

Date: February 3, 2026
Prepared by: Meaghan Truman, Senior Environmental Planner
To: Albert Armijo, City of Perris
Site: Harvest Landing Retail Center and Business Park Project
Subject: **Responses to Californians Allied for Responsible Economy (CARE CA), Letter L6**

This memo contains responses to comments related to the Environmental Impact Report (EIR) that the City of Perris received on December 16, 2025, prior to the City’s City Council meeting on February 11, 2026 for which the Project is on the agenda. It should be noted that similar comments have been previously submitted in a comment letter to the Draft EIR, and responded to in the Final EIR, as detailed below.

As further detailed in the individual responses to comments below, none of the comments indicate that there would be a substantial increase in the severity of a previously identified environmental impact that would not be mitigated, or that there would be any of the other circumstances requiring recirculation as described in CEQA Guidelines Section 15088.5. No new significant environmental impact would result from the Project or from a new mitigation measure proposed to be implemented, there is no substantial increase in the severity of an environmental impact, no feasible project alternative or mitigation measure considerably different from others previously analyzed would lessen the environmental impacts of the proposed Project, and the EIR is not fundamentally inadequate and conclusory in nature.

Letter L6: Californians Allied for Responsible Economy (CARE CA) (19 pages) Late Comment letter

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December 16, 2025

VIA EMAIL AND U.S. MAIL

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VIA ONLINE SUBMISSION: <https://cityofperrisca.nextrequest.com>

**Re: Request for Immediate Access to Public Records – Harvest
Landing Retail Center & Business Park Project (SCH No. 2024080337)**


Dear Mr. Phung, Ms. Salazar, and Mr. Armijo:

We are writing on behalf of Californians Allied for a Responsible Economy (“CARE CA”) to request ***immediate access*** to copies of the supporting documentation that was used to prepare the updated Alternative 4 analysis of the Final Environmental Impact Report (“FEIR”) for the Harvest Landing Retail Center & Business Park Project (SCH No. 2024080337) (“Project”), proposed by HIP SoCal Properties LLC (“Applicant”) ¹. Specifically, this request includes copies of the supplemental analysis, reports and/or modeling files relied on to support the updated conclusions in the Air Quality, Noise, GHG and Transportation sections of the FEIR including the following:

- Table 8-11: Reduced Phase 1 MBU & Phase 2 Residential Alternative Regional Operational Emissions (FEIR p. 3-52);
- Table 8-13: Reduced Phase 1 MBU & Phase 2 Residential Alternative GHG Emissions (FEIR pp. 3-55 - 3-56);

¹ See Exhibit A for FEIR’s updated Alternative 4 analysis on pages 3-51 through 3-65.

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L6.1

- Table 8-14: Alternative 4 Traffic Noise Levels (FEIR pp. 3-59 - 3-60);
- Table 8-15: Alternative 4 Traffic Noise Impact Summary (FEIR pp. 3-60 - 3-61); and
- Table 8-16: Alternative 4 Trip Generation (FEIR p. 3-62)

The Project includes a Specific Plan Amendment to annex three parcels (Assessor's Parcel Numbers 305-060-042, 305-060-036, and 305-060-037) to the Specific Plan Area and designate them as Multiple Business Use (MBU) as well as add an MBU Overlay to APN 305-060-038, increasing the total Specific Plan area to 358.28 acres. In addition, the Specific Plan Amendment is proposed to change the existing land use plan of the Specific Plan area to replace residential uses with MBU and commercial uses. The proposed Phase 1 development would include a 139.89-acre business park with one parcel hub, three high cube warehouses, and three light industrial buildings totaling 1,727,579 square feet; a 22.16-acre community shopping center with a major retail building and eight retail pads totaling 250,457 square feet; and a 24.33-acre commercial big box retail site with a new 167,050-square-foot, free-standing big box discount store with a 12-pump gas station and two approximately 5,500-square-foot fast food restaurants.

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cont.

The Project site is located in the central portion of the City of Perris and Riverside County. 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.

CARE CA is a non-profit organization which advocates for a sustainable construction industry and protecting the environment and health of its communities' workforces. The organization includes the District Council of Ironworkers and Southern California Pipe Trades DC 16, along with their members, their families, and other individuals who live and work in and around the City of Perris and Riverside County.

This request is made pursuant to the California Public Records Act (Government Code §§ 7920.000, et seq.). This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a Constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

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We request ***immediate access*** to review the above documents pursuant to section 7922.525 of the Public Records Act, which requires public records to be “open to inspection at all times during the office hours of a state or local agency” and provides that “every person has a right to inspect any public record.” Therefore, the 10-day response period applicable to a “request for a copy of records” under Section 7922.535(a) does not apply to this request.

We request access to the above records in their original form, as maintained by the agency. Pursuant to Government Code Section 7922.570, if the requested documents are in electronic format, please upload them to a file hosting program such as Dropbox, NextRequest or a similar program. Alternatively, if the electronic documents are 10 MB or less (or can be easily broken into sections of 10 MB or less), they may be emailed to me as attachments.

We reserve the right to have a copy service make copies of any and all of the requested documents depending on the volume. Please contact me to arrange for transmission/duplication of the responsive records.

Please use the following contact information for all correspondence:

U.S. Mail

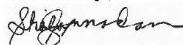
Sheila M. Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email

ssannadan@adamsbroadwell.com

If you have any questions, please call me at (650) 589-1660 or email me at ssannadan@adamsbroadwell.com. Thank you for your assistance with this matter.


Sincerely,



Sheila M. Sannadan
Legal Assistant

SMS:acp

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cont.

EXHIBIT A

L6.2

8.9.1 Environmental Impacts

Aesthetics

While onsite density would increase with development compared to the existing setting, this alternative would be visually compatible with surrounding residential and industrial development in the vicinity of the Specific Plan Area. Further, the Phase 1 MBU development square footage would be reduced, resulting in increased setbacks. However, due to the inclusion of residential uses within the Phase 2 area, onsite development has the potential to be internally incompatible due to the variety in different uses onsite. This alternative would introduce new sources of light and glare but would be similarly subject to the Perris Municipal Code. This alternative would result in less than significant impacts related to aesthetics and, therefore, would be consistent with the Project's impact.

Agricultural and Forestry Resources

Development of this alternative would result in a conversion of approximately 301.19 acres of Farmland of Local Importance. Per Section 21060.1 of the CEQA Guidelines, Farmland of Local Importance is not considered Prime, Unique, or of Statewide Importance. Because there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance at the Project site, impacts would be less than significant. Therefore, impacts would be less than significant and impacts from this alternative would be consistent with Project impacts.

Air Quality

As the overall acreage would be disturbed, the construction of the Reduced Phase 1 MBU and Phase 2 Residential Alternative would result in similar regional construction emissions as those from the proposed Project. Phase 1 building construction emissions would be reduced due to the decreased MBU square footage. However, due to the amount of Phase 2 residences that would be constructed under this alternative, Phase 2 building construction emissions may be greater than those resulting from the proposed Project. Therefore, this alternative would not avoid the Project's significant and unavoidable regional construction air quality impacts and Mitigation Measures AQ-1 through AQ-8 would be required.

This alternative would result in a net reduction of 5,282-3,486 daily trips, including 1,211-1,327 fewer truck trips, compared to the proposed Project. Table 8-4 shows the resulting regional operational emissions from buildout of the Reduced Phase 1 MBU & Phase 2 Residential Alternative utilizing the South Coast AQMD's recommended truck trip lengths without mitigation. As shown, like the proposed Project, emissions would exceed the South Coast AQMD thresholds of significance for VOC, NO_x, CO, PM₁₀, and PM_{2.5} at buildout of Alternative 4. Therefore, while emissions from operation of the Phase 2 Residential Alternative would be reduced in comparison to the proposed Project (see Table 5.3-14 in Section 5.3, *Air Quality*), this alternative would not avoid the Project's significant and unavoidable impacts related to regional operational air quality emissions. Further, due to the land use changes associated with the Phase 1 development and Phase 2 MBU development under this alternative, the alternative may still conflict with the AQMP. This alternative would also be required to implement Mitigation Measures AQ-9 through AQ-20 to reduce emissions to the maximum extent feasible. Further, additional mitigation measures and regulatory requirements (such as rooftop solar) set forth within the 2008 Harvest Landing Specific Plan EIR applying to any sports park and residential development north of Orange Avenue residential operations would be implemented under this alternative.

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cont.

Table 8-11: Reduced Phase 1 MBU & Phase 2 Residential Alternative Regional Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer						
Mobile Source	153.87	190.02	956.50	3.25	253.14	66.97
Area Source	129.93	11.85	197.20	0.08	1.12	1.04
Energy Source	0.30	5.43	3.40	0.04	0.43	0.43
Stationary Source	12.30	34.40	31.38	0.06	1.81	1.81
Gasoline Dispensing	9.35	0	0	0	0	0
Onsite Carao Equipment	1.45	4.71	202	0	0.38	0.35
Total Maximum Daily Emissions	307.20	246.41	1,390.47	3.42	256.88	70.60
South Coast AQMD Regional Thresholds of significance	55	55	550	150	150	55
Threshold Exceeded?	YES	YES	YES	NO	YES	YES
Winter						
Mobile Source	144.68	200.94	840.44	3.11	253.14	66.97
Area Source	100.97	0	0	0	0	0
Energy Source	0.30	5.43	3.40	0.04	0.43	0.43
Stationary Source	12.30	34.40	31.38	0.06	1.81	1.81
Gasoline Dispensing	9.35	0	0	0	0	0
Onsite Carao Equipment	1.45	4.71	202	0	0.38	0.35
Total Maximum Daily Emissions	269.06	245.48	1,077.22	3.20	255.76	69.55
South Coast AQMD Regional Thresholds of Significance	55	55	550	150	150	55
Threshold Exceeded?	YES	YES	YES	NO	YES	YES

Source: Urban Crossroads, 2025 (EIR Appendix W)

L6.2
cont.

Table 8-12: Phase 2 Residential Alternative Regional Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer						
Mobile Source	149.41	191.57	959.62	3.29	256.21	67.75
Area Source	136.02	11.93	206.48	0.08	1.14	1.06
Energy Source	0.31	5.43	3.40	0.03	0.43	0.43
Stationary Source	12.80	35.78	32.64	0.06	1.88	1.88
Gasoline Dispensing	9.35	0.00	0.00	0.00	0.00	0.00

Source	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Onsite Cargo Equipment	1.45	4.71	202.00	0.00	0.38	0.35
Total Maximum Daily Emissions	309.33	249.41	1,404.14	3.46	260.04	71.48
South Coast AQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	YES	YES	YES	NO	YES	YES
Winter						
Mobile Source	140.83	202.57	842.06	3.15	256.22	67.76
Area Source	105.53	10.20	4.34	0.07	0.82	0.82
Energy Source	0.31	5.43	3.40	0.03	0.43	0.43
Stationary Source	12.80	35.78	32.64	0.06	1.88	1.88
Gasoline Dispensing	9.35	0.00	0.00	0.00	0.00	0.00
Onsite Cargo Equipment	1.45	4.71	202.00	0.00	0.38	0.35
Total Maximum Daily Emissions	270.27	258.69	1,084.44	3.31	259.73	71.24
South Coast AQMD Regional Thresholds of significance	55	55	550	150	150	55
Threshold Exceeded?	YES	YES	YES	NO	YES	YES

Source: Urban Crossroads, 2025 (EIR Appendix W)

While Project impacts to sensitive receptors would be less than significant, this alternative would not include development of industrial uses within the Phase 2 area east of Indian Avenue and instead would allow the development of residential uses under the existing Harvest Landing Specific Plan. Therefore, this alternative would result in less MBU development and increased setbacks between ~~the any future MBU buildings and~~ existing sensitive receptors in the surrounding vicinity (Val Verde Elementary School and residences along Barrett Avenue). As shown in Table 5.3-49, the maximum combined construction and operational health risks would be 7.55 in one million at the existing residences along Barrett Avenue (96 feet away from the property line) with development of the overlay with implementation of all applicable mitigation. These health risk levels would result from development of a total of 5,735,535 square feet of MBU uses. In comparison to the proposed Project, this alternative would result in development of approximately 2,829,125 square feet of MBU uses. The substantial decrease in MBU square footage would result in a proportional decrease in health risks to existing sensitive receptors and likely avoid the need for Mitigation Measure AQ-21. However, future residential uses could be developed in close proximity to proposed diesel particulate matter emitting uses. As such, new residential receptors north of Orange Avenue would ~~may~~ be exposed to diesel particulate matter from operation of the proposed industrial uses and related truck emissions. However, potential impacts to these future residences would not be greater than the impacts shown in Table 5.3-49 for the existing sensitive receptors due to the substantial reduction in MBU square footage and the setbacks from the proposed MBU uses. Potential impacts to future residential uses would be less than significant concentrations leading to increased health risks, which would require additional mitigation such as MERV filters or screening requirements for proposed residences. Furthermore, mitigation measures set forth within the 2008 Harvest Landing Specific Plan EIR, which would apply to any residential development north of Orange Avenue within the area not included in the proposed Specific Plan Amendment, require installation of MERV filters in all residences. Therefore, while this alternative would not avoid the Project's significant and unavoidable regional air quality impacts or conflict with the AQMP, impacts would be reduced in comparison to the proposed Project.

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Biological Resources

As the Reduced Phase 1 MBU and Phase 2 Residential Alternative would disturb the same acreage as the proposed Project, this alternative would result in largely the same potential impacts to biological resources. Development of this alternative would require removal of existing vegetation, including shrubs, which provide nesting habitat for Migratory Bird species. Further, this alternative would result in the removal of onsite habitat for burrowing owl and the disturbance of two onsite drainages. As such, the potential impacts to biological resources at the Project site would be similar to the Project and require Mitigation Measures BIO-1 through BIO-3 to reduce potential impacts to nesting birds. These mitigation measures would also reduce potential impacts from this alternative to a less than significant level. Overall, this alternative would result in less than significant impacts to biological resources and, therefore, would be consistent with the Project's impact.

Cultural Resources

Potential archaeological impacts would be similar to those resulting from the proposed Project as grading and excavation would be required across the same acreage. As such, the potential impacts to cultural resources at the Project site would be similar to the Project and require Mitigation Measures CUL-1 and CUL-2 to reduce potential Project impacts to previously undiscovered archaeological resources and human remains. Therefore, impacts from this alternative would be similar compared to the Project, and archaeological mitigation would reduce potential impacts from this alternative to a less than significant level as with the Project. Overall, this alternative would result in less than significant impacts to cultural resources, and therefore, would be consistent with the Project's impact.

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Energy

This alternative would result in a decrease in electricity demand for Phase 1 due to the decrease in MBU square footage, but an increase in the demand for electricity at full Specific Plan buildout in comparison to the proposed Project due to the residential uses onsite. This alternative would also be required to be in compliance with Title 24 requirements. The Project would require the use of diesel fuel for trucking operations; this alternative would greatly reduce the use of diesel fuel due to the decreased MBU square footage in Phase 1 and Phase 2. As shown in Table 8-4, this alternative would reduce vehicle trips to the site by 5,282 ~~3,486~~ daily trips and therefore would reduce the consumption of gasoline. Therefore, impacts to energy from the Reduced Phase 1 MBU and Phase 2 Residential Alternative would be neutral in comparison those associated with the proposed Project and would remain less than significant.

Geology and Soils

Potential impacts related to the potential for additional workers, residents, buildings, and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site would be similar to the Project. Soil erosion impacts would also be less than significant due to compliance with water quality standards, and new development would be required to comply with regulatory requirements regarding geologic considerations such as seismic hazards from ground shaking. Further, as this alternative would disturb the entire Specific Plan Area, it would require implementation of Mitigation Measure GEO-1 which requires paleontological monitoring. With implementation of Mitigation Measure GEO-1, potential impacts from construction of the Phase 2 Residential Alternative would be reduced to a less-than-significant level. Overall, this alternative would result in less than significant impacts to geology and soils with mitigation and, therefore, would be consistent with the Project's impact.

Greenhouse Gas Emissions

This alternative would result in a net reduction of ~~5,282~~ 3,486 daily trips, including ~~1,211~~ 1,327 fewer truck trips, compared to the proposed Project. Table 8-5 shows the resulting regional operational emissions from buildout of the Phase 2 Residential Alternative utilizing the South Coast AQMD’s recommended truck trip lengths without mitigation. As shown, like the proposed Project, emissions would exceed the South Coast AQMD’s 3,000 MTCO_{2e} threshold of significance for greenhouse gas emissions. Therefore, while emissions from operation of the Reduced Phase 1 MBU and Phase 2 Residential Alternative would be reduced in comparison to the proposed Project (see Table 5.8-2 in Section 5.8, *Greenhouse Gas Emissions*), this alternative would not avoid the Project’s significant and unavoidable impacts related to greenhouse gas emissions or conflict with GHG reduction plans. Further, this alternative would also be required to implement Mitigation Measures AQ-1 through AQ-20 and GHG-1 through GHG-4 to reduce emissions to the maximum extent feasible. Further, mitigation measures set forth in the 2008 Harvest Landing Specific Plan EIR would be applicable to any residential development in the area not included within the proposed Specific Plan Amendment. Therefore, while this alternative would not avoid the Project’s significant and unavoidable greenhouse gas impacts, impacts would be reduced in comparison to the proposed Project.

Table 8-13: Reduced Phase 1 MBU & Phase 2 Residential Alternative GHG Emissions

Source	Emission (metric tons per year)				
	CO ₂	CH ₄	N ₂ O	Refrigerants	Total CO _{2e}
Phase 1 (2026)					
Annual construction-related emissions amortized over 30 years	170.97	0.00	0.01	0.15	175.48
Mobile Source	<u>31,449.04</u>	<u>1.54</u>	<u>2.27</u>	<u>46.91</u>	<u>32,209.98</u>
Area Source	<u>39.61</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>39.75</u>
Energy Source	<u>3,685.48</u>	<u>0.35</u>	<u>0.04</u>	<u>0.00</u>	<u>3,705.36</u>
Water Source	<u>577.59</u>	<u>13.11</u>	<u>0.32</u>	<u>0.00</u>	<u>999.27</u>
Waste Source	<u>296.82</u>	<u>29.67</u>	<u>0.00</u>	<u>0.00</u>	<u>1,038.47</u>
Refrigeration	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>257.04</u>	<u>257.04</u>
Stationary Source	<u>68.54</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>68.77</u>
Onsite Equipment	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>284.25</u>
Total CO_{2e} (All Sources)	<u>38,778.37</u>				
Phase 2 (2030)					
Annual construction-related emissions amortized over 30 years	424.28	0.01	0.03	0.28	432.84
Mobile Source	17,102.57	0.49	1.80	17.01	17,669.27
Area Source	191.42	0.00	0.00	0.00	191.73
Energy Source	4,528.56	0.55	0.06	0.00	4,560.67
Water Source	478.88	13.47	0.32	0.00	912.23

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Source	Emission (metric tons per year)				
	CO ₂	CH ₄	N ₂ O	Refrigerants	Total CO ₂ e
Waste Source	227.89	22.78	0.00	0.00	797.32
Refrigeration	0.00	0.00	0.00	26.71	26.71
Stationary Source	79.97	0.00	0.00	0.00	80.23
Onsite Equipment	0.00	0.00	0.00	0.00	284.25
Total CO₂e (All Sources)	24,955.25				

Phase 1 + Phase 2 (2030)

Annual construction-related emissions amortized over 30 years	595.25	0.01	0.04	0.43	608.32
Mobile Source	<u>46,071.72</u>	<u>1.82</u>	<u>3.83</u>	<u>46.86</u>	<u>47,306.87</u>
Area Source	<u>231.03</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>231.48</u>
Energy Source	<u>7,433.07</u>	<u>0.90</u>	<u>0.10</u>	<u>0.00</u>	<u>7,485.06</u>
Water Source	<u>945.41</u>	<u>26.58</u>	<u>0.64</u>	<u>0.00</u>	<u>1,800.43</u>
Waste Source	<u>524.71</u>	<u>52.45</u>	<u>0.00</u>	<u>0.00</u>	<u>1,835.79</u>
Refrigeration	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>283.75</u>	<u>283.75</u>
Stationary Source	<u>142.80</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>143.27</u>
Onsite Equipment	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>615.88</u>
Total CO₂e (All Sources)	<u>60,310.86</u>				

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Source	Emission (metric tons per year)				
	CO ₂	CH ₄	N ₂ O	Refrigerants	Total CO ₂ e

Phase 1 (2026)

Annual construction-related emissions amortized over 30 years	170.97	0.00	0.01	0.15	175.48
Mobile Source	32,009.86	1.57	2.31	47.71	32,784.17
Area Source	43.93	0.00	0.00	0.00	44.09
Energy Source	3,839.67	0.36	0.04	0.00	3,860.45
Water Source	645.99	14.72	0.35	0.00	1,119.46
Waste Source	314.72	31.45	0.00	0.00	1,101.08
Refrigeration	0.00	0.00	0.00	257.04	257.04
Stationary Source	68.54	0.00	0.00	0.00	68.77

Source	Emission (metric tons per year)				
	CO ₂	CH ₄	N ₂ O	Refrigerants	Total CO ₂ e
Onsite Equipment	0.00	0.00	0.00	0.00	284.25
Total CO₂e (All Sources)	39,694.80				
Phase 2 (2030)					
Annual construction related emissions amortized over 30 years	424.28	0.01	0.03	0.28	432.84
Mobile Source	17,102.57	0.49	1.80	17.01	17,669.27
Area Source	191.42	0.00	0.00	0.00	191.73
Energy Source	4,528.56	0.55	0.06	0.00	4,560.67
Water Source	478.88	13.47	0.32	0.00	912.23
Waste Source	227.89	22.78	0.00	0.00	797.32
Refrigeration	0.00	0.00	0.00	26.71	26.71
Stationary Source	79.97	0.00	0.00	0.00	80.23
Onsite Equipment	0.00	0.00	0.00	0.00	284.25
Total CO₂e (All Sources)	24,955.25				
Phase 1 + Phase 2 (2030)					
Annual construction related emissions amortized over 30 years	595.25	0.01	0.04	0.43	608.32
Mobile Source	46,579.53	1.82	3.88	47.16	47,827.58
Area Source	235.35	0.01	0.00	0.00	235.82
Energy Source	7,549.22	0.91	0.10	0.00	7,602.12
Water Source	1,000.79	28.18	0.68	0.00	1,907.61
Waste Source	542.61	54.23	0.00	0.00	1,898.40
Refrigeration	0.00	0.00	0.00	283.74	283.74
Stationary Source	148.51	0.01	0.00	0.00	149.01
Onsite Equipment	0.00	0.00	0.00	0.00	615.88
Total CO₂e (All Sources)	61,128.47				

Source: Urban Crossroads, 2025 (EIR Appendix W)

L6.2
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Hazards and Hazardous Materials

Under this alternative, demolition of existing residential structures onsite and potential demolition of Val Verde Elementary School would occur and removal and disposal of asbestos and lead based materials would occur. Like the proposed Project, construction of this alternative would be required to comply with existing regulations regarding the transport, use, and disposal of hazardous materials. In addition, this

alternative would likely require the same utilization of hazardous materials during operation, including diesel particulate matter, as the proposed Project. However, unlike the proposed Project, this alternative would place residential development within in March ARB/IPA ALUCP Compatibility Zone C2. Overall, this alternative would result in less than significant impacts to hazards and hazardous materials and, therefore, would be consistent with the Project's impact.

Hydrology and Water Quality

It is likely that development of this alternative would result in a decrease in impermeable surfaces compared to those required for development of the Project due to the development of the 16.5-acre sports park and additional recreational facilities in the residential portion of Phase 2. Construction of the alternative would still require construction of the same drainage facilities in the Phase 1 area and disturbance of existing onsite drainages. In addition, preparation of a SWPPP and WQMP would be required for future development in Phase 2 for this alternative. Overall, this alternative would result in less than significant impacts related to hydrology and water quality but would result in a decrease in impacts in comparison to the proposed Project.

Land Use

Both the Project and the Reduced Phase 1 MBU and Phase 2 Residential Alternative would be consistent with the environmental goals and policies of the City of Perris General Plan and Connect SoCal 2020. With implementation of measures to address other environmental issues (e.g., biological resources, cultural resources, etc.), potential impacts due to land use compatibility under both the Project and this alternative would remain less than significant. This alternative would also not physically disrupt or divide the arrangement of an established community. Overall, impacts related to land use and planning from the Reduced Phase 1 MBU and Phase 2 Residential Alternative would be less than significant and, therefore, would be consistent with the Project's impacts.

L6.2
cont.

Noise

This alternative would result in a net reduction of ~~5,282~~ ~~3,486~~ daily trips, including ~~1,211~~ ~~1,327~~ fewer truck trips, compared to the proposed Project. Using the same roadway segments identified in the 2025 Noise Study, the offsite traffic noise levels were calculated for the Reduced Phase 1 MBU and Phase 2 Residential Alternative based on the Average Daily Traffic Volumes presented in the Traffic Impact Analysis included in EIR Appendix R. Table 8-6 shows a summary of the Reduced Phase 1 MBU and Phase 2 Residential Alternative offsite traffic noise levels for each traffic scenarios outlined in the Traffic Impact Analysis. As shown, the offsite traffic noise levels for the alternative would range from 0.1 to 8.3 dBA CNEL in comparison to the Project's traffic noise levels, which would range from 0.1 to 10.6 dBA CNEL. As shown on Table 8-7, traffic noise levels would continue to exceed thresholds along Barrett Avenue between Orange Avenue and Placentia Avenue. Therefore, while traffic noise levels would be reduced in comparison to the Project, this alternative would not avoid the Project's significant and unavoidable traffic noise impact.

Short-term noise and vibration impacts during construction would be similar to the Project as the entire Specific Plan Area would be developed. The Reduced Phase 1 MBU and Phase 2 Residential Alternative is not expected to include any different, specific type of operational noise (stationary source) levels beyond the typical noise sources associated with residential land use. This includes residents moving around the site, parking activities, air conditioning units and background outdoor activities. Residential land use is generally considered noise-sensitive receiving land use. In addition, the potential noise source activities from the 16.5-acre sports park are not expected to take place during the noise sensitive nighttime hours. Like the Project, long-term operational noise would not expose nearby sensitive receivers to noise levels over the City's daytime noise standards. However, due to the less intense industrial development within the Phase 1 and Phase 2 areas under this alternative and increased distance between offsite sensitive land uses and

proposed industrial uses, impacts would be reduced under the Reduced Phase 1 MBU and Phase 2 Residential Alternative as compared to the Project. However, proposed MBU uses within the Phase 2 area would require additional noise screening, as required by the City's Good Neighbor Guidelines, to ensure that the Phase 2 onsite any future residential receivers in the area excluded from the Specific Plan Amendment would not be exposed to noise levels exceeding City standards. Given the distance between any future residential receiver in the area excluded from the Specific Plan Amendment is equal or greater than the distance of the proposed Project to existing residential receivers along Barrett Avenue, operational onsite noise impacts would be equal to or reduced compared to those identified for the proposed Project. Therefore, this alternative would result in fewer impacts than those associated with the Project; however, this alternative would not avoid the Project's significant and unavoidable traffic noise impact.

Table 8-14: Alternative 4 Traffic Noise Levels

ID	Road	Segment	Incremental Noise Level Increase (dBA CNEL)							
			2025 Noise Study				Ph2 Residential-Alt. Alternative 4			
			E	2026	2030	2045	E	2026	2030	2045
1	Indian Ave	between Placentia Ave and Orange Ave	1.1	0.3	0.9	0.6	1.1	0.3	0.9	0.6
2	Orange Ave	between Indian Ave and Perris Blvd	0.9	0.6	0.7	0.7	0.9	0.6	0.7	0.7
3	Perris Blvd	between Orange Aven and Citrus Ave	0.6	0.4	0.4	0.4	0.6	0.4	0.4	0.4
4	Barrett Ave	between Placentia Ave and Orange Ave	7.1	5.8	6.4	6.3	7.1	5.8	6.4	6.3
5	Perris Blvd	between Placentia Ave and Orange Ave	0.5	0.3	0.2	0.2	0.5	0.3	0.2	0.2
6	Perris Blvd	between Rider St and Placentia Ave	0.5	0.2	0.3	0.3	0.5	0.2	0.3	0.3
7	Nuevo Rd	between Perris Blvd and I-215 NB Ramps	0.8	0.7	0.6	0.6	0.8	0.7	0.6	0.6
8	I-215 Frontage Rd	between Placentia Ave and Orange Ave	10.0	5.6	9.4	8.2	7.9	5.6	7.4	6.3
9	I-215 Frontage Rd	between Orange Ave and Nuevo Rd	9.2	8.0	8.5	7.3	7.6	8.0	6.9	5.8
10	Orange Ave	between I-215 Frontage Rd and Indian Ave	10.6	0.3	9.9	8.7	8.3	0.3	7.6	6.5
11	Nuevo Rd	between I-215 NB Ramps and I-215 SB Ramps	0.3	0.1	0.1	0.1	0.3	0.1	0.1	0.1
12	Perris Blvd	between Citrus Ave and Nuevo Rd	1.5	1.0	1.0	0.9	1.5	1.0	1.0	0.9

L6.2 cont.

ID	Road	Segment	Incremental Noise Level Increase (dBA CNEL)							
			2025 Noise Study				Ph2 Residential Alt. Alternative 4			
			E	2026	2030	2045	E	2026	2030	2045
13	Placentia Ave	between I-215 NB Ramps and I-215 SB Ramps	5.5	1.4	3.8	3.8	4.0	1.4	2.7	2.7
14	Placentia Ave	between I-215 NB Ramps and Indian Ave	1.0	0.5	0.6	0.6	1.0	0.5	0.6	0.6
15	Placentia Ave	between Indian Ave and Perris Blvd	2.0	0.8	1.0	1.0	2.0	0.8	1.0	1.0

Source: Urban Crossroads, 2025 (EIR Appendix W)

Table 8-15: Alternative 4 Traffic Noise Impact Summary

ID	Road	Segment	Incremental Noise Level Increase Threshold Exceeded? ¹							
			2025 Noise Study				Ph2 Residential Alt. Alternative 4			
			E	2026	2030	2045	E	2026	2030	2045
1	Indian Ave	between Placentia Ave and Orange Ave	No	No	No	No	No	No	No	No
2	Orange Ave	between Indian Ave and Perris Blvd	No	No	No	No	No	No	No	No
3	Perris Blvd	between Orange Ave and Citrus Ave	No	No	No	No	No	No	No	No
4	Barrett Ave	between Placentia Ave and Orange Ave	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
5	Perris Blvd	between Placentia Ave and Orange Ave	No	No	No	No	No	No	No	No
6	Perris Blvd	between Rider St and Placentia Ave	No	No	No	No	No	No	No	No
7	Nuevo Rd	between Perris Blvd and I-215 NB Ramps	No	No	No	No	No	No	No	No
8	I-215 Frontage Rd	between Placentia Ave and Orange Ave	No	No	No	No	No	No	No	No
9	I-215 Frontage Rd	between Orange Ave and Nuevo Rd	No	No	No	No	No	No	No	No
10	Orange Ave	between I-215 Frontage Rd and Indian Ave	No	No	No	No	No	No	No	No
11	Nuevo Rd	between I-215 NB Ramps and I-215 SB Ramps	No	No	No	No	No	No	No	No

L6.2 cont.

12	Perris Blvd	between Citrus Ave and Nuevo Rd	No	No	No	No	No	No	No	No
13	Placentia Ave	between I-215 NB Ramps and I-215 SB Ramps	No	No	No	No	No	No	No	No
14	Placentia Ave	between I-215 NB Ramps and Indian Ave	No	No	No	No	No	No	No	No
15	Placentia Ave	between Indian Ave and Perris Blvd	Yes	No	No	No	Yes	No	No	No

¹ Does the Project create an incremental noise level increase exceeding the significance criteria?
Source: Urban Crossroads, 2025 (EIR Appendix W)

Population and Housing

Based on the Riverside County General Plan’s employee generation ratio of one worker for 1,030 square feet of MBU building area and one worker for every 500 square feet of commercial building area, this alternative would result in the need for approximately 3,603 ~~2,873~~ employees compared to the Project’s 6,427 employees at full Specific Plan Buildout. As discussed in the 2008 Harvest Landing Specific Plan EIR, development of the 615 residences within the Phase 2 portion east of Indian Avenue would result in approximately 2,294 residents onsite. Therefore, this Alternative would result in a reduction of people onsite compared to the 6,427 jobs that would occur under buildout of the proposed Project. Therefore, this population and employment increase would be within the SCAG growth projections from 2016 to 2045. Thus, this alternative would not result in unplanned growth inducing impacts or displacement of population and housing. Therefore, this alternative would result in similar less than significant impacts as the Project.

L6.2
cont.

Public Services

Construction of this alternative would result in generally similar impacts and result in a similar demand for sheriff services. The same fire and sheriff’s stations would serve the alternative, however the increase in the amount of residential occupants onsite would likely increase the number of service calls received by these public services compared to the Project. In addition, due to the amount of housing that would be developed by this Alternative, it would result in an increase in school aged children and increased need for public school services. In addition, this alternative would also require the payment of development impact fees imposed by Perris Ordinance No. 1182 and Government Code Section 65995 et seq. Through implementation of regulatory requirements, impacts would be less than significant. While this alternative would result in similar less than significant impacts as the Project, the potential impacts would be increased with the Phase 2 Residential Alternative.

Recreation

While this alternative would result in an additional 2,294 residents onsite, which would not occur under buildout of the Project, the Reduced Phase 1 MBU and Phase 2 Residential Alternative would include a 16.5-acre sports park to satisfy the City of Perris requirements of five acres per 1,000 residents. In addition, this alternative would be required to implement all the same Project mitigation measures related to construction for construction of the alternative’s 16.5 acres of recreational and open spaces. Therefore, this alternative would result in similar less than significant impacts as the Project, the demand for recreational services would be increased with the Phase 2 Residential Alternative.

Transportation

Under this alternative, development of the Phase 2 Residential Alternative would result in approximately ~~36,652~~ 36,837 daily trips, as shown in Table 8-8.

Table 8-16: Alternative 4 Trip Generation

Land Use	Units	Daily	AM Peak Hour			PM Peak Hour			
			In	Out	Total	In	Out	Total	
<u>PHASE 1 Total Vehicle Trip Generation</u>									
<u>PHASE 1 Industrial</u>									
Phase 1 MBU Area (0.25 FAR)	761.102	TSF	2,565	54	13	66	36	56	91
Parcel Hub (Building 1)	391.725	TSF	1,814	137	137	274	170	80	251
<u>PHASE 1 Commercial</u>									
Total Medical Office Trip Generation	5.500	TSF	198	13	4	17	6	15	21
Total Large Format Retail Anchor Trip Generation	167.050	TSF	7,258	136	111	246	186	215	401
Total Shopping Center Generation	189.845	TSF	7,026	99	61	159	220	238	458
Total Supermarket Trip Generation	23.256	TSF	1,877	31	22	53	59	65	123
Total Fast Casual Restaurant Trip Generation	8.934	TSF	720	5	5	10	43	28	71
Total High Turnover Restaurant Trip Generation	21.122	TSF	1,879	82	77	160	46	24	70
Total Fast Food Restaurant Trip Generation	11.000	TSF	2,134	93	102	195	25	19	43
Total Coffee/Donut Shop Restaurant Trip Generation	1.800	TSF	399	29	32	61	11	9	20
Total Gasoline/Service Station Trip Generation	12	VFP	763	18	18	36	27	29	56
COMMERCIAL TOTAL	428.507	KSF	22,254	505	433	938	622	642	1,263
Phase 1 Total Project Passenger Car Trip Generation			25,973	672	563	1,235	808	764	1,571
Phase 1 Total Project Truck Trip Generation (Non PCE)			523	660	24	19	43	20	14
Phase 1 Total Project Trip Generation (Non PCE)			26,632	696	582	1,278	828	778	1,605
<u>PHASE 2 Total Vehicle Trip Generation</u>									
Industrial Park	1,676.298	TSF	5,649	462	108	570	125	445	570
Low Residential ¹⁴	110	DU	1,037	20	57	77	65	38	103
Med Residential ¹⁵	160	DU	1,078	15	49	64	51	31	82
High Residential ¹⁶	345	DU	1,566	30	98	128	82	53	135
RESIDENTIAL TOTAL	615	DU	3,682	65	204	269	198	122	320
Sport Park	16.5	Acres	689	15	12	27	39	39	78
Phase 2 Total Project Passenger Car Trip Generation			9,066	487	312	798	348	553	900
Phase 2 Total Project Truck Trip Generation (Non PCE)			954	54	13	68	14	53	67
Phase 2 Total Project Trip Generation (Non PCE)			10,020	541	324	866	362	606	967
Total Project Passenger Car Trip Generation			35,039	1,159	875	2,033	1,156	1,317	2,471
Total Project Truck Trip Generation (Non PCE)			1,614	78	32	111	34	67	101
Total Project Trip Generation (Non PCE)			36,652	1,237	907	2,144	1,190	1,384	2,572

L6.2
cont.

Land-Use	Units	Daily	AM Peak Hour			PM Peak Hour			
			In	Out	Total	In	Out	Total	
PHASE 1 Total Vehicle Trip Generation									
PHASE 1 Industrial									
TUMF High-Cube (Building 2, 6, and 7)	1,207,000	TSF	2,105	85	20	105	56	88	145
Parcel Hub (Building 1)	222,079	TSF	1,491	113	113	226	140	66	206
General Light Industrial (Building 3, 4, and 5)	198,500	TSF	967	129	18	147	18	111	129
PHASE 1 Commercial									
Total Medical Office Trip Generation			198	13	4	17	6	15	21
Total Retail Trip Generation	-	-	7,258	136	111	246	186	215	401
Total Retail Trip Generation	-	-	7,026	99	61	159	220	238	458
Total Retail Trip Generation	-	-	1,877	31	22	53	59	65	123
Total Restaurant Trip Generation	-	-	720	5	5	10	42	28	71
Total Restaurant Trip Generation	-	-	1,879	82	77	160	46	24	70
Total Restaurant Trip Generation	-	-	2,124	92	102	195	25	19	43
Total Restaurant Trip Generation	-	-	399	29	32	61	11	9	20
Total Retail Trip Generation	-	-	763	18	18	36	27	29	56
COMMERCIAL TOTAL	428,507	KSF	22,254	505	433	938	622	642	1,263
Phase 1 Total Project Passenger Car Trip Generation	-	-	26,272	801	565	1,366	819	891	1,709
Phase 1 Total Project Truck Trip Generation (Non-PCE)	-	-	545	32	18	49	17	16	34
Phase 1 Total Project Trip Generation (Non-PCE)	-	-	26,817	832	583	1,415	836	907	1,743
Phase 1 Total Project Trip Generation (PCE)	-	-	27,621	879	610	1,489	863	922	1,793
PHASE 2 Total Vehicle Trip Generation									
Industrial Park	1,676,298	TSF	5,649	462	108	570	125	445	570
Low Residential ¹⁴	110	DU	1,037	20	57	77	65	38	103
Med Residential ¹⁵	160	DU	1,078	15	49	64	51	31	82
High Residential ¹⁶	345	DU	1,566	30	98	128	82	53	136
Total Residential Trip Generation	-	-	3,682	65	204	269	198	122	320
-	-	-	-	-	-	-	-	-	-
Sport Park	16.5	Acres	689	15	12	27	39	39	78
Phase 2 Total Project Passenger Car Trip Generation	-	-	9,066	487	312	798	348	553	900

L6.2
cont.

Land-Use	-	Units	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Phase 2 Total Project Truck Trip Generation (Non-PCE)	-	-	954	54	12	66	14	52	67
Phase 2 Total Project Trip Generation (Non-PCE)	-	-	10,020	541	224	766	362	606	967
Phase 2 Total Project Trip Generation (PCE)	-	-	11,446	623	344	967	383	685	1,067
Total Project Passenger Car Trip Generation	-	-	35,338	1,288	877	2,164	1,167	1,444	2,609
Total Project Truck Trip Generation (Non-PCE)	-	-	1,499	86	31	117	31	70	100
Total Project Trip Generation (Non-PCE)	-	-	36,837	1,374	907	2,281	1,198	1,513	2,710

This alternative would result in substantially fewer trips than the Project, which is calculated to generate 40,321 daily trips including 2,778 AM peak hour and 3,106 PM peak hour trips. With respect to VMT, due to the continued inclusion of commercial uses and additional inclusion of residences compared to the Project, this alternative is unlikely to avoid the Project's significant and unavoidable Project-specific VMT impact. Therefore, it would be presumed that this alternative would result in significant and unavoidable impacts related to VMT, consistent with the proposed Project. Impacts from this alternative would be similar to the Project.

Tribal Cultural Resources

Potential tribal cultural resource impacts would be similar to those resulting from the proposed Project as grading and excavation would be required across the same acreage. As such, the impacts to tribal cultural resources at the Project site would be similar to the Project and require Mitigation Measures CUL-1 and CUL-2 to reduce potential Project impacts through tribal monitoring. Therefore, potential impacts from this alternative would be similar compared to the Project and mitigation would reduce potential impacts from this alternative to a less than significant level as with the Project. Overall, this alternative would result in less than significant impacts to tribal cultural resources and, therefore, would be consistent with the Project's impact.

Utilities and Service Systems

Both the Project and this alternative would require the construction of water, wastewater, stormwater drainage, electric power, natural gas, and telecommunication facilities onsite. Impacts associated with the provision of such facilities would be similar and would be less than significant with compliance to existing regulatory requirements. Due to the decrease in industrial development and increase in residential development, water demand would slightly increase under this alternative. However, water demand would continue to be within projected water demands projected by the EMWD UWMP. Similarly, the EMWD would have adequate capacity to treat wastewater generated under both the Project and this alternative; however, this alternative would generate more wastewater than the proposed Project. In addition, this alternative would be subject to City and State solid waste regulations and the alternative would not result in the generation of solid waste in excess of El Sobrante Landfill and/or Badlands Landfill capacity. Overall, while this alternative would result in less than significant impacts related to utilities and service systems, it would result in an increase in impacts in comparison to the proposed Project.

L6.2
cont.

8.9.2 Conclusion

Ability to Reduce Impacts

This alternative would result in development of the entire 358.28-acre Specific Plan Area with approximately ~~2,829,125~~ ~~3,403,877~~ square feet of MBU uses, 428,507 square feet of commercial retail uses, 615 dwelling units, and a 16.5-acre sports park. 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).

Ability to Achieve Project Objectives

As shown in Table 8-10 below, the Phase 1 Reduced MBU and 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. ~~Further, it would decrease the amount of units that would be required to be offset elsewhere in the City under SB 330.~~

Section 8.10 Environmentally Superior Alternative

Based on public comments received on the Draft EIR and the City of Perris's proposed warehouse moratorium, Alternative 4 was revised to remove warehouses from Phase 1, as outlined below:

L6.2
cont.

Response to Letter L6: Californians Allied for Responsible Economy (CARE CA), dated December 16, 2025

This comment letter was received after the Draft EIR public review and comment period ended on July 14, 2025. As stated in Section 15088 of the CEQA Guidelines, Lead Agencies are not required to respond to letters received outside of the noticed comment period. However, the following responses have been prepared to provide clarity regarding the environmental concerns that have been raised and to enhance the administrative record for consideration of the Project by the City of Perris City Council.

Comment L6.1: This comment requests supporting documentation, including supplemental analyses, reports, and/or modeling files relied upon to support the revised Alternative 4 air quality, noise, greenhouse gas emissions, and transportation analyses in the Final EIR, including Tables 8-11 and 8-13 through 8-16, be uploaded to a file sharing platform and emailed to ssannadan@adamsbroadwel.com for review. This comment also provides a summary of the proposed Project and its location, a description of CARE CA and its advocacy, and the public records request process pursuant to the California Public Records Act (Government Code §§ 7920.000, et seq.).

Response L6.1: This comment is introductory in nature and does not raise specific issues with the adequacy of the Final EIR. In response to the request for information, all public records were compiled, and an access link was emailed by the City to ssannadan@adamsbroadwel.com on February 3, 2026. Because the comment does not express any specific concern or question regarding the adequacy of the Final EIR, no further response is warranted.

Comment L6.2: This comment includes Exhibit A, consisting of a copy of Final EIR Section 3.0, *Revisions to the Draft EIR*, pages 3-51 through 3-65.

Response L6.2: This comment is informational in nature and does not raise specific issues with the adequacy of the Final EIR. Because the comment does not express any specific concern or question regarding the adequacy of the Final EIR, no further response is warranted.