CEQA FINDINGS OF FACT
FOR THE
HARVEST LANDING RETAIL CENTER & BUSINESS PARK PROJECT
CITY OF PERRIS, CALIFORNIA
STATE CLEARINGHOUSE NO. 2024080337

SECTION I

INTRODUCTION

Findings of Fact

Public Resources Code Section 21002 states that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" Section 21002 further states that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which would avoid or substantially lessen such significant effects."

Agencies demonstrate compliance with Section 21002's mandate by adopting findings before approving projects for which EIRs are required. (See Pub. Resources Code, § 21081, subd. (a); State CEQA Guidelines § 15091, subd. (a).) The approving agency must make written findings for each significant environmental effect identified in an EIR for a proposed project and must reach at least one of three permissible conclusions.

- The first possible finding is that "[c]hanges or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (State CEQA Guidelines § 15091, subd. (a)(1).)
- The second permissible finding is that "[s]uch changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding" and that "[s]uch changes have been adopted by such other agency or can and should be adopted by such other agency." (State CEQA Guidelines § 15091, subd. (a)(2).)
- The third potential conclusion is that "[s]pecific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR." (State CEQA Guidelines § 15091, subd. (a)(3).)

Agencies must not approve a project with significant environmental impacts if feasible alternatives or mitigation measures would substantially lessen the significant impacts. Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors." State CEQA Guidelines section 15364 adds "legal" considerations as another indicium of feasibility (See also *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 565). Project objectives also inform the determination of "feasibility." (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417.) Further, "'feasibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (*Id.*; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) An agency need not, however, adopt *infeasible* mitigation measures or alternatives (State CEQA Guidelines § 15091, subds. (a), (b). Further, environmental impacts that are less than significant do not require the imposition of mitigation measures (*Leonoff v. Monterey County Board of Supervisors* (1990) 222 Cal.App.3d 1337, 1347).

Notably, Section 21002 requires an agency to "substantially lessen or avoid" significant adverse environmental impacts. Thus, mitigation measures that "substantially lessen" significant environmental impacts, even if not completely avoid them, satisfy Section 21002's mandate. (*Laurel Hills Homeowners Assn. v. City*

Council (1978) 83 Cal.App.3d 515, 521 ("CEQA does not mandate the choice of the environmentally best feasible project if through the imposition of feasible mitigation measures alone the appropriate public agency has reduced environmental damage from a project to an acceptable level"); *Las Virgenes Homeowners Federation, Inc. v. County of Los Angeles* (1986) 177 Cal.App.3d 300, 309 ("[t]here is no requirement that adverse impacts of a project be avoided completely or reduced to a level of insignificance . . . if such would render the project unfeasible").

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modification or alternatives are not required, however, where such changes are infeasible or where the responsibility for modifying the project lies with some other agency. (State CEQA Guidelines § 15091, subds. (a), (b). The California Supreme Court has stated, "[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed and therefore balanced." (*Citizens of Goleta Valley v. Board of Supervisors, supra,* 52 Cal.3d at p. 576).

The City of Perris has determined that based on all the evidence presented, including, but not limited to, the Final EIR, written and oral testimony given at meetings and hearings on the Project, and submission of testimony from the public, organizations and regulatory agencies, the following environmental impacts associated with the Project are either:

(1) Less than significant and do not require mitigation;

(2) Potentially significant and each of these impacts would be avoided or reduced to a level of insignificance through the identified mitigation measures; or

(3) Significant and unavoidable impacts that, despite the incorporation of feasible measures, cannot be fully mitigated to a less-than-significant level.

Record of Proceedings

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed Project consists of the following documents and other evidence, at a minimum:

- The Notice of Preparation (NOP) and all other public notices issued by the City in conjunction with the proposed Project;
- The Final EIR (includes Draft EIR) for the proposed Project;
- All written comments submitted by agencies and members of the public during the public review comment periods on the Draft EIR;
- All responses to written comments submitted by agencies and members of the public during the public review comment period on the Draft EIR;
- The Mitigation Monitoring and Reporting Program (MMRP);
- The reports and technical memoranda included or referenced in the Response to Comments of the Final EIR;
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft EIR and Final EIR;
- The Ordinances and Resolutions adopted by the City in connection with the proposed Project, and all documents incorporated by reference therein;
- Matters of common knowledge to the City, including but not limited to federal, State, and local laws and regulations;
- Any documents expressly cited in these Findings; and

- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e).

Document Format

These Findings have been organized into the following sections:

Section I Provides an introduction to these Findings.

Section II Provides a summary of the Project and overview of the discretionary actions required for approval of the Project, and a statement of the Project's objectives.

Section III Provides a summary of previous environmental reviews related to the Project area that took place prior to the environmental review done specifically for the Project, and a summary of public participation in the environmental review for the Project.

Section IV Sets forth findings regarding environmental impacts identified in the EIR which were determined not to be significant.

Section V Sets forth findings regarding environmental impacts identified in the EIR which can feasibly be mitigated to a less-than-significant level through the imposition of project design features, regulatory requirements, and/or mitigation measures. In order to ensure compliance and implementation, all of these measures are included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project which shall be adopted by the City together with these Findings in accordance with CEQA Section 21081.6. Where potentially significant impacts can be reduced to less-than-significant levels through adherence to project design features and regulatory requirements, these findings specify how those impacts were reduced to an acceptable level.

Section VI Sets forth findings regarding environmental impacts identified in the EIR which were determined to be significant and unavoidable.

Section VII Sets forth findings regarding growth inducing impacts.

Section VIII Sets forth findings regarding significant irreversible effects.

Section IX Sets forth findings regarding alternatives to the proposed Project.

Section X Certification of the EIR.

Section XI Sets forth findings regarding the Mitigation Monitoring and Reporting Program.

Section XII Statement of Overriding Considerations.

Section XIII Provides the contents and custodian records.

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SECTION II

PROJECT SUMMARY

Project Location

The Project site is located within the central portion of the City of Perris. The City of Perris is located within Riverside County, approximately 24 miles south of downtown San Bernardino, 35 miles east of Irvine, and 62 miles southeast of downtown Los Angeles. Regional access to the site is provided via Interstate 215 (I-215) and State Route 74 (SR-74). Figure 3-1, *Regional Location,* and Figure 3-2, *Local Vicinity,* of the Draft EIR, show the site from regional and local perspectives.

The Project site includes approximately 358.28 acres and is generally bounded by I-215 to the west, Perris Boulevard to the east, Nuevo Road to the south, and Placentia Avenue to the north. The Project site includes the current Harvest Landing Specific Plan (Specific Plan) area and three parcels proposed to be annexed into the Specific Plan.

The Project site consists of two phase areas and an overlay area, which include the Assessor's Parcel Numbers (APNs) listed in Table 3-1 of the Draft EIR.

Existing Harvest Landing Specific Plan

In 2011, the City of Perris City Council adopted the Harvest Landing Specific Plan, which is a master-planned community, including residential, recreation, and general business and commercial land uses on approximately 341 acres in western Perris. Further, the City Council certified the Harvest Landing Specific Plan EIR (SCH Number 2006011029). As approved, the Specific Plan allows for the development of 169.5 acres of residential uses (1,860 units), 88.5 acres of business uses (1,306,582 square feet), 39 acres of roads and drainage/detentions areas, and 44 acres of open space amenities, including a lake, parks, recreation center, and paseos. Since then, a 7.26-acre portion of the Specific Plan within the southern portion of the Specific Plan area was removed in order to construct a commercial center and the remainder of the Specific Plan area has remained undeveloped.

The City of Perris City Council approved the first amendment to the Harvest Landing Specific Plan on September 25, 2012. Specific Plan Amendment No. 1 modified Table 12.0-1, *Land Use Restrictions*, to clarify allowable industrial land uses particularly related to storage in Airport Potential Zone 1 (APZ-1).

The second Specific Plan Amendment was approved by the City Council on November 27, 2012. Specific Plan Amendment No. 2 updated all graphics to reflect the street vacation of Nance Street and Markham Street between Redlands Avenue and the Perris Valley Storm Channel. This amendment also reflects the street vacation and General Plan Amendment (GPA 12-02-0001) to the City of Perris General Plan Circulation Element for the removal of Harley Knox Boulevard from Redland Avenue to the Perris Valley Storm Channel.

Environmental Setting

The Project site includes two existing single-family residences, remnants of previously demolished residential structures, disturbed vacant land with evidence of prior agricultural use, and adjacent developed roadways. The Specific Plan Overlay Area also includes Val Verde Elementary School. According to the City of Perris General Plan, the site is designated for Harvest Landing Specific Plan, Business Park (BP), and Public (P) land uses. Zoning within the Harvest Landing Specific Plan includes a range of designations such as residential (Low to High Density), Commercial Community, Park, Detention Basin, and Multiple Business Use. The parcels proposed for annexation are currently zoned Light Agricultural (A1) and Public (P). Additional details regarding the Project site and environmental context are provided in Draft EIR Section 4.0, *Environmental Setting*.

Project Description

The Project involves the amendment of the previously adopted Harvest Landing Specific Plan (Specific Plan) to reconfigure the land use plan, expand the Specific Plan area, and facilitate the phased development of business park and commercial uses within the City of Perris. The Project includes both programmatic-level and project-level components, as analyzed in the Draft Environmental Impact Report (Draft EIR) prepared for the Project.

As proposed, the Project includes the following primary components:

- Amendment of the existing Harvest Landing Specific Plan (Specific Plan Amendment No. 3), including an annexation of 5.54 acres, detaching 7.26 acres, and re-designation of Specific Plan land uses;
- Project-level development of approximately 186.38 acres in Phase 1, including a business park, community shopping center, big box commercial retail center, a water quality basin, and roadway improvements;
- Programmatic-level planning for future development of approximately 122.68 acres in Phase 2 for Multiple Business Use (MBU) development;
- Construction of supporting infrastructure including roadways, stormwater drainage, sewer, and water facilities.

Specific Plan Amendment. The Specific Plan Amendment would annex three parcels (totaling 5.54 acres) to the Specific Plan area and designate them as MBU (APNs 305-060-042, 305-060-036, and 305-060-037) and add an MBU overlay to APN 305-060-038 (10.66 acres), and formally detach APN 305-240-027 (7.26 acres) at the southern portion of the existing Specific Plan area, resulting in a total Specific Plan area of 358.28 acres, as shown on Figure 3-5, *Annex Areas,* of the Draft EIR. In addition, the Specific Plan Amendment is proposed to change the existing land use plan to replace residential uses with Multiple Business and Commercial uses, as shown in Table 3-2 and Figure 3-6, *Proposed Harvest Landing Specific Plan Land Use Plan*, of the Draft EIR.

The Specific Plan Amendment allows for a maximum development capacity of approximately 8,604,821 square feet of Multiple Business Use (MBU) and 1,526,342 square feet of Commercial uses. However, based on proposed development applications and submitted plans, the maximum feasible buildout analyzed in the Draft EIR is approximately 5,735,535 square feet of MBU and 428,507 square feet of Commercial uses (refer to Table 3-3, *Proposed Specific Plan Amendment Program Summary*, in the Draft EIR). The proposed Specific Plan Amendment would also result in a reduction in buildout of approximately 1,860 residential units and an increase of approximately 7,371,420 square feet of MBU uses and approximately 1,453,161 square feet of Commercial uses compared to buildout of the existing Specific Plan.[1]

Phase 1 Development (Opening Year 2026). The Phase 1 development component of the Project is analyzed at a project level in the Draft EIR and includes development of approximately 186.38 acres within the southern and central portions of the Specific Plan area. Phase 1 development proposes buildout of 139.89-acre business park, 22.16-acre community shopping center, 24.33-acre commercial big box retail store, a 12.91-acre water quality basin, and 36.5 acres of roadway improvements, as shown on Figure 3-7, *Conceptual Site Plan,* within the Draft EIR.

[1] To note, the proposed Specific Plan Amendment allows residential development as a permitted use pursuant to the previous Harvest Landing Specific Plan residential land use designations and densities; however, no residential development is proposed by the Project.

Business Park (MBU) Site

A 139.89-acre portion of Phase 1 is proposed for development as a business park. The two existing residential structures would be demolished and a parcel hub facility and other as-yet determined Business Park uses permitted under the MBU designation would be constructed in the northern portion of the Phase 1 area, north of Barrett Avenue and west of Orange Avenue. [2] Site improvements would include facility and employee parking, electric vehicle charging stations, drought-tolerant landscaping, and on-site stormwater infrastructure.

Community Shopping Center Site

The community shopping center component would occupy 22.16 acres and include a retail center totaling approximately 250,457 square feet of commercial floor area. The proposed shopping center buildings would have a maximum height of 50.5 feet. The site plan includes a major sporting goods anchor tenant and multiple pads for restaurants, service retail, and a medical/dental office. Landscape design includes drought-tolerant plantings, shaded plazas, and pedestrian amenities. The community shopping center component would also include a total of 106,896 square feet of landscaping and would include two driveways along Harvest Landing Way, two driveways along Perris Boulevard, and two driveways along Orange Avenue. Table 3-5 of the Draft EIR, *Community Shopping Center Site Development Summary,* provides a detailed breakdown of the proposed buildings, commercial use type, and total building square footage.

Commercial Big Box Retail

The commercial big box retail area covers 24.33 acres and would include a 167,050 square feet discount retail store, a 12-pump gas station, and two fast-food restaurants located along Perris Boulevard. The proposed big box retail building would have a maximum height of 30 feet and the proposed gas station canopy would be a maximum height of 18 feet with a 14-foot vehicle clearance. The commercial big box retail component would also include a total of 144,511 square feet of landscaping and would include a total of five driveways, inclusive of two driveways along Barrett Avenue, two driveways along Harvest Landing Way, and one driveway along Perris Boulevard. A total of 849 parking stalls would be provided for the Commercial Big Box Retail site.

Utilities and Street Improvements

Phase 1 development also includes a 12.91-acre water quality management basin designed with bioretention and detention infrastructure, walking trails, and fitness equipment for employee use. Approximately 36.5 acres of land within Phase 1 is dedicated to roadway improvements, including improvements to Indian Avenue, Orange Avenue, Frontage Road, Perris Boulevard, Barnett Avenue, Harvest Landing Way, and Private Drive A. Site development would also include installation of storm drain, sewer, and water improvements, as detailed in Figures 3-25 through 3-28 of the Draft EIR.

Phase 2 Development (Future Buildout). Within the Phase 2 Planning Area, as shown on Figure 3-7 of the Draft EIR, *Conceptual Site Plan*, the Project would include future MBU development. This area encompasses the 111.83-acre Phase 2 MBU area and the 10.66-acre MBU Overlay area. Buildout of the future development area would occur pursuant to purchase of land by future project applicants. For purposes of

[2] In response to the City of Perris City Council adopting Urgency Ordinance 1466 establishing a 45-day moratorium on approval, establishment and expansion of industrial warehousing and distribution uses, Buildings 2 through 7 were withdrawn from consideration for approval. Nevertheless, the EIR analyzes potential impacts resulting from construction and operation of Buildings 2 through 7.

the Draft EIR analysis, development of this area is anticipated to begin in 2026 and to be completed by 2030. The proposed amended Specific Plan buildout of the Phase 2 development area without inclusion of the overlay area would allow up to 3,659,693 square feet of permitted uses under the MBU designation, at a maximum FAR of 0.75. Development of the overlay area would include approximately 348,262 square feet of permitted uses under the MBU designation. Access to future developments within the Phase 2 development area would be provided along Frontage Road, Orange Avenue, and Indian Avenue, with truck access limited to Orange Avenue and Frontage Road. Future entitlements will be needed to develop the Phase 2 development area and site plans are not proposed at this time. However, to provide a conservative estimate of environmental impacts, the maximum allowed development density for the Phase 2 buildout of 4,007,955 square feet is analyzed in the Draft EIR.

Discretionary Actions

Implementation of the Project would require, but is not limited to, the following discretionary approvals by the City (Lead Agency):

- Specific Plan Amendment No. 22-05250 to revise land use designations, establish a plan for public facilities, design guidelines, and to annex properties to the north of the Project into the Specific Plan.
- General Plan Amendment No. 24-05175 to redesignate annexed parcels as Harvest Landing Specific Plan (HL SP).
- Zone Change No. 24-05176 to rezone the properties being annexed into the Specific Plan and overlay from various zonings to MBU under the Harvest Landing Specific Plan.
- Development Plan Review (DPR) Nos. 22-00023, 22-00024, 22-00025, 22-05235, 22-05238, 23-00017, 24-00008, and 24-0009 to review the site plans and building elevations for the proposed industrial and commercial buildings.
- Tentative Tract Map No. 22-05250 (TTM 38810 and 38811) to revise site boundaries within the Harvest Landing Specific Plan.
- Conditional Use Permit (CUP) Nos. 22-05239, 22-05238, and 22-05005 for proposed warehouse buildings.
- Development Agreement Amendment(s) to update to the Harvest Landing Development Agreement per the revised Project.
- Approve a Determination of Biologically Equivalent or Superior Preservation.
- Approvals and permits necessary to execute the Project, including but not limited to, grading permit, building permit, etc.

Statement of Project Objectives

The following objectives have been crafted to aid decision makers in their review of the Project and its associated environmental impacts pursuant to Section 15124(b) of the CEQA Guidelines. The Project objectives are designed to include the underlying purpose of the Project. The Project objectives have been refined throughout the planning and design process for the Project, and are listed below:

- Amend the Harvest Landing Specific Plan to provide a comprehensive master plan for the Specific Plan area to provide a mix of commercial and business park uses with supporting infrastructure facilities.
- Provide economic opportunities and job growth within the City of Perris by enhancing the community's available range of employment generating uses.
- Provide additional retail and dining opportunities for residents and visitors within the City of Perris.
- Develop an underutilized property located in vicinity to the I-215 and has access to available infrastructure, including roads and utilities to accommodate the growing need for goods movement within Southern California.
- Allow for the accommodation of a variety of potential Business Park uses that are designed to attract a range of users and are economically competitive with other Business Park developments in the region

- Identify and provide for the installation and ongoing maintenance of water, sewer, drainage, and road facility infrastructure to adequately serve the Specific Plan area.
- Provide guidelines and standards for building and site development aesthetics that provide a well-defined identity for the Specific Plan development.
- Provide guidelines for sustainable development design that reduces potable water use, energy use, and fossil fuel consumption.

SECTION III

ENVIRONMENTAL REVIEW AND PUBLIC PARTICIPATION

The Final EIR includes the Draft Environmental Impact Report (EIR) dated May 2024, written comments on the Draft EIR that were received during the public review period, written responses to those comments, changes to the Draft EIR, and the Mitigation Monitoring and Reporting Program (MMRP). In conformance with CEQA and the State CEQA Guidelines, the City of Perris conducted an extensive environmental review of the Harvest Landing Retail Center & Business Park Project that includes the following:

- Completion of a Notice of Preparation (NOP) released for a 30-day public review period. The NOP was released on August 9, 2024. The NOP was posted on the City's website www.cityofperris.org on August 9, 2024. The NOP was posted to the State Clearinghouse's ceqanet.opr.ca.gov for public review from August 9, 2024, through September 9, 2024. Copies of the NOP were made available for public review and download via the City's website at: https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review
- Completion of a scoping process, in which agencies and the public were invited by the City of Perris to participate. The public scoping meeting for the EIR was held on August 21, 2024, at 6:00 p.m. at 101 North D Street, Perris, CA 92570. The notice of the public scoping meeting was included in the NOP distributed on August 9, 2024.
- Preparation of a Draft EIR by the City of Perris was originally made available for a 45-day public review period (May 30, 2025, through June 14, 2025). The Notice of Availability (NOA) for the Draft EIR was sent to all persons, agencies and organizations on the interested persons list, posted on the Project site, published on the City's website, and filed with the County Clerk.
- The NOA of the Draft EIR was posted to the State Clearinghouse's ceqanet.opr.ca.gov for public review from May 30, 2025, through June 14, 2025. The NOA was posted at the City of Perris, Development Service Department at 135 North D Street, Perris, CA 92570 throughout the public review period. Copies of the Draft EIR were made available for public review and download via the City's website at: https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review
- The Final EIR contains comments on the Draft EIR, responses to those comments, revisions to the Draft EIR if any, the Mitigation Monitoring and Reporting Program, and appended documents. The Final EIR was released more than 10 days prior to certification of the Final EIR.
- After considering the EIR and in conjunction with making these findings, the City of Perris hereby finds that pursuant to Section 15092 of the CEQA Guidelines that approval of the Project will result in significant effects on the environment, however, the significant effects will be eliminated or substantially lessened where feasible and has determined that remaining significant effects are found to be acceptable under Section 15093.
- The Mitigation Monitoring and Reporting Program is hereby adopted to ensure implementation of feasible mitigation measures identified in the EIR. The City of Perris finds that these mitigation measures are fully enforceable and shall be binding upon the City and affected parties.
- The City of Perris hereby certifies the Final EIR in accordance with the requirements of CEQA.
- Pursuant to CEQA Guidelines Section 15095, staff is directed as follows: (a) copy of the Final EIR and CEQA Findings of Fact shall be retained in the Project files; (b) copy of the Final EIR and CEQA Findings of Fact shall be provided to all CEQA "responsible" agencies.

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SECTION IV

ENVIRONMENTAL IMPACTS NOT REQUIRING MITIGATION

Based upon the EIR prepared for the Project, the City determined that the Project would have no impact or a less-than-significant impact on the following environmental topic areas:

- Aesthetics
  - Scenic vistas
  - Scenic resources
  - Visual character
- Agriculture and Forestry Resources
- Air Quality
  - Odors
- Biological Resources
  - Wetlands
  - Local policies or ordinances
- Cultural Resources
  - Historical resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
  - Vibration noise levels
  - Airport noise levels
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems
- Wildfire

Section 15091 of the State CEQA Guidelines does not require specific findings to address environmental effects that an EIR identifies as "less than significant" where no mitigation is required. These findings will nevertheless fully account for all such effects identified in the Draft EIR in this Section IV. Thus, the City hereby finds that the following potential environmental impacts of the Project are less than significant and do not require the imposition of mitigation measures:

A. Aesthetics

Impact AES-1 Finding: The Project would not have a substantial adverse effect on a scenic vista (Draft EIR at p. 5.1-6). Impacts would be less than significant.

Facts in Support of Finding: The Specific Plan area is largely undeveloped and is located in a built-out portion of the City of Perris, where long-range views of the surrounding foothills are largely obstructed or fragmented by existing development, vegetation, and utility infrastructure. Phase 1 development would include industrial and commercial buildings that are set back from adjacent public roadways and would not encroach on the limited existing public views. Future Phase 2 development would be subject to Perris Municipal Code Chapter 19.70 and the Harvest Landing Specific Plan, which require landscaped setbacks and design standards that minimize visual impacts from public vantage points. As such, the Project would not obstruct scenic vistas or damage scenic resources, and impacts would be less than significant.

Impact AES-2 Finding: The Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway (Draft EIR at p. 5.1-6). No impact would occur.

Facts in Support of Finding: There are no officially designated State scenic highways in the vicinity of the Specific Plan area, and the site is not visible from the nearest eligible segment of SR-74 or the I-215/SR-74 interchange located over one mile to the south. Therefore, the Project would have no impact on scenic resources within a State scenic highway corridor.

Impact AES-3 Finding: The Project would not conflict with applicable zoning and other regulations governing scenic quality. (Draft EIR at p. 5.1-7). Impacts would be less than significant.

Facts in Support of Finding: The Specific Plan area is located within an urbanized portion of the City of Perris, as defined by Public Resources Code Section 21071(a)), and is surrounded by existing industrial, commercial, and residential development. The Project includes design standards and guidelines within the Harvest Landing Specific Plan Amendment that regulate architecture, landscaping, setbacks, outdoor storage, and lighting to ensure compatibility with surrounding development and maintain visual character.

Phase 1 Development

As detailed in Section 3.0 of the Draft EIR, *Project Description*, the seven Phase 1 Business Park buildings would have a floor area ratio ranging from 0.12 to 0.45 FAR and would be well within the allowable on-site density. The Specific Plan Amendment also contains Design Standards and Design Guidelines for architecture, landscaping, outdoor furnishings, walls and fencing, lighting, color palette, access/parking, public art, and outdoor storage that are intended to regulate the scenic quality of the area, consistent with the City's General Plan. As shown in Table 5.1-1 of the Draft EIR, *Phase 1 Consistency with the Harvest Landing Specific Plan Amendment Development Standards,* Phase 1 would be consistent with the Specific Plan development standards that are applicable to the proposed Project.

Moreover, the City of Perris Planning Department has reviewed the proposed Phase 1 developments and has determined the Project would not conflict with the Perris Municipal Code or General Plan design regulations involving building architecture, landscaping, infrastructure, and road system design standards. As discussed in Table 5.1-2 of the Draft EIR, *Consistency with City of Perris General Plan Policies Related to Aesthetics*, the Project would be consistent with the goals and policies related to scenic quality set forth by the City of Perris General Plan. As such, the Project would be consistent with the Harvest Landing Specific Plan and City regulations regarding aesthetics and scenic quality, which would be verified by the City during the development permitting process. Therefore, while the proposed Project would change the visual character of the site, it would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, potential impacts would be less than significant.

Phase 2 Development

As discussed above, the City of Perris has reviewed the Project and determined that the proposed development is consistent with applicable General Plan goals, zoning regulations, and the Perris Municipal Code related to scenic quality. Future development within the Phase 2 area would also be subject to the Specific Plan development standards, General Plan policies, and Perris Good Neighbor Guidelines. Therefore, impacts would be less than significant.

Aesthetics Cumulative Finding: The Project would not have a cumulative adverse impact related to aesthetics. Impacts would be less than significant (Draft EIR at p. 5.1-17).

Facts in Support of Finding: The cumulative aesthetics study area includes public views toward the Specific Plan area as well as views from within the site toward the surrounding environment. Views of the surrounding foothills are partially obstructed by existing development and are not unique to the Specific Plan area. As shown in the Draft EIR, the proposed commercial and industrial buildings would be set back from adjacent roadways, including Perris Boulevard, Harvest Landing Way, Barrett Avenue, Frontage Road, and Orange Avenue, and would not obstruct existing long-range public views of the foothills from public roadways.

Nearby cumulative projects, including the Orbis Truck Yard, Target store, and other retail uses, are located within the same viewshed. These projects, like the proposed Project, are subject to applicable City of Perris zoning regulations and design guidelines. The proposed Project would comply with the Harvest Landing Specific Plan, including design provisions related to architecture, lighting, landscaping, and site layout, as

shown in Tables 5.1-1 through 5.1-3 of the Draft EIR. These standards would ensure visual compatibility and coordinated development within the cumulative context.

In addition, the Project and nearby developments would be required to comply with Perris Municipal Code Section 19.02.110, which governs outdoor lighting. As stated in the Draft EIR, lighting would be shielded and not include highly reflective materials, and landscaping would assist in screening light sources and reducing glare. Therefore, the Project would not result in cumulatively considerable impacts to scenic quality or from light and glare.

B. Agriculture and Forestry Resources

Impact AG-1 Finding: Implementation of the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agriculture use (Draft EIR at p. 5.2-19). No impact would occur.

Facts in Support of Finding: According to the California Department of Conservation's Farmland Mapping and Monitoring Program, the Specific Plan area includes approximately 301.19 acres designated as Farmland of Local Importance, 10.66 acres designated as Urban-Built Up Land, and 46.43 acres designated as Other Lands. No portion of the site is designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In accordance with CEQA Guidelines Section 21060.1, Farmland of Local Importance is not considered Farmland for CEQA purposes. The site is partially developed and does not contain existing farmland. Therefore, implementation of the Project would not result in the conversion of Farmland as defined under CEQA, and no impact would occur.

Impact AG-2 Finding: The Project would not conflict with existing zoning for agriculture use, or a Williamson Act contract (Draft EIR at p. 5.2-10). No impact would occur.

Fact in Support of Finding: The Specific Plan area is not under an active Williamson Act contract and would not result in the cancellation of such a contract. Approximately 6.9 acres proposed for annexation into the Specific Plan are zoned Light Agriculture (A1), with the remainder of the area zoned Public or subject to existing Harvest Landing Specific Plan designations (Municipal Code Section 19.20.010). The A1-zoned parcels are designated for BP uses under the City's General Plan and are not currently used for agricultural operations. No recent agricultural activity has occurred on the site. The proposed zone change would align zoning with the General Plan designations. Therefore, the Project would not result in impacts related to Williamson Act contracts or agricultural zoning, and no impact would occur.

Impact AG-3 Finding: The Project would not conflict with existing zoning, or cause rezoning of, forest land (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)) (Draft EIR at p. 5.2-11). No impact would occur.

Facts in Support of Finding: The Specific Plan area is located in an urbanized area of the City of Perris and is not designated or zoned as forest land, timberland, or Timberland Production as defined by Public Resources Code Section 12220(g), Public Resources Code Section 4526, or Government Code Section 51104(g). There are no forest resources on or near the site. Therefore, the Project would not conflict with zoning for or result in the rezoning of forest land or timberland, and no impact would occur.

Impact AG-4 Finding: The Project would not result in the loss of forest land or conversion of forest land to non-forest use (Draft EIR on p. 5.2-11). No impact would occur.

Facts in Support of Finding: The Specific Plan area is located in an urbanized area of the City. There is no forest land in the vicinity of the City of Perris. Therefore, development of the proposed Project would not cause loss of forest land or convert forest land to non-forest use. No impacts would occur to forest land or timberlands.

Impact AG-5 Finding: The Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agriculture use or conversion of forest land to non-forest use (Draft EIR on p. 5.2-11). No impact would occur.

Facts in Support of Finding: Buildout of the proposed Project would not result in the conversion of Farmland to non-agricultural use. Although a portion of the site is zoned A1, these parcels are designated as BP in the City's General Plan and have not been recently used for agricultural purposes. The site and surrounding area do not contain State-designated Farmland, and surrounding lands are designated as Urban-Built Up Land or Farmland of Local Importance under the Farmland Mapping and Monitoring Program. Additionally, the Specific Plan area does not contain forest land or timberland and is not designated or zoned for such uses. Therefore, the Project would not result in the conversion of Farmland or forest land to non-agricultural or non-forest uses, and no impact would occur.

Agriculture and Forestry Resources Cumulative Finding: The Project would not result in cumulative impacts to agriculture and forest resources (Draft EIR page 5.2-11).

Facts in Support of Findings:

Agricultural Resources

The cumulative study area for agricultural resources is the County of Riverside, which is regularly evaluated through the State's Farmland Mapping and Monitoring Program. While agricultural conversion is occurring elsewhere in the County due to ongoing development, the Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. There are no existing agricultural operations on-site or in the immediate vicinity, and the Project would not result in the conversion of Farmland. Therefore, the Project would not contribute to the cumulative loss of agricultural resources.

Forest Resources

The cumulative study area for forest resources is the County of Riverside. There are no forest lands, timberlands, or lands zoned for forest production on or near the Project site. As the Project would not result in the loss or conversion of forest land, it would not contribute to cumulative impacts on forest resources.

C. Air Quality

Impact AQ-4 Finding: The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people (Draft EIR at p. 5.3-68). Impacts would be less than significant.

Facts in Support of Finding: Odors generated by the operation of warehousing uses are not expected to be significant or highly objectionable and would be required to be in compliance with South Coast Air Quality Management District (South Coast AQMD) Rule 402, which would prevent nuisances to sensitive land uses. During construction, emissions from construction equipment, such as diesel exhaust, and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be temporary and are not expected to affect a substantial number of people. During operations of the warehouse, all Project-generated solid waste would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations and would not generate objectionable odors. Therefore, impacts relating to both operational and construction activity odors would be less than significant.

D. Biological Resources

Impact BIO-3 Finding: The Project would not 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. (Draft EIR at p. 5.4-32). No impact would occur.

Facts in Support of Finding: No inundated areas, wetland features, or wetland plant species that would be considered wetlands as defined by Section 404 of the Clean Water Act occur within the Specific Plan area (Draft EIR Appendix D). Therefore, implementation of the proposed Project would not result in any impacts or have substantial adverse effects on federally protected wetlands.

Impact BIO-5 Finding: The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (Draft EIR at p. 5.4-33). No impact would occur.

Facts in Support of Finding: The Project would not conflict with any local policies or ordinances protecting biological resources. Perris Municipal Code Chapter 19.71, Urban Forestry Establishment and Care, regulates the removal or severe trimming of any trees within a public right of way, city street, or city property. As determined by the Habitat Assessment and MSHCP Consistency Analysis, the Project would not impact any trees within a public right of way or any city trees (Draft EIR Appendix D). Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, and no impacts would occur.

E. Cultural Resources

Impact CUL-1 Finding: The Project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5 (Draft EIR at p. 5.5-7). Impacts would be less than significant.

Facts in Support of Finding: The Specific Plan area includes two single family residences, remnants of two previously demolished residential structures, and Val Verde Elementary School, which are over 50 years in age and considered historic-era structures. At the time of the historic field survey, three single-family residences, remnants of one previously demolished residential structure, and Val Verde Elementary School existed on-site. Therefore, all three single-family residences have been evaluated within the Historical Resources Analysis Report (Draft EIR Appendix I). The evaluation of the structures was prepared to identify whether the buildings meet the definition of a historical resource under the California Register and pursuant to Section 15064.5 of the CEQA Guidelines.

Val Verde Elementary School – 2656 Indian Avenue

Originally constructed in 1959 as an open-air campus, Val Verde Elementary School currently consists of ten buildings, including four mid-century structures from the original buildout and six later additions constructed between 1985 and 2005. The original buildings have been substantially altered over time, including major additions and modifications to form, materials, and layout. The school is not strongly associated with important historic events (Criterion 1), persons (Criterion 2), or distinctive architectural characteristics (Criterion 3), and has no potential to yield important information in history (Criterion 4). The site is not considered eligible for listing in the California Register and does not qualify as a historical resource pursuant to CEQA Guidelines (Draft EIR Appendix I).

2411 Indian Avenue

This property contains a one-story Ranch-style residence constructed in 1967 and a detached garage added later. The residence has undergone substantial modifications, including additions, installation of a rear carport, a block wall, vinyl replacement windows, and other non-original features. Though associated with August and Edith DiPietro, long-time Perris residents, the property is not strongly tied to significant historical figures or events, and neither the individuals nor the home's architecture are considered locally or regionally significant under Criteria 1 through 3. It does not appear to yield important historical information (Criterion 4) and is therefore not a historical resource pursuant to CEQA Guidelines (Draft EIR Appendix I).

2364 Indian Avenue

This site previously contained a one-story Ranch-style home constructed in 1966. The home was associated with the Coudures family, notable agricultural pioneers in the Perris Valley. However, the residence has been fully demolished, with only partial foundations, concrete pads, and a chimney remaining. Due to its lack of physical integrity and absence of any remaining structure, the property is not eligible for listing under any California Register criterion and does not meet the definition of a historical resource.

2334 Indian Avenue

Constructed in 1966, this former single-family Ranch-style residence was originally owned by Frank and Marcelle Marie Arrateig. The home underwent several alterations, including reroofing and the addition of ancillary structures, and was ultimately demolished. Due to the absence of the original structure and limited historical significance of associated persons, the property does not meet eligibility under Criteria 1 through 4 and does not qualify as a historical resource pursuant to CEQA Guidelines (Draft EIR Appendix I).

2304 Indian Avenue

This site includes a one-story Ranch-style home built in 1969 and associated garage. It was occupied by the Reed family, including Grayson "Red" Reed, a truck driver and local equestrian enthusiast. While he contributed to the establishment of the Lake Perris Equestrian Center, the residence itself lacks architectural distinction and is not considered strongly associated with significant persons or events. The property is not eligible under Criteria 1 through 4 and is not considered a historical resource pursuant to CEQA Guidelines (Draft EIR Appendix I).

None of the on-site properties meet the criteria for listing in the California Register of Historical Resources or otherwise qualify as historical resources pursuant to CEQA Guidelines. Therefore, the Project would not result in a substantial adverse change to a historical resource, and impacts would be less than significant.

F. Energy

Impact E-1 Finding: The Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation (Draft EIR at p. 5.6-8). Impacts would be less than significant.

Facts in Support of Finding:

Construction

Construction of the Project would result in the consumption of diesel fuel, gasoline, and electricity. As shown in the Draft EIR (Table 5.6-4), construction of Phase 1 would require approximately 349,703 gallons of diesel fuel, and construction of Phase 2 would require approximately 449,621 gallons, for a total construction fuel demand of approximately 809,474 gallons of diesel fuel. Construction worker trips are estimated to consume approximately 718,678 gallons of gasoline, as shown in Tables 5.6-5 through 5.6-7 of the Draft EIR. Vendor and hauling trucks would consume an additional 980,574 gallons of fuel, as shown in Tables 5.6-8 through 5.6-10 of the Draft EIR. Electricity demand during construction is estimated at approximately 468,195 kilowatt-hours (kWh) for Phase 1 and 3,198,348 kWh for Phase 2, totaling 3,666,543 kWh for full buildout, as shown in Table 5.6-1 of the Draft EIR.

All construction activities would comply with California Air Resources Board regulations governing idling, emissions standards, and equipment retrofits. For example, CCR Title 13, Motor Vehicles, Section 2449(d)(3), *Idling*, limits idling times of construction vehicles to no more than 5 minutes. In addition, Mitigation Measures AQ-2 and AQ-5 would require the use of Tier 4 construction equipment and newer haul trucks. These measures, along with existing regulatory requirements, would ensure that energy use during construction

would not be inefficient or wasteful. Therefore, impacts related to construction energy consumption would be less than significant.

Operation

Operation of the Project would result in energy use from mobile sources, stationary equipment, and building operations. The Draft EIR evaluates operational energy demand using two truck trip scenarios (Scenario A and Scenario B) and two development configurations (With Overlay and Without Overlay).

Under Scenario A with the Overlay, annual fuel consumption is estimated at 3,508,599 gallons for Phase 1 and 3,405,287 gallons for Phase 2, totaling 6,604,763 gallons per year, as shown in Table 5.6-11 of the Draft EIR. Under Scenario A without the Overlay, Phase 2 would require 3,108,958 gallons annually, resulting in 6,308,434 gallons per year for the total Project, as shown in Table 5.6-12 of the Draft EIR. Under Scenario B with the Overlay, fuel use is estimated at 4,084,551 gallons for Phase 1 and 5,552,767 gallons for Phase 2, for a total of 9,275,507 gallons annually, as shown in Table 5.6-13 of the Draft EIR. Under Scenario B without the Overlay, Phase 2 would use 4,707,485 gallons annually, with a combined total of 8,792,036 gallons per year, as shown in Table 5.6-14 of the Draft EIR.

Stationary energy demands from diesel-powered fire pumps and emergency generators are estimated at 6,779 gallons of fuel annually for Phase 1 and up to 18,077 gallons for Phase 2, resulting in a total of 24,856 gallons per year under full buildout with the Overlay, as shown in Table 5.6-15 of the Draft EIR.

Operational electricity and natural gas demands are presented in Tables 5.6-17 and 5.6-18 of the Draft EIR. With the Overlay, annual electricity demand is estimated at 91,052,390 kWh and natural gas demand at 9,797,660 kBTU. Without the Overlay, electricity demand is estimated at 84,977,596 kWh with the same level of natural gas use. Following implementation of energy-reducing measures, electricity demand would decrease to 88,679,855 kWh with the Overlay and 82,608,111 kWh without the Overlay, as shown in Tables 5.6-19 and 5.6-20 of the Draft EIR.

The Project would comply with applicable energy efficiency regulations, including Title 24, CALGreen, and CARB emissions standards. Mitigation Measure GHG-4 requires LEED Silver certification, and Mitigation Measure GHG-5 requires rooftop solar infrastructure on each industrial building. The Project would also include electric vehicle infrastructure to further reduce mobile energy demand. Based on compliance with regulatory requirements and implementation of mitigation measures, operational energy use would not be considered inefficient, wasteful, or unnecessary. Therefore, operational energy impacts would be less than significant.

Impact E-2 Finding: The Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency (Draft EIR at p. 5.6-29); therefore, impacts would be less than significant.

Facts in Support of Finding: The Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed Project. The City's administration of the CCR Title 24 requirements includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met. In line with standard City conditions of approval and Mitigation Measure AQ-8 for air quality, Project plans and specifications shall require signs at loading dock facilities that identify the anti-idling regulations. Thus, the Project would not conflict with the idling limits imposed by CCR Title 13, Motor Vehicles, Section 2449(d)(3), Idling.

The Project would include solar infrastructure on each building to support on-site electricity use. Although the Project's future tenants are not currently known, and the use of solar panels is generally tailored to the electrical demands of the tenant, the building tenants would install solar panels pursuant to Mitigation Measure GHG-5, which requires solar panels to provide 100 percent of the power to the office area and utilize that on-site power for electric plus ins at loading docks and on-site motorized equipment. In addition, each industrial building would be designed to attain LEED Silver certification, at a minimum, as required by

Mitigation Measure GHG-4, which would ensure that new construction within the Project area would implement renewable energy and utilize energy efficiently. Therefore, 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.

Energy Cumulative Finding: The Project would not result in cumulative energy consumption which would be cumulatively wasteful, inefficient, or unnecessary (Draft EIR at p. 5.6-30).

Facts in Support of Finding: The geographic context for analysis of cumulative impacts regarding energy includes past, present, and future development within southern California because energy supplies (including electricity, natural gas, and petroleum) are generated and distributed throughout the southern California region. All development projects throughout the region would be required to comply with the energy efficiency standards in the Title 24 requirements. With implementation of the existing energy conservation regulations, cumulative electricity and natural gas consumption would not be cumulatively wasteful, inefficient, or unnecessary.

Petroleum consumption associated with the proposed Project would be primarily attributable to transportation, especially vehicular use. However, State fuel efficiency standards and alternative fuels policies (per AB 1007 Pavely) would contribute to a reduction in fuel use, and the federal Energy Independence and Security Act and the State Long Term Energy Efficiency Strategic Plan would reduce reliance on non-renewable energy resources.

The Project would not result in wasteful or inefficient use of energy, and mitigation measures that are included to reduce air quality and greenhouse gas emissions would support the reduction of energy consumption and promote efficient use of energy. For these reasons, the consumption of energy resources would not occur in a wasteful, inefficient, or unnecessary manner and would be less than cumulatively considerable.

G. Geology and Soils

Impact GEO-1i Finding: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most 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 (Draft EIR at p. 5.7-9). No impact would occur.

Facts in Support of Finding: The Specific Plan area is not within an Alquist Earthquake Fault Zone, and there are no known active faults within 500 feet. The nearest active fault zones are the San Jacinto Fault Zone, located approximately 9 miles northeast of the Project site and the Elsinore Fault Zone, located approximately thirteen miles southwest of the Project site. Since the site is not located within an Alquist-Priolo Earthquake Fault Zone, impacts related to the surface rupture of a known earthquake fault would not occur within the Specific Plan area.

Impact GEO-1ii Finding: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking (Draft EIR at p. 5.7-9). Impacts would be less than significant.

Facts in Support of Finding: The Project site is located within a seismically active region, with numerous faults capable of producing significant ground motions. Project development could subject people and structures to hazards from ground shaking. However, seismic shaking is a risk throughout Southern California, and the Specific Plan area is not at greater risks of seismic activity or impacts as compared to other areas within the region.

Project development, including structures proposed under both Phase 1 and Phase 2, would be required to comply with the most recent California Building Code standards for seismic safety, including Chapter 16, which outlines requirements for earthquake-resistant structural design based on soil conditions, building

configuration, and occupancy. The City of Perris has adopted the California Building Code by reference into its Municipal Code (Section 16.08.050), and compliance would be ensured through the City's standard plan check and building permitting process. Because all future development would be designed and constructed consistent with applicable seismic safety regulations, the Project would not expose people or structures to substantial risks related to ground shaking. Therefore, potential impacts related to strong seismic ground shaking would be less than significant.

Impact GEO-1iii Finding: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction (Draft EIR at p. 5.7-10). Impacts would be less than significant.

Facts in Support of Finding: The Specific Plan area is located within a zone of low liquefaction susceptibility. Additionally, the soil conditions on-site are not conducive to liquefaction, due to the presence of moderate to high strength soils and the lack of a shallow groundwater table. Free water was not encountered during soil borings, which were sampled to a maximum depth of 50 feet below existing site grades (Draft EIR Appendix K). Furthermore, the Project would be developed in compliance with construction requirements under the California Building Code, as adopted in the Perris Municipal Code under Section 16.08.050. Specific engineering design recommendations would be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that structures would withstand the effects of seismic ground movement, including liquefaction and settlement. Therefore, potential impacts related to hazards from seismic-related ground failure would be less than significant.

Impact GEO-1iv Finding: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides (Draft EIR at p. 5.7-10). Impacts would be less than significant.

Facts in Support of Finding: The Specific Plan area is located in a seismically active region subject to strong ground shaking. However, the Project site is located in a flat area that does not contain nor is adjacent to large slopes, and the Project would not create large slopes. In addition, the Project site is not located within a landslide hazard zone as shown in Figure S-7 of the City of Perris General Plan Safety Element. As a result, implementation of the Project would not expose people or structures to substantial adverse effects involving landslides, and potential impacts related to landslides would not occur.

Impact GEO-2 Finding: The Project would not result in soil erosion or the loss of topsoil (Draft EIR at p. 5.7-10). Impacts would be less than significant.

Facts in Support of Finding:

Construction

Construction of the Project has the potential to contribute to soil erosion and the loss of topsoil. Grading and excavation activities would be required that would expose and loosen topsoil, which could be eroded by wind or water. However, under Chapter 14.22 of the Perris Municipal Code, the Project would be required to comply with the NPDES Storm Water Permit (MS4 Permit) construction permit regulations, which require the preparation and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP). As a part of the SWPPP, erosion and sediment control BMPs would be used to reduce or eliminate pollutants entering the City's stormwater system. These BMPs may include the use of silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, hydroseeding. Implementation of construction BMPs in compliance with the City's permitting requirements would cover exposed soil or impede stormwater runoff, reducing the potential for erosion. Therefore, potential construction impacts related to erosion would be less than significant.

Operation

Once constructed, the developed areas within the Specific Plan would contain buildings, pavement and landscaping, minimizing the potential for soil erosion and loss of topsoil. Also, on-site drainage features would be installed as part of the proposed development, which would be designed to filter and slowly discharge stormwater into the off-site drainage system and further reduce the potential for stormwater to erode topsoil. Future developments within Phase 2 would require a site-specific Water Quality Management Plan (WQMP), which would ensure that the Regional Water Quality Control Board requirements, and appropriate operational BMPs would be implemented to minimize or eliminate the potential for soil erosion or loss of topsoil to occur. Therefore, potential impacts related to soil erosion would be less than significant.

Impact GEO-3 Finding: The Project would not 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 (Draft EIR at p. 5.7-11). Impacts would be less than significant.

Facts in Support of Finding:

Phase 1 Development

The Specific Plan area and the adjacent parcels are relatively flat and do not contain any hills or steep slopes. There is a 1.5 percent slope downward to the east throughout the site. In addition, remedial grading and site preparation would further level the Project grades. Therefore, impacts related to landslides resulting from the proposed Project would be less than significant.

According to the Geotechnical Investigation prepared for the Project site, an estimated shrinkage potential of 4 to 12 percent is expected during removal and recompaction of the artificial fill and near-surface native soils. A subsidence of 0.1 feet in the soils below the zone of removal is estimated to occur within the Specific Plan area (Draft EIR Appendix K). In addition, excavation and recompaction of compacted structural fill would be conducted in compliance with the California Building Code as required through the City's permitting process. The Specific Plan area is not located within a liquefaction hazard zone. In addition, the soil and groundwater conditions on-site are not conductive to liquefaction. Due to the low probability of liquefaction on-site, risks related to lateral spreading are also considered low (Draft EIR Appendix K).

Soils within the Specific Plan area were determined to be mildly corrosive to ductile iron pipe and corrosive to copper pipe. However, compliance with the California Building Code would require the use of coating or protection to such pipes in direct contact with the soil. Therefore, impacts related to corrosive soil-induced collapse would be less than significant.

Phase 2 Development

No areas of liquefaction or landslide susceptibility are present within or adjacent to the Phase 2 area of the Specific Plan, including the MBU Overlay. In addition, future development within Phase 2 would be required to prepare and implement site-specific geotechnical studies consistent with California Building Code standards and the Perris Municipal Code. Compliance with site-specific geotechnical recommendations and applicable construction standards would ensure that any geologic hazards are properly addressed. Accordingly, potential impacts related to liquefaction, lateral spreading, subsidence, collapse, or landslides during Phase 2 buildout would be less than significant.

Impact GEO-4 Finding: The Project would not 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 (Draft EIR at p. 5.7-12). Impacts would be less than significant.

Facts in Support of Finding:

Phase 1 Development

The Specific Plan area's near-surface soils consist of silty sands and sandy silts with occasional clay content as well as clayey sands and occasional sandy clays and silty clays that have a low to very low expansion potential (Draft EIR Appendix K). In addition, as described above, compliance with the California Building Code and the recommendations provided within the Geotechnical Investigation is a standard City practice. Therefore, compliance with the requirements of the California Building Code as part of the building plan check and development review process, would ensure that expansive soil related impacts would be less than significant.

Phase 2 Development

Applicants for future developments within the Phase 2 portion of the Specific Plan would be required to prepare site-specific geotechnical investigations. Future development within Phase 2 would comply with geotechnical recommendations set forth in site-specific geotechnical investigations and California Building Code guidelines to determine expansive soil potential and if warranted, soils would be mitigated to standards established by California Building Code regulations. Therefore, potential impacts related to unstable expansive soils within Phase 2 would be less than significant.

Impact GEO-5 Finding: The Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater (Draft EIR at p. 5.7-13). No impact would occur.

Facts in Support of Finding: The Project would connect to the existing sewer infrastructure and would not use septic tanks or alternative methods for disposal of wastewater into subsurface soils. Therefore, impacts related to septic tanks or alternative wastewater disposal methods would not occur.

H. <u>Hazards and Hazardous Materials</u>

Impact HAZ-1 Finding: The Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (Draft EIR at p. 5.9-14). Impacts would be less than significant.

Facts in Support of Finding:

Construction

Construction of the Project would involve the use of hazardous materials such as diesel fuel, gasoline, oil, hydraulic fluid, paints, adhesives, and solvents. These substances, if improperly handled or stored, could pose risks to construction workers, the environment, and the public. These risks are standard, however, on all construction sites, and the Project would not cause greater risks than would occur on other similar construction sites. In addition, compliance with applicable federal, State, and local regulations, including the Hazardous Waste Control Act, Hazardous Materials Transportation Act, and regulations enforced by the Department of Transportation, CalOSHA, CalEPA, the Department of Toxic Substances Control, and the Riverside County Department of Environmental Health, would reduce the risk of significant impacts. In addition, implementation of a SWPPP required under the National Pollution Discharge Elimination System (NPDES) General Construction Permit would incorporate best management practices such as secondary containment, spill control measures, and proper handling procedures. Mandatory compliance with applicable laws and regulations during construction activities would be ensured during Project permitting procedures to limit potentially significant hazards to construction workers, the public, and the environment, which would reduce potential impacts to a less-than-significant level.

Operation – Phase 1

Phase 1 of the Project would include commercial and industrial development that may involve the use, storage, and disposal of hazardous materials such as solvents, lubricants, cleaning agents, paints, petroleum products, wastewater, batteries, and scrap metal. These materials would be handled in accordance with applicable federal, State, and local regulations, including those enforced by the EPA, CalEPA, CalOSHA, DTSC, and the Riverside County Department of Environmental Health. Businesses that use hazardous materials in excess of regulatory thresholds would be required to obtain permits from the Certified Unified Program Agency (CUPA) and prepare Business Emergency/Contingency Plans. Businesses would also be required to provide worker training and maintain spill prevention and response supplies. Compliance with applicable laws and regulations would ensure that impacts would be less than significant.

Operation – Phase 2

Similar to Phase 1, hazardous materials associated with industrial or warehouse uses would be present in limited quantities and would include cleaning agents, lubricants, solvents, paints, petroleum products, wastewater, batteries, and scrap materials. Businesses would be required to comply with applicable hazardous materials regulations and obtain necessary CUPA permits when thresholds are exceeded. Standard emergency response protocols, staff training, and spill containment measures would be required. Compliance with existing regulations would ensure that hazardous materials use, storage, and disposal during Phase 2 operations would not result in significant impacts. Therefore, impacts would be less than significant.

Impact HAZ-2 Finding: The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment (Draft EIR at p. 5.9-16). Impacts would be less than significant.

Facts in Support of Finding:

Construction

The Specific Plan area was historically used for agricultural purposes, and while agricultural chemicals such as pesticides, herbicides, and fertilizers may have been used on-site, there is no evidence of storage or mismanagement of these materials. The agricultural history of the site is considered a de minimis condition that does not require further investigation. In addition, the historical recognized environmental condition located at 1936 Indian Street has been closed since 1993, and the associated hazardous materials do not pose a risk to the proposed Project.

Accidental Releases. Construction of the Project would involve the limited use and disposal of hazardous materials, such as fuel, lubricants, solvents, and other finishing substances. However, the quantity of these materials would be limited, and compliance with applicable regulations regarding hazardous materials storage and handling would be required. The Project would also implement construction best management practices, including through a SWPPP required by the City's conditions of approval. These measures would minimize the potential for hazardous materials release and ensure prompt containment and cleanup of any spills. Therefore, construction-related impacts would be less than significant.

Asbestos Containing Materials. Buildings within the Specific Plan area were constructed in the 1970s and may contain asbestos. Demolition of these structures could result in the release of asbestos-containing materials. However, compliance with California Code of Regulations Sections 1529 and 341.6 through 341.14, as implemented by South Coast AQMD Rule 1403, would be required. These regulations govern the proper removal, transport, and disposal of asbestos and require submission of a Hazardous Waste Manifest. Additionally, Section 19827.5 of the California Health and Safety Code requires local agencies to verify compliance with applicable federal asbestos regulations before issuing demolition permits. These

requirements would ensure that appropriate actions are taken to prevent exposure, and impacts would be less than significant.

Lead-Based Materials. Lead-based materials may also be present in the existing structures. Demolition activities would be subject to federal and State regulations, including Title 29, Section 1926.62 of the Code of Federal Regulations, and Title 8, Section 1532.1 of the California Code of Regulations, as implemented by CalOSHA. These regulations address the handling, removal, disposal, and worker protection related to lead-based materials. CalOSHA also requires development and implementation of a lead compliance plan for construction or demolition activities disturbing lead-based paint, as well as 24-hour notification if more than 100 square feet would be disturbed. These requirements would reduce the potential for impacts to a less-than-significant level.

Undocumented Hazardous Materials. Given the historical use of the Specific Plan area and surrounding area for activities such as vehicle service and dry cleaning, there is a potential for undocumented hazardous materials to be present on-site. If encountered, excavated soil and materials would be managed in accordance with existing federal and State regulations, including those under the Resource Conservation and Recovery Act, OSHA, and the Hazardous Materials Transportation Act. Regulations implemented by the California Integrated Waste Management Board and the Santa Ana Regional Water Board would also apply. Compliance with these laws would ensure safe handling and disposal of hazardous substances and would reduce the potential for impacts related to accidental release to a less-than-significant level.

Operation

During operation, future tenants within the Specific Plan area may use, store, and dispose of various hazardous materials. However, all such activities would be subject to applicable local, State, and federal regulations, including those enforced by the USEPA, Department of Transportation, CalEPA, CalOSHA, DTSC, and Riverside County Department of Environmental Health, which serves as the Certified Unified Program Agency. Future tenants would be required to prepare Business Emergency/Contingency Plans to support emergency response and spill coordination. Additionally, the Project would include a Water Quality Management Plan with best management practices to prevent or mitigate impacts from accidental releases. As a result, operational impacts related to hazardous materials would be less than significant.

Impact HAZ-4 Finding: The Project would not 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 create a significant hazard to the public or the environment. (Draft EIR at p. 5.9-20). Impacts would be less than significant.

Facts in Support of Finding:

The Phase I ESA (Appendix N of the Draft EIR) included searches of federal, State, and local databases to determine whether hazardous materials sites were within and/or surrounding the Project. The record searches determined that Evans Transportation, located at 1936 Indian Street, near the center of the Specific Plan area within Phase 1 was listed on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5. The site was listed for the unauthorized release from underground storage tanks in 1992. Approximately 100 tons of soil were subsequently excavated and removed from the former tank pit area to a landfill. Confirmation soil sampling showed remaining total petroleum hydrocarbons concentrations from 15 to 28 milligrams per kilogram (mg/kg), which is below current regulatory screening levels, and no detectable concentrations of fuel-related VOC. On June 17, 1993, the Riverside County Department of Environmental Health closed the case file related to the leaking underground storage tank. Thus, the hazardous site listing was determined to be a Historic Recognized Environmental Condition and does not pose a hazard to the public or the environment as described in the Phase I ESA, and potential impacts would be less than significant.

Impact HAZ-5 Finding: The Project would not result in a safety hazard or excessive noise for people residing or working in the Project area for a project located within an airport land use plan or, where such a plan has not been adopted, be within two miles of a public airport or public use airport (Draft EIR at p. 5.9-20). Impacts would be less than significant.

Facts in Support of Finding: The Specific Plan area is located approximately 2.3 miles northeast of Perris Valley Airport, is not located within the Airport Influence Area, and is outside of the airport's 55 dBA CNEL noise level contour. As such, the Project site is not within any delineated safety or noise hazard zones, and the Project would not result in a safety hazard or excessive noise related to Perris Valley Airport. The Specific Plan area is also located approximately 2.8 miles southeast of March ARB/IPA and is within Airport Compatibility Plan (ALUCP) Zone C2. Safety hazards within Zone C2 are primarily related to the proximity to the instrument arrival corridor. The risk level associated with Compatibility Zone C2 is considered moderate to low, and the noise impact is considered moderate. The Specific Plan area is not located within the 60 dBA CNEL noise level contour boundaries from March ARB/IPA.

Due to the nature of the required City approvals, the City of Perris is required, pursuant to Public Utilities Code Section 21676, to refer the proposed Project to the Riverside County ALUC for ALUC review. On May 8, 2025, the proposed Project was found to be consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan by RCALUC. The proposed Project would comply with this ALUC notification and all other applicable rules and regulations as they pertain to the March ARB/IPA ALUCP and airport safety.

Perris Municipal Code Section 19.51.060 lists the compatibility criteria for each zone. Industrial and Commercial land uses in the C2 Zone are prohibited from having a maximum average intensity of 200 people per acre. Based on the County of Riverside General Plan, which estimates that the MBU designation would employ approximately one worker for every 1,030 square feet of MBU building area and one worker for every 500 square feet of Commercial building area, the entire Specific Plan area would result in approximately 6,427 employees. The gross acreage of the site is 358.28 acres, which would equate to an average of 18 people per acre. The Project is not classified as a prohibited use, and it would not result in hazards related to excessive glare, light, steam, smoke, dust, or electronic interference. The proposed Project would not introduce a safety hazard associated with airport operations for people residing, working, and visiting the Specific Plan area. As such, impacts would be less than significant.

Impact HAZ-6 Finding: The Project would not impair implementation of an adopted emergency response plan or emergency evacuation plan (Draft EIR at p. 5.9-21). Impacts would be less than significant.

Facts in Support of Finding: The Project would operate a commercial retail center, big box retail store, and business park that would be permitted and approved in compliance with existing safety regulations, such as the California Building Code and California Fire Code to ensure that it would not conflict with implementation of the Multi-Jurisdictional Local Hazard Mitigation Plan and the Perris Local Hazard Mitigation Plan.

Construction

According to the City of Perris General Plan Safety Element, Indian Avenue and Perris Boulevard are designated as general evacuation routes. The proposed construction activities, including equipment and supply staging and storage, would occur within the Specific Plan area and would not restrict access of emergency vehicles to the Specific Plan area or adjacent areas. During construction of driveways, construction of roadways, and infrastructure improvements, the roadways would remain at least partially open or proper detours would be provided to ensure adequate emergency access to the Specific Plan area and vicinity. Construction activities within the Specific Plan area that may temporarily restrict vehicular traffic would be required to implement adequate measures to facilitate the safe passage of persons and vehicles during required temporary road restrictions. In accordance with Section 503 of the California Fire Code, prior to any activity that would encroach into a right-of-way, the area of encroachment must be safeguarded

through the installation of safety devices to ensure that construction activities would not physically interfere with emergency access or evacuation. Therefore, impacts would be less than significant.

Operation – Phase 1 Development

As described in more detail in Section 3.0 of the Draft EIR, *Project Description*, Phase 1 would include multiple access driveways for trucks and passenger vehicles across Frontage Road, Orange Avenue, Barrett Road, and Private Drive A. Each building within the Phase 1 area would provide separate driveways for passenger and truck access, with truck driveways along Frontage Road limited to right-turn exits. The Community Shopping Center would have six driveways total, with truck access limited to specific western entries. The development would comply with Perris Municipal Code standards, which require design and construction specifications to allow adequate emergency access to the site and ensure that roadway improvements would meet public safety requirements. Therefore, Phase 1 would not interfere with emergency response or evacuation plans, and impacts would be less than significant.

Operation – Phase 2 Development

Physical development pursuant to Phase 2 of the proposed Project is not expected to create obstacles to the implementation of emergency response or evacuation plans adopted for the City. In addition, all roadway improvements would be made as a part of Phase 1 development. Emergency access and circulation during construction and operation of individual development projects under the proposed Project would be part of each future development project's review and approval by the City. Therefore, as existing City development standards would require new development within the proposed Project to be designed so as to not interfere with an adopted emergency response plan or emergency evacuation plan, impacts from implementation of the proposed Project would be less than significant.

Impact HAZ-7 Finding: The Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires (Initial Study at p. 5.9-22). Impacts would be less than significant.

Facts in Support of Finding: According to the CalFire Fire Hazard Severity Zone Map for the City of Perris and the Fire Hazards Map in the City's Safety Element, the Specific Plan area is not within a Very High Fire Hazard Severity Zone. Areas west of the Specific Plan area, across I-215, are located within a State Responsibility Area and Very High Fire Hazard Severity Zone. The Project would be required to comply with applicable State and local standards, including the City's Land Development and Engineering Standards and the California Fire Code. Project implementation would also be reviewed for fire safety during the plan check process by the City's Building and Safety Division and would be subject to Riverside County Fire Department fire prevention guidelines. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death from wildfires, and impacts would be less than significant.

Hazards and Hazardous Materials Cumulative Finding: The Project would not result in cumulative impacts related to hazards or hazardous materials (Draft EIR at p. 5.9-23).

Facts in Support of Finding:

Hazards and Hazardous Materials

The cumulative hazards materials impact assessment considers the development of the Project in conjunction with other development projects, as listed in Section 5.0 of the Draft EIR. Development of the Project in conjunction with other related projects in the City could result in the potential exposure of residents, employees, and visitors to hazardous materials, including those that may be present on redevelopment sites. However, all users, transporters, generators, and disposers of hazardous materials would be required to comply with applicable federal, State, and local regulations governing the safe transport, handling, use, storage, and disposal of hazardous substances. If hazardous materials are encountered, appropriate

remediation would be required pursuant to applicable regulations. Compliance with the regulatory requirements identified in Section 5.9.2 of the Draft EIR during construction and operation of the Specific Plan area and other cumulative projects would reduce potential impacts. Therefore, cumulative impacts related to hazardous materials would be less than significant.

Airport Hazards

The cumulative airport hazards impact assessment considers the development of the Project in conjunction with other development projects, as listed in Section 5.0 of the Draft EIR, in the context of the March ARB/IPA ALUCP area. Compliance with the Basic Compatibility Criteria table from the March ARB/IPA ALUCP and the MAOZ, as outlined in the Perris Municipal Code Chapter 19.51.060, would ensure that the Project and future development within the vicinity would not represent a hazard to people as a result of airport operations. As previously described, the Project does not propose the development of highly noise-sensitive outdoor nonresidential uses or hazards to flight, such as tall objects, visual or electronic forms of interference, or development that may attract birds. In addition, land uses and developments that would result in potential hazards to flight operations (listed in Section 19.51.060 of the Perris Municipal Code) would be prohibited. Therefore, the Project would not result in cumulatively considerable impacts related to March ARB/IPA hazards, and cumulative impacts would be less than significant.

I. Hydrology and Water Quality

Impact HYD-1 Finding: The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality (Draft EIR at p. 5.10-12). Impacts would be less than significant.

Facts in Support of Finding:

Construction

The Project is required to implement BMPs through a SWPPP, as mandated by the City of Perris and the MS4 permit. Implementation of BMPs would include erosion and sediment control, containment of waste and hazardous materials, and site housekeeping measures. As part of the City's permitting process, a qualified SWPPP developer would prepare erosion control plans with site-specific control methods, including storm drain inlet protection, gravel bags, soil binders, hydroseeding, and stabilized construction entry/exit points. Compliance with the SWPPP and City permitting requirements would ensure that water quality standards and waste discharge requirements are not violated during construction. Pursuant to Perris Municipal Code Chapter 14.22, plans for grading, drainage, erosion control, and water quality would be reviewed and approved by the City's Public Works Department prior to issuance of grading permits. Therefore, impacts related to construction-phase degradation of water quality would be less than significant.

Operation – Phase 1 Development

Operation of Phase 1, including the Business Park Site, Community Shopping Center, and Big Box Retail, would result in increased impervious surfaces and vehicle activity that would generate runoff containing pollutants such as trash, oil and grease, nutrients, and metals. These pollutants could be transported into receiving waters, including Canyon Lake and Lake Elsinore, further impacting water quality. To address these potential impacts, the Project is required to implement a WQMP pursuant to the NPDES Permit (Order No. R8-2002-0011, NPDES No. CAS618033). The Preliminary WQMP (Appendix O of the Draft EIR) includes long-term structural BMPs, such as bioretention basins, underground stormwater chamber systems, and modular wetland systems, which would treat and retain stormwater on-site before discharge.

As described in Table 5.10-2 of the Draft EIR, Phase 1 includes a regional WQMP basin and multiple underground stormwater systems for the Business Park buildings, Big Box Retail, and Community Shopping Center. Flows would be treated prior to discharge, with excess flows routed to proposed storm drain

infrastructure, including new reinforced concrete box and underground storm drain lines connecting to the Perris Valley Master Drainage Plan Line K. Off-site flood control improvements would include approximately 1,400 linear feet of upgrades, as shown in Figure 3-26 of the Draft EIR. Compliance to the existing regulations as implemented by the Perris Municipal Code would ensure that impacts related to degradation of water quality from operational activities of Phase 1 would be less than significant.

Operations – Phase 2 Buildout

Future development within Phase 2 of the Specific Plan area would also be required to comply with the City's NPDES Permit and implement a WQMP to address post-construction stormwater quality. The WQMP would incorporate low-impact development BMPs, such as infiltration and retention practices, and would be reviewed by the City's Public Works Department as part of the grading and development permitting process. All development within Phase 2 would follow the permitting procedures of the Perris Municipal Code unless otherwise specified in the Specific Plan. Therefore, adherence to existing regulations and implementation of project-specific BMPs verified through the City's permitting process would ensure that operational impacts related to degradation of water quality from Phase 2 buildout would be less than significant.

Impact HYD-2 Finding: The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin (Draft EIR at p. 5.10-16). Impacts would be less than significant.

Facts in Support of Finding: The Eastern Municipal Water District (EMWD) would provide water services to the Project. The Project area overlies the Perris North Groundwater management zone, which is located within the West San Jacinto Basin, and is managed through the West San Jacinto Groundwater Management Plan. The plan manages groundwater extraction, supply, and quality. Further, the West San Jacinto Groundwater Management Plan limits the allowable withdrawal of water from the basin by water purveyors. There are currently two active water wells located within the Specific Plan area. The on-site wells have historically been used for agricultural irrigation and one of the wells has historically and is currently utilized for one of the on-site residences. The Project would cap the abandoned and existing wells and drill a new well within the WQMP area. Water from the new well would be pumped and used for irrigation of proposed landscaping. Development of Phase 1 would include installation of approximately 1,520,404 square feet of drought tolerant landscaping. Based on the amount of landscaping, it is estimated that approximately 2.89-acre feet per year would be pumped from the proposed groundwater well, which is less than historic use of water from the groundwater from the site, which was estimated to be as high as 419 acre-feet per year in 2004. As such, Project operation would not result in a substantial depletion of groundwater supplies. As detailed in Section 5.18 of the Draft EIR, *Utilities and Service Systems*, the EMWD would be able to provide water services to the Project without affecting groundwater supplies.

The EMWD primarily uses imported water to recharge the groundwater basin. Although development of the Specific Plan would result in large areas of impervious surfaces, the site soils do not function to recharge the basin. The infiltration study conducted for the Project identified that the existing site has infiltration rates ranging from 0.1 to 1.7 inches/hour, which does not allow for substantial groundwater recharge; and thus, development of the site would not substantially impact groundwater recharge (Draft EIR Appendix P). Overall, the Project would not substantially decrease groundwater supplies or groundwater recharge, and potential impacts would be less than significant.

Impact HYD-3 Finding: The Project would not substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site (Draft EIR at p. 5.10-17). Impacts would be less than significant.

Facts in Support of Finding:

Construction

Construction of the Project within both phases of the Specific Plan would involve demolition of existing structures and infrastructure, as well as excavation, grading, and other site preparation activities that could loosen soils and result in erosion or loss of topsoil. Two ephemeral drainage features, Drainage 1 and Drainage 2, currently occur on-site. Drainage 1 enters the Phase 1 area from a 60-inch box culvert beneath Frontage Road and flows east within the site. Drainage 2 is a roadside ditch that extends from the western boundary of the site to the northwest corner of Orange Avenue and Barrett Avenue and overlaps with planned right-of-way improvements. Both drainages would be removed as part of Project construction. However, due to their ephemeral nature, only conveying runoff during large storm events, and because permanent storm drainage improvements would be constructed, their removal would not result in increased erosion or siltation. The Specific Plan area is generally flat and does not contain slopes that would otherwise contribute to erosion or siltation concerns.

Pursuant to the NPDES Construction General Permit, as adopted in Perris Municipal Code Chapter 14.22, a SWPPP would be prepared by a Qualified SWPPP Developer and implemented during construction. The SWPPP would include site-specific BMPs to control erosion and prevent alteration of drainage patterns, such as silt fencing, fiber rolls, stabilized construction entrances, storm drain inlet protection, hydroseeding, stockpile management, and spill prevention measures. A Qualified SWPPP Practitioner would be responsible for monitoring and inspecting compliance throughout the construction period, and BMPs would be amended as needed to protect against substantial erosion or drainage alteration. Compliance with the Construction General Permit and implementation of the SWPPP would ensure that construction-related impacts related to alteration of a drainage pattern or erosion would be less than significant.

Operation – Phase 1 Development

Pervious areas would be landscaped with groundcover, preventing substantial erosion during storm events. Following completion of construction, there would be no substantial areas of exposed soil on-site. Stormwater runoff from impervious surfaces would be conveyed to bioretention basins and underground stormwater chambers, as described in Table 5.10-2 of the Draft EIR. These systems are designed to capture and treat runoff from peak flow events, including 100-year storm events, as documented in the Preliminary WQMP (Draft EIR Appendix O). The City's Public Works Department would review and approve grading and drainage plans as part of the permitting process to ensure compliance with the City's NPDES Permit and implementation of BMPs under a project-specific WQMP. Therefore, operational impacts related to erosion or siltation in Phase 1 would be less than significant.

Operation – Phase 2 Buildout

Impacts associated with Phase 2 Buildout would be consistent with those identified for Phase 1. Future development would be required to comply with the City's NPDES Permit and implement a WQMP pursuant to Section 14.22.090 of the Perris Municipal Code. The WQMP would include site-specific BMPs to control runoff, erosion, and siltation. The City's Public Works Department would review drainage and water quality plans during permitting to ensure compliance with applicable standards. Therefore, adherence to existing regulatory requirements would ensure that impacts related to alteration of a drainage pattern and erosion or siltation during operation of Phase 2 would be less than significant.

Impact HYD-4 Finding: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site (Draft EIR at p. 5.10-19). Impacts would be less than significant.

Facts in Support of Finding:

Construction

According to FEMA Flood Insurance Rate Map 06065C1430H, the Specific Plan area is located within Flood Zone X, which is defined as an area with minimal flood hazard. Additionally, the City of Perris General Plan Safety Element (Figure 5.10-1 of the Draft EIR, *Dam Inundation Map*) indicates that the eastern portion of the site is within a dam inundation hazard zone associated with the Perris Dam. Under existing conditions, on-site drainage sheet flows eastward across the site until reaching Perris Boulevard, where it is captured by the City and County storm drain system and ultimately discharged to the Perris Valley Channel. As described above, two ephemeral drainage features, Drainage 1 and Drainage 2, are currently located on-site.

Construction of the Project would require removal of both ephemeral drainages and alteration of the existing drainage pattern. As with most construction activities, grading and earth movement have the potential to cause temporary drainage disruption and increase the potential for on- or off-site flooding if not properly managed. However, consistent with the City's NPDES Permit, the Project would be required to prepare and implement a SWPPP during construction. The SWPPP would identify site-specific BMPs to manage drainage and prevent localized flooding, including temporary detention facilities, sediment controls, and erosion prevention measures. A Qualified SWPPP Practitioner would conduct ongoing inspections to ensure compliance and to implement corrective actions as needed. The City would verify compliance through its construction permitting and inspection process. Therefore, with implementation of a SWPPP and compliance with existing regulatory requirements, construction of the Project would not result in flooding on- or off-site, and impacts would be less than significant.

Operation – Phase 1 Development

As described previously, Phase 1 of the Project would result in a substantial increase in impervious surface area relative to existing conditions, which would increase the volume and rate of stormwater runoff. To address this, the Project includes installation of a comprehensive stormwater management system designed to accommodate flows from a 100-year storm event. As detailed in the Preliminary WQMP (Appendix O of the Draft EIR), proposed stormwater infrastructure for Phase 1 includes bioretention basins, underground stormwater chambers, landscaped pervious areas, and new storm drain lines. Stormwater runoff would be collected through a system of sheet flows and subsurface drains, routed through pretreatment basins, and ultimately discharged into improved off-site drainage facilities, as shown on Figure 3-26 of the Draft EIR, *Stormwater Infrastructure Improvements*.

The proposed stormwater facilities have been sized consistent with City of Perris MS4 Permit requirements, the Perris Municipal Code, and the objectives of the Perris Valley Master Drainage Plan. Landscaped areas and infiltration facilities would regulate flow velocity and discharge rates, ensuring that post-development conditions would not result in flooding. Thus, implementation of the Phase 1 development would not substantially increase the rate or amount of surface runoff, such that flooding would occur and potential impacts would be less than significant.

Operation – Phase 2 Buildout

Impacts related to runoff and flooding under the Phase 2 Buildout scenario would be similar to those described for Phase 1. While site-specific development plans have not yet been prepared for the Phase 2 area, the Preliminary WQMP (Appendix O of the Draft EIR) evaluated stormwater flows associated with full buildout of the Specific Plan area, including Phase 2, to ensure that proposed infrastructure would be adequate to accommodate future development. All future development within Phase 2 would be subject to the same regulatory requirements, including preparation of project-specific WQMPs and compliance with the City's NPDES Permit pursuant to Section 14.22.090 of the Perris Municipal Code. WQMPs would be reviewed and approved by the City to ensure that drainage facilities are properly sized and consistent with the MS4 Permit, the Perris Municipal Code, and the Riverside County Drainage Area Management Plan. Thus, future development of Phase 2 of the Specific Plan would not substantially increase the rate or amount of surface runoff such that flooding would occur, and potential impacts would be less than significant.

Impact HYD-5 Finding: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff (Draft EIR at p. 5.10-20). Impacts would be less than significant.

Facts in Support of Finding: As discussed above, development of the Specific Plan, including both Phase 1 and Phase 2, would include installation of a subsurface storm drain system designed to collect runoff from impervious areas and convey it to on-site bioretention basins or underground stormwater chambers. These facilities have been designed to accommodate the anticipated runoff volumes from the Specific Plan area. In addition, landscaped areas throughout the Project site would receive and infiltrate runoff from adjacent impervious surfaces.

As described previously, Section 14.22.090 of the Perris Municipal Code incorporates the requirements of the City's NPDES Storm Water Permit, which requires preparation of a project-specific WQMP. The WQMP must include BMPs for source control, pollution prevention, site design, and structural treatment. As part of the City's development review process, construction plans would be required to demonstrate compliance with these requirements to ensure water quality is protected. The City's Public Works Department would review the Project's grading, drainage, erosion control, and water quality plans prior to issuance of grading permits. Compliance with these requirements would ensure that potential impacts related to stormwater drainage and polluted runoff would be less than significant.

Impact HYD-6 Finding: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows (Draft EIR at p. 5.10-21). Impacts would be less than significant.

Facts in Support of Finding: The Phase 1 area of the Specific Plan is partially developed and currently contains approximately 30,000 square feet of impervious surface. Full buildout of the Business Park, Community Shopping Center, and Big Box Retail components would result in approximately 6,563,185 square feet of impervious surface within Phase 1, representing a net increase of approximately 6,533,185 square feet. Under existing conditions, drainage generally flows eastward until reaching Perris Boulevard, where it is collected by existing City and County storm drain facilities and ultimately conveyed to the Perris Valley Channel. As discussed previously, two ephemeral drainage features are located on-site. Both drainage features only convey flows during significant storm events, and their removal as part of site development would not substantially alter the site's overall drainage pattern.

The proposed Project would include surface bioretention basins and subsurface stormwater chambers designed to regulate the rate and velocity of stormwater runoff and manage discharge to the off-site drainage system. These facilities have been sized to accommodate flows associated with the 100-year storm event and are consistent with the Riverside County Flood Control District drainage plans and MS4 permit requirements. Although the Project would result in a substantial increase in impervious surface area, the proposed drainage improvements would maintain the existing general drainage pattern and adequately accommodate storm flows. Therefore, potential impacts would be less than significant.

Impact WQ-7 Finding: The Project would not, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation (Draft EIR at p. 5.10-22). Impacts would be less than significant.

Facts in Support of Finding: According to the FEMA Map 06065C1430H, the Project site is within Flood Zone X, an area with minimal flood hazard. Therefore, the Specific Plan area would not be at risk of the release of pollutants due to Project inundation from flooding.

The Project site is located approximately 45 miles northeast of the Pacific Ocean and separated by the Santa Ana Mountains. Therefore, the Project is not located within a tsunami zone and no impacts would occur.

The Perris Reservoir, approximately 6 miles northeast of the Project site, potentially poses a seiche risk to the Project site. As shown in Figure 5.10-1 from the Draft EIR, *Dam Inundation Map,* from the City of Perris General Plan Safety Element, the eastern portion of the Specific Plan area is located within a dam inundation hazard zone related to the Perris Dam. The California Department of Water Resources is implementing the Perris Dam Modernization Project to improve seismic safety. Upgrades completed in 2018 included foundation stabilization and construction of a stability berm to withstand a magnitude 7.5 earthquake. The final phase, an Emergency Release Facility to allow controlled drawdown after a seismic event, is expected to be completed in 2026. Therefore, potential impacts related to seiche would be less than significant.

Impact WQ-8 Finding: The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (Draft EIR at p. 5.10-22). Impacts would be less than significant.

Facts in Support of Finding: According to the EMWD 2020 Urban Water Management Plan (UWMP), existing and projected supplies from groundwater, surface water, imported water, recycled water, and conservation measures are anticipated to meet future demand throughout EMWD's service area, including the Project. Furthermore, as stated in the Water Supply Assessment prepared for the Project, the anticipated water demand is within the forecasted estimates and accounted for in the UWMP (Draft EIR Appendix U).

Although the Project would increase impervious surfaces within the Specific Plan area, the proposed storm drain system has been sized to accommodate the resulting increase in runoff. Stormwater would be directed to on-site bioretention basins or subsurface chambers, where it would be retained, slowed, and/or filtered before discharge to the existing storm drain system through new connections. As discussed previously, Perris Municipal Code Chapter 15 incorporates the County's NPDES Storm Water Permit requirements, which mandate preparation of a WQMP for new development. Prior to grading permit issuance, the City's Public Works Department would review construction plans to ensure compliance with applicable requirements for grading, drainage, erosion control, and water quality. Compliance with these standards would ensure that the Project would not conflict with or obstruct implementation of the regional water quality control plan.

The Project would utilize groundwater from a relocated on-site well for landscape irrigation. Groundwater has historically been used on the site for both agricultural and domestic purposes. The Project site is located within the North Perris subbasin of the West San Jacinto Basin, which is not adjudicated and is managed by EMWD under its Groundwater Management Plan and GSP. As described previously, development of the Specific Plan area would not substantially reduce groundwater recharge, given that existing site soils exhibit low infiltration rates and the site is not within a designated groundwater recharge area. Therefore, the Project would not conflict with or obstruct implementation of the applicable groundwater management plan. Potential impacts related to water quality or groundwater management planning would be less than significant.

Hydrology and Water Quality Cumulative Finding: The Project would not result in cumulative impacts related to hydrology and water quality (Draft EIR at p. 5.10-23).

Facts in Support of Finding:

Water Quality

The cumulative water quality impact assessment considers the proposed Project in conjunction with other planned and approved development projects listed in Section 5.0 of the Draft EIR, within the context of the Santa Ana River watershed. This watershed is the appropriate geographic scope for cumulative impacts related to hydrology and water quality because individual development projects could incrementally contribute to existing impairments or introduce new pollutants into the watershed. However, all related development within the watershed is required to comply with applicable water quality regulations, including the NPDES General Construction Permit. This permit requires implementation of a SWPPP during construction, and post-construction measures such as LID strategies and BMPs to reduce the discharge of pollutants, limit

erosion and sedimentation, minimize runoff, and improve filtration and infiltration. These regulatory requirements are intended to limit incremental contributions from individual projects so they do not become cumulatively considerable. As described previously, the Project would comply with all applicable federal, State, and local regulations related to water quality. Compliance would be verified by the City of Perris during the development permitting process. Therefore, the Project cumulative impacts related to water quality would be less than significant.

Hydrology

The geographic scope for cumulative impacts related to hydrology includes the drainage area served by the existing and proposed stormwater infrastructure that would serve the Project, from points of capture to points of discharge. As described above, the amount of pervious area on-site would increase compared to existing conditions, and stormwater flows would be managed by the proposed drainage infrastructure. This includes on-site bioretention basins, underground detention chambers, and new on- and off-site stormwater conveyance facilities. Existing drainage patterns would be preserved. Consequently, the Project would not generate runoff that could combine with runoff from other cumulative projects in a way that would adversely affect hydrologic conditions. Therefore, cumulative hydrology impacts would be less than significant.

Groundwater

The appropriate geographic scope for cumulative groundwater impacts includes the North Perris subbasin of the West San Jacinto Groundwater Basin. As noted previously, development of the Specific Plan area would not substantially reduce groundwater recharge because on-site soils have low infiltration rates and the site is not within a designated recharge area. Therefore, the Project would not interfere with or diminish groundwater supplies in a way that could combine with effects from other development in the subbasin. Accordingly, cumulative impacts related to groundwater would be less than significant.

J. Land Use and Planning

Impact LU-1 Finding: The Project would not physically divide an established community (Draft EIR at p. 5.11-5). No impacts would occur.

Facts in Support of Finding: The Project would involve the adoption of a Specific Plan Amendment to allow for development of the Specific Plan area with 262.38 acres of Multiple Business Uses, 46.49 acres of commercial uses, 12.91 acres WQMP Drainage/Detention area, and 36.5 acres of road and infrastructure improvements. The proposed development would result in the removal of two existing residences near Orange Avenue and Indian Avenue; however, these properties were voluntarily sold by the owners and have already been vacated. No other residential communities exist within the Specific Plan area, and surrounding development is consistent with the proposed Project. Therefore, the Project would not physically divide an established community, and no impact would occur.

Impact LU-2 Finding: The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (Draft EIR at p. 5.11-5). Impacts would be less than significant.

Facts in Support of Finding: The Project would not conflict with the adopted Connect SoCal 2024 policies nor the City of Perris Good Neighbor Guidelines, as shown in the Tables 5.11-1 and 5.11-2 of the Draft EIR. Compliance with the Good Neighbor Guidelines would be conditioned upon approval for future developments within the Phase 2 area. While the Good Neighbor Guidelines are not required for Phase 1 of the Project, the Project has either been designed to be consistent with the Good Neighbor Guidelines or this Draft EIR includes mitigation measures that render the Project consistent with the Good Neighbor Guidelines. In addition, as described in Section 5.10 of the Draft EIR, *Hydrology and Water Quality*, the Project would be required to obtain the Regional MS4 permit, which requires compliance with NPDES standards for stormwater management and pollution prevention measures.

The Specific Plan area includes City of Perris General Plan land use designations of Harvest Landing Specific Plan, BP, and P. The Project includes a Specific Plan Amendment to annex three parcels into the Specific Plan area (APNs 305-060-042, 305-060-036, and 305-060-037), designate them as MBU, and add an MBU overlay to APN 305-060-038, resulting in a total Specific Plan area of 358.28 acres. The Specific Plan Amendment would revise the land use plan to replace residential zones with Multiple Business and Commercial zones. The Amendment would also increase the maximum floor area ratio within the Commercial designation from 0.35 to 0.75 and within the Multiple Business designation from 0.35 to 0.75. These increases would be consistent with the City of Perris General Plan land use designations for Commercial Community and Light Industrial. Furthermore, as shown in Table 5.11-3 of the Draft EIR, the proposed Project would be consistent with the applicable City General Plan Policies that have been adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant

Land Use and Planning Cumulative Finding: The Project would not result in cumulative impacts related to land use and planning (Draft EIR at p. 5.11-30).

Facts in Support of Finding: Cumulative projects in the City of Perris would have the potential to result in a cumulative impact if they would, in combination, conflict with existing land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. Cumulative projects in the City of Perris would utilize regional planning documents such as Connect SoCal 2024 during planning, and the City's General Plan would be consistent with the regional plans, to the extent that they are applicable. Cumulative projects in this jurisdiction would be required to comply with the applicable land use plan or they would not be approved without a general plan amendment.

While cumulative projects could include General Plan amendments and/or zone changes, the proposed Project would be within the projected growth analyzed within the General Plan and Connect SoCal 2024. Past and present cumulative projects do not involve amendments that would eliminate the application of policies that were adopted for the purpose of avoiding or mitigating environmental effects. Determining whether any future project might include such amendments and determining the cumulative effects of any such amendments would be speculative since it cannot be known what applications that are not currently filed might request. Thus, it is expected that the land uses of cumulative projects would be consistent with policies that avoid an environmental effect; therefore, cumulatively considerable impacts from cumulative projects related to policy consistency would be less than significant.

K. Mineral Resources

Impact MIN-1 Finding: The 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 (Draft EIR at p. 7-1). No impacts would occur.

Facts in Support of Finding: As discussed within the City of Perris General Plan Environmental Impact Report, there is no land within the City of Perris that is designated as Mineral Resource Zone 2 (MRZ 2), which indicates a presence of mineral resources. As such, there are no known mineral resources within the City of Perris or Specific Plan area. Historical uses of the Specific Plan area have not included mineral extraction, nor does the Project site currently support mineral extraction. In addition, the Project does not propose any mineral extraction activities. The Project proposes the construction of MBU, commercial, and open space uses over an area of 358.28 gross acres with no planned mining operations. Therefore, implementation of the Project would not result in the loss of availability of a valuable known mineral resource.

Impact MIN-2 Finding: The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on the General Plan, specific plan or other land use plan (Draft EIR at p. 7-1). No impacts would occur.

Facts in Support of Finding: As described above, The City of Perris General Plan EIR indicates that no land within the City is classified as MRZ-2, which signifies known mineral occurrences. The Specific Plan area has

never supported mineral extraction, contains no mapped mineral resource recovery sites, and the Project does not include any mining activities. Therefore, no impacts related to the loss of availability of a locally important mineral resource recovery site, as delineated on a local general plan, specific plan, or other land use plan, would occur as a result of the Project.

Mineral Resources Cumulative Finding: The Project would not result in cumulative impacts related to mineral resources (Draft EIR at p. 7-1).

Facts in Support of Finding: The Project area has not historically included mineral extraction, nor does the Project area currently support mineral extraction or have identified mineral resources. Thus, implementation of the Project would not result in significant impacts to mineral resources and impacts would not be cumulatively considerable.

L. <u>Noise</u>

Impact NOI-2 Finding: The Project would not result in the generation of excessive groundborne vibration or groundborne noise levels (Draft EIR at p. 5.12-41). Impacts would be less than significant.

Facts in Support of Finding:

Construction

Construction activities for development of the Project would include site preparation, grading, building construction, paving, architectural coating, which have the potential to generate low levels of groundborne vibration. People working in close proximity to the construction could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities.

Draft EIR Table 5.11-22, *Construction Vibration Levels*, presents the expected Project related vibration levels at the nearby receiver locations. At distances ranging from 66 feet to 726 feet from construction activities, construction vibration levels are estimated to be between 0.001 and 0.049 inch per second PPV. As such, construction vibration levels would not exceed the threshold of 0.3 inch per second PPV threshold at any sensitive receiver locations. Therefore, impacts related to construction vibration would be less than significant.

Operation

Operation of the proposed Project would include heavy trucks for loading dock activities, deliveries, and moving trucks, and garbage trucks for solid waste disposal. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. According to the FTA *Transit Noise Impact and Vibration Assessment* trucks rarely create vibrations that exceed 70 VdB (0.0032 PPV in/sec) (unless there are bumps due to frequent potholes in the road). Since the trucks on nearby roadways and on site would be travelling at low speeds on smooth surfaces, it is expected that delivery truck vibration impacts at nearby receiver locations would be less than the vibration perceptibility threshold of 0.3 PPV in/sec and therefore, would be less than significant.

Impact NOI-3 Finding: The Project would not expose people residing or working in the Project area to excessive noise levels, 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 (Draft EIR at p. 5.12-42). Impacts would be less than significant.

Facts in Support of Finding: As shown in Figure 5.12-2 of the Draft EIR, the Perris Valley Airport is located approximately 2.3 miles southwest of the Specific Plan area and the site is located outside of the airport's 55 dBA CNEL noise level contour. In addition, March ARB/IPA is located approximately 2.9 miles northwest of the Specific Plan area. The Specific Plan area is located outside of the March ARB/IPA 60 dBA CNEL airport noise level contour boundaries, as shown in Figure 5.12-3 of the Draft EIR. Thus, implementation and

development of the Project would not result in a safety hazard or exposure to excessive noise for people residing or working in the area, and impacts would be less than significant.

M. Population and Housing

Impact POP-1 Finding: The Project would not induce substantial unplanned population growth in an area, either directly or indirectly (Draft EIR at p. 5.13-6). Impacts would be less than significant.

Facts in Support of Finding:

Construction

Construction of the Project would occur in two primary phases, with Phase 1 anticipated to begin in 2025 and Phase 2 reaching completion around 2030. Based on CalEEMod modeling included in Appendix B of the Draft EIR, construction would generate a temporary peak workforce demand of approximately 3,438 workers. However, this labor force is anticipated to be drawn from the existing regional labor pool. According to the SCAG Regional Data Platform, 4,654 individuals are employed in the construction industry in the City of Perris. Within Riverside County as a whole, approximately 77,582 individuals are employed in the construction industry. In addition, there is a current 5.7 percent unemployment rate in the City and a 4.6 percent unemployment rate in Riverside County. As such, the existing labor pool would meet the construction needs of the Project. Therefore, implementation of the Project would not induce substantial unplanned population growth directly or indirectly through construction employment that could cause substantial adverse physical changes in the environment. Potential impacts would be less than significant.

Operations

Phase 1 Development. Phase 1 of the Project would develop the Specific Plan area with a commercial retail center and business park. As detailed in Section 3.0 of the Draft EIR, *Project Description*, the 139.89-acre Phase 1 Business Park site would be built out to 1,727,579 square feet of MBU uses. The Phase 1 22.16-acre Community Shopping Center would be built out to 250,457 square feet and the 24.33-acre Phase 1 Commercial Big-Box Retail site would be developed with 178,050 square feet of commercial uses. The site is located in a developed area of the City adjacent to existing roads and in close proximity to infrastructure and utilities. The Project does not involve construction of any new residential uses and would not contribute to a direct increase in the City's population.

The County of Riverside General Plan estimates that the MBU designation would employ approximately one worker for every 1,030 square feet of MBU building area and one worker for every 500 square feet of Commercial building area. Thus, buildout of Phase 1 of the proposed Project would generate approximately 2,535 employees; with 1,678 employees generated by the MBU area, and 857 employees generated in the commercial use areas. As shown in Table 5.13-4 of the Draft EIR, employment in the City of Perris is expected to increase by 15,000 jobs between 2019 and 2050. Based on these growth projections, buildout of Phase 1 would represent approximately 16.89 percent of projected employment growth within the City of Perris, with 11.18 percent growth resulting from MBU development, and 5.71 percent growth resulting from commercial development. Thus, the employment growth that would occur from Phase 1 is within the growth projections used to prepare Connect SoCal 2024. Thus, potential impacts from Phase 1 related to unplanned growth would be less than significant.

Phase 2 Buildout. The 111.83-acre Phase 2 planning area and 10.66-acre MBU Overlay area would allow up to 4,007,956 square feet of warehouse, light industrial, and/or manufacturing uses under the MBU designation. The proposed maximum allowed square footage for Phase 2 would generate up to 3,892 jobs. Based on these growth projections, buildout of Phase 2 would represent approximately 25.94 percent of the year 2050 projected employment growth within the City of Perris. Thus, unplanned population growth would not occur from buildout of Phase 2.

Specific Plan Buildout. Operation of Phase 1 at buildout would generate approximately 2,535 employees; with 1,678 employees generated by the MBU uses, and 857 employees generated in the commercial use areas. In addition, buildout of Phase 2 would generate up to 3,892 jobs. Thus, the total number of jobs at full buildout and complete occupancy of the proposed Project would be 6,427.

As detailed in Table 5.13-4 of the Draft EIR, it is estimated that the City of Perris contained 18,382 jobs in 2021 and SCAG Projections show 33,300 jobs in Perris in 2050, which is an increase of 14,918 jobs. The 6,427 jobs that would occur from implementation of the Project at full buildout and maximum capacity would be 43 percent of the anticipated growth; and therefore, consistent with SCAG projections and not result in unplanned growth. Potential impacts would be less than significant.

As shown above in Table 5.13-5 of the Draft EIR, the City of Perris is housing rich, and an increase in employment opportunities would benefit the job/housing balance in the City. The employees that would fill these roles are anticipated to come from the region, as the unemployment rate of the City of Perris as of May 2024 was 5.7 percent, City of Hemet was 6.3 percent, City of Moreno Valley was 4.6 percent, and the City of Menifee was at 4.6 percent, and the County of Riverside was 4.4 percent. Due to the existing and projected ratio of housing to jobs and the levels of unemployment, it is anticipated that new employees at the Project site would reside locally and within commuting distance (from within the City or one of the adjacent jurisdictions including Menifee, Moreno Valley, and Unincorporated Riverside County) and would not generate a need for new housing.

Infrastructure

Development of the Project would not require extension or expansion of infrastructure beyond those included in the Project to serve the proposed uses at the site. The Project includes installation of new on-site water, sewer, and stormwater drainage lines that would connect to existing adjacent infrastructure and improvement of roadways as outlined in Section 3.0 of the Draft EIR, *Project Description*. However, the Project does not involve installation of infrastructure in unserved areas or extension of infrastructure into areas that could result in future unplanned growth. Overall, the Project would not induce unplanned population growth either directly or indirectly that could cause substantial adverse physical changes in the environment, and potential impacts would be less than significant.

Impact POP-2 Finding: The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere (Draft EIR at p. 5.13-9). No impacts would occur.

Facts in Support of Finding: Under existing conditions, the Project site is developed with two single-family residential structures and associated ancillary structures. At the time the Project's Notice of Preparation was distributed, on August 9, 2024, three single-family residential structures existing on-site, but the units were no longer occupied by residents, and therefore, the baseline condition applied for the Project is vacant. Therefore, implementation of the Project would not displace a substantial number of existing people or housing and would not necessitate the construction of replacement housing elsewhere. Implementation of the Project would result in a less than-significant impact.

Population and Housing Cumulative Finding: The Project would not result in cumulative impacts related to population and housing (Draft EIR at p. 5.13-9).

Facts in Support of Finding: Impacts from cumulative population growth are considered in the context of their consistency with local and regional planning efforts. As discussed above, full buildout of the Specific Plan area would contribute toward a more balanced jobs-to-housing ratio, and as such, the available labor pool in the City of Perris would adequately meet the Specific Plan's employment demands without directly resulting in new residents or unplanned population growth.

Also, the Project would result in a generation of approximately 6,427 permanent jobs at full buildout, which is approximately 43 percent of the employment growth projections anticipated by Connect SoCal 2024, to occur between 2019 and 2050. The Project is within the growth projections used to prepare Connect SoCal 2024, thus, potential impacts related to cumulative growth would be less than cumulatively considerable, and less than significant.

N. Public Services

Impact PS-1 Finding: The Project would not result in substantial adverse physical impacts associated with fire protection services or the provision of new or physically altered fire station facilities. (Draft EIR at p. 5.14-7). Impacts would be less than significant.

Facts in Support of Finding: As discussed in Section 5.13 of the Draft EIR, *Population and Housing*, the Project is anticipated to generate approximately 6,427 employees at full buildout, which would incrementally increase demand for fire protection and emergency medical services provided by the Riverside County Fire Department. While the City of Perris' established service standard is a four-minute response time, this threshold is not currently met in the southern portion of the City due to existing service deficiencies and the absence of a fire station in that area. The City of Perris Capital Improvement Program identifies the planned construction of a new fire station in southern Perris and upgrades to existing stations (Stations 90 and 101). These improvements are intended to address current service deficiencies, not the incremental demand generated by the proposed Project. These future facility improvements are subject to separate environmental review pursuant to CEQA.

To minimize fire risk, the proposed Project would comply with applicable fire safety standards, including those set forth in the California Fire Code and California Building Code. Project design would incorporate fire extinguishers, fire suppression systems, alarm systems, fire water pumps, and site access designed to meet fire department requirements. These features would be subject to review and approval by the Riverside County Fire Department during the permitting process. Additionally, the Project applicant would be required to pay development impact fees (DIF) pursuant to Chapter 19.68.020 of the Perris Municipal Code. These fees fund fire-related infrastructure improvements, services, and equipment needed to maintain service levels citywide.

Therefore, with compliance with applicable fire code standards and payment of development impact fees, the proposed Project would not require construction of new or expanded fire facilities that would result in physical environmental effects. Impacts related to fire protection services would be less than significant.

Impact PS-2 Finding: The Project would not result in substantial adverse physical impacts associated with police services or the provision of new or physically altered police facilities. (Draft EIR at p. 5.14-8). Impacts would be less than significant.

Facts in Support of Finding: As mentioned above, the Project is anticipated to generate approximately 6,427 employees at full buildout. This increase in employee population and associated commercial activity could incrementally increase the demand for police protection services provided by the Riverside County Sheriff's Department, which contracts with the City of Perris for law enforcement. Although the Project could generate additional service calls due to increased on-site activity, the demand would be partially offset through proposed on-site security measures. These include deployment of private security personnel, installation of security camera systems, and provision of ample on-site lighting designed to deter criminal activity, particularly during nighttime hours. Such features are expected to reduce reliance on public law enforcement resources. Furthermore, as required by Perris Municipal Code Chapter 19.68.020, the Project applicant would pay applicable development impact fees to fund facilities and services necessary to maintain acceptable levels of public safety, including law enforcement. With implementation of these measures and required payment of development impact fees, the Project would not result in the need for construction of new or expanded sheriff facilities that could cause a physical environmental impact. Therefore, impacts related to police protection services would be less than significant.

Impact PS-3 Finding: The Project would not result in substantial adverse physical impacts associated with schools. (Draft EIR at. P. 5.14-9). Impacts would be less than significant.

Facts in Support of Finding: As discussed in Section 5.13 of the Draft EIR, *Population and Housing*, the Project includes non-residential land uses and would not directly introduce new housing or residents to the area. Therefore, the Project is not anticipated to generate a substantial increase in student population that would create new demand for school facilities. Val Verde Elementary School is located within Phase 2 of the Specific Plan area. While the proposed MBU Overlay identifies this area for potential industrial use, no Project-specific development is proposed for the school site at this time. The Val Verde Unified School District retains ownership and control of the property, and any future relocation or development of a new school facility would be planned, analyzed, and implemented by the District in compliance with CEQA. Furthermore, in accordance with Senate Bill 50 (SB 50) and Government Code Section 65995, the Project applicant is required to pay school impact fees to the appropriate school district at the time of building permit issuance. Pursuant to State law, the payment of these fees constitutes full and complete mitigation for potential impacts on school facilities. Accordingly, with required payment of school impact fees in compliance with SB 50 and Government Code Section 65995, potential impacts to school services would be less than significant.

Impact PS-4 Finding: The Project would not result in substantial adverse physical impacts associated with parks. (Draft EIR at p. 5.14-9). Impacts would be less than significant.

Facts in Support of Finding: As described above, the Project consists of non-residential development and would not directly result in the addition of new housing or residents. While future employees may occasionally utilize nearby public parks, such as Copper Creek Park and Paragon Park, both located within approximately two roadway miles of the Project site, any increase in park use would be minor and not substantial enough to require the construction or expansion of recreational facilities. To further reduce demand on public park amenities, the Project would provide on-site recreational amenities for employees, including an approximately 12.91-acre water quality management basin with walking trails and fitness stations. In addition, basketball and pickleball courts would be provided within employee amenity areas for MBU buildings over 100,000 square feet (Buildings 1, 2, 3, 6, and 7). The Project would also be subject to DIF pursuant to Perris Municipal Code Chapter 19.68, which allocates a portion of collected fees to the City's Community Services Department to fund parks and recreation infrastructure and services. Therefore, the Project's incremental demand for park services would not result in the need for new or expanded public recreational facilities, and potential impacts would be less than significant.

Impact PS-5 Finding: The Project would not result in substantial adverse physical impacts associated with other public facilities. (Draft EIR p. 5.14-10). Impacts would be less than significant.

Facts in Support of Finding: The Project includes development of commercial and industrial land uses within the Specific Plan area and would not directly provide new housing or residential uses. Therefore, the Project would not result in a substantial increase in new residents that would significantly affect the use of public facilities such as libraries, community centers, post offices, or animal shelters. Nonetheless, the Project would be subject to the development impact fees established by Chapter 19.68 of the Perris Municipal Code. A portion of these fees would be allocated to the City's Community Services Department to offset the incremental demand on community amenities and public services, such as library and government facilities.

With respect to infrastructure impacts, buildout of the amended Specific Plan would generate additional vehicular traffic, including approximately 545 daily truck trips from Phase 1 and 2,280 daily truck trips from Phase 2. This increase in heavy-duty vehicle activity would contribute to wear and tear on public roadways within and adjacent to the Specific Plan area. The resulting need for road maintenance would be mitigated through the Project's payment of development impact fees (Perris Municipal Code Chapter 19.68), City Road and Bridge Benefit District fees, and the County of Riverside Transportation Uniform Mitigation Fees (TUMF) per City Ordinance No. 1352. Therefore, with the required payment of all applicable local and regional development and infrastructure fees, the Project's potential impacts to other public facilities and road maintenance needs would be less than significant.

Public Services Cumulative Finding: The Project would result in less-than-significant cumulative impacts related to public services (Draft EIR at p. 5.14-10).

Facts in Support of Finding:

Fire Protection Services

The cumulative impact analysis for fire protection services considers development of the Project in conjunction with other planned growth within the Riverside County Fire Department's service area, which includes the City of Perris. Buildout of the Project is anticipated to result in approximately 6,427 new employees, thereby incrementally increasing the demand for emergency services. The Riverside County Fire Department has indicated that existing fire stations in the City currently operate at or near capacity (see Appendix V of the Draft EIR). However, the City has acquired land and secured funding for a new fire station to be located in the southern portion of the City, which is expected to address current service deficiencies. Further, all future improvements to fire facilities would be subject to CEQA and the City's adopted environmental and public service standards. The proposed Project, along with other future developments, would contribute development impact fees consistent with Perris Municipal Code Chapter 19.68.020 to fund such improvements. Therefore, the Project's incremental contribution to fire protection service demand, in combination with other cumulative projects, would not result in a cumulatively considerable impact.

Police Protection Services

The cumulative impact analysis for police protection considers the proposed Project in the context of other regional growth within the service area of the Perris Sheriff's Station. The Project does not propose new residential development and, as described in Section 5.14 of the Draft EIR, is consistent with SCAG projections and would not result in unplanned growth. While buildout of the Specific Plan would generate new employment and visitors, increased demand for police services would be partially offset by the use of private on-site security measures and site lighting. Furthermore, all future development projects within the City, including the proposed Project, are required to pay their fair share of public service funding through development impact fees per Perris Municipal Code Chapter 19.68.020. As such, the Project would not result in cumulatively considerable impacts to police protection services.

School Facilities

The cumulative analysis for school impacts considers development of the Project alongside other growth within the service boundaries of the Val Verde Unified, Perris Elementary, and Perris Union High School Districts. The Project proposes non-residential uses and would not result in an increase in school-aged population. Under SB 50, the Project applicant is required to pay applicable school impact fees at the time of building permit issuance. These fees provide full and complete mitigation for school facility impacts under Government Code Section 65995(h). All other regional development would also be required to pay their proportionate share of school fees. Therefore, cumulative impacts to school facilities would be less than significant.

Parks and Other Government Facilities

The cumulative impact assessment for parks and public amenities considers all other planned development in the City of Perris, as identified in Section 5.0 of the Draft EIR. Because the proposed Project does not include residential uses, it would not generate a significant increase in local population or user demand for recreational and civic facilities. The Project includes on-site employee recreational amenities (e.g., basketball and pickleball courts, a 12.91-acre water quality management basin with walking trails), which further reduce any potential demand for public parks. Additionally, the Project would contribute DIF, including allocations to support recreational and government service infrastructure. Therefore, the Project would not result in cumulatively considerable impacts to parks or public service facilities.

Roadway Facilities

The cumulative assessment for roadway facilities considers the development of the Project in conjunction with other development projects in the City of Perris, as listed in Section 5.0 of the Draft EIR. The proposed Project would result in an increase in truck trips within the Project vicinity, which would result in physical deterioration of roadways within the City. However, the Project, along with cumulative projects, would be required to pay development impact fees and TUMF fees to offset the increased physical deterioration caused by trucks utilizing roadway facilities. Therefore, the Project and cumulative projects would not result in a cumulative impact related to roadway facilities.

O. Recreation

Impact REC-1 Finding: The Project would not result in increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated (Draft EIR at p. 5.15-4). Impacts would be less than significant.

Facts in Support of Finding: Section 5.13 of the Draft EIR, *Population and Housing*, conservatively estimates that the proposed Project would generate approximately 6,427 employment opportunities at full buildout, 2,535 employees from Phase 1 and 3,892 employees from Phase 2, including the Overlay area. Based on regional employment trends and current unemployment rates in surrounding jurisdictions, it is anticipated that most new employees would reside locally and would not result in a substantial population increase that would necessitate the expansion of existing park facilities.

The City of Perris' Parks and Recreation Master Plan identifies a service ratio of five acres of parkland per 1,000 residents. Even assuming all employees relocated to the City, this would equate to a need for approximately 32.14 acres of new parkland. Approximately 82.09 acres of existing public parkland are located within a two-mile radius of the Specific Plan area, including the 14.1-acre Paragon Park within walking distance. These facilities offer a range of active and passive recreational amenities. The Project would also provide new on-site recreational amenities, including a 12.91-acre water quality basin with integrated walking trails, fitness equipment, and lounge areas, as well as multiple basketball and pickleball courts associated with various buildings in Phase 1. These amenities would help meet the recreational demand of employees generated by the Project.

Additionally, the Project would be subject to DIF per Perris Municipal Code Chapter 19.68. A portion of these fees would be allocated to the City's Community Services Department to support development and maintenance of future recreational facilities. Therefore, with implementation of the on-site recreational improvements and payment of required DIF, the Project would not result in the physical deterioration of existing recreational facilities. Potential impacts to recreation would be less than significant.

Impact REC-2 Finding: The Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment (Draft EIR at p. 5.15-6). Impacts would be less than significant.

Facts in Support of Finding: As discussed in Section 5.13 of the Draft EIR, *Population and Housing*, the proposed Project is not anticipated to generate new residents and therefore would not necessitate expansion of existing park facilities. However, the Project includes the development of a 12.91-acre water quality management basin that would also serve as a recreational amenity with integrated walking paths and employee open space areas. The construction of this recreational facility is a component of the overall Project and has been included in the environmental analysis provided throughout the Draft EIR. For example, potential construction-related air emissions have been evaluated in Section 5.3, *Air Quality*, and Section 5.8, *Greenhouse Gas Emissions,* of the Draft EIR. The Project also includes additional employee-oriented amenities located near Buildings 1, 2, 3, 6, and 7, which are accounted for within the Project's overall impact analysis. Furthermore, the Project would pay applicable DIF pursuant to Perris Municipal Code Section 19.68, which would support the City's future development and maintenance of recreational facilities. Accordingly, construction of recreational facilities would not result in any additional physical environmental impacts beyond those already disclosed in the Draft EIR, and this potential impact would be less than significant.

Recreation Cumulative Finding: The Project would not result in cumulative impacts related to recreation (Draft EIR at p. 5.15-6).

Facts in Support of Finding: The cumulative assessment for parks and recreation considers the development of the Project in conjunction with other development projects in the City of Perris, as listed in Section 5.0 of the Draft EIR. The Project would construct the 12.91-acre water quality management basin and recreational area and employee amenity facilities near Buildings 1, 2, 3, 6, and 7. Due to the incorporation of recreational facilities and the payment of DIF, the Project would not increase the use of existing recreational facilities within the vicinity such that physical deterioration would occur. Thus, the Project would not contribute to the need for new or physically altered off-site facilities and would not result in a cumulative impact related to parks and recreation.

P. <u>Transportation</u>

Impact TR-1 Finding: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities (Draft EIR at p. 5.16-18). Impacts would be less than significant.

Facts in Support of Finding:

Transit, Bicycle, and Pedestrian Facilities

<u>Transit:</u> The Project vicinity is served by RTA Route 19, 27, and 30. This existing transit service would continue to serve its ridership in the area and may also serve employees of the commercial and industrial components of the Project as well as visitors of the commercial component of the Project. There are existing bus stops at the corner of Perris Boulevard and Nuevo Road and the corner of Perris Boulevard and Orange Avenue. The Project would not alter or conflict with existing transit stops and schedules, and potential impacts related to transit services would not occur.

<u>Bicycle Facilities:</u> The City of Perris General Plan Circulation Element recommends a buffered bicycle lane (Class IIB) on Perris Boulevard and Orange Avenue, and a bicycle lane (Class II) on Indian Avenue and Frontage Road. No other roadways in the Project vicinity are designated for bike lanes. The Project includes the construction of a Class II bike lane on Indian Avenue, Orange Avenue, Perris Boulevard, and Barrett Avenue, as well as a 10-foot-wide shared use trail on Frontage Road; and the Project would refresh striping on the adjacent streets, thereby improving bicycle facilities and network. The Harvest Landing Specific Plan includes various standards and guidelines for the provision of on-site and off-site roadway improvements, vehicular and non-vehicular circulation, and site access, which would be implemented for each development. Moreover, the proposed street improvements would be developed in accordance with the City and Harvest Landing Specific Plan standards and guidelines, which would be verified through the City's development review and permitting process. As a result, the Project would not result in any conflicts with City's existing and planned bike lanes. Thus, potential impacts related to bicycle facilities would not occur.

<u>Pedestrian Facilities:</u> Sidewalks currently exist along Indian Avenue north of Orange Avenue; the east side of Perris Boulevard; the east side of Barrett Avenue; Placentia Avenue; and the north side of Orange Avenue. The Project includes construction of a 10-foot-wide shared use trail along the Project frontage with Frontage Road and Perris Boulevard and construction of a 6-foot-wide sidewalk along the Project frontage along Indian Avenue, Orange Avenue, Barrett Avenue, Harvest Landing Way, and Private Drive, thereby improving pedestrian facilities and the sidewalk network. The street improvements would be developed in accordance with the City and Harvest Landing Specific Plan standards and guidelines, which would be verified through the City's development review and permitting process. As a result, the Project would not result in any conflicts with the existing and planned pedestrian network. Thus, potential impacts related to pedestrian facilities would not occur.

Truck Route Facilities: The Project would include five truck driveways along Frontage Road and installation of a truck-only Private Drive A for the industrial portion of the Phase 1 development. The commercial component of the Phase 1 development would require one truck driveway on Orange Avenue, one truck driveway on Harvest Landing Way, and one truck driveway on Barrett Avenue south of Orange Avenue. Phase 2 development without the Overlay would require at least one truck driveway on Frontage Road and at least two truck driveways along Indian Avenue. Development of the Overlay Area would require an additional truck driveway along Indian Avenue, should the site be developed. The Project would prohibit trucks from the industrial buildings from utilizing Barrett Avenue north of Orange Avenue, which would be prevented through installation of signage as required by Mitigation Measure AQ-17. Therefore, the proposed Project would be consistent with the truck routes identified in the City General Plan and the Harvest Landing Specific Plan. Thus, potential impacts related to truck route facilities would not occur.

Roadway Facilities:

Operation

Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project vicinity and would construct new roadways, Private Drive A and Harvest Landing Way. In addition, the Project would vacate Indian Avenue south of Orange Avenue and extend Barrett Avenue south of Orange Avenue. As described in Section 3.0 of the Draft EIR, *Project Description*, approximately 36.5 acres of land within Phase 1 would be dedicated to roadway improvements, including improvements to Indian Avenue, Orange Avenue, Frontage Road, Perris Boulevard, Barnett Avenue, Harvest Landing Way, and Private Drive A.

As shown in Table 5.16-2 of the Draft EIR, *Project Trip Distribution*, buildout of the Specific Plan would result in approximately 40,321 daily trips, 2,778 AM peak hour trips, and 3,106 PM peak hour trips with 2,825 of those daily trips being truck trips.

Construction (Phase 1 Developments)

Construction of Phase 1 is anticipated to occur over a 12-month period. Construction-related trips generated on a daily basis throughout various construction activities would be derived from construction workers and delivery of materials. During construction, there would also be passenger car construction trips associated with crew arrivals and departures. It is anticipated Project construction would generate haul trips distributed throughout the day and that construction crews would arrive and depart outside the peak hours, while delivery trucks would arrive and depart throughout the day. As shown on Table 5.16-3 of the Draft EIR, *Phase 1 Daily One-Way Construction Vehicle Trips*, the grading phase of construction would generate the most vehicular trips per day from approximately 1,134 one-way hauling trips, 123 one-way worker trips, and 51 one-way vendor trips, which would result in a total of 1,308 one-way trips or 2,616 daily trips. This equates to approximately 10 percent of the daily trips that would be generated by operation of the Phase 1 portion of the Project (as shown in Table 5.16-2 of the Draft EIR). The 10 percent of the daily trips would not result in an inconsistency with the City's traffic criteria. Additionally, as described above, vendor delivery trucks would arrive and depart throughout the day and a majority of construction crews would arrive and depart outside the peak hours. Furthermore, the construction traffic would be temporary and intermittent depending on the phase of construction. Haul and vendor trucks would be required to utilize City truck routes and construction trucks would not be expected to travel along Barrett Avenue or Nuevo Road.

All construction equipment, including construction worker vehicles, would be staged within the Project site for the duration of the construction period. In addition, as part of the grading plan and building plan review processes, the City permits would require appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures (as applicable). Therefore, potential construction impacts related to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system would be less than significant. Overall, potential impacts related to transit, bicycle, pedestrian, and roadway facilities would be less than significant.

Construction (Phase 2 Buildout – With Overlay)

The same assumptions as described above for construction of phase 1 would apply for Phase 2 construction. As shown on Table 5.16-4 of the Draft EIR, *Phase 2 Daily One-Way Construction Vehicle Trips*, the building construction phase of construction would generate the most vehicular trips per day from approximately 1,683 one-way worker trips and 261 one-way vendor trips, which would result in a total of 1,944 one-way trips or 3,888 daily trips. This equates to approximately 28.8 percent of the daily trips that would be generated by operation of Phase 2 of the Project (as shown in Table 5.16-2 of the Draft EIR). Therefore, 28.8 percent of the daily trips would also not result in an inconsistency with the City's traffic criteria. Additionally, as described above, vendor delivery trucks would arrive and depart throughout the day and a majority of construction crews would arrive and depart outside the peak hours. Furthermore, the construction traffic would be temporary and intermittent depending on the phase of construction. Haul and vendor trucks would be required to utilize City truck routes and construction trucks would not be expected to travel along Frontage Road and Orange Avenue.

All construction equipment, including construction worker vehicles, would be staged within the Project site for the duration of the construction period. In addition, as part of the grading plan and building plan review processes, the City permits would require appropriate measures to facilitate the passage of persons and vehicles through/around any required lane closures (as applicable). Therefore, potential construction impacts related to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system would be less than significant. Overall, potential impacts related to transit, bicycle, pedestrian, and roadway facilities would be less than significant, and no mitigation is required.

Impact TR-3 Finding: The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) (Draft EIR at p. 5.16-27). Impacts would be less than significant.

Facts in Support of Finding:

Construction

During construction, construction worker vehicles, haul trucks, and vendor trucks would be staged on the Project site for the duration of the construction period. As part of the grading plan and building plan review processes, City permits would require appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures and measures to properly route heavy-duty construction vehicles entering and leaving the site (as applicable). As a result, impacts related to vehicular circulation design features and incompatible uses during construction of the proposed Project would be less than significant.

Operation

Site Access. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project vicinity and would construct new roadways, Private Drive A and Harvest Landing Way. In addition, the Project would vacate Indian Avenue south of Orange Avenue and extend Barrett Avenue south of Orange Avenue. As described in Section 3.0 of the Draft EIR, *Project Description*, approximately 36.5 acres of land within Phase 1 would be dedicated to roadway improvements, including improvements to Indian Avenue, Orange Avenue, Frontage Road, Perris Boulevard, Barnett Avenue, Harvest Landing Way, and Private Drive A. The Project would also include five truck driveways along Frontage Road and installation of a truck-only Private Drive A for the industrial portion of the Phase 1 development. The commercial component of the Phase 1 development would require one truck driveway on Orange Avenue, one truck driveway on Harvest Landing Way, and one truck driveway on Barrett Avenue. Phase 2 development without the Overlay would require at least one truck driveway on Frontage Road and at least two truck driveways along Indian Avenue. Development of the Overlay Area would require an additional truck driveway along Indian Avenue, should the site be developed.

On-site driveways have been evaluated to ensure that the necessary queue length is provided to ensure trucks accessing the business park buildings do not back onto Frontage Road, Orange Avenue, Harvest Landing Way, or Barrett Avenue. In addition, once tenants are known for the proposed drive-thru restaurants, a tenant-specific queueing analysis would be prepared and reviewed by City Engineering prior to issuance of a building permit. On-site traffic signing and striping would also be implemented in conjunction with detailed construction plans with implementation of the Project. Additionally, sight distance at the Project's access points would be reviewed with respect to City standards at the time of final grading, landscape, and street improvement plan reviews. Additionally, Project frontage improvements and site access points would be constructed to be consistent with the identified roadway classifications and respective cross-sections in accordance with the City of Perris General Plan Circulation Element and Harvest Landing Specific Plan. Compliance with existing regulations would be ensured through the City's construction permitting process.

Caltrans Safety Analysis. Due to queuing and safety concerns at Caltrans intersections, a queueing analysis and safety memo was prepared for the following intersections (included as Appendix T of the Draft EIR):

- I-215 NB Ramps/Placentia Avenue
- I-215 SB Ramps/Placentia Avenue
- I-215 NB Ramps/W Nuevo Road
- I-215 SB Ramps/W Nuevo Road

As shown in Table 5.16-11 of the Draft EIR, *Opening Year Cumulative Plus Project AM and PM Caltrans Queuing Analysis,* queuing deficiencies were observed under Phase 2 development 2030 with Project conditions. It was identified that under Phase 2 (Year 2030 with Project conditions), Project-generated trips would increase queue lengths at certain intersections, including the I-215 southbound ramps/West Nuevo Road intersection during the PM peak hour. Although queues would exceed striped storage lengths at some ramp intersections, additional storage space is available beyond the striped lanes, which would allow the queues to be safely accommodated. Since queues at the I-215 southbound ramps/West Nuevo Road intersection would extend into the freeway mainline under buildout conditions, a speed differential analysis was conducted. The results showed that the speed differentials between the ramp and mainline freeway during AM and PM peak hours would be 9.9 mph and 9.8 mph, respectively, which are well below the 30-mph safety threshold, as defined by *Caltrans Traffic Safety Bulletin 20-02-R1: Interim Local Development Intergovernmental Review Safety Review Practitioners Guidance*. Therefore, the Project would not result in a safety impact at any Caltrans intersections. As a result, potential impacts related to vehicular circulation design features and traffic safety would be less than significant.

Impact TR-4 Finding: The Project would not result in inadequate emergency access (Draft EIR at p. 5.16-30). Impacts would be less than significant.

Facts in Support of Finding:

Construction

During construction of the Project, roadway improvements and driveway installations could require temporary lane closures. Full roadway closures could also occur during roadway widening and repaving. A construction traffic control plan, required by standard City conditions of approval, would address such closures. In addition, construction activities would be required to implement measures to facilitate the passage of persons and vehicles through or around temporary road restrictions and to ensure safe passage in accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). Compliance with these requirements would be ensured through the City's construction permitting process. Implementation of these regulations and permitting requirements would reduce potential construction-related emergency access impacts to a less-than-significant level.

Operation

At buildout, the Project would not result in inadequate emergency access to or from the Specific Plan area. The Project would not interfere with the circulation of emergency vehicles along public streets during operation, and roadway improvements included in the Specific Plan's Infrastructure Plan would improve roadway conditions compared to existing conditions. The Project would also be required to design and construct internal access and provide fire suppression facilities (including hydrants and sprinklers) in conformance with the Perris Municipal Code. The Riverside County Fire Department would review Project development plans during the construction permitting process to ensure compliance with the Uniform Fire Code and Section 503 of the California Fire Code. Accordingly, operational impacts to emergency access would be less than significant.

Transportation Cumulative Finding: The Project would not result in cumulative impacts related to transportation (Draft EIR at p. 5.16-30).

Facts in Support of Finding: The proposed Project would not result in significant impacts related to alternative transportation or policies addressing the circulation system. Cumulative development in the City, and surrounding jurisdictions would be subject to site-specific reviews, including reviews of sidewalk, bike lane, and bus stop designs that would not allow potential cumulatively considerable impacts related to alternative transportation.

Cumulative VMT impacts are assessed based on the Project's effect on overall Citywide VMT. As shown in Table 5.16-12 of the Draft EIR, *VMT Mitigation Results for Specific Plan Buildout*, the Project would result in an overall reduction in Citywide VMT in both baseline 2024 and General Plan buildout 2045 conditions. As such, cumulative VMT impacts would be less than significant.

The proposed circulation layout would be required to be installed in conformance with City design standards to ensure that no potentially hazardous design features or inadequate emergency access would be introduced by the Project that could combine with potential hazards from other projects. In addition, cumulative development in the City and surrounding jurisdictions would be subject to site-specific reviews, including reviews by police and fire protection authorities that would not allow potential cumulatively considerable design hazards. Therefore, potential impacts related to circulation design features and emergency access would not occur from the Project and would not combine with hazards from other projects. Thus, cumulative impacts would be less than significant.

Q. <u>Utilities and Service Systems</u>

Impact UT-1 Finding: The Project would not require or result in the relocation or construction of new water facilities, the construction of which could cause significant environmental effects (Draft EIR at p. 5.18-8). Impacts would be less than significant.

Facts in Support of Finding: The Specific Plan area is currently served by Eastern Municipal Water District (EMWD) infrastructure, including a 24-inch water line in Indian Avenue, a 12-inch water line in Placentia Avenue, an 18-inch water line in North Perris Boulevard, an 8-inch water line in Orange Avenue west of Indian Avenue, and a 12-inch water line in Orange Avenue east of Barrett Avenue. These lines currently provide service to the Specific Plan area and surrounding development.

Buildout of the Project would increase water demand by approximately 561.68 acre-feet per year. Due to insufficient transmission capacity, the Project would include construction of new 8-inch water lines along Barrett Avenue, Orange Avenue, and Frontage Road, as well as a new 8-inch water line within Walmart Supercenter Drive. The Project would also abandon two existing water wells, one southeast of the Perris Boulevard and Orange Avenue intersection and one at 2364 Indian Avenue and would construct a new well within the WQMP area for non-potable irrigation use.

New on-site water infrastructure would serve the proposed business park, commercial, and landscaping areas using plumbing fixtures that comply with CALGreen standards. Construction of these facilities is part

of the Project and analyzed throughout the Draft EIR. For example, construction emissions are evaluated in Section 5.3 of the Draft EIR, *Air Quality*, and Section 5.8, *Greenhouse Gas Emissions*; and construction noise is addressed in Section 5.12, *Noise*. Therefore, the Project would not require construction of additional off-site water facilities or expansion of existing off-site facilities beyond what is already evaluated, and impacts would be less than significant.

Impact UT-2 Finding: Sufficient water supplies are available to serve the Project and reasonably foreseeable development during normal, dry, and multiple dry years (Draft EIR at p. 5.18-9). Impacts would be less than significant.

Facts in Support of Finding: The EMWD Water Supply Assessment prepared for the Specific Plan estimated the Project's water demand based on the proposed land use designations and developed acreage. The 2020 UWMP previously accounted for water demand projections under the existing Harvest Landing Specific Plan and General Plan land use designations, including agriculture, business park/light industrial, warehouse, commercial, public facilities, and residential uses. The UWMP estimated that the site would generate a total water demand of 739.23 acre-feet per year (Draft EIR Appendix U). Based on the proposed Specific Plan Amendment and corresponding land uses, the Project's estimated water demand would be 561.68 acre-feet per year, as shown in Table 5.18-4 of the Draft EIR. This demand is within the projections identified in the 2020 UWMP.

The 2020 UWMP concluded that EMWD would have sufficient water supplies to meet demands under normal, single-dry, and multiple-dry year conditions through 2045. The UWMP projects increases in industrial and commercial water demands in the service area, while also forecasting increased water supplies, from 204,800 acre-feet in 2025 to 239,200 acre-feet in 2045, to accommodate regional growth. Therefore, the Project's water demand would be served by existing and planned water supplies identified in the UWMP, and impacts related to the availability of new or expanded water entitlements would be less than significant.

Impact UT-3 Finding: The Project would not require or result in the relocation or construction of new water or wastewater facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects (Draft EIR at p. 5.18-12). Impacts would be less than significant.

Facts in Support of Finding: The Project would install a new on-site and off-site sewer system that includes a new 15-inch sewer main in Perris Boulevard that would travel south on Perris Boulevard and east on Nuevo Road to Murrieta Road for approximately 8,344 linear feet, as shown in Figure 3-27 of the Draft EIR. Construction activities related to this sewer infrastructure is included as part of the Project as a whole and would not result in any physical environmental effects beyond those identified throughout this Draft EIR. Construction emissions for excavation and installation of the on-site sewer infrastructure are included in Sections 5.3, *Air Quality*, and 5.8, *Greenhouse Gas Emissions*, and were determined to result in less-than-significant impacts. Further, the sewer improvements would be consistent with EMWD sewer plans and no unplanned extensions or expansions to existing sewer or wastewater treatment systems serving the region would be required. Therefore, the Project would not result in the construction of sewer water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and potential impacts would be less than significant.

Impact UT-4 Finding: The Project would not result in a determination by the wastewater treatment provider that would serve the Project that it has inadequate capacity to serve the projects projected demand in addition to the providers existing commitments (Draft EIR at p. 5.18-13). Impacts would be less than significant.

Facts in Support of Finding: Wastewater treatment is provided to the Project area by the EMWD. Sewage from the EMWD service area is conveyed to the Perris Valley Regional Water Reclamation Facility (PVRWRF) for treatment. The current capacity of the PVRWRF is 22 million gallons per day (mgd), with an average daily flow of 15.5 mgd. Therefore, the facility would have a remaining capacity of 6.5 mgd.

Based on sewer generation factors provided in the City of Perris General Plan EIR, full buildout of the Project would result in 2.98 million gallons per day of wastewater, which would utilize approximately 46 percent of the Perris Valley Regional Water Reclamation Facility's current daily excess treatment capacity. 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 and buildout of the proposed Specific Plan amendment would not result in a capacity constraint related to serving the Project in addition to EMWD's existing commitments. Impacts to wastewater generation would be less than significant.

Impact UT-5 Finding: The Project would not require or result in the relocation or construction of new drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects (Draft EIR at p. 5.18-16). Impacts would be less than significant.

Facts in Support of Finding:

Phase 1 Development

The Project would remove all existing drainage facilities, including on-site culverts and street gutters as part of Project construction. New stormwater drainage facilities that would be developed as part of Phase 1 would include a 12.91-acre water quality management basin. In addition, new stormwater drainage facilities would, the Project would include improvements to approximately 1,400 linear feet of off-site flood control channel Perris Valley Master Drainage Plan Line K, as shown on Figure 3-26 of the Draft EIR, *Stormwater Infrastructure Improvements*.

The proposed improvements would be installed pursuant to the Perris Valley Master Drainage Plan. Impacts associated with the Project's proposed off-site stormwater drainage infrastructure are included as part of the Project and would not result in any physical environmental effects beyond those identified throughout the Draft EIR. There are no environmental impacts that would occur specifically related to the Project's proposed stormwater drainage infrastructure. Therefore, potential Phase 1 impacts related to stormwater drainage infrastructure would be less than significant.

Phase 2 Buildout

Operation of Phase 2 at buildout would be mostly consistent with impacts described under Phase 1. Developments within the Phase 2 area would be required to prepare project-specific WQMPs pursuant to Section 14.22.090 of the Perris Municipal Code, the MS4 permit requirements, and the Riverside County Drainage Area Management Plan, which would be verified during the City's development permitting process. Therefore, the buildout of Phase 2 of the Specific Plan would not result in the construction of new or expanded unplanned storm water drainage facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant.

Impact UT-6 Finding: The Project would not 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 (Draft EIR at p. 5.18-20). Impacts would be less than significant.

Facts in Support of Finding: The City of Perris contracts with a waste disposal company, CR&R Waste Management, to transport trash to the El Sobrante Landfill and the Badlands Landfill. Table 5.18-6 of the Draft EIR, *Specific Plan Buildout Wastewater Generation*, summarizes the characteristics of each landfill. Based on the average daily tonnage, the two landfills have a combined remaining capacity of 5,153 tons per day (tpd).

Phase 1 Development

Construction. Construction of Phase 1 would generate solid waste from construction packing and discarded materials, as well as the demolition of two existing residences, which would result in approximately 2,779

tons of material being demolished and disposed of in landfills. Utilizing he U.S. Environmental Protection Agency's construction waste factor of 3.89 pounds per square foot, construction of the Project would generate approximately 4,194 tons of waste. The 2022 California Green Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65-percent of the nonhazardous construction and demolition waste. Thus, construction activities would generate approximately 2,441 tons of solid waste to be disposed of at the landfill. As described in Draft EIR Section 3.0, *Project Description,* construction activities would occur over a 12-month period. This equates to approximately 6.68 tons of debris per day (not including landfill closure days). Therefore, construction waste generated by the Project would be accommodated by the landfills that have a combined remaining capacity of 5,153 tons per day and impacts would be less than significant.

Operation. Operation of the Phase 1 development would increase the volume of solid waste generated within the landfills service area. As shown on Table 5.18-7 of the Draft EIR and based on the generation factors provided in the Perris General Plan EIR, operation of the Phase 1 development would generate approximately 19,686 tons of solid waste per year. Thus, the proposed Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs and the Project would not impair the attainment of solid waste reduction goals. Impacts related to landfill capacity from operation of Phase 1 would be less than significant. In addition, Mitigation Measure GHG-1 requires 50 percent diversion of waste for the commercial land uses and 60 percent diversion of waste for the industrial land uses, which would further reduce the volume of landfilled solid waste to approximately 7,977 tons per year or 21.9 tons per day.

Phase 2 Buildout

Construction. Applying the U.S. Environmental Protection Agency's construction waste factor of 3.89 pounds per square foot, maximum feasible development within Phase 2, including redevelopment of the MBU Overlay area, would generate approximately 7,795 tons of waste. The 2022 California Green Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65-percent of the nonhazardous construction and demolition waste. Thus, construction activities would generate approximately 2,728 tons of solid waste to be disposed of at the landfills, which have a combined remaining capacity of 5,153 tons per day. Therefore, construction waste generated by the Project would be accommodated by the landfills and would not result in excess waste.

Operation. As shown on Table 5.18-8 of the Draft EIR, *Phase 2 Solid Waste Generation*, and based on the generation factors provided in the Perris General Plan EIR, operation of the future development in Phase 2 would generate approximately 43,286 tons of solid waste per year. Thus, the proposed Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs and the Project would not impair the attainment of solid waste reduction goals. Impacts related to landfill capacity from operation of the Specific Plan at buildout would be less than significant. In addition, Mitigation Measure GHG-1 requires 50 percent diversion of waste for the commercial land uses and 60 percent diversion of waste for the industrial land uses, which would further reduce the volume of landfilled solid waste to approximately 17,314 tons per year or 47.4 tons per day.

Impact UT-7 Finding: The Project would comply with Federal, State, and local management and reduction statutes and regulations related to solid waste (Draft EIR at p. 5.18-22). Impacts would be less than significant.

Facts in Support of Finding: All solid waste-generating activities within the City is subject to the requirements set forth in Section 5.408.1 of the California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Because the Project would be required by the City to recycle, the Project would not have a significant impact to any federal, State, or local statues or regulations related to solid waste. Therefore, impacts would be less

than significant. In addition, Mitigation Measure GHG-1 requires 50 percent diversion of waste for commercial land uses and 60 percent diversion of waste for industrial land uses.

Impact UT-8 Finding: The Project would not require or result in the relocation or construction of electric power, natural gas, or telecommunications facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects (Draft EIR at p. 5.18-25). Impacts would be less than significant.

Facts in Support of Finding:

Utilities and Service Systems Cumulative Finding: The Project would not result in cumulative impacts related to utilities and service systems (Draft EIR at p. 5.18-9, 5.18-14, 5.18-17, 5.18-23, and 5.18-26).

Facts in Support of Finding: As detailed, the Project would connect to existing infrastructure and is within previous projections for utilities and service systems demands. Cumulative impacts related to the provision of facilities for water, wastewater, stormwater, solid waste, and dry utility systems have been evaluated throughout the Draft EIR, primarily associated with the emissions resulting from construction. Thus, potential cumulative impacts from off-site water system expansions would not be generated by the Project.

R. Wildfire

Impact WF-1 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones and would not substantially impair an adopted emergency response plan or emergency evacuation plan (Draft EIR at p. 7-1). No impacts would occur.

Facts in Support of Finding: The Project site is not located in or near a State Responsibility Area or lands classified as very high fire hazard severity zones. The Project site is located within a developed area, surrounded by commercial and residential uses to the east and I-215 followed by industrial uses to the west. In addition, developments pursuant to the proposed Specific Plan would be built in compliance with the California Building and Fire Code, as adopted by the City. Project plans would be reviewed by the City's Building Department and the Riverside County Fire Department during the permitting process to ensure that the Project meets fire protection requirements. Therefore, the Project would not result in any impacts related to wildfire.

Impact WF-2 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones, and would not involve slope, prevailing winds, and other factors, that could exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire (Draft EIR at p. 7-1). No impacts would occur.

Facts in Support of Finding: The Project site is not within a High Fire Hazard Severity Zone. The site is flat and does not generally have prevailing winds or other factors that could exacerbate fire risks. The Project would not result in exposure of persons to pollutant concentrations from a wildfire.

Impact WF-3 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones and would not 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 (Draft EIR at p. 7-1). No impacts would occur.

Facts in Support of Finding: The Project site is not within a High Fire Hazard Severity Zone, and the Project does not include infrastructure that could exacerbate fire risks. The Project would connect to the existing utility infrastructure that is adjacent to the site. Thus, no impacts would result.

Impact WF-4 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones and would not 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 (Draft EIR at p. 7-1). No impacts would occur.

Facts in Support of Finding: The Project site is not within a High Fire Hazard Severity Zone and is in a flat area that does not contain nor is adjacent to large slopes, and the Project would not create large slopes. Furthermore, the Project includes installation of drainage facilities. Thus, the Project would not result in risks related to wildfires or risks related to downslope or downstream flooding or landslides after wildfires.

Wildfires Cumulative Finding: The Project would not result in cumulative impacts related to wildfires (Draft EIR at p. 7-1).

Facts in Support of Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones; and therefore, would not result in impacts related to wildfires and no potential of a cumulative impact would occur.

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SECTION V

IMPACTS MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

The City hereby finds that mitigation measures have been identified in the Draft EIR that would avoid or substantially lessen the following potentially significant environmental impacts to a less-than-significant level. The potentially significant impacts and the mitigation measures that would reduce them to a less-than-significant level are summarized below.

- Aesthetics
  - Light and glare
- Air Quality
  - Sensitive receptors
- Biological Resources
- Cultural Resources
  - Archaeological resources
  - Human remains
- Geology and Soils
  - Paleontological resources
- Hazards and Hazardous Materials
  - Emit hazardous emissions within one-quarter mile of a school
- Tribal Cultural Resources

A. Aesthetics

Impact AE-4 Finding: The Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area (Draft EIR at p. 5.1-11). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding: Existing sources of light in the Specific Plan vicinity include illumination from vehicle headlights, streetlights, building illumination, security lighting, and lighting from building interiors that pass-through windows. Development of the Project would introduce new sources of light and glare into the area from street lighting, parking lot, and outdoor lighting. The Specific Plan area is located in a developed area with other industrial and commercial developments as well as I-215.

Construction

There would be limited, if any, nighttime lighting required for Project construction. Perris Municipal Code Section 7.34.060 limits construction between the hours of 7:00 a.m. to 7:00 p.m. Monday to Saturday, with no construction activity permitted on Sundays and national holidays. Thus, most construction activities would occur during daytime hours during the week. Construction-related illumination would be used for limited safety and security purposes. Such security lights may result in nighttime glare to motorists on the adjacent roadways. However, this potential impact would be reduced to a less-than-significant level through the City's standard project review and approval process and with implementation of Mitigation Measure AES-1.

Operation

Phase 1 Development. Development would introduce new sources of lighting from building-mounted fixtures and parking lot lighting. Proposed building materials, including painted concrete, metal canopies, and non-reflective glazing, would not create substantial glare. Additionally, lighting would be shielded in accordance with Perris Municipal Code Section 19.02.110 and the Harvest Landing Specific Plan, minimizing light spill onto adjacent properties. Landscaping along project boundaries would also reduce the visibility of lighting sources. The Project would not expose aircraft to glare or adversely affect day or nighttime views. Therefore, light and glare impacts from Phase 1 operation would be less than significant.

Phase 2 Buildout. Development within the Phase 2 area, inclusive of the Specific Plan Overlay area, would be developed with similar architectural features as those in Phase 1 and would comply with the Perris Municipal Code Section 19.02.110 and Harvest Landing Specific Plan Development Standards and Design

Guidelines. Accordingly, potential operational light and glare impacts from Phase 2 buildout would be less than significant.

Mitigation Measures

Project-Specific Mitigation Measures

Mitigation Measure AES-1: Construction Lighting. Prior to issuance of grading permits, the Project developer(s) shall provide evidence to the City that any temporary nighttime lighting installed for security purposes shall be downward facing and hooded or shielded to prevent security light spillage outside of the staging area or direct broadcast of security light into the sky.

B. Air Quality

Impact AQ-3 Finding: The Project would not expose sensitive receptors to substantial pollutant concentrations (Draft EIR at p. 5.3-57). Impacts would be less than significant with mitigation.

Facts in Support of Finding:

Localized Construction Air Quality Impacts (Specific Plan Buildout)

Table 5.3-32 through Table 5.3-34 of the Draft EIR identify daily localized on-site emissions that are estimated to occur during construction of Phase 1 and Phase 2 of the Project, both with and without the Overlay. As shown, emissions during the peak construction activity would not exceed the South Coast AQMD's localized significance thresholds at the closest sensitive receptors that are located as close as 66 feet from the Specific Plan area. Therefore, impacts related to localized construction emissions would be less than significant. Furthermore, tables 5.3-35 through 5.3-37 of the Draft EIR provide the LST emissions with implementation of the construction-related Mitigation Measures AQ-1 through AQ-7, which are required to reduce the regional construction emissions thresholds of significance, as opposed to the localized thresholds of significance.

Localized Operational Air Quality Impacts (Specific Plan Buildout)

As shown on Tables 5.3-38 through 5.3-40 of the Draft EIR, the only localized emissions that would exceed the South Coast AQMD's localized significance thresholds at the maximally exposed off-site receptors during Project operations would be emissions of PM_{10} during operation of the Specific Plan at full buildout without the Overlay. With implementation of operational Mitigation Measures AQ-8 through AQ-19, emissions during the peak operations would be reduced to below the South Coast AQMD's localized significance thresholds at the maximally exposed receptor locations. The LST emissions generated from each of the operational scenarios with mitigation are provided in Tables 5.3-41 through 5.3-43 of the Draft EIR. Therefore, with implementation of Mitigation Measures AQ-8 through AQ-19, impacts to sensitive receptors would be less than significant.

Construction Health Risk Impacts (Specific Plan Buildout)

The land use with the greatest potential exposure to Project construction-source diesel particulate matter and gasoline dispensing emissions is located approximately 96 feet east of the Project site at the residences currently under construction at Barrett Avenue and West Placentia Avenue. This land use would experience the highest concentrations of diesel particulate matter and gasoline dispensing during Project construction due to its proximity to the Project site as well as meteorological conditions at the site.

As shown in Table 5.3-44 of the Draft EIR, at the maximally exposed individual receptor location, the maximum incremental cancer risk attributable to Project construction-source diesel particulate matter and gasoline dispensing emissions prior to mitigation is estimated at 4.46 in one million in the Phase 2 without

Overlay scenario and 4.26 in one million in the Phase 2 with Overlay scenario, which would not exceed South Coast Air Quality management District (South Coast AQMD) thresholds of significance and would be less than significant.

With implementation of the mitigation that is required for construction regional emissions (Mitigation Measures AQ-1 through AQ-7), the maximum incremental cancer risk would be reduced to 1.08 in one million in the Phase 2 without Overlay scenario and 1.03 in one million in the Phase 2 with Overlay scenario, as shown on Table 5.3-45 of the Draft EIR. As such, neither scenario would exceed the significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01 under both scenarios with and without mitigation, which would not exceed the applicable significance threshold of 1.0. Because all other modeled receptors would experience lower concentrations of diesel particulate matter and gasoline dispensing during Project construction, all other receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk. As such, the Project construction would not cause a significant human health or cancer risk to nearby land uses, and potential impacts would be less than significant.

Operational Health Risk Impacts (Specific Plan Buildout)

Residential Exposure Scenario. As described above, the existing residential land use with the greatest potential exposure to Project operational-source diesel particulate matter and gasoline dispensing emissions under both the with Overlay and without Overlay scenarios is located approximately 96 feet east of the Specific Plan area.

As shown in Table 5.3-46 of the Draft EIR, the maximum incremental cancer risk attributable to Project operational-source toxic air contaminant emissions is estimated at 13.19 in one million under the Specific Plan Buildout without Overlay scenario and 12.82 in one million under Specific Plan Buildout the with Overlay scenario, both of which would exceed the South Coast AQMD significance threshold of 10 in one million, resulting in a potentially significant impact. Therefore, the Project would be required to comply with Mitigation Measure AQ-20. As shown in Table 5.3-47 of the Draft EIR, with implementation of Mitigation Measure AQ-20, the cancer risk would be reduced to 5.74 in one million without the Overlay and 7.05 in one million with the Overlay, which would not exceed the South Coast AQMD significance threshold of 10 in one million.

Because all other modeled receptors are further from the Specific Plan area and would experience lower concentrations of toxic air contaminants during Project operation, all other receptors in the vicinity of the Project would be exposed to less emissions and therefore subject to less risk. As such, with implementation of Mitigation Measure AQ-20, potential impacts related to human health or cancer risk as a result of Project operational activity would be less than significant.

Worker Exposure Scenario. The worker receptor land use with the greatest potential exposure to Project operational toxic air contaminant emissions is located approximately 105 feet east of the Project site. As shown in Table 5.3-46 of the Draft EIR, at the maximally exposed individual worker location, the maximum incremental cancer risk impact without mitigation is 2.07 in one million without the overlay and 2.15 in one million with the overlay. With implementation of Mitigation Measure AQ-20, Table 5.3-46 of the Draft EIR shows that the cancer risk would be 2.03 in one million without the Overlay and 2.09 in one million with the Overlay, all of which are less than the South Coast AQMD significance threshold of 10 in one million. As such, the Project would not cause a significant human health or cancer risk to adjacent workers, and potential impacts would be less than significant.

School Child Exposure Scenario. Without the Overlay the nearest potential school is Val Verde Elementary School, located approximately 66 feet north of the Specific Plan area. With redevelopment of the Overlay, the nearest potential school would be Perris Early Head Start, located approximately 720 feet east of the Specific Plan area. As shown in Table 5.3-46 of the Draft EIR, at the maximally exposed individual school child location, the maximum incremental cancer risk impact attributable to the Project is calculated to be 11.58 in one million without the Overlay, and 3.23 in one million with the Overlay. As such, prior to mitigation,

the Project's operational toxic air contaminant emissions would exceed the South Coast AQMD's 10 in one million significance threshold and result in a potentially significant impact for Val Verde Elementary School under the without Overlay scenario.

With implementation of Mitigation Measure AQ-20, Table 5.3-47 of the Draft EIR shows that the cancer risk would be reduced to 5.62 in one million without the Overlay and 2.88 in one million with the Overlay, both of which are less than the significance threshold of 10 in one million. Thus, mitigation would reduce potential impacts to a less-than-significant level. Therefore, with mitigation, potential impacts related to human health or cancer risk to nearby school children would be reduced to a less-than-significant level.

Combined Construction and Operational Health Risk Impacts (Specific Plan Buildout)

As shown in Table 5.3-48 of the Draft EIR, the maximum incremental cancer risk attributable to Project construction-source and operational-source emissions is estimated at 17.65 in one million without the Overlay and 17.08 in one million with the Overlay, both of which would exceed the South Coast AQMD significance threshold of 10 in one million, resulting in a potentially significant impact. Table 5.3-49 of the Draft EIR shows that with implementation of Mitigation Measure AQ-20, the maximum incremental cancer risk attributable to Project construction-source and operational-source diesel particulate matter emissions is estimated at 6.48 in one million without the Overlay and 7.55 in one million with the Overlay, both of which are less than the significance threshold of 10 in one million. As such, with implementation of Mitigation Measure AQ-20, potential impacts related to human health or cancer risk would be less than significant.

Mitigation Measures

Proposed Project Mitigation Measures

Mitigation Measure AQ-20: The Project shall incorporate at least one of the following measures, applicable to the Phase 2 parcel located east of Indian Avenue and west of Barrett Avenue:

- The Phase 2 parcel located east of Indian Avenue and west of Barrett Avenue shall be developed such that a minimum 1,000-foot setback between building loading docks and the residential development east of Barrett Avenue is incorporated. If the Specific Plan Overlay is not being redeveloped as part of Phase 2 development, a 1,000-foot setback shall be incorporated between building loading docks and Val Verde Elementary School as well.
- Diesel-powered trucks shall be restricted from accessing the Phase 2 parcel located east of Indian Avenue and west of Barrett Avenue. Trucks accessing this parcel shall be electric-, hydrogen-, or natural gas-powered.
- Once site plans are available for Phase 2, a site specific HRA shall be prepared demonstrating that the Phase 2 development would not exceed South Coast AQMD significance thresholds. If the site-specific HRA determines that the Phase 2 development would not exceed South Coast AQMD significance thresholds, the first two measures of this Mitigation Measure shall not apply.

C. Biological Resources

Impact BIO-1 Finding: The Project would not have an adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. (Draft EIR at p. 5 .4-30). Impacts would be less than significant with mitigation.

Facts in Support of Finding:

Special-Status Plants

The Specific Plan area and off-site improvement areas contain developed, disturbed, and non-native grassland areas. As shown in Table 5.4-1 of the Draft EIR, 24 special-status plant species were evaluated for potential occurrence. None were observed during the August 18, 2023, biological survey. While most special-status plants are not expected to occur, smooth tarplant and paniculate tarplant were determined to have a low potential to be present due to their tolerance for disturbed conditions and known occurrence in the region. Smooth tarplant and paniculate tarplant are neither federally nor State listed as threatened or endangered; but are listed as California Native Plant Society Rare Plant Rank species. They are not listed as a covered species under the MSHCP. However, the site is isolated from occupied habitat, and any individuals, if present, would not be expected to contribute to long-term species conservation. Therefore, impacts to special-status plants would be less than significant.

Special-Status Animal Species

As shown in Table 5.4-2 of the Draft EIR, a total of 80 special-status animal species were evaluated for the region. Three special-status birds, including burrowing owl, white-tailed kite, and prairie falcon, were observed during surveys, and several other species, including Cooper's hawk, sharp-shinned hawk, Costa's hummingbird, northern harrier, and California horned lark, were determined to have a high potential to occur on-site based on their habitat requirements. None of the species with the potential to occur on-site are federally or State listed as endangered or threatened; however, burrowing owl is currently a candidate for State listing. In addition, burrowing owl, white-tailed kite, prairie falcon, Cooper's hawk, sharp-shinned hawk, northern harrier, California horned lark, great blue heron, and loggerhead shrike are covered species under the MSHCP. To address the potential for nesting by Costa's hummingbird and California horned lark, Mitigation Measure BIO-1 requires a preconstruction nesting bird survey. With implementation of Mitigation Measure BIO-1, potential impacts to nesting avian species would be less than significant.

As a result of burrowing owls being found on-site during the general habitat survey, focused surveys were conducted. A total of seven burrowing owls were observed during the focused burrowing owl surveys within the Phase 1 area, including adults and juveniles. Accordingly, Mitigation Measure BIO-2 requires a preconstruction burrowing owl survey and, if active burrows are detected, preparation of a Burrowing Owl Plan consistent with the California Department of Fish and Wildlife Staff Report (2012) and the Western Riverside County MSHCP. With implementation of Mitigation Measure BIO-2, impacts to burrowing owl would be reduced to less-than-significant levels. Therefore, with implementation of Mitigation Measures BIO-1 and BIO-2, impacts to special-status plant and wildlife species would be less than significant.

Impact BIO-2 Finding: The Project would not have an adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulation, or by the California Department of Fish and Game or US Fish and Wildlife Service. (Draft EIR at p. 5.4-32). Impacts would be less than significant with mitigation.

Facts in Support of Finding: Two unnamed ephemeral drainage features, Drainage 1 and Drainage 2, were identified on-site during the field survey. These drainages do not qualify as waters of the United States under the jurisdiction of the U.S. Army Corps of Engineers, but they are expected to qualify as waters of the State and fall under the regulatory authority of the Santa Ana Regional Water Quality Control Board and the California Department of Fish and Wildlife (CDFW). Based on the Jurisdictional Delineation included in the Draft EIR, approximately 0.23 acre (2,978 linear feet) of non-wetland waters of the State and approximately 0.25-acre of CDFW streambed occur within the Phase 1 and Phase 2 areas of the Specific Plan.

Both drainage features would be removed and developed as part of Phase 1 site preparation and roadway improvements. Therefore, Mitigation Measure BIO-3 requires the Project to obtain an Approved Jurisdictional Determination or waiver from the Army Corps of Engineers, submit a Report of Waste Discharge to the Regional Water Board, and obtain a Lake and Streambed Alteration Agreement from CDFW pursuant to Section 1602. In addition, the mitigation requires establishment of a 0.5-acre on-site drainage feature within the Phase 2 area at a 2:1 replacement ratio, including herbaceous riparian habitat, consistent with the

Determination of Biologically Equivalent or Superior Preservation (DBESP), included as Appendix G of the Draft EIR. As further supported by the Habitat Assessment (Draft EIR Appendix D), no additional sensitive habitats or natural communities occur within the Specific Plan area. With implementation of Mitigation Measure BIO-3, potential impacts to riparian habitat and other sensitive natural communities would be reduced to less than significant.

Impact BIO-4 Finding: The Project would not 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 (Draft EIR at p. 5.4-33). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding:

Wildlife Movement

The Specific Plan area is located in a flat, urbanized setting and does not contain riparian corridors or mountain canyons typically used as wildlife movement corridors. No established wildlife corridors were identified on-site (Draft EIR Appendix D). Areas of commercial, residential, and disturbed vacant land are located beyond the roadways adjacent to the site. Therefore, the Project would not result in impacts to established wildlife movement corridors.

Migratory Birds

The Specific Plan area contains shrubs and trees that can be utilized by nesting birds and raptors during the nesting bird season. Therefore, if vegetation is required to be removed during nesting bird season, Mitigation Measure BIO-1 has been included to require a nesting bird survey to be conducted prior to initiating vegetation clearing. With the implementation of Mitigation Measure BIO-1, potential impacts related to nesting birds would be reduced to a less-than-significant level.

Impact BIO-6 Finding: The Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan (Draft EIR at p. 5.4-33). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding: The Specific Plan area is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Mead Valley Area Plan but is not located within or adjacent to a Conservation Area or MSHCP Criteria Cell. The site is, however, located within designated survey areas for burrowing owl, Narrow Endemic Plant Species (NEPS), and Criteria Area Species (Draft EIR Appendix D).

Riparian/Riverine Areas and Vernal Pools

Regarding MSHCP Section 6.1.2, Drainage 1 and Drainage 2 were identified on-site but do not meet the definition of riparian/riverine habitat under the MSHCP due to their artificial origin and lack of appropriate vegetation. Nonetheless, because regulatory agencies are expected to assert jurisdiction, a DBESP was prepared (Appendix G of the Draft EIR). Mitigation Measure BIO-3 also requires permitting through applicable agencies and establishment of a 0.5-acre on-site drainage feature with herbaceous riparian habitat, pursuant to the DBESP. No vernal pools or suitable habitat for fairy shrimp were observed within the Specific Plan area, as supported by the Habitat Assessment (Draft EIR Appendix D). With implementation of Mitigation Measure BIO-3, the Project would not conflict with MSHCP Section 6.1.2.

Narrow Endemic Plant Species

Regarding MSHCP Section 6.1.3 (Narrow Endemic Plant Species), the Specific Plan area is within a designated survey area for NEPS species including San Diego ambrosia, spreading navarretia, California

Orcutt grass, and Wright's trichocoronis. Based on historical and field observations, the site does not support suitable habitat for these species (Draft EIR Appendix D). As such, the Project would not conflict with MSHCP Section 6.1.3.

Urban/Wildlife Interface Guidelines

With respect to MSHCP Section 6.1.4 (Urban/Wildlands Interface Guidelines), the Project site is not located within or adjacent to an MSHCP Conservation Area. Therefore, the requirements of Section 6.1.4 do not apply.

Burrowing Owl and Criteria Area Species

Regarding MSHCP Section 6.3.2 (Burrowing Owl and Criteria Area Species), the site is within a designated survey area for burrowing owl. Seven burrowing owls were observed within the Phase 1 area during focused surveys conducted in August 2023. However, Mitigation Measure BIO-2 requires a preconstruction burrowing owl survey and, if individuals are detected, preparation of a Burrowing Owl Plan consistent with CDFW and MSHCP guidelines. With implementation of Mitigation Measure BIO-2, the Project would not conflict with Section 6.3.2 in relation to burrowing owl.

Regarding MSHCP Section 6.3.2 (Criteria Area Species), the site is also within a survey area for Criteria Area Species, including San Jacinto Valley crownscale, Parish's brittlescale, Davidson's saltscale, thread-leaved brodiaea, and others. As shown in Table 5.4-1 of the Draft EIR, no suitable habitat for these species exists on-site and none were observed during site surveys. Therefore, the Project would not conflict with MSHCP Section 6.3.2.

Therefore, the Project would not result in conflicts with the adopted habitat conservation plan, due to lack of suitable environment for the Western Riverside County MSHCP Covered Species. With payment of the required MSHCP fees and implementation of Mitigation Measures BIO-2 and BIO-3, the Project would not result in any conflicts with the MSHCP, and potential impacts would be less than significant.

Biological Resources Cumulative Finding: The Project would not result in cumulatively considerable impacts to biological resources. Impacts would be less than significant with mitigation (Draft EIR at p. 5.4-35).

Facts in Support of Finding: The cumulative study area for biological resources includes the Western Riverside County MSHCP area. Cumulative development includes the Project in combination with nearby planned and approved projects identified in the Draft EIR within Table 5-1, *Cumulative Projects List*. These projects, including those adjacent to the Specific Plan area, are generally surrounded by urban development and are not located within MSHCP Criteria Cells.

Although the Project could result in potentially significant biological impacts related to nesting birds, burrowing owls, and jurisdictional waters, implementation of Mitigation Measures BIO-1 through BIO-3 would reduce those impacts to less-than-significant levels. As with the Project, other cumulative projects are required to comply with applicable federal, State, and local regulations and mitigation measures, including those required under the MSHCP, the Migratory Bird Treaty Act, and burrowing owl survey protocols. Since all projects would be required to implement their respective mitigation measures, their contribution would not be cumulatively considerable. There are no projects that would, in combination with the Project, produce a significant impact to biological resources. Therefore, potential Project impacts would be less than cumulatively considerable and would be less than significant.

Mitigation Measures

<u>Project-Specific Mitigation Measures</u>

Mitigation Measure BIO-1: Nesting Bird Survey. Site preparation activities (such as ground disturbance, construction activities, staging equipment, and/or removal of trees and vegetation) for the Project shall be avoided, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species (generally February 1 to September 15 although the nesting season may be extended due to weather and drought conditions).

If site preparation activities are proposed during the nesting/breeding season, the Project proponent shall retain a qualified biologist to conduct a pre-activity field survey prior to the issuance of grading permits for the Project to determine if active nests of species protected by the Migratory Bird Treaty Act or the California Fish and Game Code are present in the construction zone. The Project biologist shall be experienced in: identifying local and migratory bird species of special concern; conducting bird surveys using appropriate survey methodology; nesting surveying techniques, recognizing breeding and nesting behaviors, locating nests and breeding territories, and identifying nesting stages and nest success; determining/establishing appropriate avoidance and minimization measures; and monitoring the efficacy of implemented avoidance and minimization measures.

The pre-activity field surveys shall include the Project site and adjacent areas where Project activities have the potential to cause nest failure. The surveys shall be conducted at the appropriate time of day/night, during appropriate weather conditions, no more than three (3) days prior to the initiation of Project site preparation activities. The surveys shall encompass all suitable areas including trees, shrubs, bare ground, burrows, cavities, and structures. The survey duration shall take into consideration the size of the Project site; density, and complexity of the habitat; number of survey participants; survey techniques employed; and shall be sufficient to ensure the data collected is complete and accurate.

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

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

Mitigation Measure BIO-2: Preconstruction Burrowing Owl Survey & Burrowing Owl Plan. The Project proponent shall retain a qualified biologist to conduct a pre-construction survey for burrowing owls within 30 days prior to commencement of construction activities (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering). The survey shall include the Project site and all suitable burrowing owl habitat within a 500-foot buffer. The results of the survey shall be submitted to the City of Perris Planning Division prior to obtaining a grading permit. In addition, if burrowing owls are observed during the nesting bird survey (Mitigation Measure BIO-1), to be conducted within three days prior to ground disturbance or vegetation clearance, the observation shall be reported to the Riverside Conservation Authority (RCA), United States Fish and Wildlife Service (FWS), and California Department of Fish and Wildlife (CDFW). If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. An additional preconstruction survey for resident burrowing owls within three days prior to commencement of construction shall also be conducted. The pre-

construction survey and any relocation activity shall be conducted in accordance with the Burrowing Owl Survey Instructions for the Western Riverside MSHCP.

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

If burrowing owls occupy the Project site after Project activities have started, then construction activities shall be halted immediately within a 500-foot radius. The Project proponent shall notify the City of Perris Planning Division and the City shall notify the CDFW and the FWS within 48 hours of detection. A Burrowing Owl Plan, as detailed above, shall be implemented.

Mitigation Measure BIO-3: Establishment of Onsite Drainage Feature. Prior to issuance of grading permits within the Phase 1 area, the Applicant shall obtain required permits from the California Department of Fish and Wildlife (1601-1603 Streambed Alternation Permits) and Santa Ana Regional Water Quality Control Board (401 Permit). In response to the requirements associated with these permits, a Mitigation Plan shall be developed by a qualified biologist and submitted to these agencies. The Mitigation Plan shall require mitigation at a ratio of 2:1 (0.5 acre) through onsite establishment of herbaceous riparian habitat within the Phase 2 development area, or, if such credits become available, purchase of mitigation credits at a ratio of 2:1.

D. Cultural Resources

Impact CUL-2 Finding: The Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. (Draft EIR at p. 5.5-10). Impacts would be less than significant with mitigation.

Facts in Support of Finding:

Phase 1 Development

The Phase 1 site is mostly undeveloped and has been subject to past clearing and disking for weed abatement, with limited development including single-family residences. The Cultural Resources Study, included as Appendix H of the Draft EIR, included a records search which identified 45 previously recorded cultural resources within a one-mile radius of the site, including one resource previously located on-site. That resource, a former Camp Haan barrack relocated to the site between 1945 and 1952, was removed by the year 2000 and no longer remains.

A pedestrian survey of the Phase 1 area did not identify any existing archaeological resources. However, due to the proximity of previously recorded sites in the region, the Phase 1 area is considered sensitive for

the potential presence of buried or previously unknown archaeological resources. Mitigation Measure CUL-1 requires archaeological and Tribal monitoring during initial ground-disturbing activities, as well as coordination with a qualified archaeologist and a local Native American tribe. With implementation of Mitigation Measure CUL-1, potential impacts to archaeological resources during Phase 1 development would be reduced to less than significant.

Phase 2 Development

As described previously, due to the number of previously recorded prehistoric and historical archaeological sites have been identified within 1-mile of the Project site, the Phase 2 area is also sensitive to archaeological resources, and it is possible that future ground-disturbing construction activities in Phase 2 could impact archaeological resources. As such, Mitigation Measure CUL-1 would also require monitoring for all developments within the Phase 2 area to reduce potential archeological impacts to a less-than-significant level.

Impact CUL-3 Finding: The Project would not disturb any human remains, including those interred outside of formal cemeteries (Draft EIR at p. 5.5-11). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding: The Specific Plan area has not been previously used as a cemetery based on the historical background of the site provided in the Cultural Resources Study (Draft EIR Appendix H). Thus, human remains are not anticipated to be uncovered during Project construction. In addition, California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98, mandate the process to be followed in the event of an accidental discovery of any human remains and have been incorporated as Mitigation Measure CUL-2. Specifically, California Health and Safety Code Section 7050.5 requires that if human remains are discovered, disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of death, and made recommendations concerning the treatment and disposition of the human remains to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. If the coroner determines that the remains are not subject to his or her authority and if the coroner has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC. Compliance with existing law would ensure that significant impacts to human remains would not occur. Therefore, with compliance with Mitigation Measure CUL-2 and existing regulations, potential impacts from development of the proposed amended Specific Plan on human remains would be less than significant.

Cultural Resources Cumulative Finding: The Project would result in less than significant cumulative impacts related to historic and archeological resources. Impacts would be less than significant with mitigation (Draft EIR at p. 5.5-11).

Facts in Support of Finding:

Historic Resources: The Project's contribution to cumulative impacts to historical resources was analyzed in context with past projects in Riverside County that were once similarly influenced by the historical agricultural industry in the region. Record searches and field surveys determined the absence of historical resources within or adjacent to the Project site. Therefore, Project implementation would have no potential to contribute towards a significant cumulative impact to historical sites and/or resources, and cumulatively considerable impacts would not occur.

Archaeological Resources: The Project's impact to prehistoric archaeological resources was analyzed in the context of the Perris region of Riverside County, which is identified as sensitive for archaeological resources. Construction activities within the Project site, as with other development projects in the region, may uncover subsurface prehistoric archaeological resource that meet the CCR § 15064.5 definition. However, Mitigation Measure CUL-1 has been included to reduce the potential of the Project to result in an impact to an

archaeological resource that could contribute to a significant cumulative impact. Thus, with mitigation, the Project would result in a less-than-significant cumulatively considerable impact.

Disturbance of Human Remains: Mandatory compliance with the provisions of California Health and Safety Code § 7050.5, Public Resources Code § 5097 et seq., and CEQA Guidelines Section 15064.5 included as Mitigation Measure CUL-2, would assure that the Project, in addition to all development projects, treat human remains that may be uncovered during development activities in accordance with prescribed, respectful, and appropriate practices, thereby avoiding significant cumulative impacts.

Mitigation Measures

Proposed Project Mitigation Measures

Mitigation Measure CUL-1: Prior to the issuance of grading permits, the Project proponent/developer shall retain a professional archaeologist meeting the Secretary of the Interior's Professional Standards for Archaeology (U.S. Department of Interior, 2012; Registered Professional Archaeologist preferred).

The primary task of the consulting archaeologist shall be to monitor the initial ground-disturbing activities at both the subject site and any off-site project-related improvement areas for the identification of any previously unknown archaeological and/or cultural resources. Selection of the 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 Project 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, maintaining daily field notes and a photographic record, and for reporting all finds to the Project proponent/developer, property owner, and the City of Perris in a timely manner. The Project 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.

The Project proponent/developer shall also enter into an agreement with either the Pechanga Band of Indians, the Soboba Band of Luiseño Indians, the Rincon Band of Luiseño Indians, or the Agua Caliente Band of Cahuilla Indians for a tribal representative (observer/monitor) to work along with the Project archaeologist. This tribal representative will assist in the identification of Native American resources and will act as a representative between the City, the Project proponent/developer, and Native American Tribal Cultural Resources Department. The tribal representative shall be on-site during all ground-disturbing of each portion of the Project site including clearing, grubbing, tree removals, grading, trenching, etc. The tribal representative should be on-site any time the Project archaeologist is required to be on-site. Working with the Project archaeologist, the tribal representative shall have the authority to halt, redirect, or divert any activities in areas where the identification, recording, or recovery of Native American resources are on-going.

The agreement between the proponent/developer and the tribe shall include, but not be limited to:

- An agreement that artifacts will be reburied on-site and in an area of permanent protection;
- Reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist;
- Native American artifacts that cannot be avoided or relocated at the project site shall be prepared for curation at an accredited curation facility in Riverside County that meets federal standards (per 36 CFR Part 79) and available to archaeologists/researchers for further study; and
- 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.

- The Project proponent/developer shall submit a fully executed copy of the agreement to the City of Perris Planning Division to ensure compliance with this condition of approval. Upon verification, the City of Perris Planning Division shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.

In the event that archaeological resources are discovered at the Project site or within the off-site Project improvement areas, the handling of the discovered resource(s) will differ, depending on the nature of the find. Consistent with California Public Resources Code Section 21083.2(b) and Assembly Bill 52 (Chapter 532, Statutes of 2014), avoidance shall be the preferred method of preservation for Native American/tribal cultural/archaeological resources. However, it is understood that all artifacts, with the exception of human remains and related grave goods or sacred/ceremonial/religious objects, belong to the property owner. The property owner will commit to the relinquishing and curation of all artifacts identified as being of Native American origin. All artifacts, Native American or otherwise, discovered during the monitoring program shall be recorded and inventoried by the Project archaeologist.

If any Native American artifacts are identified when the tribal representative is not present, all reasonable measures will be taken to protect the resource(s) in situ and the City Planning Division and tribal representative will be notified. The designated tribal representative will be given ample time to examine the find. If the find is determined to be of sacred or religious value, the tribal representative will work with the City and Project archaeologist to protect the resource in accordance with tribal requirements. All analysis will be undertaking in a manner that avoids destruction or other adverse impacts.

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 Project archaeologist, in consultation with the designated tribal 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 South Coastal Information Center, and the tribe(s) involved with the Project.

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

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

median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

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

E. Geology and Soil

Impact GEO-6 Finding: The Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Draft EIR at p. 5.7-13). Impacts would be less than significant with mitigation.

Facts in Support of Finding: As described in the Paleontological Assessment (Draft EIR Appendix K), the Specific Plan area is underlain by undocumented fill over Pleistocene-aged alluvial fan deposits. While no fossil localities have been recorded directly within the Specific Plan area, fossil discoveries, including significant mammalian remains, have been documented within a two-mile radius. Due to the known presence of vertebrate fossils in similar sediments throughout the Inland Empire, the site is considered to have high paleontological sensitivity. Although earthmoving activities such as grading and trenching could disturb previously unknown paleontological resources, Mitigation Measure PAL-1 requires preparation and implementation of a Paleontological Resources Impact Mitigation Program (PRIMP), including monitoring during ground disturbance and recovery of any significant fossil materials encountered. With implementation of Mitigation Measure PAL-1, potential impacts to paleontological resources would be reduced to less than significant.

Geology and Soil Cumulative Finding: The Project would result in less than significant cumulative impacts related to Geology and Soil. Impacts would be less than significant with mitigation (Draft EIR at p. 5.7-13).

Facts in Support of Finding:

Geology and Soils

Direct and indirect impacts related to geology and soils would be mitigated through mandatory conformance with the California Building Code, Perris Municipal Code, and site-specific geotechnical recommendations, which will be incorporated as part of the Project's design and construction efforts. With the exception of erosion hazards, potential hazardous effects related to geologic and soil conditions are unique to each project site, and inherently restricted to the developments proposed. Because of the site-specific nature of these potential hazards and the measures to address them, there would be no direct or indirect connection to similar potential issues or cumulative effects at the Project site.

Impacts related to erosion and loss of topsoil could be cumulatively considerable. However, mandates related to the NPDES permit, preparation of a WQMP, Erosion Control Plan, and SWPPP, as well as compliance with South Coast AQMD Rule 403 (Fugitive Dust) incorporate measures during construction activities to ensure that significant erosion impacts do not occur. These requirements would ensure that erosion is controlled during both construction and operation. Because the Project and related projects within the cumulative study area, as shown on Figure 5-1 of the Draft EIR, would be subject to similar mandatory regulatory requirements to control erosion hazards during construction and long-term operation, cumulative impacts associated with wind and water erosion hazards would be less than significant.

Paleontological Resources

The cumulative paleontological impact assessment considers the development of the Project in conjunction with other development projects, as listed in Table 5-1 of the Draft EIR, in the context of the Riverside County region, which is identified as sensitive for paleontological resources due to the presence of Pleistocene-age

alluvial fan deposits. While cumulative impacts could occur through incremental loss of fossil resources from similar geologic formations, Mitigation Measure PAL-1 would ensure preparation and implementation of a PRIMP, including monitoring during ground-disturbing activities. With incorporation of Mitigation Measure PAL-1, the Project would avoid or recover potentially significant paleontological resources, thereby preventing contribution to a cumulatively considerable impact. Accordingly, cumulative impacts related to paleontological resources would be less than significant.

Mitigation Measures

Proposed Project Mitigation Measures

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

Monitoring shall be restricted to undisturbed subsurface areas of older Quaternary alluvium. The Project paleontologist shall be prepared to quickly salvage fossils as they are unearthed to avoid construction delays. The Project paleontologist shall also remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. The Project 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.

F. Hazardous Materials

Impact HAZ-3 Finding: The Project would not emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (Draft EIR at p. 5.9-18). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project would apply a MBU Overlay over the parcel containing Val Verde Elementary School at 2656 Indian Avenue. Although this overlay would allow for future redevelopment with MBU uses, this analysis conservatively assumes the school would continue operating throughout construction and operation of both Project phases.

Construction

Construction of the Project would require the use of heavy equipment that would be fueled and maintained with petroleum-based substances, which are classified as hazardous materials and may also produce hazardous emissions. As described above, the use and handling of these materials would be regulated by the DTSC, U.S. EPA, CalOSHA, and the Riverside County Department of Environmental Health. As discussed in Section 5.3, *Air Quality*, of the Draft EIR, construction-related emissions would also be regulated by South Coast AQMD Rules 401 and 403. Total construction emissions were determined not to exceed South Coast

AQMD's localized significance thresholds with implementation of mitigation. A construction health risk assessment was also conducted to assess potential health risks to the maximally exposed individual receptor. The construction HRA concluded that maximum lifetime cancer risk and non-cancer health risks would remain below established thresholds for the maximally exposed sensitive receptor (Appendix C of the Draft EIR). Therefore, with mitigation, potential construction-related impacts to schools from hazardous emissions and materials would be less than significant.

Operation – Phase 1 Development

As described previously, hazardous materials would be stored, handled, and disposed of in accordance with applicable laws and regulations. Businesses exceeding threshold quantities would be required to comply with CUPA requirements and prepare Business Emergency/Contingency Plans, which include protocols for handling hazardous materials and responding to spills or emergencies. Required containment and cleanup equipment would be maintained on-site, and workers would receive training in spill response and notification procedures involving the Riverside County Department of Environmental Health and other appropriate agencies. Furthermore, all operations would occur within the proposed buildings, with the exception of vehicular circulation, parking, and trailer-related activities such as loading and unloading. Outdoor cargo handling equipment (e.g., yard trucks, forklifts, pallet jacks) would be non-diesel powered in accordance with contemporary industry standards and Mitigation Measure AQ-10. The primary source of hazardous emissions during operations would be on-road vehicles accessing the site. State law mandates that diesel-fueled trucks comply with air quality and greenhouse gas regulations related to fuel type, engine model year, aerodynamic features, and idling restrictions.

As discussed in Section 5.3 of the Draft EIR, *Air Quality*, implementation of Mitigation Measures AQ-8 through AQ-20 would ensure that operational emissions of pollutants, including diesel particulate matter, do not exceed localized significance thresholds. An operational HRA found that the maximum lifetime cancer risk for the nearest school child receptor would be 5.62 (below the significance threshold of 10), and the maximum hazard index would be ≤0.01 (below the significance threshold of 1.0) (Appendix C of the Draft EIR). Therefore, the use of hazardous materials and generation of emissions during Phase 1 operations would not pose a significant hazard to nearby schools, and potential impacts would be less than significant with mitigation.

Operation – Phase 2 Development

Similar to Phase 1 development, future occupants of Phase 2 are not yet identified. However, typical uses for warehouse and light manufacturing facilities may involve hazardous materials such as lubricants, solvents, cleaning agents, petroleum products, paint wastes, wastewater, batteries, scrap metal, and used tires. These substances would be managed in compliance with all applicable laws and regulations. Outdoor cargo handling equipment would be non-diesel powered in line with industry practices. Hazardous emissions during operations would primarily be associated with diesel-fueled vehicles accessing the site. State laws require compliance with emissions standards including restrictions on idling, engine model years, and fuel types. As with Phase 1 development, implementation of Mitigation Measures AQ-8 through AQ-20 would ensure that pollutant emissions, including diesel particulate matter, do not exceed localized thresholds. Therefore, with mitigation, the use of hazardous materials and the generation of hazardous emissions during operation of the Phase 2 development would not result in a significant hazard to nearby schools, and impacts would be less than significant.

Mitigation Measures

Proposed Project Mitigation Measures

Mitigation Measures AQ-8 through AQ-20. As listed previously in Section VI(A), Air Quality.

G. Tribal Cultural Resources

Impact TCR-1 Finding: The Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historic Resources, or in a local register of historical resources as defined in Public Resource Code Section 5020.1(K). (Draft EIR p. 5.17-6). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding: The City sent notices regarding the Project on July 27, 2024, to California Native American tribes. In addition to the City's outreach, on November 9, 2023, a Sacred Lands File search was requested from the NAHC. On December 26, 2023, the NAHC responded that the Sacred Lands File search yielded positive results for known tribal cultural resources or sacred lands within a 1-mile radius of the Specific Plan area. The Agua Caliente Band, Rincon Band of Luiseño and the Pechanga Band responded to the City's request for consultation. During consultation, the Tribes stated that the Specific Plan area is potentially sensitive for buried cultural resources and requested Tribal Monitors to be present on-site during all ground disturbing activities. During the course of the tribal consultation process, no Native American tribe provided the City with substantial evidence indicating that tribal cultural resources, as defined in Public Resources Code Section 21074, are present within the Specific Plan area or have been found previously on the Specific Plan area. However, due to the Specific Plan area's location in an area where Native American have been discovered, there is the possibility that archaeological resources, including tribal cultural resources, could be encountered during ground disturbing construction activities. As such, Mitigation Measures CUL-1 and CUL-2 are included to require monitoring assistance by one of the consulting Tribes and measures for the inadvertent discovery of cultural resources, including human remains. With implementation of Mitigation Measures CUL-1 and CUL-2, potential impacts to tribal cultural resources would be less than significant.

Impact TCR-2 Finding: The Project would not 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 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. (Draft EIR at p. 5.17-7). Impacts would be less than significant with mitigation incorporated.

Facts in Support of Finding: The Project site contains no known resources significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. During consultation between the City and the Agua Caliente Band of Cahuilla Indians and the Rincon Band of Mission Indians, the Project was determined to result in less-than-significant impacts with implementation of monitoring during ground-disturbing construction activities. Mitigation Measures CUL-1 and CUL-2 are included requiring that an archaeological and Native American observer be present for all ground disturbing activities to monitor for any unexpected resources that may be unearthed during these activities. With implementation of Mitigation Measures CUL-1 and CUL-2, potential impacts to tribal cultural resources would be less than significant.

In the unlikely event that human remains are encountered during grading or soil disturbance activities, the California Health and Safety Code Section 7050.5 Compliance with the established regulatory framework (i.e., California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98) would provide that any potential impacts to human remains and tribal cultural resources would be less than significant.

Tribal Cultural Resources Cumulative Finding: The Project would result in less than significant cumulative impacts related to tribal cultural resources (Draft EIR 5.17-7).

Facts in Support of Finding: The cumulative tribal cultural resource impact assessment considers the development of the Project in conjunction with other development projects, as listed in Section 5.0 of this EIR, in the context of the influence areas of the tribes in the Riverside County region. There is potential for tribal cultural resources to be uncovered during construction activities from the Project. Other development projects within the region would have a similar potential to uncover tribal cultural resources. Cumulative impacts would be reduced by each development project's compliance with applicable regulations, consultations required by SB 18 and/or AB 52, and project-specific mitigation. Project implementation of Mitigation Measures CUL-1 and CUL-2 would reduce the Project's potential contribution to cumulatively significant impacts to tribal cultural resources to a less-than-significant level.

Mitigation Measures

Proposed Project Mitigation Measures

Mitigation Measure CUL-1: As listed previously in Section V(D), *Cultural Resources*.

Mitigation Measure CUL-2: Human Remains. As listed previously in Section V(D), *Cultural Resources*.

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SECTION VI

IMPACTS DETERMINED TO BE SIGNIFICANT AND UNAVOIDABLE

- Air Quality
  - Conflict with air quality plan
  - Increase in criteria pollutant
  - Cumulative
- Greenhouse Gas Emissions
- Noise
  - Noise increase
  - Cumulative
- Transportation
  - Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)

A. Air Quality

Impact AQ-1 Findings: The Project would not conflict with or obstruct implementation of an applicable air quality plan (Draft EIR page 5.3-29). Impacts would be significant and unavoidable.

Facts in Support of Finding: The South Coast Air Quality Management District's (South Coast AQMD) 2022 Air Quality Management Plan (AQMP) is the applicable air quality plan for the proposed Project site. Pursuant to Criterion No.1, which evaluates the potential of the proposed Project to increase the frequency or severity of existing air quality violations; an impact related to Consistency Criterion No. 1 would occur if the long-term emissions associated with the proposed Project would exceed South Coast AQMD's localized and regional significance thresholds. As detailed in the Draft EIR Impact AQ-2 discussion, the Project would result in regional operational-source emissions that would not exceed the South Coast AQMD thresholds of significance. Therefore, the proposed Project would not result in an impact related to Consistency Criterion No. 1.

Regarding Consistency Criterion No. 2, the 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Although the Project would exceed the applicable regional thresholds for operational emissions, the Project could be concluded to be consistent with the second consistency criterion if the operational emissions generated by the proposed Project are less than those generated under the existing land use designations. As shown in Table 5.3-7 of the Draft EIR, the operational emissions resulting from the previously approved Harvest Landing Specific Plan would be less than the emissions generated by the Project for summer VOC and $PM_{2.5}$ emissions and NOx and SOx emissions year round. Additionally, implementation of the proposed Project would result in a net increase in Summer VOC and $PM_{2.5}$ emissions and NOx and SOx emissions, as compared to the previously approved specific plan, which is the basis for the current 2022 AQMP. Therefore, the proposed Project would result in emissions greater than the previously approved project which are not necessarily accounted for in the 2022 AQMP and a ***significant and unavoidable impact*** would occur.

As implementation of the Project would include a Specific Plan Amendment, General Plan Amendment, and Zone Change for the Harvest Landing Specific Plan, and operational buildout would result in VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ emission exceedances and increase in summer VOC and $PM_{2.5}$ emissions and NOx and SOx emissions, as compared to the previously approved land uses, the Project would result in ***significant and unavoidable impacts*** and is determined to be inconsistent with the second criterion.

Overall, the Project would lead to increased regional air quality emissions that would exceed thresholds of significance after implementation of mitigation. Therefore, the proposed Project would result in a conflict with, or obstruct, implementation of the AQMP and impacts would be ***significant and unavoidable*** after implementation of the mitigation measures detailed below.

Impact AQ-2 Finding: The Project would result in a cumulatively considerable net increase of a criteria pollutant for which the Project region is non-attainment under and applicable federal or State ambient air quality standard (Draft EIR page 5.3-31). Impacts would be significant and unavoidable.

Facts in Support of Finding:

Construction

Pollutant emissions associated with construction would be generated from the following construction activities: (1) demolition, site preparation, grading, and excavation; (2) construction workers traveling to and from the Project site; (3) delivery and hauling of construction supplies to, and debris from, the Specific Plan area; (4) fuel combustion by on-site construction equipment; (5) building construction; application of architectural coatings; and paving. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants.

Construction emissions are short-term and temporary. The maximum daily construction emissions for the proposed Project were estimated using CalEEMod and the modeling includes compliance with South Coast AQMD Rules 403 and 1113 (described above) that would reduce air contaminants during construction. Table 5.3-8 of the Draft EIR provides the maximum daily emissions of criteria air pollutants from construction of the Project by phase without the Overlay based on the CalEEMod modeling and assuming that each piece of construction equipment would operate 8 hours per day. As shown, the daily emissions resulting from Project construction would exceed the thresholds of significance for emissions of VOC and NOx during construction of Phase 1 and VOC during construction of Phase 2. Table 5.3-9 of the Draft EIR provides the maximum daily emissions of criteria air pollutants from construction of Specific Plan buildout with the Overlay based on the same CalEEMod modeling assumptions. As shown, the daily emissions resulting from Project construction would also exceed the thresholds of significance for emissions of NOx and VOC.

As a result, Mitigation Measures AQ-1 through AQ-7 have been included, which require that construction use super-compliant low VOC paints, use of Tier 4 construction equipment over 50 horsepower, provision of a community liaison, limiting the amount of ground disturbance, use of newer construction equipment, and provision of meal options for construction workers. As shown on Tables 5.3-10 and 5.3-11 of the Draft EIR, with implementation of these mitigation measures, Project construction-source VOC emissions would be reduced to a less-than-significant level. However, NOx emissions would continue to exceed South Coast AQMD regional significance thresholds during construction of Phase 1. Thus, a ***significant and unavoidable impact*** related to regional construction emissions would occur.

Operation

Implementation of the proposed Project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas consumption, landscaping, applications of architectural coatings, consumer products from operation of the proposed buildings. Operation of the proposed Project would include emissions from vehicles traveling to the Specific Plan area and from vehicles in the parking lots and loading areas. The analysis of mobile emissions includes two scenarios (A and B) based on different potential truck trip lengths to identify each potential impact. Scenario A is based on trip length recommendations from the South Coast AQMD's WAIRE Program. Scenario B is based on trip lengths from Streetlight™ data collected for the Project vicinity. Additionally, for purposes of a thorough and conservative analysis, the proposed Project has been analyzed with the 10.66-acre Overlay area and without development and operation of the Overlay area, as it is unknown at this time whether the Overlay area would be built out.

Phase 1 Development. As shown on Table 5.3-12 of the Draft EIR, operation of Phase 1 of the Project in Scenario A would exceed the numerical thresholds of significance established by the South Coast AQMD for emissions of VOC, NOx, CO and PM_{10} during both the summer and winter seasons. As shown on Table 5.3-13 of the Draft EIR, for operation of buildout of Phase 1 under Scenario B, the Project would also exceed the numerical thresholds of significance established by the South Coast AQMD for emissions of VOC, NOx, CO, and PM_{10} during both the summer and winter seasons.

Phase 2 Buildout. As shown on Table 5.3-14 and Table 5.3-15 of the Draft EIR, operation of Phase 2 of the Project at buildout in Scenario A would exceed the numerical thresholds of significance established by the South Coast AQMD for emissions of VOC, NOx, and CO during both the summer and winter seasons, both with and without the proposed Overlay. As shown on Table 5.3-16 and Table 5.3-17 of the Draft EIR, buildout of Phase 2 in Scenario B would exceed the numerical thresholds of significance for emissions of VOC, NOx and PM_{10} during both the summer and winter seasons, and CO during the summer. These impacts would occur both with and without the Overlay.

Specific Plan Buildout. As shown on Table 5.3-18 and Table 5.3-19 of the Draft EIR, during operations from buildout of the Specific Plan in Scenario A, operation of the Project would exceed the numerical thresholds of significance for emissions of VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ during both the summer and winter seasons, both with and without the proposed Overlay. As shown on Table 5.3-20 and Table 5.3-21 of the Draft EIR, at Specific Plan Buildout in Scenario B, the Project would exceed the numerical thresholds of significance for emissions of VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ during both the summer and winter seasons, both with and without the Overlay.

Mitigated Operational Emissions

As a result of the exceedances of the South Coast AQMD thresholds of significance, Mitigation Measures AQ-8 through AQ-19 have been included, which implement idling regulations and require electric vehicle charging and carpool parking, electric forklifts, use of newer trucks, truck charging infrastructure, solar infrastructure, rideshare programs, electric landscape equipment, truck route signage, CARB training, and propagation of fleet incentive information. Each of these measures would contribute to reducing emissions associated with the proposed Project. In addition, trucks would be required to comply with CARB's Heavy-Duty (Tractor-Trailer) GHG Regulation, which requires SmartWay tractor trailers that include idle-reduction technologies, aerodynamic technologies, and low-rolling resistant tires that would reduce fuel consumption and associated emissions.

Phase 1 Development. As shown on Table 5.3-22 and 5.3-23 of the Draft EIR, despite implementation of Mitigation Measures AQ-8 through AQ-19, emissions during Phase 1 operations under Scenario A and Scenario B would continue to exceed the numerical thresholds of significance established by the South Coast AQMD for emissions of VOC, NOx, CO, and PM_{10} during the summer and winter season. Thus, a ***significant and unavoidable impact*** related to regional operational emissions would occur.

Phase 2 Buildout. As shown on Table 5.3-24 of the Draft EIR, despite implementation of Mitigation Measures AQ-8 through AQ-19, emissions from operation of Phase 2 with the Overlay under Scenario A would continue to exceed thresholds of significance for emissions of VOC and NOx during both the summer and winter seasons. As shown on Table 5.3-25 of the Draft EIR, despite implementation of Mitigation Measures AQ-8 through AQ-19, emissions during operation of Phase 2 with the Overlay under Scenario B would continue to exceed thresholds of significance for emissions of VOC, NOx, and PM_{10} during both the summer and winter seasons. As shown on Table 5.3-26 of the Draft EIR, with implementation of Mitigation Measures AQ-8 through AQ-19, emissions from operation of Phase 2 without the Overlay under Scenario A would continue to exceed thresholds of significance for emissions of VOC and NOx during both the summer and winter seasons. As shown on Table 5.3-27 of the Draft EIR, despite implementation of Mitigation Measures AQ-8 through AQ-19, emissions from operation of Phase 2 without the Overlay under Scenario B would continue to exceed thresholds of significance for emissions of VOC, NOx, and PM_{10} during both the summer and winter seasons. Thus, a ***significant and unavoidable impact*** related to regional operational emissions would occur.

Specific Plan Buildout. Table 5.3-28 and 5.3-29 of the Draft EIR shows that, despite implementation of Mitigation Measures AQ-8 through AQ-19, emissions from buildout of the Specific Plan with the Overlay under Scenario A and with Overlay under Scenario B, would continue to exceed thresholds of significance for emissions of VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ during both the summer and winter seasons. Table 5.3-30 and 5.3-31 of the Draft EIR shows that, despite implementation of Mitigation Measures AQ-8 through AQ-

19, emissions from buildout of the Specific Plan without the Overlay under Scenario A and under Scenario B would continue to exceed thresholds of significance for emissions of VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ during both the summer and winter seasons. Thus, a ***significant and unavoidable impact*** related to regional operational emissions would occur.

It is important to note that the majority of VOC emissions are derived from consumer products. As such, the Project applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable South Coat AQMD thresholds of significance. Additionally, it should be noted that the majority of the Project's NOx, CO, PM_{10}, and $PM_{2.5}$ emissions are derived from vehicle usage. Since neither the Project applicant nor the City have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less-than-significant.

Despite implementation of Mitigation Measures AQ-8 through AQ-19 and the future anticipated regulations from the EPA and CARB to improve truck efficiency, the operational emissions from the proposed Project would exceed the South Coast AQMD's regional significance thresholds and would cumulatively contribute to the nonattainment designations in the SCAB. On this basis, it is concluded that Project operational-source VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ emissions cannot be definitively reduced below applicable South Coast AQMD thresholds of significance and therefore are considered ***significant and unavoidable***. The proposed Project would result in a ***significant and unavoidable impact*** to regional air quality from operation of the Project.

Feasibility of Zero Emission Trucks. As of 2025, the use of zero-emission heavy-duty trucks to serve the Project remains infeasible. Commercial availability of such trucks is extremely limited, with production delays and only small numbers of vehicles delivered statewide. Supporting infrastructure, including truck-accessible charging and hydrogen refueling stations, is also very limited, with only a handful of locations capable of accommodating medium- and heavy-duty trucks. In addition, existing electrical grid capacity is insufficient to support large-scale fleet electrification at this time. Although infrastructure improvements and grid upgrades are underway, these limitations restrict zero-emission truck use to local routes only and preclude their feasibility for Project operations at this time.

Mitigated Combined Construction and Operation

The analysis of Project construction and operational emissions in the Draft EIR was completed following the guidelines set forth in South Coast AQMD's 1993 CEQA Handbook, which recommends quantifying construction and operational emissions separately and comparing each to applicable South Coast AQMD construction or operational thresholds. However, for informational purposes, Table 5.3-F1 and Table 5.3-F2 from the Final EIR show combined construction emissions from Phase 2 and operational emissions from Phase 1 with implementation of Mitigation Measures AQ-1 through AQ-19.

Health Impacts of Emissions

The South Coast AQMD discusses that it may be infeasible to quantify health risks caused by projects similar to the proposed Project, due to many factors. It is necessary to have data regarding the sources and types of air toxic contaminants, location of emission points, velocity of emissions, the meteorology and topography of the area, and the location of receptors (worker and residence). The *Brief* states that it may not be feasible to perform a health risk assessment for airborne toxics that will be emitted by a generic industrial building that was built on "speculation" (i.e., without knowing the future tenant(s). Even where a health risk assessment can be prepared, however, the resulting maximum health risk value is only a calculation of risk-it does not necessarily mean anyone will contract cancer as a result of the Project. The *Brief* also cites the author of the CARB methodology, which reported that a $PM_{2.5}$ methodology is not suited for small projects and may yield unreliable results. Similarly, South Coast AQMD staff does not currently know of a way to accurately quantify O_3-related health impacts caused by NO_X or VOC emissions from relatively small projects, due to photochemistry and regional model limitations. The *Brief* concludes, with respect to the Friant Ranch EIR, that

although it may have been technically possible to plug the data into a methodology, the results would not have been reliable or meaningful.

On the other hand, for extremely large regional projects, the South Coast AQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 lbs./day of NO_X and 89,180 lbs./day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to O_3.

The proposed Project does not generate anywhere near 6,620 pounds/day of NOx or 89,190 pounds/day of VOC emissions. As shown on Tables 5.3-7 through 5.3-30 of the Draft EIR, the Project would generate up to 179.95 pounds/day of NOx during construction with mitigation and 507.55 pounds/day of NOx during operations with mitigation (2.7% and 7.7% of 6,620 pounds/day, respectively). The VOC emissions would be a maximum of 69.60 pounds/day during construction and 331.77 pounds/day during operations (0.08% and 0.4% of 89,190 pounds/day, respectively).

Therefore, the emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level. Notwithstanding, this evaluation does evaluate each of the Project's development scenarios localized impacts to air quality for emissions of CO, NOx, PM_{10}, and $PM_{2.5}$ by comparing the on-site emissions to the South Coast AQMD's applicable LST thresholds of significance. In addition, a Health Risk Assessment was prepared. As described previously, the proposed Project would not result in emissions that exceeded the South Coast AQMD's LSTs. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or State ambient air quality standards for emissions of CO, NOx, PM_{10}, and $PM_{2.5}$. Therefore, the Project would not generate emissions on a localized scale that are expected to result in an exceedance of applicable standards, which are intended to be protective of public health.

Air Quality Cumulative Finding: The Project would have a cumulatively adverse impact related to air quality (Draft EIR at p. 5.3-68). Impacts would be significant and unavoidable.

Facts in Support of Finding: As described previously, per South Coast AQMD's methodology, if an individual project would result in air emissions of criteria pollutants that exceeds the South Coast AQMD's thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants.

As described above, after implementation of Mitigation Measures AQ-1 through AQ-7, NOx emissions would continue to exceed South Coast AQMD regional significance thresholds during construction. Also, after implementation of Mitigation Measures AQ-8 through AQ-19 operational emissions from Phase 1 would exceed thresholds of significance for VOC, NOx, CO and PM_{10}, and operational emissions from Phase 2 with and without the Overlay would exceed thresholds of significance for VOC and NOx under Scenario A, and also impacts to PM_{10} under Scenario B. Additionally, after implementation of mitigation measures, operational impacts from buildout of the Specific Plan with and without the Overlay under both scenarios would exceed thresholds of significance for emissions of VOC, NOx, CO, PM_{10} and $PM_{2.5}$. The large majority of operational-source emissions (by weight) would be generated by Project vehicles and consumer products that neither the Project applicant nor the City have the ability to reduce emissions of. Therefore, both construction and operational-source emissions from implementation of the proposed Project would be cumulatively considerable, and cumulative air quality impacts would be ***significant and unavoidable***.

South Coast AQMD does not currently have a separate methodology or threshold to evaluate a project's contribution to cumulative cancer risk. Instead, consistent with other air quality impacts, "[p]rojects that exceed the project-specific significance thresholds are considered by the South Coast AQMD to be cumulatively considerable." As detailed previously, with incorporation of Mitigation Measure AQ-20, the Project would not exceed the South Coast AQMD cancer risk threshold of 10 in one million; and therefore, would not result in a cumulatively considerable health risk impact.

As shown in Figure 5.3-2 of the Draft EIR, there are 10 cumulative projects located within 1,000 feet of the proposed Project site or Project truck routes. Of these 10 cumulative projects, eight are commercial in nature and would not generate a significant quantity of truck trips or diesel particulate matter emissions. The two remaining industrial projects include the following:

- Project 1: PP23170, 287,000 square foot warehouse, 110 daily truck trips
- Project 19: Orbis Industrial Truck Yard, 26-acre truck storage yard, 1,512 daily passenger car equivalent (PCE) trips

Compared to the approximately 2,626 daily truck trips anticipated to be generated by the proposed Project, the 110 daily truck trips generated by Project 1 would not be anticipated to significantly affect the cumulative health risk. Similarly, Project 19 would not result in a significant number of truck trips, and due to the storage lot nature of this project, would not result in significant idling emissions occurring on the site. As such, due to the relatively small size and small number of truck trips associated with these two projects, any cumulative impacts would be minimal and be less than cumulatively considerable.

Mitigation Measures

Proposed Project Mitigation Measures

Mitigation Measure AQ-1: Super-Compliant Low VOC. Project construction plans and specifications shall state that the Project shall utilize "Super-Compliant" low VOC paints for nonresidential interior and exterior surfaces and low VOC paint for parking lot surfaces. Super-Compliant low VOC and low VOC paints have been reformulated to exceed the regulatory VOC limits put forth by South Coast AQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10g/L of VOC and low VOC paints shall be no more than 50 g/L of VOC.

Mitigation Measure AQ-2: Tier 4 Final. The construction plans and specifications shall state that off-road diesel construction equipment rated at 50 horsepower (hp) or greater, complies with Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 4 Final off-road emissions standards or equivalent and shall keep all equipment maintenance records and data sheets, including design specifications and emission control tier classifications, onsite or at the contractor's office and shall furnish documents to the Lead Agency or other regulators, upon request. The Lead Agency shall conduct an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce particulate emissions.

Mitigation Measure AQ-3: The Project Applicant/Developer/Owner shall identify a person to act as a community liaison concerning onsite construction activities and operations and provide contact information for the community liaison to the surrounding community. The contact of the community liaison shall be provided to the Lead Agency and posted on the construction site prior to issuance of a demolition permit.

Mitigation Measure AQ-4: Project construction plans and specifications shall require that during Project grading operations, Project contractors shall limit the amount of daily grading disturbance area to not exceed the assumptions specified in the Draft EIR Air Quality Impact Analysis. Additionally, the Project Applicant/Developer/Contractor shall include a note on grading plans that prohibits grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone in the Project area. Daily Air Quality Index forecasts for the next day of grading shall be checked via the airnow.gov system the day prior by the Project Contractor.

Mitigation Measure AQ-5: Project construction plans and specifications shall require on-road heavy-duty haul trucks to be model year 2014 or newer if diesel-fueled pursuant to CARB's particulate matter filter requirements.

Mitigation Measure AQ-6: The Project construction plans and specifications shall require the Project Applicant/Developer/Contractor provide information on transit and ridesharing programs and services to construction employees.

Mitigation Measure AQ-7: The Project construction plans and specifications shall require that the Project Applicant/Developer shall provide meal options onsite or shuttles between the construction site and nearby meal destinations for construction employees.

Mitigation Measure AQ-8: Idling Regulations. The Project plans and specifications shall include signs at loading dock facilities that include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for trucks drivers to restrict idling to no more than 3 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park", and the parking brake is engaged pursuant to Title 13 of the California Code of Regulations, Section 2485; and 3) telephone numbers of the building facilities manager, South Coast AQMD and CARB to report violations. Signs shall be installed prior to receipt of an occupancy permit.

Mitigation Measure AQ-9: Electric Vehicle Charging Stations and Carpool Parking. The Project plans and specifications for the industrial buildings shall include electric vehicle charging stations and a minimum of 5 percent carpool parking spaces at each building for employees and the public to use.

Mitigation Measure AQ-10: Electric Interior Vehicles. The Project plans and specifications for all of the industrial buildings shall include infrastructure to support use of electric-powered forklifts and/or other interior vehicles. The requirement that all on-site yard hostlers, yard equipment, forklifts, and pallet jacks shall be zero-emissions equipment, or equivalent language, shall be incorporated in all Project facility lease documents. Prior to issuance of a Certificate of Occupancy, facility owners or tenants shall provide documentation to the City of Perris Planning Division verifying that signed lease documents incorporate the requirement that all on-site yard trucks/hostlers shall be zero-emissions equipment.

Mitigation Measure AQ-11: Transportation Management. The Project plans and specifications for the industrial buildings shall require that a Transportation Management Association (TMA) or similar mechanism shall be established by the Project to encourage and coordinate carpooling. The TMA shall advertise its services to the building occupants. The TMA shall offer transit incentives to employees and shall provide shuttle service to and from public transit, should a minimum of 5 employees request and use such service from a transit stop at the same drop-off and/or pickup time. The TMA shall distribute public transportation information to its employees. The TMA shall provide electronic message board space for coordination rides.

Mitigation Measure AQ-12: The City occupancy permitting shall require that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2014 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators which own vehicles subject to Section 2025 shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.

Mitigation Measure AQ-13: The Project plan and specifications shall include that the Project Applicant/Developer shall construct electric truck charging infrastructure within truck parking areas consisting of infrastructure (i.e., conduit) to support future installation of charging stations when such trucks are commercially available, as reasonably determined by the City of Perris Planning Division. Conduit shall be provided proportional to parking spaces at a ratio of conduit for one charging station for every 10 truck parking spaces for all buildings developed within the MBU designation. Additionally, the Project Applicant/Developer shall construct electric light- duty truck charging infrastructure consisting of infrastructure (i.e., conduit) proportional, i.e., conduit for one charging station for every five light-duty truck parking spaces at the Project for all buildings developed within the MBU designation.

Mitigation Measure AQ-14: Prior to the issuance of certificate of occupancy, the City Planning Manager, or designee, shall ensure all Project lease agreements require facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.

Mitigation Measure AQ-15: Prior to the issuance of certificate of occupancy, the City Planning Manager, or designee, shall ensure all Project lease agreements require operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.

Mitigation Measure AQ-16: Prior to the issuance of certificate of occupancy, the City Planning Manager, or designee, shall ensure all Project lease agreements require that all landscape equipment used to maintain the landscaping within the Project site shall be electric, and that Project plans support use of electrical landscaping equipment.

Mitigation Measure AQ-17: Prior to certificate of occupancy, the Project Applicant shall post signs in English and Spanish at every truck exit driveway providing directional information to the truck route.

Mitigation Measure AQ-18: Prior to the issuance of certificate of occupancy, the City Planning Manager, or designee, shall ensure leasing agreements for each industrial building require that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB- approved courses. Also, if the tenant/facility operator owns its own fleet of vehicles, subject to 13 California Code of Regulations section 2025, require such tenants/facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.

Mitigation Measure AQ-19: Prior to the issuance of certificate of occupancy, the City Planning Manager, or designee, shall ensure leasing agreements for each industrial building require that Project Applicant/Developer/Owner provide tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets, prior to issuance of each certificate of occupancy.

Mitigation Measure AQ-20: The Project shall incorporate at least one of the following measures, applicable to the Phase 2 parcel located east of Indian Avenue and west of Barrett Avenue:

- The Phase 2 parcel located east of Indian Avenue and west of Barrett Avenue shall be developed such that a minimum 1,000-foot setback between building loading docks and the residential development east of Barrett Avenue is incorporated. If the Specific Plan Overlay is not being redeveloped as part of Phase 2 development, a 1,000-foot setback shall be incorporated between building loading docks and Val Verde Elementary School as well.
- Diesel-powered trucks shall be restricted from accessing the Phase 2 parcel located east of Indian Avenue and west of Barrett Avenue. Trucks accessing this parcel shall be electric-, hydrogen-, or natural gas-powered.
- Once site plans are available for Phase 2, a site specific HRA shall be prepared demonstrating that the Phase 2 development would not exceed South Coast AQMD significance thresholds. If the site-specific HRA determines that the Phase 2 development would not exceed South Coast AQMD significance thresholds, the first two measures of this Mitigation Measure shall not apply.

B. Greenhouse Gas Emissions

Impact GHG-1 Finding: The Project would not generate greenhouse gas emissions, either directly or indirectly, in a way that would have a significant impact on the environment (Draft EIR at p. 5.8-15). Impacts would be significant and unavoidable.

Facts in Support of Finding: Implementation of the proposed Project would generate GHG emissions from construction activities, operational transportation, energy, waste disposal, and area sources (such as on-site equipment). For construction emissions, the South Coast AQMD recommends amortizing emissions over 30 years by calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life, then adding that number to the annual operational phase GHG emissions. Table 5.8-1 of the Draft EIR provides the estimated construction emissions from Project buildout. These construction emissions include emissions from buildout of the Phase 2 Overlay area.

Long-term operations of uses by the Project would generate GHG emissions from the following primary sources, area source emissions, energy source emissions, mobile source emissions, on-site cargo handling equipment emissions, stationary source emissions, water supply, treatment, and distribution, solid waste, and refrigerants. The proposed Project analysis includes two scenarios (A and B) that have been evaluated to determine the potential maximum reasonable level of impacts that could occur based on different potential truck trip lengths. Scenario A is based on trip length recommendations from South Coast AQMD's WAIRE Program and Scenario B is based on trip lengths from Streetlight™ data collected for the Project vicinity.

Scenario A With Overlay. The annual GHG emissions associated from the proposed Project in Scenario A with the Overlay are summarized in Table 5.8-2 of the Draft EIR. As shown, construction and operation of Phase 1 would generate a net total of approximately 39,767.50 $MTCO_2e$ per year, Phase 2 would generate a total of approximately 46,632.48 $MTCO_2e$ per year, and Specific Plan Buildout would generate 82,869.42 $MTCO_2e$ per year, which would exceed the significance threshold of 3,000 $MTCO_2e$ per year. Therefore, construction and operation of the proposed Project in Scenario A with the Overlay would generate significant GHG emissions.

Scenario A Without Overlay. The annual GHG emissions associated from the proposed Project in Scenario A without the Overlay are summarized in Table 5.8-3. As shown, construction and operation of Phase 1 would generate a net total of approximately 39,767.50 $MTCO_2e$ per year, Phase 2 would generate a total of approximately 42,662.95 $MTCO_2e$ per year, and Specific Plan Buildout would generate 78,867.88 $MTCO_2e$ per year, which would exceed the significance threshold of 3,000 $MTCO_2e$ per year. Therefore, construction and operation of the proposed Project without the Overlay would also generate significant GHG emissions.

Scenario B With Overlay. The annual GHG emissions associated from the proposed Project in Scenario B with the Overlay are summarized in Table 5.8-4. As shown, construction and operation of Phase 1 would generate a net total of approximately 45,462.85 $MTCO_2e$ per year, Phase 2 would generate a total of approximately 67,842.17 $MTCO_2e$ per year, and proposed Specific Plan buildout would generate 109,258.10 $MTCO_2e$ per year, which would exceed the significance threshold of 3,000 $MTCO_2e$ per year. Therefore, construction and operation of the proposed Project with the Overlay would generate significant GHG emissions.

Scenario B Without Overlay. The annual GHG emissions associated from the proposed Project in Scenario B without the Overlay are summarized in Table 5.8-5 of the Draft EIR. As shown, construction and operation of Phase 1 would generate a net total of approximately 45,462.85 $MTCO_2e$ per year, Phase 2 would generate a total of approximately 61,991.43 $MTCO_2e$ per year, and Specific Plan Buildout would generate 103,407.36 $MTCO_2e$ per year, which would exceed the significance threshold of 3,000 $MTCO_2e$ per year. Therefore, construction and operation of the proposed Project without the Overlay would also generate significant GHG emissions.

Mitigated GHG Emissions

As detailed above, the proposed Project would exceed the significance threshold of 3,000 $MTCO_2e$ per year in each of the analysis scenarios. Therefore, Mitigation Measures AQ-1, AQ-2, AQ-5 through AQ-17,

and AQ-19 and Mitigation Measures GHG-1 through GHG-5 have been included to reduce GHG emissions from both construction and operation activities to the maximum extent feasible.

Scenario A With Overlay. The estimated Project-related GHG emissions with implementation of these mitigation measures are summarized in Table 5.8-6 of the Draft EIR for Scenario A with Overlay, As shown, construction and operation of Phase 1 would generate a net total of approximately 38,167.70 $MTCO_2e$ per year, Phase 2 would generate a total of approximately 44,392.99 $MTCO_2e$ per year, and Specific Plan Buildout would generate 79,114.37 $MTCO_2e$ per year, which would exceed the significance threshold of 3,000 $MTCO_2e$ per year. Therefore, despite implementation of mitigation measures, construction and operation of the proposed Project in Scenario A with the Overlay would remain ***significant and unavoidable***.

Scenario A Without Overlay. The estimated Project-related GHG emissions with implementation of these mitigation measures are summarized in Table 5.8-7 of the Draft EIR for Scenario A without Overlay. As shown, construction and operation of Phase 1 would generate a net total of approximately 38,167.70 $MTCO_2e$ per year, Phase 2 would generate a total of approximately 40,574.60 $MTCO_2e$ per year, and Specific Plan buildout would generate 75,295.97 $MTCO_2e$ per year, which would exceed the significance threshold of 3,000 $MTCO_2e$ per year. Therefore, despite implementation of mitigation measures, construction and operation of the proposed Project in Scenario A with the Overlay would remain ***significant and unavoidable***.

Scenario B With Overlay. The estimated Project-related GHG emissions with implementation of mitigation measures are summarized in Table 5.8-8 of the Draft EIR for Scenario B with Overlay. As shown, construction and operation of Phase 1 would generate a net total of approximately 43,863.05 $MTCO_2e$ per year, Phase 2 would generate a total of approximately 65,611.68 $MTCO_2e$ per year, and Specific Plan buildout would generate 105,503.05 $MTCO_2e$ per year, which would exceed the significance threshold of 3,000 $MTCO_2e$ per year. Therefore, despite implementation of mitigation measures, construction and operation of the proposed Project in Scenario A with the Overlay would remain ***significant and unavoidable***.

Scenario B Without Overlay. The estimated Project-related GHG emissions with implementation of mitigation measures are summarized in Tables 5.8-6 of the Draft EIR for Scenario A with Overlay. As shown, construction and operation of Phase 1 would generate a net total of approximately 43,863.05 $MTCO_2e$ per year, Phase 2 would generate a total of approximately 59,944.09 $MTCO_2e$ per year, and Specific Plan buildout would generate 99,835.45 $MTCO_2e$ per year, which would exceed the significance threshold of 3,000 $MTCO_2e$ per year. Therefore, despite implementation of mitigation measures, construction and operation of the proposed Project in Scenario A with the Overlay would remain ***significant and unavoidable***.

As detailed above, the proposed Project would exceed the significance threshold of 3,000 $MTCO_2e$ per year in each of the scenarios after implementation of Mitigation Measures AQ-1, AQ-2, AQ-5 through AQ-17, and AQ-19 and Mitigation Measures GHG-1 through GHG-5. The majority of the GHG emissions (80% for Scenario A and 85% for Scenario B) are associated with mobile sources. Emissions of motor vehicles are controlled by State and Federal standards, and the City and Project Applicant has no control over these emissions. Thus, impacts related to GHG emissions would be ***significant and unavoidable***.

Impact GHG-2 Finding: The Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (Draft EIR at p. 5.8-27). Impacts would be significant and unavoidable.

Facts in Support of Finding: The Project would incorporate energy-efficient and energy-conserving design features, comply with applicable CALGreen Code and Title 24 requirements in place at the time of permitting, and include sustainable elements such as sidewalks, pedestrian walkways, bike racks, transportation demand management measures (Mitigation Measure AQ-11), and LEED Silver certification (Mitigation Measure GHG-4). These measures are consistent with the policies and goals of the City of Perris

Climate Action Plan (CAP), which identifies local actions for energy reduction, alternative transportation, and solid waste diversion. Accordingly, the Project would not conflict with the CAP.

The Project would also comply with a range of State regulations intended to reduce GHG emissions, including the Pavley emissions standards and Low Carbon Fuel Standard, medium/heavy-duty vehicle regulations, tractor-trailer greenhouse gas regulations, Title 24 building energy efficiency requirements, the Renewable Portfolio Standard, and the Million Solar Roofs Program. In addition, the Project would implement water conservation and solid waste diversion measures consistent with State requirements and Mitigation Measure GHG-1. These measures collectively support implementation of AB 32 and SB 32 in the areas of building energy, solid waste, wastewater, and water conveyance.

However, the Project would generate substantial GHG emissions associated with vehicle and truck trips that cannot be fully reduced by on-site measures. As a result, the Project would not achieve consistency with the vehicle miles traveled reductions identified in the CARB 2022 Scoping Plan and would result in an exceedance of applicable GHG thresholds. As demonstrated in Table 5.8-10 of the Draft EIR, the Project is consistent with the remaining Scoping Plan Actions. Therefore, while the Project would implement measures consistent with AB 32, SB 32, and several components of the CARB 2022 Scoping Plan, it would nevertheless interfere with the State's ability to achieve the long-term targets of SB 32, Executive Orders B-30-15 and S-3-05, and AB 1279's statewide carbon neutrality goal by 2045.

Overall, while the Project would comply with Title 24, CALGreen, the Perris CAP, and relevant General Plan goals and policies, the volume of GHG emissions generated after implementation of mitigation measures would remain considerably above the South Coast AQMD threshold of significance. Therefore, the Project would result in a conflict with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gases, and the impact would be ***significant and unavoidable***.

Greenhouse Gas Emissions Cumulative Finding: The Project would not result in cumulative impacts related to GHG emissions (Draft EIR at p. 5.8-33). Impacts would be significant and unavoidable.

Facts in Support of Finding: The analysis of GHG emission impacts under CEQA contained in this Draft EIR effectively constitutes an analysis of the Project's contribution to the cumulative impact of GHG emissions. The City's evaluation of impacts uses the South Coast AQMD's 3,000 $MTCO_2e$/year threshold of significance, which is conservative since it is being applied to all of the GHG emissions generated by the Project. As detailed in Tables 5.8-6 through 5.8-9 of the Draft EIR, the estimated GHG emissions from development and operation of the Project would exceed the South Coast AQMD's threshold after implementation of mitigation measures. As detailed previously, the majority (80-85%) of the GHG emissions generated by the Project are associated mobile sources that are controlled by State and Federal standards, and the City and Project Applicant has no control over these emissions. Therefore, Project emissions would exceed thresholds after implementation of regulations and mitigation, and the contribution of the Project to significant cumulative GHG impacts would be cumulatively considerable, and ***cumulative impacts would be significant***.

Mitigation Measures

Proposed Project Mitigation Measures

Mitigation Measures AQ-1, AQ-2, AQ-5 through AQ-17, and AQ-19. As listed previously in Section VI(A), Air Quality.

Mitigation Measure GHG-1: The Project plans and specifications shall require that, prior to receipt of occupancy permits, separate recycling bins shall be provided within each commercial/industrial building and large external recycling collection bins shall be provided at central locations in the commercial and industrial land uses for collection truck pickup. In addition, the Project shall provide a commercial recycling/ composting program that provides a minimum 50 percent diversion of waste for the commercial land uses. In addition,

the Project shall provide an industrial recycling program that provides a minimum 60 percent diversion of waste for the industrial land uses.

Mitigation Measure GHG-2: The Project landscape plans and specifications shall require that drought tolerant low-water landscaping and trees be installed throughout the Project site and use recycled (purple pipe) irrigation water with drip irrigation and weather based smart irrigation controllers.

Mitigation Measure GHG-3: The Project plans and specifications shall require that the Project shall implement a Water Conservation Strategy and demonstrate a minimum 20 percent reduction in indoor and outdoor water usage when compared to baseline water demand (total expected water demand without implementation of the Water Conservation Strategy). Prior to the issuance of building permits for the Project, the Project applicant shall provide building plans that could include the following water conservation measures:

- Install low-water use appliances and fixtures
- Restrict the use of water for cleaning outdoor surfaces and prohibit systems that apply water to non-vegetated surfaces
- Implement water-sensitive urban design practices in new construction
- Install rainwater collection systems

Mitigation Measure GHG-4: The Project plans and specifications shall require that all development within the MBU areas shall achieve certification of compliance or demonstrate equivalency with LEED Silver building standards. Prior to the issuance of building permits, the Project Applicant or successor in interest shall provide documentation to the City of Perris demonstrating that each development is designed to achieve energy efficient buildings equivalent to LEED Silver building standards with the following design criteria options:

- Five percent of all parking spaces shall have Level 2 or Level 3 charging capacity.
- Ten percent of all parking spaces shall have EV-ready conduit.
- Building envelops insulation of conditioned space within all commercial and industrial buildings shall be R15 or greater for walls and R30 or greater for attics/roofs.
- Windows of commercial and industrial buildings shall have an insulation factor of 0.28 or less U-factor and 0.22 or less SHGC.
- All roofing material for commercial buildings shall be CRRC Rated 0.15 aged solar reflectance or greater and 0.75 thermal emittance.
- All heating/cooling ducting within the commercial and industrial buildings shall be insulated with R6 or greater insulation.
- All heating and cooling equipment shall be ERR 14/78 percent AFUE, or 7.7 HSPF levels of efficiency or greater.
- All water heaters in the commercial and industrial buildings shall be high efficiency electric water heaters with a minimum 0 .72 Energy Factor or greater.
- Lighting within the commercial and industrial buildings shall be high efficiency LED lighting with a minimum of 40 lumens/watt for 15 watt or less fixtures, 50 lumens/watt for 15–40-watt fixtures, and 60 lumens/watt for fixtures greater than 40 watts.
- All appliances within the commercial and industrial land uses shall be energy star rated appliances.
- All water fixtures shall be water efficient (toilets/urinals [1.5 GPM or less], showerheads [2.0 GPM or less], and faucets [1.28 GMM or less]).

Mitigation Measure GHG-5: The Project Applicant/Developer shall install all necessary infrastructure (i.e., wiring, reinforced roofs) to allow solar photovoltaic systems on the project site to be installed in the future, with a specified electrical generation capacity in order to meet California Green Building Code Standards. The entire roof of the office section of each industrial building shall be designed to support solar installations;

and, once the building tenant has been identified, solar panels shall be installed in order to generate enough energy to meet 100% of the building office's energy needs.

C. Noise

Impact NOI-1 Finding: The Project would not generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies (Draft EIR at p. 5.12-21). Impacts would be significant and unavoidable.

Facts in Support of Finding:

Construction

Noise generated by construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. Construction is expected to occur in the following stages: site preparation, grading, building construction, paving, architectural coating. The Project's construction activities would occur pursuant to the Perris Municipal Code Section 7.34.060. Thus, the construction activities would be in compliance with the City's construction-related noise standards.

Phase 1 Development. As shown on Table 5.12-7 of the Draft EIR, construction noise from Phase 1 would range from 54.2 to 65.5 dBA Lmax at the nearby sensitive receiver locations, which would not exceed the City's 80 dba Lmax daytime construction noise level threshold. Therefore, impacts related to construction noise from Phase 1 would be less than significant. Furthermore, as indicated in Table 5.12-8 of the Draft EIR, Phase 1 would result in construction related increases to ambient noise ranging from 0.5 to 4.6 dBA Leq at the nearest receiver locations, which would not exceed the 12 dBA threshold of significance. During nighttime concrete pours, construction related increases to nighttime ambient noise would range from 0.3 to 10.1 dBA Leq. Therefore, impacts related to construction noise from Phase 1 would be less than significant.

Phase 2 Buildout – With Overlay. As shown on Table 5.12-9 of the Draft EIR, construction noise from Phase 2 buildout with the Overlay at the nearby sensitive receiver locations would range from 58.3 to 64.7 dBA Lmax, which would not exceed the City's 80 dba Lmax daytime construction noise level threshold. Therefore, impacts related to construction noise from Phase 2 with the Overlay would be less than significant. Table 5.12-10 of the Draft EIR shows that construction of Phase 2 with the Overlay would result in increases to ambient noise ranging from 0.3 to 6.3 dBA Leq at the nearest receiver locations, which would not exceed 12 dBA. Therefore, impacts related to construction noise from Phase 2 with the Overlay would be less than significant.

Phase 2 Buildout – Without Overlay. As shown on Table 5.12-11 of the Draft EIR, construction noise from Phase 2 without the Overlay at the nearby sensitive receiver locations would range from 58.3 to 65.8 dBA Lmax, which would not exceed the City's 80 dba Lmax daytime construction noise level threshold. Therefore, impacts related to construction noise from Phase 2 without the Overlay would be less than significant. In addition, Table 5.12-12 of the Draft EIR shows that construction of Phase 2 without the Overlay would result in increases to ambient noise ranging from 0.3 to 11.0 dBA Leq at the nearest receiver locations, which would not exceed 12 dBA. Therefore, impacts related to construction noise from Phase 2 without the Overlay would be less than significant.

Nighttime Concrete Pour. Concrete pouring activities could take place outside the permitted time allowed in the City of Perris Municipal Code Section 7.34.060 of between the hours of 7:00 a.m. to 7:00 p.m. on any day except Sundays and legal holidays (with the exception of Columbus Day and Washington's birthday), the Project Applicant would be required to obtain authorization for nighttime work from the City of Perris. As shown on Table 5.12-13 of the Draft EIR, concrete pouring activities would range from 50.9 to 55.9 dBA Lmax at the nearby receiver locations, which would be less than the City's 60 dBA Lmax residential nighttime

noise level standard. Therefore, potential impacts from nighttime concrete pouring activities onto nearby receptors would be less than significant.

Off-Site Infrastructure Construction. Table 5.12-14 of the Draft EIR shows that off-site construction noise levels at distances ranging from 25 to 200 feet would range from 71.2 to 78.4 dBA Lmax, which would not exceed the 80 dBA Lmax daytime construction noise level standard. Therefore, impacts would be less than significant.

Off-Site Traffic Noise

Phase 1 Development. As shown in Table 5.12-15 of the Draft EIR, traffic noise in 2026 with operation of Phase 1 would range from 64.3 to 75.3 dBA CNEL, which would result in a noise increase of 0.1 to 8.0 dBA CNEL. The study area roadway segment of Barrett Avenue between Placentia Avenue and Orange Avenue (Segment #4) is adjacent to residential uses and would experience a traffic noise increase of 5.8 dBA, which exceeds the threshold of 3 dBA.

Phase 2 Buildout. As shown in Table 5.12-16 of the Draft EIR, traffic noise in 2030 with operation of Phase 2 would range from 67.1 to 77.4 dBA CNEL, which would result in a noise increase of 0.1 to 9.9 dBA CNEL. The study area roadway segment of Barrett Avenue between Placentia Avenue and Orange Avenue (Segment #4) is adjacent to residential uses and would experience a traffic noise increase of 6.4 dBA, which exceeds the threshold of 3 dBA.

General Plan Buildout. As shown in Table 5.12-17, traffic noise in 2045 with operation of both Phase 1 and Phase 2 (40,321 trips per day) would range from 67.1 to 77.4 dBA CNEL, which would result in a noise increase of 0.1 to 8.7 dBA CNEL. The study area roadway segment of Barrett Avenue between Placentia Avenue and Orange Avenue (Segment #4) is adjacent to residential uses and would experience a traffic noise increase of 6.3 dBA, which exceeds the threshold of 3 dBA.

Roadway Noise Mitigation Evaluation. Due to the exceedance of traffic noise increase thresholds, potential mitigation measures were evaluated to determine their effectiveness in reducing impacts. Mitigation measures analyzed included the use of rubberized asphalt and noise barriers. Rubberized asphalt could reduce tire/pavement noise but would not address truck engine and exhaust stack noise. Noise barriers would require heights exceeding what is allowed by the Harvest Landing Specific Plan and the Perris Municipal Code and cannot be implemented off-site without property owner approval. As a result, off-site noise barriers and the use of rubberized asphalt are not considered feasible, and impacts related to truck traffic noise level increases would be ***significant and unavoidable***.

Operational Noise Standard Compliance

To present the potential worst-case noise conditions, the EIR analysis assumes the proposed commercial, light industrial, and warehouse buildings would be operational 24 hours per day, seven days per week. Consistent with similar uses, the business operations of the proposed Project would primarily be conducted within the enclosed buildings, except for traffic movement, parking, as well as loading and unloading of trucks at designated loading bays. The on-site noise sources are expected to include loading dock activity, truck movements, roof-top air conditioning units, parking lot vehicle movements, fire pump, trash enclosure activity, drive thru speakerphones, and gas station activity. As described previously, the Specific Plan area is located within the general vicinity of existing residences and a school. The Noise Impact Analysis calculated the operational source noise levels that would be generated by the proposed Project and the noise increases that would be experienced at the closest sensitive receiver locations.

Phase 1 Development. Table 5.12-18 of the Draft EIR shows that the daytime hourly noise levels at the off-site receiver locations are expected to range from 50.0 to 54.9 dBA Lmax, which would not exceed the City's daytime residential standard of 80 dBA Lmax at residences or schools. Therefore, daytime operational noise impacts from Phase 1 would be less than significant. Table 5.12-19 of the Draft EIR shows that the

nighttime hourly noise levels at the off-site receiver locations are expected to range from 49.8 to 54.7 dBA Lmax, below the threshold of 60 dBA Lmax. Therefore, nighttime operational noise impacts from Phase 1 would be less than significant.

Phase 2 Buildout – With Overlay. Table 5.12-20 of the Draft EIR shows that the daytime hourly noise levels at the off-site receiver locations are expected to range from 50.6 to 57.3 dBA Lmax, which would not exceed the City's daytime residential standard of 80 dBA Lmax at residences or schools. Therefore, daytime operational noise impacts from Phase 2 with Overlay would be less than significant. Table 5.12-21 of the Draft EIR shows that the nighttime hourly noise levels at the off-site receiver locations are expected to range from 50.4 to 57.2 dBA Lmax, which would be below the threshold of 60 dBA Lmax. Therefore, nighttime operational noise impacts from Phase 2 with Overlay would be less than significant.

Phase 2 Buildout – Without Overlay. Table 5.12-22 of the Draft EIR shows that the daytime hourly noise levels at the off-site receiver locations are expected to range from 50.6 to 62.0 dBA Lmax, which would not exceed the City's daytime residential standard of 80 dBA Lmax at residences or schools. Therefore, daytime operational noise impacts from Phase 2 without the Overlay would be less than significant. Table 5.12-23 of the Draft EIR shows that the nighttime hourly noise levels at the off-site nighttime noise sensitive receiver locations are expected to range from 50.4 to 57.3 dBA Lmax. The nighttime noise would be 61.9 dBA Lmax at Val Verde Elementary School, which is not a nighttime noise sensitive use. Therefore, nighttime operational noise impacts from Phase 2 without the Overlay would be less than significant.

Operational CNEL Noise Compliance

Consistent with the City of Perris General Plan Noise Element, Project operational noise levels at the nearest sensitive receiver locations cannot exceed 60 dBA CNEL. The CNEL metric is typically used to describe 24-hour transportation-related noise levels; however, the City of Perris General Plan Noise Element requires new industrial facilities and large commercial facilities to demonstrate compliance with noise-sensitive land uses within 160 feet. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time-of-day corrections require the addition of 5 decibels to dBA Leq sound levels in the evening from 7:00 p.m. to 10:00 p.m., and the addition of 10 decibels to dBA Leq sound levels at night between 10:00 p.m. and 7:00 a.m. These additions are made to account for the noise sensitive time periods during the evening and night hours when noise can become more intrusive, particularly for noise sensitive residential land use. CNEL does not represent the actual sound level heard at any time but rather represents the total sound exposure.

Phase 1 Operational CNEL Noise. Table 5.12-24 of the Draft EIR indicates that the 24-hour noise levels associated with operation of Phase 1 at the nearest receiver locations are expected to range from 48.7 to 56.7 dBA CNEL, which would not exceed the City of Perris 60 dBA CNEL exterior noise level standards at the nearest residences.

Phase 2 With Overlay Operational CNEL Noise. Table 5.12-25 of the Draft EIR indicates that the 24-hour noise levels associated with operation of Phase 2 with Overlay at the nearest receiver locations are expected to range from 50.9 to 56.8 dBA CNEL, which would not exceed the City of Perris 60 dBA CNEL exterior noise level standards at the nearest residences.

Phase 2 Without Overlay Operational CNEL Noise. Table 5.12-26 of the Draft EIR indicates that the 24-hour noise levels associated with operation of Phase 2 without the Overlay at the nearest receiver locations are expected to range from 50.9 to 56.8 dBA CNEL, which would not exceed the City of Perris 60 dBA CNEL exterior noise level standards at the nearest residences.

Operational Noise Level Increase

Phase 1 Noise Increase. As indicated on Table 5.12-27, with operation of Phase 1, the daytime increase in noise would range from 0.0 to 1.0 dBA Leq and Table 5.12-28 shows that the nighttime increase in noise

would range from 0.1 to 0.9 dBA Leq, which would not generate a significant daytime or nighttime operational noise level increase at the sensitive receiver locations. Therefore, impacts would be less than significant.

Phase 2 – With Overlay Noise Increase. As shown in Table 5.12-29 of the Draft EIR, with operation of Phase 2 with Overlay, the daytime increase in noise would range from 0.0 to 0.8 dBA Leq and Table 5.12-29 shows that the nighttime increase in noise would range from 0.1 to 1.5 dBA Leq, which would not generate a significant daytime or nighttime operational noise level increase at the sensitive receiver locations. Therefore, impacts would be less than significant.

Phase 2 – Without Overlay Noise Increase. As shown in Table 5.12-31, with operation of Phase 2 without the Overlay, the daytime increase in noise would range from 0.0 to 4.0 dBA Leq and Table 5.12-32 shows that the nighttime increase in noise would range from 0.1 to 1.5 dBA Leq, which would not generate a significant daytime or nighttime operational noise level increase at the sensitive receiver locations. Therefore, impacts would be less than significant.

Noise Cumulative Finding: The Project would result in cumulative impacts related to noise (Draft EIR at p. 5.12-43). Impacts would be significant and unavoidable.

Facts in Support of Finding: Cumulative noise assessment considers development of the Project in combination with ambient growth and other development projects within the vicinity of the Project area, which are listed in Draft EIR Table 5-1. As noise is a localized phenomenon and drastically reduces in magnitude as distance from the source increases, only projects and ambient growth in the nearby area could combine with the Project to result in cumulative noise impacts.

Construction Noise

Development of the proposed Project in combination with the related projects would result in an increase in construction-related and traffic-related noise. However, Perris Municipal Code Section 7.34.060 requires construction activities to not occur between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or anytime on Sunday or a federal holiday. Also, construction noise and vibration are localized in nature and decrease substantially with distance. Consequently, in order to achieve a substantial cumulative increase in construction noise and vibration levels, more than one source emitting high levels of construction noise would need to be in close proximity to the proposed Project construction. As shown on Figure 5-1 of the Draft EIR, there are several cumulative projects that are adjacent to or within hearing distance of the Project site. The closest cumulative projects include the following:

- P19: Orbis Indus Truck Yard
- P21: Target Store
- P22: Commercial Shopping Plaza
- P23: Habit Restaurant
- P24: Pollo Campero Restaurant
- P30: Tommy's Carwash

Construction of these nearby projects could occur during construction of the proposed Project. However, cumulative projects would also be required to comply with the Perris Municipal Code regarding construction noise impacts and would implement measures as required through City construction permitting to protect sensitive receptors from construction noise impacts, which would limit the potential of the noise to cumulatively combine with noise from nearby projects. Construction noise is not additive; meaning if more than one construction project occurred at the same time, a higher noise volume would not occur; however, the construction noise would occur over both project locations. Because the proposed Project construction noise would not exceed standards, simultaneous construction would not cause an exceedance that could be

cumulatively impactful. Thus, construction noise impacts would be less than cumulatively considerable and less than significant.

Operational Traffic Noise

Cumulative traffic source noise impacts would occur primarily as a result of increased traffic on local roadways due to the proposed Project and related projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the proposed Project in the opening year cumulative traffic volumes on the roadways in the Project vicinity. As shown in Table 5.12-35 of the DEIR, in the General Plan buildout (2045) condition, the cumulative increase in roadway noise volumes would range from 1.6 to 10.9 dBA CNEL. As shown, the study area roadway segment of Barrett Avenue between Placentia Avenue and Orange Avenue (Segment #4) is adjacent to residential uses and would experience a traffic noise increase of 7.4 dBA, which exceeds the threshold of 3 dBA. This would be a cumulatively considerable increase in traffic noise. As described previously, there is no feasible mitigation to reduce roadway noise levels below thresholds. Therefore, noise increases from truck traffic would be cumulatively considerable and would remain ***significant and unavoidable*** after implementation of mitigation.

On-Site Operational Noise

As detailed previously, impacts associated with on-site noise sources would be less than significant and no mitigation is required. Therefore, the Project would not have a cumulatively considerable contribution that could result in potential exceedances of noise standards. Other projects would also be required to evaluate on-site noise sources and, if necessary, mitigate for such impacts. Stationary noise is a localized phenomena, and there is very limited potential for cumulative noise impacts to occur. Each related project in the Specific Plan vicinity would require noise assessments and compliance with noise-related municipal codes, as part of permitting requirements that would address potential noise impacts and identify necessary attenuation measures, where appropriate. As such, the Project, in conjunction with other projects, would not have a cumulatively considerable impact related to on-site operational noise. Cumulative on-site operational noise impacts from the Project would be less than significant.

Construction Vibration

Groundborne vibration generated at the Specific Plan area during construction would not be in exceedance of the 0.3 inches per sec PPV threshold. Although construction of other projects may occur at the same time as the proposed Project, cumulatively significant construction vibration would only have the potential to occur when construction activities generating high vibration levels occur in close proximity to one another in a way that concentrates the vibration. Additionally, because heavy construction equipment moves around a project site and would only occur for limited durations, average vibration levels at the nearest structures would diminish with increasing distance between the structures and construction activities. Both the proposed Project and related projects would be required to comply with the limitations on allowable hours of construction that limit potential construction vibration impacts. Due the limited vibration generated by Project construction that would be in temporary locations throughout the site, the Project's incremental effects associated with the generation of excessive groundborne vibration or groundborne noise levels would be less than cumulatively considerable.

Operational Vibration

As detailed previously, operational vibration from the Project would be limited to trucks on nearby roadways and on site that would be travelling at low speeds on smooth surfaces and would generate vibration below the perceptibility threshold of 0.3 PPV in/sec. Because the vibration would be below perceptibility and would further diminish with distance, the Project vibration would not combine to become cumulatively considerable, and cumulative operational vibration would be less than significant.

Mitigation Measures

None.

D. Transportation

Impact TR-2 Finding: The Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (B) regarding vehicle miles traveled (Draft EIR at p. 5.16-23). Impacts would be significant and unavoidable.

Facts in Support of Finding: As discussed in the VMT Analysis, the Project does not qualify for a VMT screening pursuant to the City's guidelines (Appendix S of the Draft IER).

Phase 1 Development – Roadway Improvement

As described in Section 3.0, *Project Description*, the Project would vacate Indian Avenue and would extend Barrett Avenue south of Orange Avenue. The proposed segment of Barrett Avenue to be extended is 3,000 feet (approximately 0.57 mile). Based on Appendix D of the City of Perris's VMT Scoping Form for Transportation Projects, the addition of new through lanes less than one mile in length with multi-modal facilities would be presumed to have a less-than-significant impact. Therefore, as the extension of Barrett Avenue would be less than one mile in length, the roadway extension would be less than significant.

Phase 1 Development – Business Park

As shown in Table 5.16-2 of the Draft EIR, the Business Park portion of Phase 1 would result in approximately 4,563 daily trips, 477 AM peak hour trips, and 480 PM peak hour trips. As shown in Table 5.16-5 of the Draft EIR, the VMT/SP for the Business Park portion of Phase 1 would be 6.85 percent below the threshold under Project Baseline (2024) conditions and 4.22 percent below the threshold under General Plan buildout (2045) conditions. Therefore, the Phase 1 Business Park portion of the Project would be less than significant.

Phase 1 Development – Commercial

As shown in Table 5.16-2 of the Draft EIR, the Commercial component of Phase 1 would result in approximately 22,254 daily trips, 938 AM peak hour trips, and 1,263 PM peak hour trips. As shown in Table 5.16-6 of the Draft EIR, 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. Therefore, the commercial component of Phase 1 would result in a potentially significant VMT impact.

Phase 2 – With Overlay

As shown in Table 5.16-2 of the Draft EIR, the Business Park portion of Phase 2, including the overlay area, would result in approximately 13,505 daily trips, 1,363 AM peak hour trips, and 1,363 PM peak hour trips. As shown in Table 5.16-7 of the Draft EIR, the VMT/SP for the Phase 2 buildout would be 9.92 percent below the threshold under Project Baseline (2024) conditions and 10.32 percent below the threshold under General Plan buildout (2045) conditions. Therefore, the Phase 1 Business Park portion of the Project would be less than significant.

Specific Plan Buildout

The Project's VMT analysis results for buildout of the entirety of the Specific Plan (including all TAZs) from RIVCOM are shown in Table 5.16-8 of the Draft EIR. As shown, 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. Therefore, full buildout of the proposed Specific Plan Amendment would result in a potentially significant VMT impact.

The Project would implement multiple design features and mitigation measures to reduce VMT, including CAPCOA Measure T-2 (Increase Job Density) by concentrating jobs within the City and shortening communities; CAPCOA Measure T-18 (Provide Pedestrian Network Improvement) as PDF TR-1 by installing sidewalks; CAPCOA Measure T-19-A (Construct or Improve Bike Facility) and Measure T-20 (Expand Bikeway Network) as PDF TR-2; and Measure T-27 (Implement Transit-Supportive Roadway Treatments) as PDF TR-3 by installing new crosswalks along Project roadways and constructing two bus stops along Perris Boulevard. Furthermore, the Project would implement Mitigation Measure TR-1, which would require a voluntary commute trip reduction program for facilities with fewer than 250 employees, and Mitigation Measure AQ-11, which would require a mandatory commute trip reduction program/transportation management association.

As shown in Table 5.16-9 of the Draft EIR, 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 in General Plan buildout (2045) conditions. As shown in Table 5.16-10 of the Draft EIR, 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***.

Project Design Features

Proposed Project Design Features

Sidewalks. The Project includes sidewalks along Indian Avenue, Orange Avenue, Frontage Road, Perris Boulevard, Barrett Avenue, Harvest Landing Way, and Private Drive A, as specified in Section 3.0, *Project Description*.

Bicycle Facilities. The Project includes bicycle lanes along Indian Avenue, Orange Avenue, and Barrett Avenue, as specified in Section 3.0, *Project Description*.

Bus Facilities. The Project includes the construction of a bus stop along the Commercial component of the Specific Plan along Perris Boulevard. Bus stop plans shall be submitted to the RTA and City Planning Division for review and approval.

Mitigation Measures

Proposed Project Mitigation Measures

Mitigation Measure TR-1: Voluntary Commute Trip Reduction Program. For tenants with less than 250 employees, the tenant shall implement a Voluntary Commute Trip Reduction Program, which shall encourage alternative modes of transportation, such as carpooling. The Voluntary Commute Trip Reduction Program would encourage employers to track and report employee commute data and provide resources to support participation in commute reduction efforts, without mandatory compliance or penalties. The Voluntary Commute Trip Reduction Program would be fulfilled through implementation of one or more of the following measures:

- **Implement Commute Trip Reduction Marketing.** This measure would ensure that employees are informed about available transportation options, thereby maximizing participation in the Voluntary Commute Trip Reduction programs and contributing to the reduction of traffic congestion.
- **Provide Ridership Program.** This measure would provide transit passes or other incentives to employees, encouraging the use of public transportation. Given the scale of employment in the Business Park phases, this program is expected to reduce vehicle use and lower VMT.
- **Implement Subsidized or Discounted Transit Program.** This measure involves offering subsidized or discounted transit passes to employees. By reducing the cost of public transportation, it aims to increase its use among employees, thereby decreasing single-occupancy vehicle trips and contributing to a reduction in vehicle miles traveled (VMT).
- **Provide End-of-Trip Bicycle Facilities.** End-of-trip facilities, including bike racks, lockers, and showers, shall be provided to support employees who choose to bike to work. These facilities are necessary to facilitate and increase bicycle commuting.
- **Provide Employer-Sponsored Vanpool.** This measure would support a vanpool program, reducing single-occupancy vehicle use. The vanpool program is particularly applicable to the large workforce anticipated in the Business Park phases.

Mitigation Measure AQ-11. As listed previously.

SECTION VII

GROWTH-INDUCING IMPACTS AND COMMITMENT OF RESOURCES

Section 15126.2(d) of the State CEQA Guidelines requires the EIR address the growth-inducing impact of the Project. Draft EIR Section 6, *Other CEQA Considerations*, evaluates the potential for the proposed Project to affect the environment from employment or population growth, or the construction of additional housing, either directly or indirectly.

Impact Growth-1 Finding: The Project would not directly or indirectly foster economic or population growth, or the construction of additional housing, in the surrounding environment. (Draft EIR p. 6-3). Impacts would be less than significant.

Facts in Support of Finding: While the Project would contribute to employment growth through the proposed development within the Project site, the Project proposes an 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.

The proposed Project would cause indirect economic growth as it would generate revenue for the City through taxes generated by the development. Additionally, employees of the Project site would purchase goods and services within the region, but any secondary increase in employment growth associated with meeting these incremental demands would be marginal. 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 retail services. As such, it is highly unlikely that additional commercial or retail services would be required to meet Project demands.

Additionally, buildout of the Project would create approximately 6,427 jobs which will likely be filled by residents of Perris, 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. Lastly, 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 (Draft EIR p. 6-4). Thus, the workforce required for the Project is readily available in the City, and it is anticipated that new jobs generated from the Project would be filled by the people within the City of Perris and would not result in the influx of new labor or the need for additional housing.

Impact Growth-2 Finding: The Project would not remove obstacles to growth through the construction or extension of major infrastructure facilities that do not presently exist in the Project area or would add substantial capacity that could accommodate additional unplanned growth (Draft EIR at p. 6-4). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project involves expanding existing infrastructure to support the full development of the Specific Plan area. The Project proposes installation of new on-site potable water lines, sewer lines, and stormwater drainage facilities that would connect to surrounding, existing infrastructure in surrounding roadways to accommodate the demands of the Project. As discussed in Section 5.18 of the Draft EIR, *Utilities and Service Systems*, the proposed Project falls within the projected demand for the Specific Plan area identified in the EMWD 2020 UWMP, and its wastewater demand would be accommodated by the Perris Valley Regional Water Reclamation Facility's current and ultimate daily excess treatment capacity. The proposed infrastructure improvements have been previously planned for and/or designed to serve only the demands of the Project. Therefore, the Project would not result in significant growth inducing impacts.

Impact Growth-3 Finding: The Project would not require the construction of new or expanded facilities that could cause significant environmental effects (Draft EIR at p. 6-4). Impacts would be less than significant.

Facts in Support of Finding: The proposed Project would slightly increase the demand for fire protection, emergency response, and sheriff protection. However, 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 buildout projections, the proposed Project would not create a demand for services beyond the capacity of existing facilities. 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 not have significant growth inducing consequences that would require the need to expand public services to maintain desired levels of service.

Impact Growth-4 Finding: The Project would not encourage or facilitate other activities that could significantly affect the environment individually or cumulatively (Draft EIR at p. 6-5). Impacts would be less than significant.

Facts in Support of Finding: The Project could spur increased development in the surrounding areas however; these areas are already developed or are slated for future development. The existing specific plan provides for urban development of the site, and 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. Therefore, the Project would not individually or cumulatively encourage or facilitate substantial growth.

SECTION VIII

SIGNIFICANT IRREVERSIBLE EFFECTS

Section 15126.2(c) of the CEQA Guidelines requires that an EIR discuss "any significant irreversible environmental changes which would be involved in the proposed action should it be implemented." 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 proposed 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 of the Draft EIR, *Aesthetics)*
    - Increased traffic on area roadways (see Section 5.16 of the Draft EIR, *Transportation*).
    - Emissions of air pollutants associated with Project construction and operation (see Section 5.3 of the Draft EIR, *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 of the Draft EIR, *Energy*).
    - Increased ambient noise associated with an increase in activities and traffic from the Project (see Section 5.12 of the Draft EIR, *Noise*).

- Construction of the proposed Project as described in Section 3.0 of the Draft EIR, *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 of the Draft EIR, *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 the Draft EIR within 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 the Draft EIR. In addition, the Project would not result in irreversible damage that could result from any potential environmental accidents as associated with the Project.

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SECTION IX

ALTERNATIVES

Section 15126.6 of the State CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to the Project, or to the location of the Project, which could feasibly achieve most of its basic objectives, but would avoid or substantially lessen any of the significant effects identified in the EIR analysis. An EIR is not required to consider every conceivable alternative to a proposed project. Rather, an EIR must consider a reasonable range of alternatives that are potentially feasible; an EIR is not required to consider alternatives that are infeasible. In addition, an EIR should evaluate the comparative merits of the alternatives. Therefore, this section sets forth the potential alternatives to the Project analyzed in the EIR and evaluates them in light of the objectives of the Project, as required by CEQA.

Objectives

The Project Objectives are designed to ensure the Project develops a quality industrial development. The Project objectives have been refined throughout the planning and design process for the Project, and are listed below:

- To make efficient use of the underutilized property in the city of Perris by adding to its potential for employment-generating uses.
- To attract new business and employment to the City of Perris and thereby promote economic growth.
- To reduce the need for members of the local workforce to commute outside the Project vicinity to work.
- To develop an underutilized property to host industrial uses as permissible under current land use and zoning code.
- To develop a new project that would utilize a major truck route to limit truck traffic through residential neighborhoods.
- To develop an underutilized property consistent with the current General Plan and zoning that is conveniently located in the I-215 and has access to available infrastructure, including roads and utilities to accommodate the growing need for goods movement within Southern California.

(Draft EIR at p. 8-3)

Alternatives

Key provisions of the State CEQA Guidelines relating to the alternatives analysis (Section 15126.6 et seq.) are summarized below:

- The discussion of alternatives shall focus on alternatives to the Project or its location that 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 objectives or would be more-costly.
- The "No Project" alternative shall be evaluated along with its impact. The "No Project" analysis shall discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the Project is not approved.
- The range of alternatives required in an EIR is governed by a "rule of reason;" therefore, the EIR must evaluate 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.
- 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.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

Rationale for Selecting Potentially Feasible Alternatives

The alternatives must include a no-project alternative and a range of reasonable alternatives to the Project if those reasonable alternatives would attain most of the Project objectives while substantially lessening the potentially significant Project impacts. The range of alternatives discussed in an EIR is governed by a "rule of reason," which the State CEQA Guidelines Section 15126.6(f)(3) defines as:

. . . set[ting] 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 (as described in the State CEQA Guidelines Section 15126.6(f)([1]) are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the Project proponent could reasonably acquire, control, or otherwise have access to an alternative site. An EIR need not consider an alternative whose effects could not be reasonably identified, and whose implementation is remote or speculative.

For purposes of this analysis, the Project alternatives are evaluated to determine the extent to which they attain the basic Project objectives, while significantly lessening the significant effects of the Project.

Alternatives Not Selected for Analysis

Alternate Site Alternative

An alternative site alternative was considered and eliminated from further consideration. CEQA specifies that the key question regarding alternative site consideration is "whether any of the significant effects of the Project would be avoided or substantially lessened by putting the Project at another location." In addition, an alternative site need not be considered when implementation is "remote and speculative," such as when the alternative site is beyond the control of a Project applicant.

An alternate site for the Project was eliminated from further consideration. Based on a review of available sites for sale in the City of Perris and surrounding jurisdictions, there are no other available, undeveloped properties of similar size (358.28 developable acres) that could feasibly be developed with industrial and commercial retail. There are no suitable sites within the control of the Project applicant; however, in the event land could be purchased of suitable size, due to the built-out nature of the City of Perris, development of up to 5,735,535 square feet of MBU uses and 428,507 square feet of commercial uses at a different location would likely require additional demolition of existing structures and require similar, and potentially additional, mitigation. CEQA specifies that the key question regarding alternative site consideration is whether the basic Project objectives would be attained and if any of the significant effects of the Project would be avoided or substantially lessened by having the Project at another location. Given these reasons, it would be infeasible to develop and operate the Project on an alternate site with fewer environmental impacts while meeting Project objectives. Therefore, the Alternative Site Alternative was rejected from further consideration. (Draft EIR p. 8-4)

Finding: The City of Perris rejects the Alternative Site Alternative, on the following ground, which provides sufficient justification for rejection of this alternative: the Project is location specific and a similarly sized project at an alternative site is not available. If the Project were to be relocated it would require demolition and similar, potentially additional, mitigations and would not reduce impacts compared to the proposed Project. Therefore, this alternative is eliminated from further consideration.

Commercial Alternative

A completely commercial alternative was eliminated from further consideration. Based on the ITE trip rates for shopping center, fast food restaurant with drive through, high turnover (sit-down) restaurant, medical office building, supermarket, coffee/donut shop with drive-thru window, and fast casual restaurant, an all-commercial development would result in significant additional trips when compared to the proposed Project's trip generation given commercial trip rates are significantly higher than high-cube and general light industrial trip rates. Therefore, construction and operation of an all-commercial alternative would result in increased air quality emissions, energy consumption, greenhouse gas emissions, and VMT compared to the Project, which would in turn result in increased impacts. As the Commercial Alternative would not reduce any of the Project's significant and unavoidable impacts or meet the Project objectives, the Commercial Alternative was rejected from further consideration (Draft EIR at p. 8-4)

Finding: The City of Perris rejects the Commercial Alternative on the following ground, which provides sufficient justification for rejection of this alternative: the alternative would increase trips when compared to the proposed Project's trip generation, and potentially additional mitigation. It could also result in significant impacts to air quality emissions, energy consumption, greenhouse gas emissions, and VMT and would likely not reduce any of the Project's significant and unavoidable impacts or meet the Project objectives. Therefore, this alternative is eliminated from further consideration.

Alternatives Selected for Further Analysis

Alternative 1: No Project/No Development Alternative. This alternative consists of the Project not being approved, and the Project site would remain in the conditions that existed at the time the Notice of Preparation was published (August 9, 2024). (Draft EIR at p. 8-5)

Alternative 2: No Project/Buildout of the Existing Harvest Landing Specific Plan. This alternative consists of the Project not being approved, and the existing Harvest Landing Specific Plan land use designations being developed. This Alternative would include development of approximately 1,860 residential units, 1,306,582 square feet of MBU development, and approximately 43.6 acres of recreation and open space uses. Areas outside of the existing Specific Plan would maintain their existing General Plan land use designations and zoning designations and would not be developed as part of this Alternative. This Alternative would not require a Specific Plan Amendment, General Plan Amendment, or Zone Change. (Draft EIR at p. 8-5)

Alternative 3: Reduced Project Alternative. This alternative consists of development of the Project site in a manner similar to the Project, but with a reduction in square footage developed. Based on a reasonable reduction in development intensity, this alternative assumes a 50 percent reduction in all building square footages in Phase 1 and no development within the Phase 2 area. Therefore, this alternative would develop the 187.43-acre Phase 1 area with approximately 863,789 square feet of MBU uses and approximately 214,253 square feet of commercial retail uses. The 122.68-acre Phase 2 area would remain undeveloped and vacant. No MBU overlay would be added to Val Verde Elementary School. This alternative would include a reduced amount of parking compared to what is needed by the Project. This alternative would still require a Specific Plan Amendment, General Plan Amendment, and Zone Change, but would not annex any parcels into the Harvest Landing Specific Plan. (Draft EIR at p. 8-5)

Alternative 4: Reduced Phase 1 MBU & Phase 2 Residential Alternative. Based on comments received in response to the Notice of Preparation and during the Draft EIR Scoping Meeting, it was stated that Planning Commissioners and City residents wanted an EIR alternative that included a portion of the Specific Plan Area as residential. This alternative consists of development of the commercial components of Phase 1 in a manner consistent with the proposed Project and reduction of the total industrial square footage in the MBU area. Under this alternative, the Building 1 parcel hub would be increased from 322,079 square feet to 391,725 square feet and Buildings 2 through 7 would not be developed. In addition, the Building 1 parcel hub would be shifted to the southernmost portion of the Specific Plan, directly north of the intersection of Frontage Road and Barrett Avenue. As such, the remainder of the Phase 1 area (69.89 acres) would be permitted for MBU

uses at a maximum floor area ratio of 0.25, which would allow for development of approximately 761,102 square feet of building space. This would result in an overall decrease in MBU square footage by approximately 574,752 square feet in Phase 1 to 1,152,827 square feet at buildout. Under this alternative, warehousing uses would not be permitted within the Specific Plan. In addition, a portion of the Phase 2 area would not be subject to the Specific Plan Amendment so Phase 2 future buildout would include development of Phase 2 west of Indian Avenue with MBU uses and development of the area east of Indian Avenue with approximately 615 dwelling units pursuant to the existing Harvest Landing Specific Plan designations and entitlements. The development standards set forth in the 2011 Harvest Landing Specific Plan and the mitigation measures set forth in the 2008 Harvest Landing Specific Plan EIR would apply to future housing development within the area excluded from the proposed Specific Plan Amendment. Therefore, this alternative would allow for the development of approximately 2,829,125 square feet of MBU uses, 428,507 square feet of commercial retail uses, 615 dwelling units, and a 16.5-acre sports park. As with the Project, the entire 358.28-acre developable portion of the site would be developed. Areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. This alternative would still require a Specific Plan Amendment, General Plan Amendment, and Zone Change. (Draft EIR at p. 8-5)

Findings for Alternatives

Alternative 1: No Project/No Development Alternative

The No Project/No Development Alternative would result in continuation of the existing uses within the Project site and the proposed development would not occur. As a result, this alternative would avoid the need for mitigation measures that are identified in Chapter 5.0 of this Draft EIR, which include measures related to air quality, biological resources, cultural resources, greenhouse gas emissions, paleontological resources, transportation, and tribal cultural resources. This alternative would also avoid the significant and unavoidable impacts to air quality, greenhouse gas emissions, noise, and VMT. This alternative would not result in any of the impacts analyzed in this Draft EIR, as shown in table 8-9 of the Draft EIR, *Impact Comparison of the Proposed Project and Alternatives*.

Implementation of the No Project/No Development Alternative would not meet any of the Project objectives. The alternative would not provide a master plan to provide a mix of commercial and business park uses or economic opportunities and job growth within the City of Perris. This alternative would not provide additional retail and dining opportunities for residents or visitors in the City of Perris. The potential benefits of the proposed Project would also not be realized, including providing jobs on-site that would result in a better jobs-housing balance in Perris, which is currently considered a housing rich area. Overall, this alternative would not develop in underutilized property located in the vicinity of I-215. The No Project/ No Development Alternative comparison to the Project objectives are listed in Table 8-10 of the Draft EIR. (Draft EIR at p. 7-22)

Finding: The City of Perris finds that the No Project/No Development Alternative would not necessitate mitigation measures related to air quality, biological resources, cultural resources, greenhouse gas emissions, paleontological resources, transportation, and tribal cultural resources. However, the potential benefits of the proposed Project would also not be realized, including creating an expanded employment base, providing new employment opportunities, attracting new businesses, providing essential infrastructure, and creating high-quality development. Each of these reasons, separately and independently, is a sufficient basis upon which to reject this alternative.

Alternative 2: No Project/Buildout of Existing Harvest Landing Specific Plan Alternative

The No Project/Buildout of Existing Harvest Landing Specific Plan Alternative would reduce Project square footage; however, the Project would bring more occupants to the Project site. While some impacts would be reduced, many of the impacts under this alternative would increase, including public services, recreation, and utilities and service systems. Further, while this alternative would avoid the Project's significant and

unavoidable traffic noise impact, this alternative would not avoid the Project's air quality, greenhouse gas, or vehicle miles traveled impacts. All mitigation measures would still be applicable to this alternative; however, this alternative would result in lessened impacts to 4 of the 18 environmental topics analyzed in this Draft EIR (as shown in table 8-9 of the Draft EIR).

As shown in Table 8-10 of the Draft EIR, the No Project/Buildout of Existing Harvest Landing Specific Plan Alternative would not meet many of the Project objectives. Under this alternative, the existing 341.1-acre Harvest Landing Specific Plan would be built out with 1,233,401 square feet of MBU development, 73,181 square feet of commercial uses, 1,860 residential units, and 43.6 acres of recreational and open space uses. The alternative would not meet the main objective of the Project which is to amend the Harvest Landing Specific Plan to provide a comprehensive master plan for the Specific Plan area to provide a mix of commercial and business park uses with supporting infrastructure facilities. This alternative would meet the remainder of Project objectives, but to a lesser extent.

Finding: The City of Perris finds that the No Project/Buildout of Existing Harvest Landing Specific Plan Alternative would result in lessened impacts to 4 of the 18 environmental topics. However, this alternative would require the same mitigation measures as the proposed Project and would not meet the Project objectives to the fullest extent as the proposed Project. Further, while this alternative would avoid the Project's significant and unavoidable traffic noise impact, this alternative would not avoid the Project's air quality, greenhouse gas, or vehicle miles traveled impacts. These reasons, separately and independently, is a sufficient basis upon which to reject this alternative.

Alternative 3: Reduced Project Alternative

Under the Reduced Project Alternative, mitigation measures would still be applicable to this alternative and the alternative would not avoid the Project's significant and unavoidable regional operational air quality, greenhouse gas, and VMT impacts. However, this alternative would avoid the Project's regional construction air quality and roadway noise impacts and would result in lessened impacts to 14 of the 18 environmental topics analyzed in this Draft EIR (see Table 8-9).

As shown in Table 8-10 of the Draft EIR, the Reduced Project Alternative would partially meet the majority of Project objectives, but not to the same extent as the proposed Project. The alternative would not meet the main objective of the Project which is to amend the Harvest Landing Specific Plan to provide a comprehensive master plan for the Specific Plan area to provide a mix of commercial and business park uses with supporting infrastructure facilities as the entire Harvest Landing Specific Plan would not be developed. This alternative would meet the remainder of Project objectives, but to a lesser extent. In addition, portions of the Specific Plan area would continue to be underutilized and undeveloped.

Finding: The City of Perris finds that the Reduced Project Alternative would result in lessened impacts to 14 of the 18 environmental topics. However, many of the mitigation measures would still be applicable to this alternative and this alternative would not avoid the Project's significant and unavoidable regional operational air quality, greenhouse gas, and VMT impacts. Additionally, this alternative would not meet the main objective of the Project. These reasons, separately and independently, are a sufficient basis upon which to reject this alternative.

Alternative 4: Phase 1 Reduced MBU & Phase 2 Residential Alternative

The Phased 1 Reduced MBU & Phase 2 Residential Alternative would result in development of the entire 358.28-acre Specific Plan area with approximately 2,829,125 square feet of MBU uses, 428,507 square feet of commercial retail uses, 615 dwelling units, and a 16.5-acre sports park. Under this alternative, the Building 1 parcel hub would be increased from 322,079 square feet to 391,725 square feet and Buildings 2 through 7 would not be developed. In addition, the Building 1 parcel hub would be shifted to the southernmost portion of the Specific Plan, directly north of the intersection of Frontage Road and Barrett Avenue. As such, the remainder of the Phase 1 area (69.89 acres) would be permitted for MBU uses at a

maximum floor area ratio of 0.25, which would allow for development of approximately 761,102 square feet of building space. This would result in an overall decrease in MBU square footage by approximately 574,752 square feet in Phase 1 to 1,152,827 square feet at buildout. Under this alternative, warehousing uses would not be permitted within the Specific Plan. All of the mitigation measures would still be applicable to this alternative and this alternative would not avoid the Project's significant and unavoidable air quality, greenhouse gas, traffic noise, or VMT impacts. However, this alternative would result in lessened impacts to 4 of the 18 environmental topics analyzed in this Draft EIR (see Table 8-9).

As shown in Table 8-10 in the Draft EIR, the Phase 1 Reduced MBU & Phase 2 Residential Alternative would partially meet all of the Project objectives, but not to the same extent as the proposed Project. Further, while this alternative would not amend the existing Harvest Landing Specific Plan in the Phase 2 area east of Indian Avenue, it would provide a comprehensive master plan for the Specific Plan area to provide a mix of commercial, residential, and business park uses with supporting infrastructure facilities.

Finding: The City of Perris finds that the Phase 1 Reduced MBU & Phase 2 Residential Alternative would result in lessened impacts to 4 of the 18 environmental topics. However, all of the mitigation measures would still be applicable to this alternative, and this alternative would not avoid the Project's significant and unavoidable air quality, greenhouse gas, traffic noise, or VMT impacts. Additionally, this alternative would partially meet all of the Project objectives, but not to the same extent as the proposed Project. Further, while this alternative would not amend the existing Harvest Landing Specific Plan in the Phase 2 area east of Indian Avenue, it would provide a comprehensive master plan for the Specific Plan Area to provide a mix of commercial, residential, and business park uses with supporting infrastructure facilities.

Therefore, as the Phase 1 Reduced Warehouse & Phase 2 Residential Alternative would result in lessened impacts to 4 of the 18 environmental topic areas and would partially meet all of the Project objectives, the City of Perris finds that Alternative 4 would be environmentally superior to the proposed Project. Further, the City of Perris finds that the Phase 1 Reduced MBU & Phase 2 Residential Alternative is feasible from an environmental, economic, and social perspective.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The Environmentally Superior Alternative for the Project would be the No Project/No Development Alternative. Pursuant to CEQA Guidelines Section 15126.6(3)(1) an additional alternative need to be selected alongside the No Project/Development Alternative. The second Environmentally Superior Alternative for the Project is the Reduced Project Alternative.

The Reduced Project Alternative would result in lessened impacts to 14 of the 16 environmental topics analyzed in this EIR. This alternative would avoid the Project's significant and unavoidable regional construction air quality impact and traffic noise impact. However, this alternative would be required to implement applicable mitigation measures regarding biological resources, cultural resources, geology and soils, and tribal cultural resources, similar to the Project. Moreover, the Reduced Project Alternative would not meet the Project objectives to the same extent as the Project. (Draft EIR p. 8-36)

CEQA does not require the lead agency (the City of Perris) to choose the environmentally superior alternative. Instead, CEQA requires the City to consider environmentally superior alternatives, weigh those considerations against the environmental impacts of the proposed Project, and make findings that the benefits of those considerations outweigh the harm. Based on the considerations described herein, the City of Perris finds that the No Project/No Development Alternative and Reduced Project Alternative are infeasible based on these environmental, economic, and social factors.

SECTION X

CERTIFICATION OF THE EIR

The City of Perris finds that it has reviewed and considered the Final EIR in evaluating the proposed Project, that the Final EIR is an accurate and objective statement that fully complies with CEQA, State CEQA Guidelines and that the Final EIR reflects the independent judgment of the City.

The City of Perris declares that no new significant information as defined by State CEQA Guidelines, section 15088.5 has been received by the City after circulation of the Draft EIR that would require recirculation.

The City of Perris certifies the EIR based on the entirety of the record of proceedings, including but not limited to the following findings and conclusions.

Findings

The following significant environmental impacts have been identified in the EIR and will require mitigation as set forth in Section XI of this Resolution but cannot be mitigated to a level of insignificance: air quality (Project-level and Cumulative), greenhouse gas emissions (Project-level and Cumulative), noise (Project-level and Cumulative), and transportation (Project-level and Cumulative).

Conclusions

1. Except as to those impacts stated above relating to air quality, greenhouse gas emissions, noise, and transportation, all significant environmental impacts from the implementation of the proposed Project have been identified in the EIR and, with implementation of the mitigation measures identified, will be mitigated to a level of insignificance.
2. Other alternatives to the proposed Project, which could potentially achieve the basic objectives of the proposed Project, have been considered and rejected in favor of Alternative 4: Phase 1 Reduced Warehouse and Phase 2 Residential Alternative.
3. Environmental, economic, social, and other considerations and benefits derived from the proposed Project override and make infeasible Alternatives 1 through 3 or further mitigation measures beyond those incorporated into the proposed Project.

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SECTION XI

MITIGATION MONITORING AND REPORTING PLAN

Pursuant to Public Resources Code section 21081.6, the City of Perris adopts the Mitigation Monitoring and Reporting Plan (MMRP) attached to this Resolution as Exhibit A. In the event of any inconsistencies between the mitigation measures as set forth herein and the Mitigation Monitoring and Reporting Plan, the Mitigation Monitoring and Reporting Plan shall control.

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SECTION XII

STATEMENT OF OVERRIDING CONSIDERATIONS

The City of Perris is the Lead Agency under CEQA for preparation, review, and certification of the EIR for the Harvest Landing Retail Center & Business Park Project. As the Lead Agency, the City is also responsible for determining the potential environmental impacts of the proposed action and which of those impacts are significant, and which can be mitigated through imposition of mitigation measures to avoid or minimize those impacts to a level of less than significant. CEQA then requires the Lead Agency to balance the benefits of a proposed action against its significant unavoidable adverse environmental impacts in determining whether or not to approve the proposed Project. In making this determination the City is guided by CEQA Guidelines Section 15093 which states:

CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposal (sic) project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The Statement of Overriding Considerations shall be supported by substantial evidence in the record.

If an agency makes a Statement of Overriding Considerations, the Statement should be included in the record of the project approval and should be mentioned in the notice of determination. This Statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

In addition, CEQA Section 21081(b) requires that where a public agency finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in an EIR and thereby leave significant unavoidable effects, the public agency must also find that overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects of the project.

Pursuant to CEQA Section 21081(b) and the State CEQA Guidelines Section 15093, the City has balanced the benefits of the proposed Project against the unavoidable adverse impacts associated with the Project and has adopted all feasible mitigation measures with respect to these impacts. The City has also examined alternatives to the proposed Project, none of which meet the Project objectives and are environmentally preferable to the proposed Project for the reasons discussed in the Findings and Facts in Support of Findings.

The City of Perris, as the Lead Agency for this Project, and having reviewed the EIR for the Harvest Landing Retail Center & Business Park Project and reviewed all written materials within the City's public record and heard all oral testimony presented at public hearings, adopts this Statement of Overriding Considerations, which has balanced the benefits of the Project against its significant unavoidable adverse environmental impacts in reaching its decision to approve the Project.

Overriding Benefits Resulting from the Project

The City, after balancing the specific economic, legal, social, technological, and other benefits of the Alternative 4, has determined that the unavoidable adverse environmental impacts identified above may be considered acceptable due to the following specific considerations, which outweigh the unavoidable, adverse environmental impacts of Alternative 4, each of which standing alone is sufficient to support approval of Alternative 4: Phase 1 Reduced Warehouse and Phase 2 Residential Alternative, in accordance

with CEQA Section 21081(b) and CEQA Guideline Section 15093. The specific economic, legal, social, technological, or other benefits of Alternative 4 are as follows:

- **Alternative 4 facilitates economic development.** Alternative 4 is intended to facilitate the economic development of the City by creating an expanded employment base, providing new employment opportunities, and attracting new businesses.
- **Alternative 4 provides a mix of residential, commercial, and business park uses.** Alternative 4 would implement a comprehensive master plan for the Specific Plan area that accommodates residential, commercial, and business park uses along with supporting infrastructure, enhancing orderly growth in the Specific Plan area.
- **Alternative 4 enhances retail and dining opportunities for residents and visitors within the City of Perris.** Alternative 4 enhances the local economy by providing additional jobs, and business development opportunities commensurate with forecasted growth. Alternative 4 would provide much needed retail and dining opportunities for residents and visitors within the City.
- **Alternative 4 will provide a pedestrian-oriented retail development in proximity to existing and proposed residences.** The proposed commercial development would be in close proximity to existing and proposed residences, creating a walkable environment for City of Perris residents.
- **Alternative 4 will provide essential infrastructure to support planned development within the Specific Plan area.** Alternative 4 identifies and provides for the installation and ongoing maintenance of water, sewer, drainage, and road facility infrastructure to adequately serve the Specific Plan area.
- **Alternative 4 creates a high-quality development.** Alternative 4 would allow for the accommodation of residential development, industrial, light manufacturing and assembly, warehouse distribution, logistics, and retail buildings that are designed to attract a range of users and are economically competitive with other buildings of these types in the region.
- **Alternative 4 transforms an underutilized site.** Alternative 4 would develop the underutilized site located in vicinity to the I-215 and has access to available infrastructure, including roads and utilities to accommodate the growing need for goods movement within Southern California.
- **Alternative 4 promotes sustainable development.** Alternative 4 would implement sustainable design measures that reduce potable water use, energy use, and fossil fuel consumption, supporting the City's long-term environmental and resource conservation goals.
- **Alternative 4 would implement employment generating uses along the I-215 corridor.** Alternative 4 would result in development of industrial, light manufacturing, and logistics uses along the I-215 corridor, supporting regional goods movement and employment growth.

SECTION XIII

CONTENTS AND CUSTODIAN OF RECORDS

The documents and materials that constitute the record of proceedings on which these findings have been based are located at the City of Perris Planning Division. The custodian for these records is the City of Perris. This information is provided in compliance with Public Resources Code section 21081.6.

The record of proceedings for the City's decision on the Project consists of the following documents, at a minimum:

1. The Initial Study for the Harvest Landing Retail Center & Business Park Project;
2. The NOP, NOC, and all other public notices issued by the City in conjunction with the Project;
3. All comments submitted by agencies or members of the public during the 45-day comment period on the Draft EIR;
4. The Final EIR for the Harvest Landing Retail Center & Business Park Project, including comments timely received on the Draft EIR, responses to those comments, and technical appendices;
5. The Mitigation Monitoring and Reporting Plan for the Project;
6. All findings, resolutions and ordinances adopted by the City in connection with the Harvest Landing Retail Center & Business Park Project, and all documents cited or referred to therein;
7. All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by the City, consultants to the City, or responsible or trustee agencies with respect to the City's compliance with the requirements of CEQA and with respect to the City's action on the Harvest Landing Retail Center & Business Park Project;
8. All documents submitted to the City by other public agencies or members of the public in connection with the Harvest Landing Retail Center & Business Park Project up though Project approval.
9. Matters of common knowledge to the City, including, but not limited to federal, State, and local laws and regulations;
10. Any documents expressly cited or referenced in these findings, in addition to those cited above; and
11. Any other materials required for the record of proceedings by Public Resources Code section 21167.6, subdivision (e).

The following location is where review of the record may be performed:

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