Initial Study/Mitigated Negative Declaration for the March Plaza Project

DPR 22-00031, PLN22-0031, PLN23-05028, PLN23-05029

Lead Agency:
City of Perris
101 N. D Street
Perris, California 92570

October 2024

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INTRODUCTION

LEGAL AUTHORITY

This Initial Study/Mitigated Negative Declaration has been prepared in accordance with the *Guidelines for Implementation of the California Environmental Quality Act* (State CEQA Guidelines) and relevant provisions of the California Environmental Quality Act (CEQA) of 1970, as amended.

Initial Study. Section 15063(c) of the State CEQA Guidelines defines an Initial Study as the proper preliminary method of analyzing the potential environmental consequences of a project. The purposes of an Initial Study are:

(1) To provide the Lead Agency with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR) or a Negative Declaration;

(2) To enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling a project to quality for a Negative Declaration;

(3) Assist in the preparation of an EIR, if one is required;

(4) Facilitate environmental assessment early in the design of a project;

(5) Provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;

(6) Eliminate unnecessary EIRs; and

(7) Determine whether a previously prepared EIR could be used with the project.

The proposed project site is within the Perris Valley Commerce Center (PVCC) area of the City of Perris. The Perris Valley Commerce Center Specific Plan (PVCCSP) was adopted by the City of Perris City Council on January 12, 2012 (Ordinance No. 1284) and, as of the date that this Initial Study/Mitigated Negative Declaration was published, has been subsequently amended 14 times. Environmental impacts resulting from implementation of allowed development under the PVCCSP have been evaluated in the Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (PVCCSP EIR) (State Clearinghouse No. 2009081086), which was certified by the City of Perris in January 2012. The PVCCSP EIR is a program EIR and project-specific evaluations in later-tier environmental documents for individual development projects within the PVCC area was anticipated. As stated in Section 15168(d)(3) of the State CEQA Guidelines, "The program EIR can focus an EIR on a subsequent project to permit discussion solely of new effects which had not been considered before". As such, the environmental analysis for the proposed project presented in this Initial Study is based on, or "tiered" from, the analysis presented in the PVCCSP EIR, when applicable, and the PVCCSP EIR is incorporated by reference.

The PVCCSP EIR analyzed the direct and indirect impacts resulting from implementation of the allowed development under the PVCCSP. Measures to mitigate, to the extent feasible, the significant adverse project and cumulative impacts resulting from that development are identified in the EIR. In conjunction with certification of the PVCCSP EIR, the City of Perris also adopted a Mitigation Monitoring and Reporting Program. Additionally, the PVCCSP includes Standards and Guidelines to be applied to future development projects within the PVCC area. The City of Perris requires that future development projects within the PVCC area comply with the required PVCCSP Standards and Guidelines, and applicable PVCCSP EIR mitigation measures as outlined in the Mitigation Monitoring and Reporting Program, and that these requirements are implemented in a timely manner. Relevant Standards and Guidelines and applicable PVCCSP EIR mitigation measures that are incorporated into the proposed project are listed in the analysis for each topical issue in this Initial Study and are assumed in the analysis presented.

Pursuant to the provisions of CEQA and the State CEQA Guidelines, the City of Perris is the Lead Agency and is charged with the responsibility of deciding whether to approve the proposed project.

IMPACT ANALYSIS AND SIGNIFICANCE CLASSIFICATION

The following sections of this Initial Study/Mitigated Negative Declaration provide discussions of the possible environmental effects of the proposed project for specific issue areas that have been identified in the State CEQA Guidelines Appendix G Initial Study Checklist. For each issue area, potential effects are isolated.

A "significant effect" is defined by Section 15382 of the State CEQA Guidelines as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by a project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance." According to the State CEQA Guidelines, "an economic or social change by itself shall not be considered a significant effect on the environment, but may be considered in determining whether the physical change is significant."

INITIAL STUDY

PROJECT TITLE

March Plaza Project (APNs 302-090-052 through 302-090-061)
Development Plan Review (DPR) 22-00031, PLN22-0031, PLN23-05028, PLN23-05029

LEAD AGENCY and CONTACT PERSON

City of Perris
101 N. D Street
Perris, California 92570
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PROJECT APPLICANT

Applicant:
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3057 McConnell Drive
Los Angeles, California 90064

Agent:
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Agoura Hills, California 91301

PROJECT SITE CHARACTERISTICS

Location and Surrounding Land Uses: The project site is located at the northwest corner of Perris Boulevard and Harley Knox Boulevard in Perris, California. The 4.37-acre site is vacant, and has been disked. The site supports limited non-native vegetation cover. Surrounding land uses include:

North – Light industrial development beyond Perris Valley Channel Lateral B
South – Big box retail
West – Light industrial development
East – 7-Eleven on site; vacant land beyond

Existing General Plan Designation (Land Use Category) and Zoning: The City of Perris General Plan land use designation for the site is PVCC SP - Perris Valley Commerce Center Specific Plan. The PVCCSP establishes the zoning for the properties within the PVCC area. The PVCCSP zoning designation for the site is Commercial.

Surrounding land use designations include:

North – Business Park/Industrial (City of Moreno Valley) beyond a Riverside County flood control facility

South – Commercial (PVCCSP)
West – Light Industrial (PVCCSP)
East – Commercial (PVCCSP)

PROJECT BACKGROUND AND CONTEXT

In 2017, the City of Perris approved the March Plaza Project (Conditional Use Permit 16-05165, Tentative Parcel Map 16-05166, and Conditional Use Permit 16-05171), a multi-phase retail commercial development that included seven buildings and a total of 47,253 square feet of retail space as well as 254 parking spaces located at the northwestern corner of Harley Knox Boulevard and Perris Boulevard. The project vicinity is shown in **Figure 1** while **Figure 2** shows a detailed location map. That project was subject to CEQA review and in the resulting Negative Declaration, was found to have less than significant impacts and no mitigation measures were required (Source: 22). This finding was based in part on several technical studies that were considered in the CEQA analysis, including those related to biological resources, cultural resources, a Phase 1 Environmental Site Assessment, geotechnical evaluation, traffic study, and air quality study. While no CEQA mitigation measures were required, the approved project was subject to a variety of conditions of approval outside of the CEQA process. These included the following public improvements that were required to be constructed prior to project development:

- Curbs, gutters and sidewalks;
- Realignment of the intersection of Harley Knox Boulevard and Perris Boulevard;
- A new traffic signal at that intersection;
- Required ingress and egress curb cuts;
- Fire hydrant;
- Utility approvals and stub outs; and
- Fencing as required by County Flood Control on the northern portion of the site.

These improvements were all subsequently completed and the entire site was mass graded in anticipation of development of CUP 16-05165. In the first phase of the approved project, Building "E" (a 7-Eleven store), was permitted and built on Parcel 1, but the remaining approved commercial component of the project was not constructed. **Figure 3** shows the public improvements that have been completed pursuant to the original project approval, while **Figure 4** shows the onsite improvements that have already been made as part of the approved project.

In 2023, the original project applicant submitted an application to construct a less intensive business park office development on a portion of the remaining unbuilt area within the previously approved March Plaza project site, essentially a modification of the final phase of the approved project to a less intensive use. However, the City determined that this new development concept would require the following: a Specific Plan Amendment (SPA), a Planned Development Overlay (PDO), a Development Plan Review (DPR), a new Tentative Parcel Map (TPM), an updated Title Report, and approval from the Riverside County Airport Land Use Commission (ALUC). The intent of the Plan Development Overlay is to allow flexibility with respect to architectural design standards and to allow development consistent with the City's Business Park Office (BPO) Specific Plan designation within the underlying Commercial (C) zone.

Figure 1. Project Vicinity

Figure 2. Project Location

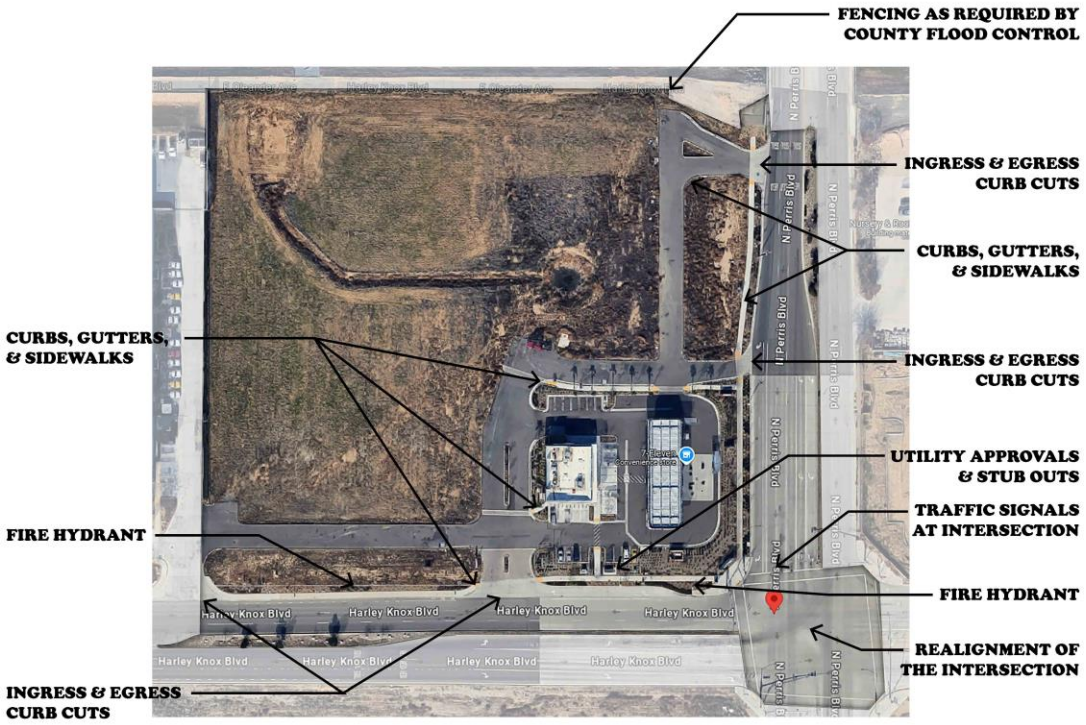

Figure 3. Completed Public Improvements Pursuant to 2017 Project Approval

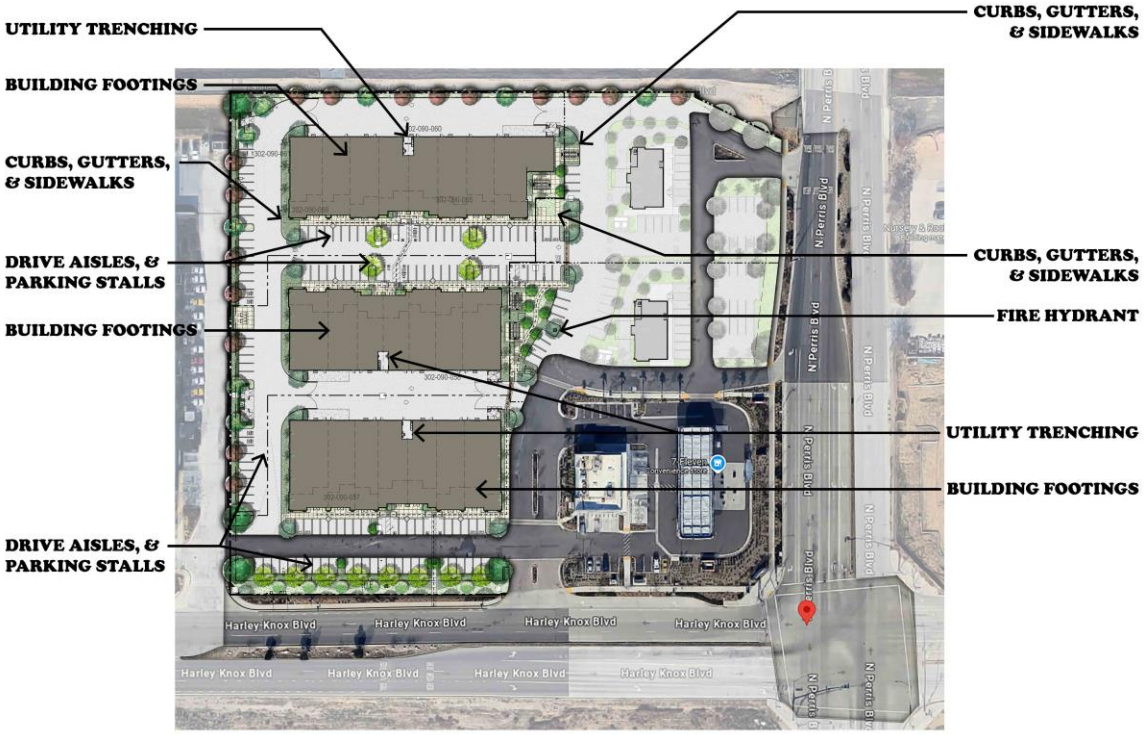

Figure 4. Completed Onsite Improvements Pursuant to 2017 Project Approval

As the Specific Plan Amendment requires discretionary approval, the City determined that the new proposed development is subject to an updated determination under CEQA, as well as a Storm Water Quality Management Plan (SWQMP). The City also required new technical studies related to traffic, air quality and greenhouse gas emissions to document potential new impacts (if any) from this updated less intensive development concept for this property. This Initial Study/Negative Declaration addresses these requirements, and refers to the required technical studies as appropriate.

PROJECT DESCRIPTION

The proposed project is called the March Plaza Project (PLN22-00031, DPR 22-00031, PLN23-05028, PLN23-05029), which would involve the construction and operation of three (3) multi-tenant concrete tilt-up buildings with spec suites. Projected uses would be non-industrial in nature, and more consistent with business park or office development. No use or transport of hazardous materials is anticipated. The total building area would be 66,686 square feet. A total of 143 parking spaces serving the development would be provided, including 8 accessible stalls. Pursuant to Section 5.106.5.3.1 of the 2022 California Green Building Standards (CALGreen) Code, at least 25 electric vehicle (EV) capable parking spaces would be provided while at least six of these spaces would provide EV chargers at the time that the project begins operations; more chargers would be added in the future based on demand. In addition, 12 bicycle parking stalls will be provided. Project access would be via one driveway from Perris Boulevard and one driveway from Harley Knox Boulevard. All improvements are already sized to serve the updated project, since the updated project is simply a less intensive final phase of the originally approved project.

Proposed landscaping includes trees throughout the parking area, including trees to screen and soften visual impacts from adjacent streets and properties, which are intended to meet the standards of the PVCCSP and 2022 CALGreen Code. Please refer to the Section I.c. (Aesthetics) for additional discussion and analysis.

Figure 5 shows the site plan for the project.

Figure 5. Proposed Site Plan

Figure 6 shows a street level rendering of the proposed project.

Figure 6. Project Rendering

The project also requires an amendment to the PVCCSP in order to include a Planned Development Overlay (PDO) on the 4.37-acre project site to facilitate the proposed development. The PDO would allow flexibility from the architectural design standards, development standards and land uses of the underlying Commercial (C) zone with the proposed Overlay to allow business professional office uses. The specific changes to the PVCCSP would be made to Figure 2.0-1 Specific Plan Land Use Designation, Figure 4.0-16 Residential Buffer, and the Table of Contents.

PUBLIC AGENCIES WHOSE APPROVAL MAY BE REQUIRED FOR SUBSEQUENT ACTIONS (e.g. permits, financing approval, or participation agreement):

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

- Eastern Municipal Water District - Approval of design conditions, water, and sewer improvement plans

ENVIRONMENTAL DETERMINATION

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Ag/Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology / Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	
☐ Mandatory Findings of Significance		

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project COULD have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the applicant. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

_____ _____

Nathan Perez
Senior Planner
City of Perris

Date

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a Lead Agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). Earlier analyses and references are discussed at the end of the checklist.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) The analysis of each issue should identify:
   a) the significance criteria or threshold used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS - Would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In non-urbanized areas, Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				X
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		X		

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to aesthetics/visual character and lighting. These Standards and Guidelines summarized below are incorporated as part of the proposed project and are assumed in the analysis presented in this section. The chapters/section numbers provided correspond to the PVCCSP chapters/sections. There are no mitigation measures for aesthetics included in the PVCCSP EIR, although PVCCSP EIR mitigation measures MM Haz 3 and MM Haz 5, which are listed in Section IX, address potential impacts associated with lighting at the project site.

Approval of the project would amend the PVCCSP to include a Planned Development Overlay (PDO) on the 4.37-acre project site to facilitate the proposed development. The intent of the PDO is to allow flexibility with respect to architectural design standards and to allow development consistent with the City's Business Park Office (BPO) Specific Plan designation within the underlying Commercial (C) zone. Thus, this analysis examines the project's consistency with the applicable design standards in the PVCCSP as amended, specifically those related to the BPO designation. In summary, these include the following:

- Minimum Lot Size – 20,000 square feet
- Minimum Lot Frontage and Width – 100 feet
- Minimum Lot Depth – 150 feet
- Maximum Height of Structures – 50 feet
- Setbacks – 10-foot front setback from arterials; no side or rear setbacks from non-residential use
- Minimum Landscape Coverage – 15%

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

4.1 Perris Valley Commerce Center On-Site Development Standards

In order to ensure the orderly, consistent, and sensible development of the Perris Valley Commerce Center Specific Plan, land use standards and design criteria have been created for each land use

category. A summary of the standards for Industrial projects within the Specific Plan area is provided below.

4.2 On-Site Standards and Guidelines

4.2.1 General On-Site Project Development Standards and Guidelines

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

4.2.3 Architecture

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

4.2.4. Lighting

- 4.2.4.1 General Lighting: Safety and Security; Lighting Fixtures Shield; Foot-candle Requirements Sidewalks/Building Entrances; and Outdoor Lighting.
- 4.2.4.2 Decorative Lighting Standards: Decorative Lights; Complimentary Lighting Fixtures; Monumentation Lighting; Compatible with Architecture; Up-Lighting; Down-Lighting; Accent Lighting; and High Intensity Lighting.
- 4.2.4.3 Parking Lot Lighting: Parking Lot Lighting Required; Foot-candle Requirements Parking Lot; Avoid Conflict with Tree Planting Locations; Pole Footings; and Front of Buildings and Along Main Drive Aisle.

4.2.5 Signage Program

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

4.2.6 Walls/Fences

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

4.2.8 Residential Buffer Development Standards and Guidelines

- Direct Lighting Away from Residential.
- Screening.
- Other Restrictions May be Required Based on Actual Use.

4.2.9 Visual Overlay Zone Development Standards and Guidelines

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

Landscape Standards and Guidelines (from Chapter 6.0 of the PVCCSP)

6.1 On-Site Landscape General Requirements

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

6.1.1 On-Site Landscape Screening

- Plant Screening Maturity.
- Screen wall Planting.
- Trash Enclosures.

6.1.2 Landscape in Parking Lots

- Minimum 50% Shade Coverage.
- Planter Islands.
- Parking Lot Screening.
- One Tree per Six Parking Spaces.

- Concrete Curbs, Mow Strips or Combination.
- Planter Rows Between Opposing Parking Stalls or Diamond Planters.
- Pedestrian Linkages.

6.1.3 On-Site Plant Palette

Business/Professional Office Standards and Guidelines (from Chapter 9.0 of the PVCCSP)

9.2 Business/Professional Office Standards and Guidelines

9.2.1 Business/Professional Office Site Layout

- 9.2.1.1 Pedestrian Access and On-Site Circulation.
- 9.2.1.2 Parking and Loading.
- 9.2.1.3 Plazas, Employee Break Areas, and Amenities.
- 9.2.1.4 Outdoor Storage and Display.

9.2.2 Architecture

- 9.2.2.1 Scale, Massing and Building Relief.
- 9.2.2.2 Architectural Elevations and Details.
- 9.2.2.3 Furnishings.
- 9.2.1.4 Outdoor Storage and Display.

9.2.3 Signage

- 9.2.3.1 Identity.

a., b. Scenic Vistas/Resources: *No Impact.* The Perris General Plan 2030 does not identify any specific landform or scenic vistas that exist within the project area. There are no buildings at the site, nor does the site feature rock outcroppings or vegetation. The site is vacant, disturbed land in a developing section of the City of Perris. On-site topography is primarily flat, with no hills, valleys, rock outcroppings, waterways, or other scenic resources that create a scenic vista.

No roadways in the project area are designated as state or local scenic highways. No scenic aspects are associated with the property and development of the project would not block any scenic vistas from other properties since it is an infill project located adjacent to existing commercial/industrial development. No impacts would result. (Sources: 1, 3, 12)

c. Visual Character and Quality. *No Impact.* The PVCCSP identifies both Perris Boulevard and Harley Knox Boulevard as Visual Overlay Zones, with requirements for aesthetic enhancements. In general, the relevant requirements are as follows:

- A quality architectural presence should be established with an emphasis on layout, finish materials, site accenting elements, and landscaping;

- Full building articulation and enhancement is required on any facades visible from the street;

- Screenwall designs shall be integrated with accent landscaping;

- Landscaped setback areas must incorporate enhancements that include accent accessories such as boulders, trellises, or garden walls, beyond basic plant material.

- Primary entry drives shall have a distinct landscape statement, landscaped median and enhanced paving;

- Entry plazas and/or significant architectural features or public art shall be used as a focal point.

- Screening or offset views into loading/service area or locate service areas away from street frontages to the rear of the property, next to truck loading.

- To achieve greater front yard landscaping, landscaping alongside or rear setbacks may be limited unless necessary to screen and buffer loading activity areas from adjacent non-industrial use or public view. Overall percent of landscaping required must be provided, but may be consolidated towards the Visual Zone areas.

- Trees and other landscape features shall be illuminated by concealed "uplight" fixtures along major collector roads. All fixtures shall be located, shielded and aimed so that light is not cast toward adjacent properties, streets or transmitted into the sky.

- Accent landscaping shall be used along building foundation.

- If adjacent to major roadway street frontage, parking lots shall be heavily landscaped.

- Parking fields shall be limited between street frontage and building to the greatest extent possible

Not all of these standards are applicable to the project, since it does not include loading docks, an entry plaza, or screenwalls. But the project design includes high quality building materials, building articulation visible from the street, landscaping that screens parking areas from the street, and shielded lighting elements. The project would be consistent with these PVCCSP requirements. No impacts associated with this issue would occur and no mitigation is required. (Sources: 1, 3, 12)

d. Light and Glare: *Less Than Significant With Mitigation Incorporated.* The City of Perris General Plan recognizes that as undeveloped areas are built up, light and glare will increase, and the Zoning Code and Mt. Palomar Ordinance adopted by the City of Perris provide requirements to avoid adverse glare or light impacts. Sources of light and glare include streetlights, which are required along all public streets, and illumination of walking and parking lot areas. The project development would use lighting fixtures with full cut-off features directed downward to prevent light above the horizontal plane of the bottom of the light fixture and minimize glare onto adjacent properties. As a result, neither source is anticipated to cause significant adverse glare or light impacts. Therefore the potential effects from light and glare would be less than significant during project operation. (Sources: 1, 2, 3)

During project construction, nighttime lighting may be used within the construction staging areas to provide security for construction equipment. Due to the distance between the construction area and the adjacent roadways, such security lights may result in glare to motorists. However, this potential impact would be reduced to a less than significant level through implementation of mitigation measure MM A-1 which would require the temporary lighting to be downward facing and hooded. In addition, the City's standard construction permitting process and compliance with existing municipal code regulations would ensure that impacts would be less than significant.

Findings and Mitigation: The following mitigation measure would reduce potential impacts to a less than significant level.

> **MM A-1**: Prior to issuance of grading permits, the project developer shall provide evidence to the City that any temporary nighttime lighting installed for security purposes shall be downward facing and hooded or shielded to prevent security light spillage by one foot candle to surrounding properties outside of the staging area or direct broadcast of security light into the sky.

ISSUES:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
II. AGRICULTURE AND FORESTRY RESOURCES - Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to nonagricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (per Public Resources Code § 12220(g), timberland (Public Resources Code § 4526, or timberland zoned Timberland Production (per Govt Code §51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

There are no Standards and Guidelines or mitigation measures related to agriculture and forestry resources included in the PVCCSP or its associated PVCCSP EIR.

a. Farmland Conversion. *No Impact.* Important farmland maps are compiled by the California Department of Conservation Farmland Mapping and Monitoring Program. These maps utilize data from the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) soil survey and current land use information using eight mapping categories and represent an inventory of agricultural resources within Riverside County. The project site is designated as "Farmland of Local Importance" by the Farmland Mapping and Monitoring

Program, which means the land has soils that would be classified as prime and statewide but lack available irrigation water. According to aerial photographs of the site, farming occurred on the site intermittently from the 1940s through the 1970s but no farming operations currently exist on-site. Since no Prime, Unique, or Statewide Important farmland is located within the project limits, the proposed project would not result in the conversion of land designated as Prime, Unique, or Statewide Importance Farmland (Farmland). Therefore, no impact would occur and no mitigation is required. (Source: 1)

b. Williamson Act. *No Impact.* There currently is no Williamson Act Conservation contract on the project site. In addition, the PVCCSP zoning designation for the site is Commercial. The City does not have any designated agricultural zoning. Therefore, the proposed project would not conflict with an existing agricultural zoning designation. Since there are no Williamson Act contracts or existing agricultural zoning designations within the project site, no impact associated with this issue would occur. No mitigation is required. (Source: 1)

c. and d. Forest or Timberland Zoning. *No Impact.* The proposed business park would not conflict with any existing zoning for, or cause the rezoning of forest land or timberland, as none exists in the area. Therefore, no impact to forest land or timberland would occur and no mitigation is required. (Sources: 1, 3)

e. Impacts to Nearby Farmland. *No Impact.* There are only two small areas of agricultural farming within one mile of the project site, and these are a temporary nonconforming use on land zoned for industrial development within the Perris Valley Commerce Center Specific Plan. The land surrounding the site is classified as "Urban and Built-up Land" and "Farmland of Local Importance" by the Farmland Mapping and Monitoring Program. The project site is surrounded by large warehouses and other industrial uses, and vacant land. Since the project site is not zoned for agricultural use, no agricultural use is adjacent to the project site, and surrounding properties are being developed at a rapid pace with industrial buildings, the project would not surround or otherwise isolate an existing adjacent agricultural property to the point where agriculture activity is no longer feasible. Therefore, no impact with respect to conversion of agricultural lands to non-agricultural uses would occur and no mitigation is required. As previously discussed above, no impact to forest land or timberland would occur and no mitigation is required. (Sources: 1, 3 & 13)

Findings and Mitigation: No impacts would occur; therefore, no mitigation is required.

ISSUES:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
III. AIR QUALITY - Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those adversely affecting a substantial number of people?			X	

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

There are no PVCCSP Standards and Guidelines applicable to the analysis of air quality for the proposed project.

The air quality section has been prepared based on a January 2024 air quality report prepared by Envicom Corporation, which is attached as Appendix A to this Initial Study. The analysis included below summarizes the information in that report, which was prepared to comply with PVCCSP EIR mitigation measures MM Air 1 and MM Air 10, and is considered to be part of the Initial Study analysis by reference. (Source: 21)

Additional PVCCSP EIR mitigation measures that are applicable to the proposed project are incorporated into the following analysis.

State CEQA Guidelines Significance Criteria

Air quality impacts of a project are considered significant if they cause clean air standards to be violated where they are currently met, or if they substantially contribute to an existing violation of standards. Substantial emissions of air contaminants for which there is no safe exposure, or nuisance emissions such as dust or odors, that are generated by a project, would also be considered significant impacts. The *State CEQA Guidelines* significance thresholds are defined in the questions set forth in the Environmental Checklist shown above.

a. AQMP Consistency. *Less Than Significant Impact.* The City of Perris is located within the South Coast Air Basin. The South Coast Air Quality Management District (AQMD) is responsible for comprehensive air pollution control within the South Coast Air Basin and prepares the Air Quality Management Plan (AQMP) for the South Coast Air Basin. The AQMD's 2022 Air Quality Management Plan is the area's applicable air quality plan. As part of the State Implementation

Plan, the AQMP is designed to reduce air pollution year over year and bring the region into attainment as applicable. A project could conflict with the AQMP if it significantly deviated from the projected growth estimates that underline the pollution control measures developed in the AQMP.

Growth estimates used to prepare the AQMP are derived from growth estimates developed by the Southern California Association of Governments (SCAG). The growth estimates for the 2022 AQMP are provided by Connect SoCal: the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments (Connect SoCal 2020). Accordingly, if a project demonstrates compliance with local land use plans and/or population projections, then the AQMP would have taken into account such uses when it was developed.

Riverside County is projected to add 186,000 new jobs between 2020 and 2035 and increase in population by 503,000 people. The project would be estimated to employ approximately 96 people based upon trip generation estimates. The number of jobs created by the project and the potential households that could move from outside of the County for the jobs would be well within expected growth projections for the County. The project would therefore be consistent with the assumptions the AQMP is based upon. The project also would not change the land use designation or zoning of the project site, and therefore would not affect the assumptions the AQMP is based upon. Therefore, the impact of the project would be less than significant.

b. Emissions from Project Construction and Operation. *Less Than Significant Impact.* As the amount of a secondary pollutant that may result from a project cannot be quantified by direct measurement of its emissions from a source, the South Coast AQMD has designated significant emissions levels of precursor components as surrogates for evaluating whether a project's emissions could result in significant regional air quality impacts associated with secondary pollutants. Projects with daily emissions that exceed any of the emission thresholds shown in **Table 1, South Coast AQMD CEQA Daily Emissions Thresholds**, are recommended by the South Coast AQMD to be considered significant under CEQA.

Table 1. South Coast AQMD CEQA Daily Emissions Thresholds

Pollutant	Construction	Operations
Volatile Organic Compounds (VOC)	75	55
Oxides of Nitrogen (NO_X)	100	55
Carbon Monoxide (CO)	550	550
Particulate Matter (PM-10)	150	150
Particulate Matter (PM-2.5)	55	55
Sulfur Oxides (SO_X)	150	150
Source: South Coast AQMD CEQA Air Quality Significance Thresholds. Revision March 2023.		

Construction Activity Impacts

Dust is typically the primary concern during the construction of projects that would involve land clearing and grading. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions." Emission rates vary as a function of many parameters (including soil silt, soil moisture, wind speed, area disturbed, number of vehicles, and depth of disturbance or excavation).

The California Emissions Estimator Model (CalEEMod) is a statewide land use emissions

computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as from energy use, solid waste disposal, vegetation planting and/or removal, and water use. The model was developed for the California Air Pollution Officers Association in collaboration with the California air districts.

The proposed project's estimated construction emissions were modeled using CalEEMod version 2022.1.1.21 to identify maximum daily emissions for each pollutant during project construction. The output report from CalEEMod are included in the Air Quality report, attached as **Appendix A** to this Initial Study.

The project's estimated maximum daily construction emissions, as calculated by CalEEMod, are listed in **Table 2, Maximum Daily Construction Emissions (pounds/day)**. All construction grading projects in the South Coast Air Basin must comply with the requirements of South Coast AQMD Rule 403, Fugitive Dust, which requires the implementation of Best Available Control Measures for all fugitive dust sources. South Coast AQMD Rule 403, Control Measure 08-2 states that during earth moving activities, projects are required to "Re-apply water as necessary to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction." Therefore, pursuant to South Coast AQMD Rule 403, the project would be required to implement adequate watering of exposed surfaces during grading.

Table 2. Maximum Daily Construction Emissions (pounds/day)

	VOC	NO_X	CO	SO_2	PM-10	PM-2.5
Maximum Daily Construction Emissions	34.5	36.05	34.03	<0.1	9.5	5.5
South Coast AQMD Thresholds	75	100	550	150	150	55
Significant Impact? Yes/No	No	No	No	No	No	No
Source: CalEEMod Report, January 2024 (Appendix A). Maximum for Summer or Winter, whichever is greater. Estimates based on application of water for dust suppression as required by South Coast AQMD Rule 403 – Fugitive Dust.						

As seen in Table 2, peak daily construction activity emissions of criteria air pollutants are estimated to be far below the South Coast AQMD thresholds of significance. Therefore, construction period air quality impacts of the project would be less than significant. Although the construction emissions would be less than significant, the project would be required to comply with PVCCSP EIR mitigation measures MM Air 2 through MM Air 9. Implementation of these PVCCSP EIR mitigation measures would further reduce the otherwise less than significant construction-related emissions of the project.

Operational Impacts

During operations, the proposed uses would result in emissions of criteria pollutants from area sources (i.e., consumer products, architectural coatings, and landscaping equipment), energy sources (electricity and natural gas usage), and mobile sources (vehicle use). Three electric forklifts, one for each building, were added to the operational profile assuming one or more tenant will utilize such equipment. The South Coast AQMD thresholds for air quality impacts from operations are shown in Table 1. Operations of the proposed development would not exceed the South Coast AQMD significance thresholds for criteria pollutants, as shown in **Table 3, Maximum Daily Operations Emissions (pounds/day)**.

Table 3. Maximum Daily Operations Emissions (pounds/day)

Project Emissions Sources	VOC	NO_X	CO	SO_2	PM-10	PM-2.5
Mobile	0.6	1.9	7.8	<0.1	2.1	0.5
Area	2.1	<0.1	2.9	< 0.1	< 0.1	< 0.1
Energy	<0.1	0.5	0.4	< 0.1	< 0.1	<0.1
Total	**2.7**	**2.4**	**11.1**	**<0.1**	**2.1**	**0.6**
South Coast AQMD Thresholds	55	55	550	150	150	55
Significant Impact? Yes/No	No	No	No	No	No	No

Source: CalEEMod Report, January 2024 (Appendix A). Figures are for Summer or Winter season emissions, whichever is greater.
Totals may not add due to rounding.

As seen in Table 3, the project's total operational emissions would be far below the South Coast AQMD thresholds. Therefore, operational impacts of the project would be less than significant. Although the operational emissions would be less than significant, the project would be required to comply with PVCCSP EIR mitigation measures MM Air 13, MM Air 14, MM Air 19, and MM Air 20. Implementation of these PVCCSP EIR mitigation measures would further reduce the otherwise less than significant construction-related emissions of the project and address the project's contribution to cumulative air quality impacts within the PVCC area and the City of Perris.

PVCCSP EIR mitigation measure MM Air 18 requires project applicants to contact the Riverside Transit Agency (RTA) prior to the approval of each implementing development project to determine if the RTA has plans for the future provision of bus routing within any street that is adjacent to the implementing development project that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that will serve the implementing development project, road improvements adjacent to the project site shall be designed to accommodate future bus turnouts at locations established through consultation with the RTA. The RTA shall be responsible for the construction and maintenance of the bus stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalks and curb and gutter at bus stops and the use of ADA-compliant paths to the major building entrances in the project. In response to this PVCCSP EIR mitigation measure, the project applicant contacted the RTA on July 31, 2024. RTA staff indicated that no changes in operations in the vicinity of the project site are contemplated at this time. By contacting the RTA prior to project approval, the project has complied with the requirements of PVCCSP EIR mitigation measure MM Air 18.

c. Sensitive Receptors Exposure to Substantial Pollutant Concentrations. *Less Than Significant Impact.* Air quality impacts are analyzed relative to those persons with the greatest sensitivity to air pollution exposure. Such persons are called "sensitive receptors." Sensitive receptors include the elderly, young children, the acutely and chronically ill (e.g., those with cardio-respiratory disease, including asthma), and persons engaged in strenuous work or exercise. Nearby development includes primarily warehouses and some vacant lots. The nearest sensitive receptor

is a single-family residence located approximately 0.25 mile southeast of the project site on Nance Street.

This single-family residence is not close enough to the project site to experience substantial air quality impacts from the project either during construction or operation. The South Coast AQMD developed the localized significance threshold (LST) methodology to determine whether or not a project may generate significant adverse localized air quality impacts. An LST analysis is employed as a screening tool to determine if there is a potential for air quality impacts to nearby sensitive receptors. LSTs are developed based upon the size or total area of the emissions source, the ambient air quality in the subject area, and the distance to the sensitive receptor. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area. When a receptor is close to a project site it's possible to have an LST impact even though the South Coast AQMD construction emission thresholds have not been violated. The further the source is from the receptor the greater emissions must be in order to cause an impact, and at 500 meters (approximately 0.31 mile), the furthest distance considered in LSTs, emissions must exceed the standard construction emission thresholds in order to create an impact.[1] As shown in Table 2 the project's estimated maximum daily construction emissions fall well below the construction emission thresholds and therefore would not approach the level necessary to create an LST impact.

Another potential construction-related impact to sensitive receptors would be diesel particulate matter, a toxic air contaminant produced by diesel engines, which includes heavy-duty construction equipment. However, any measurable diesel particulate matter from the project would occur only for a brief period during construction hours when heavy duty equipment is in use. The dissipation of diesel particulate matter into the atmosphere from a piece of equipment traveling to different parts of the site for a few hours in a day, for a period of a few weeks, would not create significant impacts 0.25 mile from the site.

Operations will not result in impacts to sensitive receptors as the project consists of three business park office buildings, and all activity at such facilities must be conducted within an enclosed building. Any sort of permitted use that might produce emissions would be limited to what can be accommodated within an enclosed building where emissions are filtered through HVAC systems or directed through specialty exhaust systems, subject to health and safety requirements pertaining to the occupancy of the building and the use in question. Truck traffic in the vicinity of the site would increase but would not result in localized impacts. The General Plan Circulation Element, Zoning Ordinance, and PVCCSP were amended in 2021 to eliminate Perris Boulevard as a designated truck route. Trucks are not allowed on Perris Boulevard and are subject to citation. The project's contribution of 284 trips per day would not be enough to significantly impair the roadway or intersections to a degree where congestion generates localized air quality issues at the sensitive receptor.

PVCCSP EIR mitigation measure MM Air 15 requires that facility-specific Health Risk Assessments be performed to assess the diesel particulate matter impacts from mobile-source traffic generated by 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 transport refrigeration units (TRUs) per day, or TRU operations exceeding 300 hours per week, and that are subject to CEQA

[1] South Coast AQMD, Final Localized Significance Threshold Methodology, Appendix C - Mass Rate LST Look-up Table, Revised October 21, 2009.

and are located adjacent to sensitive land uses. The proposed project would not meet any of these standards and, as such, PVCCSP EIR mitigation measure MM Air 15 is not applicable to the project. The project would not generate substantial truck trips (an estimated 98 per day, based on the Focused Traffic Impact Analysis for the project), fewer than the threshold set forth in PVCCSP EIR mitigation measure MM Air 15, so it would not pose a significant health risk impact.

d. Odor Impacts. *Less Than Significant Impact.* Land uses typically associated with objectionable odors that can potentially adversely affect a substantial number of people include certain types of agriculture, sewage treatment plants, landfills, green waste facilities, recycling facilities, petroleum refineries, chemical manufacturing, rendering plants, and certain types of food manufacturing. Within the proposed PD overlay in a commercial zone, all activity must occur within an enclosed building, and the sort of uses that might produce objectionable odors are either not allowed or allowed only by a Conditional Use Permit (CUP). The CUP process would address the potential of the proposed use to produce objectionable odors and would apply conditions to address such odors if they were anticipated.

During construction, the application of certain materials (i.e., asphalt, paints, etc.) may generate odors within various portions of the site that would be temporary in nature and are common to construction projects. For operations, the project will include enclosure for trash and recyclable bins, to be emptied on a regular basis. As described above, the project site is surrounded by industrial uses and open spaces, and there are no sensitive receptor land uses in the immediate vicinity of the project site. The fact that all activity on site will take place within an enclosed building, any uses that might produce objectionable odors would only be permitted through the CUP process, and there are no sensitive receptors near the facility would result in a less than significant impact regarding the potential to generate objectionable odors that adversely affect a substantial number of people, and odor impacts of the project during construction and operation would be less than significant.

Findings and Mitigation: Air quality impacts would be less than significant. However, as noted above, the project would nevertheless be required to comply with the following PVCCSP EIR mitigation measures. In the PVCCSP EIR, the South Coast AQMD is referred to as the SCAQMD and the U.S. Environmental Protection Agency is referred to as the USEPA.

> **MM Air 2:** Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.
>
> **MM Air 3**: To reduce fugitive dust emissions, the development of each individual implementing development project shall comply with SCAQMD Rule 403. The developer of each implementing project shall provide the City of Perris with the SCAQMD-approved dust control plan, or other sufficient proof of compliance with Rule 403, prior to grading permit issuance. Dust control measures shall include, but are not limited to:

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

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

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

MM Air 6: The developer of each implementing development project shall require, by contract specifications, the use of alternative fueled off-road construction equipment, the use of construction equipment that demonstrates early compliance with off-road equipment with the CARB in-use off-road diesel vehicle regulation (SCAQMD Rule 2449) and/or meets or exceeds Tier 3 standards with available CARB verified or USEPA certified technologies. Diesel equipment shall use water emulsified diesel fuel such as PuriNO_x unless it is unavailable in Riverside County at the time of project construction activities. Contract specifications shall be included in project construction documents, which shall be reviewed by the City of Perris Building Division prior to issuance of a grading permit.

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

MM Air 8: Each individual implementing development project shall apply paints using either high volume low pressure (HVLP) spray equipment with a minimum transfer

efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.

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

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

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

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

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

MM Air 21: Each implementing development project shall be encouraged to implement, at a minimum, an increase in each building's energy efficiency 15 percent beyond Title 24,

and reduce indoor water use by 25 percent. All reductions will be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project result in:				
a) Have a substantial adverse effect on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
c) Have a substantial effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?		X		

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

There are no PVCCSP Standards and Guidelines applicable to the analysis of biological resources for the proposed project. Developments within the PVCC area are subject to PVCCSP EIR mitigation measures MM Bio 1 through MM Bio 6. A Biological Reconnaissance Survey was prepared for the original project approval. By preparing the Biological Reconnaissance Survey, the development of the project site has complied with PVCCSP EIR mitigation measure MM Bio 6. The remaining PVCCSP EIR mitigation measures that are applicable to the proposed project are incorporated into the following analysis.

a. Impacts to Special Status Species and Habitat. *Less Than Significant With Mitigation.* A habitat assessment (burrowing owl, general biological reconnaissance) and Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) consistency analysis was conducted on May 6, 2016. The assessment included a physical survey of the site which determined that no burrowing owls or suitable burrows were located on site, and overall the site was "completely lacking in habitat for plants and wildlife." The project site was disked and mostly lacking in any vegetation cover. Therefore no impacts to sensitive biological resources are anticipated. However, in accordance with PVCCSP mitigation measure MM Bio 2 and the requirements of the MSHCP, a pre-construction survey would be required following project approval but prior to construction, and in the event any owls are seen at that time, protocols set forth in the MSHCP and mitigation measure will be followed. (Source: 11, 18)

Due to the absence of trees and/or water, the project site does not provide suitable habitat for nesting migratory birds. As such, the project does not have the potential to impact nesting migratory birds and PVCCSP EIR mitigation measure MM Bio 1 is not applicable to the project.

The project site is located within the Western Riverside MSHCP burrowing owl survey area, which requires a pre-construction MSHCP protocol survey for burrowing owl. The burrowing owl is considered a California Department of Fish and Wildlife (CDFW) Species of Special Concern. Due to the lack of appropriate quality habitat created by the mass grading in the planted area (compacted soils), in addition to a lack of mammal burrows, no burrowing owls or suitable habitat were located within the project site. The project site does not contain suitable foraging habitat for raptors and/or burrowing owls. Although no burrowing owls were observed, they could potentially inhabit the project site in areas that were previously determined to be unoccupied. Therefore, as required by the MSHCP and PVCCSP EIR mitigation measure MM Bio 2 (as updated in project-specific mitigation measure MM BR-1 per direction from the CDFW), a 30-day pre-construction burrowing owl survey would be conducted immediately prior to the initiation of construction to confirm that the species is not present at the project site at that time. If burrowing owls are detected within or adjacent to the project site during the pre-construction survey, the burrowing owls shall be relocated/excluded from the site outside of the breeding season following accepted protocols, and subject to approval of the Regional Conservation Authority, the CDFW, and the U.S. Fish and Wildlife Service (USFWS).

b. and c. Riparian Habitat and Wetlands. *No Impact.* The site does not contain riparian/riverine, vernal pool, or any similar areas that might provide habitat for sensitive riparian birds or fairy shrimp species, and was determined to be devoid of habitat value for plants and wildlife. The project is completely isolated from any natural drainage system as defined by the California Department of Fish and Game Code. No impact would occur and PVCCSP EIR mitigation measures MM Bio 3 through MM Bio 5 would not be applicable to the project. (Source: 1, 3, 11, 18)

d. Wildlife Movement. *No Impact.* Habitat fragmentation occurs when a proposed action results in a single, unified habitat area being divided into two or more areas, such that the division isolates the two new areas from each other. Isolation of habitat occurs when wildlife cannot move freely from one portion of the habitat to another or from one habitat type to another. An example is the fragmentation of habitats within and around clustered residential development. No wildlife corridor, established native resident, or native wildlife nursery site exists on the subject site. The project site is not within any proposed or existing Cores or Linkages as identified in the MSHCP.

The project site is not in proximity to any known wildlife corridors. Due to the disturbed condition of the project site, the complete lack of habitat, the nature of adjacent development, and the intervening presence of roadways and infrastructure, development of the proposed project would not result in habitat fragmentation or substantially affect established wildlife corridors or wildlife movement. Therefore no impact associated with this issue would occur and no mitigation would be required. (Sources: 1, 11, 18)

e. and f. Consistency with Plans, Policies, and Habitat Conservation Plans. *Less Than Significant With Mitigation Incorporated.* The project would be in compliance with the provisions of an adopted Habitat Conservation Plan to protect biological resources in the region. The MSHCP was adopted by the City of Perris on September 30, 2003. The MSHCP is a comprehensive multi-jurisdictional habitat conservation planning program that provides a regional approach to conservation planning. The MSHCP addresses the needs of multiple species, including habitat, and the preservation of native vegetation in Western Riverside County. The MSHCP also provides the framework for assembly of Conservation Areas that consist of Core Areas and Linkages for the conservation of identified Covered Species. The Conservation Areas are assembled from 160-acre quarter sections known as Criteria Cells. Each Criteria Cell has specific criteria for species conservation.

The project site is also located within the Mead Valley Area Plan, which encompasses Perris City limits and surrounding communities. The project site is located within the MSHCP plan area but not within an identified MSHCP Reserve, MSHCP Criteria Cell, or any habitat linkage. Furthermore, the project site is not located within an MSHCP mammal or amphibian survey area, Criteria Area Plant Species Survey Area (CAPSSA), Narrow Endemic Plant Species Survey Area (NEPSSA), or a riparian, wetland, or vernal pool habitat/species survey area.

A habitat survey was conducted in 2017 for the Burrowing Owl, a Species of Special Concern within the region. The survey found that the project site was highly disturbed and without habitat, foraging or nesting opportunities for the Burrowing Owl. Site conditions have not changed since 2017, except that it is disked periodically, and remains in a disturbed condition. As discussed above and as required by the MSHCP and PVCCSP EIR mitigation measure MM Bio 2 (as updated in project-specific mitigation measure MM BR-1 per direction from the CDFW), a 30-day pre-construction burrowing owl survey would be conducted immediately prior to the initiation of construction to confirm that the species is not present at the project site at that time. If burrowing owls are detected within or adjacent to the project site during the pre-construction survey, the burrowing owls shall be relocated/excluded from the site outside of the breeding season following accepted protocols, and subject to approval of the Regional Conservation Authority, the CDFW, and the USFWS. The project would also be required to pay MSHCP fees and Kangaroo Rat Habitat fees upon building permit issuance. Therefore, potential impacts would be less than significant with mitigation. (Source: 11, 18)

Findings and Mitigation: The following project-specific mitigation measure replaces PVCCSP EIR mitigation measure MM Bio 2 per direction from the CDFW:

> **MM BR-1**: The project proponent shall retain a qualified biologist to conduct a pre-construction survey for resident burrowing owls within 30 days prior to commencement of grading and construction activities on the Project site. The survey shall include the project site and all suitable burrowing owl habitat within a 500-foot buffer. The results of the survey shall be submitted to the City prior to obtaining a grading permit. If ground disturbing activities in

these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity will be conducted in accordance with the current Burrowing Owl Survey Instructions for the Western Riverside MSHCP.

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

If burrowing owls occupy the project site after project activities have started, then construction activities shall be halted immediately. The project proponent shall notify the City 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.

ISSUES:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
V. CULTURAL RESOURCES - Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		X		
d) Disturb any human remains, including those interred outside of formal cemeteries?		X		

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

There are no PVCCSP Standards and Guidelines applicable to the analysis of cultural resources for the proposed project. The PVCCSP EIR mitigation measures that are applicable to the proposed project are incorporated into the following analysis.

a. and b. Historical and Archaeological Resources. *Less Than Significant With Mitigation Incorporated.* The project site is located in area of the City considered to have low probability for encountering cultural resources. As required by PVCCSP EIR mitigation measure MM Cultural 1, a field survey of the project site and records search at the EIC University of California, Riverside, by L & L Environmental, Inc., dated June 14, 2016, did not identify any documented historic resources within or immediately adjacent to the project site. The findings suggest there is a low probability that prehistoric or historic age cultural resources will be encountered during project-related ground disturbance. Archaeological monitoring was not recommended by L & L Environmental. Since the site conditions have not substantially changed since 2016, no further survey work is necessary at the present time.

Nonetheless, there is the potential that previously unidentified archaeological resources may be discovered during construction-related ground disturbance for the project. In addition, construction workers are generally not trained in the identification of cultural resources. Therefore, project-specific mitigation measure MM CR-1 shall be implemented to reduce potential impacts related to archaeological resources to a less than significant level. Project-specific mitigation measure MM CR-1 replaces PVCCSP EIR mitigation measures MM Cultural 2, MM Cultural 3, and MM Cultural 4 as subsequently revised by the City of Perris.

d. Impacts to Human Remains. *Less Than Significant With Mitigation Incorporated*. The proposed project site has previously been used for agriculture purposes. No known cemetery has occurred at this site, so it is not expected to contain human remains, including those interred outside of formal cemeteries. However, the potential exists for previously unknown human remains to be discovered at the project site during project construction activities. Project-specific mitigation measure MM CR-2 shall be implemented to ensure that any human remains that might be discovered at the project site are treated appropriately pursuant to Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the California Public Resources Code. (CHSC). Project-specific mitigation measure MM CR-2 replaces PVCCSP EIR mitigation measure MM Cultural 6 as subsequently revised by the City of Perris. With adherence to existing laws and regulations, and implementation of mitigation measure MM CR-2, potential impacts with regard to the disturbance of human remains would be less than significant.

Findings and Mitigation: The following project-specific mitigation measures MM CR-1 and MM CR-2 replace PVCCSP EIR mitigation measures MM Cultural 2, MM Cultural 3, MM Cultural 4, and MM Cultural 6 as subsequently revised by the City of Perris:

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

developer and the City of Perris in a timely manner. The archaeologist shall be prepared and equipped to record and salvage cultural resources that may be unearthed during ground-disturbing activities and shall be empowered to temporarily halt or divert ground-disturbing equipment to allow time for the recording and removal of the resources.

In the event that archaeological resources are discovered at the project site or within 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 shall commit to the relinquishing and curation of all artifacts identified as being of Native American origin. All artifacts, Native American or otherwise, discovered during the monitoring program shall be recorded and inventoried by the consulting archaeologist.

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

In the event that human remains are discovered at the project site or within off-site project improvement areas, mitigation measure CR-2 shall immediately apply and all items found in association with Native American human remains shall be considered grave goods or sacred in origin and subject to special handling.

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

Native American artifacts that cannot be avoided or relocated at the project site shall be prepared for curation at an accredited curation facility in Riverside County that meets federal standards (per 36 CFR Part 79) and available to archaeologists/researchers for further study. The project archaeologist shall deliver the Native American artifacts, including title, to the identified curation facility within a reasonable amount of time, along with applicable fees for permanent curation.

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

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

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

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

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

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

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY - Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

There are no specific policies related to energy conservation identified within the PVCCSP. However, the PVCCSP EIR includes various mitigation measures to ensure that projects located within the PVCCSP area identify air quality impacts from construction and operation and mitigate any potential impacts appropriately. Project-specific and relevant mitigation measures from the PVCCSP EIR which address both potential regional and local air quality impacts are included under Section III Air Quality, of this Initial Study.

Building Energy Efficiency Standards

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, which became effective on January 1, 2023. The 2022 Title 24 standards include efficiency improvements to the lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers.

The 2022 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, went into effect on January 1, 2023. The 2022 CALGreen Code includes mandatory measures for non-residential development related to site development; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. Specifically, the code requires the following measures that are applicable to energy use:

New buildings with tenant spaces that have 10 or more tenant-occupants to provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility.

New buildings that require 10 or more parking spaces to provide a specific number of spaces to facilitate the present and future installation of electric vehicle supply equipment. The raceways are required to be installed at the time of construction.

Senate Bill 100

Senate Bill 100 (SB 100) was signed into law September 2018 and increased the goal of the California RPS Program to achieve at least 50 percent renewable resources by 2026, 60 percent

renewable resources by 2030, and 100 percent renewable resources by 2045. SB 100 also includes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

California is one of the lowest per capita energy users in the United States, ranked 48th in the nation, due to its energy efficiency programs and mild climate (United States Energy Information Administration [EIA] 2018). California consumed 292,039 gigawatt-hours (GWh) of electricity and 2,110,829 million cubic feet of natural gas in 2017 (California Energy Commission [CEC] 2019; EIA 2018). In addition, Californians consume approximately 18.9 billion gallons of motor vehicle fuels per year (Federal Highway Administration 2019). The single largest end-use sector for energy consumption in California is transportation (39.8 percent), followed by industry (23.7 percent), commercial (18.9 percent), and residential (17.7 percent) (EIA 2018).

Most of California's electricity is generated in-state with approximately 30 percent imported from the Northwest (Alberta, British Columbia, Idaho, Montana, Oregon, South Dakota, Washington, and Wyoming) and Southwest (Arizona, Baja California, Colorado, Mexico, Nevada, New Mexico, Texas, and Utah) in 2017. In addition, approximately 30 percent of California's electricity supply comes from renewable energy sources such as wind, solar photovoltaic, geothermal, and biomass (CEC 2018). Adopted on September 10, 2018, SB 100 accelerates the State's Renewables Portfolio Standards Program by requiring electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

To reduce statewide vehicle emissions, California requires that all motorists use California Reformulated Gasoline, which is sourced almost exclusively from refineries located in California. Gasoline is the most used transportation fuel in California with 15.5 billion gallons sold in 2017 and is used by light-duty cars, pickup trucks, and sport utility vehicles (California Department of Tax and Fee Administration 2018). Diesel is the second most used fuel in California with 4.2 billion gallons sold in 2015 and is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy- duty construction and military vehicles (CEC 2016). Both gasoline and diesel are primarily petroleum- based, and their consumption releases greenhouse gas (GHG) emissions, including carbon dioxide and nitrogen oxides. The transportation sector is the single largest source of GHG emissions in California, accounting for 41 percent of all inventoried emissions in 2016 (California Air Resources Board [CARB] 2018).

a. Energy Consumption Related Impacts. *Less Than Significant Impact.* The project would not result in potentially significant environmental impacts resulting from wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. The following summarizes the energy analysis included in Appendix A to this document.

Construction

During construction, the project would use heavy-duty equipment associated with site preparation, grading, and paving, and large trucks for delivery of supplies and equipment. Construction equipment used on-site is listed above in Table 6 and the majority of the equipment would likely be diesel-fueled. However, smaller equipment such as welders and pumps may be electric-,

gasoline-, or natural gas-fueled, but these are assumed to be diesel in the analysis below in order to produce conservative results.

According to the CARB on-road vehicle emissions factor model EMFAC2021(v1.0.2), Emissions Inventory, the average fuel economy for light duty vehicles operating in Riverside (SC) Sub-Area for the year 2024 is approximately 24.99 miles per gallon for gasoline-fueled vehicles and approximately 8.19 miles per gallon for all categories of diesel-fueled vehicles. Based on these modeled emissions factors; worker, vendor, and hauling trips; and off-road construction equipment generated by CalEEMod, the project consumption of diesel and gasoline during construction was calculated and is shown below in **Table 4, Fuel Consumption During Construction**. The calculations are provided in the Energy Consumption Worksheet in the report included as Appendix A to this document.

As shown below in Table 4, based on the CARB on-road vehicle emissions factor model EMFAC2021(v.1.0.2) and Energy Consumption Worksheet, project construction would consume a total of 45,271 gallons of diesel fuel and 5,263 gallons of gasoline per year. In 2023, 13.6 billion gallons of gasoline and 3.0 billion gallons of diesel, including off-road diesel, was sold in California. Construction-related gasoline and diesel fuel use for the project would result in less than 0.01 percent of the fuel consumption in California. As such, the use of construction equipment and the transportation of materials and workers necessary during the temporary construction period would not represent a substantial proportion of annual gasoline or diesel fuel use in California.

Adherence to CCR Section 2485 and CARB anti-idling regulations for off-road diesel-fueled fleets would reduce the potential for wasteful use of energy by construction equipment. Due to the temporary duration of construction and the necessity of fuel consumption inherent in construction projects, fuel consumption would not be excessive or substantial with respect to fuel supplies. The energy demands associated with fuel consumption during construction would be typical of projects of this size and would not necessitate additional energy facilities or distribution infrastructure or cause wasteful, inefficient or unnecessary consumption of energy. Therefore, the project's potential to result in environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during construction would be less than significant.

Operations

During operations, the project would consume energy for vehicle trips, water conveyance, wastewater treatment, lighting, and to operate electronic equipment and devices and HVAC systems. This will generate demand from utilities; electricity from Southern California Edison (SCE) and natural gas from Southern California Gas (SoCalGas). According to the California Energy Commission, Riverside County consumed 17,780.6 millions of kilowatt hours (kWh) of electricity in 2022, and 431.1 millions of therms of natural gas. The project's estimated energy use during operations is summarized below in **Table 5, Project Operations Energy Use**.

Table 4. Fuel Consumption During Construction

Energy Source	Construction Fuel Demand per Year
Transportation Fuels [a]	
Gasoline	
On-road Worker Trips	5,263 gallons
Gasoline Total	**5,263 gallons**
Diesel	
On-road Haul Trucks [b]	1,146 gallons
On-road Vendor Trucks [b]	3,130 gallons
Off-road Construction Equipment [c]	40,995 gallons
Diesel Total	**45,271 gallons**

Source: Energy Consumption Worksheet, Appendix B.

[a] On-road mobile source fuel use based on VMT from CalEEMod and fleet-average fuel consumption in gallons per mile from EMFAC2021 web-based data for 2024 (construction year) for Riverside (SC) Sub-Area.

[b] Vendor and haul trucks are assumed to be diesel.

[c] All emissions from off-road construction equipment were assumed to be diesel. Off-road mobile source fuel usage based on a fuel usage rate of 0.05 gallons of diesel per horsepower (HP)-hour, based on the South Coast Air Quality Management District CEQA Air Quality Handbook, Table A9-3E.

Table 5. Project Operations Energy Use

Energy Source	Operations Energy Demand per Year
Electricity	1,163,215 kWh
Natural Gas	1.8 million kBtu / 18,396 therms
Transportation Fuels [a]	
Gasoline	29,462 gallons
Diesel	16,678 gallons

Source: CalEEMod Annual output sheets, included in Appendix A.

[a] Project gasoline and diesel use during operations are calculated based on the VMT estimated by CalEEMod Annual Output. It is assumed that light-duty vehicles use gasoline, while heavy-duty (Gross Vehicle Weight Rating > 8,500 pounds) use diesel. The project calculates light-duty vehicles account for approximately 84.6 percent of project VMT. Calculations shown in Energy Consumption Worksheet, provided in Appendix B. Project gasoline and diesel use are calculated based on fuel consumption factors for calendar year 2025 from EMFAC2021 (25.56 miles per gallon for gasoline-fueled vehicles and 8.22 miles per gallon for diesel-fueled vehicles).
kWh = kilowatt-hours
kBTU = kilo-British Thermal Units

As estimated by CalEEMod and shown in Table 5, the project's total electricity demand would be approximately 1,163,215 kWh/year which would represent approximately 0.07 percent of the county's yearly electricity demand, which is a negligible amount of total demand. Therefore, the project would not result in substantial increase in electricity demand. Total project demand for natural gas would be approximately 18,396 therms per year as estimated by CalEEMod outputs which would represent approximately 0.004 percent of the county's natural gas consumption rate, which is a negligible amount. Therefore, the project would not result in a substantial increase in demand for natural gas. The project will be required to comply with the 2022 California Energy Code and California Green Building Standards Code (CALGreen Code), which establish planning and design standards for sustainable development, energy efficiency, water conservation, and material conservation.

According to the CARB on-road vehicle emissions factor model EMFAC2021 (v1.0.2) Emissions Inventory, the average fuel economy for light duty vehicles operating in the Riverside (SC) Sub-Area for the year 2025 is approximately 25.56 miles per gallon for gasoline-fueled vehicles and approximately 8.22 miles per gallon for all categories of diesel-fueled vehicles. As shown in the Energy Consumption Worksheet provided in Appendix B, the project would generate approximately 890,041 VMT annually, 84.6 percent of which would comprise light-duty vehicles with a gross vehicle weight rating (GVWR) of up to 8,500 pounds, and approximately 15.4 percent of which would comprise heavy-duty vehicles (GVWR > 8,500 pound). Light-duty vehicles are considered to be gasoline powered and heavy-duty vehicles are considered to be diesel-fueled. As such, during operations the project would generate approximately 752,975 annual VMT with gasoline-fueled vehicles, and approximately 137,066 annual VMT with diesel- fueled vehicles. Based on the projected fleet fuel mileage for the year 2025, during operations the project's demand for transportation fuels would be approximately 29,462 gallons of gasoline, and approximately 16,678 gallons of diesel fuel, annually. According to the California Department of Tax and Fee Administration, 13.8 billion gallons of gasoline and 3.1 billion gallons of diesel fuel were sold in California in 2021, the majority of that being used for medium and heavy-duty commercial vehicles. The project's contribution to demand would equal 0.0002 percent of current demand for gasoline, and 0.0005 percent of the current demand for diesel fuel.

In summary, the project would result in the consumption of energy in the forms of electricity, natural gas, and transportation fuels at rates that represent only a negligible amount of current demand in the county. The project would be required to comply with federal, state, and local regulations aimed to reduce the inefficient, wasteful, and unnecessary consumption of energy. Conformance to these codes will ensure the project's buildings are designed to not require an excessive amount of energy to function and do not unnecessarily waste energy. Therefore, the project's energy requirements and its energy use efficiencies would result in a less than significant impact related to the wasteful, inefficient, and unnecessary consumption of energy.

b) Consistency with state or local energy plans. *Less Than Significant Impact.* The City would review project site plans to verify compliance with the Building and Energy Efficiency Standards in the California Energy Code prior to issuing a building permit. As a regulatory requirement, the project would be reviewed for consistency with applicable State and local plans for renewable energy and efficiency, including CALGreen Code Title 24 standards. CALGreen Code standards require projects to provide energy saving features, establish minimum standards for energy efficient construction practices, and require increased energy efficiency. The project would be built to the codes in effect at the time of construction. In addition, the project would provide the required bicycle parking spaces and EV accommodations (parking spaces that are EV-capable or EV-ready, as well as spaces with EV charging equipment installed) that meet or exceed requirements of CALGreen. As the project would comply with regulatory requirements for building efficiency and incorporate features that encourage a reduction in the use of gasoline-fueled vehicles, the project would not conflict with a state or local plan for renewable energy or energy efficiency.

Findings and Mitigation: All impacts would be less than significant without mitigation.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS - Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?				X
ii) Strong seismic ground shaking?			X	
iii) Inundation by seiche, tsunami, or mudflow?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil creating substantial risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

There are no PVCCSP Standard and Guidelines applicable to the analysis of geology and soils. By preparing the Geotechnical Evaluation for the original project, the development of the project site has complied with PVCCSP EIR mitigation measure MM Geo 1.

a.i. Earthquake Fault Rupture. *No Impact.* The subject property is not located within any Alquist-Priolo Study Zone or other area of known faults that would be subject to surface rupture. Therefore, no impact would occur. (Source: 1, 3)

a.ii. Seismic Ground Shaking. *Less Than Significant Impact.* The City of Perris is located in the general area of the San Jacinto and Elsinore faults, as identified in the General Plan Environmental Impact Report. The project site is located within an area of moderately high potential of ground shaking (Zone 3), as identified in the Figure 3-4 of the General Plan Environmental Impact Report and the Master Environmental Assessment. Any potentially significant impacts would be mitigated through building construction that is consistent with the California Building Code. Therefore, the potential impact would be less than significant. (Source: 1, 3, 9)

a.iii. Seiche, Tsunami and Mudflow. *Less Than Significant Impact.* Liquefaction occurs when loose saturated cohesion-less soils are subject to ground shaking during an earthquake of large magnitude. Factors influencing a site's potential for liquefaction include area seismicity, onsite soil type and consistency of groundwater level (water table less than 30 feet below ground surface). The Geotechnical Evaluation prepared for the project by EEI indicated that the water table was approximately 49 feet below the ground surface. The potential for earthquake-induced liquefaction

within the site is considered very low to remote due to the low groundwater level, recommended engineered fill, and dense nature of deeper onsite soils. Therefore, the potential impact would be less than significant. (Source: 9)

a.iv. Landslides. *No Impact.* The subject site is relatively flat and does not have steep slopes and undulating topography which has the potential for landslides. Therefore, no impact would occur. (Source: 9, 15)

b. Topsoil. *Less Than Significant Impact.* Construction activities have the potential to result in soil erosion or the loss of topsoil. However, erosion would be addressed through the implementation of existing State and Federal requirements and minimized through compliance with the National Pollutant Discharge Elimination System (NPDES) general construction permit, which requires that a Storm Water Pollution Prevention Plan (SWPPP) be prepared prior to and implemented during construction activities. The SWPPP will identify Best Management Practices to be implemented to address soil erosion. Through compliance with these standard regulatory requirements, the construction of the proposed project would not result in substantial soil erosion or the loss of topsoil. Therefore, construction-related impacts would be less than significant and no mitigation is required.

Once construction of the proposed project is complete, most of the project site would be paved and developed with buildings, a parking lot, and landscaping. Therefore, no soil erosion would occur from long-term operation of the project.

c. Unstable Soils. *No impact.* The project site and surrounding areas are generally flat to slightly sloping. The potential for landslides or slope instabilities to occur at the site is considered negligible. The proposed site will be graded, paved and landscaped to prevent erosion. Therefore, on-site erosion and/or loss of top soil would not occur. (Source: 8, 9)

d. Expansive Soils. *Less Than Significant Impact.* See comments a.iii and a.iv, above. The project site is not located on a geologic unit or soil that is unstable, or would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. Due to the lack of shallow groundwater at the property and the relative density of the materials beneath the property, the potential for liquefaction and dynamic settlement to occur is considered low. Soil analysis identified undocumented fill 4 to 5 feet below the ground surface overlying Quaternary- aged alluvial deposits. The undocumented fill materials are not considered suitable for support of buildings or additional loads, and are required to be removed. The alluvial deposits encountered are potentially expansive and need further evaluation during grading to determine if they are suitable for use as compacted fill. A conventional shallow foundation system in conjunction with a concrete slab- on-grade floor appears to be suitable for support of the proposed buildings. Any potentially significant impacts will be mitigated through building construction that is consistent with the California Building Code. Therefore, the potential impact would be less than significant. (Source: 9)

e. Suitability for Septic Systems. *No Impact.* The project site is located within the Eastern Municipal Water District (EMWD) service area and the project would connect to the existing EMWD sewer system. Septic systems or alternative wastewater systems would not be used and are prohibited. Therefore, no impact would occur. (Source: 1, 15, 16)

f. Paleontological Resources. *Less Than Significant With Mitigation Incorporated.* Based on the conclusions of the Phase 1 Cultural Assessment, less than significant impacts to paleontological are anticipated. (Source: 1, 3, 12) However, the project site is located within Paleontological Sensitivity Area 1 (High Sensitivity) as shown in Exhibit CN-7 of the City of Perris General Plan Conservation Element. Because of the high paleontological sensitivity assigned to the project site and the depth of potential ground disturbance, a Paleontological Resource Impact Mitigation Monitoring Program shall be prepared and approved in conformance with Conservation Element implementation measure IV.A.4 which requires paleontological monitoring of all projects within Paleontological Sensitivity Area 1 once subsurface excavation begins. This requirement is set forth in project-specific mitigation measure GS-1. The timing of this program would follow project approval, but be prior to the issuance of grading permits. Project-specific mitigation measure MM GS-1 replaces PVCCSP EIR mitigation measure MM Cultural 5 as subsequently revised by the City of Perris. With implementation of mitigation measure MM GS-1, potential impacts with regard to directly or indirectly destroying a unique paleontological resource or site or unique geologic feature would be reduced to a less than significant level.

Findings and Mitigation: All development of the site must follow standard California Building Code requirements. Compliance with these regulations and requirements and the recommendations contained in the Soils Investigation would result in less than significant geology related impacts. The Public Works Department/City Engineer will verify that the final project design incorporates any design recommendations from an approved project-specific geologic study prior to issuing grading permits. The following mitigation measure is required to address potential impacts related to encountering currently unidentified and unknown paleontological resources.

MM GS-1: Prior to the issuance of grading permits, the project proponent/developer shall submit to and receive approval from the City, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The PRIMMP shall include the provision of a qualified professional paleontologist (or his or her trained paleontological representative) to be on-site fulltime for any project-related subsurface excavation. Selection of the paleontologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the project site or within off-site project improvement areas until the paleontologist has been approved by the City.

Monitoring shall be restricted to undisturbed subsurface areas of older quaternary alluvium. The approved paleontologist shall be prepared to quickly salvage fossils as they are unearthed to avoid construction delays. The paleontologist shall also remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontologist shall have the power to temporarily halt or divert grading equipment to allow for removal of abundant or large specimens.

Collected samples of sediments shall be washed to recover small invertebrate and vertebrate fossils. Recovered specimens shall be prepared so that they can be identified and permanently preserved. Specimens shall be identified and curated and placed into an accredited repository (such as the Western Science Center or the Riverside Metropolitan Museum) with permanent curation and retrievable storage.

A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered specimens. The report and inventory, when submitted to the City

of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontological resources.

ISSUES:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS - Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

There are no PVCCSP Standard and Guidelines applicable to the analysis of greenhouse gas (GHG) emissions. However, the PVCCSP EIR includes various mitigation measures to ensure that projects located within the PVCC area identify air quality impacts from construction and operation and mitigate any potential impacts appropriately. Mitigation measures that reduce combustion emissions would also reduce associated GHG emissions. Applicable mitigation measures from the PVCCSP EIR which address both potential regional and local air quality impacts are included under Section III Air Quality, of this Initial Study.

Greenhouse Gas (GHG) Emissions Overview

Greenhouse gases (GHGs) emitted by human activity are implicated in global climate change. These GHGs contribute to an increase in the temperature of the earth's atmosphere by preventing long wavelength heat radiation in some parts of the infrared spectrum from leaving the atmosphere. For purposes of planning and regulation, Section 15364.5 of the California Code of Regulations defines GHGs as including carbon dioxide (CO_2), carbon monoxide (CO), nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Carbon dioxide is the primary GHG emitted in California, accounting for 84 percent of total GHG emissions in 2015. Because the warming potential of the identified GHGs differ, GHG emissions are typically expressed in terms of CO_2 equivalents (CO_2e), providing a common expression for the combined volume and warming potential of the GHGs generated by a particular emitter. The total GHG emissions from individual sources are generally reported in metric tons (MT) and are expressed as MT of CO_2e (MTCO2e).

Fossil fuel combustion in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of GHG emissions, accounting for approximately half of GHG emissions globally. The transportation sector, primarily on-road travel, is the single largest source of CO_2 emissions in California. Additionally, about 50 percent of the industrial source emissions of CO_2 are from the refinery and oil and gas sectors. When the industrial source

emissions from the oil and gas sectors are attributed to the transportation sector, the emissions associated with transportation amount to approximately half of statewide GHG emissions.

Regulatory Setting

The following includes a summary of relevant federal, state, and local regulations associated with GHG emissions. Please refer to Attachment A of this Initial Study for a full discussion of the regulatory framework for this issue.

Federal Clean Air Act

The U.S. Environmental Protection Agency (EPA) is responsible for implementing federal policy to address GHGs. In Massachusetts v. EPA (549 US 497 [2007]) the U.S. Supreme Court found that CO_2 and other GHGs are pollutants under the Clean Air Act and could be regulated by the EPA. The Court did not require the EPA to regulate GHG emissions, but indicated the agency must decide whether GHGs cause or contribute to air pollution that is reasonably anticipated to endanger public health or welfare.

State of California

Executive Order S-3-05

Former Governor Schwarzenegger's 2005 Executive Order S-3-05 included the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. To meet the targets, the Governor directed several state agencies to cooperate in the development of a CAP. The Secretary of the California Environmental Protection Agency (CalEPA) leads the Climate Action Team, whose goal is to implement global warming emission reduction programs identified in the CAP and to report biannually on the progress made toward meeting the emission reduction targets established in the Executive Order.

Assembly Bill 32, The Global Warming Solutions Act of 2006

California Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006, provided authorization to CARB to develop regulations and market mechanisms to reach the GHG emissions goals established by Executive Order S-3-05 in 2005. Pursuant to AB 32, CARB identified 427 million $MTCO_2e$ as the total statewide aggregated 1990 GHG emissions level, which served as the 2020 emissions limit. The state achieved its 2020 GHG emissions reductions target of returning to 1990 levels in 2016.

Executive Order B-30-15

In 2015, Governor Brown issued Executive Order B-30-15, which created an interim statewide GHG emission reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030, replacing the 2005 target.

Senate Bill 32, California Global Warming Solutions Act of 2016

California Senate Bill 32 (SB 32), the California Global Warming Solutions Act of 2016: emissions limit, was passed in 2016 as a follow-up to AB 32, authorizing CARB to create regulations in pursuit of the GHG emissions target set in the 2015 executive order.

Executive Order B-55-18
Executive Order B-55-18, issued by Governor Brown in 2018, established a statewide policy goal to achieve carbon neutrality as soon as possible and no later than 2045, and to achieve and maintain net negative emissions thereafter. The Order states that this new goal is in addition to the prior statewide targets for reduction of GHG emissions.

Assembly Bill 1279, California Climate Crisis Act
Assembly Bill 1279, known as the California Climate Crisis Act, was enacted September 16, 2022. It codifies previous executive orders by requiring California to achieve net zero greenhouse gas emissions as soon as possible, but no later than 2045, and to achieve and maintain net negative GHG emissions thereafter. It also requires that statewide anthropogenic GHG emissions be reduced to at least 85 percent below 1990 levels by 2045.

Climate Change Scoping Plan
As required by AB 32, CARB was tasked with preparing a scoping plan that identified strategies for reducing GHG emissions. The first Climate Change Scoping Plan was adopted in December 2008 and gets updated every 5-years. So far there have been three updates on the Scoping Plan. Each update builds upon the existing strategies and recommendations from the previous plan and identifies opportunities to leverage existing and new funds.

The 2022 Climate Change Scoping Plan was finalized in December 2022 and is focused on the goal of obtaining carbon neutrality by 2045 or earlier. This is the first updated Scoping Plan that has added carbon neutrality as a science-based guide where it identifies technologically feasible, cost effective and equity-focused path to carbon net zero. GHG emission targets set in the Scoping Plan are attained in part through regional sustainable communities strategies developed by the metropolitan planning organizations.

Senate Bill 375
Senate Bill 375, the Sustainable Communities and Climate Protection Act, passed in 2008, requires CARB to develop and set regional targets for GHG emission reductions from passenger vehicles. Targets are set regionally for each of the 18 metropolitan planning organization regions. Each metropolitan planning organization is required to develop a Sustainable Communities Strategy that will reduce GHG emissions to achieve the regional targets. The Sustainable Communities Strategy is a component to the Regional Transportation Plan, which regulates transportation financing in each region. The Regional Transportation Plan and Sustainable Communities Strategy must complement each other and accommodate the Regional Housing Needs Allocation. The bill modified the Regional Housing Needs Allocation requirements to align with production of the Regional Transportation Plan /Sustainable Communities Strategy. The purpose of this is for each metropolitan planning organization to arrive at a mix of transportation and land use strategies that will direct the region's growth in such a way that emissions from car trips meet the GHG reduction targets.

Senate Bill 743
Senate Bill 743, passed in 2013, established that CEQA transportation impacts would no longer be measured by level of service (LOS), but rather by vehicle miles traveled (VMT). This eliminated vehicle delay as an environmental impact and complemented the purposes of SB 375.

Regional/Local

Connect SoCal

The Southern California Association of Governments (SCAG) is the metropolitan planning organization for the County of Riverside (along with the Counties of Imperial, San Bernardino, Los Angeles, Orange, and Ventura). Connect SoCal is SCAG's Regional Transportation Plan/Sustainable Communities Strategy for integrating the transportation network and related strategies with an overall land use pattern to accommodate projected growth, housing needs, and transportation demands. Connect SoCal demonstrates the region's ability to attain and exceed the state's GHG emission reduction targets. Connect SoCal 2020 has been found to meet the state targets for reducing GHG emissions from cars and light trucks, as it achieves per capita GHG emission reductions relative to 2005 levels of eight percent in 2020, and 19 percent in 2035, which meet the GHG reduction targets that were established by CARB for the SCAG region. An updated Connect SoCal was adopted by SCAG in 2024, but as it has not yet been reviewed and certified by CARB, Connect SoCal 2020 remains the proper document for analysis purposes.

On October 30, 2020, CARB officially determined that Connect SoCal 2020 would achieve CARB's 2035 GHG emission reduction target of 19 percent below 2005 per capita emissions levels.

Western Riverside Council of Governments (WRCOG)

The Western Riverside Council of Governments (WRCOG) is a member organization representing Riverside County cities and agencies that facilitates cooperative planning, coordination, and technical assistance on issues of mutual concern amongst jurisdictions. In 2014 WRCOG passed a Climate Action Plan, dubbed CAPtivate: A Healthy Western Riverside County, which established subregional GHG emissions targets of 15% below 2010 levels by 2020 and 49% below 2010 levels by 2035. The CAP did not have binding provisions upon member agencies but provided a cooperative framework and context for local action.

City of Perris Climate Acton Plan

The City of Perris Climate Action Plan adopted in February 2016 was modeled on the WRCOG CAP. The CAP was intended to address the 2020 emission targets and included measures for the City to take. As the CAP only addressed 2020 emission targets and included actions for the municipality to take, it would not be applicable to current development.

Significance Thresholds

Based on the State CEQA Guidelines Appendix G thresholds of significance, a project would have a potentially significant GHG impact if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
- Conflict with an applicable plan, policy or regulation adopted to reduce GHG emissions.

Because individual projects do not generate sufficient GHG emissions that would substantially affect climate change; the issue of climate change typically involves an analysis of whether a project's contribution toward an impact is cumulatively considerable. As defined by *State CEQA Guidelines* Section 15355, "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other

current projects, and probable future projects.

State CEQA Guidelines Section 15064.4(a) states that a lead agency shall have discretion to determine, in the context of a particular project, whether to:

1) Quantify greenhouse gas emissions resulting from a project; and/or
2) Rely on a qualitative analysis or performance based standards.

Additionally, the Section 15064.4(b) states that "In determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change," and that the following factors should be considered:

1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (see, e.g., section 15183.5(b)).

State CEQA Guidelines Section 15064.4 does not establish a threshold of significance for GHG emissions. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies or suggested by other experts (see *State CEQA Guidelines* Section 15064.7(c)). Pursuant to *State CEQA Guidelines* Section 15064.7(b), "Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence." Neither the City nor the South Coast AQMD have adopted a numeric threshold for the analysis of GHG impacts. In the absence of any applicable adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with *State CEQA Guidelines* Section 15064.4(b)(3) by considering the "extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (see, e.g., section 15183.5(b))."

a. Greenhouse Gas Generation. *Less Than Significant Impact.* During the construction of the project, equipment and vehicles would be used that will generate greenhouse gases in small amounts. It is known that concentrations of CO_2 in the atmosphere result in global climate change and may contribute to adverse environmental effects including sea level rise, loss of snowpack, and severe weather events.

As discussed above, there is no bright-line numeric threshold for determining the potential significance of GHG emissions that would be applicable to the proposed project. However, pursuant to *State CEQA Guidelines* Section 15064.4(a), which states that "A lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project," the project's estimated annual GHG emissions were calculated using CalEEMod 2022.1.1.21, which are

presented for discussion purposes. The CalEEMod output data for the proposed project, which also reports input data of project details that were used in the model, is provided in Appendix A.

Construction GHG Emissions
As estimated using CalEEMod 2022.1.1.13, the project's construction activities would generate a total of approximately 375.1 MT CO_2e emissions. As construction emissions occur for a limited period of a project's lifetime, as a standard practice, GHG emissions from construction are amortized over a presumed project lifetime. A project lifetime of 30 years is recommended by South Coast AQMD for amortizing construction-related GHG emissions.[2] The proposed project's amortized construction-related emissions would therefore be 12.5 MT CO_2e. The amortized construction emissions have been added to the project's annual operational GHG emissions as shown in the following discussion.

Operational GHG Emissions
During operations, the project would generate GHG emissions from area sources, energy use, mobile, water use, and waste disposal. The project's estimated GHG emissions are shown in the CalEEMod report provided in Appendix A. Area sources include emissions from consumer product use (such as cleaning supplies), architectural coatings such as paints (averaged on an annual basis assuming all surface areas are repainted once every 10 years), and landscape maintenance equipment (i.e., lawn mowers, leaf blowers, etc.). Energy sources include electricity and natural gas use.

Mobile sources include on-road motor vehicle use by employees, customers, guests, etc. Vehicle emission factors used in CalEEMod are based on EMFAC2021. Linscott, Law & Greenspan produced project trip generation rates for the project which were used to modify the vehicle fleet mix in the CalEEMod program with 83.1 percent of trips from passenger cars, 2.82 percent from two-axle trucks, 3.5 percent from three-axle trucks, and 10.58 percent from four-axle trucks. The calculated trip generation rate matched the default produced by the CalEEMod program, therefore, trip generation was not modified. The combination of trip generation and vehicle fleet mix data is used to estimate the CO2e emissions associated with on-road motor vehicle use.

Table 6, Annual Greenhouse Gas Emissions, summarizes the estimated operational emissions as well as the amortized construction emissions based on the CalEEMod output files provided in technical report.

Table 6. Annual Greenhouse Gas Emissions

Generation Source	MT CO_2e/year
Project Emissions	
Area Sources	1.4
Energy Utilization	295.0
Mobile Source [b]	420.5
Offroad	0.0
Solid Waste Generation	25.8
Water Consumption	38.1
Construction (Amortized)	12.5
Total Project Operational Emissions	**793.3**
Source: CalEEMod Report, January 2024 (Appendix A) Note: Totals may differ due to rounding.	

[2] South Coast AQMD, Draft Guidance Document – Interim CEQA GHG Significance Threshold, October 2008.

For GHG emissions and global warming, there is not, at this time, one established, universally agreed-upon "threshold of significance" by which to measure an impact. While CARB published some draft thresholds in 2008, they were never adopted, and CARB recommended that local air districts and lead agencies adopt their own thresholds for GHG impacts.

The South Coast AQMD has been evaluating GHG significance thresholds since April 2008. In December 2008, the South Coast AQMD adopted an interim 10,000 $MTCO_2e$ per year screening level threshold for stationary source/industrial projects for which the South Coast AQMD is the lead agency. The South Coast AQMD has continued to consider adoption of significance thresholds for residential and general development projects. The most recent proposal issued in September 2010 included significance thresholds for residential, commercial, and mixed-use projects at 3,500, 1,400, and 3,000 $MTCO_2e$ per year, respectively. Alternatively, a lead agency has the option to use 3,000 $MTCO_2e$ per year as a threshold for all non-industrial projects. Although both options are recommended by the South Coast AQMD, a lead agency is advised to use only one option and to use it consistently.

The thresholds identified above have not been adopted by the South Coast AQMD or distributed for widespread public review and comment, and the working group tasked with developing the thresholds has not met since September 2010. The future schedule and likelihood of threshold adoption is uncertain. The only update to the South Coast AQMD's GHG thresholds since 2010 is that the 10,000 $MTCO_2e$ per year threshold for industrial projects is now included in the South Coast AQMD's March 2023 South Coast AQMD Air Quality Significance Thresholds document that is published for use by local agencies.

In the absence of other thresholds of significance promulgated by the South Coast AQMD, the City of Perris has been using the South Coast AQMD's 10,000 $MTCO_2e$ per year threshold for industrial projects and the draft thresholds for non-industrial projects the purpose of evaluating the GHG impacts associated with proposed general development projects. Other lead agencies through the Basin have also been using these adopted and draft thresholds. Therefore, in accordance with the South Coast AQMD's thresholds for non-industrial land use types (i.e. Option 2), a threshold of 3,000 $MTCO_2e$ per year is utilized for the analysis herein.

As shown in Table 6, total GHG emissions from the project are below the South Coast AQMD recommended screening level threshold of 3,000 MTCO2e per year for non-industrial projects. Therefore, the proposed project would not generate GHG emissions, directly or indirectly, that have a significant effect on the environment. Although not considered to be significant, implementation of the applicable PVCCSP EIR mitigation measures MM Air 2, MM Air 4 through MM Air 7, MM Air 11 through MM Air 14, MM Air 18, and MM Air 20, as discussed in the Air Quality section of this Initial Study, would further reduce the GHG emissions associated with the proposed project.

b. Consistency with Adopted Plans. *Less Than Significant Impact.* SCAG is the metropolitan planning organization for Riverside County and Connect SoCal 2020 is the document that outlines the land use and transportation strategies necessary for the SCAG region to meet GHG emission reduction targets set by CARB in the Scoping Plan. As CARB has determined that Connect SoCal 2020 would achieve CARB's 2035 GHG emission reduction target of 19 percent below 2005 per capita emissions levels, consistency with Connect SoCal demonstrates consistency with the Scoping Plan.

Connect SoCal identifies areas within the SCAG region where the strategies of the plan are best realized; these are Priority Growth Areas. Priority Growth Areas include areas suitable for particular strategies and areas identified to already have crucial components for smart growth. These are Job Centers, Transit Priority Areas, High Quality Transit Areas, Neighborhood Mobility Areas, Livable Corridors, and Spheres of Influence. Per SCAG, the project site is within a Job Center and a High Quality Transit Area.[3] Priority Growth Areas account for just 4 percent of the SCAG region's total land area, but are intended to accommodate 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2016 and 2045. Implementation of Connect SoCal 2020, which is determined to achieve CARB's 2035 GHG emission reduction target of 19 percent below 2005 per capita emissions levels, consists of effecting the Priority Growth Area land use strategies.

Job Centers are Priority Growth Areas that have a significantly higher employment density than surrounding areas. These areas are intended for employment and residential growth as the length of vehicle trips are reduced when growth is concentrated. High Quality Transit Areas are corridor-focused Priority Growth Areas within one half mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours. Like Job Centers, High Quality Transit Areas benefit from, and are beneficial to, more employment and residential growth.

The project includes three buildings totaling 66,686 square feet of floor space, creating more business and employment opportunities within a SCAG Job Center. Employment growth within a designated Job Centers realizes the goals of Connect SoCal. In addition, the project aligns with the employment and population growth estimates of Connect SoCal 2020**.** Therefore, the project would not conflict with Connect SoCal 2020, nor by extension with the CARB Scoping Plan, and the potential impact would be less than significant.

Findings and Mitigation: All impacts would be less than significant without mitigation.

ISSUES:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
IX. HAZARDS AND HAZARDOUS MATERIALS - Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	

[3] SCAG Regional Data Platform, Content Library, HQTA (2045) and Job Centers feature layers accessed at: https://hub.scag.ca.gov/search?collection=Dataset&source=southern%20california%20association%20of%20governments%20(scag)&type=feature%20layer, June 15, 2023.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS - Would the project:				
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?			X	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to development within the Airport Influence Zones I and II. The Standards and Guidelines summarized below are incorporated as part of the proposed Project and are assumed in the analysis presented in this section. The chapters/section numbers provided correspond to the PVCCSP chapters/sections.

Airport Overlay Zone (from Chapter 12.0 of the PVCCSP)

12.1 Prohibited Uses in Airport Overlay Zones. This section identifies restrictions within the Clear Zone (CZ), Accident Potential Zone I (APZ-1), and Accident Potential Zone II (APZ-II) which are located within the PVCCSP area.

12.1.1 Compatibility with March Air Reserve Base

The PVCC is located in MARB Airport Influence Zones I and II; therefore, all development within the plan shall comply with the following measures:

- Avigation Easement
- Noise Standard
- Land Use and Activities
- Retention and Water Quality Basins
- Notice of Airport in the Vicinity
- Disclosure
- Lighting Plans

- Height Restrictions per Federal Aviation Regulations Part 77
- Clear Zone (Surface B)
- Approach/Departure Clearance Surface (Surface C)
- Inner Horizontal Surface (Surface E)
- Conical Surface
- Form 7460 (Notice of Proposed Construction or Alteration)

Section 2.1.6, Airport Overlay Zone Clear Zone prohibits new development of any kind.

Section 4.2.1, General On-site Project Development Standards and Guidelines, of the PVCCSP, also prohibits uses that could affect MARB, avigation easements, APZs, consistent with Section 12.

The PVCCSP EIR mitigation measures that are applicable to the proposed project are discussed in the following analysis.

a. Hazardous Materials Transport. *Less Than Significant Impact.* The projected uses would be non-industrial in nature, and more consistent with business park or office development. No use or transport of hazardous materials is anticipated. The proposed project would not create a significant hazard to the public or the environment through the routine transportation, use, or disposal of hazardous materials as no hazardous materials are associated with the proposed project. Therefore, the potential impact of the project would be less than significant. No mitigation is required. (Source: 8)

b. Risk of Upset. *Less Than Significant Impact.* The projected uses would be non-industrial in nature, and more consistent with business park or office development. No use or transport of hazardous materials is anticipated. The proposed project would not result in hazardous emissions or involve the handling of hazardous or acutely hazardous materials, substances, or waste. The proposed project has a less than significant potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment due to state and local requirements. Therefore, the potential impact of the project would be less than significant impact. (Sources: 15, 16)

c. Hazard Release Near Schools. The project site is not located within one-quarter mile of an existing or proposed school. The nearest school is Val Verde High School, about 1.7 miles southwest of the site. No impact would occur.

d. Hazards List. *No Impact.* The project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. A Phase I assessment by EEI was performed on the site in accordance with ASTM practice and standards, which concluded that there was no evidence of contamination, distressed vegetation, petroleum-hydrocarbon surface staining, waste drums/containers USTs, ASTs, illegal dumping, or improper waste storage/handling. In summary, there is no evidence of recognized environmental conditions in connection with the project site. Therefore, no further investigation or mitigated is required and no impact would occur (Sources: 1, 8)

e. Airport Safety Hazards. *Less Than Significant Impact.* The project site is located within Zone D, Flight Corridor Buffer, of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan which has no limits to residential and non-residential intensity and prohibits

uses that are hazards to flight. The project site is minimally impacted by current mission aircraft noise, flight paths, or any zones related to localized aircraft incident statistics. The project was referred to the Riverside County Airport Land Use Commission (ALUC) in January 2023. In their response dated March 9, 2023, ALUC determined that the project was consistent with the March Air Reserve Base/Inland Port Airport Compatibility Plan subject to the following conditions:

1. Any new outdoor lighting that is installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.

2. The following uses/activities are not included in the proposed project and shall be prohibited at this site:

(a) Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight or circling climb following takeoff or toward an aircraft engaged in a straight or circling final approach toward a landing at an airport, other than a DoD or 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 or circling climb following takeoff or towards an aircraft engaged in a straight or circling final approach towards a landing at an airport.
(c) Any use which would generate smoke or water vapor, or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include landscaping utilizing water features, aquaculture, production of cereal grains, sunflower, and row crops, composting operations, wastewater management facilities, artificial marshes, trash transfer stations that are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators.)
(d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.
(e) Hazards to flight

3. The attached notice shall be provided to all prospective purchasers of the property and tenants of the building, and shall be recorded as a deed notice. The notice states the following:

"NOTICE OF AIRPORT IN VICINITY. 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 & Professions Code Section 11010 (b) (13)(A).

4. Any proposed detention basins or facilities shall be designed and maintained to provide for a maximum 48-hour detention period following the design storm, and remain totally dry between rainfalls. Vegetation in and around the detention basins that would provide food or cover for birds would be incompatible with airport operations and shall not be utilized in project landscaping. Trees shall be spaced so as to prevent large expanses of contiguous canopy, when mature. Landscaping in and around the detention basin(s) shall not include trees or shrubs that produce seeds, fruits, or berries.

Landscaping in the detention basin, if not rip-rap, should be in accordance with the guidance provided in ALUC "LANDSCAPING NEAR AIRPORTS" brochure, and the "AIRPORTS, WILDLIFE AND STORMWATER MANAGEMENT" brochure available at RCALUC.ORG which list acceptable plants from Riverside County Landscaping Guide or other alternative landscaping as may be recommended by a qualified wildlife hazard biologist.

A notice sign, in a form similar to that attached hereto, shall be permanently affixed to the stormwater basin with the following language: "There is an airport nearby. This stormwater basin is designed to hold stormwater for only 48 hours and not attract birds. Proper maintenance is necessary to avoid bird strikes". The sign will also include the name, telephone number or other contact information of the person or entity responsible to monitor the stormwater basin.

5. March Air Reserve Base must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result. Sources of electromagnetic radiation include radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc.

6. The project has been evaluated to construct three business professional office buildings totaling 66,686 square feet. Any increase in building area, change in use to any higher intensity use, change in building location, or modification of the tentative parcel map lot lines and areas will require an amended review to evaluate consistency with the ALUCP compatibility criteria, at the discretion of the ALUC Director.

The project-specific conditions authored by ALUC replace PVCCSP EIR mitigation measures MM Haz 2 though MM Haz 6 for the proposed project. Compliance with these ALUC conditions would ensure that the project would not pose a significant safety threat to persons living or working in the vicinity, and a less than significant impact would occur. (Sources: 4, 19)

f. Interference with Emergency Response or Evacuation. *Less Than Significant Impact.* The City of Perris participates in the County of Riverside Multi-Jurisdictional Local Hazard Mitigation Plan which outlines requirements for emergency access and standards for emergency responses. The PVCC EIR Initial Study determined that because emergency access will be maintained and improved throughout the PVCC area in accordance with the Local Hazard Mitigation Plan, development within the PVCC area will not interfere with adopted emergency response plans.

Implementation of the proposed project would generate an increase in the amount and volume of traffic on local and regional networks. The project proponent would be required to design,

construct, and maintain structures, roadways, and facilities to comply with applicable local, regional, State and/or Federal requirements related to emergency access and evacuation plans. Construction activities, which may temporarily restrict vehicular traffic, would be required to implement measures to facilitate the passage of persons and vehicles through/around any required road closures. Adherence to these requirements would reduce potential impacts related to this issue to a less than significant level. No mitigation is required. (Source: 1)

g. Wildland Fire Hazard. *No Impact.* The proposed project site is not located within a Fire Hazard Area or within an area susceptible to wildfires. Development of the proposed project would not expose persons or property to increased wildland fire risks. Therefore, no impact associated with this issue would occur and no mitigation is required. (Source: 1)

Findings and Mitigation: All impacts would be less than significant based on the project's compliance with existing regulations related to addressing site hazards and the implementation of the prescribed conditions set forth by ALUC as they relate to airport safety. No mitigation measures are required.

ISSUES:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
X. HYDROLOGY AND WATER QUALITY - Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			X	
i. result in substantial erosion or siltation on- or off-site?			X	
ii. substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?			X	
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			X	
iv. impede or redirect flood flows?			X	
d) In flood hazard, tsunami or seiche zones, rick release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to water quality and hydrology. These Standards and Guidelines are summarized below, are incorporated as part of the proposed Project,

and are assumed in the analysis presented in this section. No mitigation measures for hydrology and water quality are included in the PVCCSP EIR.

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

4.2 On-Site Standards and Guidelines

4.2.2 Site Layout for Commerce Zones

4.2.2.7 Water Quality Site Design

General Standards. Refer to NPDES Permit Board Order R8-2010-0033 for complete and current information on water quality management standards.

Water Quality Management Plan. Most developments are required to implement a Water Quality Management Plan (WQMP) in accordance with the most recently adopted Riverside County MS4 NPDES Permit. The MS4 Permit requires that applicable new development and redevelopment projects implement the following:

- Design the site to minimize imperviousness, detain runoff, and infiltrate, reuse or evapotranspirate runoff where feasible.
- Cover or control sources of stormwater pollutants.
- Use LID to infiltrate, evapotranspirate, harvest and use, or treat runoff from impervious surfaces.
- Ensure runoff does not create a hydrologic condition of concern.
- Maintain Stormwater BMPs.

Low Impact Design. According to the State Water Resources Control Board, Low Impact Design (LID) is "a sustainable practice that benefits water supply and contributes to water quality protection. The goal of LID is to mimic a site's predevelopment hydrology. The seven mandatory BMP types to be implemented on project sites:

- Infiltration Basins
- Infiltration Trenches
- Permeable Pavement
- Harvest and Reuse
- Bioretention Facilities
- Extended Detention Basins
- Sand Filter Basins

The NPDES permit requires that the design capture volume be first infiltrated, evapotranspirated, or harvested and reused. When sure retention methods are infeasible, the remainder of the volume can be biotreated. The steps to this approach include:

- Optimize the Site Layout
- Preserve existing drainage patterns
- Protection of existing vegetation and sensitive areas
- Preserve natural infiltration capacity

- Minimize impervious area
- Disperse runoff to adjacent pervious areas
- Delineate drainage management areas
- Classify and Tabulate DMAs and determine runoff factors for
    - Self-treating areas
    - Self-retaining areas
    - Areas draining to self-retaining areas
    - Areas draining to BMPs

Source Control. Source control features are also required to be implemented for each project as part of the Final WQMP. Source control features include permanent (structural) or operational and are those measures which can be taken to eliminate the presence of pollutants through prevention. Steps to selecting Source Control BMPs include:

- Specify source control BMPs
- Identify pollutant sources
- Note locations on project specific WQMP exhibit
- Prepare a table and narrative
- Identify operational source control BMPs

BMP Features in "Visibility Zone". Treatment control BMPs adjacent to the public right-of-way must drain properly to adequate storm drain facilities. If no storm drain is available, alternative drainage shall be proposed for approval by City Engineer. Treatment control BMPs are not to be placed within public right-of-way.

Open Jointed Surfaces for Sidewalks. Interlocking pavers, porous pavement and pervious concrete or other surfaces.

Open Jointed Surfaces in Low Traffic Areas. Open jointed surfaces or porous concrete in low-traffic areas of parking lots and for patios and sidewalks.

Filter Strips. Vegetated areas consisting of grass turf or other low lying, thick vegetation intended to treat sheet flow from adjacent impervious areas shall be considered for use adjacent to parking lots, sidewalks, and roads.

Filter Strip Adjoining Impervious Surfaces. Filter strips should adjoin impervious surfaces where feasible.

Roof Runoff Discharge into Landscape Area. Discharge to landscaped areas adjacent to the buildings.

Second Treatment of Roof Water. If roof runoff cannot be conveyed without mixing with on-site untreated runoff, the roof runoff will require a second treatment.

Covered Trash Enclosures. Trash enclosures covers must be provided.

a. Water Quality Standards. *Less Than Significant Impact.* The project would comply with all water quality standards and waste discharge requirements addressing stormwater runoff and nuisance drainage onsite, and post-construction erosion and discharge impacts. The City of Perris

Municipal Code requires the project proponent to prepare a project-specific Water Quality Management Plan (WQMP) in compliance with Regional Water Quality Control Board Order No. R8-2010-0033. The WQMP identifies measures to treat and/or limit the entry of contaminants into the storm drain system and travel to the identified receiving waters.

Prior to City approval of the originally proposed retail development, a Preliminary Water Quality Management Plan (PWQMP) was required. Alliance Land Planning and Engineering Inc. prepared a Preliminary Water Quality Management Plan for the project, which was reviewed by the City's Water Quality Consultant, Cynthia Gabaldon, of CG Resource Management and Engineering. On March 14, 2017, Ms. Gabaldon determined the submitted PWQMP to be in substantial compliance with the requirements of the Riverside County WQMP Manual. The PWQMP was updated in January 2023 to address the currently proposed project. As the project would follow the requirements of the updated WQMP, potential impacts would be less than significant.

The project proponent would also be required to obtain a National Pollutant Discharge Elimination System (NPDES) General Construction permit, which includes a Stormwater Prevention Pollution Plan (SWPPP) to address erosion and discharge impacts associated with the proposed on-site grading. Best Management Practices (BMPs) will be identified in the SWPPP and implemented to reduce impacts to surface water from construction or stormwater discharges. BMPs utilized during the construction phase may include the use of gravel bags, silt fences, hay bales, check dams, hydroseed, and soil binders. The WQMP is required to be incorporated by reference or attached to the project's SWPPP as the Post-Construction Management Plan. Potential impacts would be less than significant. (Sources: 1, 3, 7)

b. Groundwater Supplies. *No Impact.* The proposed project does not require the withdrawal of groundwater, therefore the proposed project would not result in the direct lowering of the local groundwater table. The water table is approximately 49 feet below the ground surface, according to the geotechnical report. The proposed project would not interfere with groundwater recharge as the project site is not identified as a groundwater recharge area by the City. Through the addition of sidewalks, parking lots, and other hardscape surfaces (paved areas and building areas), development of the proposed project would reduce the amount of pervious surfaces that could facilitate percolation on site. Because project design features would be sized to accommodate storm runoff and nuisance drainage on site, and since the site is not identified as a groundwater recharge area, implementation of the proposed project would not deplete groundwater supplies or interfere substantially with groundwater recharge to create a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, the potential impacts associated with this issue would be less than significant and no mitigation is required. (Sources: 7, 9, 10, 15)

c. Drainage Patterns and Erosion. *Less Than Significant Impact.* The existing drainage patterns of the site run predominantly to the south, and the average surface slope is less than 0.5%. No streams or rivers cross the project site. Currently untreated surface flows run from the site across the public sidewalk and into the gutter along Harley Knox Boulevard. Once in the gutter, runoff runs east until it hits Perris Boulevard and continues to run south. Harley Knox Boulevard is not currently equipped with a storm drain system of inlets to accept runoff from the project site. Perris Boulevard does have an 18-inch storm drain (Line B) running south with an existing catch basin on the west side of Perris Boulevard adjacent to the site. However, this drain is not feasible for project use due to its small size and relatively high elevation to the site.

The project site is located directly south of Lateral B of the Perris Valley Storm Drain Channel which is an earthen trapezoidal flood control channel. Since the site naturally drains south and away from the flood control channel, the developed condition of the site would alter current runoff patterns to allow drainage into the Lateral B of the Perris Valley Storm Drain Channel. Harley-Knox Boulevard would no longer receive surface flows.

This information is reflected in the approved PWQMP for the approved project. Preparation of a WQMP is a standard requirement for all development activity. The primary objective of the WQMP, by addressing site design, source control, and treatment control BMPs for a project, is to ensure that the land use approval and permitting process of the City minimizes the cumulative regional impact of urban runoff. Although the existing drainage pattern of the site would be altered, no substantial erosion or siltation on- site or off-site will occur, and the project, as designed, would not substantially increase the rate or amount of surface runoff to the degree it would result in flooding on-site or off-site. Through adherence to the WQMP and City requirements, potential impacts associated with this issue would be less than significant and no mitigation is required.

Development of the project site would result in an increase in the amount of impervious surfaces in the form of buildings, parking lots, roadways and sidewalks. Conditions resulting from this change could degrade existing water quality due to increased runoff volumes and velocity; reduced infiltration; increased flow frequency, duration, and peak; and faster time to reach peak flow. However, implementation of the WQMP for the proposed project would include installation of BMPs designed to remove pollutants from runoff coming from the project site. In addition, the proposed project would include the construction of a storm drain system with a series of surface infiltration trenches with pretreatment of storm water and nuisance drainage that would allow storm water to leave the site at pre-development flow levels and connect into the Perris Valley Storm Drain Channel, an existing storm drain facility to the north. With the proposed on-surface bioretention/biotreatment infiltration trenches as part of the private underground storm drain system and implementation of the project WQMP, there are substantial safeguards to protect water quality, and the potential impact would be less than significant impact. (Sources: 7, 9, 10, 15)

d. Flood, Tsunami and Seiche Hazards. *No Impact.* The proposed project site is not located within an area identified as a 100-year floodplain. Because the proposed project is not located within an area identified as being subjected to flood hazards by the Federal Emergency Management Agency, placement of structures within a flood hazard area would not occur, and would not impede or redirect flood flows. Therefore, no impact related to this issue would occur and no mitigation is required.

Portions of the City are susceptible to inundation resulting from dam failure. The City is located within the potential dam inundation plains of three reservoirs: Pigeon Pass Reservoir to the north in the City of Moreno Valley, Lake Perris Reservoir to the southeast, and Little Lake Reservoir to the east in Hemet. Failure of these dams would cause major flooding in those areas identified within Exhibit S-15 of the City's General Plan Safety Element. Based on this exhibit, the project site is not within the potential dam inundation plains of Pigeon Pass Reservoir, Lake Perris Reservoir, or Little Lake Reservoir. Since the project site is not susceptible to inundation resulting from dam failure, no impact associated with this issue would occur. No mitigation is required.

Sites susceptible to tsunami and seiche events would need to be close to a large body of water and in seismically active areas. The closest water body is Lake Perris, approximately 1.5 miles to the east. The Pacific Ocean is approximately 40 miles south of the project site, and due to this distance,

the project site would not be susceptible to a tsunami event there. Similarly, the project site would not be susceptible to a tsunami or seiche event associated with the failure of the Lake Perris Reservoir as the project site is outside of the inundation zone identified for the Lake Perris Reservoir. The project site would not be susceptible to a mudflow event as the project site is located in a relatively flat area that does not contain any canyons, arroyos, or gulches. Since the project site's distance and topographic features would not expose people or structures to inundation by seiche, tsunami, or mudflow, no impact associated with this issue would occur and no mitigation is required. (Sources: 1, 8, 9)

e. RWQCB Standards. *Less Than Significant Impact.* The proposed project would discharge wastewater into to the public sewer system via a private on-site sewer lift station for ultimate treatment at the City's wastewater treatment plant. The Public Works Department would verify that all discharge requirements established by the Regional Water Quality Control Board are satisfied. The project is required to, and does incorporate stormwater controls which provides water quality treatment of generated site run-off. Therefore, the potential impact would be less than significant.

Findings and Mitigation: Since no significant impacts were identified, no mitigation is required.

ISSUES:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
XI. LAND USE AND PLANNING - Would the project:				
a) Physically divide an established community?				X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?		X		

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

PVCCSP Standards and Guidelines applicable to individual environmental topics (e.g., air quality, cultural, and paleontological resources) have been identified in each individual section of the PVCCSP EIR. The PVCCSP and PVCCSP EIR do not include Standards and Guidelines or mitigation measures specifically related to land use and planning.

a. Physical Division of Established Communities. *No Impact.* The proposed project site is an urban infill site, on the edge of existing development in a commercial and industrial portion of the City. As such, it does not divide an established community.

The division of an established community typically refers to the construction of a physical feature (such as a highway or railroad tracks) or removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community, or between a community and outlying areas. The site is located within the PVCC area, and would include uses that are consistent with the type and scale of physical development envisioned under the PVCCSP. No impact would occur and no mitigation is required.

b. Plan and Policy Consistency. *Less Than Significant Impact.* The project includes an amendment to the PVCCSP in order to include a Planned Development Overlay (PDO) on the 4.37-acre project site to facilitate the proposed development. The PDO would allow flexibility in architectural design, and to allow business professional office development within the underlying Commercial (C) zone. With this amendment to the specific plan, the project would be consistent with that document.

Table 7 (General Plan Consistency Analysis), evaluates the consistency of the proposed project with the applicable policies of the Comprehensive General Plan 2030 that have been adopted for the purpose of avoiding or mitigating an environmental impact. Table 7 demonstrates the proposed project would be consistent with the City's General Plan policies that are applicable to the project with implementation of the mitigation measures recommended in this Initial Study.

Table 7. General Plan Consistency Analysis

Applicable Element/Policy	**Policy Consistency Analysis**
Land Use Element	
Policy II.A: Require new development to pay its full, fair-share of infrastructure costs.	**Consistent.** The project applicant would install or make fair-share contributions toward necessary infrastructure, pay established development impact fees (DIF), and pay regional impact fees (Traffic Uniform Mitigation Fee or TUMF for traffic which are all standard conditions of approval in the City.
Policy II.B: Require new development to include school facilities or pay school impact fees, where appropriate.	**Consistent.** The project applicant would pay applicable school impact fees to the serving school districts.
Policy III.A: Accommodate diversity in the local economy.	**Consistent.** The project would provide new short-term jobs during construction and new long-term employment for those employed in the proposed development. Long-term jobs may be part-time or full-time depending on duties and need and would provide employment for various income levels.
Policy V.A: Restrict development in areas at risk of damage due to disasters.	**Consistent.** The analysis in this Initial Study concludes that the project site is not located within an area subject to significant hazards or hazardous conditions (e.g., flooding, wildfires, earthquakes).
Circulation Element	
Policy I.B: Support development of a variety of transportation options for major employment and activity centers including direct access to commuter facilities, primary arterial highways, bikeways, park-and-ride facilities, and pedestrian facilities.	**Consistent.** Although this project would not be a major employment or activity center, the adjacent roadways have sidewalks, the project would provide bicycle racks, and bus service is available on Perris Boulevard near the site. The Project applicant would also pay applicable development impact fees (DIF), which may be used by the City to support development of transportation options.

Table 7. General Plan Consistency Analysis	
Applicable Element/Policy	**Policy Consistency Analysis**
Policy II.B: Maintain the existing transportation network while providing for future expansion and improvement based on travel demand, and the development of alternative travel modes.	**Consistent.** The project does not include or require any changes to the existing transportation network.
Policy III.A: Implement a transportation system that accommodates and is integrated with new and existing development and is consistent with financing capabilities. **(Impl. Measure III.A.4)** Require developers to be primarily responsible for the improvement of streets and highways to developing commercial, industrial, and residential areas. These may include road construction or widening, installation of turning lanes and traffic signals, and the improvement of any drainage facility or other auxiliary facility necessary for the safe and efficient movement of traffic or the protection of road facilities.	**Consistent.** The project does not include or require any changes to the existing transportation system. The project applicant would pay established development impact fees (DIF) and pay regional impact fees (Traffic Uniform Mitigation Fee or TUMF for traffic improvements within the City.
Policy V.A: Provide for safe movement of goods along the street and highway system.	**Consistent.** Employees and customers would be travelers along Perris Boulevard and Harley Knox Boulevard to and from the I-215 Freeway.
Conservation Element	
Policy II.A: Comply with state and federal regulations to ensure protection and preservation of significant biological resources. (Impl. Measure II.A.2) For public and private projects located in areas with potential for moderate or high plant and wildlife sensitivity, require biological surveys as part of the development review process.	**Consistent.** A Biological Resource Survey was conducted for the project site. Section 4, Biological Resources, demonstrates the project would not have any significant impacts on biological resources with implementation of project-specific mitigation measure MM BR-1.
Policy III.A: Review all public and private development and construction projects and any other land use plans or activities within the MSHCP area, in accordance with the conservation criteria procedures and mitigation requirements set forth in the MSHCP.	**Consistent.** A Biological Resource Survey was conducted for the project site. Section IV., Biological Resources. A pre-construction survey for the burrowing owl and follow up as needed, as described in project-specific mitigation measure MM BR-1, would ensure consistency with the MSHCP.
Policy IV.A: Comply with state and federal regulations and ensure preservation of the significant historical, archaeological and paleontological resources.	**Consistent.** Section V., Cultural Resources, and Section XVIII., Tribal Cultural Resources demonstrate the project would not have significant impacts on archaeological or historical resources with implementation of project-specific mitigation measures MM CR-1 and MM CR-2. In addition, Section VII., Geology and Soils, in this Initial Study concluded the project would not have significant impacts on paleontological resources with the implementation of project-specific mitigation measure MM GS-1.

Table 7. General Plan Consistency Analysis	
Applicable Element/Policy	**Policy Consistency Analysis**
Policy V.A: Coordinate land-planning efforts with local water purveyors.	**Consistent.** Section XIX., Utilities and Service Systems, demonstrates the project has and is being coordinated with the Eastern Municipal Water District (EMWD).
Policy VI.A: Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).	**Consistent.** Section X., Hydrology and Water Quality, states that the project proponent would also be required to obtain an NPDES General Construction permit, which includes an SWPPP to address erosion and discharge impacts associated with the proposed on-site grading.
Policy VII.A: Preserve significant hillsides and rock outcroppings in the planning areas.	**Consistent.** The project site is void of any hillsides or rock outcroppings.
Noise Element	
Policy I.A: The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development. **(Impl. Measure I.A.1)** All new development proposals will be evaluated with respect to the State Noise/Land Use Compatibility Criteria. Placement of noise sensitive uses will be discouraged within any area exposed to exterior noise levels that fall into the "Normally Unacceptable" range and prohibited within areas exposed to "Clearly Unacceptable" noise ranges.	**Consistent.** Noise levels of up to 65 dBA CNEL are normally acceptable for office buildings, business, commercial, professional, and mixed-use development without any special noise insulation requirements. The primary source of noise at the project site is traffic on Perris Boulevard and Harley Knox Boulevard. Appendix G of the Noise Element shows that the future 65 dBA CNEL noise contour for Harley Knox Boulevard (previously Oleander Avenue) is expected to occur at a distance of 81 feet from the roadway centerline while the 65 dBA CNEL noise contour for Perris Boulevard is expected to occur at a distance of 262 feet from the roadway centerline. The proposed buildings would be located beyond these distances. The project site is located approximately 1 mile east and slightly south of MARB/IPA and is located outside the 60 dBA CNEL noise contour area for this airport.
Policy V.A: New large scale commercial or industrial facilities located within 160 feet of sensitive land uses shall mitigate noise impacts to attain an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria.	**Consistent.** The project site is not located within 160 feet of any existing or proposed land use that is sensitive to noise.
Safety Element	
Policy S-2.1: Require road upgrades as part of new developments/major remodels to ensure adequate evacuation and emergency vehicle access. Limit improvements for existing building sites to property frontages.	**Consistent.** The project would have direct access to Harley Knox Boulevard and could access Perris Boulevard through the existing development. These roadways provide adequate evacuation and emergency vehicle access to the project area and this portion of the City. The project would make site adjacent improvements as needed to Harley Knox Boulevard as part of project construction.

Table 7. General Plan Consistency Analysis	
Applicable Element/Policy	**Policy Consistency Analysis**
Policy S-2.2: Require new development or major remodels include backbone infrastructure master plans substantially consistent with the provisions of "Infrastructure Concept Plans" in the Land Use Element.	**Consistent.** The project would provide improvements as appropriate that are outlined in the PVCCSP, as described in Section XIX., Utilities, in this Initial Study.
Policy S-2.5: Require all new developments, redevelopments, and major remodels to provide adequate ingress/egress, including at least two points of access for sites, neighborhoods, and/or subdivisions.	**Consistent.** The project would have direct access to two major roads in this portion of the City; Harley Knox Boulevard and Perris Boulevard. These roadways provide adequate evacuation and emergency vehicle access to the project area.
Policy S-4.1: Restrict future development in areas of high flood hazard potential until it can be shown that risk is or can be mitigated.	**Consistent.** Section X., Hydrology and Water Quality, demonstrates that the project would not be subject to flooding (i.e., located in FEMA Flood Zone D) so it would not have a high risk of flooding.
Policy S-4.3: Require new development projects and major remodels to control stormwater run-off on site.	**Consistent.** Section X., Hydrology and Water Quality, demonstrates that the proposed drainage system would accommodate onsite runoff so that there would be no increase in downstream offsite runoff.
Policy S-4.4: Require flood mitigation plans for all proposed projects in the 100-year floodplain (Flood Zone A and Flood Zone AE).	**Consistent.** Section X., Hydrology and Water Quality, demonstrates that the project would not be subject to flooding (i.e., located in FEMA Flood Zone D) so it would not have a high risk in this regard.
Policy S-4.5: Ensure areas downstream of dams within the City are aware of the hazard potential and educated on the necessary steps to prepare and respond to these risks.	**Consistent.** Safety Element Figure S-4 indicates that the project site is not within the inundation zone of the Perris Dam.
Policy S-5.3: Promote new development and redevelopment in areas of the City outside the VHFHSZ and allow for the transfer of development rights into lower-risk areas, if feasible.	**Consistent.** Safety Element Figure S-5 indicates that the project site is in a Local Responsibility Area and not within a VHFHSZ.
Policy S-5.6: All developments throughout the City Zones are required to provide adequate circulation capacity, including connections to at least two roadways for evacuation.	**Consistent.** The project would have direct access to Harley Knox Boulevard and can access Perris Boulevard through the existing development. These roadways provide adequate evacuation and emergency vehicle access to the project area and this portion of the City.
Policy S-5.10: Ensure that existing and new developments have adequate water supplies and conveyance capacity to meet daily demands and firefighting requirements.	**Consistent.** Section XIX., Utilities, indicates that the project would have sufficient water supplies and adequate infrastructure for water conveyance consistent with the PVCCSP infrastructure plan.

Table 7. General Plan Consistency Analysis	
Applicable Element/Policy	**Policy Consistency Analysis**
Policy S-6.1: Ensure new development and redevelopments comply with the development requirements of the AICUZ Land Use Compatibility Guidelines and ALUP Airport Influence Area for March Air Reserve Base.	**Consistent.** The proposed project would be consistent in terms of land use with the MARB/IPA ALUCP and AICUZ limitations placed on the site due to the presence of MARB/IPA to the north and northwest (see Section IX., Hazards and Hazardous Materials). The project would be consistent with the building limitations identified by ALUC for Safety Zone D within which the project site is located, per the conditions set forth in the letter from ALUC dated March 9, 2023.
Policy S-6.2: Effectively coordinate with March Air Reserve Base, Perris Valley Airport, and the March Inland Port Airport Authority on development within its influence areas.	**Consistent.** The project was submitted to ALUC for review and was found to be consistent with the MARB/IPA ALUCP in May 2023 by implementing the conditions set forth in the letter from ALUC dated March 9, 2023.
Policy S-6.3: Effectively coordinate with March Air Reserve Base and Perris Valley Airport on development within its influence areas	**Consistent.** The project was submitted to ALUC for review and was found to be consistent with the MARB/IPA ALUCP in May 2023 by implementing the conditions set forth in the letter from ALUC dated March 9, 2023.
Policy S-7.1: Require all development to provide adequate protection from damage associated with seismic incidents.	**Consistent.** Section VII., Geology and Soils, indicates that the project geotechnical study concluded the project would have less than significant impacts related to faulting and seismic shaking.
Policy S-7.2: Require geological and geotechnical investigations by State-licensed professionals in areas with potential for seismic and geologic hazards as part of the environmental and development review and approval process.	**Consistent.** The geotechnical study concluded that the project would have less than significant impacts related to seismic and geologic hazards.
Healthy Community Element	
Policy HC 1.3: Improve safety and the perception of safety by requiring adequate lighting, street visibility, and defensible space.	**Consistent.** The project would comply with the City's requirements regarding adequate lighting, street visibility, and defensible space through compliance with the City's development review process.
Policy HC 2.3: Promote increased physical activity, reduced driving and increased walking, cycling and public transit by: • Requiring where appropriate the development of compact development patterns that are pedestrian and bicycle friendly • Increasing opportunities for active transportation (walking and biking) and transit use • Encouraging the development of neighborhood grocery stores that provide fresh produce	**Consistent.** The project would have access to public transit proximate to the site along Perris Boulevard. Harley Knox Boulevard and Perris Boulevard have sidewalks, and the project would provide bicycle racks.

Table 7. General Plan Consistency Analysis	
Applicable Element/Policy	**Policy Consistency Analysis**
Policy HC 2.4: Promote development patterns and policies that: • Reduce commute times • Encourage the improvement of vacant properties and the reinvestment in neighborhoods • Provide public space for people to congregate and interact socially • Foster safe and attractive environments • Encourage civic participation	**Consistent.** The project would develop a vacant site, create new jobs for local residents, and have good local and regional access for commuters.
Policy HC 2.6: Encourage land use and urban design to promote physical activity, provide access to nutritious foods, and reduce air pollution	**Consistent.** The project would be adjacent to sidewalks and provide bicycle racks. The project would also not exceed South Coast AQMD thresholds related to local or regional air pollutants.
Policy HC 3.1: Coordinate with transportation service providers and transportation planning entities to improve access to multi-modal transportation options throughout Perris including public transit	**Consistent.** The project site is proximate to existing transit services and the project applicant is coordinating with RTA as needed regarding transit access.
Policy HC 3.5: Promote job growth within Perris to reduce the substantial out-of-Perris job commutes that exist today	**Consistent.** The project would provide new jobs, which would help reduce out-of-Perris commute times for local workers.
Policy HC 4.1: Promote public spaces that foster positive human interaction and healthy lifestyles	**Not Applicable.** The project is commercial business park in nature and would not provide public spaces or congregate areas.
Policy HC 6.1: Support regional efforts to improve air quality through energy efficient technology, use of alternative fuels, and land use and transportation planning	**Consistent.** The project would not exceed South Coast AQMD thresholds for local or regional air pollutant emissions and would comply with the latest energy conservation requirements of the CalGreen Code.
Policy HC 6.2: Support regional water quality efforts that balance water conservation, use of recycled water, and best practices in watershed management	**Consistent.** As described in Section IX., Hydrology and Water Quality, the project would protect water quality, both onsite and downstream, by implementing appropriate BMPs.

Table 7. General Plan Consistency Analysis	
Applicable Element/Policy	**Policy Consistency Analysis**
Policy HC 6.3: Promote measures that will be effective in reducing emissions during construction activities. • Perris will ensure that construction activities follow existing South Coast Air Quality Management District (SCAQMD) rules and regulations. • All construction equipment for public and private projects will also comply with California Air Resources Board's vehicle standards. For projects that may exceed daily construction emissions established by the SCAQMD, Best Available Control Measures will be incorporated to reduce construction emissions to below daily emission standards established by the SCAQMD • Project proponents will be required to prepare and implement a Construction Management Plan which will include Best Available Control Measures, among others. Appropriate control measures will be determined on a project by project basis, and should be specific to the pollutant for which the daily threshold is exceeded.	**Consistent.** As discussed in Section III., Air Quality, the project would comply with the existing South Coast AQMD rules and regulations aimed at reducing emissions of pollutants. The project would not exceed any South Coast AQMD daily regional or localized emissions thresholds. The project would also implement all applicable PVCCSP EIR mitigation measures for air quality.
Environmental Justice Element	
Goal 3.1 Policy: Continue to ensure new development is compatible with the surrounding uses by co-locating compatible uses and using physical barriers, geographic features, roadways or other infrastructure to separate less compatible uses. When this is not possible, impacts may be mitigated using: noise barriers, building insulation, sound buffers, traffic diversion.	**Consistent.** The project site is adjacent to light industrial and commercial uses so the project would be consistent with existing and proposed land uses in the area.
Goal 3.1 Policy: As part of the development review process, require conditions that promote Good Neighbor Policies for Industrial Development for industrial buildings larger than 100,000 square feet. The conditions shall be aimed at protecting nearby homes, churches, parks, day-care centers, schools, and nursing homes from air pollution, noise lighting, and traffic associated with large warehouses, making them a "good neighbor."	**Consistent.** Project development would be less than 100,000 square feet and there are no sensitive receptors within 1,000 feet of the project site.

March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan

The project site is located within Zone D, Flight Corridor Buffer, of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan which has no limits to residential and non-residential intensity and prohibits uses that are hazards to flight. The project site is minimally impacted by current mission aircraft noise, flight paths, or any zones related to localized aircraft incident statistics. The project was referred to the Riverside County Airport Land Use Commission

(ALUC) in January 2023. In their response dated March 9, 2023, ALUC determined that the project was consistent with the March Air Reserve Base/Inland Port Airport Compatibility Plan subject to conditions described in Section IX. of this Initial Study.

Summary

The preceding analysis demonstrates the project would not conflict with local or regional plans and policies that have been adopted for the purpose of avoiding or mitigating an environmental impact. Potential impacts would be less than significant with the implementation of the mitigation measures referred to in Table 7 and elsewhere in this Initial Study. The potential impacts would be less than significant with mitigation incorporated. (Source: 1)

Findings and Mitigation: The potential impacts would be less than significant with the implementation of the mitigation measures referred to in Table 7 and elsewhere in this Initial Study.

ISSUES:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
XII. MINERAL RESOURCES - Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

There are no Standards and Guidelines or mitigation measures related to mineral resources included in the PVCCSP or associated PVCCSP EIR.

a. and b. Mineral Resources: *No Impact.* Based on the Mineral Resource Zones (MRZ) established by California Department of Conservation, the project site is not located within an MRZ area. The California Department of Conservation is primarily interested in preservation of access to significant mineral resources in MRZ areas. Lands within the City of Perris and its Sphere of Influence are designated MRZ3 and MRZ4, which are not defined as significant resource areas. Because the site is not designated as an area with known mineral resource value, development of the proposed retail center would not impact the availability of valuable mineral resources. No impacts would occur. (Sources: 1, 3)

Findings and Mitigation: No impacts would occur, therefore, no mitigation is required.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XIII. NOISE - Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to the analysis of noise impacts. These are presented below, are incorporated as part of the proposed project and are assumed in the analysis presented in this section.

Airport Overlay Zone (from Chapter 12.0 of the PVCCSP)

- All building office areas shall be constructed with appropriate sound mitigation measures as determined by an acoustical engineer or architect to insure appropriate sound levels.

The PVCCSP EIR mitigation measures that are applicable to the proposed Project are incorporated into the following analysis.

a. Short-Term (Construction) and Long-Term (Traffic) Noise. *Less Than Significant Impact.* The project would generate short-term increases in existing noise levels associated with construction activities. Temporary construction activity would increase ambient noise above levels existing without the project.

The nearest single-family detached residential dwelling units are located east (approximately 1,600 feet) to the project site and may be affected by short-term noise impacts associated the transport of workers, the movement of construction materials to and from the project site, ground clearing, excavation, grading, and building activities. In addition, the nearest commercial land use (225 feet to the east) located east of the project site has the potential to be temporarily affected by construction noise. Construction noise is considered a short-term impact and would be considered significant if construction activities are undertaken outside the allowable times as described by the City's Municipal ordinances 7.34.060 or exceed a maximum noise levels of 80 dBA. The noise analysis reviews the construction noise levels during the various phases of the project.

Project generated construction noise will vary depending on the construction process, type of equipment involved, location of the construction site with respect to sensitive receptors, the schedule proposed to carry out each task (e.g., hours and days of the week) and the duration of the construction work. Site preparation is expected to produce the highest sustained construction noise

levels. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Noise levels will be loudest during grading phase. A likely worst-case construction noise scenario during grading assumes the use of a grader, a dozer, and two (2) excavators, two (2) backhoes and a scrapper operating at 150 feet from the nearest sensitive receptor.

Assuming a usage factor of 40 percent for each piece of equipment, unmitigated noise levels at 150 feet have the potential to reach 78 dBA Leq and 80 dBA Lmax during grading. Noise levels for the other construction phases would be lower and range between 73 to 75 dBA. The nearest residences located to the project site are approximately 1,600 feet east of the project site. Existing commercial is located approximately 225 feet east. Both of these land uses would experience noise levels lower than what is projected at 150 feet.

Although the impact of the project would be less than significant, the project would be required to implement PVCCSP EIR mitigation measures MM Noise 1 through MM Noise 4. Implementation of these mitigation measures would further reduce potential impacts of temporary construction noise levels. (Sources: 1, 2, and 13)

The proposed project would have no outdoor work areas. No substantial noise generating activities are proposed. All activities within the City of Perris shall conform to the noise standards in the Noise Element of the General Plan as well as the noise regulations contained in the Municipal Code. Any violations would be addressed through the City's existing Code Compliance procedures. Any potential impact would be less than significant.

The project would also generate traffic, which would incrementally increase noise levels on nearby area roadways. It is estimated that the project would generate up to 284 daily trips, with 27 trips during both the AM and PM peak hours. The major roadway sources of noise in the project vicinity are Perris Boulevard and Harley Knox Boulevard. According to the City of Perris General Plan 2022 Circulation Element, Perris Boulevard carries 17,464 daily trips north of Nance Street, in the general vicinity of the project area. This results in an existing noise level of 74.6 dbA CNEL within 50 feet of the roadway centerline. According to the Noise Element, noise impacts to sensitive uses (such as residences) would occur when the exterior of such uses is exposed to noise levels exceeding 60 dBA CNEL. This level of noise is currently experienced within 1,449 feet of Perris Boulevard. The nearest residences within that distance to Perris Boulevard are about a mile to the north of the project site. The General Plan already anticipates future traffic volumes along Perris Boulevard up to 27,000 ADT, which will incrementally increase noise levels within 50 feet of the roadway by 1.9 dbA over existing levels, to 76.5 dBA CNEL. According to the Noise Element, this is not considered a significant increase.

The proposed project will would contribute incremental but negligible increases to current traffic volumes, and therefore, traffic noise. The projected increase in trips from the project represents less than 2% of the existing trips on Perris Boulevard, and it is likely that some of the project generated trips will be distributed on several area roadways other than Perris Boulevard. These 284 new trips are also about 3% of the total increase in traffic volumes anticipated under the General Plan. Based on this, traffic noise increases along Perris Boulevard would be negligible, and less than significant. (Source: 1, 4, 13, 19)

b. Groundborne Vibration. *Less Than Significant Impact.* The project site is not adjacent or in close proximity of railroad tracks, and ground borne vibration or noise resulting from construction

activity will be temporary (see 13.a. above). The potential for groundborne vibration and noise is typically greatest when vibratory or large equipment such as rollers, impact drivers, or bulldozers are in operation. For the proposed project, these types of equipment would primarily operate during site preparation, grading, and paving work. This equipment would, at worst-case and for very limited period of times, operate adjacent to the site's property lines and within approximately 60 feet of the light industrial building façade to the west of the site, and about 75 feet from existing non-residential buildings already constructed as part of earlier phases of the project on the site. The average distance from the center of future construction activities to the nearest buildings to the west or east is about 200 feet. All other buildings would considerably farther from potential construction activities. It has been estimated for other recent projects in the area that groundborne vibration from construction activities could be 0.015-0.023 inches/second at distances between 280 and 185 feet. Based on that scale, and equations contained in the Caltrans *Transportation and Construction Vibration Guidance Manual* it is estimated that groundborne vibration at nearby buildings as close as 60 feet could be in the vicinity of 0.03-0.05 inches/second.

The City does not maintain numeric significance thresholds for groundborne vibration or groundborne noise; however, because construction equipment vibration levels at the nearest building location could exceed commonly accepted "distinctly perceptible" vibration detection thresholds (0.012 inches/second) when operating in close proximity to the nearest building and could, therefore, likely be perceptible at this building location. This, however, is not considered to be excessive, because any worst-case equipment operations in proximity to the nearest building would be short in duration and intermittent (lasting only a few hours each day and no more than a few days or week in total near specific building locations). Additionally, potential construction vibration levels would not result in structural damage because the estimated vibration levels are substantially below commonly accepted thresholds for potential damage to modern industrial and commercial buildings (0.5 inches/second). Construction vibration levels would also be substantially below human perception and structural damage thresholds at the nearest residential receptor located approximately 1,600 feet from the project site. For these reasons, the proposed project would result in a less than significant groundborne vibration or groundborne noise impact from construction activities and no mitigation is required. (Sources: 15, 23)

c. Airport Noise. *Less Than Significant Impact.* The project site is located approximately 1 mile east and slightly south of March Air Reserve Base/Inland Port Airport and is located outside the 60 CNEL noise contour area. Noise levels of up to 65 dBA CNEL are normally acceptable for office buildings, business, commercial, professional, and mixed-use development without any special noise insulation requirements. Therefore, potential impacts would be less than significant.

The project is not located within the vicinity of any private airstrip. No significant noise impacts from private facilities are anticipated as a result of this proposal. (Sources: 1, 15)

Findings and Mitigation: The project would be required to implement the following mitigation measures from the PVCCSP EIR:

> **MM Noise 1:** During all project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site

MM Noise 2: During all construction, stationary construction equipment, stockpiling and vehicle staging areas will be placed a minimum of 446 feet from the closest sensitive receptor.

MM Noise 3: No combustion-powered equipment, such as pumps or generators, shall be allowed to operate within 446 feet of any occupied residence unless the equipment is surrounded by a noise protection barrier.

MM Noise 4: Construction contractors of implementing development projects shall limit haul truck deliveries to the same hours specified for construction equipment. To the extent feasible, haul routes shall not pass sensitive land uses or residential dwellings.

ISSUES:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
XIV. POPULATION AND HOUSING -- Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

There are no Standards and Guidelines or mitigation measures related to population and housing resources included in the PVCCSP or associated PVCCSP EIR.

a. Population Growth: *No Impact.* The City of Perris's population in 2020 was 78,575 (Department of Finance, Report E-5). When compared to the City's 2010 population of 68,386, this shows the city's relatively fast recent growth, a 15% increase in a 10-year period. Non-residential growth in the project area has been on-going and facilitated by the City adoption of the PVCCSP in 2012. The PVCC area and its surroundings are in transition from an agricultural past to a modern-day commerce center providing for the needs of an ever- expanding regional market. The PVCC is primarily designated for light industrial land uses based on the area's proximity to March Air Reserve Base/Inland Port Airport and the restrictions associated with the airport, but also contains commercial, general industrial, business/professional office, residential, and public land use designations.

The proposed project would include three multi-tenant business professional office concrete tilt-up buildings, with a total building area of 66,686 square feet, which would have the effect of creating and possibly attracting jobs to the City. The location would bring applicants for these jobs from both Perris and surrounding areas. The extent to which the new jobs created by a project are filled by existing residents is a factor that tends to reduce the growth-inducing effect of a project. In addition to permanent full-time and part-time employment opportunities, the proposed project would also create short-term jobs during the construction phase. These short-term positions would be filled by workers who, for the most part, would reside in the project area. Therefore,

construction of the proposed project would not generate an unplanned permanent increase in population within the project area.

The proposed development would use existing roadways and connect to existing utility systems. Since these systems are already in place, limited expansion of infrastructure is necessary beyond minor street improvements, some of which have already been provided by the applicant as part of a previous application that was not constructed. The proposed project would not indirectly induce an unplanned growth in population due to infrastructure improvements, and no mitigation is required beyond standard road improvements. Therefore, no impact would occur. (Sources: 15, 17)

b. Displacement: *No Impact.* The proposed project would be constructed on vacant land and would not result in the removal of any existing housing, require the construction of replacement housing, nor displace any existing residents. Since no relocation of existing residents or construction of replacement housing would result, no impact associated with this issue would occur. No mitigation is required. (Source: 1, 15)

Findings and Mitigation: Less than significant impacts would occur, therefore, no mitigation is required.

ISSUES:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporation**	**Less Than Significant Impact**	**No Impact**
XV. PUBLIC SERVICES - Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?			X	
d) Parks?				X
e) Other public facilities?			X	

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

There are no PVCCSP EIR mitigation measures related to public services. The PVCCSP Standards and Guidelines relevant to the analysis of impacts to public services summarized below are incorporated as part of the proposed Project and assumed in the analysis presented in this section.

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

4.2.1 Crime Prevention Measures

Development projects should take precautions by installing on-site security measures...Security and safety of future users of facilities constructed within the Perris Valley Commerce Center

Specific Plan should be considered in the design concepts for each individual development proposal such as:

- Sensored lights that automatically operate at night.
- Installation of building alarm, fire systems, and video surveillance.
- Special lighting to improve visibility of the address.
- Graffiti prevention measures such as vines on wall and anti-graffiti covering.
- Downward lighting through development site.

Off-Site Design Standards and Guidelines (from Chapter 5.0 of the PVCCSP)

5.4 Off-Site Infrastructure Standards

All water facilities shall be sized to provide adequate fire protection per the requirements of the City of Perris Building and Safety Department.

a. Fire Services: *Less Than Significant Impact.* The North Perris Fire Station No. 90 is located at 333 Placentia Avenue, approximately 2.5 miles southeast of the proposed project site. It is expected that this fire station would provide first response to the proposed project.

Due to the small, planned increase of people at the Project site that would occur from implementation of the Project, an incremental increase in demand for fire protection and emergency medical services would occur. However, this planned increase in employees on-site is limited and would not increase demands such that the existing fire station would not be able to accommodate servicing the project in addition to its existing commitments, and provision of a new or physically altered fire station would not be required that could cause environmental impacts.

City Ordinance No. 1182 establishes a developer impact fee (DIF) to mitigate the cost of public facilities needed to offset the impact of developing new facilities to support fire services. The proposed project would be required to comply with Ordinance No. 1182 in order to offset potential impacts to the local fire department.

Since the proposed project does not include any new housing, any potential impacts would be considered incremental and can be offset through the payment of the appropriate development impact fees. The proposed project would also be required to comply with all applicable fire code requirements for construction and access to the site and as such, would be reviewed by the City Fire Department to determine the specific fire requirements applicable to ensure compliance with these requirements. Thus, the proposed project would not result in substantial adverse physical impacts related to fire protection. Therefore, potential impacts would be less than significant. (Source: 1, 3)

b. Police Services: *Less Than Significant Impact.* The City contracts with the Riverside County Sheriff's Office to provide police services for the City. The Perris police station is located at 137 North Perris Boulevard, approximately 4.8 miles south of the proposed project site.

Due to the small planned increase in on-site people that would occur from implementation of the project, an incremental increase in demand for police protection could occur. However, the project would include security lighting and other security measures. In addition, the increase in demand

would be limited and would not require provision of a new or physically altered police facility that could cause environmental impacts and impacts would be less than significant.

As stated in Section XV.a, Ordinance No. 1182 establishes a developer impact fee to mitigate the cost of public facilities to serve new development. The Sheriff's Department receives a portion of these developer impact fees, which are collected and distributed in order to offset the impact of developing new facilities to support sheriff services. The proposed project would be required to comply with Ordinance No. 1182 in order to offset potential impacts to the local police department. Thus, the proposed Project would not result in substantial adverse physical impacts related to police protection. Therefore, potential impacts would be less than significant. (Source: 1, 3)

c. School Services: *Less Than Significant Impact.* The project site is located within the boundaries of the Val Verde Union School District. The proposed project would not directly create a source of school-aged children as it does not include any housing. Therefore, it would not generate the need for new or physically altered school facilities and impacts would be less than significant. However, it may indirectly affect schools by providing a source of planned employment that may draw new residents into the area. Appropriate developer impact fees, as required by state law, would be assessed and paid to the school district. Any potential impacts would be considered incremental and would be offset through the payment of the appropriate development impact fees. Thus, the proposed project would not result in substantial adverse physical impacts related to schools. Therefore, potential impacts would be less than significant. (Source: 1, 3)

d. Parks: *No Impact.* The project is non-residential and would not result in the need for park space. Any potential impacts would be mitigated through the payment of development impact fees. Therefore, no impact would occur. (Source: 1, 3)

e. Other Public Facilities: *Less Than Significant Impact.* The proposed project would not directly increase the demand for library or other public services because it does not include new residential uses. The City contracts with the Riverside County Public Library System and provides library services at Cesar E. Chavez Library located at 163 E. San Jacinto Boulevard. The proposed project would be subject to development impact fees that are used to construct new library facilities or expand existing library facilities subsequent to increased demand. Since the proposed project does not include new housing, any impacts would be considered incremental and can be offset through the payment of the appropriate library mitigation fees..

The nearest emergency medical service available to the proposed Project area is the Riverside County Regional Medical Facility located at 26520 Cactus Avenue in the City of Moreno Valley. Healthcare facilities are developed in response to perceived market demand by free enterprise. Therefore, the development of the proposed project would not result in the construction for new or expanded medical facilities. The PVCCSP EIR Initial Study determined that any substantial adverse physical impacts associated with the provisions of new or physically altered medical facilities associated with development within the PVCC area is considered to be less than significant. Therefore, potential impacts would be less than significant. (Source: 1, 3)

Findings and Mitigation: Impacts are considered less than significant, therefore no mitigation is required.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION -				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?				X

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

There are no PVCCSP EIR mitigation measures related to recreation. The PVCCSP Standards and Guidelines relevant to recreation summarized below are incorporated as part of the proposed Project and assumed in the analysis presented in this section.

Business/Professional Office Design Standards and Guidelines (from Chapter 9.0 of the PVCCSP)

9.2.1.3 Plazas, Employee Break Areas, and Amenities

Business Parks should provide a shared outdoor break area. It should include tables and seating covered by overhangs, patio covers, or pergolas. This area should be defined to create a sense of privacy from public and separation through the use of enhanced landscaping, low garden walls, or combination thereof.

a. Demand for Parks and Recreation: *No Impact.* The proposed project is a non-residential development and does not include new recreational facilities. It would not have an impact or increase the demand for new parks or recreational facilities. Therefore, no impact would occur. (Source: 1, 15)

b. Construction of Recreational Facilities: *No Impact.* The proposed project is a non-residential development and will not have an impact or increase the demand for new parks or recreational facilities. Therefore, no impact would occur. (Source: 1, 15)

Findings and Mitigation: No impacts would occur, so no mitigation is required.

ISSUES:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION - Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?			X	
c) Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?			X	

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

The PVCCSP Standards and Guidelines summarized below relevant to the analysis of transportation/traffic presented in this Initial Study are incorporated as part of the proposed Project and assumed in the analysis presented in this section.

Onsite Design Standards and Guidelines (from Chapter 4.0 of the PVCCSP)

4.2.2.3 Pedestrian Access and On-Site Circulation

Avoid Conflicts Between Pedestrian and Vehicular Circulation. Provide a system of pedestrian walkways that avoids conflicts with vehicle circulation through the utilization of separated pathways for direct pedestrian access from public rights-of-way and parking areas to building entries and throughout the site with internal pedestrian linkages.
Primary Walkway. Primary walkways should be 5 feet wide at a minimum and conform to ADA/Title 24 standards for surfacing, slope, and other requirements.
Pedestrian Linkages to Public Realm. A minimum five-foot wide sidewalk or pathway, at or near the primary drive aisle, should be provided as a connecting pedestrian link from the public street to the building(s), as well as to systems of mass transit, and other on-site building(s).

The following mitigation measures from the PVCCSP EIR would be implemented by the project.

> 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 would serve the project area, road improvements adjacent to the project site shall be designed to accommodate future bus turnouts at locations established through consultation with the RTA. RTA shall be responsible for the construction and maintenance of the bus

stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalk and curb and gutter at bus stops and the use of ADA-compliant paths to the major building entrances in the project.

MM Trans 5: Bike racks shall be installed in all parking lots in compliance with City of Perris standards.

MM Trans 7: Implementing project-level traffic impact studies shall be required for all subsequent implementing development proposals within the boundaries of the PVCCSP as approved by the City of Perris Engineering Department. These subsequent traffic studies shall identify specific project impacts and needed roadway improvements to be constructed in conjunction with each implementing development project. All intersection spacing for individual tracts or maps shall conform to the minimum City intersection spacing standards. All turn pocket lengths shall conform at least to the minimum City turn pocket length standards. If any of the proposed improvements are found to be infeasible, the implementing development project applicant would be required to provide alternative feasible improvements to achieve levels of service satisfactory to the City.

The transportation section has been prepared based on a February 2024 Focused Traffic Impact Analysis prepared by Linscott Law & Greenspan Engineers, which was prepared in accordance with PVCCSP EIR mitigation measure MM Trans 7 and is attached as Appendix B to this Initial Study. The analysis included below summarizes information from that report related to determining whether potential impacts are significant under CEQA. Please refer to the report for more detailed information related to trip generation and distribution. The entire report is considered to be part of the Initial Study analysis by reference. Notably, the transportation study includes a discussion of impacts related to levels of service (LOS) which, while important from a citywide circulation standpoint and for the development of conditions of approval, is no longer related to a significance threshold under CEQA. Nevertheless, discussion of the findings of that analysis is included in the Focused Traffic Impact Analysis for informational purposes. (Source: 20) By preparing the Focused Traffic Impact Analysis, the project has complied with PVCCSP EIR mitigation measure MM Trans 7.

a. Potential Conflicts with Transportation Plans and Policies. *Less Than Significant Impact.* The proposed project would be on land zoned Commercial within the PVCCSP, and with a Planned Development Overlay (PDO), would be consistent with the Specific Plan and General Plan, and would not conflict with any City transportation planning efforts related to transit, roadways, bicycles or pedestrians. Please refer to Table 7 in Section XI., Land Use and Planning, for a more detailed analysis of the project's consistency with General Plan policies, including those in the Circulation Element. As discussed in Table 7, the project would be consistent with relevant Circulation Element policies.

The project would be required to comply with PVCCSP EIR mitigation measures MM Trans 1 through MM Trans 5. PVCCSP EIR mitigation measure MM Trans 4 requires project applicants to contact the Riverside Transit Agency (RTA) prior to the approval of each implementing development project to determine if the RTA has plans for the future provision of bus routing within any street that is adjacent to the implementing development project that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that will serve the implementing development project, road improvements adjacent to the project site shall be designed to accommodate future bus turnouts at locations established through

consultation with the RTA. The RTA shall be responsible for the construction and maintenance of the bus stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalks and curb and gutter at bus stops and the use of ADA-compliant paths to the major building entrances in the project. In response to this PVCCSP EIR mitigation measure, the project applicant contacted the RTA on July 31, 2024. RTA staff indicated that no changes in operations in the vicinity of the project site are contemplated at this time. By contacting the RTA prior to project approval, the project has complied with the requirements of PVCCSP EIR mitigation measure MM Trans 4.

b. Conflicts or Inconsistencies with CEQA Guidelines § 15064.3, subdivision (b). *Less Than Significant Impact.* State CEQA Guidelines 15064.3(b) establishes criteria for analyzing transportation impacts in a CEQA document, replacing the traditional LOS-based approach in favor of an approach based on vehicle miles traveled (VMT), consistent with SB 743. On December 28, 2018, the California Natural Resources Agency adopted revised State CEQA Guidelines. Among the changes to the guidelines was the removal of vehicle delay and LOS from consideration for transportation impacts under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled. Lead agencies are allowed to continue using their current impact criteria, or to opt into the revised transportation guidelines.

According to the updated State CEQA Guidelines, vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact. The following SB 743 Assessment to address VMT impacts is summarized from the attached Focused Traffic Impact Analysis.

SB 743 VMT ASSESSMENT

Under the VMT methodology, screening is used to determine if a project will be required to conduct a detailed VMT analysis. The following section discusses the various screening methods outlined in the *City of Perris Transportation Impact Analysis Guidelines for CEQA (dated May 12, 2020),* hereinafter referred to "VMT Guidelines", and outlines whether the Project will screen-out, either in its entirety, or partially based on individual land uses. Based on the VMT Guidelines, the first step in evaluating a land use project's VMT impact is to perform an initial screening assessment utilizing the City of Perris VMT Scoping Form for Land Use Projects, hereinafter referred to as "VMT Scoping Form". The VMT Scoping Form provides a tool for streamlining the VMT analysis process and the automated spreadsheet provided by the Planning Department was utilized and contained in the attached traffic study (**Appendix B**). A project is presumed to have a less than significant impact on VMT if the project satisfies at least one of the VMT screening criteria. The VMT screening criteria and their applicability to the project are discussed below.

A. Is the Project 100% Affordable Housing?

The *VMT Guidelines* state:

"If a project consists of 100% affordable housing, then the presumption can be made that it will have a less than significant impact on VMT. According to sources provided by OPR, affordable housing projects typically generate lower VMT than market-rate housing and a project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less than significant impact on VMT. Furthermore, a project which includes any affordable residential units may factor in the effect of the affordability on VMT into the assessment of VMT generated by those units"

Based on the above, the VMT Guidelines and the VMT Scoping Form, the proposed project will not screen out under this criterion since it is not 100% affordable housing.

B. Is the Project within One Half (½) Mile of Qualifying Transit?

The *VMT Guidelines* state:

"CEQA Guideline Section 15064.3, subdivision (b)(1), states that lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within one half (½) mile of an existing major transit stop or an existing stop along a high quality transit corridor will have a less than significant impact on VMT.

Not all projects located near qualifying transit are presumed to have a less than significant impact. The presumption of less than significant does not apply if the project.

Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
Replaces affordable residential units with a smaller number of moderate or high-income residential units."

Based on the above, the VMT Guidelines and the VMT Scoping Form, the proposed project will screen out under this criterion since it is located within one half (½) mile of a qualifying transit stop, which is located on Perris Boulevard less than a block south of the project site. It should be noted that the project will not provide more parking than required by the City, is consistent with Connect SoCal and does not replace affordable housing.

C. Is the Project a Local Serving Land Use?

The *VMT Guidelines* state:
"*Local serving land uses provide more opportunities for residents and employees to shop, dine and obtain services closer to home and work. Local serving uses can also include community resources that may otherwise be located outside of the city or local area.*
By improving destination proximity, local serving uses lead to shortened trip lengths and reduced VMT. Therefore, local serving uses may be presumed to have a less than

significant impact on VMT. The following list contains the eligible local serving uses in the City of Perris:

Local Serving Retail < 50 TSF
Education/Institutional
Municipal/Public Services

Based on the above, the VMT Guidelines and the VMT Scoping Form, the proposed project will not screen out under this criterion since it is not local serving retail.

D. Is the Project in a Low VMT Area?

The *VMT Guidelines* state:
"*Projects that locate in areas with low VMT, and that incorporate similar features (i.e., land use type, access to the circulation network, etc.), will tend to exhibit similarly low VMT. If a project is located in a Traffic Analysis Zone (TAZ) with VMT per capita or VMT per employee that is less than or equal to the Citywide average, then the project is considered to be located in a low VMT area and can be presumed to have a less than significant impact on VMT.*

Based on the above, the VMT Guidelines and the VMT Scoping Form (with use of the current RIVCOM WRCOG Screening Tool), the proposed project will screen out under this criterion since it is located in a low VMT area. As shown in *Appendix E,* the Project (TAZ 1873) VMT/Employee is 16.9 which is lower than the Citywide VMT/Employee threshold of 17.1.

E. Are the Project's Net Daily Trips less than 500 ADT?

The *VMT Guidelines* state:
"*Projects that generate less than 500 average daily trips (ADT) would not cause a substantial increase in the total citywide or regional VMT and are therefore presumed to have a less than significant impact on VMT."*

Based on the above, the VMT Guidelines and the VMT Scoping Form, the proposed project will screen out under this criterion since the project is projected to generate approximately 284 gross daily trips, which is lower than the 500 net daily trips threshold.

Consistent with the *City of Perris VMT Guidelines,* the *City of Perris VMT Scoping Forms* and based on the VMT screening methodology and findings outlined in this section, the proposed project satisfies at least three of the VMT screening criteria (i.e. located within one half (½) mile of qualifying transit, located in a low VMT area, and generating less than 500 net daily trips) and thus would screen out. Therefore, in accordance with the City of Perris VMT Guidelines, the proposed project is exempt from the preparation of any further VMT analysis and shall be presumed to have a less than significant CEQA-related transportation impact.

c. Transportation Hazards Related to Design Features. *Less Than Significant Impact.* The project would not include features that contribute to potentially hazardous transportation conditions. The following analysis considers potential safety impacts from driveway queueing and internal circulation.

PROJECT DRIVEWAY QUEUING EVALUATION

To address stacking/storage lengths at the two existing project site driveways, a queuing evaluation was prepared based on projected Year 2026 Cumulative Plus Project traffic volumes. As requested by City of Perris staff, the storage provided for the southbound right-turn lane at Project Driveway No. 1 and the storage provided for the southbound right-turn lane and eastbound left-turn lane at Project Driveway No. 2 was evaluated. **Table 8** presents the project driveways queuing analysis results for Year 2026 Cumulative Plus Project traffic conditions. As shown in **Table 8**, adequate storage is provided to accommodate the forecast 95th percentile queues under Year 2026 Cumulative Plus Project traffic conditions for the two existing project site driveways.

TABLE 8.
YEAR 2026 CUMULATIVE PLUS PROJECT PEAK HOUR QUEUING ANALYSIS[4]
MARCH PLAZA PROJECT, PERRIS

Key Intersection	Estimated Storage Provided	Year 2026 Cumulative Plus Project Traffic Conditions			
		AM Peak Hour		PM Peak Hour	
		Max. Queue	Adequate Storage (Yes / No)	Max. Queue	Adequate Storage (Yes / No)
1. Project Driveway No. 1 at Harley Knox Boulevard					
Southbound Right-Turn	50'	25'	Yes	25'	Yes
2. Project Driveway No. 2 at Harley Knox Boulevard					
Southbound Right-Turn	40'	25'	Yes	25'	Yes
Eastbound Left-Turn	210'	25'	Yes	25'	Yes

As requested by City staff, the need for a westbound right-turn deceleration lane at existing Project Driveway No. 2 was evaluated. Per the *Highway Capacity Manual 2000*, "an exclusive right-turn lane should be considered if the right-turn volume exceeds 300 veh/h and the adjacent mainline volume exceeds 300 veh/h/ln." Based on review of the forecast peak hour right-turning volumes (i.e. less than 300 right-turns) and the peak hour level of service calculations, a westbound deceleration lane is not needed at existing Project Driveway No. 2.

It should be noted that the two existing driveways along Harley Knox Boulevard are spaced approximately 350 feet apart (center-to-center). Although the spacing does not satisfy the specific requirements of the PVCCSP, 350 feet is adequate, given that outbound movements at both existing driveways are restricted to right-turns out only.

INTERNAL CIRCULATION EVALUATION

Based on the analysis in the attached traffic study, the on-site circulation layout of the proposed project as illustrated in this Initial Study on an overall basis is considered adequate. Curb return radii have been confirmed and are generally adequate for small service/delivery (FedEx, UPS)

[4] Queue is based on the *95th Percentile Queue* and is reported in total queue length (feet) per lane for signalized intersections.

vehicles, trash trucks and trucks. Potential impacts related to access or circulation conflicts would be less than significant.

d. Emergency Access Conflicts. *Less Than Significant Impact.* As described above site access and internal circulation would be adequate to avoid safety of queueing issues. For that reason, the project would have adequate access for emergency vehicles.

Findings and Mitigation: The project would be required to implement the following mitigation measures from the PVCCSP EIR. Other PVCCSP EIR mitigation measures have already been implemented as part of the approval of earlier project phases, including mitigation measures MM Trans 1 and MM Trans 2, or have been conducted as part of the current application (MM Trans 7):

> **MM Trans 3:** Each implementing development project shall particulate 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 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 buildout level.
>
> **MM Trans 5:** Bike racks shall be installed in all parking lots in compliance with City of Perris standards.

ISSUES:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
XVIII. TRIBAL CULTURAL RESOURCES - Would the project:				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or		X		
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X		

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

There are no Standards and Guidelines included in the PVCCSP related to tribal cultural resources. PVCCSP EIR mitigation measures that are applicable to tribal cultural resources are discusses in Section V., Cultural Resources of this Initial Study.

a. Tribal Cultural Resources. *Less Than Significant With Mitigation.* Prior to the original project approval in 2017, a Sacred Lands File database search was requested from the Native American Heritage Commission (NAHC) on May 13, 2016 and a response was received on May 17, 2016. The NAHC Sacred Lands File database search did not indicate the presence of Native American cultural resources in the immediate project area. However, the NAHC noted that the absence of specific site information does not indicate the absence of cultural resources in any project area and that other resources should be consulted to obtain information regarding known and previously recorded sites.

A total of 35 scoping letters were sent to the tribes and individuals named by the NAHC on May 20 and 30, 2016. As a result of the information scoping process, no specific information was obtained about the presence or absence of Native American resources in or near the project area. (Source: 12)

As the current project requires a Specific Plan Amendment, the City as lead agency is required to consult with local Native American tribes pursuant to AB 52 and SB 18.

AB 52 (Chapter 532, Statutes of 2014) established a formal consultation process for California Native American tribes as part of CEQA and equates significant impacts on tribal cultural resources with significant environmental impacts (Public Resources Code [PRC] Section 21084.2). AB 52 consultation requirements went into effect on July 1, 2015, for all projects that had not already published a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration or published a Notice of Preparation of an Environmental Impact Report prior to that date (Section 11 [c]). Specifically, AB 52 requires that "prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the lead agency shall begin consultation" (21808.3.1 [a]), and that "the lead agency may certify an environmental impact report or adopt a mitigated negative declaration for a project with a significant impact on an identified tribal cultural resource only if" consultation is formally concluded (21082.3[d]).

In addition to AB 52, SB 18 requires a city or county to consult with the NAHC and any appropriate Native American tribe for the purpose of preserving relevant Traditional Tribal Cultural Places prior to the adoption, revision, amendment, or update of a city's or county's general plan, specific plan, or designating land as open space. SB 18 provides a new definition of Traditional Tribal Cultural Places, which requires that the site must be shown to actually have been used for activities related to traditional beliefs, cultural practices, or ceremonies. In addition, SB 18 law also adds California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.

The City of Perris used their experience and input from the NAHC to send AB 52 Notices to the following local Native American tribes on November 30, 2022:

- Agua Caliente Band of Cahuilla Indians
- Rincon Band of Luiseño Indians
- Soboba Band of Luiseño Indians

- Morongo Band of Mission Indians
- Pechanga Band of Indians

Per AB 52, tribes that are contacted have 30 days to notify the lead agency if they wish to consult on that particular project. Three of the tribes responded to the City. The following describes the results of the City's Native American Consultation process for the proposed project.

- December 20, 2022 – Staff received a letter from the Rincon Band of Luiseño Indians to consult. Requested a date a time to consult.
- January 3, 2022 – Staff received a letter request to consult with the Agua Caliente Band of Cahuilla Indians which they requested cultural resources report. The cultural report was provided to the tribe (by link) and City staff requested date and time to consult.
- January 5, 2022 – Staff received a request via email from the Pechanga Band of Indians to commence SB 18/AB 52 consultation and to obtain the cultural report. Staff responded to Juan Ochoa (representative) by providing the cultural report and requested a date and time to consult.
- January 31, 2023 – Staff received correspondence from the Agua Caliente Band of Cahuilla Indians with a request for cultural monitoring and discovery of human remain procedure which are covered by the City's standard mitigation measures.

The project site is an urban infill site that is currently vacant. The site is highly disturbed as a result of past development. Therefore, if any tribal cultural resources were present on the surface of the project site in the past, it is highly unlikely that they would be present today. Nonetheless, there is the potential that previously unidentified archaeological resources may be discovered during construction-related ground disturbance for the project. In addition, construction workers are generally not trained in the identification of tribal cultural resources. Therefore, project-specific mitigation measures MM CR-1 and MM CR-2 shall be implemented to reduce potential impacts related to archaeological resources, including human remains. Project-specific mitigation measures MM CR-1 and MM CR-2 replace PVCCSP EIR mitigation measures MM Cultural 2, MM Cultural 3, MM Cultural 4, and MM Cultural 6 as subsequently revised by the City of Perris. (Sources: 1, 12). With completion of consultation pursuant to AB 52 and SB 18, and implementation of project-specific mitigation measures MM CR-1 and MM CR-2, potential impacts to tribal cultural resources would be less than significant.

Findings and Mitigation: Project-specific mitigation measures MM CR-1 and MM CR-2, as described in Section V., Cultural Resources.

ISSUES:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
XIX. UTILITIES AND SERVICE SYSTEMS -Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local statutes and regulations related to solid waste?			X	

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

There are no PVCCSP Standards and Guidelines or PVCCSP EIR mitigation measures related to the analysis of utilities and service systems.

a. Utilities Infrastructure: *Less Than Significant Impact.* The City Engineer will require that the project connect to the City's existing water and sewer infrastructure system to serve the project site, and comply with Eastern Municipal Water District (EMWD) requirements. Existing water and sewer infrastructure is located within the rights of way for both Perris Boulevard and Harley Knox Boulevard, and currently serves development adjacent to those major roadways. The preliminary hydrology and drainage study confirms that the proposed infrastructure improvements will not require the construction of new water or wastewater treatment facilities or expansion of existing facilities, and therefore will not cause any significant environmental effects. The project would not exceed the wastewater treatment requirements of the Santa Ana Regional Water Quality Control Board and the potential impact would be less than significant.

The site currently drains north to the existing Lateral B of the Perris Valley Channel. Developed condition drainage patterns will not be diverted and will remain to flow north to the Lateral B of the Perris Valley Channel.

Storm drain facilities would be designed in accordance with the City Engineer, Riverside County Flood Control and Water Conservation District design standards to provide protection from a 100-year storm event. Storm water flows will be directed to Lateral B and away from Harley Knox Boulevard, as the site currently drains. By complying with these requirements, all potential impacts would be less than significant.

No expansion of any other utilities infrastructure will be required. The project would connect with existing power and communications infrastructure, both of which are available to serve the project site. (Source: 1, 10)

b. Water Supplies: *Less Than Significant Impact.* In compliance with Sections 10910–10915 of the California Water Code (commonly referred to as "Senate Bill [SB] 610" according to the enacting legislation), a Water Supply Assessment was prepared for the PVCCSP to assess the impact of development allowed under the PVCCSP on existing and projected water supplies. The EMWD approved this Water Supply Assessment in July 2011 and determined that existing and planned EMWD water supplies are sufficient to meet PVCC-related demands. Since the proposed project would be consistent with the existing land use designation for the site, the water usage that would be attributed to development of the project site would have been accounted for in the Water

Supply Assessment. Recently, the EMWD adopted its 2020 Urban Water Management Plan (UWMP), which contains more accurate projections for water supply and ability to serve the project area.

Development within the PVCC area will increase demand for water supplies within the EMWD's service area. According to the PVCCSP Water Supply Assessment, based on the PVCCSP land use designations, at buildout, the PVCC is anticipated to have a projected water demand of approximately 2,671.5 acre-feet per year. The Water Supply Assessment prepared for the PVCCSP determined that there would be sufficient water supplies to serve proposed development within the PVCC area.

The EMWD adopted its 2020 UWMP, which details the reliability of the EMWD's current and future water supply. The EMWD has four sources of water supply: imported water from the Metropolitan Water District of Southern California (MWD), local groundwater, desalinated groundwater, and recycled water. (EMWD UWMP, p. 3-3.) The EMWD has several planned projects that will increase regional supply reliability by increasing local water supplies and decreasing demands for imported water from the MWD including increasing local groundwater banking through the Enhanced Recharge and Recovery Program, expanding the desalter program with the Perris II Desalter, and full utilization of recycled water through implementation of an Integrated Resource Plan. (EMWD UWMP, p. 7-12.) Additionally, the EMWD aggressively promotes the efficient use of water through implementation of local ordinances, conservation programs and an innovative tiered pricing structure. (EMWD UWMP, p. 7-1.)

According to the 2020 UWMP, approximately 50 percent of the EMWD's total retail supply was imported from the MWD (EMWD UWMP, p. 6-2.) The MWD has also prepared a Regional UWMP and Integrated Water Resource Plan to detail their ability to provide water in times of shortage and address concerns regarding water supply reliability based on recent judicial decisions affecting the SWP and potential impacts due to climate change and drought. Based on the information provided in the MWD's 2015 UWMP, the MWD has sufficient supply capabilities to meet the expected demands of its member agencies from 2025 through 2045 under normal, historic single-dry and historic multiple-dry year conditions. (MWD, pp. ES-5 – ES-6.)

The EMWD determined that it will be able to provide adequate water supply to meet the potable water demand for future development allowed under the PVCCSP as part of its existing and future demands. Therefore, it can be concluded that there are sufficient water supplies available to serve the proposed project, which is consistent with the land use assumptions of the PVCCSP, from the EMWD's existing entitlements and resources as set forth in its 2020 UWMP and the MWD's 2020 UWMP. Therefore, because the proposed project is consistent with the land use designation for the site that was assumed in the most recent UWMPs, and with payment of applicable fees, potential impacts to water supplies would be less than significant.

c. Wastewater Treatment: *Less than Significant Impact.* Wastewater collection and treatment service would be provided by the EMWD. Wastewater from the project would be treated at the Perris Valley Regional Water Reclamation Facility. The project would connect to the existing 18-inch-diameter sewer pipeline in Harley Knox Boulevard.

Development under the PVCCSP, of which the project would be consistent and a part, will result in an increase in the amount of wastewater generated within the EMWD's service area. The PVCC is anticipated to generate approximately 5,316,295 gallons (5.3 million gallons per day) of

wastewater per day to be treated at the Perris Valley Regional Water Reclamation Facility at build-out. (PVCCSP EIR, p. 4.11-27.)

As of 2021, the Perris Valley Regional Water Reclamation Facility accepts approximately 15.5 million gallons per day but has a current treatment capacity of 22 million gallons per day. (PVRWRF 2021.) Thus, the total demand from the PVCC represents approximately 59 percent of the current Perris Valley Regional Water Reclamation Facility capacity. A portion of the current wastewater treated at the Perris Valley Regional Water Reclamation Facility consists of diversions from elsewhere in the EMWD's service area. Therefore, because the EMWD's wastewater diversions are operational decisions and because there is sufficient capacity in the EMWD's other wastewater treatment facilities to accommodate additional wastewater flows, overall the EMWD has sufficient capacity to treat the wastewater generated by the PVCC developments.

Based on the wastewater generation factor of 1,700 gallons per day per acre for Business Park/Professional Office, Commercial, General Industrial, and Light Industrial PVCCSP land use designations applied in the PVCCSP EIR, the project's proposed development 4.37 acres would generate approximately 7,429 gallons per day (0.007 million gallons per day) of wastewater that would be treated at the Perris Valley Regional Water Reclamation Facility. As such, the proposed project's wastewater generation represents less than one percent of the PVCCSP's total estimated wastewater generation (5.3 million gallons per day).

Since the proposed project consists of construction and operation of uses that are consistent with the land use designation in the PVCCSP and the wastewater generation analysis assumptions used for the PVCCSP EIR, the project would not result in impacts greater than those analyzed in the PVCCSP EIR. Therefore, implementation of the proposed project would have a less than significant impact on the EMWD's ability to treat wastewater and would not contribute significantly to the need for construction or operation of new or expanded wastewater facilities.

d. Solid Waste Generation: Cumulatively, construction associated with current and future projects within the PVCCSP area is anticipated to generate approximately 104,671 tons of construction-related solid waste over a 20-year buildout period. Given the limited contribution of solid waste during an extended construction period, the PVCCSP EIR concluded that construction within the PVCCSP area would have a less than significant contribution to the exceedance of the permitted capacity of the designated landfills. The project site is within the PVCCSP area. Therefore, potential impacts associated with solid waste production during construction would be less than significant, and no mitigation would be required.

For operations, the proposed project will be served by a landfill with sufficient permitted capacity to accommodate the proposed project's solid waste disposal needs. The Badlands and El Sobrante Landfills, which would serve the Project Site, have the capacity to support the construction and operational waste expected from the Proposed Project. Therefore, potential impacts associated with solid waste production during operations would be less than significant and no mitigation would be required.

e. Solid Waste Statutes and Regulations: *Less than Significant Impact.* Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to decrease solid waste generation through mandatory reductions in solid waste quantities (e.g., through recycling and composting of green waste) and the safe and efficient transport of solid waste. CR&R Incorporated is the City's contracted trash services provider. The proposed project

will comply with all federal, state and local statutes and regulations related to solid waste. The proposed project would be required to coordinate with CR&R to develop a collection program for recyclables, such as paper, plastics, glass and aluminum, in accordance with local and State programs, including the California Solid Waste Reuse and Recycling Act of 1991. Additionally, the proposed Project would be required to comply with applicable practices enacted by the City under the California Integrated Waste Management Act of 1989 (AB 939) and any other applicable local, State, and federal solid waste management regulations.

The California Integrated Waste Management Act under the Public Resource Code requires that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. In addition, Perris Municipal Code Section 7.44.050 requires that project construction divert a minimum of 50 percent of construction and demolition debris. Also, Section 7.44.060 requires the submittal of a waste management plan. In addition, the 2022 CalGreen Code requires new developments to divert 65 percent of construction waste. Thus, the proposed project would be required to comply with federal, state, and local statutes and regulations related to solid waste. Therefore, the potential impact of this project would be less than significant. (Source: 1, 2)

Findings and Mitigation: No significant impacts would occur, so no mitigation is required.

ISSUES:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

Applicable PVCCSP Standards and Guidelines, and Mitigation Measures

There are no PVCCSP Standards and Guidelines or PVCCSP EIR mitigation measures related to the analysis of wildfire.

a. through d. Wildfire Risk and Response: *No Impact.* The California Department of Forestry and Fire Protection (CAL FIRE) has mapped fire threat potential throughout California. CAL FIRE ranks fire threats based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The project site is in a Non-Very High Fire Hazard Severity Zone within a local responsibility area. Therefore, no impacts associated with this issue would occur and no mitigation is required. (Source: 1)

Findings and Mitigation: No impacts would occur, so no mitigation is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		X		
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?		X		

a. Environmental Degradation: *Less Than Significant With Mitigation Incorporated.* All potentially significant adverse impacts identified in this assessment are readily and feasibly offset by standard City practices, regulatory requirements, conditions of approval, and/or mitigation measures that will reduce each impact to a less than significant level. In some cases, mitigation measures are carried forward from the PVCCSP EIR. In other cases, mitigation measures are more project-specific, and modify and replace similar measures included in the PVCCSP EIR.

Impacts related to drainage and water quality were determined to be less than significant. Compliance with stormwater and other water quality regulations ensures that the project's impacts are not cumulatively considerable. Potential impacts related to biological resources and cultural resources were less than significant with mitigation. Standard conditions of approval would also apply. There are no important examples of major period of California history or prehistory that will be impacted by this project.

b. Cumulative Impacts: *Less Than Significant With Mitigation Incorporated.* The proposed project is being developed according to the PVCCSP and is an allowed use under the site's Commercial land use designation in the PVCCSP; however, implementation of the PVCCSP may result in several cumulatively considerable impacts. Analysis contained in the PVCCSP EIR determined that construction associated within the PVCCSP may have cumulatively significant impacts in the following areas: (PVCCSP EIR, p. 5.0-13.)

- Air Quality: Emissions generated by the overall PVCCSP area will exceed the South Coast AQMD's recommended thresholds of significance;

- Noise: Development in the overall PVCCSP area will result in substantial increases in the ambient noise environment at Project buildout;

- Transportation: Potential cumulative impacts to I-215, which is consistent with the findings in the Perris General Plan EIR.

However, as demonstrated by the analysis in this Initial Study, the proposed project would not result in any significant environmental impacts. The project would be consistent with local and regional plans, and the project's operational air quality emissions would not exceed established thresholds of significance. Additionally, the proposed project would not cause a substantial increase in ambient noise levels. The project adheres to all other land use plans and policies with jurisdiction in the project area and would not cause a substantial increase in traffic volumes within the project area. Required implementation of PVCCSP EIR mitigation measures MM Air 2 through MM Air 9, MM Air 11 through MM Air 14, MM Air 19, MM Air 20, MM Noise 1 through MM Noise 4, MM Trans 1 through MM Trans 5, and MM Trans 7 would further reduce the less than significant impacts of the project. Therefore, the proposed project would not have impacts that are individually limited, but cumulatively considerable, and impacts would be less than significant with mitigation incorporated.

c. Impacts to Humans: *Less Than Significant With Mitigation Incorporated.* Effects on human beings were evaluated as part of this analysis of this Initial Study under the aesthetics, air quality, cultural resources as it relates to human remains, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, tribal cultural resources, and utilities and services systems thresholds. Based on the analysis and conclusions in this Initial Study, impacts for these topics were considered to have no impact, less than significant impact, or less than significant with mitigation incorporated. The following are PVCCSP EIR mitigation measures that would be applicable to the proposed project: MM Air 15 and MM Air 18, MM Noise 1 through MM Noise 4, MM Trans 1 through MM Trans 5, and MM Trans 7. The following are project-specific mitigation measures that would be incorporated: MM A-1, MM BR-1, MM CR-1, MM CR-2, and MM GS-1. Therefore, potential direct and indirect impacts on human beings that result from the proposed project would be considered less than significant with mitigation incorporated.

REFERENCES AND SOURCES

The Air Quality and Greenhouse Gas analyses in the Initial Study were prepared by Envicom, while the Transportation analysis was prepared by Linscott, Law and Greenspan Engineers.

Specific sources referenced in the analysis are listed below:

1. City of Perris General Plan 2030
2. City of Perris Zoning Ordinance
3. City of Perris General Plan 2030 Final Environmental Impact Report
4. Perris Valley Commerce Center Specific Plan, revised 2014
5. March Plaza Air Quality and Global Climate Change Traffic Impact Analysis, Kunzman Associates, Inc., July 14, 2016.
6. March Plaza Traffic Impact Analysis, Kunzman Associates, Inc., February 17, 2017.
7. Preliminary Water Quality Management Plan, Alliance Land Planning & Engineering, Inc., December 20, 2016 and January 2023.
8. Phase 1 Environmental Site Assessment, EEI Geotechnical & Environmental Solutions, May 31, 2016.
9. Geotechnical Evaluation, Alliance Land Planning & Engineering, Inc., November 30, 2015.
10. Hydrology Reports – March Plaza, Alliance Land Planning & Engineering, Inc., January 2017.
11. Biological Reconnaissance Survey for the March Plaza Project, Perris, California, Sage Institute, June 10, 2016.
12. Phase 1 Cultural Resources Assessment for the March Plaza Project, L & L Environmental, Inc., June 14, 2016.
13. March Plaza – Noise Impact Analysis, Kunzman Associates, Inc., July 8, 2016.
14. California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP); accessed via internet on February 7, 2017.
15. March Plaza development plans dated December 21, 2022.
16. 7-Eleven development plans dated January 4, 2017.
17. California Department of Finance, Report E-5. Used for estimating City of Perris population; accessed via internet January 10, 2024.
18. Riverside County Integrated Plan, Multiple Species Habitat Conservation Plan (MSHCP).
19. Riverside County Airport Land Use Commission, letter to City of Perris, March 9, 2023.
20. Transportation Impact Analysis, Linscott, Law & Greenspan Engineers. February 2024.
21. Air Quality and Greenhouse Gas Emissions Assessment. Envicom Corporation, January 2024.
22. Negative Declaration for the March Plaza Project (Conditional Use Permit 16-05165, Tentative Parcel Map 16-05166; Conditional Use Permit 16-05171). City of Perris, February 15, 2017.
23. Transportation and Construction Vibration Guidance Manual. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf. April 2020. Accessed July 2024.

Appendix A

Air Quality, Greenhouse Gas Emissions and Energy Report

Appendix B

Traffic Study

Appendix C

Project Plans