Initial Study / Mitigated Negative Declaration No. 2342

IDI – INDIAN AVENUE AND RAMONA EXPRESSWAY WAREHOUSE PROJECT

Lead Agency:

City of Perris
Planning Division
135 N. “D” Street
Perris, California 92570

June 2019

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ACRONYMS LIST

Acronym	Definition
AB 32	Assembly Bill 32
AB 52	Assembly Bill 52
ADA	American Disabilities Act
AICUZ	Air Installation Compatible Use Zone Study
AFB	Air Force Base
ALUC	Airport Land Use Compatibility
ALUCP	Airport Land Use Compatibility Plan
AQMP	Air Quality Management Plan
APE	Area of Potential Effect
APN	Assessor Parcel Number
APZ	Accident Potential Zone
ARB	Air Resources Board
AST	Aboveground Storage Tank
Basin	South Coast Air Basin
BMPs	Best Management Practices
BTR	Biological Technical Report
CAP	Climate Acton Plan
CAPSSA	Criteria Area Plant Species Survey Area
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CFS	Cubic Feet Per Second
City	City of Perris
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CIWMP	Countywide Integrated Waste Management Plan
DBA	A-Weighted Decibels
DCDA	Double Check Detector Assembly
DCV	Design Capture Volume
DIF	Development Impact Fees
DPM	Diesel Particulate Matter
DPR	Development Plan Review
ECHO	Enforcement & Compliance History Information
EIC	Eastern Information Center
EIR	Environmental Impact Report
EMWD	Eastern Municipal Water District
ESA	Environmental Site Assessment
FAR	Federal Aviation Regulations
FEMA	Federal Emergency Management Agency
FINDS	Facility Index System/Facility Registry System
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping Management Program
Form	Environmental Checklist Form
FTA	Federal Transit Administration

GHG	Greenhouse Gas
GP	City of Perris General Plan 2030
HABS	Historic American Buildings Survey
HAER	Historic American Engineering Record
HANS	Habitat Evaluation and Acquisition Negotiation Strategy
HCOC	Hydrologic Conditions of Concern
HD	Heavy-Duty
HVLP	High Volume Low Pressure
HWM	High-Water Mark
I-215	Interstate 215
IS	Initial Study
ITE	Institute of Transportation Engineers
JPR	Joint Project Review
LID	Low Impact Design
LOS	Level of Service
LQG	Large Quantity Generators
LST	Localized Significance Threshold
MARB	March Air Reserve Base
MD	Medium-Duty
MEP	Maximum Extent Practicable
MGD	Million Gallons Per Day
MHFP	Multi-Hazard Functional Plan
MLD	Most Likely Descendent
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
MRZ	Mineral Resources Zone
MS4	Municipal Separate Storm Water Sewer System
MSR	Million Solar Roofs
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
$MTCO_2e$	Metric Tons Carbon Dioxide Equivalent
MWD	Metropolitan Water District
NAHC	Native American Heritage Commission
ND	Negative Declaration
NEPSSA	Narrow Endemic Plant Species Survey Area
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
OHWM	Ordinary High Water Mark
PCE	Passenger Car-Equivalent
PM-2.5	Particulate Matter Less Than 2.5 Microns in Diameter
PM-10	Particulate Matter Less Than 10 Microns in Diameter
POCs	Points of Connections
PPM	Parts Per Million
PRIMMP	Paleontological Resource Impact Mitigation Monitoring Program
PVCCSP	Perris Valley Commerce Center Specific Plan
PVCCSP EIR	Perris Valley Commerce Center Specific Plan Environmental Impact

	Report
PVRWRF	Perris Valley Regional Water Reclamation Facility
PVSC	Perris Valley Storm Channel
RCA	Regional Conservation Authority
RCBs	Reinforced Concrete Boxes
RCRA	Resource Conservation Recovery Act
RCTC	Riverside County Transportation Commission
REC	Recognized Environmental Conditions
ROW	Right-of-Way
RPA	Register for Professional Archaeologists
RTA	Riverside Transit Agency
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SARWQCB	Santa Ana Regional Water Quality Control Board
SB 32	Senate Bill 32
SB 221	Senate Bill 221
SB 610	Senate Bill 610
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SKR	Stephen's Kangaroo Rat
SKR HCP	Stephen's Kangaroo Rat Habitat Plan
SLF	Sacred Lands File
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TIA	Traffic Impact Analysis
TPM	Tentative Parcel Map
UCR-ARU	University of California, Riverside Archaeological Research Unit
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VdB	Vibration Decibels
WQMP	Water Quality Management Plan
WRCOG	Western Riverside County Council of Government
WSA	Water Supply Assessment

SECTION 1.0 INTRODUCTION

1.1 PURPOSE AND SCOPE

Pursuant to the California Environmental Quality Act (CEQA, *California Public Resources Code,* Sections 21000, et seq.) and the Guidelines for Implementation of the California Environmental Quality Act (State *CEQA Guidelines*, *California Code of Regulations,* Title 14, Sections 15000 et seq.), this Initial Study (IS) has been prepared in order to determine whether implementation of the proposed IDI – Indian Avenue and Ramona Expressway Warehouse Project and off-site improvement area (herein collectively referred to as proposed Project or Project) could result in potentially significant environmental impacts that would require the preparation of an Environmental Impact Report (EIR). Section 5.0 of this IS has evaluated each of the issue areas contained in the checklist provided in Appendix G to the State *CEQA Guidelines*[1]. The objective of this environmental document is to inform City of Perris (City) decision makers, representatives of other affected/responsible agencies, and other interested parties of the potential environmental effects that may be associated with the proposed Project.

If an IS prepared for a proposed project determines that no significant effects on the environment would occur or that potentially significant impacts can be reduced to less than significant levels with implementation of specified mitigation measures, the Lead Agency can prepare a Negative Declaration (ND) or a Mitigated Negative Declaration (MND) pursuant to the State *CEQA Guidelines* (14 California Code of Regulations, Sections 15070–15075). An ND or MND is a statement by the Lead Agency attesting that a project would produce less than significant impacts or that potentially significant impacts can be reduced to less than significant levels with mitigation. If an IS prepared for a proposed project determines it may produce significant effects on the environment and no mitigation measures are identified to reduce the impacts to less than significant levels, an EIR shall be prepared. This further environmental review is required to address the potentially significant environmental effects of the project and to provide mitigation where necessary and feasible.

The proposed Project site and off-site improvement area is within the Perris Valley Commerce Center Specific Plan (PVCCSP) area and is consistent with the land use and growth assumptions anticipated in the Specific Plan. The PVCCSP was adopted by the City on January 12, 2012 (Ordinance No. 1284). The environmental impacts resulting from implementation of allowed development under the PVCCSP have been evaluated in the Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (PVCCSP EIR) (State Clearinghouse No. 2009081086) certified by the City in January 2012. The PVCCSP EIR is a program EIR, and project-specific evaluations in a later-tier environmental documents for individual development projects within the Specific Plan area was anticipated. As stated in Section 15168(d)(3) of the State *CEQA Guidelines*, "The program EIR can focus an EIR on a subsequent project to permit discussion solely of new effects which had not been considered before". As such, the environmental analysis for the proposed Project presented in this IS is based on, or "tiered" from, the analysis presented in the PVCCSP EIR, when applicable, and the PVCCSP EIR is incorporated by reference (refer to Section 2.4 of this IS).

[1] The proposed Project application was deemed complete in 2018 and the Mitigated Negative Declaration (MND) that is being prepared for the proposed Project was started well before the amendments to Appendix G of the State *CEQA Guidelines* were adopted. Additionally, the City has not adopted the new Appendix G CEQA Guidelines.

The PVCCSP EIR analyzes the direct and indirect impacts resulting from implementation of the allowed development under the PVCCSP. Measures to mitigate, to the extent feasible, the significant adverse project and cumulative impacts resulting from that development are identified in the EIR. In conjunction with certification of the PVCCSP EIR, the City also adopted a Mitigation Monitoring and Reporting Program (MMRP). Additionally, the PVCCSP includes Standards and Guidelines to be applied to future development projects within the Specific Plan area. The City requires that future development projects in the Specific Plan area comply with the required PVCCSP Standards and Guidelines and PVCCSP EIR mitigation measures as outlined in the MMRP and that these requirements are implemented in a timely manner. Relevant Standards and Guidelines and PVCCSP EIR mitigation measures that are incorporated into the proposed Project are listed in the introduction to the analysis for each topical issue in Section 5.0 and are assumed in the analysis presented.

Pursuant to the provisions of CEQA and the State *CEQA Guidelines*, the City of Perris is the Lead Agency and is charged with the responsibility of deciding whether or not to approve the proposed Project.

1.2 FINDINGS OF THIS INITIAL STUDY

This IS is based on an Environmental Checklist Form (Form), as suggested in Section 15063(d)(3) of the State *CEQA Guidelines*. The Form is found in Section 5.0 of this IS. It contains a series of questions about the proposed Project for each of the listed environmental topics. The Form is used to evaluate whether or not there are any significant environmental effects associated with implementation of the proposed Project, even with implementation of required PVCCSP Standards and Guidelines and PVCCSP EIR mitigation measures. The explanation for each answer is also included in Section 5.0.

The Form is used to review the potential environmental effects of the proposed Project for each of the following areas:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Mandatory Findings of Significance

As identified through the analysis presented in this IS, with incorporation of applicable mitigation measures from the PVCCSP EIR, PVCCSP Standards and Guidelines, and Project mitigation measures, the proposed Project would have no potentially significant impacts after implementation of mitigation measures that would require the preparation of an EIR.

1.3 CONTACT PERSON

The Lead Agency for the proposed Project is the City of Perris. Any questions about the preparation of the IS, its assumptions, or its conclusions should be referred to the following:

Mary Blais, Contract Planner
City of Perris Planning Division
135 North “D” Street Perris, California 92570
(951) 943-5003

SECTION 2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION AND SETTING

The approximate 24.2-acre Project site is located at the northwest corner of Ramona Expressway and Indian Avenue within the PVCCSP area in the City of Perris (City) in Riverside County. The approximate 2.64-acre off-site improvement area extends east from the northeast portion of the Project site connecting to the intersection of Indian Avenue and Perry Street; the off-site improvement area is also within the PVCCSP area in the City. **Figure 1 – Regional Map** depicts the regional location of the Project site and off-site improvement area, and **Figure 2 – Aerial Map** depicts the local vicinity of the Project site and off-site improvement area. The Project site is comprised of Assessor Parcel Numbers (APNs) 302-060-005, 302-060-006, 302-060-038, 302-050-036, and 302-050-034 and the off-site improvement area is comprised of APN 302-060-002 and right-of-way (ROW). The Project site and off-site improvement area is located in Sections 6 and 7 Township 4 South, Range 3 West of the San Bernardino Baseline and Meridian, identified on the Perris, California United States Geological Survey (USGS) 7.5 Quadrangle Map as depicted on **Figure 3 – USGS Map**. The City's General Plan land use and Zoning designation for the Project site and off-site improvement area is PVCCSP with an Airport Overlay. The PVCCSP designation for the Project site and off-site improvement area is Light Industrial (LI) (see **Figure 4 – General Plan Land Use Map, Figure 5 – Zoning Map, and Figure 6 – Specific Plan Land Use Map**).

The Project site and off-site improvement area is currently undeveloped and vacant. Vegetation on the Project site and off-site improvement area includes ruderal/disturbed/developed vegetation. The Project site is immediately surrounded by West Perry Street to the north, Ramona Expressway to the south, vacant land and Indian Avenue to the east, and the Perris Valley Logistic Center (DPR No. 07-07-0029) to the west. The off-site improvement area is immediately surrounded by West Perry Street to the north, vacant land to the south, Indian Avenue to the east, and the Project site and the Eastern Municipal Water District (EMWD) well site to the west. The land uses surrounding the Project site and off-site improvement area include a mix of undeveloped, vacant land and industrial uses to the north, industrial uses to the south and west, and a mix of vacant land, commercial uses, and non-conforming residential uses to the east. The Project site and off-site improvement area is relatively flat, with elevations ranging from 1,457 to 1,467 feet above mean sea level and gently sloping from northwest to east/southeast.

As further discussed in the Biological Resources section of this IS, the Project site and off-site improvement area is within the Mead Valley Area Plan of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The Project site and off-site improvement area is not located within any designated MSHCP "Criteria Area" cells, and it is not within a "Core" or "Linkage" area. No MSHCP riparian or vernal pool resources (Section 6.1.2 of the MSHCP) were documented within or immediately adjacent to the Project site and off-site improvement area.

An existing concrete-lined concrete-bottomed, roadside ditch is located along the southern portion of the Project site along with an existing dirt access road next to the ditch. The roadside ditch drains wholly upland areas, which ultimately will connect to the Perris Valley Storm Channel (PVSC), and does not support a relatively permanent flow of water. Areas west of the Project site contain a concrete-bottomed, concrete-sided flood control channel which discharges into a down-drain westerly of the Project boundary. Flows from this off-site flood control channel discharges into the storm drain system before entering the Project site.

The Project site and off-site improvement area is located approximately 1 mile southeast of March Air Reserve Base (MARB) and is within the MARB Airport Influence Policy Area. Specifically, the Project site and off-site improvement area is within the Horizontal Surface of the Federal Aviation Regulations (FAR), Part 77 (Imaginary Surfaces), Compatibility Zone B1, and Accident Potential Zone (APZ) I and II of the 2014 MARB/Inland Port Airport Land Use Compatibility Plan (ALUCP) (see **Figure 7 – March Air Reserve Base Compatibility and Accident Potential Zones**).

The MARB/Inland Port ALUCP limits the total number of people permitted on a development site at any time in the APZ I and APZ II areas. The northern portion of the Project site and off-site improvement area, where parking and access is proposed, is within APZ I while the southern portion of the site, where the warehouse building, parking, and access are proposed, is within APZ II (see **Figure 7 and Figure 8 – Proposed Site Plan**). The proposed Project is required to comply with the maximum people allowed on site at any given time (limited to 25 people per acre in the APZ I and limited to 50 people per acre in the APZ II) and comply with the maximum 50 percent lot coverage per the applicable APZs. Additionally, the Zone B1 (Inner Approach/Departure Zone) and APZ I and II where the Project site is within, restricts certain types of uses on site (i.e., schools, day care centers, libraries, hospitals, congregate care facilities, hotels, restaurants, hazardous materials manufacture/storage, hazards to flight, etc.). As discussed below, the Project is consistent with all Zone B1 and APZ I and II requirements.

2.2 PROJECT DESCRIPTION

The proposed IDI Indian Avenue and Ramona Expressway Warehouse Project and off-site improvement area (herein collectively referred to as proposed Project or Project) involves the construction and operation of approximately 428,730 square feet of industrial high-cube, non-refrigerated warehouse/distribution uses including approximately 8,800 square feet of supporting office uses on an approximately 24.2-acre site (see **Figure 8 – Proposed Site Plan**). One warehouse building is proposed on the portion of the Project site bounded by Ramona Expressway to the south, Indian Avenue to the east, and Perry Street to the north. The warehouse building will feature approximately 66 dock doors on the northern side of the building.

The proposed Project has been designed to be in compliance with the applicable Standards and Guidelines outlined in the PVCCSP, including but not limited to landscape, parkway, setback, lot coverage, floor area ratio, architectural requirements, and light and glare requirements. Landscaping, walls and fences would be provided on site as required for screening, privacy, and security. The proposed Project will also comply with the PVCCSP employee amenities guidelines by providing employee break areas, as required. The proposed Project will comply with all requirements under Compatibility B1, APZ I, and APZ II of the 2014 MARB/Inland Port ALUCP, as discussed in detail in the Hazards and Hazardous Materials and Noise sections of this IS.

Trucks would use PVCCSP-designated truck routes to travel to and from the Project site. The closest truck routes to the Project site are Harley Knox Boulevard that runs east-west and provides access to the Interstate 215 (I-215) freeway, and Indian Avenue that runs north-south. Trucks using the proposed Project site would access Harley Knox Boulevard via Indian Avenue. Harley Knox Boulevard has an interchange at the I-215 freeway (see **Figure 2**). As discussed later in the Traffic and Transportation section of the IS, implementation of **MM Transportation 4** shall require signage be posted on-site directing truck drivers to use the existing City truck route on Harley Knox Boulevard. The information on the signage will

be coordinated with City Planning and the City's Traffic Engineer during the plan check process.

As shown on **Figure 8**, automobile and trailer parking would be provided on site; the number of parking stalls provided would be consistent with the parking requirements outlined in Section 19.69 of the Perris Zoning Ordinance for high-cube warehousing. The Project will provide approximately 206 standard automobile parking stalls and approximately 205 trailer parking stalls on site. The proposed Project will incorporate bicycle parking, designated parking for clean air vehicles, and installation of electric vehicle supply equipment per Section 5.106.4, Section 5.106.5.2, and Section 5.106.5.3 of CALGreen Code, respectively.

Construction of the proposed Project would involve mass grading of the Project site with approximately 108,000 cubic yards of cut, approximately 140,200 cubic yards of fill, and 22,200 cubic yards of shrinkage which would require approximately 10,000 cubic yards of import. Construction is expected to be initiated in 2019 and completed in 2020. The proposed industrial use is consistent with the land use designation of the PVCCSP; no General Plan Amendment, Specific Plan amendment, or zone change is required.

Off-Site Improvements

The approximately 2.64-acre off-site improvements include the construction of Driveway 2 for trucks, to be solely used for egress and ingress to and from the Project site, open landscaped area at the southwest corner of West Perry Street and Indian Avenue, and West Perry Street and Indian Avenue intersection improvements (e.g., signal and median). The proposed Driveway 2 and open landscaped area is currently owned by a private property owner. The Project applicant is in the process of acquiring this area from this owner for these off-site improvements.

Roadway Improvements

The proposed Project would include roadway improvements to Ramona Expressway, Indian Avenue, and Perry Street. Ramona Expressway is an east-west oriented roadway located along the Project's southern boundary. The Project applicant will construct Ramona Expressway to its ultimate half-section width as an Expressway (184-foot right-of-way) between the western Project boundary and Indian Avenue consistent with the PVCCSP and the City's General Plan Circulation Element.

Indian Avenue is a north-south oriented roadway located along the Project's eastern boundary. The Project applicant will construct Indian Avenue to its ultimate half-section width as a Secondary Arterial (94-foot right-of-way) including sidewalk between the northern Project boundary (at the proposed Driveway 3) and Ramona Expressway consistent with the PVCCSP and City's General Plan Circulation Element.

A portion of Perry Street will be vacated and will remain as right-of-way with a proposed 10-foot EMWD easement.

Site Access Improvements

Figure 8 depicts the three proposed driveways for the Project. Driveway 1 off Ramona Expressway will be right-in right-out access only for passenger cars, Driveway 2 off Indian Avenue will be full access only for trucks, and Driveway 3 off Indian Avenue will be right-in right-out access only for passenger cars. The site access driveway improvements which will be implemented as part of the Project are described below in more detail.

Driveway 1 off Ramona Expressway – Install a stop control on the southbound approach and construct the intersection with the following geometrics:

- Northbound Approach: Not Applicable.
- Southbound Approach (Project Driveway 1): One right turn lane.
- Eastbound Approach (Ramona Expressway): Three through lanes.
- Westbound Approach (Ramona Expressway): Three through lanes and a defacto right turn lane.

Driveway 2 off Indian Avenue – Install traffic signal and construct the intersection with the following geometrics:

- Northbound Approach (Project Driveway 2): One left turn lane and one right turn lane.
- Southbound Approach: Not Applicable.
- Eastbound Approach (Indian Avenue): One through lane and one shared through-right turn lane.
- Westbound Approach (Indian Avenue): One left turn lane with a minimum of 150-feet of storage and two through lanes.

Although Driveway 2 is not anticipated to warrant a traffic signal based on future projected daily traffic, the Project applicant is proposing the installation of a traffic signal as it is proposed to accommodate access to trucks heading to and from the north (Harley Knox Boulevard via Indian Avenue). In addition, Driveway 2 will be designed in such a way to prohibit trucks heading to the south towards Ramona Expressway. The intersection of Driveway 2 would include a reduced turning radius on the southwest corner in order to physically discourage trucks from taking an eastbound right turn to head southbound on Indian Avenue towards Ramona Expressway.

Driveway 3 off Indian Avenue – Install a stop control on the eastbound approach and construct the intersection with the following geometrics:

- Northbound Approach (Indian Avenue): Two through lanes.
- Southbound Approach (Indian Avenue): One through lane and one shared through-right turn lane.
- Eastbound Approach (Project Driveway 3): One right turn lane.
- Westbound Approach: Not Applicable.

Infrastructure Improvements

Water

The proposed Project will involve installation of an 18-inch diameter waterline in a portion of Indian Avenue between Markham Street and Perry Street and a 12-inch diameter waterline

between Perry Street and Ramona Expressway as shown on **Figure 9 – Water Facilities**. On-site water pipeline improvements include a 10-inch diameter waterline loop around the proposed building. A domestic waterline lateral with meter will also be required between the proposed 12-inch diameter waterline in Indian Avenue and proposed building. The existing 8-inch diameter waterline along the northern portion of the Project site will be abandoned and the existing 12-, 18-, and 20-inch diameter waterlines immediately north of the Project site will also be abandoned.

Recycled Water

The proposed Project will involve installation of a 12-inch diameter recycled waterline in Indian Avenue from the stub out to the intersection of Ramona Expressway and Indian Avenue. An 8-inch diameter waterline is also proposed for the proposed water quality basin located on the northern portion of the Project site (see **Figure 10 – Recycled Water Facilities**).

Stormwater

The proposed Project will involve connecting the two reaches of the existing Line E storm drain that exist on both sides of the Project, along Ramona Expressway. Reinforced concrete boxes (RCBs) will connect the existing channel on the west of the site to the existing RCB to the east of the site. Line E will convey off-site flows. On-site flows will be conveyed into the proposed water quality basin located north of the site via a newly-constructed, private storm drain (see **Figure 8**). All runoff generated by the site will drain to the water quality basin and convey outflow into a proposed pump station. The pump station will drain into Lateral E-3.2 to collect local street flow. Lateral E-3.2 will convey flow to existing Line E-3 (along Indian Avenue), and then to Line E. The existing pump station west of the Project site, along Ramona Expressway, will be relocated to the southeastern portion of the Project site (see **Figure 8**).

Sewer

The proposed Project will involve installation of a 6-inch sewer line on the southern side of the proposed warehouse building and will connect to the existing 16-inch sewer along Ramona Expressway (see **Figure 8**).

2.3 PROJECT APPROVALS

The following approvals and permits are required from the City of Perris to implement the proposed Project:

- Adopt the Mitigated Negative Declaration (MND) with the determination that the MND has been prepared in compliance with the requirements of CEQA;

- Development Plan Review (DPR# 18-00002) to allow the development of the approximately 24.2-acre site for an approximately 428,730–square-foot warehouse including approximately 8,800 square feet of supporting office space and an approximately 2.64-acre off-site improvement area; and

- Tentative Parcel Map (TPM#37457) application submitted to merge multiple parcels into one and vacate unimproved Perry Street.

- Approve the Agricultural Diminishment and Notice of Nonrenewal applications to cancel the Williamson Act Contract for the Project site.

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

- Review and approval of all off-site infrastructure plans, including street and utility improvements pursuant to the conditions of approval;
- Review all on-site plans, including grading and on-site utilities; and
- Approval of a Preliminary Water Quality Management Plan (WQMP) to mitigate post-construction runoff flows.

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

- A National Pollutant Discharge Elimination System (NPDES) permit from the Santa Ana Regional Water Quality Control Board (RWQCB) to ensure that construction site drainage velocities are equal to or less than the pre-construction conditions and downstream water quality is not worsened;
- Approval of water and sewer improvement plans by the EMWD;
- Encroachment permit from Riverside County Flood Control and Water Conservation District;
- Santa Ana RWQCB, compliance with Waste Discharge Requirements, resulting in the issuance of a Waste Discharge Order under the California Water Code; and
- California Department of Fish and Wildlife, a Fish and Game Code Section 1602 Streambed Alteration Agreement.

2.4 DOCUMENTS INCORPORATED BY REFERENCE

The following reports and/or studies are applicable to development of the Project site and are hereby incorporated by reference:

- *Perris Comprehensive General Plan 2030,* City of Perris, originally approved on April 26, 2005.
- *Perris General Plan 2030 Draft Environmental Impact Report,* SCH No. 2004031135, certified April 26, 2005.
- *Perris Valley Commerce Center Specific Plan*, adopted January 10, 2012.
- *Perris Valley Commerce Center Final Environmental Impact Report*, SCH 2009081086, certified January 10, 2012.
- *Perris Valley Commerce Center Specific Plan Amendment No. 8, adopted July 2018.*

These reports/studies are available for review at:

Public Service Counter
City of Perris Planning Division
135 North “D” Street
Perris, California 92570
(951) 943-5003

Hours: Monday – Thursday: 8:00 AM to 6:00 PM.

SECTION 3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

SECTION 4.0 DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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

M Blais — 6-12-19

Signature of Lead Agency Representative — Date

Mary Blais, Contract Planner — City of Perris

Printed name — Agency

SECTION 5.0 INITIAL STUDY

This section contains the Environmental Checklist Form (Form) for the proposed Project. The Form is marked with findings as to the environmental effects of the Project. An "X" in column 1 requires preparation of additional environmental analysis in the form of an EIR.

This analysis has been undertaken, pursuant to the provisions of CEQA, to provide the City of Perris (City) with the factual basis for determining, based on the information available, the form of environmental documentation the Project warrants. The basis for each of the findings listed in the attached Form is explained in the Explanation of Checklist Responses following the checklist.

ENVIRONMENTAL CHECKLIST FORM

City of Perris **135 North "D" Street, Perris,** **California 92570**	
Project Title	IDI Indian Avenue and Ramona Expressway Warehouse Project – MND 18-2342, TPM 37457 (18-05058), DPR 18-00002, & Ag Non-Renewal/Ag-Diminishment 18-05219
Lead Agency Name and Address	City of Perris Planning Division 101North "D" Street Perris, California 92570
Contact Person and Phone Number	Mary Blais, Contract Planner, (951) 943-5003
Project Location	The proposed Project site is located at the northwest corner of Indian Avenue and Ramona Expressway on approximately 24.2 acres, and the off-site improvement area extends east from the northeast portion of the Project site connecting to the intersection of Indian Avenue and Perry Street on approximately 2.64 acres in the City of Perris, California, as depicted on **Figure 1 – Regional Map** and **Figure 2 – Aerial Map**. The Project site is comprised of APNs 302-060-005, 302-060-006, 302-060-038, 302-050-036, and 302-050-034, and the off-site improvement area is comprised of APN 302-060-002 and ROW. The Project site and off-site improvement area is located in Sections 6 and 7 Township 4 South, Range 3 West of the San Bernardino Baseline and Meridian, identified on the Perris, California USGS 7.5 Quadrangle Map as depicted on **Figure 3 – USGS Map**.
Project Sponsor's Name and Address	Steve Hollis, IDI Logistics 840 Apollo Street Suite 100 El Segundo, CA 90245 (949) 351-7243
General Plan Designation	Specific Plan – Perris Valley Commerce Center Specific Plan (PVCCSP) (see **Figure 4**); Light Industrial (LI) in the PVCCSP (see **Figure 6**).
Zoning	Light Industrial (LI) in the PVCCSP (see **Figure 6**) and Airport Overlay.
Description of Project	Refer to Section 2.2 of this document.

City of Perris
135 North "D" Street, Perris,
California 92570

Surrounding Land Uses and Setting

Boundary	General Plan Land Use	Zoning	Specific Plan Land Use	Existing Land Use
Northern	Perris Valley Commerce Center Specific Plan (PVCCSP)	Perris Valley Commerce Center Specific Plan (PVCCSP) and Airport Overlay	Light Industrial (LI)	Mix of vacant land and industrial uses.
Eastern	Perris Valley Commerce Center Specific Plan (PVCCSP)	Perris Valley Commerce Center Specific Plan (PVCCSP) and Airport Overlay	Light Industrial (LI)	Mix of vacant land, non-conforming residential uses, and commercial uses.
Southern	Perris Valley Commerce Center Specific Plan (PVCCSP)	Perris Valley Commerce Center Specific Plan (PVCCSP) and Airport Overlay	Light Industrial (LI)	Mix of vacant land and industrial uses.
Western	Perris Valley Commerce Center Specific Plan (PVCCSP)	Perris Valley Commerce Center Specific Plan (PVCCSP) and Airport Overlay	Light Industrial (LI)	Perris Valley Logistics Center (DPR No. 07-07-0029).

Other public agencies whose approval is required

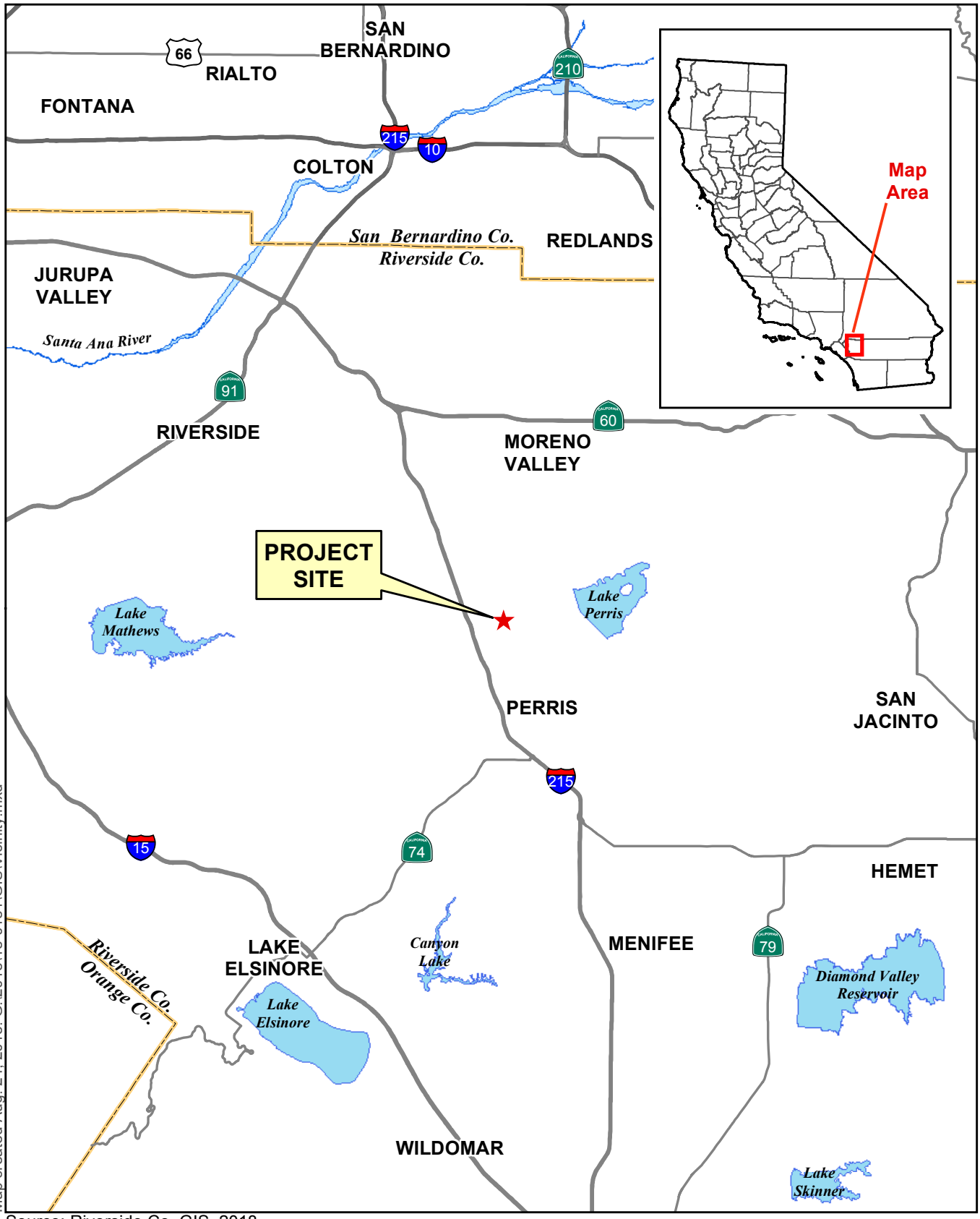
- Eastern Municipal Water District
- Riverside County Flood Control and Water Conservation District
- Regional Water Quality Control Board
- California Department of Fish and Wildlife

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

As part of the MND process, the City of Perris will conduct Assembly Bill (AB) 52 consultation, including contacting the appropriate tribes and meeting with tribes that request consultation.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of

City of Perris **135 North "D" Street, Perris,** **California 92570**	
	Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.



Map created Aug. 24, 2018. G:\2018\18-0181\GIS\Vicinity.mxd

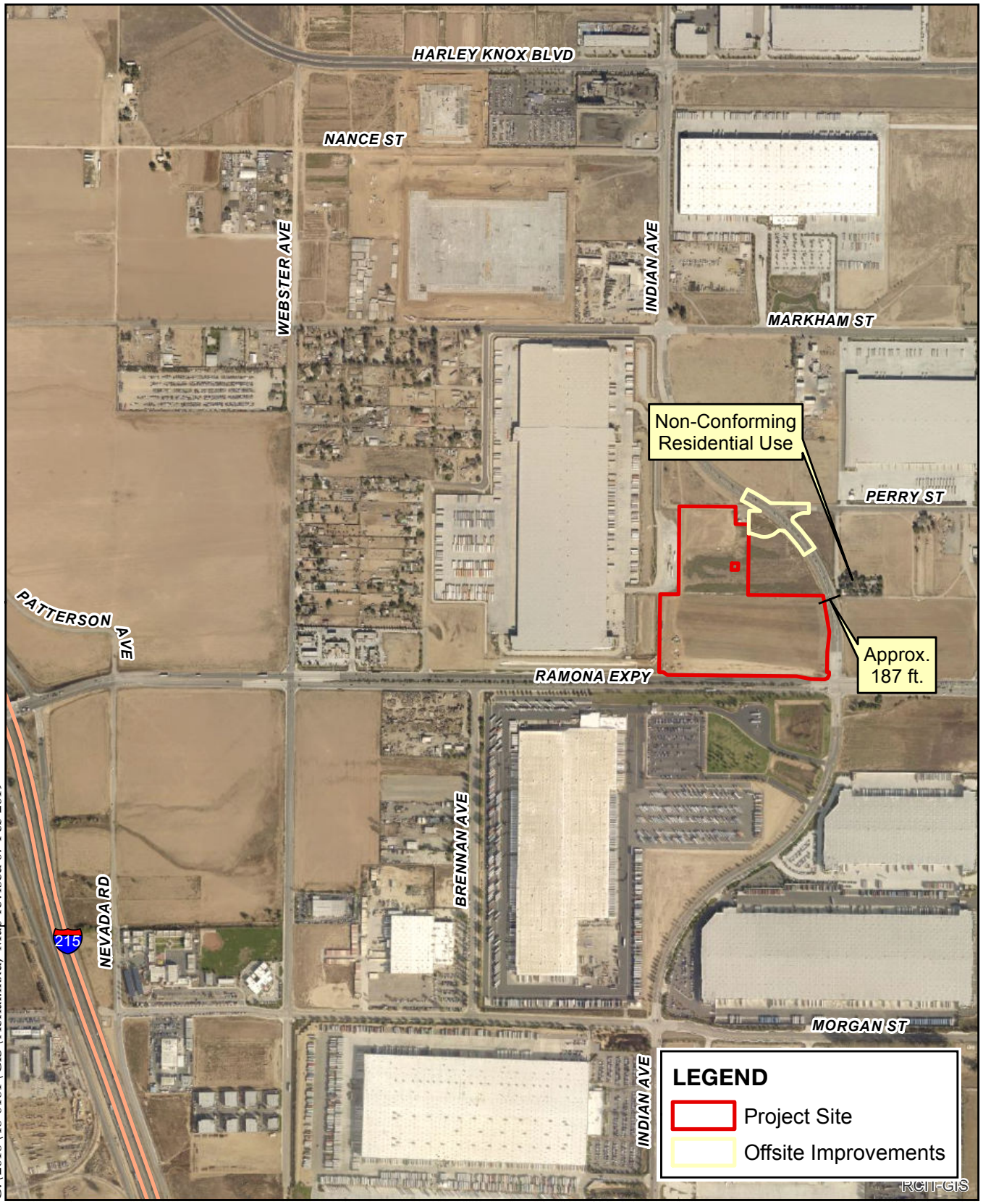
Source: Riverside Co. GIS, 2018

0 2 4 6 Miles

Figure 1 – Regional Map

IDI Indian Avenue and Ramona Expressway Warehouse Project

ALBERT A. WEBB ASSOCIATES



G:\2018\18-0181\GIS\Aerial.mxd; Map revised 07 Feb 2019

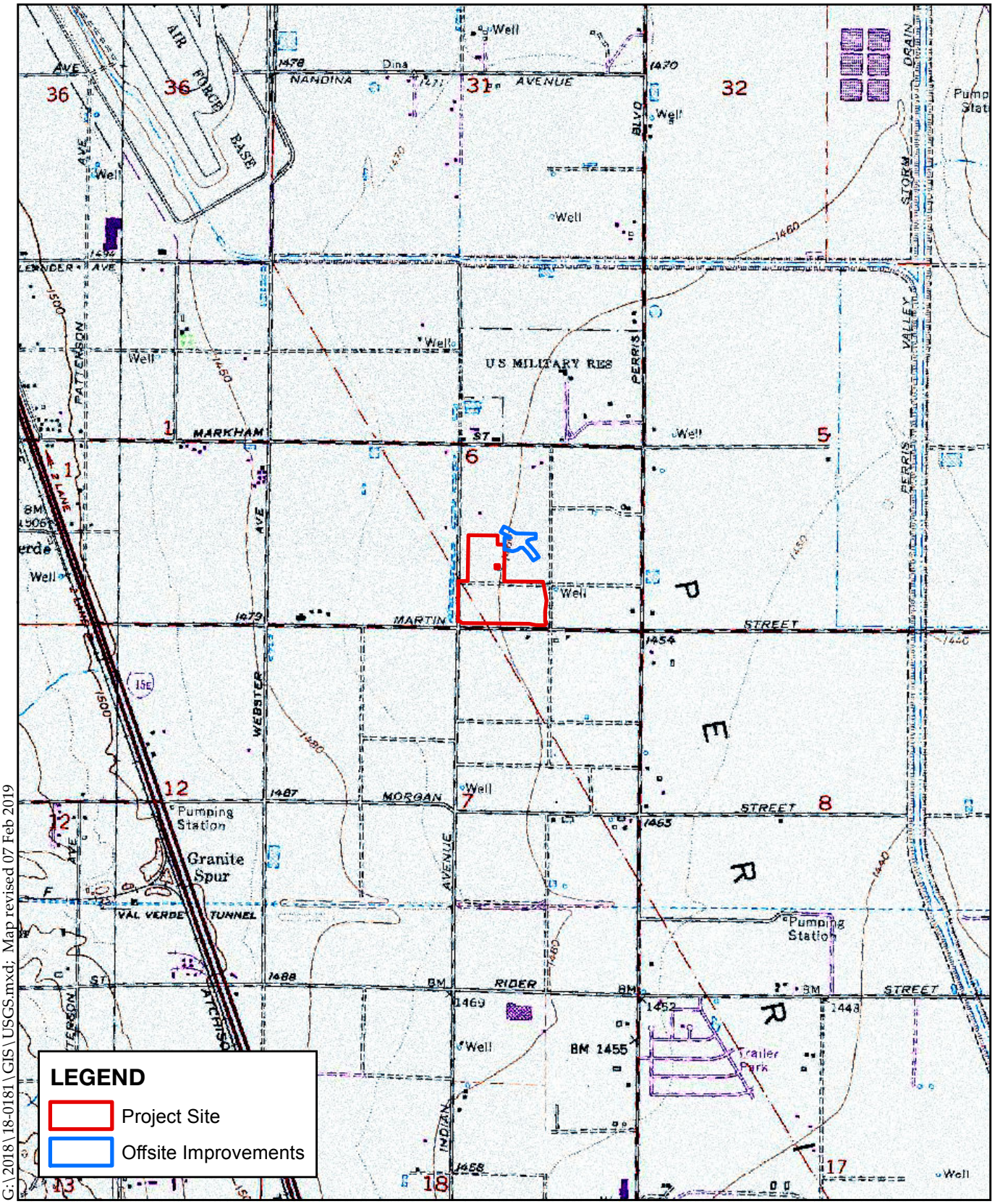
Source: Riverside Co. GIS, 2019 (parcels) and 2016 (imagery).

0 500 1,000 1,500 2,000 Feet

Figure 2 - Aerial Map

IDI Indian Avenue and Ramona Expressway Warehouse Project

ALBERT A. WEBB ASSOCIATES



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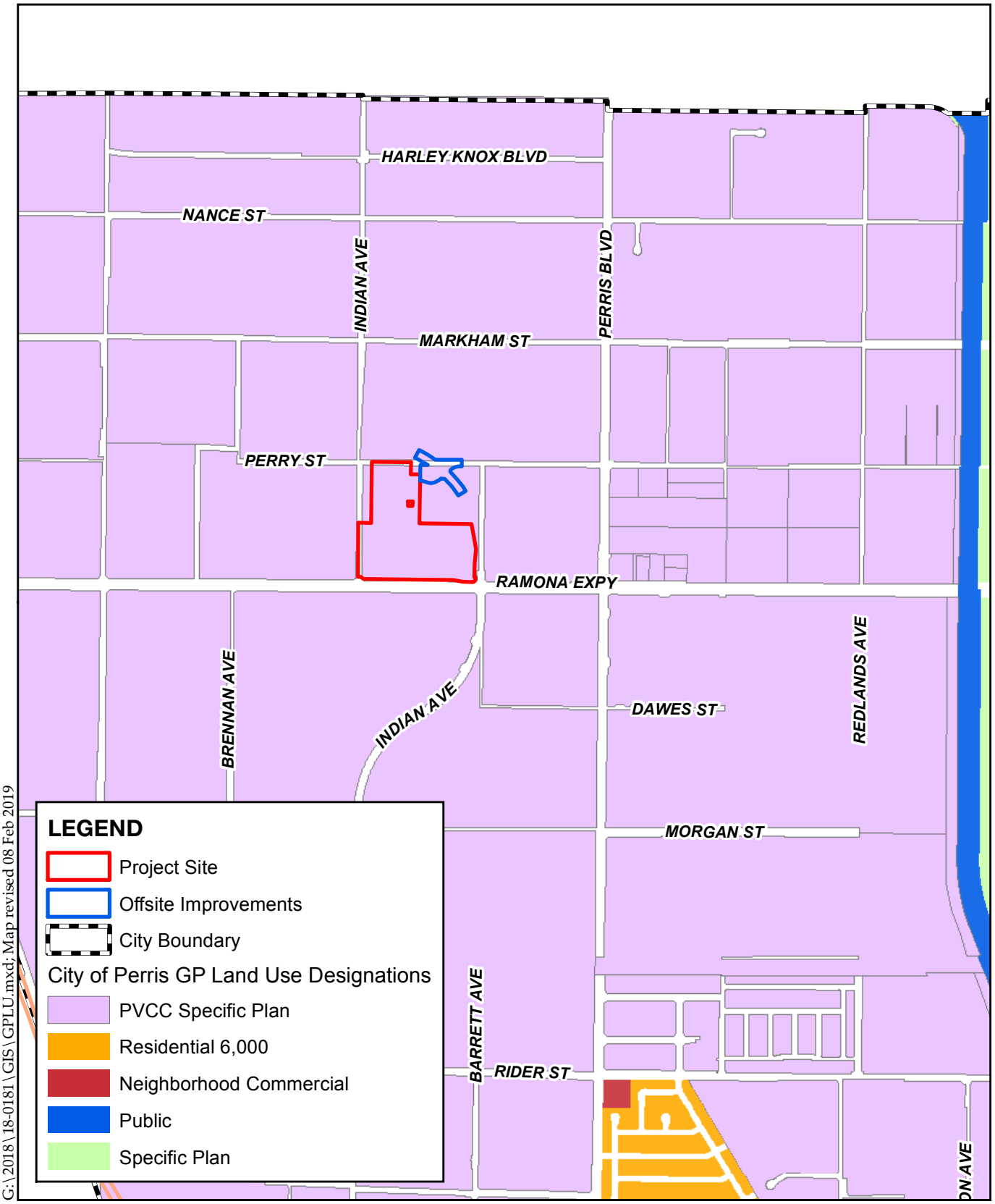
Source: USGS 7.5min Quad
DRG: PERRIS

Figure 3 - USGS Map

IDI Indian Avenue and Ramona Expressway Warehouse Project

ALBERT A. WEBB ASSOCIATES



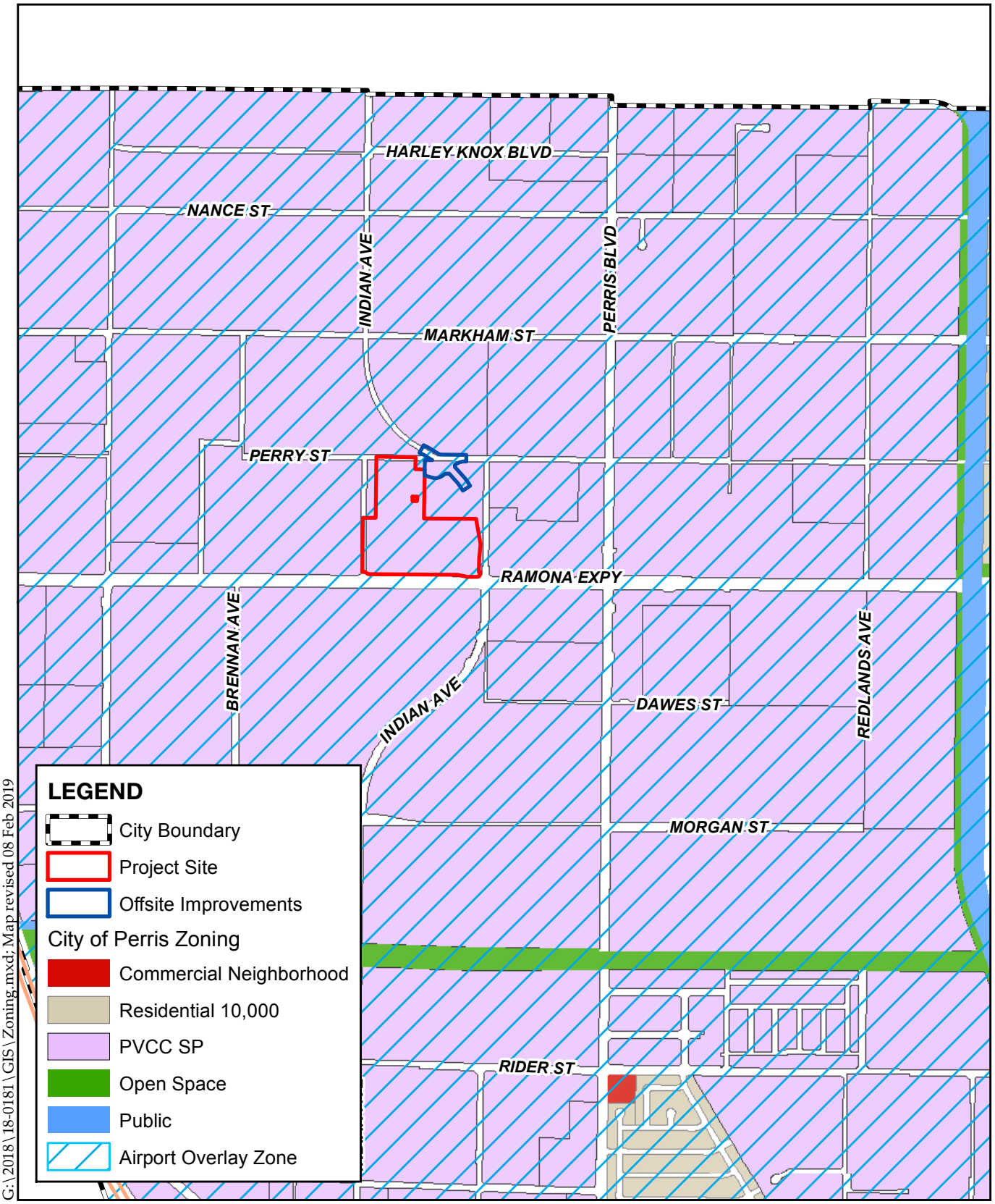
Sources: City of Perris, 2013;
Riverside Co. GIS, 2019.

0 1,000 2,000 3,000 Feet

Figure 4 - General Plan Land Use

IDI Indian Avenue and Ramona Expressway Warehouse Project

ALBERT A. WEBB ASSOCIATES



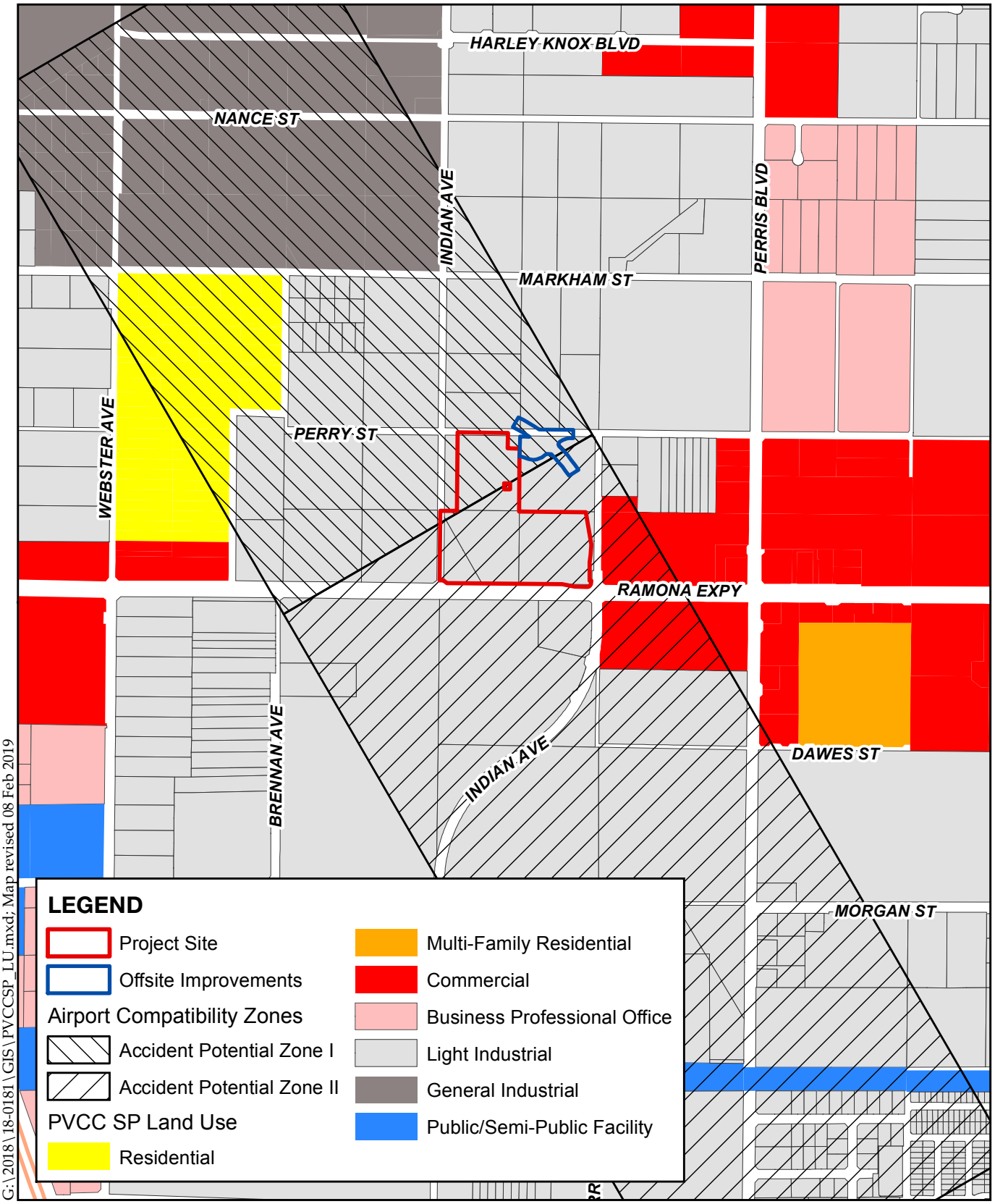
Sources: City of Perris 2017;
Riverside Co. GIS, 2018.

0 1,000 2,000 3,000 Feet

Figure 5 - Zoning

IDI Indian Avenue and Ramona Expressway Warehouse Project

ALBERT A. WEBB ASSOCIATES



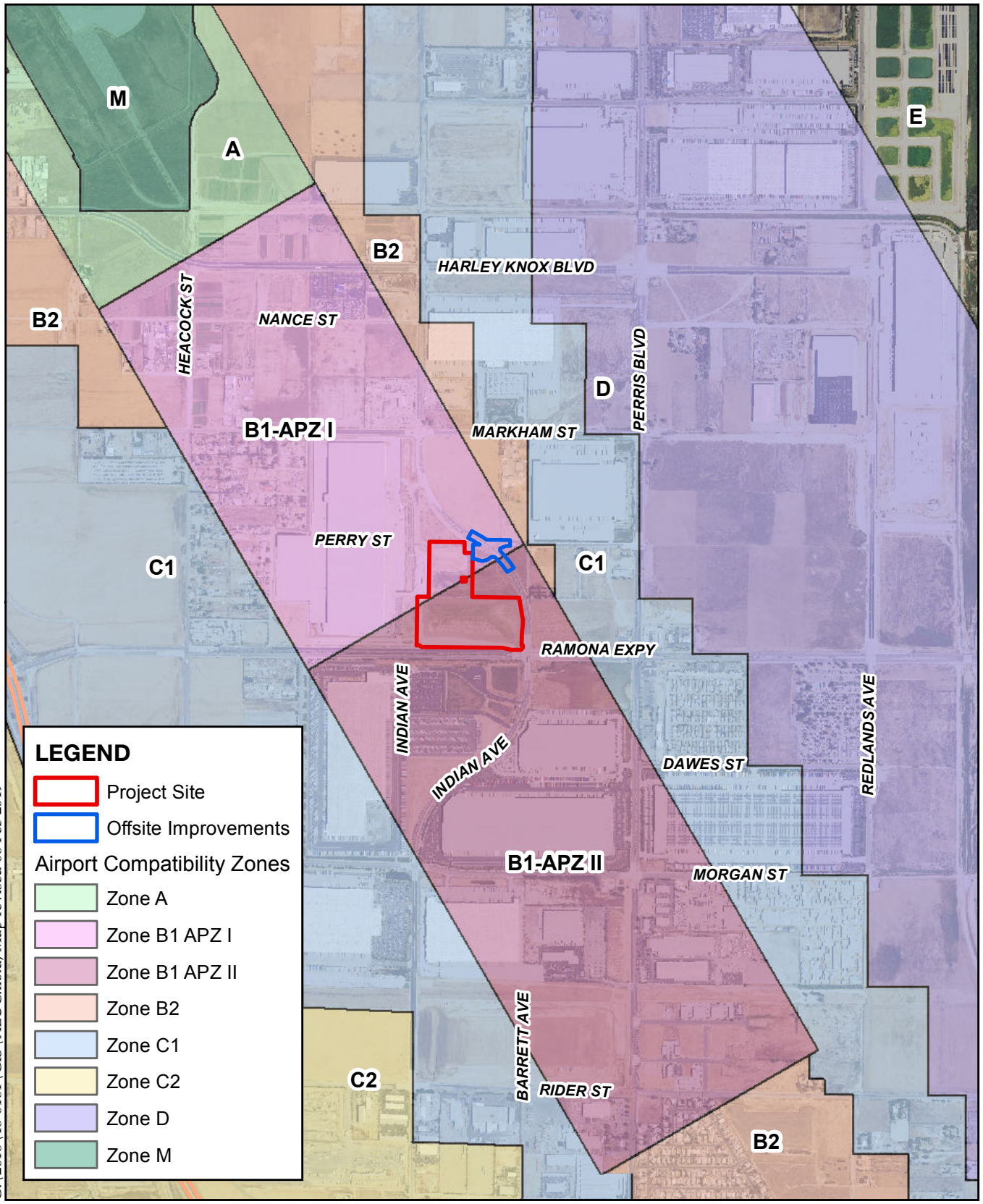
Sources: City of Perris, 2013;
Riverside Co. GIS, 2019.

0 1,000 2,000 Feet

Figure 6 - Specific Plan Land Use

IDI Indian Avenue and Ramona Expressway Warehouse Project

ALBERT A. WEBB ASSOCIATES



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Sources: Riverside Co. GIS/RCALUC 2019; USDA NAIP, 2016.

0 2,000 4,000 Feet

Figure 7 - March Air Reserve Base Compatability and Accident Potential Zones

IDI Indian Avenue and Ramona Expressway Warehouse Project

ALBERT A. WEBB ASSOCIATES

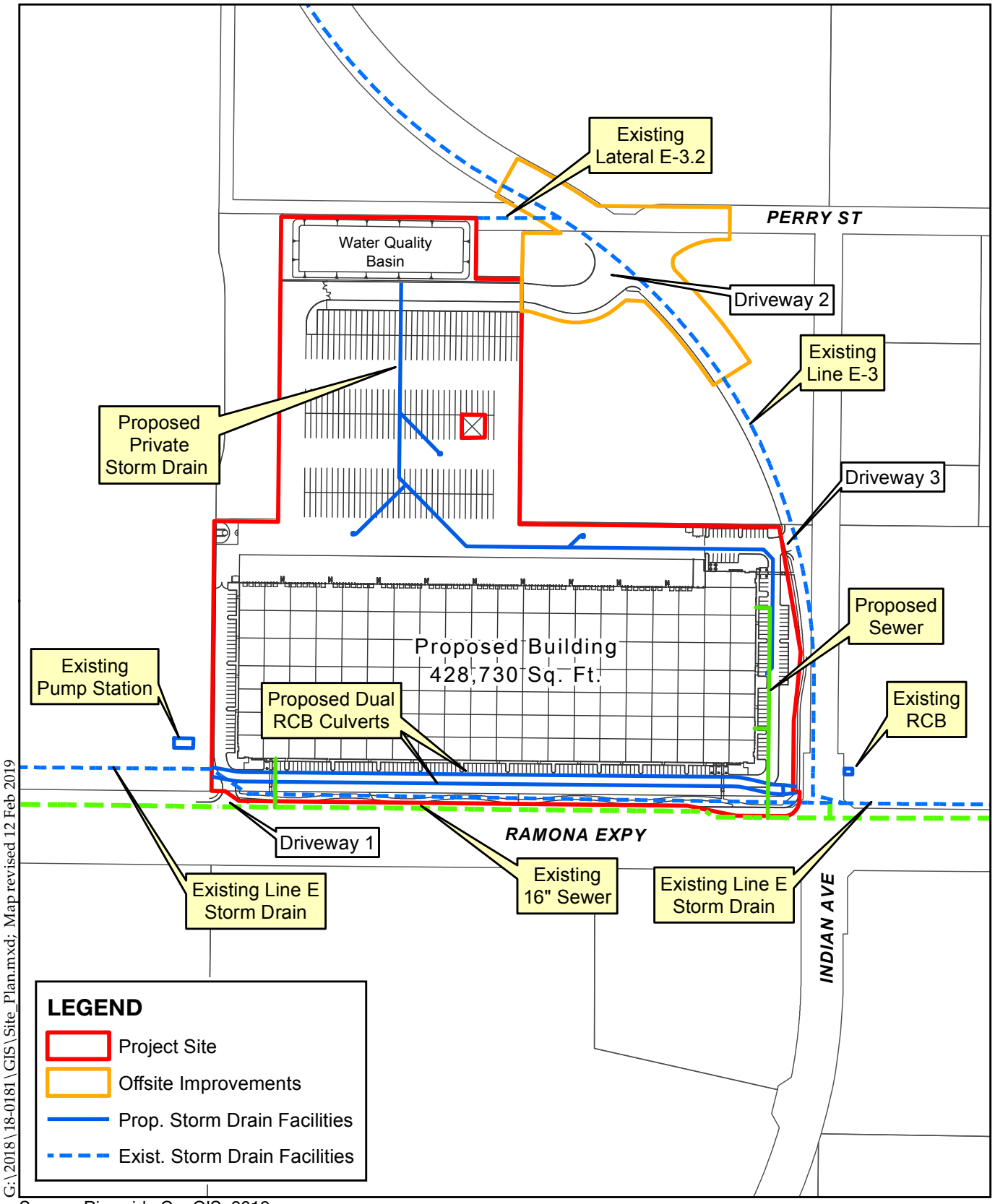
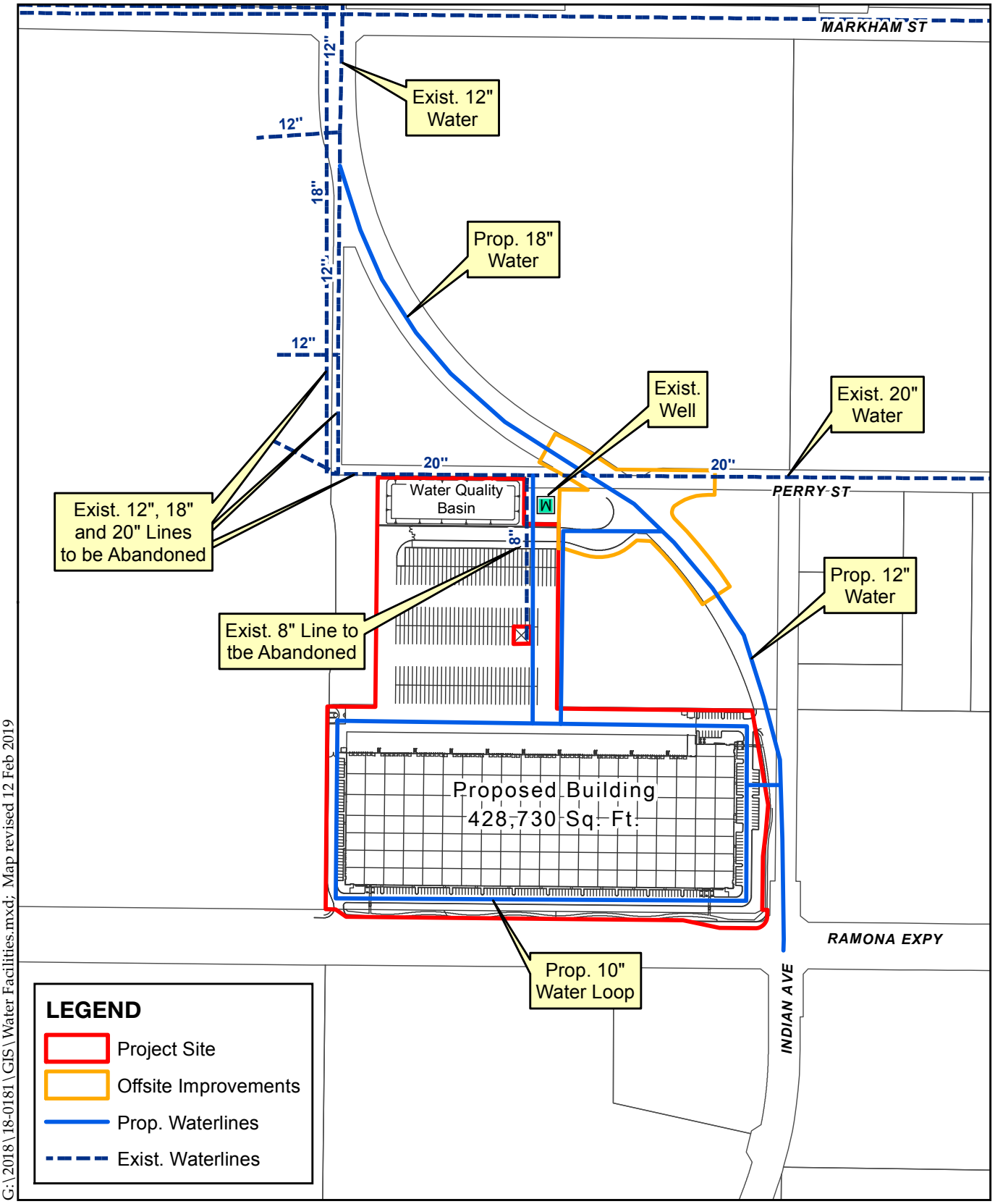


Figure 8 - Proposed Site Plan, Storm Drain Facilities, and Sewer Lines

IDI Indian Avenue and Ramona Expressway Warehouse Project

ALBERT A. WEBB ASSOCIATES



G:\2018\18-0181\GIS\Water Facilities.mxd; Map revised 12 Feb 2019

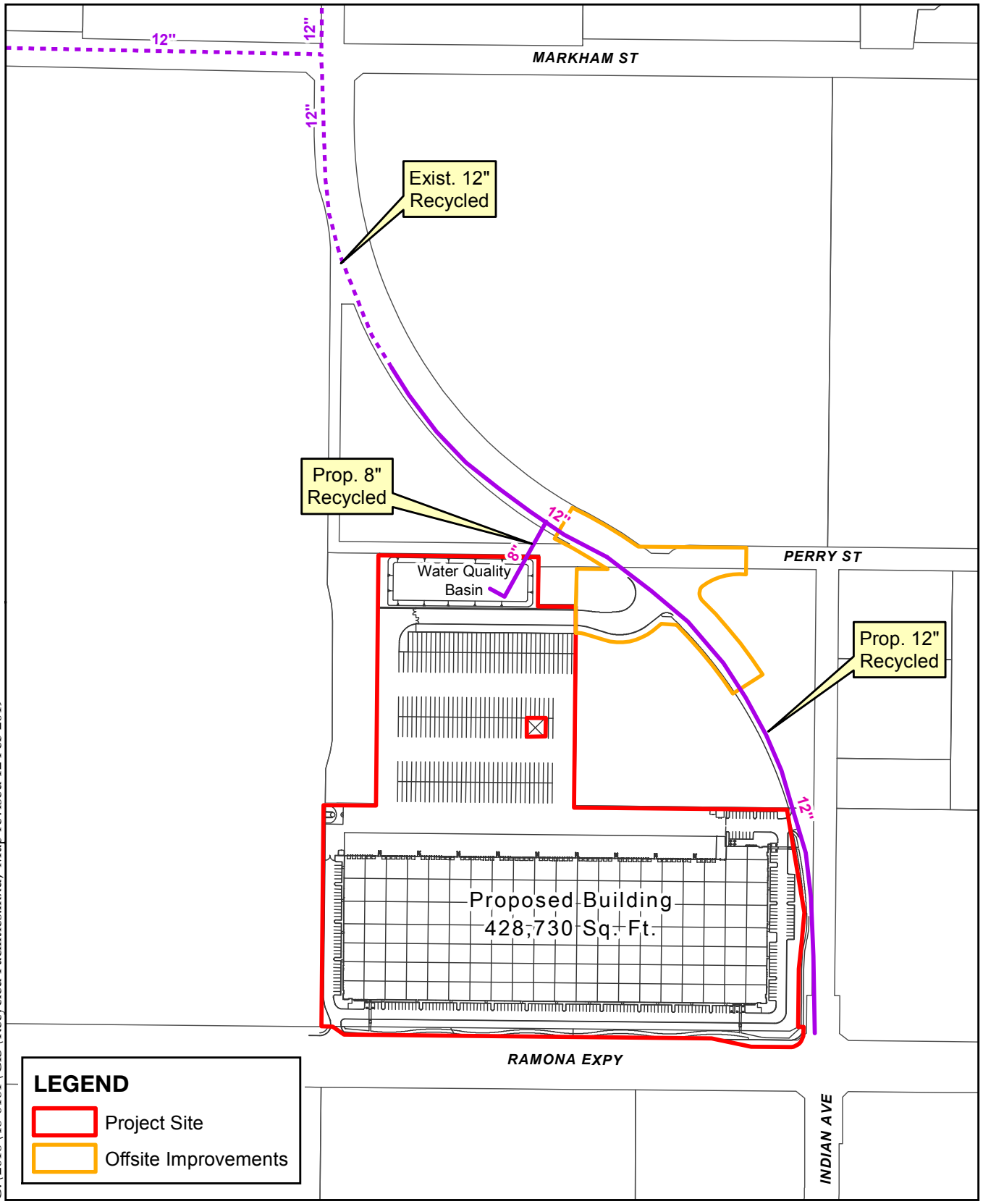
Sources: EMWD, 2017;
Riverside Co. GIS, 2019

0 400 800 Feet

Figure 9 - Water Facilties

IDI Indian Avenue and Ramona Expressway Warehouse Project

ALBERT A. WEBB ASSOCIATES



G:\2018\18-0181\GIS\Recycled Facilities.mxd; Map revised 12 Feb 2019

Sources: EMWD, 2018;
Riverside Co. GIS, 2019

0 400 800 Feet

Figure 10 - Recycled Water Facilties

IDI Indian Avenue and Ramona Expressway Warehouse Project

ALBERT A. WEBB ASSOCIATES

5.1. AESTHETICS	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐

References: Perris 2005b, Perris 2009, Perris 2012, and Perris 2014.

Applicable PVCCSP Standards and Guidelines

The PVCCSP includes Standards and Guidelines relevant to aesthetics/visual character and lighting. These Standards and Guidelines summarized below are incorporated as part of the proposed Project and are assumed in the analysis presented in this section. The chapters/section numbers provided correspond to the PVCCSP chapters/sections. There are no mitigation measures for aesthetics included in the PVCCSP EIR.

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

4.1 Perris Valley Commerce Center On-Site Development Standards

In order to ensure the orderly, consistent, and sensible development of the Perris Valley Commerce Center Specific Plan, land use standards and design criteria have been created for each land use category. A summary of the standards for industrial projects within the Specific Plan area is provided below.

4.2 On-Site Standards and Guidelines

4.2.1 General On-Site Project Development Standards and Guidelines

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

4.2.2 Site Layout for Commerce Zones

- 4.2.2.1 Building Orientation/Placement: Building Frontages/Entrances; Distinct Visual Link; Create Diversity and Sense of Community; and Utilize Building for Screening.

- 4.2.2.5 Screening: Screen Loading Docks; Screening Methods; Screen Outdoor Storage Areas; Work Areas, etc.

- 4.2.2.6 Outdoor Storage: No Outdoor Storage Permitted Other Than as Specified.

- 4.2.2.7 Water Quality Site Design: Best Management Practice (BMP) Features in "Visibility Zone."

4.2.3 Architecture

- 4.2.3.1 Scale, Massing and Building Relief: Scaling in Relationship to Neighboring Structures; Variation in Plane and Form; Project Identity; Do Not Rely on Landscaping; Distinct Visual Link; Break Up Tall Structures; Avoid Monotony; Avoid Long, Monotonous and Unbroken Building Facades; Provide Vertical or Horizontal Offsets; and Fenestration.

- 4.2.3.2 Architectural Elevations and Details: Primary Building Entries; Elements of a Building; Large Sites with Multiple Buildings; Discernible Base, Body and Cap; Visual Relief; and Building Relief.

- 4.2.3.3 Roofs and Parapets: Integral Part of the Building Design; Overall Mass; Varied Roof Lines; Form and Materials; Avoid Monotony; Variation in Parapet Height; Flat Roof and Parapets; and Conceal Roof Mounted Equipment.

- 4.2.3.5 Color and Materials: Facades; Building Trim and Accent Areas; Metal Siding; and High Quality Natural Materials.

4.2.4 Lighting

- 4.2.4.1 General Lighting: Safety and Security; Lighting Fixtures Shield; Foot-candle Requirements Sidewalks/Building Entrances; and Outdoor Lighting.

- 4.2.4.2 Decorative Lighting Standards: Decorative Lights; Complimentary Lighting Fixtures; Monumentation Lighting; Compatible with Architecture; Up-Lighting; Down-Lighting; Accent Lighting; and High Intensity Lighting.

- 4.2.4.3 Parking Lot Lighting: Parking Lot Lighting Required; Foot-candle Requirements Parking Lot; Avoid Conflict with Tree Planting Locations; Pole Footings; and Front of Buildings and Along Main Drive Aisle.

4.2.5 Signage Program

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

4.2.6 Walls/Fences

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

4.2.8 Residential Buffer Development Standards and Guidelines

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

4.2.9 Visual Overlay Zone Development Standards and Guidelines

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

Landscape Standards and Guidelines (from Chapter 6.0 of the PVCCSP)
6.1 On-Site Landscape General Requirements

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

6.1.1 On-Site Landscape Screening

- Plant Screening Maturity.
- Screenwall Painting.
- Trash Enclosures.

6.1.2. Landscape in Parking Lots

- Minimum 50% Shade Coverage.
- Planter Islands.
- Parking Lot Screening.
- One Tree per Six Parking Spaces.
- Concrete Curbs, Mow Strips or Combination.
- Planter Rows Between Opposing Parking Stalls or Diamond Planters.
- Pedestrian Linkages.

6.1.3 On-Site Plant Palette

Industrial Design Standards and Guidelines (from Chapter 8.0 of the PVCCSP)

8.2 Industrial Development Standards and Guidelines

8.2.1 Industrial Site Layout

- 8.2.1.1 Orientation/Placement: Industrial Operations.
- 8.2.1.4 Employee Break Areas and Amenities: Outdoor Break Areas; and Additional Amenities for Buildings Exceeding 100,000 square feet.
- 8.2.1.5 Screening: Truck Courts.

8.2.2 Landscape

- No Landscape in Screened Truck Courts.

Explanation of Checklist Answers

1a. **Less than significant impact.** Scenic vistas can be defined as the view of an area that is visually or aesthetically pleasing. Development projects can potentially impact scenic vistas in two ways: 1) directly diminishing the scenic quality of the vista, or 2) by blocking the view corridors or "vistas" of scenic resources (Perris 2009, p. 19). The proposed Project site and off-site improvement area is currently vacant and undeveloped, with little topographical change and sparse native vegetation. Therefore, the proposed Project site and off-site improvement area itself is not a scenic vista, nor does it currently block or diminish a scenic vista.

The proposed Project site and off-site improvement area is located within the Perris Valley, and the terrain is generally flat. As described in the City's General Plan (GP) 2030 (Perris 2005b, p. VI-2), virtually all building construction consistent with land use development standards will obstruct views of the foothills from at least some vantage points. However, these view corridors extend for miles along current and planned roadways, preserving scenic vistas from the broad basin to the surrounding foothills (Perris 2005b, p. VI-2). The proposed Project involves construction and operation of an approximately 428,730-square-foot warehouse building and the proposed off-site improvements include the construction of Driveway 2, open landscaped area at the southwest corner of West Perry Street and Indian Avenue, and West Perry Street and Indian Avenue intersection improvements (e.g., signal and median), which is consistent with the Light Industrial (LI) land use designation laid out in the City's GP 2030 and the PVCCSP land use plan. The proposed Project is also consistent with the land use development standards contained within the City's GP 2030 and PVCCSP. Furthermore, the proposed Project will be a similar use to the surrounding area as industrial development currently exists to the north, northeast, south, and west of the Project site. Therefore, because the Project site and off-site improvement area is not a scenic vista nor will Project and off-site improvement construction block views of a scenic vista, impacts will be less than significant and no mitigation is required.

1b. **No impact.** According to the City's GP 2030, and as verified in the Project's biological impacts technical report, no notable stands of native or mature trees exist in the City and no impact is associated with development consistent with the GP (Perris 2005b, p. VI-2). Additionally, the IS prepared for the PVCCSP identified no specific scenic resources such as trees, rock outcroppings, or unique features within the Specific Plan area (Perris 2009, p. 19). The closest officially designated State Scenic Highway is Highway 243, located over 20 miles east of the proposed Project site and off-site improvement area (Perris 2009, p. 19). Therefore, because there are no scenic resources within the proposed Project site and off-site improvement area, construction and operation of the proposed Project and off-site improvement area will not substantially damage scenic resources and no impacts are anticipated. No mitigation is required.

1c. **Less than significant impact.** Visual character describes the aesthetic setting of a Project area. The PVCCSP minimizes future conflicts between existing residential uses and neighboring industrial uses by striking an appropriate balance between industrial, commercial, and residential uses (Perris 2012, p. 1-4). All of the parcels immediately surrounding the proposed Project are also designated as Light Industrial (LI) in the PVCCSP and so the proposed Project is consistent with the planned character of the area (Perris 2012, Figure 2-2). Additionally, the proposed Project will be designed according to requirements outlined in the PVCCSP to address visual character, including but not limited to: (1) Chapter 4.0, On-site Design Standards and Guidelines; (2) Chapter 6.0, Landscape Standards and Guidelines; and (3) Chapter 8.0, Industrial Design Standards and Guidelines (Perris 2012, pp. i - iv).

Current land uses surrounding the proposed Project site and off-site improvement area include a mixture of industrial uses, commercial uses, vacant land, and non-conforming residential uses. Therefore, although the proposed Project site will be converted from a vacant lot to a high-cube warehouse and the proposed off-site improvement vacant area will be converted to Driveway 2 access and open landscaped area, this conversion is consistent with existing and planned surrounding

land uses. Therefore, impacts to the visual character of the area due to construction of the proposed Project will be less than significant and no mitigation is required.

1d. **Less than significant impact with mitigation.** Light pollution may result due to introduction of new artificial light sources. The International Dark-Sky Association defines light pollution as any adverse effect of artificial light including sky glow, glare, light trespass, light clutter, decreased visibility at night and energy waste (IDA). Night lighting and glare can affect human vision, navigation, and other activities; however, it can also affect nocturnal wildlife particularly night-hunting or foraging animals, such as owls, rodents, and others. Glare which refers to reflected sunlight or artificial light that interferes with vision or navigation, may also arise from new development; for example, from the use of reflective materials on building exteriors.

Windows are the main source of glare complaints on buildings. The proposed Project will not introduce substantial new daytime glare to the area because the Project site will consist of a concrete tilt-up building with few windows, except in the office areas and the off-site improvement area will consist of Driveway 2, open landscaped area, and West Perry Street and Indian Avenue intersection improvements. The proposed Project will introduce new sources of nighttime light and glare into the area from improved street lighting and additional security lighting at the Project site and off-site area. However, all lighting at the Project site and off-site improvement area will be designed pursuant to Chapter 19.02.110 of the City's Zoning Ordinance, which includes requirements for installation of energy-efficient lighting as well as shielding of parking lot lights to minimize spillover onto adjacent properties and right-of-way (Perris 2014, p. 19.02-8). The proposed Project will also be required to comply with lighting requirements contained in Section 4.2.4 of the PVCCSP, which contains lighting standards for general, decorative, and parking lot lighting. (Perris 2012, p. 31).

During Project construction, nighttime lighting may be used within the construction staging areas to provide security for construction equipment. Due to the distance between the construction area and motorists on adjacent roadways, such security lights may result in glare to motorists. However, this potential impact will be reduced to a less than significant level through the City's standard project review and approval process and with implementation of mitigation measure **MM AES 1**.

Project Mitigation Measures

> **MM AES 1**: Prior to issuance of grading permits, the Project developer shall provide evidence to the City that any temporary nighttime lighting installed for construction and 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.

Through standard City procedures, compliance with City regulations regarding light, and implementation of mitigation measure **MM AES 1**, impacts in regard to the creation of new light and glare will be less than significant and no mitigation is required.

5.2. AGRICULTURE AND FORESTRY RESOURCES	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

References: Perris 2005b, Perris 2011, and FMMP.

Applicable PVCCSP Standards and Guidelines

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

Explanation of Checklist Answers

2a. **No impact.** The Project site and off-site improvement area is identified as Farmland of Local Importance by the Farmland Mapping Management Program (FMMP). The Project site is not being used for agricultural production. Per Section 21060.1 of the *CEQA Guidelines*, Farmland of Local Importance is not considered Farmland. Because there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance at the Project site, there will not be any new significant impacts related to conversion of Farmland. No impacts will occur and no mitigation is required.

2b. **Less than significant impact.** The PVCCSP EIR noted that the PVCCSP area contained 29 parcels with active Williamson Act contracts, of which the southern portion of the Project site is within a Williamson Act contract. The PVCCSP proposed non-agricultural land uses within these areas that have active Williamson Act contracts. The PVCCSP EIR noted that development of affected agricultural preserve properties will be required to comply with the regulatory requirements of the Williamson Act, as implemented by the City (City of Perris 2011, p. 4.1-5).

Section 6.2 (Issues Found Not To Be Significant, Agricultural Resources) of the City's GP EIR determined that the City's GP had no impacts related to a conflict with existing zoning for agricultural uses, or a Williamson Act Contract. The basis

provided in the City's GP EIR for this determination is that, "The 1991 General Plan Land Use Element redesignated all agricultural lands for uses other than agriculture. Remaining land zoned for agricultural use is subject to a Williamson Act contract for which a notice of non-renewal has been filed indicating that the land will be taken out of agricultural production. Adoption and implementation of General Plan 2030 will have no impact on the non-renewal." (City of Perris 2011, p. 4.1-7).

The proposed Project site and off-site improvement area is within a PVCCSP land use designation of Light Industrial (LI). Although the Project site is not being used for agricultural production, there is a recorded agricultural preserve that exists on the Project site. An application for Agricultural Diminishment and Notice of Nonrenewal has been submitted to the City for review and approval to cancel the Williamson Act Contract for the property. The application for Agricultural Diminishment will remove the Agricultural Preserve Program from the land. The Project applicant is required to comply with the State of California's established steps for removal of this site from the Contract. Based on the above discussion, implementation of the proposed Project will not conflict with an existing zoned agricultural use nor a Williamson Act Contract. Impacts are considered to be less than significant and no mitigation is required.

2c. **No impact.** The City has zoned the Project site and off-site improvement area PVCCSP with a PVCCSP land use designation of Light Industrial (LI). There are no existing or proposed zoning of forest land, timberland, or Timberland Production Zones within the City; thus, there is no commercial forestry or timber production industry within the City. Therefore, implementation of the proposed Project would have no impact on forest land, timberland, or a Timberland Production Zone. No mitigation is required.

2d. **No impact.** As discussed in *Threshold 2c* above, there is no land zoned forest land within the County of Riverside or the City. Therefore, implementation of the proposed Project will have no impact on land zoned for forest land and will not result in the conversion of forest land to non-forest uses. No impacts would occur and no mitigation is required.

2e. **No impact.** As described in *Thresholds 2a-2d* above, the Project site and off-site improvement area is not categorized as Prime Farmland, Unique Farmland or Farmland of Statewide Importance nor is the site designated as forest land. Therefore, implementation of the Project will not result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. No impacts would occur and no mitigation is required.

5.3. AIR QUALITY	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

References: Perris 2005a, Perris 2012, SCAQMD 2008, SCAQMD 2016, Urban Crossroads 2018 (revised 2019) (Appendix A), Urban Crossroads 2018 (Appendix B), and Urban Crossroads 2019 (Appendix C).

Applicable PVCCSP Standards and Guidelines

The PVCCSP includes Standards and Guidelines relevant to the analysis of air quality impacts presented in this IS and summarized below are incorporated as part of the proposed Project; as such, they are assumed in the analysis presented in this section.

Residential Buffer Development Standards and Guidelines (Section 4.2.8)

- 50-foot setback. A 50-foot setback is required for commercial, industrial, and business professional office developments immediately abutting existing residential property lines.

The PVCCSP EIR mitigation measures related to air quality that are applicable to the proposed Project are incorporated in the following analysis.

Explanation of Checklist Answers

3a. **Less than significant impact.** The City is located within the South Coast Air Basin ("the Basin"), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD has prepared the 2016 Air Quality Management Plan (AQMP) for the Basin to establish a comprehensive program to lead the Basin into compliance with all Federal and State air quality standards (SCAQMD 2016). The control measures and related emission reduction estimates included in the AQMP are based upon emissions projections for a future development scenario derived from land use, population, and employment estimates defined in consultation with local governments. Accordingly, if a project demonstrates compliance with local land use plans and/or population projections, then the AQMP would have taken into account such uses when it was developed and the project would not conflict with implementation of such a plan.

The proposed Project site and off-site improvement area is within the City's PVCCSP area and is designated as Light Industrial (LI) in this document as well as in the City's GP 2030 (see **Figures 4-6**). This land use designation is also consistent with the proposed Project site's and off-site improvement area's light industrial zoning in the City's Zoning Code. The Project applicant proposes to operate the facility as a high-cube, non-refrigerated warehouse facility, which is allowed under the Light Industrial (LI) land use designation. Therefore, the air pollutant emissions with this amount of development at the Project site would have been accounted for in SCAQMD's AQMP.

Population and employment estimates for the City are compiled by the Southern California Association of Governments (SCAG) in its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The population and employment projections in the RTP/SCS are based on information gathered from cities within SCAG's jurisdiction. Hence, because the proposed Project is consistent with the land use designation in the PVCCSP and City's GP 2030, employment and population estimates associated with implementation of the proposed Project would have also been accounted for in SCAG's RTP/SCS. Therefore, because the proposed Project is compliant with local and use plans and population projections, the proposed Project would not conflict with or obstruct implementation of the AQMP and impacts will be less than significant. No mitigation is required.

3b. **Less than significant impact with mitigation.** Air quality impacts can be described in short- and long-term perspective. Short-term impacts occur during site preparation, grading, paving, and Project construction and consist of fugitive dust and other particulate matter, as well as exhaust emissions generated by construction-related vehicles. Long-term air quality impacts are associated with Project operation.

Construction Activities

The proposed Project will be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. Compliance with this rule is achieved through application of standard best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour, sweeping loose dirt from paved site access driveways, cessation of construction activity when winds exceed 25 miles per hour and establishing a permanent, stabilizing ground cover on finished sites. In addition, projects that disturb five or more acres of soil or move 5,000 cubic yards of materials per day are required to submit a Fugitive Dust Control Plan or a Large Operation Notification Form to SCAQMD. Based on the size of this Project's disturbance area (less than five acres per day), a Fugitive Dust Control Plan or Large Operation Notification Form would not be required.

An Air Quality Impact Analysis was prepared for the Project by Urban Crossroads dated November 1, 2018 and revised February 13, 2019 (Appendix A). Short-term emissions from construction activities were evaluated using the CalEEMod version 2016.3.2 program. Construction impacts modeled were anticipated to commence in January 2019 and will last through August 2020. The construction schedule utilized in the air quality analysis, shown in **Table 5.3-A – Construction Duration**, represents a "worst-case" analysis scenario should construction occur any time after

the January 2019 since emission factors for construction decrease as time passes and the analysis year increase due to emission regulations becoming more stringent. The duration of construction activity was based upon information provided by the Project applicant and a 2020 opening year. Based on consultation with the Project applicant, the Project site is expected to require 10,000 cubic yards of soil import. This analysis includes the projected impacts associated with an importation of 10,000 cubic yards of soil. A CalEEMod default 20-mile one-way trip length for hauling activity was used since the borrow site is unknown at this time.

Construction emissions from construction worker vehicles traveling to and from the Project site and from the off-site improvement area, as well as vendor trips (construction materials delivered to the Project site and off-site improvement area) were estimated based on information from the Project applicant and the CalEEMod model.

Table 5.3-A – Construction Duration

Construction Activity	Start Date	End Date	Total Working Days
Site Preparation	January 1, 2019	January 14, 2019	10 days
Grading	January 15, 2019	March 4, 2019	35 days
Building Construction	March 5, 2019	August 3, 2020	370 days
Architectural Coating	July 7, 2020	August 31, 2020	40 days
Paving	August 4, 2020	August 31, 2020	20 days

Source: Urban Crossroads 2018 (revised 2019), Table 3-2 (Appendix A).

A detailed summary of construction equipment anticipated for the Project is shown in **Table 5.3-B – Construction Equipment**.

Table 5.3-B – Construction Equipment

Construction Activity	Off-Road Equipment	Unit Amount	Hours Per Day
Site Preparation	Crawler Tractors	4	8
	Rubber Tired Dozers	3	8
Grading	Crawler Tractors	2	8
	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
Building Construction	Cranes	1	8
	Crawler Tractors	3	8
	Forklifts	3	8
	Generator Sets	1	8
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coatings	Air Compressors	1	8

Source: Urban Crossroads 2018 (revised 2019), Table 3-3 (Appendix A).

The estimated maximum daily construction emissions are summarized in **Table 5.3-C, Maximum Daily Peak Construction Emissions Summary (With No Mitigation Except for the Required PVCCSP Mitigation)**. It should be noted that the Project is required to comply with the applicable PVCCSP EIR mitigation measures **MM Air 1 through MM Air 10**.

Table 5.3-C – Maximum Daily Peak Construction Emissions Summary (With No Mitigation Except for the Required PVCCSP Mitigation)

Year	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_2	PM-10	PM-2.5
2019	6.69	75.12	42.78	0.14	11.05	6.75
2020	58.81	58.55	46.06	0.15	9.06	3.73
Maximum Daily Emissions	**58.81**	**75.12**	**42.78**	**0.15**	**11.05**	**6.75**
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Urban Crossroads 2018 (revised 2019), Table 3-4 (Appendix A).

As shown in **Table 5.3-C**, Project construction-source emissions would not exceed the numerical thresholds of significance established by the SCAQMD for any criteria pollutant. As such, air quality impacts related to construction activities are considered to be less than significant and no additional mitigation is required beyond those required by the PVCCSP EIR mitigation measures **MM Air 1 through MM Air 10**.

PVCCSP Mitigation Measures

PVCCSP MM Air 1: To identify potential implementing development project-specific impacts resulting from construction activities, proposed development projects that are subject to CEQA shall have construction-related air quality impacts analyzed using the latest available URBEMIS model, or other analytical method determined in conjunction with the SCAQMD. The results of the construction-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Threshold analysis or other appropriate analyses as determined in conjunction with SCAQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.[2]

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

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

- requiring the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain),
- keeping disturbed/loose soil moist at all times,
- requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered,

[2] MM Air 1 has been completed with the preparation of the Air Quality Impact Analysis by Urban Crossroads (2018) for this Project and is summarized under the applicable Section 5.3 threshold questions.

- installation of wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip,
- posting and enforcement of traffic speed limits of 15 miles per hour or less on all unpaved potions of the project site,
- suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 miles per hour,
- appointment of a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM-10 generation,
- sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks when sweeping streets to remove visible soil materials, and
- replacement of ground cover in disturbed areas as quickly as possible.

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

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

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

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

PVCCSP MM Air 8: Each individual implementing development project shall apply paints using either high volume low pressure (HVLP) spray

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

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

PVCCSP MM Air 10: To identify potential implementing development project-specific impacts resulting from operational activities, proposed development projects that are subject to CEQA shall have long-term operational-related air quality impacts analyzed using the latest available URBEMIS model, or other analytical method determined by the City of Perris as lead agency in conjunction with the SCAQMD. The results of the operational-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Threshold analysis, CO Hot Spot analysis, or other appropriate analyses as determined by the City of Perris in conjunction with SCAQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.[3]

Operational Activities

Long-term operational emissions are evaluated for Project buildout. The Project is assumed to be operational in 2020. Mobile source emissions refer to on-road motor vehicle emissions at Project buildout, which include passenger vehicles and delivery trucks. These emissions are estimated by using the trip generation rates provided in the Project-specific Traffic Impact Analysis (TIA) (Urban Crossroads, Appendix N). For passenger car trips, the Riverside County CalEEMod default for a one-way trip length of 16.6 miles was assumed. For heavy duty trucks, Light-Heavy-Duty (LHD)/2-axle, Medium-Heavy-Duty (MHD/3-axle, and Heavy-Heavy-Duty (HHD)/4+-axle trucks would travel a distance of 60 miles (Urban Crossroads p. 42, Appendix N).

Area source emissions include stationary combustion emissions of natural gas used for space and water heating, yard and landscape maintenance (assumed to occur throughout the year in Southern California). CalEEMod computes area source emissions based upon default factors and land use assumptions. The CalEEMod defaults for energy use reflect the increased stringency of the 2016 Building Energy Efficiency Standards.

[3] MM Air 10 has been completed with the preparation of the Air Quality Impact Analysis by Urban Crossroads (2018, revised 2019) for this Project and is summarized under the applicable Section 5.3 threshold questions.

Project-related operational emissions were computed and the results are presented below in **Table 5.3-D – Maximum Operational Emissions Summary (Summer)** and **Table 5.3-E – Maximum Operational Emissions Summary (Winter)**.

Table 5.3-D – Maximum Operational Emissions Summary (Summer)

Operational Activities	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_2	PM-10	PM-2.5
Area Source	9.89	4.2E-04	0.05	--	1.6E-04	1.6E-04
Energy Source	0.03	0.23	0.20	1.40E-03	0.02	0.02
Mobile	2.04	48.49	30.96	0.25	15.08	4.34
Maximum Daily Emissions	**11.95**	**48.72**	**31.20**	**0.25**	**15.10**	**4.35**
SCAQMD Regional Threshold	55	55	550	150	150	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Urban Crossroads 2018 (revised 2019), Table 3-5 (Appendix A).
Note: Totals obtained from CalEEMod and may not total 100% due to rounding.

Table 5.3-E – Maximum Operational Emissions Summary (Winter)

Operational Activities	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_2	PM-10	PM-2.5
Area Source	9.89	4.2E-04	0.05	--	1.6E-04	1.6E-04
Energy Source	0.03	0.23	0.20	1.40E-03	0.02	0.02
Mobile	1.92	49.68	26.86	0.24	15.09	4.34
Maximum Daily Emissions	**11.84**	**49.91**	**27.10**	**0.24**	**15.10**	**4.36**
SCAQMD Regional Threshold	55	55	550	150	150	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Urban Crossroads 2018 (revised 2019), Table 3-5 (Appendix A).
Note: Totals obtained from CalEEMod and may not total 100% due to rounding.

As shown on **Table 5.3-D** and **Table 5.3-E**, maximum operational emissions from implementation of the proposed Project would not exceed the numerical thresholds of significance established by the SCAQMD for any criteria pollutant. As such, air quality impacts related to operational activities are considered to be less than significant and no additional mitigation is required beyond those required by the PVCCSP EIR mitigation measures **MM Air 11, MM Air 13 through MM 15, and MM Air 18 through MM Air 20**.

PVCCSP Mitigation Measures

PVCCSP MM Air 11: Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of five minutes.

PVCCSP MM Air 13: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall

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

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

PVCCSP MM Air 15: To identify potential implementing development project-specific impacts resulting from the use of diesel trucks, proposed implementing development projects that include an excess of 10 dock doors for a single building, a minimum of 100 truck trips per day, 40 truck trips with TRUs [Transport Refrigeration Units] per day, or TRU operations exceeding 300 hours per week, and that are subject to CEQA and are located adjacent to sensitive land uses; shall have a facility-specific Health Risk Assessment performed to assess the diesel particulate matter impacts from mobile-source traffic generated by that implementing development project. The results of the Health Risk Assessment shall be included in the CEQA documentation for each implementing development project.[4]

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

PVCCSP MM Air 19: In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g.,

[4] MM Air 15 has been completed with the preparation of the Health Risk Assessment by Urban Crossroads (2018) for this Project and is summarized under the applicable Section 5.3 threshold questions.

electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the Project site. These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris' Building Division) prior to conveyance of applicable streets.

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

3c. **Less than significant impact.** The portion of the Basin within which the proposed Project site and off-site improvement area is located is designated as a non-attainment area for ozone, particulate matter less than 10 microns in diameter (PM-10), and particulate matter less than 2.5 microns in diameter (PM-2.5) under the State standards and in a non-attainment area for ozone, PM-2.5, and partial nonattainment for lead under the Federal standards (Urban Crossroads p. 17, Appendix A). The SCAQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same. These thresholds apply to individual development projects only; they do not apply to the cumulative emissions generated by a group of related projects. The proposed Project would contribute criteria pollutant to the area that may be under construction simultaneously with the proposed Project. Depending on construction schedules and actual implementation of projects in the area, generation of fugitive dusts and pollutant emissions during construction could result in substantial short-term increases in air pollutants. However, each project would be required to comply with the SCAQMD's standard construction measures.

As discussed in *Threshold 3b* above, the proposed Project's short-term construction emissions would not exceed the SCAQMD significance thresholds. Therefore, the proposed Project would not have a significant short-term cumulative impact. Additionally, the proposed Project's operational emissions would not exceed the SCAQMD significance thresholds. Therefore, the proposed Project would not have a significant long-term cumulative impact. Thus, the Project net increase in criteria pollutant emissions for which the Project region is non-attainment is not cumulatively considerable.

3d. **Less than significant impact with mitigation.** Staff at the SCAQMD has developed localized significance threshold (LST) methodology that can be used by public agencies to determine whether or not a project may generate significant adverse localized air quality impacts (both short-term and long-term). Short-term emissions include on-site construction emissions.

LSTs are applicable to nitrogen oxides (NO_x), carbon monoxide (CO), PM-10, and PM-2.5 and represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable Federal or State ambient air quality standard on sensitive receptors (SCAQMD 2008). According to the SCAQMD *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, sensitive receptors within the Basin include residential uses, school playgrounds, childcare facilities, athletic facilities, hospitals, retirement homes, and convalescent homes (SCAQMD 2005, p. 2-1).

Construction-Source Emissions LST Analysis

The LST thresholds are estimated using the maximum daily disturbed area (in acres) and the distance of the Project site and off-site improvement area to the nearest sensitive receptors (in meters). The closest sensitive receptor (non-conforming residential use) is located approximately 187 feet east of the Project site, across from Indian Avenue (see **Figure 2**). The proposed Project is anticipated to disturb approximately 3.5 acres per day during the site preparation phase and approximately 4.0 acres per day during the grading phase of Project construction activities. The acres disturbed is based on the equipment list identified in **Table 5.3-B** of this document and days in site preparation or grading phase (refer to **Table 5.3-A**) according to the anticipated maximum number of acres a given piece of equipment can pass over in an 8-hour workday. Since the total acreage disturbed is less than five acres per day for the site preparation phase and grading phase, the SCAQMD's screening look-up tables are utilized in determining impacts. It should be noted that since the look-up tables identifies thresholds at only 1 acre, 2 acres, and 5 acres, linear regression has been utilized, consistent with SCAQMD guidance, in order to interpolate the threshold values for the other disturbed acreage and distances not identified in the look-up tables. Liner regression, as recommended by SCAQMD has been utilized to interpolate the thresholds at the 187 feet/57 meters receptor distance since the look-up tables identifies thresholds at 25 meters, 50 meters, 100 meters, 200 meters, and 500 meters. **Table 5.3-F – Localized Significance Summary of Construction** identifies the localized impacts at the nearest receptor location in the vicinity of the Project. It should be noted that the Project is required to comply with the applicable PVCCSP EIR mitigation measures as identified in Section 5.3 Applicable PVCCSP Standards and Guidelines.

Table 5.3-F – Localized Significance Summary of Construction

On-Site Preparation Emissions	Emissions (pounds per day)			
	NO_X	CO	PM-10	PM-2.5
Maximum Daily Emissions	**68.19**	**23.17**	**10.85**	**6.69**
SCAQMD Localized Threshold	220	1,230	33	9
Exceeds Threshold?	**No**	**No**	**No**	**No**
On-Site Grading Emissions	**Emissions (pounds per day)**			
	NO_X	**CO**	**PM-10**	**PM-2.5**
Maximum Daily Emissions	**65.83**	**33.93**	**6.48**	**3.91**
SCAQMD Localized Threshold	237	1,345	36	9
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: Urban Crossroads 2018 (revised 2019), Table 3-7 (Appendix A).

As shown on **Table 5.3-F**, Project construction-source emissions would not exceed the numerical thresholds of significance established by the SCAQMD for any criteria pollutant. Thus, a less than significant impact would occur for Project-related construction-source emissions and no additional mitigation is required beyond those required by the PVCCSP EIR mitigation measures **MM Air 1 through MM Air 10**.

Localized Significance – Long-Term Operational Activity

Table 5.3-G – Localized Significance Summary of Operations, identifies the emissions for the Project's operational activities compared with the applicable LSTs.

Table 5.3-G – Localized Significance Summary of Operations

Operational Activity	Emissions (pounds per day)			
	NO_X	CO	PM-10	PM-2.5
Maximum Daily Emissions	**2.71**	**1.80**	**0.77**	**0.24**
SCAQMD Localized Significance Threshold	270	1,577	11	3
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: Urban Crossroads 2018 (revised 2019), Table 3-8 (Appendix A).

As shown on **Table 5.3-G**, Project operational-source emissions would not exceed the numerical thresholds of significance established by the SCAQMD for any criteria pollutant. Thus, a less than significant impact would occur for Project-related operational-source emissions and no additional mitigation is required beyond those required by the PVCCSP EIR mitigation measures **MM Air 11, MM Air 13 through MM 15, and MM Air 18 through MM Air 20**.

CO "Hot Spot" Analysis

An adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. At the time of the 1993 Handbook, the SCAB was designated nonattainment under the California Ambient Air Quality Standards and National Ambient Air Quality Standards for CO (Urban Crossroads p. 50, Appendix A).

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO "hot spot" analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This "hot spot" analysis did not predict any violation of CO standards, as shown on **Table 5.3-H – CO Model Results**.

Table 5.3-H – CO Model Results

Intersection Location	Carbon Monoxide Concentrations (parts per million)		
	Morning 1-hour	Afternoon 1-hour	8-hour
Wilshire-Veteran	4.6	3.5	3.7
Sunset-Highland	4	4.5	3.5
La Cienega-Century	3.7	3.1	5.2
Long Beach-Imperial	3	3.1	8.4

Source: Urban Crossroads 2018 (revised 2019), Table 3-9 (Appendix A).

Based on the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for CO (1992 CO Plan), peak carbon monoxide concentrations in the SCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, for example, 8.4 ppm CO concentration measured at the Long Beach Boulevard and Imperial Highway intersection (highest CO generating intersection within the "hot spot" analysis), only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 7.7 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. Therefore, even if the traffic volumes for the proposed Project were double or even triple of the traffic volumes generated at the Long Beach Boulevard and Imperial Highway intersection, coupled with the on-going improvements in ambient air quality, the Project would not be capable of resulting in a CO "hot spot" at any study area intersections (Urban Crossroads, p. 51, Appendix A).

Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact (Urban Crossroads, p. 51, Appendix A).

Traffic volumes generating the CO concentrations for the "hot spot" analysis, shown on **Table 5.3-I – Traffic Volumes**. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per day and AM/PM traffic volumes of 8,062 vehicles per hour and 7,719 vehicles per hour, respectively (Urban Crossroads, p. 51, Appendix A). The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (4.6 ppm x 4= 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm).[5] At buildout of the Project, the highest average daily traffic trips on a segment of the road would be 60,500 daily trips on Driveway 1 and Ramona Expressway, which is lower than the highest daily traffic volumes at Wilshire Boulevard and Veteran Avenue of 100,000 vehicles per day (Urban Crossroads, p. 51, Appendix A). Additionally, the highest AM/PM trips on a segment of a road would be 4,091 vehicles per hour and 4,758 vehicles per hour respectively, which is lower than the highest AM/PM traffic

[5] Based on the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).

volumes at Wilshire Boulevard and Veteran Avenue of 8,062 vehicles per hour and 7,719 vehicles per hour (Urban Crossroads Table 3-10 and Table 3-11, p. 52).

As such, the Project would not produce the volume of traffic require to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study, or based on representative BAAQMD CO threshold considerations, as shown on **Table 5.3-J – Project Peak Hour Traffic Volumes**. Therefore, Project impacts related to CO "hot spots" are considered less than significant and no mitigation is required.

Table 5.3-I – Traffic Volumes

Intersection Location	Peak Traffic Volumes (vehicles per hour)				
	Eastbound (AM/PM)	Westbound (AM/PM)	Southbound (AM/PM)	Northbound (AM/PM)	Total (AM/PM)
Wilshire-Veteran	4,954/2,069	1,830/3,317	721/1,400	560/933	8,062/7,719
Sunset-Highland	1,417/1,764	1,342/1,540	2,304/1,832	1,551/2,238	6,614/5,374
La Cienega-Century	2,540/2,243	1,890/2,728	1,384/2,029	821/1,674	6,634/8,674
Long Beach-Imperial	1,217/2,020	1,760/1,400	479/944	756/1,150	4,212/5,514

Source: Urban Crossroads 2018 (revised 2019), Table 3-10 (Appendix A).

Table 5.3-J – Project Peak Hour Traffic Volumes

Intersection Location	Peak Traffic Volumes (vph)				
	Northbound (AM/PM)	Southbound (AM/PM)	Eastbound (AM/PM)	Westbound (AM/PM)	Total (AM/PM)
Driveway 1/Ramona Expressway	0/0	4/19	1,542/2,126	1,999/1,715	3,546/3,860
Indian Avenue/Driveway 2	7/18	0/0	311/562	585/794	903/1,375
Indian Avenue/Perry Street	603/794	291/555	0/0	3/6	896/1,355
Indian Avenue/Ramona Expressway	294/411	287/557	1,542/2,126	1,969/1,663	4,091/4,758

Source: Urban Crossroads 2018 (revised 2019), Table 3-11 (Appendix A).

Health Risk Assessment

A mobile source Health Risk Assessment (HRA) was prepared by Urban Crossroads dated November 1, 2018 (Appendix B) to evaluate Project-related impacts to sensitive receptors (residential, schools) and adjacent workers as a result of heavy-duty diesel trucks accessing the site. Also, Urban Crossroads prepared a Supplemental Air Quality Assessment, dated February 19, 2019 (Appendix C), which provided further analysis of the link between Project emissions and health impacts, to address the recent Friant Ranch California Supreme Court decision.

At this time, future tenants of the proposed Project are unknown. Therefore, to present the potential worst-case conditions, the HRA analysis assumed that the Project would be operational 24 hours a day, seven days a week. It is expected that

the Project operations 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. No cold storage is proposed or planned at the Project site. According to the TIA prepared for the Project, the Project is expected to generate a total of 600 trip-ends per day (actual vehicles). The Project trip generation includes 407 passenger cars and 193 truck trip-ends per day from Project operations within the Project site/off-site improvement area. The vehicle fleet mix, in terms of actual trucks that was analyzed in the TIA included 67.81% Passenger Cars, 5.38% Light-Heavy-Duty (LHD)/2-axle, 6.67% Medium-Heavy-Duty (MHD)/3-axle, 20.13% Heavy-Heavy-Duty (HHD)/4+-axle trucks (Urban Crossroads 2018 p. 3 and p. 42, Appendix A).

The closest sensitive receptor is a non-conforming residence located approximately 187 feet east of the Project site. This residence has the greatest potential exposure to Project DPM source emissions. At a maximally exposed individual receptor, the maximum incremental cancer risk attributable to Project diesel particulate matter (SPM) source emissions is estimated at 0.60 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be 0.0003, which would not exceed the applicable threshold of 1.0. As such, implementation of the proposed Project will not cause a significant human health or cancer risk to adjacent residences (Urban Crossroads 2018 pp. 1-2 and p. 17, Appendix B).

The worker receptor land use with the greatest potential exposure to Project DPM source emissions is located immediately adjacent to the west of the Project site. At a maximally exposed individual worker, the maximum incremental cancer risk impact at this location is 0.17 in one million which is less than the threshold of 10 in one million. Maximum non-cancer risks at this location were estimated to be 0.0005, which would not exceed the applicable threshold of 1.0. As such, implementation of the proposed Project will not cause a significant human health or cancer risk to adjacent workers. All other modeled worker locations in the vicinity of the Project by Urban Crossroads were determined to be exposed to less emissions and therefore less risk than the maximally exposed individual worker described above (Urban Crossroads 2018 pp. 1-2 and p. 17, Appendix B).

The school site land use with the greatest potential exposure to Project DPM source emission is located at the Val Verde Regional Learning Center/Val Verde High School located more than 1,000 feet southwest of the Project site and off-site improvement area. At the maximally exposed individual school child, the maximum incremental cancer risk impact at this location is 0.04 in one million which is less than the threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be 0.00006 which would not exceed the applicable threshold of 1.0 (Urban Crossroads 2018 pp. 1-2 and p. 17, Appendix B).

Based on the above discussion, the health risk levels with implementation of the proposed Project are considered to be less than significant and no mitigation is required.

3e. **Less than significant impact.** The human nose is the best means of determining the strength of an odor; however, not all people are equally sensitive and they do not always agree about the severity of an odor once it is detected. Therefore, precise documentation of the strength and nature of an odor is generally unavailable.

It is anticipated that the major potential sources of odor from the proposed Project would occur during construction, particularly from construction equipment exhaust. However, this impact would occur in the immediate vicinity of the proposed Project site/off-site improvement area and is short-term. Current land uses surrounding the proposed Project site and off-site improvement area include a mixture of industrial uses, commercial uses, vacant land, and non-conforming residential uses.

Additionally, the California Air Resources Board (CARB) has developed an Air Quality and Land Use Handbook that outlines major common sources of odor complaints, including: sewage treatment plants, landfills, recycling facilities, and petroleum refineries (CARB 2005, p. 2-2). As stated In *Threshold 3d* above, the closest sensitive receptor (non-conforming residential use) is located approximately 187 feet east of the proposed Project site (see **Figure 2**). The Project is proposed to operate as a high-cube distribution center warehouse, which is not included on CARB's list of facilities that are known to be prone to generate odors. Further, odor intensity decreases as distance from the source increases because it allows fresh air to mix with the odors. Thus, because the Project is not a use that is prone to generate odors that could affect a substantial number of people, impacts are considered less than significant and no mitigation is required.

5.4. BIOLOGICAL RESOURCES	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

References: RCIT, Perris 2005a, Perris 2011, RCA, Glenn Lukos Associates, Inc. (GLA) (Appendix D), and GLA (Appendix E).

Applicable PVCCSP Standards and Guidelines

There are no PVCCSP Standard and Guidelines applicable to the analysis of biological resources for the proposed Project. The PVCCSP EIR mitigation measures that are applicable to the proposed Project are incorporated in the following analysis.

Explanation of Checklist Answers

4a. **Less than significant impact with mitigation.** The proposed Project involves the development of an approximately 428,730-square-foot warehouse building with associated site improvements, and off-site improvements that involves construction of Driveway 2, open landscaped area at the southwest corner of West Perry Street and Indian Avenue, and West Perry Street and Indian Avenue intersection improvements. A Biological Technical Report (BTR) was prepared for the Project by Glenn Lukos Associates, Inc. (GLA) to assess potential impacts related to biological resources. GLA conducted biological surveys on June 26, 2018 and July 18, 2018. Based on GLA's observations of the Project site and off-site improvement area during the biological surveys, GLA described the site consisting of disturbed, partially tilled field and documented an existing concrete-lined concrete-bottomed, roadside ditch constructed in the uplands along with an existing dirt access road next to the ditch (GLA p. 20, Appendix D).

No special-status plants were detected or observed on the Project site or the off-site improvement area by GLA during the time of the biological surveys as the site has been subject to previous disturbance from active site maintenance and disking (GLA p. 27, Appendix D). Additionally, the Project site is not located within Narrow Endemic Plant Species Survey Area (NEPSSA) or Criteria Area Plant Species Survey Area (CAPSSA) of the MSHCP.

No special-status animal species were detected or observed on the Project site or the off-site improvement area by GLA during the time of the biological surveys as the site has been subject to previous disturbance from active site maintenance and disking (GLA p. 34, Appendix D). GLA noted that all of the sensitive species potentially occurring on-site have been adequately covered under the Western Riverside MSHCP and no additional surveys are required (GLA p. 34, Appendix D).

The Project site and off-site improvement area is located within a MSHCP Survey Area for burrowing owls (GLA Exhibit 4, Appendix D). A focused burrow survey was conducted on June 26, 2018 by GLA; GLA identified suitable burrows within the Project site/off-site improvement area. Consequently, focused burrowing owl surveys were conducted on July 18, 2018, August 8, 2018, August 10, 2018, and August 11, 2018 by GLA in all suitable habitat within the Project site/off-site improvement area in accordance with survey guidelines described in the 2006 MSHCP Burrowing Owl Survey Instructions. No burrowing owls or signs of burrowing owls were found on the Project site or off-site improvement area during the focused survey efforts by GLA (GLA p. 34, Appendix D). Nonetheless, because there still is suitable habitat for burrowing owls on- and off-site and there could be a potential for burrowing owls to utilize the Project site/off-site improvement area at any time, pursuant to mitigation measure **MM BIO 1**, a 30-day preconstruction survey shall be conducted prior to initiation of construction activities to ensure protection for this species. If burrowing

owls are detected on the Project site or off-site improvement area during the pre-construction survey, the burrowing owls shall be relocated/excluded from the Project site or off-site improvement area outside of the breeding season following accepted protocols, and subject to approval of the City, California Department of Fish and Wildlife (CDFW), and U.S. Fish and Wildlife Service, if necessary.

The Project site and off-site improvement area contains shrubs and ground cover that provide suitable habitat for nesting native birds. Mortality of native birds (including eggs) is prohibited under the California Fish and Game Code.[6]

Development of the Project has the potential to impact active bird nests if vegetation is removed during the nesting season (February 1 to August 31). Impacts to nesting birds are prohibited by the California Fish and Game Code. Mitigation measure **MM BIO 2** shall be implemented to avoid mortality to nesting birds. As such, impacts to burrowing owls and migratory birds will be less than significant with mitigation incorporated.

Project Mitigation Measures

MM Bio 1: A qualified biologist shall conduct a pre-construction presence/absence survey for burrowing owls within 30 days prior to site disturbance. If burrowing owls are detected on the Project site or off-site improvement area, the owls shall be relocated/excluded from the Project site or off-site improvement area outside of the breeding season following accepted protocols, and subject to the approval of the City, California Department of Fish and Wildlife, and U.S. Fish and Wildlife Service, if necessary.

MM Bio 2: The removal of trees and vegetation shall be prohibited during the migratory bird nesting season (February 1 through September 15), unless a migratory bird nesting survey is completed in accordance with the following requirements:

a) A migratory nesting bird survey of all trees to be removed shall be conducted by a qualified biologist within three (3) days prior to initiating tree removal or vegetation clearing within 500 feet of a mature tree.

b) A copy of the migratory nesting bird survey results report shall be provided to the City of Perris Planning Division. If the survey identifies the presence of active nests, then the qualified biologist shall provide the City Planning Division with a copy of maps showing the location of all nests and an appropriate buffer zone around each nest sufficient to protect the nest from direct and indirect impact. The size and location of all buffer zones, if required, shall be subject to review and approval by the City Planning Division and shall be no less than a 300-foot radius around the nest for non-raptors and a 500-foot radius around the nest for raptors. The nests and buffer zones shall be field checked

[6] Sections 3505, 3503.5, and 3800 of the California Department of Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs.

weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist and City Planning Division verify that the nests are no longer occupied and the juvenile birds can survive independently from the nests.

4b. **Less than significant impact.** The Project site and off-site improvement area contains ruderal/disturbed/developed vegetation and does not support riparian or other sensitive vegetation communities. Therefore, GLA concluded no direct impacts to riparian or other sensitive vegetation communities, including special-status vegetation communities would occur with the development of the proposed Project (GLA p. 41, Appendix D). The proposed Project is not expected to cause potential indirect impacts to natural vegetation communities downstream of the proposed Project site or off-site improvement area as the connection to the PVSC passes through various culverts and other flood control structures before entering the PVSC (GLA p. 41, Appendix D). Nonetheless, any potential impacts will be reduced to less than significant levels with the preparation and implementation of a stormwater pollution prevent plan (SWPPP) and compliance with the National Pollutant Discharge Elimination System (NPDES) requirements.

The BTR prepared for the Project by GLA states that the Project impact area supports 0.26 acre of a concrete-bottomed, concrete-sided roadside ditch constructed in, and draining, wholly upland areas which does not support a relatively permanent flow of water. GLA determined that the roadside ditch has been artificially constructed in the uplands and is not a natural drainage feature that would be considered riparian/riverine habitat. Instead, GLA concluded that this feature is a human-induced, artificially constructed concrete ditch constructed to collect road runoff which does not meet the classification of riparian/riverine resources under the MSHCP as the ditch does not contain habitat dominated by trees, shrubs, or persistent emergent mosses and lichens, and the ditch is concrete-bottomed and concrete-sided, thus lacking habitat for species targeted for conservation under the MSHCP (GLA p. 38, Appendix D). Additionally, based on GLA's biological surveys, GLA concluded that the Project site and off-site improvement area do not contain suitable soils for vernal pools (GLA p. 42, Appendix D). Based on the above discussion, implementation of the proposed Project will not impact riparian/riverine habitat or other sensitive natural communities. Impacts are considered to be less than significant and no mitigation is required.

4c. **Less than significant impact with mitigation.** The BTR prepared for the Project by GLA states that the Project impact area supports 0.26 acre of a concrete-bottomed, concrete-sided roadside ditch constructed in, and draining, wholly upland areas which does not support a relatively permanent flow of water. As this feature is the only drainage-related feature on the Project site and off-site improvement area, and it has been constructed in, and drains, wholly upland areas which do not support a relatively permanent flow of water, there are no Army Corps of Engineers jurisdictional waters which would be regulated pursuant to Section 404 of the Clean Water Act within the Project (GLA p. 36, Appendix D; GLA p. 2 and p. 10, Appendix E).

The BTR prepared for the Project by GLA states that the regional board jurisdiction associated with the Project totals 0.17 acre, none of which consists of jurisdictional

wetlands (see **Figure 11 – RWQCB Jurisdictional Feature**). The CDFW jurisdiction associated with the Project totals 0.26 acre, all of which consists of non-riparian streambed. A total of 1,235 linear feet of streambed is present (see **Figure 12 – CDFW Jurisdictional Feature**) (GLA pp. 36-37, Appendix D; GLA p. 2 and p. 11, Appendix E).

Areas west of the Project site contain the extension of the concrete-bottomed, concrete-sided flood control channel which eventually discharges into a down-drain westerly of the Project boundary (Line E). Flows from this flood control channel discharge into the underground storm drain system before entering the Project site. The Project site's western boundary has been partially graded and excavated and includes minor evidence of sheet flow from this concrete flood control channel during very large storm events, but there is no evidence of bed, bank, or channel, or ordinary high-water mark (OHWM), or high-water mark (HWM) and these flows dissipate into an upland area shortly after entering the Project site (GLA pp. 36-37, Appendix D; GLA p. 2 and pp. 10-12, Appendix E).

Flows from the roadside ditch enter the Project site along its westerly boundary and continue easterly for 1,235 linear feet before entering a culvert at the intersection of Indian Avenue and Ramona Expressway. Eventually, flows from this ditch enter the PVSC just east of Redlands Avenue (GLA pp. 36-37, Appendix D; GLA pp. 11-12, Appendix E).

With regards to the Regional Board jurisdiction, the OHWM for the roadside ditch is approximately five feet wide and is evidenced by the presence of water marks, debris wracking, and sediment deposits. With regards to the CDFW jurisdiction, the HWM for the roadside ditch is approximately eight feet wide and is evidenced by the presence of water marks, debris wracking, sediment deposits, bed, bank, and channel. GLA did not observe vegetation within the roadside ditch during the biological survey efforts (GLA pp. 36-37, Exhibit 6A and Exhibit 6B, Appendix D; GLA pp. 11-12, Appendix E).

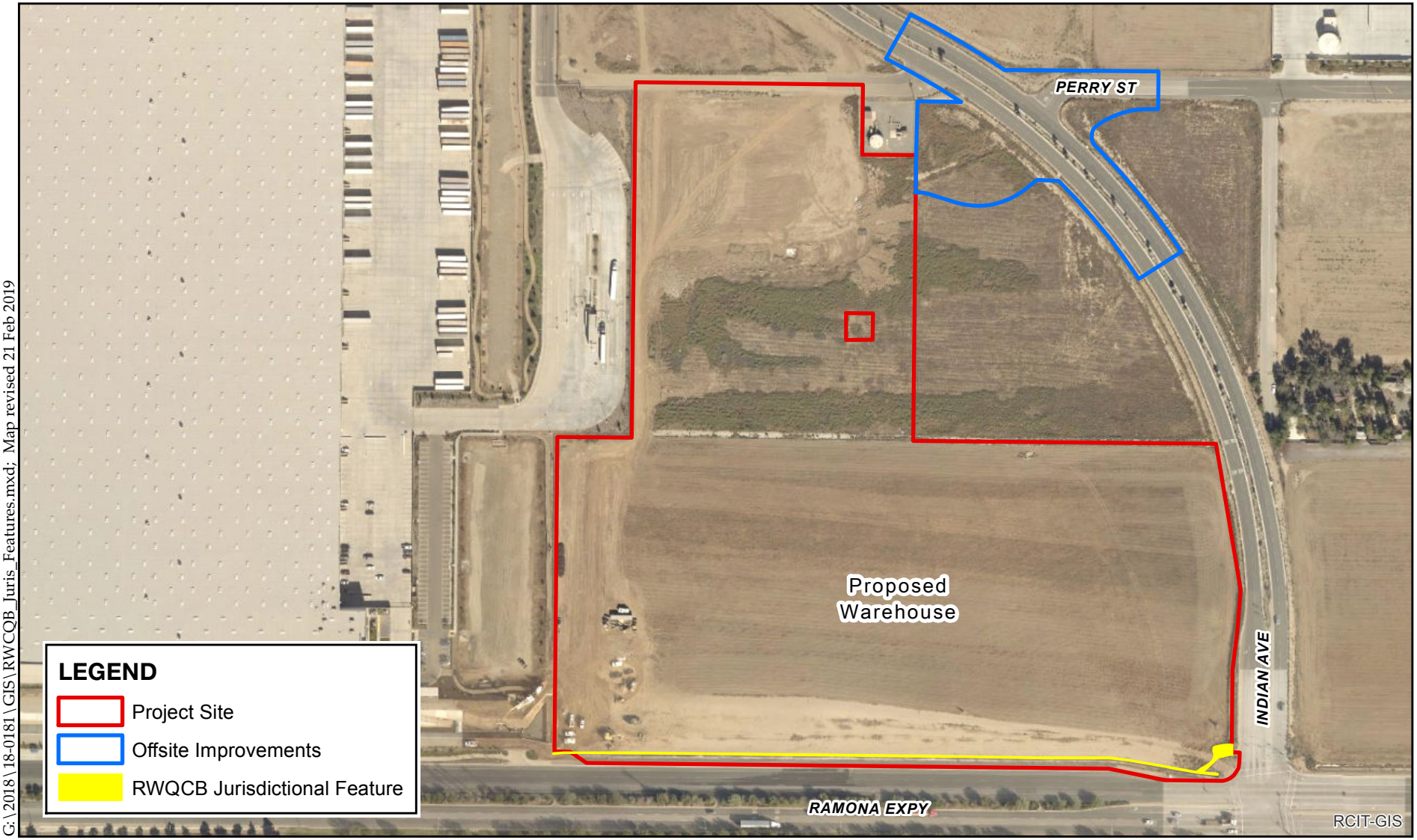
Implementation of mitigation measure **MM Bio 3** shall be incorporated to mitigate the permanent impacts to 0.17 acre of Regional Board jurisdiction and permanent impacts to 0.26 acre of CDFW jurisdiction as a result of proposed permanent fill of a concrete roadside ditch (see **Figure 11 – RWQCB Jurisdictional Feature** and **Figure 12 – CDFW Jurisdictional Feature**). Consequently, impacts are considered to be less than significant with mitigation incorporated.

Project Mitigation Measures

> **MM Bio 3:** The Project Proponent shall compensate for permanent impacts to 0.17 acre of Regional Board jurisdiction and 0.26 acre of California Department of Fish and Wildlife (CDFW) jurisdiction at a minimum 1:1 mitigation-to-impact ratio through the purchase of rehabilitation, re-establishment, and/or establishment mitigation credits at an approved mitigation bank or in-lieu fee program within the San Jacinto River and/or Santa Ana River Watershed. The mitigation receipt from this fee payment will be provided to the City of Perris prior to permanent disturbance to the roadside ditch on site.

4d. **Less than significant impact.** The Project site is not located within a MSHCP Criteria Cell Group, Conservation area, core area, or linkage area (GLA p. 4,

Appendix D). The land uses surrounding the Project site and off-site improvement area include a mix of undeveloped, vacant land and industrial uses to the north, industrial uses to the south and west, and a mix of vacant land, commercial uses, and non-conforming residential uses to the east. As such, the Project site and off-site improvement area is not located adjacent to extensive native open space habitats and do not represent a wildlife corridor between large open space habitats. Impacts are considered to be less than significant and no mitigation is required.



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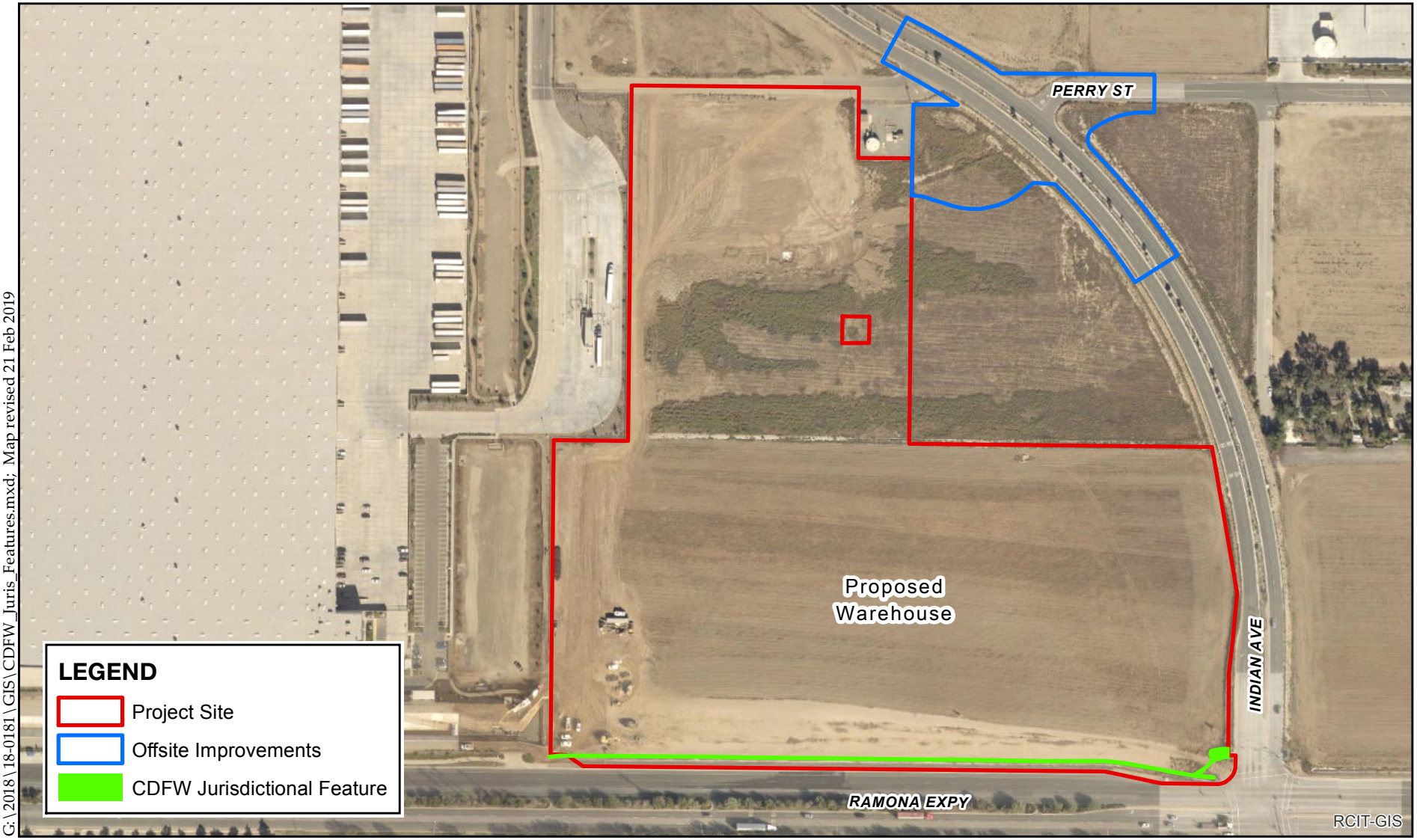
Source: Glenn Lukos Associates, Sept. 2018;
Riverside Co. GIS, 2019 (streets) and 2016 (imagery).

Figure 11 - RWQCB Jurisdictional Feature

IDI Indian Avenue and Ramona Expressway Warehouse Project

ALBERT A. WEBB ASSOCIATES



G:\2018\18-0181\GIS\CDFW_Juris_Features.mxd; Map revised 21 Feb 2019

Source: Glenn Lukos Associates, Sept. 2018;
Riverside Co. GIS, 2019 (streets) and 2016 (imagery).

Figure 12 - CDFW Jurisdictional Feature

IDI Indian Avenue and Ramona Expressway Warehouse Project

ALBERT A. WEBB ASSOCIATES

4e. **Less than significant impact.** The City has adopted an ordinance (Ordinance No. 1123) to establish a local development mitigation fee for funding the preservation of natural ecosystems in accordance with the MSHCP and has also adopted the following General Plan policies for the protection of biological resources:

Goal II	Preservation of areas with significant biotic communities.
Policy II.A	Comply with state and federal regulations to ensure protection and preservation of significant biological resources.
Measure II.A.2	Public and private projects, located in areas with potential for moderate or high plant and wildlife sensitivity, require biological surveys as part of the development review process.
Measure II.A.3	Public and private projects that are also subject to Federal or State approval with respect to impacts to Water of the U.S. and/or Streambeds require evidence of completion of the applicable federal permit process prior to the issuance of a grading permit.
Goal III	Implementation of the MSHCP.
Policy III.A	Review all public and private development and construction projects and any other land use plans or activities within the MSHCP area, in accordance with the conservation criteria procedures and mitigation requirements set forth in the MSHCP.

The Project applicant will be required to pay applicable MSHCP fees pursuant to Ordinance No. 1123. Through compliance with the MSHCP and this ordinance, development within the PVCCSP area will not conflict with any local policies or ordinances protecting biological resources (Perris 2011, p. 4.3-28). Therefore, because the Project will be required to comply with these policies, impacts are considered less than significant and no mitigation is required.

4f. **Less than significant impact with mitigation.** The Project site and off-site improvement area is located within the Mead Valley Area Plan of the Western Riverside MSHCP. The Project is not within a MSHCP Criteria Cell or Conservation Area. Because the Project site and off-site improvement area is not located within a Criteria Cell, the Project site or off-site improvement area is not in an area contemplated to be set aside for Conservation. Since the Project site and off-site improvement area is not located within a Criteria Cell, the Project is not subject to the Habitat Evaluation and Acquisition Negotiation Strategy (HANS) or Joint Project Review (JPR) process.

In accordance with the MSHCP, the proposed Project was reviewed for consistency with the MSHCP Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pool), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.3.2 (Additional Survey Needs and Procedures), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.4 (Fuels Management). The Project's consistency with each of these sections is discussed below.

Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pool)

Riparian/Riverine areas are lands which contain habitat dominated by trees, shrubs, persistent emergent mosses and lichens which occur close to or which depend upon soil moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year. Vernal pools are seasonal wetlands that occur in depression areas that have wetland indicators of all three parameters (soil, vegetation, and hydrology) during the wetter portion of the growing season but normally lack wetlands indicators of hydrology and/or vegetation during the drier portions of the growing season. However, features which have been artificially created (unless such features were created for the purpose of providing wetlands habitat or if open waters were created from the alteration of natural stream courses) are not considered to be riparian/riverine areas.

Section 6.1.2 of the MSHCP requires habitat assessments (and focused surveys where suitable habitat is present) for riparian bird species with MSHCP survey requirements, including the least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), and western yellow-billed cuckoo (*Coccyzus americanus occidentalis*).

GLA conducted biological surveys on June 26, 2018 and July 18, 2018. Based on GLA's observations of the Project site and off-site improvement area during the biological surveys and the habitat on the Project site and off-site improvement area, no MSHCP riparian, riverine or vernal pool resources including fairy shrimp habitat were documented within or immediately adjacent to the Project site or off-site improvement area and no suitable habitat for the least Bell's vireo, southwestern willow flycatcher, or western yellow-billed cuckoo was detected within or adjacent to the Project site or off-site improvement area (GLA, p. 28, pp. 30-31, and p. 42, Appendix D). The BTR prepared for the Project by GLA states that the Project impact area supports 0.26 acre of a concrete-bottomed, concrete-sided roadside ditch constructed in, and draining, wholly upland areas which does not support a relatively permanent flow of water. GLA determined that the roadside ditch has been artificially constructed in the uplands and is not a natural drainage feature that would be considered riparian/riverine habitat. Instead, GLA concluded that this feature is a human-induced, artificially constructed concrete ditch constructed to collect road runoff which does not meet the classification of riparian/riverine resources under the MSHCP as the ditch was artificially created and does not contain habitat dominated by trees, shrubs, or persistent emergent mosses and lichens, and the ditch is concrete-bottomed and concrete-sided, thus lacking habitat for species targeted for conservation under the MSHCP (GLA p. 38, Appendix D).Therefore, the proposed Project is consistent with Section 6.1.2 of the MSHCP.

Section 6.1.3 (Protection of Narrow Endemic Plant Species)

The Project site and off-site improvement area is not located within a NEPSSA Survey Area. Therefore, no surveys are warranted. The proposed Project is consistent with Section 6.1.3 of the MSHCP.

Section 6.3.2 (Additional Survey Needs and Procedures)

The Project site and off-site improvement area is not located within a CAPSSA Survey Area. Therefore, no surveys are warranted. The Project site and off-site

improvement area is not located within the Amphibian or Mammal Species Survey Areas; therefore, no additional surveys are required for amphibian or mammal species (GLA, p. 4 and p. 46, Appendix D).

The Project site and off-site improvement area occurs within a MSHCP Survey Area for burrowing owls (GLA Exhibit 4, Appendix D). A focused burrow survey was conducted on June 26, 2018 by GLA; GLA identified suitable burrows within the Project site and off-site improvement area. Consequently, focused burrowing owl surveys were conducted on July 18, 2018, August 8, 2018, August 10, 2018, and August 11, 2018 by GLA in all suitable habitat within the Project site/off-site improvement area in accordance with survey guidelines described in the 2006 MSHCP Burrowing Owl Survey Instructions. No burrowing owls or signs of burrowing owls were found on the Project site or off-site improvement area during the focused survey efforts by GLA (GLA p. 34, Appendix D). Nonetheless, pursuant to mitigation measure **MM Bio 1**, a 30-day preconstruction survey shall be conducted prior to initiation of construction activities to ensure protection for this species. If burrowing owls are detected on the Project site or off-site improvement area, the burrowing owls shall be relocated/excluded from the Project site or off-site improvement area outside of the breeding season following accepted protocols, and subject to approval of the City, CDFW, and U.S. Fish and Wildlife Service, if necessary. Therefore, the proposed Project is consistent with Section 6.3.2 of the MSHCP.

Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface)

Section 6.1.4 of the MSHCP outlines policies intended to minimize the indirect effects associated with locating development in close proximity to the MSHCP Conservation Area. To minimize these indirect effects, guidelines in Section 6.1.4 of the MSHCP shall be implemented in conjunction with the review of individual public and private development projects that are located in proximity to the MSHCP Conservation Area. The review of such implementing development and infrastructure projects is required to address drainage, toxics, lighting, noise, invasive species, barriers, and grading/land development.

The proposed Project site and off-site improvement area is not within a Criteria Cell and lands immediately adjacent to the Project site and off-site improvement area are not within a Criteria Cell which would include MSHCP Conservation Areas. The land uses surrounding the Project site and off-site improvement area include a mix of undeveloped, vacant land and industrial uses to the north, industrial uses to the south and west, and a mix of vacant land, commercial uses, and non-conforming residential uses to the east. As such, the Project site and off-site improvement area is not subject to Section 6.1.4 of the MSHCP since the Project site or off-site improvement area is not in close proximity to MSHCP Conservation Areas. Therefore, implementation of the proposed Project is consistent with Section 6.1.4 of MSHCP.

Section 6.4 (Fuels Management)

Section 6.4 of the MSHCP focuses on hazard reduction for human safety in a manner compatible with public safety and conservation of biological resources. According to the Fuels Management Guidelines of the MSHCP, new development that is planned adjacent to the MSHCP Conservation Area, or other undeveloped areas, shall incorporate brush management within the development boundaries and shall not encroach into the MSHCP Conservation Area.

The proposed Project site and off-site improvement area is not located adjacent to an existing or proposed MSHCP Conservation Area and is surrounded by already developed or highly disturbed lands. Therefore, the Project is consistent with Section 6.4 of the MSHCP.

In summary, the proposed Project is consistent with Section 6.1.2, Section 6.1.3, Section 6.3.2, Section 6.1.4, and Section 6.4 of the MSHCP. With implementation of mitigation measure **MM Bio 1 and MM Bio 2** to reduce impacts to burrowing owls and nesting birds, respectively, to less than significant levels, the proposed Project will be consistent with the MSHCP.

Stephen's Kangaroo Rat Habitat Conservation Plan

The City, including the Project site and off-site improvement area, is also within the boundary of the Stephen's Kangaroo Rat Habitat Plan (SKR HCP). The SKR HCP establishes a mechanism for the long-term conservation of the species. Potential impacts to the Stephen's Kangaroo Rat (SKR) are mitigated on a regional basis through compliance with the SKR HCP. The Project site and off-site improvement area is located within the Fee Area boundary of the SKR HCP and the Project applicant will pay all applicable fees pursuant to County Ordinance 663.10 to mitigate potential impacts to this species. Therefore, the Project is consistent with the SKR HCP and no mitigation is required.

Project Mitigation Measures

Refer to **MM Bio 1 and MM Bio 2** above under Threshold 4a.

5.5 CULTURAL RESOURCES	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

References: Perris 2011, Perris 2005b, Brian F. Smith and Associates Inc. 2018 (revised 2019) (BFSA) (Appendix F), and BFSA 2018 (revised 2019) (Appendix G).

Applicable PVCCSP Standards and Guidelines

There are no Standards and Guidelines included in the PVCCSP related to cultural resources. By preparing this IS analysis which includes a Phase I Cultural Resources Survey report (Appendix F) and Paleontological Resource and Mitigation Monitoring Assessment (Appendix G), the Project has complied with the following applicable PVCCSP EIR mitigation measure:

PVCCSP MM Cultural 1: Prior to the consideration by the City of Perris of implementing development or infrastructure projects for properties that are vacant, undeveloped, or considered to be sensitive for cultural resources by the City of Perris Planning Division, a Phase I Cultural Resources Study of the subject property prepared in accordance with the protocol of the City of Perris by a professional archeologist shall be submitted to the City of Perris Planning Division for review and approval. The Phase I Cultural Resources Study shall determine whether the subject implementing development would potentially cause a substantial adverse change to any significant paleontological, archaeological, or historic resources. The Phase I Cultural Resources Study shall be prepared to meet the standards established by Riverside County and shall, at a minimum, include the results of the following:

1. Records searches at the Eastern Information Center (EIC), the National or State Registry of Historic Places and any appropriate public, private, and tribal archives.

2. Sacred Lands File record search with the Native American Heritage Commission (NAHC) followed by project scoping with tribes recommended by the NAHC.

3. Field survey of the implementing development or infrastructure project site.

The proponents of the subject implementing development projects and the professional archaeologists shall also contact the local Native American tribes (as identified by the California Native Heritage Commission and the City of Perris) to obtain input regarding the potential for Native American resources to occur at the Project site.

Measures shall be identified to mitigate the known and potential significant effects of the implementing development or infrastructure project, if any. Mitigation for historic resources shall be considered in the following order of preference:

1. Avoidance.

2. Changes to the structure provided pursuant to the Secretary of Interior's Standards.

3. Relocation of the structure.

4. Recordation of the structure to Historic American Buildings Survey (HABS)/Historic American Engineering Record (HAER) standard if demolition is allowed.

Avoidance is the preferred treatment for known and discovered significant prehistoric and historical archaeological sites, and sites containing Native American human remains. Where feasible, plans for implementing projects shall be developed to avoid known significant archaeological resources and sites containing human remains. Where avoidance of construction impacts is possible, the implementing projects shall be

designed and landscaped in a manner, which would ensure that indirect impacts from increased public availability to these sites are avoided. Where avoidance is selected, archaeological resource sites and sites containing Native American human remains shall be placed within permanent conservation easements or dedicated open space areas.

The Phase I Cultural Resources Study submitted for each implementing development or infrastructure project shall have been completed no more than three years prior to the submittal of the application for the subject implementing development project or the start of construction of an implementing infrastructure project.

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

Explanation of Checklist Answers

5a. **No impact.** An archaeological records search was conducted by Brian F. Smith and Associates, Inc. (BFSA) at the EIC at the University of California, Riverside UCR. The Phase I Cultural Resources Survey report prepared by BFSA stated that although no resources were recorded within the Project boundaries or off-site improvement area (Area of Potential Effect [APE]), the records search identified 18 cultural resource properties within one mile of the APE. Most of the recorded resources are historic sites mainly associated with the agricultural history of the area. The Phase I Cultural Resources Survey report noted one prehistoric resource approximately one-mile east of the APE (BFSA p. 22, Appendix F). The Phase I Cultural Resources Survey report also indicated that there has been a total of 41 cultural resource studies conducted within a one-mile radius of the APE, six of which covered portions of the APE. The previous studies on and near the APE did not identify any resources within the Project site or off-site improvement area (BFSA, pp. 22-23, p. 29, Appendix F).

As part of the Phase I Cultural Resources Survey, BFSA reviewed the National Register of Historic Places Index, the Office of Historic Preservation Archaeological Determinations of Eligibility, the Office of Historic Preservation Directory of Properties in the Historic Property Data File, and the 1901 30' USGS Elsinore topographic map at the EIC. Based on BFSA's review of the above-mentioned historic sources at the EIC, BFSA did not identify any potential resources within the APE; however, the 1901 30' USGS Elsinore topographic map shows a structure located immediately adjacent to the northwestern boundary of the APE. Additional in-house research was conducted by BFSA utilizing historic maps and aerial photographs.

A review of the 1938 aerial photograph by BFSA did not show any farmhouses within the APE, but did show a possible corral or pond in the northwest corner of the APE. A review of the 1943 15' USGS Perris quadrangle and an aerial photograph from 1949 by BFSA showed structures likely representing a ranch in the northwest of the APE where the pond or corral feature was located previously. Aerial photographs from 1949 also showed the addition of an agricultural access road extending in an east to west trajectory separating the northern and southern half of the APE. A review of the 1953 aerial photograph by BFSA showed improvements to the access road as well as the addition of a possible irrigation feature south of the access road in the southeastern portion of the APE. Subsequent aerial photographs reviewed by BFSA showed that by the mid-1960s, the ranch complex on the northern half of the

APE had been removed and the APE consisted solely of agricultural fields identified in the southern half. Aerial photographs from between 1978 and 1997 by BFSA showed soil stockpiles within the off-site improvement area, but were removed after the realignment of Indian Avenue in 2011 and 2012. In addition, the Phase I Cultural Resource Survey report noted that the location where the structure was previously mapped on the APE has already been impacted through grading (BFSA pp. 23-24, Appendix F).

An intensive reconnaissance archaeological survey was conducted by BFSA on May 23, 2018 and January 25, 2019. BFSA described the Project site and off-site improvement area as flat, previously disked and disturbed. During the intensive reconnaissance archaeological survey, BFSA observed dirt utility access roads along the northern and western perimeters of the Project site; a concrete "U"-ditch along the southern boundary of the Project site; storm drain culverts just outside of the southeastern and southwestern corners of the Project site; and piles of dumped dirt, concrete, and modern construction debris within the northern half of the Project site. BFSA also observed loose gravel/asphalt road that traverses the Project site, a concrete slab, modern standpipe/spigot, dirt utility roads, concrete ditch, piles of dirt, concrete, and construction debris on the Project site. BFSA concluded that the loose gravel access road and concrete slab with a modern spigot do not qualify as significant historic resources under CEQA (BFSA p. 1 and p. 29, Appendix F).

During the intensive reconnaissance archaeological survey, BFSA observed piles of dumped dirt and tire tracks connecting the proposed warehouse location and Indian Avenue on the off-site improvement area. BFSA determined that all of the aforementioned disturbances are modern, based on the review of recent aerial photographs available from Google Earth, and determined that the disturbances are associated with the development of the adjacent parcel to the west in 2015, the current construction of a warehouse on an adjacent parcel to the northeast, the realignment of Indian Ave in 2011 to 2012, and improvements to Ramona Expressway throughout the early 2000s. (BFSA pp. 25-26, p. 28, Appendix F) Based on the EIC records search, review of aerial photographs, and intensive reconnaissance archaeological survey by BFSA on the Project site and off-site improvement area, no impacts to historical resources are anticipated and no mitigation is required.

5b. **Less than significant impact with mitigation.** As discussed in *Threshold 5a* above, a total of 18 cultural resource properties were recorded within one mile of the APE, none of which were recorded on the Project site or off-site improvement area. BFSA requested a records search of the Sacred Lands File (SLF) of the NAHC, which did not indicate the presence of any sacred sites or locations or religious or ceremonial importance within the APE. In accordance with the recommendations of the NAHC, BFSA contacted all Native American consultants listed in the NAHC response letter and received three responses to date. The Cabazon Band of Mission Indians indicated that the Project is located outside of the Tribe's current reservation boundaries and not within its traditional use area. The Viejas Band of Kumeyaay Indians indicated that the Project area has little cultural significance or ties to Viejas. The Pechanga Band of Luiseño Mission Indians indicated that, although the Project area is not within their reservation lands, it is within their ancestral territory and expressed interest in participating in the Project (BFSA p. 25, Appendix F). The Pechanga Band of Luiseño Mission Indians is part of the Assembly Bill 52 (AB 52) consultation efforts by the City and discussion about the AB 52 consultation is addressed under Section 5.17 of this document. In addition, if other Tribes choose

to engage in the AB 52 consultation process, the City shall include such Tribes in the consultation process.

An intensive reconnaissance archaeological survey was conducted by BFSA on May 23, 2018 and January 25, 2019. No cultural resources, either historic or prehistoric, were discovered during the survey efforts by BFSA (BFSA pp. 28-29, Appendix F). Nonetheless, there is always the potential that previously unidentified archaeological resources may be discovered during ground disturbance. Therefore, Project mitigation measure **MM Cult 1** shall be implemented to ensure that impacts related to previously undiscovered archaeological resources would be less than significant with mitigation incorporated.

Project Mitigation Measures

MM Cult 1: The Project developer shall retain a professional archaeologist[7] prior to the issuance of grading permits. The task of the archeologist shall be to monitor the initial ground-altering activities[8] at the subject site and off-site Project improvement areas for the unearthing of previously unknown archaeological and/or cultural resources. Selection of the archaeologist shall be subject to the approval of the City of Perris Director of Development Services and no grading activities shall occur at the site or within the off-site Project improvement areas until the archaeologist has been approved by the City. The archaeologist shall be responsible for maintaining daily field notes and a photographic record, and for reporting all finds to the developer and the City of Perris in a timely manner. The archeologist shall be equipped to record and salvage cultural resources that may be unearthed during grading activities. The archaeologist shall be empowered to temporarily halt or divert grading equipment and create a buffer area to allow recording and removal of the unearthed resources.

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 resources will differ. However, it is understood that all artifacts with the exception of human remains and related grave goods or sacred/ceremonial objects belong to the property owner. All artifacts discovered at the development site shall be inventoried and analyzed by the professional archaeologist. If any artifacts of Native American origin are discovered, all activities in the immediate vicinity of the find (within a 50-foot radius) shall stop and the Project proponent and Project archaeologist shall notify the City of Perris Planning Division, the Pechanga Band of Luiseño Mission Indians, the Soboba Band of Luiseño

[7] For the purpose of this measure, the City of Perris considers professional archaeologists to be those who meet the United States Secretary of the Interior's standards for recognition as a professional, including an advanced degree in anthropology, archaeology, or a related field, and the local experience necessary to evaluate the specific project. The professional archaeologist must also meet the minimum criteria for recognition by the Register for Professional Archaeologists (RPA), although membership is not required.

[8] For the purpose of this measure, ground altering activities include, but are not limited to, debris removal, vegetation removal, tree removal, grading, trenching, or other site-preparation activities. Initial ground-altering activities refer to the first time that the existing materials are altered by construction-related activities. Materials that have already been disturbed by construction-related activities do not require subsequent monitoring.

Indians, and any other tribes identified by the California Native American Heritage Commission (NAHC) as being affiliated with the area. A designated Native American observer from one of the tribes identified by the NAHC as being affiliated with the area shall be retained to help analyze the Native American artifacts for identification as everyday life and/or religious or sacred items, cultural affiliation, temporal placement, and function, as deemed possible. The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA and shall consider the religious beliefs, customs, and practices of the Luiseño tribes. All items found in associations with Native American human remains shall be considered grave goods or sacred in origin and subject to special handling.

Native American artifacts that are relocated/reburied at the Project site would be subject to a fully executed relocation/reburial agreement with the assisting Native American tribes or bands. This shall include measures and provisions to protect the reburial area from any future impacts. Relocation/reburial shall not occur until all cataloging and basic recordation have been completed. Native American artifacts that cannot be avoided or relocated at the Project site shall be prepared in a manner for curation at an accredited curation facility in Riverside County that meets federal standards per 36 C.F.R. Part 79 and makes the artifacts available to other archaeologists/researchers for further study such as University of California, Riverside Archaeological Research Unit (UCR-ARU) or the Western Center for Archaeology and Paleontology. If more than one Native American group is involved with the Project and they cannot come to an agreement as to the disposition of Native American artifacts, they shall be curated at the Western Center by default. The archaeologist shall deliver the Native American artifacts, including title, to the accredited curation facility within a reasonable amount of time along with the fees necessary for permanent curation.

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

Once grading activities have ceased or the archaeologist, in consultation with the designated Native American observer, determines that monitoring is no longer necessary, monitoring activities can be discontinued following notification to the City of Perris Planning Division. A report of findings, including an itemized inventory of recovered artifacts, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered artifacts. The report shall provide evidence that any Native and Non-Native American archaeological resources recovered during Project development have been avoided, reburied, or curated at an accredited curation facility. A copy of the report shall also be filed with the Eastern Information Center (EIC) and submitted to the Pechanga Band of Luiseño Mission Indians, the Soboba Band of Luiseño Indians, and any other Native American groups involved with the Project.

5c. **Less than significant impact with mitigation.** The geology of the Project site and off-site improvement area is underlain by lower Pleistocene (approximately 1.8 million to perhaps 200,000 to 300,000 year old) very old alluvial fan deposits. The Paleontological Resource and Mitigation Monitoring Assessment prepared for the Project by BFSA stated that based on a paleontological sensitivity map generated by the Riverside County Land Information System, the Project area has a High Potential/Sensitivity (High B), which is "based on [the presence of] geological formations or mappable rock units that contain fossilized body elements, and trace fossils such as tracks, nests, and eggs. The category "High B" indicates that fossils are likely to be encountered at or below a depth of four feet, and may be impacted by excavation work during construction-related activities (BFSA, pp. 1-2, Attachment 3, Appendix G). Because of the High Paleontological Sensitivity (High B) on the Project site and off-site improvement area, Project mitigation measure **MM Cult 2** shall be implemented to reduce impacts to less than significant levels.

Project Mitigation Measures

MM Cult 2: Prior to the issuance of grading permits, if grading and excavation activities will occur at depths greater than 4 feet, the Project applicant shall submit to and receive approval from the City, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The PRIMMP shall include the provision of a qualified professional paleontologist (or his or her paleontological monitor representative) during on-site and off-site subsurface excavation that exceeds three (3) feet in depth. Selection of the paleontologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the site until the paleontologist has been approved by the City.

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

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

A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered specimens. The report and inventory, when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontological resources.

5d. **Less than significant impact with mitigation.** The proposed Project site and off-site improvement area has been historically used for agriculture and has since been vacant. No known cemetery has occurred at the Project site or off-site improvement area so the Project area is not expected to contain human remains, including those interred outside of formal cemeteries. In the unlikely event that human remains are discovered during construction, all activities in the vicinity of the remains shall cease and the contractor shall notify the County Coroner immediately pursuant to California Health & Safety Code Section 7050.5 and California Public Resources Code Section 5097.98. Project mitigation measure **MM Cult 3** shall be implemented to ensure impacts to human remains are less than significant.

Project Mitigation Measures

MM Cult 3: In the event that human remains (or remains that may be human) are discovered at the implementing development Project site during grading or earthmoving, the construction contractors, Project archaeologist, and/or designated Native American observer 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 would 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 NAHC and the Commission would identify the "Most Likely Descendent" (MLD).[9] Despite the affiliation of any Native American representatives at the site, the Commission's identification of the MLD would stand. The MLD shall be granted access to inspect the site of the discovery of the Native American human remains and may recommend to the Project proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave goods. The MLD shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains would be determined in consultation with the City of Perris, the Project proponent, and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply and the median and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

The specific locations of Native American burials and reburials would be proprietary and not disclosed to the general public. The locations would be documented by the consulting archaeologist in conjunction with the

[9] The "Most Likely Descendent" (MLD) is a reference used by the California Native American Heritage Commission to identify the individual or population most likely associated with any human remains that may be identified within a given project area. Under California Public Resources Code, Section 5097.98, the Native American Heritage Commission has the authority to name the MLD for any specific project and this identification is based on a report of Native American remains through the County Coroner's office. The City of Perris will recognize any MLD identified by the Native American Heritage Commission without giving preference to any particular population. In cases where the Native American Heritage Commission is not tasked with the identification of a Native American representative, the City of Perris reserves the right to make an independent decision based upon the nature of the proposed project.

various stakeholders and a report of findings shall be filed with the Eastern Information Center.

If the human remains are determined to be other than Native American in origin, but still of archaeological value, the remains would be recovered for analysis and subject to curation or reburial at the expense of the Project proponent. If deemed appropriate, the remains would be recovered by the coroner and handled through the Coroner's Office. Coordination with the Coroner's Office would be through the City of Perris and in 0consultation with the various stakeholders.

5.6. GEOLOGY AND SOILS	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

References: Perris 2005a, Perris 2005b, Perris 2009, Perris 2011, RCIT, and Southern California Geotechnical (SoCalGeo) (Appendix H).

Applicable PVCCSP Standards and Guidelines

There are no PVCCSP Standard and Guidelines applicable to the analysis of geology and soils. By preparing this IS analysis which includes a Geotechnical Investigation (Appendix H), the Project has complied with the following applicable PVCCSP EIR mitigation measure:

> **PVCCSP MM Geo 1:** Concurrent with the City of Perris' review of implementing development projects, the project proponent of the implementing development project shall submit a geotechnical report prepared by a registered geotechnical engineer and a qualified engineering geologist to the City of Perris Public Works/Engineering Administration Division for its review and approval. The geotechnical report shall assess the soil stability within the implementing development project affecting individual lots and buildings pads, and shall describe the methodology (e.g., over-excavated, backfilled, compaction) being used to implement the project's deigns.

Explanation of Checklist Answers

6a(i). **Less than significant impact.** According to the Geotechnical Investigation prepared for the Project by Southern California Geotechnical (SoCalGeo), the Project site is not located within an Alquist-Priolo Zone (SoCalGeo p. 10, Appendix H). In addition, the County of Riverside has applied additional special status studies zone criteria for additional fault systems, but the City does not contain any county-designated fault zones (Perris 2005a, p. SE-3). The proposed Project site and off-site improvement area is located approximately 10 miles west of the San Jacinto Fault Zone (RCIT). Therefore, although seismic activity is known to exist throughout Southern California, there are no known faults through or near the Project site or off-site improvement area that would result in substantial effects. Further, the Project will be designed according to meet or exceed the seismic standards in the current California Building Code. Therefore, impacts related to earthquake faults are considered to be less than significant and no mitigation is required.

6a(ii). **Less than significant impact.** Although there are no faults directly within the City, there are several active faults within the Southern California region that may contribute to ground shaking at the Project site and off-site improvement area, including: San Andreas, San Jacinto, Cucamonga, and Elsinore Faults (Perris 2005b, p. VI-10). The proposed Project will be designed according to the current California Building Codes, which require structures to be designed to meet or exceed the seismic safety standards set forth therein. Policy I.E. in the PVCCSP requires developments to be adequately protected from damage due to seismic incidents (Perris 2011, p. 4.5-4). Therefore, ground-shaking impacts will be less than significant to the proposed Project and no mitigation is required.

6a(iii). **Less than significant impact.** Liquefaction occurs when shallow, fine to medium-grained sediments saturated with water are subjected to strong seismic ground shaking. It generally occurs when the underlying water table is 50 feet or less below the surface (Perris 2005a, p. SE-9). Pursuant to mitigation measure **MM Geo 1** contained in the PVCCSP EIR, which requires site specific geotechnical investigations for implementing development, a Geotechnical Investigation was conducted by SoCalGeo in December 2017 at the proposed Project site and off-site improvement area to assess soil stability and determine the methodology used to implement the Project's design. The results of the investigation determined that the

static groundwater table is considered to have existed at a depth in excess of approximately 25 feet at the time of the study (SoCalGeo p. 6, Appendix H). Furthermore, the Riverside County GIS website indicates that the proposed Project site and off-site improvement area is located within a zone of low liquefaction susceptibility (SoCalGeo p. 11, Appendix H). Therefore, based on the subsurface conditions encountered at the Project site and off-site improvement area, including lack of groundwater in borings at the Project site and off-site improvement area, as well as previous mapping efforts, potential impacts due to liquefaction are less than significant and no mitigation is required.

6a(iv). **No impact.** The PVCCSP area is located in an area that is relatively flat and it is not located near any areas that possess potential landslide characteristics (Perris 2009, p. 7). The proposed Project site and off-site improvement area is within the PVCCSP area and the site is relatively flat; therefore, no impacts related to landslides are anticipated because the vicinity does not have characteristics necessary to generate a landslide risk. No impacts related to landslides are expected and no mitigation is required.

6b. **Less than significant impact.** Once operational, the majority of the Project site and off-site improvement area will be paved and developed with a high-cube warehouse facility and supporting infrastructure; therefore, no soil erosion is anticipated with long-term operation of the Project site or off-site improvement area.

Short-term construction activities have the potential to result in soil erosion or the loss of topsoil. However, erosion will be addressed through the implementation of existing State and Federal requirements, and minimized through compliance with the NPDES general construction permit which requires that a SWPPP be prepared prior to construction activities and implemented during construction activities. The preparation of a SWPPP will identify BMPs to address soil erosion. Upon compliance with these standard regulatory requirements, the proposed Project is not anticipated to result in substantial soil erosion or the loss of topsoil. Therefore, impacts are considered less than significant and no mitigation is required.

6c. **Less than significant impact.** As discussed above in *Threshold 6aiii* above*,* the proposed Project site and off-site improvement area is located in an area that has been previously determined to have a low potential for liquefaction and liquefaction is not considered to be a significant design concern for this Project. Likewise, the proposed Project site and off-site improvement area is located in a relatively flat area, as discussed above in *Threshold 6aiv*, and landslides do not pose a significant risk at the Project site or off-site improvement area.

The results of laboratory testing on soil samples collected from the site indicate that the near surface alluvium possesses a moderate potential for collapse when exposed to moisture infiltration as well as consolidation when exposed to load increases in the range of those that will be exerted by new foundations (SoCalGeo p. 12, Appendix H). The geotechnical investigation also makes site-specific recommendations as to site development and design, which will be incorporated into the grading plan prepared for the proposed Project. Adherence to the measures identified in the California Building Code, applicable standards of the City's Grading Ordinance, and the recommendations in the geotechnical investigation will reduce impacts resulting from unstable soil conditions to less than significant and no mitigation is required.

6d. **Less than significant impact.** Based on the results of the December 2017 geotechnical report prepared for the Project site and off-site improvement area, the near surface soils have been determined to be low expansive (SoCalGeo p. 9, Appendix H). The Project developer will be required to prepare and submit detailed grading plans for the proposed Project prior to issuance of grading permits, which must be prepared in conformance with applicable standards of the City's Grading Ordinance and the recommendations in the geotechnical report. Development of the Project site and off-site improvement area consistent with the recommendations included in the Geotechnical Investigation will reduce potential impacts from expansive soils to a less than significant level and no mitigation is required.

6e. **No impact.** The proposed Project site and off-site improvement area will connect to the existing sewer system and will not require use of a septic tank. Therefore, no impacts are anticipated and no mitigation is required.

5.7. GREENHOUSE GAS EMISSIONS	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☒	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

References: Perris 2016 and Urban Crossroads 2018 (revised 2019) (Appendix I).

Applicable PVCCSP Standards and Guidelines

The PVCCSP includes Standards and Guidelines relevant to the analysis of air quality impacts presented in this IS and summarized below are incorporated as part of the proposed Project; as such, they are assumed in the analysis presented in this section.

Residential Buffer Development Standards and Guidelines (Section 4.2.8)

- 50-foot setback. A 50-foot setback is required for commercial, industrial, and business professional office developments immediately abutting existing residential property lines.

The PVCCSP EIR mitigation measures related to greenhouse gas (GHG) impacts that are applicable to the proposed Project are incorporated in the following analysis.

Explanation of Checklist Answers

7a. **Less than significant impact with mitigation.** The City does not have an adopted threshold of significance for GHG emissions. For CEQA purposes, the City has discretion to select an appropriate significance criterion, based on substantial evidence. The SCAQMD's adopted numerical threshold of 10,000 metric tons carbon dioxide equivalent ($MTCO_2e$) per year for industrial stationary source emissions is selected as the significance criterion. The SCAQMD-adopted industrial threshold was selected by the City because the proposed Project is more analogous to an industrial use than any other land use such as commercial or residential in terms of

its expected operating characteristics. The Project applicant proposes a warehouse use that will serve mid-stream functions in the goods movement chain between manufacturers and consumers, characteristic of an industrial operation. Further, analysis of the Project's traffic generation in this report is based on the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, 2017 for warehouse and industrial land use categories. Also, 10,000 $MTCO_2e$ has been used as the significance threshold by many local government lead agencies for logistics projects throughout the SCAG region since the SCAQMD adopted this threshold for its own use. Further, to ensure that the threshold is conservative in its application, although the SCAQMD uses their adopted 10,000 $MTCO_2e$ threshold to determine the significance of stationary source emissions for industrial projects, the 10,000 $MTCO_2e$ threshold used in this CEQA document is applied to all sources of Project-related GHG emissions whether stationary source, mobile source, area source, or other.

Use of this threshold is also consistent with guidance provided in the California Air Pollution Control Officers Association *CEQA and Climate Change* handbook, as such, the City has opted to use a non-zero threshold approach based on Approach 2 of the handbook. Threshold 2.5 (Unit-Based Thresholds Based on Market Capture) establishes a numerical threshold based on capture of approximately 90 percent of emissions from future development. The latest threshold developed by SCAQMD using this method is 10,000 $MTCO_2e$ based on the review of 711 CEQA projects.

As shown in **Table 5.7-A – Project GHG Emissions**, the Project will result in approximately 745.44 $MTCO_2e$ per year from construction, area, energy, waste, and water usage. In addition, the Project has the potential to result in an additional 3,764.36 $MTCO_2e$ per year from mobile sources if the assumption is made that all of the vehicle trips to and from the Project area are "new" trips resulting from the development of the Project. As such, the Project has the potential to generate a total of approximately 4,509.80 $MTCO_2e$ per year. As such, the Project would not exceed the SCAQMD's numeric threshold of 10,000 $MTCO_2e$ for industrial uses. Thus, Project-related emissions would not have a significant direct or indirect impact on GHG and climate change. Impacts are considered to be less than significant and no additional mitigation is required beyond those required by the PVCCSP EIR mitigation measures **MM Air 2, MM Air 4, MM Air 11, MM Air 13, MM Air 14, MM Air 19, and MM Air 20**.

Table 5.7-A – Project GHG Emissions

Emission Source	Emissions (metric tons per year)			
	CO_2	CH_4	N_2O	Total CO_2E
Annual construction-related emissions amortized over 30 years	83.55	0.01	0.00	83.82
Area	0.01	3.00E-05	0.00	0.01
Energy	424.64	0.02	4.08E-03	426.27
Mobile Sources	3,761.11	0.13	0.00	3,764.36
Waste	81.81	4.83	0.00	202.67
Water Usage	26.41	0.19	4.76E-03	32.67

Total CO_2E (All Sources)	**4,509.80**
SCAQMD Threshold for Industrial Uses	**10,000**
Threshold Exceeded?	**No**

Source: Urban Crossroads 2018 (revised 2019), Table 3-1 (Appendix I).

PVCCSP Mitigation Measures

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

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

PVCCSP EIR Air 11: Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of five minutes.

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

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

PVCCSP MM Air 19: In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g.,

electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the Project site. These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris' Building Division) prior to conveyance of applicable streets.

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

7b. **Less than significant impact.** The Project's consistency with Assembly Bill 32 (AB 32) and Senate Bill (SB) 32 are discussed below.

Scoping Plan

The Air Resources Board's (ARB's) Scoping Plan identifies strategies to reduce California's GHG emissions in support of AB 32 which requires the State to reduce its GHG emissions to 1990 levels by 2020. Many of the strategies identified in the Scoping Plan are not applicable at the Project level, such as long-term technological improvements to reduce emissions from vehicles. Some measures are applicable and supported by the Project, such as energy efficiency. Finally, while some measures are not directly applicable, the Project would not conflict with their implementation. Reduction measures are grouped into 18 action categories, as follows:

1. **California Cap-and-Trade Program Linked to Western Climate Initiative Partner Jurisdictions.** Implement a broad-based California cap-and-trade program to provide a firm limit on emissions. Link the California cap–and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California.[10] Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.

2. **California Light-Duty Vehicle Greenhouse Gas Standards.** Implement adopted Pavley standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.

3. **Energy Efficiency.** Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).

4. **Renewables Portfolio Standards.** Achieve 33 percent renewable energy mix statewide.

5. **Low Carbon Fuel Standard.** Develop and adopt the Low Carbon Fuel Standard.

[10] California Air Resources Board. California GHG Emissions – Forecast (2002-2020). October 2010

6. **Regional Transportation-Related Greenhouse Gas Targets.** Develop regional GHG emissions reduction targets for passenger vehicles.

7. **Vehicle Efficiency Measures.** Implement light-duty vehicle efficiency measures.

8. **Goods Movement.** Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.

9. **Million Solar Roofs Program.** Install 3,000 megawatts of solar-electric capacity under California's existing solar programs.

10. **Medium- and Heavy-Duty Vehicles.** Adopt medium- (MD) and heavy-duty (HD) vehicle efficiencies. Aerodynamic efficiency measures for HD trucks pulling trailers 53-feet or longer that include improvements in trailer aerodynamics and use of rolling resistance tires were adopted in 2008 and went into effect in 2010.[11] Future, yet to be determined improvements, includes hybridization of MD and HD trucks.

11. **Industrial Emissions.** Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce GHG emissions and provide other pollution reduction co-benefits. Reduce GHG emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.

12. **High Speed Rail.** Support implementation of a high-speed rail system.

13. **Green Building Strategy.** Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.

14. **High Global Warming Potential Gases.** Adopt measures to reduce high warming global potential gases.

15. **Recycling and Waste.** Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials, and mandate commercial recycling. Move toward zero-waste.

16. **Sustainable Forests.** Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation. The 2020 target for carbon sequestration is 5 million $MTCO_2e$/yr.

17. **Water.** Continue efficiency programs and use cleaner energy sources to move and treat water.

18. **Agriculture.** In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.

Table 5.7-B – Scoping Plan Consistency Summary summarizes the Project's consistency with the State Scoping Plan. As summarized, the Project will not conflict with any of the

[11] California Air Resources Board. Scoping Plan Measures Implementation Timeline. October 2010

provisions of the Scoping Plan and in fact supports seven of the action categories through energy efficiency, water conservation, recycling, and landscaping.

Table 5.7-B – Scoping Plan Consistency Summary

Action	Supporting Measures[12]	Consistency
Cap-and-Trade Program	--	Not Applicable. These programs involve capping emissions from electricity generation, industrial facilities, and broad scoped fuels. Caps do not directly affect manufacturing projects.
Light-Duty Vehicle Standards	T-1	Not Applicable. This is a statewide measure establishing vehicle emissions standards.
Energy Efficiency	E-1	Consistent. The Project will include a variety of building, water, and solid waste efficiencies consistent with 2016 CalGreen requirements.
	E-2	
	CR-1	
	CR-2	
Renewables Portfolio Standard	E-3	Not Applicable. Establishes the minimum statewide renewable energy mix.
Low Carbon Fuel Standard	T-2	Not Applicable. Establishes reduced carbon intensity of transportation fuels.
Regional Transportation-Related Greenhouse Gas Targets	T-3	Not Applicable. This is a statewide measure and is not within the purview of this Project.
Vehicle Efficiency Measures	T-4	Not Applicable. Identifies measures such as minimum tire-fuel efficiency, lower friction oil, and reduction in air conditioning use.
Goods Movement	T-5	Not Applicable. Identifies measures to improve goods movement efficiencies such as advanced combustion strategies, friction reduction, waste heat recovery, and electrification of accessories. While these measures are yet to be implemented and will be voluntary, the proposed Project would not interfere with their implementation.
	T-6	
Million Solar Roofs (MSR)	E-4	Not Applicable. The MSR program sets a goal for use of solar systems throughout the state as a

[12] Supporting measures can be found at the following link: http://www.arb.ca.gov/cc/scopingplan/2013_update/appendix_b.pdf

Action	Supporting Measures[12]	Consistency
Program		whole. The Project currently does not include solar energy generation, and it is unknown if the building roof structure will be designed to support solar panels in the future.
Medium- & Heavy-Duty Vehicles	T-7	Not Applicable. MD and HD trucks and trailers working from the proposed parcel delivery facility will be subject to aerodynamic and hybridization requirements as established by ARB; no feature of the Project would interfere with implementation of these requirements and programs.
	T-8	
Industrial Emissions	I-1	Not Applicable. These measures are applicable to large industrial facilities (> 500,000 $MTCO_2e$/yr) and other intensive uses such as refineries.
	I-2	
	I-3	
	I-4	
	I-5	
High Speed Rail	T-9	Not Applicable. Supports increased mobility choice.
Green Building Strategy	GB-1	Consistent. The Project will include a variety of building, water, and solid waste efficiencies consistent with 2016 CalGreen requirements.
High Global Warming Potential Gases	H-1	Not Applicable. The proposed parcel delivery facility is not substantial sources of high Global Warming Potential emissions and will comply with any future changes in air conditioning, fire protection suppressant, and other requirements.
	H-2	
	H-3	
	H-4	
	H-5	
	H-6	
	H-7	
Recycling and Waste	RW-1	Consistent. The Project will recycle a minimum of 50 percent from construction activities and operations pursuant to Assembly Bill 939 and Assembly Bill 75 requirements.
	RW-2	
	RW-3	
Sustainable Forests	F-1	Consistent. The Project will increase carbon sequestration by increasing on-site trees per the Project landscaping plan.
Water	W-1	Consistent. The Project will include use of low-flow

Action	Supporting Measures[12]	Consistency
	W-2	fixtures and efficient landscaping pursuant to 2016 CalGreen requirements.
	W-3	
	W-4	
	W-5	
	W-6	
Agriculture	A-1	Not Applicable. The Project is not an agricultural use.

Source: Urban Crossroads 2018 (revised 2019), Table 3-2 (Appendix I).

Senate Bill 32

At the state level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. The goal of Executive Order S-3-05 is to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). The Project, as analyzed above, is consistent with AB 32. Therefore, the Project does not conflict with this component of Executive Order S-3-05. The Executive Orders also establish goals to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. However, studies have shown that, in order to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its Climate Change Scoping Plan, ARB acknowledged that the "measures needed to meet the 2050 are too far in the future to define in detail." In the First Scoping Plan Update, however, ARB generally described the type of activities required to achieve the 2050 target: "energy demand reduction through efficiency and activity changes; largescale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately."

Unlike the 2020 and 2030 reduction targets of AB 32 and SB 32, respectively the 2050 target of Executive Order S-3-05 has not been codified. Accordingly, the 2050 reduction target has not been the subject of any analysis by CARB. For example, CARB has not prepared an update to the aforementioned Scoping Plan that provides guidance to local agencies as to how they may seek to contribute to the achievement of the 2050 reduction target.

In 2017, the California Supreme Court examined the need to use the Executive Order S-3-05 2050 reduction target in Cleveland National Forest Foundation v. San Diego Association of Governments (2017) 3 Cal.5th 497 (Cleveland National). The case arose from SANDAG's adoption of its 2050 Regional Transportation Plan, which included its Sustainable Communities Strategy, as required by SB 375 (discussed above). On review, the Supreme Court held that SANDAG did not violate CEQA by not considering the Executive Order S-3-05 2050 reduction target.

As explained above, the 2050 reduction target of Executive Order S-3-05 has not been codified, unlike the 2020 and 2030 reduction targets of AB 32 and SB 32, respectively. Accordingly, the 2050 reduction target has not been the subject of any analysis by CARB. For example, CARB has not prepared an update to the aforementioned Scoping Plan that provides guidance to local agencies as to how they may seek to contribute to the achievement of the 2050 reduction target.

Further, the Project is much smaller in size and scope in comparison to the Regional Transportation Plan examined in *Cleveland National*. In that case, the California Supreme Court held that SANDAG did not violate CEQA by not considering the Executive Order S-3-05 2050 reduction target. Accordingly, there is no information presently available to assess the Project's consistency with regard to the 2050 target of Executive Order S-3-05.

The 2017 Scoping Plan builds on the 2008 Scoping Plan in order to achieve the 40 percent reduction from 1990 levels by 2030. Major elements of the 2017 Scoping Plan framework that will achieve the GHG reductions include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing ZEV buses and trucks. When adopted, this measure would apply to all trucks accessing the Project site, this may include existing trucks or new trucks purchased by the Project proponent could be eligible for incentives that expedite the Project's implementation of ZEVs.
- Low Carbon Fuel Standard, with an increased stringency (18 percent by 2030). When adopted, this measure would apply to all fuel purchased and used by the Project in the state.
- Implementing SB 350, which expands the Renewables Portfolio Standard to 50 percent Renewables Portfolio Standard and doubles energy efficiency savings by 2030. When adopted, this measure would apply when electricity is provided to the Project by a utility company.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks. When adopted, this measure would apply to all trucks accessing the Project site, this may include existing trucks or new trucks that are part of the statewide goods movement sector.
- Implementing the proposed Short-Lived Climate Pollutant Strategy, which focuses on reducing methane and hydroflurocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by year 2030. When adopted, the Project would be required to comply with this measure and reduce Short-Lived Climate Pollutant Strategy accordingly.
- Continued implementation of SB 375. The Project is not within the purview of SB 375 and would therefore not conflict with this measure.
- Post-2020 Cap-and-Trade Program that includes declining caps. When adopted, the Project would be required to comply with the Cap-and-Trade Program if it generates emissions from sectors covered by Cap-and-Trade.
- 20 percent reduction in GHG emissions from refineries by 2030. When adopted, the Project would be required to comply with this measure if it were to utilize any fuel from refineries.

- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink. This is a statewide measure that would not apply to the Project.

As shown above, the Project would not conflict with any of the 2017 Scoping Plan elements as any regulations adopted would apply directly or indirectly to the Project.

Further, recent studies show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030.

City of Perris Climate Action Plan Consistency

Significance under this threshold can be determined by showing compliance with applicable air quality plans. As discussed in *Threshold 3a,* above, the proposed Project proposes to operate as a high-cube warehouse building, which is consistent with the planned use for the site in the City's GP 2030 and PVCCSP. Therefore, any population or employment increases as a result of the proposed Project were accounted for by the SCAQMD when developing the AQMP. The City's Climate Action Plan (CAP) utilizes Western Riverside County Council of Government's (WRCOG's) analysis of existing GHG reduction programs and policies that have already been implemented in the sub-region and of applicable best practices from other regions to assist in meeting the 2020 sub-regional reduction target (Perris 2016, pp. 1-3).

The measures identified in the CAP represent the City's actions to achieve the GHG reduction targets of AB 32 for target year 2020. Local measures included in the CAP include:

- An energy measure that directs the City to create an energy action plan to reduce energy consumption citywide.

- Land use and transportation measures that encourage alternate modes of transportation (walking, biking, and transit), reduce motor vehicle use by allowing a reduction in parking supply, voluntary transportation demand management to reduce vehicle miles traveled, and land use strategies that improve jobs-housing balance (increased density and mixed-use).

- Solid waste measure that reduce landfilled solid waste in the City.

The proposed Project would not conflict with these local strategies. Additionally, the proposed Project is consistent with state and regional strategies, listed in the CAP. Further, the proposed Project is subject to California Building Code requirements. New buildings must achieve the 2016 Building and Energy Efficiency Standards and the 2016 California Green Building Standards requirements, which include water conservation measures. Overall, the proposed Project would not conflict with the City's CAP. Impacts are considered less than significant and no mitigation is required.

5.8. HAZARDS/HAZARDOUS MATERIALS	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter-mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or people residing or working in the project area?	☐	☒	☐	☐
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

References: ALUC, Perris 2005a, Perris 2005b, Perris 2009, Perris 2011, Perris 2012, and Hazard Management Consulting, Inc. (HMC) 2019 (Appendix J).

Applicable PVCCSP Standards and Guidelines

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

Airport Overlay Zone (from Chapter 12.0 of PVCCSP)

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

12.1.1 Compatibility with March Air Reserve Base.

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

- Avigation Easement
- Noise Standard
- Land Use and Activities
- Retention and Water Quality Basins
- Notice of Airport in the Vicinity
- Disclosure
- Lighting Plans
- Height Restrictions per Federal Aviation Regulations Part 77
- Clear Zone (Surface B)
- Approach/Departure Clearance Surface (Surface C)
- Inner Horizontal Surface (Surface E)
- Conical Surface
- Form 7460 (Notice of Proposed Construction or Alteration)

Section 4.2.1, General On-site Project Development Standards and Guidelines, of the PVCCSP, also prohibits uses that could affect MARB, avigation easements, APZs, consistent with Section 12. The PVCCSP EIR mitigation measures that are applicable to the proposed Project are incorporated in the following analysis.

Explanation of Checklist Answers

8a. **Less than significant impact.** According to the PVCCSP EIR, all new development within the PVCCSP will be required to comply with the regulations, standards, and guidelines established by the U.S. Environmental Protection Agency, the State, and City related to storage, use, and disposal of hazardous materials and the risk of the public's potential exposure to hazardous substances is considered less than significant (Perris 2011, p. 4.6-11).

The proposed Project site and off-site improvement area is zoned Light Industrial (LI) with an Airport Overlay, which does allow for assembly and storage of non-hazardous products and materials (Perris 2012, p. 2.0-1). Because the future tenants of the proposed warehouse building are unknown at this time, there is the potential that hazardous materials such as petroleum products, pesticides, fertilizer, and other household hazardous products may be stored and transported to and from the proposed facility. However, these hazardous materials would not be manufactured at the Project site or off-site improvement area and would only be stored short-term before transport.

A number of Federal and State agencies prescribe strict regulations for the safe transportation of hazardous materials. Hazardous material transport, storage, and response to upsets or accidents are primarily subject to Federal regulation by the United States Department of Transportation Office of Hazardous Materials Safety in accordance with Title 49 of the Code of Federal Regulations. California regulations applicable to hazardous material transport, storage, and response to upsets or accidents are codified in Title 13 (Motor Vehicles), Title 8 (Cal/OSHA), Title 22 (Management of Hazardous Waste), Title 26 (Toxics) of the California Code of Regulations, and the Chapter 6.95 of the Health and Safety Code (Hazardous Materials Release Response Plans and Inventory), which describes strict regulations for the safe transportation and storage of hazardous materials.

As the proposed Project will be required to comply with all applicable Federal, State, and local laws related to the transportation, use, storage, and response to upsets or accidents that may involve hazardous materials, impacts are considered to be less than significant and no mitigation is required.

8b. **Less than significant impact.** A Phase 1 Environmental Site Assessment (ESA) was completed for the Project site and off-site improvement area in April 2019 by Hazard Management Consulting, Inc. to evaluate the Project site and off-site improvement area for potential recognized environmental conditions (RECs) (HMC) (refer to Appendix J). The Phase 1 ESA was prepared in accordance with the ASTM E 1527-13 Standard Practice for ESAs. The Phase 1 ESA noted that the Project site and off-site improvement area was previously used for agricultural purposes from at least 1938 and there is the potential that there could have been minor chemical uses such as lubricating oils and fuels for farm vehicles, septic systems on site (HMC p. iii, p. 4 and p. 11, Appendix J). A site reconnaissance was conducted by HMC on April 4, 2017, October 27, 2017, and April 11, 2019. HMC noted that the Project site and off-site improvement area was vacant, undeveloped, contained miscellaneous non-hazardous debris, and appeared to have been used for dry farming in the past. No stains or spills were observed by HMC during the time of the site reconnaissance (HMC p. 7, Appendix J).

A review of the Environmental Database Resources Radius Map database search was conducted by HMC to assess potential off-site facilities that could be contributing hazardous substances to the Project site or off-site improvement area and represent an REC. HMC concluded that while there were facilities that either used hazardous substances or experienced releases, none were close enough or in the correct orientation to the Project site or off-site improvement area to be considered as a potential concern (HMC pp. 11-12, Appendix J). As such, based on HMC's review of historical uses on the Project site and off-site improvement area, the Project site and off-site improvement area is not considered a REC (HMC p. 6, Appendix J). Therefore, ground disturbance during Project construction is not anticipated to create a significant hazard to the public or environment.

As discussed in *Threshold 8a* above, there is a potential for hazardous materials and chemicals to be stored at the site for short periods of time prior to transport and distribution which could cause a release. However, the storage and transport of these products would be regulated by Federal, State, and local policies regarding storage and transportation of hazardous waste. Therefore, because the Project site and off-site improvement area has been screened for any hazardous waste-related activities at the Project site and off-site improvement area, and since any hazardous waste-related activities for any future users at the Project site and off-site

improvement area will be required to comply with all existing hazardous waste regulations, impacts will be less than significant and no mitigation is required.

8c. **No impact.** There are no existing or planned schools within a half-mile of the proposed Project site or off-site improvement area. The closest existing school to the proposed Project site and off-site improvement area, as identified in the City's GP 2030 are May Ranch Elementary School and Val Verde High School, located approximately 1.4 miles southeast and 1.5 miles south, respectively, of the proposed Project site/off-site improvement area. It should be noted that the City's GP 2030 identifies May Ranch Elementary School as a proposed school; however, a review of available aerials shows May Ranch Elementary School has been constructed since the General Plan was adopted (Perris 2005a, p. LU-58). Nevertheless, because there are no existing or proposed schools within one quarter mile of the proposed Project site/off-site improvement area and the proposed Project will be required to comply with all applicable Federal, State, and local laws related to the handling of hazardous materials, no impacts are anticipated and no mitigation is required.

8d. **Less than significant impact.** No hazardous materials sites, compiled pursuant to Government Code Section 65962.5, are depicted on or adjacent to the Project site or off-site improvement area. The Environmental Database Resources consulted as part of the Phase I ESA revealed that there are three potential off-site facilities (Well 56, Texaco Service Station, and Lowe's #966) that could contribute hazardous substances to the Project site and off-site improvement area, and represent a REC, described below (HMC pp. 9-10, Appendix J).

- Well 56, located at 303 Perry Street Perris, California, is adjacent to the northeastern side of the Project site/off-site improvement area. Well 56 is a drinking water well and contains an above ground tank and storage sheds. This facility is listed in the Facility Index System/Facility Registry System (FINDS), Enforcement & Compliance History Information (ECHO), and Facility and Manifest Data (Haznet) databases. HMC noted that these listings appear to be related to chemicals uses for well maintenance and backflushing including acidic materials. No evidence of spills or releases were listed.

- Texaco Service Station, located at 4039 N. Perris Avenue, California, is located approximately 1,438 feet east of the Project site/off-site improvement area. A prior release from the Texaco Service Station occurred but has since been closed. As such, HMC did not consider the gas station to be a REC to the Project site or off-site improvement area.

- Lowe's #966, located at 3984 Indian Avenue Perris, California, is adjacent to the Project site/off-site improvement area to the south across Ramona Expressway. This facility is listed on the Aboveground Storage Tank (AST), Resource Conservation Recovery Act (RCRA), Large Quantity Generators (LQG), FINDS, and ECHO databases. HMC noted that these listings reflect the presence of chemicals on that facility but do not necessarily indicate a release occurred. Given the lack of evidence of a release and the fact that the facility is downgradient of the Project site and off-site improvement area, HMC did not consider this facility to represent a REC to the Project site or off-site improvement area.

HMC concluded that while the above mentioned facilities either used hazardous substances or experienced releases, none were close enough or in the correct orientation to the Project site or off-site improvement area to be considered as a potential concern (HMC p. iii, and pp. 11-12, Appendix J). Based on the above discussion, impacts are considered to be less than significant and no mitigation is required.

8e. **Less than significant impact with mitigation.** The Project site and off-site improvement area is located approximately 1 mile southeast of MARB and is within the MARB Airport Influence Policy Area. Thus, the Project site and off-site improvement area is subject to the current 2014 MARB/Inland Port ALUCP. The ALUCP divides the area close to the airport into Influence Areas based on proximity to the airport and perceived risks. The heaviest air traffic volumes are expected in Influence Area I; in Airport Influence Area II, less air traffic at higher altitudes is expected (Perris 2005b, p. IV-34). The City created an Airport Overlay Zone component to the City's land use planning to accommodate development within the City consistent with the land use designations of the 2014 ALUCP. On July 14, 2016, the Riverside County Airport Land Use Commission determined that the City's Airport Overlay Zone is consistent with the 2014 ALUCP. As discussed in the PVCCSP EIR, light industrial land uses are permitted within Area I, Area II, and Area III as described in the 1984 ALUP (Perris 2011, p. 4.6-17).

An ALUC/MARB/Air Force Base (AFB) Intensity Restriction was calculated for the proposed Project based on an analysis for the proposed Project's compliance with the restrictions specified for properties within the APZ I and APZ II areas of the 2014 MARB/Inland Port ALUCP. According to the 2014 MARB/Inland Port ALUCP, the Project site and off-site improvement area is within Zone B1 (Inner Approach/Departure Zone) and APZ I and II as delineated in the 2005 Air Installation Compatible Use Zone Study (AICUZ) for March Air Reserve Base (AICUZ, p. 3-3) (see **Figure 7**). The MARB/Inland Port ALUCP limits the total number of people permitted on a Project site and off-site improvement area at any time in the APZ I and APZ II areas. Limitations imposed by the MARB/Inland Port ALUCP are as follows:

- Limited to 25 people per acre in the APZ I,
- Limited to 50 people per acre in the APZ II, and
- Comply with the maximum 50 percent lot coverage per the applicable APZs.

The northern portion of the Project site and off-site improvement area, where parking and access is proposed, is within APZ I while the southern portion of the site, where the warehouse building, parking, and access are proposed, is within APZ II (see **Figures 7 and 8**).

The following analyzes how the proposed Project complies with these restrictions of the MARB/Inland Port ALUCP. For a more conservative analysis, the proposed off-site improvement area was not used as part of the calculations because the off-site improvement area includes Driveway 2 and intersection improvements which would not trigger substantial number of people within this area.

Methodology – Riverside County Airport Land Use Compatibility Plan / March Air Reserve Base

Pursuant to Appendix C, Table C-1, of the Riverside County ALUCP, the following parameters were used to calculate the occupancy for the proposed Project:

- Warehouse – 35% of the usage intensity from 1 person/500 square feet[13], and
- Office – 1 person/200 square feet[14].
- Compatibility Zone B1 APZ I Criteria = Limited to an average of 25 people per acre.
- Compatibility Zone B1 APZ II Criteria = Limited to an average of 50 people per acre.
- Single-Acre Persons Limit = Limited to 100 people in a single acre.

MARB/Inland Port ALUCP Analysis

The proposed Project is an approximately 428,730-square-foot warehouse building consisting of approximately 419,930 square feet of warehouse area and approximately 8,800 square feet of office area. Based on the rates noted above for warehouse and office uses, approximately 419,930 square feet of warehouse space would equate to 294 people (419,930 square feet/500 square feet x 35% usage intensity) and approximately 8,800 square feet of office space would equate to 44 people (8,800 square feet/200 square feet) within the Project site.

Approximately 18.24 acres of the Project site is within APZ II, where the warehouse and supporting office building is located, and would be subject to the average people per acre limit as outlined above. As such, an average intensity of 19 people per acre (294 people + 44 people / 18.24 acres) for the warehouse and supporting office uses is anticipated **which is consistent with the Compatibility Zone B1 APZ II criterion of 50 people per acre.**

Another measurement required by the MARB/Inland Port ALUCP, is a single-acre intensity limit. For the Compatibility Zone B1 APZ I and APZ II, the ALUCP limits the maximum single-acre intensity to 100 people per single acre.

[13] High-cube warehouses and distribution centers, other than e-commerce centers and fulfillment centers, shall be evaluated on the basis of 35% of the usage intensity that results from the occupancy level indicated in Table C1 of the MARB/Inland Port ALUCP. Since the proposed Project is proposed as a high-cube warehouse, the basis of 35% of the usage intensity that results from the occupancy level for warehouse is used.

[14] Surveys of actual occupancy levels conducted by various agencies have indicated that many retail and office uses are generally occupied at no more than 50% of their maximum occupancy levels, even at the busiest times of day. Therefore, it is reasonable to adjust by 50% the number of people calculated for office and retail uses to reflect the occupancy levels before making the final people per acre determination. According to the ALUCP, office uses require a minimum of 100 square feet per occupant. Based on the 50% adjustment for office uses, the following rate of one person/200 square feet is used for purposes of this analysis.

In order to determine if the Project fits within the 100 people per single acre limit, it was assumed in a worst case calculation that in a single-acre (43,560 square feet), half of the total office space (4,400 square feet of office) is within the single-acre and the remainder of the acre is warehouse (39,160 square feet of warehouse). This would equate to a total occupancy of 50 people (4,400 square feet of office / 200 square feet plus 39,160 square feet of warehouse / 500 square feet x 35% usage intensity), **which is consistent with the Compatibility Zone B1 APZ II single-acre intensity criterion of 100.**

A second method for determining total occupancy involves multiplying the number of parking spaces provided or required per the MARB/Inland Port ALUCP (whichever is greater) by average vehicle occupancy (assumed to be 1.5 persons per vehicle in the absence of more precise data). Approximately 127 trailer spaces are located on 6.08 acres within APZ I and approximately 78 trailer spaces, 66 dock doors, and 206 parking spaces is located on 18.24 acres within APZ II.

Based on the number of parking spaces provided (127 trailer spaces) within APZ I, the total occupancy would be estimated at 191 people for an average acre intensity of 32 people per acre (127 trailer spaces x 1.5 persons per vehicles / 6.08 acres), which is not consistent with the Compatibility Zone B1 APZ I criterion of 25. However, once the trailers are parked, **the drivers will leave the site and therefore, it can be reasonably assumed that the average intensity of 25 people per acre would not be exceeded in Compatibility Zone B1 APZ I because people are not staying in the parking lot**.

Based on the number of parking spaces provided (78 trailer spaces, 66 dock doors, and 206 parking spaces) within APZ II, the total occupancy would be estimated at 525 people for an average acre intensity of 29 people per acre (350 x 1.5 persons per vehicles / 18.24 acres), **which is consistent with the Compatibility Zone B1 APZ II criterion of 50.**

Air Force Guidance Analysis

MARB, through the Department of Defense/Air Force, has its own limitations related to the APZ zones. MARB officials maintain that the MARB/Inland Port ALUCP is not consistent with current Air Force guidance found in Air Force Instruction 32-7063 dated December 18, 2015, which addresses Air Force policies on Land Use Compatibility in accordance with Department of Defense Instruction (DoDI) No. 4165.57. These inconsistencies include conflicts with regard to lot coverage, intensity, and permitted use definitions. The proposed Project complies with the restrictions on permitted uses, lot coverage and intensity limits. The Air Force applies the DoDI limits on intensity in APZ I to a maximum of 25 people (and APZ II to a maximum of 50 people) in any given acre of building area. (By contrast March ALUCP applies intensities across the whole land area of a project site not based on building area.)

As previously noted, it was assumed on a worst case calculation that in a single-acre (43,560 square feet), half of the total office space (4,400 square feet of office) is within the single-acre and the remainder of the acre is warehouse (39,160 square feet of warehouse). This would equate to a total occupancy of 50 people (4,400 square feet of office / 200 square feet plus 39,160 square feet of warehouse / 500 square feet x 35% usage intensity), **which is consistent with the Air Force DoDI limit in the APZ II of a maximum of 50 people in any given acre of building area.**

Prohibited and Discouraged Uses: The applicant does not propose any uses prohibited or discouraged in Compatibility Zones B1 APZ I and B1 APZ II. Industrial warehouse buildings are compatible within APZ I and APZ II pursuant to the 2018 Air Installation Compatible Use Zone (AICUZ) study disseminated by the United States Air Force.

Open Area: None of the Compatibility Zones for the March Air Reserve Base/Inland Port ALUCP require open area specifically. However, development within Compatibility Zone B1 APZ I and APZ II is limited to a maximum lot coverage of 50%. The maximum lot coverage proposed for the Project is approximately 40%, which is consistent with the maximum lot coverage criterion for warehouses of 50% in the Accident Potential Zones.

Additionally, City staff has reviewed the proposed Project and has determined that the Project is compatible with and does not conflict with Zone B1 (Inner Approach/Departure Zone) and APZ I and II of the ALUCP. Although the impacts associated with aircraft activities would be less than significant, the proposed Project is required to comply with the applicable PVCCSP EIR mitigation measures **MM Haz 1 through MM Haz 6** to ensure impacts related to airport hazards remain a level below significance. Therefore, because the Project involves the construction and operation of a warehouse building consistent with the site's land use designation in the PVCCSP, is required to comply with the MARB/Inland Port ALUCP, and the PVCCSP mitigation measures **MM Haz 1 through MM Haz 6**, impacts related to safety hazards are considered less than significant with mitigation incorporated.

PVCCSP Mitigation Measures

> **PVCCSP MM Haz 1:** The following notice shall be provided to all potential purchasers and tenants:
>
> "This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example, noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you. Business & Profession Code 11010 13(A)"
>
> **PVCCSP MM Haz 2**: Prior to the recordation of a final map, issuance of a building permit, or conveyance to an entity exempt from the Subdivision Map Act, whichever occurs first, the landowner shall convey an avigation easement to the MARB/March Inland Port Airport Authority.
>
> **PVCCSP MM Haz 3**: Any outdoor lighting installed shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane.
>
> **PVCCSP MM Haz 4**: The following notice shall be provided to all potential purchasers and tenants:

"This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example, noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you. Business & Profession Code 11010 13(A)."

PVCCSP MM Haz 5: The following uses shall be prohibited:

a. Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA- approved navigational signal light or visual approach slope indicator.

b. Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.

c. Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area.

d. Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.

e. All retention and water quality basins shall be designed to dewater within 48 hours of a rainfall event.

PVCCSP MM Haz 6: A minimum of 45 days prior to submittal of an application for a building permit for an implementing development project, the implementing development project applicant shall consult with the City of Perris Planning Department in order to determine whether any implementing project-related vertical structures or construction equipment would encroach into the 100-to-1 imaginary surface surrounding the MARB. If it is determined that there would be an encroachment into the 100-to-1 imaginary surface, the implementing development project applicant shall file a FAA Form 7460-1, Notice of Proposed Construction or Alteration. If FAA determines that the implementing development project would potentially be an obstruction unless reduced to a specified height, the implementing development project applicant and the Perris Planning Division would work with FAA to resolve any adverse effects on aeronautical operations.

8f. **No impact.** The Perris Valley Airport is the only small, private airport within the City and only has an Influence Area 1, which limits residential uses in the flight path (Perris 2005b, p. IV-42). The proposed Project site and off-site improvement area is

located approximately five miles north of the Perris Valley Airport Influence Area. Therefore, no impacts are anticipated and no mitigation is required.

8g. **Less than significant impact.** The City participates in the Riverside County multi-agency Multi-Hazard Functional Plan (MHFP), which outlines requirements for emergency access and standards for emergency responses (Perris 2009, p. 15). The PVCCSP determined that because emergency access will be maintained and improved throughout the Specific Plan area in accordance with the MHFP, development within the PVCCSP will not interfere with adopted emergency response plans.

Once the Project is constructed, emergency access to the Project site and off-site improvement area will be maintained via driveways along Ramona Expressway and Indian Avenue, consistent with requirements outlined in the MHFP. Additionally, the proposed Project is consistent with the requirements outlined in the PVCCSP; therefore, the proposed Project will have a less than significant impact on implementation of the adopted emergency response plan and no mitigation is required.

8h. **No impact.** Pursuant to the findings of the PVCCSP IS, the proposed Project site and off-site improvement area is not adjacent to any wildlands or undeveloped hillsides where wildland fires might be expected; further, the City's GP 2030 does not designate this area to be at risk from wildland fires (Perris 2009, p. 15). Although there are several isolated vacant lots in the proposed Project vicinity, the area surrounding the proposed Project is largely developed and would not likely aid the spread of wildfire. Therefore, no impacts due to wildland fire are anticipated and no mitigation is required.

5.9. HYDROLOGY AND WATER QUALITY	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation onsite or offsite?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite?	☐	☐	☒	☐

5.9. HYDROLOGY AND WATER QUALITY	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollutant runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☒	☐
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐

References: Perris 2005b, Perris 2009, Perris 2012, RCTLMA, FIRM 2014, Riverside County Flood Control and Water Conservation District 2012, California Department of Water Resources 2006, Albert A. Webb Associates (Webb) 2017 (Appendix K), and Webb 2017 (Appendix L).

Applicable PVCCSP Standards and Guidelines

The PVCCSP includes Standards and Guidelines relevant to water quality and hydrology. These Standards and Guidelines are summarized below, are incorporated as part of the proposed Project, and are assumed in the analysis presented in this section. There are no mitigation measures for hydrology and water quality included in the PVCCSP EIR.

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

4.2 On-Site Standards and Guidelines

4.2.2 Site Layout for Commerce Zones

4.2.2.7 Water Quality Site Design

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

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

- Design the site to minimize imperviousness, detain runoff, and infiltrate, reuse or evapotranspirate runoff where feasible.

- Cover or control sources of stormwater pollutants.

- Use Low Impact Design (LID) to infiltrate, evapotranspirate, harvest and use, or treat runoff from impervious surfaces.
- Ensure runoff does not create a hydrologic condition of concern.
- Maintain Stormwater BMPs.

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

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

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

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

Minimize impervious area

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

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

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

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

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

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

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

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

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

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

Covered Trash Enclosures. Trash enclosures covers must be provided.

Industrial Design Standards and Guidelines (from Chapter 8.0 of the PVCCSP)

8.2 Industrial Development Standards and Guidelines

8.2.1 Industrial Site Layout

8.2.1.8 Water Quality Site Design

Runoff from Loading Docks. Runoff from loading docks must be treated for pollutants of concern prior to discharge from the site.

Truck wells. Truck-wells are discouraged due to potential clogging of sump condition storm drain inlets. If used, run-off needs to run through landscape before discharging from site.

Explanation of Checklist Answers

9a. **Less than significant impact.** The Santa Ana Regional Water Quality Control Board (SARWQCB) sets water quality standards for all ground and surface waters within the Project's region. Water quality standards are defined under the Clean Water Act to include both the beneficial uses of specific water bodies and the levels of water quality that must be met and maintained to protect those uses (water quality objectives).The proposed Project site and off-site improvement area is located within the Santa Ana Watershed and San Jacinto Sub-Watershed. Runoff from the PVCC area, including the Project site and off-site improvement area, discharges into the PVSC, which is tributary to the San Jacinto River, Canyon Lake, and Lake Elsinore.

Activities associated with the construction of the proposed Project would include grading, which may have the potential to release pollutants (e.g., oil from construction equipment, cleaning solvents, paint) and silt off-site which could impact water quality. However, the Project developer is required to prepare a SWPPP pursuant to the statewide General Construction Permit (NPDES General Permit No. CAS000002, Waste Discharge Requirements, Order No. 2009-0009-DWQ, adopted September 2, 2009 and effective as of July 2, 2010) issued by the State Water Resources Control Board (SWRCB) for construction projects. Through compliance with the regulatory requirements of the NPDES Statewide General Construction Permit and on-site drainage facilities, the Project is not expected to violate any water quality standards or waste discharge requirements during construction.

Development of the proposed Project would add impervious surfaces to the site through associated parking, loading areas, and drive aisles. By increasing the percentage of impervious surfaces on the site, less water would percolate into the ground and more surface runoff would be generated. Paved areas and streets would collect dust, soil and other impurities that would then be assimilated into surface runoff during rainfall events. Operation of the Project has the potential to release pollutants resulting from replacing vacant land with roadways, walkways, and parking lots. These improvements may potentially impact water quality. The Project would be required to comply with the NPDES permit and Waste Discharge Requirements for Riverside County, of which the City is a co-permittee.[15] The City is responsible for discharges into its MS4 facilities to the extent of its legal authority and as required by federal regulations (40 C.F.R. § 122.26(d)(2)(i)), the City shall control discharges of pollutants into the MS4 to the maximum extent practicable (MEP). Although not held liable for pollutants coming from outside sources, if the City authorizes the connection of other dischargers into their MS4 systems, the City is required by the Order to approve a written WQMP describing post-construction BMPs to control the discharges of pollutants into the MS4 to the MEP. The permittees are responsible for several plans to reduce pollutants in urban runoff, including a WQMP for certain new development and redevelopment projects. The proposed Project meets the threshold of a Priority Development Project since it involves more than 10,000 square feet of impervious surface.

[15] City of Perris owns and/or operates a portion of the MS4 through which urban runoff is discharged into Waters of the U.S. that are located within the jurisdiction of the SARWQCB. Section 402(p) of the Clean Water Act requires that discharges of urban runoff from MS4 be regulated under a NPDES permit.

The Project applicant is required to provide a "preliminary Project-Specific WQMP" for review and approval by the City, followed by a "final Project-Specific WQMP" for additional review and approval by the City prior to the issuance of grading/building permits. A preliminary WQMP for the proposed Project was prepared by Webb (Appendix K) and submitted to the City for review and approval. The final WQMP shall be in substantial conformance with the preliminary WQMP that was submitted during the entitlement process.

Under direction from the SARWQCB, the WQMP prioritizes the use of LID principles and BMPs[16] to reduce the discharge of pollutants into urban runoff by mimicking the pre-development hydrologic regime. Therefore, the WQMP template (developed by principal permittee, Riverside County Flood Control and Water Conservation District and approved by the SARWQCB) forces the applicant to work through a hierarchy of LID BMPs to justify feasibility (or infeasibility) of infiltration methods as the primary treatment mechanism for the urban runoff. The WQMP also requires each onsite drainage area (i.e. roofs, parking lots, landscaping, etc.) be identified and to where it is draining; as either "self-treating" areas,[17] "self-retaining" areas,[18] or areas draining to BMPs (see Appendix K, WQMP site plan).

For the Project, the proposed water quality basin[19] must not only be a LID BMP but also demonstrate ability to capture the runoff generated by the design storm event (85th percentile, 24-hour storm, or depth of 0.62 inches). Applied over the different drainage management areas, and considering various factors, the Design Capture Volume (DCV) for the design storm event is calculated at roughly 44,291 cubic feet (Appendix K, p.13). The WQMP plans show a proposed DCV of 45,657 cubic feet, and therefore capable of capturing the design storm event (Appendix K, p. 13). Adequate sizing of the Project LID BMPs ensures the Project runoff will be adequately treated per current regulatory requirements, and will not contribute to downstream water quality impacts.

Additionally, the WQMP will implement measures to ensure water quality standards are met. For instance, the proposed Project will implement source control and operational BMPs such as designing landscape to minimize irrigation, runoff, and the use of fertilizers, maintaining landscaping using minimal or no pesticides, utilizing covered and leak proof trash dumpsters, sweeping and litter control of loading areas, and collecting wash water containing any cleaning agent or degreaser in order to prevent pollutants from entering runoff.

Infiltration was deemed infeasible at the Project site and off-site improvement area based on the infiltration study and use of "Harvest and Use" BMPs (as in a cistern-type system) was not required because the Project will use reclaimed water for the non-potable water demands (Appendix K, pp. 8-9).

[16] Low Impact Development: An approach to stormwater management and land development that combines hydrologically functional design with pollution prevention measures to compensate for land development impacts on hydrology and water quality. LID BMPs and Principles mimic the site's predevelopment hydrology by using techniques that store, infiltrate, evapotranspirate, bio-treat, bio-filter, bio-retain, or detain runoff close to its source (LID, 2012).

[17] Self-treating area: Natural or landscaped area that drains overland off-site or directly to the storm drain system.

[18] Self-retaining area: Area designed to retain runoff, such as graded depressions with landscaping or porous pavements.

Because infiltration is deemed infeasible, the Project will use LID bioretention and/or biotreatment BMPs. The proposed bioretention BMP consists of a water quality basin on the northern portion of the Project site to capture and detain all onsite runoff and discharge into Line E to the south (along Ramona Expressway) (as shown on **Figure 8**). A bioretention basin is a shallow, vegetated basin underlain by an engineered soil media (Riverside County Flood Control and Water Conservation District, 2012). Having healthy plant and biological activity maximizes plant uptake of pollutants, thus in addition to some infiltration, evapotranspiration through the plants, and evaporation as the treatment mechanisms, the basins would also act as a "bio-filter" prior to discharge.

The proposed Project incorporates site design, source controls and treatment control BMPs to address storm water runoff. The water quality basin is also included to treat storm water runoff before it leaves the site. Thus, through BMPs combined with compliance with existing regulations such as the implementation of the WQMP, the proposed Project will not violate water quality standards or waste discharge requirements. Therefore, impacts are less than significant and no mitigation is required.

9b. **Less than significant impact.** The proposed Project site and off-site improvement area is located within the bounds of the West San Jacinto Groundwater Basin, specifically the North Perris subbasin, and the Project site and off-site improvement area is within the Perris North Management Zone. The Perris North Management Zone is managed by EMWD under the West San Jacinto Groundwater Management Plan which evaluates groundwater resources including establishing quality, level, and extraction monitoring.

While the proposed Project will increase the amount of impervious surface (approximately 21.84 acres), the proposed approximately 0.55-acre water quality basin will be utilized and promote infiltration. Additionally, approximately 2.56 acres of landscape is proposed on the Project site and off-site improvement area to allow for percolation. Due to the proposed Project's small size (approximately 26.84 acres) in relationship to the total size of the San Jacinto Groundwater Basin (approximately 188,000 acres) and implementation of BMPs identified in the Project's WQMP as described in *Threshold 9a* above, there will not be a substantial effect upon groundwater recharge within the groundwater basin. Further, since the Project consists of a warehouse building and because it has a low water demand and will not use local groundwater sources for its potable water, it will not directly cause an increase in groundwater pumping and will not substantially deplete groundwater supplies. Therefore, impacts will be less than significant and no mitigation is required.

9c. **Less than significant impact.** There are no streams or rivers currently mapped at the Project site or off-site improvement area and the Project site and off-site improvement area is not impacted by any off-site flows. Based on review of historic aerials, drainage on the Project site and off-site improvement area appears to flow in a west to east direction. According to the Preliminary Drainage Study prepared by Webb (Appendix L), the Project site and off-site improvement area is relatively flat and currently slopes towards the east side of the Project site and off-site improvement area at approximately 0.6 percent grade. The existing drainage pattern for the Project site and off-site improvement area and the general area is characterized by sheet flow that follow the slope towards Indian Avenue and Ramona Expressway. On-site flows generated by the proposed Project will be

collected and conveyed using a combination of surface flows, ribbon gutters, curb and gutters, drop inlets, and a storm drain system. The storm drain system will be used to convey flows into the proposed water quality basin, located at the northern portion of the Project site which will then drain into a proposed pump station that will control the total outflow from the site. The discharge will go into the existing Lateral E-3.2, which then discharges into the Line E-3 storm drain. The pump station will discharge a maximum outflow of 5 cubic feet per second (cfs) to mitigate the increase in runoff and not adversely affect the downstream facilities and properties (Webb pp. 1-1 – 1-2, Appendix L) (see **Figure 8**).

Therefore, the proposed Project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation onsite or offsite. Thus, impacts will be less than significant and no mitigation is required.

9d. **Less than significant impact.** As described in *Threshold 9c* above, on-site flows generated by the proposed Project will be collected and conveyed using a combination of surface flows, ribbon gutters, curb and gutters, drop inlets, and a storm drain system. The storm drain system will be used to convey flows into the proposed water quality basin, located at the northern portion of the Project site which will then drain into a proposed pump station that will control the total outflow from the site. The discharge will go into the existing Lateral E-3.2, which then discharges into the Line E-3 storm drain. The pump station will discharge a maximum outflow of 5 cfs to mitigate the increase in runoff and not adversely affect the downstream facilities and properties (Webb pp. 1-1 – 1-2, Appendix L) (see **Figure 8**). The proposed Project's on-site and off-site driveway improvement area subsurface storm drain systems will adequately convey flows to the basin and provide flood protection for the 100-year storm event. In addition, the proposed water quality basin will adequately treat on-site flows. Therefore, the proposed Project will not impact flooding condition to upstream or downstream properties. Thus, the proposed Project will 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 substantially increase the rate or amount of surface runoff in a manner which would result in onsite or offsite flooding. Therefore, impacts will be less than significant and no mitigation is required.

9e. **Less than significant impact.** The storm water run-off in the Project area all discharge into the PVSC. The PVSC is an earthen flood control channel within the Perris Valley Master Drainage Plan that has been designed to accommodate flows from the Perris Valley watershed in a 100-year storm event. All of the development within the PVCCSP, including the Project, will eventually drain all stormwater flows into the PVSC.

The proposed Project will construct its own storm drain facilities in order to drain all 100-year flows. The proposed Project will involve connecting the two reaches of the existing Line E storm drain that exist on both sides of the Project, along Ramona Expressway. RCBs will connect the existing channel on the west of the Project site to the existing RCB to the east of the Project site. Line E will convey off-site flows. On-site flows will be conveyed into the proposed water quality basin located north of the Project site via a newly-constructed storm drain. All runoff generated by the Project site and off-site driveway improvement area will drain to the water quality basin and convey outflow into a proposed pump station. The pump station will drain into Lateral E-3.2 to collect local street flow. Lateral E-3.2 will convey flow to existing Line E-3 (along Indian Avenue), and then to Line E. The pump station will

discharge a maximum outflow of 5 cfs to mitigate the increase in runoff and not adversely affect the downstream facilities and properties (Webb pp. 6-7, Appendix K) (see **Figure 8**).

The proposed Project's on-site subsurface storm drain systems will adequately convey flows to the basin and provide flood protection for the 100-year storm event. Therefore, the proposed Project will not impact flooding condition to upstream or downstream properties. As such, impacts related to the Project's runoff will be less than significant and no mitigation is required.

9f. **Less than significant impact.** As described in *Threshold 9a* above, the proposed Project will implement source control and operational BMPs such as designing landscape to minimize irrigation, runoff, and the use of fertilizers, maintaining landscaping using minimal or no pesticides, utilizing covered and leak proof trash dumpsters, sweeping and litter control of loading areas, and collecting wash water containing any cleaning agent or degreaser in order to prevent pollutants from entering runoff. The proposed Project also incorporates site design, source controls and treatment control BMPs to address storm water runoff. A water quality basin is located on the northern portion of the Project site to treat storm water runoff before it leaves the site and the proposed Project is not anticipated to substantially degrade water quality. Therefore, impacts will be less than significant and no mitigation is required.

9g. **No impact.** The Project involves the construction and operation of a warehouse building and does not include any housing. Therefore, the Project will not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map (FIRM), or other flood hazard delineation map. No impacts are anticipated and no mitigation is required.

9h. **Less than significant impact.** As shown on Federal Emergency Management Agency (FEMA) Panel No. 06065C1430H, the proposed Project site and off-site improvement area is located within Zone D which is in an area where flood hazards are undetermined, but possible (FIRM 2014). According to the Preliminary Drainage Study prepared by Webb (Appendix L), the proposed Project's on-site subsurface storm drain systems will adequately convey flows to the water quality basin and provide flood protection for the 100-year storm event. In addition, the proposed water quality basin will adequately treat on-site flows. Therefore, the proposed Project will not impact flooding condition to upstream or downstream properties. Thus, the proposed Project will not place structures within a 100-year flood hazard area which would impede or redirect flood flows. Therefore, impacts are less than significant and no mitigation is required.

9i. **Less than significant impact.** According to the City's GP 2030 EIR Exhibit 4.5-12, the proposed Project site and off-site improvement area is not within the Dam Inundation Area for the Lake Perris Dam. Projected water flows from a dam failure at the Perris Reservoir are based on a scenario in which a full reservoir completely empties and does not account for run-off from other sources. The City's GP 2030 outlines several policies to ensure that residents and workers in the inundation zones could be evacuated in the unlikely event of a dam breach (Perris 2005b, p. IV-76). Therefore, due to the extreme improbability of a dam failure and through compliance with all applicable policies contained in the City's GP 2030, impacts related to dam inundation are less than significant and no mitigation is required.

9j. **Less than significant impact.** The Project site and off-site improvement area is located approximately 37 miles from the Pacific Ocean, with mountain ranges in between and would not be impacted by a tsunami. Mudflow generally consists of soft, wet earthen debris made fluid by rain or snow that build up great speed. The topography of the Project site/off-site improvement area and vicinity is relatively flat and mudflow is not likely. A seiche occurs when a wave oscillates in lakes, bays, or gulfs as a result of seismic disturbances. The Project site and off-site improvement area is located approximately 2.2 miles west of the Perris Reservoir, and so a seiche is not expected to impact the Project site or off-site improvement area. Therefore, impacts related to tsunami, mudflow, and sieche are less than significant and no mitigation is required.

5.10. LAND USE AND PLANNING	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☒	☐	☐

References: Perris 2011 and Perris 2012.

Applicable PVCCSP Standards and Guidelines

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

Explanation of Checklist Answers

10a. **No impact.** The proposed Project site is within the PVCCSP area and the Project site and off-site improvement area is currently vacant and undeveloped. The land uses surrounding the Project site and off-site improvement area include a mix of undeveloped, vacant land and industrial uses to the north, industrial uses to the south and west, and a mix of vacant land, commercial uses, and non-conforming residential uses to the east. Rather than dividing a community, the PVCCSP intends to bring the area together as a unified neighborhood for higher quality business development including industrial, commercial, and office uses (Perris 2012, pp. 1.0-1 – 1.0-2). Therefore, the proposed Project is consistent with the surrounding land uses and no impacts are anticipated in relation to division of an established community and no mitigation is required.

10b. **Less than significant impact.** The proposed Project site and off-site improvement area is located in the City within the PVCCSP area. Thus, land use is guided by both

the City's GP 2030 and the PVCCSP. The proposed Project includes a warehouse use which is consistent with the Light Industrial (LI) land use designation called out in both the General Plan as identified in **Table 5.10-A, General Plan Consistency**, below and PVCCSP.

Table 5.10-A – General Plan Consistency

Policy No.	Policy	Statement of Consistency
Circulation Element		
Policy I.A:	*Design and develop the transportation system to respond to concentrations of population and employment activities, as designated by the Land Use Element and in accordance with the designated Transportation System, Exhibit 4.2 Future Roadway Network.*	The proposed Project is consistent with the land use designation for the site in the PVCCSP and includes necessary improvements to Perry Street, Indian Avenue, and Ramona Expressway along the Project site/off-site improvement area boundaries that are in accordance with City's long range plans for development. The City's transportation system has been designed to accommodate additional traffic due to new employment opportunities at the Project site during Project operation. Thus, the Project is **consistent** with General Plan (GP) Policy I.A.
Policy I.B:	*Support development of a variety of transportation options for major employment and activity centers including direct access to commuter facilities, primary arterial highways, bikeways, park-and-ride facilities, and pedestrian facilities.*	Bike racks will be installed at the Project site to encourage employees to bike to work and the Project developer will be responsible for constructing sidewalk improvements on Indian Avenue and Ramona Expressway along the Project's frontage. The Project applicant will also pay applicable development impact fees (DIF), which may be used by the City to support development of transportation options; therefore, the Project is **consistent** with GP Policy I.B.
Policy II.A:	*Maintain the following target Levels of Service:* • *LOS D along all City-maintained roads (including intersections) and LOS D along Interstate 215 and SR-74 (including intersections with local streets and roads). An exception to the local road*	The TIA (Appendix N) prepared for the Project to assess potential impacts of Project-generated traffic on roadways in the local vicinity determined that the proposed Project will maintain acceptable Level of Service (LOS) on the traffic study area intersections under existing plus Project and existing plus

Policy No.	Policy	Statement of Consistency
	standard is LOS E, at intersections of any Arterials and Expressways with SR-74, the Ramona-Cajalco Expressway, or at Interstate-215 freeway ramps. • *LOS E may be allowed within the boundaries of the Downtown Specific Plan Area to the extent that it would support transit-oriented development and walkable communities. Increased congestion in this area will facilitate an increase in transit ridership and encourage development of a complementary mix of land uses within a comfortable walking distance from light rail stations.*	ambient growth plus Project conditions. Therefore, the Project is **consistent** with GP Policy II.A.
Policy II.B:	*Maintain the existing transportation network while providing for future expansion and improvement based on travel demand, and the development of alternative travel modes.*	The proposed Project will not significantly impact the existing transportation network, even considering existing plus ambient growth plus cumulative plus Project (2020) traffic conditions. Additionally, the Project will be responsible for area-wide improvements including constructing Ramona Expressway to its ultimate half-section width as an Expressway between the western Project boundary and Indian Avenue, constructing Indian Avenue to its ultimate half-section width as a Secondary Arterial between the eastern Project boundary (at the proposed Driveway 3) and Ramona Expressway. Although Driveway 2 is not anticipated to warrant a traffic signal based on future projected daily traffic, the Project applicant is proposing the installation of a traffic signal as it is proposed to accommodate access to trucks heading to and from the north (Harley Knox Boulevard via Indian Avenue).

Policy No.	Policy	Statement of Consistency
		Additionally, the Project applicant will participate in the phased construction of off-site traffic signals through payment of Project's fair share of traffic signal mitigation fees. Further, installation of sidewalks and bike racks at the Project site will support development of alternative travel modes and the Project is **consistent** with GP Policy II.B.
Policy III.A:	*Implement a transportation system that accommodates and is integrated with new and existing development and is consistent with financing capabilities.*	The proposed Project is consistent with the land use designation in the City's GP 2030 and PVCCSP, and traffic associated with development of the Project site as a high-cube warehouse can be accommodated by the City's planned transportation system. Additionally, the proposed Project will include constructing Ramona Expressway to its ultimate half-section width as an Expressway between the western Project boundary and Indian Avenue, constructing Indian Avenue to its ultimate half-section width as a Secondary Arterial between the eastern Project boundary (at the proposed Driveway 3) and Ramona Expressway. Although Driveway 2 is not anticipated to warrant a traffic signal based on future projected daily traffic, the Project applicant is proposing the installation of a traffic signal as it is proposed to accommodate access to trucks heading to and from the north (Harley Knox Boulevard via Indian Avenue). The Project applicant will participate in the phased construction of off-site traffic signals through payment of Project's fair share of traffic signal mitigation fees to offset the Project's incremental impacts to the City's transportation system. Therefore, the Project is **consistent** with the City's GP Policy III.A.

Policy No.	Policy	Statement of Consistency
Policy V.A:	*Provide for safe movement of goods along the street and highway system.*	The proposed Project has been designed to ensure that adequate sight distance is provided at each Project access point and that adequate signing and striping is provided. All Project trucks will be restricted to access the Harley Knox interchange along a designated truck route. Because the Project is consistent with the on-site and surrounding land use and zoning designations, and implementation of the Project will not introduce incompatible uses to the Project Area, the proposed Project is **consistent** with GP Policy V.A.
Policy VII.A	*Implement the Transportation System in a manner consistent with Federal, State, and local environmental quality standards and regulations.*	Implementation of the City's Transportation System and consistency of this System with Federal, State, and local environmental quality standards and regulations is the responsibility of the City. The proposed high-cube warehouse is consistent with the land use designation of the proposed Project site in the City's GP and all roadway improvements will be required to be constructed in accordance with City standards and regulations which comply with all Federal, State and Local policies. As roadways in the Project vicinity have been planned to accommodate Project-generated traffic and comply with all applicable Federal, State, and local standards. , the Project is consistent with GP Policy VII.A.
Noise Element		
Policy I.A	*The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development.*	Noise levels of up to 70 A-weighted decibels (dBA) Commmunity Noise Equivalent Level (CNEL) are identified in the City's GP 2030 as "normally acceptable" and of up to 80 dBA CNEL as "conditionally acceptable" for industrial land uses. A Noise Impact

Policy No.	Policy	Statement of Consistency
		Analysis was conducted for the proposed Project which noted that the Project site and off-site improvement area is located within MARB/Inland Port ALUCP's projected 70 to 75 dBA CNEL noise contours. Therefore, the Project is **consistent** with GP Policy I.A.
Policy II.A	*Appropriate measures shall be taken in the design phase of future roadway widening projects to minimize impacts on existing sensitive noise receptors.*	The Project will be responsible for area-wide improvements including constructing Ramona Expressway to its ultimate half-section width as an Expressway between the western Project boundary and Indian Avenue, constructing Indian Avenue to its ultimate half-section width as a Secondary Arterial between the eastern Project boundary (at the proposed Driveway 3) and Ramona Expressway. The Project will be required to comply with all City policies to minimize impacts to sensitive receptors. Further, implementation of PVCCSP mitigation measures **MM Noise 1** through **MM Noise 4** ensure impacts to the nearest sensitive receptors (nonconforming residential uses), located approximately 187 feet east of the Project site, are reduced to less than significant levels during the Project construction phases. Therefore, the Project is **consistent** with GP Policy II.A.
Policy V.A	*New large scale commercial or industrial facilities located within 160 feet of sensitive land uses shall mitigate noise impacts to attain an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria.*	According to the City's Land Use Compatibility for Community Noise Exposure, noise-sensitive land uses such as single-family residences are normally acceptable with exterior noise levels below 60 dBA CNEL and conditionally acceptable with noise levels below 65 dBA CNEL. The nearest sensitive receptors to the Project site and off-site improvement area are nonconforming residential uses (residential uses on Light Industrial (LI)

Policy No.	Policy	Statement of Consistency
		designated land use) located approximately 187 feet east of the Project site. Since the closest noise-sensitive residential use is located at a distance greater than 160 feet, an analysis based on the 60 dBA CNEL criteria is not required. Therefore, the Project is **consistent** with GP Policy V.A.
Conservation Element		
Policy II.A:	*Comply with state and federal regulations to ensure protection and preservation of significant biological resources.*	The proposed Project is consistent with the Multiple Species Habitat Conservation Plan (MSHCP) and will pay applicable fees pursuant to City's Ordinance No. 1123 to offset incremental impacts to biological resources from Project construction and operation. Appropriate mitigation has been identified in Section 5.4, Biological Resources, of this Initial Study (IS) to ensure impacts in regards to burrowing owls and nesting birds are reduce to a level below significance. Therefore, the Project is **consistent** with GP Policy II.A.
Policy III.A:	*Review all public and private development and construction projects and any other land use plans or activities within the MSHCP area, in accordance with the conservation criteria procedures and mitigation requirements set forth in the MSHCP.*	The proposed Project is located within the jurisdiction of the MSHCP Mead Valley Plan Area and appropriate mitigation has been identified in the IS for the Project so that the Project is consistent with the MSHCP; therefore the proposed Project is also **consistent** with GP Policy III.A.
Policy IV.A:	*Comply with State and Federal regulations and ensure preservation of the significant historical, archaeological, and paleontological resources.*	There are no historic properties identified within the Project area, and appropriate mitigation has been identified in Section 5.5, Cultural Resources, of this IS for the Project to ensure that impacts to archaeological and paleontological resources will be less than significant; therefore, the Project is **consistent** with GP Policy

Policy No.	Policy	Statement of Consistency
		IV.A.
Policy V.A:	*Coordinate land-planning efforts with local water purveyors.*	Land planning efforts are the responsibility of the City's Planning Department, not the responsibility of the Project applicant. Nonetheless, the water provider for the Project site and off-site improvement area, Eastern Municipal Water District (EMWD), issued a will-serve letter for the Project on September 4, 2018 indicating that the agency has sufficient supply to meet the water needs of the Project. Therefore, the Project is **consistent** with GP Policy V.A.
Policy VI.A:	*Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).*	The Project developer is required to prepare a Stormwater Pollution Prevention Plan (SWPPP) pursuant to the statewide General Construction Permit (NPDES General Permit No. CAS000002, Waste Discharge Requirements, Order No. 2009-0009-DWQ, adopted September 2, 2009 and effective as of July 2, 2010) issued by the SWRCB for construction projects that will reduce any potential construction-related water quality impacts to a less than significant level. Therefore, the Project is **consistent** with GP Policy VI.A.
Policy VIII.A:	*Adopt and maintain development regulations that encourage water and resource conservation.*	Administration of development regulations is the responsibility of the City, not the individual Project applicant. Nonetheless, the proposed Project will incorporate a water conservation strategy to reduce water use by at least 30% and to reduce energy usage by 20% relative to the 2013 Title 24. Therefore, the Project is **consistent** with GP Policy VIII.A.
Policy VIII.B:	*Adopt and maintain development regulations that encourage recycling and reduced waste generation by*	Administration of development regulations is the responsibility of the City, not the individual Project applicant.

Policy No.	Policy	Statement of Consistency
	construction projects.	Nonetheless, the Project will comply with applicable City and state policies intended to encourage waste reduction. This includes Chapter 7.44.050 of the City Municipal Code, which requires that project construction divert a minimum of 50 percent of construction and demolition debris; Chapter 7.44.060 of the Municipal Code, which requires the submittal of a waste management plan; and the 2016 CalGreen Code, which requires that 65 percent of construction waste is diverted. Therefore, the Project is **consistent** with GP Policy VIII.B.
Land Use Element		
Policy II.A:	*Require new development to pay its full, fair-share of infrastructure costs.*	The Project applicant will pay applicable DIFs pursuant to City Ordinance No. 1182 to mitigate the cost of public facilities to support new development. Thus, the Project is **consistent** with GP Policy II.A.
Policy III.A:	*Accommodate diversity in the local economy.*	The proposed Project is consistent with the existing Light Industrial (LI) land use designation for the Project site and off-site improvement area within the PVCCSP, which was adopted by the City to ensure quality, organized development within the Project site/off-site improvement area vicinity. Therefore, the proposed Project is **consistent** with GP Policy III.A.
Policy V.A:	*Restrict development in areas at risk of damage due to disasters.*	The proposed Project site and off-site improvement area is not located within an area of significant risk due to human or natural disasters; therefore, although it would be the responsibility of the City to determine whether development restrictions should be in place, the Project is **consistent** with GP Policy V.A.
Safety Element		

Policy No.	Policy	Statement of Consistency
Policy I.B:	*The City of Perris shall restrict future development in areas of high flood hazard until it can be shown that risk is or can be mitigated.*	It is the responsibility of the City, not the Project applicant, to determine if development should be restricted within areas of high flood hazard. Nonetheless, the proposed Project is not within a high flood hazard area. The Project's onsite subsurface storm drain systems will adequately convey flows to the water quality basin located at the northern portion of the Project site and provide flood protection for the 100-year storm event. The proposed Project is **consistent** with GP Policy I.B.
Policy I.D:	*Consult the AICUZ Land Use Compatibility Guidelines and ALUP Airport Influence Area development restrictions when considering development project applications.*	City staff has reviewed the proposed Project and has determined that the Project is compatible with and does not conflict with the MARB/Inland Port ALUCP. Therefore, the Project is **consistent** with GP Policy I.D.
Policy I.E:	*All development will be required to include adequate protection from damage due to seismic incidents.*	The proposed Project will be designed in compliance with the applicable sections of the current edition of the California Building Code, which provides criteria for the seismic design of buildings. Thus, the proposed Project is **consistent** with GP Policy I.E.
Policy II.A:	*The City shall require roadway improvements to expedite quick and safe travel by emergency responders.*	Development pursuant to the PVCCSP will maintain emergency access in accordance with the County of Riverside Multi-Jurisdictional Hazard Mitigation Plan. Therefore, because the proposed Project is consistent with the land use designation for the site in the PVCCSP, the proposed Project is **consistent** with GP Policy II.A.

The Project site and off-site improvement area is located approximately 1 mile southeast of MARB and is within the MARB Airport Influence Policy Area. Thus, the Project site and off-site improvement area is subject to the current 2014 MARB/Inland Port ALUCP. The ALUCP divides the area close to the airport into Influence Areas based on proximity to the airport and perceived risks. The heaviest air traffic volumes are expected in Influence Area I; in Airport Influence Area II, less

air traffic at higher altitudes is expected (Perris 2005b, p. IV-34). The City created an Airport Overlay Zone component to the City's land use planning to accommodate development within the City consistent with the land use designations of the 2014 ALUCP. On July 14, 2016, the Riverside County Airport Land Use Commission determined that the City's Airport Overlay Zone is consistent with the 2014 ALUCP. As discussed in the PVCCSP EIR, light industrial land uses are permitted within Area I, Area II, and Area III as described in the 1984 ALUP (Perris 2011, p. 4.6-17).

An ALUC/MARB/AFB Intensity Restriction was calculated for the proposed Project based on an analysis for the proposed Project's compliance with the restrictions specified for properties within the APZ I and APZ II areas of the 2014 MARB/Inland Port ALUCP. According to the 2014 MARB/Inland Port ALUCP, the Project site and off-site improvement area is within Zone B1 (Inner Approach/Departure Zone) and APZ I and II as delineated in the 2005 AICUZ for MARB (AICUZ, p. 3-3) (see **Figure 7**). The MARB/Inland Port ALUCP limits the total number of people permitted on a Project site and off-site improvement area at any time in the APZ I and APZ II areas. Limitations imposed by the MARB/Inland Port ALUCP are as follows:

- Limited to 25 people per acre in the APZ I,
- Limited to 50 people per acre in the APZ II, and
- Comply with the maximum 50 percent lot coverage per the applicable APZs.

The northern portion of the Project site and off-site improvement area, where parking and access is proposed, is within APZ I while the southern portion of the site, where the warehouse building, parking, and access are proposed, is within APZ II (see **Figures 7 and 8**).

The following analyzes how the proposed Project complies with these restrictions of the MARB/Inland Port ALUCP. For a more conservative analysis, the proposed off-site improvement area was not used as part of the calculations because the off-site improvement area includes Driveway 2 and intersection improvements which would not trigger substantial number of people within this area.

Methodology – Riverside County Airport Land Use Compatibility Plan / March Air Reserve Base

Pursuant to Appendix C, Table C-1, of the Riverside County ALUCP, the following parameters were used to calculate the occupancy for the proposed Project:

- Warehouse – 35% of the usage intensity from 1 person/500 square feet[20], and
- Office – 1 person/200 square feet[21].

[20] High-cube warehouses and distribution centers, other than e-commerce centers and fulfillment centers, shall be evaluated on the basis of 35% of the usage intensity that results from the occupancy level indicated in Table C1 of the MARB/Inland Port ALUCP. Since the proposed Project is proposed as a high-cube warehouse, the basis of 35% of the usage intensity that results from the occupancy level for warehouse is used.

[21] Surveys of actual occupancy levels conducted by various agencies have indicated that many retail and office uses are generally occupied at no more than 50% of their maximum occupancy levels, even at the

- Compatibility Zone B1 APZ I Criteria = Limited to an average of 25 people per acre.

- Compatibility Zone B1 APZ II Criteria = Limited to an average of 50 people per acre.

- Single-Acre Persons Limit = Limited to 100 people in a single acre.

MARB/Inland Port ALUCP Analysis

The proposed Project is an approximately 428,730-square-foot warehouse building consisting of approximately 419,930 square feet of warehouse area and approximately 8,800 square feet of office area. Based on the rates noted above for warehouse and office uses, approximately 419,930 square feet of warehouse space would equate to 294 people (419,930 square feet/500 square feet x 35% usage intensity) and approximately 8,800 square feet of office space would equate to 44 people (8,800 square feet/200 square feet) within the Project site.

Approximately 18.24 acres of the Project site is within APZ II, where the warehouse and supporting office building is located, and would be subject to the average people per acre limit as outlined above. As such, an average intensity of 19 people per acre (294 people + 44 people / 18.24 acres) for the warehouse and supporting office uses is anticipated **which is consistent with the Compatibility Zone B1 APZ II criterion of 50 people per acre.**

Another measurement required by the MARB/Inland Port ALUCP, is a single-acre intensity limit. For the Compatibility Zone B1 APZ I and APZ II, the ALUCP limits the maximum single-acre intensity to 100 people per single acre.

In order to determine if the Project fits within the 100 people per single acre limit, it was assumed in a worst case calculation that in a single-acre (43,560 square feet), half of the total office space (4,400 square feet of office) is within the single-acre and the remainder of the acre is warehouse (39,160 square feet of warehouse). This would equate to a total occupancy of 50 people (4,400 square feet of office / 200 square feet plus 39,160 square feet of warehouse / 500 square feet x 35% usage intensity), **which is consistent with the Compatibility Zone B1 APZ II single-acre intensity criterion of 100.**

A second method for determining total occupancy involves multiplying the number of parking spaces provided or required per the MARB/Inland Port ALUCP (whichever is greater) by average vehicle occupancy (assumed to be 1.5 persons per vehicle in the absence of more precise data). Approximately 127 trailer spaces are located on 6.08 acres within APZ I and approximately 78 trailer spaces, 66 dock doors, and 206 parking spaces is located on 18.24 acres within APZ II.

Based on the number of parking spaces provided (127 trailer spaces) within APZ I, the total occupancy would be estimated at 191 people for an average acre intensity

busiest times of day. Therefore, it is reasonable to adjust by 50% the number of people calculated for office and retail uses to reflect the occupancy levels before making the final people per acre determination. According to the ALUCP, office uses require a minimum of 100 square feet per occupant. Based on the 50% adjustment for office uses, the following rate of one person/200 square feet is used for purposes of this analysis.

of 32 people per acre (127 trailer spaces x 1.5 persons per vehicles / 6.08 acres), which is not consistent with the Compatibility Zone B1 APZ I criterion of 25. However, once the trailers are parked, **the drivers will leave the site and therefore, it can be reasonably assumed that the average intensity of 25 people per acre would not be exceeded in Compatibility Zone B1 APZ I because people are not staying in the parking lot**.

Based on the number of parking spaces provided (78 trailer spaces, 66 dock doors, and 206 parking spaces) within APZ II, the total occupancy would be estimated at 525 people for an average acre intensity of 29 people per acre (350 x 1.5 persons per vehicles / 18.24 acres), **which is consistent with the Compatibility Zone B1 APZ II criterion of 50.**

Air Force Guidance Analysis
MARB, through the Department of Defense/Air Force, has its own limitations related to the APZ zones. MARB officials maintain that the MARB/Inland Port ALUCP is not consistent with current Air Force guidance found in Air Force Instruction 32-7063 dated December 18, 2015, which addresses Air Force policies on Land Use Compatibility in accordance with DoDI No. 4165.57. These inconsistencies include conflicts with regard to lot coverage, intensity, and permitted use definitions. The proposed Project complies with the restrictions on permitted uses, lot coverage and intensity limits. The Air Force applies the DoDI limits on intensity in APZ I to a maximum of 25 people (and APZ II to a maximum of 50 people) in any given acre of building area. (By contrast March ALUCP applies intensities across the whole land area of a project site not based on building area.)

As previously noted, it was assumed on a worst case calculation that in a single-acre (43,560 square feet), half of the total office space (4,400 square feet of office) is within the single-acre and the remainder of the acre is warehouse (39,160 square feet of warehouse). This would equate to a total occupancy of 50 people (4,400 square feet of office / 200 square feet plus 39,160 square feet of warehouse / 500 square feet x 35% usage intensity), **which is consistent with the Air Force DoDI limit in the APZ II of a maximum of 50 people in any given acre of building area.**

Prohibited and Discouraged Uses: The applicant does not propose any uses prohibited or discouraged in Compatibility Zones B1 APZ I and B1 APZ II. Industrial warehouse buildings are compatible within APZ I and APZ II pursuant to the 2018 Air Installation Compatible Use Zone (AICUZ) study disseminated by the United States Air Force.

Open Area: None of the Compatibility Zones for the March Air Reserve Base/Inland Port ALUCP require open area specifically. However, development within Compatibility Zone B1 APZ I and APZ II is limited to a maximum lot coverage of 50%. The maximum lot coverage proposed for the Project is approximately 40%, which is consistent with the maximum lot coverage criterion for warehouses of 50% in the Accident Potential Zones. Based on the above discussion, impacts related to MARB/Inland Port ALUCP/AFB are considered to be less than significant.

10c. **Less than significant impact with mitigation.** As discussed in *Threshold 4f* above, the Project site and off-site improvement area is located within the Mead Valley Area Plan of the Western Riverside MSHCP. The Project site and off-site improvement area is not within a MSHCP Criteria Cell. Because the Project site and off-site

improvement area is not located within a Criteria Cell, the Project site and off-site improvement area is not in an area contemplated to be set aside for Conservation. Since the Project site and off-site improvement area is not located within a Criteria Cell, the Project is not subject to the HANS or JPR process. Refer to the analysis in *Threshold 4f* for Project's consistency with the MSHCP Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pool), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.3.2 (Additional Survey Needs and Procedures), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.4 (Fuels Management). Implementation of mitigation measure **MM Bio 1** would reduce impacts related to burrowing owls to less than significant levels and implementation of mitigation measure **MM Bio 2** would reduce impacts related to nesting birds to less than significant levels which support the determination that the Project will not conflict with an existing habitat conservation plan.

Additionally, the proposed Project site and off-site improvement area is within a SKR Fee Area as outlined in the SKR Habitat Conservation Plan. Payment of the applicable SKR fee will ensure that impacts to SKR are reduced to less than significant. In addition, as described in *Threshold 4f* above, the proposed Project applicant will be required to pay applicable MSHCP fees pursuant to Ordinance No. 1123. Therefore, the proposed Project will not conflict with the provisions of an adopted conservation plan and impacts will be less than significant with mitigation incorporated.

Project Mitigation Measures

Refer to **MM Bio 1 and MM Bio 2** under Threshold 4a.

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

References: Perris 2005b and GPA 960.

Applicable PVCCSP Standards and Guidelines

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

Explanation of Checklist Answers

11a. **No impact.** The proposed Project site and off-site improvement area is located within Mineral Resource Zone-3 (MRZ-3), as classified by the State Mining and Geology Board (GPA 960, Figure OS-6). Within MRZ-3, available geologic information suggests that mineral deposits exist, or are likely to exist; however, the

significance of the deposit is unknown. Due to the existing and planned developments surrounding the majority of the Project site and off-site improvement area, it is unlikely that a mining operation could feasibly function if significant resources were discovered in the future. Therefore, because there are no known mineral resources within the Project site and off-site improvement area, and the City's governing land use document (PVCCSP) does not allow for mining, no impacts are anticipated and no mitigation is required.

11b. **No impact.** No sites have been designated as locally-important mineral resource recovery sites on any local plan (Perris 2005b, p. VI-28). Therefore, no impact to the availability of a locally-important mineral resource recovery site will occur and no mitigation is required.

5.12. NOISE	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☒	☐	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

References: AICUZ, Perris 2005a, Perris 2009, and Urban Crossroads 2019 (Appendix M).

Applicable PVCCSP Standards and Guidelines

The PVCCSP Standards and Guidelines relevant to the analysis of noise impacts presented in this IS and summarized below are incorporated as part of the proposed Project and assumed in the analysis presented in this section.

Residential Buffer Development Standards and Guidelines (Section 4.2.8)

- 50-foot setback. A 50-foot setback is required for commercial, industrial and business professional office developments immediately abutting existing residential property lines.

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

Explanation of Checklist Answers

12a. **Less than significant impact with mitigation.** Construction and operation of the proposed Project will introduce new noise sources to the Project vicinity. The closest sensitive receptors to the proposed Project site and off-site improvement area are nonconforming residential uses approximately 187 feet to the east of the Project site. To evaluate noise impacts, a Noise Impact Analysis was prepared for the Project by Urban Crossroads (Appendix M).

Construction Activities

This section analyzes potential impacts resulting from the short-term construction activities associated with the development of the Project. Noise construction activities were evaluated against the construction noise standards in the City's Municipal Code, Section 7.34.060 which identifies a noise level standards of 80 dBA L_{eq} at residential properties to the noise-sensitive receiver locations located in the City (Urban Crossroads p. 13, Appendix M).

Noise generated by the Project construction equipment will include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. The number and mix of construction equipment is expected to occur in the following stages:

- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

The construction noise analysis was prepared using reference noise level measurements taken by Urban Crossroads to describe the typical construction activity noise levels for each stage of Project construction. The construction reference noise level measurements represent a list of typical construction activity noise levels. Noise levels generated by heavy construction equipment can range from approximately 68 dBA to in excess of 80 dBA when measured at 50 feet. However, these noise levels diminish with distance from the construction site at a rate of 6 dBA per doubling of distance. For example, a noise level of 80 dBA measured at 50 feet from the noise source to the receiver would be reduced to 74 dBA at 100 feet from the source to the receiver, and would be further reduced to 68 dBA at 200 feet from the source to the receiver (Urban Crossroads p. 49, Appendix M).

Based on Urban Crossroad's noise analysis and as shown on **Table 5.12-A – Unmitigated Construction Equipment Noise Level Summary (dBA L_{eq})**, the unmitigated construction noise level are expected to range from 35.7 to 68.1 dBA L_{eq} at the nearby sensitive receiver locations which will not exceed the 80 dBA L_{eq} noise

level threshold for residential properties as identified in Section 7.34.060 of the City's Noise Control Ordinance (Urban Crossroads p. 56, Appendix M). As such, impacts from Project construction noise levels are considered less than significant.

Table 5.12-A – Unmitigated Construction Equipment Noise Level Summary (dBA L_{eq})

Receiver Location[1]	Construction Hourly Noise Level (dBA L_{eq})					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Construction Noise Levels[2]
R1	68.1	68.1	56.7	60.1	56.0	68.1
R2	55.8	55.8	44.4	47.8	43.7	55.8
R3	48.2	48.2	36.8	40.2	36.1	48.2
R4	49.6	49.6	38.2	41.6	37.5	49.6
R5	47.8	47.8	36.4	39.8	35.7	47.8

Source: Urban Crossroads 2019, Table 10-7 (Appendix M).

[1] Noise receiver locations are shown on Exhibit 10-A of Appendix M.

[2] Estimated construction noise levels during peak operating conditions.

Although Project construction noise impacts will be less than significant, the Project is required to comply PVCCSP EIR mitigation measures **MM Noise 1 through MM Noise 4** to ensure Project construction noise and vibration remain at a level below significance.

PVCCSP Mitigation Measures

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

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

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

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

Operational Activities

The Project is proposed to consist of a warehouse building at approximately 428,730 square feet. No cold storage is proposed as part of the Project. At this time, future tenants of the proposed Project are unknown. Therefore, to present the potential worst-case noise conditions, Urban Crossroads assumed the Project would be operational 24 hours per day, seven days per week in its Noise Impact Analysis. The Project business operations 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 Project-related noise sources are expected to generally include idling trucks, delivery truck activities, backup alarms, as well as loading and unloading of dry goods, roof-top air conditioning units, and parking lot vehicle movements.

Since the future tenants of the proposed Project are unknown, Urban Crossroads analyzed the Project's operational noise levels based on reference noise level measurements of similar operational activities. The reference noise levels are intended to describe the expected operational noise sources that may generally include idling trucks, delivery truck activities, backup alarms, as well as loading and unloading of dry goods, roof-top air conditioning units, and parking lot vehicle movements. In order to estimate the Project's off-site operational noise impacts associated with the proposed Project, the following reference noise level measurements were collected from existing similar operational noise sources by Urban Crossroads.

- Motivational Fulfillment & Logistics Services Distribution Facility (Dry Goods)

  Short-term reference noise level measurements were collected on January 7, 2015 by Urban Crossroads at the Motivational Fulfillment & Logistics Services distribution facility located at 6810 Bickmore Avenue in the City of Chino. The noise level measurements represent the typical weekday dry goods logistics warehouse operation in a single building with a loading dock area on the western side of the building façade. Up to ten trucks were observed in the loading dock area including a combination of track trailer semi-trucks, two-axle delivery trucks, and background forklift operations.

  The unloading/docking activity noise level measurement was taken over a fifteen-minute period and represents multiple noise sources taken from the center of loading dock activities generating a reference noise level of 62.8 dBA L_{eq} at a uniform distance of 50 feet. At this measurement location, the noise sources associated with employees unloading a docked truck container included the squeaking of the truck's shocks when weight was removed from the truck, employees playing music over a radio, as well as a forklift horn and backup alarm. In addition, during the noise level measurement, a truck entered the loading dock area and proceeded to reverse and dock in a nearby loading bay, adding truck engine and air brakes noise.

  While the specific noise levels at the Project site and off-site improvement area will depend on the actual tenant, the intensity and the daytime/nighttime hours of operation, a reference noise level of 62.8 dBA L_{eq} for the unloading/docking activity at a normalized distance of 50 feet is used to describe the peak Project operational noise activity since it represents similar operational characteristics. The reference noise level of 62.8 dBA L_{eq} at 50 feet is intended to describe the

worst-case noise levels associated with the expected typical warehouse and distribution storage operations at the Project site and off-site improvement area (Urban Crossroads pp. 41-42, Appendix M).

- Roof-Top Air Conditioning Units

  To assess the impacts created by the roof-top air conditioning units at the Project building, reference noise level measurements were taken by Urban Crossroads at the Santee Walmart located at 170 Town Center Parkway in the City of Santee on July 27, 2015. The noise level measurements describe a mechanical roof-top air conditioning unit on the roof of an existing Walmart store with additional units operating in the background. The reference noise level represents Lennox SCA120 series 10-ton model packaged air conditioning units. Based on observations made by Urban Crossroads of similar warehouse buildings with interior offices, it is expected that actual roof-top air conditioning units used on the roof-top of the Project building would range from two to six tons per unit. Therefore, the reference 10-ton unit noise level used in this analysis likely overstates actual operational noise levels of the Project's roof-top air conditioning units. Using the uniform reference distance of 50 feet, the noise level is 57.2 dBA L_{eq}. The operating conditions of the reference noise level measurement reflect peak summer cooling requirements with measured temperatures approaching 96 degrees Fahrenheit with average daytime temperatures of 82 degrees Fahrenheit. The roof-top air condition units were observed to operate the most during the daytime hours, for a total of 39 minutes per hour, and are anticipated to operate during the daytime and nighttime hours at the Project site and off-site improvement area. The noise attenuation provided by a parapet wall is not reflected in this reference noise level measurement (Urban Crossroads p. 42, Appendix M).

- Parking Lot Vehicle Movements (Autos)

  To determine the noise levels associated with parking lot vehicle movements, Urban Crossroads collected reference noise level measurements over a 24-hour period on May 17, 2017 at the parking lot for the Panasonic Avionics Corporation office and warehouse building in the City of Lake Forest. The peak hour of activity measured over the 24-hour noise level measurement period occurred between 12:00 p.m. to 1:00 p.m., or the typical lunch hour for employees working in the area. The measured reference noise level at 50 feet from parking lot vehicle movements was measured at 41.7 dBA L_{eq}. The parking lot noise levels are mainly due to cars pulling in and out of spaces during peak lunch hour activity and employees talking, and represents peak activity observed over a 24-hour period. Noise associated with parking lot vehicle movements is expected to operate for the entire hour (60 minutes) (Urban Crossroads p. 42, Appendix M).

Project Operational Noise Levels

Using the reference noise levels described above to represent the proposed warehouse operations, Urban Crossroads calculated the operational source noise levels that are expected to be generated at the Project site and off-site improvement area (combined operational noise levels for unloading/docking activities, roof-top air conditioning, and parking lot vehicular movements) and the Project-related noise level increases that would be experienced at each of the sensitive receiver locations (see **Figure 13 – Operational Noise Source Locations**). Based on Urban

Crossroads Noise Impact Analysis, the loudest combined operational noise levels would be at receiver location R1, located east of the Project site across Indian Avenue, measuring at 46.3 dBA L_{eq} (see **Figure 13**). The measured noise level is well below the City's Municipal Code exterior noise level standards of 80 dBA L_{eq} during the daytime and 60 dBA L_{eq} during the nighttime. As such, the Project operational noise levels will satisfy the City's Municipal Code exterior noise level standards; impacts are considered to be less than significant (Urban Crossroads p. 45, Appendix M).

To describe the Project operational noise level contributions, the Project operational noise levels are combined with the existing ambient noise levels measurements for the nearby receiver locations potentially impacted by Project operational noise sources. Based on the Noise Impact Analysis by Urban Crossroads and as shown on **Table 5.12-B – Project Daytime Noise Level Contributions and Table 5.12-C – Project Nighttime Noise Level Contributions**, the Project will contribute a daytime operational noise level increase of up to 0.1 dBA L_{eq} and a nighttime operational noise level increase of up to 0.1 dBA L_{eq} at the sensitive receiver locations, respectively. Since the Project-related operational noise level contributions would not exceed the significance criteria of 5 dBA L_{eq} when the without Project noise levels are below 60 dBA CNEL or 3 dBA L_{eq} when the without Project noise levels already exceed 60 dBA CNEL, Urban Crossroads concluded that the increases at the sensitive receiver locations are considered less than significant and no mitigation is required (Urban Crossroads pp. 46-47, Appendix M).

Table 5.12-B – Project Daytime Noise Level Contributions

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Threshold[7]	Threshold Exceeded?
R1	46.3	L3	64.6	64.7	0.1	3.0	No
R2	37.2	L2	60.7	60.7	0.0	3.0	No
R3	30.9	L4	65.5	65.5	0.0	3.0	No
R4	24.1	L5	64.4	64.4	0.0	3.0	No
R5	23.7	L5	64.4	64.4	0.0	3.0	No

Source: Urban Crossroads 2019, Table 9-3 (Appendix M).

Notes:

[1] See Exhibit 9-A in Appendix M for the sensitive receiver locations.

[2] Total Project operational noise levels are described in Table 9-2 of Appendix M.

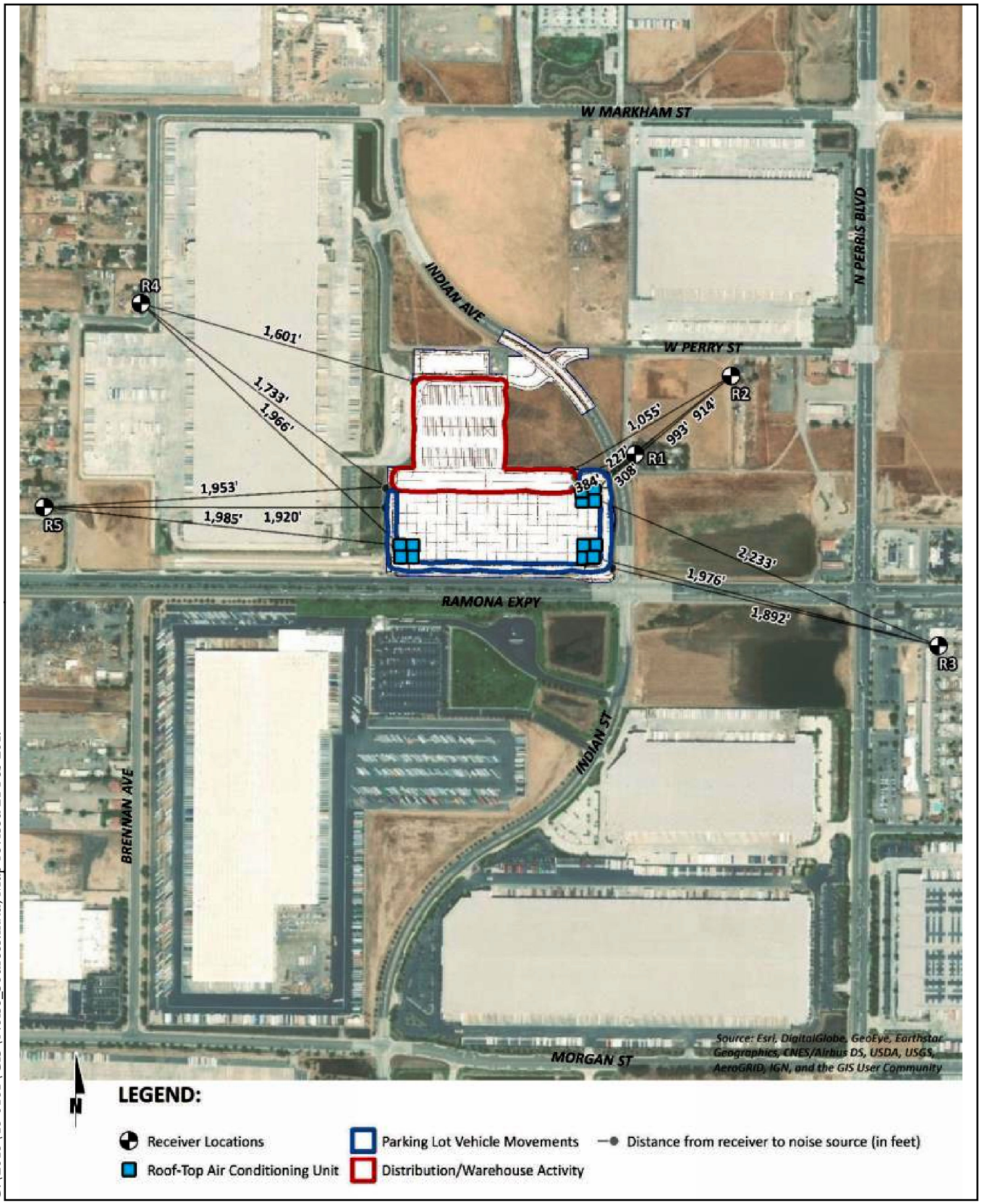
[3] Reference noise level measurement locations are shown on Exhibit 5-A of Appendix M.

[4] Observed daytime ambient noise levels as shown on Table 5-1 of Appendix M.

[5] Represents the combined ambient conditions plus the Project activities.

[6] The noise level increase expected with the addition of the proposed Project activities.

[7] A 3 dBA increase threshold is used when the existing ambient noise levels already exceed 60 dBA.



G:\2018\18-0181\GIS\Noise_Sources.mxd; Map revised 21 Feb 2019

Source: Fig. 9-A, Noise Impact Analysis, Urban Crossroads, 2019.

Figure 13 – Operational Noise Source Locations

IDI Indian Avenue and Ramona Expressway Warehouse Project

Not to Scale

ALBERT A. WEBB ASSOCIATES

Table 5.12-C – Project Nighttime Noise Level Contributions

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Threshold[7]	Threshold Exceeded?
R1	46.3	L3	61.5	61.6	0.1	3.0	No
R2	37.2	L2	53.9	54.0	0.1	5.0	No
R3	30.9	L4	62.9	62.9	0.0	3.0	No
R4	24.1	L5	55.6	55.6	0.0	5.0	No
R5	23.7	L5	55.6	55.6	0.0	5.0	No

Source: Urban Crossroads 2019, Table 9-4 (Appendix M).

Notes:

[1] See Exhibit 9-A in Appendix M for the sensitive receiver locations.

[2] Total Project operational noise levels are described in Table 9-2 of Appendix M.

[3] Reference noise level measurement locations are shown on Exhibit 5-A of Appendix M.

[4] Observed nighttime ambient noise levels as shown on Table 5-1 of Appendix M.

[5] Represents the combined ambient conditions plus the Project activities.

[6] The noise level increase expected with the addition of the proposed Project activities.

[7] A 3 dBA increase threshold is used when the existing ambient noise levels already exceed 60 dBA and a 5 dBA increase threshold is used when the existing ambient noise levels are below 60 dBA .

Off-Site Traffic Noise Analysis

In addition to the noise generated by the building operations itself, the Project will also generate noise from trucks using local roads to access the site. To quantify the off-site traffic noise increases on the surrounding off-site areas, the changes in traffic noise levels on six roadway segments surrounding the Project site and off-site improvement area were calculated by Urban Crossroads based on the change in the average daily traffic volumes. The traffic noise levels provided in this analysis are based on the traffic forecasts in the TIA prepared by Urban Crossroads (Appendix N). To assess the off-site noise level impacts associated with the proposed Project, noise contour boundaries were developed by Urban Crossroads for Existing Without/With Project, Existing plus Ambient Without/With Project, and Existing plus Ambient plus Cumulative Without/With Project traffic conditions.

Based on the Noise Impact Analysis by Urban Crossroads and as shown on **Table 5.12-D – Existing Condition Off-Site Project-Related Traffic Noise Impacts**, the Existing without Project exterior noise levels are expected to range from 72.6 to 78.9 dBA CNEL and the Existing with Project conditions are expected to range from 72.6 to 79.0 dBA CNEL. The exterior noise level increase from the Existing Without Project and Existing With Project results in up to 0.8 dBA CNEL which is below the significance threshold of 3 dBA CNEL when the without Project noise levels already exceeds the 60 dBA CNEL at noise-sensitive uses, and is below the 5 dBA CNEL increase threshold for non-noise-sensitive uses (Urban Crossroads pp. 34-35, Appendix M).

Table 5.12-D – Existing Condition Off-Site Project-Related Traffic Noise Impacts

ID	Road	Segment	CNEL at Adjacent Land Use (dBA)[1]			Noise-Sensitive Land Use?[2]	Threshold Exceeded?[3]
			No Project	With Project	Project Addition		
1	Indian Avenue	North of Driveway 2	73.0	73.8	0.8	No	No
2	Indian Avenue	North of Perry Street	73.0	73.0	0.0	No	No
3	Indian Avenue	South of Perry Street	72.6	72.6	0.0	Yes	No
4	Indian Avenue	North of Ramona Expressway	72.6	72.6	0.0	No	No
5	Ramona Expressway	West of Driveway 1	78.9	79.0	0.1	No	No
6	Ramona Expressway	East of Indian Avenue	78.5	78.5	0.0	No	No

Source: Urban Crossroads 2019, Table 7-7 (Appendix M).

Notes:

[1] The CNEL is calculated at the boundary of the right-of-way of each roadway and the nearest adjacent land use.

[2] "Yes" = Existing, noise-sensitive land uses adjacent to the study area road segment.

[3] A 3 dBA increase threshold is used when the existing ambient noise levels already exceed 60 dBA and a 5 dBA increase threshold is used for non-noise sensitive uses.

Based on the Noise Impact Analysis by Urban Crossroads and as shown on **Table 5.12-E – Existing plus Ambient Off-Site Project-Related Traffic Noise Impacts**, the Existing plus Ambient without Project exterior noise levels are expected to range from 72.9 to 79.2 dBA CNEL and the Existing plus Ambient with Project conditions are expected to range from 72.9 to 79.2 dBA CNEL. The exterior noise level increase from the Existing plus Ambient Without Project and Existing plus Ambient With Project results in up to 0.8 dBA CNEL which is below the significance threshold of 3 dBA CNEL when the without Project noise levels already exceeds the 60 dBA CNEL at noise-sensitive uses, and is below the 5 DBA CNEL increase threshold for non-noise-sensitive uses (Urban Crossroads pp. 35-36, Appendix M).

Table 5.12-E – Existing plus Ambient Off-Site Project-Related Traffic Noise Impacts

ID	Road	Segment	CNEL at Adjacent Land Use (dBA)[1]			Noise-Sensitive Land Use?[2]	Threshold Exceeded?[3]
			No Project	With Project	Project Addition		
1	Indian Avenue	North of Driveway 2	73.2	74.0	0.8	No	No
2	Indian Avenue	North of Perry Street	73.2	73.2	0.0	No	No
3	Indian Avenue	South of Perry Street	72.9	72.9	0.0	Yes	No
4	Indian Avenue	North of Ramona Expressway	72.9	72.9	0.0	No	No
5	Ramona Expressway	West of Driveway 1	79.2	79.2	0.0	No	No
6	Ramona Expressway	East of Indian Avenue	78.8	78.8	0.0	No	No

Source: Urban Crossroads 2019, Table 7-8 (Appendix M).

Notes:

[1] The CNEL is calculated at the boundary of the right-of-way of each roadway and the nearest adjacent land use.

[2] "Yes" = Existing, noise-sensitive land uses adjacent to the study area road segment.

[3] A 3 dBA increase threshold is used when the existing ambient noise levels already exceed 60 dBA and a 5 dBA increase threshold is used for non-noise sensitive uses.

Based on the Noise Impact Analysis by Urban Crossroads and as shown on **Table 5.12-F – Existing plus Ambient plus Cumulative Project-Related Traffic Noise Impacts**, the Existing plus Ambient plus Cumulative without Project exterior noise levels are expected to range from 73.5 to 79.9 dBA CNEL and the Existing plus Ambient plus Cumuative with Project conditions are expected to range from 73.5 to 79.9 dBA CNEL. The exterior noise level increase from the Existing plus Ambient plus Cumulative Without Project and Existing plus Ambient plus Cumulative With Project results in up to 0.7 dBA CNEL which is below the significance threshold of 3 dBA CNEL when the without Project noise levels already exceeds the 60 dBA CNEL at noise-sensitive uses, and is below the 5 dBA CNEL increase threshold for non-noise-sensitive uses (Urban Crossroads p. 36, Appendix M).

Table 5.12-F – Existing plus Ambient plus Cumulative Project-Related Traffic Noise Impacts

ID	Road	Segment	CNEL at Adjacent Land Use (dBA)[1]			Noise-Sensitive Land Use?[2]	Threshold Exceeded?[3]
			No Project	With Project	Project Addition		
1	Indian Avenue	North of Driveway 2	73.8	74.5	0.7	No	No
2	Indian Avenue	North of Perry Street	73.8	73.8	0.0	No	No
3	Indian Avenue	South of Perry Street	73.5	73.5	0.0	Yes	No
4	Indian Avenue	North of Ramona Expressway	73.5	73.5	0.0	No	No
5	Ramona Expressway	West of Driveway 1	79.9	79.9	0.0	No	No
6	Ramona Expressway	East of Indian Avenue	79.4	79.4	0.0	No	No

Source: Urban Crossroads 2019, Table 7-9 (Appendix M).

Notes:

[1] The CNEL is calculated at the boundary of the right-of-way of each roadway and the nearest adjacent land use.

[2] "Yes" = Existing, noise-sensitive land uses adjacent to the study area road segment.

[3] A 3 dBA increase threshold is used when the existing ambient noise levels already exceed 60 dBA and a 5 dBA increase threshold is used for non-noise sensitive uses.

Based on the analysis in the Noise Impact Analysis by Urban Crossroads and **Tables 5.12-A through 5.12-F** as summarized above, the Project-related construction noise, operational noise, and traffic-related noise level will not exceed City standards and will be under the applicable 3 dBA or 5 dBA increase thresholds. Therefore impacts from the project's noise sources will not exceed city noise standards and are considered less than significant and no mitigation is required.

12b. **Less than significant impact.** Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. It is expected that ground-borne vibration from Project construction activities would cause only intermittent, localized intrusion. The proposed Project's construction activities most likely to cause vibration impacts include:

- Heavy Construction Equipment: Although all heavy mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage.

- Trucks: Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on

streets with bumps or potholes. Repairing the bumps and potholes generally eliminates the problem.

Ground-borne vibration levels resulting from construction activities occurring within the Project site and off-site improvement area were estimated by data published by the Federal Transit Administration (FTA). Construction activities that would have the potential to generate low levels of ground-borne vibration within the Project site and off-site improvement area include grading. Using the vibration source level of construction equipment provided on **Table 5.12-G** and the construction vibration assessment methodology published by the FTA, it is possible to estimate the Project vibration impacts.

Table 5.12-G – Vibration Source Levels for Construction Equipment

Equipment	Vibration Decibels (VdB) at 25 feet[1]
Small bulldozer	58
Jackhammer	79
Loaded Trucks	86
Large bulldozer	87

Source: FTA, Transit Noise and Vibration Impact Assessment, May 2006.

Table 5.12-H presents the expected Project related vibration levels at the nearby receiver locations. Pursuant to FTA standards, a significant impact could occur if sensitive receptors were to be exposed to ground-borne vibration levels of 80 vibration decibels (VdB) or more.

Table 5.12-H – Unmitigated Construction Equipment Vibration Levels

Receiver Location[1]	Distance to Construction Activity (Feet)	Receiver Vibration Levels (VdB)[2]					Threshold Exceeded?[3]
		Small Bulldozer	Jackhammer	Loaded Trucks	Large Bulldozer	Highest Vibration Levels	
R1	187'	31.8	52.8	59.8	60.8	60.8	No
R2	770’	13.3	34.3	41.3	42.3	42.3	No
R3	1,853'	1.9	22.9	29.9	30.9	30.9	No
R4	1,581'	4.0	25.0	32.0	33.0	33.0	No
R5	1,946'	1.3	22.3	29.3	30.3	30.3	No

Source: Urban Crossroads 2019, Table 10-9 (Appendix M).

Notes:

[1] Noise receiver locations are shown on Exhibit 10-A of Appendix M.

[2] Based on the Vibration Source Levels of Construction Equipment included on Table 6-8 of Appendix M.

[3] Does the peak vibration exceed the FTA maximum acceptable vibration standard of 80 VdB?

Based on the reference vibration levels provided by the FTA, a large bulldozer represents the peak source of vibration with a reference level of 87 VdB at 25 feet. At distances ranging from 187 to 1,946 feet from the Project construction activities, construction vibration levels are expected to range from 30.3 to 60.8 VdB, as shown on **Table 5.12-B**. Using the construction vibration assessment methods provided by the FTA, Project construction vibration levels will remain below the FTA 80 VdB threshold at all sensitive receiver locations, and therefore, is considered a less than significant impact.

Further, vibration levels at the site of the closest sensitive receiver are unlikely to be sustained during the entire construction period, but will occur rather only during the times that heavy construction equipment is operating at the Project site/off-site improvement area perimeter. Although Project construction noise and vibration impacts will be less than significant, the Project is required to incorporate PVCCSP EIR mitigation measures **MM Noise 1 through MM Noise 4**.

Although the human threshold of perception for vibration is around 65 VdB, human response to vibration is not usually significant unless the vibration exceeds 70 VdB. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement condition. Typical vibration levels for heavy trucks at normal traffic speeds do not exceed 65 VdB, and therefore, will be below the FTA vibration threshold of 80 VdB at nearby sensitive receiver locations. Truck deliveries transiting on site will be traveling at very low speeds, so it is expected that delivery truck vibration impacts at nearby homes will not exceed the 80 VdB vibration threshold (Urban Crossroads p. 47, Appendix M).

PVCCSP Mitigation Measures

Refer to **MM Noise 1 through MM Noise 4** under Threshold 12a.

12c. **Less than significant impact.** The Project's permanent noise impacts will result from operational and off site traffic noise. Refer to *Threshold 12a* above.

Project Operational Noise Levels

To describe the Project operational noise level contributions, the Project operational noise levels are combined with the existing ambient noise levels measurements for the nearby receiver locations potentially impacted by Project operational noise sources. Based on the Noise Impact Analysis by Urban Crossroads and as shown on **Table 5.12-B and Table 5.12-C**, the Project will contribute a daytime operational noise level increase of up to 0.1 dBA L_{eq} and a nighttime operational noise level increase of up to 0.1 dBA L_{eq} at the sensitive receiver locations, respectively. Since the Project-related operational noise level contributions would not exceed the significance criteria of 5 dBA L_{eq} when the without Project noise levels are below 60 dBA CNEL or 3 dBA L_{eq} when the without Project noise levels already exceed 60 dBA CNEL, Urban Crossroads concluded that the increases at the sensitive receiver locations are considered less than significant and no mitigation is required (Urban Crossroads pp. 46-47, Appendix M). Therefore the Project will not result in a significant permanent increase in noise levels from building operation.

Off-Site Traffic Noise Analysis

Based on the analysis in the Noise Impact Analysis as summarized above under *Threshold 12a*, the Project-related traffic noise level increases will not increase above 3 dBA CNEL increase threshold when the without Project noise levels already exceed 60 dBA CNEL at noise-sensitive uses or 5 dBA CNEL increase threshold for non-sensitive receptors for offsite traffic noise. Therefore the Project will not result in a significant permanent increase in noise levels from offsite traffic noise.

12d. **Less than significant impact with mitigation.** As discussed in *Threshold 12a* and *Threshold 12b* above, construction will have a temporary and periodic increase in the ambient noise levels above existing within the Project vicinity. However, as outlined above, the construction noise levels will not exceed any City GP 2030 standards or thresholds within the Municipal Code. Implementation of PVCCSP EIR mitigation measures **MM Noise 1 through MM Noise 4** will further reduce any potential impacts in regards to construction-related noise. Therefore, the proposed Project will not cause a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project. Thus, impacts are considered to be less than significant with mitigation incorporated.

PVCCSP Mitigation Measures

Refer to **MM Noise 1 through MM Noise 4** under Threshold 12a.

12e. **Less than significant impact with mitigation.** The Riverside County Airport Land Use Commission has adopted the Riverside County ALUCP to establish land use restrictions within the Airport Influence Areas that were adopted by the Airport Land Use Commission around airports in Riverside County (Perris 2011, pp. 4.9-15). The MARB/Inland Port Airport is located approximately 1.2 miles northwest of the Project site and off-site improvement area. As identified in the PVCCSP EIR (Figure 4.9-7, March Air Reserve Base Flight Tracks), the Project site is located beneath the identified flight tracks for airplanes using the MARB/Inland Port airfield. As such, there is the potential for single-event noise exposure levels to affect the proposed Project. The exposure levels will vary depending on the type of aircraft and flight track flown for each operation at MARB/Inland Port Airport. The Project site and off-site improvement area is located within MARB/Inland Port Airport Compatibility Zone B1 and APZ I and APZ II areas. Specifically, the proposed parking area on the northern portion of the Project site and the off-site improvement area is within APZ I and the proposed warehouse building is within APZ II.

The Project site and off-site improvement area is located within an area that is exposed to elevated levels of noise from aircraft operations at MARB. The Project site and off-site improvement area falls within MARB/Inland Port Airport's projected 70 to 75 dBA CNEL noise contours, as shown on **Figure 14 – MARB/IPA Airport Noise Contours**. The PVCCSP EIR identifies compatibility criteria for land uses within the Specific Plan related to the MARB/Inland Port Airport noise level contour boundaries. When aircraft-related exterior noise levels approach 75 dBA CNEL, light industrial uses such as the proposed Project are considered conditionally acceptable. Further, the PVCCSP requires that building office areas shall be constructed with appropriate sound mitigation measures as determined by an acoustical engineer or architect to insure appropriate interior sound levels. Since detailed building plans (e.g., wall, ceiling, and floor assemblies) are not available at the time of this analysis, in order to comply with the PVCCSP noise standard for

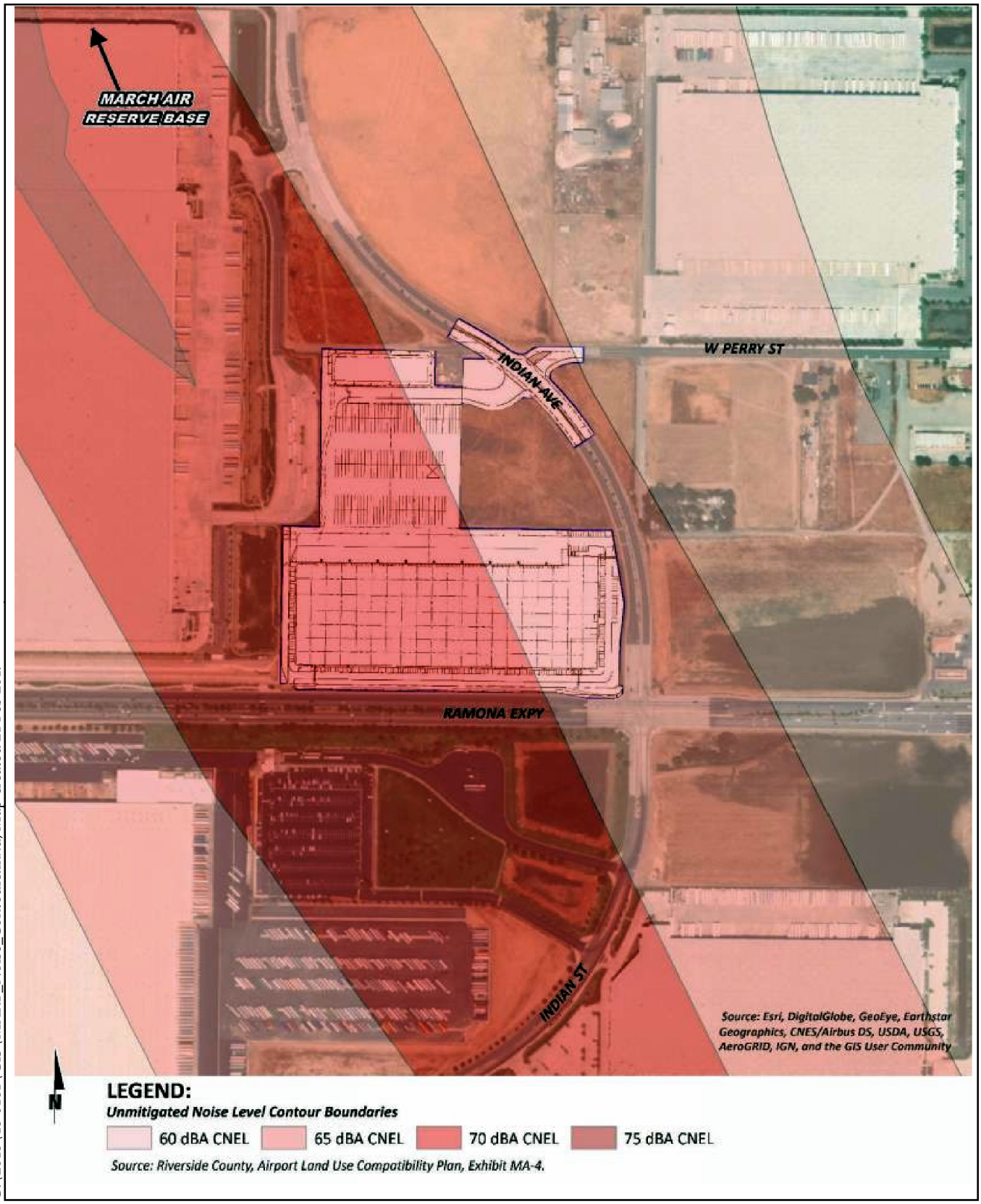
building office areas, an additional noise study (**MM Noise 1**) shall be required to demonstrate compliance with the most current State of California's Green Building Standards Code requirements for non-residential land uses.

Project Mitigation Measures

> **MM Noise 1:** Prior to approval of a building permit for the proposed Project building, a noise study shall be required which demonstrates compliance with the latest State of California's Green Building Standards Code requirements for non-residential land uses, based on detailed building plans for the interior office areas. The noise study shall identify additional building materials, if necessary, to satisfy the State of California's Green Building Standards Code.

Since the Project includes land uses which are compatible with the MARB noise contours, and since **MM Noise 1** (consistent with the PVCCSP noise standard) requires the offices to be designed such that building materials attenuate airplane noise, impacts are considered less than significant with mitigation.

12f. **No impact.** The Perris Valley Airport and Skydiving Center is a privately owned and operated airport within the City; however, it is located approximately 5 miles south of the proposed Project site and off-site improvement area. Therefore, because the proposed Project is not located in the immediate vicinity of a private air strip or its influence area, no noise impacts are anticipated and no mitigation is required.



G:\2018\18-0181\GIS\MARB_Noise_Contours.mxd; Map created 21 Feb 2019

Source: Fig. 3-A, Noise Impact Analysis, Urban Crossroads, 2019.

Figure 14 – MARB/IPA Airport Noise Contours

IDI Indian Avenue and Ramona Expressway Warehouse Project

Not to Scale

ALBERT A. WEBB ASSOCIATES

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

References: U.S. Census Bureau 2018 and SCAG 2015.

Applicable PVCCSP Standards and Guidelines

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

Explanation of Checklist Answers

13a. **Less than significant impact.** According to the U.S. Census Bureau, the City's population as of July 2017 is 77,879 (U.S. Census Bureau 2018). The SCAG estimates, the population of Perris is expected to increase to about 116,700 by the year 2040 (SCAG 2015, p. 27) although that is far above current City development conditions. The proposed Project does not involve construction of any new homes and will not contribute to a direct increase in the City's population. The proposed Project may indirectly contribute to population growth within the City by creating jobs both during construction and operation. However, it is anticipated that the majority of new jobs would be filled by workers who already reside in the Project vicinity and that the Project would not attract a significant amount of new residents to the City.

Although the proposed Project will include some expansion of infrastructure, this new infrastructure will all be constructed to serve the proposed Project's needs and will not cause additional growth (see **Figure 8**). The creation of jobs and necessary infrastructure to support the land uses proposed in the PVCCSP were already addressed and analyzed in the previous PVCCSP EIR (Perris 2011, p. 4.11-1). Therefore, construction and operation of the proposed Project will have a less than significant impact on population growth within the City and Project vicinity and no mitigation is required.

13b. **No impact.** The Project site and off-site improvement area is currently vacant and undeveloped. There are no existing homes at the Project site, off-site improvement area, or in the immediate vicinity. Therefore, the Project will not displace any existing housing and will not necessitate construction of replacement housing elsewhere. No impacts are anticipated and no mitigation is required.

13c. **No impact.** The Project site and off-site improvement area is currently vacant and undeveloped. There are no existing homes at the Project site, off-site improvement area, or in the immediate vicinity. Therefore, neither construction nor operation of the

proposed Project will displace substantial numbers of people. No impacts are anticipated and no mitigation is required.

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

References: Perris 2005b, Perris 2009, Perris 2012, and Perris 2018.

Applicable PVCCSP Standards and Guidelines

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

Crime Prevention Measures (Section 4.2.1)

Development projects should take precautions by installing on-site security measures. Security and safety of future users of facilities constructed within the Perris Valley Commerce Center Specific Plan should be considered in the design concepts for each individual development proposal such as:

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

Off-Site Infrastructure Standards (Section 5.4)

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

Explanation of Checklist Answers

14a. **Less than significant impact.** The North Perris Fire Station #90 is located at 333 Placentia Avenue Perris, California, approximately 1.7 miles southeast of the proposed Project site and off-site improvement area. It is expected that this fire station would provide first response to the proposed Project; however, Fire Station #1 (210 W. San Jacinto Avenue Perris, California 92570) is located approximately four miles south of the proposed Project site/off-site improvement area and could also serve the Project site/off-site improvement area, if needed. City Ordinance No. 1182 establishes a developer impact fee to mitigate the cost of public facilities needed to offset the impact of developing new facilities to support fire services (Perris 2009, p. 16). The proposed Project will be required to comply with Ordinance No. 1182 in order to offset potential impacts to the local fire department; therefore, impacts will be less than significant and no mitigation is required.

14b. **Less than significant impact.** The City contracts with the Riverside County Sheriff to provide police services for the City. The Perris police station is located at 137 North Perris Boulevard, approximately five miles south of the Project site and off-site improvement area. As stated in *Threshold 14a,* Ordinance No. 1182 establishes a developer impact fee to mitigate the cost of public facilities to serve new development. The Sheriff Department receives a portion of these developer impact fees, which are collected and distributed in order to offset the impact of developing new facilities to support sheriff services (Perris 2009, p. 17). The proposed Project will be required to comply with Ordinance No. 1182 in order to offset potential impacts to the local fire department; therefore, impacts will be less than significant and no mitigation is required.

14c. **Less than significant impact.** The proposed Project is located within the boundaries of the Val Verde Unified School District. The proposed Project will not directly create a source of school-aged children, as the Project does not increase residential land use designations. It may indirectly affect schools by providing a source of employment that may draw new residents into the area; however, appropriate DIFs, as required by state law, shall be assessed and paid to the school district (Perris 2009, p. 17). Therefore, with the payment of these fees, impacts are considered to be less than significant and no mitigation is required.

14d. **Less than significant impact.** The proposed Project will not directly require the construction or expansion of public recreational facilities as it does not propose new residential uses. However, it may indirectly affect public recreational facilities by providing a source of employment that may draw new residents into the area. The applicable Recreational Facilities DIFs shall be assessed and paid towards parks. With the payment of these fees, the impacts to parks and other public recreational facilities are considered mitigated to a less than significant level. There will be some recreational amenities that are provided in accordance with the PVCCSP Industrial Development Standards and Guidelines for recreational amenities as part of the Project to serve the future employees. The physical impacts of building these amenities are addressed through the overall analysis of the site development and no unique or separate environmental impacts will occur as a result of building these facilities. Based on the above discussion, impacts are considered to be less than significant and no mitigation is required.

14e. **Less than significant impact.** The proposed Project would not directly increase the demand for other public services such as libraries because it does not propose new

residential uses. The City contracts with the Riverside County Public Library System and provides library services at Cesar E. Chavez Library located at 163 E. San Jacinto Boulevard, approximately four miles south of the proposed Project site and off-site improvement area. The proposed Project is subject to DIFs that are used to construct new library facilities or expand existing library facilities subsequent to increased demand (Perris 2009, p. 17). Through payment of applicable fees, potential impacts to library services resulting from the proposed Project are less than significant and no mitigation is required.

Another public service that could be affected by the implementation of the Project are emergency medical services. The nearest emergency medical service available to the proposed Project area is the Riverside County Regional Medical Facility in Moreno Valley (26520 Cactus Avenue Moreno Valley, California 92555), approximately five miles northeast of the Project site and off-site improvement area. Healthcare facilities are developed in response to perceived market demand by free enterprise (Perris 2005b, p. IV-93). Therefore, the development of the proposed Project will not result in the need to construct for new or expanded medical facilities. The PVCCSP Initial Study determined that any substantial adverse physical impacts associated with the provisions of new or physically altered medical facilities associated with development within the PVCC is considered to be less than significant (Perris 2009, p. 17). Therefore, impacts are considered less than significant and no mitigation is required.

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

References: Perris 2012 and Perris 2018.

Applicable PVCCSP Standards and Guidelines

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

Industrial Development Standards and Guidelines, Employee Break Areas and Amenities (Section 8.2, Subsection 8.2.1.4).

- An outdoor break area should be provided at each office area location.
- Buildings exceeding 100,000 square feet shall require employee amenities such as, but not limited to, cafeterias, exercise rooms, locker rooms and shower, walking trails, and recreational facilities.

- Site design should consider pedestrian access when adjacent to area wide open space, trails, parks, or other community amenities.

Explanation of Checklist Answers

15a. **Less than significant impact.** The Project is proposed to operate as a warehouse and will not create a direct increase in the use of recreational facilities. Although the proposed Project may indirectly affect recreational facilities by creating new jobs in the area which may draw new residents to the area, it is anticipated that the majority of jobs will be filled by individuals already residing in the Project vicinity. Indirect impacts to park facilities will be offset through payment of the applicable Recreational Facilities DIFs. With payment of these fees, impacts to parks and other public recreational facilities will be less than significant and no mitigation is required.

15b. **Less than significant impact.** See response to *Threshold 15a* above. There will be some recreational amenities that are provided as part of the Project to serve the future employees. Outdoor break area(s) will be provided by the proposed office(s). Since the proposed warehouse building exceeds 100,000 square feet, amenities such as a basketball half-court or other PVCCSP Industrial Development Standards and Guidelines will be included to the satisfaction of City staff (City of Perris 2012 and 2018, p. Section 8-0.2). The physical impacts of building these amenities are addressed through the overall analysis of the site development and no unique or separate environmental impacts will occur as a result of building these facilities. Incremental impacts to public park facilities will be offset via payment of applicable Recreational Facilities DIFs; therefore, impacts will be less than significant and no mitigation is required.

5.16. TRANSPORTATION/TRAFFIC	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☒	☐	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐

5.16. TRANSPORTATION/TRAFFIC	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☒	☐	☐

References: Perris 2011, Perris 2012, RTA, and Urban Crossroads 2019 (Appendix N).

Applicable PVCCSP Standards and Guidelines

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

Pedestrian Access and On-Site Circulation (Section 4.2.2.3)

- Avoid Conflicts Between Pedestrian and Vehicular Circulation. Provide a system of pedestrian walkways that avoids conflicts with vehicle circulation through the utilization of separated pathways for direct pedestrian access from public rights-of-way and parking areas to building entries and throughout the site with internal pedestrian linkages.

- Primary Walkway. Primary walkways should be 5 feet wide at a minimum and conform to ADA/ Title 24 standards for surfacing, slope, and other requirements.

- Pedestrian Linkages to Public Realm. A minimum five-foot wide sidewalk or pathway, at or near the primary drive aisle, should be provided as a connecting pedestrian link from the public street to the building(s), as well as to systems of mass transit, and other on-site building(s).

The PVCCSP EIR mitigation measures related to transportation and traffic that are applicable to the proposed Project are incorporated in the following analysis.

Explanation of Checklist Answers

16a. **Less than significant impact with mitigation.** A TIA was prepared for the Project by Urban Crossroads (Appendix N) to evaluate the proposed Project's impacts on traffic. The traffic generation figures used in the TIA were based upon the development of approximately 428,730 square feet of high-cube warehouse (with no cold storage) and an ITE trip generation of "high cube warehouse" land use code 154. Use of this land use code is appropriate due to the APZ restrictions, which limit occupancy of the Project. Given that, the proposed Project is projected to generate a net total of 897 passenger car-equivalent (PCE) trip-ends per day on a typical weekday with approximately 50 net AM PCE peak hour trips and 58 net PM PCE peak hour trips (Urban Crossroads p. 1 and p. 45, Appendix N). The Project's traffic dissipates between the Project site and the State facilities (intersections or freeway segments). Based on the Project's trip distribution that was analyzed in the TIA, the Project only contributes 13 AM PCE peak hour trips and 24 PM PCE peak hour trips to the I-215 freeway and Ramona Expressway freeway ramps. Since the Project

does not contribute 50 or more peak hour trips to any State facilities, assessment of State facilities is not required as the Project's traffic contribution to the State facilities is considered to be less than significant (Urban Crossroads p. 4, Appendix N).

The TIA evaluated intersection level of service (LOS) for Existing (2018) conditions, Existing plus Project (2018) conditions, Existing plus Ambient Growth (2020), Existing plus Ambient Growth plus Project (2020) conditions, Existing Plus Ambient Growth Plus Cumulative Projects (2020) conditions, and Existing Plus Ambient Growth plus Project plus Cumulative Projects (2020) conditions. The TIA study area included the following intersections:

1. Driveway 1 and Ramona Expressway – Future Intersection

2. Indian Avenue and Driveway 2/Perry Street

3. Indian Avenue and Driveway 3 – Future Intersection

4. Indian Avenue and Ramona Expressway

To determine whether the addition of Project-generated trips results in a significant impact, and thus requires mitigation, the TIA evaluated significant impacts based on the following criteria:

- A project-related impact is considered direct and significant when a study intersection operates at an acceptable LOS for existing conditions (without the project) and the addition of 50 or more AM or PM peak hour project trips causes the intersection to operate at an unacceptable LOS for Existing plus Project traffic conditions.
- A project-related impact is considered direct and significant when a study intersection operates at an unacceptable LOS for existing conditions (without the project) and the addition of 50 or more AM or PM peak hour project trips causes the intersection delay to increase by 2 seconds or more.
- A cumulative impact is considered significant when a study intersection is forecast to operate at an unacceptable LOS with the addition of cumulative/background traffic and 50 or more AM or PM peak hour project trips.

The acceptable LOS for the City of Perris is LOS "D" along all City maintained roads (including intersections) and LOS "D" along the I-215 freeway and State Route 74 (including intersections with local streets and roads). The TIA demonstrated that the proposed Project will maintain acceptable LOS on the study intersections under the following scenarios:

- Existing (2018) conditions (LOS A or LOS B),

- Existing plus Project (2018) conditions (LOS A, LOS B, or LOS C),

- Existing plus Ambient Growth (2020) (LOS A or LOS B),

- Existing plus Ambient Growth plus Project (2020) conditions (LOS A or LOS C),

- Existing Plus Ambient Growth Plus Cumulative Projects (2020) conditions (LOS B, LOS C, or LOS D), and

- Existing Plus Ambient Growth plus Project plus Cumulative Projects (2020) (LOS A, LOS B, LOS C, or LOS D).

The TIA concluded for all of these scenarios that there are no direct traffic impacts generated by the proposed Project (Urban Crossroads p. 42 [Table 3-1], p. 60 [Table 5-1], p. 66 [Table 6-1], p. 72 [Table 7-1], Appendix N).

To further evaluate if the Project would conflict with measures designed for effectiveness of circulation, a traffic signal warrant analysis was conducted by Urban Crossroads and summarized in the TIA. No traffic signal warrant analysis was performed by Urban Crossroads for Existing (2018) conditions as the only unsignalized intersection is currently restricted to right-in/right-out access only (Urban Crossroads p. 39, Appendix N). No traffic signal warrant analysis was performed by Urban Crossroads for Existing plus Ambient Growth (2020) conditions as the only unsignalized intersection is restricted to right-in/right-out access only. Traffic signal warrants have been performed (based on CA MUTCD) for Existing plus Ambient plus Project (2020) traffic conditions based on peak hour volumes. For Existing plus Ambient plus Project (2020) conditions, Urban Crossroads determined no traffic signals are warranted (Urban Crossroads p. 57 and p. 61, Appendix N). Although Driveway 2 is not anticipated to warrant a traffic signal based on future projected daily traffic, the Project applicant is proposing the installation of a traffic signal as it is proposed to accommodate access to trucks heading to and from the north (Harley Knox Boulevard via Indian Avenue) (Urban Crossroads p. 12, Appendix N).

The proposed Project would include roadway improvements to Ramona Expressway, Indian Avenue, and Perry Street. Ramona Expressway is an east-west oriented roadway located along the Project's southern boundary. The Project applicant will construct Ramona Expressway to its ultimate half-section width as an Expressway (184-foot right-of-way) between the western Project boundary and Indian Avenue consistent with the PVCCSP and the City's General Plan Circulation Element (Project-specific **MM Transportation 1**). Indian Avenue is a north-south oriented roadway located along the Project's eastern boundary. The Project applicant will construct Indian Avenue to its ultimate half-section width as a Secondary Arterial (94-foot right-of-way) between the eastern Project boundary (at the proposed Driveway 3) and Ramona Expressway consistent with the PVCCSP and City's General Plan Circulation Element (Project-specific **MM Transportation 2**). The Project applicant proposes to align Driveway 2 with the existing Perry Street in order to create a 4-leg, full access intersection for trucks (Project-specific **MM Transportation 3**). Additionally, the Project applicant will implement its own Project-specific mitigation measure, **MM Transportation 4**, to ensure trucks are restricted to access the Harley Knox interchange as the sole truck route. Therefore, impacts related to conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system are less than significant with mitigation incorporated.

As required for any projects in the PVCCSP, the proposed Project will also be required to incorporate mitigation measures **MM Trans 1 through MM Trans 5, MM Trans 7, and MM Trans 8** to ensure impacts related to traffic remain at a level below significance.

PVCCSP EIR Mitigation Measures

PVCCSP MM Trans 1: Future implementing development projects shall construct on-site roadway improvements pursuant to the general alignments and right-of-way sections set forth in the PVCC Circulation Plan, except where said improvements have previously been constructed.

PVCCSP MM Trans 2: Sight distance at the project entrance roadway of each implementing development project shall be reviewed with respect to standard City of Perris sight distance standards at the time of preparation of final grading, landscape and street improvement plans.

PVCCSP MM Trans 3: Each implementing development project shall participate in the phased construction of off-site traffic signals through payment of that project's fair share of traffic signal mitigation fees which includes the NPRBBD (North Perris Road and Bridge Benefit District). The fees shall be collected and utilized as needed by the City of Perris to construct the improvements necessary to maintain the required level of service and build or improve roads to their build-out level.

PVCCSP MM Trans 4: Prior to the approval of individual implementing development projects, the Riverside Transit Agency (RTA) shall be contacted to determine if the RTA has plans for the future provision of bus routing in the project area that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that will serve the project area, road improvements adjacent to the project site shall be designed to accommodate future bus turnouts at locations established through consultation with the RTA. RTA shall be responsible for the construction and maintenance of the bus stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalk and curb and gutter at bus stops and the use of ADA-compliant paths to the major building entrances in the project.

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

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

PVCCSP MM Trans 8: Proposed mitigation measures resulting from project-level traffic impact studies shall be coordinated with the North

Perris Road and Bridge Benefit District (NPRBBD) to ensure that they are in conformance with the ultimate improvements planned by the NPRBBD. The applicant shall be eligible to receive proportional credits against the NPRBBD for construction of project level mitigation that is included in the NPRBBD.

Project Mitigation Measures

MM Transportation 1: Prior to final occupancy, the Project applicant shall construct Ramona Expressway to its ultimate half-section width as an Expressway (184-foot right-of-way) between the western Project boundary and Indian Avenue consistent with the PVCCSP and the City's General Plan Circulation Element.

MM Transportation 2: Prior to final occupancy, the Project applicant shall construct Indian Avenue to its ultimate half-section width as a Secondary Arterial (94-foot right-of-way) between the eastern Project boundary (at the proposed Driveway 3) and Ramona Expressway consistent with the PVCCSP and City's General Plan Circulation Element.

MM Transportation 3: Prior to final occupancy, the Project applicant shall align the proposed Driveway 2 with the existing Perry Street in order to create a 4-leg, full access intersection for trucks.

MM Transportation 4: Project truck traffic shall be restricted to take Harley Knox Boulevard as the one and only truck route. Signage shall be posted on-site directing direct truck drivers to use existing City truck route on Harley Knox Boulevard. The information on the signage will be coordinated with City Planning and the City's Traffic Engineer during the plan check process.

16b. **Less than significant impact.** Each county in California is required to develop a Congestion Management Program (CMP) that analyzes at the links between land use, transportation and air quality. The Riverside County Transportation Commission (RCTC) is the County's Congestion Management Agency. RCTC has developed a CMP for the area including the Project site. Pursuant to federal metropolitan transportation planning and programming requirements, the development, establishment and implementation of a CMP is fully integrated into the regional planning process pursuant to 23 CFR, S450.320. Thus, congestion management in the Project vicinity is guided both by the SCAG RTP/SCS and the RCTC CMP.

According to Table 2-1, CMP System of Highways and Roadways, in the 2011 Riverside County CMP, the I-215 freeway is the only road in proximity to the Project site listed as part of the CMP System of Highways and Roadways. Based on the Project's trip generation and trip distribution patterns, the Project is anticipated to contribute fewer than 50 peak hour PCE trips. The total Project trip generation in actual vehicles is less than 50 peak hour trips. Therefore, impacts to the I-215 mainline will be less than significant and no mitigation is required.

16c. **No impact.** Although the proposed Project site and off-site improvement area is within the influence area of the MARB, the Project does not create the need for more air traffic at MARB. The proposed building and anticipated warehouse operations

also would not interfere with existing aircraft flight patterns or operations at MARB. Therefore, no impacts are anticipated and no mitigation is required.

16d. **Less than significant impact with mitigation.** The proposed Project does not include any design features that would increase traffic hazards. The Project is consistent with the on-site and surrounding land use and zoning designations, and implementation of the Project will not introduce incompatible uses to the Project Area. Improvements related to safety contained in PVCCSP EIR mitigation measure **MM Trans 2** and recommendations from the TIA (**MM Transportation 5**) will ensure that adequate sight distance is provided at each Project access location. Additionally, prior to the issuance of final occupancy, City staff will ensure that signing/striping are implemented in conjunction with the detailed construction plans for the Project site and off-site improvement area.

Project truck traffic shall be restricted to take Harley Knox Boulevard as the sole truck route to access the I-215 freeway. Implementation of **MM Transportation 4** shall require signage be posted on-site directing truck drivers to use the existing City truck route on Harley Knox Boulevard. The information on the signage will be coordinated with City Planning and the City's Traffic Engineer during the plan check process. Furthermore, although Driveway 2 on Indian Avenue (truck access only) is not anticipated to warrant a traffic signal based on future projected daily traffic, the Project applicant is proposing the installation of a traffic signal to accommodate access to trucks heading to and from the north (Harley Knox Boulevard via Indian Avenue). Thus, proposed Project will not substantially increase hazards due to a design feature or incompatible uses. Therefore, impacts are less than significant with mitigation incorporated.

PVCCSP EIR Mitigation Measures

Refer to **PVCCSP MM Trans 2** under Threshold 16a.

Project Mitigation Measures

Refer to **MM Transportation 4** under Threshold 16a.

MM Transportation 5: Prior to plan check approval, City Planning staff shall ensure that any landscaping/hardscape within the limited use area should not exceed 30-inches (2.5-feet) in height, including vegetation. The limited use area should be kept clear of any landscaping or any other obstructions that may impede the visibility of the driver, including on-street parking. Minimum horizontal intersection sight distance for the Project driveways is illustrated on Exhibit 1-6 of the Traffic Impact Analysis.

16e. **Less than significant impact.** The proposed Project is required to comply with the City's development review process including review for compliance with the all applicable fire code requirements for construction and access to the Project site and off-site improvement area. The Project will be reviewed by the County Fire Department to determine the specific fire requirements applicable to the Project and to ensure compliance with these requirements. This will ensure that the proposed Project would provide adequate emergency access to and from the site. Further, the City Engineer and the County Fire Department will review any modifications to

existing roadways (i.e., reconfiguration of Perry Street) to ensure that adequate emergency access or emergency response would be maintained in accordance with the County's MHFP. Thus, implementation of the proposed Project will not result in inadequate emergency access. Therefore, impacts are less than significant and no mitigation is required.

16f. **Less than significant impact with mitigation.** The Riverside Transit Agency (RTA) operates several routes in the Project vicinity, including but not limited to Routes 19 and 41 in the Project vicinity (RTA). The PVCCSP also includes pedestrian paths and sidewalks into roadway design, and bike trails into its *Standards and Design Guidelines* to accommodate non-motorized forms of transportation along roadways within the Specific Plan area and to encourage bus stops to be provided at large commercial and employment centers along existing and future bus routes (Perris 2011, p. 4.10-21). Therefore, compliance with these policies will ensure that the Project will not conflict with the City's adopted policies, plans, or programs supporting alternative modes of transportation. Implementation of mitigation measures **MM Trans 4 and MM Trans 5** from the PVCCSP EIR would ensure that potential impacts would be less than significant.

PVCCSP Mitigation Measures

PVCCSP MM Trans 4: Prior to the approval of individual implementing development projects, the Riverside Transit Agency (RTA) shall be contacted to determine if the RTA has plans for the future provision of bus routing in the project area that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that would serve the project area, road improvements adjacent to the project site shall be designed to accommodate future bus turnouts at locations established through consultation with the RTA. RTA shall be responsible for the construction and maintenance of the bus stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalk and curb and gutter at bus stops and the use of ADA-compliant paths to the major building entrances in the project.

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

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

References: BFSA 2018 (Appendix F) and BFSA (Appendix G).

Applicable PVCCSP Standards and Guidelines

There are no PVCCSP Standards and Guidelines or PVCCSP EIR mitigation measures related to the analysis of tribal cultural resources presented in this IS.

Explanation of Checklist Answers:

17a(i). **Less than significant impact.** As discussed in *Threshold 5a* above, there are no listed or eligible for listing in the California Register of Historical Resources, or a local register of historical resources at the Project site or the off-site improvement area. Furthermore, the site and off-site improvement area is currently vacant. Based on the EIC records search and intensive reconnaissance archaeological survey by BFSA on the Project site and off-site improvement area, no impacts to historical resources are anticipated and no mitigation is required.

17a(ii). **Less than significant impact with mitigation.** As of July 1, 2015, AB 52, signed into law in 2014, amends CEQA and establishes new requirements for tribal consultation. The law applies to all projects that have a notice of preparation or notice of negative declaration/mitigated negative declaration. It also broadly defines a new resource category of "tribal cultural resource" and establishes a more robust process for meaningful consultation that includes:

- Prescribed notification and response timelines
- Consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures
- Documentation of all consultation efforts to support CEQA findings

The City, as lead agency, is required to coordinate with Native American tribes through the AB 52 Tribal Consultation process. On July 20, 2018, the City notified six tribes of the proposed Project in accordance with AB 52: the Agua Caliente Band of Cahuilla Indians, Desert Cahuilla Indians (Torres-Martinez), Morongo Band of Mission Indians, Pechanga Band of Luiseño Indians, Rincon Band of Mission Indians, and the Soboba Band of Luiseño Indians. The City provided the Phase I Cultural Resources Survey to these tribes on September 26, 2018.

The Pechanga Band of Luiseño Indians responded on July 26, 2018 requesting to initiate AB 52 consultation with the City. The City emailed the Pechanga Band of Luiseño Indians on August 20, 2018 to request consultation and no responses have been received from the tribe; therefore, AB 52 consultation has been concluded. Rincon Band of Mission Indians responded on August 13, 2018 stating no consultation required. Agua Caliente Band of Cahuilla Indians responded on November 1, 2018 deferring to the Soboba Band of Luiseño Indians and Morongo Band of Mission Indians. To date, no other responses from the tribes (including Soboba Band of Luiseño Indians and Morongo Band of Mission Indians) have been received; therefore, the AB 52 consultation has been concluded.

Implementation of Project mitigation measures **MM Cult 1 and MM Cult 3** as outlined in Section 5.5, Cultural Resources, of this IS will ensure impacts remain less than significant with mitigation incorporated.

Project Mitigation Measures

Refer to **MM Cult 1** under Threshold 5b and **MM Cult 3** under Threshold 5d.

5.18. UTILITIES AND SERVICE SYSTEMS	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

5.18. UTILITIES AND SERVICE SYSTEMS	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

References: EMWD 2014, EMWD 2016, Perris 2009, Perris 2011, Metropolitan Water District (MWD) 2016, CalRecycle 2018a, CalRecycle 2018b,Webb (Appendix K), and EMWD 2018 (Appendix O).

Applicable PVCCSP Standards and Guidelines

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

Explanation of Checklist Answers:

18a. **Less than significant impact.** The EMWD would provide sanitary sewer service to the proposed Project. As explained in the PVCCSP IS, wastewater generated by the proposed Project would be treated at the 300-acre Perris Valley Regional Water Reclamation Facility (PVRWRF) south of Case Road and west of the I-215 freeway (Perris 2009, p. 18). The PVRWRF has typical daily flows of approximately 13.8 million gallons per day (mgd), with a current capacity of approximately 22 mgd and an ultimate capacity of 100 mgd (EMWD 2016).

Waste Discharge Requirements are issued by the SARWQCB under the provisions of the *California Water Code* (Division 7 Water Quality, Article 4 Waste Discharge Requirements). These requirements regulate the discharge of wastes that are not made to surface waters but which may impact the region's water quality by affecting underlying groundwater basins. Operational discharge flows treated at the PVRWRF would be required to comply with waste discharge requirements identified for the facility. The proposed Project would not discharge wastewater into the domestic sewer system in a way that would cause the PVRWRF to exceed requirements, as determined by the SARWQCB's Water Discharge Requirements resulting in a less than significant impact (Perris 2009, p. 18). The EMWD's compliance with conditions, permits, and discharge requirements would further ensure that wastewater treatment requirements would not be exceeded and the Project would result in less than significant impacts to wastewater treatment and no mitigation is required.

18b. **Less than significant impact.** The Project site is within the service boundary for the EMWD. The EMWD provided a Will Serve letter indicating an ability to provide water and sewer service to the Project on September 4, 2018 (Appendix O). The proposed Project will involve installation of an 18-inch diameter waterline in a portion of Indian Avenue between Markham Street and Perry Street and a 12-inch diameter waterline between Perry Street and Ramona Expressway as shown on **Figure 9**. On-site water pipeline improvements include a 10-inch diameter waterline loop around the proposed building. A domestic waterline lateral with meter will also be required between the proposed 12-inch diameter waterline in Indian Avenue and proposed building.

The proposed Project will involve construction of a 12-inch diameter recycled waterline in Indian Avenue from the stub out to the intersection of Ramona Expressway and Indian Avenue. An 8-inch diameter waterline is also proposed at the proposed water quality basin in the northern portion of the Project site, extending northeast connecting to the proposed 12-inch diameter recycled waterline in Indian Avenue (see **Figure 10**).

The proposed Project will involve construction of a sewer line on the southern side and eastern side of the proposed warehouse building and will connect to the existing 16-inch sewer along Ramona Expressway (see **Figure 8**).

All offsite water, recycled, and sewer waterlines will be constructed within existing roadways (Indian Avenue, Perry Street, and Ramona Expressway) or previously disturbed areas, and thus will not result in adverse environmental impacts. Further, adherence to standard EMWD and City conditions relative to the design and installation of new water infrastructure and/or connections to existing water infrastructure would ensure that no significant impacts would result from the construction or operation of the proposed Project. No mitigation is required.

18c. **Less than significant impact.** The amount and rate of storm water runoff from the currently undeveloped Project site and off-site improvement area would be altered with the construction of the proposed warehouse, Driveway 2, open landscaped area, and West Perry Street and Indian Avenue intersection improvements. The proposed Project would require construction of a new on-site storm water drainage system to accommodate the additional run-off associated with the increase of impervious surfaces within the Project site and off-site improvement area.

According to the Preliminary WQMP prepared by Webb (Appendix K), on-site flows generated by the proposed Project will be collected and conveyed using a combination of surface flows, ribbon gutters, curb and gutters, drop inlets, and a storm drain system. The storm drain system will be used to convey flows into the proposed water quality basin, located at the northern portion of the site which will then drain into a proposed pump station that will control the total outflow from the site. The discharge will go into the existing Lateral E-3.2, which then discharges into the Line E-3 storm drain. The pump station will discharge a maximum outflow of 5 cfs to mitigate the increase in runoff and not adversely affect the downstream facilities and properties (Webb pp. 6-7, Appendix K) (see **Figure 8**). The storm water run-off will discharge into the Perris Valley Storm Drain. Therefore, because implementation of the proposed Project will include a water quality basin and infrastructure improvements that tie into the existing storm drain system and will not increase storm water runoff, impacts in regards to the construction of storm water drainage facilities will be less than significant. No mitigation is required.

18d. **Less than significant impact.** The Project site and off-site improvement area is located within the EMWD service area, which would supply water to the proposed Project. In compliance with Sections 10910–10915 of the *California Water Code* (commonly referred to as "Senate Bill [SB] 610" according to the enacting legislation), a WSA was prepared for the PVCCSP to assess the impact of development allowed by the Specific Plan on existing and projected water supplies. The EMWD approved this WSA in July 2011 and determined that existing and planned EMWD water supplies are sufficient to meet Project-related demands (Perris 2011, p. 4.11-29). Recently, EMWD adopted its updated 2015 Urban Water

Management Plan (UWMP), which contains more accurate projections for water supply and ability to serve the proposed Project area.

Relationship to PVCCSP

Development within the PVCCSP will increase demand for water supplies within the EMWD's service area. According to the PVCCSP WSA, based on the PVCCSP land use designations, at buildout, the PVCC is anticipated to have a projected water demand of 2,671.5 acre-feet per year (Perris 2011, pp. 4.11-29). The WSA prepared for the PVCCSP was based on assumptions in the EMWD and Metropolitan's Water District's (MWD's) 2010 UWMPs and it was determined that there would be sufficient water supplies to serve proposed development within the PVSCCSP.

Determination of Supply Reliability for Project

The EMWD adopted its 2015 UWMP, which details the reliability of EMWD's current and future water supply. The EMWD has four sources of water supply: imported water from the MWD, local groundwater, desalinated groundwater, and recycled water. EMWD has several planned projects that will increase regional supply reliability by increasing local supplies and decreasing demands for imported water from the MWD including increasing local groundwater banking through the Enhanced Recharge and Recovery Program, expanding the desalter program with the Perris II Desalter, and full utilization of recycled water through implementation of Integrated Resource Plan. Additionally, the EMWD aggressively promotes the efficient use of water through implementation of local ordinances, conservation programs and an innovative tiered pricing structure (EMWD 2016, p. 7-12).

In 2015, approximately 40 percent of the EMWD's total retail supply was imported from the MWD (EMWD 2016, p. 6-2). The MWD has also prepared a Regional UWMP and Integrated Water Resource Plan to detail their ability to provide water in times of shortage and address concerns regarding water supply reliability based on recent judicial decisions affecting the State Water Project and potential impacts due to climate change and drought. Based on the information provided in the MWD's 2015 UWMP, the MWD has sufficient supply capabilities to meet the expected demands of its member agencies from 2020 through 2040 under normal, historic single-dry and historic multiple-dry year conditions (EMWD 2016, p. xv).

EMWD Will Serve Determination

On September 4, 2018, the EMWD issued a Will Serve letter stating that the agency is willing to provide water and sewer service to the proposed Project. The provisions of service are contingent upon the Project developer completing the necessary arrangements in accordance with EMWD rules and regulations. The EMWD expects the developer to provide proper notification when a water demand assessment is required pursuant to SB 221 and/or SB 610. The EMWD also expects the Project developer to coordinate with the approving agency for the proper notification. Further arrangements for the service from the EMWD may also include plan check, facility construction, inspection, jurisdictional annexation, and payment of financial participation charges. (EMWD 2018, Appendix O).

The EMWD determined that it will be able to provide adequate water supply to meet the potable water demand for future development allowed by the PVCCSP as part of its existing and future demands. Therefore, it can be concluded that there are

sufficient water supplies available to serve the proposed Project, which is consistent with the land use assumptions of the PVCCSP for industrial uses, from the EMWD's existing entitlements and resources as set forth in its 2015 UWMP and the MWD's 2015 UWMP. New projects within the EMWD's service area may be required to help fund new water supply sources; however, the extent of funding will be determined by the EMWD and may take the form of a new component of connection fees or a separate charge. Details on funding will be developed with the plan of service for the proposed Project site and off-site improvement area. Therefore, because the proposed Project is consistent with the land use designation for the site and with payment of applicable fees, impacts will be less than significant and no mitigation is required.

18e. **Less than significant impact.** Development associated with the PVCCSP will result in an increase in the amount of wastewater generated within the EMWD's service area. Based upon the PVCCSP land use designations, the PVCC is anticipated to generate approximately 5,316,295 gallons of wastewater per day to be treated at the PVRWRF (Perris 2011, p. 4.11-42). As discussed under *Threshold 18a* above, the PVRWRF has typical daily flows of approximately 13.8 mgd, with a current capacity of approximately 22 mgd and an ultimate capacity of 100 mgd (EMWD 2016); thus, the total demand from the PVCC represents approximately 24 percent of the PVRWRF current capacity. A portion of the current wastewater treated at this plant consists of diversions from elsewhere in the EMWD's service area. Therefore, because the EMWD's wastewater diversions are operational decisions and because there is sufficient capacity in the EMWD's other wastewater treatment facilities to accommodate additional wastewater flows, overall the EMWD has sufficient capacity to treat all wastewater generated by the PVCC.

Based on the wastewater generation factor of 1,700 gallons per day per acre for both General Industrial and Light Industrial PVCCSP land use designations applied in the PVCCSP EIR (Perris 2011, Table 4.11-I), the Project's approximate 26.84-acre Project area of proposed industrial warehouse uses would generate approximately 45,628 gpd (approximately 0.05 mgd) of wastewater that would be treated at the PVRWRF. Use of this Table to calculate wastewater generation is appropriate because solid waste generation factors have, at most, not meaningfully increased since 2011. As such, the proposed Project's wastewater generation represents less than one percent of the PVCCSP's total estimated wastewater generation (5.3 mgd) and the proposed Project generates a nominal increase (0.05 mgd) that would not significantly impact the PVRWRF currently capacity of 22 mgd.

Since the proposed Project consists of construction of a warehouse building, it is consistent with the Light Industrial (LI) land use designation in the PVCCSP and will not result in impacts greater than those analyzed in the PVCCSP EIR. Therefore, implementation of the proposed Project will have a less than significant impact on EMWD's ability to treat wastewater and will not contribute significantly to require construction or operation of new or expanded wastewater facilities. No mitigation is required.

18f. **Less than significant impact.** Trash, recycling, and green waste service in the City are provided by CR&R Waste Services. In addition to normal trash collection, the County of Riverside also sponsors several hazardous waste collection events throughout the year. Waste is transported to the Perris Transfer Station and Materials Recovery Facility located at 1706 Goetz Road Perris, California 92570, approximately 5 miles south of the Project site and off-site improvement area. At this

facility, recyclable materials are separated from solid wastes. Recyclable materials are sold in bulk and transported for processing and transformation for other uses. Solid waste produced from the proposed Project would be transported to either (1) the Badlands Landfill on Ironwood Avenue in Moreno Valley, which has a permitted daily capacity of 4,800 tons per day or (2) the El Sobrante Landfill on Dawson Canyon Road in Corona, with a permitted daily capacity of 16,054 tons per day (CalRecycle 2018a, 2018b).

Construction-Related Solid Waste

Overall, construction associated with projects within the PVCCSP area is anticipated to generate approximately 104,671.09 tons of construction-related solid waste over a 20 year buildout period (Perris 2011, pp. 4.11-43). Therefore, given the limited contribution of solid waste during an extended construction period, the PVCCSP EIR concluded that construction within the PVCC would have a less than significant contribution to the exceedance of the permitted capacity of the designated landfills.

Based on the U.S. EPA's construction waste generation factor for light industrial projects of 3.89 pounds per square foot (Perris 2011, Table 4.11-J), the proposed Project (approximately 428,730-square-foot warehouse building) will generate approximately 833.88 tons of construction-related solid waste This represents approximately one percent of the total estimated construction-related waste to be generated by development of allowed PVCCSP uses, which was determined to be able to be accommodated by the landfills serving the City. Additionally, the proposed Project's generation of approximately 833.88 tons of solid waste would be approximately 17 percent of the Badlands Landfill permitted capacity or approximately 5 percent of the El Sobrante Landfill during the short-term construction activities. Therefore, the disposal of construction-related solid waste associated with the proposed Project would not exceed the permitted capacity of the Badlands or El Sobrante landfills and there would be a less than significant impact. No mitigation is required.

Operational Solid Waste

The PVCCSP EIR estimates that operation of future development under the Specific Plan would generate approximately 544,048.96 tons per year of solid waste (Perris 2011, Table 4.11-K), which was determined to be approximately 10.65 percent of the combined annual capacity (i.e., yearly intake) of the Badlands and El Sobrante landfills. Use of this Table to calculate solid waste generation is appropriate because solid waste generation factors have, at most, not meaningfully increased since 2011. The PVCCSP DEIR concluded that, with development of the PVCCSP, operational solid waste would not substantially contribute to exceeding the permitted capacity of these landfills (Perris 2011, p. 4.11-45).

Based on the California Department of Resources, Recycling and Recovery operational solid waste disposal factor of 0.0108 ton per square feet per year for the Light Industrial PVCC land use designation, the proposed 428,730-square-foot industrial warehouse/manufacturing uses would generate approximately 4,631 tons per year (approximately 12.69 tons per day) of solid waste requiring landfill disposal. This represents approximately one percent of the estimated annual operational solid waste stream for development of allowed PVCCSP uses, which was determined to be accommodated by the landfills serving the City. Additionally, the proposed Project's generation of approximately 12.69 tons per day of solid waste would be

less than one percent of the Badlands Landfill and El Sobrante Landfill permitted daily capacity. Therefore, consistent with the findings of the PVCCSP EIR, the disposal of operational solid waste associated with the proposed project would not exceed the permitted capacity of the Badlands or El Sobrante Landfills and there would be a less than significant impact. No mitigation is required.

18g. **Less than significant impact.** Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to decrease solid waste generation through mandatory reductions in solid waste quantities (e.g., through recycling and composting of green waste) and the safe and efficient transport of solid waste. The proposed Project would be required to coordinate with CR&R Waste Services to develop a collection program for recyclables, such as paper, plastics, glass and aluminum, in accordance with local and State programs, including the California Solid Waste Reuse and Recycling Act of 1991. Additionally, the proposed project would be required to comply with applicable practices enacted by the City under the California Integrated Waste Management Act of 1989 (AB 939) and any other applicable local, State, and federal solid waste management regulations. AB 939 requires all counties to prepare a County Integrated Waste Management Plan (CIWMP). The County of Riverside adopted its CIWMP in 1998. The CIWMP includes the Countywide Summary Plan; the Countywide Siting Element; and the Source Reduction and Recycling Elements, the Household Hazardous Waste Elements, and Non-disposal Facility Elements for Riverside County and each city in Riverside County. In summary, the proposed Project would comply with all regulatory requirements regarding solid waste. Therefore, impacts would be less than significant and no mitigation is required.

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

References: References: RCIT, Perris 2005a, Perris 2005b, Perris 2011, RCA, GLA (Appendix D), and GLA (Appendix E), BFSA (Appendix F), and BFSA (Appendix G).

Explanation of Checklist Answers

19a. **Less than significant impact with mitigation.** The proposed Project area contains some sensitive biological resources that could potentially be affected by the proposed Project. All potentially significant impacts to biological resources would be reduced to a less than significant impact or reduced to less than significant impact with the implementation of the mitigation measures identified in Section 5.4, Biological Resources, of this IS.

There are no known historic resources at the Project site or off-site improvement area and the Project will have a less than significant impact in this regard. An intensive reconnaissance archaeological survey was conducted by BFSA on May 23, 2018 and January 25, 2019. During the intensive reconnaissance archaeological survey, BFSA observed dirt utility access roads along the northern and western perimeters of the Project site; a concrete "U"-ditch along the southern boundary of the Project site; storm drain culverts just outside of the southeastern and southwestern corners of the Project site; and piles of dumped dirt, concrete, and modern construction debris within the northern half of the Project site. BFSA also observed loose gravel/asphalt road that traverses the Project site, a concrete slab, modern standpipe/spigot, dirt utility roads, concrete ditch, piles of dirt, concrete, and construction debris on the Project site. BFSA concluded that the loose gravel access road and concrete slab with a modern spigot do not qualify as significant historic resources under CEQA (BFSA p. 1 and p. 29, Appendix F). BFSA observed piles of dumped dirt and tire tracks connecting the proposed warehouse location and Indian Avenue on the off-site improvement area; no cultural resources were found within the off-site improvement area.

Further, the Project site and off-site improvement area has been previously disturbed by past agricultural and disking activities; thus, it is unlikely that any cultural resources exist. However, in order to provide protection in the unlikely event that cultural resources are unearthed during Project construction, implementation of mitigation measures outlined in Section 5.5, Cultural Resources, of this IS will reduce potential impacts to less than significant.

19b. **Less than significant impact with mitigation.** The proposed Project is being developed according to the PVCCSP and is an allowed use under the Project site's and off-site improvement area's Light Industrial (LI) land use designation in the PVCCSP; however, the PVCCSP will result in several cumulatively considerable impacts (Perris 2011, p. 5.0-13). Analysis contained in the PVCCSP DEIR determined that construction associated within the PVCCSP may have cumulatively significant impacts in the following areas:

- *Air Quality:* Emissions generated by the overall PVCC area will exceed the SCAQMD's recommended thresholds of significance;
- *Noise:* Development in the overall PVCC area could result in substantial increases in the ambient noise environment at Project buildout; and
- *Transportation:* Potential cumulative impacts to I-215 freeway, which is consistent with the findings in the City's GP 2030.

However, as demonstrated by the analysis in this IS, the proposed Project will not result in any significant environmental impacts. The Project is consistent with local

and regional plans, and the Project's air quality emissions do not exceed established thresholds of significance. Additionally, the proposed Project will not cause a substantial increase in ambient noise levels. The Project adheres to all other land use plans and policies with jurisdiction in the Project area, and will not cause a significant increase in traffic volumes within the Project area. The Project would be subject to all of the applicable mitigation measures from the PVCCSP EIR to ensure any Project contribution to cumulative impacts remain at a level below significance. Therefore, the proposed Project will not have impacts that are individually limited, but cumulatively considerable, and impacts will be less than significant with mitigation incorporated.

19c. **Less than significant impact with mitigation.** Effects on human beings were evaluated as part of this analysis of this IS under the aesthetics, air quality, cultural resources as it relates to human remains, geology and soils, GHG, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation and traffic, tribal cultural resources, and utilities and service systems thresholds. Based on the analysis and conclusions in this IS, impacts for these topics were considered to have no impact, less than significant impact, or less than significant impact with mitigation incorporated.

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