6. Other CEQA Considerations

6.1 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(c) requires an EIR to describe "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance." The analysis throughout Section 5 of this Draft EIR determined that the Project would result in environmental impacts that cannot be reduced to a level below significance after implementation of Project design features; regulatory requirements; plans, programs, policies; and feasible mitigation measures. The significant impacts that cannot be mitigated to a level below significance are summarized below:

6.1.1 Air Quality

Impact AQ-1, Conflict with AQMP. Land use change associated with the Specific Plan Amendment would result in VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ emission exceedances that would result in significant and unavoidable air quality impacts despite the implementation of all feasible mitigation measures. The land use change associated with the Project would increase summer VOC and $PM_{2.5}$ and year-round NOx and SOx emissions compared to the previously approved land uses. Therefore, the Project would result in a conflict with, or obstruct, implementation of the applicable Air Quality Management Plan.

Impact AQ-2, Regional Construction & Operational Emissions (Project-level and Cumulative). Emissions from construction of Phase 1 and Specific Plan Buildout would exceed the South Coast AQMD's thresholds of significance for NOx after implementation of regulatory requirements and mitigation measures. Therefore, construction-source NOx emissions would be significant and unavoidable on a Project-level and a cumulative basis.

Emissions from operation of Phase 1 would exceed the South Coast AQMD's thresholds of significance for VOC, NOx, CO, and PM_{10} after implementation of regulatory requirements and mitigation measures. Emissions from operation of Phase 2 would exceed the South Coast AQMD's thresholds of significance for VOC and NOx after implementation of regulatory requirements and mitigation measures. Emissions from Specific Plan Buildout would exceed the South Coast AQMD's thresholds of significance for VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ after implementation of regulatory requirements and mitigation measures. A majority of operational-source emissions (by weight) would be generated by Project vehicles that neither the Project applicant nor the City have the have regulatory authority to control. Therefore, operational-source VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ emissions would be significant and unavoidable on a Project-level and a cumulative basis.

6.1.2 Greenhouse Gas Emissions

Impact GHG-1, Greenhouse Gas Emissions (Project-level and Cumulative). Specific Plan buildout would generate a net total of approximately 109,258.10 $MTCO_2e$ per year in the most conservative scenario, thereby exceeding the threshold of 3,000 $MTCO_2e$ per year. As with Impact AQ-2, the majority of the GHG emissions would be from mobile sources that neither the Project applicant nor the City have the have regulatory authority to control. With implementation of all feasible mitigation, Specific Plan buildout would generate a net total of approximately 105,503.05 $MTCO_2e$ per year in the most conservative scenario, which assumes a longer trip length (Scenario B) and redevelopment of the Overlay area. Therefore, despite implementation of all feasible mitigation, GHG emissions would be significant and unavoidable on a project-level and cumulative basis.

Impact GHG-2, Conflict with GHG Reduction Plan (Project-level and Cumulative). As the proposed Project would generate a net total of approximately 109,258.10 $MTCO_2e$/yr in the most conservative scenario, which assumes a longer trip length (Scenario B) and redevelopment of the Overlay area, the Project would conflict with the CARB 2022 Scoping Plan. Therefore, despite implementation of all feasible mitigation, GHG emissions would be significant and unavoidable on a project-level and cumulative basis.

6.1.3 Noise

Impact NOI-1, Off-Site Traffic Noise (Project-level and Cumulative). Phase 1 Opening Year 2026 cumulative traffic noise levels would range from 64.3 to 75.3 dBA CNEL and traffic noise increases would range from 0.1 to 8.0 dBA CNEL. Phase 2 Opening Year 2030 cumulative traffic noise levels would range from 67.1 to 77.4 dBA CNEL and traffic noise increases would range from 0.1 to 9.9 dBA CNEL. General Plan Buildout (2045) cumulative traffic noise levels would range from 67.1 to 77.4 dBA CNEL and traffic noise increases would range from 0.1 to 8.7 dBA CNEL. Traffic noise levels would exceed significance thresholds at sensitive uses on Barrett Avenue between Orange Avenue and Placentia Avenue. As further described in Section 5.12, *Noise*, due to the nature of traffic noise from trucks, no feasible mitigation exists to reduce impacts to a less-than-significant level. Therefore, noise level increases associated with off-site traffic in relation to the Project would be significant and unavoidable on a project-level and cumulative basis.

6.1.4 Transportation

Impact TR-2, Vehicle Miles Traveled (Project-level). The existing City of Perris baseline VMT/Service Population is 32.2 VMT/Service Population. A project would result in a significant project generated VMT impact it the project VMT exceeds 32.2 VMT/Service Population. As shown in Table 5.16-6, the VMT/SP for the Commercial portion of Phase 1 would be 111.53 percent above the threshold under Project Baseline (2024) conditions and 108.55 percent above the threshold under General Plan buildout (2045) conditions. As shown in Table 5.16-8, the VMT/SP for buildout of the Specific Plan would be 14.12 percent above the threshold under Project Baseline (2024) conditions and 18.27 percent above the threshold under General Plan buildout (2045) conditions. Table 5.16-9 shows that with implementation of the design features and mitigation measures, the commercial component of Phase 1 would still have a VMT/SP that is 98.59 percent above the threshold in Baseline (2024) conditions and 95.91 percent above the threshold during General Plan buildout (2045) conditions. Table 5.16-10 shows that with implementation of the design features and mitigation measures, buildout of the Specific Plan would still result in a VMT/SP that is 1.18 percent above the threshold in Baseline (2024) conditions and 5.33 percent above the threshold during General Plan buildout (2045) conditions. Therefore, despite implementation of mitigation measures, impacts related to VMT from the commercial component of Phase 1 and buildout of the Specific Plan would be significant and unavoidable.

6.2 GROWTH INDUCEMENT

CEQA Guidelines Section 15126.2(e), *Growth Inducing Impact of the Proposed Project*, requires that an EIR "discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." The CEQA Guidelines also indicate that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. In general terms, a project may foster spatial, economic, or population growth in a geographic area, if it meets any one of the following criteria:

1. Directly or indirectly foster economic or population growth, or the construction of additional housing, in the surrounding environment;

2. Remove obstacles to population growth;
3. Require the construction of new or expanded facilities that could cause significant environmental effects; or
4. Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

1. Does the Project directly or indirectly foster economic or population growth or the construction of additional housing?

Growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in master plans, land use plans, or in projections made by regional planning agencies, such as the Southern California Association of Governments (SCAG). The Project would contribute to the economic and population growth in the City of Perris and the surrounding areas. As further discussed in Section 5.13, *Population and Housing*, of this Draft EIR, the growth would not be unexpected or constitute substantial unplanned growth. According to regional population projections included in C*onnect SoCal 2024,* the City of Perris is projected to increase its population by 86 percent (2.77% annually) and its housing stock by 86 percent (2.77% annually) by 2050 (between 2019 and 2050) (SCAG, 2024). Over this same time period, employment in the City is also expected to increase by 82 percent (2.65% annually).

While the Project would contribute to employment growth through the proposed development within the Specific Plan Area, the Project proposes a Specific Plan Amendment to the Harvest Landing Specific Plan to allow development within areas designated as MBU up to a floor area ratio (FAR) of 0.75 and areas designated as Commercial up to a FAR of 0.75 within the Phase 1 and Phase 2 Planning Areas, which is consistent with the densities allowed in the City of Perris General Plan. The 6,427 jobs that would occur from full buildout of the Specific Plan would be 43 percent of the anticipated growth in employment in the City; and therefore, consistent with SCAG projections and not result in unplanned growth. Thus, implementation of the proposed Project would be within the growth projections based on the City of Perris General Plan and SCAG's growth projections.

The proposed Project may cause indirect economic growth as it would generate revenue for the City through taxes generated by the development. Additionally, employees (short-term construction and long-term operational employees) from the Specific Plan Area would purchase goods and services in the region, but any secondary increase in employment growth associated with meeting these incremental demands would be marginal, as these goods and services could be accommodated by existing providers and providers that would be included within the commercial components of the Project. The Project is highly unlikely to result in any new or additional physical impacts to the environment based on the amount of existing and planned future commercial and retail services, which can serve Project employees, that are available in areas near the Specific Plan Area. As such, it is highly unlikely that additional commercial or retail services would be required to meet Project demands.

Although, the proposed Project would create approximately 6,427 jobs, a majority of which could likely be filled by residents of Perris, unincorporated Riverside County, and the surrounding areas. Employees would live in housing either already built or planned for development in Perris or unincorporated Riverside County and the surrounding areas. Because it is anticipated that most of the future Project employees would already be living in the Perris area, the Project's introduction of employment opportunities would not induce substantial growth in the area and cause the need for additional housing.

The Project would implement economic activity that would result in an improvement in the jobs-household ratio by providing employment within the housing-rich City of Perris, which is a benefit of the Project. In addition, the location of the new employment opportunities would be easily accessible from I-215 and would also accommodate employees in surrounding areas. The City of Perris has had unemployment rates ranging between 4.3 (1,332) and 17.9 (5,584) percent over the last 10 years and an unemployment rate of 5.7

percent (1,846) as of May 2024 (EDD, 2024; BLS, 2024). Most of the new jobs that would be created by the Project would be positions that do not require a specialized workforce, and this type of workforce exists in the City of Perris and surrounding communities. Thus, due to existing unemployment and the availability of a workforce, it is anticipated that new jobs that would be generated from Project implementation would be filled by people within the City of Perris and surrounding communities and would not induce an unanticipated influx of new labor into the region or the need for additional housing. Thus, the Project would not result in the influx of new labor to serve the increased economic activities that would result from implementation of the Project.

2. Does the Project remove obstacles to population growth?

The elimination of a physical obstacle to growth is considered to be a growth inducing impact. A physical obstacle to growth typically involves the lack of public service infrastructure. The Project would induce growth if it would provide public services or infrastructure with excess capacity to serve lands that would otherwise not be developable. The proposed Project involves expanding existing infrastructure to support the full development of the Specific Plan Area. This includes the installation of onsite sewer lines within the community shopping center, connecting to a 12-inch sewer line on Orange Avenue, as well as the construction of a new 15-inch sewer line along Perris Boulevard. Phase 1 of the development would require the construction of new 8-inch waterlines along Barrett Way, Orange Avenue, Frontage Road, and Walmart Supercenter Drive. In terms of stormwater drainage, Phase 1 will feature a 12.91-acre water quality management basin and the installation of new storm drain lines along Perris Boulevard, Barrett Avenue, and Orange Avenue, including an 84-inch diameter storm drain line along Orange Avenue. The Project also includes the improvement of several roadways to their ultimate width, such as Orange Avenue, Perris Boulevard, and Barrett Avenue, and the construction of new roadways Harvest Landing Way and Private Drive A to facilitate traffic flow. Additionally, new water, sewer, and stormwater systems will be installed to connect with existing infrastructure in surrounding roadways to meet the demands of the Project. The Project does not propose extending roads into undeveloped areas but focuses on enhancing existing infrastructure to accommodate the proposed development.

As discussed in Section 5.18, *Utilities and Service Systems*, the Project would result in an annual water demand of 561.68 acre-feet per year, which is within the projected demand calculated for the Specific Plan Area by the EMWD 2020 UWMP. Full buildout of the Specific Plan would utilize approximately 46 percent of the Perris Valley Regional Water Reclamation Facility's current daily excess treatment capacity and approximately 3.5 percent the facility's ultimate capacity of 100 million gallons per day. As such, the Project's wastewater demand would be within the Perris Valley Regional Water Reclamation Facility's current and ultimate daily excess treatment capacity. The proposed stormwater infrastructure would be designed to convey all runoff to remain onsite at a rate similar to pre-project conditions. The proposed infrastructure improvements have been designed to serve only the demands of the Project. Therefore, the Project would not result in significant growth inducing impacts.

3. Does the proposed Project require the construction of new or expanded facilities that could cause significant environmental effects?

Growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services that requires the construction of new public service facilities, or if it can be demonstrated that the potential growth significantly affects the environment in some other way. The proposed Project would slightly increase the demand for fire protection, emergency response, and sheriff protection. However, as described in Section 5.14, *Public Services*, the proposed Project would not require development of additional facilities or expansion of existing facilities to maintain existing levels of service for public services. Based on service ratios and build out projections, the proposed Project would not create a demand for services beyond the capacity of existing facilities. While the Riverside County Fire Department fire stations do not currently meet the existing fire service needs within the City, this is due to

the fire service needs and lack of fire station within the southern portion of the City. The City is currently looking to acquire land in the southern portion of Perris to construct a new fire station (Kenneth Phung, Development Services Director, personal communication, January 7, 2025). Construction of a station within the southern portion of the City is expected to alleviate the existing service deficiencies. Since the Project does not propose the construction or expansion of a new station, disclosure of potential impacts related to the future fire station as part of this EIR would be speculative, as there are no concrete plans at this time. Future construction and operation of the new fire station would be subject to City policies that are designed to protect environmental resources as well as environmental review pursuant to CEQA to determine whether adverse physical effects on the environment would occur.

Therefore, an indirect growth inducing impact as a result of expanded or new public facilities that could support other development in addition to the proposed Project would not occur. The proposed Project would be subject to Development Impact Fees established by City Ordinance No.1182 which requires the payment of fees proportional to the amount of development proposed in order to offset potential public service improvements required to support the Project. Thus, the fees would only account for the improvement of public facilities in relation to the proposed Project and would not result in other improvements that would result in any indirect growth. The proposed Project would not have significant growth inducing consequences that would require the need to expand public services to maintain desired levels of service.

4. Does the Project encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively?

Similar to the surrounding cities, the City of Perris is in the process of transitioning from its historical use of low-density residential and agricultural uses to more dense industrial uses and other urbanized uses as planned in the City of Perris General Plan and Perris Valley Commerce Center Specific Plan, and through the construction of multiple industrial developments, residential developments and other types of development. Areas to the north of the Project site are developed with non-conforming residential uses and various light industrial uses. Areas to the east of the Project site are developed with commercial uses, multi-family residential uses, and single-family residences. Areas to the south are developed with commercial uses. Areas to the west are developed with I-215 followed by light industrial uses. As such, while the Project could spur increased development in the surrounding areas, these areas are already developed or are slated for future development. Further, the proposed infrastructure improvements, including the roadway, water, sewer, and storm drain improvements, are only sized to serve the Project and would not have capacity to serve additional development projects in the area. The Project would not individually or cumulatively encourage or facilitate substantial growth.

6.3 SIGNIFICANT IRREVERSIBLE EFFECTS

CEQA Guidelines require the EIR to consider whether "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…. 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." (CEQA Guidelines Section 15126.2(d)). "Nonrenewable resource" refers to the physical features of the natural environment, such as land, waterways, mineral resources, etc. These irreversible environmental changes may include current or future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;

- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed irretrievable commitments of nonrenewable resources is not justified (e.g., the project involves the wasteful use of energy).

The Project would result in or contribute to the following irreversible environmental changes:

- Lands in the Project site would be committed to MBU and Commercial uses once the proposed buildings are constructed. Secondary effects associated with this irreversible commitment of land resources include:
    - Changes in views associated with construction of the new buildings and associated development (Section 5.1, *Aesthetics)*
    - Increased traffic on area roadways (see Section 5.16, *Transportation*).
    - Emissions of air pollutants associated with Project construction and operation (see Section 5.3, *Air Quality*).
    - Consumption of non-renewable energy associated with construction and operation of the proposed Specific Plan due to the use of automobiles, trucks, lighting, heating and cooling systems, appliances, etc. (see Section 5.6, *Energy*).
    - Increased ambient noise associated with an increase in activities and traffic from the Project (see Section 5.12, *Noise*).

- Construction of the proposed Project as described in Section 3.0, *Project Description*, would require the use of energy produced from non-renewable resources and construction materials.

In regard to energy usage from the proposed Project, as demonstrated in the analyses contained in Section 5.6, *Energy*, the proposed Project would not involve wasteful or unjustifiable use of non-renewable resources, and conservation efforts would be enforced during construction and operation of proposed development. The proposed development would incorporate energy-generating and conserving Project design features, including those required by the California Building Code, California Energy Code Title 24, which specify green building standards for new developments. Further, the Project buildings would be designed to achieve LEED Silver certification, as required by Mitigation Measure GHG-4. In addition, as listed in Section 3.0, *Project Description,* Section 5.6, *Energy*, and Section 5.8, *Greenhouse Gas Emissions*, the proposed Project would include sustainability features in line with Title 24 requirements that result in additional energy-efficiency. Project specific information related to energy consumption is provided in Section 5.6, *Energy*, of this EIR. In addition, the Project would not result in irreversible damage that could result from any potential environmental accidents as associated with the Project.

6.4 REFERENCES

California Employment Development Department (EDD). (n.d.). *Local Area Unemployment Statistics (LAUS)*. https://data.edd.ca.gov/Labor-Force-and-Unemployment-Rates/Local-Area-Unemployment-Statistics-LAUS-/e6gw-gvii/data

Southern California Association of Governments (SCAG). (2024). *Demographics and Growth Forecast Technical Report*. Retreived on July 29, 2024 at: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839.

U.S. Bureau of Labor Statistics (BLS). (2024). *BLS Data Finder*. https://beta.bls.gov/dataQuery/search