

# Final Environmental Impact Report

SCH No. 2021120497

## First March Logistics Project



**Lead Agency:**

**City of Perris**

135 North "D" Street  
Perris CA, 92570

**August 2024**

**FINAL  
ENVIRONMENTAL IMPACT REPORT**

**First March Logistics Project  
State Clearinghouse No. 2021120497**

**CITY OF PERRIS  
RIVERSIDE COUNTY, CALIFORNIA**

Lead Agency:

City of Perris  
101 North D Street  
Perris, California 92570-2200

August 2024

The City of Perris has independently reviewed, analyzed, and exercised its judgment in the analysis contained in this Environmental Impact Report and supporting documentation pursuant to Section 21082 of the California Environmental Quality Act.

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## **SECTION 1.0 INTRODUCTION**

In accordance with Section 15088 of the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines), the City of Perris (City), as the Lead Agency under the California Environmental Quality Act (CEQA), has evaluated the comments received on the Draft Environmental Impact Report (EIR) (State Clearinghouse [SCH] No. 2021120497) for the proposed First March Logistics Project (Project) and has prepared this Final EIR with written responses to these comments. This Final EIR has been prepared in accordance with CEQA and represents the independent judgment of the City of Perris as Lead Agency.

According to State CEQA Guidelines Section 15132, the Final EIR shall consist of:

- (a) The draft EIR or a revision of the draft;
- (b) Comments and recommendations received on the draft EIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies commenting on the draft EIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

The purpose of the Final EIR is to respond to all comments received by the City regarding the environmental information and analyses contained in the Draft EIR. Additionally, any clarifications/revisions to the Draft EIR generated from responses to comments are stated in the Final EIR, which includes the Draft EIR, as modified per the clarifications and revisions presented in Section 3.0 of this document.

In addition to the Final EIR (including supporting technical appendices), the City of Perris will also consider adoption of a Mitigation Monitoring and Reporting Plan (MMRP), a Statement of Findings of Fact, a Statement of Overriding Considerations, staff reports, and Resolutions as part of the approval process for the proposed Project.

### **1.1 CONTENT AND FORMAT**

Subsequent to this introductory section, Section 2 contains a copy of the comment letters received by the City regarding the Draft EIR, along with annotated responses to each comment contained within the letters. Section 3, Draft EIR Clarifications and Revisions, of this document contains clarifications/revisions to the Draft EIR. Section 4 contains the MMRP.

### **1.2 PUBLIC REVIEW OF THE DRAFT EIR**

As required by Section 15087 of the State CEQA Guidelines, a Notice of Completion (NOC) and a Notice of Availability (NOA) of the Draft EIR for the Project was filed with the State Clearinghouse (SCH) on April 27, 2023, and the NOA of the Draft EIR was also filed with the Riverside County Clerk. The Draft EIR was circulated for public review for 45 days, from April 28, 2023, to June 12, 2023. The NOA, NOC, and the Draft EIR and supporting technical appendices were also posted on the SCH CEQAnet Web Portal and the NOA was sent to responsible agencies and other interested agencies and parties on or about April 27, 2023. The NOA was also sent to adjacent property owners within 300 feet of the Project area and was posted in the

Perris Progress (the newspaper of general circulation in the area affected by the Project) on April 28, 2023. The NOA and Draft EIR were also made available for public review at the City Planning Division (by appointment) and on the City's website.

Eleven (11) comment letters were received by the City during the Draft EIR public review period and have been included and responded to in Section 2.0 of this Final EIR.

### **1.3 POINT OF CONTACT**

The Lead Agency for the proposed Project is the City of Perris. Any questions or comments regarding the preparation of this document, its assumptions, or its conclusions, should be referred to:

**Nathan Perez, Senior Planner**  
City of Perris  
Development Services Department, Planning Division  
135 N. D Street  
Perris, California 92570  
Phone: (951) 943-5003 ext. 279 • e-mail: NPerez@cityofperris.org

### **1.4 PROJECT SUMMARY**

The following information is summarized from the Project Description in the Draft EIR. For additional detail regarding the Project characteristics, along with analyses of the Project's potential environmental impacts, please refer to Draft EIR Sections 3.0 and 4.0, respectively.

#### **1.4.1 PROJECT LOCATION**

The Project site is located in the northwest portion of the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area, in the City of Perris, in Riverside County. The Project site includes a 27.56-acre property generally located north of Nandina Street, immediately west of Natwar Lane, and immediately south of March Air Reserve Base/Inland Port Airport (MARB/IPA). The Project site is located immediately east of Interstate (I)-215, 1.74 miles north of Ramona Expressway, and approximately 5.0 miles south of State Route (SR)-60.

#### **1.4.2 PROPOSED PROJECT**

The Project involves the construction and operation of two industrial buildings totaling 554,375 square feet (sf) on approximately 27.56 acres. The buildings would allow for either high-cube, non-refrigerated warehouse/distribution, or manufacturing uses. Building 1 would be 419,034 sf including warehouse and office space and Building 2 would be 125,341 sf including warehouse and office space. Space to accommodate 8,000 sf and 7,000 sf of office space is provided in Buildings 1 and 2, respectively; the office locations are designated to be located at the corners of the buildings.

The proposed buildings are rectangular-shaped. Building 1 is approximately 879 feet long and 460 feet wide with 77 dock doors located on the west and east sides of the building. Building 2 is approximately 214 feet long and 494 feet wide with 16 dock doors located on the south side of the building. The truck courts for each building would be enclosed and screened from view.

The proposed buildings have been designed to comply with applicable standards and guidelines outlined in Section 4.2.3 of the PVCCSP related to architecture (including scale, massing, and

building relief, roofs and parapets, design and color and materials). In general, the architectural style consists of modern industrial design. The buildings would be constructed of painted concrete tilt-up panels and low-reflective materials, including low-reflective glass. The exterior color palette would be comprised of various shades of white, gray, and beige with accent colors and black brick veneer façade accent. The proposed buildings would be a maximum of 51 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. Visual relief from building form would be achieved through fenestration, mullions, exterior canopies at the office entries, and through variations in height and rooflines, and the use of parapets.

The Project would also include PVCCSP-required employee amenities. Specifically, a break room with ping-pong table would be provided within the proposed buildings. A Bocce Court would be provided near the southwestern side of Building 1 and southeastern corner of Building 2 site adjacent to the truck parking. An outdoor break and lunch area with covered trellis would also be provided next to the two Bocce courts and one on the southeastern corner of the Building 1 site adjacent to the truck parking. Further, trash enclosures would be provided in the truck parking areas near the proposed office space in Building 1 and next to the pump room in Building 2 site; the trash enclosures would be screened as required by the PVCCSP.

A key objective of the PVCCSP is to promote sustainable development and to encourage the use of "green" technologies. The Project would be constructed in compliance with California Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings and the Title 24 California Green Building Standards Code (CALGreen Code). The Project would also pursue the LEED Core & Shell rating program and is expected to reach the equivalent of a LEED "Silver" rating. Additionally, the Project incorporates PVCCSP EIR mitigation measures that serve to reduce greenhouse gas emissions.

As further described below, the Project involves a Development Plan Review (DPR) (Case No. DPR 20-00004) and a Tentative Parcel Map (TPM) Case No. 37965.

### **1.4.3 PROJECT OBJECTIVES**

The objectives of the Project include the following:

1. Implement the Perris Valley Commerce Center Specific Plan through development of land uses allowed by the Light Industrial and General Industrial land use designations and consistent with the Standards and Guidelines relevant to the Project site and proposed uses.
2. Implement City of Perris General Plan policies and objectives relevant to the Project site and proposed industrial development.
3. Expand economic development and facilitate job creation in the City of Perris by establishing a new industrial development area adjacent to an already-established industrial area.
4. Maximize development of speculative high-cube, non-refrigerated warehouse/distribution use, or manufacturing buildings in the Project site that meets 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.

5. Attract new businesses to the City of Perris and thereby provide a more equal jobs-housing balance in the Riverside County/Inland Empire area that will reduce the need for members of the local workforce to commute outside the area for employment.
6. Provide for uses that will generate tax revenue for the City of Perris including, but not limited to, increased property tax, to support the City's ongoing municipal operations.
7. Provide high-cube, non-refrigerated warehouse/distribution use, or manufacturing buildings that takes advantage of the area's proximity to various freeways and existing and planned transportation corridors to reduce traffic congestion on surface streets and to reduce concomitant air pollutant emissions from vehicle sources.
8. Accommodate new development in a phased, orderly manner that is coordinated with the provision of necessary infrastructure and public improvements.
9. Assist the SCAG region in achieving jobs/housing balance region-wide by providing additional job opportunities in a housing rich area of the Inland Empire.

#### 1.4.4 REQUIRED PERMITS AND DISCRETIONARY ACTIONS

The following discretionary actions are anticipated to be taken by the City of Perris as part of the Project:

- **Certification of EIR** with the determination that the EIR has been prepared in compliance with the requirements of CEQA.
- **Development Plan Review (DPR) (DPR 20-00004)** for the First March Logistics Project site plan and building elevations.
- **Tentative Parcel Map (TPM) Case No. 37965)** to subdivide the Project site into three (3) parcels (Refer to *Figure 3-18* of the Draft EIR).

Other non-discretionary actions anticipated to be taken by the City at the staff level as part of the Project include:

- Approval of grading and onsite utility plans;
- Approval of all off-site infrastructure plans, including street and utility improvement pursuant to the conditions of approval; and
- Approval of Final Water Quality Management Plans (FWQMP) to mitigate post-construction runoff flows.

Approvals and permits that may be required by other agencies (responsible agencies), include:

- **Regional Water Quality Control Board (RWQCB)**. Issuance of a Construction Activity General Construction Permit and a National Pollutant Discharge Elimination System (NPDES) permit.

- **Eastern Municipal Water District (EMWD).** Approval of Water Supply Assessment and water and sewer improvement plans.
- **South Coast Air Quality Management District (SCAQMD).** Permits to construct and/or permits to operate new stationary sources of equipment that emit or control air contaminants, such as heating, ventilation, and air conditioning (HVAC) units; and diesel fire water pumps.
- **Other Utility Agencies.** Issuance of permits and associated approvals, as necessary for the installation of new utility infrastructure or connections to existing facilities.

## SECTION 2.0 RESPONSES TO COMMENTS

Eleven (11) comment letters were received by the City during the Draft EIR public review period. Comments that address environmental concerns have been thoroughly addressed in this section of the Final EIR. Comments that do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines, include those that (1) do not address the adequacy or completeness of the Draft EIR; (2) do not raise environmental issues; or (3) do request the incorporation of additional information not relevant to environmental issues.

Section 15088 of the State CEQA Guidelines, Evaluation of and Response to Comments, states:

- a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments.
- b) The lead agency shall provide a written proposed response, either in a printed copy or in an electronic format, to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.
- b) The written responses shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail, giving the reasons that specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in the responses. Conclusory statements unsupported by factual information will not suffice. The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information or does not explain the relevance of evidence submitted with the comment.
- c) The responses to comments may take the form of a revision to the draft EIR or maybe a separate section in the final EIR. Where the responses to comments makes important changes in the information contained in the text of the draft EIR, the lead agency should either:
  1. Revise the text in the body of the EIR; or
  2. Include marginal notes showing that the information is revised in the responses to comments.

Revisions to the Draft EIR have been prepared to make minor corrections and clarifications to the Draft EIR as a result of comments received during the public review period (refer to Section 3.0, Draft EIR Clarifications and Revisions, of this document). Therefore, this Response to Comments section, along with the Draft EIR Revisions and MMRP, are included as part of this Final EIR along with the Draft EIR for consideration by the City of Perris prior to a vote to certify the Final EIR.

## **2.1 LIST OF PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES COMMENTING ON THE DRAFT EIR**

In accordance with Section 15132 of the State CEQA Guidelines, the agencies and organizations that submitted comments regarding the Draft EIR through the end of the public review period (June 12, 2023) are listed below. During the established public review period, eleven (11) comment letters were received by the City, which are indexed as Comment Letters A through K.

**A Agua Caliente Band of Cahuilla Indians (ACBCI) (May 3, 2023)**

Luz Salazar, Cultural Resources Analyst  
Tribal Historic Preservation Office

**B South Coast Air Quality Management District (AQMD) (June 8, 2023)**

Sam Wang, Program Supervisor, CEQA-IGR  
Planning, Rule Development & Implementation

**C California Department of Fish and Wildlife (CDFW) (June 12, 2023)**

Kim Freeburn, Environmental Program Manager  
Inland Deserts Region

**D Eastern Municipal Water District (EMWD) (May 8, 2023)**

Alfred Javier, Director of Environmental and Regulatory Compliance

**E March Joint Powers Authority (MJPA) (June 12, 2023)**

Jeffrey M. Smith, AICP, Principal Planner

**F Riverside County Airport Land Use Commission (ALUC) (April 9, 2023)**

Jackie Vega, Urban Regional Planner II

**G Riverside County Department of Environmental Health (DEH) (May 10, 2023)**

Jenay Marcotte, REHS  
Environmental Protection and Oversight Division

**H Lockwood, Andrews & Newman, Inc. (LAN) on behalf of the Riverside County Flood Control and Water Conservation District (District) (April 12, 2023)**

M. Cenk Yavas, P.E., Plan Check Engineer and  
Ruddy Argueta, P.E., Senior Civil Engineer

**I Riverside County Flood Control and Water Conservation District (District) (May 4, 2023)**

Amy McNeill, Engineering Project Manager

**J Riverside Transit Agency (May 9, 2023)**

Mauricio Alvarez, MBA, Planning Analyst

**K South Coast Air Quality Management District (May 18, 2023)**

Sahar Ghadimi, Air Quality Specialist, CEQA-IGR  
Planning, Rule Development & Implementation

## **2.2 RESPONSES TO COMMENTS**

Aside from courtesy statements, introductions, and closings, individual comments within the body of the comment letter have been identified and numbered. A copy of the comment letter and the City's responses to each comment are included in this section. Brackets delineating the individual comments and a numeric identifier have been added to the right margin of the letter. Responses to each comment identified are included on the page(s) following the comment letter. In accordance with Section 15132 of the State CEQA Guidelines, the responses to comments have been sent to all commenting parties.

COMMENT LETTER A

AGUA CALIENTE BAND OF CAHUILLA INDIANS

TRIBAL HISTORIC PRESERVATION



03-041-2019-006

May 03, 2023

[VIA EMAIL TO:nperez@cityofperris.org]  
City of Perris  
Mr. Nathan Perez  
135 North D Street  
Perris, CA 92570-2200

**Re: First March Logistics**

Dear Mr. Nathan Perez,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Natwar project. The project area is not located within the boundaries of the ACBCI Reservation. However, it is within the Tribe's Traditional Use Area. For this reason, the ACBCI THPO requests the following:

\*The Environmental Impact Report included standard mitigation measures to address impacts to cultural resources. We found these measures to be sufficient.

\*Please provide a copy of Brian F. Smith and Associates, Inc. (BFSA), 2023a. A Phase I Cultural Resources Survey for the First March Logistics Project, Perris California. February 23, 2023.

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760) 883-1137. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

Luz Salazar  
Cultural Resources Analyst  
Tribal Historic Preservation Office  
AGUA CALIENTE BAND  
OF CAHUILLA INDIANS

A-1

**Responses To Comment Letter A:**

**Agua Caliente Band of Cahuilla Indians**

A-1: The commenter acknowledges that while the Project area is not located within the boundaries of the Agua Caliente Band of Cahuilla Indians Reservation, it is within the Tribe's Traditional Use Area. The commenter states that standard mitigation measures to address impacts to cultural resources are sufficient and requests that the Tribe be provided a copy of the Cultural Resources Survey report. The Phase I Cultural Resources Survey is provided as Appendix D of the Draft EIR and is available for review on the City's website at <https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review>.

COMMENT LETTER B

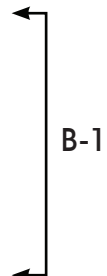


SENT VIA E-MAIL:  
[NPerez@cityofperris.org](mailto:NPerez@cityofperris.org)  
Nathan Perez, Senior Planner  
City of Perris  
Development Services Department  
Planning Division  
135 North "D" Street  
Perris, CA 92570

June 08, 2023

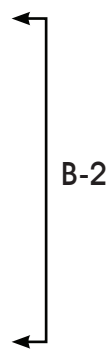
**Draft Environmental Impact Report (Draft EIR) for the First March Logistics Project**  
**(Proposed Project)**  
**(State Clearinghouse Number: 2021120497)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Perris is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the operational emissions from stationary and portable sources and specifying the type and nature of manufacturing activities, Localized Significant Thresholds (LSTs) for operational emissions analysis, health risk assessment during operation, cumulative impacts during project operation, and information about South Coast AQMD air permits that the Lead Agency should include in the Revised Draft EIR or the Final EIR.



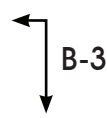
South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the project description in the Draft EIR, the Lead Agency proposes construction of two warehouse buildings totaling 559,005 square feet (sf) on 27.26 acres.<sup>1</sup> The Project consists of a single 419,032 sf warehouse building (Building 1) and a second 125,341 sf warehouse building (Building 2). The buildings would allow for either high-cube, non-refrigerated warehouse/distribution, or manufacturing uses. The Proposed Project is situated near the northeast corner of Interstate 215 and Nandina Avenue.<sup>2</sup> After reviewing the aerial photographs, South Coast AQMD staff has found that the nearest sensitive receptor (e.g., adult care center) is located 1613 feet south of the Proposed Project. The Proposed Project consists of two phases: Phase 1 (Building 1) is expected to be constructed by 2023, and Phase 2 (Building 2) is anticipated to be constructed by 2025.<sup>3</sup>



South Coast AQMD Staff's Comments on the Draft EIR

*Operational Emissions from Stationary and Portable Sources*



<sup>1</sup> Draft EIR, p. 1-2.  
<sup>2</sup> Ibid, p. 1-2.  
<sup>3</sup> Ibid, p. 1-2.

COMMENT LETTER B

Nathan Perez

June 8, 2023

The Draft EIR indicates that the proposed buildings are designed to accommodate high-cube, non-refrigerated warehouse/distribution, or manufacturing purposes, with a specific emphasis on excluding any chemical processing or hazardous material assembly. However, to ensure a thorough understanding, it is crucial for the Draft EIR to clarify the specific nature of the intended manufacturing activities and provide detailed information regarding the operational emissions associated with each manufacturing type.

B-3  
(CONT.)

In addition, upon careful examination of Table 3-8 in the Appendix B1\_Air Quality Impact Analysis document,<sup>4</sup> it has come to our attention that a row of data pertaining to On-site Equipment Source is included while the corresponding data for stationary sources is noticeably absent in the CalEEMod output files.<sup>5</sup> This discrepancy raises the need of further clarification and supporting documentation from the Lead Agency regarding the information presented in Table 3-8. Moreover, it is strongly recommended that the Lead Agency conduct a thorough review and revision of the CalEEMod calculations, taking into account both on-site and off-site equipment that will be utilized throughout the operation of the Proposed Project. By incorporating these revisions, the Final EIR will provide a comprehensive and reliable assessment, presenting consistent and conservative emissions data, thus avoiding any discrepancies.

B-4

*Overlapping Construction and Operational Impacts*

Based on the review of the Air Quality Analysis, the Lead Agency have conducted a scenario where construction emissions overlap with operational emissions.<sup>6</sup> However, the combined construction emissions with operational emissions from the overlapping years have been compared to South Coast AQMD's regional air quality CEQA thresholds for construction.<sup>7</sup> To conservatively analyze a worst-case impact scenario, the South Coast AQMD staff recommends that the combined emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA thresholds for operation to determine the level of significance in the Final EIR. By doing so, the Lead Agency will gain valuable insights into the level of significance associated with the project's impact on air quality, enabling them to make well-informed decisions.

B-5

*Localized Significant Thresholds (LSTs) Analysis for Construction and Operational Activities*

The Draft EIR contains a LST analysis of localized air quality construction and operation impacts to sensitive receptors in the vicinity of the Proposed Project as presented in Appendix B1 – Air Quality Impact Analysis, Table 3-10 - Onsite Construction Emissions and Table 3-12- Onsite Operation Emissions.<sup>8</sup> The localized emissions were determined by relying on the Mass Rate LST Look-up Tables developed by South Coast AQMD.<sup>9</sup> However, based on aerial maps provided in the Draft EIR, the footprint of the Proposed Project spans approximately 27.26 acres,

B-6

<sup>4</sup> Appendix B1\_Air Quality Impact Analysis, p. 52.

<sup>5</sup> Ibid. p. 314.

<sup>6</sup> Ibid. p. 53.

<sup>7</sup> Ibid. p. 54.

<sup>8</sup> Ibid p. 61 and p. 63.

<sup>9</sup> South Coast AQMD, Mass Rate LST Look-up Tables: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf>

COMMENT LETTER B

Nathan Perez

June 8, 2023

which is substantially larger than the allowed maximum footprint of five-acres in the Mass Rate LST Look-up Tables. To remedy these inconsistencies, a re-evaluation of the localized air quality impacts from construction and operational emissions using air dispersion modeling, in lieu of relying on the Mass Rate LST Look-up Tables, is more appropriate for accurately predicting the ground-level concentrations needed for the LST analysis because air dispersion modeling takes into account project-specific factors such as: 1) the total acreage to be disturbed; 2) building downwash effects; 3) emissions and location of expected mobile sources, permitted sources, and other sources on-site. Moreover, Since the lead agency have declared that there will be an Overlap construction and operational emissions need to be compared to the LST thresholds, in other words, Air quality Impact from the overlap activities emissions need to be compared to LST thresholds.

Therefore, South Coast AQMD staff recommends that the Lead Agency revise the LST analyses for project construction and operation by conducting air dispersion modeling and including the results of this analysis in either a Revised Draft EIR or Final EIR. If a revised LST analysis is not included in the Revised Draft EIR or Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why.

*Health Risk Assessment (HRA) -*

*Averaging Time Utilized in Construction and Operational HRA Analysis:*

Based on the construction and operational HRA modeling files, the averaging time for the analysis is ANNUAL in AERMOD.<sup>10</sup> However, according to the South Coast AQMD Risk Assessment Procedures v8.1<sup>11</sup> and South Coast AQMD Modeling Guidance for AERMOD,<sup>12</sup> the detailed HRA utilizing AERMOD should be run using the averaging time PERIOD. Since the construction and operational HRAs of the Proposed Project using ANNUAL, South Coast AQMD staff recommend that the Lead Agency re-run the construction and operational HRAs utilizing PERIOD averaging time to determine the health risk impacts to the sensitive receptors and off-site workers and include the revised results in the Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

*Stationary Sources Used During Operation*

In addition, it needs to be clarified in the Final EIR if the stationary combustion engines (e.g., diesel firewater pump, diesel emergency generator, etc.) will be used on-site during operation. If any of these are used when implementing the Proposed Project, they will need to be added as additional sources to the HRA and dispersion modeling files. Therefore, South Coast AQMD staff recommend that the Lead Agency revise the operational HRA modeling by incorporating the above recommendations and including the HRA results in the Final EIR. If the HRA

<sup>10</sup> South Coast AQMD Risk Assessment Procedures v8.1. Access at: <http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf>  
<sup>11</sup> 11 South Coast AQMD Modeling Guidance for AERMOD. Access at: [South Coast AQMD Modeling Guidance for AERMOD](#)  
<sup>12</sup> ORDINANCE NUMBER 1284. Accessed here: <https://www.cityofperris.org/home/showpublisheddocument/2923/637250482796800000>

B-6  
(CONT.)

B-7

B-8

COMMENT LETTER B

Nathan Perez

June 8, 2023

modeling is not revised and included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

B-8  
(CONT.)

*Cumulative Impacts during Project Operation*

The Proposed Project is located within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area. The PVCCSP was approved pursuant to a certified Environmental Impact Report (EIR) on 1/10/2012.<sup>13</sup> Prior to certification of the PVCCSP, a Draft EIR was released for public review and comment between 7/20/2011 – 9/6/2011.<sup>14</sup> During this public review period the South Coast AQMD submitted a comment recommending the Lead Agency include a more robust analysis of cumulative impacts in the Final EIR. The PVCCSP has been revised and amended many times since 2012, the most recent Perris Valley Commerce Center Specific Plan Amendment No. 12, was approved on January 11, 2022.<sup>15</sup> However, the cumulative impacts from the revised projects in PVCCSP are not updated and a robust analysis of cumulative air quality and air toxics impacts from all the projects in PVCCSP is not included in the PVCCSP or this Draft EIR. Per CEQA Guidelines Section 15065(a)(3), South Coast AQMD staff is primarily concerned with the cumulative air quality impacts from increased concentrations of air toxics in the PVCCSP region. Therefore, South Coast AQMD staff recommends that, at minimum, the Lead Agency to perform a qualitative analysis to provide the potential cumulative impacts from air toxics in consideration and listing of all surrounding past, present, and future probable projects. The Lead Agency may also perform a more detailed and robust quantitative analysis of cumulative air toxics and potential health risk implications to be included in the Final Draft EIR.

B-9

*South Coast AQMD Air Permits and Responsible Agency Role*

If construction of the Proposed Project requires using the new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, and etc., air permits from South Coast AQMD will be required. The Revised Draft EIR or Final EIR should include a discussion on stationary and portable equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary and portable sources in the Revised Draft EIR or the Final EIR will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions relative to air permits. General information on air permits is also available on South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

B-10

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), the Lead Agency is required to provide South Coast AQMD written responses to all

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<sup>13</sup> ORDINANCE NUMBER 1284. Accessed here:

<https://www.cityofperris.org/home/showpublisheddocument/2923/637250482796800000>

<sup>14</sup> Final EIR. 9.0 Introduction, Public Review Summary. Page 9.0-1 Accessed here:

<https://www.cityofperris.org/home/showpublisheddocument/2645/637455522835370000>

<sup>15</sup> Perris Valley Commerce Center Specific Plan Amendment No. 12, approved January 11, 2022, available at:

<https://www.cityofperris.org/home/showpublisheddocument/2647/637799977032200000>

**COMMENT LETTER B**

Nathan Perez

June 8, 2023

comments contained herein at least 10 days prior to certifying the Revised Draft EIR or the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with the recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

We appreciate the opportunity to review the Proposed Project. Thank you for considering these comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at [sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov) should you have any questions.

Sincerely,  
*Sam Wang*  
Sam Wang  
Program Supervisor, CEQA IGR  
Planning, Rule Development & Implementation

SW:SG  
RVC230502-03  
Control Number



B-11  
(CONT.)

## **Responses to Comment Letter B**

### **South Coast Air Quality Management District (AQMD)**

- B-1: This introductory comment is acknowledged; no response is required.
- B-2: The commenter provides a Project summary and identifies the nearest sensitive receptors to the Project Site. The commenter is correct in summarizing the Project and identifying the nearest sensitive receptor. No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed. However, for clarification, the Project is proposed by First Industrial Realty Trust. The City of Perris is the Lead Agency for the Project under CEQA.
- B-3: The commenter requests that the Draft EIR clarify the specific nature of the intended manufacturing activities and provide detailed information regarding the operational emissions associated with each manufacturing type. While the tenants and precise use of the building is not known at this time, it is anticipated that emissions associated with any manufacturing uses carried out on the site would be similar to those resulting from the operation of a non-refrigerated warehouse/distribution facility. Additionally, it should be noted that operational activities carried out at the facility would be subject to the requirements of South Coast AQMD Rule 201, which would require the facility operator to obtain a permit to construct prior to installation of any equipment which may emit air contaminants. If a permit is required, these emissions are required to be evaluated during the permit application process and the facility would be required to comply with all applicable South Coast AQMD rules and regulations. No additions, revisions, or corrections to the Draft EIR are needed.
- B-4: The commenter notes that Table 3-8 in the Air Quality Impact Analysis (Technical Appendix B1 of the Draft EIR) includes a row for On-Site Equipment Sources, but that this data is absent from the CalEEMod output files and recommends the review and revision of the CalEEMOD calculations, taking into account both on-site and off-site equipment that will be utilized throughout the operation of the Project. It should be noted that separate CalEEMod runs were prepared for each building and land use (i.e., high-cube fulfillment center and manufacturing). As noted in Section 3.5.4 of the Air Quality Impact Analysis (Appendix B1 of the Draft EIR), a total of three 200 horsepower CNG-powered tractors/loaders/backhoes were assumed to operate at 4 hours per day, 365 days per year. This equipment appears in the CalEEMod outputs for Building 1 Operations – Manufacturing (two pieces of equipment) and Building 2 Operations – Warehouse (one piece of equipment). Thus, no additions, revisions, or corrections to the Draft EIR are needed.
- B-5: The commenter recommends that the combined emissions from the Project's overlapping construction and operational activities be combined and compared to South Coast AQMD's regional air quality CEQA thresholds for operation to determine the level of significance associated with the Project's impact on air quality. As noted in Table 3-3 of the Air Quality Impact Analysis (Appendix B1 of the Draft EIR), it is conservatively assumed that Phase 1 construction activities would be completed in November 2023, and Phase 2 construction activities would be completed in December 2024. As a result, there would be a time period of approximately 13 months where Phase 1 operational activities could overlap with Phase 2 construction activities. A summary of the potential overlap of construction and operational emissions is provided in Table 4.3-9 of the Draft EIR. It

should be noted that South Coast AQMD's significance thresholds for construction are set higher than those for operation due to the relatively short-term nature of construction activities compared to operational activities. Since operational activities are assumed to continue for the operational lifetime of a project, it was determined that it would be most appropriate to compare total emissions during this brief period of construction and operational overlap to South Coast AQMD's construction significance threshold. Thus, no additions, revisions, or corrections to the Draft EIR are needed.

- B-6: The commenter requests that a re-evaluation of localized air quality impacts from construction and operational emissions be completed using air-quality modeling, rather than relying on the Mass Rate Localized Significance Threshold (LST) Look-up Tables, and that air quality impacts from the overlap construction and operational activities emissions be compared to LST thresholds.

Although the Project site is approximately 26.39 acres in size, the analysis conservatively utilized the Mass Rate LST Lookup Tables for a 5-acre site as a screening tool in order to determine whether additional analysis is warranted. This is a conservative approach, as the use of the lookup tables for a 5-acre site assumes that Project emissions would be concentrated over a smaller area, which would result in greater site adjacent concentrations. When Project emissions are spread over a larger site, concentration is reduced. This is demonstrated in the Mass Rate LST Look-up Tables in which the thresholds for 1- and 2-acre sites are lower than those for 5-acre sites. As such, the applicable thresholds for a 26.39-acre site would be much higher than those for a 5-acre site. Additional modeling would only be needed to determine if a significant impact would occur if the localized emissions of the Project exceed any of the LSTs for a 5-acre site.

Although the Project site is approximately 26.39 acres in size, based on the construction equipment mix and assumptions in CalEEMod detailing the disturbance area per piece of equipment, it is estimated that site preparation and grading activities would be limited to approximately 6 acres per day. Because construction activities would be limited to an area of approximately 6 acres in any given day due to the size and quantity of construction equipment, and because the LST lookup tables assume that emissions would be concentrated over a smaller 5-acre area, the use of the Mass Rate LST Lookup Tables for construction is a conservative approach.

Similarly, the Mass Rate LST Lookup Tables were utilized to evaluate operational localized emissions. Because the tables assume that emissions would occur over an area of 5 acres in size, the use of the tables for a larger project site is conservative, as this approach assumes all emissions would be concentrated over an area of approximately 5 acres in size. Because Project construction and operational emissions do not exceed the conservative values in the Mass Rate Lookup Tables, additional modeling is not necessary. Thus, no additions, revisions, or corrections to the Draft EIR are needed.

- B-7: The commenter recommends that the Lead Agency re-run the construction and operational HRAs utilizing PERIOD averaging time instead of ANNUAL in AERMOD to determine health risk impacts to the sensitive receptors and off-site workers and include the revised results in the Final EIR.

It should be noted that the PERIOD and ANNUAL options return identical results. The PERIOD averaging time option averages pollutant concentrations over the entire period of meteorological data, whereas the ANNUAL averaging time option averages pollutant

concentrations over one year. However, per the AERMOD user guide, when multi-year meteorological data sets are used, the ANNUAL option outputs the average of the ANNUAL values across the years of data processed. Since the meteorological data set used for this Project analysis includes five years of data, when the ANNUAL option is selected, the model outputs the average concentration for the entire data set, which would be the same output using the PERIOD option. Therefore, the analysis in the Draft EIR does not need to be revised and impacts continue to be less than significant.

- B-8: The commenter recommends that the operational HRA modeling be revised to clarify whether stationary combustion engines will be used on-site during operation and, if so, add them to the HRA and dispersion modeling files. No stationary combustion engines are proposed as part of the Project, and it is not expected that this equipment will be needed at a later date. However, should any stationary combustion engines be installed in the future, South Coast AQMD permitting requirements as outlined in Rule 219, which detail specific types of equipment that requires a permit would require additional analysis to determine if a permit would be required and to evaluate any potential health risks. Additionally, although emergency generators or fire pumps are not proposed, if they were to be installed, they would operate only on a periodic basis during emergencies and for maintenance and testing purposes. Furthermore, as demonstrated on Pages 4.3-41 to 4.3-42 of the Draft EIR, Project DPM emissions are well below the cancer and non-cancer significance thresholds for residential, worker, and school child exposure scenarios. Thus, no additions, revisions, or corrections to the Draft EIR are needed.
- B-9: The commenter recommends that the Lead Agency perform a qualitative analysis to provide the potential cumulative impacts from air toxics in consideration; provide a list of all surrounding past, present, and future probable impacts; and perform a more detailed and robust quantitative analysis of cumulative air toxics and potential health risk implications.

As discussed in the City's response to the South Coast AQMD's comments on the PVCCSP EIR, (Response to Comment L-4), the PVCCSP was analyzed with a "programmatic" approach (PVCCSP DEIR, p. 3.0-7) and the PVCCSP EIR is considered to be a programmatic document, as defined in Section 15168 of the State CEQA Guidelines. When a programmatic EIR is prepared, later activities, which for the PVCCSP consists of implementing development and infrastructure projects, must be examined to determine whether an additional environmental document is required.<sup>1</sup> This evaluation takes place as part of the City's normal development review process.

Because at the programmatic level, there were no specific implementing development projects proposed or truck trip data available, a meaningful analysis of health risk impacts could not be performed at this stage of master planning. Therefore, the PVCCSP EIR concluded that any such analysis would be, at best, speculative (PVCCSP DEIR, p. 4.2-49) and did not discuss the issue further as allowed per Section 15145 of the State CEQA Guidelines. Thus, the PVCCSP EIR's conclusions related to the individual PVCCSP implementing development and infrastructure projects exposing sensitive receptors to substantial pollutant concentrations were based on the health risks from previously evaluated industrial projects within the PVCCSP vicinity (PVCCSP DEIR Table 4.2-M) and the determination from the General Plan EIR. However, PVCCSP EIR mitigation measure MM Air 15 specifically requires a health risk assessment to identify project-specific impacts

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<sup>1</sup> State CEQA Guidelines Section 15168(c).

resulting from the use of diesel trucks from potential implementing development projects based on the number of dock doors and truck trips.

Additionally, there is currently no methodology to quantify the cumulative areawide or localized health risks from multiple facilities within a community-wide area. The South Coast AQMD is currently in the process of updating their cumulative HRA guidance and has held three working group meetings but has yet to release any guidance detailing the manner in which to evaluate cumulative health risks. Furthermore, no definitive timeline on when guidance is expected has been released. It should be noted that the comment does not provide any guidance on how cumulative health impacts should be evaluated. Notwithstanding, in the absence of any formal guidance, the analysis was performed based on the South Coast AQMD's current guidance, as detailed in the South Coast AQMD's *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. Projects that exceed the project-specific significance thresholds are considered to be cumulatively considerable. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. Because the proposed Project does not exceed the applicable cancer and non-cancer significance thresholds, Toxic Air Contaminants (TAC) emissions generated by the proposed Project would not be considered cumulatively considerable under South Coast AQMD's current guidance.

The City is aware of the toxic air contaminant and health risk conditions within its jurisdiction and surrounding areas. In the northern part of the City of Perris (zip code 92571), the South Coast AQMD's Multiple Air Toxics Exposure Study (MATES) V study identifies a cancer risk of 308 per million. Of this risk, 68.8% is associated with diesel PM. The air toxics cancer risk in this area is higher than only 15% of the South Coast Air Basin population. The cancer risk in the southern part of the City (zip code 92585) is 288 per million. In comparison, the greatest cancer risk in Riverside County is 469 per million within the 92501 zip code of the City of Riverside. The greatest cancer risk within the South Coast Air Basin is 749 per million in downtown Los Angeles. It is not the responsibility of one individual development project to evaluate the potential health risks associated with the existing and future development of all properties within a community planning area. Instead, as per the State CEQA Guidelines, the Project HRA provides an analysis to determine whether the Proposed Project would expose sensitive receptor to substantial DPM pollutant concentrations utilizing the methodologies and thresholds of significance recommended for individual development projects by the South Coast AQMD. Thus, no additions, revisions, or corrections to the Draft EIR are needed.

- B-10: The commenter requests that if construction of the Project requires new stationary and portable sources (such as, boilers, heaters, ovens, emergency generators, fire pumps, etc.) that require South Coast AQMD permits, the Draft EIR should include a discussion of such equipment and list the South Coast AQMD as a Responsible Agency for the Project. The City of Perris acknowledges that permits from the South Coast AQMD may be required and that the South Coast AQMD is a Responsible Agency pursuant to the CEQA. The South Coast AQMD is identified as an agency that will use the EIR for issuance of permits and approvals on Table 3-4, *Project Related Approval/Permits*, of the Draft EIR, and in Section 1.4.4, *Required Permits and Discretionary Actions*, of this Final EIR. Refer to Response to Comment B-8. Thus, no additions, revisions, or corrections to the Draft EIR are needed.

B-11: The commenter requests written responses to all their comments at least 10 days prior to certifying the Revised Draft EIR or Final EIR and detailed reasons supported by substantial evidence for comments that are not accepted. The City of Perris has complied with the requirements of Section 21092.5 of the Public Resources Code and has prepared written responses to environmental comments provided to the City during the 45-day public review period. In compliance with CEQA, the South Coast AQMD will be provided with written responses to their comments at least 10 days prior to certification of the Final EIR. In addition, the Planning Commission will have the Final EIR, including responses to comments, for their review and consideration prior to taking any action on the proposed Project and the Final EIR. Therefore, no further response is required.

COMMENT LETTER C



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
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Ontario, CA 91764  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



June 12, 2023

Mr. Nathan Perez  
Senior Planner  
135 North “D” Street  
Perris, CA 92570  
NPerez@cityofperris.org

**Subject: Draft Environmental Impact Report, First March Logistics Project, State Clearinghouse No. 2021120497, City of Perris, Riverside County**

Dear Mr. Perez:

The California Department of Fish and Wildlife (CDFW) received a Draft Environmental Impact Report (DEIR) from the City of Perris (City) for the First March Logistics Project (Project) for the City of Perris (Project Applicant/Proponent) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines<sup>1</sup>.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**CDFW ROLE**

CDFW is California’s Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may

<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The “CEQA Guidelines” are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in “take”, as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

CDFW issued Natural Community Conservation Plan approval and take authorization in 2004 for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), as per Section 2800, *et seq.*, of the California Fish and Game Code. The MSHCP established a multiple species conservation program to minimize and mitigate habitat loss and the incidental take of covered species in association with activities covered under the permit. CDFW is providing the following comments as they relate to the Project’s consistency with the MSHCP and CEQA.

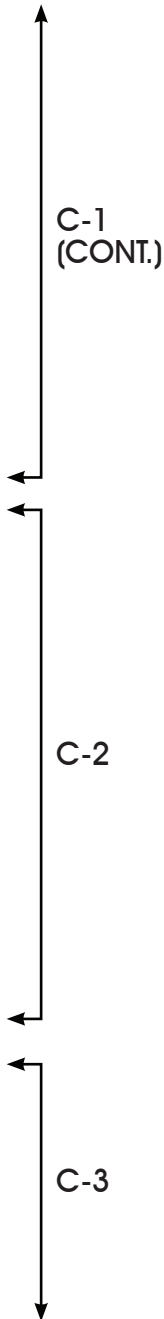
**PROJECT DESCRIPTION AND SUMMARY**

**Description:** The City of Perris (City; Lead Agency) and First Industrial Realty Trust, Inc (Project Applicant) are proposing the First March Logistics Project (Project). The proposed Project will consist of the construction and operation of two warehouse buildings—Building 1 (419,034 square feet [sf]) and Building 2 (125,341 sf)—totaling 544,375 sf and associated on-site parking and landscaping, and roadway and infrastructure improvements. The Project would be constructed in two phases: 1) Building 1 on 20.0 acres and a detention basin on 6.4 acres (between Natwar Lane and Western Way) would be constructed by 2023, and 2) Building 2 would replace the detention basin by 2025.

**Location:** The Project site is located between Nandina Avenue on the south, March Air Reserve Base and Western Way on the east, undeveloped land to the north, and Interstate 215 on the west, in the City of Perris, Riverside County, California, in Township 3 South, Section 25, Range 4 West, of the U.S. Geological Survey 7.5”, California Steele Peek topographic quadrangle map; Assessor’s Parcel Numbers 295-300-005, -017, 294-180-013, -028, -029, -030, and -032.

**COMMENTS AND RECOMMENDATIONS**

Based on the documents for review, CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project’s significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions are also included to improve the environmental document. CDFW recommends the additional measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project’s CEQA mitigation,



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monitoring and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

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(CONT.)

**Western Riverside County Multiple Species Habitat Conservation Plan**

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the MSHCP as a result of this Project is necessary to address CEQA requirements. The proposed Project occurs within the MSHCP area and is subject to the provisions and policies of the MSHCP.

To be considered a covered activity, Permittees need to demonstrate that proposed actions are consistent with the MSHCP, the Permits, and the Implementing Agreement. The City is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. To demonstrate consistency with the MSHCP, as part of the CEQA review, the City shall ensure the Project pays Local Development Mitigation Fees and other relevant fees as set forth in Section 8.5 of the MSHCP; and demonstrates compliance with: 1) the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (Section 6.1.2 of the MSHCP); 2) the Protection of Narrow Endemic Plant Species (Section 6.1.3 of the MSHCP); 3) the Urban/Wildlands Interface Guidelines (Section 6.1.4 of the MSHCP); 4) the policies set forth in Section 6.3.2; and 5) the Best Management Practices and the siting, construction, design, operation and maintenance guidelines as set forth in Section 7.0 and Appendix C of the MSHCP.

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**Specific Comments**

**Comment #1: Protection of Riparian/Riverine and Vernal Pool Resources (MSHCP Section 6.1.2)**

The procedures described in the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools section of the MSHCP (MSHCP Section 6.1.2) are to ensure that the biological functions and values of these areas are maintained throughout the MSHCP Plan Area (including all areas of the Plan located outside the Criteria Area). Additionally, this process helps identify areas to consider for priority acquisition, as well as those functions that may affect downstream values related to Conservation of Covered Species within the MSHCP Conservation Area. The assessment of riparian/riverine and vernal pool resources may be completed as part of the CEQA review process as set forth in Article V of the State CEQA Guidelines. However, the MSHCP identifies that the U.S. Fish and Wildlife Service and CDFW shall be notified in advance of approval of public or private projects of draft determinations for the biologically equivalent or superior determination findings associated with the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools policies presented in Section 6.1.2 of the MSHCP (MSHCP Section 6.11).

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The MSHCP identifies that assessment of these areas include identification and mapping of riparian/riverine areas and vernal pools. The assessment shall consider species composition, topography/ hydrology, and soil analysis, where appropriate. The documentation for the assessment shall include mapping and a description of the functions and values of the mapped areas with respect to the species identified in Section 6.1.2 of the MSHCP. Factors to be considered include hydrologic regime, flood storage and flood-flow modification, nutrient retention and transformation, sediment trapping and transport, toxicant trapping, public use, wildlife Habitat, and aquatic Habitat.

The MSHCP identifies that for mapped riparian/riverine and vernal pool resources that are not included in the MSHCP Conservation Area, applicable mitigation under CEQA, shall be imposed by the Permittee (in this case the Lead Agency). Further, the MSHCP identifies that to ensure the standards in Section 6.1.2 are met, the Permittee shall ensure that, through the CEQA process, project applicants develop project alternatives demonstrating efforts that first avoid, and then minimize direct and indirect effects to the wetlands mapped pursuant to Section 6.1.2. If an avoidance alternative is not feasible, a practicable alternative that minimizes direct and indirect effects to riparian/riverine areas and vernal pools and associated functions and values to the greatest extent possible shall be selected. Those impacts that are unavoidable shall be mitigated such that the lost functions and values as they relate to Covered Species are replaced as through the Determination of Biologically Equivalent or Superior Preservation (DBESP).

The City is required to ensure the Applicant completes the DBESP process prior to completion of the EIR to demonstrate implementation of MSHCP requirements in the CEQA documentation.

CDFW appreciate the analysis of impacts provided within the DEIR and General Biological Resource Assessment. However, the MSHCP implementation process is not complete because although a DBESP has been prepared, it has not been submitted to CDFW for review and response, to determine if the mitigation proposed for the impacts to riparian/riverine resources is biologically equivalent or superior preservation to avoidance. It is not appropriate for the City to adopt the final EIR until the DBESP is complete because the City is required to notify CDFW in advance of approval of public and private projects for identified MSHCP activities, such as completion of the DBESP for the riparian/riverine policy. CDFW requests that to demonstrate implementation of the MSHCP, the City of Perris complete the DBESP process by submitting the DBESP to both CDFW and the U.S. Fish and Wildlife Service for review and comment prior to adoption of the Final Environmental Impact Report. Once the DBESP is complete, revise the Biological Mitigation Measure 4-2 (MM 4-2) and update with the mitigation measures identified in the DBESP.

**Recommended Potentially Feasible Mitigation Measure(s):**

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(CONT.)

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CDFW recommend revising Mitigation Measure 4-2 in the DEIR per the edits below (edits are in ~~strikethrough~~ and **bold**), and also included in Attachment 1 “Mitigation Monitoring and Reporting Program”:

**Mitigation Measure 4-2:** The Project Proponent shall compensate for permanent impacts to 0.15 acre of riparian area and 0.03 acre of riverine area at a **minimum of 3:1** mitigation-to-impact ratio through the purchase of ~~0.36~~ **acre of either or a combination of** rehabilitation, re-establishment, and/or establishment mitigation credits at an approved mitigation bank or ~~in-lieu-fee program~~ within the San Jacinto River and/or Santa Ana River Watershed, such as the Riverpark Mitigation Bank. If enhancement or preservation credits are pursued due to the lack of availability of rehabilitation, re-establishment, and/or establishment mitigation credits, the ratio may be higher as determined on a case by-case basis by the wildlife agencies.

**Comment #2: Impacts to Aquatic and Riparian Resources; Lake and Streambed Alteration Agreement (LSAA)**

**Issue:** Based on review of material submitted with the DEIR and review of aerial photography, the Project has the potential to impact fish and wildlife resources subject to Fish and Game Code section 1600 et seq.

**Specific Impact:** Based on review of material submitted with the DEIR and review of aerial photography, the Project has the potential to impact fish and wildlife resources subject to Fish and Game Code section 1600 et seq. The DEIR identified 0.18 acres of riparian/resources within the study area. The Project activities have the potential to impact fish and wildlife resources through the deposition of debris, waste or other materials that could pass into any river, stream, or lake.

**Why Impact Would Occur:** Project-related activities could potentially alter drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.

**Evidence Impact Would Be Significant:** The Project may substantially adversely affect the existing stream pattern and geomorphologic processes of the Project site through the deposition of debris, waste or other materials that could pass into any river, stream or lake. Depending on how the Project is designed and constructed, it is likely that the Project applicant will need to notify CDFW per Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris,

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waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow.

Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify the project that would eliminate or reduce harmful impacts to fish and wildlife resources.

CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code, § 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package, please go to <https://www.wildlife.ca.gov/Conservation/LSA/Forms>.

**Recommended potentially feasible mitigation measure(s):**

**Mitigation Measure #1:** To ensure compliance with Fish and Game Code section 1602 CDFW recommends that the City condition the final EIR to include a mitigation measure for consultation with CDFW to determine if Fish and Game Code section 1600 et seq. resources may occur within the proposed Project alignment.

CDFW recommends the inclusion of the following measure in the final EIR per the edits below (edits are in ~~strike through~~ and **bold**), and also included in Attachment 1 "Mitigation Monitoring and Reporting Program":

**Mitigation Measure 4-3: Prior to the issuance of a grading permit for the Project and prior to the start of Project activities, the Applicant shall notify the California Department of Fish and Wildlife (CDFW) for impacts to Fish and Game Code section 1602 resources. The applicant shall either receive a Streambed Alteration Agreement (SAA) or written documentation from CDFW that a Streamed Alteration Agreement is not needed.**

The notification to CDFW should provide the following information:

1. A stream delineation including the bed, bank and channel;

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(CONT.)

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2. **Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Project. This includes impacts as a result of routine maintenance and fuel modification. Plant community names should be provided based on vegetation association and/or alliance per the Manual of California Vegetation (Sawyer et al 2009);**
3. **A discussion as to whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and**
4. **A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site.**

**All mitigation measures and conditions contained within the above permits shall be implemented. At a minimum, the following shall be completed for mitigation for impacts to waters of the state and jurisdictional streambed:**

1. **The Project Proponent shall compensate for permanent impacts to 0.03 acre of Regional Board jurisdiction and 0.18 acre of CDFW jurisdiction at a 2:1 mitigation to impact ratio through the purchase of 0.36 acre of rehabilitation (inclusive of the 0.03 acre of Regional Board jurisdiction collectively within the 0.18 acre of CDFW jurisdiction), reestablishment, and/or establishment mitigation credits at an approved mitigation bank or in-lieu fee program within the San Jacinto River and/or Santa Ana River Watershed, such as the Riverpark Mitigation Bank. **no less than 3:1 for impacts to streams and associated natural communities, or at a ratio acceptable to CDFW per a LSA Agreement. Mitigation should occur within the Western Riverside County.** If enhancement or preservation credits are pursued due to the lack of availability of rehabilitation, reestablishment, and/or establishment mitigation credits, the ratio may be higher as determined on a case-by-case basis by the Regional Board and/or CDFW. The mitigation receipt from this fee payment will be provided to the Lead Agency prior to initiation of jurisdictional impacts. **On-site mitigation measures may include the enhancement of existing streams. A conceptual Habitat Mitigation and Monitoring Plan shall be prepared, if necessary, for the enhancement activities to address impacts to Fish and Game Code section 1602 resources, which may include non-native species removal and revegetation followed by periodic monitoring. The plan shall specify the criteria and standards****

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(CONT.)

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**by which the enhancement actions will compensate for impacts of the project on streams.**

**Additional Recommendations**

**Weed Management Plan.** A weed management plan should be developed for the Project site and implemented during the duration of this long-term Project. On-going soil disturbance promotes establishment and growth of non-native weeds. As part of the Project, non-native weeds should be prevented from becoming established. The Projects site should be monitored via mapping for new introductions and expansions of non-native weeds.

**Mitigation and Monitoring Reporting Plan**

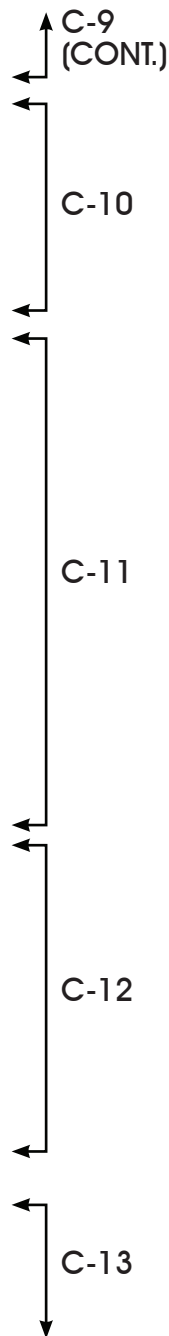
CDFW recommends updating the DEIR's proposed Biological Resources Mitigation Measures to include mitigation measures recommended in this letter. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments [(Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15126.4(a)(2)]. As such, CDFW has provided comments and recommendations to assist the City in developing mitigation measures that are (1) consistent with CEQA Guidelines section 15126.4; (2) specific; (3) detailed (i.e., responsible party, timing, specific actions, location), and (4) clear for a measure to be fully enforceable and implemented successfully via mitigation, monitoring, and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment 1).

**ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

**ENVIRONMENTAL DOCUMENT FILING FEES**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of



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environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

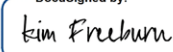
C-13  
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**CONCLUSION**

CDFW appreciates the opportunity to comment on the DEIR for the First March Logistics Project, State Clearinghouse No. 2021120497, to assist in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts. CDFW requests that the City of Perris addresses CDFW's comments and concerns prior to adoption of the DEIR for the Project.

Questions regarding this letter or further coordination should be directed to Katrina Rehrer, Environmental Scientist, at [katrina.rehrer@wildlife.ca.gov](mailto:katrina.rehrer@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
84F92FFEEFD24C8...

Kim Freeburn  
Environmental Program Manager

ec: **California Department of Fish and Wildlife**  
Carly Beck, Senior Environmental Scientist  
[Carly.Beck@wildlife.ca.gov](mailto:Carly.Beck@wildlife.ca.gov)

**U.S. Fish and Wildlife Service**  
Karin Cleary-Rose  
[Karin\\_Cleary-Rose@fws.gov](mailto:Karin_Cleary-Rose@fws.gov)

**Western Riverside County Regional Conservation Authority**  
Tricia Campbell  
[tcampbell@rctc.org](mailto:tcampbell@rctc.org)

**Western Riverside County Regional Conservation Authority**  
Aaron Gabbe  
[agabbe@rctc.org](mailto:agabbe@rctc.org)

Office of Planning and Research, State Clearinghouse, Sacramento  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)

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State of California – Natural Resources Agency  
 DEPARTMENT OF FISH AND WILDLIFE  
 Inland Deserts Region  
 3602 Inland Empire Boulevard, Suite C-220  
 Ontario, CA 91764  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

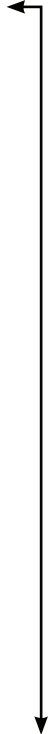
*GAVIN NEWSOM, Governor*  
*CHARLTON H. BONHAM, Director*



**Attachment A: Draft Mitigation and Monitoring Reporting Plan**

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

Biological Resources (BIO)			
	Mitigation Measure (MM)	Timing	Responsible Party
<b>Protection of Riparian/Riverine and Vernal Pool Resources (MSHCP Section 6.1.2)</b>	<b>Mitigation Measure 4-2:</b> The Project Proponent shall compensate for permanent impacts to 0.15 acre of riparian area and 0.03 acre of riverine area at a minimum of 3:1 mitigation-to-impact ratio through the purchase of either or a combination of rehabilitation, re-establishment, and/or establishment mitigation credits at an approved mitigation bank within the San Jacinto River and/or Santa Ana River Watershed, such as the Riverpark Mitigation Bank. If enhancement or preservation credits are pursued due to the lack of availability of rehabilitation, re-establishment, and/or establishment mitigation credits, the ratio may be higher as determined on a case by-case basis by the wildlife agencies.	Prior to commencing ground- or vegetation disturbing activities	City of Perris
<b>Impacts to Aquatic and Riparian Resources</b>	<b>Mitigation Measure 4-3:</b> Prior to the issuance of a grading permit for the Project and prior to the start of Project activities, the Applicant shall notify the California Department of Fish and Wildlife (CDFW) for impacts to Fish and Game Code section 1602 resources. The applicant shall either receive a Streambed Alteration Agreement (SAA) or written documentation from CDFW that a Streamed Alteration Agreement is not needed.  The notification to CDFW should provide the following information:  1. A stream delineation including the bed, bank and	Prior to commencing ground- or vegetation disturbing activities	Project Proponent



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	<p>channel;</p> <ol style="list-style-type: none"> <li>2. Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Project. This includes impacts as a result of routine maintenance and fuel modification. Plant community names should be provided based on vegetation association and/or alliance per the Manual of California Vegetation (Sawyer et al 2009);</li> <li>3. A discussion as to whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and</li> <li>4. A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site.</li> </ol> <p>All mitigation measures and conditions contained within the above permits shall be implemented. At a minimum, the following shall be completed for mitigation for impacts to waters of the state and jurisdictional streambed:</p> <ol style="list-style-type: none"> <li>1. The Project Proponent shall compensate for permanent impacts to 0.03 acre of Regional Board jurisdiction and 0.18 acre of CDFW jurisdiction at no less than 3:1 for impacts to streams and associated natural communities, or at a ratio acceptable to CDFW per a LSA Agreement. Mitigation should occur within the Western Riverside County. On-site mitigation measures may include the enhancement of existing streams. A conceptual Habitat</li> </ol>		
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	Mitigation and Monitoring Plan shall be prepared, if necessary, for the enhancement activities to address impacts to Fish and Game Code section 1602 resources, which may include non-native species removal and revegetation followed by periodic monitoring. The plan shall specify the criteria and standards by which the enhancement actions will compensate for impacts of the project on streams.		
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C-15  
(CONT.)

## **Responses to Comment Letter C**

### **California Department of Fish and Wildlife (CDFW)**

- C-1: The commenter provides introductory comments explaining the CDFW's role as California's Trustee Agency for fish and wildlife resources, its role as a Responsible Agency for the Project, and information regarding the Western Riverside County Multiple Species Habitat conservation Plan (MSHCP). This comment is acknowledged and no further response is needed.
- C-2: The commenter provides a description of the Project and the Project location. The commenter is correct in stating the Project description and location. No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.
- C-3: The commenter states that they have provided Project comments and recommendations and recommends that additional measures or revisions be included in a science-based monitoring program containing adaptive management strategies as part of the Project's CEQA mitigation, monitoring, and reporting program. The Draft EIR's proposed biological resources mitigation measures have been revised per the CDFW recommendations. Refer to Responses to comment C-5 through C-9 and Section 3.0, *Draft EIR Clarifications and Revisions*, of the Final EIR for the revised mitigation measures for biological resources impacts.
- C-4: The commenter states that because the Project site is within the MSHCP area and subject to the provisions and policies of the MSHCP, an assessment of impacts to the MSHCP as a result of the Project is required. This includes a demonstration that the Project is consistent with the MSHCP, its permits, and the implementing agreement. As discussed in Section 4.4, *Biological Resources*, of the Draft EIR, the Project's compliance with the Western Riverside County MSHCP's Reserve Assembly Requirements as well as other applicable MSHCP requirements were analyzed (Draft EIR pp. 4.4-27 to 4.4-29).
- 1) The Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (Section 6.1.2 of the MSHCP): In compliance with MSHCP Section 6.1.2, a DBESP has been prepared for the Project's impacts to riparian/riverine areas, which is contained as Appendix C2 of the Draft EIR. The DBESP requires that riparian resources be mitigated at a 2:1 ratio through the purchase of 0.36 acre of rehabilitation, re-establishment, and/or establishment mitigation credits at an approved mitigation bank or in-lieu fee program within the San Jacinto River and/or Santa Ana River Watershed, such as the Riverpark Mitigation Bank. With the implementation of the mitigation provided by the DBESP (Project-level mitigation measure MM 4-2, as revised in Response to Comment C-7), the Project would not conflict with Section 6.1.2 of the Western Riverside County MSHCP. (Draft EIR p. 4.4-27)
  - 2) The Protection of Narrow Endemic Plant Species (Section 6.1.3 of the MSHCP): The Project site is not located in the Narrow Endemic Plant Species Survey Areas; therefore, the Project would be consistent with Section 6.1.3 of the MSHCP. (Draft EIR p. 4.4-28)
  - 3) The Urban/Wildlands Interface Guidelines (Section 6.1.4 of the MSHCP): The Project site and its surrounding environs have been routinely disturbed and maintained for decades, and do not comprise a wildlife movement corridor; rather, the area is already

fragmented by existing industrial development, the I-215 Freeway, and MARB/IPA. The development of an industrial building and its associated improvements would not result in further fragmentation than what already exists and would not result in lower functions and values of natural open space for native species or other effects associated with such natural open space. The Project site does not occur in proximity to the MSHCP Conservation Area; therefore, the MSHCP Urban/Wildland Interface Guidelines do not apply to the Project. (Draft EIR p. 4.4-28)

- 4) The Policies set forth in Section 6.3.2 of the MSHCP: In accordance with Section 6.3.2 of the MSHCP, Additional Survey Needs and Procedures, additional surveys may be needed for certain species in order to achieve coverage for these species. The query of the Regional Conservation Authority (RCA) MSHCP Information Map and review of the MSHCP determined that the Project site is located within the designated survey area for burrowing owl as depicted in Figure 6-4 within Section 6.3.2 of the MSHCP. The required focused surveys for burrowing owl have been conducted and no burrowing owls or signs were observed on or within 500 feet of the Project site, where accessible, during the focused surveys. As a result, burrowing owl are presumed absent from the Project site. However, a pre-construction survey for resident burrowing owls shall occur within 30 days prior to commencement of construction activities as required by Project-level mitigation measure MM 4-1. As the Project site does not occur within amphibian and/or mammal survey areas, no amphibian and/or mammal surveys are required. As the Project site does not occur within the Criteria Area Plant Species Survey Area, no criteria area plant species surveys are required. (Draft EIR pp. 4.4-28 to 4.4-29)
- 5) The Best Management Practices (BMPs) and the siting, construction, design, operation and maintenance guidelines as set forth in Section 7.0 and Appendix C of the MSHCP. As applicable, construction of the Project would implement best management practices identified in *Volume I, Appendix C* of the MSHCP. The following are a list of relevant BMPs that will be addressed by the Project:
  - A condition shall be placed on grading permits requiring a qualified biologist to conduct a training session for project personnel prior to grading. The training shall include a description of the species of concern and its habitats, the general provisions of the Endangered Species Act (Act) and the MSHCP, the need to adhere to the provisions of the Act and the MSHCP, the penalties associated with violating the provisions of the Act, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project site boundaries within which the project activities must be accomplished.
  - Water pollution and erosion control plans shall be developed and implemented in accordance with RWQCB requirements.
  - The footprint of disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via pre-existing access routes to the greatest extent possible.

- Projects should be designed to avoid the placement of equipment and personnel within a stream channel or on sand and gravel bars, banks, and adjacent upland habitats used by target species of concern.
- Projects that cannot be conducted without placing equipment or personnel in sensitive habitats should be timed to avoid the breeding season of riparian birds identified in MSHCP Global Species Objective No. 7.
- Equipment storage, fueling, and staging areas shall be located on upland sites with minimal risks of direct drainage into riparian areas or other sensitive habitats. These designated areas shall be located in such a manner as to prevent any runoff from entering sensitive habitat. Necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters. Project related spills of hazardous materials shall be reported to appropriate entities including but not limited to the City of Perris, the U.S. Fish and Wildlife Service (USFWS), the California Department of Fish and Wildlife (CDFW), the Regional Water Quality Control Board (Regional Board) and shall be cleaned up immediately and contaminated soils removed to approved disposal areas.
- The qualified project biologist shall monitor construction activities for the duration of the project (where applicable) to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and species of concern outside the project footprint.
- To avoid attracting predators of the species of concern, the Project site shall be kept as clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site(s).
- Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed project footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction limits will be fenced with orange snow screen. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.
- The Permittee shall have the right to access and inspect any sites of approved projects including any restoration/enhancement area for compliance with project approval conditions including these BMPs.

Although the Project would implement best management practices pursuant to the MSHCP and condition the project as identified above, in order to further ensure compliance, the following mitigation measure has been added to the Project Final EIR. The mitigation measure further supports the conclusions in the Draft EIR and is not evidence of a new or greater impact not previously disclosed.

**MM 4-5** **Prior to the issuance of grading permits, the Project Applicant shall place a note on the grading plans to require that a qualified biologist conducts a training session for project personnel prior to any grading activities. The training shall include a description of the species of**

**concern and its habitats, the general provisions of the Endangered Species Act (Act) and the MSHCP, the need to adhere to the provisions of the Act and the MSHCP, the penalties associated with violating the provisions of the Act, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project site boundaries within which the project activities must be accomplished.**

In addition, the Project Applicant is required to contribute a local mitigation fee, which requires a fee payment to assist the City in implementing the Western Riverside County MSHCP reserve system. No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.

- C-5: The commenter describes the procedures provided in the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools section of the MSHCP and the assessment requirements for riparian/riverine and vernal pool resources as part of the CEQA review process. As discussed in Section 4.4, *Biological Resources*, of the Draft EIR, the Project would permanently impact approximately 0.18 acre of MSHCP riparian/riverine areas within Drainage A located on the southern portion of the Project site. Given the low quality of riparian habitat onsite, the Project site does not provide suitable habitat for riparian species including least Bell's vireo, southwestern willow flycatcher, and/or western yellow-billed cuckoo. Impacts to riparian/riverine areas must be mitigated such that the resulting Project, with mitigation, is biologically equivalent or superior to the existing site conditions. As such, a Determination of Biologically Equivalent or Superior Preservation (DBESP) is required, which represents a potentially significant impact.

In compliance with MSHCP Section 6.1.2, a DBESP has been prepared for the Project's impacts to riparian/riverine areas, which is contained as Appendix C2 of the Draft EIR. The DBESP requires that riparian resources be mitigated at a 2:1 ratio through the purchase of 0.36 acre of rehabilitation, re-establishment, and/or establishment mitigation credits at an approved mitigation bank or in-lieu fee program within the San Jacinto River and/or Santa Ana River Watershed, such as the Riverpark Mitigation Bank. With the implementation of the mitigation provided by the DBESP (Project-level mitigation measure MM 4-2, as revised in Response to Comment C-7), the Project would not conflict with Section 6.1.2 of the Western Riverside County MSHCP. Moreover, no vernal pools occur on the Project site; therefore, no impact to vernal pools or vernal pool species including listed fairy shrimp would occur as a result of the Project (Draft EIR pp. 4.4-27 to 4.4-28). No additions, revisions, or corrections to the Draft EIR are needed.

- C-6: The commenter informs that the MSHCP process is not complete until the Determination of Biologically Equivalent or Superior Preservation (DBESP) that has been prepared for the Project be submitted to the CDFW for review and response. As discussed in Section 4.4, *Biological Resources*, in compliance with MSHCP Section 6.1.2, a DBESP has been prepared for the Project's impacts to riparian/riverine areas, which is contained as Appendix C2 of the Draft EIR (Draft EIR p. 4.4-27). The DBESP was reviewed by the City prior to publication of the Draft EIR and has been submitted to the Western Riverside County Regional Conservation Authority (RCA) and the CDFW as required on October 2, 2023. On November 20, 2023, Wildlife Agencies have comments to the DBESP and requested revision for MM 4-2. As shown below, mitigation measure MM 4-2 has been revised accordingly.

C-7: The commenter provides a recommendation for revising mitigation measure MM 4-2. Subsequently, Katrina Rehrer, Environmental Scientist from the Inland Deserts Region of CDFW, reviewed the Project's updated DBESP and provided additional recommendation for mitigation measure MM 4-2. In response to this comment and further request from the Wildlife Agencies based on the review of the updated DBESP, mitigation measure MM 4-2 in the Draft EIR has been revised pursuant to the commenter's latest recommendations. The revised mitigation measure further supports the conclusions in the Draft EIR and is not evidence of a new or greater impact not previously disclosed.

MM 4-2 The Project Proponent shall compensate for **0.18 acres of permanent impacts to MSHCP riparian/riverine resources** through the purchase of **at least 0.18 acres of riparian establishment mitigation credits and 0.36 acre** of a combination of rehabilitation, re-establishment, and/or establishment mitigation credits at an approved mitigation bank ~~or in-lieu fee program within the San Jacinto River and/or Santa Ana River Watershed~~, such as the Riverpark Mitigation Bank. If enhancement or preservation credits are pursued due to the lack of availability of rehabilitation, re-establishment, and/or establishment mitigation credits, the ratio may be higher as determined on a case-by-case basis by the wildlife agencies.

**The Project Proponent shall provide proof of the completed purchase of the mitigation credits to the City and the Wildlife Agencies prior to the issuance of grading permit for the Project. Proof of purchase would consist of (1) a receipt from the Riverpark Mitigation Bank for the Project Proponent's purchase of at least 0.18 acres of riparian establishment mitigation credits and 0.36 acres of establishment, re-establishment, or rehabilitation credits, plus (2) a copy of the purchase contract/purchase agreement between the Riverpark Mitigation Bank and the Applicant. The purchase agreement should name the First March Logistics Project as the development project for which the mitigation credits are being purchased.**

C-8: The commenter states that the Project has the potential to impact fish and wildlife resources subject to Fish and Game Code section 1600 et seq. and that the CDFW must be notified prior to Project activities in order to determine if Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. As discussed in Section 4.4, *Biological Resources*, of the Draft EIR, the Project would permanently impact Drainage A and its associated approximately 0.03-acre (722 linear feet) of Corps and Regional Water Quality Control Board (RWQCB) jurisdiction, none of which consists of State wetlands and 0.18 acre of CDFW jurisdiction, 0.15 acre of which is riparian. Therefore, impacts to riparian habitats and jurisdictional waters would be potentially significant. However, with Project-level mitigation measures MM 4-2 and MM 4-3, Project impacts would be less than significant. Refer to Response to Comments C-7 and C-9 for the revisions to mitigation measures MM 4-2 and MM 4-3, as requested by the commenter. No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.

C-9: The commenter recommends that the City condition the Final EIR to include a mitigation measure for consultation with CDFW to determine if Fish and Game Code 1600 et seq.

resources may occur with the Project and provides requested text for the mitigation measure. Subsequently, Katrina Rehrer, Environmental Scientist from the Inland Deserts Region of CDFW, reviewed the Project's updated DBESP and provided additional recommendations for mitigation measure MM 4-3. In response to this comment and further request from the Wildlife Agencies based on the review of the updated DBESP, mitigation measure MM 4-3 in the Draft EIR has been revised pursuant to the commenter's latest recommendations. The revised mitigation measure further supports the conclusions in the Draft EIR and is not evidence of a new or greater impact not previously disclosed.

MM 4-3 **Prior to the issuance of a grading permit for the Project and prior to the start of Project activities, the Applicant shall notify the California Department of Fish and Wildlife (CDFW) of impacts to Fish and Game Code section 1602 resources. The Applicant shall either receive a Streambed Alteration Agreement (SAA) or written documentation from CDFW that a SAA is not needed.**

**The notification to the CDFW should provide the following information:**

- **A stream delineation including the bed, bank and channel;**
- **Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Project. This includes impacts as a result of routine maintenance and fuel modification. Plant community names should be provided based on vegetation association and/or alliance per the Manual of California Vegetation (Sawyer et al 2009);**
- **A discussion as to whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and**
- **A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site.**

**All mitigation measures and conditions contained within the above permits shall be implemented. At a minimum, the following shall be completed for mitigation for impacts to waters of the state and jurisdictional streambed:**

The Project Proponent shall compensate for permanent impacts to 0.03 acre of Regional Board jurisdiction **and 0.18 acre of CDFW jurisdiction** ~~At a 2:1 mitigation-to-impact ratio~~ through the purchase of 0.36 acre of ~~rehabilitation establishment, re-establishment, or rehabilitation credits~~ **and 0.18 acres of riparian establishment mitigation credits** (inclusive

of the 0.03 acre of Regional Board jurisdiction collectively within the 0.18 acre of CDFW jurisdiction), ~~reestablishment, and/or establishment mitigation credits~~ at an approved mitigation bank or in-lieu fee program within the San Jacinto River and/or Santa Ana River Watershed, such as the Riverpark Mitigation Bank. If enhancement or preservation credits are pursued due to the lack of availability of rehabilitation, re-establishment, and/or establishment mitigation credits, the ratio may be higher as determined on a case-by-case basis by the Regional Board and/or CDFW. The mitigation receipt from this fee payment will be provided to the Lead Agency prior to initiation of jurisdictional impacts.

- C-10: The commenter recommends that a weed management plan be developed for the Project site and implemented during the duration of Project. The Project site is currently routinely maintained (i.e., disked) for weed abatement and would continue until construction of the Project. No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.
- C-11: The commenter recommends updating the Draft EIR's proposed Biological Resources Mitigation Measures to include the mitigation measures provided in their comments. The Draft EIR's proposed Biological Resources mitigation measures have been revised per the commenter's recommendations. Refer to Response to Comments C-7 and C-9 above and Section 3.0, *Draft EIR Clarifications and Revisions*, of the Final EIR for the revised mitigation measures for biological resources impacts.
- C-12: The commenter requests that any special status species and natural communities detected during Project surveys be reported to the California Natural Diversity Database (CNDDDB). As discussed in Section 4.4, *Biological Resources*, one special-status plant species (*paniculate tarplant*) was observed on the Project site during field surveys. The *paniculate tarplant* is classified as a rare plant by CNPS, but it is not a federally- or State-listed species. There are no survey or preservation requirements for this species pursuant to any resource agency or HCP, including the MSHCP. Additionally, the Project site is heavily disturbed and the population of *paniculate tarplant* on-site is relatively small, as approximately 35 individuals were observed. Therefore, given the low sensitivity of this species (CNPS 4.2), the removal of the *paniculate tarplant* as required by the Project would not have a substantial adverse effect on the survivorship of the *paniculate tarplant*. Impacts to special-status plant species would be less than significant and no mitigation is required. (Draft EIR p. 4.4-20).

One special-status animal species (golden eagle) was observed flying over the Project site on November 8, 2019. The Project site also would result in the loss of habitat with varying degrees of potential to support foraging by the following special-status species: the loggerhead shrike, Swainson's hawk, white-tailed kite, and San Diego black-tailed jackrabbit. Given the relatively small size and highly disturbed nature of the Project site, any potential impacts to golden eagle, loggerhead shrike, Swainson's hawk, white-tailed kite, and San Diego black-tailed jackrabbit would be less than significant. Additionally, all of these species are Covered Species under the MSHCP; therefore, the MSHCP addresses the loss of foraging habitat for these species (Draft EIR pp. 4.4-20 to 4.4-21).

Natural communities detected include the MSHCP riparian/riverine areas within the Project site, comprised entirely of Drainage A (743 linear feet of ephemeral streambed) and are identical to that of CDFW jurisdiction. The entirety of MSHCP riparian/riverine

areas within the Project site would be permanently impacted; no temporary or off-site impacts are currently proposed. (Draft EIR pp. 4.4-22 to 4.4-23). Thus, no further response is needed.

- C-13: The commenter states that payment of the environmental document filing fee is required for the Project approval to be operative, vested, and final. The Project Applicant will pay the environmental document filing fee upon filing of the Notice of Determination to the Riverside County Clerk-Recorder Office. No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.
- C-14: The commenter provides concluding remarks and informs that CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts. The City will continue to coordinate with the CDFW and acknowledges Katrina Rehrer as the CDFW contact person.
- C-15: The commenter provides a table with recommended language to be incorporated into a future environmental document for the Project. The Draft Mitigation and Monitoring Reporting Plan provided by the CDFW has been reviewed and revised as requested. Refer to Section 3.0, *Draft EIR Clarifications and Revisions*, of the Final EIR for the revised mitigation measures for biological resources impacts.

COMMENT LETTER D



May 8, 2023

Nathan Perez, Senior Planner  
City of Perris  
Development Services Department  
135 North "D" Street  
Perris, CA 92570

**Subject:** EMWD Comments for the First March Logistics Project Notice of Preparation of a Draft Environmental Impact Report

**Location:** East of Interstate 215 (I-215), south of the County of Riverside and March Air Reserve Base/Inland Port Airport (MARB/IPA), west of Natwar Lane and North of Nandina Avenue in the City of Perris, Riverside County, California.

Dear Mr. Nathan Perez:

Eastern Municipal Water District (EMWD) thanks you for the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report for the First March Logistics Project (project). The proposed project consists of the construction and operation of two industrial buildings totaling 554,375 square feet (sf) on approximately 27.56 acres. The buildings would allow for either high-cube, non-refrigerated warehouse/distribution, or manufacturing uses. Building 1 (Phase 1) would be 419,034 sf including 411,034 sf of warehouse and 8,000 sf of office space. Building 2 (Phase 2) would be 125,340 sf including 118,341 sf of warehouse and 7,000 sf of office space. The project would be constructed in two phases: 1) Building 1 on 20.0 acres and detention basin on 6.4 acres (between Natwar Lane and Western Way) and 2) Building 2 would replace the detention basin by 2025.

←  
D-1  
→

EMWD offers the following comments:

To define the impact(s) on the environment and on existing EMWD facilities, and as development within this area occurs over time, the proponents of implementing development projects shall consult EMWD's Development Services Department to compare proposed and existing water demands and sewer flows,

←  
D-2  
→

Board of Directors  
Philip E. Paule, *President* Stephen J. Corona, *Vice President* Jeff Armstrong Randy A. Record David J. Slawson

2270 Trumble Road • P.O. Box 8300 • Perris, CA 92572-8300  
T 951.928.3777 • F 951.928.6177 www.emwd.org

**COMMENT LETTER D**

EMWD Comments  
May 8, 2023  
Page 2

and prepare a Design Conditions report (DC), formally known as the Plan of Service (POS), to detail all pertinent facilities necessary to serve such implementing development projects, resulting in an approved DC, prior to final design and plan check of such facilities.

D-2  
(CONT.)

To help define EMWD's Design Conditions, EMWD requires beginning dialogue with project proponents at an early stage in the site design and development, via a one-hour complementary Due Diligence meeting. To set up this meeting the project proponent should complete a Project Questionnaire (form NBD-058) and submit to EMWD. To download this form or for additional information, please visit our web page [www.emwd.org](http://www.emwd.org), then select the "Developer" link, then select the "New Development Process Forms" link. This meeting will offer the following benefits:

D-3

1. Describe EMWD's development process.
2. Identify project scope and parameters.
3. Provide a preliminary review of the project within the context of existing infrastructure.
4. Discuss potential candidacy for recycled water service.
5. Identify project submittal requirements to start the Design Conditions review.

Following the Due Diligence meeting, and to proceed with a project, the Design Conditions will need to be developed by the developer's engineer and reviewed/approved by EMWD prior to submitting improvement plans for Plan Check. The DC process and approval will provide the following:

D-4

1. Technical evaluation of the project's demands and existing system capacities.
2. Identification of impacts to existing facilities.
3. Identification of additional on-site and off-site facilities, necessary to serve the project.
4. Identification of easement requirements, if necessary.
5. Identification of potential EMWD's cost participation in facility oversizing, if applicable.

If you have questions or concerns, please do not hesitate to contact Maroun El-Hage at (951) 928-3777, extension 4468 or by e-mail at [El-hagem@emwd.org](mailto:El-hagem@emwd.org).

Sincerely,

**Al Javier**

Digitally signed by Al Javier  
Date: 2023.05.08 15:59:58  
-07'00'

Alfred Javier  
Director of Environmental and Regulatory Compliance  
ARJ: hs

## **Responses to Comment Letter D**

### **Eastern Municipal Water District (EMWD)**

- D-1: The commenter provides introductory remarks and a summary of the Project description. Detailed comments are provided in the body of the commenter letter, which are responded to in the following responses below.
- D-2: The commenter requests that the EMWD's Development Services Department be consulted to compare proposed and existing water demands and sewer flows, and that a Design Conditions report be prepared. The Project Applicant will prepare a Design Conditions report to detail all pertinent facilities necessary to serve the Project, prior to final design and plan check of such facilities. No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.
- D-3: The commenter provides information on the consultation process, including a one-hour complimentary Due Diligence meeting, and encourages early coordination. The Project Applicant will coordinate with the EMWD during the consultation process. No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.
- D-4: The commenter provides information regarding the Design Conditions that need to be developed for review and approval by the EMWD prior to submitting improvement plans for Plan Check. The Project Applicant and Project Engineer acknowledges this requirement and will prepare the Design Conditions report and submit it for review/approval to the EMWD prior to submittal of plans for Plan Check. The Project Applicant and City acknowledges Maroun El-Hage as the EMWD contact person. No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.

COMMENT LETTER E

MARCH JOINT POWERS AUTHORITY

June 12, 2023

**Nathan Perez**  
Senior Planner  
City of Perris  
Development Services Department | Planning Department  
135 North D Street  
Perris, CA 92570

**RE: March Joint Powers Authority Comments**  
Draft Environmental Impact Report – First March Logistics Project

Dear Mr. Perez:

Thank you for the opportunity to comment on the **City of Perris Draft Environmental Impact Report (DEIR) for the First March Logistics Project**. The March Joint Powers Authority (MJPA) understands that the Project is located in the City of Perris, specifically the northwest portion of the Perris Valley Commerce Center Specific Plan (PVCCSP) area, consisting of two industrial buildings totaling 554,375 square feet on the approximately 27.56 acres, to be constructed in two phases. It should be noted that the Project is contiguous with our planning boundary and the Veterans Industrial Park 215 Specific Plan area and industrial warehouse development, nearing completion by Hillwood Development.

Having reviewed the DEIR, the MJPA offers the following comments for your consideration:

**Chapter 3.0 - Project Description**

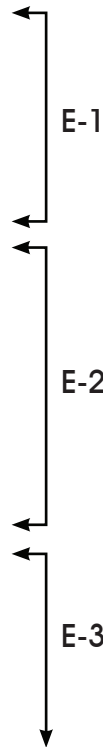
Section 3.6.3: Landscape, Screen Walls, Hardscape and Lighting  
Screen Walls, Page 3-21:

The description for fencing includes a wrought iron fence, 8 feet in height. This is not consistent with the Screen Wall and Fence Plan, Parts 1 and 2, Figures 3-12, 3-13. The Plans show a metal perforated fence, 10 feet in height with 11-foot pilasters. Please check Section 4.2.6, Walls and Fences, of the PVCCSP for height and material consistency. In addition, for screening and privacy purposes, wrought iron fencing should also be provided along the northern boundary of the Building 2 site.

**Chapter 4.1 Aesthetics**

Section 4.1.4: Environmental Impacts  
Impact Analysis, Page 4.1-14

Threshold C includes a discussion on public visual change/views resulting from the Project on Natwar Lane and Western Way. A discussion should also be included regarding Van Buren Boulevard, which fronts the northern boundary of the Project. How would the proposed Project visually change/enhance this portion of Van Buren Boulevard?



**COMMENT LETTER E**

First March Logistics Project  
Draft EIR Comments – June 12, 2023  
Page 2 of 2

If you have any questions regarding our comments or need additional information, please feel free to contact me at (951) 656-7000, or by email at, [smith@marchjpa.com](mailto:smith@marchjpa.com). Thank you.

Sincerely,



**Jeffrey M. Smith, AICP**  
Principal Planner  
March Joint Powers Authority

E-3  
(CONT.)

## **Responses to Comment Letter E**

### **March Joint Powers Authority (MJPA)**

E-1: The commenter provides a description of the Project and notes that the Project is contiguous to the MJPA planning boundary and the Veterans Industrial Park 215 Specific Plan area and industrial warehouse development, nearing completion by Hillwood Development. Detailed comments are provided in the body of the commenter letter, which are responded to in the following responses below.

E-2: The commenter provides comments on Section 3.0, *Project Description*, Subsection 3.6.3, of the Draft EIR, regarding landscaping, screen walls, hardscape and lighting and indicates that the fencing plan and description should be checked for consistency with the Perris Valley Commerce Center Specific Plan (PVCCSP) and that fencing should also be provided along the northern boundary of the Building 2 site. As shown in Figures 3-12 and 3-13 of the Draft EIR, fencing would be provided along the perimeters of the Project site with the exception of the western boundary of the Building 1 site and northern and southern boundaries of Building 2 site. Page 3-21 of the Draft EIR has been revised as follows:

A combination of screen walls and fencing would be provided on the Project site for screening, privacy, noise control, and security. Figure 3-12, *Screen Wall and Fence Plan – Part 1*, and Figure 3-13, *Screen Wall and Fence Plan – Part 2*, depicts the location of the proposed walls and fences and the typical elevations. As shown, 14-foot-high concrete tilt-up screen walls would be provided along part of the northern boundary of the Building 1 site, the perimeter of the truck trailer parking areas on the eastern and western sides of the Building 1 site, and the perimeter of the truck trailer parking areas on the southern side of the Building 2 site. Wrought iron fencing (~~8~~**10** feet high) would be provided along the perimeters of the Project site, with the exception of the western boundary of the Building 1 site and northern and southern boundaries of the Building 2 site.

E-3: The commenter provides comments on Section 4.1.4, *Aesthetics*, of the Draft EIR, requesting the addition of a discussion regarding how the Project would visually change/enhance the portion of Van Buren Boulevard that fronts the northern boundary of the Project. As discussed in Section 4.1, *Aesthetics*, the following analysis in Threshold c addresses public views, which mostly consist of travelers along I-215, Natwar Lane, and Western Way (Draft EIR pp. 4.1-14 to 4.1-17).

As discussed in Section 3.0, *Project Description*, of the Draft EIR, a future east-west roadway (Van Buren Boulevard) connecting to March Air Reserve Base/Inland Port Airport (MARB/IPA) will be constructed adjacent to the northern boundary of the Project site; the roadway would not be developed as part of the Project. No access to/from the Project site would occur off the MARB/IPA roadway. As discussed under Threshold b in Section 4.1, *Aesthetics*, the PVCCSP identifies the future Van Buren Boulevard as a “visual zone, which the PVCCSP emphasizes that “visual zones” should include aesthetic enhancements with high caliber industrial development. The Project would be required to comply with the Design Standards and Guidelines outlined in the PVCCSP, including restrictions on building height and landscaping. The conceptual landscape plan for the Project is shown on Figure 3-11, *Conceptual Landscape Plan*, of the Draft EIR. As shown in Figure 3-11, landscaping would be planted along the entire northern boundary of the Project site. 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. (Draft EIR pp. 4.1-14 to 4.1-17)

**COMMENT LETTER F**

**From:** [Vega, Jaqueline](#)  
**To:** [Nathan Perez](#)  
**Subject:** RE: DPR20-00004  
**Date:** Tuesday, April 9, 2024 11:19:54 AM  
**Attachments:** [image001.png](#)

---

Hello Nathan,

Thank you for transmitting the above referenced project to ALUC for review. Please note that the proposed project is located within Zone B2 of the March Air Reserve Airport Land Use Compatibility Plan. The City’s General Plan was found consistent with the March Air Reserve ALUCP, and under State Public Utilities Code, ALUC review is not mandated and City staff can perform the airport land use compatibility review themselves.

←  
F-1  
←

*Should you have any questions, please contact me.*

*Jackie Vega  
Urban Regional Planner II*



**Riverside County Airport Land Use Commission**  
4080 Lemon Street, 14<sup>th</sup> Floor  
Riverside, Ca 92501  
(951) 955-0982  
[javega@RIVCO.ORG](mailto:javega@RIVCO.ORG)  
[www.rcaluc.org](http://www.rcaluc.org)

## **Responses to Comment Letter F**

### **Riverside County Airport Land Use Commission (ALUC)**

F-1: The Riverside County ALUC states that the Project Site is located within Zone B2 of the March Air Reserve Airport Land Use Compatibility Plan, and that ALUC review is not mandated and City staff can perform the airport land use compatibility review themselves. City staff has performed the airport land use compatibility review for the Project and has determined that with incorporation of PVCCSP EIR mitigation measures MM Haz 2 through Haz 6, the Project would not result in a conflict with any of the policies or requirements outlined in the MARB/IPA ALUCP. As discussed under Threshold e of Section 4.9, *Hazardous and Hazardous Materials* of the Draft EIR, the Project would have a 151.1 people per single-acre intensity, which is below the 250 people per single-acre intensity allowed in Compatibility Zone B2. In addition, the FAA has conducted an aeronautical study of the Project and determined that the proposed structure would not exceed obstruction standards and would not be a hazard to air navigation. (Draft EIR pp. 4.9-18 to 4.9-20) The City acknowledges Jackie Vega as the Riverside County ALUC contact person. No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.

**COMMENT LETTER G**



**County of Riverside  
DEPARTMENT OF ENVIRONMENTAL HEALTH**

P.O. BOX 7909 • RIVERSIDE, CA 92513-7909  
JEFF JOHNSON, DIRECTOR

5/10/2023

City of Perris - Development Services Department, Planning Division  
Attn: Nathan Perez, Senior Planner  
135 North "D" Street  
Perris, CA 92570

**SUBJECT: DEPARTMENT OF ENVIRONMENTAL HEALTH REVIEW OF CITY OF PERRIS PLANNING CASES**

Dear Mr. Perez:

City of Perris, Development Services Department is responsible for implementing the requirements of CEQA<sup>[1]</sup> for planning projects within their jurisdiction. To ensure compliance with CEQA<sup>[2]</sup>, City of Perris Planners distribute projects to the appropriate agencies/departments for review. Experienced staff with knowledge and background of state and local laws/regulations specific to their department, evaluate the proposed projects for compliance and provide applicable comments.

G-1

Proper review of proposed projects by appropriate staff ensures compliance with state and local laws and regulations as well as provides protection for the citizens of Riverside County and the environment from the potential adverse effects of a project.

For Riverside County Department of Environmental Health (DEH) to conduct a project review, the following items will need to be addressed:

G-2

**REVIEW FEES**

Please refer to the attached "Environmental Health Review Fees" tier chart for the appropriate fees. A minimum initial deposit will be required to conduct reviews. Additional fees may be required depending on time spent on the project. These fees will need to be collected prior to DEH issuing a final project comments letter.

<sup>[1]</sup> The California Environmental Quality Act (CEQA) CCR Title 14 15065 is a statute that requires state and local agencies to determine whether a project may have a significant effect on the environment.

<sup>[2]</sup> A project is an activity which must receive some discretionary approval (meaning that the agency has the authority to deny the requested permit or approval) from a government agency which may cause either a direct physical change in the environment or a reasonably foreseeable indirect change in the environment.

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www.rivcoeh.org

**COMMENT LETTER G**

**WATER AND WASTEWATER**

DEH will request information to evaluate a project's water source and method of sewage disposal. Information should be included in exhibits so that DEH can provide further comments as to what will be required for the project.

G-3

**ENVIRONMENTAL CLEANUP PROGRAM (ECP)**

ECP conducts environmental reviews on planning projects to ensure that existing site conditions will not negatively affect human health or the environment. The intent of the environmental review is to determine if there are potential sources of environmental and/or human exposures associated with the project, identify the significance of potential adverse effects from the contaminants, and evaluate the adequacy of mitigation measures for minimizing exposures and potential adverse effects from existing contamination and/or hazardous substance handling.

G-4

**HAZARDOUS MATERIALS MANAGEMENT BRANCH (HMMB)**

HMMB will review projects to determine if hazardous materials are being handled and will provide further comments as part of the review process as it relates to the project.

G-5

**DISTRICT ENVIRONMENTAL SERVICES (DES)**

DES will review and provide comments on projects that include the following:

- Food Facilities
- Pools/Spas/Water Features
- Facilities that sell tobacco

G-6

**LOCAL ENFORCEMENT AGENCY (LEA)**

LEA will review and provide comments on projects that include the following:

- Landfills, transfer stations, composting sites, and other specific solid waste activities
- Facilities that handle medical waste
- Body art facilities
- Compliance with SB1383

G-7

Should you have any questions regarding this letter, please contact me at (951) 955-8980.

Sincerely,

Jenay Marcotte, REHS  
County of Riverside, Department of Environmental Health  
Environmental Protection and Oversight Division  
4080 Lemon Street, 10<sup>th</sup> Floor  
Riverside, CA 92501

**COMMENT LETTER G**



**County of Riverside  
 DEPARTMENT OF ENVIRONMENTAL HEALTH**

P.O. BOX 7909 • RIVERSIDE, CA 92513-7909  
 JEFF JOHNSON, DIRECTOR

**Environmental Health Review Fees**  
 (Planning Case Transmittals for Contracted Cities)

DESCRIPTION	FEE
<p><b>Tier 1 - Water and Sewer verification review</b></p> <ul style="list-style-type: none"> <li>• Will Serve Letter</li> <li>• Onsite Wastewater Treatment Systems</li> <li>• Advance Treatment Units</li> <li>• Soils Percolation Report</li> <li>• Issuance of a SAN 53 and/or Comments Letter</li> <li>• Wells</li> </ul> <p>Average time 3 hours for review</p>	\$597.00
<p><b>Tier 2 - Phase I Environmental Site Assessment (ESA) review or additional report reviews,</b></p> <ul style="list-style-type: none"> <li>• Review of items aforementioned in Tier 1</li> </ul> <p>Average time 7 hours for review</p>	\$1393.00
<p><b>Tier 3 - Phase II Environmental Site Assessment (ESA) review and additional report reviews,</b></p> <ul style="list-style-type: none"> <li>• Review of items aforementioned in Tier 1 and Tier 2</li> </ul> <p>Average time 10 hours for review</p>	\$1990.00

G-8

**NOTES TO FEE SCHEDULE:**

- The fees noted in the fee schedule are minimum fees to be paid at the time of application filing to cover the average Department cost of review. Should actual costs exceed the amount of the fee, the applicant will be billed for additional costs. Services are charged at a rate of \$199/hour.
- An hourly rate of \$199 shall be charged for other development-related fees which may be required, but are not necessarily limited to, well, and septic system fees.
- An application shall be filed with the Planning Department of the Contracted city prior to submitting any items listed above to this Department for Review. Please provide a copy of the Planning Case transmittal to this Department.

Rev 07/01/22

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## **Responses to Comment Letter G**

### **Riverside County Department of Environmental Health (DEH)**

- G-1: The commenter informs that the City Development Services Department is responsible for implementing the requirements of CEQA for planning projects within their jurisdiction and informs of the staff review process. As required by Section 15087 of the State CEQA Guidelines, a NOC and a NOA of the Draft EIR for the Project was filed with the SCH on April 27, 2023, and the NOA of the Draft EIR was also filed with the Riverside County Clerk. The Draft EIR was circulated for public review for a minimum of 45 days, from April 28, 2023, to June 12, 2023. In accordance with State CEQA Guidelines Section 15088, the City, as the Lead Agency under CEQA, has evaluated the comments received on the Draft EIR (SCH No. 2021120497) for the proposed First March Logistics Project and has prepared this Final EIR with written responses to these comments. Thus, no further response is needed.
- G-2: The commenter informs of the Environmental Health Review Fees which would be required prior to DEH issuing a final Project comment letter. No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.
- G-3: In order to conduct a Project review, DEH will request information to evaluate a Project's water source and method of sewage disposal. Section 4.16, *Utilities and Service Systems*, of the Draft EIR discusses the Project's anticipated water demand and proposed water connection as well as the Project's wastewater generation and the capacity of existing treatment facility that would serve the Project site. As concluded, the Perris Valley Regional Water Reclamation Facility 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. Additionally, the EMWD has sufficient water supplies available to serve the Project from existing entitlements/resources and no new or expanded entitlements are needed. Accordingly, impacts would be less than significant and mitigation is not required. (Draft EIR pp. 4.16-10 to 4.16-14). No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.
- G-4: As part of the Project review, the Environmental Cleanup Program (ECP) conducts environmental reviews on planning projects to ensure that existing site conditions will not negatively affect human health or the environment. As discussed in Section 4.9, *Hazards and Hazardous Materials*, of the Draft EIR, the Project site contains no evidence of RECs, USTs, ASTs, PCBs, or significant chemical release/disposal on the Project site. No staining, hazardous materials, chemical/petroleum odors, pools of liquid, floor drains/sumps/wells, drums, stressed vegetation, wastewater discharges/disposal systems, or septic systems were found on the Project site or surrounding area. 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. 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. (Draft EIR pp. 4.9-15 to 4.9-17) No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.
- G-5: As part of the Project review, the Hazardous Materials Management Branch (HMMB) will review projects to determine if hazardous materials are being handled. As discussed in

Section 4.9, *Hazards and Hazardous Materials*, of the Draft EIR, 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 (Draft EIR p. 4.9-17). No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.

- G-6: As part of the Project review, the District Environmental Services (DES) would review and provide comments on food facilities, pools, spas, and water features, and facilities that sell tobacco. The Project involves the construction and operation of two industrial buildings and does not propose food facilities, pools, spas, water features, and facilities that sell tobacco. The Project Applicant acknowledges DES review and comments on projects that include food facilities, pools/spas/water features, or facilities that sell tobacco. No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.
- G-7: As part of the Project review, the local enforcement agency (LEA) would review and provide comments on landfills, transfer stations, composting sites, and other specific solid waste activities; facilities that handle medical waste; body art facilities; and compliance with SB1383. The Project involves the construction and operation of two industrial buildings that would allow for either high-cube, non-refrigerated warehouse/distribution, or manufacturing uses. The Project Applicant acknowledges LEA review and comments on projects that include landfills, transfer stations, composting sites, and other specific solid waste activities, facilities that handle medical waste, body art facilities, and compliance with SB 1383. The City acknowledges Jenay Marcotte as Riverside County DEH contact person. No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.
- G-8: The commenter provides a table listing Environmental Health Review Fees; no further response is needed.

**COMMENT LETTER H**



April 12, 2023

**SENT VIA EMAIL**

Mr. Stuart McKibbin  
City Engineer  
[stuart@trilakeconsultants.com](mailto:stuart@trilakeconsultants.com)

Dear Mr. McKibbin:

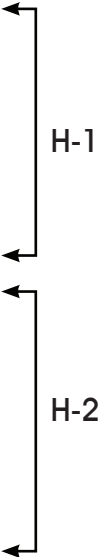
Re: PM 37965 (DPR 20-00004)  
First March Logistics Project  
Plan Check No. 2  
Account No. 137-0-3-90329

The following items submitted by Thienes Engineering, Inc. were received by Riverside County Flood Control and Water Conservation District (District) on March 22, 2023:

- (1) First March Logistics Natwar Lane Storm Drain Plans
- (1) Hydrology and Hydraulics Report dated March 1, 2023
- (1) Copy of the 1<sup>st</sup> Plan Check Comments and Responses

As requested by the District, Lockwood, Andrews, & Newnam, Inc. (LAN) has completed review of the submittal and commented directly on the plans and reports for the engineer to revise and/or address. These comments are repeated in this letter for clarity.

PM 37965 is a proposal for the construction of two warehouses, Building 1 and 2, approximately 420,000 square feet and 125,000 square feet, respectively. The project site includes two buildings separated into two construction phases and is bounded by the March Air Reserve Base to the northeast, Western Way to the east, Nandina Avenue to the South and Interstate 215 to the west. The project site is tributary to Perris Valley Master Drainage Plan facility 'Lateral B-7' along Nandina Avenue. Rather than following existing drainage patterns to the south at Nandina Avenue, PM 37965 proposes to route flows along the north side of the project within a future public street. The proposed facility, Lateral B-7 then connects downstream to Perris Valley Channel Lateral B, Stage 4. 360 CFS is contributed to Lateral B-7 at the most upstream end, in addition to the onsite project flows and offsite flow from the freeway.



**COMMENT LETTER H**

Mr. McKibbin  
 PM 37965 – Plan Check No. 2  
 Account No. 137-0-3-90329  
 April 12, 2023  
 Page 2 of 4

**General**

- The proposed facility will be tributary to the District’s Lateral B, Stage 4 project which is under design. The developer is responsible for contributing the cost of the enlarged section of the Lateral B. Please be aware that the Lateral B, Stage 4 plans will tentatively be completed in May 2023 and expected to be advertised for construction later this year. It is imperative that developer contact the District to provide their contribution, otherwise the District will need to proceed with the original design. H-3
- Previously, the engineer has submitted Master Site Plans, Phase 1 and Phase 2, Conceptual Grading Plan for Phase 1, and Phase 2. With this submittal, these plans were not submitted. We previously had some questions about the temporary facilities as it relates to operation and maintenance responsibilities. Since we do not have the answers to our questions and do not have the copies of the subject plans, our comments are still outstanding. H-4
- With the submittal, there are conceptual grading plans showing an 84-inch RCP approximately same alignment as the proposed Lateral B-7. Please make sure all the documents are reflecting the same proposed alignments. *(Outstanding comment)* H-5
- The proposed scheme also includes an interim condition where a temporary detention basin and temporary outlet are proposed for on Building 2 site. We need to make sure that proposed interim basin does not exceed DSOD dam requirements for height and storage. Please note, should the developer provide their cost contribution referenced above, an interim basin and outlet may not be necessary. *(Outstanding comment)* H-6
- The report and exhibits should clearly identify the interim conditions and ultimate conditions. *(Outstanding comment)* H-7
- An encroachment permit from Caltrans will be required; provide it when available. *(Repeat Comment)* H-8
- Please submit preliminary WQMP report when available. *(Repeat Comment)* H-9

**Hydrology and Hydraulics Report**

- Provide description and phasing of the project. *(Outstanding Comment)* H-10
- Make certain correct starting water surface elevation is used from Lateral B, Stage 4 plans. *(Repeat Comment)*

**Improvement Plans**

- Address redlines on the plans. H-11
- Follow District’s Drafting Manual. H-12
- The proposed connection to the Lateral B, Stage 4 needs to be detailed. H-13
- Provide communication/clearance from MWD as the proposed facility crosses the 97-inch water line. H-14
- Show the easement widths on plans and typical sections. Make certain that the proposed easement width is satisfactory. H-15
- An overall parcel map showing all easements should be include with the next submittal. H-16
- Provide an exhibit and/or discussion how the District will have access to the proposed facility. H-17
- District specifies minimum height of 4 feet of RCB facilities considering maintenance related concerns. The applicant has 3.5 feet high RCB proposed at the upstream. Please revisit to see if 4 feet high minimum can be implemented. H-18

**COMMENT LETTER H**

Mr. McKibbin  
PM 37965 – Plan Check No. 2  
Account No. 137-0-3-90329  
April 12, 2023  
Page 3 of 4

**Environmental Clearance**

- Provide final copy of all applicable CEQA documents (i.e., Initial Study, EIR, habitat assessments, survey reports, etc.). ← H-19
- Provide a copy of all applicable environmental regulatory permits (i.e., 404, 401, 1602, BO/take permits) for the construction and maintenance of the project. Provide a copy of the application packages submitted to the California Department of Fish and Wildlife and the Army Corps of Engineers to verify the project submitted with the applications matches the project shown on the final design plans. Any regulatory permits must not preclude the District's ability to maintain the facility and indicate that the permit includes all future maintenance of the facility to ensure the conveyance capacity of the facility. Any mitigation, conservation areas/easements, or regulatory permit restrictions within areas subject to District maintenance activities are prohibited unless approved in writing by the District's Chief of Operations and Maintenance. ← H-20
- If regulatory permits (i.e., 404, 401, and 1602) are deemed unnecessary for the construction and maintenance of the project by the Applicant, then a written confirmation from the applicable regulatory agencies shall be provided to the District for review. ← H-21

**Construction Inspection / Facility Acceptance**

Inspection and maintenance of the storm drainage system to be constructed with this project must be performed by the District. It must be designed to District standards. Three items must be accomplished prior to recordation of the final map or starting construction of the drainage facility: 1) the engineer (owner) shall submit to the District the preliminary title reports, plat and legal descriptions for all right of way to be conveyed to the District and secure that right of way to the satisfaction of the District; 2) an agreement with the District must be executed which establishes the terms and conditions of inspection, operation and maintenance; and 3) plans for the facility must be signed by the District's General ← H-22

Manager-Chief Engineer. The plans cannot be signed prior to execution of the agreement. An application for Cooperative Agreement must be submitted, via the plan checker, to Ann Marie Rolle of the District's Contract Services Section. The agreement application shall note the project number, location, briefly describe the system (sizes and lengths) and include half sized reduced plans and an exhibit that shows the proposed alignment. Note that design changes after submitting the agreement application, or submitting an incomplete application, (i.e., lacking a finalized project description, authorized signatories, legal plats, and descriptions, etc.) may cause delays in preparing the agreement. Please also note that the completed application will not be placed into the queue for Contract Services until the District plan checker has determined that the plans have reached 60% and no significant changes to the plans are anticipated. All right of way transfer issues must be coordinated with Ami Urista of the District's Plan Check Section. ← H-23

Prior to scheduling a pre-construction meeting and issuance of the notice to proceed with construction of drainage facilities that the District would assume ultimate maintenance responsibility, the following seven items must be provided to Ann Marie Rolle of the District's Contract Services Section: ← H-24

- a. Construction inspection fees
- b. Confirmation of bond acceptance by the bond holder
- c. Approved liability insurance certificate listing District as additional insured
- d. Workers' compensation insurance certificate

COMMENT LETTER H

Mr. McKibbin  
PM 37965 – Plan Check No. 2  
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April 12, 2023  
Page 4 of 4

- e. Contractor designation and construction schedule
- f. Proper 20-day notice-of-intent to start construction.
- g. Confined space procedure.

H-24  
(CONT.)

Checked copies of the submitted plans have been returned to the engineer for corrections. The resubmittal should be date stamped by the engineer, any plans folded to 9"x12" with the title block showing, and returned to the District office. Should you need to contact me, please call 714.620.6520 or Ruddy Argueta at 951.955.1239 regarding questions on the above requirements.

Review of plans and/or calculations by the consultant plan checker and/or the District does not relieve the Engineer of Record (EOR) of responsibility for the engineering design, adherence to codes or requirements, or issues that may arise resulting from errors or omissions of any kind.

Sincerely,



M. Cenk Yavas, P.E.  
Plan Check Engineer



H-25



Ruddy Argueta, P.E.  
Senior Civil Engineer

- ec:
- Reinhard Stenzel, Thienes Engineering, Inc.
  - Sarah Bova, Thienes Engineering, Inc.
  - Michael Goodwin, First industrial Realty Trust, Inc.
  - John Pourkazemi, City of Perris ([john@trilakeconsultants.com](mailto:john@trilakeconsultants.com))
  - Darren James, RCFC&WCD
  - Entcho Anguelov, RCFC&WCD

## **Responses to Comment Letter H**

### **Lockwood, Andrews & Newman, Inc. (LAN) on behalf of the Riverside County Flood Control and Water Conservation District (District)**

- H-1: The commenter indicates that they completed a review, on behalf of the Riverside County Flood Control and Water Conservation District, of the First March Logistics Natwar Lane Storm Drain Plans, the Hydrology and Hydraulics Report dated March 1, 2023, and the First Plan Check Comments and Responses that were submitted by Thienes Engineering, Inc. on March 22, 2023. Detailed comments are provided in the body of the commenter letter, which are responded to in the following responses below.
- H-2: The commenter provides a description of the Project and indicates that the Project site is tributary to Perris Valley Master Drainage Plan facility 'Lateral B-7' along Nandina Avenue. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.
- H-3: The commenter indicates that the developer is responsible for contributing the cost of the enlarged section of the Lateral B, and because the Stage 4 plans will be completed in May 2023 and advertised for construction later this year, the developer should contact the District regarding their contribution. The Project Applicant will coordinate with the District on contributing to the cost of the enlarged section of Lateral B. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.
- H-4: The commenter states that their comments regarding temporary facilities relating to operation and maintenance on previously submitted plans are still outstanding.
- If an interim condition were to be constructed, then maintenance would be the responsibility of the Project Applicant. However, it should be noted that the RCFCD believes that Lateral B, Stage 4 will be constructed before the Project is constructed. In this instance, the temporary detention basin and subsequent onsite detention will no longer be required, and all submitted plans will be the ultimate condition. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.
- H-5: The commenter informs that there are conceptual grading plans showing an 84-inch RCP on approximately the same alignment as the proposed Lateral B-7, and requests that all submitted documents reflect the same proposed alignment. The Final RCFCD plans show the proper proposed RCB; the 84-inch RCP is no longer valid. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.
- H-6: The commenter informs that the temporary detention basin and outlet proposed on the Building 2 site cannot exceed the DSOD dam requirements for height and storage, and that the basin and outlet may not be necessary should the developer pay their cost contribution. As discussed above, RCFCD believes that the Lateral B drain will be constructed before the Project, and therefore is able to accept Master Plan flows from the developed areas. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.

H-7: The commenter states that the report and exhibits should clearly identify the interim conditions and ultimate conditions. Figures 3-4 to 3-6 of the Draft EIR show the interim and ultimate condition. Refer also to Response to Comment H-4. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.

H-8: The commenter comments that an encroachment permit from Caltrans will be required and it should be provided when available. As discussed in Section 4.14, *Transportation*, roadway improvements in and around the Project site would be designed and constructed to satisfy all City and Caltrans requirements for street widths, corner radii, and intersection control. They would also incorporate design standards tailored specifically to Project access requirements.

Consistent with Caltrans requirements, the 95th percentile queuing of vehicles has been assessed at the off-ramps to determine potential queuing deficiencies at the freeway ramp intersections at the I-215 Freeway at Harley Knox Boulevard Interchange. Under existing conditions, there are no off-ramp movements that are currently experiencing queuing issues during the weekday AM or weekday PM peak 95th percentile traffic flows; although, field observations of the I-215 Freeway interchange at Harley Knox Boulevard indicated that there are queues during the peak hours. However, there are no additional movements that are anticipated to experience queuing issues during the weekday AM or weekday PM peak 95th percentile traffic flows under all project future traffic conditions. The interchange is included in both the TUMF and NPRBBD fee programs and the Project will participate in contributing towards the I215/Harley Knox Boulevard interchange improvements through payment of the TUMF and NPRBBD fees. Therefore, the Project would not result in queuing deficiencies that would substantially increase hazards. A Caltrans encroachment permit will not be required and no further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.

H-9: The commenter requests that the preliminary WQMP report be submitted when available. The preliminary WQMPs are attached as Appendix I3 and I4 of the Draft EIR. No further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.

H-10: The commenter requests that the Hydrology and Hydraulics Report provide a description and phasing of the Project and make certain the correct surface water elevation is used from Lateral B, Stage 4 plans. Refer to Response to Comment H-4. The starting water surface elevation on the proposed reinforced concrete box is taken from WEBB's Lateral B plans, where a stub was provided for the proposed reinforced concrete box. Additionally, there is ongoing coordination with WEBB to ensure the most accurate information is being used. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.

H-11: The commenter requests the redlines on the Improvement Plans be addressed. Plans are currently in plan check and being revised as comments are received. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.

H-12: The commenter requests that the Improvement Plans follow the District's Drafting Manual. RCFCD plans are currently in plan check and are being revised per RCFCD drafting standards. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.

- H-13: The commenter requests that the proposed connection to Lateral B, Stage 4 be detailed on the Improvement Plans. Connection detail will be included on the plan set once received. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.
- H-14: The commenter requests that the Improvement Plans provide communication/clearance from the MWD as the proposed facility crosses the 97-inch water line. The crossing has been submitted to the MWD and is currently under review. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.
- H-15: The commenter requests that the easement widths be shown on plans and typical sections and that the proposed easement width is satisfactory. The 30-foot easement provided meets District standards. All easement widths are clearly shown on storm drain plan sheets. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.
- H-16: The commenter requests that an overall parcel map showing all easements be included with the next submittal. This comment is acknowledged and a parcel map will be provided with the next submittal. Note that Tentative Parcel Map 37965 is shown on Figure 3-18 of the Draft EIR. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.
- H-17: The commenter requests an exhibit or discussion of how the District will have access to the proposed facility be provided. This comment is acknowledged and a site access exhibit will be provided with the next submittal. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.
- H-18: The commenter states that the District specifies a minimum height of 4 feet of RCB facilities, rather than the 3.5-foot-high RCB proposed at the upstream and would like to see if a 4-foot-high minimum can be implemented. Storm drain plans have been revised such that all proposed RCB is a minimum of 4 feet. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.
- H-19: The commenter requests that final copies of all applicable CEQA documents be provided. The City will provide a copy of the Final EIR and all applicable CEQA documents. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.
- H-20: The commenter requests copies of all applicable environmental regulatory permits for the construction and maintenance of the Project and the application packages submitted to the California Department of Fish and Wildlife and the Army Corps of Engineers which must include District access in order to maintain the facility. The City will provide LAN copies of all applicable environmental regulatory permits for the construction and maintenance of the Project and the application packages submitted to the California Department of Fish and Wildlife and the Army Corps of Engineers. Therefore, no further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.

- H-21: The commenter requests written confirmation from the applicable regulatory agencies be provided if regulatory permits are deemed unnecessary for the construction and maintenance of the Project. As discussed in Section 4.4, *Biological Resources*, of the Draft EIR, the Project Applicant would be required to comply with the previously identified mitigation measure (MM Bio 3) from the PVCCSP EIR, Project-specific delineations will be required to determine the limits of ACOE, RWQCB, and CDFG 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 the ACOE, a Section 401 Water Quality Certification from the RWQCB, and a Section 1602 Streambed Alteration Agreement from CDFG (Draft EIR p. 4.4-19). Refer also to Response to Comment C-7 and C-9 for the Project's Mitigation Measures for impacts to jurisdictional waters. Therefore, no further response is needed. No additions, revisions, or corrections to the Draft EIR are needed.
- H-22: The commenter informs that the storm drain system inspection and maintenance for the Project must be performed by the District, that the system must be designed to District standards, and informs of the items that must be accomplished prior to recordation of the final map or starting construction on the drainage facility. This comment is acknowledged and all requested items and agreements will be executed prior to recordation of the final map or start of construction. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.
- H-23: The commenter informs that the plans cannot be signed prior to execution of the agreement, that an application for Cooperative Agreement must be submitted, and that the completed application will not be placed in the queue for Contract Services until the District plan checker has determined that the plans have reached 60% and no significant changes to the plans are anticipated. This comment is acknowledged and all applications will be submitted for agreement. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.
- H-24: The commenter provides a list of items to be provided prior to the pre-construction meeting and issuance of the notice to proceed. It is acknowledged that prior to the pre-construction meeting and issuance of the notice to proceed with construction of drainage facilities that the District would assume ultimate maintenance responsibility, the Project Applicant will provide to the District's Contract Services Section the following items: a) construction inspection fees; b) confirmation of bond acceptance by the bond holder; c) approved liability insurance certificate listing District as additional insured; d) Workers' compensation insurance certificate; e) contractor designation and construction schedule; f) proper 20-day notice-of-intent to start construction; and g) confined space procedure. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR and thus no further response is required.
- H-25: The commenter informs that checked copies of the submitted plans have been returned to the engineer for corrections and provides instructions for resubmittal. This comment is acknowledged and no further response is needed.

COMMENT LETTER I

JASON E. UHLEY  
General Manager-Chief Engineer



1995 MARKET STREET  
RIVERSIDE, CA 92501  
951.955.1200  
951.788.9965 FAX  
www.rcflood.org

RIVERSIDE COUNTY FLOOD CONTROL  
AND WATER CONSERVATION DISTRICT

250942

May 4, 2023

City of Perris  
Planning Department  
135 North D Street  
Perris, CA 92570

Attention: Mr. Nathan Perez

Re: DPR 20-00004, TPM 37965, PLN 20-05117,  
First March Logistics Project, APNs 294-180-  
013, 294-180-028, 294-180-029, 294-180-030,  
294-180-032, 295-300-005 and 295-300-017

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

The District's review is based on the above-referenced project transmittal, received May 1, 2023. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

- This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.
- This project involves District proposed Master Drainage Plan facilities, namely, Perris Valley Master Drainage Plan Lateral B-7. The District will accept ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. All regulatory permits (and all documents pertaining thereto, e.g., Habitat Mitigation and Monitoring Plans, Conservation Plans/Easements) that are to be secured by the Applicant for both facility construction and maintenance shall be submitted to the District for review. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.
- This project proposes channels, storm drains 36 inches or larger in diameter, or other facilities that could be considered regional in nature and/or a logical extension a District's facility and the District would consider accepting ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of



**COMMENT LETTER I**

City of Perris

- 2 -

May 4, 2023

Re: DPR 20-00004, TPM 37965, PLN 20-05117,  
First March Logistics Project, APNs 294-180-  
013, 294-180-028, 294-180-029, 294-180-030,  
294-180-032, 295-300-005, and 295-300-017

250942

- the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.
- This project is located within the limits of the District's Perris Valley San Jacinto River Homeland/Romoland Line A Homeland/Romoland Line B Area Drainage Plan for which drainage fees have been adopted. If the project is proposing to create additional impervious surface area, applicable fees should be paid (in accordance with the Rules and Regulations for Administration of Area Drainage Plans) to the Flood Control District or City prior to issuance of grading or building permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.
- An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, Perris Valley Master Drainage Plan Line B, Stage 4. If a proposed storm drain connection exceeds the hydraulic performance of the existing drainage facilities, mitigation will be required. For further information, contact the District's Encroachment Permit Section at 951.955.1266.
- For additional details, please refer to the District's plan check comment letter dated April 17, 2023.

**GENERAL INFORMATION**

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

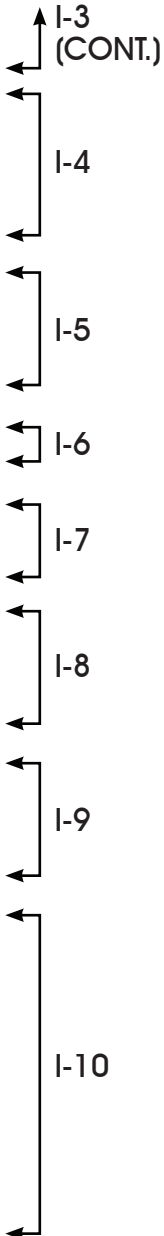
The project proponent shall bear the responsibility for complying with all applicable mitigation measures defined in the California Environmental Quality Act (CEQA) document (i.e., Negative Declaration, Mitigated Negative Declaration, Environmental Impact Report) and/or Mitigation Monitoring and Reporting Program, if a CEQA document was prepared for the project. The project proponent shall also bear the responsibility for complying with all other federal, state, and local environmental rules and regulations that may apply.

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,  
*Amy McNeill*  
AMY MCNEILL  
Engineering Project Manager

Attachments

ec: Riverside County Planning Department  
Attn: Timothy Wheeler  
EM:mm



## **Responses to Comment Letter I**

### **Riverside County Flood Control District and Water Conservation District (RCFCWD)**

- I-1: The commenter provides introductory comments on the RCFCWCD, its role in development projects, and the RCFCWCD's review of the Project. As stated, comments do not imply District approval or endorsement of the Project with respect to flood hazard, public health and safety, or any other such issue. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR; thus, no further response is required.
- I-2: The commenter informs that the RCFCWCD will accept ownership of the proposed Perris Valley Master Drainage Plan Lateral B-7 on written request by the City and shall enter into a cooperative agreement with the Project Applicant provided that the facility is constructed to RCFCWCD standards; upon the RCFCWCD's plan check and inspection; upon payment of plan check, inspection, and administrative fees; once all regulatory permits secured by the Applicant are submitted to the RCFCWCD for review and approved; and when no unreasonable constraints are placed upon the RCFCWCD's ability to operate and maintain the flood control facilities. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR; thus, no further response is required.
- I-3: The commenter states that the Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR; thus, no further response is required.
- I-4: The commenter provides that the Project is located in Perris Valley and if the Project is proposing to create additional impervious surface area, applicable fees should be paid to the District or City prior to issuance of grading or building permits. As discussed in Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, development of the Project would alter existing ground contours and would increase the impervious surface area on the Project site (Draft EIR p. 4.10-20). The Project Applicant would pay applicable fees to the District or the City prior to issuance of grading or building permits. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR; thus, no further response is required.
- I-5: The commenter provides that an encroachment permit shall be obtained for any construction related activities occurring within District right-of-way or facilities including the Perris Valley Master Drainage Plan Line B, Stage 4 and should a proposed storm drain connection exceed the hydraulic performance of the existing drainage facilities, mitigation will be required.

As discussed in Section 3.0, *Project Description*, of the Draft EIR, during Phase 1, all Project off-site runoff from Building 1 would be discharged to a public storm drain system that would drain into the temporary detention basin, which would be constructed on the Building 2 site. Once the future proposed storm drain is constructed, the detention basin would not be required and runoff from Buildings 1 and 2 would discharge to the northeast portion of the Project site. Flows will continue south on Western Way to Nandina. The public storm drain system ultimately connects east to the future storm drain along the

MARB/IPA western boundary. (Draft EIR p. 4.10-23) If Lateral B, Stage 4 is constructed before the Project is constructed, the temporary detention basin and subsequent onsite detention will no longer be required. Should any construction-related activities occur within District right of way or facilities, the Project Applicant would obtain an encroachment permit prior to encroachment.

As discussed in Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, the total 100-year peak flow rate for the Building 1 and Building 2 site is approximately 55.0 cfs and 19.7 cfs, respectively. Although runoff from the Project site would increase relative to existing conditions (i.e., from 24.0 cfs to 55.0 cfs and from 8.4 cfs to 19.7 cfs), the future public storm drain on Van Buren Boulevard would have adequate capacity to accommodate the increased rate of runoff from the Project site. In addition, the Project would be designed so that runoff from the Project site is directed to on-site treatment-control BMPs; therefore, flow volumes exiting the site would be less than or equal to pre-development conditions. The Project would not contribute stormwater runoff to an existing stormwater drainage system that would exceed the system's available capacity. Impacts would be less than significant. (Draft EIR p. 4.10-24) This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR; thus, no further response is required.

- I-6: The commenter states that for additional details, refer to the District's plan check comment letter dated April 17, 2023, that is included as Comment Letter H in this Final EIR. Refer to Response to Comment Letter H. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR; thus, no further response is required.
- I-7: The commenter informs that the Project may require a National Pollutant Discharge Elimination System (NPDES) Permit from the State Water Resources Control Board and that clearance for grading, recordation, or other final approval will not be given until the City has determined that the Project has been granted a permit or has been shown to be exempt. As discussed in Section 4.10, *Hydrology and Water Quality*, of the Draft EIR, the Project Applicant would be required to obtain a NPDES permit for construction activities, including grading (Draft EIR p. 4.10-14). This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR; thus, no further response is required.
- I-8: The commenter informs that if the Project involves a FEMA mapped floodplain, the Applicant will be required to provide all studies, calculations, plans, and other information to meet FEMA requirements, and should obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation or other final approval, and a Letter of Map Revision (LOMR) prior to occupancy. As discussed in 4.10, *Hydrology and Water Quality*, of the Draft EIR, the Project site is not located within a 100-year flood hazard area. The Project site's northwest corner and a portion of the western boundary are identified as being within Zone D, which are areas with possible but undetermined flood hazards, and the remaining portions of the site are identified as being within Zone X, an area of minimal flood hazard. Accordingly, the Project would have no potential to impede or redirect flood flows within a 100-year floodplain. No impact would occur. (Draft EIR p. 4.10-24) This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR; thus, no further response is required.
- I-9: The commenter informs that the Project proponent shall bear the responsibility for complying with all applicable mitigation measures defined in the CEQA document and or

Mitigation, Monitoring and Reporting Program, and the responsibility for complying with all other applicable federal, state, and local environmental rules and regulations. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR; thus, no further response is required.

- I-10: The commenter informs that if a natural watercourse or mapped floodplain is impacted by the Project, the Applicant will be required to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating that the Project is exempt from these requirements. As discussed in Section 4.4, *Biological Resources*, the Project site is heavily disturbed, and Drainage A is considered a low-quality channel. The Project Applicant would be required to comply with the previously identified mitigation measure (MM Bio 3) from the PVCCSP EIR, which requires the Project Applicant to obtain Corps and RWQCB (i.e., Section 404 and Section 401 of the Clean Water Act and Section 1600-1616 of the California Fish and Game Code) prior to grading activities on the Project site. (Draft EIR pp. 4.4-23 to 4.4-24) This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR; thus, no further response is required.

**COMMENT LETTER J**

**From:** [Mauricio Alvarez](#)  
**To:** [Nathan Perez](#)  
**Subject:** First March Logistics Project DPR20-00004 TPM 37965 PLN20-05117  
**Date:** Tuesday, May 9, 2023 8:28:42 AM

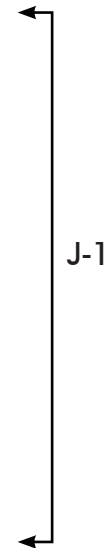
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Good Morning Nathan,

Thank you for including Riverside Transit Agency in the development review of the First March Logistics Project. After reviewing the plans, there are no recommendations to submit for this particular project at this time.

Thank you,

**Mauricio Alvarez, MBA**  
Planning Analyst  
Riverside Transit Agency  
p: 951.565.5260 | e: [malvarez@riversidetransit.com](mailto:malvarez@riversidetransit.com)  
[Website](#) | [Facebook](#) | [Twitter](#) | [Instagram](#)  
1825 Third Street, Riverside, CA 92507



## **Responses to Comment Letter J**

### **Riverside Transit Agency (RTA)**

J-1: The commenter informs that the RTA has no recommendations to submit for the Project at this time. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR; thus, no further response is required.

COMMENT LETTER K

**From:** [Sahar Ghadimi](#)  
**To:** [Nathan Perez](#)  
**Cc:** [Sam Wang](#)  
**Subject:** Technical Data Request: for the First March Logistics Project (PLN20-05117)  
**Date:** Thursday, May 18, 2023 4:43:02 PM

Dear Nathan Perez,

South Coast AQMD staff received the Notice of Availability for Draft environmental Impact Report for **First March Logistics Project - Development Plan Review (DPR) 20-00004, and Tentative Parcel Map No. 37965 (PLN20-05117)** (South Coast AQMD Control Number: RVC230502-03). Staff is currently in the process of reviewing the DEIR. The public commenting period is from **04/28/23 – 06/12/23**.

Please provide an electronic copy of any live modeling and emission calculation files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

- CalEEMod Input Files (.csv files);
- Live EMFAC output files;
- Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources (i.e. truck operations).

You may send the above-mentioned files via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff by the end of next week (**05/24/23**). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

If you have any questions regarding this request, please contact me.

Thank you.

Sincerely,

*Sahar Ghadimi*  
Air Quality Specialist, CEQA IGR  
Planning, Rule Development & Implementation  
South Coast Air Quality Management District  
21865 Copley Drive, Diamond Bar, CA 91765  
(909) 396-2392  
[sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov)

K-1

## **Responses to Comment Letter K**

### **South Coast Air Quality Management District – Technical Data Request**

K-1: The commenter acknowledges receipt of the Notice of Availability for the Project Draft EIR and requests an electronic copy of any live modeling and emissions calculation files used to quantify the air quality impacts from construction and/or operation of the Project including CalEEMod Input files, Live EMFAC output files, and any emission calculation files used to calculate the Project's emission sources. Urban Crossroads, Inc. provided South Coast AQMD with the requested modeling files on May 19, 2023. This comment does not raise any issues concerning the environmental analysis provided in the Draft EIR; thus, no further response is required.

### **SECTION 3.0 DRAFT EIR CLARIFICATIONS AND REVISIONS**

Any corrections to the Draft Supplemental Environmental Impact Report (EIR) generated by the City of Perris or in response to comments received are stated in this section of the Final EIR. The Draft EIR has not been modified and published in its entirety as a single document to reflect these EIR modifications.

The information included in these Draft EIR revisions do not constitute substantial new information that requires recirculation of the Draft EIR. Section 15088.5 of the State CEQA Guidelines states in part:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:
  - (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
  - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
  - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
  - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The changes to the Draft EIR included in these modifications do not constitute “significant” new information because:

- No new significant environmental impacts would result from the project or from a new mitigation measure.
- There is no substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted that reduce the identified significant impacts to a level of insignificance.

- No feasible project alternative or mitigation measure considerably different from others previously analyzed has been proposed or identified that would clearly lessen the significant environmental impacts of the project.
- The Draft EIR is not fundamentally or basically inadequate or conclusory in nature such that meaningful public review and comment were precluded.

Therefore, recirculation of the Draft EIR is not required because the new information added to the EIR through these modifications clarifies information already provided or makes insignificant modifications to the already adequate Draft EIR.

The EIR modifications contained below are in the same order as the information appears in the Draft EIR. Changes in text are signified by strikeouts (~~strikeouts~~) where text has been removed and by bold underline (**underline**) where text has been added. The applicable page numbers from the Draft EIR are also provided where necessary for easy reference.

### **Section 1.0, Executive Summary**

1. Page 1-16, Table 1-1, Summary of Environmental Impacts for the Project is hereby modified in response to Response to Comment C-7.

#### **MM 4-2**

The Project Proponent shall compensate for **0.18 acres of permanent impacts to MSHCP riparian/riverine resources** through the purchase of **at least 0.18 acres of riparian establishment mitigation credits and 0.36 acre** of a combination of rehabilitation, re-establishment, and/or establishment mitigation credits at an approved mitigation bank or in-lieu fee program within the San Jacinto River and/or Santa Ana River Watershed, such as the Riverpark Mitigation Bank. If enhancement or preservation credits are pursued due to the lack of availability of rehabilitation, re-establishment, and/or establishment mitigation credits, the ratio may be higher as determined on a case-by-case basis by the wildlife agencies.

**The Project Proponent shall provide proof of the completed purchase of the mitigation credits to the City and the Wildlife Agencies prior to the issuance of grading permit for the Project. Proof of purchase would consist of (1) a receipt from the Riverpark Mitigation Bank for the Project Proponent's purchase of at least 0.18 acres of riparian establishment mitigation credits and 0.36 acres of establishment, re-establishment, or rehabilitation credits, plus (2) a copy of the purchase contract/purchase agreement between the Riverpark Mitigation Bank and the Applicant. The purchase agreement should name the First March Logistics Project as the development project for which the mitigation credits are being purchased.**

2. Page 1-17, Table 1-1, Summary of Environmental Impacts for the Project is hereby modified in response to Response to Comment C-9.

**MM 4-3**

**Prior to the issuance of a grading permit for the Project and prior to the start of Project activities, the Applicant shall notify the California Department of Fish and Wildlife (CDFW) of impacts to Fish and Game Code section 1602 resources. The Applicant shall either receive a Streambed Alteration Agreement (SAA) or written documentation from CDFW that a SAA is not needed.**

**The notification to CDFW should provide the following information:**

- **A stream delineation including the bed, bank and channel;**
- **Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Project. This includes impacts as a result of routine maintenance and fuel modification. Plant community names should be provided based on vegetation association and/or alliance per the Manual of California Vegetation (Sawyer et al 2009);**
- **A discussion as to whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and**
- **A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site.**

**All mitigation measures and conditions contained within the above permits shall be implemented. At a minimum, the following shall be completed for mitigation for impacts to waters of the state and jurisdictional streambed:**

The Project Proponent shall compensate for permanent impacts to 0.03 acre of Regional Board jurisdiction **and 0.18 acre of CDFW jurisdiction at no less than 3:1 for impacts to streams and associated natural communities, or at a ratio acceptable to CDFW per a LSA Agreement. Mitigation should occur within the Western Riverside County. On-site mitigation measures may include the enhancement of existing streams. A conceptual Habitat Mitigation and Monitoring Plan shall be prepared, if necessary, for the enhancement activities to address impacts to Fish and Game Code section 1602 resources, which may include non-native species removal and revegetation followed by periodic monitoring. The plan shall specify the criteria and standards by which the enhancement actions will compensate for impacts of the project on streams.** ~~at a 2:1 mitigation-to-impact ratio through the purchase of 0.36 acre of rehabilitation (inclusive of the 0.03 acre of Regional Board jurisdiction collectively within the 0.18 acre of CDFW jurisdiction), reestablishment, and/or establishment mitigation credits at an~~

~~approved mitigation bank or in-lieu fee program within the San Jacinto River and/or Santa Ana River Watershed, such as the Riverpark Mitigation Bank. If enhancement or preservation credits are pursued due to the lack of availability of rehabilitation, re-establishment, and/or establishment mitigation credits, the ratio may be higher as determined on a case-by-case basis by the Regional Board and/or CDFW. The mitigation receipt from this fee payment will be provided to the Lead Agency prior to initiation of jurisdictional impacts.~~

3. Page 1-19, Table 1-1, Summary of Environmental Impacts for the Project is hereby modified in response to Response to Comment C-4.

**MM 4-5** **Prior to the issuance of grading permits, the Project Applicant shall place a note on the grading plans to require that a qualified biologist conduct a training session for project personnel prior to any grading activities. The training shall include a description of the species of concern and its habitats, the general provisions of the Endangered Species Act (Act) and the MSHCP, the need to adhere to the provisions of the Act and the MSHCP, the penalties associated with violating the provisions of the Act, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project site boundaries within which the project activities must be accomplished.**

4. Page 1-48, Table 1-1, Summary of Environmental Impacts for the Project is hereby modified due minor modifications to the site plan to add an additional driveway.

**PDF 14-3** Prior to the issuance of occupancy permits, the Project proponent shall construct the truck access roadway improvements ~~at the following driveways~~ to provide the necessary curb radii to accommodate a truck with a 67-foot wheelbase as provided on the approved site plan.

- ~~• Natwar Lane/Driveway 3 & Driveway 1 shall provide a 40-foot curb radius.~~
- ~~• Natwar Lane & Driveway 2 shall provide a 45-foot curb radius.~~
- Western Way & Driveway 4 shall provide a 40-foot curb radius.

### **Section 3.0, Project Description**

1. Pursuant to the changes requested by the City's Planning staff, Figure 3-4, *Overall Site Plan*, is hereby modified to depict changes to an additional driveway to the Building 1.
2. Figure 3-5, *Conceptual Site Plan – Building 1*, is hereby modified to depict changes to an additional driveway to the Building 1.
3. Page 3-17 is hereby modified to depict changes to an additional driveway to the Building 1.

Regardless of the truck route used, truck and automobile access to the Project site would be provided from Natwar Lane via ~~three~~four Project driveways.

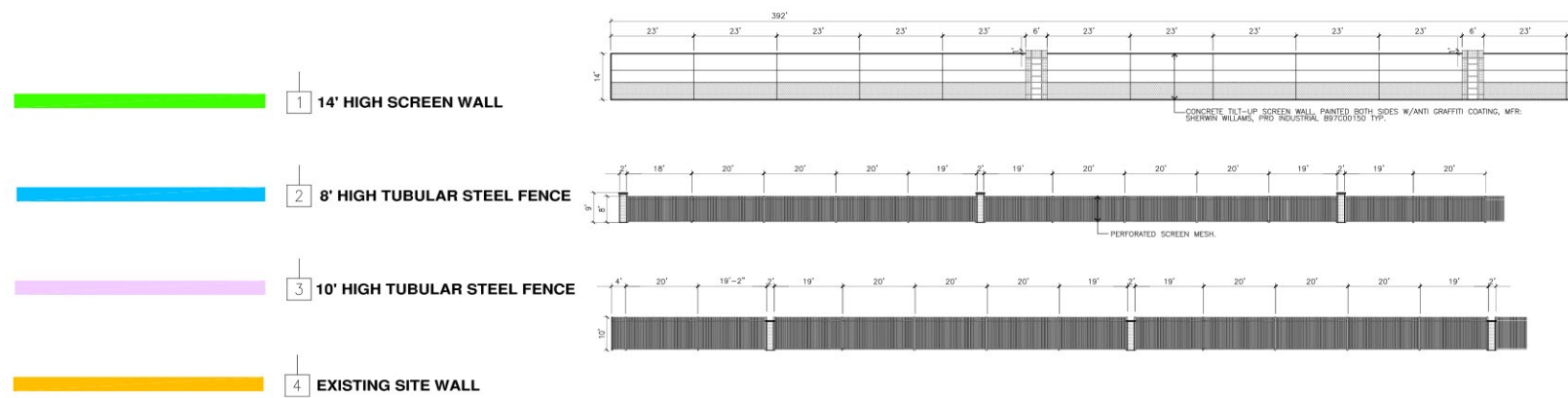
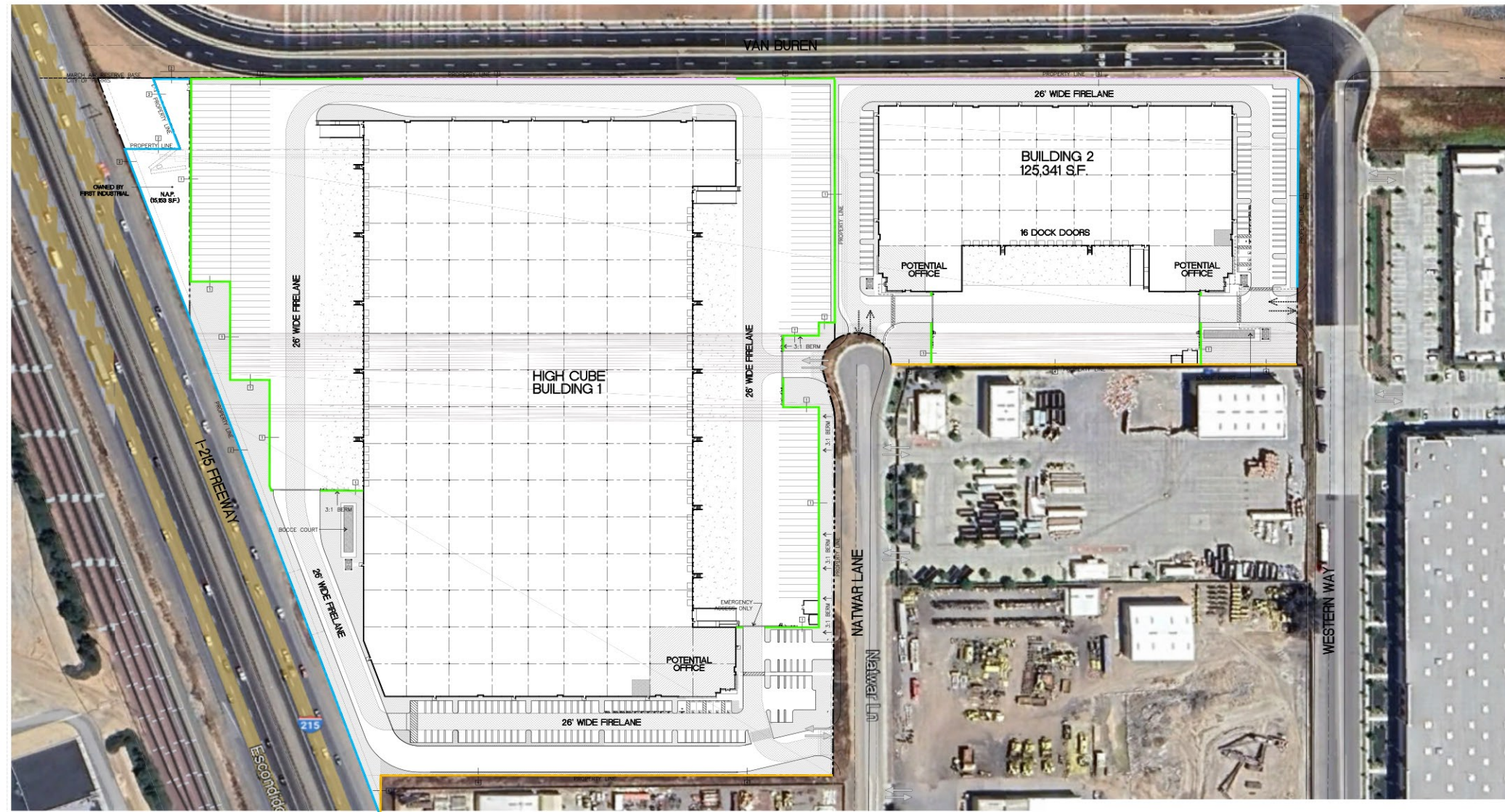
4. Page 3-19 is hereby modified to depict changes to the site plan.

## **Parking**

The Project is designed to comply with Section 4.2.2.4 of the PVCCSP and Chapter 19.69 of the City of Perris Zoning Ordinance related to parking requirements. As shown on the conceptual site plans presented on Figure 3-5 and Figure 3-6, the Project is designed to include a total of ~~184~~<sup>183</sup> surface automobile spaces: ~~107~~<sup>106</sup> automobile spaces for Building 1, and 77 automobile spaces for Building 2. Additionally, ~~169~~<sup>174</sup> trailer spaces would be provided: ~~137~~<sup>142</sup> trailer spaces for Building 1, and 32 trailer spaces for Building 2. Automobile parking would consist of standard spaces, van accessible spaces, and accessible spaces. The automobile parking would meet or exceed the required amount of 106 spaces for Building 2 and 74 spaces for Building 1. Of the parking spaces provided, ~~11~~<sup>13</sup> of the spaces at Building 1 would be designated for electric vehicle (EV) parking with 6 installed EV chargers at time of Project opening and Building 2 would have ~~8~~<sup>9</sup> designated EV spaces with 4 installed EV chargers at the time of Project opening.

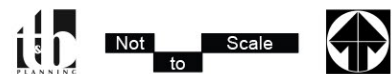
5. Figure 3-11, Conceptual Landscape Plan, on Page 3-20 of the Draft EIR is hereby modified to depict the landscape plan in color.
6. Page 3-21 of the Draft EIR has been revised in response to Response to Comment E-2 as follows:

A combination of screen walls and fencing would be provided on the Project site for screening, privacy, noise control, and security. Figure 3-12, *Screen Wall and Fence Plan – Part 1*, and Figure 3-13, *Screen Wall and Fence Plan – Part 2*, depicts the location of the proposed walls and fences and the typical elevations. As shown, 14-foot-high concrete tilt-up screen walls would be provided along part of the northern boundary of the Building 1 site, the perimeter of the truck trailer parking areas on the eastern and western sides of the Building 1 site, and the perimeter of the truck trailer parking areas on the southern side of the Building 2 site. Wrought iron fencing (~~8~~<sup>10</sup> feet high) would be provided along the perimeters of the Project site, with the exception of the western boundary of the Building 1 site and northern and southern boundaries of the Building 2 site.



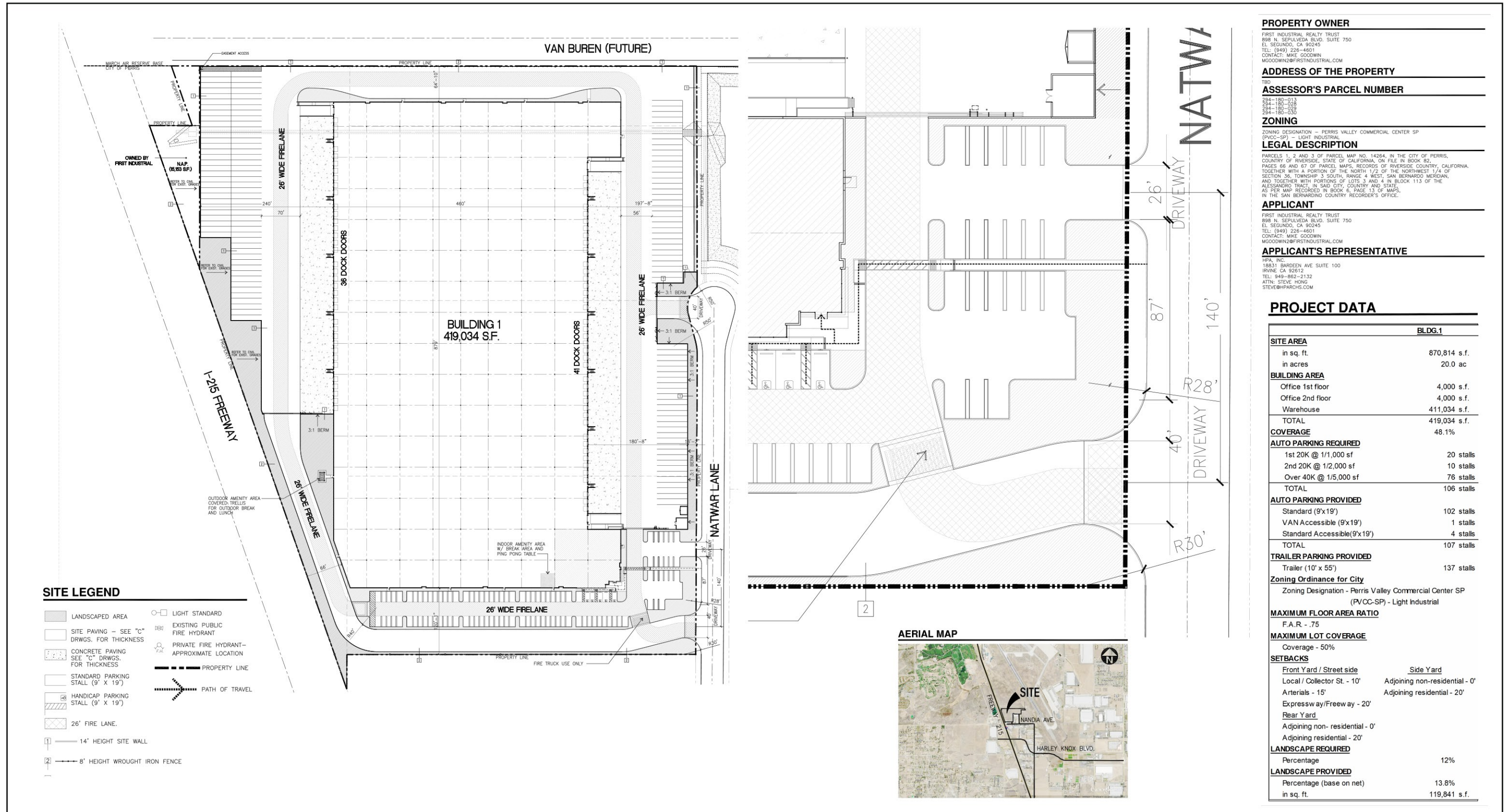
Source(s): HPA (02-20-2024)

Figure 3-4



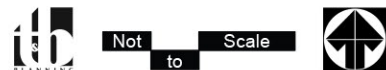
Lead Agency: City of Perris

Overall Site Plan

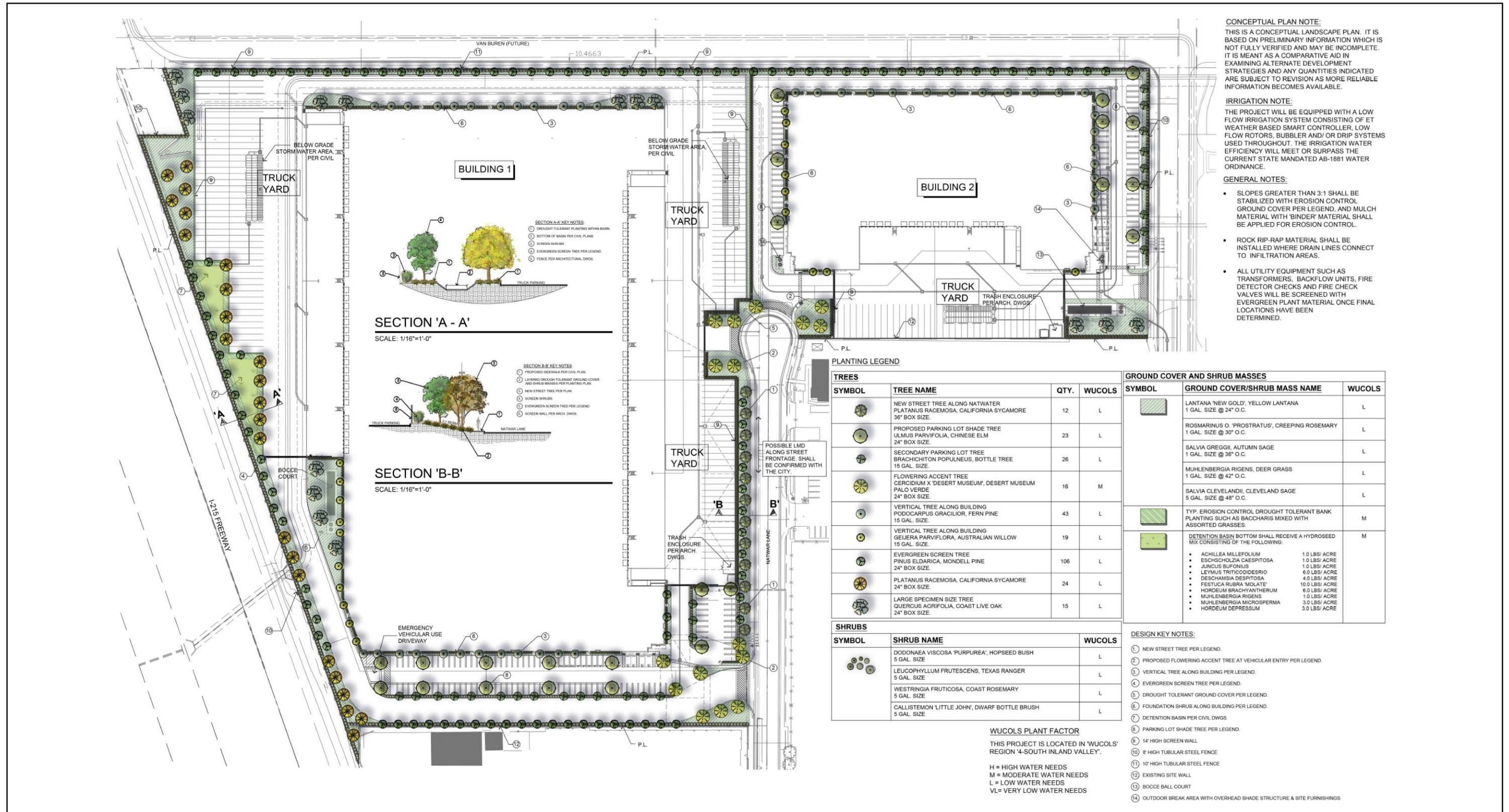


Source(s): HPA (02-16-2024)

Figure 3-5

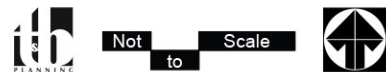


Conceptual Site Plan - Building 1



Source(s): RLA (10-30-2023)

Figure 3-11



7. Pages 3-33 and 3-34, Table 3-4, Project Related Approvals/Permits are hereby modified for clarifications on required Project approvals.

Public Agency	Approvals and Decisions
<b>Proposed Project – City of Perris Discretionary Approvals</b>	
City of Perris Planning Commission	<ul style="list-style-type: none"> <li>• Certification of the EIR with the determination that the EIR has been prepared in compliance with the requirements of CEQA.</li> <li>• Development Plan Review (DPR) (Case No. 20-00004) for the First March Logistics Project site plan and building elevations.</li> <li>• Tentative Parcel Map (Case No. 37965)</li> </ul>
<b>Subsequent City of Perris Non-discretionary Approvals</b>	
City of Perris	<ul style="list-style-type: none"> <li>• Review and approval of off-site infrastructure plans, including street and utility improvements pursuant to the conditions of approval;</li> <li>• Review all on-site plans, including grading and on-site utilities; and</li> <li>• Approval of a Final Water Quality Management Plans (FWQMP) to mitigate post-construction runoff flows.</li> </ul>
<b>Other Agencies – Subsequent Approvals and Permits</b>	
Regional Water Quality Board (RWQCB)	<ul style="list-style-type: none"> <li>• Issuance of a Construction Activity General Construction Permit.</li> <li>• Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit.</li> </ul>
<b><u>California Department of Fish and Wildlife</u></b>	<ul style="list-style-type: none"> <li>• <b><u>Approval of Determination of Biologically Equivalent or Superior Preservation</u></b></li> <li>• <b><u>Issuance of a Section 1602 Streambed Alteration Agreement</u></b></li> </ul>
<b><u>Riverside County Flood Control and Water Conservation District</u></b>	<ul style="list-style-type: none"> <li>• <b><u>Approval of master plan of drainage infrastructure</u></b></li> </ul>
<del>Eastern Municipal Water District (EMWD)</del>	<del>• Approval of Water Supply Assessment and water and sewer improvement plans.</del>
South Coast Air Quality Management District (SCAQMD)	<ul style="list-style-type: none"> <li>• Permits to construct and/or permits to install and operate new stationary sources of equipment that emit or control air contaminants, such as HVAC units and diesel fire water pumps.</li> </ul>
Other Utility Agencies	<ul style="list-style-type: none"> <li>• Permits and associated approvals, as necessary for the installation of new utility infrastructure or connections to existing facilities.</li> </ul>

**Section 4.3, Air Quality**

1. Page 4.3-15 is hereby modified to correct a typographical error.

- **Outdoor portable water use in landscaped areas.** Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources’ Model Water Efficient Landscape Ordinance (MWEL0), whichever is more stringent (5.304.1).

#### **Section 4.4, Biological Resources**

1. Page 4.4-23 is hereby modified in response to Response to Comment C-7.

MM 4-2 The Project Proponent shall compensate for **0.18 acres of permanent impacts to MSHCP riparian/riverine resources** through the purchase of **at least 0.18 acres of riparian establishment mitigation credits and 0.36 acre** of a combination of rehabilitation, re-establishment, and/or establishment mitigation credits at an approved mitigation bank or in-lieu fee program within the San Jacinto River and/or Santa Ana River Watershed, such as the Riverpark Mitigation Bank. If enhancement or preservation credits are pursued due to the lack of availability of rehabilitation, re-establishment, and/or establishment mitigation credits, the ratio may be higher as determined on a case-by-case basis by the wildlife agencies.

**The Project Proponent shall provide proof of the completed purchase of the mitigation credits to the City and the Wildlife Agencies prior to the issuance of grading permit for the Project. Proof of purchase would consist of (1) a receipt from the Riverpark Mitigation Bank for the Project Proponent's purchase of at least 0.18 acres of riparian establishment mitigation credits and 0.36 acres of establishment, re-establishment, or rehabilitation credits, plus (2) a copy of the purchase contract/purchase agreement between the Riverpark Mitigation Bank and the Applicant. The purchase agreement should name the First March Logistics Project as the development project for which the mitigation credits are being purchased.**

2. Page 4.4-23 is hereby modified in response to Response to Comment C-9.

MM 4-3 **Prior to the issuance of a grading permit for the Project and prior to the start of Project activities, the Applicant shall notify the California Department of Fish and Wildlife (CDFW) of impacts to Fish and Game Code section 1602 resources. The Applicant shall either receive a Streambed Alteration Agreement (SAA) or written documentation from CDFW that a SAA is not needed.**

**The notification to CDFW should provide the following information:**

- **A stream delineation including the bed, bank and channel;**
- **Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily impacted by the Project. This includes impacts as a result of routine maintenance and fuel modification. Plant community names should be provided based on vegetation association and/or alliance per the Manual of California Vegetation (Sawyer et al 2009);**
- **A discussion as to whether impacts on streams within the Project site would impact those streams immediately outside**

of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and

- A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site.

All mitigation measures and conditions contained within the above permits shall be implemented. At a minimum, the following shall be completed for mitigation for impacts to waters of the state and jurisdictional streambed:

The Project Proponent shall compensate for permanent impacts to 0.03 acre of Regional Board jurisdiction and 0.18 acre of CDFW jurisdiction at no less than 3:1 for impacts to streams and associated natural communities, or at a ratio acceptable to CDFW per a LSA Agreement. Mitigation should occur within the Western Riverside County. On-site mitigation measures may include the enhancement of existing streams. A conceptual Habitat Mitigation and Monitoring Plan shall be prepared, if necessary, for the enhancement activities to address impacts to Fish and Game Code section 1602 resources, which may include non-native species removal and revegetation followed by periodic monitoring. The plan shall specify the criteria and standards by which the enhancement actions will compensate for impacts of the project on streams. ~~at a 2:1 mitigation-to-impact ratio through the purchase of 0.36 acre of rehabilitation (inclusive of the 0.03 acre of Regional Board jurisdiction collectively within the 0.18 acre of CDFW jurisdiction), reestablishment, and/or establishment mitigation credits at an approved mitigation bank or in-lieu fee program within the San Jacinto River and/or Santa Ana River Watershed, such as the Riverpark Mitigation Bank. If enhancement or preservation credits are pursued due to the lack of availability of rehabilitation, re-establishment, and/or establishment mitigation credits, the ratio may be higher as determined on a case-by-case basis by the Regional Board and/or CDFW. The mitigation receipt from this fee payment will be provided to the Lead Agency prior to initiation of jurisdictional impacts.~~

3. Page 4.4-29 is hereby modified in response to Response to Comment C-4.

#### ***Additional Project-Level Mitigation Measures***

**Project-level mitigation measures MM 4-1 and MM 4-2** ~~No additional mitigation measures are required.~~

**MM 4-5** Prior to the issuance of grading permits, the Project Applicant shall place a note on the grading plans to require that a qualified biologist conducts a training session for project personnel prior to any grading activities. The training shall include a description of the species of concern and its habitats, the general provisions of the Endangered Species Act (Act) and the MSHCP, the need to adhere to the provisions of the Act and the MSHCP, the penalties

**associated with violating the provisions of the Act, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project site boundaries within which the project activities must be accomplished.**

#### **Section 4.8, Greenhouse Gas Emissions**

1. Page 4.8-10 is hereby modified to correct a typographical error.
  - **Outdoor portable water use in landscaped areas.** Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).

#### **Section 4.14, Transportation**

1. Page 4.14-17 is hereby modified due minor modifications to the site plan to add an additional driveway.

**PDF 14-3** Prior to the issuance of occupancy permits, the Project proponent shall construct the truck access roadway improvements ~~at the following driveways~~ to provide the necessary curb radii to accommodate a truck with a 67-foot wheelbase as provided on the approved site plan.

  - ~~• Natwar Lane/Driveway 3 & Driveway 1 shall provide a 40-foot curb radius.~~
  - ~~• Natwar Lane & Driveway 2 shall provide a 45-foot curb radius.~~
  - Western Way & Driveway 4 shall provide a 40-foot curb radius.

#### **Section 4.16, Utilities and Service Systems**

2. Page 4.16-3 is hereby modified to correct a typographical error.

The EMWD's primary retail customers for potable/raw water can be divided into residential, commercial, industrial, institutional, and landscape sectors. The residential sector is the EMWD's largest customer segment; however, each sector plays a role in the growth and development of the EMWD's service area. The industrial sector represented 0.7 percent of the overall portable water use in the EMWD's service area (571-acre feet [AF] of the 84,673 AF delivered). This trend is projected to continue with the industrial sector representing 0.6 percent of the potable water projected to be delivered in 2045 (700 AF of the 123,000 AF projected to be delivered).

#### **Section 5.0, Alternatives**

1. Page 5.2 is hereby modified to depict changes to an additional driveway to Building 1.

Truck and automobile access to the Project site would be provided from Natwar Lane via ~~three~~four Project driveways. Access would also be provided from one driveway off Western Way. A roadway (Van Buren Boulevard) connecting to March Air Reserve Base/Inland Port

Airport (MARB/IPA) will be constructed adjacent to the northern boundary of the Project site; the roadway would not be developed as part of the Project.

### **Technical Appendices**

The Traffic Impact Analysis (Technical Appendix K1 of the Draft EIR) has been updated in response to City's review and does not contain new significant information or change the findings of the Draft EIR. The technical appendix is incorporated herein as Attachment A of this Final EIR.

## **SECTION 4.0 MITIGATION MONITORING AND REPORTING PROGRAM**

### **4.1 INTRODUCTION**

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared for use in ensuring the implementation of the required mitigation for the First March Logistics Project (Project). The MMRP has been prepared in compliance with State law and the First March Logistics Project Final Environmental Impact Report (EIR) (State Clearinghouse No. 2021120497).

The California Environmental Quality Act (CEQA) requires adoption of a reporting or monitoring program for the measures that are placed on a project to mitigate or avoid adverse effects on the environment (*California Public Resources Code*, Section 21081.6). The law states that the reporting or monitoring program shall be designed to ensure compliance during project implementation. The monitoring program generally contains the following elements:

- 1) The mitigation measures are recorded with the action and procedure necessary to ensure compliance. In some instances, one action may be used to verify implementation of several mitigation measures.
- 2) A procedure for compliance and verification has been outlined for each action necessary. This procedure designates who will take action, what action will be taken and when, and to whom and when compliance will be reported.
- 3) The program has been designed to be flexible. As monitoring progresses, changes to compliance procedures may be necessary based upon recommendations by those responsible for the program. As changes are made, new monitoring compliance procedures and records will be developed and incorporated into the program.

This MMRP includes mitigation measures (MMs) from the Perris Valley Commerce Center Specific Plan (PVCCSP) EIR and Project-specific mitigation measures outlined in the First March Logistics Final EIR.

### **4.2 MITIGATION MONITORING AND RESPONSIBILITIES**

As the Lead Agency, the City of Perris (City) is responsible for ensuring full compliance with the mitigation measures adopted for the Project. The City will monitor and report on all mitigation activities. Mitigation measures will be implemented at different stages of development throughout the project area. In this regard, the responsibilities for implementation have been assigned to the Applicant, Contractor, or a combination thereof. If during the course of project implementation, any of the mitigation measures identified herein cannot be successfully implemented, the City shall be immediately informed, and the City will then inform any affected responsible agencies. The City, in conjunction with any affected responsible agencies, will subsequently determine if modification to the Project is required and/or whether alternative mitigation is appropriate.

**4.3 MITIGATION MONITORING AND REPORTING PROGRAM CHECKLIST**

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
<b>Aesthetics</b>							
Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area during construction.	<p><b>Applicable PVCCSP Mitigation Measures</b></p> <p>Refer to PVCCSP EIR mitigation measures <b>MM Haz 3</b> and <b>MM Haz 5</b>, which address potential hazards to MARB/IPA operations but are also relevant to the analysis of light and glare impacts</p>						
	<p><b>Additional Project-Level Mitigation Measures</b></p> <p><b>MM 1-1</b> 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 residential properties. Compliance with this measure shall be verified by the City of Perris' Building Division during construction.</p>						
		Prior to issuance of grading permits	Confirmation that this requirement is included in Contractor Specifications	City of Perris Building Division			
<b>Air Quality</b>							
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.	<p><b>Applicable PVCCSP Mitigation Measures</b></p>						
	<p><b>MM Air 1</b> To identify potential implementing development project-specific impacts resulting from construction activities, proposed development projects that are subject to CEQA shall have construction-related air quality impacts analyzed using the latest available URBEMIS model, or other analytical method determined in conjunction with the South Coast AQMD. 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 South Coast AQMD's Localized Significance Threshold analysis or other appropriate analyses as determined in conjunction with South Coast AQMD. 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.</p> <p><b>The Project-specific construction-related air quality and LST analyses required by this PVCCSP EIR mitigation measure have been provided in the Air Quality Impact Analysis included in Appendix C1 of this EIR to comply with this mitigation measure. The URBEMIS model has been replaced by CalEEMod.</b></p>		<p><b>Mitigation measure completed with preparation of the Draft EIR.</b></p>				

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	<p><b>MM Air 2</b> 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.</p>	Prior to issuance of grading permits	Approval of required traffic control plan	City of Perris Planning & Engineering Department			
	<p><b>MM Air 3</b> 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:</p> <ul style="list-style-type: none"> <li>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),</li> <li>keeping disturbed/loose soil moist at all times,</li> <li>requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered,</li> <li>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,</li> <li>posting and enforcement of traffic speed limits of 15 miles per hour or less on all unpaved portions of the project site,</li> <li>suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 miles per hour,</li> <li>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,</li> <li>sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and</li> </ul>	Prior to issuance of grading permits	Submittal of dust control plan approved by the SCAQMD or other sufficient proof of compliance with Rule 403	City of Perris Planning Division			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	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.						
	<b>MM Air 4</b> Building and grading permits shall include a restriction that limits idling of construction equipment on site to no more than five minutes.	Prior to issuance of building and grading permits	Confirmation that building and grading permits include required restriction	City of Perris Building Division			
	<b>MM Air 5</b> 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.	Prior to issuance of grading permits	Confirmation that this requirement is included in Contractor Specifications	City of Perris Building Division			
	<b>MM Air 6</b> The developer of each implementing development project shall require, by contract specifications, the use of alternative fueled off-road construction equipment, the use of construction equipment that demonstrates early compliance with off-road equipment with the CARB in-use off-road diesel vehicle regulation (SCAQMD Rule 2449) and/or meets or exceeds Tier 3 standards with available CARB verified or USEPA certified technologies. Diesel equipment shall use water emulsified diesel fuel such as PurINOx unless it is unavailable in Riverside County at the time of project construction activities. Contract specifications shall be included in project construction documents, which shall be reviewed by the City of Perris' Building Division prior to issuance of a grading permit.	Prior to issuance of grading permit	Confirmation that this requirement is included in Contractor Specifications	City of Perris Building Division			
	<b>MM Air 7</b> During construction, ozone precursor emissions from mobile construction equipment shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturers' specifications to the satisfaction of the City of Perris' Building Division. Equipment maintenance records and equipment design specification data sheets shall be kept on-site during construction. Compliance with this measure shall be subject to periodic inspections by the City of Perris' Building Division.	Prior to issuance of grading and building permits  During construction	Confirmation that this requirement is included in Contractor Specifications  Periodic review of equipment maintenance records and equipment design specifications data sheets by City	City of Perris Building Division			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	<b>MM Air 8</b> Each individual implementing development project shall apply paints using either high volume low pressure (HVL) spray equipment with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.	Prior to issuance of building permits	Confirmation that this requirement is included in Contractor Specifications	City of Perris Building Division			
	<b>MM Air 9</b> 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.	Prior to issuance of building permits	Confirmation that this requirement is included in Contractor Specifications	City of Perris Building Division			
	<b>MM Air 10</b> To identify potential implementing development project-specific impacts resulting from operational activities, proposed development projects that are subject to CEQA shall have long-term operational-related air quality impacts analyzed using the latest available URBEMIS model, or other analytical method determined by the City of Perris as lead agency in conjunction with the SCAQMD. The results of the operational-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Threshold analysis, CO Hot Spot analysis, or other appropriate analyses as determined by the City of Perris in conjunction with SCAQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.	<b>Mitigation measure completed with preparation of the Draft EIR.</b>					
	<b>MM Air 11</b> Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of five minutes.	Prior to issuance of certificate of occupancy and periodically after development	Confirmation that this requirement is included in Contractor Specifications  Inspection to confirm signage posted	City of Perris Building Division			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	<p><b>MM Air 13</b> In order to promote alternative fuels, and help support “clean” truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD’s Carl Moyer Program, or other state programs that restrict operations to “clean” trucks, such as 2007 or newer model year or 2010 compliant vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year would be used at a facility with three or more dock-high doors, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP [On-road Heavy Duty Voucher Incentive Program], HVIP [Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project], and SOON [Surplus Off-Road Opt-in for NOx] funding programs, as identified on SCAQMD’s website (<a href="http://www.aqmd.gov">http://www.aqmd.gov</a>). Tenants would be required to use those funds, if awarded.</p>	Prior to certificate of occupancy for buildings and tenant improvements	Confirmation that tenants have been provided with information regarding funding for cleaner than required heavy-duty engines and emission control devices	City of Perris Planning Division			
	<p><b>MM Air 14</b> 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 certificate of occupancy.</p>	Prior to certificate of occupancy	Confirmation during plot plan review that parking spaces have been designated for high-occupancy vehicles and ride-sharing vans	City of Perris Planning Division			
	<p><b>MM Air 15</b> 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 [Transport Refrigeration Units] per day, or TRU operations exceeding 300 hours per week, and that are subject to CEQA and are located adjacent to sensitive land uses; shall have a facility-specific Health Risk Assessment performed to assess the diesel particulate matter impacts from mobile-source traffic generated by that implementing development project. The results of the Health Risk Assessment shall be included in the CEQA documentation for each implementing development project.</p>	<b>Mitigation measure completed with preparation of the Draft EIR.</b>					
	<p><b>MM Air 18</b> 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</p>	<b>Mitigation measure completed with preparation of the Draft EIR.</b>					

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	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.						
	<b>MM Air 19</b> 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.	In conjunction with street and utility plans and prior to the City accepting the street improvements	Verification by City of incorporation of project design features and approval of street and utility plans	City of Perris Planning and Building Divisions			
	<b>MM Air 20</b> 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 requirements 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.	Prior to issuance of building permits	Submission of a Title 24 worksheet with building plans	City of Perris Building Division			
Expose sensitive receptors to substantial pollutant concentrations.	<p><b>Applicable PVCCSP Mitigation Measures</b></p> <p>Refer to previously referenced PVCCSP EIR mitigation measures <b>MM Air 1</b> through <b>MM Air 10</b> and <b>MM Air 15</b> above.</p>						
<b>Biological Resources</b>							
Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans,	<b>Applicable PVCCSP Mitigation Measures</b>						
	<b>MM Bio 2</b> Project-specific habitat assessments and focused surveys for burrowing owls would be conducted for implementing development or infrastructure projects within burrowing owl survey areas. A pre-construction survey for resident burrowing owls would also be conducted by a qualified biologist within 30 days prior to commencement of grading and	Project-specific habitat assessments and focused surveys, if required, will be prepared in	Habitat assessments, focused surveys, pre-construction	City of Perris Planning Division			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
<p>policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.</p>	<p>construction activities within those portions of implementing project sites containing suitable burrowing owl habitat and for those properties within an implementing project site where the biologist could not gain access. If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity would be conducted in accordance with the current Burrowing Owl Instruction for the Western Riverside MSHCP.</p> <p>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.</p> <p>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 Division 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 owls from their burrows (outside the breeding season or once the young are able to leave the nest and fly) by installing one-way doors in burrow entrances. These one-way doors allow the owl to exit the burrow, but not enter it. These doors shall be left in place 48 hours to ensure owls have left the burrow. Artificial burrows shall be provided nearby. The implementing project area shall be monitored daily for one week to confirm owl use of burrows before excavating burrows in the impact area. Burrows shall be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible pipe shall be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow. The 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 infeasible, then a DBESP would be required, including associated relocation of burrowing owls. If conservation is not required, then owl relocation would still be required following accepted protocols. Take of active nests would be avoided, so it is strongly recommended that any relocation occur outside of the nesting season.</p>	<p>conjunction with development applications as part of the CEQA process</p> <p>Pre-construction surveys to be conducted no more than 30 days prior to grading or construction activities</p>	<p>surveys to be provided to City of Perris Planning Division</p>				
<p><b>Additional Project-Level Mitigation Measures</b></p>							

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	<p><b>MM 4-1</b> 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 construction activities (i.e., vegetation clearing, grubbing, tree removal, site watering) at the Project site. The preconstruction survey shall be conducted in accordance with the current Burrowing Owl Survey Instructions for the Western Riverside MSHCP. The results of the survey shall be submitted to the City and the California Department of Fish and Wildlife (CDFW) within three (3) days of survey completion and prior to obtaining a grading permit. If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the preconstruction survey, the area shall be resurveyed for owls.</p> <p>If no burrowing owls are observed during the survey, site preparation and construction activities may begin with an approved grading plan.</p> <p>If burrowing owl are found to be present, then avoidance or minimization measures shall be undertaken in consultation with the City, the CDFW, and the U.S. Fish and Wildlife Service (USFWS). The CDFW shall be sent written notification within 48 hours of the detection of the burrowing owls. No construction activities shall occur until no sign is present that the burrows are being used by adult or juvenile owls or following CDFW approval of a Burrowing Owl Plan as described below.</p> <p>The Project biologist and Project Proponent shall coordinate with the City, the CDFW, and the USFWS to develop a Burrowing Owl Plan in accordance with the guidelines in the CDFW Staff Report on Burrowing Owl (March 2012). The Burrowing Owl Plan shall describe proposed avoidance, relocation, monitoring, minimization, and/or mitigation actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites and details on proposed buffers if avoiding the burrowing owls 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 shall also be included in the Burrowing Owl Plan. The Project Proponent shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval. A final report shall be prepared by the Project biologist documenting the results of the Burrowing Owl Plan and detailing avoidance, minimization, and mitigation measures. The final report shall be submitted to the City and the CDFW</p>	Pre-construction surveys to be conducted no more than 30 days prior to grading or construction activities	Pre-construction surveys to be provided to City of Perris Planning Division	City of Perris Planning Division			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	<p>within 30 days of completion of the Burrowing Owl Plan requirements.</p> <p>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 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.</p>						
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 by the U.S. Fish and Wildlife	<b>Applicable PVCCSP Mitigation Measures</b>						
	<p><b>MM Bio 4</b> 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 covered species. Riparian vegetation will also need to be evaluated for the least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo.</p>	<b>Mitigation measure completed with preparation of the Draft EIR.</b>					
	<b>Additional Project-Level Mitigation Measures</b>						
	<p><b>MM 4-2</b> The Project Proponent shall compensate for 0.18 acres of permanent impacts to MSHCP riparian/riverine resources through the purchase of at least 0.18 acres of riparian establishment mitigation credits and 0.36 acre of a combination of rehabilitation, re-establishment, and/or establishment mitigation credits at an approved mitigation bank or in-lieu fee program within the San Jacinto River and/or Santa Ana River Watershed, such as the Riverpark Mitigation Bank. If enhancement or preservation credits are pursued due to the lack of availability of rehabilitation, re-establishment, and/or establishment mitigation credits, the ratio may be higher as determined on a case-by-case basis by the wildlife agencies.</p> <p>The Project Proponent shall provide proof of the completed purchase of the mitigation credits to the City and the Wildlife Agencies prior to the issuance of grading permit for the Project. Proof of purchase would consist of (1) a receipt from the Riverpark Mitigation Bank for the Project Proponent's purchase of at least 0.18 acres of riparian establishment mitigation credits and 0.36 acres of establishment, re-establishment, or rehabilitation credits, plus (2) a copy of the purchase</p>	Prior to the issuance of grading permits	Confirmation that required permits have been obtained and completed.	City of Perris Planning Division			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
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	contract/purchase agreement between the Riverpark Mitigation Bank and the Applicant. The purchase agreement should name the First March Logistics Project as the development project for which the mitigation credits are being purchased.						
Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	<b>Applicable PVCCSP Mitigation Measures</b>						
	<p><b>MM Bio 3</b> Project-specific delineations will be required to determine the limits of ACOE, RWQCB, and CDFG 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 the ACOE, a Section 401 Water Quality Certification from the RWQCB, and a Section 1602 Streambed Alteration Agreement from CDFG.</p>	Prior to issuance of grading permits	Confirmation that required permits have been obtained	City of Perris Planning Division			
	<b>Additional Project-Level Mitigation Measures</b>						
	<p><b>MM 4-3</b> The Project Proponent shall compensate for permanent impacts to 0.15 acre of riparian area and 0.03 acre of riverine area at a minimum of 3:1 mitigation-to-impact ratio through the purchase of either a combination of rehabilitation, re-establishment, and/or establishment mitigation credits at an approved mitigation bank within the San Jacinto River and/or Santa Ana River Watershed, such as the Riverpark Mitigation Bank. If enhancement or preservation credits are pursued due to the lack of availability of rehabilitation, re-establishment, and/or establishment mitigation credits, the ratio may be higher as determined on a case-by-case basis by the wildlife agencies.</p> <p>Prior to the issuance of a grading permit for the Project and prior to the start of Project activities, the Applicant shall notify the California Department of Fish and Wildlife (CDFW) of impacts to Fish and Game Code section 1602 resources. The Applicant shall either receive a Streambed Alteration Agreement (SAA) or written documentation from CDFW that a SAA is not needed.</p> <p>The notification to CDFW should provide the following information:</p> <ul style="list-style-type: none"> <li>• A stream delineation including the bed, bank and channel;</li> <li>• Linear feet and/or acreage of streams and associated natural communities that would be permanently and/or temporarily</li> </ul>	Prior to the issuance of grading permits	<p>Confirmation that required permits have been obtained</p> <p>Confirmation that permit requirements have been completed.</p>	City of Perris Planning Division			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
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	<p>impacted by the Project. This includes impacts as a result of routine maintenance and fuel modification. Plant community names should be provided based on vegetation association and/or alliance per the Manual of California Vegetation (Sawyer et al 2009);</p> <ul style="list-style-type: none"> <li>• A discussion as to whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed; and</li> <li>• A hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site.</li> </ul> <p>All mitigation measures and conditions contained within the above permits shall be implemented. At a minimum, the following shall be completed for mitigation for impacts to waters of the state and jurisdictional streambed:</p> <ul style="list-style-type: none"> <li>• The Project Proponent shall compensate for permanent impacts to 0.03 acre of Regional Board jurisdiction and 0.18 acre of CDFW jurisdiction at no less than 3:1 for impacts to streams and associated natural communities, or at a ratio acceptable to CDFW per a LSA Agreement. Mitigation should occur within the Western Riverside County. On-site mitigation measures may include the enhancement of existing streams. A conceptual Habitat Mitigation and Monitoring Plan shall be prepared, if necessary, for the enhancement activities to address impacts to Fish and Game Code section 1602 resources, which may include non-native species removal and revegetation followed by periodic monitoring. The plan shall specify the criteria and standards by which the enhancement actions will compensate for impacts of the project on streams.</li> </ul>						
	<b>Applicable PVCCSP EIR Mitigation Measures</b>						
Interfere substantially with the movement of any native resident or migratory wildlife fish or wildlife species or establish native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites	<p><b>MM Bio 1</b> 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.</p> <p>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</p>	Prior to the issuance of grading permits	Pre-construction surveys to be provided to City of Perris Planning Division	City of Perris Planning Division			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	<p>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 area and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.</p>						
<b>Additional Project-Level Mitigation Measures</b>							
	<p><b>MM 4-4</b> Site preparation activities (such as ground disturbance, construction activities, staging equipment, and/or 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.</p> <p>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. The Project biologist shall be experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures.</p> <p>The pre-activity field surveys shall include the Project site and adjacent areas where Project activities have the potential to cause nest failure. The surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than 3 days prior to the initiation of Project site-preparation activities. The surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows,</p>	<p>Prior to the issuance of grading permits</p>	<p>Pre-construction surveys to be provided to City of Perris Planning Division</p>	<p>City of Perris Planning Division</p>			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
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	<p>cavities, and structures. The survey duration shall take into consideration the size of the Project site; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate.</p> <p>If no nesting birds are observed during the survey, site preparation and construction activities may be conducted during the nesting/breeding season.</p> <p>If active nests or nesting birds (including nesting raptors) are located during the pre-activity field survey, the Project biologist shall establish avoidance or minimization measures in consultation with the City of Perris and the CDFW. Measures shall include the establishment of a conservative avoidance buffer surrounding the nest based on the Project biologist's best professional judgement and experience. The Project 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 Project biologist determines that such project activities may be causing an adverse reaction, the Project 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 shall be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The Project biologist shall review and verify compliance with these nesting avoidance buffers and shall 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 City for mitigation monitoring compliance record keeping.</p>						
	<p><b>MM 4-5</b> Prior to the issuance of grading permits, the Project Applicant shall place a note on the grading plans to require that a qualified biologist conducts a training session for project personnel prior to any grading activities. The training shall include a description of the species of concern and its habitats, the general provisions of the Endangered Species Act (Act) and the MSHCP, the need to adhere to the provisions of the Act and the MSHCP, the penalties associated with violating the provisions of the Act, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project site</p>	<p>Prior to the issuance of grading permits</p>	<p>Grading plans to be provided to City of Perris Planning Division</p>	<p>City of Perris Planning Division</p>			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
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	boundaries within which the project activities must be accomplished.						
Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan.	<b>Applicable PVCCSP Mitigation Measures</b>						
	Refer to previously referenced mitigation measures <b>MM Bio 2</b> and <b>MM Bio 4</b> .						
	<b>Additional Project-Level Mitigation Measures</b>						
	Refer to previously referenced mitigation measures <b>MM 4-1</b> to <b>MM 4-3</b> .						
<b>Cultural Resources</b>							
Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.	<b>Applicable PVCCSP Mitigation Measures</b>						
	<p><b>MM Cultural 1</b> Prior to the consideration by the City of Perris of implementing development or infrastructure projects for properties that are vacant, undeveloped, or considered to be sensitive for cultural resources by the City of Perris Planning Division, a Phase I Cultural Resources Study of the subject property prepared in accordance with the protocol of the City of Perris by a professional archeologist shall be submitted to the City of Perris Planning Division for review and approval. The Phase I Cultural Resources Study shall determine whether the subject implementing development would potentially cause a substantial adverse change to any significant paleontological, archaeological, or historic resources. The Phase I Cultural Resources Study shall be prepared to meet the standards established by Riverside County and shall, at a minimum, include the results of the following:</p> <ol style="list-style-type: none"> <li>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.</li> <li>2. Sacred Lands File record search with the NAHC followed by project scoping with tribes recommended by the NAHC.</li> <li>3. Field survey of the implementing development or infrastructure project site.</li> </ol> <p>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</p>	<b>Mitigation measure completed with preparation of the Draft EIR..</b>					

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	<p>Perris) to obtain input regarding the potential for Native American resources to occur at the project site.</p> <p>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:</p> <ol style="list-style-type: none"> <li>1. Avoidance.</li> <li>2. Changes to the structure provided pursuant to the Secretary of Interior's Standards.</li> <li>3. Relocation of the structure.</li> <li>4. Recordation of the structure to Historic American Buildings Survey (HABS)/Historic American Engineering Record (HAER) standard if demolition is allowed.</li> </ol> <p>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.</p> <p>The Phase I Cultural Resources Study submitted for each implementing development or infrastructure project shall have been completed no more than three (3) years prior to the submittal of the application for the subject implementing development project or the start of construction of an implementing infrastructure project.</p>						
	<p><b>Additional Project-Level Mitigation Measures</b></p> <p><b>MM 5-1</b> Prior to the issuance of grading permits, the Project proponent/developer shall retain a professional archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology (U.S. Department of Interior, 2012; Registered Professional Archaeologist preferred). The primary task of the consulting archaeologist</p>	<p>Prior to issuance of grading permits and during subsurface excavation</p>	<p>Confirmation of professional</p>	<p>City of Perris Planning Division</p>			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
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	<p>shall be to monitor the initial ground disturbing activities within the Project site or within the off-site Project 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 within the Project site or within the offsite Project improvement areas until the archaeologist has been approved by the City.</p> <p>The archaeologist shall be responsible for monitoring ground-disturbing activities, 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 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.</p> <p>The Project proponent/developer shall also enter into an agreement with either the Soboba Band of Luiseño Indians or the Pechanga Band of Luiseño Indians for a Luiseño tribal representative (observer/monitor) to work along with the consulting archaeologist. This tribal representative will assist in the identification of Native American resources and will act as a representative between the City, the Project proponent/developer, and Native American Tribal Cultural Resources Department. The Luiseño tribal representative(s) shall be on-site during all ground-disturbing of each portion of the project site including clearing, grubbing, tree removals, grading, trenching, etc. The Luiseño tribal representative(s) should be on-site any time the consulting archaeologist is required to be on-site. Working with the consulting archaeologist, the Luiseño tribal representative(s) shall have the authority to halt, redirect, or divert any activities in areas where the identification, recording, or recovery of Native American resources are on-going. The agreement between the proponent/developer and the Luiseño tribe shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• An agreement that artifacts will be reburied on-site and in an area of permanent protection;</li> <li>• Reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist;</li> <li>• Native American artifacts that cannot be avoided or relocated at the project site shall be prepared for curation at an accredited</li> </ul>		archaeologist retention/ ongoing monitoring/ submittal of Report of Findings				

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	<p>curation facility in Riverside County that meets federal standards (per 36 CFR Part 79) and available to archaeologists/researchers for further study; and</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p>The Project proponent/developer shall submit a fully executed copy of the agreement to the City of Perris Planning Division to ensure compliance with this condition of approval. Upon verification, the City of Perris Planning Division shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.</p> <p>In the event that archaeological resources are discovered within the Project site or within the off-site Project improvement areas, the handling of the discovered resource(s) will differ, depending on the nature of the find. Consistent with California Public Resources Code Section 21083.2(b) and Assembly Bill 52 (Chapter 532, Statutes of 2014), avoidance shall be the preferred method of preservation for Native American/tribal cultural/archaeological resources. However, it is understood that all artifacts, with the exception of human remains and related grave goods or sacred/ceremonial/religious objects, belong to the property owner. The property owner will commit to the relinquishing and curation of all artifacts identified as being of Native American origin. All artifacts, Native American or otherwise, discovered during the monitoring program shall be recorded and inventoried by the consulting archaeologist.</p> <p>If any Native American artifacts are identified when Luiseño tribal representatives are not present, all reasonable measures will be taken to protect the resource(s) in situ and the City Planning Division and tribal representative will be notified. The designated Luiseño tribal representative will be given ample time to examine the find. If the find is determined to be of sacred or religious value, the Luiseño tribal representative will work with the City and project 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.</p> <p>In the event that human remains are discovered at the project site or within the off-site project improvement areas, Project-level mitigation measure MM 5-2 shall immediately apply and all items found in association with Native American human</p>						

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	<p>remains shall be considered grave goods or sacred in origin and subject to special handling.</p> <p>Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. Subsequent to analysis and reporting, these artifacts will be subjected to curation, as deemed appropriate, or returned to the property owner.</p> <p>Once grading activities have ceased or the archaeologist, in consultation with the designated Luiseño tribal representative, determines that monitoring is no longer necessary, monitoring activities can be discontinued following notification to the City of Perris Planning Division.</p> <p>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 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 submitted to the Luiseño tribe(s) involved with the Project.</p>						
Disturb any human remains, including those interred outside of formal cemeteries.	<b>Additional Project-Level Mitigation Measures</b>						
	<p><b>MM 5-2</b> In the event that human remains (or remains that may be human) are discovered at the Project site or within the off-site Project improvement areas during ground-disturbing activities, the construction contractors, Project archaeologist, and/or designated Luiseño tribal representative shall immediately stop all activities within 100 feet of the find. The project proponent shall then inform the Riverside County Coroner and the City of Perris Planning Division immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).</p> <p>If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the "Most Likely Descendent" (MLD). Despite the affiliation with any Luiseño tribal representative(s) at the site, the NAHC's identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of Native American human remains and may recommend to the project proponent means for treatment or disposition, with appropriate dignity of</p>	During construction activities	Confirmation of coroner and NAHC contact and submittal of Report of Findings, if applicable	City of Perris Planning Division			

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	<p>the human remains and any associated grave goods. The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains will be determined in consultation between the project proponent and the MLD. In the event that there is disagreement regarding the disposition of the remains, State law will apply and median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.981 and 5097.94(k)).</p> <p>The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The locations will be documented by the consulting archaeologist in conjunction with the various stakeholders and a report of findings shall be filed with the Eastern Information Center (EIC).</p>						
<b>Energy</b>							
Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation.	<p><b>Applicable PVCCSP EIR Mitigation Measures</b></p> <p>Refer to previously referenced mitigation measures <b>MM Air 19</b> and <b>MM Air 20</b>.</p>						
<b>Geology and Soils</b>							
<p>Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:</p> <p>ii) Strong seismic ground shaking.</p> <p>iii) Seismic-related ground failure, including liquefaction.</p> <p>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</p>	<p><b>Applicable PVCCSP Mitigation Measure</b></p> <p><b>MM Geo 1</b> 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.</p>	<p><b>Mitigation measure completed with preparation of the Draft EIR.</b></p>					

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spreading, subsidence, liquefaction, or collapse.  Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.							
Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	<b>Additional Project-Level Mitigation Measures</b>						
	<p><b>MM 7-1</b> Prior to the issuance of grading permits, the Project Applicant shall submit to and receive approval from the City, 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 onsite and offsite subsurface excavation that exceeds five (5) feet in depth below the pre-grade surface. Selection of the paleontologist shall be subject to approval of the City of Perris Planning Manager and no grading activities shall occur at the site or within offsite Project improvement areas until the paleontologist has been approved by the City.</p> <p>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.</p> <p>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.</p> <p>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</p>	Prior to issuance of grading permits  Ongoing monitoring during subsurface excavation	Confirmation of professional paleontologist retention/ ongoing monitoring/ submittal of Report of Findings	City of Perris Planning Division			

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	Division, will signify completion of the program to mitigate impacts to paleontological resources.						
<b>Greenhouse Gas Emissions</b>							
Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	<b>Applicable PVCCSP Mitigation Measures</b> Refer to previously referenced mitigation measures <b>MM Air 4, MM Air 5, MM Air 6, MM Air 7, MM Air 11, MM Air 13, MM Air 14, MM Air 18, MM Air 19, and MM Air 20.</b>						
	<b>MM 8-1</b> Prior to the issuance of each building permit, the Project Applicant 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.	Prior to issuance of building permit	Plans and specifications sent to the City of Perris Building Department	City of Perris Building Department			
	<b>MM 8-2</b> All landscaping equipment (e.g., leaf blower) used for property management shall be electric-powered only. The property manager/facility owner shall provide documentation (e.g., purchase, rental, and/or services agreement) to the City of Perris Building Department to verify, to the City's satisfaction, that all landscaping equipment utilized will be electric-powered.	Prior to issuance of certificate of occupancy and periodically after development	Documentation to be provided to the City of Perris Building Department	City of Perris Building Department			
	<b>MM 8-3</b> Once constructed, the Project Applicant 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 California Air Resources Board (CARB) 2010 standards for on-road vehicles or CARB Tier 4 compliant for off-road vehicles.	Prior to issuance of certificate of occupancy and periodically after development	Documentation to be provided to the City of Perris Building Department	City of Perris Building Department			
	<b>MM 8-4</b> 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	Prior to issuance of certificate of occupancy and periodically after development	Annual report to be provided to the City of Perris Planning Division	City of Perris Planning Division			

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	<p>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.</p>						
	<p><b>MM 8-5</b> Tenants who employ 250 or more employees on a full- or part-time basis shall comply with South Coast AQMD 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 South Coast AQMD 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:</p> <ul style="list-style-type: none"> <li>• Appoint a Transportation Demand Management (TDM) coordinator who would promote the TDM program, activities and features to all employees.</li> <li>• Create and maintain a “commuter club” to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work.</li> <li>• Inform employees of public transit and commuting services available to them (e.g., social media, signage).</li> <li>• Provide on-site transit pass sales and discounted transit passes.</li> <li>• Guarantee a ride home.</li> <li>• Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted.</li> <li>• Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.</li> <li>• Implement a commute trip reduction (CTR) program to provide employees assistance in using alternative modes of travel and provide incentives to encourage employee usage. The CTR program would be a multi-</li> </ul>	<p>Prior to issuance of certificate of occupancy and periodically after development</p>	<p>Documentation to be provided to the City of Perris Planning Division</p>	<p>City of Perris Planning Division</p>			

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	strategy program that could include the following individual measures: <ul style="list-style-type: none"> <li>o Carpooling encouragement</li> <li>o Ride-matching assistance</li> <li>o Preferential carpool parking</li> <li>o Flexible work schedules for carpools</li> <li>o Half-time transportation coordinator</li> <li>o New employee orientation of trip reduction and alternative travel mode options</li> <li>o Vanpool assistance</li> <li>o Bicycle end-trip facilities (parking and lockers)</li> </ul>						
	<b>MM 8-6</b> Prior to the issuance of a building permit, the Project Applicant shall provide evidence to the City of Perris Building Division that loading docks are designed to be compatible with SmartWay trucks.	Prior to issuance of building permit	Documentation to be provided to City of Perris Building Department	City of Perris Building Department			
	<b>MM 8-7</b> 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: <ul style="list-style-type: none"> <li>• Building energy efficiency, solid waste reduction, recycling, and water conservation.</li> <li>• Vehicle GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting.</li> <li>• Participation in the Voluntary Interindustry Commerce Solutions (VICS) "Empty Miles" program to improve goods trucking efficiencies.</li> <li>• Health effects of diesel particulates, State regulations limiting truck idling time, and the benefits of minimized idling.</li> <li>• The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity.</li> </ul>	Prior to issuance of certificate of occupancy and periodically after development	Documentation to be provided to City of Perris Planning Division	City of Perris Planning Division			
	<b>MM 8-8</b> Prior to issuance of a building permit, the Project Applicant shall provide the City of Perris Building Division 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	Prior to issuance of building permit	Documentation to be provided to City of Perris Building Department	City of Perris Building Department			

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	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.						
	<p><b>MM 8-9</b> The buildings shall be constructed as certified LEED Silver Level and implement the following, voluntary provisions of the California Green Building Standards Code (CALGreen). The project applicant/developer(s) shall provide documentation (e.g., building plans) of implementation of the applicable voluntary measures to the City of Perris Building Department prior to the issuance of building permits.</p> <ul style="list-style-type: none"> <li>Design the proposed parking areas to provide parking for low-emitting, fuel-efficient, and carpool/van vehicles. At minimum, the number of preferential parking spaces shall equal the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards Code, Section A5.106.5.1.2.</li> <li>Include solar panels to offset the office energy use.</li> <li>Design the proposed parking areas to provide electric vehicle (EV) charging stations. At minimum, the number of EV charging stations shall equal the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards Code, Section A5.106.5.3.2.</li> </ul>	Prior to issuance of building permit	Documentation to be provided to City of Perris Building Department	City of Perris Building Department			
<b>Hazards and Hazardous Materials</b>							
	<b>Applicable PVCCSP Mitigation Measures</b>						
Create a hazard through reasonably foreseeable upset and accident conditions.	<p><b>MM Haz 7</b> Prior to any excavation or soil removal action on a known contaminated site, or if contaminated soil or groundwater (i.e., with a visible sheen or detectable odor) is encountered, complete characterization of the soil and/or groundwater shall be conducted. Appropriate sampling shall be conducted prior to disposal of the excavated soil. If the soil is contaminated, it shall be properly disposed of, according to Land Disposal restrictions. If site remediation involves the removal of contamination, then contaminated material will need to be transported off site to a licensed hazardous waste disposal facility. If any implementing development projects require imported soils, proper sampling shall be conducted to make sure that the imported soil is free of contamination.</p>	During construction	Submittal of soil characterization information  Evidence that remediation has been completed	City of Perris Building Department			
	<b>Applicable PVCCSP Mitigation Measures</b>						
For a project located within an airport land use plan or, where such a plan has not	<p><b>MM Haz 2</b> Prior to the recordation of a final map, issuance of a building permit, or conveyance to an entity exempt from the</p>	Prior to the earliest of	Confirmation of conveyance of	City of Perris			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
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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.	Subdivision Map Act, whichever occurs first, the landowner shall convey an avigation easement to the MARB/March Inland Port Airport Authority.	recording of a final map, issuance of a building permit, or conveyance to an entity exempt from the Subdivision Map Act	avigation easement provided	Planning Division			
	<b>MM Haz 3</b> 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.	During plot plan/architectural plan review	Review and approval of site lighting plans	City of Perris Planning Division			
	<b>MM Haz 4</b> 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)."	Prior to certificate of occupancy for buildings and tenant improvements	Confirmation that purchasers and tenants have been provided the required notice	City of Perris Planning Division			
	<b>MM Haz 5</b> 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.	During plot plan/architectural plan review	Approved plan  Confirmation that prohibited uses and actions are included in executed lease agreements	City of Perris Planning Division			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
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	e. All retention and water quality basins shall be designed to dewater within 48 hours of a rainfall event.						
	<b>MM Haz 6</b> 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 Division in order to determine whether any implementing project-related vertical structures or construction equipment would encroach into the 100-to-1 imaginary surface surrounding the MARB. If it is determined that there would 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 would work with FAA to resolve any adverse effects on aeronautical operations.	A minimum of 45-day prior to submittal of an application for a building permit	Evidence that FAA Form 7460-1 has been filed for construction equipment, if needed	City of Perris Planning Division			
Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	<p><b>Applicable PVCCSP Mitigation Measures</b></p> <p>Refer to previously referenced mitigation measure <b>MM Air 2</b>.</p>						
<b>Hydrology and Water Quality</b>							
	<b>Applicable Standard Regulatory Requirements</b>						
Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality	<b>RR 10-1</b> Prior to grading plan approval and the issuance of a grading permit, the Project proponent shall provide evidence to the City that a Notice of Intent (NOI) has been filed with the Regional Water Quality Control Board for coverage under the State National Pollutant Discharge Elimination System (NPDES) General Construction Permit for discharge of storm water associated with construction activities.	Prior to approval of grading plan and issuance of grading permits	Evidence that a NOI has been filed with Regional Water Quality Control Board and grading plan approval	City of Perris City Engineer			
	<b>RR 10-2</b> Prior to grading plan approval and the issuance of a grading permit by the City, the Project proponent shall submit to the City of Perris a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP shall include a surface water control plan and erosion-control plan citing specific measures to control on- and off-site erosion during the entire grading and construction period. Additionally, the SWPPP shall identify	Prior to approval of grading plan and issuance of grading permits	Submittal of SWPPP and grading plan approval	City of Perris City Engineer			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
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	<p>structural and non-structural Best Management Practices (BMPs) to control sediment and nonvisible discharges from the site. BMPs to be implemented in the SWPPP may include (but shall not be limited to) the following:</p> <ul style="list-style-type: none"> <li>• Sediment discharges from the site may be controlled by the following: sandbags; silt fences; straw wattles and temporary debris basins (if deemed necessary); and other discharge control devices. The construction and condition of the BMPs will be periodically inspected during construction, and repairs will be made when necessary as required by the SWPPP.</li> <li>• No materials of any kind shall be placed in drainage ways.</li> <li>• Materials that could contribute nonvisible pollutants to storm water must be contained, elevated, and placed in temporary storage containment areas.</li> <li>• All loose piles of soil, silt, clay, sand, debris, and other earthen material shall be protected per Regional Board standards to eliminate any discharge from the site. Stockpiles will be surrounded by silt fences.</li> <li>• The SWPPP will include inspection forms for routine monitoring of the site during the construction phase to ensure NPDES compliance.</li> <li>• Additional BMPs and erosion-control measures will be documented in the SWPPP and utilized if necessary.</li> <li>• The SWPPP will be kept on site for the entire duration of project construction and will also be available to the local RWQCB for inspection at any time.</li> </ul> <p>In the event that it is not feasible to implement the above BMPs, the City of Perris can make a determination that other BMPs will provide equivalent or superior treatment either on or off site.</p>						
	<p><b>RR 10-3</b> Prior to issuance of grading permits, the Project proponent shall provide evidence to the City that the following provisions have been added to construction contracts for the Project:</p> <ul style="list-style-type: none"> <li>• The Construction Contractor shall be responsible for performing and documenting the application of BMPs identified in the SWPPP. Weekly inspections shall be performed on sediment-control measures called for in the SWPPP. Monthly reports shall be maintained by the Contractor and submitted to the City for inspection. In addition, the Contractor will also be required to maintain an inspection log and have the log on site to be reviewed</li> </ul>	Prior or issuance of grading permits	Inclusion of BMPs performance and documentation requirement in contractor specifications	City of Perris City Engineer			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
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	by the City of Perris and the representatives of the Regional Water Quality Control Board.						
	<b>RR 10-4</b> Prior to grading plan approval and issuance of a grading permit by the City, the Project proponent shall receive approval from the City of Perris for a Final Water Quality Management Plan (Final WQMP) for each site plan. The Final WQMP shall specifically identify pollution-prevention, site-design, source-control, and treatment-control BMPs that shall be used on site to control predictable pollutant runoff in order to reduce impacts to water quality to the maximum extent practicable. In the event that it is not feasible to implement the BMPs identified in the Final WQMP, the City of Perris can make a determination that other BMPs shall provide equivalent or superior treatment either on or off site.	Prior to approval of grading plan and issuance of grading permits	Review and approval of Final WQMP	City of Perris City Engineer			
<b>Noise</b>							
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>Applicable PVCCSP Mitigation Measures</b>						
	<b>MM Noise 1</b> During all project site excavation and grading on-site, the construction contractors shall equip all construction equipment, fixed or mobile, shall be equipped with 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	During excavation and grading	Confirmation that this requirement is included in Contractor Specifications  Periodic inspection reports	City of Perris Building Department			
	<b>MM Noise 2</b> During construction, stationary construction equipment, stockpiling and vehicle staging areas will be placed a minimum of 446 feet away from the closet sensitive receptor.	Stockpile and staging area identified during development application/ plot plan approval process  During construction approved stockpile and staging area used	Confirmation that these requirements are included in Contractor Specifications Review and approval of grading plans with designated stockpile and staging areas  Periodic inspection reports	City of Perris Building Department			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
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	<p><b>MM Noise 3</b> 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.</p>	During construction	<p>Confirmation that this requirement is included in Contractor Specifications</p> <p>Periodic inspection reports</p>	City of Perris Building Department			
	<p><b>MM Noise 4</b> 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.</p>	During construction	<p>Confirmation that this requirement is included in Contractor Specifications</p> <p>Periodic inspection reports</p>	City of Perris Building Department			
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 expose people residing or working in the project area to excessive noise levels	<p><b>Applicable PVCCSP EIR Mitigation Measures</b></p> <p>Refer to previously referenced mitigation measure <b>MM Haz 4</b>.</p>						
<b>Transportation</b>							
Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	<b>Applicable PVCCSP Mitigation Measures</b>						
	<p><b>MM Trans 3</b> 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 includes 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.</p>	Prior to issuance of a building permit	Confirmation that the applicant has paid the required fees	City of Perris Planning & Engineering Department			
	<p><b>MM Trans 4</b> Prior to the approval of individual implementing development projects, the Riverside Transit Agency (RTA) shall be contacted to determine if the RTA has plans for the future</p>	<b>Mitigation measure completed with preparation of the Draft EIR; refer to PDF 13-3.</b>					

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
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	provision of bus routing in the project area that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that 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.						
	<b>MM Trans 5</b> Bike racks shall be installed in all parking lots in compliance with City of Perris standards.	Prior to issuance of certificate of occupancy	Bike racks installed per City standards	City of Perris Building Department			
	<b>MM Trans 6</b> Each implementing development project that is located adjacent to the MWD Trail shall coordinate with the City of Perris Parks and Recreation Department to determine the development plan for the trail.	Development review process	Coordination with City of Perris Parks and Recreation Department	City of Perris Parks and Recreation Department			
	<b>MM Trans 8</b> Proposed mitigation measures resulting from project-level traffic impact 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.	Development review process	Confirmation of credit agreement	City of Perris Planning & Engineering Department			
	<b>Applicable PVCCSP Mitigation Measures</b>						
Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	<b>MM Trans 1</b> 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	During construction	City acceptance of constructed roadways	City of Perris Planning & Engineering Department			
	<b>MM Trans 2</b> 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.	During review of final grading, landscape and street improvement plans	Review and approval of final grading, landscape, and street improvement plans	City of Perris Planning & Engineering Department			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
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	<b>Project Design Features</b>						
	<p><b>PDF 14-1</b> Prior to the issuance of occupancy permits, the Project proponent shall have constructed the roadway improvements outlined below. These roadways shall be improved consistent with the PVCCSP and the City of Perris General Plan's Circulation Element. The Project shall improve these roadways as required by the final Conditions of Approval or the proposed Project and applicable City of Perris standards.</p> <ul style="list-style-type: none"> <li>• Construct Natwar Lane at its ultimate half-section pavement width as a Collector (64-foot right-of-way) between the Project's northern and southern boundaries.</li> <li>• Construct Western Way as its ultimate full-section pavement width as a Secondary Arterial (94-foot right-of-way) between the Project's northern and southern boundaries</li> </ul>	Prior to issuance of certificate of occupancy	Confirmation that the roadway improvements have been installed	City of Perris Planning & Engineering Department			
	<p><b>PDF 14-2</b> Prior to the issuance of occupancy permits, the Project proponent shall have constructed the site adjacent access improvements outlined below, consistent with the PVCCSP and the City of Perris General Plan's Circulation Element. The proposed Project shall improve these roadways as required by the final Conditions of Approval for the proposed Project and applicable City of Perris standards.</p> <ul style="list-style-type: none"> <li>• Natwar Lane/Driveway 3 &amp; Driveway 1 – Install a stop control on the eastbound and southbound approach, and construct the intersection with the following geometrics:                             <ul style="list-style-type: none"> <li>○ Northbound Approach: One shared left-through lane.</li> <li>○ Southbound Approach (Project Driveway 3): One shared through-right turn lane.</li> <li>○ Eastbound Approach (Project Driveway 1): One shared left-right turn lane.</li> <li>○ Westbound Approach: N/A</li> </ul> </li> <li>• Natwar Lane &amp; Driveway 2 – Install a stop control on the eastbound approach and construct the intersection with the following geometrics:                             <ul style="list-style-type: none"> <li>○ Northbound Approach: One through lane.</li> <li>○ Southbound Approach: One shared through-right turn lane.</li> <li>○ Eastbound Approach (Project Driveway 2): One right turn lane.</li> <li>○ Westbound Approach: N/A</li> </ul> </li> </ul>	Prior to issuance of certificate of occupancy	Confirmation that the site access improvements have been made	City of Perris Planning & Engineering Department			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
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	<ul style="list-style-type: none"> <li>Western Way &amp; Driveway 4 – Install a stop control on the eastbound approach and construct the intersection with the following geometrics:                             <ul style="list-style-type: none"> <li>Northbound Approach: One through lane.</li> <li>Southbound Approach: One shared through-right turn lane.</li> <li>Eastbound Approach (Project Driveway 4): One right turn lane.</li> <li>Westbound Approach: N/A</li> </ul> </li> </ul> <p>On-site traffic signing and striping should be implemented agreeable with the provision of the California Manual on Uniform Traffic Control Devices (CA MUTCD) in conjunction with detailed construction plans for the Project site. Sight distance at each Project access point shall be reviewed with respect to City of Perris and PVCCSP sight distance standards at the time of preparation of final grading, landscape, and street improvement plans.</p>						
	<p><b>PDF 14-3</b> Prior to the issuance of occupancy permits, the Project proponent shall construct the truck access roadway improvements to provide the necessary curb radii to accommodate a truck with a 67-foot wheelbase as provided on the approved site plan.</p> <ul style="list-style-type: none"> <li></li> </ul>	Prior to issuance of certificate of occupancy	Confirmation that site access improvements have been made	City of Perris Planning & Engineering Department			
Be inconsistent or conflict with CEQA Guidelines Section 15064.3 subdivision (b).	<p><b>Additional Project-Level Mitigation Measures</b></p> <p><b>MM 14-1</b> Future tenants shall implement a commute trip reduction (CTR) program to provide employees assistance in using alternative modes of travel and provide incentives to encourage employee usage. The CTR program shall be included in all leasing agreements. The CTR program would be a multi-strategy program that could include the following individual measures:</p> <ul style="list-style-type: none"> <li>Carpooling encouragement</li> <li>Ride-matching assistance</li> <li>Preferential carpool parking</li> <li>Flexible work schedules for carpools</li> <li>Half-time transportation coordinator</li> <li>New employee orientation of trip reduction and alternative travel mode options</li> <li>Vanpool assistance</li> <li>Bicycle end-trip facilities (parking and lockers)</li> </ul>	Prior to issuance of certificate of occupancy	Confirmation that CTR program has been implemented	City of Perris Planning Division			

Impact/Threshold	Applicable PVCCSP Mitigation Measures, Additional Project-Specific Project Design Features, or Additional Project-Level Mitigation Measures	Monitoring Timing/Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
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	The Project will require 4.68% VMT reduction to mitigate the Project's potential impacts. Transportation demand management (TDM) strategies have been evaluated for the purpose of reducing VMT. The purpose of TDM strategies is to reduce the need for single occupancy automobile trips. The effectiveness of TDM strategies available to individual land use projects was thoroughly evaluated by the Quantifying Greenhouse Gas Mitigation Measures. The City Guidelines also provide a list of the transportation measures as identified by California Air Pollution Control Officers Association (CAPCOA). TDM strategies in the context of the Project are shown in Table 4.14-3, TDM Strategies.						
<b>Tribal Cultural Resources</b>							
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.	<p><b>Additional Project-Level Mitigation Measures</b></p> <p>Previously referenced mitigation measures <b>MM 5-1</b> and <b>MM 5-2</b></p>						

**Attachment A**  
**Updated Traffic Impact Analysis**



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# First March Logistics (DPR20-00004)

**TRAFFIC ANALYSIS  
CITY OF PERRIS**

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**LIST OF ABBREVIATED TERMS**

(1)	Reference
ADT	Average Daily Traffic
CA MUTCD	California Manual on Uniform Traffic Control Devices
Caltrans	California Department of Transportation
CMP	Congestion Management Program
DIF	Development Impact Fee
E+P	Existing Plus Project
EAC	Existing plus Ambient Growth plus Cumulative
EAPC	Existing plus Ambient Growth plus Project plus Cumulative
HCM	Highway Capacity Manual
ITE	Institute of Transportation Engineers
LOS	Level of Service
N/A	Not Applicable
NPRBBD	North Perris Road and Bridge Benefit District
PCE	Passenger Car Equivalents
PHF	Peak Hour Factor
Project	First March Logistics
PVCC SP	Perris Valley Commerce Center Specific Plan
RTA	Riverside Transit Authority
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
sf	Square Feet
TA	Traffic Analysis
TSF	Thousand Square Feet
TUMF	Transportation Uniform Mitigation Fee
WRCOG	Western Riverside Council of Governments
V/C	Volume to Capacity

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# 1 INTRODUCTION

This report presents the results of the focused traffic analysis (TA) for the proposed First March Logistics development (“Project”), which is located north of Nandina Avenue and west of Natwar Lane, within the City of Perris’ *Perris Valley Commerce Center Specific Plan (PVCC SP)* as shown on Exhibit 1-1.

The purpose of this traffic analysis is to evaluate the potential deficiencies related to traffic and circulation system operations that may result from the development of the proposed Project, and to recommend improvements to mitigate potential deficiencies in order to achieve acceptable circulation system operational conditions. This report has been prepared in accordance with the approved Project Traffic Study Scoping agreement through consultation with City of Perris staff, which is provided in Appendix 1.1 of this report. The scoping agreement provides an outline of the Project study area, trip generation, trip distribution, and analysis methodology.

The PVCC SP Environmental Impact Report (EIR) concluded that the potential deficiencies related to level of service on study area roadways were less than significant. The PVCC SP EIR did not evaluate peak hour operations of any key study area intersections. (1)

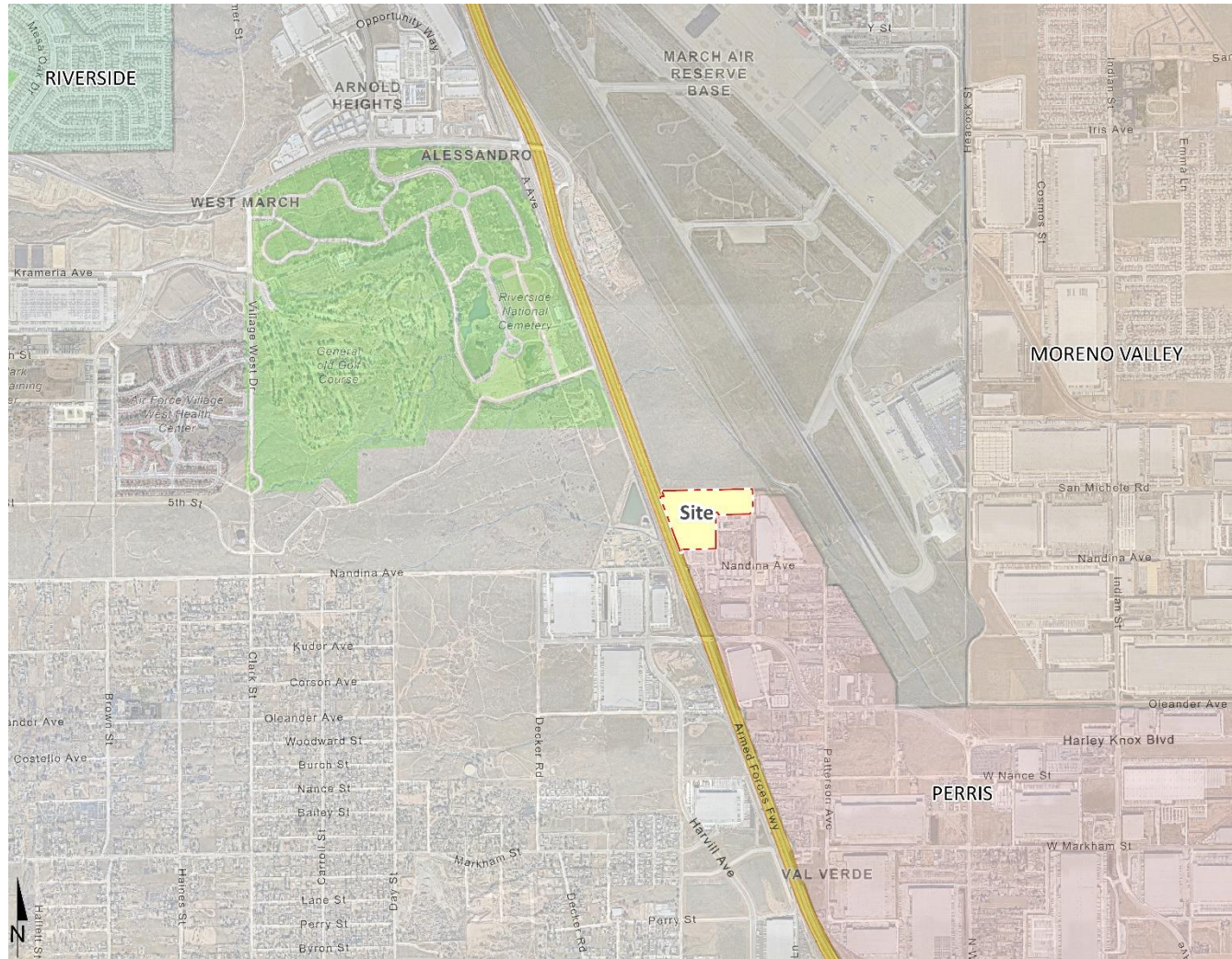
## 1.1 SUMMARY OF FINDINGS

The Project is proposing to construct the following improvements as design features in conjunction with development of the site:

- Project to construct Natwar Lane at its ultimate half-section pavement width as a Collector (64-foot right-of-way) between the Project’s northern and southern boundaries consistent with the PVCC SP and the City of Perris General Plan Circulation Element.
- Project to construct Driveway 1 and Driveway 2 on Natwar Lane with stop controls for the eastbound traffic in order to facilitate site access (Phase 1).
- Project to construct Driveway 3 on Natwar Lane with stop controls for the southbound traffic in order to facilitate site access (Phase 2).
- Project to construct Driveway 4 on Western Way with stop controls for the eastbound traffic in order to facilitate site access (Phase 2).

Additional details and intersection lane geometrics are provided in Section 1.7 *On-Site Roadway Improvements* and Section 1.8 *Site Access Improvements* of this report.

EXHIBIT 1-1: LOCATION MAP



## 1.2 PROJECT OVERVIEW

The Project is proposed to consist of a single 419,034 square foot (sf) warehouse building (Building 1) and a second 139,971 sf warehouse building (Building 2). However, for the purposes of this traffic study, the building size evaluated for Building 1 will assume up to 450,000 sf. Building 1 is anticipated to be constructed by the year 2023 while Project Buildout is anticipated by year 2025. The proposed Project land use is consistent with the PVCC SP, which is Light Industrial. Vehicular and truck traffic access will be provided via the following driveways (see Exhibit 1-2):

- Natwar Ln./Driveway 3 & Driveway 1 – full access at for trucks only at Driveway 1; right-in access only for trucks at Driveway 3; full access for passenger cars at Driveway 3
- Natwar Ln. & Driveway 2 – full access for both passenger cars and trucks
- Western Wy. & Driveway 4 – full access for passenger cars; right-out access only for trucks

Regional access to the Project site is provided via the I-215 Freeway and Harley Knox Boulevard Interchange.

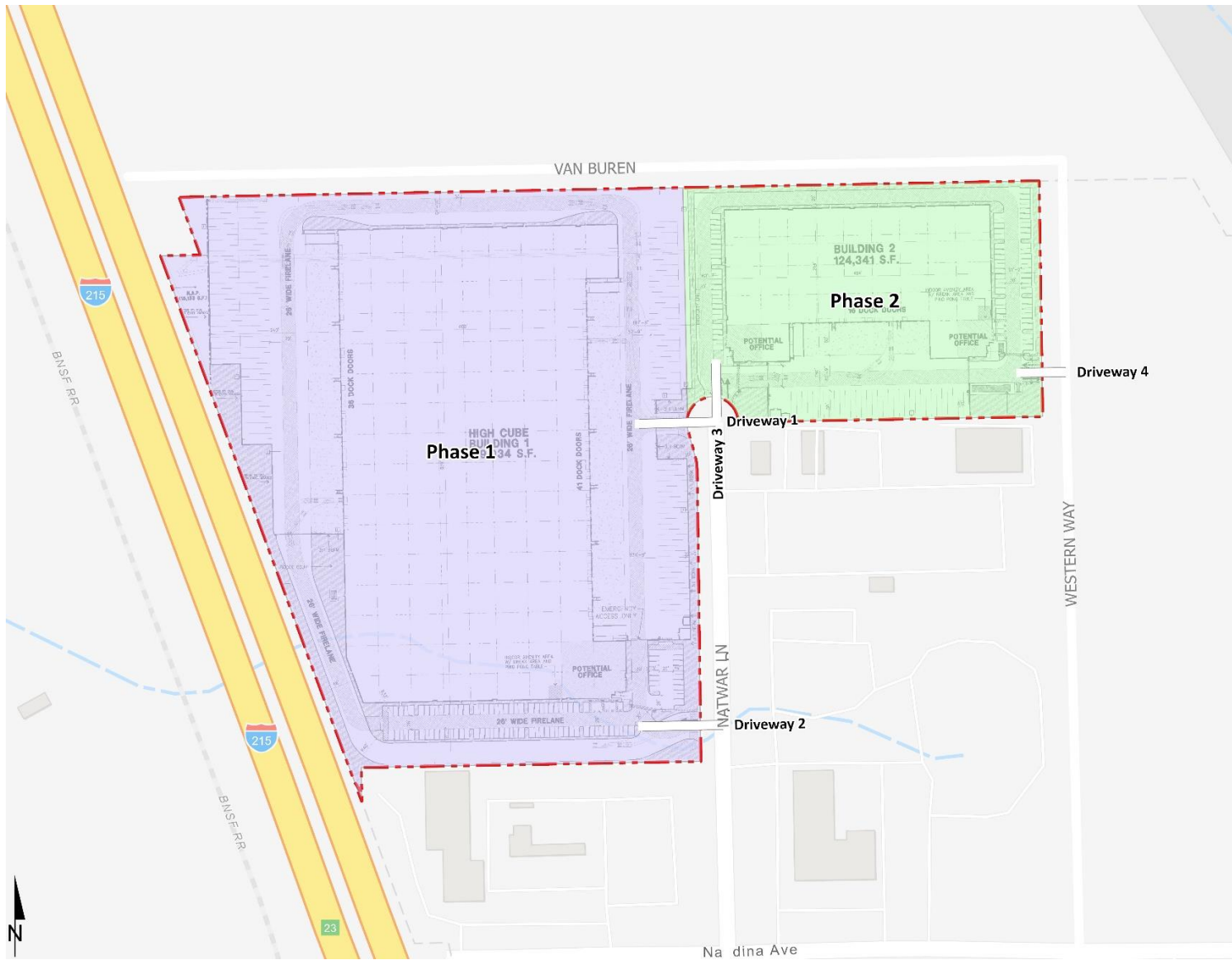
Trips generated by the Project's proposed land uses have been estimated based on trip generation rates collected by the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10<sup>th</sup> Edition, 2017. (2) The Project is anticipated to generate 1,390 two-way trips per day, with 127 AM peak hour trips and 152 PM peak hour trips (actual vehicles). The assumptions and methods used to estimate the Project's trip generation characteristics are discussed in greater detail in Section 4.1 *Project Trip Generation* of this report.

## 1.3 ANALYSIS SCENARIOS

For the purposes of this traffic study, potential deficiencies to traffic and circulation have been assessed for each of the following conditions:

- Existing (2021)
- Existing Plus Project (E+P) – Phase 1
- E+P – Project Buildout (Phase 1 + Phase 2)
- Existing Plus Ambient Growth Plus Cumulative (E+A+C) (2023)
- Existing Plus Ambient Growth Plus Project (Phase 1) Plus Cumulative (E+A+P+C) (2023)
- Existing Plus Ambient Growth Plus Cumulative (E+A+C) (2025)
- Existing Plus Ambient Growth Plus Project Buildout Plus Cumulative (E+A+P+C) (2025)

EXHIBIT 1-2: PRELIMINARY SITE PLAN



### 1.3.1 EXISTING (2021) CONDITIONS

Information for Existing (2021) conditions is disclosed to represent the baseline traffic conditions as they existed at the time this report was prepared. Traffic counts were conducted in March 2019, when local schools were in session and operating on a typical bell schedule (prior to closures related to the COVID-19 pandemic). Based on vehicle classification, vehicles converted to passenger-car-equivalent (PCE) due to the presence of heavy trucks within the study area.

### 1.3.2 EXISTING PLUS PROJECT CONDITIONS

The Existing Plus Project (E+P) analysis determines any significant traffic operation and circulation system deficiencies that would occur on the existing roadway system in the scenario of the Project being placed upon Existing conditions. For the purposes of this analysis, the E+P analysis scenario has been evaluated for both Phase 1 and Project Buildout to understand the deficiencies that are specific to each phase of the development.

### 1.3.3 EXISTING PLUS AMBIENT GROWTH PLUS PROJECT PLUS CUMULATIVE (2023) CONDITIONS

To account for growth in traffic between Existing (2021) conditions and the Project Opening Year (2023, Phase 1), a traffic growth rate of 6.09% was assumed. The 3.0 percent annual growth rate (compounded annually, over two years) is intended to capture non-specific ambient traffic growth. Conservatively, the TA estimates of area traffic growth then add traffic generated by other known or probable related projects. These related projects are at least in part already accounted for in the assumed 6.09% total ambient growth in traffic noted above; and in some instances, these related projects would likely not be implemented and operational within the 2023 Opening Year time frame assumed for the Project. The resulting traffic growth rate utilized in the TA (6.09% ambient growth + traffic generated by related projects) would therefore tend to overstate rather than understate background cumulative traffic deficiencies under 2023 conditions. Phase 1 traffic was added to evaluate EAPC (2023) traffic conditions.

### 1.3.4 EXISTING PLUS AMBIENT GROWTH PLUS PROJECT PLUS CUMULATIVE (2025) CONDITIONS

To account for growth in traffic between Existing (2021) conditions and the Project Opening Year (2025, Project Buildout), a traffic growth rate of 12.55% was assumed. The 3.0 percent annual growth rate (compounded annually, over 4 years) is intended to capture non-specific ambient traffic growth. Conservatively, the TA estimates of area traffic growth then add traffic generated by other known or probable related projects. These related projects are at least in part already accounted for in the assumed 12.55% total ambient growth in traffic noted above; and in some instances, these related projects would likely not be implemented and operational within the 2025 Opening Year time frame assumed for the Project. The resulting traffic growth rate utilized in the TA (12.55% ambient growth + traffic generated by related projects) would therefore tend to overstate rather than understate background cumulative traffic deficiencies under 2025 conditions. Project Buildout traffic was added to evaluate EAPC (2025) traffic conditions.

The EAPC (2025) conditions analyses will be utilized to determine if improvements funded through regional transportation mitigation fee programs, such as the Western Riverside Council of Governments (WRCOG) Transportation Uniform Mitigation Fee (TUMF) and Development

Impact Fee (DIF) programs, can accommodate the long-range cumulative traffic at the target level of service (LOS) identified in the City of Perris (lead agency) General Plan. (3) Each of these regional transportation fee programs are discussed in more detail in Section 8 *Local and Regional Funding Mechanisms*.

**1.4 STUDY AREA**

To ensure that this TA satisfies the City of Perris’ traffic study requirements, Urban Crossroads, Inc. prepared a Project traffic study scoping package for review by City of Perris staff prior to the preparation of this report.

**1.4.1 INTERSECTIONS**

The 8 study area intersections shown on Exhibit 1-3 and listed in Table 1-1 were selected for this TA based on the City’s Traffic Study Guidelines and in consultation with City of Perris staff. The City requires analysis of intersections where the Project would contribute 50 or more peak hour trips. Based on the location of the Project site and the trip distribution patterns, the Project is anticipated to contribute 50 peak hour trips to all major study area intersections and to the State Highway System. The Project trip generation, distribution, and volumes are further explained in Chapter 4 *Project Future Traffic* of this TA.

**TABLE 1-1: INTERSECTION ANALYSIS LOCATIONS**

ID	Intersection Location	Jurisdiction	CMP?
1	I-215 SB Ramps & Harley Knox Bl.	City of Perris	No
2	I-215 NB Ramps & Harley Knox Bl.	City of Perris	No
3	Natwar Ln./Driveway 3 & Driveway 1	City of Perris	No
4	Natwar Ln. & Driveway 2	City of Perris	No
5	Natwar Ln. & Nandina Av.	City of Perris	No
6	Western Wy. & Driveway 4	City of Perris	No
7	Western Wy. & Nandina Av.	City of Perris	No
8	Western Wy. & Harvey Knox Bl.	City of Perris	No

\* Note: CMP = Congestion Management Program

The intent of a Congestion Management Program (CMP) is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related deficiencies, and improve air quality. Counties within California have developed CMPs with varying methods and strategies to meet the intent of the CMP legislation. None of the study area intersections are identified as CMP facilities in the County of Riverside CMP. (4)

EXHIBIT 1-3: STUDY AREA



## 1.5 DEFICIENCIES

This section provides a summary of deficiencies by analysis scenario. Section 2 *Methodologies* provides information on the methodologies used in the analysis and Section 6 *EAC and EAPC (2023) Traffic Conditions* and Section 7 *EAC and EAPC (2025) Traffic Conditions* includes the detailed analysis. A summary of LOS results for all analysis scenarios is presented on Table 1-2.

### 1.5.1 EXISTING AND E+P CONDITIONS

Although not needed to address any LOS deficiency, restriping has been recommended at the I-215 Southbound Ramps at Harley Knox Boulevard in order to address existing queuing issues. Field observations of the I-215 Freeway interchange at Harley Knox Boulevard indicate that there are queues during the peak hours. The interchange is included in both the TUMF and NPRBBD fee programs and the Project will participate in contributing towards the I-215/Harley Knox Boulevard interchange improvements through payment of TUMF/NPRBBD fees.

### 1.5.3 EAPC (2023) CONDITIONS

The following study area intersection is anticipated to operate at a deficient LOS (i.e., LOS E or worse) for Background (2023) traffic conditions:

- I-215 SB Ramps & Harley Knox Bl. (#1) – LOS F PM peak hour only
- I-215 NB Ramps & Harley Knox Bl. (#2) – LOS F AM and PM peak hours

### 1.5.4 EAPC (2025) CONDITIONS

The following study area intersection is anticipated to operate at a deficient LOS (i.e., LOS E or worse) for Background (2025) traffic conditions:

- I-215 SB Ramps & Harley Knox Bl. (#1) – LOS F AM and PM peak hours
- I-215 NB Ramps & Harley Knox Bl. (#2) – LOS F AM and PM peak hours

## 1.6 RECOMMENDATIONS

This section provides a summary of deficiencies and recommended improvements. Section 2 *Methodologies* provides information on the methodologies used in the analyses and Section 5 *E+P Traffic Conditions*, Section 6 *EAC and EAPC (2023) Traffic Conditions*, and Section 7 *EAC and EAPC (2025) Traffic Conditions* include the detailed analyses. The same study area intersection deficiencies occur without and with Project traffic for all analysis scenarios (see Table 1-2). As such, there are no project-related deficiencies, however, the Project would cumulatively contribute to each of the deficiencies identified on Table 1-2. Each project implementing the PVCC SP is required to incorporate applicable mitigation from the PVCC Specific Plan EIR. The relevant traffic mitigation measures from the PVCC Specific Plan EIR are identified in Section 1.5.1.

### 1.6.1 PVCC SPECIFIC PLAN EIR TRAFFIC MITIGATION MEASURES

**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 (Transportation Uniform Mitigation Fee), DIF (Development Impact Fee), and the NPRBBD (North Perris Road and Bridge Benefit District). The fees shall be collected and utilized as needed by the City of Perris to construct the improvements necessary to maintain the required level of service and build or improve roads to their build-out level.
- MM Trans 4** Prior to the approval of individual implementing development projects, the Riverside Transit Agency (RTA) shall be contacted to determine if the RTA has plans for the future provision of bus routing in the project area that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that 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 6** Each implementing development project that is located adjacent to the MWD Trail shall coordinate with the City of Perris Parks and Recreation Department to determine the development plan for the trail.
- 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 NPRBBB to ensure that they are in conformance with the ultimate improvements planned by the NPRBBB. The applicant shall be eligible to receive proportional credits against the NPRBBB for construction of project level mitigation that is included in the NPRBBB.

**TABLE 1-2: SUMMARY OF LOS BY ANALYSIS SCENARIO**

# Intersection	Existing		E+P (Phase 1)		E+P (Phase 2)		EAC (2023)		EAPC (2023)		EAC (2025)		EAPC (2025)	
	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
1 I-215 SB Ramps & Harley Knox Bl.	●	●	●	●	●	●	●	●	●	●	●	●	●	●
2 I-215 NB Ramps & Harley Knox Bl.	●	●	●	●	●	●	●	●	●	●	●	●	●	●
3 Natwar Ln./Driveway 3 & Driveway 1	N/A	N/A	●	●	●	●	N/A	N/A	●	●	N/A	N/A	●	●
4 Natwar Ln. & Driveway 2	N/A	N/A	●	●	●	●	N/A	N/A	●	●	N/A	N/A	●	●
5 Natwar Ln. & Nandina Av.	●	●	●	●	●	●	●	●	●	●	●	●	●	●
6 Western Wy. & Driveway 4	N/A	N/A	N/A	N/A	●	●	N/A	N/A	N/A	N/A	N/A	N/A	●	●
7 Western Wy. & Nandina Av.	●	●	●	●	●	●	●	●	●	●	●	●	●	●
8 Western Wy. & Harley Knox Bl.	●	●	●	●	●	●	●	●	●	●	●	●	●	●

● = A - D   ● = E   ● = F

**1.6.2 CIRCULATION SYSTEM DEFICIENCIES AND RECOMMENDED IMPROVEMENTS**

A summary of the operationally deficient study area intersections and recommended improvements required to achieve acceptable circulation system performance are described in detail within Section 3 *Area Conditions*, Section 5 *E+P Traffic Conditions*, Section 6 *EAC and EAPC (2023) Traffic Conditions*, and Section 7 *EAC and EAPC (2025) Traffic Conditions* of this report.

A summary of off-site improvements needed to address intersection operational deficiencies for each analysis scenario is included in Table 1-3. These recommended improvements are consistent with or less than the geometrics assumed in the City of Perris and County of Riverside General Plan Circulation Elements. Improvements found to be included in the Western Riverside Council of Governments (WRCOG) Transportation Uniform Mitigation Fee (TUMF) program, City of Perris’s (lead agency) Development Impact Fee (DIF) program, or North Perris Road and Bridge Benefit District (NPRBBB) have been identified as such. The NPRBBB includes additional improvements to supplement the TUMF and DIF network. NPRBBB fees are inclusive of TUMF and DIF.

**TABLE 1-3: SUMMARY OF IMPROVEMENTS BY ANALYSIS SCENARIO**

#	Intersection Location	Jurisdiction	Existing (2021)	Recommended Improvements				Improvements in DIF, TUMF, NPRBBD, etc. <sup>1,2</sup>	Project Responsibility	Project Fair Share <sup>3</sup>
				E+P (Ph. 1)	E+P (Ph. 1 & 2)	EAPC (2023)	EAPC (2025)			
1	I-215 SB Ramps & Harley Knox Bl.	Caltrans, County of Riverside	- Restripe to accommodate 2 WB left turn lanes and 1 WB through lane	- Same	- Same	- Same	- Same	Yes (TUMF, NPRBBD)	Fees	--
2	I-215 NB Ramps & Harley Knox Bl.	Caltrans, County of Riverside	- None	- None	- None	- WB free-right turn lane	- Same	Yes (TUMF, NPRBBD)	Fees	--
						- 2nd EB left turn lane	- Same	Yes (TUMF, NPRBBD)	Fees	

<sup>1</sup> Improvements included in TUMF Nexus, NPRBBD, or City of Perris DIF programs have been identified as such.

<sup>2</sup> Program improvements constructed by Project may be eligible for fee credit. In lieu fee payment is at discretion of City. Represents the fair share percentage for the Project during the most impacted peak hour.

<sup>3</sup> Total project fair share contribution consists of the improvements which are not already included in the City-wide DIF/NPRBBD/County TUMF for those intersections wholly or partially within the City of Perris.

## 1.7 ON-SITE ROADWAY IMPROVEMENTS

The recommended site-adjacent roadway improvements for the Project are described below. Exhibit 1-4 illustrates the site access recommendations.

**Natwar Lane** – Natwar Lane is a north-south oriented roadway located along the Project’s eastern boundary. Construct Natwar Lane at its ultimate half-section pavement width as a Collector (64-foot right-of-way) between the Project’s northern and southern boundaries consistent with the PVCC SP and the City of Perris General Plan Circulation Element. The Project shall install a 34-foot-wide asphalt paving (using a traffic index of 8.0 and performance grade of 64-10), 6-inch curb and gutter 22-feet west of the centerline, sidewalk and streetlights per the City of Perris, County of Riverside, and Caltrans standards. If the existing pavement is in good condition, the Project Applicant may use grind and overlay technique as determined by the City Engineer. A conceptual striping plan for Natwar Lane is shown on Exhibit 1-5. Note that the centerline along Natwar Lane is purposefully offset in order to accommodate the turning radius of heavy trucks off of and onto Natwar Lane.

Western Way is planned to be extended northerly and connect to a future extension of Van Buren Boulevard at the northerly City boundary. As such, the Project should improve Western Way accordingly to accommodate the future extension through its pan-handle section.

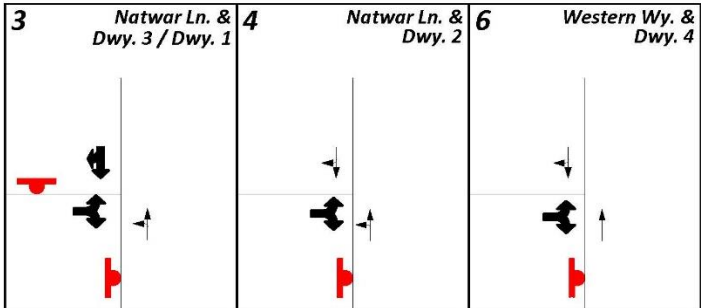
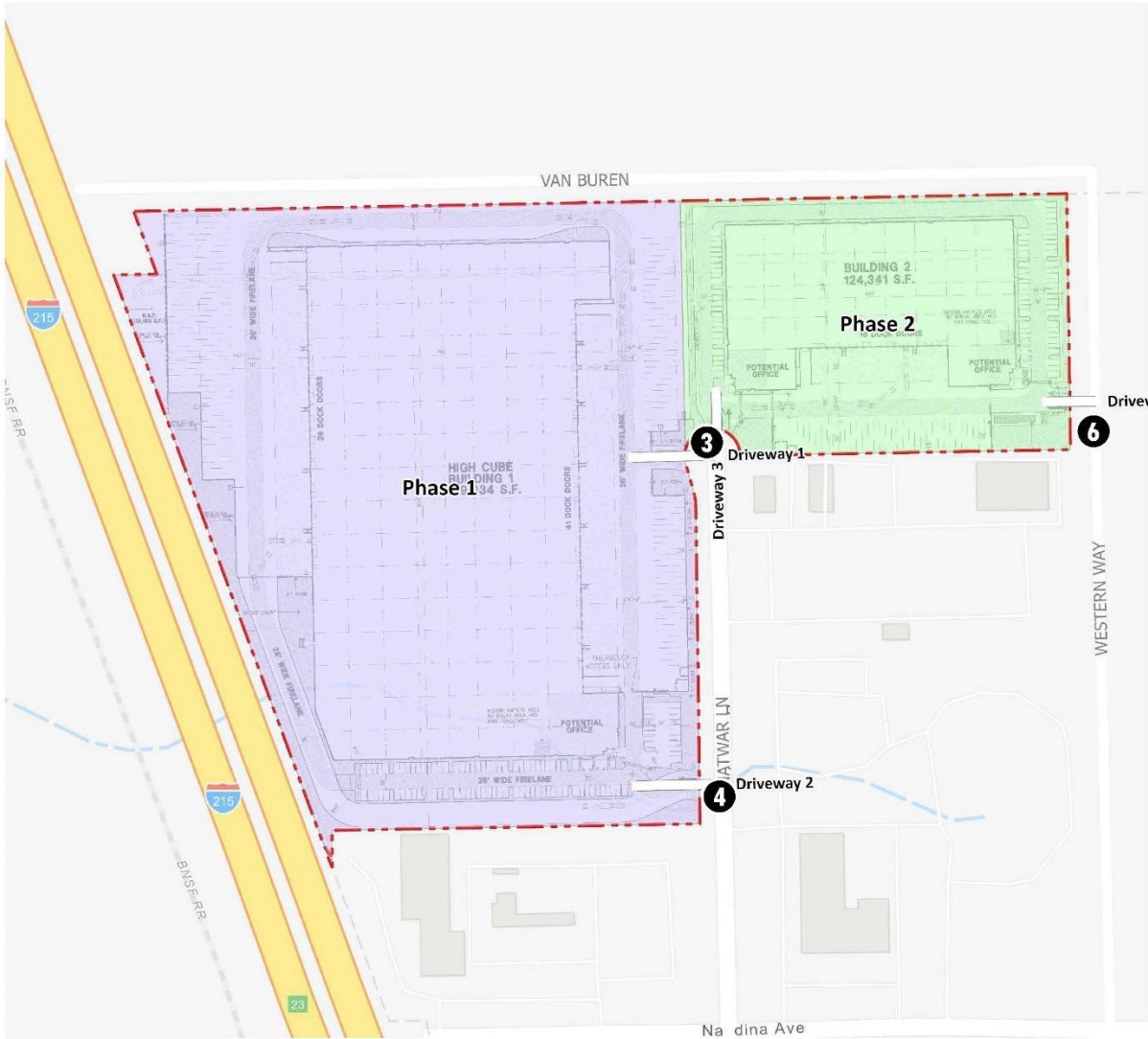
**Western Way** – Western Way is a north-south oriented roadway that will traverse along the eastern boundary of the project. Western Way is constructed at the ultimate full-section pavement width as a Secondary Arterial (94-foot right-of-way) between the Project’s northern and southern boundaries consistent with the PVCC SP and the City of Perris General Plan Circulation Element.

It is recommended that the Project Applicant coordinate with the March Joint Powers Authority with respect to the future proposed section of Van Burn Boulevard along the Project’s northern boundary. This future extension of Van Buren Boulevard is proposed to intersect with the future extension of Western Way and would provide access to the proposed Veteran’s Industrial Park 215 development with the March Joint Powers Authority.

## 1.8 SITE ACCESS IMPROVEMENTS

The recommended site access driveway improvements for the Project are described below. Exhibit 1-4 also illustrates the site access improvements. Construction of on-site and site adjacent improvements shall occur in conjunction with adjacent Project development activity or as needed for Project access purposes.

EXHIBIT 1-4: SITE ACCESS RECOMMENDATIONS



- = Stop Sign Improvement
- = Existing Lane
- = Lane Improvement

**Natwar Lane/Driveway 3 & Driveway 1** – Install a stop control on the eastbound and southbound approach, and construct the intersection with the following geometrics:

- Northbound Approach: One shared left-through lane.
- Southbound Approach (Project Driveway 3): One shared through-right turn lane.
- Eastbound Approach (Project Driveway 1): One shared left-right turn lane.
- Westbound Approach: N/A

**Natwar Lane & Driveway 2** – Install a stop control on the eastbound approach and construct the intersection with the following geometrics:

- Northbound Approach: One through lane.
- Southbound Approach: One shared through-right turn lane.
- Eastbound Approach (Project Driveway 2): One right turn lane.
- Westbound Approach: N/A

**Western Way & Driveway 4** – Install a stop control on the eastbound approach and construct the intersection with the following geometrics:

- Northbound Approach: One through lane.
- Southbound Approach: One shared through-right turn lane.
- Eastbound Approach (Project Driveway 4): One right turn lane.
- Westbound Approach: N/A

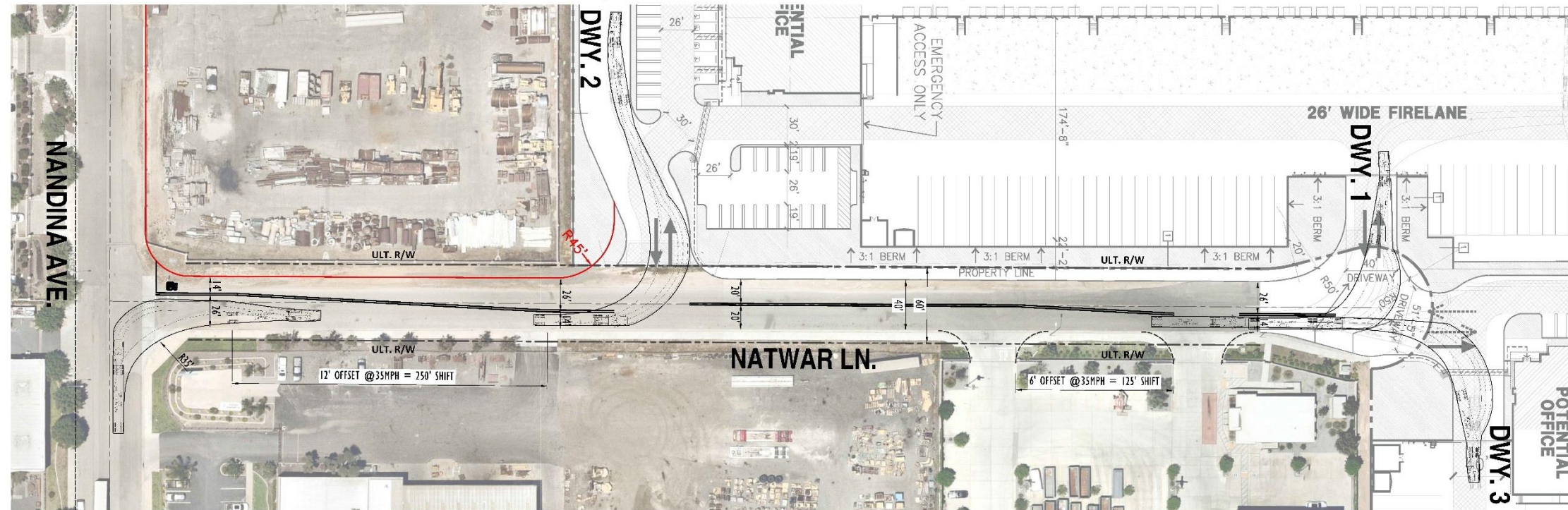
Wherever necessary, roadways adjacent to the Project, site access points and site-adjacent intersections will be constructed to be consistent with the identified roadway classifications and respective cross-sections in the PVCC Specific Plan or City of Perris General Plan Circulation Element.

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.

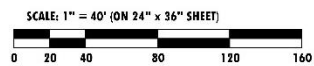
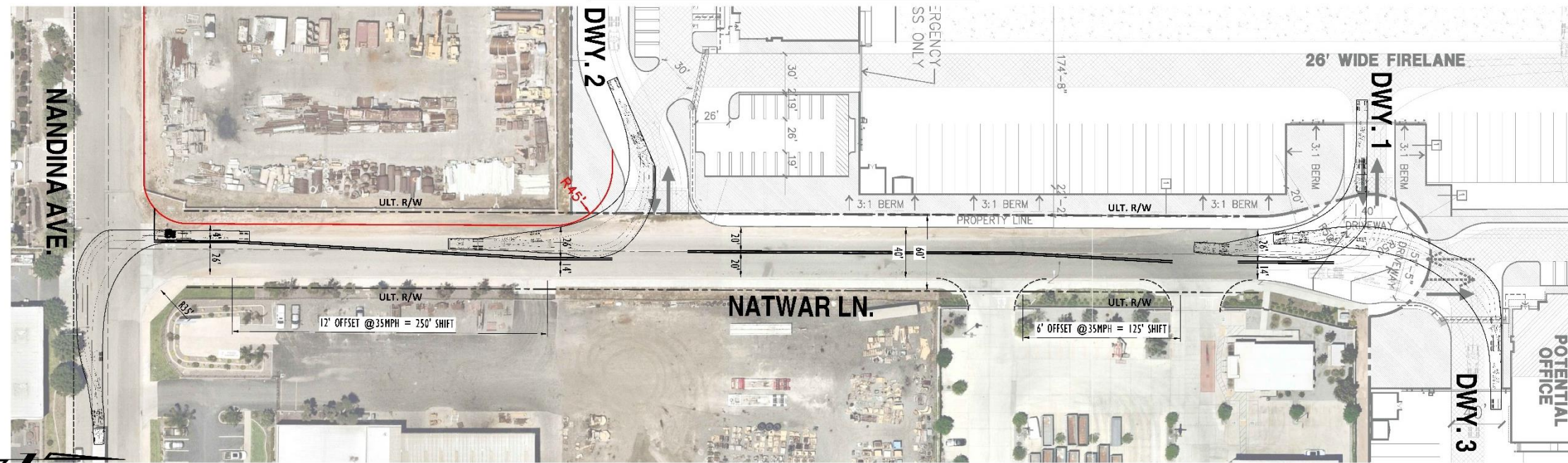
Sight distance at each project access point should be reviewed with respect to standard City of Perris/County of Riverside sight distance standards at the time of preparation of final grading, landscape and street improvement plans.

EXHIBIT 1-5: NATWAR LANE CONCEPT STRIPING WITH TRUCK TEMPLATES

INBOUND WB-67 TRUCK TURNS



OUTBOUND WB-67 TRUCK TURNS



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## 1.9 QUEUING ANALYSIS AT THE PROJECT DRIVEWAYS

A queuing analysis was conducted along the site adjacent roadways of Natwar Lane and Western Way for EAPC (2025) traffic conditions to determine the 95<sup>th</sup> percentile queues. The analysis was conducted for the weekday AM and weekday PM peak hours. The traffic modeling and signal timing optimization software package Synchro/SimTraffic (Version 11) has been utilized to assess queues at the Project access points. Synchro is a macroscopic traffic software program that is based on the signalized and unsignalized intersection capacity analyses as specified in the HCM. SimTraffic is designed to model networks of signalized and unsignalized intersections, with the primary purpose of checking and fine-tuning signal operations. SimTraffic uses the input parameters from Synchro to generate random simulations. The 95<sup>th</sup> percentile queue is not necessarily ever observed; it is simply based on statistical calculations (or Average Queue plus 1.65 standard deviations). Many jurisdictions utilize the 95<sup>th</sup> percentile queues for design purposes. SimTraffic simulations have been recorded 5 times, during the weekday AM and weekday PM peak hours, and has been seeded for 30-minute periods with 60-minute recording intervals. Queuing results are provided in Appendix 1.2. Based on the 95<sup>th</sup> percentile queues under EAPC (2025) traffic conditions, no driveway blockages are anticipated along Natwar Lane and Western Way during the peak hours.

### 1.10 TRUCK ACCESS

Due to the typical wide turning radius of large trucks, a truck turning template has been overlaid on the site plan at the Project driveways in order to determine appropriate curb radii and to verify that trucks will have sufficient space to execute turning maneuvers (see Exhibit 1-5 for Natwar Lane driveways and Exhibit 1-6 for Western Way driveway). Only driveways that are to be utilized by heavy trucks have been evaluated. As shown on Exhibits 1-5 and 1-6, it is recommended that the following curb radii be modified in order to accommodate the wide turning radius of heavy trucks (WB-67, which has a 53-foot trailer):

- Natwar Ln./Driveway 2: the southwest corner should accommodate a 45-foot curb radius.
- Western Wy. & Driveway 4: the southwest corner should accommodate a 40-foot curb radius.

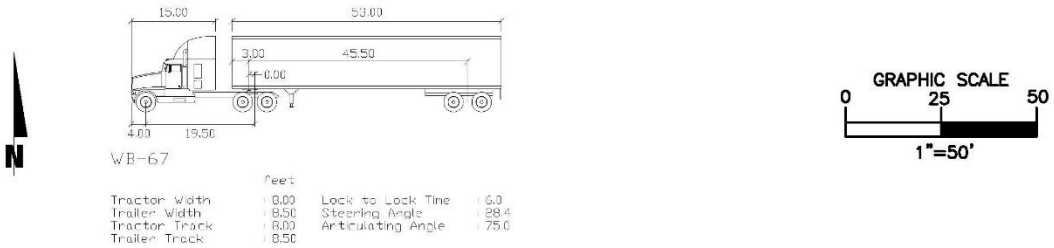
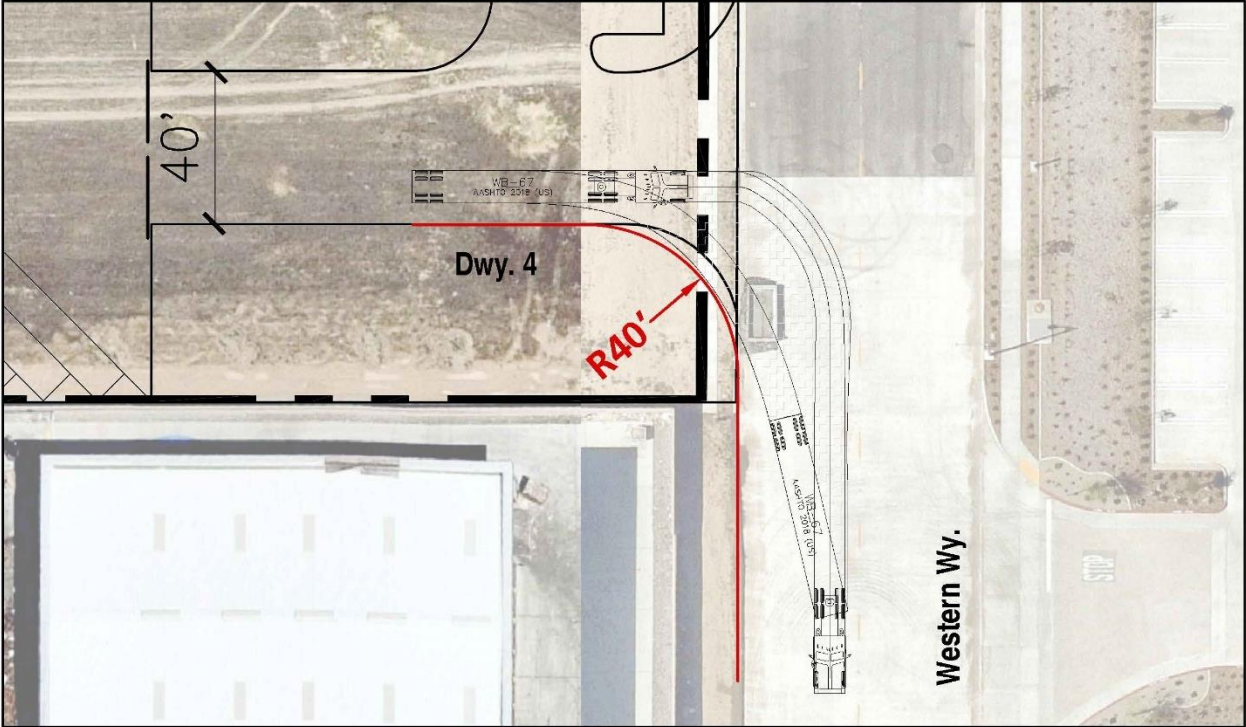
The intersection of Natwar Ln./Driveway 3 & Driveway 1 can accommodate the wide turning radius of heavy trucks as currently designed.

### 1.11 SPACING REQUIREMENTS

Western Avenue is classified as a Secondary per the PVCC, which requires a minimum of 660-feet to an adjacent driveway. Although Driveway 4 does not meet this minimum spacing requirement per the PVCC SP, there are no anticipated queuing issues along Western Avenue, according to the site adjacent queuing analysis as discussed in Section 1.9 *Queuing Analysis at the Project Driveways*. Additionally, there are no intersection operation deficiencies anticipated at this location.

Natwar Lane is classified as a Local Street, which requires a minimum of 200-feet to an adjacent driveway. Although Driveway 2 does not meet this minimum spacing requirement per the PVCC SP (based on the existing driveway on the east side of Natwar Lane), there are no anticipated queuing issues along Natwar Lane, according to the site adjacent queuing analysis as discussed in Section 1.9 *Queuing Analysis at the Project Driveways*. Additionally, there are no intersection operation deficiencies anticipated at this location.

**EXHIBIT 1-6: TRUCK TEMPLATES FOR WESTERN WAY**



## 2 METHODOLOGIES

This section of the report presents the methodologies used to perform the traffic analyses summarized in this report. The methodologies described are generally consistent with City of Perris traffic study guidelines.

### 2.1 LEVEL OF SERVICE

Traffic operations of roadway facilities are described using the term "Level of Service" (LOS). LOS is a qualitative description of traffic flow based on several factors such as speed, travel time, delay, and freedom to maneuver. Six levels are typically defined ranging from LOS A, representing completely free-flow conditions, to LOS F, representing breakdown in flow resulting in stop-and-go conditions. LOS E represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow.

### 2.2 INTERSECTION CAPACITY ANALYSIS

The definitions of LOS for interrupted traffic flow (flow restrained by the existence of traffic signals and other traffic control devices) differ slightly depending on the type of traffic control. The LOS is typically dependent on the quality of traffic flow at the intersections along a roadway. The Highway Capacity Manual (HCM) methodology expresses the LOS at an intersection in terms of delay time for the various intersection approaches. (5) The HCM uses different procedures depending on the type of intersection control.

#### 2.2.1 SIGNALIZED INTERSECTIONS

The City of Perris requires signalized intersection operations analysis based on the methodology described in the HCM. (6) Intersection LOS operations are based on an intersection's average control delay. Control delay includes initial deceleration delay, queue move-up time, stopped delay, and final acceleration delay. For signalized intersections, LOS is directly related to the average control delay per vehicle and is correlated to a LOS designation as described in Table 2-1. Study area intersections have been evaluated using the Synchro (Version 11) analysis software package.

Synchro is a macroscopic traffic software program that is based on the signalized intersection capacity analysis as specified in the HCM. Macroscopic level models represent traffic in terms of aggregate measures for each movement at the study intersections. Equations are used to determine measures of effectiveness such as delay and queue length. The level of service and capacity analysis performed by Synchro takes into consideration optimization and coordination of signalized intersections within a network.

**TABLE 2-1: SIGNALIZED INTERSECTION LOS THRESHOLDS**

Description	Average Control Delay (Seconds), V/C ≤ 1.0	Level of Service, V/C ≤ 1.0	Level of Service, V/C > 1.0
Operations with very low delay occurring with favorable progression and/or short cycle length.	0 to 10.00	A	F
Operations with low delay occurring with good progression and/or short cycle lengths.	10.01 to 20.00	B	F
Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear.	20.01 to 35.00	C	F
Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop and individual cycle failures are noticeable.	35.01 to 55.00	D	F
Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. This is considered to be the limit of acceptable delay.	55.01 to 80.00	E	F
Operation with delays unacceptable to most drivers occurring due to over saturation, poor progression, or very long cycle lengths	80.01 and up	F	F

Source: HCM, 6<sup>th</sup> Edition

The peak hour traffic volumes have been adjusted using a peak hour factor (PHF) to reflect peak 15-minute volumes. Common practice for LOS analysis is to use a peak 15-minute rate of flow. However, flow rates are typically expressed in vehicles per hour. The PHF is the relationship between the peak 15-minute flow rate and the full hourly volume (e.g.,  $PHF = \frac{\text{Hourly Volume}}{4 \times \text{Peak 15-minute Flow Rate}}$ ). The use of a 15-minute PHF produces a more detailed analysis as compared to analyzing vehicles per hour. Existing PHFs have been used for Existing (2021) baseline, E+P, EAC (2023), EAPC (2023), EAC (2025), and EAPC (2025) traffic conditions.

**2.2.2 UNSIGNALIZED INTERSECTIONS**

The City of Perris requires the operations of unsignalized intersections be evaluated using the methodology described the HCM. (5) The LOS rating is based on the weighted average control delay expressed in seconds per vehicle (see Table 2-2).

At two-way or side-street stop-controlled intersections, LOS is calculated for each controlled movement and for the left turn movement from the major street, as well as for the intersection as a whole. For approaches composed of a single lane, the delay is computed as the average of all movements in that lane. The “worst case” movement delay and LOS is reported for the intersection. For all-way stop controlled intersections, LOS is computed for the intersection as a whole.

**TABLE 2-2: UNSIGNALIZED INTERSECTION LOS THRESHOLDS**

Description	Average Control Delay Per Vehicle (Seconds)	Level of Service, V/C ≤ 1.0	Level of Service, V/C > 1.0
Little or no delays.	0 to 10.00	A	F
Short traffic delays.	10.01 to 15.00	B	F
Average traffic delays.	15.01 to 25.00	C	F
Long traffic delays.	25.01 to 35.00	D	F
Very long traffic delays.	35.01 to 50.00	E	F
Extreme traffic delays with intersection capacity exceeded.	> 50.00	F	F

Source: HCM, 6<sup>th</sup> Edition

**2.3 TRAFFIC SIGNAL WARRANT ANALYSIS METHODOLOGY**

The term "signal warrants" refers to the list of established criteria used by the Caltrans and other public agencies to quantitatively justify or ascertain the potential need for installation of a traffic signal at an otherwise unsignalized intersection. This TA uses the signal warrant criteria presented in the latest edition of the California Department of Transportation (Caltrans) California Manual on Uniform Traffic Control Devices (CA MUTCD) for all study area intersections. (7)

The signal warrant criteria for Existing conditions are based upon several factors, including volume of vehicular and pedestrian traffic, frequency of accidents, and location of school areas. The Caltrans CA MUTCD indicates that the installation of a traffic signal should be considered if one or more of the signal warrants are met. (7) Specifically, this TA utilizes the Peak Hour Volume-based Warrant 3 as the appropriate representative traffic signal warrant analysis for existing study area intersections for all analysis scenarios. Warrant 3 is appropriate to use for this TA because it provides specialized warrant criteria for intersections with rural characteristics (e.g., located in communities with populations of less than 10,000 persons or with adjacent major streets operating above 40 miles per hour). For the purposes of this study, the speed limit was the basis for determining whether Urban or Rural warrants were used for a given intersection.

Future intersections that do not currently exist have been assessed regarding the potential need for new traffic signals based on future average daily traffic (ADT) volumes, using the Caltrans planning level ADT-based signal warrant analysis worksheets. Traffic signal warrant analyses were performed for the following study area intersection shown in Table 2-3:

**TABLE 2-3: TRAFFIC SIGNAL WARRANT ANALYSIS LOCATIONS**

ID	Intersection Location	Jurisdiction
3	Natwar Ln./Driveway 3 & Driveway 1 - Future Intersection	City of Perris
4	Natwar Ln. & Driveway 2 - Future Intersection	City of Perris
5	Natwar Ln. & Nandina Av.	City of Perris
6	Western Wy. & Driveway 4 - Future Intersection	City of Perris
7	Western Wy. & Nandina Av.	City of Perris

Traffic signal warrant analyses were performed for all of the full access unsignalized study area intersections. The Existing conditions traffic signal warrant analysis is presented in the subsequent section, Section 3 *Area Conditions* of this report. The traffic signal warrant analyses for future conditions are presented in Section 5 *E+P Traffic Conditions*, Section 6 *EAC and EAPC (2023) Traffic Conditions*, and Section 7 *EAC and EAPC (2025) Traffic Conditions* of this report.

It is important to note that a signal warrant defines the minimum condition under which the installation of a traffic signal might be warranted. Meeting this threshold condition does not require that a traffic control signal be installed at a particular location, but rather, that other traffic factors and conditions be evaluated in order to determine whether the signal is truly justified. It should also be noted that signal warrants do not necessarily correlate with LOS. An intersection may satisfy a signal warrant condition and operate at or above acceptable LOS or operate below acceptable LOS and not meet a signal warrant.

## 2.4 FREEWAY OFF-RAMP QUEUING ANALYSIS

Consistent with Caltrans requirements, the 95<sup>th</sup> percentile queuing of vehicles has been assessed at the off-ramps to determine potential queuing deficiencies at the freeway ramp intersections at the I-215 Freeway at Harley Knox Boulevard interchange. Specifically, the queuing analysis is utilized to identify any potential queuing and “spill back” onto the I-215 Freeway mainline from the off-ramps.

The traffic progression analysis tool and HCM intersection analysis program, Synchro, has been used to assess the potential deficiencies/needs of the intersections with traffic added from the proposed Project. Storage (turn-pocket) length recommendations at the ramps have been based upon the 95<sup>th</sup> percentile queue resulting from the Synchro progression analysis. The footnote from the Synchro output sheets indicates if the 95<sup>th</sup> percentile cycle exceeds capacity. Traffic is simulated for two complete cycles of the 95<sup>th</sup> percentile traffic in Synchro in order to account for the effects of spillover between cycles. In practice, the 95<sup>th</sup> percentile queue shown will rarely be exceeded and the queues shown with the footnote are acceptable for the design of storage bays.

Although only the 95<sup>th</sup> percentile queue has been reported in the tables, the 50<sup>th</sup> percentile queue can be found in the appendix alongside the 95<sup>th</sup> percentile queue for each ramp location. The queue length reported is for the lane with the highest queue in the lane group. The 50<sup>th</sup> percentile or average queue represents the typical queue length for peak hour traffic conditions, while the 95<sup>th</sup> percentile queue is derived from the average queue plus 1.65 standard deviations. The 95<sup>th</sup> percentile queue is not necessarily ever observed it is simply based on statistical calculations.

## 2.5 MINIMUM LEVEL OF SERVICE (LOS)

The definition of an intersection deficiency has been obtained from the City of Perris' General Plan. LOS D along all City maintained roads (including intersections) and LOS D along I-215 and SR-74 (including intersections with local streets and roads). An exception to the local road standard is LOS E, at intersections of any Arterials and Expressways with SR-74, the Ramona-Cajalco Expressway, or at I-215 Freeway ramps. (8)

LOS E may be allowed within the boundaries of the Downtown Specific Plan Area to the extent that it would support transit-oriented development and walkable communities. Increased congestion in this area will facilitate an increase in transit ridership and encourage development of a complementary mix of land uses within a comfortable walking distance from light rail stations.

## 2.6 DEFICIENCY CRITERIA

This section outlines the methodology used in this analysis related to identifying circulation system deficiencies. The following deficiency criteria has been utilized for the City of Perris. To determine whether the addition of project-related traffic at a study intersection would result in a deficiency, the following will be utilized:

- A project-related deficiency is considered direct and significant when a study intersection operates at an acceptable LOS for existing conditions (without the project) and the addition of 50 or more AM or PM peak hour project trips causes the intersection to operate at an unacceptable LOS for existing plus project (E+P) traffic conditions.
- A project-related deficiency is considered direct and significant when a study intersection operates at an unacceptable LOS for existing conditions (without the project) and the addition of 50 or more AM or PM peak hour project trips causes the intersection delay to increase by 2 seconds or more.
- A cumulative deficiency is considered significant when a study intersection is forecast to operate at an unacceptable LOS with the addition of cumulative/background traffic and 50 or more AM or PM peak hour project trips.

## 2.6 PROJECT FAIR SHARE CALCULATION METHODOLOGY

Improvements found to be included in the NPRBBD (which are inclusive of TUMF and DIF), will be identified as such. For improvements that do not appear to be in either of the pre-existing fee programs, a fair share financial contribution based on the Project's proportional share may be imposed in order to mitigate the Project's share of deficiencies in lieu of construction. It should be noted that fair share calculations are for informational purposes only and the City Engineer will determine the appropriate improvements to be implemented by a project (to be identified in the conditions of approval).

If the intersection is currently operating at acceptable LOS under Existing traffic conditions, the Project's fair share cost of improvements would be determined based on the following equation, which is the ratio of Project traffic to new traffic, where new traffic is total future traffic less existing baseline traffic:

$$2025 \text{ Project Fair Share } \% = \text{Project Traffic} / (\text{EAPC (2025) Total Traffic} - \text{Existing Traffic})$$

### **3 AREA CONDITIONS**

This section provides a summary of the existing circulation network, the City of Perris General Plan Circulation Network, and a review of existing peak hour intersection operations, traffic signal warrant, and off-ramp queuing analyses.

#### **3.1 EXISTING CIRCULATION NETWORK**

Pursuant to the scoping agreement with City of Perris staff (Appendix 1.1), the study area includes a total of 8 existing and future intersections as shown previously on Exhibit 1-2. Exhibit 3-1 illustrates the study area intersections located near the proposed Project and identifies the number of through traffic lanes for existing roadways and intersection traffic controls.

#### **3.2 GENERAL PLAN CIRCULATION ELEMENTS**

As noted previously, the Project site is located within PVCC SP in the City of Perris. Exhibit 3-2 shows the City of Perris General Plan Circulation Element, and Exhibit 3-3 illustrates the City of Perris General Plan roadway cross-sections. Exhibit 3-4 illustrates the PVCC SP Circulation Plan and Exhibit 3-5 shows the corresponding PVCC SP roadway cross-sections.

#### **3.3 TRUCK ROUTES**

The City of Perris designated truck route map is shown on Exhibit 3-6. Harley Knox Boulevard is identified as designated truck routes. The PVCC SP truck route plan is shown on Exhibit 3-7. The truck routes identified within the study area on Exhibit 3-7 are consistent with those identified on Exhibit 3-6. These designated truck route maps have been utilized to route truck traffic from the Project and future cumulative development projects throughout the study area.

#### **3.4 TRANSIT SERVICE**

Mass transit routes within the PVCC SP are shown on Exhibit 3-8. The study area is currently served by the Riverside Transit Authority (RTA), a public transit agency serving the Riverside County region. Transit service is reviewed and updated by 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.

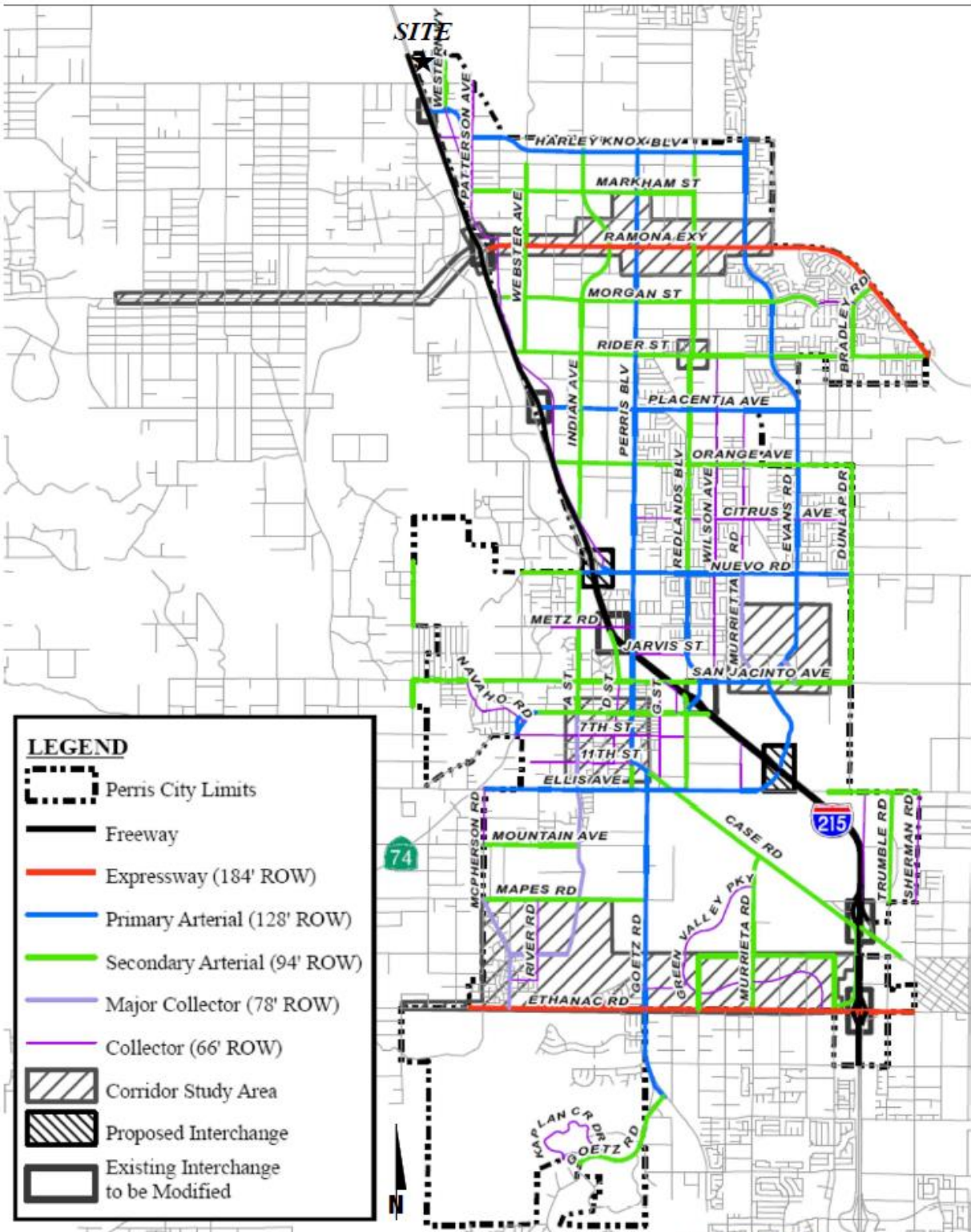
**EXHIBIT 3-1: EXISTING NUMBER OF THROUGH LANES AND INTERSECTION CONTROLS**



<p><b>1</b> I-215 SB Ramps &amp; Harley Knox Bl.</p> <p>DEF</p>	<p><b>2</b> I-215 NB Ramps &amp; Harley Knox Bl.</p> <p>6D</p>	<p><b>3</b> Natwar Ln. &amp; Dwy. 3 / Dwy. 1</p> <p>Future Intersection</p>	<p><b>4</b> Natwar Ln. &amp; Dwy. 2</p> <p>Future Intersection</p>
<p><b>5</b> Natwar Ln. &amp; Nandina Av.</p> <p>2U</p>	<p><b>6</b> Western Wy. &amp; Nandina Av.</p> <p>Future Intersection</p>	<p><b>7</b> Western Wy. &amp; Nandina Av.</p> <p>2U</p>	<p><b>8</b> Western Wy. &amp; Harley Knox Bl.</p> <p>2U</p> <p>6D</p>

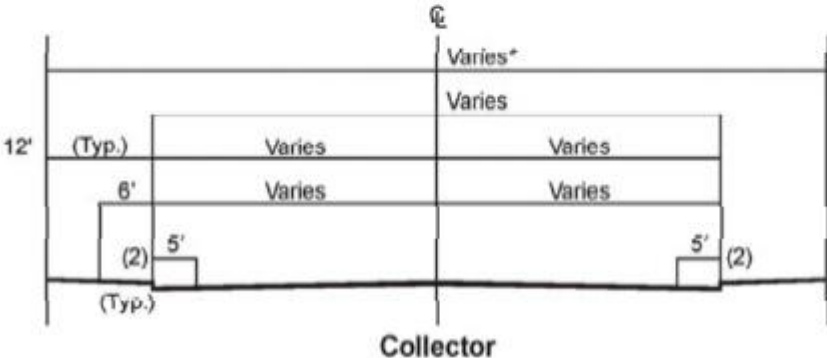
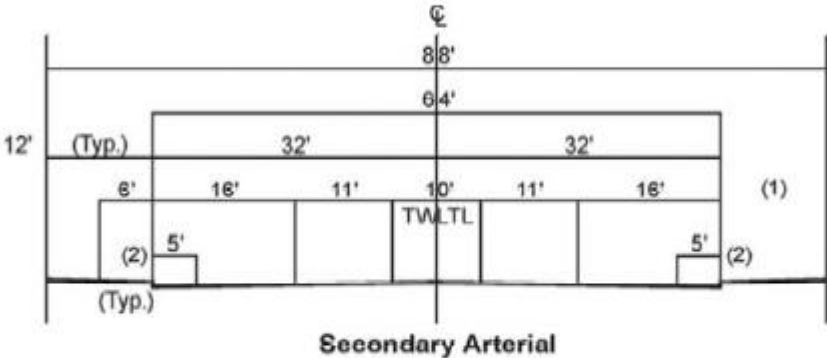
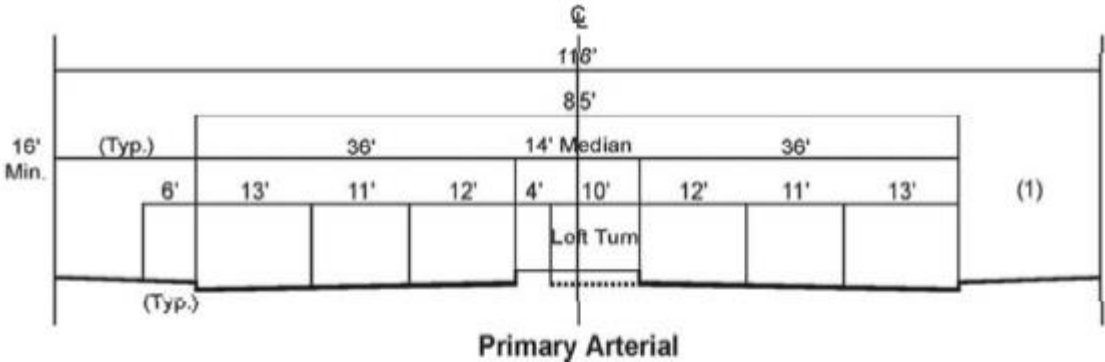
- = Traffic Signal
- = All Way Stop
- = Stop Sign
- 4** = Number of Lanes
- D** = Divided
- U** = Undivided
- DEF** = Defacto Right Turn

EXHIBIT 3-2: CITY OF PERRIS GENERAL PLAN CIRCULATION ELEMENT



Source: City of Perris General Plan, 2005, As Amended Riverside Co. 2008

**EXHIBIT 3-3: CITY OF PERRIS GENERAL PLAN ROADWAY CROSS-SECTIONS**



**Legend**

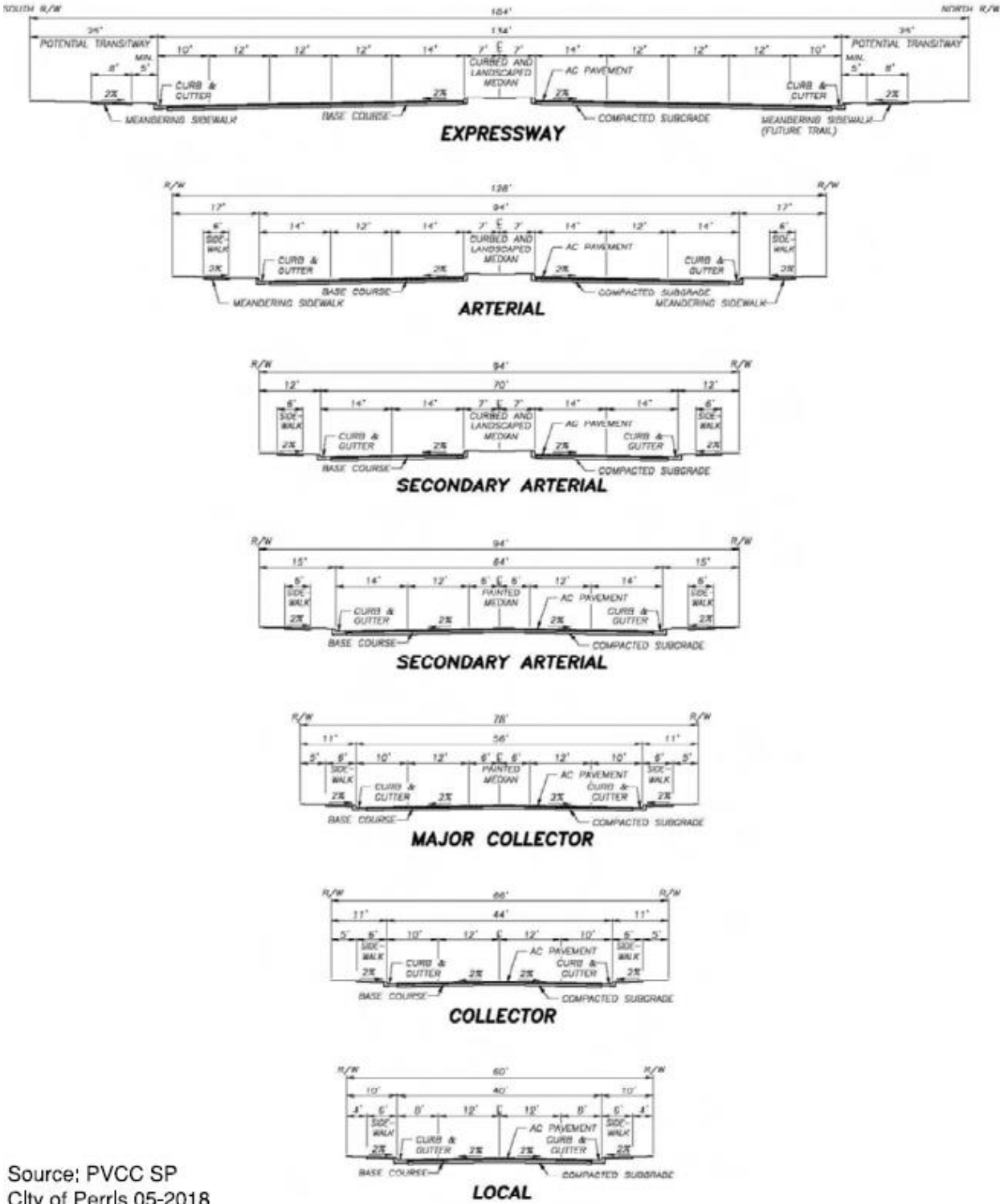
- (1) No stopping any time both sides.
- (2) Bike lane where designated.
- \* The width of the collector street can range from 40 feet to 64 feet curb-to-curb.
- TWLT = Two Way Left Turn Lane

Source: City of Perris  
General Plan 8-2008

EXHIBIT 3-4: PERRIS VALLEY COMMERCE CENTER SPECIFIC PLAN CIRCULATION PLAN

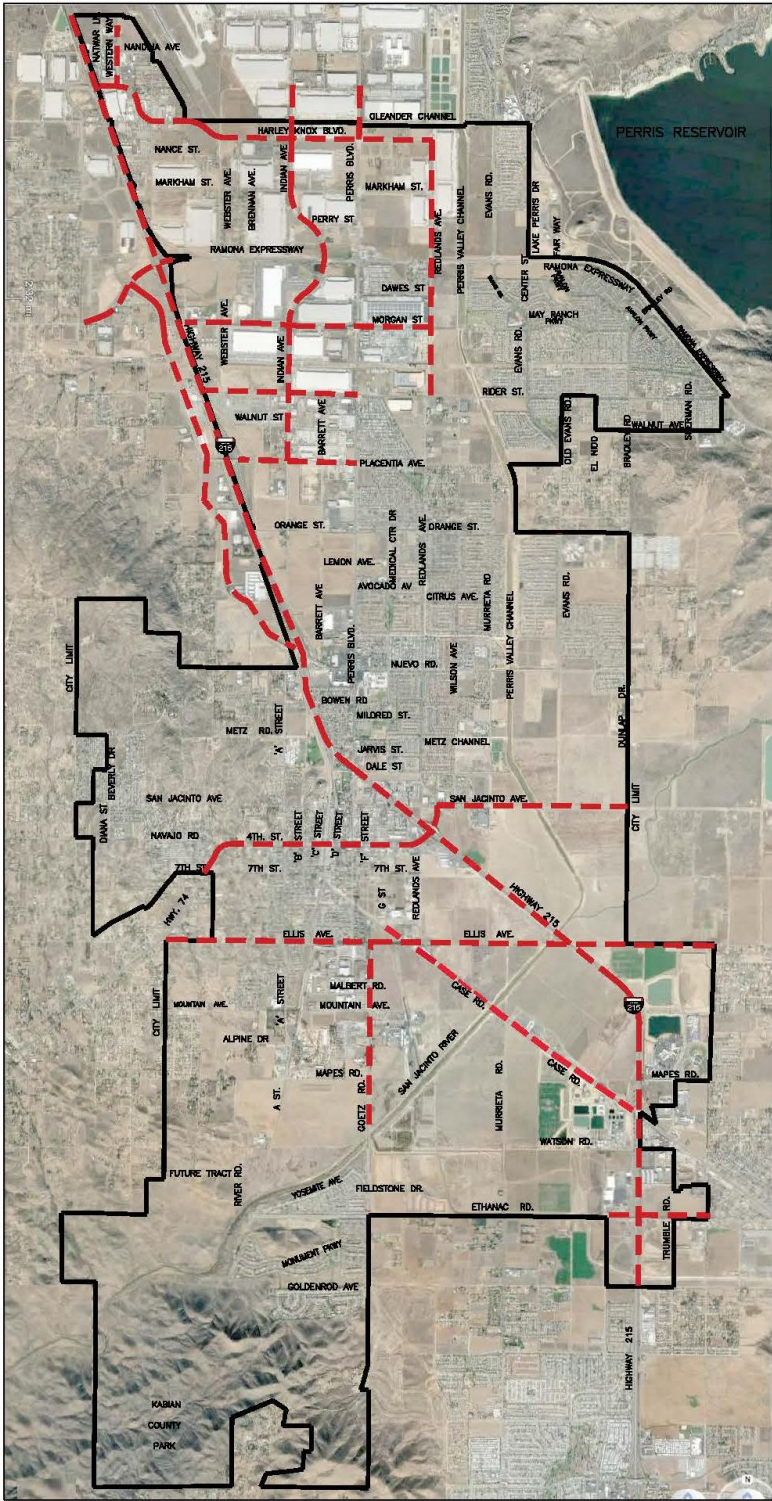


**EXHIBIT 3-5: PERRIS VALLEY COMMERCE CENTER SPECIFIC PLAN CROSS-SECTIONS**



Source; PVCC SP  
City of Perris 05-2018

EXHIBIT 3-6: CITY OF PERRIS TRUCK ROUTES



N.T.S.

**LEGEND:**

- - - TRUCK ROUTES
- PERRIS CITY LIMITS





EXHIBIT 3-8: PERRIS VALLEY COMMERCE CENTER SPECIFIC PLAN MASS TRANSIT ROUTES



### 3.5 BICYCLE & PEDESTRIAN FACILITIES

In an effort to promote alternative modes of transportation, the City of Perris also includes a proposed bikeways and trail system. The City of Perris proposed bikeways and trail system is shown on Exhibit 3-9. Harley Knox Boulevard currently has Class II bike lanes. PVCC SP Trail System is shown on Exhibit 3-10. Field observations conducted in March 2019 (pre-COVID) indicate nominal pedestrian and bicycle activity within the study area and is not anticipated to be much different from current activity based on the development that has occurred in the immediate vicinity since March 2019. Exhibit 3-11 illustrates the existing bicycle and pedestrian facilities, including bike lanes, sidewalks and crosswalk locations.

### 3.6 EXISTING TRAFFIC COUNTS

The intersection LOS analysis is based on the traffic volumes observed during the peak hour conditions using traffic count data collected in March 2020, when local schools were in session and operating on a typical bell schedule (prior to closures related to the COVID-19 pandemic). The following peak hours were selected for analysis:

- Weekday AM Peak Hour (peak hour between 7:00 AM and 9:00 AM)
- Weekday PM Peak Hour (peak hour between 4:00 PM and 6:00 PM)

The weekday AM and weekday PM peak hour count data are representative of typical weekday peak hour traffic conditions in the study area. There were no observations made in the field that would indicate atypical traffic conditions on the count dates, such as construction activity or detour routes and near-by schools were in session and operating on normal schedules. In order to reflect 2021 conditions, a growth rate of 3 percent per year has been applied to the 2020 traffic counts.

The raw manual peak hour turning movement traffic count data sheets are included in Appendix 3.1. These raw turning volumes have been flow conserved between intersections with limited access, no access, and where there are currently no uses generating traffic. The traffic counts collected in March 2019 include the vehicle classifications as shown below:

- Passenger Cars
- 2-Axle Trucks
- 3-Axle Trucks
- 4 or More Axle Trucks

To represent the impact large trucks, buses, and recreational vehicles have on traffic flow, all trucks were converted into PCEs. By their size alone, these vehicles occupy the same space as two or more passenger cars. In addition, the time it takes for them to accelerate and slow-down is also much longer than for passenger cars and varies depending on the type of vehicle and number of axles. For this analysis, a PCE factor of 1.5 has been applied to 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for 4+-axle trucks to estimate each turning movement. These factors are consistent with the values recommended for use in the County of Riverside's traffic study guidelines. (9)

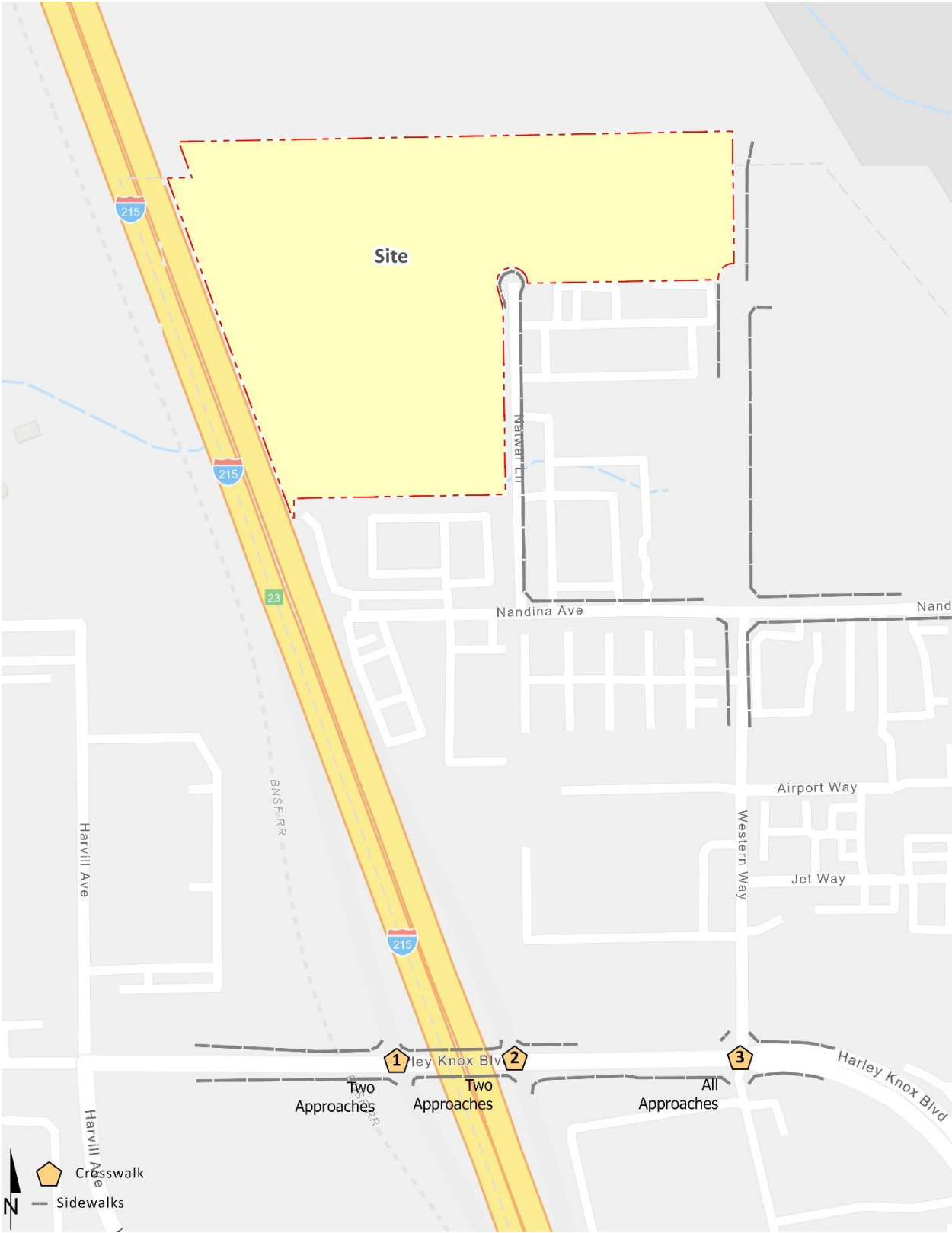
EXHIBIT 3-9: CITY OF PERRIS PROPOSED BIKEWAYS AND TRAIL IMPROVEMENTS



EXHIBIT 3-10: PERRIS VALLEY COMMERCE CENTER SPECIFIC PLAN TRAIL SYSTEM



EXHIBIT 3-11: EXISTING PEDESTRIAN FACILITIES



Existing weekday ADT volumes on arterial highways throughout the study area are shown on Exhibit 3-12 (in actual vehicles). Where actual 24-hour tube count data was not available, Existing ADT volumes were based upon factored intersection peak hour counts collected by Urban Crossroads, Inc. using the following formula for each intersection leg:

$$\text{Weekday PM Peak Hour (Approach Volume + Exit Volume)} \times 21.39 = \text{Leg Volume}$$

A comparison of the PM peak hour and daily traffic volumes of various roadway segments within the study area indicated that the peak-to-daily relationship is approximately 4.68 percent. As such, the above equation utilizing a factor of 21.39 estimates the ADT volumes on the study area roadway segments assuming a peak-to-daily relationship of approximately 4.68 percent (i.e.,  $1/0.0468 = 21.39$ ) and was assumed to sufficiently estimate average daily traffic (ADT) volumes for planning-level analyses. Existing weekday AM and weekday PM peak hour intersection volumes (in actual vehicles) are also shown on Exhibit 3-12.

### 3.7 INTERSECTION OPERATIONS ANALYSIS

Existing peak hour traffic operations have been evaluated for the study area intersections based on the analysis methodologies presented in Section 2.2 *Intersection Capacity Analysis* of this report. The intersection operations analysis results are summarized in Table 3-1 which indicates that the study area intersections are currently operating at an acceptable LOS during the peak hours (i.e., LOS D or better). The intersection operations analysis worksheets are included in Appendix 3.2 of this TA.

**TABLE 3-1: INTERSECTION ANALYSIS FOR EXISTING (2021) CONDITIONS**

# Intersection	Traffic Control <sup>1</sup>	Delay <sup>2</sup> (secs.)		Level of Service	
		AM	PM	AM	PM
1 I-215 SB Ramps & Harley Knox Bl.	TS	18.9	24.9	B	C
2 I-215 NB Ramps & Harley Knox Bl.	TS	49.5	12.3	D	B
3 Natwar Ln./Driveway 3 & Driveway 1		Future Intersection			
4 Natwar Ln. & Driveway 2		Future Intersection			
5 Natwar Ln. & Nandina Av.	CSS	8.7	8.7	A	A
6 Western Wy. & Driveway 4		Future Intersection			
7 Western Wy. & Nandina Av.	AWS	7.4	6.8	A	A
8 Western Wy. & Harvey Knox Bl.	TS	11.2	6.8	B	A

<sup>1</sup> AWS = All-way Stop; CSS = Cross-street Stop; TS = Traffic Signal

<sup>2</sup> Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

**EXHIBIT 3-12: EXISTING (2021) TRAFFIC VOLUMES (IN ACTUAL VEHICLES)**



1	2	3	4	5																											
I-215 SB Ramps & Harley Knox Bl.	I-215 NB Ramps & Harley Knox Bl.	Natwar Ln./Driveway 3 & Driveway 1	Natwar Ln. & Driveway 2	Natwar Ln. & Nandina Av.																											
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###(##) AM(PM) Peak Hour Intersection Volumes  
 ## Average Daily Trips

### 3.8 TRAFFIC SIGNAL WARRANTS ANALYSIS

Traffic signal warrants for Existing traffic conditions are based on existing peak hour intersection turning volumes. There are no study area intersections that currently warrant a traffic signal for Existing (2021) traffic conditions. Existing conditions traffic signal warrant analysis worksheets are provided in Appendix 3.3.

### 3.9 OFF-RAMP QUEUING ANALYSIS

A queuing analysis was performed for the off-ramps at the I-215 Freeway at Harley Knox Boulevard interchange to assess vehicle queues for the off ramps that may potentially result in deficient peak hour operations at the ramp-to-arterial intersections and may potentially “spill back” onto the I-215 Freeway mainline. Queuing analysis findings are presented in Table 3-2. It is important to note that off-ramp lengths are consistent with the measured distance between the intersection and the freeway mainline. As shown in Table 3-2, there are no off-ramp movements that are currently experiencing queuing issues during the weekday AM or weekday PM peak 95<sup>th</sup> percentile traffic flows. However, field observations of the I-215 Freeway interchange at Harley Knox Boulevard indicate that there are queues during the peak hours, including at the I-215 Southbound Ramps on Harley Knox Boulevard. Worksheets for Existing (2021) traffic conditions off-ramp queuing analysis are provided in Appendix 3.4.

**TABLE 3-2: PEAK HOUR FREEWAY OFF-RAMP QUEUING SUMMARY FOR EXISTING (2021) CONDITIONS**

# Intersection	Movement	Available Stacking Distance (Feet)	95th Percentile Queue (Feet)		Acceptable? <sup>1</sup>	
			AM Peak Hour	PM Peak Hour	AM	PM
1 I-215 Southbound Ramps & Harley Knox Bl.	SBL/T	1,330	351	216	Yes	Yes
	SBR	270	41	35	Yes	Yes
2 I-215 Northbound Ramps & Harley Knox Bl.	NBL/T	1,120	23	29	Yes	Yes
	NBR	265	28	53	Yes	Yes

<sup>1</sup> Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

<sup>2</sup> 95th percentile volume exceeds capacity, queue may be longer. Queue shown is maximum after two cycles.

## 4 PROJECTED FUTURE TRAFFIC

The Project is proposed to consist of a single 419,034 sf warehouse building (Building 1) and a second 139,971 sf warehouse building (Building 2). However, for the purposes of this traffic study, the building size evaluated for Building 1 will assume up to 450,000 sf. Building 1 is anticipated to be constructed by the year 2023 while Project Buildout is anticipated by year 2025. Vehicular and truck traffic access will be provided via the following driveways:

- Natwar Ln./Driveway 3 & Driveway 1 – full access at for trucks only at Driveway 1; right-in access only for trucks at Driveway 3; full access for passenger cars at Driveway 3
- Natwar Ln. & Driveway 2 – full access for both passenger cars and trucks
- Western Wy. & Driveway 4 – full access for passenger cars; right-out access only for trucks

Regional access to the Project site is provided via the I-215 Freeway and Harley Knox Boulevard.

### 4.1 PROJECT TRIP GENERATION

Trip generation represents the amount of traffic that is attracted and produced by a development and is based upon the specific land uses planned for a given project. Trip generation rates for the Project are shown in Table 4-1 together with the PCE trip generation summary illustrating daily and peak hour trip generation estimates based on the Institute of Transportation Engineers (ITE) Trip Generation Manual (10<sup>th</sup> Edition, 2017). (2) (10) For purposes of this analysis, the following ITE land use codes and vehicle mixes have been utilized:

- High-Cube Fulfillment Center Warehouse has been used to derive site specific trip generation estimates for up to 350,000 square feet of the proposed Project. The Institute of Transportation Engineers (ITE) Trip Generation Manual Supplement (February 2020) has trip generation rates for high-cube fulfillment center use for both non-sort and sort facilities (ITE land use code 155). While there is sufficient data to support use of the trip generation rates for non-sort facilities, the sort-facility rate appears to be unreliable because they are based on limited data (i.e., one to two surveyed sites). The proposed Project is speculative and whether a non-sort or sort facility end-user would occupy the Project is not known at this time. Lastly, the ITE Trip Generation Manual recommends the use of local data sources where available. As such, the best available source for high-cube fulfillment center use would be the trip-generation statistics published in the High-Cube Warehouse Trip Generation Study (WSP, January 29, 2019) which was commissioned by the Western Riverside Council of Governments (WRCOG) in support of the Transportation Uniform Mitigation Fee (TUMF) Update in the County of Riverside. The WSP trip generation rates were published in January 2019 and are based on data collected at 11 local high-cube fulfillment center sites located throughout Southern California (specifically Riverside County and San Bernardino County). However, the WSP study does not include a split for inbound and outbound vehicles, as such, the inbound and outbound splits per the ITE Trip Generation Manual for ITE Land Use Code 154 have been utilized.
- ITE land use code 140 (Manufacturing) has been used to derive site specific trip generation estimates for up to 100,000 sf. The vehicle mix has been obtained from the ITE's Trip Generation Manual Supplement (dated February 2020). This study provides the following vehicle mix: AM Peak Hour: 92.0% passenger cars and 8.0% trucks; PM Peak Hour: 93.0% passenger cars and 7.0%

trucks; Weekday Daily: 90.0% passenger cars and 10.0% trucks. The truck percentages were further broken down by axle type per the following South Coast Air Quality Management District (SCAQMD) recommended truck mix: 2-Axle = 16.7%; 3-Axle = 20.7%; 4+-Axle = 62.6%. The vehicle mix from the Trip Generation Manual Supplement is provided in Attachment A.

- ITE land use code 150 (Warehousing) has been used to derive site specific trip generation estimates for up to 139,971 sf. The vehicle mix has been obtained from the ITE’s Trip Generation Manual Supplement (dated February 2020). This study provides the following vehicle mix: AM Peak Hour: 87.0% passenger cars and 13.0% trucks; PM Peak Hour: 85.0% passenger cars and 15.0% trucks; Weekday Daily: 73.0% passenger cars and 27.0% trucks. The truck percentages were further broken down by axle type per the following SCAQMD recommended truck mix: 2-Axle = 16.7%; 3-Axle = 20.7%; 4+-Axle = 62.6%.

**TABLE 4-1: ITE TRIP GENERATION RATES**

Land Use <sup>1</sup>	Units <sup>2</sup>	ITE LU Code	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
<b>Actual Vehicles:</b>									
Manufacturing <sup>3</sup>	TSF	140	0.477	0.143	0.620	0.208	0.462	0.670	3.930
Passenger Cars			0.439	0.131	0.570	0.193	0.430	0.623	3.537
2-Axle Trucks			0.006	0.002	0.008	0.002	0.005	0.008	0.066
3-Axle Trucks			0.008	0.002	0.010	0.003	0.007	0.010	0.081
4+-Axle Trucks			0.024	0.007	0.031	0.009	0.020	0.029	0.246
Warehousing <sup>3</sup>	TSF	150	0.131	0.039	0.170	0.051	0.139	0.190	1.740
Passenger Cars			0.114	0.034	0.148	0.044	0.118	0.162	1.270
2-Axle Trucks			0.003	0.001	0.004	0.001	0.003	0.005	0.078
3-Axle Trucks			0.004	0.001	0.005	0.002	0.004	0.006	0.097
4+-Axle Trucks			0.011	0.003	0.014	0.005	0.013	0.018	0.294
High-Cube Fulfillment Center Warehouse <sup>4</sup>	TSF	--	0.094	0.028	0.122	0.046	0.119	0.165	2.129
Passenger Cars			0.079	0.024	0.103	0.040	0.104	0.144	1.750
2-4 Axle Trucks			0.006	0.002	0.008	0.003	0.008	0.011	0.162
5+-Axle Trucks			0.008	0.003	0.011	0.003	0.007	0.010	0.217
<b>Passenger Car Equivalent (PCE):<sup>5</sup></b>									
Manufacturing <sup>3</sup>	TSF	140	0.477	0.143	0.620	0.208	0.462	0.670	3.930
Passenger Cars			0.439	0.131	0.570	0.193	0.430	0.623	3.537
2-Axle Trucks (PCE = 1.5)			0.010	0.003	0.012	0.004	0.008	0.012	0.098
3-Axle Trucks (PCE = 2.0)			0.016	0.005	0.021	0.006	0.013	0.019	0.163
4+-Axle Trucks (PCE = 3.0)			0.072	0.021	0.093	0.027	0.061	0.088	0.738
Warehousing <sup>3</sup>	TSF	150	0.131	0.039	0.170	0.051	0.139	0.190	1.740
Passenger Cars			0.114	0.034	0.148	0.044	0.118	0.162	1.270
2-Axle Trucks (PCE = 1.5)			0.004	0.001	0.006	0.002	0.005	0.007	0.118
3-Axle Trucks (PCE = 2.0)			0.007	0.002	0.009	0.003	0.009	0.012	0.194
4+-Axle Trucks (PCE = 3.0)			0.032	0.010	0.042	0.014	0.039	0.054	0.882
High-Cube Fulfillment Center Warehouse <sup>4</sup>	TSF	--	0.094	0.028	0.122	0.046	0.119	0.165	2.129
Passenger Cars			0.079	0.024	0.103	0.040	0.104	0.144	1.750
2-4 Axle Trucks (PCE = 2.0)			0.012	0.004	0.016	0.006	0.016	0.022	0.324
5+-Axle Trucks (PCE = 3.0)			0.025	0.008	0.033	0.008	0.022	0.030	0.651

<sup>1</sup> Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition (2017).

<sup>2</sup> TSF = thousand square feet

<sup>3</sup> Vehicle Mix Source: ITE Trip Generation Handbook Supplement (2020), Appendix C.

Truck Mix: South Coast Air Quality Management District’s (SCAQMD) recommended truck mix, by axle type.  
Normalized % - Without Cold Storage: 16.7% 2-Axle trucks, 20.7% 3-Axle trucks, 62.6% 4-Axle trucks.

<sup>4</sup> Vehicle Mix Source: High Cube Warehouse Trip Generation Study, WSP, January 29, 2019.

Inbound and outbound split source: ITE Trip Generation Manual, Tenth Edition (2017) for ITE Land Use Code 154.

<sup>5</sup> PCE factors: 2-axle = 1.5; 3-axle = 2.0; 4+-axle = 3.0.

The aforementioned ITE land use codes and vehicle mixes were selected based on the building size and configuration of each proposed building and to allow flexibility of the future use, since the future tenants of the proposed buildings are currently unknown. The Project Applicant anticipates that a high-cube warehouse distribution operator would occupy Building 1 and a warehouse would occupy Building 2. Because the ITE manufacturing trip rate is one of the highest trip rates among the industrial land use categories, it was applied to a portion of the total square footage for Building 1 to provide a conservative analysis that would overestimate trips. While manufacturing is an unlikely use in Southern California due to labor costs, etc., it is common practice to apply a manufacturing rate to a portion of an industrial park in an effort to overestimate trips. Using a higher total trip generation provides a conservative analysis of (i.e., overestimates) environmental impacts relating to transportation, and associated air quality, greenhouse gas emissions, and noise.

As noted on Table 4-2, refinements to the raw trip generation estimates have been made to provide a more detailed breakdown of trips between passenger cars and trucks. Trip generation for heavy trucks was further broken down by truck type (or axle type). The total truck percentage is comprised of 3 different truck types: 2-axle, 3-axle, and 4+-axle trucks. PCE factors were applied to the trip generation rates for heavy trucks (large 2-axles, 3-axles, 4+-axles). PCEs allow the typical “real-world” mix of vehicle types to be represented as a single, standardized unit, such as the passenger car, to be used for the purposes of capacity and level of service analyses. The PCE factors are consistent with the recommended PCE factors in the County’s traffic study guidelines. (9)

The proposed Project’s trip generation, based on actual vehicles, is included in Table 4-2 for informational purposes only as the operations analysis has been based on the PCE trips per the City’s requirements. However, the Project is anticipated to generate 1,390 two-way trips per day, with 127 AM peak hour trips and 152 PM peak hour trips (actual vehicles). The proposed Project is anticipated to generate 1,756 two-way PCE trips per day on a typical weekday with approximately 150 AM PCE peak hour trips and 175 PM PCE peak hour trips, as shown in Table 4-2. For the purposes of the operations analysis, the PCE values shown in Table 4-2 will be utilized.

**TABLE 4-2: PROJECT TRIP GENERATION SUMMARY**

Land Use	Quantity Units <sup>1</sup>	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total	
<b>Actual Vehicles:</b>								
Building 1: Manufacturing	100.000 TSF							
Passenger Cars:		44	13	57	19	43	62	354
2-axle Trucks:		1	0	1	0	1	1	8
3-axle Trucks:		1	0	1	0	1	1	8
4+-axle Trucks:		2	1	3	1	2	3	26
Total Truck Trips (Actual Vehicles):		4	1	5	1	4	5	42
<b>Subtotal (Actual Vehicles)</b>		<b>48</b>	<b>14</b>	<b>62</b>	<b>20</b>	<b>47</b>	<b>67</b>	<b>396</b>
Building 1: High-Cube Fulfillment Center	350.000 TSF							
Passenger Cars:		28	8	36	14	36	50	614
2-4axle Trucks:		2	1	3	1	3	4	58
5+-axle Trucks:		3	1	4	1	3	4	76
Total Truck Trips (Actual Vehicles):		5	2	7	2	6	8	134
<b>Subtotal (Actual Vehicles)</b>		<b>33</b>	<b>10</b>	<b>43</b>	<b>16</b>	<b>42</b>	<b>58</b>	<b>748</b>
Building 2: Warehousing	139.971 TSF							
Passenger Cars:		16	5	21	6	17	23	178
2-axle Trucks:		0	0	0	0	0	0	12
3-axle Trucks:		0	0	0	0	1	1	14
4+-axle Trucks:		1	0	1	1	2	3	42
Total Truck Trips (Actual Vehicles):		1	0	1	1	3	4	68
<b>Subtotal (Actual Vehicles)</b>		<b>17</b>	<b>5</b>	<b>22</b>	<b>7</b>	<b>20</b>	<b>27</b>	<b>246</b>
Total Passenger Cars:		88	26	114	39	96	135	1,146
Total Trucks (Actual Vehicles):		10	3	13	4	13	17	244
<b>Total Trips (Actual Vehicles)<sup>2</sup></b>		<b>98</b>	<b>29</b>	<b>127</b>	<b>43</b>	<b>109</b>	<b>152</b>	<b>1,390</b>
<b>Passenger Car Equivalent (PCE):</b>								
Building 1: Manufacturing	100.000 TSF							
Passenger Cars:		44	13	57	19	43	62	354
2-axle Trucks:		1	0	1	0	1	1	10
3-axle Trucks:		2	0	2	1	1	2	16
4+-axle Trucks:		7	2	9	3	6	9	74
Total Truck Trips (PCE):		10	2	12	4	8	12	100
<b>Subtotal (PCE)</b>		<b>54</b>	<b>15</b>	<b>69</b>	<b>23</b>	<b>51</b>	<b>74</b>	<b>454</b>
Building 1: High-Cube Fulfillment Center	350.000 TSF							
Passenger Cars:		28	8	36	14	36	50	614
2-4axle Trucks:		4	1	5	2	6	8	114
5+-axle Trucks:		9	3	12	3	8	11	228
Total Truck Trips (PCE):		13	4	17	5	14	19	342
<b>Subtotal (PCE)</b>		<b>41</b>	<b>12</b>	<b>53</b>	<b>19</b>	<b>50</b>	<b>69</b>	<b>956</b>
Building 2: Warehousing	139.971 TSF							
Passenger Cars:		16	5	21	6	17	23	178
2-axle Trucks:		1	0	1	0	1	1	16
3-axle Trucks:		1	0	1	0	1	1	28
4+-axle Trucks:		4	1	5	2	5	7	124
Total Truck Trips (PCE):		6	1	7	2	7	9	168
<b>Subtotal (PCE)</b>		<b>22</b>	<b>6</b>	<b>28</b>	<b>8</b>	<b>24</b>	<b>32</b>	<b>346</b>
Total Passenger Cars:		88	26	114	39	96	135	1,146
Total Trucks (PCE):		29	7	36	11	29	40	610
<b>Total Trips (PCE)<sup>2</sup></b>		<b>117</b>	<b>33</b>	<b>150</b>	<b>50</b>	<b>125</b>	<b>175</b>	<b>1,756</b>

<sup>1</sup> TSF = thousand square feet

<sup>2</sup> Total Trips = Passenger Cars + Truck Trips.

## 4.2 PROJECT TRIP DISTRIBUTION

Trip distribution is the process of identifying the probable destinations, directions, or traffic routes that will be utilized by Project traffic. The potential interaction between the planned land uses and surrounding regional access routes are considered to identify the route where the Project traffic would distribute.

The Project trip distribution was developed based on anticipated travel patterns to and from the Project site for both passenger cars and truck traffic and are consistent with other similar projects that have been reviewed and approved by City of Perris staff. The truck trip distribution patterns have been developed based on the anticipated travel patterns for the warehousing trucks. The Project trip distribution patterns for both passenger cars and trucks were developed based on an understanding of existing travel patterns in the area, the geographical location of the site, and the site's proximity to the regional arterial and state highway system.

The Project passenger car trip distribution pattern is graphically depicted on Exhibit 4-1. The Project truck trip distribution pattern is graphically depicted on Exhibit 4-2. Each of these distribution patterns was reviewed and approved by the City of Perris as part of the traffic study scoping process (see Appendix 1.1).

## 4.3 MODAL SPLIT

The traffic reducing potential of public transit, walking, or bicycling have not been considered in this TA. Essentially, the traffic projections are "conservative" in that these alternative travel modes might be able to reduce the forecasted traffic volumes (employee trips only).

## 4.4 PROJECT TRIP ASSIGNMENT

The assignment of traffic from the Project area to the adjoining roadway system is based upon the Project trip generation, trip distribution, and the arterial highway and local street system improvements that would be in place by the time of initial occupancy of the Project. Based on the identified Project traffic generation and trip distribution patterns, Project (Phase 1) ADT and peak hour intersection turning movement volumes are shown on Exhibit 4-3 in actual vehicles and Project Buildout (Phase 1 & 2) ADT and peak hour intersection turning movement volumes are shown on Exhibit 4-4 in actual vehicles.

## 4.5 BACKGROUND TRAFFIC

Phase 1 future year traffic forecasts have been based upon two years of background (ambient) growth at 3% per year over 2 years, for 2023 traffic conditions. The total ambient growth is 6.09% for 2023 traffic conditions. Phase 1 and 2 future year traffic forecasts have been based upon four years of background (ambient) growth at 3% per year over 4 years, for 2025 traffic conditions. The total ambient growth is 12.55% for 2025 traffic conditions. This ambient growth rate is added to existing traffic volumes to account for area-wide growth not reflected by cumulative development projects.

EXHIBIT 4-1: PROJECT (PASSENGER CAR) TRIP DISTRIBUTION

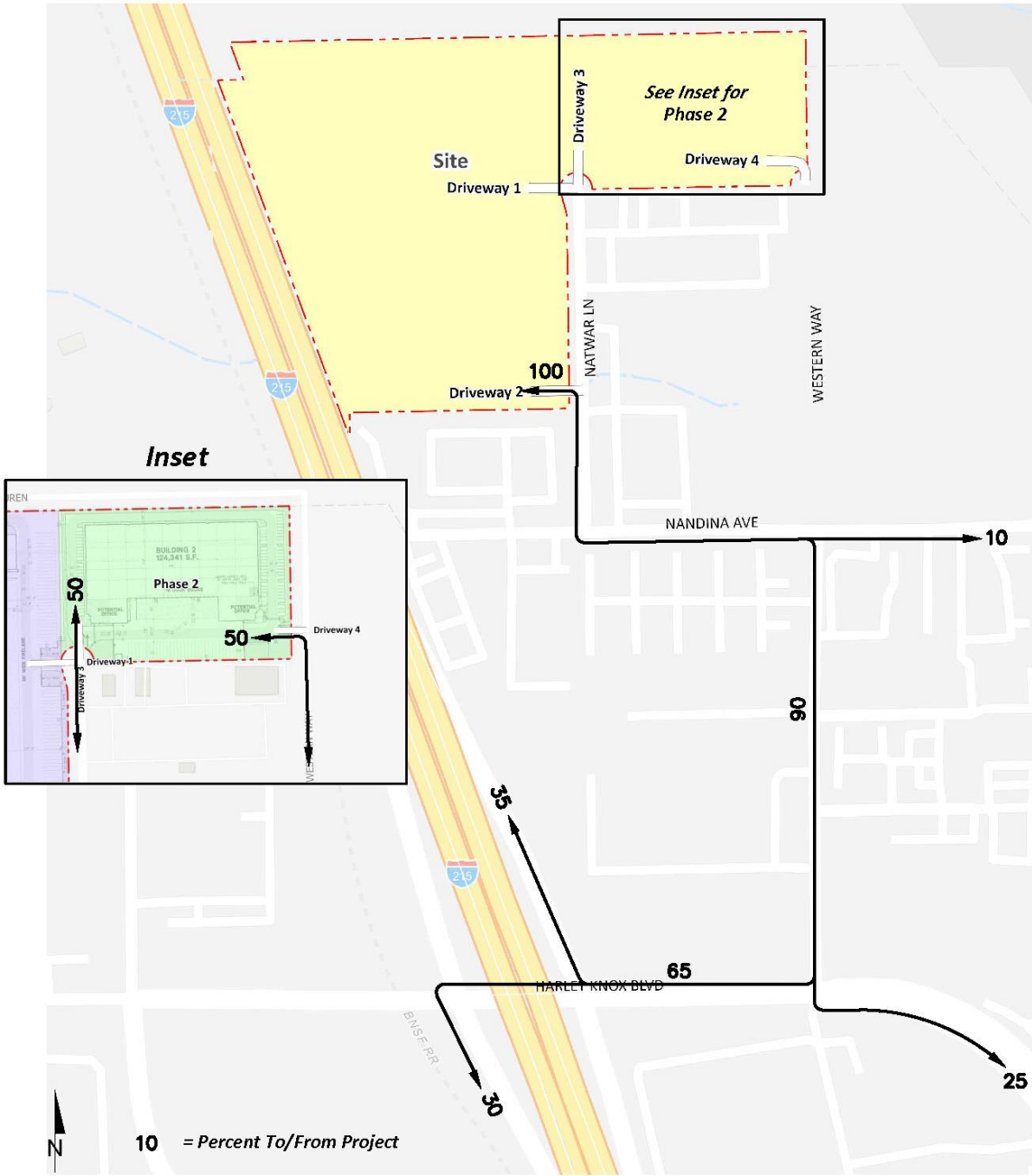
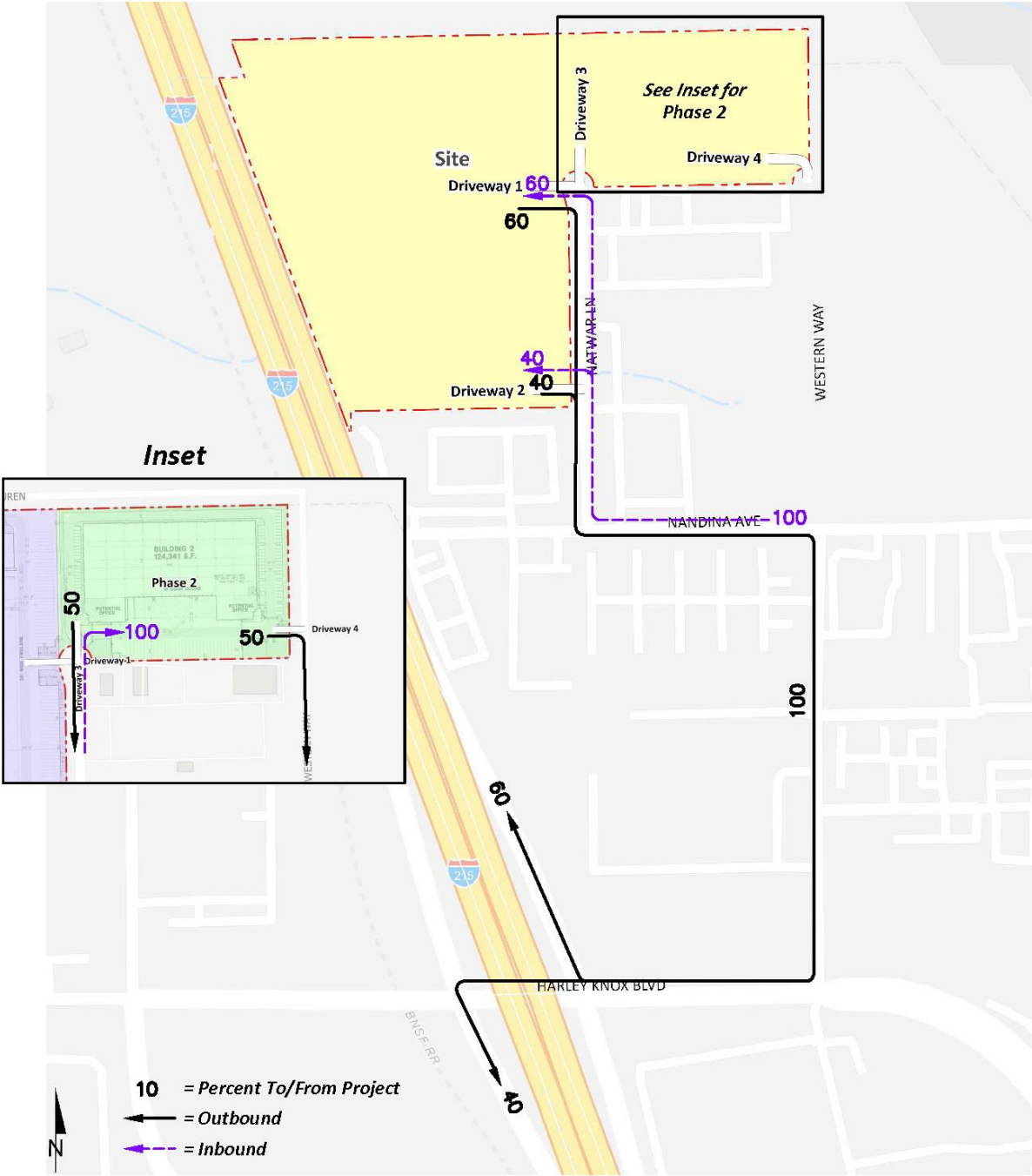


EXHIBIT 4-2: PROJECT (TRUCK) TRIP DISTRIBUTION



**EXHIBIT 4-3: PROJECT (PHASE 1) ONLY TRAFFIC VOLUMES (IN ACTUAL VEHICLES)**



1	2	3	4	5
<b>I-215 SB Ramps &amp; Harley Knox Bl.</b> 200 400 0(0) ↓ 0(0) ↓ 31(13) ↓ 0(0) ↑ 8(28) ↑ 0(0) → 0(0) ↓	<b>I-215 NB Ramps &amp; Harley Knox Bl.</b> 200 800 9(34) ↑ 8(28) ↑ 0(0) ↓ 31(13) → 0(0) ↑ 0(0) ↑ 25(11) ↑	<b>Natwar Ln./Driveway 3 &amp; Driveway 1</b> 0(0) ↓ 0(0) ↓ 0(0) ↓ 5(2) ↑ 0(0) ↑ 2(6) ↓	<b>Natwar Ln. &amp; Driveway 2</b> 100 0(0) ↓ 2(6) ↓ 0(0) ↓ 22(83) ↓ 76(34) → 5(2) ↑	<b>Natwar Ln. &amp; Nandina Av.</b> 1,150 1,150 0(0) ↓ 24(89) ↓ 81(36) ↑ 0(0) ↑ 0(0) ↓ 0(0) →
<b>Western Wy. &amp; Driveway 4</b> 6 4 Future Intersection	<b>Western Wy. &amp; Nandina Av.</b> 7 100 0(0) ↓ 0(0) ↓ 0(0) ↓ 0(0) ↑ 7(3) ↑ 0(0) ↑ 0(0) ↑ 2(8) → 22(81) ↓ 74(33) ↓ 0(0) ↑ 0(0) ↑	<b>Western Wy. &amp; Harley Knox Bl.</b> 8 1,050 250 17(61) ↓ 0(0) ↓ 0(0) ↓ 5(20) ↓ 18(8) ↑ 0(0) ↑ 0(0) ↑ 56(24) ↓ 0(0) → 0(0) → 0(0) ↓ 0(0) ↓ 0(0) ↓		

##(##) AM(PM) Peak Hour Intersection Volumes  
 ## Average Daily Trips

**EXHIBIT 4-3: PROJECT BUILDOUT (PHASE 1 & 2) ONLY TRAFFIC VOLUMES (IN ACTUAL VEHICLES)**



1	2	3	4	5																																								
I-215 SB Ramps & Harley Knox Bl.	I-215 NB Ramps & Harley Knox Bl.	Natwar Ln./Driveway 3 & Driveway 1	Natwar Ln. & Driveway 2	Natwar Ln. & Nandina Av.																																								
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##(##) AM(PM) Peak Hour Intersection Volumes  
 ## Average Daily Trips

Ambient growth has been added to daily and peak hour traffic volumes on surrounding roadways, in addition to traffic generated by the development of future projects that have been approved but not yet built and/or for which development applications have been filed and are under consideration by governing agencies.

The Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) growth forecasts for the City of Perris identifies projected growth in population of 74,900 in 2016 to 121,000 in 2045, or a 61.6% increase over the 29-year period. The change in population equates to roughly a 1.67 percent growth rate compounded annually. Similarly, growth over the same 29-year period in households is projected to increase by 96.5 percent, or 2.36 percent growth rate, compounded annually. Finally, growth in employment over the same 29-year period is projected to increase by 64.0 percent, or a 1.72 percent annual growth rate. The average annual growth rate between population, households, and employment is 1.92 percent per year. (11) Therefore, the use of an annual growth rate of 3.0 percent would appear to conservatively approximate the anticipated regional growth in traffic volumes in the City of Perris, especially when considered along with the addition of Project-related traffic and traffic generated by other known development projects. As such, the growth in traffic volumes assumed in this traffic analysis would tend to overstate as opposed to understate the potential deficiencies to traffic and circulation.

#### **4.6 CUMULATIVE DEVELOPMENT TRAFFIC**

Other reasonably foreseeable development projects which are either approved or being processed concurrently in the study area have also been included as part of a cumulative analysis scenario. A cumulative project list was developed for the purposes of this analysis through consultation with planning and engineering staff from the City of Perris. The cumulative project list includes known and foreseeable projects that are anticipated to contribute traffic to the study area intersections. The adjacent jurisdiction of the County of Riverside has also been contacted to obtain the most current list of cumulative projects from their respective jurisdictions.

Where applicable, cumulative projects anticipated to contribute measurable traffic (i.e., 50 or more peak hour trips) to study area intersections have been manually added to the study area network to generate EAC and EAPC forecasts. In other words, this list of cumulative development projects has been reviewed to determine which projects would likely contribute measurable traffic through the study area intersections (e.g., those cumulative projects in close proximity to the proposed Project). For the purposes of this analysis, the cumulative projects that were determined to affect one or more of the study area intersections are shown on Exhibit 4-5, listed in Table 4-3, and have been considered for inclusion.

EXHIBIT 4-5: CUMULATIVE DEVELOPMENT LOCATION MAP

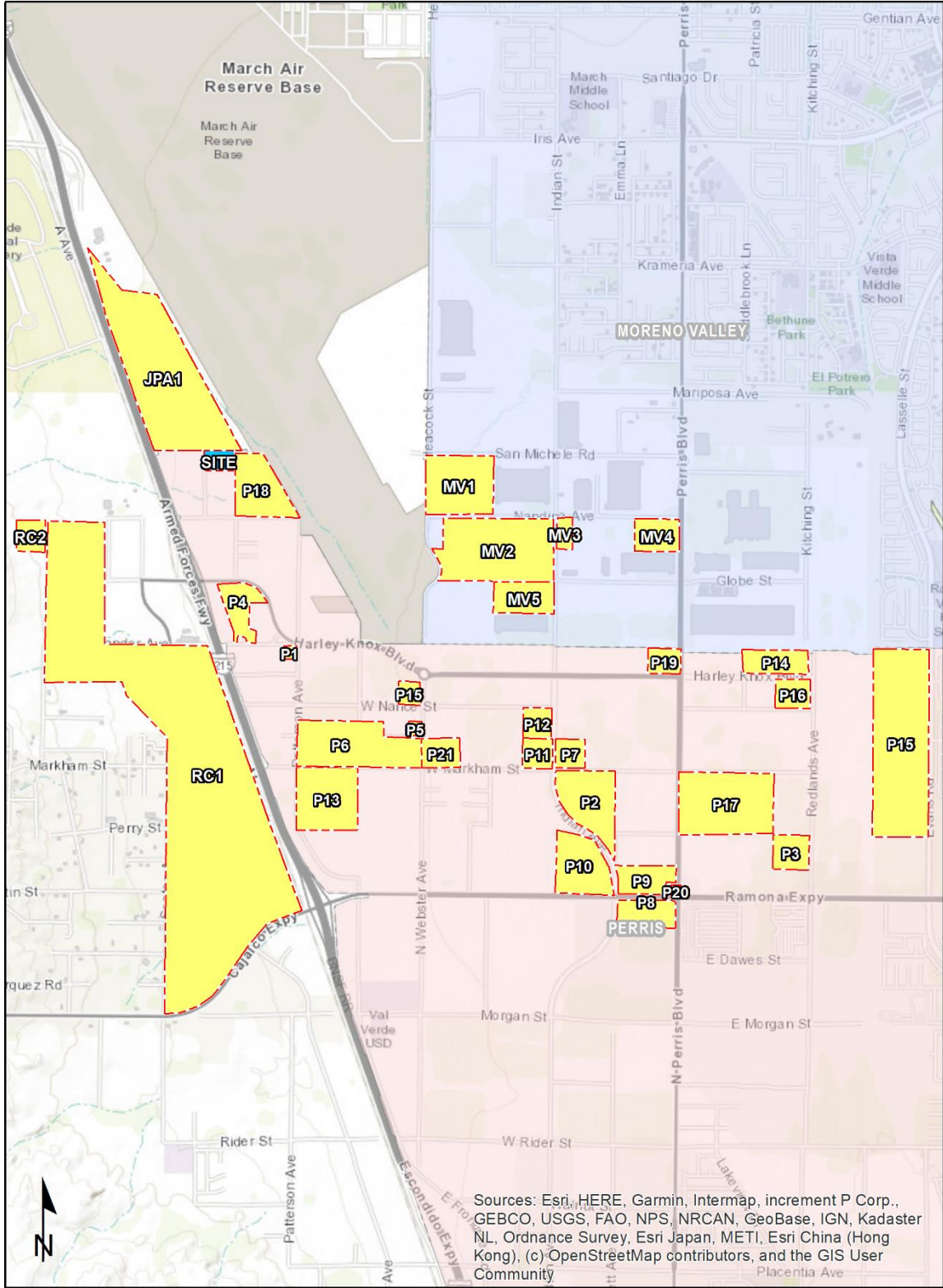


TABLE 4-3: CUMULATIVE DEVELOPMENT LAND USE SUMMARY

No.	Project Name / Case Number	Jurisdiction	Land Use <sup>1</sup>	Quantity Units <sup>2</sup>	Location
P1	Canyon Steel (CS)	Perris	Industrial	25.000 TSF	NWC OF PATTERSON AVE. & CALFORNIA AVE.
P2	Duke 2 / DPR 16-00008	Perris	High-Cube Warehouse	669.000 TSF	NEC OF INDIAN AVE. & MARKHAM ST.
P3	First Perry / DPR 16-00013	Perris	High-Cube Warehouse	240.000 TSF	SWC OF REDLANDS AVE. & PERRY ST.
P4	Gateway / DPR 16-00003	Perris	High-Cube Warehouse	400.000 TSF	SOUTH OF HARLEY KNOX BLVD. EAST OF HWY. 215
P5	Marijuana Manufacturing (MM)	Perris	Industrial	1.000 TSF	NW CORNER OF WEBSTER AVE. & WASHINGTON ST.
P6	OLC2 / DPR 14-01-0015	Perris	High-Cube Warehouse	1,037.000 TSF	WEST OF WEBSTER AVE. NORTH OF MARKHAM ST.
P7	Markham Industrial / DPR 16-00015	Perris	Warehousing	170.000 TSF	NEC OF INDIAN AVE. & MARKHAM ST.
P8	Perris and Ramona Warehouse	Perris	Industrial	347.938 TSF	S SIDE OF RAMONA EXWY. BTW INDIAN AVE. & PERRIS BLVD.
P9	JM Realty	Perris	High-Cube Fulfillment	232.575 TSF	NEC INDIAN AVE. & RAMONA EXWY.
			Hotel	125 RM	
P10	Indian/Ramona Warehouse / DPR 18-00002	Perris	High-Cube Warehouse	428.730 TSF	NORTH OF RAMONA EXWY. WEST OF INDIAN AVE.
P11	Phelan Indus	Perris	Industrial	81.000 TSF	N SIDE OF MARKHAM BTW WEBSTER AVE. & PERRIS BLVD.
P12	Westcoast Textile / DPR 16-00001	Perris	Warehousing	180.000 TSF	SWC OF INDIAN ST. & NANCE ST.
P13	Duke at Patterson / DPR 17-00001	Perris	High-Cube Warehouse	811.000 TSF	SEC OF PATTERSON AVE. & MARKHAM ST.
P14	Harley Knox Commerce Park / DPR 16-004	Perris	High-Cube Warehouse	386.278 TSF	NWC OF HARLEY KNOX BLVD. & REDLANDS AVE.
P15	AAA	Perris	Industrial	2.000 TSF	SE CORNER OF HARLEY KNOX BL. & WEBSTER AVE.
P16	Circle Industrial III	Perris	Warehousing	211.000 TSF	NWC OF REDLANDS AVE. AND NANCE AVE.
P17	Duke @ Perris Blvd.	Perris	High-Cube Warehouse	1,070.000 TSF	SEC OF PERRIS BL. AND MARKHAM ST.
P18	Western Industrial / DRP 19-00003	Perris	High-Cube Warehouse	250.000 TSF	NEC OF WESTERN WY. AND NANDINA AVE.
P19	March Plaza / CUP16-05165	Perris	Commercial Retail	47.253 TSF	NWC OF PERRIS BL. AND HARLEY KNOX BL.
P20	Cali Express Carwash / CUP 16-05258	Perris	Carwash	5.600 TSF	NWC OF PERRIS BL. AND RAMONA EXWY.
P21	Integra Expansion / MMOD 17-05075	Perris	High-Cube Warehouse	273.000 TSF	NCE OF MARKHAM ST. AND WEBSTER AVE.
MV1	IDS	Moreno Valley	High-Cube Warehouse	701.000 TSF	SEC OF HEACOCK ST. & SAN MICHELE RD.
MV2	First Industrial	Moreno Valley	High-Cube Warehouse	1,380.000 TSF	SWC OF INDIAN AVE. & NANDINA AVE.
MV3	Phelan Development	Moreno Valley	High-Cube Warehouse	98.210 TSF	SEC OF INDIAN ST. & NANDINA AVE.
MV4	Nandina Industrial Center	Moreno Valley	High-Cube Warehouse	335.970 TSF	SOUTH OF NANDINA AVE. WEST OF PERRIS BLVD.
MV5	Indian Street Commerce Center	Moreno Valley	High-Cube Warehouse	433.920 TSF	SWC OF INDIAN ST. & GROVEVIEW RD.
JPA1	VIP 215	March JPA	High-Cube Warehouse	2,219.850 TSF	NORTH OF NANDINA AVE. EAST OF HWY. 215
RC1	Majestic Freeway Business Center SP	Riverside County	General Light Industrial	6,200.000 TSF	NORTH OF RAMONA EXWY. SOUTH OF NANDINA AVE.
RC2	Oleander Business Park	Riverside County	High-Cube Warehouse	728.650 TSF	NWC OF DECKER RD. & OLEANDER AVE.

<sup>1</sup> SFDR = Single Family Detached Residential<sup>2</sup> DU = Dwelling Units; TSF = Thousand Square Feet

Although it is unlikely that these cumulative projects would be fully built and occupied by Year 2023 or 2025, they have been included in an effort to conduct a conservative analysis and overstate as opposed to understate potential traffic deficiencies. Any other cumulative projects that are not expected to contribute measurable traffic to study area intersections have not been included since the traffic would dissipate due to the distance from the Project site and study area intersections. Any additional traffic generated by other projects not on the cumulative projects list is accounted for through background ambient growth factors that have been applied to the peak hour volumes at study area intersections as discussed in Section 4.5 *Background Traffic*. Cumulative Only ADT and peak hour intersection turning movement volumes are shown on Exhibit 4-6 in actual vehicles.

**EXHIBIT 4-6: CUMULATIVE ONLY TRAFFIC VOLUMES (IN ACTUAL VEHICLES)**



1	I-215 SB Ramps & Harley Knox Bl.	2	I-215 NB Ramps & Harley Knox Bl.	3	Natwar Ln./Driveway 3 & Driveway 1	4	Natwar Ln. & Driveway 2	5	Natwar Ln. & Nandina Av.
6,600	10,450	6,450	15,250	Future Intersection		Future Intersection		0	0
136(73) ↓ 0(0) ↓ 370(222) ↓ ← 74(47) ↗ 77(288)	61(163) ↘ 390(252) → 48(25) ↗ 0(0) ↗ 261(97) ↗							0(0) ↓ 0(0) ↓ 0(0) ↘ 0(0) →	
5,400	3,150	10,450	3,050	Future Intersection		Future Intersection		0	
6	Western Wy. & Driveway 4	7	Western Wy. & Nandina Av.	8	Western Wy. & Harley Knox Bl.				
Future Intersection		2,200	400	2,500	13,600				
		0(0) ↓ 25(85) ↓ 0(1) ↓ ↗ 5(14)	0(0) ↗ 0(0) ↗ 0(0) ↗ 78(35) ↗ 15(6) ↗	22(83) ↓ 0(0) ↓ 6(23) ↓ ↗ 18(10) ↗ 243(747) ↗ 12(2)	74(36) ↘ 569(312) → 9(1) ↘ 1(3) ↗ 0(0) ↗ 2(4) ↗				
		0	2,550	15,250	100				

##(##) AM(PM) Peak Hour Intersection Volumes  
 ## Average Daily Trips

## 4.7 NEAR-TERM TRAFFIC CONDITIONS

The “buildup” approach combines existing traffic counts with a background ambient growth factor to forecast EAC (2023), EAPC (2023), EAC (2025), and EAPC (2025) traffic conditions. An ambient growth factor of 6.09% to account for background (area-wide) traffic increases that occur over time up to the year 2023 from the year 2021 (3.0 percent per year, compounded annually). Furthermore, an ambient growth factor of 12.55% to account for background (area-wide) traffic increases that occur over time up to the year 2025 from the year 2021 (3.0 percent per year, compounded annually). Traffic volumes generated by the Project are then added to assess the near-term traffic conditions. The 2023 and 2025 roadway networks are similar to the Existing conditions roadway network, with the exception of future driveways proposed to be developed by the Project.

The near-term traffic analysis includes the following traffic conditions, with the various traffic components:

- **Existing Plus Ambient Growth Plus Cumulative (2023)**
  - Adjusted Existing 2021
  - Ambient growth traffic (6.09%)
  - Cumulative Development traffic
- **Existing Plus Ambient Growth Plus Cumulative Plus Project (2023)**
  - Adjusted Existing 2021
  - Ambient growth traffic (6.09%)
  - Cumulative Development traffic
  - Project Phase 1 traffic
- **Existing Plus Ambient Growth Plus Cumulative (2025)**
  - Adjusted Existing 2021
  - Ambient growth traffic (12.55%)
  - Cumulative Development traffic
- **Existing Plus Ambient Growth Plus Cumulative Plus Project (2025)**
  - Adjusted Existing 2021
  - Ambient growth traffic (12.55%)
  - Cumulative Development traffic
  - Project Phase 1 and 2 traffic

The EAPC (2025) traffic conditions analyses was utilized to determine if improvements funded through regional transportation mitigation fee programs, such as the TUMF, can accommodate the long-range traffic at the target LOS identified in the City of Perris General Plan.

## 5 E+P TRAFFIC CONDITIONS

This section discusses the traffic forecasts for Existing Plus Project (E+P) conditions and the resulting intersection operations, traffic signal warrant, and off-ramp queuing analyses.

### 5.1 ROADWAY IMPROVEMENTS

The lane configurations and traffic controls assumed to be in place for E+P conditions are consistent with those shown previously on Exhibit 3-1, with the exception of the following:

- Project driveways and those facilities assumed to be constructed by the Project to provide site access are also assumed to be in place for E+P conditions only (e.g., intersection and roadway improvements at the Project's frontage and driveways).

### 5.2 E+P (PHASE 1) TRAFFIC VOLUME FORECASTS

This scenario includes Existing traffic volumes plus Project (Phase 1) traffic. The ADT and peak hour intersection turning movement volumes (in actual vehicles), which can be expected for E+P (Phase 1) traffic conditions are shown on Exhibit 5-1.

### 5.3 E+P (PHASE 1 & 2) TRAFFIC VOLUME FORECASTS

This scenario includes Existing traffic volumes plus Project Buildout (Phase 1 & 2) traffic. The ADT and peak hour intersection turning movement volumes (in actual vehicles), which can be expected for E+P (Phase 1 & 2) traffic conditions are shown on Exhibit 5-2.

### 5.4 INTERSECTION OPERATIONS ANALYSIS

E+P peak hour traffic operations have been evaluated for the study area intersections based on the analysis methodologies presented in Section 2 *Methodologies* of this TA. The intersection analysis results are summarized in Table 5-1, which indicates that the study area intersections are anticipated to continue to operate at an acceptable LOS during the peak hours, consistent with Existing (2021) traffic conditions. The E+P (Phase 1) and E+P (Phase 1 & 2) intersection operations analysis worksheets are included in Appendices 5.1 and 5.2 of this TA, respectively.

**TABLE 5-1: INTERSECTION ANALYSIS FOR E+P CONDITIONS**

# Intersection	Traffic Control <sup>1</sup>	Existing				E+P (Ph. 1)				E+P (Ph. 1 & 2)			
		Delay <sup>2</sup> (secs.)		Level of Service		Delay <sup>2</sup> (secs.)		Level of Service		Delay <sup>2</sup> (secs.)		Level of Service	
		AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
1 I-215 SB Ramps & Harley Knox Bl.	TS	18.9	24.9	B	C	21.1	34.5	C	C	21.6	36.9	C	D
2 I-215 NB Ramps & Harley Knox Bl.	TS	49.5	12.3	D	B	52.7	13.7	D	B	53.2	14.0	D	B
3 Natwar Ln./Driveway 3 & Driveway 1	<b>CSS</b>	Does Not Exist				8.3	8.3	A	A	8.3	8.4	A	A
4 Natwar Ln. & Driveway 2	<b>CSS</b>	Does Not Exist				8.5	8.7	A	A	8.5	8.8	A	A
5 Natwar Ln. & Nandina Av.	CSS	8.7	8.7	A	A	9.2	9.4	A	A	9.2	9.5	A	A
6 Western Wy. & Driveway 4	<b>CSS</b>	Does Not Exist				Does Not Exist				8.3	8.3	A	A
7 Western Wy. & Nandina Av.	AWS	7.4	6.8	A	A	8.3	7.3	A	A	8.5	7.5	A	A
8 Western Wy. & Harvey Knox Bl.	TS	11.2	6.8	B	A	13.2	9.3	B	A	14.0	9.6	B	A

<sup>1</sup> AWS = All-way Stop; CSS = Cross-street Stop; TS = Traffic Signal; **CSS** = Improvement

<sup>2</sup> Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

### 5.5 TRAFFIC SIGNAL WARRANTS ANALYSIS

There are no study area intersections anticipated to meet peak hour volume-based or planning level (ADT) traffic signal warrants under E+P (Phase 1) and E+P (Phase 1 & 2) traffic conditions (see Appendices 5.3 & 5.4, respectively).

### 5.6 OFF-RAMP QUEUING ANALYSIS

E+P peak hour off-ramp queuing has been evaluated for the study area intersections based on the analysis methodologies presented in Section 2 *Methodologies* of this TA. As shown in Table 5-2, there are no off-ramp movements that are anticipated to experience queuing issues during the weekday AM or weekday PM peak 95<sup>th</sup> percentile traffic flows. Worksheets for E+P (Phase 1) and E+P (Phase 1 & 2) traffic conditions off-ramp queuing analysis are provided in Appendices 5.5 and 5.6, respectively.

**TABLE 5-2: PEAK HOUR FREEWAY OFF-RAMP QUEUING SUMMARY FOR E+P CONDITIONS**

#	Intersection	Movement	Available Stacking Distance (Feet)	Existing (2021)				E+P (Ph. 1)				E+P (Ph. 1 & 2)			
				95th Percentile Queue (Feet)		Acceptable? <sup>1</sup>		95th Percentile Queue (Feet)		Acceptable? <sup>1</sup>		95th Percentile Queue (Feet)		Acceptable? <sup>1</sup>	
				AM Peak Hour	PM Peak Hour	AM	PM	AM Peak Hour	PM Peak Hour	AM	PM	AM Peak Hour	PM Peak Hour	AM	PM
1	I-215 Southbound Ramps & Harley Knox Bl.	SBL/T	1,330	351	216	Yes	Yes	392	229	Yes	Yes	409 <sup>2</sup>	230	Yes	Yes
		SBR	270	41	35	Yes	Yes	41	35	Yes	Yes	41	35	Yes	Yes
2	I-215 Northbound Ramps & Harley Knox Bl.	NBL/T	1,120	23	29	Yes	Yes	22	31	Yes	Yes	23	32	Yes	Yes
		NBR	265	28	53	Yes	Yes	45	57	Yes	Yes	49	58	Yes	Yes

<sup>1</sup> Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

<sup>2</sup> 95th percentile volume exceeds capacity, queue may be longer. Queue shown is maximum after two cycles.

**EXHIBIT 5-1: E+P (PHASE 1) TRAFFIC VOLUMES (IN ACTUAL VEHICLES)**



1	2	3	4	5																																																										
I-215 SB Ramps & Harley Knox Bl.	I-215 NB Ramps & Harley Knox Bl.	Natwar Ln./Driveway 3 & Driveway 1	Natwar Ln. & Driveway 2	Natwar Ln. & Nandina Av.																																																										
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##(##) AM(PM) Peak Hour Intersection Volumes  
 ## Average Daily Trips

EXHIBIT 5-2: E+P (PHASE 1 & 2) TRAFFIC VOLUMES (IN ACTUAL VEHICLES)



1	2	3	4	5
<b>I-215 SB Ramps &amp; Harley Knox Bl.</b> 8,250 147(129) 1(0) 347(259) 196(194) 118(352) 690(362) 4(31) 15,300	<b>I-215 NB Ramps &amp; Harley Knox Bl.</b> 24,400 15,200 34,950 854(523) 309(527) 412(213) 625(407) 5(19) 3(3) 63(235) 7,700 24,350	<b>Natwar Ln./Driveway 3 &amp; Driveway 1</b> 150 0(0) 3(10) 0(0) 5(2) 9(4) 2(6) 100 5,450	<b>Natwar Ln. &amp; Driveway 2</b> 250 0(0) 18(17) 0(0) 76(34) 21(6) 22(83) 250 1,050	<b>Natwar Ln. &amp; Nandina Av.</b> 1,300 0(0) 41(100) 97(40) 8(5) 6(38) 1,300 900 2,250
<b>Western Wy. &amp; Driveway 4</b> 0 0(0) 0(0) 0(0) 8(3) 0(0) 3(10) 100	<b>Western Wy. &amp; Nandina Av.</b> 100 2(9) 0(1) 1(0) 20(8) 5(10) 12(13) 60(143) 119(40) 7(3) 8(4) 2,800 2,700	<b>Western Wy. &amp; Harley Knox Bl.</b> 600 4,250 59(163) 199(48) 76(23) 1103(883) 162(42) 523(596) 2(4) 1(4) 34,950 150		

##(##) AM(PM) Peak Hour Intersection Volumes  
 ## Average Daily Trips



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## 6 EAC AND EAPC (2023) TRAFFIC CONDITIONS

This section discusses the methods used to develop EAC and EAPC (2023) traffic forecasts and the resulting intersection operations, traffic signal warrant, and off-ramp queuing analyses.

### 6.1 ROADWAY IMPROVEMENTS

The lane configurations and traffic controls assumed to be in place for EAC and EAPC (2023) conditions are consistent with those shown previously on Exhibit 3-1, with the exception of the following:

- Project driveways and those facilities assumed to be constructed by the Project (Phase 1) to provide site access are also assumed to be in place for EAPC conditions only (e.g., intersection and roadway improvements along the Project's frontage and driveways).
- Driveways and those facilities assumed to be constructed by cumulative developments to provide site access are also assumed to be in place for EAC and EAPC (2023) conditions only (e.g., intersection and roadway improvements along the cumulative development's frontages).

### 6.2 EAC (2023) TRAFFIC VOLUME FORECASTS

To account for background traffic, other known cumulative development projects in the study area were included in addition to 6.09% of ambient growth for EAC (2023) traffic conditions. The weekday ADT and weekday AM and PM peak hour volumes (in actual vehicles) which can be expected for EAC (2023) traffic conditions are shown on Exhibit 6-1.

### 6.3 EAPC (2023) TRAFFIC VOLUME FORECASTS

To account for background traffic, other known cumulative development projects in the study area were included in addition to 6.09% of ambient growth for EAPC (2023) traffic conditions in conjunction with traffic associated with the proposed Project (Phase 1). The weekday ADT and weekday AM and PM peak hour volumes (in actual vehicles) which can be expected for EAPC (2023) traffic conditions are shown on Exhibit 6-2.

**EXHIBIT 6-1: EAC (2023) TRAFFIC VOLUMES (IN ACTUAL VEHICLES)**



1	2	3	4	5
I-215 SB Ramps & Harley Knox Bl.	I-215 NB Ramps & Harley Knox Bl.	Natwar Ln./Driveway 3 & Driveway 1	Natwar Ln. & Driveway 2	Natwar Ln. & Nandina Av.
12,400 238(181) ↓ 1(0) ↓ 551(391) ↓ 252(234) ← 162(510) ↑ 781(500) → 17(66) → 19,500	31,600 19,700 474(324) → 858(566) → 31,600 9,800	45,150 992(825) ↑ 380(709) ← 34(35) ↓ 3(3) ↓ 192(294) ↑ 7,350 Future Intersection	Future Intersection	1,000 0(0) ↓ 15(1) ↓ 7(0) ↑ 8(5) ← 0(0) ↓ 6(40) → 1,000
6	7	8		
Western Wy. & Driveway 4	Western Wy. & Nandina Av.	Western Wy. & Harley Knox Bl.		
Future Intersection	1,350 0(0) ↓ 15(51) ↓ 0(1) ↓ 1(0) ↑ 13(4) ↑ 8(19) ↑ 0(0) ↓ 11(4) → 38(56) ↓ 39(4) ↓ 47(21) ↑ 17(8) ↑ 1,500	750 4,650 55(143) ↓ 0(0) ↓ 207(39) ↓ 145(35) ↓ 896(819) → 8(5) ↓ 2(6) ↓ 0(0) ↓ 1(2) ↓ 42,550 3,150 45,150 250		

##(##) AM(PM) Peak Hour Intersection Volumes  
 ## Average Daily Trips

**EXHIBIT 6-2: EAPC (2023) TRAFFIC VOLUMES (IN ACTUAL VEHICLES)**



1	2	3	4	5
<b>I-215 SB Ramps &amp; Harley Knox Bl.</b> 12,650 238(181) ↓ 1(0) ↓ 582(404) ↑ 252(234) 170(538) 781(500) → 17(66) ↓ 19,500	<b>I-215 NB Ramps &amp; Harley Knox Bl.</b> 32,000 19,950 ↑ 1001(859) ↑ 388(737) 474(324) ↓ 889(579) → 34(35) ↓ 3(3) ↑ 217(305) ↓ 7,550	<b>Natwar Ln./Driveway 3 &amp; Driveway 1</b> 0 ↓ 0(0) ↓ 0(0) 0(0) ↓ 2(6) → 5(2) ↑ 0(0) ↑ 100	<b>Natwar Ln. &amp; Driveway 2</b> 150 ↓ 0(0) ↓ 17(7) 0(0) ↓ 22(83) ↓ 76(34) ↑ 12(2) ↑ 100	<b>Natwar Ln. &amp; Nandina Av.</b> 1,150 2,150 ↓ 0(0) ↓ 39(90) ↑ 88(36) ↑ 8(5) 0(0) ↓ 6(40) → 1,150
<b>6 Western Wy. &amp; Driveway 4</b> 10,000	<b>7 Western Wy. &amp; Nandina Av.</b> 32,000 1,350 0(0) ↓ 15(51) ↓ 0(1) ↓ 0(0) ↓ 13(12) ↓ 60(137) ↓ 2,600	<b>8 Western Wy. &amp; Harley Knox Bl.</b> 850 5,700 72(204) ↓ 0(0) ↓ 212(59) ↓ 201(59) ↓ 896(819) ↓ 8(5) ↓ 46,000	<b>Future Intersection</b> 42,800 ↑ 86(28) ↑ 1316(1385) 7(1) ↑ 2(6) ↓ 0(0) ↓ 1(2) ↓ 250	1,050 1,150 1,000

##(##) AM(PM) Peak Hour Intersection Volumes  
 ## Average Daily Trips

### 6.4 INTERSECTION OPERATIONS ANALYSIS

LOS calculations were conducted for the study intersections to evaluate their operations under EAC (2023) conditions with roadway and intersection geometrics consistent with Section 6.1 *Roadway Improvements*. As shown in Table 6-1, all the study area intersections are anticipated to operate at acceptable LOS during the peak hours under EAC and EAPC (2023) traffic conditions, with the exception of the following intersections:

- I-215 SB Ramps & Harley Knox Bl. (#1) – LOS F PM peak hour only
- I-215 NB Ramps & Harley Knox Bl. (#2) – LOS F AM and PM peak hours

The intersection operations analysis worksheets for EAC and EAPC (2023) traffic conditions are included in Appendix 6.1 and Appendix 6.2 of this TA, respectively.

**TABLE 6-1: INTERSECTION ANALYSIS FOR EAC & EAPC (2023) CONDITIONS**

# Intersection	Traffic Control <sup>1</sup>	EAC (2023)				EAPC (2023)			
		Delay <sup>2</sup> (secs.)		Level of Service		Delay <sup>2</sup> (secs.)		Level of Service	
		AM	PM	AM	PM	AM	PM	AM	PM
1 I-215 SB Ramps & Harley Knox Bl.	TS	47.2	<b>140.8</b>	D	F	54.1	<b>165.8</b>	D	F
2 I-215 NB Ramps & Harley Knox Bl.	TS	<b>132.7</b>	<b>87.7</b>	F	F	<b>138.9</b>	<b>97.1</b>	F	F
3 Natwar Ln./Driveway 3 & Driveway 1	<b>CSS</b>	Does Not Exist				8.3	8.3	A	A
4 Natwar Ln. & Driveway 2	<b>CSS</b>	Does Not Exist				8.5	8.7	A	A
5 Natwar Ln. & Nandina Av.	CSS	8.7	8.8	A	A	9.2	9.4	A	A
6 Western Wy. & Driveway 4	<b>CSS</b>	Does Not Exist				Does Not Exist			
7 Western Wy. & Nandina Av.	AWS	7.9	7.3	A	A	8.9	7.8	A	A
8 Western Wy. & Harvey Knox Bl.	TS	14.4	10.9	B	B	18.4	12.5	B	B

\* **BOLD** = Level of Service (LOS) does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).  
<sup>1</sup> AWS = All-way Stop; CSS = Cross-street Stop; TS = Traffic Signal; **CSS** = Improvement  
<sup>2</sup> Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

### 6.5 TRAFFIC SIGNAL WARRANTS ANALYSIS

Traffic signal warrants have been performed for EAC and EAPC (2023) traffic conditions based on peak hour volumes and daily traffic (ADT). No traffic signals are warranted at the study area intersections (see Appendices 6.3 and 6.4).

## 6.6 OFF-RAMP QUEUING ANALYSIS

EAC and EAPC (2023) peak hour off-ramp queuing has been evaluated for the study area intersections based on the analysis methodologies presented in Section 2 *Methodologies* of this TA. As shown in Table 6-2, there are no off-ramp movements that are anticipated to experience queuing issues during the weekday AM or weekday PM peak 95<sup>th</sup> percentile traffic flows. Worksheets for EAC and EAPC (2023) traffic conditions off-ramp queuing analysis are provided in Appendices 6.5 and 6.6, respectively.

## 6.7 RECOMMENDED IMPROVEMENTS

Improvement strategies have been recommended at intersections that have been identified as deficient under EAPC (2023) traffic conditions in an effort to achieve an acceptable LOS (i.e., LOS E or better).

The effectiveness of the recommended improvement strategies to address EAPC (2023) traffic deficiencies are presented in Table 6-3. Worksheets for EAPC (2023) conditions, with improvements, HCM calculation worksheets are provided in Appendix 6.7. The EAPC (2023) off-ramp queuing, with improvements, are presented in Table 6-4. Worksheets EAPC (2023) traffic conditions, with improvements, off-ramp queuing analysis are provided in Appendix 6.8.

**TABLE 6-2: PEAK HOUR FREEWAY OFF-RAMP QUEUING SUMMARY FOR EAC AND EAPC (2023) CONDITIONS**

# Intersection	Movement	Available Stacking Distance (Feet)	EAC (2023)				EAPC (2023)			
			95th Percentile Queue (Feet)		Acceptable? <sup>1</sup>		95th Percentile Queue (Feet)		Acceptable? <sup>1</sup>	
			AM Peak Hour	PM Peak Hour	AM	PM	AM Peak Hour	PM Peak Hour	AM	PM
1 I-215 Southbound Ramps & Harley Knox Bl.	SBL/T	1,330	762 <sup>2</sup>	342	Yes	Yes	829 <sup>2</sup>	359	Yes	Yes
	SBR	270	92	38	Yes	Yes	95	39	Yes	Yes
2 I-215 Northbound Ramps & Harley Knox Bl.	NBL/T	1,120	61	70	Yes	Yes	61	70	Yes	Yes
	NBR	265	130 <sup>2</sup>	175 <sup>2</sup>	Yes	Yes	203 <sup>2</sup>	214 <sup>2</sup>	Yes	Yes

<sup>1</sup> Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

<sup>2</sup> 95th percentile volume exceeds capacity, queue may be longer. Queue shown is maximum after two cycles.

**TABLE 6-3: INTERSECTION ANALYSIS FOR EAC & EAPC (2023) CONDITIONS WITH IMPROVEMENTS**

# Intersection	Traffic Control <sup>1</sup>	Intersection Approach Lanes <sup>2</sup>												Delay <sup>3</sup> (secs.)		Level of Service		
		Northbound			Southbound			Eastbound			Westbound			AM	PM	AM	PM	
		L	T	R	L	T	R	L	T	R	L	T	R					
1 I-215 SB Ramps & Harley Knox Bl.																		
-Without Improvements	TS	0	0	0	0	1	1	0	2	d	1	2	0	54.1	165.8	D	F	
- With Improvements <sup>4</sup>	TS	0	0	0	0	1	1	0	2	d	<u>2</u>	<u>1</u>	0	36.5	22.9	D	C	
2 I-215 NB Ramps & Harley Knox Bl.																		
-Without Improvements	TS	0	1	1	0	0	0	1	2	0	0	2	1	138.9	97.1	F	F	
- With Improvements <sup>4</sup>	TS	0	1	1	0	0	0	<u>2</u>	2	0	0	2	<u>1&gt;&gt;</u>	10.9	10.5	B	B	

\* **BOLD** = Level of Service (LOS) does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

<sup>1</sup> TS = Traffic Signal

<sup>2</sup> When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; d = Defacto Right Turn Lane; 1 = Improvement

<sup>3</sup> Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are

<sup>4</sup> Per the City of Perris General Plan, LOS E is permitted at intersections along the I-215 Ramps.

**TABLE 6-4: PEAK HOUR FREEWAY OFF-RAMP QUEUING SUMMARY FOR EAC & EAPC (2023) CONDITIONS WITH IMPROVEMENTS**

# Intersection	Movement	Available Stacking Distance (Feet)	Without Improvements				With Improvements			
			95th Percentile Queue (Feet)		Acceptable? <sup>1</sup>		95th Percentile Queue (Feet)		Acceptable? <sup>1</sup>	
			AM Peak Hour	PM Peak Hour	AM	PM	AM Peak Hour	PM Peak Hour	AM	PM
1 I-215 Southbound Ramps & Harley Knox Bl.	SBL/T	1,330	829 <sup>2</sup>	359	Yes	Yes	731 <sup>2</sup>	461	Yes	Yes
	SBR	270	95	39	Yes	Yes	43	43	Yes	Yes
2 I-215 Northbound Ramps & Harley Knox Bl.	NBL/T	1,120	61	70	Yes	Yes	38	40	Yes	Yes
	NBR	265	203 <sup>2</sup>	214 <sup>2</sup>	Yes	Yes	119 <sup>2</sup>	104 <sup>2</sup>	Yes	Yes

<sup>1</sup> Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

<sup>2</sup> 95th percentile volume exceeds capacity, queue may be longer. Queue shown is maximum after two cycles.

## 7 EAC AND EAPC (2025) TRAFFIC CONDITIONS

This section discusses the methods used to develop EAC and EAPC (2025) traffic forecasts and the resulting intersection operations, traffic signal warrant, and off-ramp queuing analyses.

### 7.1 ROADWAY IMPROVEMENTS

The lane configurations and traffic controls assumed to be in place for EAC and EAPC (2025) conditions are consistent with those shown previously on Exhibit 3-1, with the exception of the following:

- Project driveways and those facilities assumed to be constructed by the Project Buildout (Phase 1 & 2) to provide site access are also assumed to be in place for EAPC conditions only (e.g., intersection and roadway improvements along the Project's frontage and driveways).
- Driveways and those facilities assumed to be constructed by cumulative developments to provide site access are also assumed to be in place for EAC and EAPC (2025) conditions only (e.g., intersection and roadway improvements along the cumulative development's frontages).

### 7.2 EAC (2025) TRAFFIC VOLUME FORECASTS

To account for background traffic, other known cumulative development projects in the study area were included in addition to 12.55% of ambient growth for EAC (2025) traffic conditions. The weekday ADT and weekday AM and PM peak hour volumes (in actual vehicles) which can be expected for EAC (2025) traffic conditions are shown on Exhibit 7-1.

### 7.3 EAPC (2025) TRAFFIC VOLUME FORECASTS

To account for background traffic, other known cumulative development projects in the study area were included in addition to 12.55% of ambient growth for EAPC (2025) traffic conditions in conjunction with traffic associated with the proposed Project Buildout (Phase 1 & 2). The weekday ADT and weekday AM and PM peak hour volumes (in actual vehicles) which can be expected for EAPC (2025) traffic conditions are shown on Exhibit 7-2.

**EXHIBIT 7-1: EAC (2025) TRAFFIC VOLUMES (IN ACTUAL VEHICLES)**



#	1 I-215 SB Ramps & Harley Knox Bl.	2 I-215 NB Ramps & Harley Knox Bl.	3 Natwar Ln./ Driveway 3 & Driveway 1	4 Natwar Ln. & Driveway 2	5 Natwar Ln. & Nandina Av.																																																																																																																							
	<p>14,250</p> <table border="1"> <tr> <td>274(204)</td> <td>645(451)</td> <td>280(256)</td> <td></td> </tr> <tr> <td>← 1(0)</td> <td>←</td> <td>←</td> <td></td> </tr> <tr> <td></td> <td>184(588)</td> <td></td> <td></td> </tr> <tr> <td>841(562)</td> <td></td> <td></td> <td></td> </tr> <tr> <td>→</td> <td></td> <td></td> <td></td> </tr> <tr> <td>21(80)</td> <td></td> <td></td> <td></td> </tr> <tr> <td>↓</td> <td></td> <td></td> <td></td> </tr> </table> <p>21,600</p>	274(204)	645(451)	280(256)		← 1(0)	←	←			184(588)			841(562)				→				21(80)				↓				<p>35,250</p> <p>22,000</p> <table border="1"> <tr> <td></td> <td></td> <td>1079(961)</td> <td></td> </tr> <tr> <td></td> <td></td> <td>← 420(803)</td> <td></td> </tr> <tr> <td>513(370)</td> <td>44(41)</td> <td>3(3)</td> <td>246(327)</td> </tr> <tr> <td>←</td> <td>→</td> <td>→</td> <td>→</td> </tr> <tr> <td>974(642)</td> <td></td> <td></td> <td></td> </tr> </table> <p>8,300</p>			1079(961)				← 420(803)		513(370)	44(41)	3(3)	246(327)	←	→	→	→	974(642)				<p>Future Intersection</p>	<p>Future Intersection</p>	<p>1,050</p> <table border="1"> <tr> <td>0(0)</td> <td>16(1)</td> <td>8(0)</td> </tr> <tr> <td>↓</td> <td>↓</td> <td>←</td> </tr> <tr> <td></td> <td></td> <td>9(6)</td> </tr> <tr> <td>0(0)</td> <td></td> <td></td> </tr> <tr> <td>→</td> <td></td> <td></td> </tr> <tr> <td>7(43)</td> <td></td> <td></td> </tr> <tr> <td>→</td> <td></td> <td></td> </tr> </table> <p>1,050</p>	0(0)	16(1)	8(0)	↓	↓	←			9(6)	0(0)			→			7(43)			→																																																				
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###(###) AM(PM) Peak Hour Intersection Volumes  
 ## Average Daily Trips

**EXHIBIT 7-2: EAPC (2025) TRAFFIC VOLUMES (IN ACTUAL VEHICLES)**



1	I-215 SB Ramps & Harley Knox Bl.	2	I-215 NB Ramps & Harley Knox Bl.	3	Natwar Ln./Driveway 3 & Driveway 4	4	Natwar Ln. & Driveway 2	5	Natwar Ln. & Nandina Av.
14,500	35,750	22,250	51,400	150	250	1,300	2,350		
274(204)	1(0)	682(467)	280(256)	1090(1002)	429(837)	0(0)	3(10)	0(0)	20(17)
841(562)	193(622)	513(370)	1011(658)	44(41)	3(3)	276(340)	0(0)	5(2)	9(4)
21(80)							2(6)		
21,600	11,150	35,700	8,550	100	250	1,050	1,300	1,050	
6 <td>Western Wy. &amp; Driveway 4 <td>7 <td>Western Wy. &amp; Nandina Av. <td>8 <td>Western Wy. &amp; Harley Knox Bl. <td></td> <td></td> <td></td> <td></td> </td></td></td></td></td>	Western Wy. & Driveway 4 <td>7 <td>Western Wy. &amp; Nandina Av. <td>8 <td>Western Wy. &amp; Harley Knox Bl. <td></td> <td></td> <td></td> <td></td> </td></td></td></td>	7 <td>Western Wy. &amp; Nandina Av. <td>8 <td>Western Wy. &amp; Harley Knox Bl. <td></td> <td></td> <td></td> <td></td> </td></td></td>	Western Wy. & Nandina Av. <td>8 <td>Western Wy. &amp; Harley Knox Bl. <td></td> <td></td> <td></td> <td></td> </td></td>	8 <td>Western Wy. &amp; Harley Knox Bl. <td></td> <td></td> <td></td> <td></td> </td>	Western Wy. & Harley Knox Bl. <td></td> <td></td> <td></td> <td></td>				
900	1,850	950	6,600	47,650					
0(0)	10(48)	0(0)	22(77)	0(2)	2(0)	22(9)	81(240)	0(0)	228(69)
0(0)	8(3)	13(14)	124(41)	69(31)	21(9)	10(22)	233(72)	2(7)	0(0)
3(10)	44(18)	65(150)	1044(920)	9(5)	2(3)	10(2)	1044(920)	2(7)	0(0)
100	1,000	2,850	5,050	51,400	300				

##(##) AM(PM) Peak Hour Intersection Volumes  
 ## Average Daily Trips



### 7.4 INTERSECTION OPERATIONS ANALYSIS

LOS calculations were conducted for the study intersections to evaluate their operations under EAC (2025) conditions with roadway and intersection geometrics consistent with Section 7.1 *Roadway Improvements*. As shown in Table 7-1, all the study area intersections are anticipated to operate at acceptable LOS during the peak hours under EAC and EAPC (2025) traffic conditions, with the exception of the following intersections:

- I-215 SB Ramps & Harley Knox Bl. (#1) – LOS F AM and PM peak hours
- I-215 NB Ramps & Harley Knox Bl. (#2) – LOS F AM and PM peak hours

The intersection operations analysis worksheets for EAC and EAPC (2025) traffic conditions are included in Appendix 7.1 and Appendix 7.2 of this TA, respectively.

**TABLE 7-1: INTERSECTION ANALYSIS FOR EAC & EAPC (2025) CONDITIONS**

# Intersection	Traffic Control <sup>1</sup>	EAC (2025)				EAPC (2025)			
		Delay <sup>2</sup> (secs.)		Level of Service		Delay <sup>2</sup> (secs.)		Level of Service	
		AM	PM	AM	PM	AM	PM	AM	PM
1 I-215 SB Ramps & Harley Knox Bl.	TS	<b>80.4</b>	<b>&gt;200.0</b>	F	F	<b>90.1</b>	<b>&gt;200.0</b>	F	F
2 I-215 NB Ramps & Harley Knox Bl.	TS	<b>167.5</b>	<b>131.7</b>	F	F	<b>177.6</b>	<b>138.7</b>	F	F
3 Natwar Ln./Driveway 3 & Driveway 1	<u>CSS</u>	Does Not Exist				8.3	8.4	A	A
4 Natwar Ln. & Driveway 2	<u>CSS</u>	Does Not Exist				8.6	8.8	A	A
5 Natwar Ln. & Nandina Av.	CSS	8.8	8.8	A	A	9.3	9.5	A	A
6 Western Wy. & Driveway 4	<u>CSS</u>	Does Not Exist				8.4	8.7	A	A
7 Western Wy. & Nandina Av.	AWS	8.1	7.5	A	A	9.5	8.1	A	A
8 Western Wy. & Harvey Knox Bl.	TS	17.0	12.9	B	B	24.9	14.9	C	B

\* **BOLD** = Level of Service (LOS) does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

<sup>1</sup> AWS = All-way Stop; CSS = Cross-street Stop; TS = Traffic Signal; CSS = Improvement

<sup>2</sup> Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

### 7.5 TRAFFIC SIGNAL WARRANTS ANALYSIS

Traffic signal warrants have been performed for EAC and EAPC (2025) traffic conditions based on peak hour volumes and daily traffic (ADT). No traffic signals are warranted at the study area intersections (see Appendices 7.3 and 7.4).

## 7.6 OFF-RAMP QUEUING ANALYSIS

EAC and EAPC (2025) peak hour off-ramp queuing has been evaluated for the study area intersections based on the analysis methodologies presented in Section 2 *Methodologies* of this TA. As shown in Table 7-2, there are no off-ramp movements that are anticipated to experience queuing issues during the weekday AM or weekday PM peak 95<sup>th</sup> percentile traffic flows. Worksheets for EAC and EAPC (2025) traffic conditions off-ramp queuing analysis are provided in Appendices 7.5 and 7.6, respectively.

## 7.7 RECOMMENDED IMPROVEMENTS

Improvement strategies have been recommended at intersections that have been identified as deficient under EAPC (2025) traffic conditions in an effort to achieve an acceptable LOS (i.e., LOS E or better).

The effectiveness of the recommended improvement strategies to address EAPC (2025) traffic deficiencies are presented in Table 7-3. Worksheets for EAPC (2025) conditions, with improvements, HCM calculation worksheets are provided in Appendix 7.7. The EAPC (2025) off-ramp queuing, with improvements, are presented in Table 7-4. Worksheets EAPC (2025) traffic conditions, with improvements, off-ramp queuing analysis are provided in Appendix 7.8.

The Project Applicant shall participate in the funding of off-site improvements, including traffic signals that are needed to serve cumulative traffic conditions through the payment of NPRBBD fees (if the improvements are included in the NPRBBD fee program) or on a fair share basis (if the improvements are not included in the NPRBBD fee program). These fees shall be collected by the City of Perris, with the proceeds solely used as part of a funding mechanism aimed at ensuring that regional highways and arterial expansions keep pace with the projected population increases.

**TABLE 7-2: PEAK HOUR FREEWAY OFF-RAMP QUEUING SUMMARY FOR EAC AND EAPC (2025) CONDITIONS**

# Intersection	Movement	Available Stacking Distance (Feet)	EAC (2025)				EAPC (2025)			
			95th Percentile Queue (Feet)		Acceptable? <sup>1</sup>		95th Percentile Queue (Feet)		Acceptable? <sup>1</sup>	
			AM Peak Hour	PM Peak Hour	AM	PM	AM Peak Hour	PM Peak Hour	AM	PM
1 I-215 Southbound Ramps & Harley Knox Bl.	SBL/T	1,330	961 <sup>2</sup>	473 <sup>2</sup>	Yes	Yes	1,033 <sup>2</sup>	502 <sup>2</sup>	Yes	Yes
	SBR	270	128	51	Yes	Yes	136	55	Yes	Yes
2 I-215 Northbound Ramps & Harley Knox Bl.	NBL/T	1,120	72	76	Yes	Yes	72	76	Yes	Yes
	NBR	265	279 <sup>2</sup>	300 <sup>2</sup>	Yes <sup>3</sup>	Yes <sup>3</sup>	362 <sup>2</sup>	342 <sup>2</sup>	Yes <sup>3</sup>	Yes <sup>3</sup>

<sup>1</sup> Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

<sup>2</sup> 95th percentile volume exceeds capacity, queue may be longer. Queue shown is maximum after two cycles.

<sup>3</sup> Although 95th percentile queue is anticipated to exceed the available storage for the turn lane, the adjacent through lane has sufficient storage to accommodate any spillover without spilling back and affecting the I-215 Freeway mainline.

**TABLE 7-3: INTERSECTION ANALYSIS FOR EAC & EAPC (2025) CONDITIONS WITH IMPROVEMENTS**

# Intersection	Traffic Control <sup>1</sup>	Intersection Approach Lanes <sup>2</sup>												Delay <sup>3</sup> (secs.)		Level of Service	
		Northbound			Southbound			Eastbound			Westbound			AM	PM	AM	PM
		L	T	R	L	T	R	L	T	R	L	T	R				
1 I-215 SB Ramps & Harley Knox Bl. -Without Improvements	TS	0	0	0	0	1	1	0	2	d	1	2	0	90.1	>200.0	F	F
	- With Improvements <sup>4</sup>	TS	0	0	0	0	1	1	0	2	d	<u>2</u>	<u>1</u>	53.4	33.9	D	C
2 I-215 NB Ramps & Harley Knox Bl. -Without Improvements	TS	0	1	1	0	0	0	1	2	0	0	2	1	177.6	138.7	F	F
	- With Improvements <sup>4</sup>	TS	0	1	1	0	0	0	<u>2</u>	2	0	0	2	<u>1</u> >>	13.7	13.0	B

\* **BOLD** = Level of Service (LOS) does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).  
<sup>1</sup> TS = Traffic Signal  
<sup>2</sup> When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.  
 L = Left; T = Through; R = Right; d = Defacto Right Turn Lane; 1 = Improvement  
<sup>3</sup> Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are  
<sup>4</sup> Per the City of Perris General Plan, LOS E is permitted at intersections along the I-215 Ramps.

**TABLE 7-4: PEAK HOUR FREEWAY OFF-RAMP QUEUING SUMMARY FOR EAC & EAPC (2025) CONDITIONS WITH IMPROVEMENTS**

# Intersection	Movement	Available Stacking Distance (Feet)	Without Improvements				With Improvements			
			95th Percentile Queue (Feet)		Acceptable? <sup>1</sup>		95th Percentile Queue (Feet)		Acceptable? <sup>1</sup>	
			AM Peak Hour	PM Peak Hour	AM	PM	AM Peak Hour	PM Peak Hour	AM	PM
1 I-215 Southbound Ramps & Harley Knox Bl.	SBL/T	1,330	1,033 <sup>2</sup>	502 <sup>2</sup>	Yes	Yes	956 <sup>2</sup>	596 <sup>2</sup>	Yes	Yes
	SBR	270	136	55	Yes	Yes	74	45	Yes	Yes
2 I-215 Northbound Ramps & Harley Knox Bl.	NBL/T	1,120	72	76	Yes	Yes	46	46	Yes	Yes
	NBR	265	362 <sup>2</sup>	342 <sup>2</sup>	Yes <sup>3</sup>	Yes <sup>3</sup>	217 <sup>2</sup>	197 <sup>2</sup>	Yes	Yes

<sup>1</sup> Stacking Distance is acceptable if the required stacking distance is less than or equal to the stacking distance provided. An additional 15 feet of stacking which is assumed to be provided in the transition for turn pockets is reflected in the stacking distance shown on this table, where applicable.

<sup>2</sup> 95th percentile volume exceeds capacity, queue may be longer. Queue shown is maximum after two cycles.

<sup>3</sup> Although 95th percentile queue is anticipated to exceed the available storage for the turn lane, the adjacent through lane has sufficient storage to accommodate any spillover without spilling back and affecting the I-215 Freeway mainline.

## 8 LOCAL AND REGIONAL FUNDING MECHANISMS

Transportation improvements throughout the City of Perris are funded through a combination of project mitigation, fair share contributions or development impact fee programs, such as TUMF program, the City's DIF program, or the NPRBBD program.

### 8.1 TRANSPORTATION UNIFORM MITIGATION FEE (TUMF) PROGRAM

The Western Riverside Council of Governments (WRCOG) is responsible for establishing and updating TUMF rates. The County may grant to 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 these fee programs. Fees are based upon projected land uses and a related transportation need to address growth based upon a 2016 Nexus study.

TUMF is an ambitious regional program created to address cumulative impacts of growth throughout western Riverside County. Program guidelines are being handled on an iterative basis. Exemptions, credits, reimbursements, and local administration are being deferred to primary agencies. The County of Riverside serves this function for the proposed Project. Fees submitted to the County are passed on to the WRCOG as the ultimate program administrator.

TUMF guidelines empower a local zone committee to prioritize and arbitrate certain projects. The Project is located in the Central Zone. The zone has developed a 5-year capital improvement program to prioritize public construction of certain roads. TUMF is focused on improvements necessitated by regional growth.

### 8.2 CITY OF PERRIS DEVELOPMENT IMPACT FEE (DIF) PROGRAM

In 1991, the City of Perris created a Development Impact Fee 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 to 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, 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 roadway segments and intersections included within the study area for this Traffic Impact Analysis are at various stages of widening and improvement based on the City's collection of DIF fees. Under this Program, as a result of the City's continual monitoring of the local circulation system, the City ensures that DIF improvements are constructed prior to when the LOS would otherwise fall below the City's established performance criteria.

### **8.3 NORTH PERRIS ROAD AND BRIDGE BENEFIT DISTRICT (NPRBBD)**

The NPRBBD is comprised of approximately 3,500 acres of land located within the northern portion of the City of Perris. The NPRBBD boundary is consistent with the boundary of the PVCC SP. As such, the Project will be subject to 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 DIF network. NPRBBD fees are inclusive of TUMF and DIF. 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.

Table 8-1 lists each facility identified within the NPRBBD, the General Plan roadway classification and the current estimated construction cost for the facilities.

**TABLE 8-1: NPRBBD FACILITIES**

<b>Facility Name</b>	<b>General Plan Classification</b>	<b>Estimated Cost</b>
Indian Avenue	Secondary Arterial	\$11,343,500
Perris Boulevard	Arterial	\$17,350,800
Redlands Avenue	Secondary Arterial	\$14,845,000
Harley Knox Boulevard	Arterial	\$31,813,700
Markham Street	Secondary Arterial	\$2,132,000
Ramona Expressway	Expressway	\$10,865,000
Morgan Street	Secondary Arterial	\$2,899,500
Rider Street	Secondary Arterial	\$3,803,000
Placentia Avenue	Arterial	\$18,705,900
Indian Avenue Bridge	Secondary Arterial	\$701,800
Harley Knox Boulevard Bridge	Arterial	\$4,210,800
Ramona Expressway Bridge	Expressway	\$2,105,800
Placentia Avenue Bridge	Arterial	\$6,316,200
Harley Knox Boulevard Interchange @ I-215	Arterial	\$17,371,000
Placentia Avenue Interchange @ I-215	Arterial	\$8,389,000
4-Lane Intersections – Traffic Signals	4 – Signal Locations	\$870,000
6-Lane Intersections – Traffic Signals	11 – Signal Locations	\$3,190,000
<b>District Totals</b>		<b>\$156,913,000</b>

The facilities identified within the NPRBBD provide additional benefit by providing alternate truck routes within the City of Perris. It should be noted that NPRBBD fees are to be paid in conjunction with TUMF and City DIF fees as a one-time fee payment to the City prior to the issuance of a building permit.

#### **8.4 FAIR SHARE CONTRIBUTION**

Project improvements may include a combination of fee payments to established programs, 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, the approving jurisdiction may elect to collect a fair share contribution or require the development to construct improvements.

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## 9 REFERENCES

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11. **Southern California Association of Governments.** *Connect SoCal: 2020-20415 Regional Transportation Plan/Sustainable Communities Strategy of the SCAG.* SCAG Region : s.n., Adopted September 2020.

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