the City's discretion). When off-site improvements are identified with a minor share of responsibility assigned to proposed development, for improvements not funded through payment of the NPRBBD, the approving jurisdiction may elect to collect a fair share contribution or to require the development to construct improvements. Improvements included in a defined program (i.e., NPRBBD) and constructed by development may be eligible for a fee credit or reimbursement through the program where appropriate.

4.12.2.5 Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The PVCCSP includes Standards and Guidelines applicable to the Project and relevant to transportation. These Standards and Guidelines summarized below are incorporated as part of the Project and are assumed in the analysis presented in this section. The Project is required to comply with these Standards and Guidelines. The chapters/section numbers provided correspond to the PVCCSP chapters/sections.

On-Site Design Standards and Guidelines (Chapter 4.0 of the PVCCSP)

4.2 On-Site Standards and Guidelines

4.2.2 Site Layout for Commerce Zones

- **4.2.2.2 Vehicular Access and On-Site Circulation**

- **Establish Truck Routes.** Truck routes are required for trucks having a maximum gross weight of 5 tons. These routes (Figure 3.0-3 in the PVCCSP) should avoid conflicts with established communities and be separated from passenger vehicles where possible.
- **Driveway Spaces.** Table 4.0-2, Driveway Spacing, identifies appropriate driveway spacing from various roadway types.
- **Minimize Vehicular Conflict.** Site access should promote safety, efficiency, convenience, and minimize conflict between employee/customer vehicles and large trucks by creating separate access points when possible.
- **Access Points Easily Identifiable.** Entry drives should be easily identifiable using enhanced landscaping and special pavements (accent colors, textures, and patterns). Landscaped medians should be provided on major project entrances. Signage should also be used to identify customer and service entrances. Driveways used exclusively for deliveries or loading activities are excluded.
- **Shared Access.** The City encourages shared driveway access whenever possible. Reciprocal ingress/egress access easements shall be provided for circulation and parking to facilitate ease of vehicular movement between properties and to limit the number of vehicular access points to adjoining streets.
- **Emergency Vehicle Access.** Design of primary drive aisles must allow for emergency vehicle access. Typically, this requirement is a minimum of 20 feet. However, applicants are encouraged to check with the City's Fire Marshall.
- **Visual Link to Building and Entry.** A well-designed entry should offer a visual link to the building and entry using business signs, paving, and landscaping.
- **Primary Entry Drive/Location of Building.** The primary entry drive should be oriented toward the main entrance of the building.
- **Entry Median.** A landscaped center median shall be provided at the primary entrance for sites requiring 100 or more parking spaces.

- **Landscape Parkways/Sides of Entry.** Landscaped parkways shall border both sides of all entry drives to create a sense of arrival.
 - **Dual Axle Entrances.** Entrances used primarily or solely by dual axle vehicles shall provide a minimum 50-foot radius curb returns.
 - **Avoid Back-up onto Public Streets.** To avoid back-up onto public streets, entry drive approaches shall avoid conflict points such as parking stalls, internal drive aisles, or pedestrian crossings. Final determination of the driveway approach length shall be determined by the Planning Manager and the City Engineer after consideration of the project site design.
 - **Minimize Interactions.** Minimize interactions between trucks, cars, and pedestrians by having separate circulation. The placement of loading areas and dock facilities should minimize the interaction between trucks and visitor/customer automobiles. Access to loading and delivery areas should be separated from parking areas to the greatest extent feasible.
 - **Consideration of Large Truck Maneuverability.** The design and location of loading facilities should take into consideration the specific dimensions required for the maneuvering of large trucks and trailers into and out of loading positions at docks or in stalls and driveways.
- **4.2.2.3 Pedestrian Access and On-Site Circulation**
 - **Avoid Conflicts Between Pedestrian and Vehicular Circulation.** Provide a system of pedestrian walkways that avoids conflicts with vehicle circulation through the utilization of separated pathways for direct pedestrian access from public rights-of-way and parking areas to building entries and throughout the site with internal pedestrian linkages.
 - **Adequate Vehicle Spacing for Drive-Through Service.** Businesses with drive-through service shall provide adequate stacking to accommodate eight vehicles in the drive-through lane from the prior to each pick-up window to avoid conflict with on-site circulation.
 - **Primary Walkway.** Primary walkways should be five feet wide at a minimum and conform to [Americans with Disabilities Act (ADA)]/Title 24 standards for surfacing, slope, and other requirements.
 - **Pedestrian Linkages to Public Realm.** A minimum five-foot wide sidewalk or pathway, at or near the primary drive aisle, should be provided as a connecting pedestrian link from the public street to the building(s), as well as to systems of mass transit, and other on-site building(s).
 - **4.2.2.4 Parking and Loading**
 - **Avoid Long Continuous Drive Aisles.** Large parking lots should avoid long, continuous drive aisles to limit the opportunity for high-speed vehicular travel. Where long drive aisles best serve a site, they should utilize curves and stop signs or textured pavement at strategic locations in place of speed bumps.

- **Bicycle Racks.** Facilities with 200 or more required parking spaces shall provide a bicycle parking area to accommodate no less than 5 locking bicycles. Facilities with 500 or more required parking spaces shall provide bicycle parking to accommodate no less than 15 locking bicycles. Bicycle parking shall be located near main entrances of buildings, adjacent to landscape areas.

Off-Site Design Standards and Guidelines (from Chapter 5.0 of the PVCCSP)

5.2 Off-Site Vehicular Circulation

- **5.2.1 Roadway Standards and Guidelines**

- **Roadway Design Requirements.** All intersection spacing and/or access openings shall be in compliance with Table 5.0-1 (in the PVCCSP), or as otherwise approved by the City Engineer.
- **Cross-Sections.** All Specific Plan roads shall be constructed per the standard cross-sections shown in Figure 5.0-1 (in the PVCCSP).
- **Lane Requirements/Expanded Intersections.** All Specific Plan roads shall be constructed per the lane requirements outlined in Table 5.0-2 (in the PVCCSP) and provide expanded intersections as depicted in Figures 5.0-2a to Figure 5.0-2d (in the PVCCSP). Any roadway with classification of a Secondary Arterial and greater that intersects with an Expressway, Arterial, Secondary Arterial or Collector, shall provide additional turn lanes as outlined in Table 5.0-2 (in the PVCCSP).
- **Intersection Sight Distance.** Intersections, including driveways, shall comply with required site distance as shown in Figure 5.0-3 (in the PVCCSP).
- **Traffic Signal Interconnect.** Each project will be required to install signal interconnect conduit and pull boxes on project frontage located along roadways designated as Secondary Arterials or greater. Pull boxes shall be spaced a minimum of 500 feet apart. All conduit shall be 2-inch galvanized steel conduit. All conduits placed under paving shall be installed without open cutting. All pull boxes shall be No. 5. Pull Boxes in the unimproved areas that are not protected by curb and gutter shall be traffic bearing type.
- **No Textured Pavement Within City Right-of-Way.** No textured pavement accents will be permitted within the City maintained rights-of-way, unless part of a gateway, mid-block crossing of [Metropolitan Water District] Trail or otherwise approved by the City Engineer.

- **5.2.2 Truck Route Standards and Guidelines**

- **Establish Truck Routes.** Routes in which large trucks will travel will be established to avoid conflicts with established residential communities and to improve the flow of traffic through the City. Refer to Figure 3.0-3 (in the PVCCSP) for City established truck routes.
- **Large Turning Radius.** A 35-foot turning radius shall be provided at intersections along truck route. A minimum 40-foot turning radius shall be required for driveways with 50 feet being the preferred driveway turning radius.

- **Increased Stacking.** Typical stacking distance at turn pockets is 200 feet. Increased stacking distance in turn pockets along the truck routes shall be provided as deemed necessary by the City and City Engineer.
 - **Acceleration/Deceleration Lanes.** Acceleration, deceleration, as well as right-turn lanes may be required to prevent traffic congestion at truck entrances and exits.
 - **Mitigation Measures.** Each development project shall comply with the on-site and off-site street improvement recommendations and mitigation measures outlined in the subsequent traffic studies for each individual project, or as otherwise interpreted by the City Engineer.
- **5.2.3 Bus Standards and Guidelines**
 - **Projects Along Identified Routes.** Projects located along existing and/or future bus routes are encouraged to coordinate with RTA early in the process to determine transit requirements such as location, bus turnouts and seating and shelters.
 - **Additional Public Right-of-Way.** Additional public right-of-way may be required to accommodate the bus turnout and the minimum sidewalk requirement.
 - **Bus Stops at Commercial Centers.** Bus stops should be provided at large commercial centers located along existing and future bus routes. Bus stops should be designed to allow convenient access by transit, which includes a covered shelter, trash receptacle and safety lighting in accordance with the City's selected standard for the area. Early coordination with RTA is encouraged to determine if additional right-of-way is required to accommodate bus stops.

Commercial Design Standards and Guidelines (from Chapter 7.0 of the PVCCSP)

7.2 Commercial Development Standards and Guidelines

- **7.2.1 Commercial Site Layout**
 - **Vehicular Access and On-site Circulation.** Businesses with drive-thru service(s) shall provide adequate stacking to accommodate eight vehicles prior to each pick-up window to avoid conflict with on-site circulation.
 - **Internal Pedestrian Walkways.** Internal walkway should provide connection between building entries, plazas, and courtyards within the project and be covered when possible.

Industrial Design Standards and Guidelines (from Chapter 8.0 of the PVCCSP)

8.2 Industrial Development Standards and Guidelines

- **8.2.1 Industrial Site Layout**
 - **Vehicular/Truck Access and On-site Circulation.** Truck driveways should be separated from passenger traffic to the greatest extent possible and provide for 50-foot turning radii.

- **Interior Drive Aisles for Trucks.** Truck drive aisles shall be a minimum of 40-feet wide.

The PVCCSP EIR contains the following transportation mitigation measures for the PVCCSP and implementing projects (PVCCSP EIR mitigation measure MM Trans 6 is not applicable to the Project as it is specific to projects adjacent to the Metropolitan Water District Trail within the PVCCSP area, and thus, is not listed below):

- 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.
- 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.
- 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, Development Impact Fee (DIF), 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.
- 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 provision of bus routing in the project area that would require bus stops at the project access points. If the RTA has future for the establishment of a bus route that will 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.
- MM Trans 5** Bike racks shall be installed in all parking lots in compliance with City of Perris standards.
- MM Trans 7** Implementing project-level traffic studies shall be required for all subsequent implementing development proposals within the boundaries of the PVCC as approved by the City of Perris Engineering Department. These subsequent traffic studies shall identify specific project deficiencies 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.

MM Trans 8 Proposed mitigation measures resulting from project-level traffic studies shall be coordinated with the NPRBBD to ensure that they are in conformance with the ultimate improvements planned by the NPRBBD. The applicant shall be eligible to receive proportional credits against the NPRBBD for construction of project level mitigation that is included in the NPRBBD.

Project Design Features

As required by PVCCSP EIR mitigation measure MM Trans 1, the site-adjacent roadway and site access improvements needed to accommodate site access and maintain acceptable peak hour operations for the Project that were recommended in the Traffic Analysis have been incorporated into the Project. These improvements are identified below as Project Design Features (PDFs). They are included in this section to ensure that they are implemented and tracked through the Project's Mitigation Monitoring and Reporting Program. Additionally, as required by PVCCSP EIR mitigation measure MM Trans 8, required improvements shall be coordinated with the NPRBBD to ensure that they are in conformance with the ultimate improvements planned by the NPRBBD. The Project would include the site access improvements listed below as Project Design Features.

Site Access Improvements

PDF-TRA-1 Prior to the issuance of occupancy permits, the Project proponent shall have the following site access improvements constructed, consistent with the PVCCSP and the City of Perris General Plan's Circulation Element. The Project proponent shall make the following improvements, as required by the final Conditions of Approval for the Project and applicable City of Perris standards:

- Perris Boulevard & Driveway 1 (#9) – Install a stop sign on the westbound approach (Project driveway) and construct a westbound right turn lane.
- Perris Boulevard & Driveway 2 (#10) – Install a stop sign on the westbound approach (Project driveway) and construct a westbound right turn lane.
- Perris Boulevard & Driveway 3 (#11) – Install a stop sign on the westbound approach (Project driveway) and construct a westbound right turn lane.
- Driveway 4 & Perry Street (#17) – Install a stop sign on the northbound approach (Project driveway) and construct a northbound right turn lane.
- Driveway 5 & Perry Street (#18) – Install a stop sign on the northbound approach (Project driveway) and construct a northbound shared left-right turn lane.
- Driveway 6 & Perry Street (#19) – Install a stop sign on the northbound approach (Project driveway) and construct a northbound right turn lane.
- Driveway 7 & Ramona Expressway (#20) – Install a stop sign on the southbound approach (Project driveway) and construct a southbound right turn lane.

- Driveway 8 & Ramona Expressway (#21) – Install a traffic signal, construct a southbound left turn lane and right turn lane, and construct an eastbound left turn lane with a minimum of 200-feet of storage.
- Driveway 9 & Perry Street (#27) – The following improvements are necessary to accommodate site access: Project to install a stop sign on the northbound approach (Project driveway) and Project to construct a northbound shared left-right turn lane.
- Ramona Expressway is an east-west oriented roadway located along the Project's southern boundary. Ramona Expressway is currently constructed to its ultimate half-section pavement width as an Expressway (184-foot right-of-way) between the Project's western and eastern boundaries consistent with the PVCCSP and the City of Perris General Plan Circulation Element. However, the Project shall implement sidewalk, curb-and-gutter, and landscaping improvements on Ramona Expressway along the Project's frontage from the Project's western boundary to the Project's eastern boundary to accommodate the site access driveways.
- Perris Boulevard is a north-south oriented roadway located along the Project's western boundary. Perris Boulevard is currently constructed at its ultimate half-section pavement width as an Arterial (128-foot right-of-way) between Perry Street and the Project's southern boundary consistent with the PVCCSP and the City of Perris General Plan Circulation Element. However, the Project shall implement sidewalk, curb-and-gutter, and landscaping improvements on Perris Boulevard along the Project's frontage from Perry Street to the Project's southern boundary to accommodate the site access driveways.
- Perry Street is an east-west oriented roadway located on the Project's northern boundary. Perry Street is currently constructed at its ultimate half-section pavement width as a Local roadway (60-foot right-of-way) between Perris Boulevard and the Project's eastern boundary consistent with the PVCCSP and the City of Perris General Plan Circulation Element. However, the Project shall implement sidewalk, curb-and-gutter, and landscaping improvements on Perry Street along the Project's frontage from Perris Boulevard to the Project's eastern boundary to accommodate the site access driveways.

PDF-TRA-2 On-site traffic signing and striping should be implemented agreeable with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD) and in conjunction with detailed construction plans for the Project site.

PDF-TRA-3 Sight distance at each Project access point shall be reviewed with respect to standard California Department of Transportation (Caltrans) and City of Perris sight distance standards at the time of preparation of final grading, landscape, and street improvement plans.

4.12.3 Trip Generation and Distribution

Trip generation represents the amount of traffic that is attracted to and produced by development and is based upon the specific land uses planned for a given project. The trips generated by the Project's proposed land uses have been estimated based on trip generation rates collected by the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition, 2021, for the following land uses: high cube fulfillment center warehouse, strip retail plaza, high turnover (sit-down restaurant), fast-food restaurant without drive-through window, and fast-food restaurant with drive-through window. Passenger car equivalent (PCE) factors were applied to the trip generation rates for heavy trucks (i.e., large 2-axles, 3-axles, 4 or more 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. The PCE factors are consistent with the recommended PCE factors in County of Riverside's Guidelines. The potential for Project trips to be reduced using public transit, walking, or bicycling have not been included as part of the Project's estimated trip generation.

The Project's traffic projections are "conservative" in that these alternative travel modes would reduce the forecasted traffic volumes. Trip generation rates for the proposed uses are shown in Table 4.12-1, *Project Trip Generation Rates*. Trip generation summary for the Project in actual vehicles is shown in Table 4.12-2, *Project Trip Generation Summary*. Additional information regarding the breakdown of trips by vehicle mix is provided in the Traffic Analysis (Urban Crossroads 2022) included in Appendix S of this EIR. Based on the trip generation rates for the identified land uses, the proposed Project is projected to generate 9,266 two-way trip-ends per day in actual vehicles, with 1,035 actual AM peak hour trips and 723 actual PM peak hour trips.

As the Project is proposed to include retail and restaurant uses, pass-by percentages have been obtained from the 2021 ITE Trip Generation Manual. Pass-by trips are associated with existing traffic on the roadway network that might visit a use on-site on their way to their primary destination. Internal capture is a percentage reduction that can be applied to the trip generation estimates for individual land uses to account for trips internal to the site. In other words, trips may be made between individual retail and restaurant uses on-site and can be made either by walking or using internal roadways without using external streets. An internal capture reduction was applied to recognize the interactions that would occur between the various complementary land uses proposed as part of the Project.

Table 4.12-1
PROJECT TRIP GENERATION RATES

Land Use	Units	ITE LU Code	AM	Peak	Hour	PM	Peak	Hour
			In	Out	Total	In	Out	Total
Actual Vehicle Trip Generation Rates	TSF	--	0.089	0.033	0.212	0.050	0.165	2.129
High-Cube Fulfillment Center Warehouse								
Passenger Cars (AM = 84.4%, PM = 87.3%, Daily = 82.2%)	--	--	0.079	0.024	0.103	0.040	0.144	1.750
2-4 Axle Trucks (AM = 6.6%, PM = 6.7%, Daily = 7.6%)	--	--	0.004	0.004	0.008	0.005	0.011	0.162
5+-Axle Trucks (AM = 9.0%, PM = 6.0%, Daily = 10.2%)		--	0.005	0.006	0.011	0.005	0.010	0.217
Strip Retail Plaza (<40,000 SF)	TSF	822	1.42	0.94	2.36	3.30	6.59	54.45
High Turnover (Sit-Down) Restaurant	TSF	932	5.26	4.31	9.57	5.52	9.05	107.20

Land Use	Units	ITE LU Code	AM	Peak	Hour	PM	Peak	Hour
			In	Out	Total	In	Out	Total
Fast Food w/o Drive Thru	TSF	933	25.04	18.14	43.18	16.61	33.21	450.49
Fast Food w/ Drive Thru	TSF	934	22.75	21.86	44.61	17.18	33.03	467.48
Passenger Car Equivalent (PCE) Trip Generation Rates	TSF	--	0.089	0.033	0.122	0.050	0.165	2.129
High-Cube Fulfillment Center Warehouse								
Passenger Card	--	--	0.079	0.024	0.103	0.040	0.144	1.175
2-4 Axle Trucks (PCE = 2.0)	--	--	0.008	0.008	0.016	0.010	0.022	0.324
5+-Axle Trucks (PCE = 3.0)	--	--	0.016	0.017	0.033	0.014	0.030	0.651

Source: Urban Crossroads 2022

¹ Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

² TSF = thousand square feet

³ Vehicle Mix Source: High Cube Warehouse Trip Generation Study, WSP, January 29, 2019. Inbound and outbound split source: ITE Trip Generation Manual, Eleventh Edition (2021) for ITE Land Use Code 154.

⁴ PCE factors: 2 and 3-axle = 2.0; 4+-axle = 3.0.

Table 4.12-2
PROJECT TRIP GENERATION SUMMARY

Land Use	Quantity	Units ¹	AM	Peak	Hour	PM	Peak	Hour	Daily
			In	Out	Total	In	Out	Total	
Actual Vehicles:	774.419	TSF							
High-Cube Fulfillment									
Passenger Cars:			61	18	79	31	80	111	1,356
2-4 Axle Trucks:			3	3	6	4	5	9	126
5+-Axle Trucks:			4	4	8	4	4	8	168
Total Truck Trips (Actual Vehicles):			7	7	14	8	9	17	294
Total Industrial Trips (Actual Vehicles):			68	25	93	39	89	128	1,650
Strip Retail	30.825	TSF	44	29	73	102	101	203	1,678
Internal Capture (NCHRP 684)			-4	-4	-8	-51	-29	-80	-662
Pass-by Reduction (PM/Daily=40%)			0	0	0	-20	-20	-41	-408
High-Turnover (Sit-Down) Restaurant	5.000	TSF	26	22	48	28	18	46	536
Internal Capture (NCHRP 684)			0	0	0	-1	-2	-3	-24
Pass-By Reduction (PM/Daily=43%)			0	0	0	-12	-12	-23	-222
Fast Food Without Drive-Thru	23.775	TSF	595	431	1,027	395	395	790	10,710
Internal Capture (NCHRP 684)			-3	-3	-6	-19	-34	-53	-440
Pass-By Reduction (AM=50%; PM/Daily=55%)			-214	-214	-428	-199	-199	-398	-5,650
Fast-Food Drive-Thru	10,400	TSF	237	227	464	179	165	344	4,862
Internal Capture (NCHRP 684)			-1	-1	-2	-9	-15	-24	-198
Pass-By Reduction (AM=50%; PM/Daily=55%)			-113	-113	-226	-83	-83	-166	-2,566
Total Retail Trips			567	374	942	310	285	595	7,616

Land Use	Quantity	Units ¹	AM	Peak	Hour	PM	Peak	Hour	Daily
			In	Out	Total	In	Out	Total	
Industrial Cars			61	18	79	31	80	111	1,356
Retail Cars			567	374	942	310	285	595	7,616
Industrial Trucks (Actual Vehicles)			7	7	14	8	9	17	294
Total Project Trips (Actual Vehicles)			634	399	1,035	349	374	723	9,266
Passenger Car Equivalent (PCE): ² High-Cube Fulfillment	774.419	TSF							
Passenger Cars:			61	18	79	31	80	111	1,356
2-4 axle Trucks (PCR=2.0)			6	6	12	8	9	17	252
5+-axle Trucks (PCE=3.0)			13	13	26	11	12	23	504
Total Truck Trips (PCE)			19	19	38	19	21	40	756
Total Industrial Trips (PCE)			80	37	117	50	101	151	2,112
Industrial Cars			61	18	79	31	80	111	1,356
Retail Cars			567	374	942	310	285	595	7,616
Industrial Trucks (PCE)			19	19	38	19	21	40	756
Total Project Trips (PCE)			647	411	1,059	360	386	746	9,728

Source: Urban Crossroads 2022

¹ TSF = thousand square feet

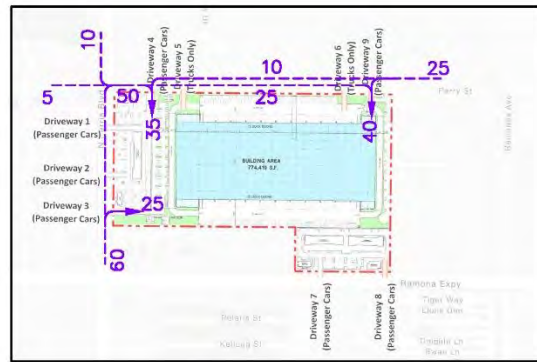
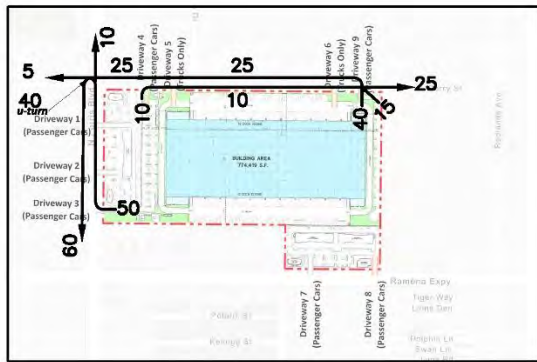
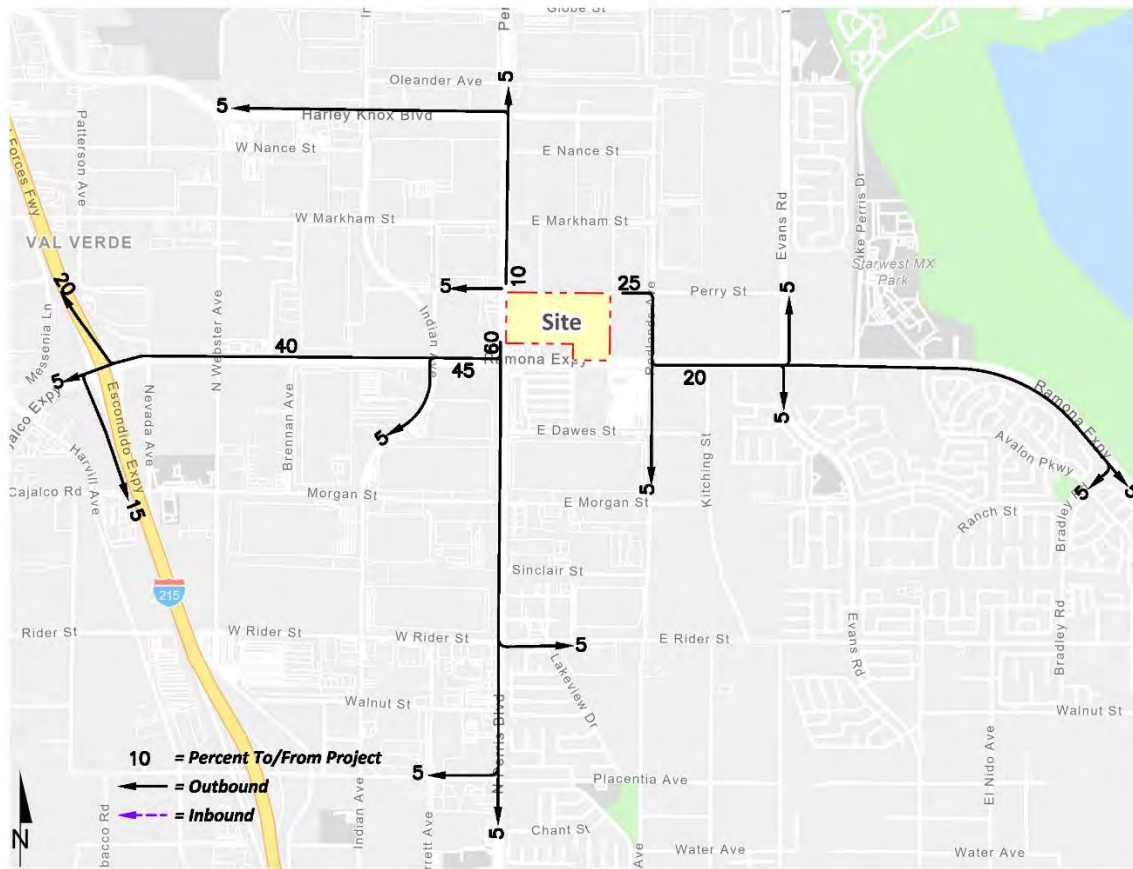
² Total Trips = Passenger Cars + Truck Trips

The Project trip distribution and assignment process represents the directional orientation of traffic to and from the Project site. The trip distribution pattern is heavily influenced by the geographical location of the site, the location of surrounding uses, and the proximity to the regional freeway system. Passenger car distribution patterns are based on existing and planned land uses and roadway infrastructure in the area. Truck distribution patterns are based on City truck routes, proximity to the freeway system, and the Project Applicant's input on percentage of traffic oriented to the Port of Long Beach or other destination. As such, Project truck traffic is anticipated to access Perry Street then to Redlands Avenue to head northbound to the Harley Knox Boulevard interchange (note Ramona Expressway and Perris Boulevard are not designated truck routes within the City). The industrial passenger car and truck trip distributions are illustrated on **Figure 4.12-7, Project (Industrial Passenger Car) Trip Distribution**, and **Figure 4.12-8, Project (Industrial Truck) Trip Distribution**, respectively. The retail trip distribution is illustrated on **Figure 4.12-9, Project (Retail) Trip Distribution**.

4.12.4 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a significant impact associated with transportation would occur if implementation of the proposed Project would:

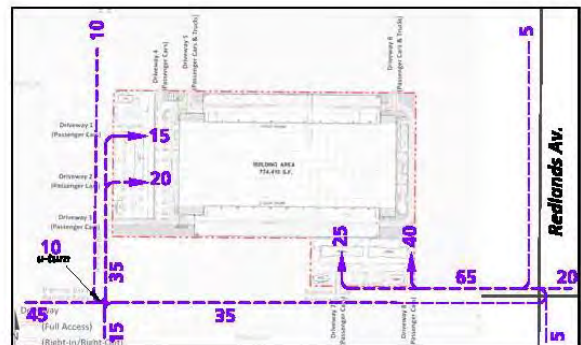
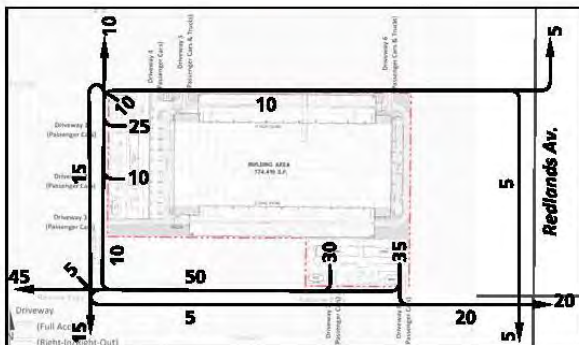
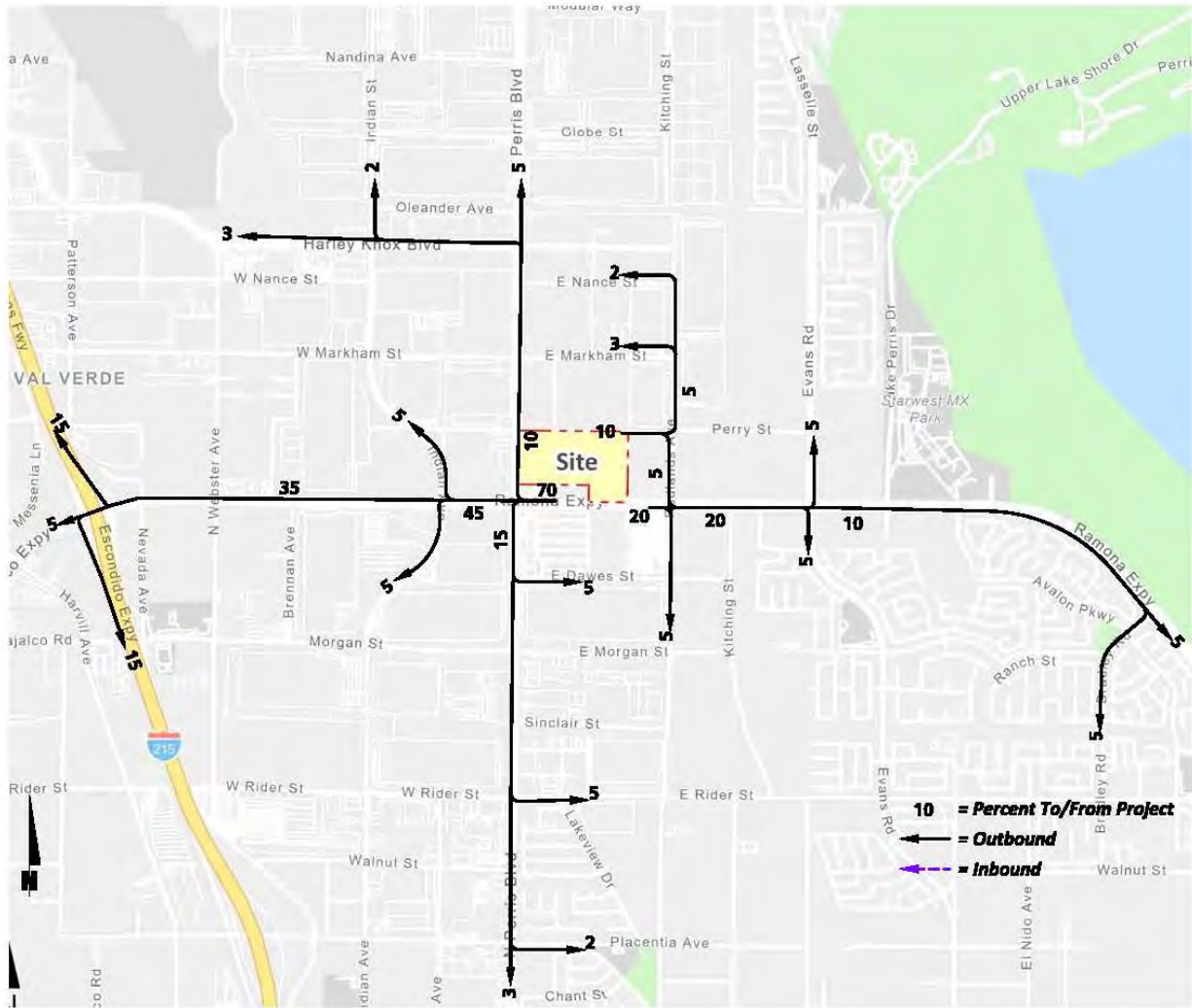
- Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- Result in inadequate emergency access.



Source: Urban Crossroads 2023



Source: Urban Crossroads 2022



Source: Urban Crossroads 2022

4.12.5 Environmental 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?

Impact Analysis

SCAG Connect SoCal

SCAG's Connect SoCal seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. Table 4.10-1, in Section 4.10, *Land Use and Planning*, of this EIR, addresses the Project's consistency with Connect SoCal. As demonstrated through the analysis contained in Table 4.10-1, implementation of the Project would not conflict with the goals and policies of SCAG's regional planning program, including the goals related to vehicular and non-vehicular circulation, and goods movement.

City of Perris General Plan

As presented in Section 4.10, *Land Use and Planning*, and discussed in Table 4.10-2 of this EIR, the Project does not conflict with policies of the City of Perris General Plan, including policies of the Circulation Element that address the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

PVCCSP

As identified previously, the PVCCSP includes various Standards and Guidelines for the provision of onsite and off-roadway improvements, vehicular and non-vehicular circulation, and site access. As discussed through the analysis presented in this section, the Project would be developed in accordance with the PVCCSP Standard and Guidelines.

Regarding required mitigation measures from the PVCCSP EIR, the Project would comply with the required mitigation. A project-specific transportation analysis has been conducted for the Project, as required by PVCCSP EIR mitigation measure MM Trans 7, and the Project-specific Traffic Analysis is the basis for transportation impacts analyzed in this EIR section. As required by PVCCSP EIR mitigation measure MM Trans 1, the site-adjacent roadway and site access improvements needed to accommodate site access and maintain acceptable peak hour operations for the Project that were recommended in the Traffic Analysis have been incorporated into the Project. Additionally, as required by PVCCSP EIR mitigation measure MM Trans 2 and discussed in Project Design Features above, sight distance at each Project access point would be reviewed with respect to standard California Department of Transportation and City of Perris sight distance standards at the time of preparation of final grading, landscape, and street improvement plans. The Project would participate in the phased construction of off-site traffic signals and other off-site improvements through the payment of traffic signal mitigation fees and through payment of fair share mitigation fees which include TUMF, DIF, and the NPRBBD, consistent with the requirements of PVCCSP EIR mitigation measures MM Trans 3 and MM Trans 8.

Pursuant to PVCCSP EIR mitigation measure MM Trans 4, RTA was contacted to determine if future provision of bus routing in the Project area would require bus stops at the Project access points. Mauricio Alvarez of the RTA reviewed the plans for both the industrial warehouse along Perris Blvd and the commercial project along Ramona Expressway. He stated in an email that there are no

recommendations to submit at this time. He further communicated that RTA has a couple of active bus stops at the intersection of Perris Blvd and Ramona Expressway. As development increases in this area, it is imperative that there is access to these stops for customers to utilize. There is existing sidewalk along Perris Boulevard and Perry Street for those at the industrial warehouse to connect to transit, which is important. For the commercial portions of the Project, enhanced concrete paving would be incorporated along the frontage, on Ramona Expressway, which would connect to the existing sidewalk and create a safe pathway for people to utilize transit (Alvarez 2023).

The Project would include the provision of bike racks, consistent with PVCCSP EIR mitigation measure MM Trans 5. As demonstrated, the Project would be consistent with the mitigation required in the PVCCSP.

Active Transportation Plan

As discussed above, the ATP includes a recommended Buffered Bike Lane (Class IIB) along Perris Boulevard, adjacent to the west of the Project site, and a recommended Separated Bikeway (Class IV) along Ramona Expressway, adjacent to the south of the Project site. Although these improvements are not included as part of the Project, the Project would not preclude the future development of the ATP recommended bikeways. Trucks associated with the proposed warehouse use would access the warehouse facility only from Perry Street via Redlands Avenue, a PVCCSP-designated truck route, to Harley-Knox Boulevard to travel to and from I-215. No warehouse truck traffic would be permitted along Perris Boulevard or Ramona Expressway, and thus, Project truck traffic would not interfere with future bikeways recommended along Perris Boulevard or Ramona Expressway. Two full-access designated driveways for trucks would be provided on Perry Street. Directional signage would be provided onsite to direct drivers accordingly. The proposed truck routes were analyzed in the Traffic Analysis prepared by Urban Crossroads (Appendix S). As required by PVCCSP EIR mitigation measure MM Trans 5, the Project would provide bicycle parking on site in compliance with City of Perris standards.

In summary, the Project would not conflict with regional or local programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact would be less than significant.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold b: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact Analysis

The City of Perris adopted the Transportation Impact Analysis Guidelines for CEQA in May 2020, which include VMT thresholds. The VMT Scoping Form for Land Use Projects (Appendix 1.1 of Appendix S), provided by the City of Perris, has been completed and reviewed for accuracy. Section 15064.3 of the State CEQA Guidelines, upon which the Traffic Impact Analysis Guidelines is based, recommends the use

of VMT as the primary metric for the evaluation of transportation impacts, under CEQA, associated with land use and transportation projects. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. All agencies and projects State-wide are required to utilize the updated CEQA guidelines recommending the use of VMT for evaluating transportation impacts as of July 1, 2020.

The updated State CEQA Guidelines allow for lead agency discretion in establishing methodologies and thresholds provided there is substantial evidence to demonstrate that the established procedures promote the intended goals of the legislation. Where quantitative models or methods are unavailable, Section 15064.3 allows agencies to assess VMT qualitatively using factors such as availability of transit and proximity to other destinations. The OPR Technical Advisory on Evaluating Transportation Impacts in CEQA (State of California, December 2018) ["OPR Technical Advisory"] provides technical considerations regarding methodologies and thresholds with a focus on office, residential, and retail developments as these projects tend to have the greatest influence on VMT. The proposed Project's VMT impact has been assessed in accordance with guidance from the City of Perris Transportation Impact Analysis Guidelines for CEQA. The transportation guidelines provide a framework for "screening thresholds" for when a project is expected to cause a less than significant impact without conducting a detailed VMT study. The Project requirements for evaluation of transportation impacts under CEQA was assessed using the City of Perris VMT Scoping Form for Land Use Projects as appended to the City of Perris Traffic Impact Analysis Guidelines (City of Perris 2020b). The criteria for a project resulting in a less than significant VMT impact is as follows:

- Is the project 100% affordable housing?
- Is the project within ½ mile of qualifying transit?
- Is the project a local serving land use?
- Is the project in a low VMT area?
- Are the project's Net Daily Trips less than 500 ADT?

The Project site is located within ½ mile of qualifying transit. State CEQA Guideline Section 15064.3, subdivision (b)(1), states that lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within one half (½) mile of an existing major transit stop or an existing stop along a high-quality transit corridor will have a less than significant impact on VMT.

Regarding the low VMT area screening criteria, the Project site is location within Traffic Analysis Zone (TAZ) 3821, which has a VMT rate of 13.39 VMT per capita, and 11.26 VMT per employee. The VMT rate within the Project TAZ is lower than the Citywide average VMT per capita and per employee, as demonstrated in Table 4.12-3, *Low VMT Area Screening*.

**Table 4.12-3
LOW VMT AREA SCREENING**

VMT Rate Type	Citywide VMT Averages	VMT Rate for Project TAZ 3821
VMT/Capita	15.05	13.39
VMT/Employee	11.62	11.26

Source: Urban Crossroads 2022

The Project meets two of the screening criteria identified in the Perris Traffic Impact Analysis Guidelines: being with one-half a mile of qualifying transit and being located within a low VMT area. Therefore, since the Project meets two of the screening criteria identified in the City of Perris Traffic Impact Analysis Guidelines and as discussed in more detail above, a VMT study is not required for the Project and Project impacts related to VMT would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 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)?

Impact Analysis

The analysis contained in the PVCCSP EIR concludes that implementation of the PVCCSP and the subsequent implementation of development and infrastructure projects would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

While the Project proposes an amendment to the PVCCSP to change the existing commercial land use and zoning designations for the warehouse portion of the Project site to Light Industrial, the Project is in a developing area, consisting of warehouse and commercial uses. Directly adjacent land uses to the north and east of the Project site consist of warehouse uses, as well as land to the west of the Project site, beyond Perris Boulevard and adjacent commercial uses, and land southwest of the Project site. So, although the Project would require a land use and zoning change, the introduction of a warehouse use into this location would not introduce an incompatible use. The area includes many warehouses, including adjacent parcels, and the proposed warehouse would not be incompatible with surrounding commercial and industrial/warehouse uses.

During Project construction, vehicular traffic would travel to and from the Project site for construction worker transportation and delivery of construction equipment and materials. Traffic associated with construction uses would be substantially less than daily and peak hour traffic volumes generated during Project operational activities, as construction trips typically occur outside of peak construction hours. Daily construction worker traffic would not increase traffic-related hazards. Additionally, delivery of materials and equipment would not occur on a daily basis but would occur periodically throughout the construction phase of the Project. Trucks delivering construction equipment and materials would follow designated truck routes and would not increase traffic-related hazards during construction. Two full-access designated driveways for trucks would be provided on Perry Street. Directional signage would be provided onsite to direct drivers accordingly. The proposed truck routes were analyzed in the Traffic Analysis prepared by Urban Crossroads (Appendix S). PVCCSP EIR mitigation measure MM Air-2 in Section 4.2, *Air Quality*, of this EIR, requires that a traffic control plan be provided to the City. The traffic control plan would describe in detail safe detours and provide temporary traffic control during construction activities for the Project to minimize congestion and disruption. To reduce traffic

congestion, the plan would include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a 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.

The Project includes the construction of roadways and site access improvements. The Project would develop new access points for the Project site. The proposed access points for the Project site are as follows:

- Driveway 1 on Perris Boulevard – passenger cars only with right-in/right-out only for future commercial component
- Driveway 2 on Perris Boulevard – passenger cars only with right-in/right-out only for future commercial component
- Driveway 3 on Perris Boulevard – passenger cars only with right-in/right-out only for warehouse component
- Driveway 4 on Perry Street – passenger cars only with right-in/right-out/left-in access only for warehouse component
- Driveway 5 on Perry Street – trucks only with right-out/left-in access only (directing all trucks to and from Redlands Avenue to the east) for warehouse component
- Driveway 6 on Perry Street – trucks only with right-out/left-in access only (directing all trucks to and from Redlands Avenue to the east) for warehouse component
- Driveway 7 on Ramona Expressway – passenger cars only with right-in/right-out only for commercial component
- Driveway 8 on Ramona Expressway – passenger cars only with full access (shared access with adjacent property) for future commercial component
- Driveway 9 on Perry Street – passenger cars only with full access for warehouse component

Roadway and circulation improvements have been designed in compliance with PVCCSP Standards and Guidelines, including those contained in Chapter 4.0, *On-Site Design Standards and Guidelines*, and Chapter 5.0, *Off-Site Design Standards and Guidelines*. Additionally, PVCCSP EIR mitigation measures MM Trans 1 and MM Trans 2 require the construction of circulation improvements as required by the PVCCSP Circulation Plan and adequate site distance at Project entrance roadway, respectively, for development projects within the PVCCSP. The proposed driveways are consistent with the driveway spacing requirements set forth in the PVCCSP. Additionally, due to the typical wide turning radius of large trucks (a 53-foot trailer was utilized for the analysis), an analysis was conducted to determine appropriate curb radii and to verify Project trucks would have sufficient space to execute turning maneuvers. Based on this analysis (contained in the Project Traffic Analysis), Driveways 5 and 6 on Perry Street, which are the only Project driveways proposed for truck access, are anticipated to accommodate the wide turning radius of heavy trucks as designed.

As required by PVCCSP EIR mitigation measure MM Trans 2 and discussed in Project Design Features above, sight distance at each Project access point would be reviewed with respect to standard Caltrans and City of Perris sight distance standards at the time of preparation of final grading, landscape, and street improvement plans. The City would be responsible for review and approval of final plans, and the plan process would ensure that adequate site distance is provided. To further reduce the potential hazards to pedestrians and bicycles, including those along Ramona Expressway Regional trail, the Project limits truck access to two driveways, located on Perry Street, and on-site truck activity areas are separated from the passenger vehicle areas to ensure that there would be no conflict between trucks and pedestrians at the Project site.

Adherence to applicable City requirements, PVCCSP Standards and Guidelines, PVCCSP EIR mitigation measures, and Project Design Features would ensure the Project would not include substantially increase hazards due to design feature or incompatible uses. Impacts would be less than significant.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold d: Would the project result in inadequate emergency access?

Impact Analysis

The proposed Project would not result in inadequate emergency access. As discussed above, access to the site will be provided via driveways on Perris Boulevard, Perry Street, and Ramona Expressway. The driveways are of standard size to accommodate passenger cars, with two of the three proposed driveways on Perry Street sized to accommodate trucks. All access features are subject to the City of Perris design requirements, including the Fire Department's requirement of a minimum 20-foot width for driveways. Because of this, emergency vehicles would be able to access the Project site, and the Project would not result in inadequate emergency access. No impact would occur.

Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

No impact would occur.

4.12.6 Cumulative Impacts

Future development projects would be reviewed for consistency with adopted programs, plans, ordinances, or policies, including but not limited to the SCAG RTP/SCS, Perris General Plan, and the PVCCSP, as applicable. Even if future public and private development projects are in conflict, the Project would not contribute to a cumulative impact because the Project does not conflict with a program, plan, ordinance, or policy addressing the circulation system.

The Project screens out of VMT analysis based on being within a half-mile of qualifying transit and being located within a low VMT impact area. Each cumulative project would be required to follow the City's Transportation Impact Analysis Guidelines for CEQA and OPR's Technical Advisory to determine if a VMT analysis is required. If a VMT analysis is required, the project would be required to follow the City's Guidelines and OPR's Technical Advisory to analyze the project's VMT. Based on the Project screening out of VMT analysis, the Project would not contribute to a cumulatively considerable VMT impact.

Regarding increased hazards due to geometric design features or incompatible uses, similar to the Project, future public and private development projects in the vicinity of the Project site would be required to construct roadways and access driveways in accordance with applicable PVCCSP Standards and Guidelines to ensure impacts are less than significant. Further, providing sufficient emergency access during construction and operation is also a standard requirement. The Project would not result in a cumulatively considerable contribution to a significant cumulative impact associated with traffic-related hazards or emergency access. For the reasons set forth above, the proposed Project's incremental contribution to cumulative transportation impacts would be less than significant.

4.12.7 References

- Albert A. Webb Associates. 2011. Perris Valley Commerce Center Specific Plan Final Environmental Impact. City of Perris. Report. November 2011, certified January 10, 2012.
- Alvarez, Mauricio. 2023. Email from Mauricio Alvarez on February 14, 2023. Included as Appendix U.
- City of Perris. 2022. Perris Valley Commerce Center Amendment No. 12 Specific Plan. February 2022. Adopted January 10, 2012, and subsequently amended and approved January 11, 2022.
- 2020a. Active Transportation Plan. December 8.
- 2020b. Transportation Impact Analysis Guidelines for CEQA. May 12.
- Southern California Association of Governments (SCAG). 2020. Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. September 3.
2018. Industrial Warehousing in the SCAG Region. April.
- State of California Governor's Office of Planning and Research. 2018. Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA. December.
- Urban Crossroads. 2022. Transportation Analysis for OLC3 (DPR22-00006, TPM22-05048, SPA22-05047). October 14, 2022.

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4.13 TRIBAL CULTURAL RESOURCES

This section identifies the potential for the Project area and adjacent off-site improvement areas (collectively referred to herein as the “Project area”) to contain tribal cultural resources and evaluates the Project’s potential to cause a substantial adverse change in the significance of tribal cultural resources.

The following references were used in the preparation of this section of the DEIR:

- Optimus Building Corp. Phase I Cultural Resources Assessment, June 2022
- City of Perris, *Perris Comprehensive General Plan 2030- Conservation Element*, adopted July 12, 2005.

There was one comment received on the 2023 NOP from the Native American Heritage Commission (NAHC) regarding tribal cultural resources. Specially, the NAHC requested that consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project be conducted as early as possible to avoid inadvertent discoveries. The NAHC also requests the proposed Project comply with AB 52 and SB 18. Tribal Cultural Resources and associated input received from Native American tribes during the EIR scoping process, as well as during AB 52 consultation, is discussed in Section 4.13.4. There were no comments addressing cultural resources raised at the July 20,2022 Draft EIR public scoping meeting.

4.13.1 Existing Setting

Section 4.4, *Cultural Resources*, of this Draft EIR summarizes Project-specific existing setting information presented in the technical report prepared for this Project based on the research and field surveys conducted. Following is a summary of information provided in the Project-specific technical report relevant to tribal cultural resources. A more detailed account can be found in Appendix H, Phase I Cultural Resources Assessment conducted by Jean A. Keller, PH.D. for Optimus Building Corp.

4.13.1.1 Prehistoric Setting

Based on currently available archaeological research, occupation of Southern California by human populations is believed to have begun at least 10,000 years ago. In general, the earliest established cultural tradition in Southern California is accepted to be the San Dieguito Tradition. The San Dieguito people were nomadic large-game hunters whose tool assemblage included large-domed scrapers, leaf-shaped knives, and projectile points/hammerstones.

Throughout southwestern California the La Jolla Complex followed the San Dieguito Tradition. The La Jolla Complex, as first described by Rogers (1939, 1945), then redefined by Harding (1951), 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 projectile points.

The late period is represented by the San Luis Rey Complex, divided into two periods. The San Luis Rey I type component includes cremations, bedrock mortars, millingstones, projectile points, bone awls, stone pendants, quartz crystals, and shell beads. 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 such as metal knives and glass beads. Inferred San Luis Rey subsistence activities include hunting and gathering with an emphasis on acorn harvesting.

4.13.1.2 Ethnographic Setting

Available ethnographic research indicates that the study area was included in the known territory of the Luiseño Indians during both prehistoric and historic times. 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. Temporary campsites usually evidenced by lithic debris and/or milling features may be expected to occur relatively frequently. Food processing stations, often single milling features, are the most abundant type of site found. Isolated artifacts occur with almost the same frequency as food processing stations. The most infrequently occurring archaeological site is the village site. Sites of this type are usually large, in defensive locations amidst abundant natural resources, and usually surrounded by the types of sites previously discussed, which reflect the daily activity of the villager.

4.13.1.3 Tribal Cultural Resources

As further discussed in Section 4.4, *Cultural Resources*, of this DEIR, a records search was conducted at the Eastern Information Center (EIC) located at the University of California, Riverside on October 20, 2021. The EIC is the State of California's official cultural resource records repository for the County of Riverside. The objective of this records search was to determine whether any prehistoric or historical resources had been recorded previously within an area encompassing a one-mile radius around the proposed Project site. Based on the results of the records search, the Project site had been included in three previous cultural resource studies. No archaeological sites of Native-American origin were recorded within the property boundaries during this study, and no tribal cultural resources were located within the project area.

During preparation of the Cultural Resources Assessment, and as further discussed under Threshold(A)(II) below, various Native American tribes were contacted regarding the Project and a records search was requested of the Sacred Lands Files (SLFs) from the NAHC.

Based on the provided USGS quadrangle information, the search had negative results. At this time, a response to the seventeen (17) project scoping letters sent to tribes interested in the Perris area has only been received from the Rincon Band of Luiseño Indians Cultural Resources Department. Their letter, received January 27, 2022, stated that the subject property is within the Traditional Use Area of the Luiseño Indians and is also within the Tribe's specific area of historic interest. As such, the Rincon Band is traditionally and culturally affiliated with the project area. After a review of the provided documents and their internal documents, they determined that Tribal Cultural Resources (TCRs) and/or Traditional Cultural Properties (TCPs) have been recorded within or surrounding the project area. Therefore, the Band recommended that an archaeological records search be conducted and asked that a copy of the records search be contained in the Phase I study, which will be provided to the Rincon Band of Luiseño Indians as part of the AB 52 process.

Further, the City as lead agency sent notification of the Project to 11 tribal representatives on April 13, 2022. The only tribe to respond was the Agua Caliente Band of Cahuilla Indians on May 13, 2022. The

tribe noted that the Project area is within the Tribe's Traditional Use Area and requests the cultural resources inventory of the Project area by a qualified archaeologist, a copy of the records search, and a copy of any cultural resource documentation generated in connected with the project be sent to the Tribe. No further consultation from the Aqua Caliente Band of Cahuilla Indians, or other Native American tribes, was requested during the consultation period.

A pedestrian survey of the project site was performed by Dr. Jean Keller on November 20, 2021, but did not reveal any prehistoric/Native American cultural resources. Upon completion of the field evaluation, an updated DPR form was compiled for submittal to the EIC and can be found in Appendix H, Phase I Cultural Resources Assessment.

4.13.2 Existing Policies and Regulations

As previously discussed, Section 4.4, *Cultural Resources*, of this DEIR provides a complete discussion of the regulatory framework for the analysis of cultural resources, including regulations relevant to the analysis of tribal cultural resources. The following discussion addresses regulatory information particularly relevant to tribal cultural resources.

4.13.2.1 State Regulations

California Environmental Quality Act

CEQA requires the lead agency to determine whether the proposed development project will have a significant effect on the environment. Public Resources Code Sections 21083.2 and 21084.1 deal with the definitions of unique and non-unique archaeological resources and historical resources, respectively. Section 21083.2 directs the lead agency to determine whether the project may have a significant effect on unique archaeological resources. If the lead agency determines that the project may have a significant effect on unique archaeological resources, the environmental impact report shall address the issue of those resources. Section 21084.1 directs the lead agency to determine whether the project may have a significant effect on historical resources, irrespective of the fact that these historical resources may not be listed or determined to be eligible for listing in the California Register of Historical Resources (CRHR), a local register of historical resources, or they are not deemed significant pursuant to criteria set forth in Public Resource Code Section 5024.1(g).

Unique Archaeological Resources Criteria

CEQA requires the lead agency to consider whether a project will have a significant effect on unique archaeological resources and to avoid unique archaeological resources when feasible or mitigate any effects to less-than-significant levels per Public Resources Code Section 21083.2. Section 20183.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.

3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Human Remains

According to State CEQA Guidelines Section 15064.5, all human remains and specific procedures are to be used when Native American remains are discovered. These procedures are discussed within Public Resources Code Section 5097.

California Health and Safety Code (Sections 7050.5, 7051, and 7054)

California Health and Safety Code Sections 7050.5, 7051, and 7054 collectively address the illegality of interference with human burial remains (except as allowed under applicable sections of the Public Resources Code), as well as the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the Native American Heritage Commission (NAHC) to resolve disputes regarding the disposition of such remains. It has been incorporated into State CEQA Guidelines Section 15064.5(e).

Senate Bill 18, California Tribal Consultation Guidelines

The State of California Governor's Office of Planning and Research developed these guidelines to provide guidance to cities and counties on the process for consulting with Native American tribes during the adoption or amendment of local general plans or specific plans (defined in Government Code Sections 65450 et seq.). Senate Bill 18 (SB 18) requires local agencies to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process, thereby providing tribes an opportunity to participate in local land use decisions at an early planning stage.

Assembly Bill 52, Impacts to Tribal Cultural Resources

AB 52, which became effective on July 1, 2015, adds a new requirement to CEQA regarding tribal cultural resources. Public Resources Code Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, Public Resources Code Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of the proposed project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: (1) prescribed notification and response timelines; (2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and (3) documentation of all consultation efforts to support CEQA findings. Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. Public Resources Code Section 21074 provides a definition of "tribal cultural resources." In brief, to be considered a tribal cultural resource, or TCR, a resource must be either (1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources; or (2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources

or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

4.13.2.2 Local

City of Perris General Plan Conservation Element

The following supporting measures are included in the City of Perris General Plan Conservation Element would be applicable to the 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.

City of Perris Historic Points of Interest

The Perris Valley Historical Association and the Riverside County Office of Historic Preservation have identified historic sites and structures within the City of Perris. All these structures exist in the Downtown area and are not located in the vicinity of the proposed Project site. The Santa Fe Depot was listed in 1994 on the National Register of Historic Places (NRHP) and is currently home to the Perris Valley Historical Museum. The Southern Hotel is listed in the CRHR.

4.13.2.3 Applicable PVCCSP Standards, Guidelines, and Mitigation Measures

There are no Standards and Guidelines included in the PVCCSP related to tribal cultural resources. The following mitigation measures from the PVCCSP EIR are applicable to tribal cultural resources.

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 archeologist¹ 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 shall also 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 and discovered 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 years prior to the submittal of the application for the subject implementing development project or the start of construction of an implementing infrastructure project.

MM Cultural 2

If the Phase 1 Cultural Resources Study required under MM Cultural 1 determines that monitoring during construction by a professional archaeologist is needed for the implementing development project; the project proponent shall retain a professional archaeologist prior to the issuance of grading permits. The task of the archaeologist shall be to verify implementation of the mitigation measures identified in the approved Phase I Cultural Resources Study and to monitor the initial ground-altering activities at the subject site for the unearthing of previously unknown archaeological and/or cultural resources. Selection of the archaeologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the site until the archaeologist has been approved by the City.

The archaeological monitor shall be responsible for maintaining daily field notes, a photographic record, and reporting all finds in a timely manner. The archaeologist shall also be equipped to record and salvage cultural resources that may be unearthed during initial ground-altering activities. The archaeologist shall be empowered to temporarily halt or divert construction equipment to allow recording and removal of the unearthed resources.

If cultural resources are discovered at the development site, the handling of the discovered resources will differ. However, it is understood that all artifacts except for human remains and related grave goods or sacred objects belong to the property owner. All artifacts discovered at the development site shall be inventoried and analyzed by the professional archaeologist. If any artifacts of Native American origin are discovered, all activities in the immediate vicinity of the find shall stop, the project developer and project archaeologist shall notify the City of Perris Planning Division, the Pechanga Band of Luiseño Indians and the Soboba Band of Mission Indians, and a Native American observer of Luiseño descent shall be retained to help analyze the Native American artifacts for identification as everyday life and/or religious or sacred items, cultural affiliation, temporal placement, and function, as deemed possible. 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 tribes. All items found in association with Native American human remains will be considered grave goods or sacred in origin and subject to special handling (see MM Cultural 6, below). Native American artifacts that cannot be avoided or relocated at the project site will be prepared in a manner for curation and the archaeological consultant will deliver the materials to an accredited curation facility approved by the City of Perris within a reasonable amount of time.

Non-Native American artifacts will be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. After analysis and reporting, these artifacts will be subjected to curation or returned to the property owner, as deemed appropriate. Once ground-altering activities have ceased or the professional archaeologist determines that monitoring activities are no longer necessary, monitoring activities may be discontinued following notification to the City of Perris Planning Division.

A report of findings, including an itemized inventory of recovered artifacts, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered artifacts. The report and inventory, when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to archaeological and/or cultural resources. A copy of the report shall also be filed with the Eastern Information Center (EIC).

MM Cultural 3

If the Phase I Cultural Resources Study required under MM Cultural 1 determines that monitoring during construction by both a professional archaeologist and a Native American representative is needed for the implementing development project, the project proponent shall retain a professional archaeologist and a Native American representative of Luiseño descent prior to the issuance of grading

permits. The professional archaeologist and Native American observer shall be required on site during

all initial ground-altering activities. The Native American observer shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow the evaluation of cultural resources with the project archaeologist. The evaluation and treatment provisions of mitigation measure MM Cultural 2 shall apply to this measure.

MM Cultural 4 In the event that cultural resources are discovered at a development site that is not monitored by a professional archaeologist, all activities in the immediate vicinity of the find shall stop, the project developer shall notify the City of Perris Planning Division, and the project developer shall retain a professional archaeologist to analyze the find for identification as prehistoric and historical archaeological resources. The evaluation and treatment provisions of mitigation measure MM Cultural 2 shall apply to this measure.

MM Cultural 6 In the event that human remains (or remains that may be human) are discovered at the implementing development project site during grading or earthmoving, the construction contractors shall immediately stop all activities in the immediate area of the find. The project proponent shall then inform the Riverside County Coroner and the City of Perris Planning Division and the coroner would be permitted to examine the remains.

If the coroner determines that the remains are of Native American origin, the coroner would notify the NAHC and the Commission would identify the “Most Likely Descendent” (MLD)³. Despite the affiliation of any Native American representatives at the site, the Commission’s identification of the MLD would stand. The MLD shall be granted access to inspect the site of the discovery of the 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 their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains would be determined in consultation with the City of Perris, the project proponent, and the MLD. The City of Perris would be responsible for the final decision, based upon input from the various stakeholders.

If the human remains are determined to be other than Native American in origin, but still of archaeological value, the remains would be recovered for analysis and subject to curation or reburial at the expense of the project proponent. If deemed appropriate, the remains would be recovered by the coroner and handled through the Coroner’s Office.

Coordination with the Coroner’s Office would be through the City of Perris and in consultation with the various stakeholders. The specific locations of Native American burials and reburials would be proprietary and not disclosed to the public. The locations would be documented by the consulting archaeologist in conjunction

with the various stakeholders and a report of findings shall be filed with the Eastern Information Center (EIC).

By preparing the Phase 1 Cultural Resources Assessment, the project has complied with PVCCSP EIR mitigation measure MM Cultural 1.

4.13.3 Thresholds of Significance

- a) 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 California Native American tribe, and that is:
 - 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), or
 - 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

4.13.4 Environmental Impacts

Threshold a: 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 California Native American tribe, and that is:

- 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)?*

Impact Analysis

As discussed in Threshold “a” in Section 4.4, *Cultural Resources*, of this DEIR, a records search and literature review of the Project area and surrounding areas was undertaken at the EIC. Results of the records search indicated a total of 51 previously recorded cultural resource studies having been conducted within a one-mile radius of the proposed project. During field surveys for these studies, 14 cultural resource properties have been recorded, one of which involved the subject property. The sole prehistoric (Native American) site, located approximately one-half-mile from DPR 22-00006, is comprised of one metate fragment, one mano, one crescent, 16 flakes, and fire-affected rock. A significant subsurface cultural deposit was not discovered during Phase II Testing conducted for that site in 2012.

If previously unidentified archaeological resources may be discovered during ground disturbance, Project-specific mitigation measure MM CUL-2 requires that an archaeological monitor be present during initial ground disturbing activities and identifies steps that would be taken to ensure potential

impacts to tribal cultural resources are less than significant. Project-specific mitigation measure MM CUL-3 identifies actions to be taken if human remains are found.

Mitigation Measures

Project-Specific MM CUL-2: Prior to the issuance of grading permits, the Project Applicant 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.

If 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, except for human remains and related grave goods or sacred/ceremonial/religious objects, belong to the property owner. The property owner shall 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, the Soboba Band of Luiseño Indians, the Pechanga Band of Luiseño Indians, and the Rincon Band of Luiseño Indians. A designated Native American representative from either the Soboba Band of Luiseño Indians, the Pechanga Band of Luiseño Indians, or the Rincon Band of Luiseño Indians shall be retained to assist the Project archaeologist in the significance determination of the Native American resources as deemed possible. The designated 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 tribe.

If the find is determined to be of sacred or religious value, the tribal representative will work with the City and consulting archaeologist to protect the resource in accordance with tribal requirements. All analysis will be undertaken in a manner that avoids destruction or other adverse impacts.

If human remains are discovered at the Project site or within the off-site Project improvement areas, mitigation measure MM CUL-3 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 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 cannot be avoided or relocated at the Project site shall be prepared for curation at an accredited curation facility in Riverside County that meets federal standards (per 36 CFR Part 79) and available to archaeologists/researchers for further study. The Project archaeologist shall deliver the Native American artifacts, including title, to the identified curation facility within a reasonable amount of time, along with applicable fees for permanent curation. Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. After 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 tribe(s) involved with the Project.

Project-Specific MM CUL-3: If 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(s) shall immediately stop all activities within 100 feet of the find. The Project Applicant 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 of any Luiseño tribal representative(s) at the site, the NAHC identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of the Native American human remains and may recommend to the Project Applicant 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 Applicant and the MLD. If there is disagreement regarding the disposition of the remains, State law will apply and median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

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

Level of Significance After Mitigation

Accordingly, the project would not have impacts on tribal cultural resources; impacts are considered less than significant with Project-specific MM CUL-2 and MM CUL-3.

Threshold a: 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 California Native American tribe, and that is:

- I. 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 will consider the significance of the resource to a California Native American tribe?*

Impact Analysis

AB 52 requires lead agencies to provide notice to Native American tribes that are traditionally and culturally affiliated with the geographic area of a project if they have requested notice of projects proposed within that area.

On April 13, 2022, the City sent out project notice letters to 11 Native American tribes that are traditionally and culturally affiliated with the geographic area of the Project area. The only tribe to respond was the Agua Caliente Band of Cahuilla Indians, on May 13, 2022. The tribe noted that Project area is within the Tribe's Traditional Use Area and requests the cultural resources inventory of the Project area by a qualified archaeologist, a copy of the records search, and a copy of any cultural resource documentation generated in connected with the project be sent to the Tribe. No further consultation from the Aqua Caliente Band of Cahuilla Indians, or other Native American tribes, was requested during consultation period. Although it is not likely, there is a remote possibility that tribal cultural resources may be present beneath the site's subsurface, and if present, could be impacted by deeper ground-disturbing activities associated with Project construction that extend below disturbed soils. Without mitigation, construction activities including excavation could encounter unknown tribal cultural resources resulting in a potentially significant impact. Project-specific mitigation measure MM CUL-2 requires that an archaeological monitor be present during initial ground-disturbing activities and identifies steps that would be taken to ensure potential impacts to tribal cultural resources are less than significant. Project specific mitigation measure MM CUL-3 identifies actions to be taken if human remains are found.

Mitigation Measures

Project specific mitigation measures MM CUL-2 and MM CUL-3 are applicable to this impact.

Level of Significance After Mitigation

With implementation of Project specific mitigation measures MM CUL-2 and MM CUL-3, potential impacts to tribal cultural resources would be less than significant.

4.13.5 Cumulative Impacts

The proposed mitigation measures will ensure that any unknown buried tribal cultural and/or archaeological resources that are discovered during development of the proposed project are protected, evaluated, and recovered as determined by the appropriate qualified expert. With the implementation of Project-specific mitigation measures from Draft EIR Section 4.4 (Cultural Resources), MM CUL-2 and MM CUL-3, impacts to unknown potentially significant tribal cultural resources will be reduced to a less than significant level with mitigation.

4.13.6 References

City of Perris. Perris Valley Commerce Center Specific Plan Amendment No. 12, Adopted January 10, 2012, and subsequently amended and approved January 11, 2022. Available at: <https://www.cityofperris.org/home/showpublisheddocument/2647/637799977032200000>. Accessed April 20, 2022.

Perris Valley Commerce Center Specific Plan Final Environmental Impact Report, State Clearing house # 2009081086 November 2011, certified January 10, 2012. Available at City of Perris and at: <https://www.cityofperris.org/home/showpublisheddocument/13874/637455522381730000>. Accessed April 20, 2022.

Perris Comprehensive General Plan 2030- Conservation Element, adopted July 12, 2005; *Sustainable Community Amendment*, adopted February 18, 2008. Available at: <https://www.cityofperris.org/home/showpublisheddocument/449/637203139693370000>. Accessed April 20, 2022.

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4.14 UTILITIES

One comment letter related to utilities was received from the Eastern Municipal Water District (EMWD), in response to the NOP. In its written comments, EMWD reminded the Applicant to consult with the EMWD's Development Services Department early in the design process to set up a one-hour complimentary Due Diligence meeting prior to the Design Conditions (DC) Report preparation. The EMWD comment letter also set forth the contents of the DC Report and the process to be followed by the Project Applicant. The City of Perris contacted the EMWD. The EMWD provided a Water Supply Assessment (WSA), which is included as Appendix T.

Comments relating to the issue of water quality were raised in response to the 2022 NOP for this EIR. Specifically, the Eastern Municipal Water District (EMWD) requested that possible impacts to EMWD facilities because of the Project be defined and consultation with the EMWD be undertaken. The EMWD also requests that a Design Conditions report be prepared for the Project. An additional commentor, B&B Gardner, LP, requested that the EIR review, address, and explain directly how all off-site infrastructure plans, including street and utility improvements pursuant to the conditions of approval deal with and prevent drainage issues for their property and all other properties adjacent to the Project site. The commentor additionally requests that the EIR address specific hydrology, drainage patterns, flooding hazards and ground water impacts for properties east of the Project site, as well as the risk of pollutants released due to inundation or any other known or unknown potential risks associated with water run-off, spill-over or other issues. There were no comments addressing hydrology and water quality raised at the July 20, 2022 Draft EIR public scoping meeting.

4.14.1 Existing Setting

The Project site is in the planning area of the PVCCSP, which was originally approved by the City in 2012 by City Ordinance No. 1284 and Amendment 14 to the PVCCSP was approved by the City in March 2023. The Project site is generally flat with elevations ranging between 1,450 and 1,460 feet amsl, with stormwater runoff generally flowing to the southeast. An existing drainage swale is located along the north side of Ramona Expressway (i.e., along the southern edge of the Project site), which is owned and maintained by the Riverside County Flood Control and Water Conservation District (RCFCWCD) and runs in an east-west direction connecting to the Perris Valley Storm Drain about 1,850 feet to the east. As shown on **Figure 3-3**, Aerial Photo, the Project site is undeveloped. There are no utilities currently serving the Project site.

Potable water, recycled water, wastewater collection and treatment, drainage facilities, electrical service, natural gas service, telecommunication service, and solid waste collection and disposal services are provided to the Project area by the following purveyors identified in Table 4.14-1, *Utility Providers*.

Table 4.14-1
UTILITY PROVIDERS

Type of Service	Purveyor
Water, sewer, and recycled water	Eastern Municipal Water District (EMWD)
Telephone	Verizon, AT&T, T-Mobile
Electricity	Southern California Edison
Natural gas	Southern California Gas Company
Waste services and solid waste disposal	CR&R Waste Services
Cable television and internet	AT&T, Spectrum, Frontier

Potable and Recycled Water

Potable water service to the Project area is provided by the EMWD. The EMWD provides both retail and wholesale water supplies to a service area encompassing approximately 555 square miles with an estimated population of over 859,000 people (EMWD 2023). As of calendar year 2020, the EMWD supplied 84,673 acre-feet of potable water to 155,561 municipal connections (EMWD 2023). The EMWD has four sources of water supply: imported water purchased from the Metropolitan Water District of Southern California (MWD), potable groundwater, desalinated brackish groundwater, and recycled water. Approximately half of EMWD's retail demand is supplied through local water sources, which consists of potable groundwater, desalinated brackish groundwater, and recycled water. The remaining demand is supplied by a mix of raw and treated water purchased from the MWD.

The EMWD treats most of its raw water for potable use at two water filtration plants, located in Perris and Hemet. A small quantity of raw water is supplied directly to agricultural customers. Over the past five years, the EMWD's retail water supply portfolio averaged approximately 49 percent imported water from the MWD, 11 percent groundwater, 6 percent desalinated brackish groundwater, and 34 percent recycled water (EMWD 2023). As development increases the water demands within the EMWD's service area, it is anticipated that new demands will be met through a combination of additional imported water from the MWD and the development of local supply projects including increased production of potable groundwater, desalination of brackish groundwater, and use of recycled water. The EMWD also plans to continue its efforts to enhance water use efficiency within its service area (EMWD 2023). The EMWD owns and operates two microfiltration plants and two desalination plants to produce potable water from local and imported sources, in addition to potable water delivered directly from two of the MWD's treatment plants (EMWD 2021a). Potable water lines are located adjacent to the project site along Perris Boulevard and Perry Street.

In addition to the potable water system, the EMWD maintains a regional recycled water system that provides tertiary-treated recycled water to customers for agricultural, landscape irrigation, environmental, and industrial use. The EMWD's recycled water system consists of four regional water reclamation facilities (RWRFs) that treat wastewater for recycling: the San Jacinto Valley RWRF, the Moreno Valley RWRF, the Temecula Valley RWRF, and the Perris Valley RWRF, are spread throughout the EMWD's service area. A network of pipelines connects the four RWRFs, as well as several distribution storage ponds to manage the delivery of recycled water (EMWD 2021a). Recycled water lines are located adjacent to the Project site along Perris Boulevard and Perry Street.

Wastewater

Wastewater generated by the Project would be collected by the EMWD and treated at the EMWD's Perris Valley RWRf, which is the largest of the four RWRfs. The plant produces tertiary-treated water and can store more than 2 billion gallons of recycled water for use by surrounding agricultural customers.

With the completion of its most recent expansion in 2014, the Perris Valley RWRf has the current capacity to treat 22 million gallons per day (mgd) of wastewater, with an ultimate capacity of 100 mgd. Typical daily flows are 15.5 mgd. (EMWD 2021b). The nearest potential points of connection to the EMWD sanitary sewer lines are in Perris Boulevard and Ramona Expressway.

Storm Water Drainage

The Project site is located within the Master Drainage Plan (MDP) for the Perris Valley Area prepared by the RCFCWCD. The MDP outlines a master drainage plan for ultimate development, or "buildout" of the area. Since the area has not reached buildout conditions, the stormwater drainage systems in the valley are in differing stages of interim and ultimate designs (RCFCWCD 1991a).

The site drains gradually northwest to southeast with varying terrain with a flow slope of 0.3 percent. The site is infill and is bordered by developed properties. It has been graded in the past and shows evidence of continued disturbance and compaction. Some seasonal grasses are present. The runoff from the site is primarily sheet flow; there are no flow paths through the site. The ultimate outfall is the southeast corner of the site. The site is within the Perris Valley MDP, with the proposed Line E regional storm drain traversing the southwest corner of the property (United Engineering Group 2022).

The Project is in the vicinity of the Airport (Zone D), and a determination was made, due to the threat of bird strike, that no surface basins should be allowed. No drainage facilities are currently present on the Project site.

Electric Power

Southern California Edison (SCE) provides electrical service in the vicinity of the Project site. SCE electrical lines are located within Perris Boulevard and Ramona Expressway.

Telecommunications

Frontier Communications provides telecommunication services in the vicinity of the Project site. Frontier lines are located within Perris Boulevard and Ramona Expressway.

Solid Waste

Solid waste, recycling, and green waste collection and disposal service in the City of Perris is provided by CR&R Waste Services. The County of Riverside also sponsors several hazardous waste collection events that are open to residents of the county throughout the year. Waste collected by CR&R is transported to the CR&R Perris Transfer Station and Materials Recovery Facility located at 1706 Goetz Road, approximately 5 miles south of the Project site. After the transfer station, the solid waste produced from the Project would be transported to either the Badlands Landfill or El Sobrante Landfill.

The Project area is located approximately 9.3 miles southwest of the Badlands Landfill located at 31125 Ironwood Avenue in the City of Moreno Valley. The Badlands Landfill is a regional municipal solid waste landfill that is owned and operated by Riverside County. The Badlands Landfill has a total capacity of 82,300,000 cubic yards (cy) is permitted to accept a maximum of 5,000 tons per day, and, as of December 2020, has a remaining capacity of 7,800,000 cy. According to CalRecycle, the landfill has a “ceased operation date” of January 1, 2059 and continues to operate as of this writing (CalRecycle 2023a). The Project area is located approximately 15 miles northeast of the El Sobrante Landfill located at 10910 Dawson Canyon Road in the City of Corona. The landfill is a regional municipal solid waste landfill that is owned and operated by USA Waste Services of California, Inc. The El Sobrante Landfill has a total capacity of 209,910,000 cy, is permitted to accept 16,054 tons per day, and, as of April 2018, has a remaining capacity of 143,977,170 cy (CalRecycle 2023b).

The Riverside County Department of Waste Resources (RCDWR) is charged with the responsibility of, among other things, meeting the solid waste disposal needs of all Riverside County residents. Each year, the County prepares a 15-year projection of disposal capacity as part of the annual reporting requirements to the State. The Riverside Countywide Siting Element serves as a policy manual of how the County will meet the disposal needs of all Riverside County residents and provide a minimum of 15 years of disposal capacity at its landfills at all times (RCDWR 2023).

4.14.2 Existing Policies and Regulations

4.14.2.1 Federal Regulations

Clean Water Act

The United States Environmental Protection Agency (USEPA) has delegated responsibility for compliance with the federal Clean Water Act to the State of California, which is discussed under State Regulations. There are no other federal regulations applicable to Utilities and Service Systems.

4.14.2.2 State Regulations

Clean Water Act

The Clean Water Act prohibits 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. Applicable NPDES permits include those managed on a statewide basis by the State Water Resources Control Board (i.e., General Permits), such as the General Industrial Activities Storm Water Permit and the General Construction Activity Storm Water Permit. Both permits require a Storm Water Pollution Prevention Plan (SWPPP); the industrial permit requires an industrial SWPPP used in perpetuity based on the SIC code, and the construction permit requires a SWPPP for construction phase only. In addition, the State Board issues statewide municipal permits for Municipal Separate Storm Sewer Systems (MS4) owned by municipalities.

The MS4 permit program regulates all stormwater discharges from municipal storm drains. The Santa Ana Regional Water Quality Control Board (RWQCB) regulates the Riverside County MS4 permit (Order RB8-2010-0033), which requires the principal permittee (RCFCWCD) and co-permittees (County of Riverside and cities, including the City of Perris) to develop several items designed to reduce pollutants

in urban runoff to the Maximum Extent Practicable (MEP)¹. Specifically for qualifying new developments and redevelopments, this includes a Water Quality Management Plan (WQMP).

Water Code Sections 13550-13556

California Water Code Sections 13550-13556 state that local, regional, or State agencies shall not use water from any source of quality suitable for potable domestic use if suitable recycled water is available as provided in Water Code Section 13550.

Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act was established to ensure adequate water supplies are available for future uses. To promote the conservation and efficient use of water, the Act requires local agencies to adopt a water efficient landscape ordinance. The City of Perris implements the model ordinance adopted by the State through regulations contained in Perris Municipal Code Section 19.70, Landscaping.

Urban Water Management Planning Act

The Urban Water Management Planning Act (UWMP Act) (California Water Code Sections 10610 et. seq.) was enacted in 1983 and applies to municipal water suppliers, such as the EMWD, that serve more than 3,000 customers or provide more than 3,000 acre-feet per year (AFY) of water. The UWMP Act requires these suppliers to prepare and update their Urban Water Management Plan (UWMP) every five years to demonstrate an appropriate level of reliability in supplying anticipated short-term and long-term water demands during normal, single-dry, and multiple-dry years.

Senate Bill 610 (SB 610) – Water Supply Assessments

SB 610 requires an assessment of whether available water supplies are sufficient to serve the demand generated by a proposed project, as well as the reasonably foreseeable cumulative demand in the region over the next 20 years under average normal year, single dry year, and multiple dry year conditions. Under SB 610, a Water Supply Assessment (WSA) must be prepared in conjunction with the land use approval process associated with a project and is required for any project that is subject to CEQA and meets certain criteria relative to size. Relevant to the Project, this includes a proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.

¹ The term, Maximum Extent Practicable (or MEP) comes from the federal Clean Water Act, Section 402(p)(3)(B). The MEP standard involves applying BMPs that are effective in reducing the discharge of pollutants in storm water runoff. In discussing the MEP standard, the State Board has said the following: "There must be a serious attempt to comply, and practical solutions may not be lightly rejected. If, from the list of BMPs, a permittee chooses only a few of the least expensive methods, it is likely that MEP has not been met. On the other hand, if a permittee employs all applicable BMPs except those where it can show that they are not technically feasible in the locality, or whose cost would exceed any benefit to be derived, it would have met the standard. MEP requires permittees to choose effective BMPs, and to reject applicable BMPs only where other effective BMPs will serve the same purpose, the BMPs would not be technically feasible, or the cost would be prohibitive." (SWRCB 2023).

California Integrated Waste Management Act (AB 939)

The California Integrated Waste Management Act of 1989 (AB 939), created the Board now known as California Department of Resources Recycling and Recovery (CalRecycle) and accomplished the following: (1) it required each jurisdiction in the State to submit detailed solid waste planning documents for CalRecycle approval; (2) it set diversion requirements of 25 percent in 1995 and 50 percent in 2000; (3) it established a comprehensive statewide system of permitting, inspections, enforcement, and maintenance for solid waste facilities; and (4) it authorized local jurisdictions to impose fees based on the types or amounts of solid waste generated. Jurisdictions select and implement the combination of waste prevention, reuse, recycling, and composting programs that best meet the needs of their community while achieving the diversion requirements (CalRecycle 2023c).

Solid Waste Disposal Measurement Act of 2008

The purpose of the Solid Waste Disposal Measurement Act of 2008 (SB 1016) is to make the process of goal measurement (as established by AB 939) simpler, more efficient, and more accurate. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population (or in some cases employment) and (2) its disposal, as reported by disposal facilities. Each year CalRecycle calculates each jurisdiction's per capita (per resident or per employee) disposal rates that are compared to that jurisdiction's 50 percent per capita disposal target (CLI 2008).

Waste Reuse and Recycling Act (AB 1327)

The Waste Reuse and Recycling Act (WRRRA) required the California Integrated Waste Management Board (CIWMB) to approve a model ordinance for adoption by any local government for the transfer, receipt, storage, and loading of recyclable materials in development projects by March 1, 1993. The WRRRA also required local agencies to adopt a local ordinance by September 1, 1993 or allow the model ordinance to take effect. The WRRRA requires all development projects that are commercial, industrial, institutional, or marina in nature and where solid waste is collected and loaded, to provide an adequate area for collecting and loading recyclable materials over the lifetime of the project (CalRecycle 2023c).

Assembly Bill 341

Assembly Bill 341 (AB 341) (Chapter 476, Statutes of 2011) directed CalRecycle to develop and adopt regulations for mandatory commercial recycling. The final regulation was approved by the Office of Administrative Law on May 7, 2012. AB 341 was designed to help meet California's recycling goal of 75 percent by the year 2020. AB 341 requires all commercial businesses and public entities that generate four cubic yards or more of waste per week to have a recycling program in place. In addition, multi-family apartments with five or more units are also required to form a recycling program (CalRecycle 2023d). The State did not meet its 75 percent by 2020 recycling goal set out in AB 341. However, CalRecycle identified five strategies and three additional focus areas that can be pursued by the State to reach the 75 percent goal (CalRecycle 2020).

4.14.2.3 Regional Regulations

Perris Valley Master Drainage Plan and Perris Valley Area Drainage Plan

The RCFCWCD adopted the Perris Valley MDP and the Perris Valley Area Drainage Plan (July 1987, revised June 1991), the boundaries of which include the Project site. According to the RCFCWCD, the primary responsibility for the design and construction of all Area Drainage Plan (ADP) facilities lies with the RCFCWCD so that the maximum control and accountability for costs accruing to the ADP funds can be maintained. The following criteria will be applied by the RCFCWCD Chief Engineer to assist in the evaluation of the engineering and administration responsibility for construction contracts related to the proposed Project storm drain connections: (1) design responsibility for major facilities, including channels, retention basins, and storm drains with diameters of more than 60 inches will be designed by the RCFCWCD (or through private engineering contracts administered by the RCFCWCD), unless otherwise authorized in writing by the Chief Engineer; (2) local facilities and lateral storm drains with diameters of 60 inches or less will normally be designed by the developer's engineer using District standards, providing that the Chief Engineer has authorized the developer (in writing) to proceed in this manner.

Since the Project site is located within the Perris Valley ADP, the Project will be subject to applicable ADP fees. The Perris Valley ADP fees are currently set at \$8,875 per acre (RCFCWCD 1991b). The ADP fees are paid at the time of tentative map recordation, unless deferred by the developer to the grading permit or building permit stage. The actual ADP fee paid by a project developer may be less than \$8,875 per acre, due to credits for drainage infrastructure previously constructed or drainage facilities constructed, as part of development proposals. The proposed Project Applicant/Developer is not expected to construct facilities for which credit can be given, and instead will be paying the Project's fair share drainage fees.

The RCFCWCD, City of Moreno Valley, and City of Perris have also agreed upon an Area Drainage Plan (RCFCWCD 1991b) that accompanies the MDP and provides the funding mechanism used to offset taxpayer costs for proposed drainage facilities.

Urban Water Management Plan

The 2020 Urban Water Management Plan (UWMP) was adopted by the EMWD Board of Directors on June 30, 2021. This plan documents the EMWD's projected supplies and demands in five-year increments through the year 2045, certifies the EMWD's compliance with water use efficiency targets defined in the Water Conservation Act of 2009, and demonstrates the EMWD's supply reliability, even under dry year hydrologic conditions lasting multiple years. Approximately half of the EMWD's existing and future retail demand will be supplied through local sources such as groundwater, brackish groundwater desalination, and recycled water, with the balance coming from imported water delivered by the MWD. Demands shown in the 2020 UWMP are not project specific, but rather, projected in aggregate using best available current and planned land use information over the EMWD's entire service area. The 2020 UWMP relies heavily on information and assurances contained within the MWD's 2020 Urban Water Management Plan when evaluating service supply reliability.

4.14.2.4 Local Regulations

City of Perris General Plan Conservation Element

The following are applicable goals, policies, and implementation measures from the Perris Comprehensive General Plan 2030 (Perris GP 2030) related to utilities and service systems.

Goal V-An adequate water supply to support existing and future land uses, anticipated in the Land Use Element.

Policy V.A-Coordinate land-planning efforts with the local water purveyors.

Implementation Measures

V.A.2-Require the use of new technologies and water conserving plant materials for landscaping.

Goal VIII-Create a vision for energy and resource conservation and the use of green building design of the City, to protect the environment, improve quality of life, and promote sustainability.

Policy VIII.A- Adopt and maintain development regulations that encourage water and resource conservation.

Implementation Measures

VIII.A.1- Use indigenous and/or drought resistant planting materials and efficient irrigation systems in residential projects as a means of reducing water demand, including smart irrigation systems.

VIII.A.2-Use indigenous and/or drought resistant planting and efficient irrigation systems with smart controls in all new and refurbished commercial and industrial development projects. Also, restrict use of turf to 25% or less of the landscaped areas.

VIII.A.7-Use indigenous and/or drought-resistant planting and efficient irrigation systems with smart controls in all new and refurbished commercial and industrial development projects. Also, restrict use of turf to 25% or less of the landscaped areas.

Policy VIII.B - Adopt and maintain development regulations that encourage recycling and reduced waste generation by construction projects.

City of Perris General Plan Land Use Element

Goal II- New development consistent with infrastructure capacity and municipal services capabilities.

Policy II.A -Require new development to pay its full, fair share of infrastructure costs.

Perris Municipal Code

The Perris Municipal Code contains the following provisions relevant to utilities and services systems:

- **Title 7** – Health and Welfare includes Chapter 7.16 – Rubbish Collection and Disposal and Chapter 7.44 – Construction and Demolition Waste Management. These chapters address solid waste regulations.

- **Title 13** – *Utilities* includes Chapter 13.04 – *Underground Utility Installations*, Chapter 13.12 – *Television Systems*, and Chapter 13.16 – *Violation; Penalty*. This title addresses electric, communication or similar or associated services.
- **Title 14** – *Water and Sewage*. This title includes several chapters on potable water and wastewater definitions and regulations. It also includes Chapter 14.22 - *Stormwater/Urban Runoff Management and Discharge Control*, which regulates stormwater runoff and water quality.
- **Title 15** – *Floodplain Regulations*, includes provisions for all areas with special flood hazards.
- **Title 18** – *Subdivisions* includes Chapter 18.32 – *Reservations and Fees* addressing drainage fees.

4.14.2.5 Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to utilities and service systems. The Standards and Guidelines summarized below from the PVCCSP are incorporated as part of the proposed Project and are assumed in the analysis presented in this section. The chapters/section numbers provided correspond to the PVCCSP chapters/sections. There were no mitigation measures identified for utilities and service systems included in the PVCCSP EIR (City of Perris 2011, p. 4.11-46).

On-Site Design Standards and Guidelines (Chapter 4.0 of the PVCCSP)

4.2 On-Site Standards and Guidelines

4.2.1 General On-Site Project Development Standards and Guidelines

Water Quality Management Plan

Most developments are required to implement a Water Quality Management Plan (WQMP) in accordance with the most recently adopted Riverside County MS4 NPDES Permit (Board Order R8-2010-0033). Approval of a WQMP plan by the City requires submittal of a document with supporting data which includes at a minimum, a site “Post-Construction BMP Plan,” and treatment control facility sizing calculations. Site design, based on Low Impact Design (LID) elements and Source Control BMPs, must be incorporated into the site design. If these two types of BMPs do not sufficiently manage hydromodification and treat expected pollutants, then treatment control facilities must be implemented to assure proper flow management and pollutant treatment. Treatment control BMPs are in accordance with Riverside County Storm Water Best Management Practice Handbook. The RWQCB continuously updates impairments as studies are completed, the most current version of impairment data should be reviewed prior to preparation of Preliminary or Final WQMP document.

Trash and Recyclable Materials

Development of all PVCCSP sites shall contain enclosures (or compactors) for collection of trash and recyclable materials subject to water quality and best management practices. All trash enclosures shall comply with City of Perris Standards and with applicable City of Perris recycling requirements.

Waste Hauling

Construction and other waste disposal shall be hauled to a city approved facility.

Construction of Infrastructure May Be Financed

Construction of required infrastructure (such as sewer and water lines, storm drains, and roads) may be financed through the establishment of a financing district (e.g., Assessment District, Community Facilities District, or Road and Bridge Benefit District). Refer to Section 13 of the PVCCSP.

*4.2.2.7 Water Quality Site Design***General Standards**

Refer to NPDES Permit Board Order R8-2010-0033 for complete and current information on water quality management standards. Current requirements can be obtained by visiting the Riverside County Flood Control website at <http://rcflood.org/NPDES/SantaAnaWS.aspx> specifically to review the current WQMP Manual and the Low Impact Development Manual.

Water Quality Management Plan

Prepare a WQMP in accordance with the Riverside County MS4 NPDES Permit. Receive approval from the City of Perris on the WQMP. The MS4 Permit requires that applicable new development and redevelopment project: (i) design the site to minimize imperviousness, detain runoff, and infiltrate, reuse or evapotranspire runoff where feasible; (ii) cover or control sources of stormwater pollutants; (iii) use LID to infiltrate, evapotranspire, harvest and use, or treat runoff from impervious surfaces; (iv) ensure runoff does not create a hydrologic condition of concern; and (v) maintain Stormwater BMPs.

Low Impact Design

As stated in the Riverside County LID Manual, when LID is implemented correctly on a site, it provides two primary benefits: 1) hydromodification flows are managed across the site and 2) expected pollutants are reduced in the remaining runoff. The NPDES Permit requires that the design capture volume be first infiltrated, evapotranspired, or harvested and reused. When such retention methods are infeasible, the remainder of the volume can be biotreated.

Source Control

Source Control features are also required to be implemented for each project as part of the Final WQMP. Source Control Features are those measures which can be taken to eliminate the presence of pollutants through prevention.

BMP Features in “Visibility Zone”

Sites that necessitate the placement of Water Quality BMPs adjacent to public rights-of-way shall follow the landscaping requirements of the Specific Plan. Treatment control BMPs adjacent to the public right-of-way must drain properly to adequate storm drain facilities. If no storm drain is available, alternative drainage shall be proposed for approval by City Engineer. Treatment control BMPs are not to be placed within public right-of-way.

The following elements shall be considered and/or required in site design pursuant to the PVCCSP (Section 4.0-23):

- Open Jointed Surfaces for Sidewalks
- Open Jointed Surfaces in Low Traffic Areas
- Filter Strips
- Filter Strip Adjoining Impervious Surfaces
- Roof Runoff Discharge into Landscape Area
- Second Treatment of Roof Water
- Covered Trash Enclosures

4.2.7 Utilities

Utility Connections and Meters

All utility connections and meters shall be coordinated with the development of the site and should not be exposed, except where deemed appropriate or necessary by the building official. To the greatest extent possible, these utility connections should be integrated into the building or the architectural design.

Electrical, Telephone, CATV and Similar Service Wires and Cables

All electrical, telephone, CATV and similar service wires and cables which provide direct service to the property being developed, within the exterior boundary lines of such property, shall be installed underground.

Electrical Transmission Lines

Electrical transmission lines 66kv and less shall be installed underground.

Off-Site Design Standards and Guidelines (Chapter 5.0 of the PVCCSP)

5.4.1 Water Standards and Guidelines

Design Standards

All waterlines shall be designed and located per EMWD standards. All waterline facilities shall require the approval of both EMWD and the City of Perris.

Water Supply Assessment

Individual projects will be required to comply with Senate Bill 610 and 221 for the preparation of a WSA as follows:

- Retail shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space.
- Commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.

- Hotel/Motel having more than 500 rooms.
- Industrial, manufacturing or processing plants and industrial parks housing more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.

Plan of Service

Developers are advised to coordinate with EMWD to determine water service requirements through EMWD's Plan of Service process.

Fire Protection

All water facilities shall be sized to provide adequate fire protection per the requirements of the City of Perris Building and Safety Department.

Irrigation Water Demand

Developers shall provide information that estimates a project's irrigation water demand and submit conceptual landscape/irrigation conceptual plans to EMWD for review during the Plan of Service process.

Conservation Measures

Conservation measures will be incorporated into the project including water saving devices and systems.

Existing Facility Relocation

Relocation of existing water facilities will require coordination with and approval by EMWD. All relocation costs shall be incurred by the development.

Inspection

All waterlines shall be placed underground and inspected by EMWD and the City of Perris.

5.4.2 Sewer Standards and Guidelines**Design Standards**

All sewer lines shall be designed and located per EMWD standards. All sewer facilities shall be approved by both EMWD and the City of Perris.

Plan of Service

Developers are advised to coordinate with EMWD to determine sewer service requirements through EMWD's Plan of Service process.

Existing Sewer Lines May be Relocated to Facilitate Development

Relocation of existing sewer facilities will require coordination with and approval by EMWD. All relocation costs shall be incurred by the development.

On-Site Sewage Disposal Systems

On-site sewage disposal systems are prohibited for all non-residential land uses, unless otherwise approved by the City Engineer

*5.4.3 Recycled Water Standards and Guidelines***Recycled Water Candidates**

Projects located within one mile of existing EMWD recycled water facilities and require more than 3,000 sf of landscape are potential recycled water candidates. EMWD should be contacted early in the development process to determine if a recycled water connection will be required or if recycled water facilities need to be constructed.

On-Site Recycled Waterline

All projects within the PVCCSP area will be required to install on-site recycled waterlines (purple pipe) and an irrigation meter for connection to existing or future recycling facilities.

*5.4.4 Storm Drain Standards and Guidelines***Riverside County Flood Control and Water Conservation District Standard**

Drainage and flood control facilities shall be provided in accordance with the City of Perris standards which are based on RCFCWCD standards.

Collect and Discharge Storm Water

Storm drain facilities shall be designed to collect and discharge storm water runoff without damage to streets or adjacent properties.

San Jacinto River

The intent of the San Jacinto River Plan is to achieve a balance between resource protection and reasonable economic development by creating higher development standards for projects posing potential impacts to the San Jacinto River. Once the Perris Valley MDP has been updated, projects will be required to meet these guidelines. In the meantime, all projects shall adhere to the adopted interim development criteria for the San Jacinto River.

On-site Retention

Installation of a nuisance storm drain line within landscaped median is required where possible or where storm drain is available.

There are no standards and guidelines in the PVCCSP for natural gas or telecommunication facilities.

4.14.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, a significant utilities impact would occur if implementation of the proposed project would result in any of the following:

- a) Would the project 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 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?

4.14.4 Environmental Impacts

Threshold a: Would the project 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 of which could cause significant environmental effects?

Impact Analysis

Water demand associated with the proposed Project would consist of interior plumbing devices (i.e., sinks, toilets, faucets), outdoor landscape irrigation, and various industrial process systems. As previously stated, the Project would receive water services from EMWD.

In the EMWD's 2020 UWMP, the demand projections for the parcels covering the Project site were estimated based on Commercial Retail land use, with a total demand of approximately 119.08 acre-feet per year (AFY). Based on information provided by the Applicant and lead agency, the projected demand from the warehouse and commercial retail components of the Project is estimated to total approximately 48.30 AFY, which falls within the limits of estimated demand considered in the 2020 UWMP (EMWD 2023).

From a facilities perspective, the Project may be conditioned to construct on-site water facilities needed to distribute water throughout the Project site. It is anticipated that the existing off-site facilities would accommodate the onsite water flow requirements. The EMWD has 12-inch water mains that surround the Project site on every side. A fire flow test was completed on October 28, 2022. Fire flow was determined to be sufficient. It is on file at the EMWD. The final design and sizing of on-site facilities

would accommodate the anticipated water demand (landscaping, potable, and fire flow) based on the proposed land use. These new water distribution lines would connect to existing facilities that are located within the Project area and within adjacent roadways.

The Project would include the installation of on-site storm drain, water quality, water, sewer, electric, natural gas, and telecommunications infrastructure systems to serve the proposed warehouse and retail uses. Infrastructure improvements would also include the construction of an extension of the planned Line E storm drain box culvert, which would be constructed below grade along the southern edge of the warehouse portion of the Project site, then turning to the southeast beneath the retail portion of the Project site and continuing eastward to either terminate at the eastern edge of the Project site or continuing onto and through the off-site property immediately adjacent to the east. If undertaken by the Project applicant, is anticipated that this off-site portion of the Line E storm drain would be constructed as part of the Project. The onsite utility infrastructure would connect to existing utilities in the vicinity of the Project site or new utility lines that would be installed within the public right-of-way adjacent to the Project site. Additionally, the EMWD provided a Will-Serve letter on April 20, 2022, committing to provide water and sewer services to the Project, with the condition that the developer must complete the necessary arrangements in accordance with EMWD rules and regulations, as discussed below (EMWD 2022). The Will-Serve letter is provided as Appendix V to this EIR.

Prior to construction, the developer would contact EMWD staff to establish development design conditions and determine if any revisions are required to the master plan. According to the EMWD's policies, the Project may be conditioned to construct a recycled water system separately from the potable water system. The system will need to be constructed to recycle water standards. The Project may also be conditioned to construct off-site recycled water facilities. The EMWD will make a final determination on requirements for recycled water use and facilities during the development design conditions phase of the Project.

The potential installation of utility improvements could result in environmental effects; however, the effects of constructing and relocating on-site utilities are described, analyzed, and mitigated in this DEIR (e.g., air quality impacts, impacts to biological and cultural resources, water quality impacts, noise impacts, etc.). Any applicable PVCCSP EIR mitigation measures and Project-specific mitigation measures for construction identified for each topical issue would address potential significant impacts associated with construction and installation of utilities. Possible construction of off-site utilities would be analyzed through the conditions provided in the development design conditions which would be created in accordance with local and EMWD regulations. Therefore, through consistent implementation of a variety of measures related to construction impacts, no additional impacts related to construction and operation of utility systems would occur and are less than significant and no mitigation is required.

Mitigation Measures

The Project is required to comply with the applicable PVCCSP section 13.3.5 guidance. No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Threshold 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?

Impact Analysis

The City of Perris requested that the EMWD prepare a WSA for the Project. The WSA was prepared by the EMWD in January 2023 and satisfies the requirements of Water Code §10910 et seq. and Government Code §66473.7 as amended by Senate Bill 610 (SB610) and Senate Bill 221 (SB 221) in 2001. The WSA is included in full in Appendix T and the analysis presented in the WSA is summarized below.

As described in Section 4.14.1 Existing Setting above, the EMWD's water supply has four sources: imported water purchased from the MWD, potable groundwater, desalinated brackish groundwater, and recycled water. Approximately half of EMWD's retail demand is supplied through local water sources, which consists of potable groundwater, desalinated brackish groundwater, and recycled water. The remaining demand is supplied by a mix of raw and treated water purchased from the MWD. Over the past five years, the EMWD's retail water supply portfolio averaged approximately 49 percent imported water, 11 percent groundwater, 6 percent desalinated brackish groundwater, and 34 percent recycled water. The EMWD treats most of its raw water for potable use at two water filtration plants, located in Perris and Hemet. A small quantity of raw water is supplied directly to agricultural customers.

In the EMWD's 2020 UWMP, the demand projections for the parcels covering the Project site were estimated based on Commercial Retail land use, with a total demand of approximately 119.08 acre-feet per year (AFY). Based on information provided by the Applicant and lead agency, the projected demand from the warehouse and commercial retail components of the Project is estimated to total approximately 48.30 AFY, which falls within the limits of estimated demand considered in the 2020 UWMP (EMWD 2023). The specific facilities needed to serve the Project's water demands would be defined in the design conditions phase of the EMWD's New Development Process.

The EMWD plans to supply new water demands in its service area, including the Project, through a combination of additional imported water purchases from the MWD and the ongoing development of the EMWD's local supply resources. Based on present information and the assurance that the MWD is engaged in identifying solutions that will ensure a reliable long-term water supply for its member agencies in combination with the existing supply portfolio, the EMWD has determined that it would be able to provide adequate water supplies to meet the potable water demand for this Project as part of its existing and future demands.

The EMWD's 2020 UWMP discusses the supply reliability for the EMWD during dry years. The EMWD expects its local supplies to remain highly reliable and resilient, even under severe hydrologic conditions. Similarly, the MWD's UWMP shows that the MWD would have the ability to meet all its member agencies' project supplemental demand through 2045, even under a repeat of historic drought scenarios. The EMWD maintains a Water Shortage Contingency Plan (WSCP) that aims to reduce demand during water shortage using significant penalties for wasteful water use. The EMWD's WSCP details demand reductions for several stages of shortage through a 50 percent or greater reduction. Additional information about contingency planning is included in Chapter 8 of EMWD's 2020 UWMP (EMWD 2021a).

If the lead agency determines adequate water supply exists for the Project, the developer of this Project would be required to meet with EMWD Development Services Staff to establish development design

conditions, as discussed above. The development design conditions will detail water, wastewater, and recycled water requirements to serve the Project. An agreement may be developed prior to construction if additional funding is determined to be required to reduce existing customer demand on imported supplies through the expansion of local resources or implementation of additional conservation programs. If required, this reduction of existing customer demand on imported water supplies would free up allocated imported water to be used to serve this Project during multiple dry year conditions. The amount of funding would be determined by the EMWD (if required) and may take the form of a new component of connection fees or a separate charge. If there is a change in the circumstances detailed in this assessment, the EMWD will address the changes in the development design conditions for the Project. Modifications at the development design conditions stage could reduce the amount of water available to serve this Project.

Because the UWMP has determined that future water supplies will be sufficient to meet projected water demands in normal, single-dry, and multiple-dry year conditions based on the Perris GP 2030 land use designation of the Project site, and the projected water demand of the Project site is substantially less than the water demand assumed for the Project site in the most recent UWMP, the Project as currently defined would have sufficient water supplies in normal and drought conditions for the foreseeable future. Therefore, impacts are less than significant, and no mitigation is required.

Mitigation Measures

The Project is required to comply with the applicable PVCCSP section 13.3.5 guidance. No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Threshold 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?

Impact Analysis

Wastewater generated by the Project would be collected by the EMWD and treated at the Perris Valley RWRF, which has the current capacity to treat 22 million gallons per day (mgd) of wastewater, with an ultimate capacity of 100 mgd. Typical daily flows are 15.5 mgd (EMWD 2021b).

Wastewater generated by the Project can be partially estimated using the EMWD wastewater generation factor for Light Industrial and Commercial Retail uses as identified in EMWD's 2015 Wastewater Collection System Master Plan, which is 293.75 gpd/acre for business park/light industrial/warehouse land uses and 1,175 gpd/acre for commercial retail uses (EMWD 2015). The generation factor for industrial was multiplied by the proposed 774,419 square foot (17.8 acres) industrial warehouse which is approximately 5,228 gpd (0.005 mgd; average daily flow). The generation factor for commercial retail uses was multiplied by the proposed 45,000 square feet (1 acre) of commercial/retail buildings which is approximately 1,175 gpd (0.001 mgd; average daily flow). This represents approximately 0.03 percent of the current daily treatment capacity of the Perris Valley RWRF.

Additionally, the EMWD provided a Will-Serve letter on April 20, 2022, committing to provide water and sewer services to the Project, with the condition that the developer must complete the necessary arrangements in accordance with EMWD rules and regulations, as discussed in Threshold a above.

The EMWD tracks development projects from planning to construction in its Database of Proposed Projects (DOPP) with details to calculate future wastewater flows. A wastewater capacity analysis using the DOPP and land use-based future growth information was performed as part of the EMWD 2015 Wastewater Collection System Master Plan to identify system deficiencies and infrastructure projects needed now and into the future (EMWD 2015). Because the PVCCSP was first approved in 2012, it can be reasonably assumed that the EMWD's subsequent planning projections for wastewater generation and treatment capacity used the PVCCSP land uses, which in the case of the Project site was listed as Commercial in the PVCCSP. Since the wastewater generation factor identified in the EMWD's 2015 Wastewater Collection System Master Plan is actually substantially higher for Commercial land uses than for Light Industrial/Warehouse Uses (1,175 gpd/acre for Commercial and 293.75 gpd/acre for Light Industrial), the Project would result in reduced wastewater flows as compared to what was assumed under the PVCCSP. Therefore, because the development of the PVCCSP has been accounted for in the planning efforts of the wastewater treatment provider EMWD, the Project would not require a capacity determination by the EMWD for wastewater treatment.

The EMWD has sufficient capacity to treat wastewater generated by the Project in addition to the EMWD's existing commitments. No new or expanded wastewater treatment facilities would be required. Therefore, impacts are less than significant, and no mitigation is required.

Mitigation Measures

The Project is required to comply with the applicable PVCCSP section 13.3.5 guidance. No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Threshold 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?

Impact Analysis

Construction Waste Generation

Construction of the Project would result in the generation of construction-related solid waste. Based on the USEPA's construction waste generation rate of 3.89 pounds per square foot (lbs/sf) for Light Industrial uses, as identified in the PVCCSP EIR, construction of a 774,419-square-foot building to accommodate 754,419 square feet for high-cube, non-refrigerated warehouse distribution uses with the remaining 20,000 square feet for supporting office uses would result in the generation of approximately 1,506 tons of construction-related solid waste.² Additionally, the Project also includes commercial retail/restaurant uses within both an approximately 4.7-acre portion of the Project site to the south of

² The Light Industrial construction waste generation rate was used since the office uses are ancillary.

the warehouse building along the north side of Ramona Expressway and an approximately 4.8-acre portion of the Project site to the west of the warehouse building along the east side of Perris Boulevard. The future commercial developments would include approximately 45,000 square feet of retail and restaurant uses. Based on the USEPA's construction waste generation rate of 3.89 pounds per square foot (lbs/sf) for Commercial uses, as identified in the PVCCSP EIR, construction of 45,000 square feet of commercial uses would result in the generation of approximately 88 tons of construction-related solid waste. In total the proposed Project would generate approximately 1,594 tons of construction-related solid waste.

The Project's building construction is anticipated to occur over a period of approximately 11 months, which corresponds to an average of approximately 4.8 tons of construction waste generated per day from building construction activity.

The PVCCSP EIR estimated that construction of future development under the PVCCSP would generate approximately 104,671.09 tons of solid waste over the 20-year construction period, which was determined to be approximately 0.10 percent of the combined annual capacity (i.e., yearly intake) of the Badlands and El Sobrante landfills (see PVCCSP EIR Table 4.11-J, Estimated Construction-Related Solid Waste Generation and Contribution). The PVCCSP EIR concluded that, with the development of the PVCCSP, construction-related solid waste would not substantially contribute to exceeding the permitted capacity of these landfills (City of Perris 2011). The PVCCSP EIR estimates that operation of future development within the PVCCSP would generate approximately 544,048.96 tons per year of solid waste, which was calculated to be approximately 10.65 percent of the combined annual capacity of the Badlands and El Sobrante landfills (see PVCCSP EIR Table 4.11-K, Anticipated Solid Waste Generation and Contribution). The PVCCSP EIR concluded that, with the development of the PVCCSP, operational solid waste would not substantially contribute to exceeding the permitted capacity of the local infrastructure and impacts are less than significant (City of Perris 2011).

The estimated 1,594 tons of solid waste generated by construction of the Project is approximately 2.3 percent of the total solid waste planned for Light Industrial uses in the PVCCSP EIR (i.e., 70,009.81 tons), which was determined to be a less than significant impact to the landfills serving the City (City of Perris 2011). Because the Badlands Landfill is currently permitted to accept 4,800 tons per day and the El Sobrante Landfill is permitted to accept 16,054 tons per day, the Project's daily rate of 4.8 tons/day of solid waste represents approximately 0.1 percent of the Badlands Landfill maximum daily capacity and 0.02 percent of the El Sobrante Landfill maximum daily capacity.

Furthermore, it is anticipated that the solid waste generated during construction of the Project that would be sent to landfills would be less than that amount estimated in the PVCCSP EIR as a result of increasingly stringent waste diversion regulations. Therefore, through the implementation of existing regulations the disposal of construction-related solid waste associated with the Project would not exceed the permitted capacity of the Badlands or El Sobrante Landfills, and the impact would be less than significant.

Operational Waste Generation

Operation of the Project will generate solid waste. According to the operational solid waste disposal factor of 0.0108 tons/SF/year for Light Industrial uses as identified in the PVCCSP EIR, operation of the Project's 774,419 square feet would generate approximately 8,364 tons per year (23 tons per day) of solid waste requiring disposal. This represents approximately 2.2 percent of the estimated annual solid

waste stream for the PVCCSP (i.e., 388,743.42 tons/year), which the PVCCSP EIR determined was a less than significant impact to the receiving landfills (City of Perris 2011). The estimated daily generation rate of 23 tons/day represents approximately 5 percent of the maximum daily capacity of the Badlands Landfill and 0.14 percent of the maximum daily capacity of the El Sobrante Landfill.

Furthermore, it is anticipated that the solid waste generated by the Project that would be sent to landfills would be less than that amount estimated in the PVCCSP EIR as a result of increasingly stringent waste diversion regulations. Therefore, through the implementation of existing regulations the disposal of operational solid waste associated with the Project would not exceed the permitted capacity of the Badlands or El Sobrante Landfills, and the impact would be less than significant.

Mitigation Measures

The Project is required to comply with the applicable PVCCSP section 13.3.5 guidance. No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Threshold e: Would the project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Impact Analysis

The PVCCSP EIR Initial Study concluded that the PVCCSP will comply with all regulatory requirements regarding solid waste and impacts were less than significant. Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to decrease solid waste generation through mandatory reductions in solid waste quantities (e.g., through recycling and composting of green waste) and the safe and efficient transport of solid waste. The proposed Project will comply with all regulatory requirements regarding solid waste, and it will coordinate with CR&R Waste Services to develop a collection program for recyclables, such as paper, plastics, glass, and aluminum, in accordance with local and State programs, including AB 341, and Mandatory Commercial Recycling.

Additionally, the Project would be required to comply with activities enacted by the City pursuant to AB 939 (e.g., composting, facility recovery, household hazardous waste, policy incentives, public education, recycling, source reduction, and special waste materials). AB 939 required that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The diversion goal was increased to 75 percent by SB 341. Further, the Solid Waste Disposal Measurement Act of 2008 (SB 1016) was established to make the process of goal measurement (as established by AB 939) simpler, timelier, and more accurate. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population (or in some cases employment); and (2) its disposal, as reported by disposal facilities. Building operators would participate in the City's recycling programs and comply with hazardous waste disposal regulations. Through implementation of existing regulations, the Project would not conflict with any federal, State, or local regulations related to solid waste and impacts are less than significant.

Mitigation Measures

The Project is required to comply with the applicable PVCCSP section 13.3.5 guidance. No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

4.14.5 Cumulative Impacts

The geographic context for cumulative impacts to Utilities and Service Systems are the service areas for the respective utility providers. Future public and private development projects in these service areas will result in the expansion of utilities to serve all the developable parcels in the PVCCSP, City of Perris, and surrounding jurisdictions, if they have not already been expanded.

Cumulative impacts to potable water delivery and supply, wastewater conveyance and treatment capacity, stormwater drainage, electric power, natural gas, telecommunications, and solid waste generation and disposal could be significant if the providers of these utilities had not accounted for development of the Project site and its effect on their projections to meet customer demands. These cumulative effects include insufficient water supply, insufficient wastewater treatment capacity, impairment of solid waste reduction goals and construction of utilities that would cause significant environmental effects. The proposed Project, including the other planned developments in the PVCCSP, would be conditioned to construct the off-site and on-site infrastructure consistent with the overall development envisioned by the PVCCSP and in consultation with the utility providers to ensure each project can receive service. The utility providers for the PVCCSP have accounted for development of the PVCCSP area and the Project in their respective planning documents, including the EMWD's 2020 UWMP, the EMWD's 2015 Wastewater Collection System Master Plan Update, the RCFCWCD's Perris Valley Master Drainage Plan (MDP), and the City of Perris' solid waste reduction policies in conjunction with Riverside County's responsibility to ensure sufficient landfill capacity for countywide buildout. At such time that these providers undertake expansion projects, they will make their own CEQA determinations.

The cumulative growth from the PVCCSP, including the Project, has been addressed in the Perris GP 2030 EIR. Regarding water and wastewater utilities, the PVCCSP EIR determined that there is adequate existing capacity to provide water and sewer service to the PVCC project and project-related contribution to impacts related to the construction of new water or wastewater treatment facilities or the expansion of existing water and wastewater facilities would not be cumulatively considerable and is less than significant. The Project requires a short connection to an existing water pipeline and an extension of wastewater pipelines in roadways. The environmental impacts of constructing these facilities, and all off-site utilities, have been addressed throughout this DEIR and will be less than significant with mitigation. Therefore, the Project will not have cumulatively considerable impacts related to the construction of water and wastewater facilities.

The sufficiency of water supplies available to serve the Project in addition to the supplies required for the cumulative development within the EMWD's service area is analyzed every five years in the EMWD's UWMP. Pursuant to the Water Code, the UWMP makes a minimum 20-year projection of water demands and water supplies in the service area. According to the WSA prepared by the EMWD for the Project, the water demand of the Project has been accounted for in the 2020 UWMP demand

projections including demand projections for normal years and drought years up to a five dry year period. Because the EMWD determined in its 2020 UWMP that supplies will be sufficient to meet water demands in all year types through 2040, the Project will not have cumulatively considerable impacts to water supplies.

The sufficiency of wastewater treatment capacity for the Project and for the cumulative development in the tributary area of the Perris Valley RWRF is analyzed in the EMWD's 2015 Wastewater Collection System Master Plan. Because the EMWD accounted for the wastewater generation of the tributary area to the Perris Valley RWRF, which includes the PVCCSP and the Project with similar or more intense land use designations than those proposed, the Project will not have cumulatively considerable impacts to wastewater treatment capacity.

Regarding drainage, cumulative development, and changes in land use in the San Jacinto River Watershed will increase the area of impervious surface, which increases flow rates and results in higher concentrations of pollutants in stormwater. The PVCCSP EIR determined that storm water runoff from the PVCCSP would not exceed the capacity of existing or planned storm water drainage systems and potential impacts related to existing or planned storm water drainage systems are therefore less than significant (City of Perris 2011). Furthermore, construction of the storm water drainage facilities associated with the Project would not cause significant environmental effects beyond those discussed in the PVCCSP EIR (City of Perris 2011). The Project requires several on-site and off-site drainage facilities. Because the PVCCSP EIR determined the PVCCSP will not have cumulatively considerable impacts related to drainage systems, the Project's proposed drainage facilities which are consistent with the local Master Drainage Plan will also not be cumulatively considerable.

The project would make connections to the existing electricity, natural gas, and telecommunications networks. SCE would be the electricity provider, SoCal Gas would be the natural gas provider, and Frontier Communications would be the telecommunication provider for the Project. Future public and private development projects within the City, including those within the PVCCSP and the proposed Project, would increase the number of connections to these utilities which would result in an increased demand for electricity, natural gas, and telecommunications. Traditionally, these utilities are installed or upgraded by the appropriate service providers as new developments are built and installation is supported by the service fees customers pay to have these services. According to the Perris GP 2030 EIR, "both SoCal Gas and SCE indicated that, as reactive providers, which supply services to customers at their request they would be able to service future developments under General Plan 2030 build-out within the City, in combination with all projected future developments within their service boundaries" (City of Perris 2005). Therefore, for the reasons stated above, the Project will not have cumulatively considerable impacts related to dry utilities.

The solid waste collection and disposal provider would be CR&R Waste Services through a contract with the City. CR&R disposes waste from the City at either the Badlands Landfill or El Sobrante Landfill. These solid waste facilities are currently projected to remain open and have sufficient daily capacity to handle solid waste from the Project and other cumulative developments. As stated in the PVCCSP EIR, "With planned expansion activities of County landfills and projected growth rates contained within a Landfill System Capacity Projection Study (August 2001) prepared for the County, the Riverside County Integrated Project Final EIR concluded sufficient landfill capacity would exist to accommodate future disposal needs through County buildout in 2040" (City of Perris 2011). All development projects in the PVCCSP and City are required to comply with regulations to reduce solid waste. Therefore, for the

reasons stated above, the Project would not have a cumulatively considerable contribution to solid waste disposal capacity and compliance with regulations addressing the reduction of solid waste.

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5.0 ALTERNATIVES

5.1 INTRODUCTION

An EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment. In compliance with Section 15126.6(a) of the State CEQA Guidelines, an EIR must “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 significant effects of the project and evaluate the comparative merits of the alternatives.” The City of Perris, as the CEQA lead agency, is responsible for selecting a range of project alternatives. This section identifies potential alternatives to the proposed Project and evaluates them, as required by CEQA.

Key provisions of the State CEQA Guidelines on alternatives (Sections 15126.6[b]–15126.6[f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in an EIR.

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 objective or would be more costly” (Section 15126.6[b]).
2. “The specific alternative of ‘no project’ shall also be evaluated along with its impact” (Section 15126.6[e][1]).
3. “The ‘no project’ analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives” (Section 15126.6[e][2]).
4. “The range of alternatives required in an EIR is governed by the ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent)” (Section 15126.6[f]).

5. For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (Section 15126.6[f][2][A]).
6. “If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given locations” (Section 15126.6[f][2][B]).
7. “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (Section 15126.6[f][3]).

Pursuant to the guidelines stated above, a range of alternatives to the Project is considered and evaluated in this EIR. These alternatives were developed during project planning and environmental review. The discussion in this section provides the following:

- A description of alternatives considered;
- A comparative analysis of the alternatives under consideration and the Project. The focus of this analysis is to determine if alternatives can eliminate or reducing the significant environmental effects of the Project to a less than significant level; and
- An analysis of whether the alternatives meet most of the objectives of the Project.

5.1.1 Summary of the Project

The proposed Project involves the construction and operation of a non-refrigerated warehouse building with ancillary office uses on approximately 36 acres and involves future development of commercial retail/restaurant uses within two separate portions of the Project site including an approximately 4.7-acre portion to the south of the warehouse building and a 4.8-acre portion to the west of the warehouse building. The proposed warehouse building would be located in the central portion of the Project site and would include 774,419 total square feet of a high-cube fulfillment center warehouse building, which would also include up to 20,000 square feet of planned ancillary office area. The building would have a maximum structural height of 50 feet. The warehouse is assumed to be non-refrigerated. The future southern commercial development would include approximately 45,000 square feet of retail and restaurant uses comprised of 21,825 square feet of strip retail plaza use, a 5,000-square-foot high turnover (sit-down) restaurant, 14,775 square feet of fast-food restaurant without drive-through window use in line with retail use, and a 3,400-square-foot fast-food restaurant with drive-thru window use. The future western commercial development would include approximately 25,000 square feet of retail and restaurant uses comprised of 18,000 square feet of strip retail/restaurant use and two fast-food restaurants with drive-through window totaling 4,000 square feet and 3,000 square feet, respectively. The commercial buildings would have a maximum building height of 45 feet.

5.1.2 Project Objectives

The Applicant’s fundamental purpose and goal of the Project is to provide an industrial warehouse building in the northern portion of the City of Perris, near designated truck routes, and to increase

employment opportunities in a housing rich area. An additional goal is to provide a variety of commercial uses along Ramona Expressway to further reduce the necessity for driving when services are provided close by the employment center as envisioned by the City of Perris. The Project would achieve its underlying purpose and goals through the following objectives:

1. Provide an attractive mixed-use retail project along the Ramona Expressway that enhances and meets the local demand for the availability of social gathering places, retail services, and eateries in an underserved area of the Perris Valley Commerce Center Specific Plan (PVCCSP), thereby providing additional job opportunities in a housing-rich area and providing more equal jobs to housing balance.
2. Setting aside additional land for future commercial, retail, and office opportunities in the fast-growing Perris Boulevard Corridor to further enhance job opportunities, local services, and retail, commercial uses in an area that is housing rich but underserved in these areas.
3. Maximize the development of Class A speculative high cube warehouse industrial buildings that meet contemporary industry standards for operational design criteria, can accommodate a wide variety of users, and are economically competitive with similar warehouse buildings in the local area and region, which will assist the City of Perris in competing economically on a domestic and international scale through the efficient and cost-effective movement of goods.
4. Maximize industrial warehouse development in close proximity to designated truck routes and the State highway system to avoid or shorten truck-trip lengths on other roadways and avoid locating industrial warehouse buildings in proximity to residential uses.
5. Implement drainage improvements in conjunction with the Project to accommodate the 100-year storm flows in the area, including a public storm drain conveyance that would ultimately capture stormwater runoff from the region to the detention basin east of the project site, thus solving regional flooding problems.
6. Accommodate new development in a phased, orderly manner that is coordinated with the provision of necessary infrastructure and public improvements.

Provide for uses that will generate tax revenue for the City of Perris, including, but not limited to, increased property and sales tax, to support the City's ongoing municipal operations.

5.1.3 Summary of Proposed Project Significant And Unavoidable Impacts

The analysis in Section 4.0 of this EIR concludes that, despite implementation of mitigation measures, significant environmental impacts would result from the construction and operation of the Project. As previously mentioned, an EIR should consider a range of feasible alternatives that would attain most of the Project objectives, listed above, while reducing one or more of the significant and unavoidable impacts of the Project. Significant and unavoidable impacts that would result from implementation of the Project include those listed below.

- **Project and Cumulative Considerable Increase in Criteria Pollutant during Operation:** As discussed in Section 4.2, Air Quality, of this EIR, the proposed Project has the potential to result in cumulative impacts associated with on-going operations for emissions of volatile organic compounds (VOC), nitrogen oxides (NO_x), and carbon monoxide (CO). The operational emissions

are primarily associated with vehicle emissions. The City of Perris or the Project Applicant do not have regulatory authority to control tailpipe emissions; therefore, no feasible mitigation beyond the measures identified in the EIR exist that would reduce VOC and NO_x emissions to levels below the regional thresholds of significance established by the South Coast Air Quality Management District (SCAQMD). Therefore, operation of the Project would result in a significant and unavoidable cumulatively considerable net increase of a criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.

- **Project and Cumulative Greenhouse Gas Emissions:** As discussed in Section 4.7, Greenhouse Gas Emissions, of this EIR, the Project's GHG emissions would exceed the threshold of 3,000 metric tons (MT) of carbon dioxide equivalents per year (CO₂e/yr) used for this analysis. Additionally, the total GHG emissions would exceed the SCAQMD interim significance threshold of 10,000 MT CO₂e/yr for industrial projects. There are no additional feasible mitigation measures beyond those identified in the EIR that would reduce the Project's GHG emissions to a less than significant level. Therefore, the proposed Project would have the potential to result in cumulatively significant and unavoidable impacts with respect to GHG emissions.

5.2 ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD FOR FURTHER ANALYSIS

Section 15126.6(c) of the State CEQA Guidelines specifies that an EIR should: (1) identify alternatives that were considered by the lead agency but were rejected because they were determined to be infeasible during the scoping process, and (2) briefly explain the reasons underlying the lead agency's determination. This section of the State CEQA Guidelines states "Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives; (ii) infeasibility; or (iii) inability to avoid significant environmental impacts.

The following alternative was considered during the scoping and planning process but was not selected for detailed analysis in this EIR. As described in greater detail below, the main reason for rejecting this alternative was that it would not avoid or substantially reduce significant impacts associated with the Project and would not be consistent with the Project objectives.

5.2.1 Alternative Site

CEQA requires that the discussion of alternatives focus on alternatives to the Project or its location, which are capable of avoiding or substantially lessening any significant effects of the Project. The key question and first step in the analysis is determining whether any of the significant effects of the Project would be avoided or substantially lessened by developing the Project at another location. Only locations that would avoid or substantially lessen any of the significant effects of the Project need be considered for inclusion in the EIR (State CEQA Guidelines, Section 15126.6[f][2][B]).

To meet a key Project objective to provide an attractive mixed use retail project along Ramona Expressway that enhances and meets the local demand for the availability of social gathering places, retail services, and eateries in an underserved area of the PVCCSP, the alternative site must be located within the PVCCSP planning area. Sites designated for Commercial and Light Industrial development within the PVCCSP planning area are limited. The sites designated for Commercial and Light Industrial uses along Ramona Expressway include currently developed sites and vacant land, and sites that are

currently subject to separate development applications. Additionally, if removal of existing uses was required to implement the Project at an alternative site, construction-related impacts (including air quality emissions) would be greater than the Project since the Project site is currently undeveloped, and no demolition would be necessary.

Development of an industrial warehouse and commercial retail/restaurant uses similar to the size proposed by the Project at other sites within PVCCSP planning area would be expected to have similar significant and unavoidable impacts as the Project related to cumulatively considerable regional air quality impacts during operation and cumulatively considerable GHG emissions impacts. Therefore, development of the Project at an alternative site within the PVCCSP planning area would not avoid the direct and cumulatively considerable impacts of the Project related to air quality and GHG emissions.

As identified in the analysis presented in Section 4 of this EIR, with incorporation of PVCCSP Standards and Guidelines, PVCCSP EIR mitigation measures, regulatory requirements and Project-level mitigation measures, the Project would result in less than significant impacts or less than significant impacts with mitigation for construction-related, operational, and cumulative impacts related to aesthetics, biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, transportation, tribal cultural resources, and utilities and services systems. Under this alternative, impacts associated with these topics would be similar to the Project, depending on the characteristics of that particular alternative site, because development of the Project at an alternative site would have a similar construction impact area, type of uses, and project size and would be subject to the same regulatory requirements, PVCCSP Standards and Guidelines, and mitigation measures.

Additionally, the Project Applicant does not own any other land in the PVCCSP planning area that would accommodate the Project and meet the Project objectives. CEQA does not require the consideration of sites not owned by the landowner or which could not be reasonably acquired by the landowner as alternatives to the proposed Project (State CEQA Guidelines, Section 15126.6[f][1]).

In summary, development of the proposed Project at an alternative site within the PVCCSP planning area along Ramona Expressway would likely meet the Project objectives, with the exception of setting aside additional land for future commercial, retail, and office opportunities in the fast-growing Perris Boulevard Corridor, and implementation of storm drain infrastructure to address current flooding issues in this area. However, development of the proposed Project at an alternative site would not substantially reduce or avoid significant unavoidable impacts related to cumulative air quality and GHG emissions that would result from the Project. Therefore, further analysis of an alternative site(s) in this EIR is not required.

5.3 ALTERNATIVES ANALYSIS

Based on the criteria listed previously, the alternatives described below have been determined to represent a reasonable range of alternatives. As described in Sections 4.1 through 4.14 of this EIR, the potentially significant impacts of the Project can be mitigated to a less than significant level with the exception of cumulative air quality impacts during operation and cumulative GHG emissions impacts.

For the two “build” alternatives below (Alternatives 2 and 3), it is assumed that the PVCCSP Standards and Guidelines, PVCCSP EIR mitigation measures, and Project-specific mitigation measures identified for

the Project would also be implemented with the alternative, and thus serve to reduce or avoid potential significant impacts similar to the Project.

The alternatives considered in this EIR include the following:

- Alternative 1 – No Project/No Development
- Alternative 2 – No Project–All Commercial Development
- Alternative 3 – Reduced Industrial
- Alternative 4 – Reduced Commercial

5.3.1 No Project/No Development Alternative

Section 15126.6(e) of the State CEQA Guidelines requires that an EIR evaluate a “no project” alternative to allow decision makers to compare the impacts of approving a project with the impacts of not approving that project. Section 15126.6(e)(3) of the State CEQA Guidelines describes the two general types of no project alternatives: (a) when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the no project alternative would be the continuation of that plan; and (b) when the project is other than a land use/regulatory plan (such as a specific development on an identifiable property), the no project alternative is the circumstance under which the project does not proceed. Alternative 1 represents the No Project/No Development Alternative where the Project and associated site improvements would not proceed, and the Project site would remain undeveloped.

Description of the Alternative

Under the No Project/No Development Alternative, the proposed development of a warehouse building, commercial retail/restaurant uses, and associated parking, access driveways, utilities, and landscaping would not occur. The Project site would remain in its current condition and remain vacant.

Comparative Analysis of Environmental Impacts

Aesthetics

Section 4.1, Aesthetics, of this EIR, concluded that the Project would result in less than significant impacts to aesthetics with implementation of Project-specific mitigation. The No Project/No Development Alternative does not involve any development or change in the current condition of the Project site. There would be no change to the visual quality or character of the Project site or surrounding areas. Aesthetic changes associated with development of the Project site would not occur with this alternative.

Air Quality

Section 4.2, Air Quality, of this EIR, concluded that the Project would result in a significant and unavoidable increase in criteria pollutants during operational activity even with implementation of applicable PVCCSP EIR mitigation measures and Project-specific mitigation measures. Under the No Project/No Development Alternative, the Project would not be constructed and no air quality impacts would occur. The No Project/No Development Alternative would eliminate the significant and unavoidable impacts related to criteria pollutants that would be generated by Project operation.

Biological Resources

Section 4.3, Biological Resources, of this EIR, concluded that the Project would result in less than significant impacts with implementation Project-specific mitigation measures. Under the No Project/No Development Alternative, the Project would not be constructed, the Project site would be left in its existing condition, and no impacts to biological resources would occur.

Cultural Resources

There are no historic or known archeological resources located at the Project site. Section 4.4, Cultural Resources, of this EIR, concluded that the Project would result in less than significant impacts to cultural resources with implementation Project-specific mitigation measures. Under the No Project/No Development Alternative, the Project would not be constructed and no impacts to cultural resources would occur.

Energy

Section 4.5, Energy, of this EIR, concluded that the Project would result in less than significant impacts to energy with implementation of applicable PVCCSP EIR mitigation measures. Under the No Project/No Development Alternative, the Project would not be constructed and no energy impacts would occur.

Geology and Soils

Section 4.6, Geology and Soils, of this EIR, concluded that the Project would result in less than significant impacts to geology and soils – including paleontological resources – with implementation of applicable PVCCSP EIR mitigation measures, PVCCSP Standards and Guidelines relevant to geology and soils, and Project-specific mitigation. Under the No Project/No Development Alternative, the Project would not be constructed and no impacts would occur.

Greenhouse Gas Emissions

Section 4.7, Greenhouse Gases, of this EIR, concluded that the Project would result in significant and unavoidable GHG emission impacts even with implementation of applicable PVCCSP EIR mitigation measures and Project-specific mitigation measures. Under the No Project/No Development Alternative, the Project would not be constructed and no GHG impacts would occur. The No Project/No Development Alternative would eliminate the significant and unavoidable cumulative impacts related to GHG emissions that would be generated by the Project.

Hazards and Hazardous Materials

Section 4.7, Hazards and Hazardous Materials, of this EIR, concluded that the Project would result in less than significant impacts to hazards and hazardous materials with implementation of PVCCSP Standards and Guidelines relevant to hazards and hazardous materials. Project-specific mitigation is not required. Under the No Project/No Development Alternative, the Project would not be constructed and no impact related to hazards or hazardous materials would occur.

Hydrology and Water Quality

Section 4.8, Hydrology and Water Quality, of this EIR, concluded that the Project would result in less than significant impacts to hydrology and water quality with implementation of the PVCCSP Standards

and Guidelines relevant to hydrology and water quality. Project-specific mitigation is not required. Under the No Project/No Development Alternative, the Project would not be constructed and no hydrology and water quality impacts would occur.

Land Use and Planning

Section 4.10, Land Use and Planning, of this EIR, concluded that the Project would result in less than significant impacts land use and planning. Project-specific mitigation is not required.

Under the No Project/No Development Alternative, there would be no change in the existing or planned conditions at the Project site. The City of Perris General Plan land use designation for the Project site is “Specific Plan” for the PVCCSP planning area and the Project site is zoned “Commercial” for the PVCCSP planning area. Implementation of the No Project/No Development Alternative would not involve development pursuant to existing zoning and land use designations for future development and would not be consistent with goals and policies of the Land Use Element of the General Plan related to commerce and industry to provide jobs for residents at all economic levels.

Noise

Section 4.11, Noise, of this EIR, concluded that the Project would result in less than significant impacts to noise with implementation of applicable PVCCSP EIR mitigation measures and PVCCSP Standards and Guidelines relevant to noise. Under the No Project/No Development Alternative, the Project would not be constructed and no noise impacts would occur.

Transportation

Section 4.12, Transportation, of this EIR, concluded that the Project would result in less than significant impacts to transportation with implementation of applicable PVCCSP EIR mitigation measures and PVCCSP Standards and Guidelines relevant to transportation. Under the No Project/No Development Alternative, the Project would not be constructed and no transportation impacts would occur.

Tribal Cultural Resources

Section 4.13, Tribal Cultural Resources, of this EIR, concluded that the Project would result in less than significant impacts to tribal cultural resources with implementation of Project-level mitigation measures. Under the No Project/No Development Alternative, the Project would not be constructed and no impacts associated with tribal cultural resources would occur.

Utilities and Service Systems

Section 4.14, Utilities and Service Systems, of this EIR, concluded that the Project would result in less than significant impacts to utilities and service systems with implementation of applicable PVCCSP Standards and Guidelines relevant to utilities and service systems. Project-specific mitigation is not required. Under the No Project/No Development Alternative, the Project would not be constructed and no impact would occur.

Conclusions

Avoid or Substantially Lessen the Significant Impact of the Project

The No Project/No Development Alternative would avoid the significant and unavoidable operational and cumulative air quality and GHG emissions impacts of the Project. Additionally, because no development would occur under the No Project/No Development Alternative, the less than significant impacts resulting from the Project for the following environmental topics would be avoided: aesthetics, biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, transportation, tribal cultural resources, and utilities and service systems.

Attainment of Project Objectives

The No Project/No Development Alternative would not involve any development at the Project site. This alternative would not attain any of the Project Objectives identified above in Section 5.1.2.

5.3.2 No Project–All Commercial Development Alternative

Description of Alternative

The purpose of the No Project–All Commercial Development Alternative is to address significant and unavoidable impacts of the Project related to operational and cumulative air quality and GHG emissions through the removal of the warehouse building and the increase in commercial/retail space consistent with the existing PVCCSP designation for the Project site. Under this alternative, the warehouse building would not be built. The proposed commercial retail/restaurant use area, totaling 70,000 square feet with the Project would increase to 982,278 square feet. The commercial retail area would include 520,278 square feet of shopping space, 40,000 square feet of market space, 343,000 square feet of restaurant space, 55,000 square feet of fast-food space, a 6,000-square-foot gas station/convenience center, and an 18,000-square-foot gas station/convenience center/car wash. Under this alternative, the proposed commercial retail uses would be constructed within the entirety of the Project site and would be accessed from the primary arterials, as allowed by the City Engineer. Additionally, landscaping under this alternative would be consistent with City landscaping requirements for commercial uses.

The No Project–All Commercial Development Alternative would result in an increase in overall vehicle trip generation compared to the proposed Project. Trip generation rates for the proposed Project are provided in Table 4.12-2 of this EIR and trip generation estimates for this alternative are provided in Table 5-1. As shown in Table 5-1, the No Project–All Commercial Development Alternative would result in an increase in trip generation compared to the Project (35,138 daily trips compared to 9,266 daily trips with the Project). There would be 25,872 more daily trips under this alternative than the Project. This alternative would only generate retail trips; no industrial serving truck trips would be generated under this alternative.

Table 5-1
TRIP GENERATION SUMMARY – NO PROJECT – ALL COMMERCIAL DEVELOPMENT ALTERNATIVE

Land Use	Quantity	Units ¹	AM	Peak	Hour	PM	Peak	Hour	Daily
			In	Out	Total	In	Out	Total	
Actual Vehicles:									
Shopping Center	520.278	TSF	271	166	437	849	920	1,769	19,256
Internal Capture (NCHRP 684)			-39	-56	-95	-407	-246	-652	-7,102
Pass-by Reduction (PM/Daily =40%) ²			0	0	0	-177	-177	-354	-4,862
High-Turnover (Sit-Down) Restaurant	343.000	TSF	1,805	1,477	3,282	1,894	1,211	3,105	36,770
Internal Capture (NCHRP 684)			-68	-48	-116	-299	-495	-794	-9,404
Pass-by Reduction (PM/Daily=43%) ²			0	0	0	-308	-308	-616	-11,796
Fast-Food With Drive-Thru	55.000	TSF	1,251	1,202	2,453	945	872	1,817	25,712
Internal Capture (NCHRP 684)			-48	-33	-81	-209	-346	-555	-7,854
Pass-by Reduction (AM=50%; PM/Daily=55%) ²			-585	-585	-1,169	-289	-289	-579	-9,822
Gasoline/Service Station w/ Conven. Mkt. (9-15 VFP)	24.000	TSF	678	678	1,356	654	654	1,308	16,810
Internal Capture (NCHRP 684)			-34	-49	-83	-355	-214	-569	-7,320
Pass-by Reduction (AM-76%; PM/Daily=75%) ²			-478	-478	-956	-224	-224	-448	-7,118
Supermarket	40.000	TSF	67	47	114	179	179	358	3,754
Internal Capture (NCHRP 684)			-8	-11	-19	-79	-48	-127	-1,334
Pass-by Reduction (PM/Daily=24%) ²			0	0	0	-24	-31	-55	-581
Total Project Trips			2,812	2,310	5,123	2,150	1,457	3,607	35,138
From Traffic Study (Actual Vehicles)			635	399	1,035	349	374	723	9,266
Comparison to Traffic Study			2,177	1,911	4,088	1,801	1,083	2,884	25,872

Source: Urban Crossroads 2023

¹ TSF=thousand square feet

² Pass-by trip reduction source: Institute of Transportation Engineers (ITE), trip General Manual, Eleventh Edition (2021).

Comparative Analysis of Environmental Impacts

Aesthetics

Similar to the Project, development of the No Project–All Commercial Development Alternative would alter the existing visual character of the Project site through introduction of commercial retail/restaurant use areas on a previously vacant, undeveloped site. The No Project–All Commercial Development Alternative would comply with the Standards and Guidelines set forth in the PVCCSP, as described in Section 4.1, Aesthetics, including building orientation, screening, architecture, lighting, signage, walls/fences, and landscaping. The architectural design of the commercial retail buildings would be similar to the retail components of the Project described in Section 3.0 of this EIR. It is expected that the overall visual appearance under this alternative would alter the existing visual character of the site, similar to the Project. As with the Project, the development associated with the No Project–All Commercial Alternative would comply with County of Riverside Ordinance No. 655, which addresses

nighttime lighting that could affect the Palomar Observatory, and requirements set forth in the PVCCSP related to lighting and glare.

Section 4.1, Aesthetics, of this EIR, concluded that the Project would result in less than significant impact or no impact to aesthetics with implementation of Project-specific mitigation. With incorporation of the applicable PVCCSP Standards and Guidelines, and Project-specific mitigation, the No Project–All Commercial Alternative would have similar, less than significant impacts as the Project related to aesthetics.

Air Quality

Implementation of the No Project–All Commercial Development Alternative would have a similar construction impact area as the Project. Therefore, construction assumptions with respect to the intensity of construction would also be similar. Section 4.2, Air Quality, of this EIR, concluded that the Project would result in a less than significant impact to air quality associated with construction. The No Project–All Commercial Alternative would have similar, less than significant impacts as the Project related to air quality associated with construction.

With an increase in the commercial retail building square footage under this alternative, there would be a substantial increase in vehicle trip generation. The No Project–All Commercial Development Alternative would result in 35,138 daily trips compared to 9,266 daily trips with the Project. This alternative would only generate retail trips. With an increased number of vehicle trips from the increased commercial retail building square footage, it is assumed that operational emissions of VOC, NO_x, and CO would be similar or increased as compared to the Project. With a projected increase in operational emissions, the SCAQMD thresholds of significance would also be exceeded under this alternative. Therefore, this alternative would result in significant and unavoidable operational air quality impacts, consistent with the Project.

Biological Resources

Section 4.3, Biological Resources, of this EIR, concluded that the Project would result in less than significant impacts to biological resources with implementation of Project-specific mitigation measures. The No Project–All Commercial Development Alternative would involve a similar construction impact area as the Project. Therefore, this alternative would result in similar impacts to biological resources (including potential impacts to nesting birds, burrowing owl, and fairy shrimp species) as the Project. With incorporation of Project-specific mitigation measures, the No Project–All Commercial Development Alternative would have similar, less than significant impacts as the Project related to biological resources.

Cultural Resources

Section 4.4, Cultural Resources, of this EIR, concluded that the Project would result in less than significant impacts to cultural resources with implementation of Project-specific mitigation measures. The No Project–All Commercial Development Alternative would involve a similar construction impact area as the Project. Therefore, similar to the Project, this alternative would not impact historic or known cultural resources at the Project site. With incorporation of Project-specific mitigation measures, the No Project–All Commercial Development Alternative would have similar, less than significant impacts as the Project related to cultural resources.

Energy

Implementation of the No Project–All Commercial Alternative would result in similar energy demand during construction compared to the Project because of the removal of the industrial building and the increase in commercial retail square footage. The No Project–All Commercial Development Alternative would involve the removal of the warehouse building and would increase the commercial/retail space from 70,000 square feet to 982,278 square feet. It is assumed that this alternative would result in similar energy demand during operational activities due to a reduction in the warehouse square footage and an increase in commercial/retail square footage. Therefore, this alternative would result in similar energy impacts as compared to the Project.

Section 4.5, Energy, of this EIR, concluded that the Project would result in less than significant impacts to energy with implementation of applicable PVCCSP EIR mitigation measures. The No Project–All Commercial Development Alternative would result in similar energy impacts as compared to the Project, and with incorporation of applicable PVCCSP EIR mitigation measures, this alternative would have similar, less than significant impacts as the Project related to energy.

Geology and Soils

Section 4.6, Geology and Soils, of this EIR, concluded that the Project would result in a less than significant impact or no impact to geology and soils with implementation of applicable PVCCSP EIR mitigation measures, PVCCSP Standards and Guidelines relevant to geology and soils, and Project-specific mitigation. The No Project–All Commercial Development Alternative would involve a similar construction impact area. Therefore, this alternative would result in similar potential impacts related to geology and soils as the Project. With adherence to applicable building codes and incorporation of the recommendations from the site-specific geotechnical studies, the Project, and the No Development – All Commercial Development Alternative would not expose people or structures to substantial safety risks associated with geologic hazards. Further, because the construction impact area would be similar to the Project, this alternative would also have the potential to impact subsurface paleontological resources and the impact would be reduced to a less than significant level with mitigation.

Greenhouse Gas Emissions

Section 4.7, Greenhouse Gas Emissions, of this EIR, concluded that the Project would result in significant and unavoidable impacts to GHG emissions with implementation of applicable PVCCSP EIR mitigation measures and Project-specific mitigation measures. Implementation of the No Project–All Commercial Development Alternative would result in similar construction activities and associated GHG emissions as the Project. This alternative would include the removal of the warehouse building and would increase the commercial/retail space. The No Project–All Commercial Development Alternative would result in 35,138 daily trips compared to 9,266 daily trips with the Project. This alternative would only generate retail trips; no industrial/truck trips would be generated under this alternative. With an increase in the number of retail trips and a reduction in industrial trips, it is assumed that the 3,000 MT CO₂e/yr threshold of significance would still be exceeded under this alternative. Therefore, this alternative would result in significant and unavoidable GHG emissions impacts, similar to the Project.

Hazards and Hazardous Materials

Neither implementation of the No Project–All Commercial Development Alternative nor the Project would result in a significant impact related to hazards or hazardous materials. Based on the location and

condition of the Project site, the No Project–All Commercial Development Alternative and the Project would have no impact associated with location on a hazardous materials site, or wildland fire. As with the Project, uses anticipated under this alternative would not result in hazardous emissions. Land uses that would occur onsite under the No Project–All Commercial Development Alternative would have a similar potential to handle and store hazardous materials as the Project, and similar impacts related to hazards associated with the March Air Reserve Base/Inland Port Airport (MARB/IPA), and emergency response/evacuation.

Section 4.7, Hazards and Hazardous Materials, of this EIR, concluded the Project would result in less than significant impacts to hazards and hazardous materials, with implementation of PVCCSP Standards and Guidelines relevant to hazards and hazardous materials. Project-specific mitigation is not required. The No Project–All Commercial Development Alternative would have similar, less than significant impacts as the Project related to hazards and hazardous materials.

Hydrology and Water Quality

The No Project–All Commercial Development Alternative would involve a similar construction impact area. Therefore, this alternative would result in similar impacts related to hydrology and water quality as the Project. Similar to the Project, development under this alternative would increase the amount of storm water runoff and alter existing drainage patterns due to the increase in the amount of impervious surface. As with the Project, application of BMPs and other regulatory requirements would ensure that impacts to hydrology and storm drain infrastructure are less than significant.

As with the Project, the No Project–All Commercial Development Alternative would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. The Project and this alternative would implement design features and BMPs such as the use of landscaping to facilitate some groundwater recharge and percolation. As with the Project, the No Project–All Commercial Development Alternative would rely on domestic water supply from the Eastern Municipal Water District (EMWD).

As with the Project, the No Project–All Commercial Development Alternative would result in surface runoff after Project implementation. Surface runoff from a developed condition (with either this alternative or the Project) would have a different composition in comparison to the existing condition, which is undeveloped. This runoff is likely to include a similar amount and type of pollutants commonly found in urban runoff. As required under the National Pollutant Discharge Elimination System (NPDES), a Stormwater Pollution Prevention Plan (SWPPP) would be created specifically for construction of the Project and this alternative. The Project and this alternative would be required to comply with applicable regulations related to water quality, including, but not limited to the MS4 and NPDES permit requirements, which would minimize potential short-term, construction-related, and long-term, operational water quality impacts.

Section 4.8, Hydrology and Water Quality, of this EIR, concluded that the Project would result in a less than significant impact or no impact to hydrology and water quality with implementation of PVCCSP Standards and Guidelines relevant to hydrology and water quality. Project-specific mitigation is not required. The No Project–All Commercial Development Alternative would have similar, less than significant impacts as the Project related to water quality during construction and operation.

Land Use and Planning

The City of Perris General Plan land use designation for the Project site is “Specific Plan” for the PVCCSP planning area and the Project site is zoned “Commercial” by the PVCCSP. The PVCCSP serves as the regulatory document for future development within the PVCCSP planning area. Section 4.10, Land Use and Planning, of this EIR, concluded that the Project would be consistent with the previously analyzed PVCCSP aside from the Specific Plan Amendment that is required to change a portion of the site’s Commercial zoning to Light Industrial, which includes warehouse facilities as a permitted use. The No Project–All Commercial Development Alternative would result in the development of a commercial retail/restaurant use project and would not require an amendment to the PVCCSP to change the zoning from Commercial use to Light Industrial. The No Project–All Commercial Development Alternative would be developed in compliance with the relevant Standards and Guidelines outlined in the PVCCSP and would not result in significant land use impacts, as with the Project. The No Project–All Commercial Development Alternative and the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Section 4.10, Land Use and Planning, of this EIR, concluded that the Project would result in less than significant impacts to land use and planning. Project-specific mitigation is not required. The No Project–All Commercial Development Alternative would have similar, less than significant impacts as the Project related to land use and planning.

Noise

The No Project–All Commercial Development Alternative would involve a similar construction impact area to the Project. Therefore, construction of this alternative would result in similar noise impacts as the Project. Section 4.11, Noise, of this EIR, concluded the Project would result in less than significant impacts to noise with implementation of applicable PVCCSP EIR mitigation measures. Under the No Project–All Commercial Development Alternative, construction noise impacts would be less than significant, similar to the Project.

The No Project–All Commercial Development Alternative would include all commercial retail operations onsite, such as a shopping center, a market, a sit-down restaurant, a fast-food restaurant with drive-thru, a gas station/convenience store, and a gas station/convenience store/car wash. The No Project–All Commercial Alternative would generate approximately 35,138 daily trips compared to 9,266 daily trips with the Project. Notably, the volume of retail cars entering the strip retail, sit-down restaurants, and fast food with and without drive-thru would increase. This alternative would not generate any industrial/truck trips as this alternative would remove the industrial building, thereby reducing off-site noise levels from industrial/truck trips.

However, with the addition of a car wash, this alternative may generate greater operational noise impacts as compared to the Project. Additionally, as the total number of daily trips would increase, there would be a potential increase in operational noise impacting nearby sensitive noise receivers under this alternative. If this alternative were to be selected, prior to operation of the gas station/convenience store/car wash, the project applicant would be required to show compliance with the City noise limits established at the property lines pursuant to the City noise ordinance. As with the Project, the No Project–All Commercial Development Alternative would not be subjected to substantial noise levels from MARB/IPA operations.

Section 4.11, Noise, of this EIR, concluded that the Project would result in a less than significant impact to operational noise levels. With the increase in commercial/retail space, including the addition of a car wash, it is anticipated the No Project–All Commercial Development Alternative may have a greater impact than the Project with regard to operational noise. By showing compliance with City noise limits prior to operation, impacts would be less than significant, similar to the Project.

Transportation

The No Project–All Commercial Development Alternative would result in 35,138 daily trips compared to 9,266 daily trips with the Project. This alternative would only generate retail trips; no industrial/truck trips would be generated under this alternative. As with the Project, the No Project–All Commercial Development Alternative would meet two of the screening criteria identified in the Perris Traffic Impact Analysis Guidelines: being with one-half a mile of qualifying transit and being located within a low vehicles miles traveled (VMT) area. It is also assumed that each commercial retail building under this alternative would remain under the 50,000 square feet limit of local-serving retail, as defined by the City. However, if a future proposal were to apply for a building larger than 50,000 square feet, then this alternative could result in a greater VMT impact as compared to the Project.

Based on the fact that the No Project–All Commercial Development Alternative meets two of the screening criteria identified in the City of Perris Traffic Impact Analysis Guidelines, and with the assumption the retail buildings would not exceed 50,000 square feet limit, a VMT study is not required, and impacts related to VMT would be less than significant.

As with the Project, the No Project–All Commercial Development Alternative would not conflict with regional or local programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact would be less than significant. As with the Project, this alternative would incorporate applicable PVCCSP Standards and Guidelines, PVCCSP EIR mitigation measures, and Project design features. The No Project–All Commercial Development Alternative and the Project would not conflict with applicable programs, plans, ordinances, or policies addressing the circulation system; would not create hazards through design; and would not result in inadequate emergency access. As with the Project, these transportation impacts would be less than significant.

Tribal Cultural Resources

The No Project–All Commercial Development Alternative would involve a similar construction impact area as the Project. Although there are no known tribal cultural resources within the Project site, this alternative would result in similar potential impacts to tribal cultural resources within the Project site as the Project, should they be present.

Section 4.13, Tribal Cultural Resources, of this EIR, concluded that the Project would result in a less than significant impact to tribal cultural resources with implementation of Project-level mitigation measures. With incorporation of Project-specific mitigation measures, the No Project–All Commercial Development Alternative would have similar, less than significant impacts as the Project related to tribal cultural resources.

Utilities and Service Systems

As with the Project, the No Project–All Commercial Development Alternative would increase the water demand, wastewater generation, and electric demand at the Project site compared to existing conditions where the site is undeveloped. Additionally, as discussed above under *Hydrology and Water Quality*, the No Project–All Commercial Development Alternative would involve development of a similar area that would occur with implementation of the Project and would generate a similar amount of storm water runoff. Although the industrial building would be removed and the commercial retail area would be increased, the overall utility infrastructure needed to serve the No Project–All Commercial Development Alternative would be similar as the Project and would be located within a similar construction impact area.

As discussed in Section 4.14, Utilities and Service Systems, of this EIR, a Project-specific Water Supply Assessment (WSA) was prepared for the Project. The EMWD estimates the annual water demand for the Project to be approximately 48.30 AFY; however, with the removal of the industrial building and the increase in commercial retail square footage, it is expected the total water consumption and associated wastewater generation would be similar under the No Project–All Commercial Development Alternative. In the EMWD's 2020 Urban Water Management Plan (UWMP), the demand projections for the parcels covering the Project site were estimated based on Commercial Retail land use, with a total demand of approximately 119.08 AFY. Accordingly, the water demand for the Project and the No Project–All Commercial Development Alternative would be less than that estimated in the EMWD 2020 UWMP for the Project site, and the EMWD would have sufficient water supplies to serve uses under this alternative and the Project, resulting in a less than significant impact. Similarly, the wastewater generated from the Project represents approximately 0.03 percent of the current daily treatment capacity of the Perris Valley Regional Wastewater Reclamation Facility (RWRF). As the wastewater generation for this alternative is assumed to be similar to the Project, there would be adequate capacity in EMWD wastewater treatment facilities to treat wastewater generated. The No Project–All Commercial Development Alternative and the Project would have less than significant impacts related to water supply and wastewater treatment.

As with the Project, construction, and operation of commercial retail uses under the No Project–All Commercial Development Alternative would comply with applicable local and State regulations related to solid waste management and diversion of solid waste from landfills. The No Project–All Commercial Development Alternative and Project would have less than significant impacts related to solid waste.

Conclusions

Avoid or Substantially Lessen the Significant Impact of the Project

The No Project–All Commercial Development Alternative would involve the removal of the warehouse building and would increase the commercial/retail space. The No Project–All Commercial Development Alternative would result in an increase in trip generation (35,138 daily trips compared to 9,266 daily trips with the Project). There would be 25,872 more daily trips under this alternative than the Project. This alternative only generates retail trips; no industrial trips would be generated under this alternative. Therefore, significant, and unavoidable impacts associated with operational criteria pollutant emissions (air quality impacts) and GHG emissions would be similar to the Project under this alternative. With the addition of a car wash and with the increase in total daily trips, this alternative may have a greater impact than the Project with regard to operational noise. If this alternative were to be selected, prior to operation of the gas station/convenience store/car wash, the project applicant would be required to

show compliance with the City noise limits established at the property lines per the City noise ordinance. For all other topical areas, similar impact levels would occur with the No Project–All Commercial Alternative as compared to the Project.

Attainment of Project Objectives

Following is a discussion of the All Commercial Development Alternative’s ability to attain the Project Objectives:

- 1. Provide an attractive mixed use retail project along the Ramona Expressway that enhances and meets the local demand for the availability of social gathering places, retail services, and eateries in an underserved area of the Perris Valley Commerce Center Specific Plan, thereby providing additional job opportunities in a housing-rich area and providing more equal jobs to housing balance.**

The No Project–All Commercial Development Alternative would remove the warehouse building and would increase the square footage of the commercial retail/restaurant use area. Therefore, the No Project–All Commercial Development Alternative would attain this objective.

- 2. Setting aside additional land for future commercial, retail, and office opportunities in the fast-growing Perris Blvd Corridor to further enhance job opportunities, local services, and retail, commercial uses in an area that is housing rich but underserved in these areas.**

The No Project–All Commercial Development Alternative would remove the warehouse building and would increase the square footage of the commercial retail/restaurant use area. Therefore, the No Project–All Commercial Development Alternative would attain this objective.

- 3. Maximize the development of Class A speculative high cube warehouse industrial buildings that meet contemporary industry standards for operational design criteria, can accommodate a wide variety of users, and are economically competitive with similar warehouse buildings in the local area and region, which will assist the City of Perris in competing economically on a domestic and international scale through the efficient and cost-effective movement of goods.**

The No Project–All Commercial Development Alternative would remove the industrial building, and thus would not maximize industrial development at the Project site. Therefore, the No Project–All Commercial Development Alternative would not achieve this objective.

- 4. Maximize industrial warehouse development in close proximity to designated truck routes and the State highway system in order to avoid or shorten truck-trip lengths on other roadways and avoid locating industrial warehouse buildings in proximity to residential uses.**

The No Project–All Commercial Development Alternative would remove the industrial building, and thus would not maximize industrial development at the Project site. Therefore, the No Project–All Commercial Development Alternative would not achieve this objective.

- 5. Implement drainage improvements in conjunction with the Project to accommodate the 100-year storm flows in the area, including a public storm drain conveyance that would ultimately capture stormwater runoff from the region to the detention basin east of the project site, thus solving regional flooding problems.**

The No Project–All Commercial Development Alternative would attain this objective.

6. Accommodate new development in a phased, orderly manner that is coordinated with the provision of necessary infrastructure and public improvements.

The No Project–All Commercial Development Alternative would attain this objective.

7. Provide for uses that will generate tax revenue for the City of Perris, including, but not limited to, increased property and sales tax, in order to support the City's ongoing municipal operations.

The No Project–All Commercial Development Alternative would remove the warehouse building and would increase the square footage of the commercial retail/restaurant use area. Therefore, the Reduced Industrial Alternative may achieve this objective as effectively as the Project.

5.3.3 Reduced Industrial Alternative

Description of Alternative

The purpose of the Reduced Industrial Alternative is to address significant and unavoidable impacts of the Project related to operational and cumulative air quality and GHG emissions through a reduction in the warehouse building square footage on the industrial site. Under this alternative, the warehouse building would be reduced by approximately 20 percent from 774,419 square feet to approximately 620,000 square feet, a reduction of approximately 154,419 square feet. Under this alternative, the assumptions regarding the warehouse being non-refrigerated would remain the same. The proposed commercial retail/restaurant use areas to the south and to the west, totaling 70,000 square feet would remain as proposed. As outlined in Section 3.0, Project Description, of this EIR, landscaping would be provided along the entire site perimeter of both the warehouse and commercial retail/restaurant use portions of the Project site, within the automobile parking areas for visual quality and shading, and at select building-adjacent locations. Approximately 13.7 percent of the warehouse portion of the Project site would be landscaped. Under this alternative, the proposed landscaping plan would remain in similar condition as the Project.

Additionally, under this alternative, trucks and vehicles would enter and exit the industrial and commercial retail/restaurant use areas from similar streets as proposed under the Project. As outlined in Section 3.0, Project Description, of this EIR, the Project would provide three automobile access driveways off Perris Boulevard with right-in/right-out access only (one for warehouse access and two for access to the 4.8-acre future western retail component), and three truck and automobile access driveways off Perry Street with left-in/right-out access only for trucks and no turn restrictions for automobiles. The southern retail component would have one right-in/right-out access driveway and one full signalized access driveway on Ramona Expressway. This alternative would also include similar proposed improvements to drainage, roads, and utilities, as identified under the Project. The only change under this alternative is a reduction in the warehouse building square footage.

The Reduced Industrial Alternative would result in a reduction in overall trip generation compared to the Project. Trip generation rates for the proposed Project are provided in Table 4.12-2 of this EIR and trip generation estimates for this alternative are provided in Table 5-2. As shown in Table 5-2, the Reduced Industrial Alternative would result in a reduction in trip generation compared to the Project (8,938 daily trips compared to 9,266 daily trips with the Project). There would be 328 less daily trips under this alternative than the Project (58 less industrial truck trips and 270 less industrial car trips).

Table 5-2
TRIP GENERATION SUMMARY - REDUCED INDUSTRIAL ALTERNATIVE

Land Use	Quantity	Units ¹	AM	Peak	Hour	PM	Peak	Hour	Daily
			In	Out	Total	In	Out	Total	
Actual Vehicles: High-Cube Fulfillment	620.000	TSF							
Passenger Cars:			49	15	64	25	64	89	1,086
2-4 Axle Trucks:			2	3	5	3	4	7	100
5+-Axle Trucks:			3	3	6	3	3	6	136
Total Truck Trips (Actual Vehicles):			5	6	11	6	7	13	236
Total Industrial Trips (Actual Vehicles):			54	21	75	31	71	102	1,322
Strip Retail	30.825	TSF	44	29	73	102	101	203	1,678
Internal Capture (NCHRP 684)			-4	-4	-8	-51	-29	-80	-662
Pass-by Reduction (PM/Daily=40%)			0	0	0	-20	-20	-41	-408
High-Turnover (Sit-Down) Restaurant	5.000	TSF	26	22	48	28	18	46	536
Internal Capture (NCHRP 684)			0	0	0	-1	-2	-3	-24
Pass-By Reduction (PM/Daily=43%)			0	0	0	-12	-12	-23	-222
Fast Food Without Drive-Thru	23.775	TSF	595	431	1,027	395	395	790	10,710
Internal Capture (NCHRP 684)			-3	-3	-6	-19	-34	-53	-440
Pass-By Reduction (AM=50%; PM/Daily=55%)			-214	-214	-428	-199	-199	-398	-5,650
Fast-Food Drive-Thru	10.400	TSF	237	227	464	179	165	344	4,862
Internal Capture (NCHRP 684)			-1	-1	-2	-9	-15	-24	-198
Pass-By Reduction (AM=50%; PM/Daily=55%)			-113	-113	-226	-83	-83	-166	-2,566
Total Retail Trips			567	374	942	310	285	595	7,616
Industrial Cars			49	15	64	25	64	89	1,086
Retail Cars			567	374	942	310	285	595	7,616
Industrial Trucks (Actual Vehicles)			5	6	11	6	7	13	236
Total Project Trips (Actual Vehicles)			621	395	1,017	341	356	697	8,938
Total Trips from Current Traffic Study (Actual Vehicles)			635	399	1,035	349	374	723	9,266
Comparison to Traffic Study (Actual Vehicle)			-14	-4	-18	-8	-18	-26	-328
Passenger Car Equivalent (PCE): ² High-Cube Fulfillment	620.000	TSF							

Land Use	Quantity	Units ¹	AM	Peak	Hour	PM	Peak	Hour	Daily
			In	Out	Total	In	Out	Total	
Passenger Cars:			49	15	64	25	64	89	1,086
2-4 axle Trucks (PCR=2.0)			5	5	10	6	7	13	202
5+-axle Trucks (PCE=3.0)			10	10	20	9	10	19	404
Total Truck Trips (PCE)			15	15	30	15	17	32	606
Total Industrial Trips (PCE)			64	30	94	40	81	121	1,692
Industrial Cars			49	15	64	25	64	89	1,086
Retail Cars			567	374	942	310	285	595	7,616
Industrial Trucks (PCE)			15	15	30	15	17	32	606
Total Project Trips (PCE)			631	404	1,036	350	366	716	9,308
Total Trips from Current Traffic Study (PCE)			647	411	1,059	360	386	746	9,728
Comparison to Traffic Study (PCE)			-16	-7	-23	-10	-20	-30	-420

Source: Urban Crossroads 2023

¹ TSF=thousand square feet

² Pass-by trip reduction source: Institute of Transportation Engineers (ITE), trip General Manual, Eleventh Edition (2021).

Comparative Analysis of Environmental Impacts

Aesthetics

Similar to the Project, development of the Reduced Industrial Alternative would alter the existing visual character of the Project site through introduction of industrial and commercial retail/restaurant development on a previously vacant, undeveloped site. The Reduced Industrial Alternative would comply with the Standards and Guidelines set forth in the PVCCSP, as described in Section 4.1, Aesthetics, including building orientation, screening, architecture, lighting, signage, walls/fences, and landscaping. The architectural design of the industrial and commercial buildings would be similar to the Project described in Section 3.0 of this EIR. As the industrial warehouse building would be reduced from 774,419 square feet to approximately 620,000 square feet, a reduction of approximately 154,419 square feet, the Reduced Industrial Alternative would result in a smaller, potentially less bulky industrial building than the Project. However, it is expected that the overall visual appearance under this alternative would be similar to the Project and would not represent a significant change from the proposed Project. As with the Project, the development associated with the Reduced Industrial Alternative would comply with County of Riverside Ordinance No. 655, which addresses nighttime lighting that could affect the Palomar Observatory, and requirements set forth in the PVCCSP related to lighting and glare.

Section 4.1, Aesthetics, of this EIR, concluded that the Project would result in less than significant impacts to aesthetics with implementation of Project-specific mitigation. With incorporation of the applicable PVCCSP Standards and Guidelines, and Project-specific mitigation, the Reduced Industrial Alternative would have similar, less than significant impacts as the Project related to aesthetics.

Air Quality

Implementation of the Reduced Industrial Alternative would have a similar construction impact area as the Project. Therefore, construction assumptions with respect to the intensity of construction would also be similar. Section 4.2, Air Quality, of this EIR, concluded the Project would result in a less than significant impact to air quality associated with construction. The Reduced Industrial Alternative would

have similar, less than significant impacts as the Project related to air quality associated with construction.

The Project would result in an increase in the number of employees, vehicular trips, and associated criteria pollutants compared to what would occur under existing conditions. However, as noted in Section 4.2, Air Quality, of this EIR, criteria for determining consistency with the SCAQMD 2022 AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the *1993 CEQA Handbook*. The Project would be consistent Consistency Criterion No. 1 and consistent with Consistency Criterion No. 2 for both construction and operation of the Project. As such, the Project would be consistent with the SCAQMD 2022 AQMP. However, as the Reduced Industrial Alternative would reduce the warehouse building square footage, there would be a reduction in the number of employees and associated vehicular trips. Therefore, the Project and this alternative would not conflict with the consistency criterion outlined in the SCAQMD 2022 AQMP.

With a reduction in the warehouse building square footage under the Reduced Industrial Alternative, there would be a reduction in trip generation. The Reduced Industrial Alternative would result in 8,938 daily trips compared to 9,266 daily trips with the Project. There would be 328 less daily trips under this alternative than the Project (58 less industrial truck trips and 270 less industrial car trips). With a reduced number of industrial trips from the reduced warehouse building square footage, it is assumed operational emissions of VOC NO_x, and CO would be reduced as compared to the Project. Even with a reduction in the warehouse buildings square footage and a reduction in associated industrial trips, the Reduced Industrial Alternative would have similar, significant, and unavoidable impacts as the Project related to operational air quality.

Biological Resources

Section 4.3, Biological Resources, of this EIR, concluded that the Project would result in less than significant impacts to biological resources with implementation of Project-specific mitigation measures. The Reduced Industrial Alternative would involve a similar construction impact area as the Project. Therefore, this alternative would result in similar impacts to biological resources (including potential impacts to nesting birds, burrowing owl, and fairy shrimp species) as the Project. With incorporation of Project-specific mitigation measures, the Reduced Industrial Alternative would have similar, less than significant impacts as the Project related to biological resources.

Cultural Resources

Section 4.4, Cultural Resources, of this EIR, concluded that the Project would result in less than significant impacts to cultural resources with implementation of Project-specific mitigation measures. The Reduced Industrial Alternative would involve a similar construction impact area as the Project. Therefore, similar to the Project, this alternative would not include historic or known cultural resources at the Project site. With incorporation of Project-specific mitigation measures, the Reduced Industrial Alternative would have similar, less than significant impacts as the Project related to cultural resources.

Energy

Implementation of the Reduced Industrial Alternative would result in lower energy demand during construction compared to the Project because of the overall reduction in building size. The Reduced Industrial Alternative would involve a reduction in the warehouse building from 774,419 square feet to approximately 620,000 square feet, a reduction of approximately 154,419 square feet. The intensity of

the building would be reduced by approximately 20 percent. The proposed commercial retail/restaurant use areas to the south and to the west would remain as proposed. It is assumed this alternative would result in reduced energy demand during operational activities due to a reduction in the warehouse square footage. Therefore, this alternative could potentially result in reduced energy impacts as compared to the Project.

Section 4.5, Energy, of this EIR, concluded the Project would result in less than significant impacts to energy with implementation of applicable PVCCSP EIR mitigation measures. Although the Reduced Industrial Alternative could result in reduced energy impacts as compared to the Project, with incorporation of applicable PVCCSP EIR mitigation measures, this alternative would have similar, less than significant impacts as the Project related to energy.

Geology and Soils

Section 4.6, Geology and Soils, of this EIR, concluded the Project would result in a less than significant impact or no impact to geology and soils with implementation of applicable PVCCSP EIR mitigation measures, PVCCSP Standards and Guidelines relevant to geology and soils, and Project-specific mitigation. The Reduced Industrial Alternative would involve a similar construction impact area. Therefore, this alternative would result in similar potential impacts related to geology and soil hazards as the Project. With adherence to applicable building codes and incorporation of the recommendations from the site-specific geotechnical studies, the Project and the Reduced Industrial Alternative would not expose people or structures to substantial safety risks associated with geologic hazards. Further, because the construction impact area would be similar to the Project, this alternative would also have the potential to impact subsurface paleontological resources and the impact would be reduced to a less than significant level with mitigation.

Greenhouse Gas Emissions

Section 4.7, Greenhouse Gas Emissions, of this EIR, concluded that the Project would result in significant and unavoidable impacts to GHG emissions with implementation of applicable PVCCSP EIR mitigation measures and Project-specific mitigation measures. Implementation of the Reduced Industrial Alternative would result in similar construction activities and associated GHG emissions as the Project. With the overall reduction in the warehouse building area and a reduction in the number of industrial trips, it is assumed this alternative would result in reduced emissions from all operational GHG sources. The Reduced Industrial Alternative would result in 8,938 daily trips compared to 9,266 daily trips with the Project. There would be 328 less daily trips under this alternative than the Project (58 less industrial truck trips and 270 less industrial car trips). Although GHG emissions would be reduced, it is assumed that the 3,000 MT CO₂e/yr threshold would still be exceeded. Therefore, this alternative would result in significant and unavoidable GHG emissions impacts, similar to the Project.

Hazards and Hazardous Materials

Neither implementation of the Reduced Industrial Alternative nor the Project would result in a significant impact related to hazards or hazardous materials. Based on the location and condition of the Project site, the Reduced Industrial Alternative and the Project would have no impact associated with location on a hazardous materials site, or wildland fire. As with the Project, uses anticipated under this alternative would not result in hazardous emissions. Land uses that would occur onsite under the Reduced Industrial Alternative would have a similar potential to handle and store hazardous materials as

the Project, and similar impacts related to hazards associated with the March Air Reserve Base/Inland Port Airport (MARB/IPA), and emergency response/evacuation.

Section 4.7, Hazards and Hazardous Materials, of this EIR, concluded that the Project would result in a less than significant impact or no impact to hazards and hazardous materials, with implementation of PVCCSP Standards and Guidelines relevant to hazards and hazardous materials. Project-specific mitigation is not required. The Reduced Industrial Alternative would have similar, less than significant impacts as the Project related to hazards and hazardous materials.

Hydrology and Water Quality

The Reduced Industrial Alternative would involve a similar construction impact area. Therefore, this alternative would result in similar impacts related to hydrology and water quality as the Project. Similar to the Project, development under this alternative would increase the amount of storm water runoff and alter existing drainage patterns due to the increase in the amount of impervious surface. As with the Project, application of BMPs and other regulatory requirements would ensure that impacts to hydrology and storm drain infrastructure are less than significant. A Commercial Site Water Quality Management Plan (WQMP) and Industrial Site WQMP were prepared to analyze surface water drainage on both sites and would be implemented under the Project and the Reduced Industrial Alternative.

As with the Project, the Reduced Industrial Alternative would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. The Project and this alternative would implement design features and BMPs such as the use of landscaping to facilitate some groundwater recharge and percolation. As with the Project, the Reduced Industrial Alternative would rely on domestic water supply from the EMWD.

As with the Project, the Reduced Industrial Alternative would result in surface runoff after Project implementation. Surface runoff from a developed condition (with either this alternative or the Project) would have a different composition in comparison to the existing condition, which is undeveloped. This runoff is likely to include a similar amount and type of pollutants commonly found in urban runoff. As required under the NPDES, an SWPPP would be created specifically for construction of the Project and this alternative. The Project and this alternative would be required to comply with applicable regulations related to water quality, including, but not limited to the MS4 and NPDES permit requirements, which would minimize potential short-term, construction-related, and long-term, operational water quality impacts.

Section 4.8, Hydrology and Water Quality, of this EIR, concluded that the Project would result in less than significant impacts to hydrology and water quality with implementation of PVCCSP Standards and Guidelines relevant to hydrology and water quality. Project-specific mitigation is not required. The Reduced Industrial Alternative would have similar, less than significant impacts as the Project related to water quality during construction and operation.

Land Use and Planning

Section 4.10, Land Use and Planning, of this EIR, concluded that the Project would be consistent with the previously analyzed PVCCSP aside from the Specific Plan Amendment that is required to change a portion of the site's Commercial zoning to Light Industrial, which includes warehouse facilities as a permitted use. As with the Project, the Reduced Industrial Alternative would result in the development of an industrial and commercial retail/restaurant use project and would require an amendment to the

PVCCSP to change the zoning from Commercial use to Light Industrial. The Reduced Industrial Alternative would be developed in compliance with the relevant Standards and Guidelines outlined in the PVCCSP and would not result in significant land use impacts, as with the Project. The Reduced Industrial Alternative and the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Section 4.10, Land Use and Planning, of this EIR, concluded that the Project would result in less than significant impacts to land use and planning. Project-specific mitigation is not required. The Reduced Industrial Alternative would have similar, less than significant impacts as the Project related to land use and planning.

Noise

The Reduced Industrial Alternative would involve a similar construction impact area to the Project. Therefore, construction of the Reduced Industrial Alternative would result in similar noise impacts as the Project. Section 4.11, Noise, of this EIR, concluded that the Project would result in less than significant construction impacts to noise, with implementation of applicable PVCCSP EIR mitigation measures. Under the Reduced Industrial Alternative, construction noise impacts would be less than significant, similar to the Project.

As identified previously, the Reduced Industrial Alternative would generate approximately 8,938 daily trips compared to 9,266 daily trips with the Project. Notably, the volume of trucks to the industrial site would be lower than the Project, thereby reducing off-site noise levels from trucks. Under the Reduced Industrial Alternative, Project-related trucks would enter and exit the warehouse facility only from Perry Street via Redlands Avenue, a PVCCSP-designed truck route, to Harley-Knox Boulevard to travel to and from Interstate (I-) 215, similar to the Project.

The Reduced Industrial Alternative would involve similar operations onsite; however, particularly relevant to operational noise, there would be a reduction in truck activity at the industrial building loading docks compared to what would occur with the Project. Therefore, it is assumed there would be a reduction in operational noise impacting nearby sensitive noise receivers under this alternative. As with the Project, the Reduced Industrial Alternative would not be subjected to substantial noise levels from MARB/IPA operations.

Section 4.11, Noise, of this EIR, concluded that the Project would result in a less than significant impact to operational noise levels. With a reduction in the warehouse buildings square footage and a reduction in associated warehouse truck trips, the Reduced Industrial Alternative would have similar, less than significant impacts as the Project related to operational noise, similar to the Project.

Transportation

The Reduced Industrial Alternative would result in 8,938 daily trips compared to 9,266 daily trips with the Project. There would be 328 less daily trips (58 less industrial truck trips and 270 less industrial car trips). Notably, the volume of trucks to the industrial site would be lower due to the reduction in the warehouse building square footage. As with the Project, the Reduced Industrial Alternative would meet two of the screening criteria identified in the Perris Traffic Impact Analysis Guidelines: being with one-half a mile of qualifying transit and being located within a low vehicles miles traveled (VMT) area. Therefore, based on the fact that the Project and the Reduced Industrial Alternative meets two of the screening criteria identified in the City of Perris Traffic Impact Analysis Guidelines and as discussed in

more detail above, a VMT study is not required for the Project and Project impacts related to VMT would be less than significant.

As with the Project, the Reduced Industrial Alternative would not conflict with regional or local programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact would be less than significant. As with the Project, this alternative would incorporate applicable PVCCSP Standards and Guidelines, PVCCSP EIR mitigation measures, and Project design features. The Reduced Industrial Alternative and the Project would not conflict with applicable programs, plans, ordinances, or policies addressing the circulation system; would not create hazards through design; and would not result in inadequate emergency access. As with the Project, these transportation impacts would be less than significant.

Tribal Cultural Resources

The Reduced Industrial Alternative would involve a similar construction impact area as the Project. Although there are no known tribal cultural resources within the Project site, this alternative would result in similar potential impacts to tribal cultural resources within the Project site as the Project, should they be present.

Section 4.13, Tribal Cultural Resources, of this EIR, concluded that the Project would result in a less than significant impact to tribal cultural resources with implementation of Project-level mitigation. With incorporation of Project-specific mitigation, the Reduced Industrial Alternative would have similar, less than significant impacts as the Project related to tribal cultural resources.

Utilities and Service Systems

As with the Project, the Reduced Industrial Alternative would increase the water demand, wastewater generation, and electric demand at the Project site compared to existing conditions where the site is undeveloped. Additionally, as discussed above under *Hydrology and Water Quality*, the Reduced Industrial Alternative would involve development of a similar area that would occur with implementation of the Project and would generate a similar amount of storm water runoff. Although the total building area would be reduced, the overall utility infrastructure needed to serve the Reduced Industrial Alternative would be similar as the Project and would be located within a similar construction impact area.

As discussed in Section 4.14, Utilities and Service Systems, of this EIR, a Project-specific WSA was prepared for the Project. The EMWD estimates the annual water demand for the Project to be approximately 48.30 AFY; however, due to the reduced warehouse building area, it is expected the total water consumption and associated wastewater generation would be less under the Reduced Industrial Alternative. In the EMWD's 2020 UWMP, the demand projections for the parcels covering the Project site were estimated based on Commercial Retail land use, with a total demand of approximately 119.08 AFY. Accordingly, the water demand for the Project and the Reduced Industrial Alternative would be less than that estimated in EMWD 2020 UWMP for the Project site, and the EMWD would have sufficient water supplies to serve uses under this alternative and the Project, resulting in a less than significant impact. Similarly, the wastewater generated from the Project represents approximately 0.03 percent of the current daily treatment capacity of the Perris Valley Regional Wastewater Reclamation Facility (RWRP). As the wastewater generation for this alternative is assumed to be less than with the Project, there would be adequate capacity in EMWD wastewater treatment facilities to

treat wastewater generated. The Reduced Industrial Alternative and the Project would have less than significant impacts related to water supply and wastewater treatment.

As with the Project, construction, and operation of industrial uses under the Reduced Industrial Alternative would comply with applicable local and State regulations related to solid waste management and diversion of solid waste from landfills. The Reduced Industrial Alternative and Project would have less than significant impacts related to solid waste.

Conclusions

Avoid or Substantially Lessen the Significant Impact of the Project

The Reduced Industrial Alternative would involve a reduction in the industrial warehouse building area and a reduction in vehicular trips (including trucks). Therefore, significant, and unavoidable impacts associated with operational criteria pollutant emissions (air quality impacts) and GHG emissions would be reduced, but not eliminated with this alternative. For all other topical areas, similar or reduced impact levels would occur with the Reduced Industrial Alternative as compared to the Project.

Attainment of Project Objectives

Following is a discussion of the Reduced Industrial Alternative's ability to attain the Project Objectives:

- 1. Provide an attractive mixed use retail project along the Ramona Expressway that enhances and meets the local demand for the availability of social gathering places, retail services, and eateries in an underserved area of the Perris Valley Commerce Center Specific Plan, thereby providing additional job opportunities in a housing-rich area and providing more equal jobs to housing balance.**

The Reduced Industrial Alternative would reduce the warehouse building square footage, and the commercial retail/restaurant use area would remain as proposed. Therefore, the Reduced Industrial Alternative would attain this objective.

- 2. Setting aside additional land for future commercial, retail, and office opportunities in the fast-growing Perris Blvd Corridor to further enhance job opportunities, local services, and retail, commercial uses in an area that is housing rich but underserved in these areas.**

The Reduced Industrial Alternative would reduce the warehouse building square footage, and the commercial retail/restaurant use area would remain as proposed. Therefore, the Reduced Industrial Alternative would attain this objective.

- 3. Maximize the development of Class A speculative high cube warehouse industrial buildings that meet contemporary industry standards for operational design criteria, can accommodate a wide variety of users, and are economically competitive with similar warehouse buildings in the local area and region, which will assist the City of Perris in competing economically on a domestic and international scale through the efficient and cost-effective movement of goods.**

The Reduced Industrial Alternative would have less industrial building area than the Project, and thus would not maximize development at the Project site. Therefore, the Reduced Industrial Alternative would achieve this objective but not as effectively as the Project.

- 4. Maximize industrial warehouse development in close proximity to designated truck routes and the State highway system in order to avoid or shorten truck-trip lengths on other roadways and avoid locating industrial warehouse buildings in proximity to residential uses.**

The Reduced Industrial Alternative would have less industrial building area than the Project, and thus would not maximize development at the Project site. Therefore, the Reduced Industrial Alternative would achieve this objective but not as effectively as the Project.

- 5. Implement drainage improvements in conjunction with the Project to accommodate the 100-year storm flows in the area, including a public storm drain conveyance that would ultimately capture stormwater runoff from the region to the detention basin east of the project site, thus solving regional flooding problems.**

The Reduced Industrial Alternative would attain this objective.

- 6. Accommodate new development in a phased, orderly manner that is coordinated with the provision of necessary infrastructure and public improvements.**

The Reduced Industrial Alternative would attain this objective.

- 7. Provide for uses that will generate tax revenue for the City of Perris, including, but not limited to, increased property and sales tax, to support the City's ongoing municipal operations.**

The Reduced Industrial Alternative would have less industrial building area than the Project, and thus it is anticipated it would not generate as much tax revenue as the Project. Therefore, the Reduced Industrial Alternative would achieve this objective but not as effectively as the Project.

5.3.4 Reduced Commercial Alternative

Description of Alternative

The purpose of the Reduced Commercial Alternative is to address significant and unavoidable impacts of the Project related to operational and cumulative air quality and GHG emissions through a reduction in the commercial building's square footage on the southern commercial site. Under this alternative, the number of commercial retail/restaurant use buildings on the southern commercial site would be reduced from four buildings to three buildings, with a total square footage of 23,308 square feet rather than 45,000 square feet. The proposed 25,000-square-foot western commercial retail/restaurant use area and the 774,419-square-foot industrial warehouse building would remain as proposed. As outlined in Section 3.0, Project Description, of this EIR, landscaping would be provided along the entire site perimeter of both the warehouse and retail portions of the Project site, within the automobile parking areas for visual quality and shading, and at select building-adjacent locations. Under this alternative, the proposed landscaping plan would remain in similar condition. Additionally, under this alternative, trucks and vehicles would enter/exit the industrial and commercial use areas from similar streets as proposed under the Project.

As outlined in Section 3.0, Project Description, the Project would provide three automobile access driveways off Perris Boulevard with right-in/right-out access only (one for warehouse access and two for access to the 4.8-acre future western retail component), and three truck and automobile access driveways off Perry Street with left-in/right-out access only for trucks and no turn restrictions for automobiles. The southern retail component would have one right-in/right-out access driveway and one full signalized access driveway on Ramona Expressway. This alternative would also include similar

proposed improvements to drainage, roads, and utilities, as identified under the Project. The only change under this alternative is a reduction in the southern commercial building's square footage.

The Reduced Commercial Alternative would result in a reduction of overall trip generation compared to the Project. Trip generation rates for the Project are provided in Table 4.12-2 of this EIR and trip generation estimates for this alternative are provided in Table 5-3. As shown in Table 5-3, the Reduced Commercial Alternative would result in a reduction in trip generation compared to the Project (7,676 daily trips compared to 9,266 daily trips with the Project). There would be 1,590 less daily trips (1,590 less retail cars).

Table 5-3
TRIP GENERATION SUMMARY - REDUCED COMMERCIAL ALTERNATIVE

Land Use	Quantity	Units ¹	AM	Peak	Hour	PM	Peak	Hour	Daily
			In	Out	Total	In	Out	Total	
Actual Vehicles: High-Cube Fulfillment	774.419	TSF							
Passenger Cars:			61	18	79	31	80	111	1,356
2-4 Axle Trucks:			3	3	6	4	5	9	126
5+-Axle Trucks:			4	4	8	4	4	8	168
Total Truck Trips (Actual Vehicles):			7	7	14	8	9	17	294
Total Industrial Trips (Actual Vehicles):			68	25	93	39	89	128	1,650
Strip Retail	16.754	TSF	24	16	40	55	55	110	912
Internal Capture (NCHRP 684)			-2	-2	-4	-28	-16	-44	-366
Pass-by Reduction (PM/Daily=40%)			0	0	0	-11	-11	-22	-220
High-Turnover (Sit-Down) Restaurant	5.000	TSF	26	22	48	28	18	46	536
Internal Capture (NCHRP 684)			0	0	0	-1	-1	-2	-16
Pass-By Reduction (PM/Daily=43%)			0	0	0	-12	-12	-23	-224
Fast Food Without Drive-Thru	16.754	TSF	420	304	723	278	278	556	7,548
Internal Capture (NCHRP 684)			-1	-1	-2	-9	-16	-25	-214
Pass-By Reduction (AM=50%; PM/Daily=55%)			-152	-152	-304	-144	-144	-288	-4,034
Fast-Food Drive-Thru	10.300	TSF	234	225	459	177	163	340	4,816
Internal Capture (NCHRP 684)			-1	-1	-2	-6	-11	-17	-136
Pass-By Reduction (AM=50%; PM/Daily=55%)			-112	-112	-224	-84	-84	-168	-2,576
Total Retail Trips			436	299	734	244	220	463	6,026
Industrial Cars			61	18	79	31	80	111	1,356
Retail Cars			436	299	734	244	220	463	6,026
Industrial Trucks (Actual Vehicles)			7	7	14	8	9	17	294
Total Project Trips (Actual Vehicles)			504	324	827	283	309	591	7,676
Total Trips from Current Traffic Study (Actual Vehicles)			635	399	1,035	349	374	723	9,266
Comparison to Traffic Study (Actual Vehicle)			-131	-75	-208	-66	-65	-132	-1,590
Passenger Car Equivalent (PCE): ² High-Cube Fulfillment	620.000	TSF							
Passenger Cars:			61	18	79	31	80	111	1,356

Land Use	Quantity	Units ¹	AM	Peak	Hour	PM	Peak	Hour	Daily
			In	Out	Total	In	Out	Total	
2-4 axle Trucks (PCR=2.0)			6	6	12	8	9	17	252
5+ axle Trucks (PCE=3.0)			13	13	26	11	12	23	504
Total Truck Trips (PCE)			19	19	38	19	21	40	756
Total Industrial Trips (PCE)			80	37	117	50	101	151	2,112
Industrial Cars			61	18	79	31	80	111	1,356
Retail Cars			567	374	942	310	285	595	7,616
Industrial Trucks (PCE)			19	19	38	19	21	40	756
Total Project Trips (PCE)			516	336	851	294	321	614	8,138
Total Trips from Current Traffic Study (PCE)			647	411	1,059	360	386	746	9,728
Comparison to Traffic Study (PCE)			-131	-75	-208	-66	-65	-132	-1,590

Source: Urban Crossroads 2023

1 TSF=thousand square feet

2 Pass-by trip reduction source: Institute of Transportation Engineers (ITE), trip General Manual, Eleventh Edition (2021).

Comparative Analysis of Environmental Impacts

Aesthetics

Similar to the Project, development of the Reduced Commercial Alternative would alter the existing visual character of the Project site through introduction of industrial and commercial retail/restaurant development on a previously vacant, undeveloped site. The Reduced Commercial Alternative would comply with the Standards and Guidelines set forth in the PVCCSP, as described in Section 4.1, Aesthetics, including building orientation, screening, architecture, lighting, signage, walls/fences, and landscaping. The architectural design of the industrial and commercial buildings would be similar to the Project as described in Section 3.0 of this EIR. As the commercial retail/restaurant building square footage would be reduced from 45,000 square feet to approximately 23,308 square feet, with a reduction in the number of buildings from four commercial retail/restaurant use buildings to three, the Reduced Commercial Alternative would result in an overall similar visual appearance on the Project site and would not represent a significant change from the proposed Project. As with the Project, the development associated with the Reduced Commercial Alternative would comply with County of Riverside Ordinance No. 655, which addresses nighttime lighting that could affect the Palomar Observatory, and requirements set forth in the PVCCSP related to lighting and glare.

Section 4.1, Aesthetics, of this EIR, concluded that the Project would result in less than significant impacts to aesthetics with implementation of Project-specific mitigation. With incorporation of the applicable PVCCSP Standards and Guidelines and the Project-level mitigation addressing construction activities, the Reduced Commercial Alternative would have similar, less than significant impacts as the Project related to aesthetics.

Air Quality

Implementation of the Reduced Commercial Alternative would have a similar construction impact area as the Project, and the construction assumptions with respect to the intensity of construction would be similar. Section 4.2, Air Quality, of this EIR, concluded the Project would result in a less than significant impact to air quality associated with construction. The Reduced Commercial Alternative would have similar, less than significant impacts as the Project related to air quality impacts associated with construction.

The Project would result in an increase in the number of employees, vehicular trips, and associated criteria pollutants compared to what would occur under existing conditions. However, as noted in Section 4.2, Air Quality, of this EIR, criteria for determining consistency with the SCAQMD 2022 AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the *1993 CEQA Handbook*. The Project would be consistent with Consistency Criterion No. 1 and consistent with Consistency Criterion No. 2 for both construction and operation of the Project. As such, the Project would be consistent with the SCAQMD 2022 AQMP. However, as the Reduced Commercial Alternative would reduce the southern commercial retail/restaurant building square footage, there would be a reduction in the number of employees and associated vehicular trips. Therefore, the Project and this alternative would not conflict with the consistency criterion outlined in the SCAQMD 2022 AQMP.

With a reduction in the southern commercial building area under the Reduced Commercial Alternative, there would be a reduction in trip generation. The Reduced Commercial Alternative would result in 7,676 daily trips compared to 9,266 daily trips with the Project. There would be 1,590 less daily trips (1,590 less retail cars). With a reduced number of retail car trips from the reduced southern commercial building square footage, it is assumed operational emissions of VOC, NO_x, and CO, would be reduced as compared to the Project. Although operational air quality emissions would be reduced, it is assumed the SCAQMD thresholds of significance would still be exceeded under this alternative. Even with a reduction in the southern commercial building square footage and a reduction in associated commercial retail car trips, the Reduced Commercial Alternative would have similar, significant, and unavoidable impacts as the Project related to operational air quality.

Biological Resources

Section 4.3, Biological Resources, of this EIR, concluded that the Project would result in less than significant impacts to biological resources with implementation of Project-specific mitigation measures. The Reduced Commercial Alternative would involve a similar construction impact area as the Project. Therefore, this alternative would result in similar impacts to biological resources (including potential impacts to nesting birds, burrowing owl, and fairy shrimp species) as the Project. With incorporation of the Project-specific mitigation measures, the Reduced Commercial Alternative would have similar, less than significant impacts as the Project related to biological resources.

Cultural Resources

Section 4.4, Cultural Resources, of this EIR, concluded that the Project would result in a less than significant impact to cultural resources with implementation of Project-specific mitigation measures. The Reduced Commercial Alternative would involve a similar construction impact area as the Project. Therefore, similar to the Project, this alternative would not include historic or known cultural resources impacts at the Project site. With incorporation of Project-specific mitigation measures, the Reduced Commercial Alternative would have similar, less than significant impacts as the Project related to cultural resources.

Energy

Implementation of the Reduced Commercial Alternative would result in lower energy demand during construction compared to the Project because of the overall reduction in building size. The Reduced Commercial Alternative would involve a reduction in the commercial retail/restaurant use building area square footage from 45,000 square feet to 23,308 square feet, with a reduction from four to three commercial retail/restaurant use buildings. The proposed 25,000-square-foot commercial retail use area

to the south and the 774,419-square-foot warehouse building would remain as proposed. It is assumed this alternative would result in reduced energy demand during operational activities due to a reduction in the commercial retail/restaurant use building square footage. Therefore, this alternative could potentially result in reduced energy impacts as compared to the Project.

Section 4.5, Energy, of this EIR, concluded the Project would result in a less than significant impact to energy with implementation of applicable PVCCSP EIR mitigation measures. Although this alternative could result in reduced energy impacts than the Project, with incorporation of PVCCSP EIR mitigation measures, the Reduced Commercial Alternative would have similar, less than significant impacts as the Project related to energy.

Geology and Soils

Section 4.6, Geology and Soils, of this EIR, concluded that the Project would result in a less than significant impact or no impact to geology and soils with implementation of applicable PVCCSP EIR mitigation measures and Project-specific mitigation measures. The Reduced Commercial Alternative would involve a similar construction impact area. Therefore, this alternative would result in similar potential impacts related to geology and soils as the Project. With adherence to applicable building codes and incorporation of the recommendations from the site-specific geotechnical studies, the Project and Reduced Commercial Alternative would not expose people or structures to substantial safety risks associated with geologic hazards. Further, because the construction impact area would be similar to the Project, this alternative would also have the potential to impact subsurface paleontological resources and the impact would be reduced to a less than significant level with mitigation.

Greenhouse Gas Emissions

Section 4.7, Greenhouse Gas Emissions, of this EIR, concluded that the Project would result in significant and unavoidable impacts to GHG emissions. Implementation of the Reduced Commercial Alternative would result in similar construction activities and associated GHG emissions as the Project. With the overall reduction in the southern commercial building area and a reduction in the number of retail car trips, it is assumed this alternative would result in reduced emissions from all operational GHG sources. The Reduced Commercial Alternative would result in 7,676 daily trips compared to 9,266 daily trips with the Project. There would be 1,590 less daily trips (1,590 less retail cars). Although GHG emissions would be reduced, it is assumed the 3,000 MT CO₂e/ yr threshold would still be exceeded. Therefore, this alternative would result in significant and unavoidable GHG emissions impacts, similar to the Project.

Hazards and Hazardous Materials

Neither implementation of the Reduced Commercial Alternative nor the Project would result in a significant impact related to hazards or hazardous materials. Based on the location and condition of the Project site, the Reduced Commercial Alternative and the Project would have no impact associated with location on a hazardous materials site, or wildland fire. As with the Project, uses anticipated under this alternative would not result in hazardous emissions. Land uses that would occur onsite under the Reduced Commercial Alternative would have a similar potential to handle and store hazardous materials as the Project, and similar impacts related to hazards associated with the MARB/IPA, and emergency response/evacuation.

Section 4.7, Hazards and Hazardous Materials, of this EIR, concluded that the Project would result in a less than significant impact or no impact to hazards and hazardous materials, with implementation of

PVCCSP Standards and Guidelines relevant to hazards and hazardous materials. Project-specific mitigation is not required. The Reduced Commercial Alternative would have similar, less than significant impacts as the Project related to hazards and hazardous materials.

Hydrology and Water Quality

The Reduced Commercial Alternative would involve a similar construction impact area. Therefore, this alternative would result in similar impacts related to hydrology and water quality as the Project. Similar to the Project, development under this alternative would increase the amount of storm water runoff and alter existing drainage patterns due to the increase in the amount of impervious surface. As with the Project, application of BMPs and other regulatory requirements would ensure that impacts to hydrology and storm drain infrastructure are less than significant. A Commercial Site WQMP and Industrial Site WQMP were prepared to analyze surface water drainage on both sites and would be implemented for the Project and the Reduced Commercial Alternative.

As with the Project, the Reduced Commercial Alternative would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. The Project and the alternative would implement design features and BMPs such as the use of landscaping to facilitate some groundwater recharge and percolation. As with the Project, the Reduced Commercial Alternative would rely on domestic water supply from the EMWD.

As with the Project, the Reduced Commercial Alternative would result in surface runoff after Project implementation. Surface runoff from a developed condition (with either this alternative or the Project) would have a different composition in comparison to the existing condition, which is undeveloped. This runoff is likely to include a similar amount and type of pollutants commonly found in urban runoff. As required under the NPDES, an SWPPP would be created specifically for construction of the Project and this alternative. The Project and this alternative would be required to comply with applicable regulations related to water quality, including, but not limited to the MS4 and NPDES permit requirements, which would minimize potential short-term, construction-related, and long-term, operational water quality impacts.

Section 4.8, Hydrology and Water Quality, of this EIR, concluded that the Project would result in less than significant impacts to hydrology and water quality with implementation of PVCCSP Standards and Guidelines relevant to hydrology and water quality. Project-specific mitigation is not required. The Reduced Commercial Alternative would have similar, less than significant impacts as the Project related to water quality during construction and operation.

Land Use and Planning

Section 4.10, Land Use and Planning, of this EIR, concluded that the Project would be consistent with the previously analyzed PVCCSP aside from the Specific Plan Amendment that is required to change a portion of the site's Commercial zoning to Light Industrial, which includes warehouse facilities as a permitted use. As with the Project, the Reduced Commercial Alternative would result in the development of an industrial and commercial retail Project and would require an amendment to the PVCCSP to change the zoning from Commercial use to Light Industrial. The Reduced Commercial Alternative would be developed in compliance with the relevant Standards and Guidelines outlined in the PVCCSP and would not result in significant land use impacts, as with the Project. The Reduced Commercial Alternative and the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Section 4.10, Land Use and Planning, of this EIR, concluded that the Project would result in less than significant impacts to land use and planning. The Reduced Commercial Alternative would have similar, less than significant impacts as the Project related to land use and planning.

Noise

The Reduced Commercial Alternative would involve a similar construction impact area to the Project. Therefore, construction of the Reduced Commercial Alternative would result in similar noise impacts as the Project. Section 4.11, Noise, of this EIR, concluded that the Project would result in a less than significant construction impact to noise with implementation of applicable PVCCSP EIR mitigation measures. Under the Reduced Commercial Alternative, construction noise impacts would be less than significant, similar to the Project.

The Reduced Commercial Alternative would involve similar operations onsite; however, particularly relevant to operational noise, there would be a reduction in retail cars at the commercial retail/restaurant use buildings compared to what would occur with the Project. The Reduced Commercial Alternative would generate approximately 7,676 daily trips compared to 9,266 daily trips with the Project. Notably, the volume of retail cars entering the strip retail, sit-down restaurants, and fast food with and without drive-thru would be lower, thereby reducing off-site noise levels from retail cars. Therefore, there would be a potential reduction in operational noise impacting nearby sensitive noise receivers under this alternative. As with the Project, the Reduced Commercial Alternative would not be subjected to substantial noise levels from MARB/IPA operations.

Section 4.11, Noise, in this EIR, concluded that the Project would result in a less than significant impact to operational. With a reduction in the commercial retail/restaurant use building square footage and a reduction in associated retail trips, it is assumed the Reduced Commercial Alternative would have a less than significant impact related to operational noise, similar to the Project.

Transportation

The Reduced Commercial Alternative would result in 7,676 daily trips compared to 9,266 daily trips with the Project. There would be 1,590 less daily trips (1,590 less retail cars). With the reduced commercial building area, there would be less vehicle traffic entering the strip retail, sit-down restaurants, and fast food with and without drive-thru. As with the Project, the Reduced Commercial Alternative would meet two of the screening criteria identified in the Perris Traffic Impact Analysis Guidelines: being within one-half a mile of qualifying transit and being located within a low VMT area. Therefore, since the Project and the Reduced Commercial Alternative meets two of the screening criteria identified in the City of Perris Traffic Impact Analysis Guidelines and as discussed in more detail above, a VMT study is not required for the Project and impacts related to VMT would be less than significant.

As with the Project, the Reduced Commercial Alternative would not conflict with regional or local programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact would be less than significant. As with the Project, this alternative would incorporate applicable PVCCSP Standards and Guidelines, PVCCSP EIR mitigation measures, and Project Design Features. The Reduced Commercial Alternative and the Project would not conflict with applicable programs, plans, ordinances, or policies addressing the circulation system; would not create hazards through design; and would not result in inadequate emergency access. As with the Project, these transportation impacts would be less than significant.

Tribal Cultural Resources

The Reduced Commercial Alternative would involve a similar construction impact area as the Project. Although there are no known tribal cultural resources within the Project site, this alternative would result in similar potential impacts to tribal cultural resources within the Project site as the Project, should they be present.

Section 4.13, Tribal Cultural Resources, of this EIR, concluded that the Project would result in a less than significant impact to tribal cultural resources with implementation of Project-level mitigation. With incorporation of Project-specific mitigation, the Reduced Commercial Alternative would have similar, less than significant impacts as the Project related to tribal cultural resources.

Utilities and Service Systems

As with the Project, the Reduced Commercial Alternative would increase the water demand, wastewater generation, and electric demand at the Project site compared to existing conditions where the site is undeveloped. Additionally, as discussed above under *Hydrology and Water Quality*, the Reduced Commercial Alternative would involve development of a similar area that would occur with implementation of the Project and would generate a similar amount of storm water runoff. Although the total commercial building area would be reduced, the overall utility infrastructure needed to serve the Reduced Commercial Alternative would be similar as the Project and would be located within a similar construction impact area.

As discussed in Section 4.14, Utilities and Service Systems, of this EIR, a Project-specific WSA was prepared for the Project. The EMWD estimates the annual water demand for the Project to be approximately 48.30 AFY; however, due to the reduced commercial retail building area, it is expected the total water consumption and associated wastewater generation would be less under the Reduced Commercial Alternative. In the EMWD's 2020 UWMP, the demand projections for the parcels covering the Project site were estimated based on Commercial Retail land use, with a total demand of approximately 119.08 AFY. Accordingly, the water demand for the Project and the Reduced Commercial Alternative would be less than that estimated in EMWD 2020 UWMP for the Project site, and the EMWD would have sufficient water supplies to serve uses under this alternative and the Project, resulting in a less than significant impact. Similarly, the wastewater generated from the Project represents approximately 0.03 percent of the current daily treatment capacity of the Perris Valley RWRP. As the wastewater generation for this alternative would be less than with the Project, there would be adequate capacity in EMWD wastewater treatment facilities to treat wastewater generated. The Reduced Commercial Alternative and the Project would have less than significant impacts related to water supply and wastewater treatment.

As with the Project, construction, and operation of industrial and commercial retail/restaurant uses under the Reduced Commercial Alternative would comply with applicable local and state regulations related to solid waste management and diversion of solid waste from landfills. The Reduced Commercial Alternative and Project would have a less than significant impact related to solid waste.

Conclusions

Avoid or Substantially Lessen the Significant Impact of the Project

The Reduced Commercial Alternative would involve a reduction in the southern commercial retail area and a reduction in vehicular trips (including trucks). Therefore, significant, and unavoidable impacts associated with operational air quality impacts and GHG emissions would be reduced, but not eliminated with this alternative. For all other topical areas, similar or reduced impact levels would occur with the Reduced Industrial Alternative as compared to the Project.

Attainment of Project Objectives

Following is a discussion of the Reduced Industrial Alternative's ability to attain the Project Objectives:

- 1. Provide an attractive mixed use retail project along the Ramona Expressway that enhances and meets the local demand for the availability of social gathering places, retail services, and eateries in an underserved area of the Perris Valley Commerce Center Specific Plan, thereby providing additional job opportunities in a housing-rich area and providing more equal jobs to housing balance.**

The Reduced Commercial Alternative would reduce the southern commercial retail building square footage, and the western commercial retail/restaurant use area and the industrial warehouse building area would remain as proposed. As the Reduced Commercial Alternative would have smaller commercial building area than the Project, it would not maximize development at the Project site. Therefore, the Reduced Commercial Alternative would achieve this objective but not as effectively as the Project.

- 2. Setting aside additional land for future commercial, retail, and office opportunities in the fast-growing Perris Blvd Corridor to further enhance job opportunities, local services, and retail, commercial uses in an area that is housing rich but underserved in these areas.**

The Reduced Commercial Alternative would reduce the southern commercial retail building square footage, and the western commercial retail/restaurant use area and the industrial warehouse building area would remain as proposed. As the Reduced Commercial Alternative would have smaller commercial building area than the Project, it would not maximize development at the Project site. Therefore, the Reduced Commercial Alternative would achieve this objective but not as effectively as the Project.

- 3. Maximize the development of Class A speculative high cube warehouse industrial buildings that meet contemporary industry standards for operational design criteria, can accommodate a wide variety of users, and are economically competitive with similar warehouse buildings in the local area and region, which will assist the City of Perris in competing economically on a domestic and international scale through the efficient and cost-effective movement of goods.**

The Reduced Commercial Alternative would reduce the southern commercial retail building square footage, and the western commercial retail/restaurant use area and the industrial warehouse building area would remain as proposed. Therefore, the Reduced Commercial Alternative would attain this objective.

- 4. Maximize industrial warehouse development in close proximity to designated truck routes and the State highway system in order to avoid or shorten truck-trip lengths on other roadways and avoid locating industrial warehouse buildings in proximity to residential uses.**

The Reduced Commercial Alternative would reduce the southern commercial retail building square footage, and the western commercial retail/restaurant use area and the industrial warehouse building area would remain as proposed. Therefore, the Reduced Commercial Alternative would attain this objective.

- 5. Implement drainage improvements in conjunction with the Project to accommodate the 100-year storm flows in the area, including a public storm drain conveyance that would ultimately capture stormwater runoff from the region to the detention basin east of the project site, thus solving regional flooding problems.**

The Reduced Commercial Alternative would attain this objective.

- 6. Accommodate new development in a phased, orderly manner that is coordinated with the provision of necessary infrastructure and public improvements.**

The Reduced Commercial Alternative would attain this objective.

- 7. Provide for uses that will generate tax revenue for the City of Perris, including, but not limited to, increased property and sales tax, to support the City's ongoing municipal operations.**

The Reduced Commercial Alternative would have smaller commercial building area than the Project, and thus it is anticipated it would not generate as much tax revenue as the Project. Therefore, the Reduced Commercial Alternative would achieve this objective but not as effectively as the Project.

5.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. Section 15126.6(e)(2) of the State CEQA Guidelines states that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

The No Project/No Development Alternative has the least impact to the environment because it would not involve any construction activities of industrial or commercial operations. There would be no impacts associated with a cumulatively considerable increase of VOC and NO_x (O₃ precursors) and CO during operation and no cumulative impacts related to GHG emissions. These impacts are considered significant and unavoidable for the Project. While this alternative would avoid the significant effects of the Project, it would not be consistent with the City's General Plan or PVCCSP, which anticipates development of the Project site, resulting in a potentially significant land use impact. Additionally, none of the Project objectives would be met.

The No Project–All Commercial Development Alternative may increase operational noise impacts due to the addition of a car wash and due to an increase in total daily trips. Therefore, although it would meet many of the basic Project objectives, the No Project–All Commercial Development Alternative would not be the environmentally superior alternative.

With regard to the remaining development alternatives, the Reduced Industrial Alternative is environmentally superior to the Project and the other alternatives. Both the Reduced Industrial Alternative and the Reduced Commercial Alternative would lessen impacts to aesthetics, air quality, energy, greenhouse gas emission, noise, and transportation; however, the Reduced Industrial Alternative would have a greater reduction in building square footage, which is assumed to further reduce the impacts compared to the Reduced Commercial Alternative.

The Reduced Industrial Alternative would reduce the warehouse building square footage from 774,419 square feet to approximately 620,000 square feet, a reduction of approximately 154,419 square feet. Under the Reduced Commercial Alternative, the southern commercial retail building square footage would be reduced from 45,000 square feet to 23,308 square feet, a reduction of approximately 21,692 square feet. The Reduced Industrial Alternative would also result in approximately 328 less daily trips than the Project, 58 less industrial truck trips and 270 less industrial car trips. However, under both the Reduced Industrial Alternative and the Reduced Commercial Alternative, operational air quality and GHG impacts would remain significant and unavoidable. Table 5-4 compares the impacts of the alternatives with those of the Project and identifies whether the alternative results in: (1) a reduction of the impact; (2) a greater impact than the Project; or (3) a similar impact as the Project.

Table 5-4
COMPARISON OF ALTERNATIVES TO THE PROJECT

Impact Area	Project	No Project/No Development (Alternative 1)	No Project–All Commercial (Alternative 2)	Reduced Industrial (Alternative 3)	Reduced Commercial (Alternative 4)
Aesthetics	LS	No impact (less)	LS (similar)	LS (less)	LS (less)
Air Quality					
Construction	LS	No impact (less)	LS (similar)	LS (similar)	LS (similar)
Operation	SU	No impact (less)	SU (similar)	SU (less)	SU (less)
Biological Resources	LS	No impact (less)	LS (similar)	LS (similar)	LS (similar)
Cultural Resources	LS	No impact (less)	LS (similar)	LS (similar)	LS (similar)
Energy	LS	No impact (less)	LS (similar)	LS (less)	LS (less)
Geology and Soils	LS	No impact (less)	LS (similar)	LS (similar)	LS (similar)
GHG Emissions (Cumulative)	SU	No impact (less)	SU (similar)	SU (less)	SU (less)
Hazards and Hazardous Materials	LS	No impact (less)	LS (similar)	LS (similar)	LS (similar)
Hydrology and Water Quality	LS	No impact (less)	LS (similar)	LS (similar)	LS (similar)
Land Use and Planning	LS	No impact (less)	LS (similar)	LS (similar)	LS (similar)
Noise					
Construction	LS	No impact (less)	LS (similar)	LS (similar)	LS (similar)
Onsite Operations	LS	No impact (less)	LS (greater)	LS (less)	LS (less)
Offsite Traffic-Related	LS	No impact (less)	LS (greater)	LS (less)	LS (less)

Impact Area	Project	No Project/No Development (Alternative 1)	No Project–All Commercial (Alternative 2)	Reduced Industrial (Alternative 3)	Reduced Commercial (Alternative 4)
Transportation	LS	No impact (less)	LS (similar)	LS (less)	LS (less)
Tribal Cultural Resources	LS	No impact (less)	LS (similar)	LS (similar)	LS (similar)
Utilities and Service Systems	LS	No impact (less)	LS (similar)	LS (similar)	LS (similar)

LS=Less than significant; SU= Significant and Unavoidable

5.5 REFERENCES

City of Perris. 2022. DEIR Ramona Gateway Project. SCH No. 2022040023.

Urban Crossroads. 2023. Trip Generation Tables for Alternatives 2, 3, and 4.

6.0 OTHER CEQA CONSIDERATIONS

The State CEQA Guidelines set forth several general content requirements for EIRs. Those applicable to this Project include effects determined to be not significant (Section 15128), significant and unavoidable environmental effects (Section 15126(b)), significant irreversible environmental effects (Section 15126.2(c)), and growth inducing impacts (Section 15126(d)). This section addresses each of those general requirements. Cumulative impacts (Section 15130) are discussed within the analysis for each respective environmental issue area (Section 4).

6.1 EFFECTS DETERMINED NOT TO BE SIGNIFICANT

CEQA provides that an EIR shall focus on the potentially significant effects on the environment, discussing the effects with emphasis in proportion to their severity and probability of occurrence. As concluded by the Project's NOP (included in Appendix A of this Draft EIR) and after consideration of all comments received by the City on the scope of this Draft EIR and documented in the City's administrative record, six (6) environmental subjects were determined by the City to have clearly no potential to be significantly impacted by the Project: Agriculture and Forestry Resources, Mineral Resources, Population and Housing, Public Services, Recreation, and Wildfire.

6.1.1 Agriculture and Forestry Resources

Pursuant to CEQA Section 21060.1, agricultural land means Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, as defined by the U.S. Department of Agriculture land inventory and monitoring criteria as modified for California. The State CEQA Guidelines Appendix G thresholds of significance used by the City of Perris for CEQA purposes states that a significant impact to agriculture could occur if a project was to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. Based on the California Department of Conservation's (DOC's) Farmland Mapping and Monitoring Program, the Project site is classified as Farmland of Local Importance (DOC 2018) and is surrounded by areas also designated as Farmland of Local Importance or Urban and Built-Up Land. The Project site and surrounding areas are not currently being utilized for agricultural purposes. Moreover, the Project site is not within an area subject to a California Land Conservation Act of 1965 (Williamson Act) contract and is not otherwise zoned by the City for agricultural use. Similarly, the Project site does not contain forest resources. Therefore, the Project would have no impact related to agriculture and forestry resources.

6.1.2 Mineral Resources

According to the City's General Plan, the land within the City is classified as Mineral Resource Zone (MRZ) 3 and MRZ 4, which are not considered to be significant mineral resource areas. The CDC is primarily interested in the preservation of significant resources in MRZ 2 regions. Further, the City does not have designated locally important mineral resource recovery sites in the General Plan. In addition, the California DOC does not show oil, gas, or geothermal fields underlying the site; and no oil or gas wells are recorded on or near the site in the Division of Oil, Gas, and Geothermal Resources (DOGGR) Well Finder (DOC 2021). Therefore, implementation of the proposed Project would not result in the loss of availability of a regionally or locally important mineral resource and no impact would occur.

6.1.3 Population and Housing

The Project does not include residential structures or other infrastructure that would encourage residential development. The Project would create jobs within the City that would be expected to be filled by the existing population. The job creation would not be of a magnitude to induce substantial population growth. Additionally, the Project site is currently vacant and therefore implementation of the Project would not necessitate the construction of replacement housing.

Table 4.8-E, *Development Intensity and Employment Projections*, of the PVCCSP EIR, identifies average employment generation factors for the allowed development types identified in the PVCCSP. One employee per 1,030 square feet is estimated for light industrial floor space and one employee per 500 square feet is estimated for commercial uses. The Project consists of the construction and operation of up to 774,419 square feet of warehouse uses, and 70,000 square feet of commercial retail uses.

Based on the employment generation factors in the PVCCSP EIR, the Project could generate approximately 752 new industrial employees and 140 new commercial retail employees (approximately 892 new jobs). The PVCCSP EIR estimates that implementation of the land uses allowed under the PVCCSP would result in the generation of approximately 56,087 jobs/employees in the area (see Table 4.8-E under Section 4.8, Land Use and Planning, and the discussion of “Growth Inducing Impacts” in Section 5 of the PVCCSP EIR). Therefore, the employment generation estimated for the Project (892 employees) represents approximately 1.6 percent of the total employment generation anticipated in the Specific Plan area. Further, this represents approximately 3.4 percent of the City's projected employment base by 2045 as presented in the Southern California Association of Governments (SCAG) Connect SoCal (26,400 employees) (SCAG 2020).

Additionally, similar to the short-term construction jobs, it is anticipated that these new retail and warehouse positions would be filled by workers who would already reside in the region. The Project would involve the installation of utilities necessary to connect to existing infrastructure systems adjacent to or in the vicinity of the Project site and would involve improvements to adjacent roadways, consistent with the PVCCSP. Therefore, the Project would not directly or indirectly generate substantial unplanned population growth in the area. No significant impacts related to population or housing are expected as a result of the proposed Project.

6.1.4 Public Services

The PVCCSP EIR Initial Study concluded that development within the PVCCSP area, which includes the Project site, would result in less than significant impacts to public services. The City of Perris has concluded that the Project would not result in potentially significant impacts to public services as discussed below.

6.1.4.1 Fire Protection

While implementation of the Project would not involve new residential uses or uses that would increase the City's population, the operation of the proposed industrial and retail buildings would increase the demand for fire protection, prevention, and emergency medical services at the currently undeveloped site. California Department of Forestry and Fire Protection (CAL FIRE), under contract with Riverside County and operating as Riverside County Fire Department (RCFD), provides fire prevention and suppression to the City of Perris. RCFD Station No. 1 located at 210 W. San Jacinto Avenue and

RCFD Station No. 90 at 333 Placentia Avenue exclusively serve the City of Perris. RCFD Station No. 1 is approximately 4.6 miles southwest of the Project site. RCFD Station No. 90 is approximately 2.2 miles south of the Project site. Other RCFD stations respond to emergency service calls in the City on an as-needed basis. The Project would create the typical range of service calls for industrial and retail developments, such as medical aid, fire response, and traffic collisions.

The Project would be designed in compliance with all applicable ordinances and standard conditions established by the RCFD and/or the City or State including, but not limited to those regarding fire prevention and suppression measures, such as fire hydrants, fire access, emergency exits, combustible construction, fire flow, and fire sprinkler systems. Compliance with applicable regulations would be confirmed by the RCFD during its review of development plans to ensure it has the capacity to provide proper fire protection to the development. The development of the Project would not cause fire staffing, facilities, or equipment to operate at a deficient level of service. Additionally, the Project Applicant would be required to pay North Perris Road and Bridge Benefit District (NPRBBD) fees, inclusive of the City's Development Impact Fee (DIF), which provides a funding source for construction of fire facilities as a result of impacts related to future growth in the City. The Project would not require the construction of new or expanded fire protection facilities; therefore, no physical impacts would result and the impact would be less than significant.

6.1.4.2 Police Protection

While implementation of the Project would not involve new residential uses or uses that would increase the City's population, the operation of proposed industrial and commercial retail buildings would increase the demand for police protection services at the currently undeveloped site. The City of Perris contracts with the Riverside County Sheriff Department (RCSD) for the provision of municipal police services in the City. The Project would be designed and operated in compliance with the standards provided within the City's Municipal Code, RCSD, and the PVCCSP for new development with regard to public safety. The Perris Police Station is located at 137 N. Perris Boulevard and is located approximately 4.5 miles southwest of the Project site. Sheriff response times vary by time of day and priority of the call. Typical operational police protection services involved with the proposed industrial and retail uses include after-hours patrol, crime and traffic accident/collision responses, and calls for service. The Project Applicant would be required to contribute DIF fees which would ensure the Project provides fair share funds for the provision of additional police protection services, which may be applied to sheriff facilities and/or equipment, to offset the incremental increase in the demand that would be created by the Project. Therefore, the Project's incremental demand for sheriff protection services would be less than significant with the Project's mandatory payment of DIF fees. The Project would not require the construction of new or expanded police protection facilities; therefore, no physical impacts would result, and the impact would be less than significant.

6.1.4.3 Schools

The Project site is located with the Val Verde Unified School District (VVUSD), which covers 67 square miles in Riverside County, and is comprised of 22 schools serving pre-kindergarten through 12th grade (VVUSD 2022). The Project site is within the service area for the following schools: May Ranch Elementary School, Vista Verde Middle School, Rancho Verde High School, and Val Verde High School. The Project would not directly create a source of students, as the Project does not involve the development of residential land uses. Therefore, no school-age children would be living at the Project, and no direct demand for school services and facilities would occur.

Additionally, as previously discussed, it is expected that the new jobs that would be created by the Project would be filled by individuals that reside in the area. Appropriate developer impact fees, as required by State law, shall be assessed and paid by the Project Applicant to the VVUSD. Section 65995(b) of the California Government Code establishes the base amount of allowed developer fees and allows increases in the base fee every two years. School districts are placed into a specific “level” based on school impact fee amounts that are imposed on the development. With the payment of the required fees and with no additional students generated from the Project, no significant impacts to school services would result. The Project would not require the construction of new or expanded schools; therefore, no physical impacts would result, and the impact would be less than significant.

6.1.4.4 Parks

The City of Perris Community Services Department provides community services and recreational and leisure time opportunities and is responsible for the planning, development, and maintenance of the City's parks and recreational facilities. The Project area currently does not contain any parkland or recreational facilities. The nearest park is Morgan Park, located approximately 0.7 miles southeast, and includes the following amenities: basketball courts, parking lot, picnic tables, playground, restrooms, group shelter, snack bar, soccer field, walking trail, and barbeques (City of Perris 2022). The Project does not propose the development of any type of residential land use or other use that would result in a direct increase in the City's population or demand for park services. The Project would not require the construction of new or expanded park facilities; therefore, no physical impacts would result, and the impact would be less than significant.

6.1.4.5 Other Public Facilities

Residents of the City of Perris are provided library services through the Riverside County Library System (RCLS). As identified in the PVCCSP EIR Initial Study, development of allowed uses under the PVCCSP, including industrial and retail uses proposed as part of the Project, would not directly increase the demand for library or other public services as no new residential uses would be developed and no direct increase in the resident population would result that may create a demand for library services. As previously discussed, it is expected that the new jobs that would be created by the Project would be filled by individuals that reside in the area. The Project would not require the construction of new or expanded library facilities; therefore, no physical impacts would result, and the impact would be less than significant.

The proposed Project, while it would require a Specific Plan Amendment, would require similar public services to the site's planned commercial use. As discussed above, the Project would not generate population growth that would further increase the demand for public services. Impacts would be less than significant.

6.1.5 Recreation

The City's Community Services Department is responsible for recreational facilities in the City. As required by Section 8.2 of the PVCCSP, the Project would provide onsite employee amenities. The proposed Project is a commercial and warehouse site, which would not induce population growth or otherwise increase the use of or create the need for new parks and recreational facilities. Similarly, the proposed Project would not result in physical deterioration of existing recreation facilities such that there would be a need to construct expanded facilities. Therefore, no impact would occur in relation to

existing recreation facilities. The impacts associated with the construction of on-site recreational facilities for Project site employees will be addressed in the applicable sections of the EIR.

6.1.6 Wildfire

According to Exhibit S-16, Wildfire Constraint Areas, of the City General Plan Safety Element, the Project site is not located in or near an area identified as being a “Wildfire Hazard Area.” Additionally, the Project site is not classified as a Wildfire Hazard Area in the City’s General Plan or as a Very High Fire Hazard Severity Zone by CAL FIRE’s map for the City. The Project site is located within the limits of the City of Perris and is therefore not within a State Responsibility Area (SRA), which is the land where the State of California is financially responsible for the prevention and suppression of wildfires. Therefore, the Project would have no direct or indirect impacts related to wildfire.

6.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The environmental impacts of the Project are discussed in Sections 4.1 through 4.14 of this EIR, as applicable. With incorporation of applicable PVCCSP EIR mitigation measures and Project-specific mitigation measures, impacts related to the following topical issues would be less than significant: Aesthetics, Biological Resources, Cultural Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Transportation, Tribal Cultural Resources, and Utilities and Services Systems. Even with incorporation of the applicable PVCCSP EIR mitigation measures, the Project would result in the following significant and unavoidable impacts.

- **Project and Cumulative Considerable Increase in Criteria Pollutant during Operation:** As discussed in Section 4.2, Air Quality, of this EIR, the proposed Project has the potential to result in cumulative impacts associated with on-going operations for emissions of VOCs, NO_x, and CO. The operational emissions are primarily associated with vehicle emissions. The City of Perris or the Project Applicant do not have regulatory authority to control tailpipe emissions; therefore, no feasible mitigation beyond the measures identified in the EIR exist that would reduce VOC and NO_x emissions to levels below the regional thresholds established by the SCAQMD. Therefore, operation of the Project would result in a significant and unavoidable cumulatively considerable net increase of a criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard. Therefore, the proposed Project would have the potential to result in a cumulatively significant and unavoidable impacts with respect to operational activity.
- **Project and Cumulative Greenhouse Gas Emissions:** As discussed in Section 4.7, Greenhouse Gas Emissions, of this EIR, the Project’s greenhouse gas (GHG) emissions would exceed the threshold of 3,000 metric tons of carbon dioxide equivalents per year (MTCO₂e/yr) used for this analysis. Additionally, the total GHG emissions would exceed the SCAQMD interim significance threshold of 10,000 MTCO₂e/yr for industrial projects. There are no additional feasible mitigation measures beyond those identified in the EIR that would reduce the Project’s GHG emissions to a less than significant level. Therefore, the proposed Project would have the potential to result in cumulatively significant and unavoidable impacts with respect to GHG emissions.

No mitigation measures are feasible to reduce these potentially significant Project and cumulative impacts to a less than significant level. Therefore, adoption of a Statement of Overriding Considerations is required.

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

Pursuant to State CEQA Guidelines Section 15126.2(c), an EIR must include a description of significant irreversible environmental changes that would be caused by the proposed action. Section 15126.2(c) reads as follows:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

An impact could fit into this category if:

- The project would involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of the project would generally commit future generations of people to similar uses;
- The project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project; and/or,
- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether the proposed Project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. Although the Project site is currently vacant and does not contain unique local or regional resources, the proposed Project would likely permanently alter the site for future generations by converting a predominantly vacant parcel to a developed use.

6.3.1 Irreversible Commitment of Resources

Implementation of the proposed Project would irreversibly commit the 45.6-acre vacant and underutilized Project site to commercial and industrial use. Although construction and operation of the proposed warehouse and associated commercial uses at the Project site would contribute to the incremental depletion of renewable and nonrenewable resources, the proposed Project would be consistent with other existing and planned development in the Project vicinity within the PVCCSP planning area.

Construction of the proposed Project will require the use of renewable resources such as lumber and other forest products, which could be expected to be replenished over the lifetime of the Project

because sustainably harvested lumber supplies are increased as seedlings mature into trees. As such, the development of the Project would not result in the irreversible commitment of renewable resources. Nevertheless, there would be an incremental increase in the demand for these resources during construction of the Project.

Construction of the Project will also result in the use of non-renewable resources including building materials (e.g., asphalt, petrochemical construction materials, steel, copper and other metals, and sand and gravel) and fossil fuels, including the use of fossil fuels for construction equipment, the transport of construction materials to the Project site and the transportation of construction workers to and from the Project site (e.g., natural gas, gasoline, diesel fuel and other petroleum-based products). These materials and the resources used in their production are available in a finite supply and are generally not retrievable, although some of the materials are recyclable. Construction materials like concrete and asphalt, for example, can be crushed and recycled as road base.

During Project operation, the Project would result in an irretrievable commitment of nonrenewable resources, such as energy resources and fossil fuels. Energy resources including petroleum and natural gas will be consumed during construction and operational phases of new development. Short-term, or construction-related, energy uses will include electricity for lights and construction equipment, and fossil fuels for construction equipment, and the transport of construction materials and workers to and from the Project site. Long-term energy resources include fuel consumed for the heating and cooling of the building, transportation of people and goods, as well as for lighting and other energy-related needs. Electricity consumption during construction and operation phases will increase the consumption of oil, 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.

As discussed in Section 4.5, Energy, of this DEIR, natural gas, energy, and fuel consumption will not be a significant impact and the Project will not result in wasteful use of these resources. Further, this is a justified consumption of resources because the proposed Project is consistent with the City's planned non-residential and employment generating use at the site and because there are no unique characteristics of the proposed Project that would make this Project operate at a less energy efficient level than other similar developments.

6.3.2 Irreversible Environmental Changes

The DEIR found that all potential environmental effects resulting from implementation of the proposed Project are below the level of significance or can be mitigated to below the level of significance. Therefore, although the Project will result in changes to the existing site conditions, the Project does not cause any significant irreversible environmental changes.

6.3.3 Potential Environmental Damage from Accidents

The Project Applicant proposes a high-cube, unrefrigerated warehouse/logistics center and commercial retail uses; however, potential impacts related to the creation of a significant hazard to the public or environment through the routine transportation, use, or disposal of hazardous materials, and the creation of a significant hazard to the public or environment through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment were found to be less than significant without mitigation required during preparation of the DEIR (Section 4.8, Hazards and Hazardous Materials). Additionally, impacts related to hazardous emissions or the handling of

hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or planned school, and safety hazards for people residing or working in the Project area, if within an airport land use plan or within two miles of a private or private-use airport will be reduced to less than significant levels through compliance with regulatory requirements and Riverside County Airport Land Use Commission conditions.

The Project site is located within a seismically active region and would be exposed to ground shaking during a seismic event. In order to address the potential for moderate to severe ground-shaking that may occur during the lifetime of the proposed structures, the Project will follow engineering and design parameters in accordance with the most recent edition of the California Building Code and/or the Structural Engineers Association of California parameters, as required in standard City conditions of approval.

6.4 GROWTH INDUCING IMPACTS

According to State CEQA Guidelines Section 15126.2(d), a project may foster economic or population growth, or additional housing, either indirectly or directly, in a geographical area if it meets any one of the following criteria below:

- A project would remove obstacles to population growth;
- Increases in the population may tax existing community service facilities, causing significant environmental effects; or
- A project would encourage and facilitate other activities that could significantly affect the environment.

The Project would not remove obstacles to population growth or directly contribute to population growth. The proposed Project involves construction and operation of commercial and industrial retail uses in an area that the City has planned for this type of development. In response to the Project's NOP, one comment letter was received from the South Coast Air Quality Management District (SCAQMD), recommending the use of their CEQA Air Quality Handbook and significance thresholds for the basis of the air quality and GHG analysis. The Project's consistency with the SCAQMD CEQA Air Quality Handbook was evaluated in Section 4.2-Air Quality and Section 4.7 Greenhouse Gas Emissions. The analysis in that section concluded the proposed Project is consistent with the SCAQMD CEQA Air Quality Handbook and provided mitigation measures where necessary.

Although the Project includes expansion of infrastructure and roadway improvements in the immediate Project vicinity, these improvements have been planned for by the PVCCSP and the Perris Comprehensive General Plan 2030 (Perris GP 2030) and are intended to mitigate additional impacts from operation of not only the proposed Project, but other similar development. Therefore, the Project would not remove barriers to population growth, nor does it create growth that would overwhelm or exceed existing services.

Project implementation may indirectly induce population growth in the short term because it will be a new source of employment within the City. However, the extent to which the new jobs created by a project are filled by existing residents is a factor that tends to reduce the growth inducing effect of a project. Construction of the proposed Project will create short-term construction jobs which are

anticipated to be filled by workers who, for the most part, reside in the Project area; therefore, construction of the proposed Project will not generate a permanent increase in population within the Project area. The workers constructing the Project are also not expected to require additional housing needs beyond those which are currently available in the City of Perris, or the surrounding County areas.

SCAG also publishes population, housing, and employment predictions for all cities within their region, including the City of Perris, based on information gathered from local planning documents, such as general and specific plans, within each SCAG-participating jurisdiction. As shown in Table 6-1 *Demographics and Growth*, the City's population was 83,088 in 2020 and is anticipated to grow to 121,038 in 2045.¹ Additionally, the number of jobs is anticipated to increase to 26,411 in 2045 from its current level of 19,013.

**Table 6-1
DEMOGRAPHICS AND GROWTH**

	2020	2030	2035	2045 (SCAG)
Population				
City of Perris	83,088	101,117	108,931	121,038
Housing Units				
City of Perris	21,431	27,458	30,007	33,798
Employment				
City of Perris	19,013	23,267	24,797	26,411

The Project Applicant proposes a Specific Plan Amendment, to allow for light industrial uses on the Project site. Although the site is designated entirely for commercial, the commercial aspects of the site fulfill this use, and the partial change to light industrial would not cause a significant change in employment and population as was already assumed within SCAGs projections. Specifically, as stated above, one employee per 1,030 square feet is estimated for light industrial floor space and one employee per 500 square feet is estimated for commercial uses. Light industrial uses generate less employment than commercial per square foot, and therefore the assumptions made in the PVCCSP would be conservative in regard to growth inducing impacts. The Perris GP 2030 EIR also considered urbanization of land, in general, will have a growth inducing impact and found that development consistent with the Perris GP 2030 reflects the logical, geographic expansion of development within Western Riverside County. Thus, as the Project is substantially similar to other developments within the PVCCSP planning area in the Project vicinity, the Project would also not result in urbanization in a remote location.

6.4.1 Short-Term Uses versus Long-Term Productivity

The long-term effect of the proposed Project will be to convert the currently vacant and underutilized site into light industrial and commercial uses. Consequently, the characteristics of the physical, biological, cultural, aesthetic, and human environment will be impacted, as with any form of urbanization. The consequences of this urbanization include incremental degradation of the regional air quality; incremental demands for public services and utilities; increased storm water runoff; and increased natural resource consumption. However, these impacts will not be substantially different from those identified and planned for in the Perris GP 2030 and the PVCCSP.

Ultimate development of the Project would create long-term environmental consequences that are connected with any form of urbanization. However, the proposed Project has been designed to benefit the community and population by providing increased opportunities for employment in closer proximity to residential development and will ultimately provide for a form of long-term productivity which appears compatible with human needs in the area.

6.5 REFERENCES

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