Perris Gateway Project

Draft Environmental Impact Report

SCH No. 2024080050

SPA 22-05280; TPM 22-05279 (38567);
TPM 24-05150 (38985); DPR 22-00028; DPR 23-00021;
CUP 22-05295; CUP 24-05141; CUP 24-05142

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ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius
°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
2022 Scoping Plan	2022 Scoping Plan for Achieving Carbon Neutrality
AAM	annual arithmetic mean
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADT	average daily trips
AICUZ	Air Installations Compatible Use Zones
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AOZ	Airport Overlay Zone
AQIA	Air Quality Impact Analysis
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
BMPs	best management practices
CAFE	Corporate Average Fuel Economy
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGAPS	California LBNL GHG Analysis of Policies Spreadsheet
CALGreen	California Green Building Standards Code
CAP	climate action plan
CARB	California Air Resources Board
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CH_4	methane
City	City of Perris
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CUP	Conditional Use Permit
dB	decibels
dBA	decibels with A-weighting

ACRONYMS AND ABBREVIATIONS (cont.)

EIR	Environmental Impact Report
EMWD	Eastern Municipal Water District
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
EV	electric vehicle
HFC	hydrofluorocarbon
HI	Hazard Index
HVAC	heating, ventilation, and air conditioning
I-	Interstate
IPCC	United Nations Intergovernmental Panel on Climate Change
km	kilometer
LBNL	Lawrence Berkeley National Laboratory
LCFS	Low Carbon Fuel Standard
L_{MAX}	maximum noise level
LST	localized significance threshold
m^3	cubic meter
March ARB/IPA	March Air Reserve Base/Inland Port Airport
MATES	Multiple Air Toxics Exposure Study
MBTA	Migratory Bird Treaty Act
mg	milligrams
MICR	maximum individual cancer risk
MLD	most likely descendant
mpg	miles per gallon
mph	miles per hour
MRZ	mineral resource zone
MSHCP	Multiple Species Habitat Conservation Plan
$MTCO_2e$	metric tons of carbon dioxide equivalent
N_2O	nitrous oxide
NAHC	Native American Heritage Commission
NHTSA	National Highway Traffic and Safety Administration
NO	nitric oxide
NO_2	nitrogen dioxide
NO_x	oxides of nitrogen
O_3	ozone
OPR	Office of Planning and Research

ACRONYMS AND ABBREVIATIONS (cont.)

PFC	perfluorocarbon
PM_{10}	Coarse PM, 10 microns or less in diameter
$PM_{2.5}$	Fine PM, 2.5 microns or less in diameter
ppm	parts per million
PPV	peak particle velocity
Project	Perris Gateway Project
PVCC	Perris Valley Commerce Center
PVCCSP	Perris Valley Commerce Center Specific Plan
PVCCSP EIR	Perris Valley Commerce Center Specific Plan Final Environmental Impact Report
RTA	Riverside Transit Agency
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel-Efficient
SB	Senate Bill
SCAG	Southern California Association of Governments
SCE	Southern California Edison
SCH	State Clearinghouse
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company
SP	service population
SR	State Route
SRA	Source Receptor Area
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminant
TDM	transportation demand management
UNFCCC	United Nations Framework Convention on Climate Change
URBEMIS	URBan EMISsions model
U.S.	United States
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Governments
ZEV	zero-emission vehicles

1.0 EXECUTIVE SUMMARY

1.1 Introduction

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

1.2 Project Location

The Project site (Assessor's Parcel Numbers 314-170-020, 314-170-023, and 314-180-024) is located within the western portion of the Perris Valley Commerce Center (PVCC) area (described further below) of the City of Perris and includes approximately 20 acres (20.28 acres) of vacant land. It is located adjacent to Interstate (I-) 215, approximately 6.5 miles south of State Route (SR) 60, and approximately one mile south of March Air Reserve Base/Inland Port Airport (March ARB/IPA). Figure 3-1, *Regional Location*, depicts the Project site in relation to the region. Figure 3-2, *Aerial Photograph*, depicts the existing developed and undeveloped conditions at and surrounding the Project site. As shown, the Project site is located north of Ramona Expressway, west of Webster Avenue, and east of I-215.

1.3 Project Setting

The Project site can generally be characterized as disturbed vacant land that was previously used for agricultural purposes. The Project site is generally flat with an elevation between 1,480 and 1,500 feet above mean sea level. Stormwater runoff generally flows from northwest to southeast within the western two parcels and southwest to northeast on the eastern parcel. Runoff outfalls to a catch basin at the northeast corner of the Project site and flows into Line E of the Perris Valley Storm Drain System, which is owned and maintained by the Riverside County Flood Control and Water Conservation District and runs in an east-west direction along Ramona Expressway.

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

The land uses surrounding the Project site include a mix of undeveloped and developed areas. Surrounding land uses include the Optimus Logistics Center to the north, residential land uses to the northeast, commercial development to the east, currently undeveloped areas to the south, and I-215 to the west. The vacant parcels south of the Project site along Ramona Expressway are designated in the

Perris Valley Commerce Center Specific Plan (PVCCSP) for commercial land uses, as described in Section 1.3.1 below.

The Project site is located approximately one mile south of March ARB/IPA and is located within the March ARB/IPA Airport Influence Area Boundary. The PVCCSP includes an Airport Overlay Zone (AOZ) which defines specific land uses corresponding generally with the boundaries and provisions of the 2014 March ARB/IPA Airport Land Use Compatibility Plan (ALUCP) and airport influence area. The Project site is within Airport Compatibility Zone C1 (Primary Approach/Departure Zone). Development within airport compatibility zones is restricted by the basic compatibility criteria provided in Table MA-2 of the 2014 March ARB/IPA ALUCP which is consistent with the safety and noise standards contained within the 2018 Air Installations Compatible Use Zones (AICUZ) Study. Airport Compatibility Zone C1 is a primary approach/departure zone with limited residential land uses and prohibits noise sensitive land uses and other uses which would cause hazards to flight.

The Project site is not within or adjacent to a Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Conservation Area. It is not within an MSHCP Criteria Cell, Core, or Linkage Area. The Project site is also not in a survey area for mammals, amphibians, Criteria Area Plant Species Survey Area, or Narrow Endemic Plant Species Survey Area.

1.3.1 General Plan and Zoning Designations

The existing City of Perris General Plan land use designation for the Project site is PVCC SP - Perris Valley Commerce Center Specific Plan. The PVCCSP establishes the zoning for the properties within the PVCC area. As shown on Figure 3-3, *PVCCSP Land Use Designations*, the PVCCSP designation for the Project site is Commercial. Commercial land use designations are also identified immediately to the east and south of the Project site. Light Industrial designations occur along the northern property boundary and further to the north, as well as to the southeast. The small parcel located at the northernmost Project site boundary currently contains a distribution center and is designated as Business Professional Office in the PVCCSP, and the parcels northeast of the Project site are designated as Residential in the PVCCSP.

1.3.2 Perris Valley Commerce Center Specific Plan

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

The PVCCSP EIR is a program EIR, and project-specific evaluations in later-tier environmental documents for individual development projects within the PVCC area were anticipated. The PVCCSP EIR analyzes the direct and indirect impacts resulting from implementation of the allowed development under the PVCCSP. Measures to mitigate, to the extent feasible, the significant adverse project and cumulative

impacts resulting from that development are identified in the PVCCSP EIR. In conjunction with certification of the PVCCSP EIR, the City also adopted a Mitigation Monitoring and Reporting Program. Additionally, the PVCCSP includes Standards and Guidelines to be applied to future development projects within the Specific Plan area. The City 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 to be implemented in a timely manner.

1.4 Project Description

The proposed Project involves City approval of a Specific Plan Amendment, Tentative Parcel Map, Development Plan Reviews, and Conditional Use Permits, to allow the construction and operation of a self-storage facility, two sit-down restaurants, six fast-food restaurants, two gas stations including convenience stores, and a car wash on 20.28 total acres. In total, the Project involves the development and operation of 126,342 square feet of building area across these uses. Specifically, the Project would include 80,478 square feet of self-storage use across 22 buildings, two 6,000-square-foot sit-down restaurants, six drive-through fast-food restaurants comprised of 18,400-square-foot building area, 32 vehicle fueling positions across two gas stations including 10,039 square feet of convenience store uses, and a 5,425-square-foot automated car wash building.

1.4.1 Discretionary Actions and Approvals

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

- Certification of the Environmental Impact Report (SCH No. 2024080050) with the determination that the EIR has been prepared in compliance with the requirements of CEQA.
- Specific Plan Amendment (SPA 22-05280) to add self-storage as a conditionally permitted use within the PVCCSP Commercial land use designation.
- Tentative Parcel Map (TPM 22-05275 [38576]) to subdivide the existing two-parcel western site into four parcels.
- Tentative Parcel Map (TPM 24-05150 [38985]) to subdivide the existing one-parcel eastern site into four parcels.
- Development Plan Review (DPR 22-00028) to approve the proposed western site development plan.
- Development Plan Review (DPR 23-00021) to approve the proposed eastern site development plan.
- Conditional Use Permit (CUP 22-05295) to allow self-storage uses on the site, designated as Commercial under the PVCCSP.
- Conditional Use Permit (CUP 24-05141) to allow drive-through services on the site, designated as Commercial under the PVCCSP.

- Conditional Use Permit (CUP 24-05142) to allow drive-through service gas station uses with alcohol sales for off-site consumption on the site, designated as Commercial under the PVCCSP.

- Riverside County Airport Land Use Commission (ALUC) Consistency Review (Approved July 11, 2024).

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

- Review and approval of all off-site infrastructure plans, including street and utility improvements pursuant to the conditions of approval;

- Review of all plans, including grading and onsite utilities; and

- Approval of a Preliminary Water Quality Management Plan to mitigate post-construction runoff flows.

Approvals and permits that may be required by other agencies include:

- A National Pollutant Discharge Elimination System permit and a Construction Activity General Construction Permit from the Regional Water Quality Control Board to ensure that construction site drainage velocities are equal to or less than the pre-construction conditions and downstream water quality is not worsened;

- Permits to construct and/or permits to operate new stationary sources of equipment that emit or control air contaminants, such as heating, ventilation, and air conditioning units, cooking equipment, and fuel dispensers from the South Coast Air Quality Management District;

- Permits and associated approvals, as necessary for the installation of new utility infrastructure or connections to existing facilities.

1.5 Project Objectives

The applicant's goals for the proposed Project are to provide for the development of local serving commercial uses in the northern portion of the City and to increase employment opportunities while providing development compatible with the March ARB/IPA ALUCP. These goals align with various aspects of Connect SoCal – The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments (SCAG), primarily related to balancing job and housing opportunities in local areas to reduce long commutes from home to work. SCAG identifies the Inland Empire as a housing-rich area and coastal communities as job-rich areas and is striving in its policies to achieve more local balances of jobs and housing.

1.6 Project Alternatives

One of the most important aspects of the environmental review process is the identification and assessment of reasonable alternatives that have the potential for avoiding or minimizing the significant impacts of a proposed project. The State CEQA Guidelines (Section 15126(d)) emphasizes the selection of a reasonable range of technically feasible alternatives and adequate assessment of these alternatives to allow for a comparative analysis and consideration by decision-makers. The State CEQA Guidelines

state that the discussion of alternatives shall focus on alternatives capable of eliminating or reducing significant adverse environmental effects of a proposed project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. The Lead Agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. The range of alternatives required in an EIR is governed by a "rule of reason," which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.

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

As described in Sections 4.1, 4.2, and 7.0 of this EIR, the potentially significant impacts of the Project can be mitigated to a less than significant level except for operational and cumulative air quality and greenhouse gas emissions impacts.

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

- Alternative 1 – No Project

  Under the No Project Alternative, the proposed development of commercial uses including restaurant, gas station, car wash, and self-storage facilities would not occur. The Project site would remain in its current condition and remain vacant.

- Alternative 2 – Reduced Development Alternative

  This alternative would implement the uses proposed by the Project at a lower intensity, such that vehicle trips and their associated air quality and greenhouse gas emissions would be reduced. The Reduced Development Alternative considers development of commercial uses including 80,478 square feet of self-storage use across 22 buildings, two 6,000-square-foot sit-down restaurants, six drive-through fast-food restaurants comprised of 18,400-square-feet of building area, 20 vehicle fueling positions within one gas station including 5,000 square feet of convenience store uses, and a 5,425-square-foot automated car wash building. This scenario represents the removal of one gas station with 12 vehicle fueling positions and its associated convenience store as compared to the proposed Project. The Reduced Development Alternative retains the self-storage facility, drive-through restaurants, sit-down restaurant uses, and car wash as proposed by the Project.

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

The No Project Alternative has the least impact to the environment because it would not involve any construction or operational activities. While this alternative would avoid the significant effects of the Project, it would not be consistent with the City of Perris General Plan or PVCCSP, which anticipates

development of the Project site, resulting in a potentially significant land use impact. Additionally, none of the Project objectives would be met.

Therefore, the other environmentally superior alternative is the Reduced Development Alternative. This alternative would meet the Project objectives, although to a lesser degree than the proposed Project given the reduced commercial uses and employment opportunities that would be provided in the City. This alternative would reduce the significant air quality and greenhouse gas impacts of the Project, but not to a less than significant level. No increase in the severity of impacts would occur under the Reduced Density Alternative.

1.7 Areas of Controversy

State CEQA Guidelines Section 15123(b)(2) requires the Lead Agency to identify any known issues of controversy in the Executive Summary. In compliance with Section 15201 of the State CEQA Guidelines, the City has taken steps to provide opportunities for public participation in the initial environmental review process. As noted above, on August 2, 2024 the Project Notice of Preparation was filed at the Riverside County Clerk's Office. The City also distributed the Notice of Preparation to 54 federal, state, regional, and local government agencies and interested parties for a 30-day public review period to solicit comments and to inform agencies and the public of the Project. The Notice of Preparation comment period began on August 2, 2024 and ended on September 3, 2024. A Draft EIR public scoping meeting was held during a Planning Commission meeting on August 7, 2024. The City received three responses to the Notice of Preparation.

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

- Potential impacts to tribal cultural resources;
- Potential impacts to the City's storm drain facilities; and
- Potential air quality and health risk effects of the Project's gas station operations.

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

1.8 Summary of Significant Environmental Impacts

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

Table 1-1
DRAFT EIR IMPACT SUMMARY MATRIX

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Air Quality	Conflict with or obstruct implementation of the applicable air quality plan.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant without mitigation.
Air Quality	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	**MM Air 1:** To identify potential implementing development project-specific impacts resulting from construction activities, proposed development projects that are subject to CEQA shall have construction-related air quality impacts analyzed using the latest available URBan EMISsions (URBEMIS) model, or other analytical method determined in conjunction with the South Coast Air Quality Management District (AQMD). The results of the construction-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate South Coast AQMD's Localized Significance Threshold (LST) analysis or other appropriate analyses as determined in conjunction with South Coast AQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.	Significant and unavoidable.
		MM Air 2: Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and offsite, 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.	

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Air Quality		**MM Air 3:** To reduce fugitive dust emissions, the development of each individual implementing development project shall comply with South Coast AQMD Rule 403. The developer of each implementing project shall provide the City of Perris with the South Coast AQMD-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 for20 days or more, assuming no rain); • keeping disturbed/loose soil moist at all times; requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered; installation of wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip; • posting and enforcement of traffic speed limits of 15 miles per hour (mph) or less on all unpaved potions of the project sites; • suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 mph; • appointment of a construction relations officer to act as a community liaison concerning onsite construction activity including resolution of issues related toPM10 generation; • sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of South Coast AQMD Rule1186 and 1186.1 certified street sweepers or roadway washing trucks when sweeping streets to remove visible soil materials; and replacement of ground cover in disturbed areas as quickly as possible.	
		MM Air 4: Building and grading permits shall include a restriction that limits idling of construction equipment on site to no more than five minutes.	

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Air Quality		**MM Air 5:** Electricity from power poles shall be used instead of temporary diesel or gasoline powered generators to reduce the associated emissions. Approval will be required by the City of Perris' Building Division prior to issuance of grading permits.	
		MM Air 6: The developer of each implementing development project shall require, by contract specifications, the use of alternative fueled offroad 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 (South Coast AQMD Rule 2449) and/or meets or exceeds Tier 3 standards with available CARB verified or USEPA certified technologies. Diesel equipment shall use water emulsified diesel fuel such as PuriNOX unless it is unavailable in Riverside County at the time of project construction activities. Contract specifications shall be included in project construction documents, which shall be reviewed by the City of Perris' Building Division prior to issuance of a grading permit.	
		MM Air 7: During construction, ozone (O3) precursor emissions from mobile construction equipment shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturers' specifications to the satisfaction of the City of Perris' Building Division. Equipment maintenance records and equipment design specification data sheets shall be kept onsite 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.	

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Air Quality		**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 South Coast AQMD's Rule 1113. Construction specifications shall be included in building specifications that assure these requirements are implemented. The specifications for each implementing development project shall be reviewed by the City of Perris' Building Division for compliance with this mitigation measure prior to issuance of a building permit for that project.	
		MM Air 10: To identify potential implementing development project-specific impacts resulting from operational activities, proposed development projects that are subject to CEQA shall have long-term operational-related air quality impacts analyzed using the latest available URBEMIS model, or other analytical method determined by the City of Perris as Lead Agency in conjunction with the South Coast AQMD. The results of the operational-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate South Coast AQMD's LST analysis, Carbon Monoxide (CO) Hot Spot analysis, or other appropriate analyses as determined by the City of Perris in conjunction with South Coast AQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.	
		MM Air 14: Each implementing development project shall designate parking spaces for high occupancy vehicles and provide larger parking spaces to accommodate vans used for ride sharing. Proof of compliance would be required prior to the issuance of occupancy permits.	

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
		MM Air 18: Prior to the approval of each implementing development project, the Riverside Transit Agency (RTA) shall be contacted to determine if the RTA has plans for the future provision of bus routing within any street that is adjacent to the implementing development project that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that will serve the implementing development project, road improvements adjacent to the Project sites shall be designed to accommodate future bus turnouts at locations established through consultation with the RTA. RTA shall be responsible for the construction and maintenance of the bus stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalks and curb and gutter at bus stops and the use of Americans with Disabilities Act (ADA)-compliant paths to the major building entrances in the project.	
		MM Air 19: In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g., electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the Project sites These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris' Building Division) prior to conveyance of applicable streets.	
Air Quality		**MM Air 20:** Each implementing development project shall be encouraged to implement, at a minimum, an increase in each building's energy efficiency 15 percent beyond Title 24, and reduce indoor water use by 25 percent. All reductions would be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.	
	Expose sensitive receptors to substantial pollutant concentration.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant without mitigation.
	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant without mitigation.

Impact Category	Impact	Applicable PVCCSP Mitigation Measures and Additional Project-level Mitigation Measures	Impact After Mitigation
Greenhouse Gas Emission	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	**MM Air 4-7, 14, 18-20**	Significant and unavoidable.
Greenhouse Gas Emissions	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant without mitigation.

1.9 References

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

Southern California Association of Governments (SCAG). 2020. The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. September. Available at: https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020. Accessed September 30, 2024.

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2.0 INTRODUCTION

2.1 Purpose of the EIR

This Draft Environmental Impact Report (EIR) has been prepared to evaluate the potential environmental impacts associated with the construction and operation of the proposed Perris Gateway Project (Project). The Project involves the construction and operation of a self-storage facility, two sit-down restaurants, six fast-food restaurants, two gas stations including convenience stores, and a car wash on a 20.28 acre site. The Project would also provide associated onsite parking, landscaping, and roadway and infrastructure improvements in conjunction with the proposed uses. The City of Perris (City) is the Lead Agency for the Project under the California Environmental Quality Act (CEQA) and is responsible for preparing the EIR. The determination that the City is the "Lead Agency" is made in accordance with Sections 15051 and 15367 of the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines), which define the lead agency as the public agency that has the principal responsibility for carrying out or approving a project.

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

- To satisfy the requirements of CEQA (California Public Resources Code, Sections 21000-21178) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Chapter 14, Sections 15000-15387).

- To inform the public, the local community, and responsible or interested public agencies of Project details, including the scope of the Project, the potential environmental effects of the Project, potential measures to mitigate those significant effects, and alternatives to the Project.

- To enable City decision-makers to consider environmental consequences when deciding whether to approve the Project.

- To serve as a source document for responsible agencies to issue permits and approvals, as required, for development of the Project.

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

This Draft EIR has been prepared utilizing information from City planning and environmental documents, technical studies prepared for the Project, and other publicly available data. As permitted under the State CEQA Guidelines (Section 15084[d–e]), this Draft EIR has been prepared by a consultant under the direction of City planning staff. However, the City has undertaken an independent review of this Draft

EIR by having City planning staff work with the consultant on the EIR and by employing a third-party consultant to independently review the EIR. Therefore, if certified by the City, the information included, and the conclusions reached in the EIR, will represent the City's independent judgment regarding the potential environmental impacts of the Project.

2.2 Type of EIR

The proposed Project site is located within the Perris Valley Commerce Center (PVCC) area of the City and is subject to the Perris Valley Commerce Center Specific Plan (PVCCSP), which was adopted by the City on January 10, 2012 (Ordinance No. 1284) and, as of the date that this Draft EIR was prepared, has been subsequently amended 14 times. The environmental impacts resulting from implementation of allowed development under the PVCCSP have been evaluated in the Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (PVCCSP EIR) (State Clearinghouse [SCH] No. 2009081086), which was certified by the City in January 2012. The PVCCSP EIR is a program EIR and was prepared in accordance with CEQA and the State CEQA Guidelines. Project-specific evaluation in a later-tier environmental document 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 later activity to permit discussion solely of new effects which had not been considered before". As such, the environmental analysis for the Project presented in this Draft EIR is based on, or "tiered" from, the analysis presented in the PVCCSP EIR, when applicable, and the PVCCSP EIR is incorporated by reference (refer to Section 2.6).

Section 15152 of the State CEQA Guidelines states, "Tiering refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on issues specific to the later project." CEQA and the State CEQA Guidelines encourage the use of tiered environmental documents to eliminate repetitive discussions of the same issues.

The PVCCSP EIR analyzes the direct and indirect impacts resulting from implementation of the allowed development under the PVCCSP. Section 15152(f) of the State CEQA Guidelines instructs that, when tiering, a later EIR or Negative Declaration shall be prepared when the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. Significant environmental effects are considered to have been "adequately addressed" if the lead agency determines that:

A. they have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or

B. they have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

Following review of the Project, which requires an amendment to the PVCCSP, and the analysis presented in the PVCCSP EIR, the City has determined that the Project is a "project" under CEQA that was not fully addressed in the PVCCSP EIR. Additional information regarding issues to be further evaluated in this Draft EIR is provided in Section 2.4, Scope of this EIR.

2.3 EIR Process

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

An Initial Study was prepared by the City to identify those aspects of the proposed Project that, either individually or cumulatively, may cause a significant adverse effect on the physical environment. The Initial Study determined 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 adequately addressed by mitigation measures as described on attached sheets. An EIR is required, but it must analyze only the effects that remain to be adequately mitigated. The Initial Study indicated that the Project EIR should focus its analysis on the two environmental subject areas as listed below in Subsection 2.4.3.

The City then prepared a Notice of Preparation of a Draft EIR, which it filed with the Riverside County Clerk's Office and posted on the State Clearinghouse website for a 30-day public review period, which began on August 2, 2024. The City received written comments on the scope of the EIR during those 30 days, which have been considered by the City in the preparation of this Draft EIR. The City also held a Draft EIR scoping meeting open to interested public agencies and members of the public during its regularly scheduled Planning Commission hearing on August 7, 2024. Comments received during the scoping meeting are detailed in Section 2.4.1 below.

The Project Notice of Preparation, Initial Study, and responses to the Notice of Preparation are included in Appendix A of this Draft EIR.

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

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

2.4 Scope of this EIR

2.4.1 Draft EIR Scoping Process

In compliance with Section 15201 of the State CEQA Guidelines, the City has taken steps to provide opportunities for public participation in the initial environmental review process. As noted above, on August 2, 2024, the Project Notice of Preparation was filed at the Riverside County Clerk's Office and posted on the State Clearinghouse website. The City also distributed the Notice of Preparation to 54 federal, state, regional, and local government agencies and interested parties for a 30-day public review period to inform agencies and the public of the Project and solicit comments on the scope of the EIR. The Notice of Preparation comment period began on August 2, 2024 and ended on September 3, 2024. A public scoping meeting was held during a regularly scheduled Planning Commission meeting on August 7, 2024. During the scoping meeting, the Project was described, potential environmental effects associated with Project implementation were identified, and agencies and the public were invited to comment on the scope of the EIR.

The City received three responses to the Notice of Preparation. Table 2-1, *Notice of Preparation Response Summary*, provides a summary of the Notice of Preparation responses and issues raised as well as where these issues are addressed in the EIR. The issues raised in these responses represent the areas of controversy and issues to be resolved. A copy of the Notice of Preparation, Initial Study, and responses received are included in Appendix A of this Draft EIR.

Table 2-1
NOTICE OF PREPARATION RESPONSE SUMMARY

Commenter	Date	Comment Summary	Where Addressed in Draft EIR
Public Agencies			
Native American Heritage Commission (NAHC)	August 15, 2024	The NAHC recommended tribal consultation with the California Native American tribes that are traditionally and culturally affiliated with the Project's geographic area and a cultural resource assessment to identify and avoid sensitive cultural resources.	Section 7.1.16
Riverside County Flood Control and Water Conservation District	August 29, 2024	The Riverside County Flood Control and Water Conservation District noted that the Project involves District proposed Master Drainage Plan facilities and is within the limits of the Perris Valley Drainage Plan for which drainage fees have been adopted. The District stated that the Project applicant shall enter into a cooperative agreement with the District for inspection, operation, and maintenance of the facilities; the applicant will also be required to pay the appropriate fees and obtain an encroachment permit for any construction related activities occurring within District facilities.	Section 7.1.8

Commenter	Date	Comment Summary	Where Addressed in Draft EIR
South Coast Air Quality Management District (AQMD)	September 3, 2024	The South Coast AQMD recommended that the Project include a health risk assessment and mitigation measures, as necessary, to reduce adverse air quality and greenhouse gas emissions impacts.	Section 4.1 and Section 4.2

As noted previously, a Draft EIR public scoping meeting was conducted on August 7, 2024 during the regularly scheduled Perris Planning Commission hearing at the Perris City Hall City Council Chambers. City staff described the Project to the Planning Commission and members of the public and provided a conceptual site plan and architectural elevations for the Project. Following a brief explanation of the environmental review process by the EIR consultant, comments from the Planning Commissioners were solicited. The Planning Commissioners raised comments regarding aesthetics, traffic delays and safety, and air quality and noise impacts on nearby sensitive receptors. Potential impacts related to aesthetics, traffic, and noise are addressed in Section 7.0, *Effects Found Not to be Significant*. Air quality impacts are discussed in Section 4.1, *Air Quality*.

2.4.2 Effects Found Not to be Significant

As identified in the Initial Study circulated with the Notice of Preparation and included in Appendix A of this Draft EIR, the City concluded that the Project would have no impact, a less than significant impact, or a less than significant impact with mitigation related to aesthetics, agriculture and forestry resources, biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire. Therefore, no further detailed analysis of these topics is required in the Draft EIR. Refer to Section 7.0 of this Draft EIR for a discussion of these issue areas.

2.4.3 Potentially Significant Impacts of the Proposed Project

The Initial Study, Notice of Preparation, and comments received on the Notice of Preparation were used to establish the scope of the issues addressed in this Draft EIR. The City identified that additional Project-level analysis was required to evaluate potential impacts associated with the implementation of the Project for air quality and greenhouse gas emissions, which is provided in Section 4.0, *Environmental Analysis*, of this Draft EIR.

2.5 EIR Format and Content

This Draft EIR contains the information required to be included in an EIR as specified by CEQA and the State CEQA Guidelines (California Public Resources Code, Section 21000 et. seq. and CCR, Title 14, Chapter 5). State CEQA Guidelines Sections 15122-15131 outline the required content of an EIR. In summary, the content and format of this EIR is as follows:

- **Section 1.0, Executive Summary**, provides an overview of the Draft EIR document and CEQA process. The Project, including its objectives, is summarized, and the location and regional setting of the Project site is documented. In addition, the Executive Summary discloses the potential areas of controversy related to the Project and identifies the potential alternatives to the proposed Project as required by CEQA. Finally, the Executive Summary provides a summary

of the Project's impacts, mitigation measures, and conclusions, in a table that will form the basis of the Project's Mitigation Monitoring and Reporting Program.

- **Section 2.0, Introduction**, provides introductory information about the CEQA process and the responsibilities of the City, serving as the Lead Agency for this EIR; a description of the Initial Study/Notice of Preparation and scoping process; and an overview of the Draft EIR format.

- **Section 3.0, Project Description**, serves as the EIR's Project Description for the purposes of CEQA. This section provides a detailed description of the Project, including its purpose, main objectives, construction characteristics, and operational characteristics expected over the Project's lifetime, should development occur on the property. The section also describes the environmental setting, including descriptions of the Project site's physical conditions and surrounding context used as the baseline for analysis in this Draft EIR. In addition, the discretionary actions required of the City and other government agencies to implement the Project are discussed.

- **Section 4.0, Environmental Analysis**, provides an analysis of potential direct, indirect, and cumulative impacts that may occur with implementation of the proposed Project. The analyses in Section 4.0 are based primarily on the technical reports that are appended to this Draft EIR. Information is also drawn from other sources of analytical materials that directly or indirectly relate to the proposed Project and are cited in each individual section. A conclusion concerning significance is reached for each discussion and mitigation measures are presented as warranted. If mitigation measures are not available or feasible to reduce an identified impact to below a level of significance, the environmental effect is identified as a significant and unavoidable adverse impact, for which a Statement of Overriding Considerations would need to be adopted by the City pursuant to State CEQA Guidelines Section 15093.

- **Section 5.0, Project Alternatives**, describes and evaluates alternatives to the proposed Project that could reduce or avoid the Project's significant environmental effects. CEQA does not require an EIR to consider every conceivable alternative to the Project but rather to consider a reasonable range of alternatives that foster informed decision making and public participation. Two alternatives, including the CEQA-required No Project Alternative, are evaluated in detail in Section 5.0.

- **Section 6.0, Other CEQA Considerations**, includes specific topics that are required by CEQA and not covered elsewhere in this Draft EIR. These include a summary of the Project's significant and unavoidable environmental effects; a discussion of the significant and irreversible environmental changes that would occur should the Project be implemented; and potential growth-inducing aspects of the proposed Project.

- **Section 7.0, Effects Found Not to be Significant**, includes a discussion of the potential environmental effects that were found not to be significant during the Notice of Preparation public review process and that, therefore, do not require a detailed evaluation in this Draft EIR.

- **Section 8.0, List of EIR Preparers**, lists the persons who authored or participated in preparing this Draft EIR.

2.6 Incorporation by Reference

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

- Perris Comprehensive General Plan 2030, City of Perris, originally approved April 26, 2005, and subsequently amended.
- City of Perris General Plan 2030 Environmental Impact Report (SCH No. 2004031135), certified April 26, 2005.
- Perris Municipal Code for the City of Perris, adopted 1972 and amended through November 28, 2023.
- Perris Valley Commerce Center Specific Plan adopted January 10, 2012, and subsequently amended.
- Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (SCH No. 2009081086), certified January 10, 2012.
- Optimus Logistics Center Draft Environmental Impact Report (SCH No. 2012111003), certified January 12, 2016.

These documents are available for review at the address provided in Section 2.7, below.

2.7 Public Review of the Draft EIR

This Draft EIR is being circulated for review and comment to the public and other interested parties, agencies, and organizations. The comment period will begin on January 31, 2025 and end on March 17, 2025. During the review period, the Draft EIR will be available for review at the Planning Division building at the address presented below. The Draft EIR will also be available on the City's website at https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review.

Written comments on the Draft EIR should be addressed to:

Mathew Evans, Project Planner
City of Perris Planning Division
135 North D Street
Perris, California 92570
mevans@cityofperris.org

2.8 References

Albert A. Webb Associates. 2011. Perris Valley Commerce Center Specific Plan Final Environmental Impact Report SCH No. 2009081016. City of Perris. Available from: https://www.cityofperris.org/home/showpublisheddocument/2645/637455522835370000.

3.0 PROJECT DESCRIPTION

3.1 Introduction

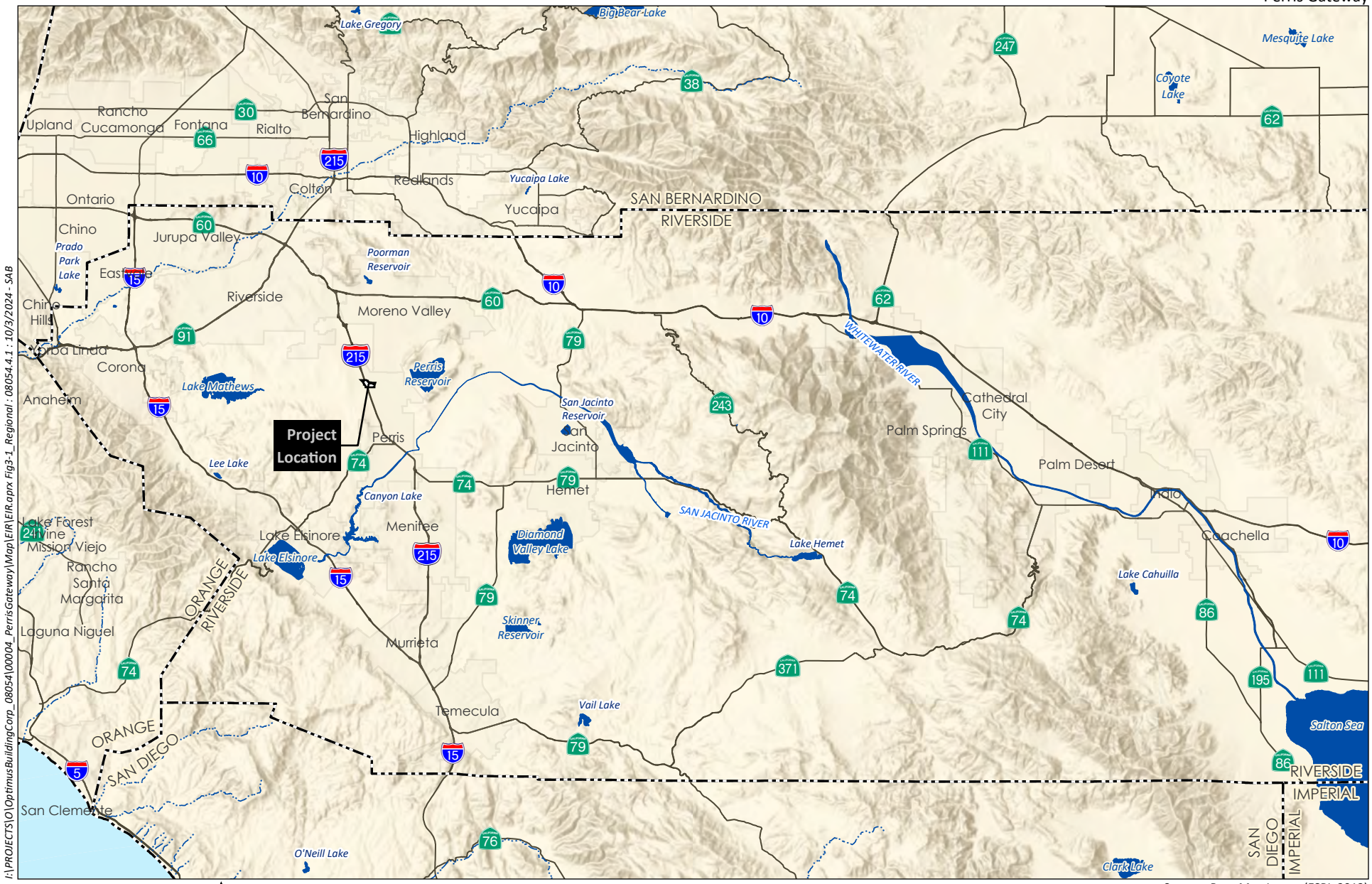
This section provides a brief background for the Project, followed by a detailed description of the Project and its environmental setting, pursuant to Sections 15124 and 15125, respectively, of the State CEQA Guidelines. This includes a description of the Project location, geographic setting, environmental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

3.2 Project Background

The proposed Project site is within the PVCC area of the City and is therefore subject to the PVCCSP. The PVCCSP land uses allow for the development of approximately 3,500 acres of land with industrial, business/professional office, commercial, residential, and public uses. An EIR was prepared for the Optimus Logistics Center and certified by the City of Perris City Council on January 12, 2016. The Project site was included in the study area of the Optimus Logistics Center EIR; however, no specific development plan was proposed for the Project site. Rather, speculative shopping center uses including 220,520 square feet of development were analyzed as a potential use for two of the Project site parcels for the Optimus Logistics Center EIR. No development was proposed or analyzed on the third, westernmost parcel of the Project site since this area was reserved for a future Ramona Expressway on-ramp alignment for Alternative 9 of the Riverside County Transportation Commission's Mid-County Parkway project.

3.3 Project Location

The Project site (Assessor's Parcel Numbers 314-170-020, 314-170-023, and 314-180-024) is located within the western portion of the PVCC area and includes approximately 20 acres (20.28 acres) of vacant land. It is located adjacent to Interstate (I-) 215, approximately 6.5 miles south of State Route (SR) 60, and approximately one mile south of March Air Reserve Base/Inland Port Airport (March ARB/IPA). Figure 3-1, *Regional Location*, depicts the Project site in relation to the region. Figure 3-2, *Aerial Photograph*, depicts the existing developed and undeveloped conditions at and surrounding the Project site. As shown, the Project site is located north of Ramona Expressway, west of Webster Avenue, and east of I-215.

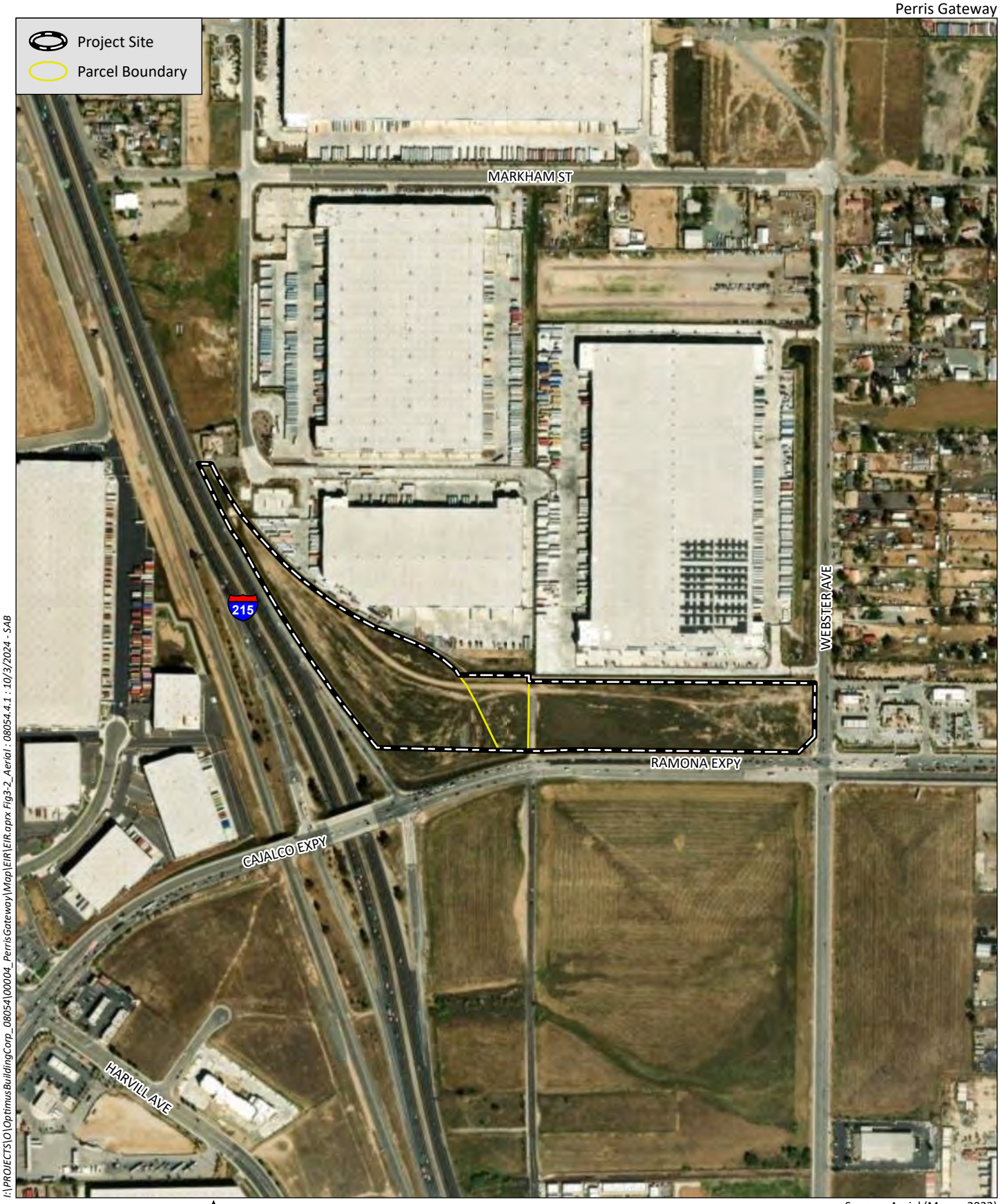


Source: Base Map Layers (ESRI, 2013)

HELIX Environmental Planning

Regional Location

Figure 3-1



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0 600 Feet

Source: Aerial (Maxar, 2022)

HELIX Environmental Planning

Aerial Photograph

Figure 3-2

3.4 Environmental Setting

The Project site is located within Planning Area 1: North Industrial as identified in the City of Perris General Plan Land Use Element. This area is generally made up of "industrial" land use designations and uses. While there are some residential uses in this area, the majority of land uses are non-residential. There are no schools or parks. This area is near March ARB/IPA, and future land uses could include air-cargo support and air-cargo dependent businesses. Noise-sensitive uses that would be disturbed by air cargo or military plane overflights, such as residential development, should be discouraged. Heavy truck traffic can be expected in this area, affecting future roadway design and maintenance.

The PVCCSP EIR provides a description of the environmental and regulatory setting for the entire PVCC area, including the Project site. Except for the termination of agricultural activities and the construction of development anticipated within the PVCC area, the physical setting description for the Project site and adjacent areas has not notably changed since the PVCCSP EIR was certified in 2012. Similarly, the Project setting described in the Optimus Logistics Center EIR for the Project site remains consistent with current conditions, as the Project site has not been developed. Industrial uses as analyzed in the Optimus Logistics Center EIR were developed north of the Project site in 2018.

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

The Project site can generally be characterized as disturbed vacant land that was previously used for agricultural purposes. The Project site is generally flat with an elevation between 1,480 and 1,500 feet above mean sea level. Stormwater runoff generally flows from northwest to southeast within the western two parcels and southwest to northeast on the eastern parcel. Runoff outfalls to a catch basin at the northeast corner of the Project site and flows into Line E of the Perris Valley Storm Drain System, which is owned and maintained by the Riverside County Flood Control and Water Conservation District and runs in an east-west direction along Ramona Expressway.

The land uses surrounding the Project site include a mix of undeveloped and developed areas. Surrounding land uses include the Optimus Logistics Center to the north, residential land uses to the northeast, commercial development to the east, currently undeveloped areas to the south, and I-215 to the west. The vacant parcels south of the Project site along Ramona Expressway are designated in the PVCCSP for commercial land uses, as described below.

The existing City of Perris General Plan land use designation and zoning for the Project site is PVCC SP - Perris Valley Commerce Center Specific Plan. The PVCCSP establishes the zoning for the properties within the PVCC area. As shown on Figure 3-3, *PVCCSP Land Use Designations*, the PVCCSP designation for the Project site is Commercial. Commercial land use designations are also identified immediately to the east and south of the Project site. Light Industrial designations occur along the northern property boundary and further to the north, as well as to the southeast. The small parcel located at the northernmost Project site boundary currently contains a distribution center and is designated as Business Professional Office in the PVCCSP, and the parcels northeast of the Project site are designated as Residential in the PVCCSP.

Perris Gateway

Project Site

Perris Valley Commerce Center Specific Plan Land Use Designations

- Perris Valley Commerce Center - Residential
- Perris Valley Commerce Center - Basin
- Perris Valley Commerce Center - Business Professional Office
- Perris Valley Commerce Center - Commercial
- Perris Valley Commerce Center - Light Industrial

MESSENIA LN
PERRY ST
PATTERSON AVE
PERRY ST
215
WEBSTER AVE
RAMONA EXPY
NEVADA AVE
MESSENIA LN
CAJALCO EXPY

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0 250 Feet

N

Source: Aerial (Maxar, 2022)

HELIX Environmental Planning

PVCCSP Land Use Designations

Figure 3-3

The Project site is located approximately one mile south of March ARB/IPA and is located within the March ARB/IPA Airport Influence Area Boundary. The PVCCSP includes an Airport Overlay Zone (AOZ) which defines specific land uses corresponding generally with the boundaries and provisions of the 2014 March ARB/IPA Airport Land Use Compatibility Plan (ALUCP) and airport influence area. The Project site is within Airport Compatibility Zone C1 (Primary Approach/Departure Zone). Development within airport compatibility zones is restricted by the basic compatibility criteria provided in Table MA-2 of the 2014 March ARB/IPA ALUCP which is consistent with the safety and noise standards contained within the 2018 Air Installations Compatible Use Zones (AICUZ) Study. Airport Compatibility Zone C1 is a primary approach/departure zone with limited residential land uses and prohibits noise sensitive land uses and other uses which would cause hazards to flight.

The Project site is not within or adjacent to a Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Conservation Area. It is not within an MSHCP Criteria Cell, Core, or Linkage Area. The Project site is also not in a survey area for mammals, amphibians, Criteria Area Plant Species Survey Area, or Narrow Endemic Plant Species Survey Area.

3.5 Project Objectives

The applicant's goals for the proposed Project are to provide for the development of local serving commercial uses in the northern portion of the City and to increase employment opportunities while providing development compatible with the March ARB/IPA ALUCP. Specifically, the Project would achieve its purpose and goals through the following objectives:

1. Develop and operate an attractive commercial project along Ramona Expressway that meets local demand for more social gathering places, services, and eateries in a currently underserved area of the PVCC area.

2. Provide additional job opportunities in a housing-rich area to improve the local jobs to housing balance.

3. Provide necessary infrastructure and utilities to adequately serve the proposed development.

4. Encourage land uses that will generate tax revenue for the City, including, but not limited to, increased sales tax, to support the City's ongoing municipal operations.

3.6 Project Components

The proposed Project involves City approval of a Specific Plan Amendment, Tentative Parcel Map, Development Plan Reviews, and Conditional Use Permits (CUPs), to allow the construction and operation of a self-storage facility, two sit-down restaurants, six fast-food restaurants, two gas stations including convenience stores, and a car wash. The components of the Project are further described below.

3.6.1 Specific Plan Amendment

It is the intent of the PVCCSP to facilitate development of the PVCC area in an orderly and consistent fashion that is coordinated with the provision of necessary infrastructure and public improvements. Land use categories in the PVCCSP include Industrial, Business/Professional Office, Commercial, Residential, and Public. Zoning categories in the PVCCSP include General Industrial, Light Industrial, Business/ Professional Office, Commercial, Residential, Multi-Family Residential, and Public. The majority of the PVCC area is designated for Light Industrial and General Industrial development and the PVCCSP identifies areas along Ramona Expressway at the east and west ends of the PVCC boundary, including the Project site, for Commercial development. The Land Use Plan section of the PVCCSP that would be amended by the proposed Specific Plan Amendment is described below. No other Specific Plan amendments are proposed.

Section 2.0 of the PVCCSP contains the Land Use Plan, and defines land use categories and zones throughout the PVCC area and details permitted, conditionally permitted, accessory, and prohibited uses for each zone. The PVCCSP designates the Project site as a Commercial land use and zone, which is defined as a zoning designation that provides for retail, professional office, and service-oriented business activities that serve the entire City, as well as the surrounding neighborhoods. The proposed amendment to the PVCCSP would add self-storage facilities to the list of permitted uses within the Commercial land use designation provided in Table 2.0-2 of the PVCCSP. The environmental analysis contained in this Draft EIR addresses the effects of the proposed self-storage facility within the Commercial land use area of the Project site and does not address impacts associated with speculative development of self-storage facilities on other sites with existing Commercial land use designations. However, the addition of self-storage uses to the Commercial land use designation would not increase the overall intensity of the Commercial land use designation because self-storage uses have a lower trip generation rate than other Commercial uses (Institute of Transportation Engineers 2021). As a result, the addition of self-storage uses would not result in inconsistencies with land use plans or conformance planning.

3.6.2 Tentative Parcel Map

The Project applicant is requesting approval of a Tentative Parcel Map to re-subdivide the existing three-parcel Project site into eight parcels. As shown in Figures 3-4a and 3-4b, *Tentative Parcel Map*, these parcels would range in size from 0.936 net acre to 6.847 net acres. The subdivision of the site into these separate parcels would provide for the separation of proposed land uses and future ownership changes.

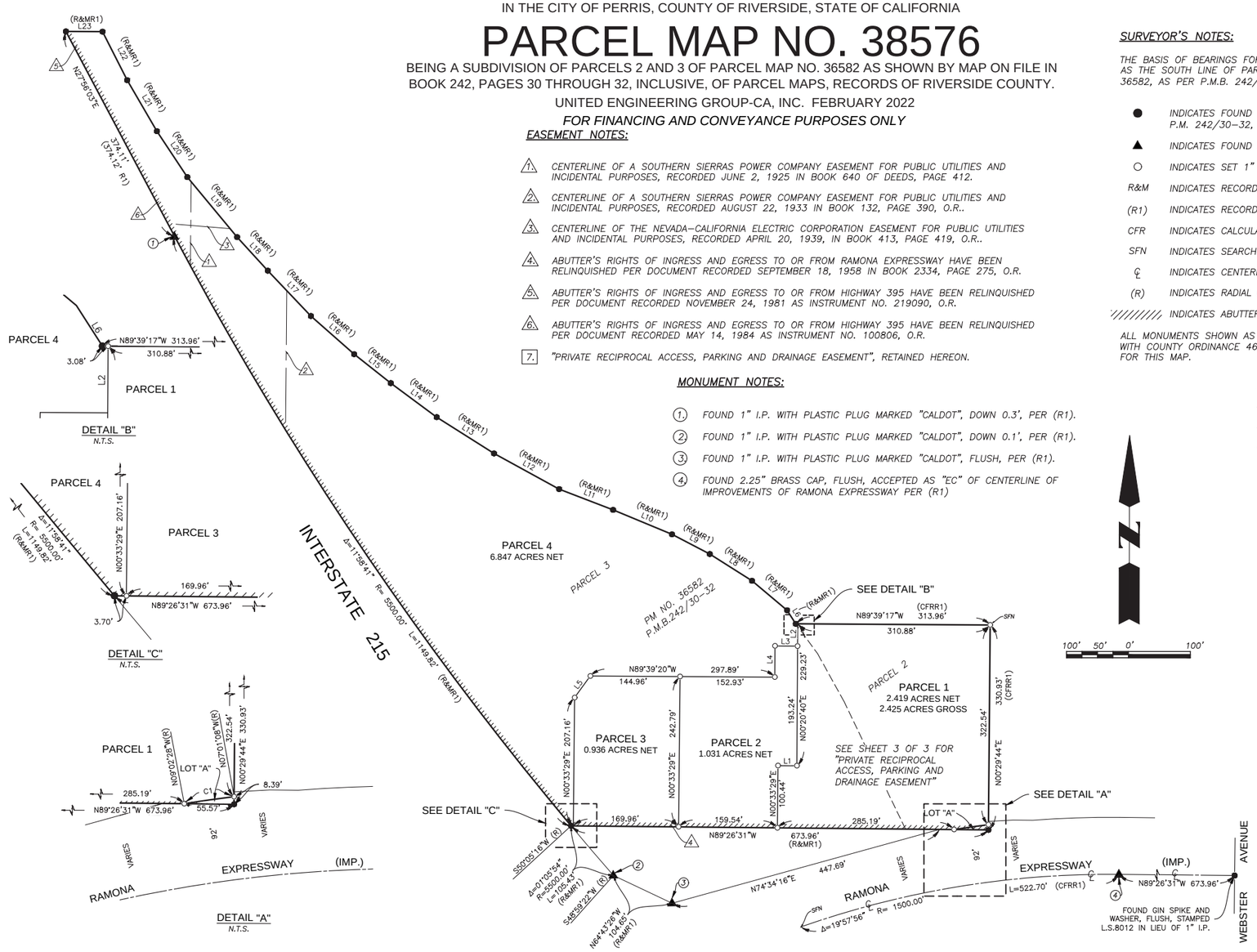
IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

PARCEL MAP NO. 38576

BEING A SUBDIVISION OF PARCELS 2 AND 3 OF PARCEL MAP NO. 36582 AS SHOWN BY MAP ON FILE IN BOOK 242, PAGES 30 THROUGH 32, INCLUSIVE, OF PARCEL MAPS, RECORDS OF RIVERSIDE COUNTY.

UNITED ENGINEERING GROUP-CA, INC. FEBRUARY 2022

FOR FINANCING AND CONVEYANCE PURPOSES ONLY



EASEMENT NOTES:

1. *CENTERLINE OF A SOUTHERN SIERRAS POWER COMPANY EASEMENT FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSES, RECORDED JUNE 2, 1925 IN BOOK 640 OF DEEDS, PAGE 412.*
2. *CENTERLINE OF A SOUTHERN SIERRAS POWER COMPANY EASEMENT FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSES, RECORDED AUGUST 22, 1933 IN BOOK 132, PAGE 390, O.R..*
3. *CENTERLINE OF THE NEVADA–CALIFORNIA ELECTRIC CORPORATION EASEMENT FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSES, RECORDED APRIL 20, 1939, IN BOOK 413, PAGE 419, O.R..*
4. *ABUTTER'S RIGHTS OF INGRESS AND EGRESS TO OR FROM RAMONA EXPRESSWAY HAVE BEEN RELINQUISHED PER DOCUMENT RECORDED SEPTEMBER 18, 1958 IN BOOK 2334, PAGE 275, O.R.*
5. *ABUTTER'S RIGHTS OF INGRESS AND EGRESS TO OR FROM HIGHWAY 395 HAVE BEEN RELINQUISHED PER DOCUMENT RECORDED NOVEMBER 24, 1981 AS INSTRUMENT NO. 219090, O.R.*
6. *ABUTTER'S RIGHTS OF INGRESS AND EGRESS TO OR FROM HIGHWAY 395 HAVE BEEN RELINQUISHED PER DOCUMENT RECORDED MAY 14, 1984 AS INSTRUMENT NO. 100806, O.R.*
7. *"PRIVATE RECIPROCAL ACCESS, PARKING AND DRAINAGE EASEMENT", RETAINED HEREON.*

MONUMENT NOTES:

1. *FOUND 1" I.P. WITH PLASTIC PLUG MARKED "CALDOT", DOWN 0.3', PER (R1).*
2. *FOUND 1" I.P. WITH PLASTIC PLUG MARKED "CALDOT", DOWN 0.1', PER (R1).*
3. *FOUND 1" I.P. WITH PLASTIC PLUG MARKED "CALDOT", FLUSH, PER (R1).*
4. *FOUND 2.25" BRASS CAP, FLUSH, ACCEPTED AS "EC" OF CENTERLINE OF IMPROVEMENTS OF RAMONA EXPRESSWAY PER (R1)*

SURVEYOR'S NOTES:

THE BASIS OF BEARINGS FOR THIS SURVEY IS N 89°26'31" W, SHOWN AS THE SOUTH LINE OF PARCELS 2 AND 3 ON PARCEL MAP NO. 36582, AS PER P.M.B. 242/30–32.

●	*INDICATES FOUND 1" I.P. WITH NAIL & TAG, L.S. 8012 PER P.M. 242/30–32, UNLESS NOTED OTHERWISE.*
▲	*INDICATES FOUND MONUMENT AS NOTED.*
○	*INDICATES SET 1" I.P., TAGGED L.S. 6974*
R&M	*INDICATES RECORD & MEASURED*
(R1)	*INDICATES RECORD DATA PER P.M.242/30–32.*
CFR	*INDICATES CALCULATED FROM RECORD*
SFN	*INDICATES SEARCHED, FOUND NOTHING*
℄	*INDICATES CENTERLINE*
(R)	*INDICATES RADIAL BEARING*
//////////	*INDICATES ABUTTER'S RIGHTS RELINQUISHED*

ALL MONUMENTS SHOWN AS "SET" SHALL BE SET IN ACCORDANCE WITH COUNTY ORDINANCE 461.10 AND THE MONUMENT AGREEMENT FOR THIS MAP.

CURVE TABLE				
CURVE #	DELTA	RADIUS	LENGHT	TANGENT
C1	02°01'20"	1592.00'	56.19'	28.10'

LINE TABLE		
LINE #	LENGTH	BEARING
L1	30.37'	N89°39'20"W
L2	35.99'	N00°20'40"E
L3	36.45'	N89°39'20"W
L4	50.29'	N00°20'40"E
L5	43.09'	N36°01'25"E
L6	26.01'	N32°38'51"W
L7	73.98'	N49°57'26"W
L8	80.70'	N57°37'43"W
L9	68.90'	N62°30'04"W
L10	102.87'	N67°26'31"W
L11	93.53'	N68°57'39"W
L12	119.79'	N61°15'53"W
L13	109.51'	N57°38'44"W
L14	92.36'	N53°28'24"W
L15	75.37'	N51°39'44"W
L16	93.15'	N48°36'22"W
L17	100.92'	N43°33'34"W
L18	73.44'	N42°24'15"W
L19	125.95'	N39°39'38"W
L20	88.95'	N33°36'49"W
L21	95.38'	N30°12'04"W
L22	87.81'	N26°52'30"W
L23	59.24'	N89°35'56"W

Source: Optimus Building Corp, 2024

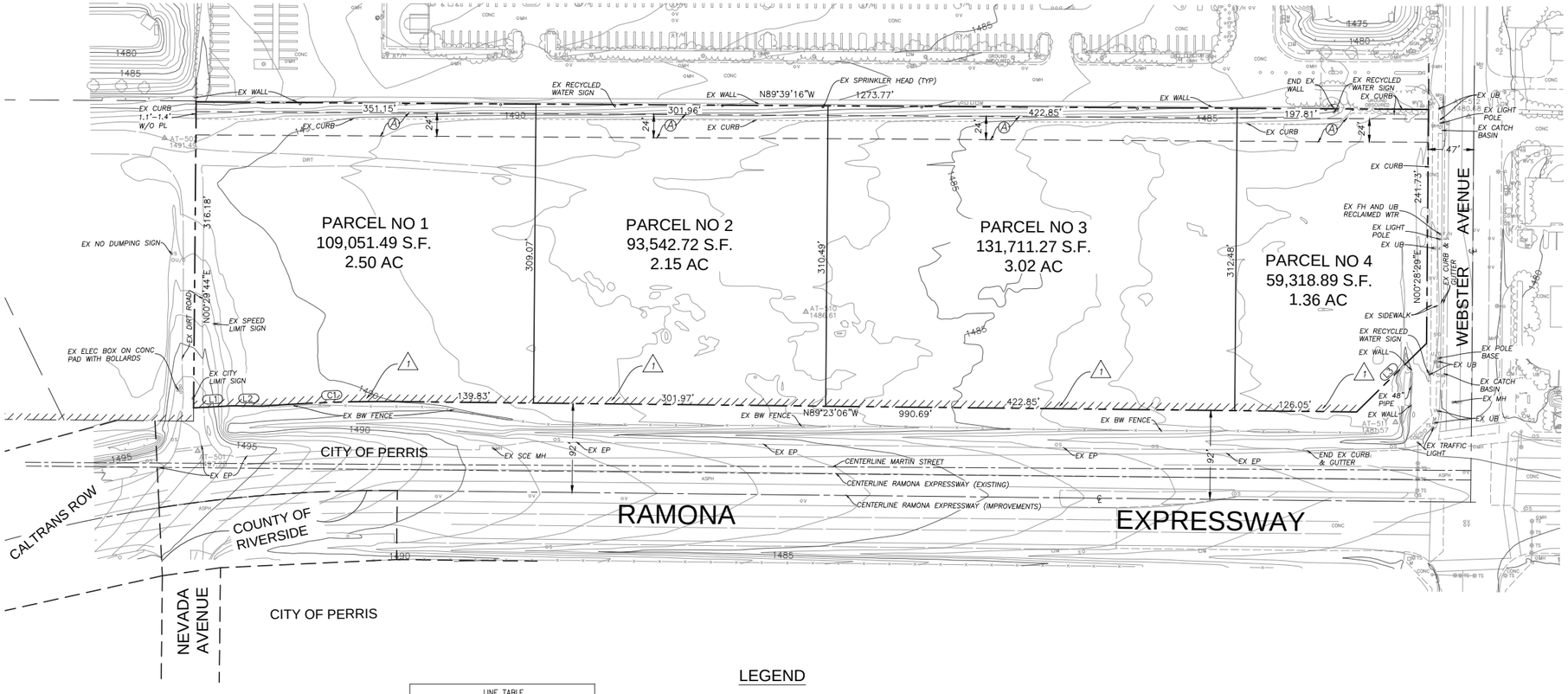
TENTATAVE PARCEL MAP NO. 38985

IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA.

UNITED ENGINEERING GROUP CA., INC APRIL 2024

FOR FINANCE AND CONVEYANCE PURPOSES ONLY

A FUTURE SUBDIVISION MAP, OR LAND USE ENTITLEMENT OR PERMIT IS NECESSSARY TO DEVELOP THIS PROPERTY. THIS MAP DOES NOT REMOVE ANY CONDITIONS OF APPROVAL FOR SEPARATE LAND USE ENTITLEMENTS OR TENTATIVE MAPS OR USE PERMITS APPROVED FOR THIS LAND.



LINE TABLE		
LINE #	LENGTH	BEARING
L1	39.71'	N86°54'01"E
L2	31.91'	N89°26'31"W
L3	101.23'	N45°32'41"E

CURVE TABLE			
CURVE #	RADIUS	LENGTH	DELTA
C1	1592.00'	140.15'	5°02'38"

BENCHMARK:

NGS DATA POINT
DESIGNATION–432;PID–DX5439
3 ½" ALUMINUM DISC STAMPED "BM 432"
SW COR PERRIS BLVD AND RIDER ST, BASE OF STEEL SIGNAL LIGHT, 3.5' X 2.7' CONC BASE ON EAST SIDE SET FLUSH
ELEV = 1455.11 (NAVD88)

LEGEND

CL	CHAIN LINK
ROW	RIGHT–OF–WAY
PP	POWER POLE
BW	BARBED WIRE
EP	EDGE OF ASPHALT PAVEMENT
GW	GUY WIRE
UB	UTILITY BOX
MH	MANHOLE
V	VALVE
U/O	UNIDENTIFIED OBJECT
S	SIGN
M	METER
TS	TRAFFIC SIGNAL
CONC	CONCRETE
ASPH	ASPHALT
AB	ASPHALT BERM
F/H	FIRE HYDRANT
CF	CURB FACE
TSB	TRAFFIC SIGNAL BOX
TSP	TRAFFIC SIGNAL POLE
— 2334 —	INDICATES CONTOUR ELEVATION
– – – –	PROJECT BOUNDARY
//////////	INDICATES ABUTTER'S RIGHTS RELINQUISHED

SURROUNDING LAND USE

NORTH:	PERRIS VALLEY COMMERCE CENTER SP (LIGHT INDUSTRIAL)
SOUTH:	PERRIS VALLEY COMMERCE CENTER SP (COMMERCIAL)
EAST:	PERRIS VALLEY COMMERCE CENTER SP (COMMERCIAL)
WEST:	PERRIS VALLEY COMMERCE CENTER SP (COMMERCIAL)

EXISTING & PROPOSED LAND USE:

PERRIS VALLEY COMMERCE CENTER SP

PARCEL #	EXIST LAND USE	PROPOSED LAND USE
1	COMMERCIAL	COMMERCIAL
2	COMMERCIAL	COMMERCIAL
3	COMMERCIAL	COMMERCIAL
4	COMMERCIAL	COMMERCIAL

I:\PROJECTS\O\OptimusBuildingCorp_08054\00004_PerrisGateway\Map\EIR\Fig3-4b_ParcelMap.indd 08054.4.1 5/13/2024 - SAB

Source: United Engineering Group, 2024

3.6.3 Conditional Use Permits

The Project applicant proposes the development and operation of a self-storage facility, six fast-foot restaurants, including drive-through services, and two gas stations with a total of 32 fueling stations and associated convenience stores with alcohol sales. With approval of the proposed Specific Plan Amendment, the proposed self-storage uses would be conditionally allowed within the Commercial land use designation. Drive-through restaurant and fueling land uses are allowed within the Commercial land use designation but also require approval of a CUP prior to operation. Therefore, the Project requires approval of three CUPs; one for the operation of self-storage uses, one for drive-through services, and one for gas station uses including convenience stores with alcohol sales.

3.6.4 Development Plan Review

The proposed Project involves the development of a commercial center including a self-storage facility, two sit-down restaurants, six fast-food restaurants, two gas stations including convenience stores, and a car wash, along the northern side of Ramona Expressway. Figure 3-5, *Site Plan*, shows the proposed development. In total, the Project involves the development and operation of 126,342 square feet of building area across these uses. Specifically, the Project would include 80,478 square feet of self-storage use across 22 buildings, two 6,000-square-foot sit-down restaurants, six drive-through fast-food restaurants comprised of 18,400-square-foot building area, 32 vehicle fueling positions across two gas stations including 10,039 square feet of convenience store uses, and a 5,425-square-foot automated car wash building.

The two western parcels are separately owned from the easternmost parcel and were submitted for separate Development Plan Review. The two western parcels are referred to as the “western site” and the eastern parcel encompasses the “eastern site”. These identifiers for the ownership differences within the Project site provide differentiation for the purposes of the Development Plan Review by the City. Unless otherwise specified, the descriptions and analysis in this Draft EIR apply to the entirety of the three parcels referred to as the Project site. Elements of the Project specific to the Development Plan for the western site and eastern site are noted where necessary.

In general, the architectural style of the proposed structures would be contemporary. The buildings would be constructed of plaster walls with accents of sustainable and natural materials. The exterior color palette would be comprised of various neutral shades, including whites, tans, greys, blues, and blacks, with occasional accent tones. The proposed buildings would be a maximum of 45 feet in height above the exterior finished grade. The architectural elements and landscaping would avoid monotony and repetition in building elevations and would minimize glare. Rooftop equipment would be screened and not visible from the street. Figures 3-6a through 3-6d, *Commercial Building Elevations*, provide representative elevations of the style of the proposed commercial buildings for the restaurant, convenience store, and car wash uses. Figure 3-7, *Self-Storage Building Elevations*, shows the proposed style of the self-storage buildings, and Figure 3-8, *Freeway Line-of-Sight to Self-Storage*, shows the line-of-sight from I-215 to the self-storage facility.

Perris Gateway

Project Site
Plan Lines

Self-storage Facility
Gas Station
Sit Down Restaurant
Sit Down Restaurant
Car Wash
Gas Station/Convenience Store
Fast-Food Restaurant
Fast-Food Restaurant
Fast-Food Restaurant
Fast-Food Restaurant
Fast-Food Restaurant
Fast-Food Restaurant
215
RAMONA EXPY
NEVADA AVE
WEBSTER AVE

I:\PROJECTS\OI\OptimusBuildingCorp_08054\00004_PerrisGateway\Map\EIR\EIR.aprx Fig3-5_SitePlan : 08054.4.1 : 10/3/2024 - SAB

0 200 Feet

Source: Bartholomew Architecture & SMS Architects 2024

HELIX Environmental Planning

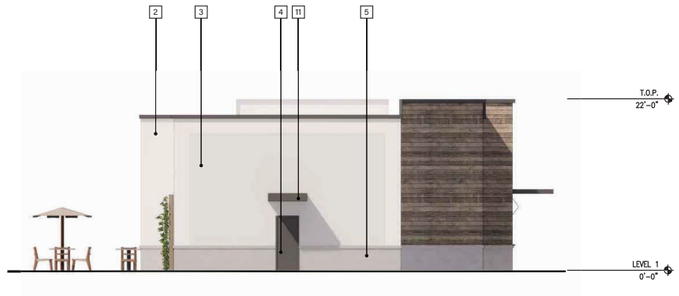
Site Plan

Figure 3-5

A - NORTH ELEVATION

B - EAST ELEVATION

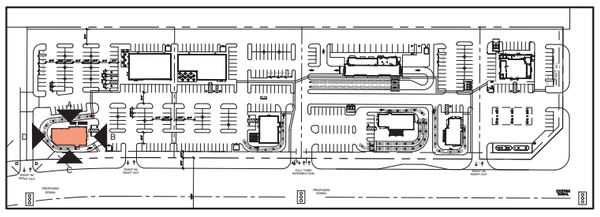
C - SOUTH ELEVATION



D - WEST ELEVATION

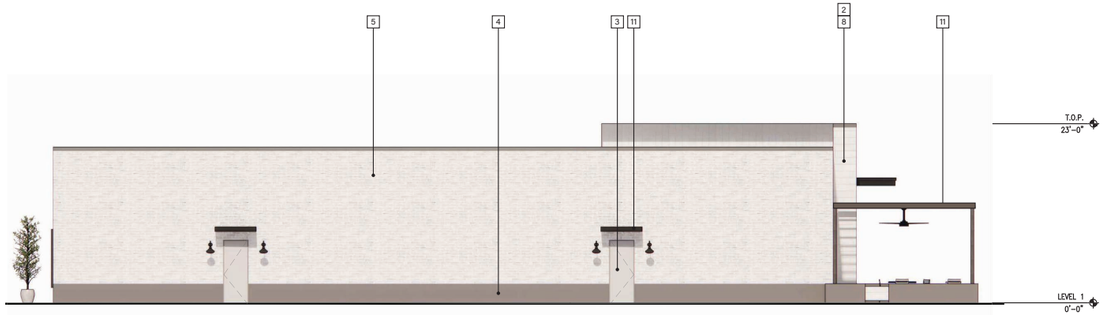
COLORS AND MATERIALS

1	METAL ROOF	WESTERN STATES METAL CHARCOAL GRAY
2	PAINT	SHERWIN WILLIAMS SW 7006 EXTRA WHITE
3	PAINT	SHERWIN WILLIAMS SW6197 ALOOF GRAY
4	PAINT	SHERWIN WILLIAMS SW7974 PEPPERCORN
5	STONE VENEER	ELDORADO STONE LONGITUDE24- SILENT GREY
6	STONE VENEER	ELDORADO STONE RIVER ROCK-RIO GRANDE
7	WOOD	WOOD NATURAL STAIN - DARK
8	WOOD	WOOD NATURAL STAIN - LIGHT
9	ZINC	PURE FREEFORM CRYSTAL FACE ZINC #CA003
10	STOREFRONT	ANODIZED ALUMINUM DARK BRONZE
11	METAL AWNING	SHERWIN WILLIAMS SW7974 PEPPERCORN
12	FABRIC CANOPY	SUNBRELLA BLACK
13	FABRIC CANOPY	SUNBRELLA BURGUNDY



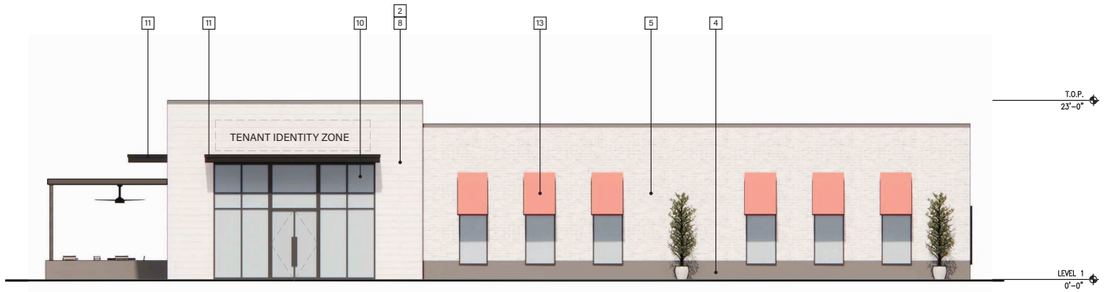
KEY PLAN

Source: SMS Architects, 2024

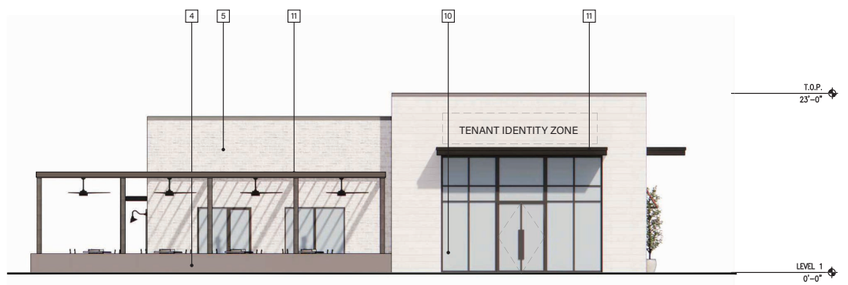


A - NORTH ELEVATION

B - EAST ELEVATION



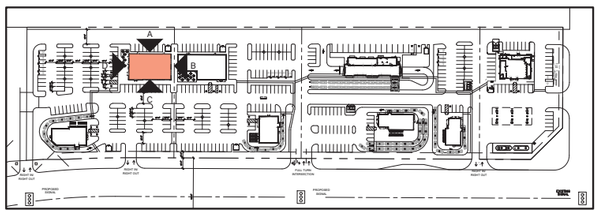
C - SOUTH ELEVATION



D - WEST ELEVATION

COLORS AND MATERIALS

1	METAL ROOF	WESTERN STATES METAL CHARCOAL GRAY
2	PAINT	SHERWIN WILLIAMS SW 7006 EXTRA WHITE
3	PAINT	SHERWIN WILLIAMS SW6197 ALOOF GRAY
4	PAINT	SHERWIN WILLIAMS SW7974 PEPPERCORN
5	STONE VENEER	ELDORADO STONE LONGITUDE24- SILENT GREY
6	STONE VENEER	ELDORADO STONE RIVER ROCK-RIO GRANDE
7	WOOD	WOOD NATURAL STAIN - DARK
8	WOOD	WOOD NATURAL STAIN - LIGHT
9	ZINC	PURE FREEFORM CRYSTAL FACE ZINC #CA003
10	STOREFRONT	ANODIZED ALUMINUM DARK BRONZE
11	METAL AWNING	SHERWIN WILLIAMS SW7974 PEPPERCORN
12	FABRIC CANOPY	SUNBRELLA BLACK
13	FABRIC CANOPY	SUNBRELLA BURGUNDY



KEY PLAN

Source: SMS Architects, 2024

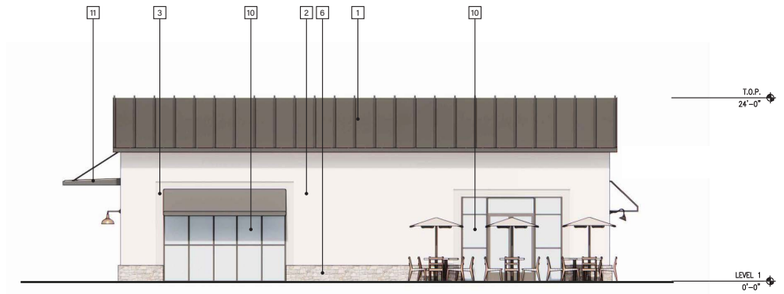
Commercial Building Elevations - Building 2

Figure 3-6b

A - NORTH ELEVATION

B - EAST ELEVATION

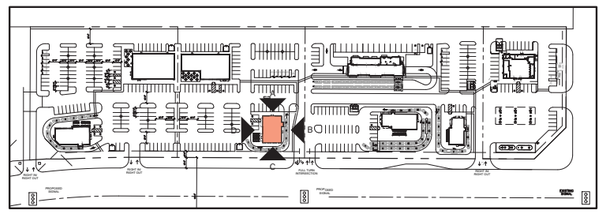
C - SOUTH ELEVATION



D - WEST ELEVATION

COLORS AND MATERIALS

1	METAL ROOF	WESTERN STATES METAL CHARCOAL GRAY
2	PAINT	SHERWIN WILLIAMS SW 7006 EXTRA WHITE
3	PAINT	SHERWIN WILLIAMS SW6197 ALOOF GRAY
4	PAINT	SHERWIN WILLIAMS SW7974 PEPPERCORN
5	STONE VENEER	ELDORADO STONE LONGITUDE24- SILENT GREY
6	STONE VENEER	ELDORADO STONE RIVER ROCK-RIO GRANDE
7	WOOD	WOOD NATURAL STAIN - DARK
8	WOOD	WOOD NATURAL STAIN - LIGHT
9	ZINC	PURE FREEFORM CRYSTAL FACE ZINC #CA003
10	STOREFRONT	ANODIZED ALUMINUM DARK BRONZE
11	METAL AWNING	SHERWIN WILLIAMS SW7974 PEPPERCORN
12	FABRIC CANOPY	SUNBRELLA BLACK
13	FABRIC CANOPY	SUNBRELLA BURGUNDY



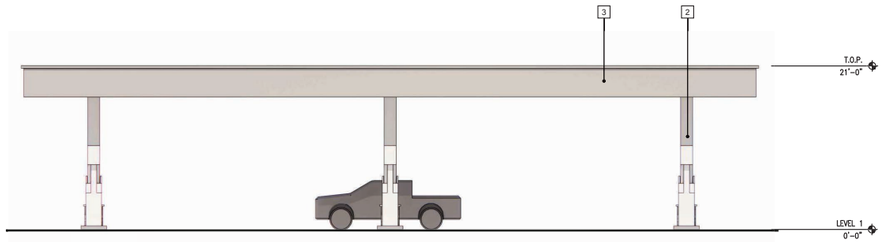
KEY PLAN

Source: SMS Architects, 2024

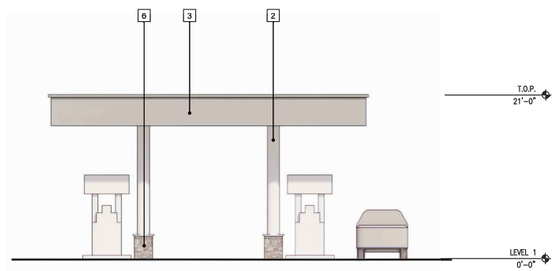
HELIX Environmental Planning

Commercial Building Elevations - Building 4

Figure 3-6c



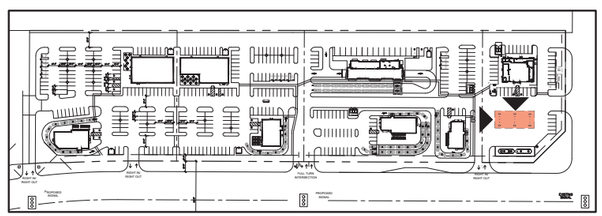
A - NORTH/SOUTH ELEVATION



B - EAST/WEST ELEVATION

COLORS AND MATERIALS

1	METAL ROOF	WESTERN STATES METAL CHARCOAL GRAY
2	PAINT	SHERWIN WILLIAMS SW 7006 EXTRA WHITE
3	PAINT	SHERWIN WILLIAMS SW6197 ALOOF GRAY
4	PAINT	SHERWIN WILLIAMS SW7974 PEPPERCORN
5	STONE VENEER	ELDORADO STONE LONGITUDE24- SILENT GREY
6	STONE VENEER	ELDORADO STONE RIVER ROCK-RIO GRANDE
7	WOOD	WOOD NATURAL STAIN - DARK
8	WOOD	WOOD NATURAL STAIN - LIGHT
9	ZINC	PURE FREEFORM CRYSTAL FACE ZINC #CA003
10	STOREFRONT	ANODIZED ALUMINUM DARK BRONZE
11	METAL AWNING	SHERWIN WILLIAMS SW7974 PEPPERCORN
12	FABRIC CANOPY	SUNBRELLA BLACK
13	FABRIC CANOPY	SUNBRELLA BURGUNDY



KEY PLAN

Source: SMS Architects, 2024

North Elevation

West Elevation

South Elevation

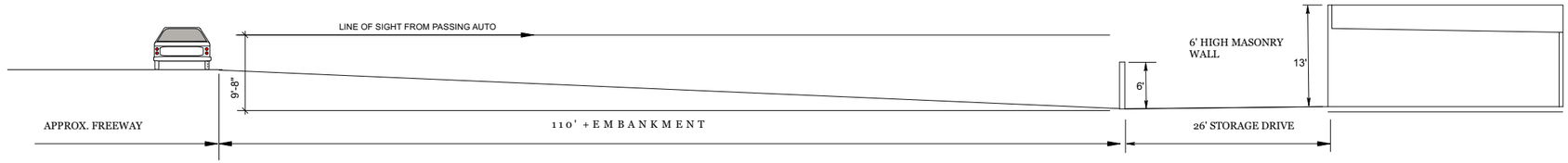
East Elevation

Source: HPA Architecture, 2024

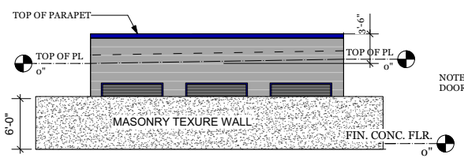
HELIX Environmental Planning

Self-Storage Building Elevations

Figure 3-7

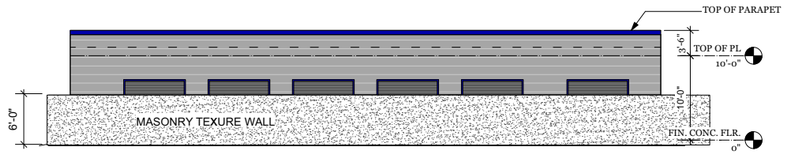


SECTION THRU FREEWAY - EMBANKMENT - SELF STORAGE FACADE
Scale: 1/8" = 1'-0"



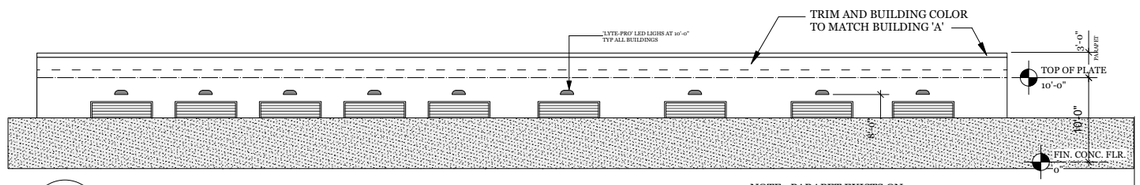
VIEW FROM FRWY 215-WEST VIEW FROM FWY

E-1 / A-10 WEST ELEVATION-BLDG D
Scale: 1/8" = 1'-0"



VIEW FROM FRWY 215-SOUTH VIEW FROM ENTRY RAMP

C-1 / A-10 SOUTH ELEVATION-BLDG D
Scale: 1/8" = 1'-0"



B-1 / A-9 SOUTH ELEV- BLDG C
Scale: 1/8" = 1'-0"

FREEWAY FACING BUILDING 'C' ELEVATION

I:\PROJECTS\O\OptimusBuildingCorp_08054\00004_PerrisGateway\Map\EIR\Fig3-8_FreewayLineofSight.indd 08054.4.15/13/2024 SAB

Source: Bartholomew Architecture, 2024

3.6.4.1 Access, Circulation, and Parking

Vehicular Circulation

The Project has been designed to comply with applicable PVCCSP standards and guidelines to minimize vehicular conflict and to provide shared access. Vehicular access to the Project site would be provided via four driveways along Ramona Expressway and two driveways along Webster Avenue. Two of the driveways along Ramona Expressway and one of the driveways along Webster Avenue would be right-in, right-out only and the remaining intersections would be full access driveways. Intersection geometry is described in further detail for each driveway below. The proposed Project would include roadway improvements for Ramona Expressway and Webster Avenue. In addition, a curb cut between Project Driveways 3 and 4 would be provided to accommodate a future bus stop planned by the Riverside Transit Agency (RTA) in accordance with PVCCSP EIR mitigation measures MM Air 18 and MM Trans 4. Off-site improvements that would be partially funded by the Project's required development impact fees would undergo separate environmental review as they are proposed for construction.

Ramona Expressway is an east-west oriented roadway located along the Project site's southern boundary. Ramona Expressway would be improved to its ultimate half-section pavement width as an Expressway (184-foot right-of-way) from Nevada Avenue to Webster Avenue, consistent with the City's Standards. The outermost westbound lane would be a trap right-turn lane onto Nevada Avenue until the receiving lane to the west of Nevada Avenue is constructed.

Webster Avenue is a north-south oriented roadway located along the Project site's eastern boundary. Webster Avenue is currently constructed at its ultimate half-section pavement width as a Secondary Arterial (94-foot right-of-way) consistent with the PVCCSP and the City of Perris General Plan Circulation Element. No expansion of Webster Avenue would occur, but improvements along the curb, gutter, and sidewalk would occur to accommodate Project driveways.

The proposed Project would include site access improvements from Ramona Expressway and Webster Avenue via six driveways, described in detail below.

Driveway 1 at Nevada Avenue and Ramona Expressway – Install a traffic signal and construct the intersection with the following geometrics:

- Northbound Avenue: Not Applicable (N/A)
- Southbound Approach (Project Driveway 1): One left turn lane and a shared through-right turn lane.
- Eastbound Approach: Left turn lane to be modified to provide a minimum of 300 feet of storage.
- Westbound Approach: Right-turn trap-lane until Ramona Expressway is constructed to its full-width, at which time a third through-lane could be constructed with the addition of a receiving lane along Ramona Expressway from Driveway 1.

Driveway 2 at Ramona Expressway – Install a stop control on the southbound approach and construct the intersection with the following geometrics:

- Northbound Approach: N/A
- Southbound Approach (Project Driveway 2): One right turn only lane

- Eastbound Approach: N/A
- Westbound Approach: Shared through-right turn lane

Driveway 3 at Ramona Expressway – Install a traffic signal aligned with future development south of Ramona Expressway and construct the intersection with the following geometrics:

- Northbound Approach: N/A
- Southbound Approach (Project Driveway 3): Left turn lane and shared through-right turn lane
- Eastbound Approach: Left turn lane with a minimum of 225 feet of storage
- Westbound Approach: Shared through-right turn lane

Driveway 4 at Ramona Expressway – Install a stop control on the southbound approach and construct the intersection with the following geometrics:

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

Driveway 5 at Webster Avenue – Install a stop control on the eastbound approach and construct the intersection with the following geometrics:

- Northbound Approach: Left turn lane with a minimum of 100 feet of storage
- Southbound Approach: N/A
- Eastbound Approach (Project Driveway 5): Shared left-through-right turn lane
- Westbound Approach: N/A

Driveway 6 at Webster Avenue – Install a stop control on the eastbound approach and construct the intersection with the following geometrics:

- Northbound Approach: N/A
- Southbound Approach: N/A
- Eastbound Approach (Project Driveway 6): One right turn only lane
- Westbound Approach: N/A

Where roadway improvements are required, roadways adjacent to the Project site, site access points, and site-adjacent intersections would be constructed to be consistent with the identified roadway classification and respective cross-sections in the PVCCSP or the City of Perris General Plan Circulation Element.

Non-Vehicular Circulation

The City's Circulation Element recommends a Class IV bike lane along the site's Ramona Expressway frontage, a Class II bike lane along the site's Webster Avenue frontage, and a Class I Bike path along Nevada Avenue south of the Project site. A meandering walkway would be installed along the Project's Ramona Expressway frontage. The buildings are proposed to be oriented so that entrances and entry access points are easily identified from a distance by pedestrians and/or vehicular traffic. Furthermore, crosswalks would be installed at intersections and within parking areas to ensure pedestrian safety.

Parking

The Project has been designed to comply with Sections 4.2.2.4 and 7.2.1.3 of the PVCCSP and Chapter 19.69 of the Perris Municipal Code related to parking requirements. Parking for customers of the commercial uses would be dispersed throughout the site between and surrounding the proposed businesses. The Project would include a total of 486 automobile parking stalls onsite, which would comply with the requirements outlined in the Perris Municipal Code. Automobile parking would consist of standard spaces, van accessible spaces, clean air/vanpool/electric vehicle spaces and accessible spaces. Pursuant to Section 5.106.5.3.1 of the 2022 California Green Building Standards Code (CALGreen), 98 of the automobile parking spaces (20 percent of total) would be capable of supporting electric vehicle charging infrastructure and 25 percent of those designated parking spaces (25 spaces) would provide infrastructure for the charging of electric vehicles at the time that the Project opens.

3.6.4.2 Landscape, Lighting, and Screen Walls

Landscape and Hardscape

The PVCCSP requires a minimum 10 percent landscape coverage for development in Commercial areas. The proposed Project includes landscape coverage of approximately 23 percent of the western site and approximately 10 percent of the eastern site. Landscape materials would include a variety of trees (e.g., for accent, screening, shade, and street), and shrubs (e.g., for accent, groundcover, screening). Proposed plant materials would have either low or moderate water needs and would be consistent with Section 6.1.3 of the PVCCSP, On-Site Plant Palette, or if approved by the City, plants that are consistent with California Friendly Landscape and that meet all minimum City of Perris Water Conservation Requirements, as defined in Chapter 19.70 of the Perris Municipal Code. The proposed landscaping plan would also be required to comply with the landscaping requirements of the current CALGreen Code at the time of permit issuance.

Lighting

Section 4.2.4 of the PVCCSP addresses lighting standards and guidelines, including general lighting, decorative lighting, and parking lot lighting standards. The Project would comply with applicable lighting standards and guidelines, and with lighting standards established by the City, the CALGreen Code, and Title 24 Energy Efficiency Standards. The Project would include lighting elements for safety and security of the proposed development. New sources of light would primarily include parking lot lighting, outdoor security lighting for the proposed buildings, and lighted signage. Lighting improvements on site would be shielded to avoid light pollution on neighboring properties and surrounding roadways, and to protect aircraft from glint and glare on final approach to March ARB/IPA.

Screen Walls

A six-foot-high masonry wall would be constructed along the western edge of the Project site adjacent to I-215. An existing screen wall along the northern edge of the Project site provides separation of the Project site and adjacent warehouse uses for privacy, noise control, and security. No alterations to this wall would occur as part of the proposed Project.

3.6.4.3 Utilities and Infrastructure

Utilities at the Project site would tie into existing utility systems in the Project vicinity and the Project developer(s) would construct the necessary connections to serve the Project. Specific service connections required for the Project are described in detail below.

Water and Wastewater Service

Water and wastewater service would be provided to the Project by the Eastern Municipal Water District (EMWD). An existing 12-inch water main and an existing 16-inch sewer main within Webster Avenue would serve the Project. The Project developer(s) would construct connections to these mains approximately 330 feet north of Ramona Expressway and the primary water and sewer lines serving the proposed buildings would run along north edge of the Project site with smaller laterals constructed throughout the site. The Project applicant would be required to pay applicable water and sewer connection fees in effect at the time of service connection.

Natural Gas Service

Natural gas service would be provided to the Project by the Southern California Gas Company (SoCalGas). Existing natural gas transmission pipelines and local service pipelines run within Webster Avenue and the Project is anticipated to make a connection to these pipelines within a developed easement east of Webster Avenue. The property owners would apply to SoCalGas to establish commercial customer connections to feed the commercial natural gas meters for the various uses proposed within the Project site. The final connection locations would be determined by SoCalGas.

Electric Service

Electric service would be provided to the Project by Southern California Edison (SCE). Electricity would be provided via a connection to the existing power supply east of Webster Avenue and the installation of power lines under the site to connect to various transformers throughout the Project site. The property owners would apply to SCE to establish commercial customer connections and these connections would feed commercial electric transformers and meters for various uses within the Project site. Telecommunications services are available from the same location and would be fed through the same pull box within the northeastern portion of the Project site.

Drainage

The Perris Valley Master Drainage Plan includes future storm drain and detention basins to capture surface runoff and convey it into underground storm drains before continuing to the Perris Valley Storm Drain system. Runoff from the Project site would be collected via underground storage facilities within each parcel, which would also provide water quality treatment. Surface runoff would be pumped from

each of the underground storage facilities to a bioswale, which would be used to treat runoff before flows from the Project site are outlet.

In addition to onsite runoff collection and treatment systems, the Project includes the installation of a 36-inch reinforced concrete storm drainpipe along Ramona Expressway that would accept and route off-site flows that drain to the southwest corner of the Project site. This off-site storm drainpipe would also function as the overflow path for onsite underground storage facilities. Off-site flows through this storm drainpipe would be carried to the east where they would outfall to the existing outlet at the southeast corner of the Project site. An existing headwall under Webster Avenue would be removed and replaced with a storm drain manhole.

3.6.5 Proposed Sustainability Features

The Project would meet or exceed all applicable standards under the CALGreen Code and the Building Energy Efficiency Standards contained in Title 24. The Project would implement concepts of efficient design and material use that are consistent with the U.S. Green Building Council's Leadership in Energy and Environmental Design green building rating system. This would be accomplished by incorporating, at a minimum, the following sustainability features or other features that are equally efficient:

Energy Efficiency

- Design building shells and components, such as windows, roof systems and electrical systems to meet California Title 24 Standards for nonresidential buildings.
- Install energy efficient light-emitting diodes (LED) lighting on the site. Provide skylights for natural daylight to reduce the lighting load, therefore saving energy. Lighting will incorporate motion sensors that turn them off when not in use.
- Meet City minimum landscape requirements and provide adequate landscape shade for the site to reduce energy use.
- Install light-colored roofing materials and light-colored paving materials.
- Refrigerants and HVAC equipment will be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global climate change. Ventilation and HVAC systems will be designed to meet or exceed the minimum outdoor air ventilation rates described in the American Society of Heating, Refrigeration, and Air Conditioning Engineers standards and/or per California Title 24 requirements.
- Incorporate Energy Star® rated space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.

Water Conservation and Efficiency

- Surface parking lots will be landscaped in accordance with City standards to reduce heat island effect.

- Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls and sensors for landscaping according to the California Department of Water Resources Model Efficient Landscape Ordinance and Chapter 19.70 (Landscaping) of the Perris Municipal Code.

- Design buildings to be water-efficient. Install water-efficient fixtures in accordance with Section 5.303 of the California Green Building Standards Code Part 11.

- Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff in accordance with City Standards.

- Provide education about water conservation and available programs and incentives to the building operators to distribute to employees.

Solid Waste

- Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1 of the CALGreen Code.

- Provide storage areas for recyclables and green waste and adequate recycling containers located in readily accessible areas in accordance with Section 5.410.1 of the CALGreen Code.

- The property operator will provide readily available information provided by the City for employee education about reducing waste and available recycling services.

Transportation and Motor Vehicles

- Limit idling time for commercial vehicles to no more than five minutes per Title 13 of the California Code of Regulations, Section 2485.

- Provide electric vehicle (EV) infrastructure and facilitate EV charging in accordance with 2022 CALGreen Code Section 5.106.5.3 Electric Vehicle Charging Requirements.

- Pursuant to Section 5.106.5.5.1 of the 2022 CALGreen Code, raceways, busways, and additional electrical capacity for transformers, service panels, or subpanels would be provided withing the warehouse building to facilitate the future installation of electric vehicle supply equipment for medium- and heavy-duty electric delivery trucks.

- Provide Class II bike lanes on Ramona Expressway, within the Project's frontage, per the City's Active Transportation Plan.

- Provide adequate bicycle parking near building entrances to promote cyclist safety, security, and convenience in compliance with Section 5.106.4 of the 2022 CALGreen Code and standard City code requirements.

Construction

- Require Construction Equipment to Turn Off When Not in Use per Title 13 of the California Code of Regulations, Section 2449.

- Use regionally produced and/or manufactured building materials, where feasible, for Project construction.

- Use “green” building materials where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way.

- Pursuant to Section 5.106.5.5.1 of the 2022 CALGreen Code, a minimum of 65% of the nonhazardous construction waste would be recycled or salvaged for reuse.

3.6.6 Project Operations

The proposed Project would involve the operation of a self-storage facility, two sit-down restaurants, six fast-food restaurants, two gas stations including convenience stores, and a car wash. At the time of this analysis, the future owners and occupants of the proposed buildings were unknown. For the purposes of evaluation in this Draft EIR, the buildings are assumed to be operational 24 hours per day. Lighting would be subject to compliance with Perris Municipal Code Section 19.02.110 and would be fully shielded to preclude light pollution or light trespass on abutting residential land uses and public rights-of-way.

3.6.7 Construction Activities

Construction of the Project is anticipated to occur over an approximately 19-month period, requiring site preparation, grading, building construction, paving, and architectural coating activities. Construction of the Project would require common construction equipment. The site-specific construction fleet may vary due to specific needs at the time of construction; however, a summary of construction equipment assumptions by construction phase used for purposes of analysis is provided in Table 3-1, *Construction Equipment Assumptions*. The duration of construction activity and associated equipment was based on information provided by the Project applicant and represents a reasonable approximation of the expected construction fleet.

Table 3-1
CONSTRUCTION EQUIPMENT ASSUMPTIONS

Equipment	Number	Hours/Day
Site Preparation		
Rubber Tired Dozers	3	8
Crawler Tractors	4	8
Grading		
Excavators	2	8
Graders	1	8
Rubber Tired Dozers	1	8
Scrapers	2	8
Crawler Tractors	2	8
Building Construction		
Cranes	1	8
Forklifts	3	8
Generator Sets	1	8
Tractors/Loaders/Backhoes	3	8
Welders	1	8
Paving		
Pavers	2	8
Paving Equipment	2	8
Rollers	2	8
Architectural Coating		
Air Compressors	1	8

Source: Urban Crossroads 2024

Construction workers would travel to the Project site by passenger vehicle and materials deliveries would occur by medium- and heavy-duty trucks. Grading for the Project is anticipated to balance earthwork quantities onsite and would not require soil import or export.

Construction activity is regulated by Perris Municipal Code Section 7.34.060, which allows construction activities during daytime hours (between the hours of 7:00 am and 7:00 pm), Monday through Saturday, except for legal holidays. Construction equipment is expected to operate at the Project site up to eight hours per day during the allowed days and time period; however, the typical working hours for most construction contractors are 7:00 a.m. to 4:00 p.m., and construction equipment is not in continual use; each piece of equipment is used only periodically during a typical construction workday. Should construction activities need to occur outside of the hours permitted by the Perris Municipal Code, the Project developer would be required to obtain authorization from the City. Should onsite concrete pouring activities need to occur at night to facilitate proper concrete curing, pours would typically occur between the hours of 2:00 a.m. and 8:00 a.m.

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

3.7 Summary of Requested Actions

The City of Perris has primary approval responsibility for the Project and is the CEQA Lead Agency for the Project, pursuant to State CEQA Guidelines Section 15050. Because the Project requires a Specific Plan Amendment, the City of Perris City Council is the decision-making authority for the requested discretionary applications (e.g., the Specific Plan Amendment, Tentative Parcel Map, Development Plan Review, and CUPs). The City's Planning Commission will consider the Specific Plan Amendment, Tentative Parcel Map, Project Development Plan, CUPs, and the Final CEQA document and recommend to the City Council whether the Project and Final EIR should be approved and certified, respectively. The City Council will make the ultimate decision if the Final EIR should be certified and whether to approve, approve with changes, or deny the Project. In the event of approval of the Project, the City would subsequently conduct administrative reviews and issue ministerial permits and approvals to implement Project requirements and conditions of approval.

The Final EIR informs state, regional, and local government approvals needed for construction and/or operation of the Project, regardless of whether such actions are known at this time or explicitly listed. A list of the anticipated actions under City jurisdiction is provided in Table 3-2, *Project Related Approvals/Permits*. In addition, other actions may be necessary from other government agencies to fully implement the Project. Table 3-2 also lists the government agencies that may be required to use the Final EIR during their consultation and review of the Project and its implementing actions and provides a summary of the anticipated subsequent actions associated with the Project.

Table 3-2
PROJECT RELATED APPROVALS/PERMITS

Agency	Approvals and Decisions
Discretionary Approvals	
City of Perris City Council	• Certification of the Environmental Impact Report (SCH No. 2024080050) with the determination that the EIR has been prepared in compliance with the requirements of CEQA. • Specific Plan Amendment (SPA 22-05280) to add self-storage as a conditionally permitted use within the PVCCSP Commercial land use designation. • Tentative Parcel Map (TPM 22-05275 [38567]) to subdivide the existing two-parcel western site into four parcels. • Tentative Parcel Map (TPM 24-05150 [38985]) to subdivide the existing one-parcel eastern site into four parcels. • Development Plan Review (DPR 22-00028) to approve the proposed western site development plan. • Development Plan Review (DPR 23-00021) to approve the proposed eastern site development plan. • Conditional Use Permit (CUP 22-05295) to allow self-storage uses on the site, designated as Commercial under the PVCCSP. • Conditional Use Permit (CUP 24-05141) to allow drive-through services on the site, designated as Commercial under the PVCCSP. • Conditional Use Permit (CUP 24-05142) to allow gas station uses with alcohol sales for off-site consumption on the site, designated as Commercial under the PVCCSP.
Riverside County Airport Land Use Commission (ALUC)	• Consistency Review (Approved July 11, 2024)
Non-Discretionary Approvals	
City of Perris Development Services	• All onsite plans, including grading, drainage, and utilities • Water Quality Management Plan (WQMP)
Regional Water Quality Control Board (RWQCB)	• Issuance of a Construction Activity General Construction Permit • Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit • Report of Waste Discharge or Water Quality Certification
South Coast Air Quality Management District (AQMD)	• Permits to construct and/or permits to operate new stationary sources of equipment that emit or control air contaminants, such as heating, ventilation, and air conditioning (HVAC) units, cooking equipment, and fuel dispensers.
Other Utility Agencies	• Permits and associated approvals, as necessary for the installation of new utility infrastructure or connections to existing facilities

3.8 References

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

Institute of Transportation Engineers. 2021. Trip Generation Manual, 11th Edition. September. Available at: https://www.ite.org/technical-resources/topics/trip-and-parking-generation/.

Urban Crossroads. 2024. Perris Gateway (DPR22-00028; CUP 22-05259; TPM 38567) Air Quality Impact Analysis. October 22.

4.0 ENVIRONMENTAL ANALYSIS

Introduction to the Environmental Analysis

Sections 4.1, *Air Quality*, and 4.2, *Greenhouse Gas Emissions*, of this Draft EIR provide analysis of potential impacts for those environmental topics where it was determined that the Project could result in "potentially significant impacts." Each topical section includes the following information:

- A description of the existing setting including a discussion of the regulatory framework, if applicable.
- Identification of thresholds of significance.
- Identification of applicable PVCCSP Standards and Guidelines if applicable.
- Analysis of potential Project effects.
- Identification of mitigation measures to reduce the identified Project impacts.
- Identification of the level of significance of impacts after mitigation, including unavoidable significant adverse impacts.
- Evaluation of potential cumulative impacts.

As described in Section 3.0, *Project Description*, of this Draft EIR, the Project involves City approval of a Specific Plan Amendment, Tentative Parcel Map, Development Plan Reviews, and CUPs to allow the construction and operation of a self-storage facility, two sit-down restaurants, six fast-food restaurants, two gas stations including convenience stores, and a car wash. Unless otherwise noted, the analysis presented in Sections 4.1 and 4.2 of this Draft EIR addresses the entire Project. Distinctions between impacts from construction and operation of the Project are made where pertinent to the topical issue.

Summary of EIR Scope

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

In compliance with the procedural requirements of CEQA, an Initial Study and Notice of Preparation were prepared to determine the scope of environmental analysis for this Draft EIR (refer to Appendix A). The City distributed the Initial Study and Notice of Preparation to public agencies and interested individuals and posted the documents on its website to solicit input on the scope of study for the Draft EIR. The City also held a Draft EIR Scoping Meeting to solicit input from the public on the scope of study for the Draft EIR. Taking all known information and public comments into consideration, two primary environmental subject areas are evaluated in detail in this Section 4.0: air quality (Section 4.1) and greenhouse gas emissions (Section 4.2). The subsections evaluate several specific topics related to the primary environmental subject. Refer to both subsections for a full account of the subject matters addressed therein.

As concluded by the Project's Initial Study (included in Appendix A of this Draft EIR) and after consideration of all comments received by the City on the scope of this Draft EIR and documented in the

City's administrative record, 18 environmental subjects were determined by the City not to be significantly impacted by the Project: aesthetics, agriculture and forestry resources, biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire. A summary of the reasons the Project would not result in a significant effect related to these subject is provided in Section 7.0, *Effects Found Not to be Significant*, and the complete Initial Study is provided in Appendix A.

Identification of Impacts

Sections 4.1 and 4.2 of this Draft EIR evaluate the two environmental subjects warranting detailed analysis as identified in the Project Initial Study and Notice of Preparation, and in consideration of public comments. Within these sections, the environmental setting is discussed first, followed by applicable regulations, CEQA thresholds of significance, and finally a discussion of the potential environmental impacts that would result from implementation of the Project (which is based on the specified thresholds of significance used as criteria to determine whether potential environmental effects would be significant).

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

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

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

Assumptions Regarding Cumulative Impacts

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

As defined in State CEQA Guidelines Section 15355:

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

The discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the Project alone (State CEQA Guidelines Section15130(b)).

State CEQA Guidelines Section 15130(b) describes two acceptable methods for conducting a cumulative impact analysis. These two approaches include: "(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency ['the list of projects approach'], or (B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency. ['the summary of projections approach']."

Primarily, the "summary of projections approach" is used for the Project's cumulative impact analysis, which is based on plans and reports from the South Coast Air Quality Management District (AQMD). Because of the nature of individual environmental factors, the cumulative area for the two topical issues is not the same. An explanation of the cumulative analysis, including the cumulative study area, is provided individually in Section 4.1 and Section 4.2.

Mitigation Program

The mitigation program identified for each topical issue to reduce potential Project impacts consists of mitigation measures from the PVCCSP EIR that were deemed applicable to the proposed Project. Additional project-specific mitigation measures are considered for significant impacts.

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

REFERENCES

Albert A. Webb Associates. 2011. Perris Valley Commerce Center Specific Plan Final Environmental Impact Report SCH No. 2009081016. City of Perris. Available from: https://www.cityofperris.org/home/showpublisheddocument/2645/637455522835370000.

Perris, City of (City). 2004. Draft Environmental Impact Report City of Perris General Plan 2030 (SCH No. 2004031135). October. Available at: https://www.cityofperris.org/departments/development-services/general-plan. Accessed September 30, 2024.

4.1 Air Quality

This section provides a Project-specific air quality analysis, consistent with the requirements of the PVCCSP EIR. The analysis contained in this section is based on the Project's *Air Quality Impact Analysis* (Urban Crossroads 2025) which is contained in Appendix B of this Draft EIR.

Comments relating to the issue of air quality and health risk were provided by the South Coast AQMD in response to the August 2024 Notice of Preparation. The South Coast AQMD recommended that the City use the South Coast AQMD's CEQA Air Quality Handbook and website as guidance when preparing the air quality and greenhouse gas analyses and that the Project include a health risk assessment and mitigation measures, as necessary, to reduce adverse air quality impacts. The South Coast AQMD also requested that the City send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses for their review. At the scoping meeting, commenters expressed concern about the Project's potential air quality impacts, particularly related to queuing.

4.1.1 Existing Setting

4.1.1.1 South Coast Air Basin

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

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

4.1.1.2 Criteria Air Pollutants

Criteria pollutants are pollutants that are regulated through the development of human health based and/or environmentally based criteria for setting permissible levels. As described in Section 4.2 of the PVCCSP EIR, air pollutants are classified as either primary or secondary, depending on how they are formed. Primary pollutants are emitted directly from a source into the atmosphere. Examples of primary pollutants include carbon monoxide (CO), nitrogen dioxide (NO_2) and nitric oxide (NO) (which are collectively known as oxides of nitrogen [NO_X]), sulfur dioxide (SO_2), particulates 10 microns or less in diameter (PM_{10}), particulates 2.5 microns or less in diameter ($PM_{2.5}$), and volatile organic compounds (VOC). The predominant source of air pollutant emissions generated by Project development would be from vehicle emissions. Motor vehicles primarily emit CO, NO_X, VOC, and particulate matter.

Secondary pollutants are created over time and are formed in the atmosphere as chemical and photochemical reactions take place. An example of a secondary pollutant is ozone (O_3), which is one of the products formed when NO_X reacts with VOC in the presence of sunlight. Other secondary pollutants include photochemical aerosols. Secondary pollutants such as ozone represent major air quality problems in the South Coast Air Basin.

The Federal Clean Air Act of 1970 established the National Ambient Air Quality Standards. Six "criteria" air pollutants have now been identified using specific medical evidence, and national standards have been established for those pollutants. The State of California has adopted standards (known as California Ambient Air Quality Standards) for the same seven criteria pollutants, but the state has established more restrictive allowable levels. The six federally regulated criteria pollutants are carbon monoxide, nitrogen dioxide, ozone, lead, particulate matter, and sulfur dioxide. The national and California ambient air quality standards currently in effect are shown in Table 4.1-1, *Ambient Air Quality Standards* (California Air Resources Board [CARB] 2024). Further discussion of the criteria pollutants, their sources, and their effects on human health can be found in Section 4.2 of the PVCCSP EIR.

4.1.1.3 Existing Air Quality

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

The most recent state and federal standards were updated by CARB on July 16, 2024, as presented in Table 4.1-1. The air quality in a region is considered to be in attainment by the state if the measured ambient air pollutant levels for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, PM_{10}, and $PM_{2.5}$ do not exceed the applicable standards. All others are not to be equaled or exceeded. Attainment status for a pollutant means that the South Coast Air Basin meets the standards set by the U.S. Environmental Protection Agency (EPA) or the California EPA (CalEPA). Conversely, nonattainment means that an area has monitored air quality that does not meet the national or California ambient air quality standards. To improve air quality in nonattainment areas, CARB has implemented a State Implementation Plan (SIP). The SIP outlines the measures that the state will take to improve air quality. Once nonattainment areas meet the standards and additional redesignation requirements, the EPA designates the area as a maintenance area (EPA 2024a).

4.1.1.4 Regional Air Quality

The South Coast AQMD has designated general forecast areas and air monitoring areas (referred to as Source Receptor Areas [SRAs]) throughout its jurisdiction to provide Southern California residents with information about air quality conditions. The South Coast AQMD monitors levels of various criteria pollutants at 37 permanent monitoring stations and 5 single-pollutant (lead) monitoring sites throughout the air district (South Coast AQMD 2023a). The ambient air pollutant levels determine if the South Coast Air Basin is in attainment or nonattainment for each criteria pollutant. See Table 4.1-2, *Attainment Status of Criteria Pollutants in the South Coast Air Basin*, for attainment designations for the South Coast Air Basin (CARB 2022).

Table 4.1-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards	Federal Standards Primary[1]	Federal Standards Secondary[2]
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m^3)	–	–
	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)	Same as Primary
PM_{10}	24 Hour	50 µg/m^3	150 µg/m^3	Same as Primary
	AAM	20 µg/m^3	–	Same as Primary
$PM_{2.5}$	24 Hour	–	35 µg/m^3	Same as Primary
	AAM	12 µg/m^3	9.0 µg/m^3	15.0 µg/m^3
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	–
	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)	–	–
Nitrogen Dioxide (NO_2)	1 Hour	0.18 ppm (339 µg/m^3)	0.100 ppm (188 µg/m^3)	–
	AAM	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)	Same as Primary
Sulfur Dioxide (SO_2)	1 Hour	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m^3)
	24 Hour	0.04 ppm (105 µg/m^3)	–	–
Lead	30-day Avg.	1.5 µg/m^3	–	–
	Calendar Quarter	–	1.5 µg/m^3	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m^3	Same as Primary
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥30 miles for Lake Tahoe)	No Federal Standards	No Federal Standards
Sulfates	24 Hour	25 µg/m^3	No Federal Standards	No Federal Standards
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	No Federal Standards	No Federal Standards
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m^3)	No Federal Standards	No Federal Standards

Source: CARB 2024

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

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

ppm = parts per million; µg/m^3 = micrograms per cubic meter; PM_{10} = particulate matter with a diameter of 10 microns or less; AAM = Annual Arithmetic Mean; $PM_{2.5}$ = fine particulate matter;
km = kilometer; – = No Standard

Table 4.1-2
ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SOUTH COAST AIR BASIN

Criteria Pollutant	State Designation	Federal Designation
Ozone – 1-hour standard[1]	Nonattainment	--
Ozone – 8-hour standard	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
Carbon Monoxide (CO)	Attainment	Unclassifiable/Attainment
Nitrogen Dioxide (NO_2)	Attainment	Unclassifiable/Attainment
Sulfur Dioxide (SO_2)	Unclassifiable/Attainment	Unclassifiable/Attainment
Lead (Pb)[2]	Attainment	Unclassifiable/Attainment

Source: CARB 2022

[1] The national 1-hour ozone standard was revoked effective June 15, 2005.

[2] The Federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the South Coast Air Basin.

PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = fine particulate matter

4.1.1.5 Local Air Quality

The City of Perris is located within the Perris Valley Source Receptor Area (SRA 24). Prior to 2021, ambient air emissions of PM_{10} within SRA 24 were monitored at the Perris Valley monitoring station, which was located approximately 3.93 miles south of the Project site within SRA 24. Ambient air quality concentrations are no longer monitored within SRA 24. The Lake Elsinore monitoring station, which is located 12.64 miles southwest of the Project site in SRA 25, records air quality data for carbon monoxide and nitrogen dioxide. The Riverside County 1 monitoring station, which is located 14.10 miles northwest of the Project site in Source Receptor Area 23 records air quality data for $PM_{2.5}$. It should be noted that data from Lake Elsinore and Riverside County 1 monitoring station was utilized in lieu of the Perris Valley monitoring station only in instances where data was no longer collected and available.

Data from 2021-2023 is shown in Table 4.1-3, *Project Area Air Quality Monitoring Summary 2021-2023*, and identifies the number of days ambient air quality standards were exceeded for the Project area, which is considered to be representative of the local air quality at the Project site. Data for ozone, nitrogen dioxide, PM_{10}, and $PM_{2.5}$ for 2021 through 2023 was obtained from the South Coast AQMD Air Quality Data Tables (South Coast AQMD 2024). Additionally, data for sulfur dioxide has been omitted, as attainment is regularly met in the South Coast Air Basin, and few monitoring stations measure sulfur dioxide concentrations.

4.1.1.6 Toxic Air Contaminants and Diesel Emissions

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

Table 4.1-3
PROJECT AREA AIR QUALITY MONITORING SUMMARY 2021-2023

Pollutant	Standard	Year		
		2021	2022	2023
Ozone (O_3)				
Maximum Federal 1-Hour Concentration (ppm)		0.117	0.121	0.120
Maximum Federal 8-Hour Concentration (ppm)		0.094	0.091	0.103
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	25	17	10
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	60	37	35
Carbon Monoxide (CO)				
Maximum Federal 1-Hour Concentration	> 35 ppm	0.9	0.9	1.3
Maximum Federal 8-Hour Concentration	> 20 ppm	0.8	0.6	0.7
Nitrogen Dioxide (NO_2)				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.044	0.037	0.042
Annual Federal Standard Design Value		0.007	0.007	0.007
PM_{10}				
Maximum Federal 24-Hour Concentration ($\mu g/m^3$)	> 150 $\mu g/m^3$	89	91	186
Annual Federal Average ($\mu g/m^3$)		21.4	19.8	20.8
Number of Days Exceeding Federal 24-Hour Standard	> 150 $\mu g/m^3$	0	0	1
Number of Days Exceeding State 24-Hour Standard	> 50 $\mu g/m^3$	4	1	5
$PM_{2.5}$				
Maximum Federal 24-Hour Concentration ($\mu g/m^3$)	> 35 $\mu g/m^3$	82.10	38.5	48.7
Annual Federal Average ($\mu g/m^3$)	> 12[1] $\mu g/m^3$	12.58	10.80	10.47
Number of Days Exceeding Federal 24-Hour Standard	> 35 $\mu g/m^3$	10	1	1

Source: Data for ozone, carbon monoxide, nitrogen dioxide, PM_{10}, and $PM_{2.5}$ was obtained from South Coast AQMD Air Quality Data Tables (South Coast AQMD 2024).

1 The federal standard was lowered from 12 $\mu g/m^3$ to 9 $\mu g/m^3$ on February 7, 2024, after this data was collected.

ppm = parts per million; $\mu g/m^3$ = microgram per cubic meter; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = fine particulate matter

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

4.1.1.7 Cancer Risk Trends

Based on information available from CARB, overall cancer risk throughout the South Coast Air Basin has generally declined since 1990. In 1998, following an exhaustive 10-year scientific assessment process, CARB identified particulate matter from diesel-fueled engines as a toxic air contaminant. The South Coast AQMD initiated a comprehensive urban toxic air pollution study called the Multiple Air Toxics Exposure Study (MATES). MATES is updated periodically, with the most recent version beginning in January 2018 as part of the MATES V Program (South Coast AQMD 2017). MATES V is the first iteration to estimate cancer risks using both inhalation and non-inhalation pathways, which is consistent with the South Coast AQMD's methodology for estimating cancer risk. Diesel particulate matter is included in this cancer risk along with all other toxic air contaminant sources. As in previous MATES iterations, MATES V finds diesel particulate matter to be the largest contributor to overall air toxics cancer risk, constituting more than 70 percent of the cancer risk within the South Coast Air Basin. However, the average levels of

diesel particulate matter in MATES V are 53 percent lower compared to MATES IV (South Coast AQMD 2021).

4.1.1.8 Sensitive Receptors

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects, including children, the elderly, and individuals with pre-existing respiratory or cardiovascular illness. Structures that house these persons or places where they gather are defined as "sensitive receptors." Commercial, educational, and industrial facilities are not included in the definition of sensitive receptors because employees and patrons do not typically remain onsite for a full 24 hours, but are typically on site for eight hours or less. However, when conducting a Localized Significance Threshold (LST) analysis (discussed in more detail in Section 4.1.4 below), any adjacent land use where an individual could remain for one to eight hours, that is located at a closer distance to the Project site than the receptor used in the PM_{10} and $PM_{2.5}$ analysis, must be considered to determine construction and operational LST air impacts for emissions of nitrogen dioxide and carbon monoxide since these pollutants have an averaging time of one and eight hours. Sensitive receptors in the vicinity of the Project site include single family residences to the northeast and southeast and a learning center and high school to the south.

4.1.2 Existing Policies and Regulations

4.1.2.1 Federal

The EPA is responsible for setting and enforcing the National Ambient Air Quality Standards for ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, $PM_{2.5}$, PM_{10}, and lead. The EPA has jurisdiction over emissions sources that are under the authority of the federal government including aircraft, locomotives, and emissions sources outside state waters (Outer Continental Shelf). The EPA also establishes emission standards for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission requirements of CARB.

The Federal Clean Air Act was first enacted in 1955 and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The Clean Air Act establishes the National Ambient Air Quality Standards and specifies future dates for achieving compliance (EPA 2024b). The Clean Air Act also mandates that states submit and implement SIPs for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards would be met.

The 1990 amendments to the Clean Air Act that identify specific emission reduction goals for areas not meeting the National Ambient Air Quality Standards require a demonstration of reasonable further progress toward attainment and incorporate additional sanctions for failure to attain or to meet interim milestones. The sections of the Clean Air Act most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions were established with the goal of attaining the National Ambient Air Quality Standards for the following criteria pollutants: ozone, nitrogen dioxide, sulfur dioxide, PM_{10}, carbon monoxide, $PM_{2.5}$, and lead. The National Ambient Air Quality Standards were amended in July 1997 to include an additional standard for ozone and to adopt a national ambient air quality standard for $PM_{2.5}$. Table 4.1-1, above, provides the National Ambient Air Quality Standards.

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

4.1.2.2 State

California Air Resources Board

CARB, which became part of the CalEPA in 1991, is responsible for ensuring implementation of the California Clean Air Act (Assembly Bill [AB] 2595), responding to the federal Clean Air Act, and for regulating emissions from consumer products and motor vehicles. AB 2595 mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources to attain the state ambient air quality standards by the earliest practical date. CARB established the California Ambient Air Quality Standards for all pollutants for which the federal government has National Ambient Air Quality Standards and, in addition, establishes standards for sulfate, visibility, hydrogen sulfide, and vinyl chloride. However, currently, hydrogen sulfide and vinyl chloride are not measured at any monitoring stations in the South Coast Air Basin because they are not considered to be a regional air quality problem. The California Ambient Air Quality Standards are more stringent than the National Ambient Air Quality Standards (CARB 2024; EPA 2024c).

Local air quality management districts, such as the South Coast AQMD, regulate air emissions from stationary sources such as commercial and industrial facilities. All air pollution control districts have been formally designated as attainment or non-attainment for each California ambient air quality standard, as shown in Table 4.1-1.

Serious non-attainment areas are required to prepare Air Quality Management Plans (AQMPs) that include specified emission reduction strategies to meet clean air goals. CARB utilizes the AQMPs from non-attainment areas to compile the SIP, which outlines the measures that the State will take to improve air quality.

Title 24 Energy Standards and California Green Building Standards

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

Title 24 is updated on a regular basis, with the most recently approved update consisting of the 2022 CALGreen Code that went into effect on January 1, 2023. The California Energy Commission anticipates that the 2022 energy code will provide $1.5 billion in consumer benefits and reduce greenhouse gas emissions by 10 million metric tons (California Energy Commission 2021). The Project would be required to comply with the applicable standards in place at the time building permit document submittals are made. The measures applicable to air quality are as follows (California Department of General Services 2023):

Nonresidential Mandatory Measures

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (CALGreen Code Section 5.106.4.1.1).

- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (CALGreen Code Section 5.106.4.1.2).

- Designated parking for clean air vehicles. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in CALGreen Code Table 5.106.5.2 (CALGreen Code Section 5.106.5.2).

- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in CALGreen Code Table 5.106. 5.3.3 (CALGreen Code Section 5.106.5.3). Additionally, CALGreen Code Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.

4.1.2.3 Regional

South Coast AQMD Air Quality Management Plan

Currently, the national and California ambient air quality standards for ozone and particulate matter are exceeded in most parts of the South Coast Air Basin, as shown in Table 4.1-2. In response, the South Coast AQMD has adopted a series of AQMPs to meet the state and federal ambient air quality standards. AQMPs are updated regularly to ensure an effective reduction in emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. The current 2022 AQMP was adopted by the South Coast AQMD Governing Board in December 2022. The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the National Ambient Air Quality Standards, as well as explore new and innovative methods to reach its goals.

South Coast AQMD Rules

The South Coast AQMD has established various rules/regulatory requirements applicable to development projects. The following provides a discussion of South Coast AQMD rules particularly relevant to the Project, which address construction-related and operational activities.

South Coast AQMD Rule 201

A person shall not build, erect, install, alter, or replace any equipment permit unit, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants without first obtaining written authorization for such construction from the

Executive Officer. A permit to construct shall remain in effect until the permit to operate the equipment for which the application was filed as granted or denied, or the application is canceled.

South Coast AQMD Rule 401

A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated number 1 on the Ringelmann Chart, as published by the U.S. Bureau of Mines.

South Coast AQMD Rule 402

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

South Coast AQMD Rule 403

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

South Coast AQMD Rule 461

This rule attempts to reduce the health risk from gasoline transfer to and from underground storage tanks and dispensing from surface fueling stations. All gas dispensing facilities must have a vapor recovery system with an efficiency of at least 98%, an emission factor not exceeding 0.15 pounds of VOC per 1,000 gallons of gasoline for transfer between storage tanks and dispensing facilities, and an emission factor not exceeding 0.38 pounds of VOC per 1,000 gallons of gasoline when dispensing into customer vehicles.

South Coast AQMD Rule 1113

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

South Coast AQMD Rule 1301

This rule is intended to provide that pre-construction review requirements to ensure that new or relocated facilities do not interfere with progress in attainment of the National Ambient Air Quality Standards, while future economic growth within the South Coast AQMD is not unnecessarily restricted. The specific air quality goal is to achieve no net increases from new or modified permitted sources of nonattainment air contaminants or their precursors. Rule 1301 also limits emission increases of

ammonia, and Ozone Depleting Compounds from new, modified or relocated facilities by requiring the use of Best Available Control Technology.

South Coast AQMD Rule 1401

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

4.1.2.4 Local

City of Perris General Plan

The Conservation Element, Healthy Community Element, and Environmental Justice Element of the City of Perris General Plan include policies related to air quality. The specific policies of the General Plan related to air quality that are relevant to the proposed Project are identified in Table 4.1-4, *General Plan Consistency Analysis*, below.[1]

Table 4.1-4
GENERAL PLAN CONSISTENCY ANALYSIS

Policy Number	Policy	Statement of Consistency
Conservation Element		
Policy X.B	Encourage the use of trees within Project design to lessen energy needs, reduce the urban heat island effect, and improve air quality throughout the region.	The Project is proposed to provide approximately 23 percent landscape cover within the western site and approximately 10 percent landscape cover within the eastern site. This would include a variety of trees throughout the site and parking areas. The Project would be consistent with Conservation Policy X.B.
Healthy Community Element		
Policy HC 6.3	Promote measures that will be effective in reducing emissions during construction activities • Perris will ensure that construction activities follow existing SCAQMD rules and regulations	Construction activities would follow applicable South Coast AQMD and CARB rules and regulations, and PVCCSP EIR mitigation measures for construction emissions. The Project would comply with Policy HC 6.3.

[1] The South Coast AQMD is referred to as the SCAQMD in the City of Perris General Plan.

Policy Number	Policy	Statement of Consistency
	• All construction equipment for public and private projects will also comply with CARB's vehicle standards. For projects that may exceed daily construction emissions established by the SCAQMD, Best Available Control Measures will be incorporated to reduce construction emissions to below daily emission standards established by the SCAQMD • Project proponents will be required to prepare and implement a Construction Management Plan which will include Best Available Control Measures. among others. Appropriate control measures will be determined on a project by project basis, and should be specific to the pollutant for which the daily threshold is exceeded	
Environmental Justice Element		
Goal 6.2 Policy	Discourage development in proximity to sensitive land uses (e.g., schools, hospitals, homes, and long-term care facilities) near source point pollution sources that impact health, including freeways and hazardous waste sites.	The Project site is in proximity to single-family residences, schools, and warehouses. However, the proposed gas station land use (a point pollution source) would be located over 50 feet from the nearest residences as recommended by CARB (2005). The new fuel facility would require authority to construct and permit to operate approval from the South Coast AQMD, which would review the facility design and location for compliance with South Coast AQMD standards for criteria pollutants and air quality. The Project would be consistent with this Environmental Justice Policy.

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The Project site is located within the PVCC area. As such, and unless otherwise noted, the Project would be required to comply with the following applicable PVCCSP EIR mitigation measures. In the PVCCSP EIR, the South Coast AQMD is referred to as the SCAQMD and the EPA is referred to as the USEPA. PVCCSP EIR mitigation measures MM Air 1 and MM Air 10 have been complied with as part of the Air Quality Impact Analysis prepared for the Project and the results have been incorporated into the analysis contained in this EIR section. PVCCSP EIR mitigation measure MM Air 18 has been complied with through coordination with the RTA.

MM Air 1 To identify potential implementing development project-specific impacts resulting from construction activities, proposed development projects that are subject to CEQA shall

have construction-related air quality impacts analyzed using the latest available URBan EMISsions (URBEMIS) model, or other analytical method determined in conjunction with the SCAQMD. The results of the construction-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Thresholds analysis or other appropriate analyses as determined in conjunction with SCAQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.

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

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

- requiring the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain),
- keeping disturbed/loose soil moist at all times,
- requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered,
- installation of wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip,
- posting and enforcement of traffic speed limits of 15 miles per hour (mph) or less on all unpaved potions of the project sites,
- suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 mph,

- appointment of a construction relations officer to act as a community liaison concerning onsite construction activity including resolution of issues related to Particulate Matter 10 microns in diameter or less (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,

- replacement of ground cover in disturbed areas as quickly as possible.

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

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

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

MM Air 7 During construction, ozone 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 onsite 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% 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 MM prior to issuance of a building permit for that project.

MM Air 10 To identify potential implementing development project-specific impacts resulting from operational activities, proposed development projects that are subject to CEQA shall have long-term operational-related air quality impacts analyzed using the latest available URBEMIS model, or other analytical method determined by the City of Perris as lead agency in conjunction with the SCAQMD. The results of the operational-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's LST analysis, CO Hot Spot analysis, or other appropriate analyses as determined by the City in conjunction with SCAQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.

MM Air 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 will be required prior to the issuance of occupancy permits.

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

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

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

4.1.3 Thresholds of Significance

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

a) Conflict with or obstruct implementation of the applicable air quality plan;

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard;

c) Expose sensitive receptors to substantial pollutant concentrations; or

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The South Coast AQMD has developed regional significance thresholds for criteria pollutants, as summarized in Table 4.1-5, *Maximum Daily Regional Emissions Thresholds*. The South Coast AQMD's CEQA Air Quality Significance Thresholds (South Coast AQMD 2023b) indicate that any projects within the South Coast Air Basin with daily emissions that exceed the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

Table 4.1-5
MAXIMUM DAILY REGIONAL EMISSIONS THRESHOLDS

Pollutant	Regional Construction Threshold (pounds per day)	Regional Operational Thresholds (pounds per day)
NO_X	100	55
VOC	75	55
PM_{10}	150	150
$PM_{2.5}$	55	55
SO_X	150	150
CO	550	550
Lead	3	3

Source: South Coast AQMD 2023b
NO_x = nitrogen oxides; VOC = volatile organic compounds; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less; SO_x = sulfur oxides; CO = carbon monoxide

The South Coast AQMD developed the LST methodology to assist lead agencies in analyzing localized impacts associated with project-specific level proposed projects. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The South Coast AQMD produced screening look-up tables for projects less than or equal to 5 acres in size. The South Coast AQMD's screening look-up tables are utilized in determining the significance of the Project's localized air quality impacts, and to determine if further detailed analysis is required. It should be noted that since the look-up tables identify thresholds at only 1 acre, 2 acres, and 5 acres, linear regression has been utilized to determine LSTs for the Project. Consistent with South Coast AQMD guidance, the thresholds presented in Table 4.1-6, *South Coast AQMD Maximum Daily Localized Construction Emissions Thresholds*, were calculated by interpolating the threshold values for the Project's disturbed acreage by phase. LSTs for a 5-acre site during operations are used as a screening

tool to determine if further detailed analysis is required, as shown in Table 4.1-7, *South Coast AQMD Maximum Daily Operational Localized Emissions Thresholds*.

Table 4.1-6
SOUTH COAST AQMD MAXIMUM DAILY LOCALIZED CONSTRUCTION EMISSIONS THRESHOLDS

Construction Activity	Construction Localized Thresholds (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Site Preparation	220	1,230	13	6
Grading	237	1,346	14	7

Source: Urban Crossroads 2025
NO_x = nitrogen oxides; CO = carbon monoxide; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less

Table 4.1-7
SOUTH COAST AQMD MAXIMUM DAILY OPERATIONAL LOCALIZED EMISSIONS THRESHOLDS

Operational Localized Thresholds (pounds per day)			
NO_X	CO	PM_{10}	$PM_{2.5}$
270	1,577	4	2

Source: South Coast AQMD 2008
NO_x = nitrogen oxides; CO = carbon monoxide; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less

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

> *"…the SCAQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.*
>
> *Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."*

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the South Coast AQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which South Coast Air Basin is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed South Coast AQMD thresholds for project-specific impacts would be considered cumulatively considerable.

4.1.4 Environmental Impacts

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

Impact Analysis

As described in Section 4.1.2.3 above, the South Coast AQMD's 2022 AQMP includes strategies for meeting the national and California ambient air quality standards. Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2, and Section 12.3 of the South Coast AQMD CEQA Handbook (South Coast AQMD 1993). These criteria and an associated discussion of the Project's compliance with the criteria are discussed below.

Consistency Criterion 1

The proposed Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

The violations that Consistency Criterion 1 refers to are the California and national ambient air quality standards and the South Coast AQMD regional thresholds. As discussed previously, the LSTs have been developed to determine whether there is a potential for a project to cause localized exceedances of the national and/or California ambient air quality standards, which would occur if significance thresholds were exceeded. As such, projects, uses, and activities that do not exceed any applicable LSTs would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the South Coast AQMD's recommended daily regional emissions thresholds.

Construction Impacts – Consistency Criterion 1

Construction-related California and National Ambient Air Quality Standards violations would occur if localized or regional significance thresholds were exceeded. As evaluated in threshold (c) below, the Project's localized construction-source emissions would not exceed applicable regional significance thresholds or LST thresholds. As such, the Project would not conflict with the first criterion for construction impacts.

Operational Impacts – Consistency Criterion 1

As discussed in threshold (c) below, the Project's localized operational-source emissions would not exceed applicable LSTs. As such, the Project would not conflict with the first criterion for operational impacts.

Consistency Criterion 2

The Project will not exceed the assumptions in the AQMP or increments based on the year of Project build-out and phase.

The 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the South Coast AQMD are provided to SCAG, which develops regional growth forecasts, which

are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in the City of Perris General Plan is considered to be consistent with the AQMP.

Operational Impacts – Consistency Criterion 2

Pursuant to the PVCCSP, the Project site is designated for Commercial uses. The Commercial designation provides for retail, professional office, and service-oriented business activities which serve the entire City, as well as the surrounding neighborhoods. This zone combines the General Plan Land Use designations of Community Commercial and Commercial Neighborhood.

The Project is proposed to consist of 12,000 square feet of high-turnover sit-down restaurant use, 18,400 square feet of fast-food restaurant with drive-through window use, two gas stations totaling 32-vehicle fueling positions, an automated car wash with 1 tunnel, and 80,478 square feet of self-storage use. The Project proposes a Specific Plan Amendment to make the self-storage use consistent with the site's land use designation. The self-storage component has a lower trip generation rate than other commercial uses and could therefore be considered less emissions intensive than the AQMP assumption for commercial uses. Therefore, the Project would not conflict with the goals and objectives of the AQMP. In conclusion, the Project is determined to be consistent with the second criterion.

Significance of Impacts

The Project would be consistent with the City of Perris and SCAG growth projects that are used to develop future air quality forecasts for the AQMP. The localized emissions generated during construction and operation of the Project would not exceed applicable LSTs and, as such, would not jeopardize attainment of the air quality levels identified in the AQMP. The impact of the Project would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact Analysis

Construction Emissions

Construction activities associated with the Project would result in emissions of the criteria pollutants VOC, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Construction related emissions are expected from the following construction activities: site preparation, grading, building construction, paving, architectural coating, and on-road trips (associated with workers and vendors). The Project would result in approximately 685 total working-days of construction activity.

The estimated maximum daily construction emissions are summarized in Table 4.1-8, *Overall Construction Emissions Summary*. Detailed construction model outputs are presented in Appendix 3.1 of the Project Air Quality Impact Analysis (Appendix B to this EIR). Under the assumed scenarios (refer to Project Air Quality Impact Analysis for specific construction scenario assumptions), emissions resulting from the Project construction would not exceed criteria pollutant thresholds established by the South Coast AQMD for emissions of any criteria pollutant. This impact would be less than significant.

Table 4.1-8
OVERALL CONSTRUCTION EMISSIONS SUMMARY

Year	Emissions (pounds per day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer (Smog Season)						
2025	0.59	10.35	19.85	0.03	0.94	0.30
2026	3.71	19.03	33.26	0.05	1.39	0.50
Winter						
2024	0.90	19.62	36.63	0.06	6.00	2.84
2025	3.71	19.15	32.24	0.05	1.39	0.50
2026	3.69	19.09	31.93	0.05	1.39	0.50
Maximum Daily Emissions	**3.71**	**19.62**	**36.63**	**0.06**	**6.00**	**2.84**
South Coast AQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: Urban Crossroads 2025; CalEEMod construction-source (unmitigated) emissions are presented in Appendix 3.1 of the Project Air Quality Impact Analysis (Appendix B to this EIR).

VOC = volatile organic compounds; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less

Although the construction emissions generated by the Project would be less than significant, the Project would be required to comply with the applicable PVCCSP EIR mitigation measures described in Section 4.2.2.5. These measures would reduce the Project's contribution to cumulative air quality impacts within the PVCC area.

Operational Emissions

Operational activities associated with the Project would result in emissions of the criteria pollutants VOC, NO_X, SO_X, carbon monoxide, PM_{10}, and $PM_{2.5}$. Operational emissions are expected from the following primary sources:

- Area Source Emissions – including architectural coatings, consumer products, and landscape maintenance equipment;

- Energy Source Emissions – including combustion emissions associated with natural gas As the Project tenants are unknown, natural gas equipment could be used in their course of business. Including emissions from potential uses of natural gas presents a conservative analysis for CEQA purposes;

- Mobile Source Emissions – derived primarily from vehicle trips generated by the Project, including employee trips to and from the site, truck trips associated with the proposed uses, and retail customers. Fugitive dust emanations due to the generation of road dust are also included in mobile source emissions; and

- Gasoline Dispensing Emissions – including the storage, transfer, and dispensing of gasoline at the Project's two gas stations.

Operational-source emissions associated with the Project are summarized in Table 4.1-9, *Summary of Peak Operational Emissions*. As indicated in Table 4.1-9, the Project would exceed regional thresholds of significance established by the South Coast AQMD for emissions of VOC, NO_X, carbon monoxide, and PM_{10}. Over 87 percent of operational-source VOC emissions would be generated from the use of consumer products and mobile activities, and mobile source emissions alone would exceed the regional significance threshold for VOC. Similarly, 90 percent of operational-source NO_X, CO, and PM_{10} emissions would be generated from mobile sources.

Table 4.1-9
SUMMARY OF PEAK OPERATIONAL EMISSIONS

Source	Emissions (lbs./day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer (Smog Season)						
Mobile Source	72.56	72.81	681.03	1.73	152.25	39.51
Area Source	3.76	0.05	5.49	0.00	0.01	0.01
Energy Source	0.08	1.45	1.22	0.01	0.11	0.11
Onsite Equipment	6.47	0.00	0.00	0.00	0.00	0.00
Total Maximum Daily Emissions	**82.86**	**74.31**	**687.74**	**1.74**	**152.37**	**39.63**
South Coast AQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**YES**	**YES**	**YES**	**NO**	**YES**	**NO**
Winter						
Mobile Source	67.92	78.07	567.64	1.62	152.25	39.51
Area Source	2.85	0.00	0.00	0.00	0.00	0.00
Energy Source	0.08	1.45	1.22	0.01	0.11	0.11
Onsite Equipment	6.47	0.00	0.00	0.00	0.00	0.00
Total Maximum Daily Emissions	**77.32**	**79.52**	**568.86**	**1.63**	**152.36**	**39.62**
South Coast AQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**YES**	**YES**	**YES**	**NO**	**YES**	**NO**

Source: Urban Crossroads 2025
VOC = volatile organic compounds; NO_x = nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less

Significance of Impacts

Emissions resulting from Project construction would not exceed criteria pollutant thresholds established by the South Coast AQMD for emissions of any criteria pollutant and impacts would be less than significant. Operation of the Project would exceed regional thresholds of significance established by the South Coast AQMD for emissions of VOC, NO_X, CO and PM_{10} and impacts would be potentially significant.

Mitigation Measures

As previously stated, the Project would be required to comply with the applicable PVCCSP EIR mitigation measures described in Section 4.2.2.5. The vast majority of the emissions would be generated by mobile sources. No Project-specific mitigation measures are currently available that would further reduce the Project's operational emissions to a less than significant level.

Level of Significance After Mitigation

Although the Project would implement the PVCCSP mitigation measures in Section 4.2.2.5, it should be noted that there is no way to definitively quantify these reductions. Neither the Project applicant nor the Lead Agency (City) can substantively or materially affect reductions in Project mobile-source emissions beyond the regulatory requirements and mitigation measures identified herein. Therefore, the proposed Project would result in a significant and unavoidable impact on criteria pollutant emissions.

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

Impact Analysis

Localized Significance Thresholds

LSTs represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable national and California ambient air quality standards at the nearest residence or sensitive receptor. The sensitive receptors used for this analysis are shown in Figure 4.1-1, *Sensitive Receptors*, and include the following:

R1: Location R1 represents the existing residence at 4063 N Webster Avenue, approximately 94 feet east of the Project site. Receptor R1 is placed at the outdoor living areas (backyards) facing the Project site.

R2: Location R2 represents the existing residence at 4063 N Webster, approximately 469 feet east of the Project site. Receptor R2 is placed at the outdoor living areas (backyards) facing the Project site.

R3: Location R3 represents the existing residence at 3832 Brennan Avenue approximately 1,405 feet southeast of the Project site. Receptor R3 is placed at the outdoor living areas (backyards) facing the Project site.

R4: Location R4 represents the property line of the Val Verde Regional Learning Center athletic field at 3710 Webster Avenue, approximately 1,884 feet south of the Project site. Receptor R4 is placed at the building façade.

R5: Location R5 represents Val Verde High School at 972 Morgan Street, approximately 1,900 feet south of the Project site. Receptor R5 is placed at the building façade.

R6: Location R6 represents the Chevron at 796 Ramona Expressway, approximately 72 feet east of the Project site. Receptor R6 is placed at the building façade.

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Source: URBAN CROSSROADS, 2024

HELIX Environmental Planning

Sensitive Receptors

Figure 4.1-1

The nearest sensitive receptor to the Project site is Location R1, which represents the existing residence at 4063 N Webster Avenue, approximately 94 feet east of the Project site. Other sensitive receptors include additional residences located less than 2,000 feet away and Val Verde High School, approximately 1,900 feet south of the Project site. Consistent with the LST Methodology, the nearest land use to the Project site where an individual could remain for 24 hours has been used to determine construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$, since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time. LSTs apply, even for non-sensitive land uses, consistent with LST Methodology and South Coast AQMD guidance.

Per the LST Methodology, commercial, educational, and industrial facilities are not included in the definition of sensitive receptor because employees and patrons do not typically remain onsite for a full 24 hours but are typically onsite for 8 hours or less. However, LST Methodology explicitly states that "LSTs based on shorter averaging periods, such as the nitrogen dioxide and carbon monoxide LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours" (South Coast AQMD 2008). Therefore, any adjacent land use where an individual could remain for one to eight hours, that is located at a closer distance to the Project site than the receptor used for the 24-hour PM_{10} and $PM_{2.5}$ analysis, must be considered to determine construction and operational LST air impacts for emissions of nitrogen dioxide and carbon monoxide since these pollutants have an averaging time of one and eight hours.

The South Coast AQMD recommends that the nearest sensitive receptor be considered when determining the Project's potential to cause an individual or a cumulatively significant impact. As stated above, the nearest receptor used for evaluation of localized impacts of PM_{10} and $PM_{2.5}$ is represented by location R1, which represents the existing residence at 4063 North Webster Avenue, approximately 94 feet (29 meters) northeast of the Project site. As such, for evaluation of localized PM_{10} and $PM_{2.5}$, a 29-meter distance is used. The nearest receptor used for evaluation of localized emissions of NO_X and carbon monoxide is represented by location R6, which represents the Chevron located at 796 Ramona Expressway, approximately 72 feet (22 meters) east of the Project site.

For this Project, the appropriate SRA for the LST analysis is Perris Valley (SRA 24). Table 4.1-10, *Localized Construction-Source Emissions*, identifies the localized impacts at the nearest receptor location in the vicinity of the Project. All other modeled locations in the study area would experience a lesser concentration and consequently a lesser impact. As shown in Table 4.1-10, localized construction emissions would not exceed the applicable South Coast AQMD LSTs for emissions of any criteria pollutant.

Carbon Monoxide Hot Spots

It has long been recognized that carbon monoxide hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, the South Coast Air Basin is now designated as attainment for its carbon monoxide concentration.

Table 4.1-10
LOCALIZED CONSTRUCTION-SOURCE EMISSIONS

Construction Activity		Emissions (lbs./day)			
		NOx	CO	PM_{10}	$PM_{2.5}$
Site Preparation	Maximum Daily Emissions	14.73	28.31	5.76	2.79
	South Coast AQMD Localized Threshold	220	1,230	13	6
	Threshold Exceeded?	NO	NO	NO	NO
Grading	Maximum Daily Emissions	19.43	35.35	2.85	1.16
	South Coast AQMD Localized Threshold	237	1,346	14	7
	Threshold Exceeded?	NO	NO	NO	NO

Source: Urban Crossroads 2025
NO_x = nitrogen oxides; CO = carbon monoxide; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less

As shown in Table 4.1-11, *Localized Significance Summary of Operations*, operational emissions would not exceed the LST thresholds for the nearest sensitive receptor.

Table 4.1-11
LOCALIZED SIGNIFICANCE SUMMARY OF OPERATIONS

Onsite Emissions	Emissions (lbs./day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**16.84**	**113.17**	**1.05**	**0.41**
South Coast AQMD Localized Threshold	270	1,577	5	2
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: Urban Crossroads 2025

To establish a more accurate record of baseline carbon monoxide concentrations affecting the South Coast Air Basin, a carbon monoxide “hot spot” analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This “hot spot” analysis did not predict any violation of carbon monoxide standards at these intersections, described further below.

Based on the South Coast AQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide, peak carbon monoxide concentrations in the South Coast Air Basin were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, an 8-hour carbon monoxide concentration of 8.4 parts per million (ppm) was measured at the Long Beach Boulevard. and Imperial Highway. intersection (the highest carbon monoxide generating intersection within the “hot spot” analysis), and only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection while the remaining 7.7 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared (South Coast AQMD 2003). In contrast, an adverse carbon monoxide concentration, known as a “hot spot,” would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur.

The ambient 1-hour and 8-hour carbon monoxide concentrations within the Project area are estimated to be 0.9 ppm and 0.8 ppm, respectively (data from Lake Elsinore station for 2021). Therefore, even if

the traffic volumes in the Project area with the proposed Project were ten times the traffic volumes generated at the Long Beach Boulevard. and Imperial Highway. intersection, due to the on-going improvements in ambient air quality and vehicular emissions controls, the Project would not be capable of resulting in a carbon monoxide "hot spot" at any study area intersections.

Similar considerations are also employed by other Air Districts when evaluating potential carbon monoxide concentration impacts. More specifically, the Bay Area Air Quality Management District concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant carbon monoxide impact.

The busiest intersection evaluated for the "hot spot" analysis was that at Wilshire Boulevard and Veteran Avenue, which had AM/PM traffic volumes of 8,062 vehicles per hour and 7,719 vehicles per hour, respectively. The 2003 AQMP estimated that the 1-hour carbon monoxide concentration for this intersection was 4.6 ppm, indicating that, should the daily traffic volume increase four times to 400,000 vehicles per day, carbon monoxide concentrations (4.6 ppm x 4= 18.4 ppm) would still not likely exceed the most stringent 1-hour carbon monoxide standard (20.0 ppm). The highest trips on a Project intersection during AM traffic is 5,838 vehicles per hour, on Perris Boulevard and Ramona Expressway. This includes existing traffic volumes plus the projected traffic volumes of the proposed Project. The highest trips on a Project intersection for the proposed Project during PM traffic is 6,328 vehicles per hour, on Evans Road and Ramona Expressway. As such, traffic volumes with the Project are less than the traffic volumes identified in the 2003 AQMP. The Project would not produce the volume of traffic required to generate a carbon monoxide "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative Bay Area Air Quality Management District carbon monoxide threshold considerations. Therefore, carbon monoxide "hot spots" are not an environmental impact of concern for the Project.

Significance of Impacts

Results of the LST analysis indicate that the Project would not exceed the South Coast AQMD localized significance thresholds during construction or operations. Project traffic would not create or result in a carbon monoxide "hotspot." Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations as the result of Project construction or operations, and no health risk assessment would be required for the project. Impacts to sensitive receptors would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Impacts would be less than significant without mitigation.

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

Impact Analysis

Land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The Project does not propose land uses typically associated with emitting objectionable odors.

Construction Odors

Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction.

Operational Odors

While restaurants may result in some odors from the cooking process, these odors are not typically considered objectionable. With respect to operation of the gas station, gas pumping activities are also expected to generate odors associated with gasoline fumes. The gas pumps and underground storage tanks would include CARB-required vapor recovery systems that would control VOC vapor releases during refueling and would minimize driver and employee exposure to gasoline odors and fumes. Thus, gasoline odors are not expected to adversely affect adjacent land uses. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the solid waste regulations. The proposed Project would also be required to comply with South Coast AQMD Rule 402 to prevent occurrences of public nuisances.

Significance of Impacts

Odors associated with the proposed Project construction and operations would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant without mitigation.

4.1.5 Cumulative Impacts

As discussed in Section 4.1.3, the South Coast AQMD has published a report on how to address cumulative impacts from air pollution, and projects that exceed the project-specific significance thresholds are considered by the South Coast AQMD to result in cumulatively considerable impacts. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

As previously shown in Table 4.1-2, the California Ambient Air Quality Standards designate the South Coast Air Basin as nonattainment for ozone, PM_{10}, and $PM_{2.5}$ while the National Ambient Air Quality Standards designate the South Coast Air Basin as nonattainment for ozone and $PM_{2.5}$.

Construction Impacts

The Project-specific evaluation of emissions presented in the preceding analysis demonstrates that proposed Project construction-source air pollutant emissions would not result in exceedances of regional thresholds. Therefore, proposed Project construction-source emissions would be considered less than significant on a project-specific and cumulative basis.

Operational Impacts

As substantiated in this analysis, Project-level operational-source VOC, NO_X, carbon monoxide, and PM_{10} emissions impacts would be significant and unavoidable. It should be noted that because the South Coast Air Basin is in attainment for carbon monoxide, Project-level operational carbon monoxide would not be considered cumulatively significant. However, per South Coast AQMD guidance, Project operational-source VOC and NOx (the precursors of ozone), and PM_{10} emissions impacts would be cumulatively significant.

4.1.6 References

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4.2 Greenhouse Gas Emissions

This section provides a Project-specific greenhouse gas emissions analysis, consistent with the requirements of the PVCCSP EIR. The analysis contained in this section is based on the Project's *Greenhouse Gas Analysis* (Urban Crossroads 2023), which is contained in Appendix C of this EIR.

Comments relating to the issue of air quality and health risk were provided by the South Coast AQMD in response to the August 2024 Notice of Preparation. The South Coast AQMD recommended that the City use the South Coast AQMD's CEQA Air Quality Handbook and website as guidance when preparing the air quality and greenhouse gas analyses. The South Coast AQMD also requested that the City send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses for their review. There were no comments addressing greenhouse gas emissions raised at the public scoping meeting.

4.2.1 Existing Conditions

4.2.1.1 Global Climate Change

Global climate change refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation, and storms. Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, carbon dioxide (CO_2), nitrous oxide (N_2O), methane (CH_4), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radiative heat from escaping, thus warming the earth's atmosphere. Global climate change can occur naturally as it has in the past with the previous ice ages.

Gases that trap heat in the atmosphere are often referred to as greenhouse gases. Greenhouse gases are released into the atmosphere by both natural and anthropogenic activity. Without the natural greenhouse gas effect, the earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The cumulative accumulation of these gases in the earth's atmosphere is considered to be the cause for the observed increase in the earth's temperature over time.

4.2.1.2 Greenhouse Gases and Health Effects

Greenhouse gases trap heat in the atmosphere, creating a greenhouse effect that results in global warming and climate change. For the purposes of this analysis, emissions of CO_2, methane, and nitrous oxide were evaluated because these gases are the primary contributors to global climate change from development projects. Although other substances such as fluorinated gases also contribute to global climate change, these gases were not evaluated as their sources are not well-defined and models do not contain accepted emissions factors or methodology to accurately calculate these gases.

The potential health effects related directly to the emissions of CO_2, methane, and nitrous oxide as they relate to development projects such as the proposed Project are still being debated in the scientific community. As described further in Section 4.2.1.4 below, their cumulative effects on global climate change have the potential to cause indirect adverse effects to human health. Increases in Earth's ambient temperatures would result in more intense heat waves, causing more heat-related deaths. Scientists also purport those higher ambient temperatures would likely lead to more widespread

disease. Climate change would likely cause shifts in weather patterns, potentially resulting in devastating droughts and food shortages in some areas (American Lung Association 2024).

4.2.1.3 Global Warming Potential

Different greenhouse gases have different global warming potentials and atmospheric lifetimes. The Intergovernmental Panel on Climate Change (IPCC) developed the global warming potential concept to compare the ability of each greenhouse gas to trap heat in the atmosphere relative to another gas. The global warming potential of individual greenhouse gases is determined through comparison with the global warming potential of CO_2., which has a global warming potential of one. Methane, for example, has 28 times the global warming potential of CO_2 and therefore has a global warming potential of 28. CO_2 equivalents (CO_2e) are the emissions of a greenhouse gas multiplied by its global warming potential. The atmospheric lifetimes and global warming potentials of selected greenhouse gases are summarized in Table 4.2-1, *Global Warming Potential and Atmospheric Lifetime of Select Gases*. As shown in the table below from the IPCC's 6th Assessment Report, which assesses global climate change, the global warming potential of the gases evaluated in the IPCC report and discussed in this report in relation to the proposed Project range from 1 for CO_2 to 25,200 for sulfur hexafluoride. The atmospheric lifetimes of these greenhouse gases are up to 3,200 years.

Table 4.2-1
GLOBAL WARMING POTENTIAL AND ATMOSPHERIC LIFETIME OF SELECT GASES

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)	
		2nd Assessment Report	6th Assessment Report
Carbon Dioxide (CO_2)	Multiple	1	1
Methane (CH_4)	11.8	21	28
Nitrous Oxide (N_2O)	109	310	273
Fluroform (HFC-23)	228	11,700	14,600
Tetrafluoroethene (HFC-134a)	14	1,300	1,526
Difluoroethane (HFC-152a)	1.6	140	164
Sulfur Hexafluoride (SF_6)	3,200	23,900	25,200

Source: IPCC Second Assessment Report, 1995 and IPCC Sixth Assessment Report, 2022

4.2.1.4 Effects of Climate Change in California

Public Health

According to the California Energy Commission, higher temperatures may increase the frequency, duration, and intensity of conditions conducive to air pollution formation (California Energy Commission 2006). For example, days with weather conducive to ozone formation could increase from 25 to 35 percent under the lower warming range to 75 to 85 percent under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances, depending on wind conditions. Based on Our Changing Climate Assessing the Risks to California by the California Climate Change Center, large wildfires could become up to 55 percent more frequent if greenhouse gas emissions are not significantly reduced.

In addition, under the higher warming range scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a significant increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures could increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat (California Energy Commission 2006).

Water Resources

A vast network of man-made reservoirs and aqueducts captures and transports water throughout the state from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages.

If temperatures continue to increase, more precipitation could fall as rain instead of snow, and the snow that does fall could melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90 percent. Under the lower warming range scenario, snowpack losses could be only half as large as those possible if temperatures were to rise to the higher warming range. How much snowpack could be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack could pose challenges to water managers and hamper hydropower generation.

The state's water supplies are also at risk from rising sea levels. An influx of saltwater could degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta – a major fresh water supply (California Energy Commission 2006).

Agriculture

Increased temperatures could cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. First, California farmers could possibly face lower water supplies, as described above, and decreased productivity. In addition, continued global climate change could shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants (California Energy Commission 2006).

Forests and Landscapes

Global climate change has the potential to intensify the current threat to forests and landscapes by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55 percent, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors, including precipitation, winds, temperature, and landscape and vegetation conditions, future risks would not be uniform throughout the state. In contrast, wildfires in northern California could increase by up to 90 percent due to decreased precipitation.

Moreover, continued global climate change has the potential to alter natural ecosystems and biological diversity within the state. For example, alpine and subalpine ecosystems could decline by as much as 60

to 80 percent by the end of the century as a result of increasing temperatures. The productivity of the state's forests has the potential to decrease as a result of global climate change (California Energy Commission 2006).

Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures could increasingly threaten the state's coastal regions. Under the higher warming range scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate low-lying coastal areas with saltwater, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats. Under the lower warming range scenario, sea level could rise 12 to 14 inches (California Energy Commission 2006).

4.2.2 Existing Policies and Regulations

4.2.2.1 International

Intergovernmental Panel on Climate Change

In 1988, the United Nations and the World Meteorological Organization established the IPCC to assess the scientific, technical, and socioeconomic information relevant to understanding the scientific basis of risk of human-induced climate change, its potential impacts, and options for adaptation and mitigation.

United Nations Framework Convention on Climate Change

On March 21, 1994, the U.S. joined a number of countries around the world in signing the United Nations Framework Convention on Climate Change (UNFCCC). Under the UNFCCC, governments gather and share information on greenhouse gas emissions, national policies, and best practices; launch national strategies for addressing greenhouse gas emissions and adapting to expected impacts, including the provision of financial and technological support to developing countries; and cooperate in preparing for adaptation to the impacts of climate change.

International Climate Change Treaties

The Kyoto Protocol is an international agreement linked to the UNFCCC. The major feature of the Kyoto Protocol is that it set binding targets for 37 industrialized countries and the European community for reducing greenhouse gas emissions at an average of 5 percent against 1990 levels over the five-year period between 2008 and2012. The Convention (as discussed above) encouraged industrialized countries to stabilize emissions; however, the Protocol commits them to do so. Developed countries have contributed more emissions than less industrialized countries over the last 150 years; therefore, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities."

In 2001, President George W. Bush indicated that he would not submit the treaty to the U.S. Senate for ratification, which effectively ended American involvement in the Kyoto Protocol. In December 2009, international leaders met in Copenhagen to address the future of international climate change commitments post-Kyoto Protocol. No binding agreement was reached in Copenhagen; however, the United Nations Climate Change Committee identified the long-term goal of limiting the maximum global average temperature increase to no more than 2 degrees Celsius (°C) above pre-industrial levels, subject

to a review in 2015. The Committee held additional meetings in Durban, South Africa in November 2011; Doha, Qatar in November 2012; and Warsaw, Poland in November 2013. The meetings gradually gained consensus among participants on individual climate change issues.

On September 23, 2014, more than 100 Heads of State and Government and leaders from the private sector and civil society met at the Climate Summit in New York hosted by the United Nations. At the Summit, heads of government, business and civil society announced actions in areas that would have the greatest impact on reducing emissions, including climate finance, energy, transport, industry, agriculture, cities, forests, and building resilience.

Parties to the UNFCCC reached a landmark agreement on December 12, 2015, in Paris, charting a fundamentally new course in the two-decade-old global climate effort. Culminating a four-year negotiating round, the new treaty ends the strict differentiation between developed and developing countries that characterized earlier efforts, replacing it with a common framework that commits all countries to put forward their best efforts and to strengthen them in the years ahead. This includes, for the first time, requirements that all parties report regularly on their emissions and implementation efforts and undergo international review.

The agreement and a companion decision by parties were the key outcomes of the conference, known as the 21st session of the UNFCCC Conference of the Parties 21. Together, the Paris Agreement and the accompanying Conference of the Parties decision:

- Reaffirm the goal of limiting global temperature increase well below 2°C, while urging efforts to limit the increase to 1.5 degrees;
- Establish binding commitments by all parties to make "nationally determined contributions," and to pursue domestic measures aimed at achieving them;
- Commit all countries to report regularly on their emissions and "progress made in implementing and achieving" their nationally determined contributions, and to undergo international review;
- Commit all countries to submit new nationally determined contributions every five years, with the clear expectation that they would "represent a progression" beyond previous ones;
- Reaffirm the binding obligations of developed countries under the UNFCCC to support the efforts of developing countries, while for the first time encouraging voluntary contributions by developing countries too;
- Extend the current goal of mobilizing $100 billion a year in support by 2020 through 2025, with a new, higher goal to be set for the period after 2025;
- Extend a mechanism to address "loss and damage" resulting from climate change, which explicitly would not "involve or provide a basis for any liability or compensation;"
- Require parties engaging in international emissions trading to avoid "double counting;" and
- Call for a new mechanism, similar to the Clean Development Mechanism under the Kyoto Protocol, enabling emission reductions in one country to be counted toward another

country's nationally determined contributions (Center for Climate and Energy Solutions 2015).

Following President Biden's day one executive order, the U.S. officially rejoined the landmark Paris Agreement on February 19, 2021, positioning the U.S. to once again be part of the global climate solution. Meanwhile, city, state, business, and civic leaders across the country and around the world have been ramping up efforts to drive the clean energy advances needed to meet the goals of the agreement.

4.2.2.2 Federal

Supreme Court Ruling in Massachusetts et al v. Environmental Protection Agency

In *Massachusetts et al. v. Environmental Protection Agency*, decided on April 2, 2007, the United States Supreme Court (Supreme Court) found that four greenhouse gases, including CO_2, are air pollutants subject to regulation under Section 202(a)(1) of the Clean Air Act. The Supreme Court held that the EPA Administrator must determine whether emissions of greenhouse gases from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GREENHOUSE GASs under section 202(a) of the Clean Air Act:

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed greenhouse gases— CO_2, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride—in the atmosphere threaten the public health and welfare of current and future generations.

- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed greenhouse gases from new motor vehicles and new motor vehicle engines contribute to the greenhouse gas pollution, which threatens public health and welfare.

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing greenhouse gas emissions standards for vehicles, as discussed in the section "Clean Vehicle Standards" below. After a lengthy legal challenge, the Supreme Court declined to review an Appeals Court ruling that upheld the U.S. EPA Administrator's findings (EPA 2020).

Clean Vehicle Standards

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

The first phase of the national program applies to passenger cars, light-duty trucks, and medium-duty passenger vehicles, covering model years 2012 through 2016. They require these vehicles to meet an estimated combined average emissions level of 250 grams of CO_2 per mile, equivalent to 35.5 miles per

gallon (mpg) if the automobile industry were to meet this CO_2 level solely through fuel economy improvements. Together, these standards would cut CO_2 emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012–2016). The EPA and the NHTSA issued final rules on a second-phase joint rulemaking establishing national standards for light-duty vehicles for model years 2017 through 2025 in August 2012. The new standards for model years 2017 through 2025 apply to passenger cars, light-duty trucks, and medium-duty passenger vehicles. The final standards are projected to result in an average industry fleetwide level of 163 grams/mile of CO_2 in model year 2025, which is equivalent to 54.5 mpg if achieved exclusively through fuel economy improvements.

The EPA and the U.S. Department of Transportation issued final rules for the first national standards to reduce greenhouse gas emissions and improve fuel efficiency of heavy-duty trucks and buses on September 15, 2011, effective November 14, 2011. For combination tractors, the agencies are proposing engine and vehicle standards that begin in the 2014 model year and achieve up to a 20 percent reduction in CO_2 emissions and fuel consumption by the 2018 model year. For heavy-duty trucks and vans, the agencies are proposing separate gasoline and diesel truck standards, which phase in starting in the 2014 model year and achieve up to a 10 percent reduction for gasoline vehicles and a 15 percent reduction for diesel vehicles by the 2018 model year (12 and 17 percent respectively if accounting for air conditioning leakage). Lastly, for vocational vehicles, the engine and vehicle standards would achieve up to a 10 percent reduction in fuel consumption and CO_2 emissions from the 2014 to 2018 model years.

On April 2, 2018, the EPA signed the Mid-term Evaluation Final Determination, which declared that the model year 2022-2025 greenhouse gas standards are not appropriate and should be revised. This Final Determination serves to initiate a notice to further consider appropriate standards for model years 2022-2025 light-duty vehicles. On August 2,2018, the NHTSA in conjunction with the EPA, released a notice of proposed rulemaking, the *Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks* (SAFE Rule). The SAFE Vehicles Rule was proposed to amend existing CAFE and tailpipe CO_2 standards for passenger cars and light trucks and to establish new standards covering model years 2021 through 2026. As of March 31, 2020, the NHTSA and EPA finalized the SAFE Vehicle Rule which increased stringency of CAFE and CO_2 emissions standards by 1.5 percent each year through model year 2026. In April, the EPA and National Highway Traffic Safety Administration's separately announced proposed rulemakings to repeal the previous administration's light-duty motor vehicle regulations that were part of the "The Safer Affordable Fuel-Efficient Vehicles Rule Part One: One National Program." The comment period has closed, but no additional actions have been taken to date.

On March 31, 2022, NHTSA finalized CAFE standards for model years 2024-2026. The standards for passenger cars and light trucks for model years 2024-2025 were increased at a rate of 8 percent per year and then increased at a rate of 10 percent per year for model year 2026 vehicles. NHTSA currently projects that the revised standards would require an industry fleet-wide average of roughly 49 mpg in model year 2026 and would reduce average fuel outlays over the lifetimes of affected vehicles that provide consumers hundreds of dollars in net savings. These standards are directly responsive to the EPA's statutory mandate to improve energy conservation and reduce the nation's energy dependence on foreign sources.

Mandatory Reporting of Greenhouse Gases

The Consolidated Appropriations Act of 2008, passed in December 2007, requires the establishment of mandatory greenhouse gas reporting requirements. On September 22, 2009, the EPA issued the Final Mandatory Reporting of GHGs [Greenhouse Gases] Rule, which became effective January 1, 2010. The rule requires reporting of greenhouse gas emissions from large sources and suppliers in the U.S. and is intended to collect accurate and timely emissions data to inform future policy decisions. Under the rule, suppliers of fossil fuels or industrial greenhouse gases, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons of CO_2e per year or more of greenhouse gas emissions are required to submit annual reports to the EPA.

New Source Review

The EPA issued a final rule on May 13, 2010, that establishes thresholds for greenhouse gases that define when permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities. This final rule "tailors" the requirements of these Clean Air Act permitting programs to limit which facilities would be required to obtain Prevention of Significant Deterioration and Title V permits. In the preamble to the revisions to the Federal Code of Regulations, the EPA states:

> *"This rulemaking is necessary because without it the Prevention of Significant Deterioration and Title V requirements would apply, as of January 2, 2011, at the 100 or 250 tons per year levels provided under the CAA, greatly increasing the number of required permits, imposing undue costs on small sources, overwhelming the resources of permitting authorities, and severely impairing the functioning of the programs. USEPA is relieving these resource burdens by phasing in the applicability of these programs to GHG sources, starting with the largest GHG emitters. This rule establishes two initial steps of the phase-in. The rule also commits the agency to take certain actions on future steps addressing smaller sources but excludes certain smaller sources from Prevention of Significant Deterioration and Title V permitting for GHG emissions until at least April 30, 2016."*

The EPA estimates that facilities responsible for nearly 70 percent of the national greenhouse gas emissions from stationary sources would be subject to permitting requirements under this rule. This includes the nation's largest greenhouse gas emitters—power plants, refineries, and cement production facilities.

Standards of Performance for Greenhouse Gas Emissions for New Stationary Sources: Electric Utility-Generating Uses

As required by a settlement agreement, the EPA proposed new performance standards for emissions of CO_2 for new, affected, fossil fuel-fired electric utility generating units on March 27, 2012. New sources greater than 25 megawatts would be required to meet an output-based standard of 1,000 pounds of CO_2 per megawatt-hour, based on the performance of widely used natural gas combined cycle technology. It should be noted that on February 9, 2016, the Supreme Court issued a stay of this regulation pending litigation. Additionally, the EPA Administrator signed a measure to repeal the Clean Power Plan, including the CO_2 standards. The Clean Power Plan was officially repealed on June 19, 2019, when the EPA issued the final Affordable Clean Energy rule. Under the Affordable Clean Energy Rule,

new state emission guidelines were established that provided existing coal-fired electric utility generating units with achievable standards.

On January 19, 2021, the D.C. Circuit Court of Appeals ruled that the EPA's Affordable Clean Energy Rule for greenhouse gas emissions from power plants rested on an erroneous interpretation of the Clean Air Act that barred EPA from considering measures beyond those that apply at and to an individual source. The court therefore vacated and remanded the Affordable Clean Energy Rule and adopted a replacement rule which regulates CO_2 emissions from existing power plants, potentially again considering generation shifting and other measures to more aggressively target power sector emissions.

Cap-and-Trade

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

The Regional GHG Initiative is an effort to reduce greenhouse gases among the states of Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont. Each state caps CO_2 emissions from power plants, auctions CO_2 emission allowances, and invests the proceeds in strategic energy programs that further reduce emissions, save consumers money, create jobs, and build a clean energy economy. The Initiative began in 2008 and in 2020 has retained all participating states.

The Western Climate Initiative partner jurisdictions have developed a comprehensive initiative to reduce regional greenhouse gas emissions to 15 percent below 2005 levels by 2020. The partners were originally California, British Columbia, Manitoba, Ontario, and Quebec. However, Manitoba and Ontario are not currently participating. California linked with Quebec's cap-and-trade system January 1, 2014, and joint offset auctions took place in 2015. While the Western Climate Initiative has yet to publish whether it has successfully reached the 2020 emissions goal initiative set in 2007, Senate Bill (SB) 32 requires that California, a major partner in the Western Climate Initiative, adopt the goal of reducing statewide greenhouse gas emissions to 40 percent below the 1990 level by 2030.

Executive Order 13990

On January 20, 2021, Federal agencies were directed to immediately review, and take action to address Federal regulations promulgated and other actions taken during the prior 4 years that conflicted with national objectives to improve public health and the environment; ensure access to clean air and water; limit exposure to dangerous chemicals and pesticides; hold polluters accountable, including those who disproportionately harm communities of color and low-income communities; reduce greenhouse gas emissions; bolster resilience to the impacts of climate change; restore and expand our national treasures and monuments; and prioritize both environmental justice and employment.

4.2.2.3 State

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce greenhouse gases of any state in the nation. Some legislation such as the landmark AB 32 was specifically enacted to address greenhouse gas emissions. Other legislation such as Title 24

and Title 20 energy standards were originally adopted for other purposes such as energy and water conservation but also provide the co-benefit of greenhouse gas reductions. This section describes the major provisions of the legislation.

AB 32

The California State Legislature enacted AB 32, which required that greenhouse gases emitted in California be reduced to 1990 levels by the year 2020 (this goal has been met[1]). Greenhouse gases as defined under AB 32 include CO_2, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Since AB 32 was enacted, a seventh chemical, nitrogen trifluoride, has also been added to the list of greenhouse gases. CARB is the state agency charged with monitoring and regulating sources of greenhouse gases. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emission reductions. AB 32 states the following:

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

SB 375

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

SB 375 requires metropolitan planning organizations to prepare a Sustainable Communities Strategy within the Regional Transportation Plan that guides growth while considering the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage transit-oriented residential projects, which help achieve AB 32 goals to reduce greenhouse gas emissions. Although SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.

Concerning CEQA, SB 375, as codified in Public Resources Code Section 21159.28, states that CEQA findings for certain projects are not required to reference, describe, or discuss (1) growth inducing

[1] Based upon the 2019 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2017 GHG emissions period, California emitted an average 424.1 million metric tons CO_2e. This is less than the 2020 emissions target of 431 million metric tons CO_2e.

impacts, or (2) any project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network, if the project:

- Is in an area with an approved sustainable communities strategy or an alternative planning strategy that CARB accepts as achieving the greenhouse gas emission reduction targets.
- Is consistent with that strategy (in designation, density, building intensity, and applicable policies).
- Incorporates the mitigation measures required by an applicable prior environmental document.

AB 1493 - Pavley Fuel Efficiency Standards

Enacted on July 22, 2002, California AB 1493, also known as the Pavley Fuel Efficiency Standards, required CARB to develop and adopt regulations that reduce greenhouse gases emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the EPA's denial of an implementation waiver. The EPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011.

The standards phased in during the 2009 through 2016 model years. Several technologies stand out as providing significant reductions in emissions at favorable costs. These include discrete variable valve lift or camless valve actuation to optimize valve operation rather than relying on fixed valve timing and lift as has historically been done; turbocharging to boost power and allow for engine downsizing; improved multi-speed transmissions; and improved air conditioning systems that operate optimally, leak less, and/or use an alternative refrigerant.

The second phase of the implementation for the Pavley bill was incorporated into Amendments to the Low-Emission Vehicle Program or the Advanced Clean Cars program. The Advanced Clean Cars program combines the control of smog-causing pollutants and greenhouse gas emissions into a single coordinated package of requirements for model years 2017 through 2025. The regulation would reduce greenhouse gases from new cars by 34 percent from 2016 levels by 2025. The new rules would clean up gasoline and diesel-powered cars, and deliver increasing numbers of zero-emission technologies, such as full battery electric cars, newly emerging plug-in hybrid EVs and hydrogen fuel cell cars. The package would also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California.

Clean Energy and Pollution Reduction Act of 2015

In October 2015, the legislature approved, and Governor Jerry Brown signed SB 350, which reaffirms California's commitment to reducing its greenhouse gas emissions and addressing climate change. Key provisions include an increase in the Renewable Portfolio Standard, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for EV charging stations. Provisions for a 50 percent reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide greenhouse gas emissions:

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.

- Double the energy efficiency in existing buildings by 2030. This target would be achieved through the California Public Utilities Commission, the California Energy Commission, and local publicly owned utilities.

- Reorganize the Independent System Operator to develop more regional electrify transmission markets and to improve accessibility in these markets, which would facilitate the growth of renewable energy markets in the western United States.

SB 32

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

2017 CARB Scoping Plan

In November 2017, CARB released the Final 2017 Scoping Plan Update (2017 Scoping Plan), which identifies the state's post-2020 reduction strategy. The 2017 Scoping Plan reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard (LCFS), and much cleaner cars, trucks, and freight movement, utilizing cleaner, renewable energy, and strategies to reduce methane emissions from agricultural and other wastes.

The 2017 Scoping Plan establishes a new emissions limit of 260 million metric tons of CO_2e for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

California's climate strategy would require contributions from all sectors of the economy, including the land base, and would include enhanced focus on zero and near-zero emission vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (methane, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct greenhouse gas reductions at refineries would further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the 2017 Scoping Plan framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing zero-emission vehicles (ZEV) buses and trucks.
- LCFS, with an increased stringency (18 percent by 2030).

- Implementing SB 350, which expands the Renewable Portfolio Standard to 50 percent and doubles energy efficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy, which focuses on reducing methane and HCF emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by year 2030.
- Continued implementation of SB 375.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- 20 percent reduction in greenhouse gas emissions from refineries by 2030.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

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

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

In addition to the statewide strategies listed above, the 2017 Scoping Plan also identifies local governments as essential partners in achieving the state's long-term greenhouse gas reduction goals and identifies local actions to reduce greenhouse gas emissions. As part of the recommended actions, CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 metric tons of CO_2e ($MTCO_2e$) or less per capita by 2030 and 2 $MTCO_2e$ or less per capita by 2050. For CEQA projects, CARB states that lead agencies may develop evidence-based bright-line numeric thresholds—consistent with the 2017 Scoping Plan and the state's long-term greenhouse gas goals—and projects with emissions over that amount may be required to incorporate onsite design features and MMs that avoid or minimize project emissions to the degree feasible; or a performance-based metric using a climate action plan (CAP) or other plan to reduce greenhouse gas emissions is appropriate.

According to research conducted by the Lawrence Berkeley National Laboratory (LBNL) and supported by CARB, California, under its existing and proposed greenhouse gas reduction policies, could achieve the 2030 goals under SB 32. The research utilized a new, validated model known as the California LBNL greenhouse gas Analysis of Policies Spreadsheet (CALGAPS), which simulates greenhouse gas and criteria pollutant emissions in California from 2010 to 2050 in accordance to existing and future greenhouse gas-reducing policies. The CALGAPS model showed that by 2030, emissions could range from 211 to 428 $MTCO_2e$ per year, indicating that "even if all modeled policies are not implemented, reductions could be sufficient to reduce emissions 40 percent below the 1990 level [of SB 32]." CALGAPS analyzed emissions through 2050 even though it did not generally account for policies that might be put in place after 2030. Although the research indicated that the emissions would not meet the state's 80 percent reduction goal by 2050, various combinations of policies could allow California's cumulative emissions to remain very low through 2050.

2022 CARB Scoping Plan

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan; CARB 2022). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce greenhouse gas emissions by 85 percent below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local greenhouse gas reduction strategy (CAP) consistent with State CEQA Guidelines section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation - the regulations that will impact this sector are adopted and enforced by CARB on vehicle manufacturers and outside the jurisdiction and control of local governments. As stated in the Plan's executive summary:

> "The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on, and accelerating carbon reduction programs that have been in place for a decade and a half. That means rapidly moving to zero-emission transportation; electrifying the cars, buses, trains, and trucks that now constitute California's single largest source of planet-warming pollution."
>
> "[A]pproval of this plan catalyzes a number of efforts, including the development of new regulations as well as amendments to strengthen regulations and programs already in place, not just at CARB but across state agencies."

Under the 2022 Scoping Plan, the state will lead efforts to meet the 2045 carbon neutrality goal through implementation of the following objectives:

- Reimagine roadway projects that increase vehicle miles traveled (VMT) in a way that meets community needs and reduces the need to drive.
- Double local transit capacity and service frequencies by 2030.
- Complete the High-Speed Rail System and other elements of the intercity rail network by 2040.
- Expand and complete planned networks of high-quality active transportation infrastructure.
- Increase availability and affordability of bikes, e-bikes, scooters, and other alternatives to light-duty vehicles, prioritizing needs of underserved communities.
- Shift revenue generation for transportation projects away from the gas tax into more durable sources by 2030.
- Authorize and implement roadway pricing strategies and reallocate revenues to equitably improve transit, bicycling, and other sustainable transportation choices.

- Prioritize addressing key transit bottlenecks and other infrastructure investments to improve transit operational efficiency over investments that increase VMT.
- Develop and implement a statewide transportation demand management (TDM) framework with VMT mitigation requirements for large employers and large developments.
- Prevent uncontrolled growth of autonomous vehicle VMT, particularly zero-passenger miles.
- Channel new mobility services towards pooled use models, transit complementarity, and lower VMT outcomes.
- Establish an integrated statewide system for trip planning, booking, payment, and user accounts that enables efficient and equitable multimodal systems.
- Provide financial support for low-income and disadvantaged Californians' use of transit and new mobility services.
- Expand universal design features for new mobility services.
- Accelerate infill development in existing transportation-efficient places and deploy strategic resources to create more transportation-efficient locations.
- Encourage alignment in land use, housing, transportation, and conservation planning in adopted regional plans (Regional Transportation Plan/Sustainable Communities Strategy and Regional Housing Needs Assessment) and local plans (e.g., general plans, zoning, and local transportation plans).
- Accelerate production of affordable housing in forms and locations that reduce VMT and affirmatively further fair housing policy objectives.
- Reduce or eliminate parking requirements (and/or enact parking maximums, as appropriate) and promote redevelopment of excess parking, especially in infill locations.
- Preserve and protect existing affordable housing stock and protect existing residents and businesses from displacement and climate risk.

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce greenhouse gases and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the state's Climate Goals in CEQA greenhouse gas analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects, in fact CARB states in Appendix D (page 4): "…focuses primarily on CAPs and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting."

Additionally on Page 21 in Appendix D, CARB states: "The recommendations outlined in this section apply only to residential and mixed-use development project types. California currently faces both a housing crisis and a climate crisis, which necessitates prioritizing recommendations for residential

projects to address the housing crisis in a manner that simultaneously supports the state's greenhouse gas and regional air quality goals. CARB plans to continue to explore new approaches for other land use types in the future." As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development.

Cap-and-Trade Program

The 2022 Scoping Plan identifies a Cap-and-Trade Program as one of the key strategies for California to reduce greenhouse gas emissions. According to CARB, a cap-and-trade program would help put California on the path to meet its goal of achieving a 40 percent reduction in greenhouse gas emissions from 1990 levels by 2030. Under cap-and-trade, an overall limit on greenhouse gas emissions from capped sectors is established, and facilities subject to the cap would be able to trade permits to emit greenhouse gases within the overall limit.

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce greenhouse gas emissions from regulated entities by more than 16 percent between 2013 and 2020, and by an additional 40 percent by 2030. The statewide cap for greenhouse gas emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and would decline over time, achieving greenhouse gas emission reductions throughout the program's duration.

Covered entities that emit more than 25,000 $MTCO_2e$ per year must comply with the Cap-and-Trade Program. Triggering of the 25,000 $MTCO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of GHG Emissions (Mandatory Reporting Rule).

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender "compliance instruments" for each $MTCO_2e$ of greenhouse gas they emit. There also are requirements to surrender compliance instruments covering 30 percent of the prior year's compliance obligation by November of each year.

The Cap-and-Trade Program provides a firm cap, which provides the highest certainty of achieving the 2030 target. An inherent feature of the Cap-and-Trade program is that it does not guarantee greenhouse gas emissions reductions in any discrete location or by any particular source. Rather, greenhouse gas emissions reductions are only guaranteed on an accumulative basis. As summarized by CARB in the First Update to the Climate Change Scoping Plan:

> *"The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced. In other words, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program if there is a reduction in GHG emissions from other covered entities.*

Such a focus on aggregate GHG emissions is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative."

The Cap-and-Trade Program covers approximately 80 percent of California's greenhouse gas emissions. The Cap-and-Trade Program covers the greenhouse gas emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, greenhouse gas emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. The Cap-and-Trade Program covers the greenhouse gas emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported.

The Sustainable Communities and Climate Protection Act of 2008 (SB 375)

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

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

1. Is in an area with an approved sustainable communities strategy or an alternative planning strategy that the CARB accepts as achieving the greenhouse gas emission reduction targets.

2. Is consistent with that strategy (in designation, density, building intensity, and applicable policies).

3. Incorporates the mitigation measures required by an applicable prior environmental document.

AB 1493

California AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce greenhouse gases emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the EPA's denial of an implementation waiver. The EPA subsequently granted the requested waiver in 2009, which was upheld by the U.S. District Court for the District of Columbia in 2011.

The standards phase in during the 2009 through 2016 model years. When fully phased in, the near-term (2009–2012) standards will result in about a 22 percent reduction compared with the 2002 fleet, and the mid-term (2013–2016) standards will result in about a 30 percent reduction. Several technologies stand out as providing significant reductions in emissions at favorable costs. These include discrete

variable valve lift or camless valve actuation to optimize valve operation rather than relying on fixed valve timing and lift as has historically been done; turbocharging to boost power and allow for engine downsizing; improved multi-speed transmissions; and improved air conditioning systems that operate optimally, leak less, and/or use an alternative refrigerant.

The second phase of the implementation for the Pavley bill was incorporated into Amendments to the Low-Emission Vehicle Program or the Advanced Clean Cars program. The Advanced Clean Car program combines the control of smog-causing pollutants and greenhouse gas emissions into a single coordinated package of requirements for model years 2017 through 2025. The regulation will reduce greenhouse gases from new cars by 34 percent from 2016 levels by 2025. The new rules will clean up gasoline and diesel-powered cars, and deliver increasing numbers of zero-emission technologies, such as full battery electric cars, newly emerging plug-in hybrid EVs and hydrogen fuel cell cars. The package will also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California.

Clean Energy and Pollution Reduction Act of 2015 (SB 350)

In October 2015, the legislature approved, and the Governor signed SB 350, which reaffirms California's commitment to reducing its greenhouse gas emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for EV charging stations. Provisions for a 50 percent reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide greenhouse gas emissions:

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.

- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utilities Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.

- Reorganize the Independent System Operator to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

Executive Orders Related to GHG Emissions

California's Executive Branch has taken several actions to reduce greenhouse gases through the use of Executive Orders. Although not regulatory, they set the tone for the state and guide the actions of state agencies.

Executive Order B-55-18

Executive Order B-55-18 was signed by Governor Brown on September 10, 2018. The order establishes an additional statewide policy to achieve carbon neutrality by 2045 and maintain net negative emissions thereafter. As per Executive Order B-55-18, CARB is directed to work with relevant state agencies to develop a framework for implementation and accounting that tracks progress toward this goal and to

ensure future Climate Change Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.

Executive Order S-3-05

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

- By 2010, reduce greenhouse gas emissions to 2000 levels.
- By 2020, reduce greenhouse gas emissions to 1990 levels.
- By 2050, reduce greenhouse gas emissions to 80 percent below 1990 levels.

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

Executive Order S-01-07 (LCFS)

Governor Schwarzenegger signed Executive Order S-01-07 on January 18, 2007. The order mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. CARB adopted the LCFS on April 23, 2009.

The LCFS was challenged in the U.S. District Court in Fresno in 2011. The court's ruling issued on December 29, 2011, included a preliminary injunction against CARB's implementation of the rule. The Ninth Circuit Court of Appeals stayed the injunction on April 23, 2012, pending final ruling on appeal, allowing CARB to continue to implement and enforce the regulation. The Ninth Circuit Court's decision, filed September 18, 2013, vacated the preliminary injunction. In essence, the court held that LCFS adopted by CARB were not in conflict with federal law. On August 8, 2013, the Fifth District Court of Appeal (California) ruled CARB failed to comply with CEQA and the Administrative Procedure Act when adopting regulations for LCFS. In a partially published opinion, the Court of Appeal reversed the trial court's judgment and directed issuance of a writ of mandate setting aside Resolution 09-31 and two executive orders of CARB approving LCFS regulations promulgated to reduce greenhouse gas emissions. However, the court tailored its remedy to protect the public interest by allowing the LCFS regulations to remain operative while CARB complies with the procedural requirements it failed to satisfy.

To address the Court ruling, CARB was required to bring a new LCFS regulation to the Board for consideration in February 2015. The proposed LCFS regulation was required to contain revisions to the 2010 LCFS as well as new provisions designed to foster investments in the production of the low-carbon intensity fuels, offer additional flexibility to regulated parties, update critical technical information, simplify, and streamline program operations, and enhance enforcement. On November 16, 2015, the Office of Administrative Law approved the Final Rulemaking Package. The new LCFS regulation became effective on January 1, 2016.

In 2018, CARB approved amendments to the regulation, which included strengthening the carbon intensity benchmarks through 2030 in compliance with the SB 32 greenhouse gas emissions reduction target for 2030. The amendments included crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector.

Executive Order S-13-08

Executive Order S-13-08 states that "climate change in California during the next century is expected to shift precipitation patterns, accelerate sea level rise and increase temperatures, thereby posing a serious threat to California's economy, to the health and welfare of its population and to its natural resources." Pursuant to the requirements in the Order, the 2009 California Climate Adaptation Strategy was adopted, which is the "…first statewide, multi-sector, region-specific, and information-based climate change adaptation strategy in the United States." Objectives include analyzing risks of climate change in California, identifying, and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order B-30-15

On April 29, 2015, Governor Brown issued an executive order to establish a California greenhouse gas reduction target of 40 percent below 1990 levels by 2030. The Governor's executive order aligned California's greenhouse gas reduction targets with those of leading international governments ahead of the United Nations. Climate Change Conference in Paris late 2015. The Order sets a new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050 and directs CARB to update the *2017 Scoping Plan* to express the 2030 target in terms of million metric tons of CO_2e. The Order also requires the state's climate adaptation plan to be updated every three years, and for the state to continue its climate change research program, among other provisions. As with Executive Order S-3-05, this Order is not legally enforceable as to local governments and the private sector. Legislation that would update AB 32 to make post 2020 targets and requirements a mandate is in process in the State Legislature.

California Regulations and Building Codes

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California's energy consumption relatively flat even with rapid population growth.

Title 20 CCR Sections 1601 et seq. – Appliance Efficiency Regulations

The Appliance Efficiency Regulations regulate the sale of appliances in California. The Appliance Efficiency Regulations include standards for both federally regulated appliances and non-federally regulated appliances. 23 categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state and those designed and sold exclusively for use in recreational vehicles or other mobile equipment (CEC 2024).

Title 24 CCR Part 6 – California Energy Code

The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption.

The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods.

Title 24 CCR Part 11 – California Green Building Standards Code

CCR Title 24 Part 6: The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption.

The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission.

CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective on January 1, 2023. The CEC anticipates that the 2022 energy code will provide $1.5 billion in consumer benefits and reduce greenhouse gas emissions by 10 million metric tons. The Project would be required to comply with the applicable standards in place at the time building permit document submittals are made. These require, among other items:

Nonresidential Mandatory Measures

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5 percent of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).

- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5 percent of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).

- Designated parking for clean air vehicles. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).

- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.

- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).

- Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section

    - 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).

- Excavated soil and land clearing debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).

- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).

- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:

    - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)

    - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor- mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).

    - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combined flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).

    - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).

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

- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 square feet or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).

- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 square feet. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 square feet requiring a building or landscape permit (5.304.3).

- Commissioning. For new buildings 10,000 square feet and over, building commissioning shall be included in the design and construction processes of the building project to verify that the

building systems and components meet the owner's or owner representative's project requirements (5.410.2).

Model Water Efficient Landscape Ordinance

The Model Water Efficient Landscape Ordinance was required by AB 1881, the Water Conservation Act. The bill required local agencies to adopt a local landscape ordinance at least as effective in conserving water as the Model Ordinance by January 1, 2010. Governor Brown's Drought Executive Order of April 1, 2015 (Executive Order B-29-15) directed the Department of Water Resources to update the Ordinance through expedited regulation. The California Water Commission approved the revised Ordinance on July 15, 2015, effective December 15, 2015. New development projects that include landscape areas of 500 square feet or more are subject to the Ordinance. The update requires:

- More efficient irrigation systems;
- Incentives for graywater usage;
- Improvements in onsite stormwater capture;
- Limiting the portion of landscapes that can be planted with high water use plants; and
- Reporting requirements for local agencies.

CARB Refrigerant Management Program

CARB adopted a regulation in 2009 to reduce refrigerant greenhouse gas emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is set forth in sections 95380 to 95398 of Title 17, CCR. The rules implementing the regulation establish a limit on statewide greenhouse gas emissions from stationary facilities with refrigeration systems with more than 50 pounds of a high global warming potential refrigerant. The refrigerant management program is designed to (1) reduce emissions of high-global warming potential greenhouse gas refrigerants from leaky stationary, non-residential refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-global warming potential refrigerants; and (3) verify greenhouse gas emission reductions.

SB 97 and the State CEQA Guidelines Update

Passed in August 2007, SB 97 added Section 21083.05 to the Public Resources Code. The code states "(a) On or before July 1, 2009, the Office of Planning and Research shall prepare, develop, and transmit to the Resources Agency guidelines for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption. (b) On or before January 1, 2010, the Resources Agency shall certify and adopt guidelines prepared and developed by the Office of Planning and Research pursuant to subdivision (a)."

In 2012, Public Resources Code Section 21083.05 was amended to state:

> *"The Office of Planning and Research and the Natural Resources Agency shall periodically update the guidelines for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions as required by this division, including, but not limited to, effects associated with transportation or energy consumption, to incorporate new information or criteria established by the State Air Resources Board pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code."*

On December 28, 2018, the Natural Resources Agency approved the amendments to the *State CEQA Guidelines*. The CEQA Amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of greenhouse gas emissions in CEQA documents. The CEQA Amendments fit within the existing CEQA framework by amending existing State CEQA Guidelines to reference climate change.

Section 15064.4 was added the State CEQA Guidelines and states that in determining the significance of a project's 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. A project's incremental contribution may be cumulatively considerable even if it appears relatively insignificant compared to statewide, national, or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. Additionally, a Lead Agency may use a model or methodology to estimate greenhouse gas emissions resulting from a project. The Lead Agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The Lead Agency must support its selection of a model or methodology with substantial evidence. The Lead Agency should explain the limitations of the particular model or methodology selected for use.

California Renewables Portfolio Standard Program (SB 100)

Under the existing Renewables Portfolio Standard, 25 percent of retail sales are required to be from renewable sources by December 31, 2016, 33 percent by December 31, 2020, 40 percent by December 31, 2024, 45 percent by December 31, 2027, and 50 percent by December 31, 2030. SB 100 raises California's RPS requirement to 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also requires retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. In addition to targets under AB 32 and SB 32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency, CalEPA, the Department of Food and Agriculture, and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

4.2.2.4 Regional

The project is within the South Coast Air Basin, which is under the jurisdiction of the South Coast AQMD.

South Coast AQMD

The South Coast AQMD is the agency responsible for air quality planning and regulation in the South Coast Air Basin. The South Coast AQMD addresses the impacts to climate change of projects subject to South Coast AQMD permit as a Lead Agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The South Coast AQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to greenhouse gas emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address greenhouse gas emissions.

In 2008, the South Coast AQMD formed a Working Group to identify greenhouse gas emissions thresholds for land use projects that could be used by local lead agencies in the South Coast Air Basin. In December 2008, the South Coast AQMD Governing Board 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 Working Group has also developed several different options that are contained in the South Coast AQMD Draft Guidance Document – Interim CEQA GHG Significance Threshold, which could be considered for residential and general development projects. The most recent proposal issued in September 2010 uses the following tiered approach to evaluate potential greenhouse gas impacts from various uses. however, the Guidance Document provides substantial evidence supporting the approaches to significance of greenhouse gas emissions that can be considered by the Lead Agency in adopting its own threshold. The current interim thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.

- Tier 2 consists of determining whether the project is consistent with a greenhouse gas reduction plan. If a project is consistent with a qualifying local greenhouse gas reduction plan, it does not have significant greenhouse gas emissions.

- Tier 3 consists of screening values, which the Lead Agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:

    - Industrial land use: 10,000 $MTCO_2e$ per year

    - Option 1: Based on land use type: residential: 3,500 $MTCO_2e$ per year; commercial: 1,400 $MTCO_2e$ per year; or mixed use: 3,000 $MTCO_2e$ per year

    - Option 2: Residential and commercial land use: 3,000 $MTCO_2e$ per year

- Tier 4 has the following options:

    - Option 1: Reduce Business-as-Usual emissions by a certain percentage; this percentage is currently undefined.

    - Option 2: Early implementation of applicable AB 32 Scoping Plan measures

  - Option 3: 2020 target for service populations, which includes residents and employees: 4.8 $MTCO_2e$ per service population per year for projects and 6.6 $MTCO_2e$ per service population per year for plans;

  - Option 3, 2035 target: 3.0 $MTCO_2e$ per service population per year for projects and 4.1 $MTCO_2e$ per service population per year for plans

- Tier 5 involves mitigation offsets to achieve target significance threshold.

The South Coast AQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO_2 concentrations at 450 ppm, thus stabilizing global climate.

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 greenhouse gas emissions thresholds since 2010 is that the 10,000 MT CO_2e/yr 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 MT CO_2e/yr threshold for industrial projects and the draft thresholds for non-industrial projects the purpose of evaluating the greenhouse gas emissions impacts associated with proposed general development projects.

The South Coast AQMD only has authority over greenhouse gas emissions from development projects that include air quality permits. If the Project requires a stationary permit, it would be subject to the applicable South Coast AQMD regulations.

South Coast AQMD Regulation XXVII, adopted in 2009 includes the following rules:

- Rule 2700 defines terms and post global warming potentials.

- Rule 2701, SoCal Climate Solutions Exchange, establishes a voluntary program to encourage, quantify, and certify voluntary, high quality certified greenhouse gas emission reductions in the South Coast AQMD.

- Rule 2702, GHG Reduction Program created a program to produce greenhouse gas emission reductions within the South Coast AQMD. The South Coast AQMD would fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

The South Coast AQMD is the agency responsible for air quality planning and regulation in the South Coast Air Basin. The South Coast AQMD addresses the impacts to climate change of projects subject to South Coast AQMD permit as a Lead Agency if they are the only agency having discretionary approval for the project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The South Coast AQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to greenhouse gas emissions, so the agency helps local land use

agencies through the development of models and emission thresholds that can be used to address greenhouse gas emissions.

4.2.2.5 Local

City of Perris Climate Action Plan

The City of Perris CAP was adopted by the City Council (Resolution Number 4966) on February 23, 2016. The CAP was developed to address global climate change through the reduction of harmful greenhouse gas emissions at the community level, and as part of California's mandated statewide greenhouse gas emissions reduction goals under AB 32. Perris's CAP, including the greenhouse gas inventories and forecasts contained within, is based on the Western Riverside Council of Governments' (WRCOG's) Subregional CAP. The Perris CAP utilized WRCOG's analysis of existing greenhouse gas reduction programs and policies that have already been implemented in the subregion and applicable best practices from other regions to assist in meeting the 2020 subregional reduction target. The CAP reduction measures chosen for the City's CAP were based on their greenhouse gas reduction potential, cost-benefit characteristics, funding availability, and feasibility of implementation in the City. The CAP used an inventory base year of 2010 and included emissions from the following sectors: residential energy, commercial/industrial energy, transportation, waste, and wastewater. The CAP's 2020 reduction target is 15 percent below 2010 levels, and the 2035 reduction target is 47.5 percent below 2010 levels. The City is expected to meet these reduction targets through implementation of statewide and local measures. Beyond 2020, Executive Order S-03-05 calls for a reduction of greenhouse gas emissions to a level 80 percent below 1990 levels by 2050.

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The Project site is located within the PVCC area of the City of Perris. As such, and unless otherwise noted, the Project is required to comply with the following applicable PVCCSP EIR mitigation measures. The applicable PVCCSP EIR mitigation measures for greenhouse gases are shown below and are required for the Project. Additionally, these select measures, as disclosed in the PVCCSP EIR, would also reduce greenhouse gas emissions. MM Air 18 has already been fulfilled through coordination with the RTA. As a conservative measure, to provide a worst-case disclosure of the Project's impacts, no reduction in emissions has been assumed from the following PVCCSP EIR mitigation measures in the impact analysis provided in Section 4.2.5.

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

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

MM Air 6 The developer of each implementing development project shall require, by contract specifications, the use of alternative fueled off-road construction equipment, the use of construction equipment that demonstrates early compliance with off-road equipment with the CARB in-use off-road diesel vehicle regulation (South Coast AQMD Rule 2449) and/or meets or exceeds Tier 3 standards with available CARB verified or EPA certified technologies. Diesel equipment shall use water emulsified diesel fuel such as PuriNOX unless it is unavailable in Riverside County at the time of project construction activities.

Contract specifications shall be included in project construction documents, which shall be reviewed by the City of Perris' Building Division prior to issuance of a grading permit.

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

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

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

4.2.3 Thresholds of Significance

According to Appendix G of the State CEQA Guidelines, a significant greenhouse gas impact would occur if implementation of the proposed project would:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The City has not adopted its own numeric threshold of significance for determining impacts with respect to greenhouse gas emissions. A screening threshold of 3,000 $MTCO_2e$ per year to determine if additional analysis is required is an acceptable approach for small projects. This approach is a widely accepted screening threshold used by the City and numerous cities in the South Coast Air Basin based on the South Coast AQMD staff's proposed greenhouse gas screening threshold for stationary source emissions for non-industrial projects, as described in the South Coast AQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans (South Coast AQMD Interim GHG Threshold). Thus, if a non-industrial project would emit greenhouse gases less than 3,000 $MTCO_2e$ per year, the project is not considered a substantial greenhouse gas emitter and the greenhouse gas impact is considered less than significant, requiring no additional analysis and no mitigation. On the other hand, if a non-industrial project would emit greenhouse gases in excess of 3,000 $MTCO_2e$ per year, then the project could be considered a substantial greenhouse gas emitter, requiring additional analysis and potential mitigation. The screening threshold of 3,000 $MTCO_2e$ per year is an acceptable approach for small projects to determine if additional analysis is required and is therefore applied for this Project.

Regarding consistency with greenhouse gas reduction plans and policies, pursuant to Section 15064.4 of the State CEQA Guidelines, a Lead Agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from greenhouse gas emissions. The Project's consistency with the 2022 Scoping Plan, the most applicable GHG reduction plan, is qualitatively discussed for the purpose of this analysis.

4.2.4 Environmental Impacts

Threshold a:	*Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Impact Analysis

As discussed in the Greenhouse Gas Analysis for this project (Appendix C), greenhouse gas emissions would result from construction and operation of the proposed Project. Construction emissions are quantified and amortized over the life of the Project, which is assumed to be 30 years for this analysis. The amortized annual construction emissions are added to the annual operational phase greenhouse gas emissions to reach the total annual greenhouse gas emissions associated with the Project. As shown in Table 4.2-2, Project Greenhouse Gas Emissions, the Project would result in the emissions of approximately 852.45 $MTCO_2e$ per year from construction, energy, water usage, waste, and refrigerants. In addition, the Project has the potential to result in an additional 24,177.00 $MTCO_2e$ per year from mobile sources if the assumption is made that all of the vehicle trips to and from the Project are "new" trips resulting from the development of the Project. As such, the Project has the potential to generate a total of approximately 25,029.45 $MTCO_2e$ per year, as shown in Table 4.2-2. These emissions would exceed the 3,000 $MTCO_2e$ per year threshold of significance used for this analysis.

Table 4.2-2
PROJECT GREENHOUSE GAS EMISSIONS

Emission Source	Emissions (MT per year)				
	CO_2	CH_4	N_2O	R	Total CO_2e
Annual construction-related emissions amortized over 30 years	30.35	1.16E-03	8.57E-04	1.17E-02	30.64
Mobile	23,779.81	0.97	1.13	37.71	24,177.00
Area	2.56	0.00	0.00	0.00	2.57
Energy	571.33	0.05	0.00	0.00	573.78
Water	43.97	1.03	0.02	0.00	77.26
Waste	41.46	4.14	0.00	0.00	145.06
Refrigerants	0.00	0.00	0.00	23.13	23.13
Total CO_2e (All Sources)	**25,029.45**				

Significance of Impacts

The Project would exceed the 3,000 $MTCO_2e$ per year threshold of significance and would therefore result in a potentially significant impact with respect to greenhouse gas emissions.

Mitigation Measures

The Project would implement PVCCSP mitigation measures MM Air 4 through MM Air 7, MM Air 14, and MM Air 18 through MM Air 20. However, the vast majority of the emissions would be generated by mobile sources and neither the City nor the Project applicant have regulatory authority to control mobile source (tailpipe) emissions. No feasible mitigation measures beyond the PVCCSP EIR measures identified above exist that would reduce greenhouse gas emissions to levels that are less than significant.

Level of Significance After Mitigation

Impacts would be significant and unavoidable.

Threshold b: *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Impact Analysis

As previously stated, pursuant to Section 15064.4 of the State CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from greenhouse gas emissions. As such, the Project's consistency with the 2022 Scoping Plan is discussed below. It should be noted that the Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 and 2017 Scoping Plan is not necessary since both of these plans have been superseded by the 2022 Scoping Plan.

2022 Scoping Plan Consistency

The Project would not impede the state's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory

requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the Project will comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the LCFS. Further, the Project will implement PVCCSP EIR mitigation measures MM Air 4 through MM Air 7, MM Air 14, and MM Air 18 through MM Air 20, which are discreet mitigation measures aimed at reducing greenhouse gas emissions. As noted in the analysis herein, compliance with these mitigation measures would ensure that the Project would be consistent with the Perris CAP.

Additionally, the PVCCSP EIR mitigation measures MM Air 14 and MM Air 18 through MM Air 20 would further reduce Project greenhouse gas emissions and VMT, including increased implementation and availability of vehicle and equipment electrification and optimization of vehicle access and activity. Upon coordination with the RTA, as required by PVCCSP EIR mitigation measure MM Air 18, the Project design was modified to include a curb cut between Project Driveways 3 and 4 to accommodate a future bus stop. PVCCSP EIR Mitigation measure MM Air 18 has therefore been fulfilled. The Project would result in a less than significant VMT impact as further discussed in the Project-specific VMT analysis (refer to Section 7.1.15). As such, the Project would be consistent with the 2022 Scoping Plan.

Consistency with the City's CAP

The City adopted its CAP in February 2016. The measures identified in the CAP represent the City's actions to achieve the greenhouse gas reduction targets of AB 32 for target year 2020. Local measures incorporated in the CAP include:

- Energy measure that directs the City to create an energy action plan to reduce energy consumption citywide;
- Land use and transportation measures that encourage alternative modes of transportation (walking, biking, and transit), reduce motor vehicle use by allowing a reduction in parking supply, voluntary transportation demand management to reduce vehicle miles traveled, and land use strategies that improve jobs-housing balance (increased density and mixed-use); and
- Solid waste measures that reduce landfilled solid waste in the City.

The PVCCSP EIR mitigation measures listed in Section 4.2.2.5 require the Project to implement features to reduce energy consumption, increase energy efficiency, and encourage alternative methods of transportation. These actions would contribute to compliance with the CAP by reducing the Project's construction and operational emissions. The Project would comply with the CAP through compliance with the PVCCSP EIR mitigation measures identified previously, and the Project would not conflict with local strategies and state/regional strategies listed in the Perris CAP.

Further, the Project is subject to California Building Code requirements. New buildings must meet the applicable building code requirements and standards in place at the time building permit documentation submittals are made. The CALGreen Code is updated on a regular basis, with the most recent approved 2022 CALGreen Code effective on January 1, 2023. As construction of the Project is anticipated to be completed in 2026, it is presumed that the Project would be required to comply with

the Title 24 standards in place at that time. While the Project does not include reduced parking, or increased density, it would provide sidewalks, bike racks, pedestrian walkways, a bus stop, and TDM measures to encourage the use of alternative modes of transportation (walking, biking, and transit). As such, the Project would not conflict with applicable greenhouse gas reduction measures in the CAP.

Significance of Impacts

The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases, and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant without mitigation.

4.2.5 Cumulative Impacts

Individual projects would result in impacts that are cumulatively considerable when the individual project, along with all other past, present, and probably future projects, would contribute to the potential for global climate change. While individual projects are unlikely to measurably affect global climate change, each of these projects incrementally contributes toward the potential for global climate change on a cumulative basis, in concert with all other past, present, and probable future projects.

Despite the global nature of greenhouse gas impacts, it is important to note that the scope of the City's jurisdictional authority is limited to certain types of emissions generated within the City's physical boundaries. The City's authority does not include the regulation of the majority of actions, including for example, transportation policy, fuel consumption, and energy generation, which the state has determined are necessary to meet all of AB 32's greenhouse gas reduction goals. Further, some of the greenhouse gas emissions associated with the Project can be reduced only by measures to be implemented by other governmental agencies which are outside the City's jurisdiction. Greenhouse gas emissions are clearly significant on a global basis, and when greenhouse gas emissions are outside of the lead agency's jurisdiction and control, consistent with Public Resources Code Section 21081(a)(2), a project has cumulatively considerable significant and unavoidable greenhouse gas impacts if other agencies do not take necessary action. These other agencies can and should adopt requirements to ensure cumulative greenhouse gas reductions.

Greenhouse gas emissions modeling was used to predict the amount of greenhouse gases the Project would generate during construction and operation. The total greenhouse gas emissions were above the threshold of 3,000 $MTCO_2e$ per year used to evaluate this Project's direct impact.

Although the proposed Project is expected to emit greenhouse gases, given the global reach of climate change, the emission of greenhouse gases by a single project into the atmosphere is not necessarily an adverse environmental effect. Rather, it is the increased accumulation of greenhouse gas from more than one project and many sources in the atmosphere that may result in global climate change. The resultant consequences of climate change can cause adverse environmental effects on a cumulative basis. The fact that greenhouse gas emissions are cumulative was noted by the California Natural

Resources Agency in its Public Notice for the SB 97's CEQA amendments regarding greenhouse gases. Because the proposed Project's greenhouse gas emissions would exceed both the threshold selected for this Project and the South Coast AQMD's recommended threshold, the contribution of the proposed Project to the significant cumulative impact of greenhouse gas emissions would be cumulatively considerable.

4.2.6 References

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5.0 PROJECT ALTERNATIVES

5.1 Introduction

An EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment. In compliance with Section 15126.6(a) of the State CEQA Guidelines, an EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives." The City of Perris, as the CEQA Lead Agency, is responsible for selecting a range of project alternatives. This section identifies potential alternatives to the proposed Project and evaluates them, as required by CEQA.

Key provisions of the State CEQA Guidelines on alternatives (Sections 15126.6[b]–15126.6[f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in an EIR.

1. "The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objective or would be more costly" (Section 15126.6[b]).

2. "The specific alternative of 'no project' shall also be evaluated along with its impact" (Section 15126.6[e][1]).

3. "The 'no project' analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives" (Section 15126.6[e][2]).

4. "The range of alternatives required in an EIR is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent)" (Section 15126.6[f]).

5. For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (Section 15126.6[f][2][A]).

6. “If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given locations” (Section 15126.6[f][2][B]).

7. “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (Section 15126.6[f][3]).

Pursuant to the guidelines stated above, a range of alternatives to the Project is considered and evaluated in this Draft EIR. These alternatives were developed during Project planning and environmental review. The discussion in this section provides the following:

- A description of alternatives considered for analysis as well as rationale for those rejected from further analysis;

- A comparative analysis of the potential impacts associated with the alternatives under consideration and the Project. The focus of this analysis is to determine if alternatives can eliminate or reduce the significant environmental effects of the Project to a less than significant level; and

- An analysis of whether the alternatives meet most of the objectives of the Project.

5.2 Alternatives Considered and Not Carried Forward for Further Analysis

Section 15126.6(c) of the State CEQA Guidelines specifies that an EIR should: (1) identify alternatives that were considered by the lead agency but were rejected because they were determined to be infeasible during the scoping process, and (2) briefly explain the reasons underlying the lead agency’s determination. This section of the State CEQA Guidelines further states: “among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives; (ii) infeasibility; or (iii) inability to avoid significant environmental impacts.”

The alternatives described below were considered during the scoping and planning process but were not selected for detailed analysis in this Draft EIR given the reasons described below. Generally, the primary reasons for rejecting these alternatives were that they would not avoid or substantially reduce significant impacts associated with the Project or would not be consistent with the Project objectives.

5.2.1 Alternate Site Alternative

In accordance with State CEQA Guidelines Section 15126.6(f)(2), an alternative location for a project should be considered if the development of another site is feasible and if such development would avoid or substantially lessen the significant impacts of that project. Factors that may be considered when identifying an alternative site location include the size of the site, its location, the applicable land use

designation, and the availability of infrastructure. State CEQA Guidelines Section 15126.6(f)(2)(A) states that a key question in addressing an off-site alternative is "whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location." Another one of the factors for the feasibility of an alternative site is "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site."

The significant and unmitigable impacts of the project are related to air quality and greenhouse gas emissions, which are not primarily site dependent but rather associated with the proposed commercial land uses. The number of trips associated with the proposed Project uses does not depend on the location where these uses are proposed. While some decrease in trip lengths could occur in a VMT-efficient area, the number of trips would not be reduced such that the Project's significant air quality and greenhouse gas emissions impacts would be avoided. Further, the Project applicant does not control another site of comparable land area that is available for development of the Project within the City. As such, an alternate location alternative was rejected from further analysis in the Draft EIR.

5.2.2 Less than Significant Air Quality Impact Alternative

In order to avoid the Project's significant air quality impact, mobile trips associated with the proposed commercial development would need to be reduced by approximately 40 percent, which would correspond to 5,758 trips. This level of reduction in trips could be achieved, for example, with the removal of all six drive-through restaurants, or a 50 percent decrease in the total drive-through restaurant square footage in addition to removal of the 12 fuel pump gas station with convenience store and sit down restaurant uses. Other combinations of reductions could similarly achieve the 40 percent reduction in mobile trips; however, it remains the case that such reductions in trips would require substantial reductions in the development of the site. As such, this alternative would not meet the Project objectives and would not be economically feasible for development. It would also result in a substantial underutilization of the Project site. Therefore, an alternative to reduce air quality impacts below a level of significance was rejected from further analysis in the Draft EIR

5.2.3 Less than Significant Greenhouse Gas Emissions Impact Alternative

In order to avoid the Project's significant greenhouse gas emissions impact, mobile trips associated with the proposed commercial development would need to be reduced by approximately 88 percent, which would correspond to 12,667 trips. To reduce mobile trips to this level, only the 80,478 square feet of self-storage, two 6,000-square-foot sit-down restaurants, and car wash uses of the proposed Project could be retained. This alternative would not meet the Project objectives and would not be economically feasible for development. It would also result in a substantial underutilization of the Project site. Therefore, an alternative to reduce greenhouse gas emissions impacts below a level of significance was rejected from further analysis in the Draft EIR

5.3 Alternatives Analysis

Consistent with State CEQA Guidelines Section 15126(d), the alternatives described below are analyzed to include sufficient information to allow a meaningful analysis and comparison with the impacts of the Project. As described above, the significant and unmitigable impacts of the Project are air quality impacts and greenhouse gas emissions impacts. Therefore, the following analysis focuses on how the proposed alternative reduces the extent of these significant impacts. For the "build" alternative below (Alternative 2), it is assumed that the PVCCSP Standards and Guidelines, PVCCSP EIR mitigation

measures, and Project-specific mitigation measures identified for the Project would also be implemented with the alternative and thus serve to reduce or avoid potential significant impacts similar to the Project.

A No Project Alternative and Reduced Development Alternative are carried forward and evaluated in this EIR as alternatives to the proposed Project. The following rationale was considered when developing this range of alternatives:

- **Alternative 1 – No Project Alternative.** The No Project Alternative is required per State CEQA Guidelines Section 15126.6(e). It provides a basis for comparing the impacts that would occur if the Project were approved, relative to what would occur if the Project were not approved.

- **Alternative 2 – Reduced Development Alternative.** The Reduced Development Alternative is included to evaluate whether the Project's identified significant impacts would be avoided or substantially reduced with a feasible reduction in the intensity of the proposed development.

These alternatives represent a reasonable range of alternatives, as defined in the State CEQA Guidelines, because they provide feasible alternate development patterns that would reduce (but not eliminate) the significant impacts associated with the Project. The conclusion for each alternative also provides an overview of how the alternative meets, partially meets, or fails to meet the Project objectives.

5.3.1 No Project Alternative

5.3.1.1 Description of Alternative

State CEQA Guidelines Section 15126.6(e) requires that a "no project" alternative be evaluated along with its impacts to allow decision makers to compare the impacts of approving the Project with the impacts of not approving the Project. The "no project" analysis is required to discuss the existing conditions at the time the Notice of Preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services.

While existing entitlements allow construction of up to 220,250 square feet of commercial development on a portion of the proposed Project site, the Project applicant has informed the City that development consistent with the speculative commercial uses analyzed in the prior EIR for the site is not economically feasible. The commercial development analyzed in the prior EIR for the site assumed general retail uses would be constructed within the two eastern parcels of the Project site, while the westernmost parcel was reserved for I-215 onramp improvements. Further, alternative development consistent with this analysis has not been proposed since the entitlements for the site were approved in 2016 and the Project applicant does not anticipate that similar future development would be proposed. Therefore, with consideration of reasonably foreseeable development if the proposed Project were not approved, the No Project Alternative is a no-build alternative. Under the No Project Alternative, site conditions would remain as they were at the time the Notice of Preparation was issued in August 2024 and no physical change to the vacant Project site would occur.

5.3.1.2 Comparative Environmental Impact Analysis

Air Quality

No demolition, grading, construction, or development would occur under the No Project Alternative. Under this alternative, the Project site would remain vacant and no construction- or operation-related air pollutants would result. This would be a reduction in emissions compared to the proposed Project. No air quality impacts would occur under the No Project Alternative.

Greenhouse Gas Emissions

Similar to the description of air quality impacts provided above, the No Project Alternative would not result in greenhouse gas emissions associated with construction or operation, as the Project site would remain vacant. This would be a reduction in emissions compared to the proposed Project. No greenhouse gas emissions impacts would occur under the No Project Alternative.

5.3.1.3 Conclusions

The No Project Alternative would avoid the significant air quality and greenhouse gas emissions impacts associated with the proposed Project. However, the No Project Alternative would not meet any of the objectives of the proposed Project, and the benefits of the proposed Project would not be realized under the No Project Alternative. This alternative would leave the site vacant. Therefore, this alternative would not provide local serving commercial uses or increase employment opportunities within the City.

5.3.2 Reduced Development Alternative

5.3.2.1 Description of Alternative

As the significant air quality and greenhouse gas emissions impacts of the Project are primarily a result of mobile sources, the Reduced Development Alternative considers a development scenario that would implement the uses proposed by the Project applicant at a lower intensity, such that associated vehicle trips would be reduced. The Reduced Development Alternative considers development of commercial uses including 80,478 square feet of self-storage use across 22 buildings, two 6,000-square-foot sit-down restaurants, six drive-through fast-food restaurants comprised of 18,400-square-feet of building area, 20 vehicle fueling positions within one gas station including 5,000 square feet of convenience store uses, and a 5,425-square-foot automated car wash building. This scenario represents the removal of one gas station with 12 vehicle fueling positions and its associated convenience store as compared to the proposed Project. The Reduced Development Alternative retains the self-storage facility, drive-through restaurants, sit-down restaurant uses, and car wash as proposed by the Project. Vehicle trips associated with the Reduced Development Alternative would be reduced by approximately 2,083 average daily trips, representing an approximately 14 percent reduction from the vehicle trips associated with the proposed Project.

5.3.2.2 Comparative Environmental Impact Analysis

Air Quality

The Reduced Development Alternative would reduce the Project's air pollutant emissions when compared to the proposed Project because it would reduce the vehicle trips associated with the Project.

Construction emissions would decrease only slightly, as the majority of site preparation and grading activities would require the same intensity of construction as under the proposed Project. Greater reductions in air pollutant emissions generated by operations would occur because mobile sources would be reduced by 14 percent. However, as the Project's operational, mobile source pollutant emissions would need to be reduced by approximately 40 percent to be below the applicable emissions thresholds of significance, the Reduced Development Alternative would not reduce the Project's significant operational air quality impact to a less than significant level. As such, air quality impacts would remain significant and unavoidable under the Reduced Development Alternative, though the daily pollutant emissions would be decreased.

Greenhouse Gas Emissions

Similar to the discussion of air quality impacts above, the Reduced Development Alternative would have decreased greenhouse gas emissions impacts in comparison with proposed Project. The decreased building area to be constructed would reduce the total amount of construction activity and associated greenhouse gas emissions. During operation, slight decreases in greenhouse gas emissions from energy use would occur and a greater decrease, approximately 14 percent, in greenhouse gas emissions due to vehicle trips would occur. However, as the Project's mobile source greenhouse gas emissions would need to be reduced by approximately 88 percent to be below the applicable threshold, the Reduced Development Alternative would not reduce the Project's significant operational greenhouse gas emissions impact to a less than significant level. As such, greenhouse gas emissions impacts would remain significant and unavoidable under the Reduced Development Alternative, though total greenhouse gas emissions would be decreased.

5.3.2.3 Conclusions

The Reduced Development Alternative would reduce the significant air quality and greenhouse gas emissions impacts associated with the proposed Project, but not to a less than significant level. The Reduced Development Alternative would meet the Project objectives but to a lesser degree than the proposed Project because fewer local serving commercial uses and employment opportunities would be created.

5.4 Environmentally Superior Alternative

The State CEQA Guidelines require the identification of an environmentally superior alternative among the alternatives analyzed in an EIR, which is typically selected based on an ability to avoid or substantially reduce significant environmental effects associated with the project. State CEQA Guidelines Section 15126.6(e)(2) also requires that if the No Project Alternative is identified as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

Based on a comparison of the overall environmental impacts for the described alternatives, the No Project Alternative is identified as the environmentally superior alternative. This alternative would avoid the significant impacts that would occur with the proposed Project. However, the No Project Alternative does not meet any of the Project objectives.

Therefore, the other environmentally superior alternative is the Reduced Development Alternative. This alternative would meet the Project objectives, although to a lesser degree than the proposed Project

given the reduced commercial uses and employment opportunities that would be provided in the City. This alternative would reduce the pollutant and greenhouse gas emissions associated with the Project but would not reduce the significant air quality and greenhouse gas impacts of the Project to a less than significant level. No increase in the severity of impacts would occur under the Reduced Density Alternative.

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6.0 OTHER CEQA CONSIDERATIONS

State CEQA Guidelines Sections 15120-15132 set forth several general content requirements for EIRs. Those applicable to this Project that have not been provided in other sections of this Draft EIR include significant and unavoidable environmental effects (Section 15126(b)), significant irreversible environmental effects (Section 15126(c)), and growth inducing impacts (Section 15126(d)). This section addresses each of those general requirements.

6.1 Significant and Unavoidable Impacts

Section 15126(b), as further specified in Section 15126.2(c), of the State CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The significant environmental impacts of the Project are discussed in more detail in Sections 4.1, *Air Quality*, and 4.2, *Greenhouse Gas Emissions*, of this EIR.

With incorporation of applicable PVCCSP EIR mitigation measures and Project-specific mitigation measures, potential impacts related to the following environmental issues would be less than significant: aesthetics, agriculture and forestry resources, biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and services systems, and wildfire. Even with incorporation of the applicable PVCCSP EIR mitigation measures, the Project would result in the following significant and unavoidable impacts.

- **Project and Cumulatively Considerable Increase in Criteria Pollutant Emissions during Operation**: As discussed in Section 4.1 of this Draft EIR, the Project operational-source emissions of VOC, NOx, carbon monoxide, and PM_{10} would exceed the regional thresholds of significance established by the South Coast AQMD. The operational emissions would primarily be associated with vehicle sources. The City and the Project applicant do not have regulatory authority to control tailpipe emissions; therefore, no feasible mitigation beyond the measures identified in the PVCCSP EIR exist that would reduce mobile source emissions to levels below the regional thresholds of significance established by the South Coast AQMD. Therefore, operation of the Project would result in a significant and unavoidable net increase of criteria pollutants for which the project region is nonattainment under applicable federal or state ambient air quality standards. Subsequently, the proposed Project would result in a cumulatively significant and unavoidable impacts with respect to operational activity.

- **Project and Cumulative Greenhouse Gas Emissions**: As discussed in Section 4.2 of this Draft EIR, the Project's greenhouse gas emissions would exceed the threshold of 3,000 $MTCO_2e$ per year. There are no additional feasible mitigation measures beyond those identified in the PVCCSP EIR that would reduce the Project's greenhouse gas emissions to a less than significant level. The Project's vehicular source emissions are the cause of this threshold being exceeded and the City or Project applicant cannot readily decrease vehicle source emissions. Therefore, the proposed Project would result in cumulatively significant and unavoidable impacts with respect to greenhouse gas emissions.

No mitigation measures are feasible to reduce these potentially significant Project and cumulative impacts to a less than significant level. Therefore, adoption of a Statement of Overriding Considerations is required if the City of Perris City Council elects to approve the Project.

6.2 Significant and Irreversible Effects

Pursuant to State CEQA Guidelines Section 15126.2(d), an EIR must include a description of significant irreversible environmental changes that would be caused by the proposed action. Section 15126.2(d) reads as follows:

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

Determining whether the proposed Project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. Although the Project site is currently vacant and does not contain unique local or regional resources, the proposed Project would permanently alter the site for future generations by converting a predominantly vacant parcel to a developed site with commercial uses. A more detailed discussion of the Project's potentially significant and irreversible effects is provided in the following sections.

6.2.1 Irreversible Commitment of Resources

Implementation of the proposed Project would irreversibly commit the 20.28-acre vacant and underutilized Project site to development and commercial use. Although construction and operation of the proposed commercial uses at the Project site would contribute to the incremental depletion of renewable and nonrenewable resources, the proposed Project would be consistent with other existing and planned development in the Project vicinity within the PVCC area.

Construction of the proposed Project would require the use of renewable resources such as lumber and other forest products, which could be expected to be replenished over the lifetime of the Project because sustainably harvested lumber supplies are increased as seedlings mature into trees. As such, the development of the Project would not result in the irreversible commitment of renewable resources. Nevertheless, there would be an incremental increase in the demand for these resources during construction of the Project.

Construction of the Project would also result in the use of non-renewable resources including building materials (e.g., asphalt, petrochemical construction materials, steel, copper and other metals, and sand and gravel) and fossil fuels, including the use of fossil fuels for construction lighting and equipment, the transport of construction materials to the Project site and the transportation of construction workers to and from the Project site (e.g., natural gas, gasoline, diesel fuel and other petroleum-based products). These materials and the resources used in their production are available in a finite supply and are generally not retrievable, although some of the materials are recyclable. Construction materials like

concrete and asphalt, for example, can be crushed and recycled as road base. However, the majority of the Project 's construction materials would be non-renewable resources.

During Project operation, the Project would result in an irreversible commitment of nonrenewable resources, such as energy resources (petroleum and natural gas) and fossil fuels. Long-term energy resources would include fuel consumed for the heating and cooling of buildings, transportation of people and goods, as well as for lighting and other energy-related needs. Electricity consumption during operation would increase the consumption of oil, coal, and natural gas used at power plants located outside of the City. Given the statewide transition to renewable resources, it is likely that a larger percentage of the Project's energy would come from renewable sources over time; however, the conservative analysis conducted in this EIR assumes that the Project would continue to rely on nonrenewable energy resources during operation.

Natural gas, energy, and fuel consumption would not represent a significant impact, and the Project would not result in wasteful use of these resources. The Project would be a justified consumption of resources because the proposed Project is consistent with the City's planned non-residential and employment generating use of the site and because there are no unique characteristics of the proposed Project that would make this Project operate at a less energy efficient level than other similar developments.

6.2.2 Irreversible Environmental Changes

Irreversible environmental changes are typically associated with the environmental topics of agricultural and forestry resources, biological resources, cultural resources, paleontological resources, mineral resources, and tribal cultural resources. The Initial Study found that potential environmental effects to these resources resulting from implementation of the proposed Project would be below the level or significance or can be mitigated to below the level of significance, as described in Section 7.0, *Effects Found Not to be Significant*. Therefore, although the Project would result in changes to the existing site conditions, the Project would not result in significant irreversible environmental changes to these resources.

6.2.3 Potential Environmental Damage from Accidents

The Project applicant proposes a commercial center with restaurant, car wash, gas station, and self-storage components; however, potential impacts related to the creation of a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment were found to be less than significant without mitigation during preparation of the Initial Study (Section 7.0). Additionally, potential impacts related to hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or planned school, and safety hazards for people residing or working in the Project area, if within an airport land use plan or within two miles of a private or private-use airport would be reduced to less than significant levels through compliance with regulatory requirements and Riverside County Airport Land Use Commission conditions.

The Project site is located within a seismically active region and would be exposed to ground shaking during a seismic event. In order to address the potential for moderate to severe ground-shaking that may occur during the lifetime of the proposed structures, Project development would follow engineering and design parameters in accordance with the most recent edition of the California Building

Code and/or the Structural Engineers Association of California parameters, as required in standard City conditions of approval.

6.3 Growth Inducing Impacts

According to State CEQA Guidelines Section 15126.2(e), a project may foster economic or population growth, or additional housing, either indirectly or directly, in a geographical area if it meets any one of the following criteria below:

- A project would remove obstacles to population growth;
- Increases in the population may tax existing community service facilities, causing significant environmental effects; or
- A project would encourage and facilitate other activities that could significantly affect the environment.

6.3.1 Population Growth

The Project would not remove obstacles to population growth or directly contribute to population growth. The proposed Project involves construction and operation of commercial uses in an area that the City has planned for this type of development. No residential uses are proposed.

Although the Project includes expansion of infrastructure and roadway improvements in the immediate Project vicinity, these improvements have been planned for by the PVCCSP, the Riverside County Flood Control District, and the City of Perris Comprehensive General Plan 2030 and are intended to prevent additional impacts from operation of not only the proposed Project, but other similar development. Therefore, the Project would not create growth that would overwhelm or exceed existing service capacities.

Project implementation may indirectly induce population growth in the short term because it would be a new source of employment within the City. However, the extent to which the new jobs created by a project are filled by existing residents is a factor that tends to reduce the growth inducing effect of a project. Construction of the proposed Project would create short-term construction jobs which are anticipated to be filled by workers who, for the most part, reside in the Project area; therefore, construction of the proposed Project would not generate a permanent increase in population within the Project area. The workers constructing the Project are also not expected to require additional housing beyond those units which are currently available in the City, or the surrounding region.

6.3.2 Economic Growth

The long-term effect of the proposed Project would be to convert the currently vacant and underutilized site into commercial uses. The addition of commercial uses on a vacant site would cause an increase in economic activity over existing conditions. However, the Project would be consistent with the type of development anticipated in the PVCCSP, which aims to bolster the City's economy through local serving development and new jobs. Ultimate development of the Project would create long-term environmental consequences that are connected with any form of urbanization. However, the proposed Project has been designed to benefit the community and population by providing increased opportunities for

employment in closer proximity to residential development and would ultimately provide for a form of long-term productivity which appears compatible with human needs in the area.

6.3.3 Removing Obstacles to Growth

The removal of either physical or regulatory obstacles to growth is considered to be a growth-inducing impact. A physical obstacle to growth typically involves the lack of public service and/or utility infrastructure. A project would trigger growth if it would result in infrastructure with excess capacity or if it would remove an obstacle to growth in an area, such as providing infrastructure to an area that was previously not available. The Project site is located in in a developed area currently served by existing public services.

The Project includes a Specific Plan Amendment to make the Project consistent with the site's land use designation and zoning. The PVCCSP designates the Project site as a Commercial land use and zone, which is defined as a zoning designation that provides for retail, professional office, and service-oriented business activities that serve the entire City, as well as the surrounding neighborhoods. The proposed amendment to the PVCCSP would add self-storage facilities to the list of permitted uses within the Commercial land use designation. While the Specific Plan Amendment would expand the allowable land uses in other parcels designated for Commercial development, the amendment would not necessarily constitute a change that would result in unplanned growth elsewhere within the PVCC area. Self-storage uses have a lower trip generation rate than other Commercial uses. As a result, while the amendment would expand the uses allowed under the Commercial land use designation, the addition of self-storage uses would not result in unplanned growth.

The Project does not include the extension or expansion of public services beyond connections or upgrades to the existing infrastructure in the immediate vicinity that are required to serve the Project. The Project would connect to existing utilities, including water, sewer, stormwater, electrical, telecommunication services, and natural gas. These connections would provide utility services to the proposed uses but would not expand the capacity of the utilities such that future development would be induced to the area. The Project would not result in the need for new or physically altered facilities related to fire, police, schools, or libraries. Refer to Chapter 7.0, *Effects Found Not to be Significant*, for further details.

The Project developer(s) would construct roadway improvements on Ramona Expressway and Webster Avenue consistent with the PVCCSP. These are improvements to existing roadways that would improve safety and connectivity but would not provide access to previously inaccessible areas such that they would facilitate future development elsewhere. As such, proposed roadway improvements would not trigger growth in the area.

Based on the above, the Project would not remove obstacles to growth by extending infrastructure to new areas, nor would it result in significant adverse environmental impacts beyond those analyzed in this EIR due to the expansion of infrastructure such as water supply facilities, wastewater treatment plants, roads, or freeways.

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7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

An analysis of the proposed Project's effect on the environmental topic areas included in the Environmental Checklist form in State CEQA Guidelines Appendix G was conducted as part of the preparation of the Initial Study included in Appendix A f this Draft EIR. During this evaluation, certain aspects of the Project were found to have no impact, a less than significant impact, or a less than significant impact with mitigation. The effects determined not to be significant are not required to be included in the primary analysis sections of the Draft EIR.

CEQA Section 21100(c) states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. State CEQA Guidelines Section 15128 adds, "Such a statement may be contained in an attached copy of an Initial Study."

The complete Initial Study prepared for the proposed Project, included in Appendix A, concluded that the proposed Project would not result in significant impacts to the following environmental topics or portions of those topics as described below. In accordance with State CEQA Guidelines Section 15128, the following section provides a brief description of potential impacts found to be less than significant or less than significant with mitigation and additional detail is provided in the appended Initial Study. In some cases, the Project would have no impact. The specific issue areas and thresholds below are not discussed further within the body of this Draft EIR.

7.1 Summary of Effects Found Not to be Significant

7.1.1 Aesthetics

a) Would the Project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The Project site is relatively flat and undeveloped with little topographical change and sparse vegetation. Development at the Project site would include commercial land uses and associated parking and landscaping bordering Ramona Expressway and Webster Avenue, which are east-west and north-south trending roadways, respectively, within the Visual Overlay Zone of the PVCCSP. I-215 is also within the Freeway Corridor of the PVCCSP Visual Overlay Zone and motorists traveling along I-215 would have views of the Project site; however, this is not within the viewshed of a scenic vista. While development of the Project may obstruct views to the foothills from at least some vantage points, the Project site is located within the boundaries of the PVCC and would not adversely impact a scenic vista given there are no scenic vistas available from the PVCC. Furthermore, the building design would be consistent with land use development regulations, including the PVCCSP design standards described above. The Project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant.

b) Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The Project site is vacant and does not contain scenic resources such as trees, rock outcroppings, or historic buildings. Further, while there are three officially designated state scenic highways in Riverside County, including SR 62, SR 74, and SR 243, none of these designated state scenic

highways have views of the Project site given that the nearest state scenic highway is SR 74, approximately four miles from the Project site (California Department of Transportation [Caltrans] 2023). Thus, as the Project site is not visible from an officially designated state scenic highway and no unique scenic resources exist onsite, there would be no impact to scenic resources within a state scenic highway.

c) *In non-urbanized areas, would the Project 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?*

Less Than Significant Impact. Development immediately surrounding the vacant and undeveloped Project site includes a gas station, single-family residential uses, commercial retail development, and warehouse buildings, as well as vacant and undeveloped land. The Project site is zoned for commercial uses and proposes development consistent with that designation. The addition of a self-storage facility to the allowable land uses within the Commercial land use designation would not result in substantially altered visual effects than would occur with other commercial development. The Project would also comply with applicable site development criteria contained within the PVCCSP, such as height limitations and setbacks as well as guidelines for projects within the Visual Overlay Zone. Therefore, although the Project site would be converted from a vacant lot to a developed commercial site, this conversion is consistent with surrounding existing and planned land uses, as identified in the PVCCSP, and would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Impacts would be less than significant.

d) *Would the Project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?*

Less Than Significant Impact. Existing lighting in the Project vicinity includes streetlights and vehicle lights along surrounding roadways, as well as interior and exterior building lighting emanating from the developed commercial and industrial sites. The Project would introduce new lighting at a vacant site without existing light sources; however, land uses and roadways surrounding the Project site generate light in the Project vicinity. Project lighting is anticipated to include a combination of operational, street, and security lighting on building exteriors and in parking areas that would conform to the California Building Standards Code, Title 24, and City standards that regulate outdoor lighting. Compliance with the requirements of the PVCCSP related to building materials would ensure that glare does not create a nuisance to on- and off-site viewers of the Project site or aircraft traveling to or from MARB/IPA. During construction, lights may be used within the construction areas, notably the construction staging areas, to provide security for construction equipment and construction materials. While construction lighting would not result in substantial light or glare for residents or motorists due to distance, the City's standard review process for nighttime lighting requests would further ensure construction lighting would not create adverse effects. Therefore, Project impacts related to glare would be less than significant.

7.1.2 Agriculture and Forestry Resources

a) Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. According to the Farmland Mapping and Monitoring Program online mapping database (California Department of Conservation 2022), the Project site is classified as Farmland of Local Importance and does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland). While the undeveloped Project site would be converted from vacant to developed land, the conversion would not include the loss of active farmland. As there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) at the Project site, no impact would occur in relation to this issue.

b) Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. As stated above, the Project site is located in an area classified by the Department of Conservation as Farmland of Local Importance where no active farmland nor agricultural resources are present. Additionally, the Project site is not within an established agricultural preserve consisting of at least 20 acres of Prime Farmland or at least 40 acres of land not designated as Prime Farmland. Further, the Conservation Element of the General Plan does not map Williamson Act land within the Project site (City 2008). Finally, the Project site is zoned Commercial in the PVCCSP. Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract and no impact would occur.

c) Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. There are no trees within the Project site and the Project site is not zoned for forest land or timberland. Therefore, the proposed Project would not conflict with existing zoning for forest land or timberland. No impact to forest land, timberland, or timberland zoned Timberland Production would occur.

d) Would the Project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As stated above, there is no concentration of trees on the site that would constitute a forest. The site has not been historically and is not currently used or planned to be used for forest land. As such, implementation of the proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur in relation to this issue.

e) Would the Project 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?

No Impact. As stated above, the Project site is located within an area classified as Farmland of Local Importance, but no agricultural resources are present on the Project site or immediate vicinity. Additionally, there is no concentration of trees that would constitute a forest within the Project site. The

proposed Project would result in the conversion of the undeveloped Project site to a developed use, but the Project site does not contain agriculture or forest uses under existing conditions. Therefore, implementation of the Project would not result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur in relation to this issue.

7.1.3 Biological Resources

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

Less Than Significant with Mitigation Incorporated. Surveys of the Project site were conducted by Principe and Associates as part of the MSHCP Consistency Analysis and by HELIX Environmental Planning for the Crotch's Bumble Bee Habitat Assessment. Based on their observations, the site is currently undeveloped and comprised of disturbed non-native grasslands. Native vegetation and habitats within the site have been eliminated due to long-term disturbances associated with agricultural and weed abatement activities. No special-status plant species have the potential to occur within the Project site and no impact to special-status plant species would occur as a result of the Project. Given that no listed wildlife species have the potential to occur within the Project site based on the lack of habitat, no impact to these species or their habitats would occur.

The Project site provides potential nesting habitat for a variety of birds and raptors protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. Vegetation removal during the nesting season (generally February 1st - August 31st although the nesting season may be extended due to weather and drought conditions) has the potential to result in adverse effects on nesting birds, if present, and impacts to nesting birds would be potentially significant. Implementation of Project mitigation measure MM BR 1 (replacing PVCCSP EIR mitigation measure MM Bio 1 per direction from the California Department of Fish and Wildlife) would reduce potential impacts to a less than significant level.

Project Mitigation Measures:

MM BR 1 In order to avoid violation of the MBTA and the California Fish and Game Code, site preparation activities (ground disturbance, construction activities, staging equipment, and/or removal of trees and vegetation) for the Project shall be avoided, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species.

If site-preparation activities are proposed during the nesting/breeding season, the Project proponent shall retain a qualified biologist to conduct a pre-activity field survey prior to the issuance of grading permits for the Project to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone.

If active nests are not located within the Project site and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, then construction may be conducted during the nesting/breeding season. However, if active

nests are located during the pre-activity field survey, then the biologist shall immediately establish a conservative avoidance buffer surrounding the nest based on their best professional judgement and experience. The biologist shall monitor the nest at the onset of project activities, and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the biologist determines that such project activities may be causing an adverse reaction, the biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers will be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The onsite qualified biologist will review and verify compliance with these nesting avoidance buffers and will verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found. Upon completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to the City for mitigation monitoring compliance record keeping.

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

No Impact. As described above, the Project site consists of non-native grasslands. No riparian habitats or other sensitive natural communities were identified within the Project site by Principe and Associates biologists. Given that no riparian or riverine areas occur on the Project site, no impacts to riparian habitat or other sensitive natural communities would occur.

c) *Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

No Impact. According to the biological evaluation conducted for the Project (Appendix A of Appendix A), there are no state or federally protected wetlands within the Project site. In addition, no riparian or riverine resources protected by the MSHCP occur within the Project site. As such, a substantial adverse effect on state or federally protected wetlands would not occur as a result of the Project. There would be no impact.

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

No Impact. The Project site is not located within an MSHCP Criteria Cell Group, Conservation area or other designated wildlife corridor. The Project site is bordered by Ramona Expressway followed by a mix of vacant and undeveloped land to the south, industrial uses to the north, a mix of commercial and residential uses to the east, and I-215 to the west. The Project site is not located near open space or native habitat and does not represent a wildlife movement corridor. Therefore, the Project would not result in interference with wildlife movement. There would be no impact.

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

No Impact. Protected biological resources are not present within the site, and the proposed Project would not conflict with any local policies or ordinances protecting biological resources. Therefore, no impact would occur.

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

Less Than Significant Impact. The MSHCP is the habitat conservation plan applicable to the Project. The Project site is not located within an area dedicated to habitat conservation under the MSHCP and no habitat mitigation would be required. In addition, no riparian, riverine, or vernal pools are located within the Project site and the site is outside of survey areas for protected species. The Project site is not located within or adjacent to an MSHCP Conservation Area. Therefore, the Project would not conflict with the MSHCP and impacts would be less than significant.

7.1.4 Cultural Resources

a) Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. Based on the results of the cultural resources assessment conducted for the Project (Keller 2023; Appendix C of the Initial Study), while 38 cultural resource properties have been recorded within a one-mile radius of the Project site, no known historical resources are present within the Project site. As there are no structures within the site, no built environment historical resources would be affected by Project construction. No historical resources are known to occur within the Project site and the Project would not cause a substantial adverse change in the significance of a historical resource. No impact would occur.

b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant with Mitigation Incorporated. As described above, no known cultural resources are present on the Project site. In addition, the majority of resources identified within one mile of the Project site during the records search are historic period resources rather than archaeological resources. Therefore, no archaeological resources are anticipated to occur within the site and Project construction is not anticipated to disturb archaeological resources. However, ground disturbing activities have the potential to encounter previously undiscovered archaeological resources, which could result in a potentially significant impact. Therefore, Project mitigation measure MM CR 1 shall be implemented to ensure that ground-disturbing activities are monitored by a professional archaeologist and that any unearthed archaeological resources are salvaged and treated appropriately. Project mitigation measure MM CR 1 implements PVCCSP EIR mitigation measures MM Cultural 2 through MM Cultural 4 as subsequently revised by the City of Perris. Implementation of Project mitigation measure MM CR 1 would reduce the impact to a less than significant level.

Project Mitigation Measures:

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). Selection of the Project Archaeologist shall be subject to the approval of the City of Perris Director of Development Services and no ground-disturbing activities shall occur at the site or within the off-site Project improvement areas until the Project Archaeologist has been approved by the City.

The Project Archaeologist shall be responsible for monitoring ground-disturbing activities, including initial vegetation removal, 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, 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, the Soboba Band of Luiseño Indians, the Rincon Band of Luiseño Indians, the Agua Caliente Band of Cahuilla Indians, and the Pechanga Band of Indians. A designated Native American representative from either the Soboba Band of Luiseño Indians, the Rincon Band of Luiseño Indians, the Agua Caliente Band of Cahuilla Indians, or the Pechanga Band of Indians shall be retained to assist the Project archaeologist in the significance determination of the Native American as deemed possible. The designated tribal representative will be given ample time to examine the find. The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA and shall consider the religious beliefs, customs, and practices of the tribe. If the find is determined to be of sacred or religious value, the tribal representative will work with the City and consulting archaeologist to protect the resource in accordance with tribal requirements. All analysis will be undertaken in a manner that avoids destruction or other adverse impacts.

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

Native American artifacts that are relocated/reburied at the Project site shall be subject to a fully executed relocation/reburial agreement with the assisting tribe. This shall include, but not be limited to, an agreement that artifacts shall be reburied onsite 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 Code of Federal Regulations 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 tribe(s) involved with the Project.

c) *Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?*

Less Than Significant with Mitigation Incorporated. The proposed Project site has been historically used for agriculture and has been vacant since at least 1966 according to aerial imagery. No known cemetery use has occurred at the Project site; therefore, the Project site is not expected to contain human remains, including those interred outside of formal cemeteries. However, in the unlikely event that human remains are discovered during construction, disturbance of the remains would result in a potentially significant impact. Project mitigation measure MM CR 2 would be implemented to require all activities in the vicinity of the remains to occur in compliance with California Health & Safety Code Section 7050.5 and California Public Resources Code Section 5097.98. Project mitigation measure MM CR 2 implements PVCCSP EIR mitigation measure MM Cultural 6, as subsequently revised by the City of Perris, and would reduce impacts to human remains to a less than significant level.

Project Mitigation Measures:

MM CR 2 In the event that human remains (or remains that may be human) are discovered at the Project site during ground-disturbing activities, the construction contractors and 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 will 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 the Native American human remains and may recommend to the Project proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave goods. The MLD shall complete 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 would be proprietary and not disclosed to the general public. The locations will be documented by the consulting archaeologist in conjunction with the various stakeholders and a report of findings shall be filed with the Eastern Information Center.

7.1.5 Energy

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

Less Than Significant Impact. During construction, the Project would temporarily consume energy in the form of fuels for the operation of construction equipment and vehicles. Due to the temporary nature of construction and the financial incentives for developers and contractors to use energy-consuming resources in an efficient manner, the construction phase of the proposed Project would not result in wasteful, inefficient, and unnecessary consumption of energy. During operation, the Project would consume energy in the forms of electricity for building operations and fuels for equipment use and mobile trips, as discussed in the Project's Energy Analysis (Appendix D of Appendix A). For operational energy use, the Project would be required to meet CCR Title 24 standards and the CALGreen Code, which aim to reduce building energy consumption through sustainable building practices. Compliance with Title 24 and CALGreen standards as well as PVCCSP design standards and guidelines would ensure the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation. While impacts related to energy would not be significant,

implementation of PVCCSP EIR mitigation measures MM Air 19 and MM Air 20 would further reduce the Project's energy consumption. Impacts would be less than significant.

b) Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The Project would not conflict with state or local plans for renewable energy efficiency, such as Title 24 and CALGreen. The Project would employ standard methods of construction and would comply with regulations that limit idling from diesel-powered equipment (CCR Title 13, Sections 2449 and 2485). The Project would comply with Title 24 energy efficiency standards. While impacts related to energy would not be significant, implementation of PVCCSP EIR mitigation measures MM Air 19 and MM Air 20 would reduce the Project's energy consumption beyond regulatory standards. The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

7.1.6 Geology and Soils

a) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?

No Impact. The City, like the rest of southern California, is located within a seismically active region as a result of being located near the active margin between the North American and Pacific tectonic plates. However, as discussed in the Geotechnical Interpretive Report (Appendix E of Appendix A), the Project site is not within an Alquist-Priolo Fault Zone. The San Jacinto Fault Zone is the nearest Alquist-Priolo Earthquake Fault Zone to the Project site and is located approximately 8.5 miles east of the Project site. Due to this distance, the Project would not be subjected to fault rupture associated with an Alquist-Priolo Fault Zone. No other faults are known to traverse the Project site. No impact associated with fault rupture would occur at the Project site.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project site is located in a seismically active region and ground shaking is likely to occur at the site within the life of the proposed Project. Engineering and construction of the Project would be required to be in conformance with the California Building Code and other applicable standards. Given conformance with standard engineering practices and design criteria, the Project would not directly or indirectly cause adverse effects related to seismic ground shaking. Impacts associated with seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. The Preliminary Geotechnical Interpretive Report concluded that the Project site is in an area with low potential for liquefaction hazards due to the lack of groundwater within 50 feet of the ground surface (Appendix E of Appendix A). Also, the Project site is identified in the City's General Plan to be an area of low liquefaction susceptibility (City 2021). Therefore, impacts related

to exposing people or structures to seismic-related ground failure, including liquefaction, would be less than significant.

iv. Landslides?

No Impact. The Project site is relatively flat and there are no hillsides or steep topographic features at the site or in surrounding areas. According to the City's General Plan Safety Element, the Project site is not located within an area with high susceptibility to seismically induced landslides and rockfalls (City 2021). As such, there would be no impact related to landslides as a result of the proposed Project.

b) Would the Project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Soil exposed by construction activities, particularly clearing and grading, could be subject to erosion if exposed to heavy rain, winds, or other storm events. Compliance with South Coast AQMD Rule 403 (Fugitive Dust) and PVCCSP EIR mitigation measure MM Air 3 would include implementation of soil stabilization measures, such as daily watering, and compliance with the National Pollutant Discharge Elimination System Construction General Permit would include implementation of the City's standard erosion control practices, such as silt fencing, fiber rolls, or sandbags. Further, the California Building Code requires an erosion control and grading plan prior to issuance of a grading permit as a means to minimize soil erosion to the extent practicable during both construction and operation. Once operational, the Project site would include some impervious or semi-impervious features, that if not designed properly could allow for stormwater to sheet flow and consequently erode soils. However, the preparation of a Water Quality Management Plan (WQMP) would describe the management of stormwater flows so as to not carry soils and sediments. Additionally, the Project's storm drain and storage facilities would capture storm flows that could otherwise erode loose soils and pump them to a bioswale that would treat runoff. Therefore, compliance with the various permits and regulations related to water quality and erosion would reduce Project impacts to less than significant levels and no mitigation would be required.

c) Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. The Project site is not located within an area that is subject to landslides or liquefaction, thus impacts related to landslides and liquefaction would not occur (Appendix E of Appendix A). The Perris Valley is susceptible to subsidence in various portions of the region. However, impacts related to lateral spreading, subsidence, or collapse would not be significant because the proposed Project would not be subject to liquefaction, which is associated with the potential for other subsidence events, and would comply with the California Building Code building safety design standards. Therefore, impacts related to geologic instability would be less than significant and no mitigation would be required.

d) *Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property*?

Less Than Significant Impact. The majority of soil that underlies the Project site has a very low to low potential for shrinking and swelling (Appendix E of Appendix A). Furthermore, adherence to standard engineering practices contained within the California Building Code would reduce the potential for adverse effects related to soil expansion to occur. Impacts would be less than significant.

e) Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The proposed Project does not include or require the use of septic tanks or alternative wastewater disposal systems. Existing sewer infrastructure existing in the Project site vicinity would serve the Project. No impact would occur.

f) Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant with Mitigation Incorporated. According to the City General Plan Conservation Element Figure CN-7 (City 2008), the Project site is located within an area identified as highly sensitive for the discovery of paleontological resources. Based on the ground disturbance necessary to complete the Project, there is potential for the Project to result in significant impacts to unique paleontological resources within Pleistocene-aged alluvial deposits, either at the surface or at depth. Because of the high paleontological sensitivity at the Project site and at the recommendation of the Paleontological Resources Memorandum (Appendix F of Appendix A), Project mitigation measures MM GR 1 and MM GR 2 shall be implemented to reduce potential impacts to less than significant levels. Project mitigation measure MM GR 1 implements PVCCSP EIR mitigation measure MM Cultural 5, as subsequently revised by the City of Perris. Impacts would be less than significant with the incorporated mitigation measures.

Project Mitigation Measures:

MM GR 1 Prior to the issuance of grading permits, the Project applicant shall submit to and receive approval from the City, a Paleontological Resource Impact Mitigation Monitoring Program. The Paleontological Resource Impact Mitigation Monitoring Program shall include the provision for a qualified professional paleontologist (or his or her paleontological monitor representative) to be onsite or any Project-related excavations. 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 the off-site Project improvement areas until the paleontologist has been approved by the City.

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

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

A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a

discussion of the significance of all recovered specimens. The report and inventory, when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontological resources.

MM GR 2 Prior to the start of construction, a paleontological resources worker environmental awareness program training shall be presented to all earthmoving personnel to inform them of the possibility for buried resources and the procedures to follow in the event of fossil discoveries.

7.1.7 Hazards and Hazardous Materials

a) Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Potentially hazardous materials (e.g., fuel, lubricants, and solvents) may be used during construction activities. Hazardous materials used during Project construction would be transported, used, and stored in accordance with state and federal regulations regarding hazardous materials. With mandatory compliance to applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Potential impacts related to hazardous materials during construction would be less than significant and no further evaluation is required.

Operation of the proposed Project would involve the use of materials common to urban development that are labeled hazardous (e.g., solvents and commercial cleansers; petroleum products; and pesticides, fertilizers, and other landscape maintenance materials). The proposed self-storage, restaurant, convenience store, and car wash uses are not anticipated to use acutely hazardous materials during operations but each future tenants would be required to comply with applicable federal, state, and local laws and regulations regarding the transport, use, and storage of hazardous materials, as discussed further below.

The Project would result in the routine transport and use of retail fuels, as the Project includes two gas stations. All fuel tanks and dispensers would be equipped with the latest Phase I and Phase II Enhanced Vapor Recovery air pollution control equipment technology as required by CARB regulations and associated Executive Orders. There are no sensitive receptors located within 50 feet of the proposed gas station locations. Therefore, operations associated with the proposed gas station uses would not result in substantial hazards to the public or environment.

Hazardous materials or wastes stored on site would be subject to requirements associated with accumulation time limits, amounts, and proper storage locations and containers, and proper labeling. Based on compliance with applicable regulations, operation of the Project would not create a significant risk to the public or the environment through the potential routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

b) Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. Hazardous materials releases could occur if existing hazardous materials at the Project site would be disturbed by Project construction or operation, or if future Project

construction or operation activities involve the handling of substantial amounts of hazardous materials with a potential to result in upset and accident conditions. No Recognized Environmental Conditions were documented or identified in the Phase I Environmental Site Assessment (ESA) related to potentially hazardous materials (Appendix G of Appendix A). Therefore, PVCCSP EIR mitigation measure MM Haz 7 is not required for the proposed Project.

During the temporary, short-term construction period, there is the possibility of accidental release of hazardous substances such as spilling of hydraulic fluid or diesel fuel associated with construction equipment maintenance. The construction contractor would be required to use standard construction controls and safety procedures to avoid or minimize the potential for accidental release of such substances into the environment. Further, Project operations would involve standard commercial activities and while it is possible that hazardous materials could be used by a future occupant's daily operations, these operations would be required to occur in compliance with all applicable local, state, and federal regulations related to the transport, handling, and usage of hazardous materials. The delivery of fuels for the proposed gas stations would occur in compliance with applicable regulations intended to prevent accidents during transport and delivery of gasoline and diesel fuels. Therefore, the impact of the proposed Project with respect to exposing the public or the environment to hazardous materials through upset and accident conditions would be less than significant.

c) Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The Project site is not located within one-quarter mile of a school, as the schools nearest to the Project site are approximately 0.36 mile south of the Project site (Val Verde Academy, Val Verde High School, and the Val Verde Regional Learning Center). Furthermore, the use of hazardous materials at the Project site would be in accordance with applicable standards and regulations. Therefore, no impact related to the handling of hazardous materials within one-quarter mile of a school would occur.

d) Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. The State Water Resources Control Board GeoTracker database (2023) and the California Department of Toxic Substances Control EnviroStor database (2023) are databases compiled pursuant to Government Code Section 65962.5 (Cortese List) requirements and were searched for hazardous materials sites within and surrounding the Project site. The Phase I ESA identified one EnviroStor record located over 0.25 mile south of the Project site; based on distance and direction, the site would not be considered an environmental concern to the Project (Appendix G of Appendix A). The Phase I ESA also completed a GeoTracker search which revealed no incidents at or in the immediate vicinity of the Project site. The Project site is not located on or within 1,000 feet of an active hazardous materials site according to these databases. Therefore, no impact related to hazardous materials sites is anticipated.

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 site?

Less Than Significant Impact. The nearest airport to the Project site is MARB/IPA, located approximately one mile to the north. The Perris Valley Airport is located approximately 5.3 miles south of the Project site and the Project site is not located within the Airport Influence Area Boundary for this airport

(Riverside County Airport Land Use Commission [ALUC] 2011). However, the proposed Project site is located within the ALUCP area for MARB/IPA (Riverside County ALUC 2014), the 2018 AICUZ Study (MARB 2018), and the PVCCSP AOZ (County of Riverside 2023). The Project site is within Zone C1 per the MARB/IPA ALUCP. The Project site is not within an Accidental Potential Zone. The Project site is outside of the 60 decibel (dB) CNEL noise contours for MARB/IPA (MARB 2018). Noise impacts associated with aircraft activity are evaluated further in Section XIII, *Noise*, and would not be considered significant for the proposed land uses. The proposed land uses do not include any prohibited uses of the MARB/IPA ALUCP for Zone C1, such as children's schools, libraries, and day care centers. The Riverside County ALUC reviewed the Project and confirmed the consistency of the proposed Project with the ALUCP in a hearing on July 11, 2024 (Riverside County ALUC 2024). Typical conditions were placed on the Project as a result of the ALUC review and include light shielding, tenant notification, and ALUC notification requirements as well as prohibition of specific uses not proposed by the Project. As the Project does not include discouraged uses within Zone C1, impacts associated with aircraft safety would be less than significant. The proposed Project would be required to comply with PVCCSP EIR mitigation measures MM Haz 2 through MM Haz 5, which are consistent with the types of conditions provided by ALUC, to avoid potential impacts associated with MARB/IPA operations. Therefore, impacts related to noise and hazards from aircraft operations would be less than significant and no Project-specific mitigation would be required.

f) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The City participates in the Riverside County Multiagency Multi-Hazard Functional Plan, which outlines requirements for emergency access and standards for emergency responses. Access to the Project site would be via Webster Avenue and Ramona Expressway. During construction of the Project, heavy construction vehicles could interfere with emergency response to the site or emergency evacuation procedures in the event of an emergency (e.g., vehicles traveling behind the slow-moving truck). However, such delays would be brief and infrequent. Moreover, as required in the City's Municipal Code Section 10.12.100, no street shall be closed or partially obstructed, or detours established, without approval of the City's traffic engineer. The Project would provide driveways and internal circulation elements consistent with applicable policies related to emergency access. As a result, the Project's impacts would be less than significant.

g) Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. According to the Safety Element of the City's General Plan, wildfires typically pose minimal threat to people and buildings in urban areas but increasing human encroachment into natural areas increases the likelihood of bodily harm or structural damage. This encroachment occurs in areas called the wildland-urban interface, which is considered an area within the high and very high fire hazard severity zone (VHFHSZ), as defined by the California Department of Forestry and Fire Protection. The City of Perris General Plan Safety Element Wildfire Hazards map shows that the Project site is not located in a VHFHSZ (City 2021). Therefore, the proposed Project would not expose people or structures to wildland fires. No impacts associated with wildland fires would occur.

7.1.8 Hydrology and Water Quality

a) Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. Construction of the proposed Project would include grading, which may have the potential to release pollutants (e.g., oil from construction equipment, cleaning solvents, paint) and silt off-site which could impact water quality. During operation, the discharge of minor amounts of fuels or other pollutants associated with automobiles into storm drains during rain events may occur. The proposed Project would incorporate site design, source control, and treatment control best management practices (BMPs) to address storm water runoff during operation and would implement BMPs during construction in accordance with a Storm Water Pollution Prevention Plan (SWPPP) and during operation in accordance with a WQMP. Thus, through the BMPs and compliance with existing regulations such as the implementation of the WQMP, the proposed Project would not violate water quality standards or waste discharge requirements. Therefore, potential impacts would be less than significant.

b) Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. While the majority of the site would become impermeable after development, Project design features and BMPs such as the use of impervious or semi-pervious materials and the use of landscaping would facilitate some groundwater recharge and percolation. In addition, due to the proposed Project site's small size in relationship to the total size of the San Jacinto Groundwater Basin (approximately 188,000 acres), there would not be a substantial effect upon groundwater recharge within the groundwater basin. Furthermore, the Project would rely on domestic water supply, would not require the use of groundwater sources, and would not substantially deplete groundwater supplies. Therefore, potential impacts would be less than significant.

c) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site?

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?

iv. Impede or redirect flood flows?

Less Than Significant Impact. Due to the increase in impervious surfaces that would be constructed on the site, the Project has been designed with underground storage to offset the difference in runoff volume between the developed and pre-developed condition. Onsite site soils have tested infiltration potential less than the required level, so bio swales are proposed along the southern portion of the site to provide water quality treatment. De-watering of the underground storage would be provided by a

pumping system. In addition to the underground storage, a system of storm drains is proposed to collect and route Project site runoff to outlet at the southeast corner of the Project site. Since the onsite runoff would be accommodated by onsite storage facilities and would utilize an existing channel and storm drain facility, the proposed Project would not substantially alter the existing drainage pattern of the site or area, in a manner which would result in substantial erosion or siltation, flooding, exceedance of stormwater drainage capacity, or redirection of flood flows. Thus, impacts would be less than significant.

d) In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to Project inundation?

No Impact. According to the Safety Element of the City General Plan, the Project site is not located within a Special Flood Hazard Area Inundated by 100 Year Flood Zone or within a Dam Inundation Area (City 2021). The proposed Project site is located approximately 35 miles from the Pacific Ocean; therefore, risks from a tsunami are not present for the Project site. A seiche is a standing wave in an enclosed or partly enclosed body of water. Seiches are normally caused by earthquake activity, and can affect harbors, bays, lakes, rivers, and canals. The nearest enclosed body of water, Lake Perris, is approximately 3 miles away, which is too far to result in inundation at the Project site during a seiche event. No impact related to the release of pollutants due to tsunamis or seiches would occur.

e) Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. Implementation of the Project would not have a substantial effect on groundwater recharge within the overlapping Perris North Groundwater Management Zone of the West San Jacinto Groundwater Sub-basin. Under the Sustainable Groundwater Management Act passed in 2014 (California Water Code Section 10729[d]), each high and medium priority basin, as identified by the California Department of Water Resources, is required to have a Groundwater Sustainability Agency that will be responsible for groundwater management and development of a Groundwater Sustainability Plan (California Department of Water Resources 2020). The EMWD Board of Directors is the Groundwater Sustainability Agency for the West San Jacinto Groundwater Sub-basin and is responsible for development and implementation of a Groundwater Sustainability Plan, which was approved in 2023. The Project would not conflict with the plan because groundwater would not be used to serve the Project. The Project would be supplied with imported, potable water and recycled water for non-potable water demands and the Project site is not within a groundwater recharge area. Therefore, the Project would not conflict with or obstruct implementation of a sustainable groundwater management plan and impacts would be less than significant. The water quality control plan applicable to the Project is the Santa Ana Regional Water Quality Control Board (RWQCB) Water Quality Control Plan for the Santa Ana River Basin (Basin Plan), which designates beneficial uses and water quality objectives for all the ground and surface waters in the region. At the Project level, compliance with RWQCB permits and objectives through implementation of a SWPPP and WQMP prepared pursuant to RWQCB requirements would ensure the Project does not conflict with or obstruct implementation of the applicable water quality management plan. Potential impacts would be less than significant.

7.1.9 Land Use and Planning

a) Would the Project physically divide an established community?

No Impact. The Project would result in the development of an existing vacant lot that is surrounded by development and roadway facilities on all sides. The Project does not include any linear features that would extend outside of the Project site and physically divide an established community. Therefore, no impact would occur.

b) Would the Project cause significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The proposed Project site is located within the City and within the PVCC planning area. Thus, land use is guided by both the Perris General Plan and the PVCCSP. The proposed Specific Plan Amendment would allow the development of a self-storage facility within the Commercial land use designation per the PVCCSP. Therefore, with approval of the proposed Specific Plan Amendment, the Project development would be consistent with the land use and zoning designations for the site and would comply with other applicable PVCCSP standards and guidelines.

Additionally, the Project would be consistent with the City's General Plan policies related to avoiding environmental impacts, as discussed in Table 3 of the Initial Study. Therefore, potential impacts would be less than significant.

7.1.10 Mineral Resources

a) Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Department of Conservation classifies the availability of mineral resources in a region into one of four mineral resource zone (MRZ) categories. According to the City of Perris General Plan Conservation Element, the Department of Conservation is primarily interested in the preservation of significant resources in MRZ 2 regions. The land within the City, including the Project site, is classified as MRZ 3 and MRZ 4, which are not considered to be significant mineral resource areas (City 2005). Therefore, implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impacts to mineral resources would occur.

b) Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. As stated above, the General Plan Conservation Element does not consider the Project site to be a significant mineral resource area. Additionally, the Project site is not used for mineral extraction and is not known as a locally important mineral resource recovery site. Further, the Project site is not delineated on any plan for mineral resource recovery uses. No impacts to mineral resource availability would occur.

7.1.11 Noise

a) Would the Project generate 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?

Less Than Significant Impact. The City's Municipal Code restricts construction to the hours of 7:00 am to 7:00 pm on any day except Sundays or applicable holidays and limits construction noise levels to a maximum noise level (L_{MAX}) of 80 A-weighted decibels (dBA) in residential zones. The Project would generate temporary increases in noise during construction. However, the Project would comply with the Municipal Code restrictions on construction hours, except during the potential nighttime paving activities, when prior approval from the City would be required. Construction noise would not exceed the 80 dBA L_{MAX} threshold for ambient noise increases. Therefore, Project construction would not result in a temporary increase in ambient noise levels in excess of the applicable standards and impacts would be less than significant. Although impacts from construction noise would be less than significant, the Project would be required to comply with PVCCSP EIR mitigation measures MM Noise 1 through MM Noise 4, which would further limit noise generated by construction equipment.

The Project's proposed gas stations, car wash, courtyard, drive-through operations, trash enclosure, storage, and parking lot would generate elevated noise levels compared to existing conditions. However, onsite According to the Project's Noise and Vibration Analysis (Appendix I of Appendix A), operation of the Project would not result in noise levels exceeding applicable standards and would not result in a substantial permanent increase in ambient noise levels. Noise levels generated by traffic on Ramona Expressway would increase by 0.2 dBA CNEL with the addition of Project traffic to existing conditions. This increase would not be a perceptible increase and would not exceed the PVCCSP EIR significance criteria. Traffic noise increases for other roadways in the Project vicinity would be less than those for this segment of Ramona Expressway. Therefore, noise impacts from onsite Project operations and Project-generated traffic would be less than significant.

b) Would the Project generate excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The maximum acceptable vibration threshold identified in the PVCCSP EIR is 0.5 inch per second peak particle velocity (PPV). Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be conducted by the Project. The largest possible source of vibration during general Project construction activities would be a vibratory roller used for gravel or pavement compaction. At 94 feet, the distance to the nearest off-site building, a vibratory roller could generate up to 0.012 inch per second PPV (Appendix I of Appendix A), which is lower than both the "strongly perceptible" level for human response of 0.1 inch per second PPV (Caltrans 2020) and the structural damage threshold of 0.5 inch per second PPV. Therefore, temporary impacts associated with construction vibration would be less than significant. No substantial sources of vibration would be installed for operation of the Project. Impacts would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. The nearest airports to the proposed Project site are MARB/IPA and the Perris Valley Airport. According to the ALUCP for the Perris Valley Airport, the Project site is not located

within the Airport Influence Area Boundary (County of Riverside 2011). However, the proposed Project site is located within the limits of the MARB/IPA ALUCP area and the AICUZ study area. The Project site falls outside of the 60 dBA CNEL noise contour identified in the AICUZ study (MARB 2018). The City General Plan states that commercial uses are normally compatible with noise levels up to 65 dBA CNEL and conditionally compatible with noise levels up to 75 dBA CNEL. The Project would therefore not result in excessive airport noise exposure. Potential impacts would be less than significant.

7.1.12 Population and Housing

a) Would the Project 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)?

Less Than Significant Impact. The proposed Project does not include residential development and would not directly affect the number of residents in the area or contribute to the creation of additional housing within the City. The Project includes uses that would not be of a magnitude to support additional population growth in the area, as the uses are considered local serving land uses. The proposed Project would include commercial uses to serve the existing population, such as gas stations, restaurants, and a storage facility. Therefore, since the Project would serve the existing population and has no other features that would directly or indirectly induce growth, potential impacts would be less than significant and no mitigation would be required.

b) Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project site is vacant land that is not currently used for housing. The proposed Project would not remove any existing housing units and would not displace substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere. There would be no impacts associated with displacing people.

7.1.13 Public Services

a) 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:

i. Fire protection?

Less Than Significant Impact. The proposed Project would include the construction and operation of commercial uses that would require fire protection services; however, no new residential uses or other uses that would increase the City's population would be involved. In compliance with Perris Municipal Code Section 19.68.020, *Development Impact Fees*, the Project applicant would be required to pay a development impact fee to fund the acquisition, design, and construction of public facilities, including fire protection facilities, necessary to serve new development within the City. Payment of the fee would be required prior to issuance of a building permit and would provide for the Project's fair share cost contribution to facilities and equipment due to the increased demand for fire protection services.

In addition, the Project would be required to comply with all applicable Building and Fire Code requirements and would submit construction plans for review and approval prior to issuance of any building permit. Implementation of all Fire Code requirements would further reduce potential impacts concerning fire protection services. Therefore, potential impacts would be less than significant.

ii. Police protection?

Less Than Significant Impact. The proposed Project would include the construction and operation of planned commercial land uses that would require police protection services; however, no new residential uses or other uses that would increase the City's population would be involved. The Project would also not represent a use that would require unique or expanded police protection services. However, the Project would pay a development impact fee that would provide for the Project's fair share cost contribution to facilities and equipment due to the increased demand for police protection services in the City. Further, as part of the development review process, Riverside County Sheriff's Department would review the Project and provide comments regarding risks to security and ways to minimize those risks. Therefore, potential impacts would be less than significant.

iii. Schools?

Less Than Significant Impact. The proposed Project involves the construction and operation of commercial facilities. It is not anticipated to introduce new residents to the Project site that would generate new students and require additional schools. As a result, the Project itself is not expected to require the construction of new or expanded school facilities; however, the Project applicant would be required to pay school impact fees to the Val Verde Unified School District in accordance with SB 50. Developer fees collected by local school districts pursuant to SB 50 are used for the provision of additional and reconstructed or modernized school facilities. Therefore, potential impacts related to schools would be less than significant.

iv. Parks?

No Impact. The proposed Project would not result in substantial increases in population and is not anticipated to result in increased use or demand on parks that would require the construction or expansion of additional park and recreational facilities. Therefore, there would be no impact.

v. Other public facilities?

No Impact. Other public facilities may include libraries, senior centers, community centers, and pools, all of which are intended to serve the general public. The proposed Project involves the construction and operation of commercial uses that would not result in increased population resulting in increased demand for these services that would require the construction or expansion of other public facilities. Therefore, there would be no impact.

7.1.14 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?

No Impact. The proposed Project consists of construction and operation of commercial uses. The Project would not increase the use of or create the need for new parks and recreational facilities. Similarly, the

proposed Project would not result in physical deterioration of an existing open space area or any recreation facilities. Therefore, there would be no impact.

b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The proposed Project does not include recreational facilities with the exception of pedestrian elements providing access to the Project site. The Project would not require or result in the need to construct or expand recreational facilities in the City. Therefore, there would be no impact.

7.1.15 Transportation

a) Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. A Traffic Analysis has been prepared for the Project (Appendix J of Appendix A) in accordance with PVCCSP EIR mitigation measure MM Trans 7 and the improvements required to satisfy the remaining PVCCSP EIR mitigation measures are contained therein and have been incorporated into the Project. To further evaluate if the Project would conflict with existing circulation plans, or effectiveness of circulation, a traffic signal warrant analysis was conducted by Urban Crossroads and summarized in the Traffic Analysis. Traffic signal warrants for existing traffic conditions are based on existing peak hour intersection turning volumes. There are no applicable study area intersections that may warrant a traffic signal for existing traffic conditions. The proposed Project would include site access and roadway improvements to Ramona Expressway and Webster Avenue. The City's Circulation Element recommends a Class IV bike lane along the site's Ramona Expressway frontage and a Class II bike lane along the site's Webster Avenue frontage. Sufficient right-of-way is reserved along the Ramona Expressway frontage of the site such that a bike lane could be striped in the future. Therefore, the Project would not conflict with or preclude implementation of recommended bicycle lane improvements in the future. Further, a meandering walkway would be installed along the Project's Ramona Expressway frontage. The Project would implement improvements consistent with PVCCSP, General Plan Circulation Element, and PVCCSP mitigation measure requirements, and the Project would not conflict with circulation plans or policies. Impacts would be less than significant.

b) Would the Project conflict or be inconsistent with State CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. The proposed Project's VMT impact has been assessed in accordance with guidance from the City of Perris Transportation Impact Analysis Guidelines for CEQA. The transportation guidelines provide a framework for "screening thresholds" for when a project is expected to cause a less than significant impact without conducting a detailed VMT study. The Project components meet the Local-Serving Land Use screening criteria and the self-storage component meets the less than 500 net daily trips criteria (Appendix K of Appendix A). Therefore, a detailed VMT study is not required and impacts related to VMT would be less than significant.

c) Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The Project site is within the influence area of MARB/IPA and does not include design features that would increase traffic hazards. The Project is consistent with the onsite and

surrounding land use and zoning designations, and implementation of the Project would not introduce incompatible uses to the Project site. Improvements related to safety contained in PVCCSP EIR mitigation measure MM Trans 2 would ensure that adequate site distance is provided at each Project access location. Additionally, prior to the issuance of final occupancy, City staff would ensure that signing/striping are implemented in conjunction with the detailed construction plans for the Project site and off-site improvement area. The Project incorporates circulation design recommendations and would not create dangerous curves our intersections. During construction, the proposed Project would comply with all local regulations regarding temporary road closures and/or one-way traffic controls. Impacts would be less than significant.

d) Would the Project result in inadequate emergency access?

Less Than Significant Impact. A significant impact would occur if the design of the proposed Project would not satisfy emergency access requirements of the Riverside County Fire Department or in any other way threaten the ability of emergency vehicles to access and serve the Project site or adjacent uses. The proposed Project would not result in inadequate emergency access. Site access for personal vehicles would be provided via four driveways along Ramona Expressway and two driveways along Webster Avenue. Driveways 2 and 4 along Ramona Expressway and Driveway 6 along Webster Avenue would be right-in/right-out driveways, while the remaining driveways would be full access driveways. The driveways are of standard size to accommodate passenger cars and trucks. All access features are subject to the City of Perris design requirements, including the Fire Department's requirement of a minimum 20-foot width for driveways. Because of this, emergency vehicles would be able to access the Project site. Impacts associated with this issue would be less than significant.

7.1.16 Tribal Cultural Resources

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)?

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant with Mitigation Incorporated. There are no known tribal cultural resources present within the Project site and the contacted Tribes did not request monitoring at the site. Therefore, no change in the significance of tribal cultural resources is anticipated to occur as a result of the Project. However, a qualified archaeologist would be retained to serve as the Project Archaeologist in accordance with Project mitigation measure MM CR 1. Project mitigation measure MM CR 1, provided in Section V, implements PVCCSP EIR mitigation measures MM Cultural 2 through MM Cultural 4, as subsequently revised by the City of Perris. In the unlikely event that human remains are discovered during construction, all activities in the vicinity of the remains would cease and the NAHC would be

contacted pursuant to California Health & Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and Project mitigation measure MM CR 2. In accordance with the requirements of AB 52, the City, as the Lead Agency, will notify the tribes identified by the NAHC and provide the proposed mitigation to review. With completion of consultation pursuant to Assembly Bill 52 and implementation of Project mitigation measures MM CR 1 and MM CR 2, potential impacts to tribal cultural resources would be less than significant.

7.1.17 Utilities and Service Systems

a) Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. The Project site is located adjacent to existing industrial and commercial development that require utility connections similar to those necessary to serve the Project. Therefore, the Project's utility improvements primarily consist of off-site connections within developed roadways and onsite improvements to connect utilities to each of the proposed buildings as needed. No additional improvements are needed to existing water lines, sewer lines, or treatment facilities to serve the Project. Standard connection fees would address any incremental impacts of the Project. Electric, natural gas, and telecommunications connections would occur east of Webster Avenue and would be pulled throughout the Project site. The Project applicant would be required to provide all necessary onsite infrastructure and pay applicable connection fees. Impacts would be less than significant.

b) Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. Operation of the proposed Project would result in increases in potable water demand. City residents and businesses are served by the EMWD. Based on the PVCCSP EIR water demand assumption of 0.75 acre feet per year per acre of commercial and industrial development, the proposed Project's estimated water demand is approximately 15.21 acre feet per year, which is within the anticipated water demand increase for EMWD. According to the 2020 Urban Water Management Plan for EMWD, there is sufficient supply to accommodate demand under normal and single- and multiple-dry year conditions utilizing imported water. Local supplies would supplement imported supplies and provide additional supply reliability. Local supplies include groundwater pumped from the San Jacinto groundwater Basin, desalinated groundwater, and recycled water. Therefore, the EMWD would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

c) Would the Project result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. Wastewater in the City is treated by the EMWD at the Perris Valley Regional Water Reclamation Facility, which has a current treatment capacity of 6.5 million gallons per day (EMWD 2021). According to the PVCCSP EIR wastewater generation assumption of 1,700 gallons per day per acre of commercial development, the proposed Project's total estimated water consumption is approximately 34,476 gallons per day, which would be the maximum potential wastewater generated at the site. This volume is within the Perris Valley Regional Water Reclamation Facility's remaining

treatment capacity of 6.5 million gallons per day. This Project would not inhibit the ability of the Perris Valley Regional Water Reclamation Facility to operate within its established wastewater treatment requirements. Therefore, the proposed Project would have a less than significant impact related to wastewater treatment.

d) Would the Project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Significant impacts could occur if the proposed Project would exceed the existing permitted landfill capacity or if it would violate federal, state, and local statutes and regulations. Overall, the amount of solid waste produced as a result of this Project is negligible compared to the capacity available at the two primary landfills, El Sobrante Landfill and the Badlands Landfill, which have a combined remaining capacity of 151,777,170 tons (California Department of Resources Recycling and Recovery 2024). Compliance with Riverside County waste reduction programs and policies would also reduce the volume of solid waste entering landfills. Individual development projects within Riverside County would be required to comply with applicable state and local regulations, thus reducing the amount of landfill waste by at least 50 percent. Therefore, because there would be adequate landfill capacity in the region to accommodate Project-generated waste, and the proposed Project is not expected to generate a substantial quantity of solid waste, the impact would be less than significant.

e) Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

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. The proposed Project would comply with all regulatory requirements regarding solid waste. Impacts would be less than significant.

7.1.18 Wildfire

a) Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

b) Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c) Would the Project 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?

d) Would the Project 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?

No Impact. According to Figure S-05, Wildfire Hazards, of the City General Plan Safety Element, the Project site is located within a Local Responsibility Area and is not located in or near an area identified as a VHFHSZ (City 2021). The Project site is not within a State Responsibility Area. Therefore, the Project

would have no impacts related to wildfires or the associated issues identified in thresholds a through d, above. No impacts would occur.

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Appendix A

Notice of Preparation, Initial Study, and Notice of Preparation Responses

Appendix B

Air Quality Impact Analysis

Appendix C

Greenhouse Gas Analysis