ALBERT A. WEBB ASSOCIATES

Initial Study/Mitigated Negative Declaration

First Industrial Warehouse at Rider Street & Redlands Avenue Project

Prepared for the Lead Agency:

April 2021

www.webbassociates.com

Initial Study/Mitigated Negative Declaration No. 2358

FIRST INDUSTRIAL WAREHOUSE AT RIDER STREET AND REDLANDS AVENUE PROJECT DPR 19 00016

Lead Agency:

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

April 2021

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ACRONYMS LIST

Acronym	Definition
AB 32	Assembly Bill 32
AB 52	Assembly Bill 52
ADA	American Disabilities Act
AFY	Acre Feet Per Year
AICUZ	Air Installation Compatible Use Zone Study
ALUC	Airport Land Use Commission
AQMP	Air Quality Management Plan
APE	Area of Potential Effect
APN	Assessor Parcel Number
APZ	Accident Potential Zone
BMP	Best Management Practice
BSA	Biological Study Area
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEAP	Community Energy Action Plan
CEQA	California Environmental Quality Act
City	City of Perris
CNPS	California Native Plant Society
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
dBA	A-Weighted Decibels
DIF	Development Impact Fees
DPM	Diesel Particulate Matter
DPR	Development Plan Review
EIC	Eastern Information Center
EIR	Environmental Impact Report
EMWD	Eastern Municipal Water District
EPA	U.S. Environmental Protection Agency
ERRP	Enhanced Recharge and Recovery Program
ESA	Endangered Species Act
EV	Electric vehicle
FAR	Floor Area Ratio
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping Management Program
FTA	Federal Transit Administration
GHG	Greenhouse Gas
GP	City of Perris General Plan 2030
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
gpd/acre	Gallons per Dday per Aacre
HABS	Historic American Buildings Survey
HAER	Historic American Engineering Record
HANS	Habitat Evaluation and Acquisition Negotiation Strategy
HCP	Habitat Conservation Plan
IPA LUCP	Inland Port Airport Land Use Compatibility Plan
I-215	Interstate 215
IS	Initial Study

JPR	Joint Project Review
LID	Low Impact Design
LOS	Level of Service
LST	Localized Significance Threshold
MARB	March Air Reserve Base
mgd	million gallons per day
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
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
$MTCO_2e$	Metric Tons Carbon Dioxide Equivalent
MWD	The Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NCCP	Natural Communities Conservation Plan
ND	Negative Declaration
NEPSSA	Narrow Endemic Plant Species Survey Area
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NPRBBD	North Perris Road and Bridge Benefit District
PQP	Public/Quasi-Public
PM-2.5	Particulate Matter Less Than 2.5 Microns in Diameter
PM-10	Particulate Matter Less Than 10 Microns in Diameter
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
PVSDC	Perris Valley Storm Drain Channel
RCA	Regional Conservation Authority
RCFC&WCD	Riverside County Flood Control and Water Conservation District
RCTC	Riverside County Transportation Commission
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
SGMA	Sustainable Groundwater Management Act
SF	Square Feet
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SKR	Stephen's Kangaroo Rat
SLF	Sacred Lands File
SRA	State Responsibility Area
SSC	Species of Special Concern
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TIA	Traffic Impact Analysis
TUMF	Transportation Uniform Mitigation Fees
USACE	U.S. Army Corps of Engineers

USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled
WQMP	Water Quality Management Plan
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 First Industrial Warehouse at Rider Street and Redlands Avenue Project (proposed Project) could result in potentially significant environmental impacts that would require the preparation of an Environmental Impact Report (EIR). Section 5.0 of this Initial Study has evaluated each of the issue areas contained in Appendix G to the State CEQA Guidelines. 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 or uniformly applicable development policies, then 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 all 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 is within the Perris Valley Commerce Center Specific Plan (PVCCSP) area of the City of Perris. The PVCCSP was adopted by the City of Perris on January 12, 2012 (Ordinance No. 1284). 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), which was certified by the City of Perris in January 2012. The PVCCSP EIR is a program EIR and project-specific evaluations in 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).

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 of Perris 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 of Perris requires that future development projects in the Specific Plan area comply with the required PVCCSP Standards and Guidelines and applicable PVCCSP EIR mitigation measures as outlined in

the MMRP and that these requirements are implemented in a timely manner. Relevant Standards and Guidelines and applicable 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 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 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 Initial Study. It contains a series of questions about the proposed Project for each of the listed environmental topics. The Form is used to evaluate whether 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
- Energy
- 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
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

As identified through the analysis presented in this IS, with incorporation of applicable mitigation measures from the PVCCSP EIR and PVCCSP Standards and Guidelines, 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:

Alfredo Garcia, Associate 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 15-acre (net) Project site is located at the southeast corner of Rider Street and Redlands Avenue, within the PVCCSP area in the City of Perris, Riverside County, California. The Project site is located within Section 5, Township 4 South, Range 3 West, San Bernardino Base and Meridian, on the Perris, 7.5-minute topographical quadrangle map. **Figure 1 – Vicinity Map, Figure 2 – Aerial Map** and **Figure 3 – USGS Topographic Map** depict the regional location and local vicinity of the Project site, respectively.

The Project site is relatively flat and is situated at an elevation approximately 1,450 feet above mean sea level. The Project site is unoccupied and currently comprises five contiguous parcels, with four out of five parcels containing structures, outbuildings, greenhouses, or storage yards used for both commercial, residential, and religious uses by the previous owners. Otherwise, the Project site is undeveloped vacant land (Assessor's parcel numbers (APNs): 300-210-001, -002, -003, -004, and -005). The Project site (including roadway and off-site drainage/utility improvements along the Project frontage) has a City of Perris General Plan land use designation and zoning designation of PVCCSP – Perris Valley Commerce Center Specific Plan, as shown on **Figure 4 – General Plan Land Use**) and a PVCCSP land use designation of Light Industrial, as shown on **Figure 5 – Specific Plan Land Use**.

The area surrounding the Project site is currently redeveloping into light industrial uses with vacant land to the north, legal, non-conforming single family residential uses on land with a Specific Plan land use designation of Light Industrial to the immediate east and south, vacant land and light industrial to the west.

The Project site is located on land designated by the California Department of Conservation's Farmland Mapping and Monitoring Program as Farmland of Local Importance and Other Land.

As further discussed in the Biological Resources section of this Initial Study (*Thresholds 5.4a – 5.4f)*, the Project site is within the jurisdiction of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Mead Valley Area Plan. The Project site is composed of existing single-family residential housing, industrial use, agricultural use and disturbed vegetation with generally flat undeveloped terrain that receives frequent weed abatement (i.e., chain flail mowing, disking). The Project site is not located within any designated MSHCP "Criteria Area" or "Subunits", and it is not within a "Core" or "Linkage" area. The Project does not fall within any Public/Quasi-Public (PQP) or other MSHCP Conserved Lands.

The proposed Project site is located approximately 2.5 miles southeast of the March Air Reserve Base/Inland Port Airport (MARB/IPA) and is subject to the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP). The MARB/IPA LUCP divides the area close to the airport into zones based on proximity to the airport and perceived risks. The proposed Project site is within Airport Overlay Zones B2 and C1 as shown on **Figure 6 – MARB Compatibility Zones**. The proposed Project site is not located within a MARB/IPA Accident Potential Zone.

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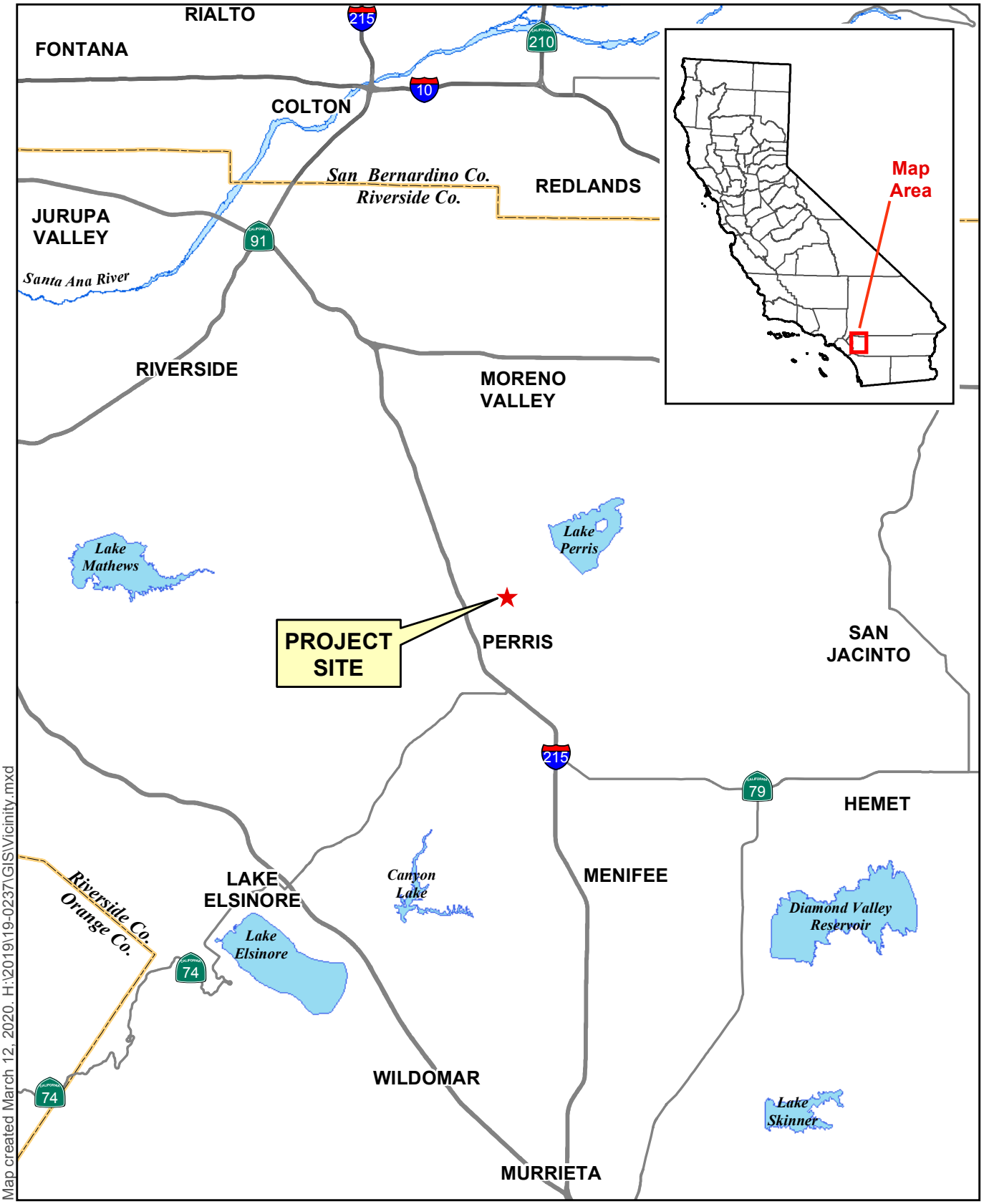

Figure 1 – Vicinity Map

First Industrial Rider

ALBERT A. WEBB ASSOCIATES

H:\2019\19-0237\GIS\Aerial.mxd; Map created 12 Mar 2020

Sources: Riverside Co. GIS, 2020, (parcels, streets) and 2016 (imagery).

0 400 800 Feet

Figure 2 - Aerial Map

First Industrial Rider

ALBERT A. WEBB ASSOCIATES

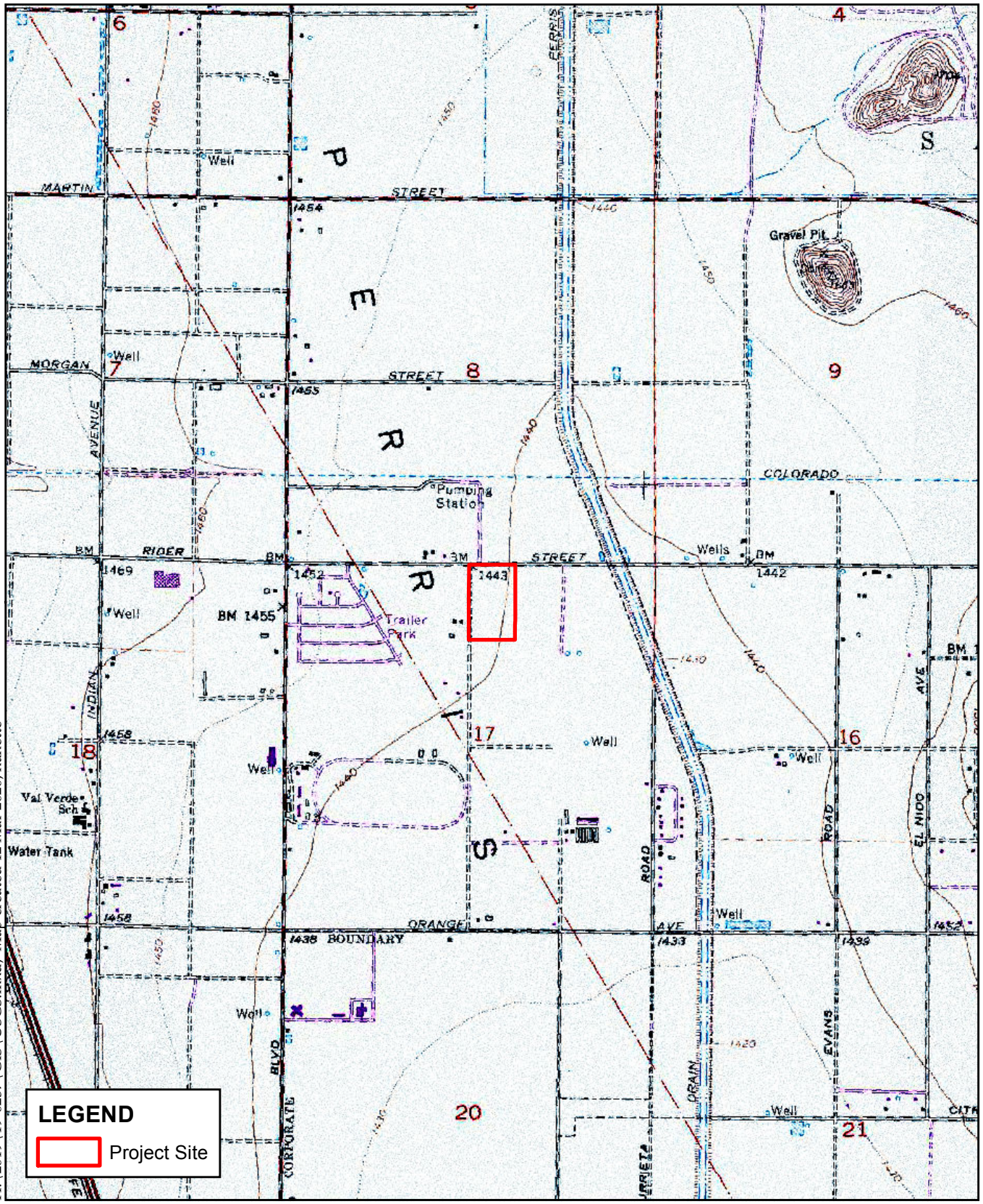

Figure 3 - USGS Topological

First Industrial Rider

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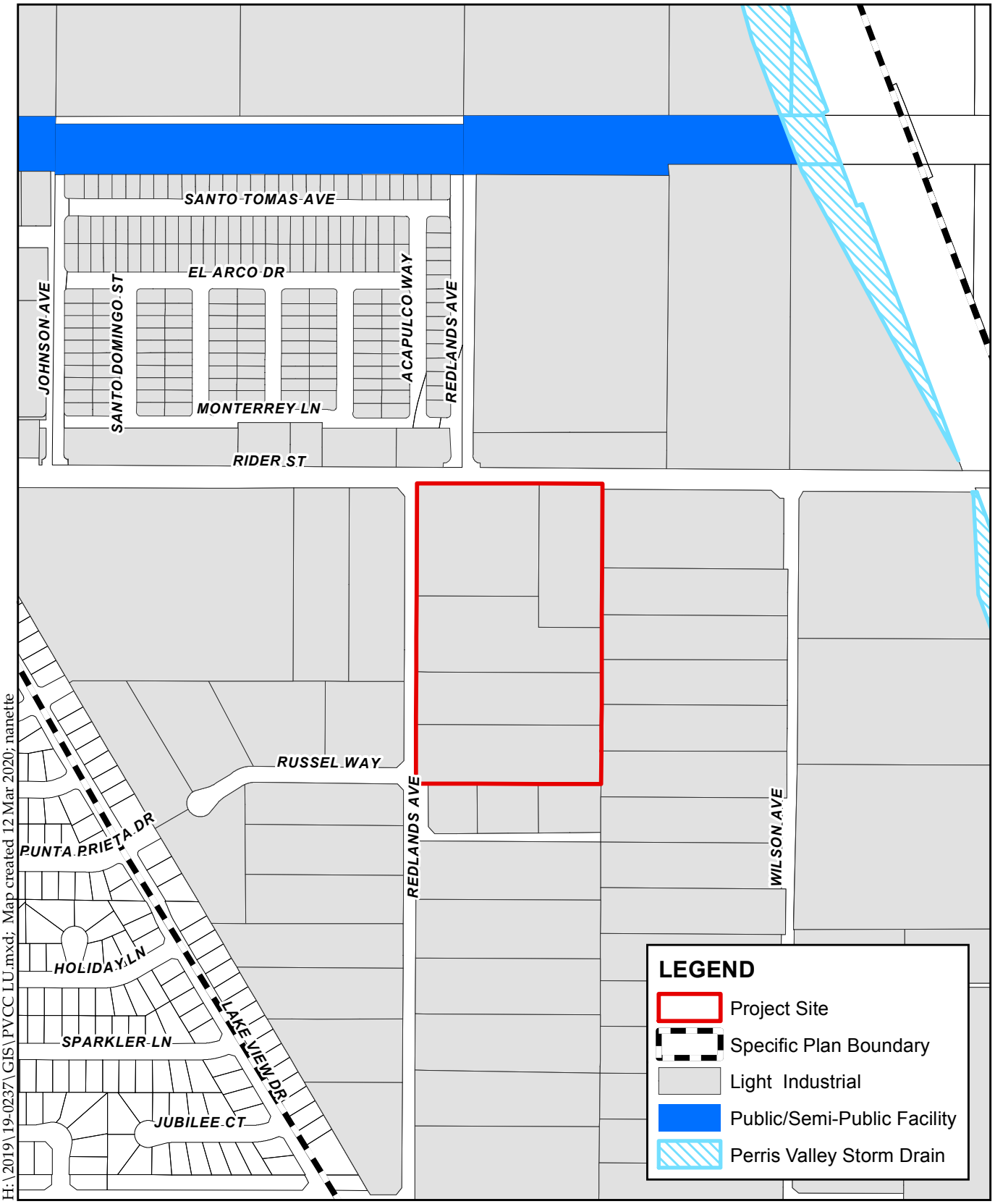
Sources: City of Perris, 2013;
Riverside Co. GIS, 2020.

0 500 1,000 Feet

Figure 4 - General Plan Land Use
First Industrial Rider

ALBERT A. WEBB ASSOCIATES



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Sources: Perris Valley Specific Plan, as modified through 2018; Riverside Co. GIS, 2020.

0 500 1,000 Feet

Figure 5 - Specific Plan Land Use

First Industrial Rider

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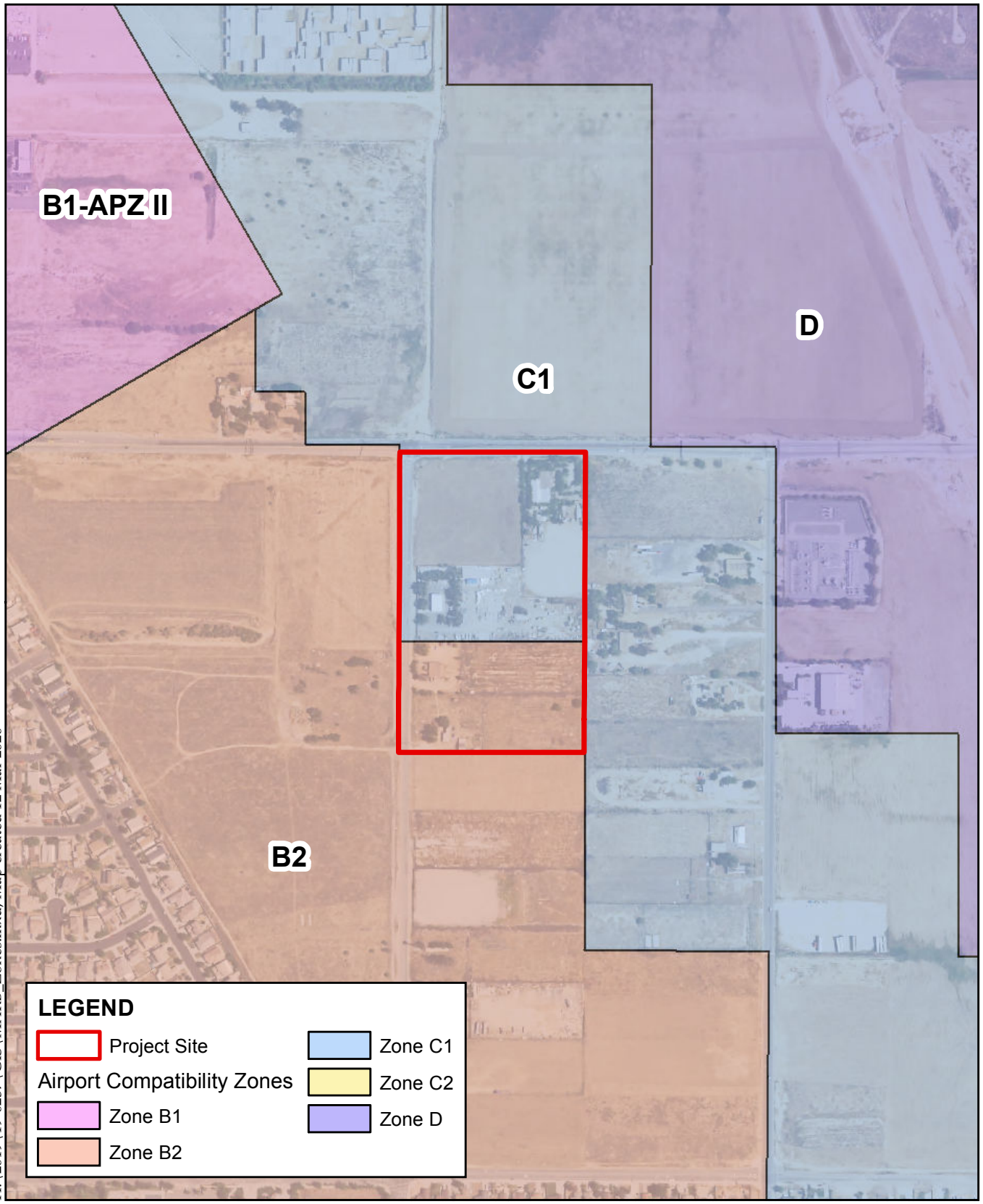

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Sources: Riverside Co. GIS, 2020;
USDA NAIP, 2016.

0 500 1,000 Feet

Figure 6 - MARB Compatability Zones

First Industrial Rider

ALBERT A. WEBB ASSOCIATES

2.2 PROJECT DESCRIPTION

The proposed First Industrial Warehouse at Rider Street and Redlands Avenue Project and offsite improvement area (herein collectively referred to as proposed Project or Project) involves the construction and operation of an approximately 324,147-square-foot (SF) industrial, non-refrigerated warehouse distribution facility, with 8,000 SF of office space and 4,000 square feet of mezzanine space on the 16.25-acre (gross) site, of which approximately 1.40 acres will go for street dedication, for a net site area of 14.85-acres (see **Figure 7 – Proposed Site Plan**). The speculative warehouse/distribution building is assumed to operate 24 hours a day 7 days a week.

The proposed Project has been designed to comply with the applicable Standards and Guidelines outlined in the PVCCSP, including but not limited to landscape, parkway, setback, lot coverage, Floor Area Ratio (FAR), architectural requirements, employee amenities, and residential buffer requirements as shown on **Figure 8 - Elevations**. The warehouse building will feature approximately 43 truck dock doors. Additionally, the Project proponent has committed to achieve LEED "Certified" status for the building.

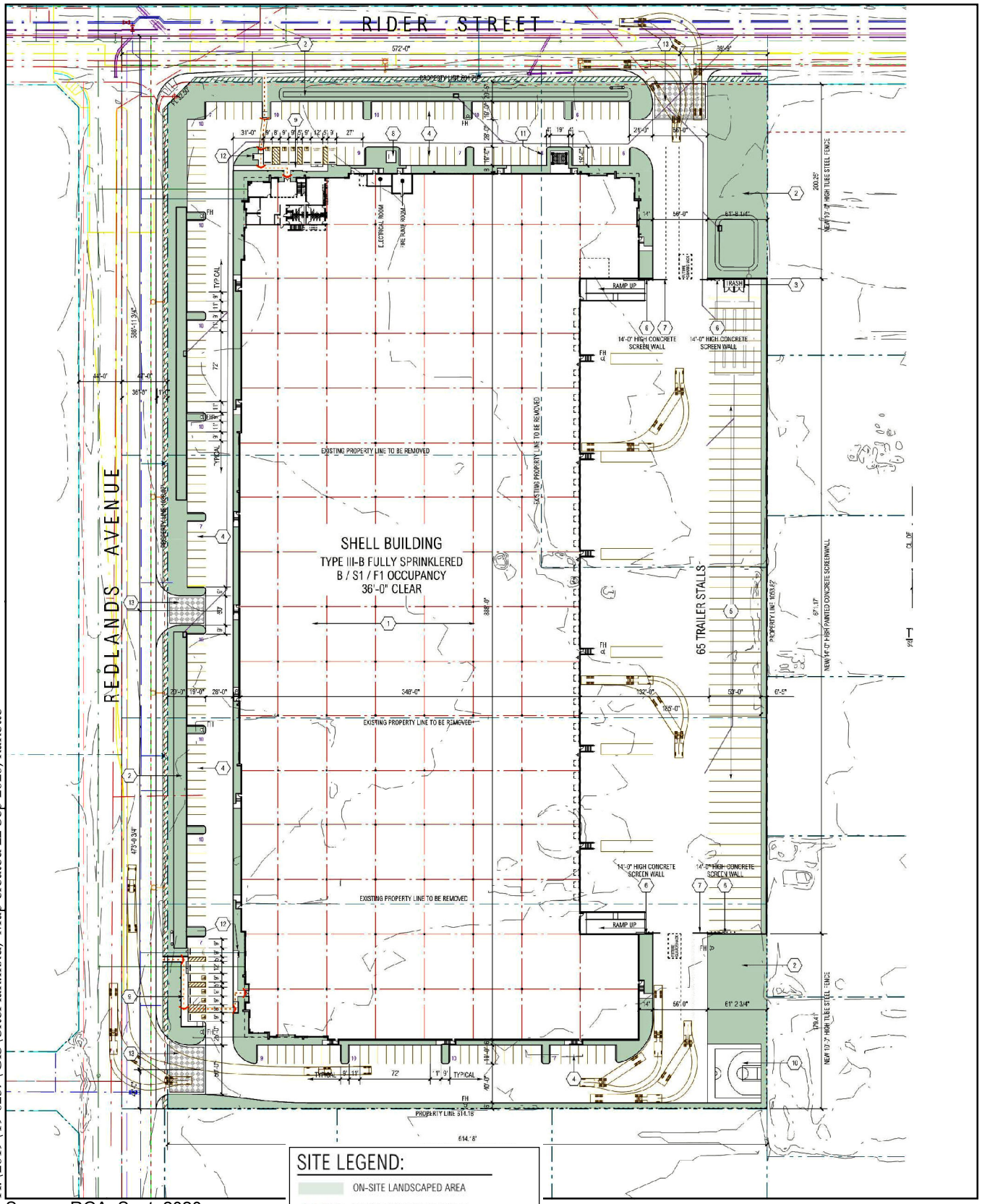
Access to the Project site will be provided from Redlands Avenue and Rider Street via three driveways; the south most driveway on Redlands Avenue and the driveway on Rider Street will have direct access to the truck yard. The other driveway on Redlands Avenue will be restricted to passenger vehicles. As shown in **Figure 7 – Proposed Site Plan**, automobile and trailer parking would be provided at the site; the number of parking spaces provided would be consistent with the parking requirements outlined in Perris Municipal Code, Chapter 19.69. A total of 65 trailer truck parking stalls would be provided on the east side of the proposed building. A total of 200 auto parking stalls will be provided along the northern, southern, and western sides of the facility, including eight handicapped-accessible stalls and 192 standard stalls. Pursuant to Section 5.106.5.2 of the 2019 California Green Building Standards Code (CCR, Title 24, Part 11 – CalGreen), 16 of the parking spaces will be designated for low-emitting, fuel efficient, and carpool/vanpool vehicles. Pursuant to Section 5.106.5.3.2 of the CalGreen Code, 10 parking spaces will provide equipment for the charging of electric vehicles (EV). Further, 10 bicycle parking locations are provided around the building.

Landscaping, screen walls, and fencing will be provided on site as required for screening, privacy, and security as shown on **Figure 8** and **Figure 9 – Landscape Plan**. The Project also includes approximately 81,809 SF of on-site landscaping, four on-site stormwater bio-retention water quality basins and one underground stormwater holding chamber. The Project is designed to include a 10-foot-high tubular steel fence along the south side of the Project site boundary. Truck loading docks and truck parking will be located on the eastern side of the building and will be enclosed on the north, south, and west side by 14-foot-high concrete tilt-up screen walls. Access to the truck yard will be through two 9-foot-high wrought iron rolling gates and two guard shacks placed at the north and south side of the truck yard. As noted, the Project site will include onsite landscaping. Landscaping will be provided along the street frontages, along the walls and fencing on the south and east sides of the property, and adjacent to the north, west, and south sides of the proposed building. The northeast corner of the site will be landscaped with a water quality basin and the southeast corner of the site will be landscaped for the employee break area. Vehicle parking located on the west, north, and south sides of the building and the buildings frontages will be visible from Redlands Avenue and Rider Street.

The Project includes minimal subsurface storm drains and will utilize curb and gutter, curb cuts, and valley gutters to convey on-site flows to four proposed water quality basins (Bio-retention Basins A, B, C, and D) and an underground storage system. Basins A and B will be located along Redlands Avenue to collect runoff from generally the western half of the Project site, including the western half

of the building, westerly drive aisle, and parking areas. The parking area to the north of the building will discharge into Basin C, located along Rider Street. All water quality runoff generated by the eastern half of the Project site will be directed into the underground storage chambers located at the north east corner of the truck court parking stalls. Water quality runoff will be pumped from the chambers into Basin D located at the north east corner of the Project site. Additionally, two subsurface storm drain lines will be constructed on-site; Line A and Line B. Storm drain Line B (approximately 410 linear feet) will convey flows generated by the eastern portion of the site into the underground storage chambers. The underground storage chambers will be designed to capture water quality volume and bypass higher degree runoff to proposed Line A. Storm drain Line A (approximately 1,080 linear feet) will collect the treated flows and higher degree flows from the bio-retention facilities on-site and underground storage chamber and convey them to existing storm drain Line A-B, located within Rider Street which drains into the Perris Valley Storm Drain Channel.

Trucks currently use the PVCCSP-designated truck route on the Harley Knox Boulevard interchange to access the freeway. However, a new freeway interchange is planned to be constructed at Placentia Avenue, which would be closer to the proposed Project site and is anticipated to be open by the time Project construction is complete. Signage shall be posted on-site directing truck drivers to use designated City truck routes to access the Interstate 215 (I-215) freeway. The information on the signage will be coordinated with City Planning and the City's Traffic Engineer during the plan check process.



H:\2019\19-0237\GIS\SitePlan.mxd; Map created 22 Sep 2020; nanette

Source: RGA, Sept. 2020.

Not to Scale

Figure 7 – Proposed Site Plan

First Industrial Rider

ALBERT A. WEBB ASSOCIATES

H:\2019\19-0237\GIS\Elevations.mxd; Map created 22 Sep 2020; nanette

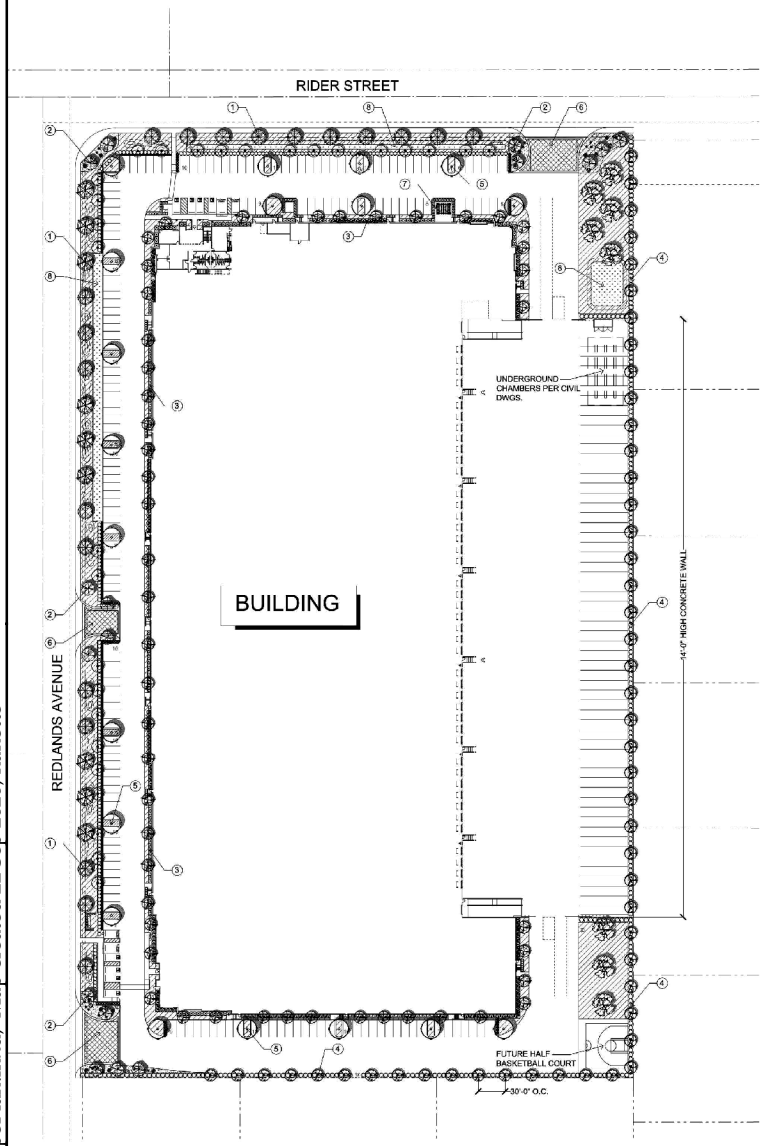
Source: RGA, Sept. 2020.

Figure 8 – Elevations

First Industrial Rider

Not to Scale

ALBERT A. WEBB ASSOCIATES



DESIGN KEY NOTES:

1. NEW STREET TREE PER LEGEND.
2. FLOWERING ACCENT TREE AT FOCAL AREAS.
3. VERTICAL SHRUB ALONG BUILDING PER LEGEND.
4. EVERGREEN SCREEN TREE PER LEGEND.
5. PARKING LOT SHADE TREE PER LEGEND.
6. ENHANCED PAVING AT VEHICULAR ENTRY DRIVE.
7. EMPLOYEE BREAK AREA
8. BASIN PER CIVIL DWGS.

PLANTING LEGEND

TREES SYMBOL	TREE NAME	QTY.	WUCOLS
	NEW STREET TREE ALONG REDLANDS AVE. LAGERSTROEMIA I. 'WATERMELON RED', CRAPE MYRTLE 24" BOX SIZE.	9	L
	NEW STREET TREE ALONG REDLANDS AVE. & RIDER ST. RHUS LANCEA, AFRICAN SUMAC 24" BOX SIZE.	20	L
	FLOWERING ACCENT TREE CERCIDIUM X 'DESERT MUSEUM, BLUE PALO VERDE 24" BOX SIZE.	16	L
	PARKING LOT SHADE TREE ULMUS PARVIFOLIA, CHINESE ELM TREE 36" BOX SIZE.	19	L
	SECONDARY PARKING LOT TREE TRISTANIA CONFERTA, BRISBANE BOX 15 GAL. SIZE.	28	L
	VERTICAL TREE ALONG BUILDING PODOCARPUS GRACILIOR, FERN PINE 15 GAL. SIZE.	49	L
	LARGE CA NATIVE TREE QUERCUS AGRIFOLIA, COAST LIVE OAK 24" BOX SIZE.	8	L
	EVERGREEN SCREEN TREE PINUS ELDARICA, MONDELL PINE 24" BOX SIZE.	51	L

SHRUBS & ACCENT SUCCULENTS SYMBOL	NAME	WUCOLS
	DODONAEA VISCOSA 'PURPUREA', PURPLE HOPSEED BUSH 5 GAL. SIZE.	L
	WESTRINGIA FRUTICOSA, COAST ROSEMARY 5 GAL. SIZE.	L
	LEUCOPHYLLUM FRUTESCENS, TEXAS RANGER 5 GAL. SIZE.	L
	LIGUSTRUM TEXANUM, TEXAS PRIVET 5 GAL. SIZE.	L
	CALLISTEMON 'LITTLE JOHN', DWARF BOTTLE BRUSH 5 GAL. SIZE.	L
	DIETES BICOLOR, FORTNIGHT LILY 5 GAL. SIZE.	L

GROUND COVERS SYMBOL	NAME	WUCOLS
	ROSMARINUS O. 'PROSTRATUS', CREEPING ROSEMARY 1 GAL @ 24" O.C.	L
	BULBINE FRUTESCENS, ORANGE STALKED BULBINE 1 GAL SIZE @ 30" O.C.	L
	MUHLENBERGIA RIGENS, DEER GRASS 1 GAL @ 42" O.C.	L
	SALVIA CLEVLANDII, CLEVLAND SAGE 5 GAL @ 48" O.C.	L
	DIANELLA TASMANICA 'VARIEGATA', WHITE STRIPED TASMAN FLAX LILY 1 GAL @ 24" O.C.	L
	DECOMPOSED GRANITE	
	EROSION CONTROL GROUND COVER AT BASIN SLOPE SUCH AS BACCHARIS PILULARIS, COYOTE BRUSH 1 GAL. SIZE @ 24" O.C.	L
	BOTTOM OF BASIN SHALL BE PLANTED WITH CAREX PRAEGRACILIS, CALIFORNIA FIELD SEDGE	L

ACCENT SUCCULENTS SYMBOL	NAME	WUCOLS
	AGAVE 'BLUE GLOW', BLUE GLOW AGAVE 5 GAL. SIZE.	L
	HESPERALOE PARVIFOLIA, RED YUCCA 5 GAL. SIZE	L
	BOUGAINVILLEA, LOW GROWING 'RED' 5 GAL. SIZE	L

H:\2019\19-0237\GIS\LandscapePlan.mxd; Map created 22 Sep 2020; nanette

Source: SPLA, Sept. 2020.

Not to Scale

Figure 9 – Landscape Plan

First Industrial Rider

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The PVCCSP Circulation Element designates Redlands Avenue and Rider Street, which are adjacent to the Project site, as a Secondary Arterial. Secondary Arterials within the PVCCSP generally range from 64-feet to 70-feet wide curb-to-curb with 6 feet of sidewalk on both sides depending on the particular design and traffic volumes to be served. In the vicinity of the Project site, Redlands Avenue and Rider Street are designated as 94-feet wide curb to curb. The Project applicant proposes to construct partial-width improvements on the east side of Redlands Avenue (up to 67 feet) and the south side of Rider Street (up to 67 feet) adjacent to Project site, including medians, curb and gutter, and sidewalk. Existing power poles along the Project frontage of Redlands Avenue will be removed and the power lines will be undergrounded.

In addition to the improvements at the Project site, the Project applicant proposes to construct a new 8-inch diameter recycled water pipeline in Redlands Avenue and Rider Street along the Project frontage connecting to recycled water pipelines at the intersection of Redlands Avenue and Rider Street that are proposed to be constructed by other developers. Potable water and sewer pipelines currently exist in Rider Street and Redlands Avenue; therefore, the only construction required is connection to the existing pipelines.

The proposed Project would be constructed in a single phase, and the earthwork would be balanced on the site. Construction is expected to commence in 2021 and be completed in 2022.

2.3 PROJECT APPROVALS

The proposed warehouse distribution facility is a permitted use consistent with the PVCCSP; therefore, no General Plan Amendment, Specific Plan Amendment, or zone change is required.

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

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

- Approve Development Plan Review (DPR No. 19-00016) to allow the development of the approximately 14.9-acre (net) site with an approximately 324,147-square-foot warehouse including approximately 8,000 square feet of supporting office space and 4,000 square feet of mezzanine space.

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 (PWQMP) 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;

- An encroachment permit from the Riverside County Flood Control and Water Conservation District (RCFC&WCD) for connection to Line A-B; and
- Approval of water and sewer improvement plans by the Eastern Municipal Water District (EMWD).

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 (GP). (Available at http://www.cityofperris.org/city-hall/general-plan.html)
- *Perris General Plan 2030 Draft Environmental Impact Report, SCH No. 2004031135,* certified April 26, 2005 (GP EIR). (Available at http://www.cityofperris.org/city-hall/general-plan/General_Plan_2030.pdf)
- *Perris Valley Commerce Center Specific Plan Amendment No. 9*, adopted February 20, 2019 (PVCCSP). (Available at https://www.cityofperris.org/Home/ShowDocument?id=2647)
- *Perris Valley Commerce Center Final Environmental Impact Report, SCH 2009081086*, certified January 10, 2012 (PVCCSP EIR). (Available at https://www.cityofperris.org/Home/ShowDocument?id=2645)

These reports/studies are also available for review at:

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

Hours: Monday – Friday: 8:00 AM to 6:00 PM

SECTION 3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology /Soils	☐ Greenhouse Gas Emission	☐ Hazards & Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	☐ 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.

Signature of Lead Agency Representative — Date: 5/11/21

Alfredo Garcia, Associate Planner — Printed name

City of Perris — 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 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	First Industrial Warehouse at Rider Street and Redlands Avenue Project Case No. PLN19 00016
Lead Agency Name and Address	City of Perris 135 North "D" Street Perris, CA 92570
Contact Person and Phone Number	Alfredo Garcia, Associate Planner (951) 943-5003
Project Location	The proposed Project site is located at the southeast corner of Rider Street and Redlands Avenue, in the City of Perris, California on approximately 15 acres (net), as shown on **Figure 1 –Vicinity Map** and **Figure 2 – Aerial Map.** The Project site is comprised of five parcels (APN: 300-210-001 through 005) located in Section 5 Township 4 South, Range 3 West of the San Bernardino Baseline and Meridian, identified on the Perris, California USGS 7.5 Quadrangle Map as reflected on **Figure 3 – USGS Topographical Map**.
Project Sponsor's Name and Address	First Industrial Realty Trust Attn: Michael Goodwin 898 N Sepulveda Boulevard, Suite 175 El Segundo, CA 90245
General Plan Designation	PVCCSP - Perris Valley Commerce Center Specific Plan
Zoning	Perris Valley Commerce Center Specific Plan (PVCCSP)
Specific Plan Designation	Light Industrial (LI)

Description of Project	The proposed First Industrial Warehouse at Rider Street and Redlands Avenue Project (Project) consists of an approximately 324,147-square-foot warehouse distribution facility including approximately 8,000 square feet of office space and 4,000 square feet of mezzanine space (**Figure 7 – Proposed Site Plan**). The Project proponent has committed to achieve LEED "Certified" status for the building. The Project will provide approximately 192 standard parking stalls and eight ADA parking stalls for a total of 200 vehicle parking spaces. The Project includes 65 trailer parking spaces. The number of parking spaces provided would be consistent with the Perris Municipal Code, Chapter 19.69 parking requirements. Parking spaces will also be designated for low-emitting, fuel efficient, and carpool/vanpool vehicles as well as electric vehicle charging pursuant to the CalGreen Code (Sections 5.106.5.2 and 5.106.5.3.2, The warehouse building will feature approximately 43 dock doors on the east side of the proposed building. There will be approximately 81,809 square feet of on-site landscaping as well as four on-site stormwater bio-retention water quality basins and one underground stormwater holding chamber. The Project includes minimal subsurface storm drain and will utilize curb and gutter, curb cuts, and valley gutters to convey on-site flows to four proposed water quality basins (Bio-retention Basins A, B, C, and D) and an underground storage system. The western half of the site drains to Basins A and B, the parking area to the north drains to Basin C, and the rest of the site drains to Basin D and the underground storage chambers. Water quality runoff will be pumped from the chambers into Basin D located at the north east corner of the Project site. Two subsurface storm drain lines will be constructed on-site; Line A and Line B. Storm drain Line B (approximately 410 linear feet) will convey flows generated by the eastern portion of the site into the underground storage chambers. Storm drain Line A (approximately 1,080 linear feet) will collect the treated flows and higher degree flows from four bio-retention facilities on-site and underground storage chamber and convey them to existing storm drain Line A-B, located within Rider Street which drains into the Perris Valley Storm Drain Channel. Trucks would use PVCCSP-designated truck routes to travel to and from the Project site. The PVCCSP Circulation Element designates Redlands Avenue and Rider Street, which are adjacent to the Project site, as a Secondary Arterial. The Project applicant proposes to construct partial-width improvements on east side of Redlands Avenue (up to 67 feet) and the south side of Rider Street (up to 67 feet) adjacent to Project site, including medians, curb and gutter, and sidewalk. Existing power poles along the Project frontage of Redlands Avenue will be removed and undergrounded.

<table>
<tr><td></td><td>The Project would be constructed in one phase and the earthwork would be balanced on the site. Construction is expected to be initiated in 2021 and completed in 2022.

The Project's proposed warehouse distribution facility is consistent with the PVCCSP; thus, no General Plan Amendment, Specific Plan Amendment, or zone change is required.</td></tr>
<tr><td>Surrounding Land Uses and Setting
(Refer to Figure 4 – General Plan Land Use and Figure 5 – Specific Plan Land Use)</td><td>
<table>
<tr><th>Boundary</th><th>General Plan Land Use</th><th>Zoning</th><th>Specific Plan Land Use</th><th>Existing Land Use</th></tr>
<tr><td>North</td><td>PVCCSP</td><td>PVCCSP</td><td>Light Industrial</td><td>Vacant</td></tr>
<tr><td>East</td><td>PVCCSP</td><td>PVCCSP</td><td>Light Industrial</td><td>Residential</td></tr>
<tr><td>South</td><td>PVCCSP</td><td>PVCCSP</td><td>Light Industrial</td><td>Vacant/Residential</td></tr>
<tr><td>West</td><td>PVCCSP</td><td>PVCCSP</td><td>Light Industrial</td><td>Vacant/ Warehouse</td></tr>
</table>
</td></tr>
<tr><td>Other public agencies whose approval is required</td><td>• Eastern Municipal Water District (EMWD): Approval of water and sewer facilities to serve the Project.
• Riverside County Flood Control and Water Conservation District (RCFC&WCD): Encroachment permit for connection to Line A-B
• Regional Water Quality Control Board: NPDES Permit</td></tr>
<tr><td>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, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?</td><td>Yes. The City's compliance with Assembly Bill (AB 52) is discussed in Threshold 18a(ii) below.</td></tr>
</table>

5.1. AESTHETICS	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, 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) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐

References: GP, GPEIR, IDA, PMC, PVCCSP, PVCCSP EIR

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

- 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 Planting.
- 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.
- 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. The proposed Project site is located within the Perris Valley and the terrain is generally flat. As described in the Perris General Plan 2030 (GP) EIR, virtually all building construction consistent with land use development standards will obstruct views of the foothills from at least some vantage points. (GPEIR, p. VI-2.) However, these view corridors extend for miles along current and planned roadways, preserving scenic vistas from the broad basin to the surrounding foothills.

The proposed Project involves construction and operation of an approximately 324,147-SF warehouse distribution facility (**Figure 7-Proposed Site Plan**), which is consistent with the PVCCSP Light Industrial (LI) land use designation for the site. The proposed Project is also consistent with the land use development standards contained within the Perris GP and the PVCCSP. As the site is not a scenic vista nor will the Project construction block views of a scenic vista, impacts will be less than significant.

1b. **No impact.** According to the Perris GP, no notable stands of native or mature trees exist in the City and no impact is associated with development consistent with the GP. Additionally, the PVCCSP EIR identified no specific scenic resources such as trees, rock outcroppings, or unique features within the Specific Plan area. The closest officially designated State Scenic Highway is Highway 243, located over 20 miles east of the proposed Project site. Therefore, no impacts would occur.

1c. **Less than significant impact.** The US Census Bureau defines urbanized areas as those with a population of 50,000 or more people. According to the US Census Bureau, in 2017 the City of Perris's population was approximately 77,879; this qualifies the City as an urbanized area. Visual character describes the aesthetic setting of a Project area. The PVCCSP minimized future conflicts between the residential uses and their neighboring industrial uses along with striking an appropriate balance between industrial, commercial, and residential uses. Since the proposed Project is in an urbanized area and is consistent with the PVCCSP LI land use designation, the proposed Project is consistent with zoning and the planned character of the area. Additionally, the proposed Project will be designed according to requirements outlined in the PVCCSP to address visual character, including but not limited to: Chapter 4.0, On-site Design Standards and Guidelines; Chapter 6.0, Landscape Standards and Guidelines; Chapter 8.0, Industrial Design Standards and Guidelines.

Current land uses surrounding the proposed Project site include a mixture of warehouse, vacant land and non-conforming residential uses. Therefore, although the proposed Project site will be converted from small business and non-conforming residential structures, to an industrial building, this conversion is consistent with existing and planned surrounding land uses. Thus, impacts to the visual character of the area due to construction of the proposed Project will be less than significant.

1d. **Less than significant impact with mitigation incorporated.** 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 which will be as non-reflective as possible to allow for interior natural light. Most of the windows will be placed on the two office areas (**Figure 8**). The proposed Project will introduce new sources of nighttime light and glare into the area from additional security lighting at the Project site. However, all lighting will be designed pursuant to Perris Municipal Code (PMC) Chapter 19.02.110, 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. The proposed Project will also comply with the lighting requirements in Section 4.2.4 of the PVCCSP, which contains lighting standards for general, decorative, and parking lot lighting.

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 the adjacent residence and motorists on adjacent roadways, such security lights may result in glare to residents and 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**.

> **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 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.

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: FMMP, GPEIR, PVCCSP EIR, RCIT, PMC

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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 proposed Project site is classified as Farmland of Local Importance and Other Land by the Farmland Mapping Management Program (FMMP). Per Section 21060.1 of the *State 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. Thus, no impact will occur.

2b. **No impact.** The City's 1991 General Plan eliminated the agricultural land use designation from within City boundaries. Therefore, there are no agricultural zones identified by the City. Additionally, the proposed Project site is not covered under a Williamson Act Contract. The proposed Project site is zoned PVCCSP with a PVCCSP land use designation of LI. Therefore,

implementation of the proposed Project will not conflict with an existing zoned agricultural use or a Williamson Act Contract. Thus, no impacts would occur.

2c. **No impact.** The Project site is zoned PVCCSP with a PVCCSP land use designation of LI. There are no existing or proposed zoning of forest land, timber land, or Timberland Production Zones within the City. Accordingly, there is no commercial forestry or timber production industry within the City. Therefore, implementation of the proposed Project would have no impact on forestland, timberland, or a Timberland Production Zone. Thus, no impact would occur.

2d. **No impact.** As discussed in *Threshold 2c*, above, there is no land zoned forest land within the City. Further, there are no existing land use designations explicitly for timber production zones or other commercial timber activities within the larger County of Riverside area. 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. Thus, no impact would occur.

2e. **No impact.** As discussed in *Thresholds 2a – 2d* above, the Project site is not categorized as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance nor is the site designated as forest land. There is also no Farmland or forestland in the immediate vicinity of the Project site. Therefore, implementation of the Project will not result in the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use. Thus, no impact would occur.

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) 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?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

References: AQMD, CARB-A, SCAQMD-A, SCAQMD-B, PVCCSP, WEBB-A, WEBB-B, WEBB-E

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

There are no PVCCSP Standards and Guidelines applicable to the analysis of air quality for the proposed Project.

By preparing this Initial Study analysis, the Project has complied with the following applicable PVCCSP EIR 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.

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.

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 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.

Additional PVCCSP EIR mitigation measures that are applicable to the proposed Project are incorporated into the following analysis.

Explanation of Checklist Answers

3a. Less than significant impact. The City of Perris is located within the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) prepares the Air Quality Management Plan (AQMP) for the Basin. The AQMP sets forth a comprehensive program that will lead the Basin into compliance with all federal and state air quality standards. The AQMP's control measures and related emission reduction estimates are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics 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.

The proposed Project site is zoned PVCCSP and has a PVCCSP land use designation of LI. The Project applicant proposes to operate the building as a non-refrigerated warehouse distribution facility which is a permitted use under the LI land use designation. Therefore, this land use and associated air quality emissions would have been accounted for in the SCAQMD's 2016 AQMP.

Population and employment estimates for the City are compiled by the Southern California Association of Governments (SCAG) in their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The proposed Project will increase employment opportunities within the City. The 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 the Perris GP, employment 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. Thus, impacts will be less than significant.

3b. **Less than significant impact with mitigation.** The portion of the Basin within which the proposed Project site is located is designated as a non-attainment area for particulate matter less than 10 microns in diameter (PM-10) under state standards, and for ozone and particulate matter less than 2.5 microns in diameter (PM-2.5) under both state and federal standards (CARB-A). The SCAQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same (SCAQMD-A). Therefore, projects that exceed project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable. Based on SCAQMD's regulatory jurisdiction over regional air quality, it is reasonable to rely on its thresholds to determine whether there is a cumulative air quality impact.

Air quality impacts can be described in a short- and long-term perspective. Short-term impacts occur during site grading 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 occur once the Project is in operation.

Construction Activities

The 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 mph, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph and establishing a permanent, stabilizing ground cover on finished sites. In addition, projects that disturb 50 or more acres or more 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 (approximately 17.7 acres), a Fugitive Dust Control Plan or a Large Operation Notification Form would not be required.

An *Air Quality/Greenhouse Gas Analysis* was prepared for the Project by Albert A. Webb Associates dated July 30, 2020 (WEBB-A). Short-term emissions from Project construction were evaluated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2. The

results of this analysis are summarized in **Table 5.3-A** – **Unmitigated Estimated Maximum Daily Construction Emissions**, below.

Table 5.3-A – Unmitigated Estimated Maximum Daily Construction Emissions

Activity	Peak Daily Emissions (lbs/day)					
	VOC	NO_X	CO	SO_2	PM-10	PM-2.5
SCAQMD Daily Construction Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Demolition-2021	2.12	17.82	20.33	0.03	1.57	1.08
Site Preparation-2021	3.98	40.73	21.85	0.04	**9.31**	**5.81**
Grading-2021	4.29	**46.64**	31.66	0.06	5.61	3.29
Building Construction-2021	3.85	31.28	31.73	0.10	5.50	2.20
Building Construction-2022	**3.53**	28.56	**30.42**	**0.09**	5.33	2.04
Paving-2022	**0.85**	5.76	**7.59**	**0.01**	0.39	0.29
Architectural Coatings-2022	**157.01**	2.04	**4.63**	**0.01**	0.84	0.31
Maximum[1]	**161.39**	**46.64**	**42.64**	**0.11**	**9.31**	**5.81**
Exceeds Threshold?	**Yes**	**No**	**No**	**No**	**No**	**No**

Source: WEBB-A, Table 2 (Appendix A).
Notes: [1]Maximum emissions are the greater of either demolition, site preparation, grading or building construction alone in 2021, or the sum of building construction, paving and architectural coating in 2022 since these activities overlap. Maximum emissions are shown in bold.

As shown in **Table 5.3-A** above, the emissions from construction of the Project are below the SCAQMD daily construction thresholds for all the criteria pollutants, except VOC resulting during the application of architectural coatings (painting). Implementation of mitigation measure **PVCCSP MM Air 9** will reduce VOC emissions associated with architectural coating and as shown in **Table 5.3-B – Mitigated Estimated Maximum Daily Construction Emissions**, below, the mitigated VOC emissions will be reduced to a less than significant level.

Although the remaining construction emissions are below the SCAQMD daily construction thresholds, the Project is required to comply with the following PVCCSP EIR 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 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;
- 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 portions 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/or,
- 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 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 USEPA certified technologies. Diesel equipment shall use water emulsified diesel fuel such as PuriNOx unless it is unavailable in Riverside County at the time of project construction activities.

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

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.

Table 5.3-B – Mitigated Estimated Maximum Daily Construction Emissions

Activity	Peak Daily Emissions (lb/day)					
	VOC	NO_x	CO	SO_2	PM-10	PM-2.5
SCAQMD Daily Construction Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Site Preparation 2021[1]	3.98	40.73	21.85	0.04	**9.31**	**5.81**
Grading-2021	4.29	**46.64**	31.66	0.06	5.61	3.29
Building Construction-2022[1]	**3.53**	28.56	**30.42**	**0.09**	5.33	2.20
Paving-2022[1]	**0.85**	5.76	**7.59**	**0.01**	0.39	0.29
Architectural Coatings-2022	**21.79**	2.04	**4.63**	**0.01**	0.84	0.23
Maximum[2]	**26.17**	**46.64**	**42.64**	**0.11**	**9.31**	**5.81**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: WEBB-A, Table 10 (Appendix A).
Notes: [1]Maximum emissions are from Table 5.3-A.
[2] Maximum emissions are the greater of either demolition, site preparation, grading or building construction alone in 2021, or the sum of building construction, paving and architectural coating in 2022 since these activities overlap. Maximum emissions are shown in bold.

Operational Activities

Long-term operational emissions are evaluated at build-out of a project. The Project is assumed to be operational in 2022. Mobile source emissions refer to on-road motor vehicle emissions generated from the Project's traffic and based on the trip generation provided in the Project-specific *Traffic Impact Analysis* (WEBB-E). Based on input from the City, it was assumed that an average truck trip length was approximately 60 miles. On-site service equipment (i.e., forklifts) are assumed to be neither gasoline nor diesel-fueled (e.g. electric) and therefore would not have any substantive direct emissions of criteria pollutants. Area source emissions from the Project include stationary combustion emissions of natural gas used for space and water heating (shown in a separate row as energy), yard and landscape maintenance, and an average building square footage to be repainted each year. CalEEMod computes area source emissions based upon default factors and land use assumptions. CalEEMod defaults were utilized which include increased efficiency related to the 2016 Title 24 standards. The Project's energy emissions were adjusted to reflect the improvements expected from 2019 Title 24 standards, which became effective January 1, 2020. Separate emissions were computed for both the summer and winter.

Table 5.3-C – Estimated Unmitigated Daily Project Operation Emissions (Summer)

Source	Peak Daily Emissions (lbs/day)					
	VOC	NO_X	CO	SO_2	PM-10	PM-2.5
SCAQMD Daily Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Area	7.44	0.00	0.08	0.00	0.00	0.00
Energy	0.01	0.12	0.10	0.00	0.01	0.01
Mobile	2.00	36.17	30.15	0.24	14.08	3.95
Total	**9.45**	**36.29**	**30.32**	**0.24**	**14.09**	**3.96**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: WEBB-A, Table 3 (Appendix A).
Notes: Emissions reported as zero are rounded and not necessarily equal to zero.

Table 5.3-D – Estimated Unmitigated Daily Project Operation Emissions (Winter)

Source	Peak Daily Emissions (lbs/day)					
	VOC	NO_X	CO	SO_2	PM-10	PM-2.5
SCAQMD Daily Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Area	7.44	0.00	0.08	0.00	0.00	0.00
Energy	0.01	0.12	0.10	0.00	0.01	0.01
Mobile	1.88	36.91	26.13	0.23	14.08	3.95
Total	**9.33**	**37.03**	**26.31**	**0.23**	**14.09**	**3.96**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: WEBB-A, Table 4 (Appendix A).
Notes: Emissions reported as zero are rounded and not necessarily equal to zero

Evaluation of the data presented in **Table 5.3-C** and **Table 5.3-D** above indicates that criteria pollutant emissions from operation of this Project will not exceed the SCAQMD regional daily thresholds for any pollutant during summer or winter. Although these emissions would not

exceed the SCAQMD's thresholds of significance, the proposed Project is required to comply with the following PVCCSP EIR 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 12: Where transport refrigeration units (TRUs) are in use, electrical hookups will be installed at all loading and unloading stalls in order to allow TRUs with electric standby capabilities to use them.

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

As discussed above, after implementation of **PVCCSP MM Air 9**, the Project's construction emissions would not exceed the SCAQMD thresholds of significance. As shown in **Tables 5.3-C** and **Table 5.3-D**, above, the Project's operational emissions would not exceed the applicable SCAQMD thresholds of significance. As such, the Project will not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment and no additional mitigation is required beyond those required by PVCCSP EIR mitigation measures listed above. Therefore, cumulative impacts are less than significant with mitigation.

3c. Less than significant impact with mitigation. For purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities (SCAQMD-B). Staff at the SCAQMD have 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- and long-term). Additional analyses were conducted to evaluate impacts to sensitive receptors regarding Carbon Monoxide (CO) hot spots and health risk from mobile sources.

Localized Significance Threshold (LST)

The construction LST is estimated using the maximum daily disturbed area (in acres) and the distance of the Project site to the nearest sensitive receptors (in meters). The SCAQMD's Fact Sheet for Applying CalEEMod to Localized Significance Thresholds is used to determine the maximum site acreage that is actively disturbed based on the construction equipment fleet and equipment hours as estimated in CalEEMod. Based on this SCAQMD guidance and the Project's equipment list during grading (WEBB-A), the Project will disturb approximately four acres per day. The closest sensitive receptors to the Project construction site are the existing residential adjacent to and east of the Project site fronting Wilson Avenue. The closest receptor distance on the LST look-up tables is 25 meters. According to LST methodology, projects with boundaries closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters. Therefore, a receptor distance of 25 meters (85 feet) was used to ensure a conservative analysis. The results are summarized below in **Table 5.3-E – LST Results for Daily Construction Emissions**, below.

Table 5.3-E – LST Results for Daily Construction Emissions

Pollutant	Peak Daily Emissions (lbs/day)			
	NO_X	CO	PM-10	PM-2.5
LST for 4-acre at 25 meters[1]	**237**	**1,346**	**11**	**7**
Demolition-2021	16.94	19.36	1.25	0.99
Site Preparation-2021	40.50	21.15	**9.09**	**5.75**
Grading-2021	**46.40**	**30.88**	5.37	3.23
Building Construction-2021	18.75	17.67	1.03	0.96
Building Construction-2022	16.77	17.44	0.86	0.81
Paving-2022	5.56	7.29	0.28	0.26
Architectural Coating-2022	1.88	2.42	0.11	0.11
Maximum[2]	**46.40**	**30.88**	**9.09**	**5.75**
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: WEBB-A, Table 5 (Appendix A).
Notes: [1]LST for 4-acre site predicted using Appendix K of SCAQMD LST Methodology.
[2]Maximum emissions are the greater of either demolition, site preparation, grading or building construction alone in 2021, or the sum of building construction, paving and architectural coating in 2022 since these activities overlap. Maximum emissions are shown in bold

As shown in **Table 5.3-E**, emissions from construction of the Project will be below the LST established by the SCAQMD for the Project.

According to the LST methodology, LSTs only apply to the operational phase if a project includes stationary sources or attracts mobile sources that may spend long periods of time idling at the site, such as warehouse/transfer facilities. Therefore, because the proposed Project will operate as a warehouse distribution facility and has the potential to attract mobile sources that can reasonably be assumed to idle at the site, a long-term LST analysis was prepared for this Project. Although the Project site exceeds five acres, per SCAQMD, the LST lookup tables can be used as a screening tool to determine if dispersion modeling would be necessary. Therefore, the Project's on-site emissions from CalEEMod and LST Look-Up Tables for the 5-acre site were utilized as a screening-level analysis.

CalEEMod version 2016.3.2 was utilized to estimate the Project's emissions from trucks traveling on the Project site. An on-site distance of 0.29 miles was conservatively assumed to be traveled for each one of the Project's truck trips identified in the *Traffic Impact Analysis* (WEBB-E). The output is attached to the *Air Quality/Greenhouse Gas Analysis* prepared for this Project (included as Appendix A) and summarized below. Idling emissions from trucks at loading docks is not available in CalEEMod; therefore, PM-10 and PM-2.5 idling emissions were calculated separately to account for 15-minutes of on-site idling per truck per day. The results were added to the total PM-10 and PM-2.5 emissions from CalEEMod and presented in the table below. The closest sensitive receptors to the Project operations are the existing adjacent residential properties fronting on Wilson Avenue, east of the Project site. Therefore, a receptor distance of 25 meters (85 feet) was used to ensure a conservative analysis. The results are summarized in **Table 5.3-F – LST Results for Daily Operational Emissions**, below.

Table 5.3-F – LST Results for Daily Operational Emissions

Pollutant	Peak Daily Emissions (lbs/day)			
	NO_X	CO	PM-10[1]	PM-2.5[1]
LST for 4-acre at 25 meters	**270**	**1,577**	**4**	**2**
On-Site Truck Travel	12.78	2.07	0.07	0.03
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: WEBB-A, Table 6 (Appendix A).
Notes: The greater of summer or winter emissions from CalEEMod is shown.
[1]CalEEMod output emissions added to idling emissions

As indicated in **Table 5.3-F**, Project-related long-term operational emissions will not exceed any SCAQMD operational LST. Additionally, the Project will not generate a CO hot spot. (WEBB-A, pp. 7-8.)

Health Risk Assessment (HRA)

A *Health Risk Assessment* (HRA) was prepared for the Project by Albert A. Webb Associates dated July 30, 2020 (WEBB-B) and included as Appendix B. HRAs are commonly used to estimate the health risks to the surrounding community from projects that significantly increase the number of diesel vehicles and hence increase the amount of diesel particulate matter (DPM) in the area. The correlation between project-specific emissions and potential health impacts is complex and the SCAQMD has determined the attempting to quantify health risks from small projects (such as this) would not be appropriate because it may be misleading and unreliable for various reasons including modeling limitations as well as where in the atmosphere the air pollutants interact and form. (SCAQMD-C, pp.9-15.) Notwithstanding, the analysis herein includes an HRA and a localized impact analysis, discussed above, for the immediate vicinity that is based on the potential to exceed the most stringent ambient air quality standards developed for the most sensitive individuals.

The proposed Project is a single warehouse distribution facility building, which will result in an increase in the number of diesel trucks in the Project vicinity. The estimation of health risks (both cancer and non-cancer) from DPM was performed following the guidelines established by the SCAQMD for health risk assessments from known DPM. Specifically, cancer risks are a calculated probability of the number of people who will develop cancer after exposure to DPM at the same concentration, 24 hours a day, 350 days a year for a lifetime of 70 years.

Twenty-one sensitive receptors and four off-site worker receptors were modeled in the HRA, as shown on **Figure 10 – Discrete Receptor Locations** at the end of Section 5.3. Receptors 1 through 21 are located within the sensitive uses in proximity of the Project site. Receptor 1 through Receptor 6 are residential uses, the closest receptors to the Project site and are located adjacent to and east of the Project site, respectively. Receptor 7 through Receptor 20 are residential uses located along Rider Street and Indian Avenue, west of the Project site. Receptor 21 is located at the Val Verde Elementary School on Indian Avenue, south of Placentia Avenue. Receptor 22 and 23 are non-residential uses east of the Project site along Wilson Avenue and Receptors 24 and 25 are planned industrial uses. It should be noted that Receptors 1 – 7 and 14 – 16 are existing, non-conforming residential uses and/or businesses containing a residential structure that are designated in the PVCCSP for redevelopment with new Light Industrial uses. In fact, the properties of Receptors 1-7 are currently proposed for the development of the Core5 Rider Business Center Project, which is currently undergoing review by the City of Perris.

Similarly, Receptors 9 through Receptor 13, Receptor 17 and 18 are existing, non-conforming residential uses that are designated in the PVCCSP for redevelopment of new Business Professional Office uses.

As shown in **Table 5.3-G – Project-Generated Cancer Risk**, four of the modeled receptor locations are exposed to cancer risks from DPM on the modeled roadways that exceed the SCAQMD threshold of 10 in one million. (WEBB-B, p. 17.) The highest cancer risk at modeled receptor locations is 19.6 per million, located at Receptor 5, the property boundary of a sensitive receptor. The highest cancer risk at modeled off-site worker receptors is 0.2 per million, located at Receptor 25. The reported maximum modeled DPM concentration results in a cancer risk of 1.7 per million and is located within the Project site south of the loading area. (WEBB-B, p.17.) As discussed above, the properties of Receptors 1-7 are currently proposed for the development of the Core5 Rider Business Center Project, which is currently undergoing review by the City of Perris. It is possible that that project will be approved by the City of Perris since it is also consistent with the existing land use and zoning designation for the site and that the existing residential uses at that site will be vacant or gone before the proposed Project is completed and operational.

Table 5.3-G – Project-Generated Cancer Risk

Receptor	Cancer Risk (per million)	
	Unmitigated	Mitigated
Sensitive Receptors		
1	2.6	1.6
2	5.5	3.4
3	13.5	7.0
4	18.7	8.8
5	19.6	9.2
6	19.0	8.7
7	2.5	2.2
8	1.6	1.5
9	1.9	1.9
10	1.8	1.8
11	1.8	1.8
12	1.7	1.7
13	1.8	1.8
14	1.9	1.9
15	2.0	1.9
16	2.0	1.9
17	1.8	1.8
18	1.9	1.9
19	0.3	0.3
20	0.2	0.2
School Child Receptor		
21	0.1	0.1
Off-site Worker Receptors		
22	0.1	*
23	0.1	*
24	0.1	*

Receptor	Cancer Risk (per million)	
	Unmitigated	Mitigated
25	0.2	*

Source: WEBB-B, Tables 4 and 5 (Appendix B). Note: * indicates data not reported

With implementation of **PVCCSP MM Air 11** (see **Table 5.3-G**), none of the modeled sensitive receptor locations are exposed to excess cancer risks from DPM on the modeled roadways that exceed the SCAQMD threshold of 10 in one million. The highest cancer risk at modeled sensitive receptor locations is 9.2 per million, located at Receptor 5, the property boundary of a sensitive receptor. Therefore, the Project's DPM emissions will not result in cancer risks of greater than 10 in one million to the mapped sensitive receptors in the vicinity of the Project site.

> **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.

In terms of non-cancer risks, the Office of Environmental Health Hazard Assessment (OEHHA) has developed acute and chronic reference exposure levels (REL) for determining the non-cancer health impacts of toxic substances. The maximum DPM concentration results in a hazard index of 0.005 which is less than one percent of the allowed threshold of 1.0 (WEBB-B, p. 18).

Based on the discussion above, the Project will not result in localized criteria pollutant impacts during construction or operation, will not generate a CO hot spots, and will not exceed SCAQMD cancer and non-cancer risk thresholds of significance. Therefore, impacts will be less than significant with mitigation.

3d. **Less than significant impact.** The proposed Project presents the potential to result in other emissions, such as those leading to odors in the form of diesel exhaust during construction in the immediate vicinity of the proposed Project site. The closest sensitive receptors to the Project construction site are the existing residential properties on Wilson Avenue, adjacent to and east of the Project Site. However, odors generated during construction will be short-term and will not result in a long-term odorous impact to the surrounding area.

Additionally, the California Air Resources Board (CARB) has developed an Air Quality and Land Use Handbook to outline common sources of odor complaints, including: sewage treatment plants, landfills, recycling facilities, and petroleum refineries (CARB-B). The Project applicant proposes to operate the building as a non-refrigerated warehouse distribution facility, which is not included on the CARB's list of facilities that are known to be prone to generate odors. Therefore, impacts are less than significant.

H:\2019\19-0237\GIS\SensitiveReceptors.mxd; Map created 23 Mar 2021

Sources: Riverside Co. GIS, 2021;
ESRI, 2019.

0 500 1,000 1,500 Feet

Figure 10 - Discrete Receptor Locations

First Industrial Rider

ALBERT A. WEBB ASSOCIATES

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 state or federally protected wetlands (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: BLUE, GP, ORD 1123, PVCCSP EIR, RCA, SKR

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

There are no PVCCSP Standards 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 into the following analysis.

EXPLANATION OF CHECKLIST ANSWERS

4a. Less than significant impact with mitigation. A *Biological Assessment Letter Report for the Rider and Redlands Redevelopment Project, City of Perris,* dated September 25, 2020 (included as Appendix C), was prepared by Blue Consulting Group (BLUE) to document the existing biological resources at the site. BLUE conducted a pedestrian-based biological survey on July 15, 2019 of the Biological Study Area (BSA), which includes the Project site plus a 100-foot

buffer.[1] The BSA is characterized as having existing single-family residential housing, industrial use, agricultural use and disturbed vegetation with generally flat undeveloped terrain that receives frequent weed abatement (i.e. chain flail mowing, disking). The surrounding land use consists of industrial development, disturbed open areas, and residential development. (BLUE, p. 3.) Prior to the pedestrian survey, BLUE conducted a literature review to determine the locations and types of biological resources having the potential to exist within the region. The following sources were reviewed: U.S. Fish and Wildlife Services' (USFWS) Critical Habitat Mapper and File Data; California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB) and the California Native Plant Society (CNPS) database were queried for records of occurrences of special-statues species and habitats within the Perris quadrangle. The MSHCP Transportation and Land Management Agency Geographic Information Services Database and Riverside County Integrated Plan Conservation Summary Report Generator were also reviewed. (BLUE, p. 3)

In addition to utilizing on-line databases and mapping tools, the Perris topographic map was reviewed to determine the locations of any potential special aquatic resource areas (e.g., wetlands or other Waters of the United States or Waters of the State) under regulatory jurisdiction of the US Army Corps of Engineers (USACE), CDFW, and Regional Water Quality Control Board (RWQCB), and Riparian/Riverine habitats prior to beginning field surveys of the BSA. Additionally, the United States Department of Agriculture Natural Resources Conservation Service (USDA-NRCS) on-line Web Soil Survey tool (NRCS 2015) and Figure 2-4 of the MSHCP were reviewed to determine the types and percent cover of soils within the BSA. (BLUE, pp. 3-4.)

The results of the literature review and pedestrian survey indicate that the BSA is actively utilized and maintained, and it contains two vegetation community land cover types: Agricultural/Disturbed is the dominant habitat (8.32 acres) with the balance comprised of Industrial use, Residential Development, and Paved Areas (parking/roads) (Developed habitat) (7.93 acres). No native plant species were located within the BSA.

The plant community of the Agricultural/Disturbed habitat in the BSA is dominated by *erodium spp.* (i.e. red-stem filaree, short-break filaree, and white-stem filaree), tree tobacco *(Nicotiana glauca*), Russian thistle (*Salsola tragus*) and prickly lettuce (*Lactuca serriola)*, which are all non-native species. No herbaceous layer was present in the BSA. (BLUE, p. 5.)

The plant community of the Developed habitat in the BSA consists of mature pepper (*Schinus mole*) and eucalyptus trees (*Eucalyptus spp.*) which are associated with the previous residential uses within the Project site and the BSA. No native vegetation is present within this land cover type. (BLUE, p. 5)

According to the literature review, eleven special-status plant species have been reported to occur within the Perris quadrangle. Three species are designated with federal and/or state listing status; San Jacinto Valley crownscale (*Atriplex coronata var. notatior*), thread-leaved brodiaea (*Brodiaea filifolia*), and spreading navarretia (*Navarretia fossalis*). None of the eleven special-status plant species were present on the Project site and no further survey is necessary to determine presence or absence of those species. (BLUE, p. 6.)

[1] The pedestrian survey was conducted by walking approximately 100-foot wide meandering transects to provide visual coverage of the BSA.

Fifteen special-status wildlife species have been reported to occur within the Perris quadrangle. Three species, Stephens' kangaroo rat (*Dipodomys stephensi*), coastal California gnatcatcher (*Polioptila californica californica*) and least Bell's vireo (*Vireo belli pusillus*) are listed as federally and/or state threatened or endangered. None of the fifteen special-status wildlife species were present on the Project site and n further surveys are necessary to determine presence or absence of these species. (BLUE, pp. 5-6.)

The literature review and field assessment data confirm that no special-status species currently utilize the BSA. The BSA lacks suitable habitat that would typically support special-status species or receive state or federal Endangered Species Act (ESA) protections.

To comply with the Migratory Bird Treaty Act and relevant sections of California Fish and Game Code (e.g., Sections 3503, 3503.4, 3544, 3505, et seq.), vegetation clearing should take place outside of the typical avian nesting season (i.e., February 1st -August 31st), to the maximum extent practical (BLUE, p. 9). If avoidance is not possible, implementation of PVCCSP EIR mitigation measure **PVCCSP MM Bio 1** will require a pre-activity nesting bird field survey and buffer zones that reflect the type of species that is nesting will be established by a qualified biologist.

The BSA is also located within the Western Riverside MSHCP burrowing owl survey area, which requires a pre-construction MSHCP protocol survey for burrowing owl. The burrowing owl is considered a CDFW Species of Special Concern (SSC). BLUE conducted a burrowing owl assessment according to the 2006 Burrowing Owl Survey Instructions for the Western Riverside County Multiple Species Habitat Conservation Plan Area. No suitable habitat for burrowing owl was present within the BSA and no direct observations or burrowing owl signs (feathers, pellets, fecal material, prey remains, etc.) were made during the site assessment. No potentially suitable burrows were present onsite due to extensive disturbances associated with chain flail mowing/disking activities, which can reduce the site's suitability to support small mammal colonies (e.g. ground squirrel) which may provide potentially suitable burrows for burrowing owl. No ground squirrels (an important indicator species) were observed on site. (BLUE, p. 8.) Nonetheless, as required by the MSHCP and PVCCSP EIR mitigation measures **PVCCSP MM Bio 2**, a 30-day pre-construction burrowing owl survey shall be conducted immediately prior to the initiation of construction to confirm that the species is not present at the Project site at that time. Implementation of PVCCSP EIR mitigation measure **PVCCSP MM Bio 2** requiring a pre-construction survey prior to initiation of construction activities to ensure protection for this species. If burrowing owls are detected on-site during the pre-construction survey, the burrowing owls shall be relocated/excluded from the site outside of the breeding season following accepted protocols, and subject to approval of the Regional Conservation Authority (RCA), CDFW, and U.S. Fish and Wildlife Service.

Therefore, with implementation of **PVCCSP MM Bio 1** and **PVCCSP MM Bio 2**, the proposed Project will not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive or special status species. No additional Project-level mitigation measures are required. Thus, impacts will be less than significant with mitigation.

PVCCSP MM Bio 1: In order to avoid violation of the MBTA and the California Fish and Game Code, site-preparation activities (removal of trees and vegetation) for all PVCCSP implementing development and infrastructure projects shall be avoided, to the greatest extent possible, during the nesting season (generally February 1 to August 31) of potentially occurring native and migratory bird species.

If site-preparation activities for an implementing project are proposed during the nesting/breeding season (February 1 to August 31), a pre-activity field survey shall be conducted by a qualified biologist prior to the issuance of grading permits for such project, to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not located within the implementing project site and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.

PVCCSP MM Bio 2: Project-specific habitat assessments and focused surveys for burrowing owls would be conducted for implementing development or infrastructure projects within burrowing owl survey areas. A pre-construction survey for resident burrowing owls would also be conducted by a qualified biologist within 30 days prior to commencement of grading and construction activities within those portions of implementing project sites containing suitable burrowing owl habitat and for those properties within an implementing project site where the biologist could not gain access. If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity would be conducted in accordance with the current Burrowing Owl Instruction for the Western Riverside MSHCP.

If active nests are identified on an implementing project site during the pre-construction survey, the nests shall be avoided or the owls actively or passively relocated. To adequately avoid active nests, no grading or heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31), and 160 feet during the non-breeding season.

If burrowing owls occupy any implementing project site and cannot be avoided, active or passive relocation shall be used to exclude owls from their burrows, as agreed to by the City of Perris Planning Department and the CDFG. Relocation shall be conducted outside the breeding season or once the young are able to leave the nest and fly. Passive relocation is the exclusion of owls from their burrows (outside the breeding season or once the young are able to leave the

nest and fly) by installing one-way doors in burrow entrances. These one-way doors allow the owl to exit the burrow, but not enter it. These doors shall be left in place 48 hours to ensure owls have left the burrow. Artificial burrows shall be provided nearby. The implementing project area shall be monitored daily for one week to confirm owl use of burrows before excavating burrows in the impact area. Burrows shall be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible pipe shall be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow. The CDFG shall be consulted prior to any active relocation to determine acceptable receiving sites available where this species has a greater chance of successful long-term relocation. If avoidance is infeasible, then a DBESP would be required, including associated relocation of burrowing owls. If conservation is not required, then owl relocation would still be required following accepted protocols. Take of active nests would be avoided, so it is strongly recommended that any relocation occur outside of the nesting season.

4b. **Less than significant impact.** No MSHCP riparian/riverine lands which contain habitat dominated by trees, shrubs, persisted emergents, or 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 are present within the BSA and will not be impacted by the Project (BLUE, p. 7). Vernal pools, vernal swales, alkali scalds or flats, or other seasonal wet habitats were not identified within the BSA during field surveys conducted. The BSA lacks suitable habitat for fairy shrimp species or other vernal pool species, including plants. (BLUE, p. 7.) Therefore, the proposed Project will not have a substantial adverse effect on a riparian habitat or other sensitive natural community. Thus, impacts will be less than significant.

4c. **No impact.** The BSA did not contain special aquatic resource areas such as wetlands or other Waters of the United States or Waters of the State under regulatory jurisdiction of the US Army Corps of Engineers (USACE), CDFW, and Regional Water Quality Control Board (RWQCB). (BLUE, p. 7.) As such, no regulatory permits will need to be acquired for the Project. Therefore, no impacts would occur.

4d. **Less than significant impact.** The BSA is not located within any MSHCP designated Criteria Cells or Cell Groups (BLUE, p. 7). The Project site does not fall within in any PQP or other MSHCP Conserved Lands (core, extension of existing core, non-contiguous habitat block, constrained linkage, or linkage area) (BLUE, p. 7). Because the land uses surrounding the Project site consists of industrial development, disturbed open areas, and residential development, the Project site is not located adjacent to extensive native open space habitats and does not represent a wildlife corridor between large open space habitats. Impacts are considered to be less than significant, and no mitigation is required.

4e. **Less than significant impact.** The City of Perris adopted Ordinance No. 1123 to establish a local development mitigation fee for funding the preservation of natural ecosystems in accordance with the MSHCP. The City has also adopted the following General Plan policies for the protection of biological resources (GP Conservation Element, pp. 46-47):

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	For those 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 Multi-Species Habitat Conservation Plan (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 (PVCCSP EIR, 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 is located within the Mead Valley Area Plan area of the Western Riverside MSHCP; however, the Project site is not within a MSHCP Criteria Cell or Conservation Area. The MSHCP is a comprehensive multi-jurisdictional plan that includes western Riverside County and multiple cities, including the City of Perris. Rather than address sensitive species on an individual basis, the MSHCP focuses on the conservation of 146 species, proposing a reserve system of approximately 500,000 acres and a mechanism to fund and implement the reserve system. Most importantly, the MSHCP allows participating entities to issue take permits for listed species so that individual applicants need not seek their own permits from the USFWS and/or CDFW. The MSHCP was adopted on June 17, 2003 by the Riverside County Board of Supervisors. The Incidental Take Permit was issued by both the USFWS and CDFW on June 22, 2004. Because this property is in the City of Perris, the City is the lead agency/permittee.

The MSHCP consists of a Criteria Area that assists in facilitating the process by which individual properties are evaluated for inclusion and subsequent conservation. In addition to Criteria Area requirements, the MSHCP requires consistency with Sections 6.1.2 (Protection of Species within Riparian/Riverine Areas and Vernal Pools), 6.1.3 (Protection of Narrow Endemic Plant Species), 6.1.4 (Urban Wildlands Interface), 6.3.2 (Additional Survey Needs and Procedures), Appendix C (Standard Best Management Practices), and 7.5.3 (Construction Guidelines). The MSHCP serves as a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP), pursuant to Section (a)(1)(B) of the Endangered Species Act (ESA), as well as the Natural Communities Conservation Plan (NCCP) under the State NCCP Act of 2001.

Consistency with MSHCP Section 6.1.1 (Property Owner Initiated Habitat Evaluation and Acquisition Negotiation Strategy (HANS)

The Project site is located within the MSHCP Mead Valley Area Plan but are not located within any MSHCP designated Criteria Areas, group, or linkage area. (BLUE, p. 3.) Therefore, a Habitat Evaluation and Acquisition Negation Strategy (HANS) and Joint Project Review (JPR) will not be required. Further, the Project footprint does not fall within PQP or other MSHCP Conserved Lands. The Project is located approximately two miles west of the San Jacinto Wildlife Area and Lake Perris; both of which are PQP lands. Therefore, the proposed Project is consistent with Section 6.1.1 of the MSHCP.

Consistency with MSHCP Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools)

Volume I, Section 6.1.2 of the MSHCP requires that projects develop avoidance alternatives, if feasible, that would allow for full or partial avoidance of riparian/riverine areas. Section 6.1.2 of the MSHCP defines Riparian/Riverine areas as "lands which contain Habitat dominated by trees, shrubs, persistent emergent, or 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." The Project's BSA does not support riparian, riverine, or vernal pool habitats and no species associated with these habitat types were observed on the Project site. (BLUE, p. 8). As such, no focused surveys are required nor a MSHCP DBESP report. Thus, the proposed Project is consistent with Section 6.1.2 of the MSHCP.

Consistency with MSHCP Section 6.1.3 (Protection of Narrow Endemic Plant Species)

Volume I, Section 6.1.3 of the MSHCP requires that within identified Narrow Endemic Plant Species Survey Areas (NEPSSA), site-specific focused surveys for Narrow Endemic Plants Species will be required for all public and private projects where appropriate soils and habitat are present. The Project site is located within a predetermined survey area for the following MSHCP narrow endemic plant species: San Diego ambrosia, spreading navarretia, California Orcutt grass, and Wright's trichocoronis (RCA). No special status plant species were found onsite and because of the regular ground disturbances occurring onsite due to mowing, etc., the potential for occurrence is none and no further survey is necessary (BLUE, p. 6). Thus, the proposed Project is consistent with MSHCP Section 6.1.3.

Consistency with MSHCP Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlife Interface)

Section 6.1.4 outlines the minimization of indirect effects associated with locating development in proximity to a MSHCP Conservation Area. The Project site is not located adjacent to an existing or proposed MSHCP Conservation Area. (BLUE, p. 3.) Thus, the Project is consistent with Section 6.1.4 of the MSHCP.

Consistency with MSHCP Section 6.3.2 (Additional Survey Needs and Procedures)

The MSHCP requires additional surveys for certain species if a project is located within criteria areas shown on Figure 6-2 (Criteria Area Species Survey Area), Figure 6-3 (Amphibian Species

Survey Areas with Critical Area), Figure 6-4 (Burrowing Owl Survey Areas with Criteria Area) and Figure 6-5 (Mammal Species Survey Areas with Criteria Area) of the MSHCP.

The Project site does not occur within any Amphibian Species Survey Area or Mammal Species Survey Area as identified by the MSHCP. As such, no further surveys related to amphibians, or mammals are required.

The Project site is located within the MSHCP Burrowing Owl, Criteria Area Species, and Narrow Endemic Plant Species Survey Areas. The Criteria Area Species include: San Jacinto Valley crownscale, Parish's brittlescale, Davidson's saltscale, Thread-leaved brodiaea, Round-leaved filaree, Smooth tarplant, Coulter's goldfields, Little mousetail, Mud nama (RCA). The Project's biological assessment determined that no special-status plant species were present onsite and there is no potential for these species to occur on the Project site (BLUE, pp. 6-7).

The results of the burrowing owl habitat assessment conducted for the Project site indicate no suitable habitat for burrowing owl was present within the survey area and no direct observations or burrowing owl sign (feathers, pellets, fecal material, prey remains, etc.) were made during the site assessment. No potentially suitable burrows were present on site due to extensive disturbances associated with chain flail mowing/disking activities, which can reduce the site's suitability to support small mammal colonies. (BLUE, p. 8.)

Regardless, a 30-day burrowing owl pre-construction survey will be required immediately prior to the initiation of construction to confirm that the species is not currently present at the Project site to comply with the applicable laws and to comply with the conservation goals as outlined in the MSHCP. As discussed in *Threshold 4a* above, implementation of PVCCSP EIR mitigation measures **PVCCSP MM Bio 1** and **PVCCSP MM Bio 2** will reduce impacts related to potential MSHCP passerine avian species to less than significant. Thus, with implementation of mitigation, Project implementation is consistent with Section 6.3.2 of the MSHCP.

MSHCP Appendix C (Standard Best Management Practices) and Section 7.5.3 (Construction Guidelines)

The MSHCP lists standard best management practices and guidelines to be implemented during project construction that will minimize potential impacts to sensitive habitats in the vicinity of a project. The guidelines relate to water pollution and erosion control, equipment storage, fueling, and staging, dust control, exotic plant control and timing of construction. The Project applicant is required to implement measures from Appendix C and Section 7.5.3 of the MSHCP. Implementation of PVCCSP EIR mitigation measures **PVCCSP MM Bio 1** and **PVCCSP MM Bio 2** will address potential construction impacts to nesting birds and burrowing owl. Thus, with mitigation the proposed Project is compliant with Appendix C and Section 7.5.3 of the MSHCP.

Additionally, the proposed Project site is within a Stephen's Kangaroo Rat (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. Further, as described in *Threshold 4e* above, the Project applicant will be required to pay applicable MSHCP fees pursuant to Ordinance No. 1123. Therefore, the implementation of the proposed Project will not conflict with the provisions of an adopted conservation plan and impacts will be less than significant with mitigation.

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 pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

References: BFSA-A, PVCCSP EIR, CHSC

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

There are no Standards and Guidelines included in the PVCCSP related to cultural resources. By preparing this Initial Study analysis, 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 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 are also encouraged to 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 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 (3) years prior to the submittal of the application for the subject implementing development project or the start of construction of an implementing infrastructure project.

Additional PVCCSP EIR mitigation measures that are applicable to the proposed Project are incorporated into the following analysis.

EXPLANATION OF CHECKLIST ANSWERS

5a. Less than significant impact with mitigation. A *Phase I Cultural Resources Survey* dated March 2021 was prepared by Brian F. Smith and Associates, Inc. (BFSA-A) and is included as Appendix D of this IS. Prior to conducting the archaeological survey, an archeological records search was conducted at the Eastern Information Center (EIC), at the University of California Riverside, Riverside, CA. The records search included a review of recorded historic properties (prehistoric and historic archaeological sites, historic buildings, structures, objects or districts) within the Project site and a one-mile radius around the Project site, referred to as the Area of Potential Affect (APE), and are on file at the EIC.

According to records search results on file with the EIC, there has been 30 cultural resource studies conducted within a one-mile radius of the Project area. Two of these studies cover a portion of the Project site, however one of the studies was a large overview of resources and it did not directly survey or discuss the current APE, and the second study did not include any specific information on the current Project site. (BFSA-A, p. 30) BFSA conducted a records search, utilizing the information obtained from the EIC. This records search did not identify any resources within the Project site; however, five resources on file with the EIC are located within one mile of the Project site. All of the resources identified during the records search are historic

and consist of the Perris Indian School and Smith-Lowery Farm, farm equipment, the J.B. Mayer Ranch, Quonset huts, and the mapped alignment of the Colorado River Aqueduct. (BFSA-A, p. 30)

BSFA also reviewed additional sources including: the National Register of Historic Places (NRHP) Index, the Office of Historic Preservation (OHP) Archeological Determinations of Eligibility and Directory of Properties in the Historic Property Data File, various topographic maps, and aerial photographs (from 1966 through 2018) and did not identify any potential resources within the Project's study area. Based on the aerial photographs and maps of the area, indicate that most of the structures currently located within the property were constructed after the property was subdivided in the 1970s. Only a single prefabricated structure located within the northeast corner of the property appears on the 1978 aerial; however, it is not present in the previous photograph from 1967. All other buildings at the property do not appear until 1997, the next available aerial photograph. As such, the buildings currently situated within the project are less than 50 years old and do not require any further study or analysis under CEQA. Furthermore, an irrigation or water control feature, consisting of a concrete box, is visible within the northwestern corner of the property on all available aerial photographs, as far back as 1938. (BFSA-A, p. 31)

An intensive reconnaissance survey was conducted. At the time of the survey, the proposed warehouse site was characterized as a flat partially developed project area comprised of five parcels all exhibiting varying degrees of development. Ground visibility was generally poor and limited by dense, non-native weeds and grasses. Disturbances to the property include development, modern prefabricated/modular structures, modern garbage, maintained landscaping and an industrial yard. The survey confirmed that the buildings and associated structures located within the Project site are modern and therefore, not old enough to be evaluated under CEQA as historical resources. (BFSA-A, p. 32)

Although all residences and associated buildings on the property were identified as modern, an isolated small formed-in-place rectangular concrete irrigation/water control feature was identified within the northwest corner of the Project site located at the southwest corner of Rider Street and Redlands Avenue. Historic research has determined that this feature is likely a standpipe tank. A standpipe tank generally refers to any above-ground water storage tank, which is several times larger than it is wide and is used for the distribution of water through a gravity-fed system. The standpipe tank feature identified within the Project site measures approximately five feet by 3.5 feet, is approximately 10 feet tall, and is completely enclosed on all sides; however, aerial photographs indicate that it is open at the top. The feature appears abandoned, is no longer connected to any current water or irrigation systems, and does not contain any valves or remnants of valves; however, it is connected to a two-inch pipe located at the base of the north façade which has been capped. Currently, the standpipe is utilized by property owners for the hanging of advertisements and signs and appears to have been impacted by years of disuse. (BFSA-A, p. 35)

This standpipe tank feature is most likely the feature visible on the 1938 aerial photograph. The feature is identified as "35+40 Conc Box 61' E of ℄ on a 1972 EWMD as-built drawing. Inquiry with the EMWD revealed that their record drawings show the structure connected to a 16-inch irrigation line privately installed by the landowner for farming or ranching. The EMWD stated the feature and any associated pipes are not part of their system and they do not have any additional information pertaining to its use. Additionally, the 1972 as-built drawings show the

feature clearly not connected to any of the current water systems in the area. Therefore, the feature has no association with the Colorado River Aqueduct or any larger EWMD system. (BFSA-A, p. 35)

Based on the archival research, it is likely the feature was constructed sometime between 1916, when improvements on the adjacent property were first assessed, and 1938, when the feature is first visible on the aerial photographs. Given the location and elevation of the feature compared to the surrounding area, it was likely utilized for providing water through a gravity-fed pressure system to lower elevated areas for agricultural or domestic purposes such as the basin/reservoir to the east and/or ranch complex to the southwest also visible on the 1938 aerial photograph. No associated artifacts or other features were present; however, P-33-028896 corresponds with the irrigation/water control feature visible on all historic aerial photographs (1938 through 2019). As such, the feature was recorded on the appropriate 523 series Department of Parks and Recreation forms and submitted to the EIC. (BFSA-A, p. 35)

Based upon the location (elevation benchmark), methods of construction (board-formed concrete), and historic aerial photographs, the standpipe tank recorded as P-33-028896 is a remnant feature of a common twentieth century irrigation/water control system (storage standpipe tank utilized to provide gravity-fed water). Further, as indicated by the historic aerial photographs, the subject property did historically contain any residences, the likely associated ranch complex to the west identified through archival research was demolished in the late twentieth century, and none of the property owners associated with the property during the possible period of manufacture are considered significant. As such, the standpipe tank is a common feature that has been disconnected and isolated from any potentially associated features. Therefore -33-028896 does not qualify as a significant resource eligible for listing on the California Register of Historical Resources but does illustrate the historic use of the property during the twentieth century. (BFSA-A, p. 39)

As concluded by the *Phase I Cultural Resources Survey*, no significant historical resources were identified within the Project site. However, visibility was poor and most of the subject property has been impacted or otherwise disturbed in the past, which typically removes evidence of surface scatters of cultural artifacts. Whether or not any cultural resources beyond Site P-33-028896 (the standpipe tank) have ever existed on the subject property is unclear and the current status of the Project parcels appear to have affected the potential to discover any surface scatters of artifacts. Therefore, due to the presence of the historic standpipe within the Project site, the poor ground visibility during the survey, and previous disturbances, there still remains the potential for resources to be discovered during Project construction activities. Therefore, Project-specific mitigation measure **MM CR 1**[2] shall be implemented to reduce impacts related to historical and archaeological resources to a less than significant level.

> **MM CR 1**: Prior to the issuance of grading permits, the Project proponent/developer shall retain a professional archaeologist meeting the Secretary of the Interior's Professional Standards for Archaeology (U.S. Department of Interior, 2012; Registered Professional Archaeologist preferred). The primary task of the consulting archaeologist shall be to monitor the initial ground-disturbing activities at both the subject site and any off-site Project-related improvement areas for the

[2] Project-specific mitigation measure **MM CR 1** replaces PVCCSP EIR mitigation measures **PVCCSP MM Cultural 2, PVCCSP MM Cultural 3,** and **PVCCSP MM Cultural 4**.

identification of any 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 ground-disturbing 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 monitoring ground-disturbing activities, maintaining daily field notes and a photographic record, and for reporting all finds to the developer and the City of Perris in a timely manner. The archaeologist shall be prepared and equipped to record and salvage cultural resources that may be unearthed during ground-disturbing activities and shall be empowered to temporarily halt or divert ground-disturbing equipment to allow time for the recording and removal of the resources.

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

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

- An agreement that artifacts will be reburied on-site and in an area of permanent protection;
- Reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist;
- Native American artifacts that cannot be avoided or relocated at the Project site shall be prepared for curation at an accredited curation facility in Riverside County that meets federal standards (per 36 CFR Part 79) and available to archaeologists/researchers for further study; and
- The Project archaeologist shall deliver the Native American artifacts, including title, to the identified curation facility within a reasonable amount of time, along with applicable fees for permanent curation.

The Project proponent/developer shall submit a fully executed copy of the agreement to the City of Perris Planning Division to ensure compliance with this condition of approval. Upon verification, the City of Perris Planning Division shall

clear this condition. This agreement shall not modify any condition of approval or mitigation measure.

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

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

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

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

Once grading activities have ceased and/or the archaeologist, in consultation with the designated Luiseño representative, determines that monitoring is no longer warranted, monitoring activities can be discontinued following notification to the City of Perris Planning Division.

A report of findings, including an itemized inventory of artifacts, shall be prepared upon completion of the tasks outlined above. The report shall include all data outlined by the Office of Historic Preservation guidelines, including a conclusion of the significance of all recovered, relocated, and reburied artifacts. A copy of the report shall also be filed with the City of Perris Planning Division, the University of California, Riverside, Eastern Information Center (EIC) and the Luiseño tribe(s) involved with the Project.

5b. **Less than significant impact with mitigation.** As discussed in *Threshold 5a* above, a total of five cultural resources were recorded within one-mile of the Project area; however, they are all historic and none were recorded inside the 16-acre Project site. BFSA requested a records search of the Sacred Lands File (SLF) of the Native American Heritage Commission (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 representatives listed in the NAHC response letter and received four responses. The Cahuilla Band of Indians indicated that, while the Project is outside of the Cahuilla reservation boundary, it does lie within their traditional land use area, and requested to be notified of all updates and/or changes with the Project in the future. The Pechanga Band of Luiseño Indians indicated that the Project lies within a sensitive area between two Traditional Cultural Properties and requested that a Pechanga Tribal monitor be present on-site during earth disturbance associated with the Project. The Soboba Band of Luiseño Indians also indicated that the Project site is located in proximity to known sites and requested that a monitor from the Soboba Band be present during ground disturbing activities. The Augustine Band of Cahuilla Indians stated that they are unaware of any cultural resources that could be impacted by the Project but requested to be informed in the event of any inadvertent discoveries during the development of the Project. (BFSA-A, pp. 31-32.) The Assembly Bill 52 (AB 52) consultation efforts by the City and discussion about the AB 52 consultation is addressed under Section 5.18 – Tribal Cultural Resources of this Initial Study.

An intensive pedestrian survey conducted by BFSA did not identify any significant cultural resources. However, visibility was poor and most of the Project site has been impacted or otherwise disturbed in the past, which typically removes evidence of surface scatters of cultural artifacts. Whether or not any archaeological resources have ever existed on the Project site is unclear and the current status of the Project parcels appear to have affected the potential to discover any surface scatters of artifacts. Therefore, it is recommended that an archaeological monitor be present during future ground disturbances associated with the Project. Project-specific mitigation measure **MM CR 1**, listed in *Threshold 5a* above, shall be implemented to reduce impacts related to archaeological resources to a less than significant level.

5c. **Less than significant impact with mitigation.** The proposed Project site has been historically used for agriculture. No known cemetery has occurred at this site so it is not expected to contain human remains, including those interred outside of formal cemeteries. However, the potential exists for previously unknown human remains to be discovered at the site during Project construction activities. Mitigation measure **MM CR 2**[3] will be implemented to ensure that any human remains that might be discovered at the site are treated appropriately pursuant to Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the California Public Resources Code (CHSC). With adherence to existing laws and regulations, and implementation of mitigation measure **MM CR 2**, impacts with regard to the disturbance of human remains will be less than significant.

> **MM CR 2**: In the event that human remains (or remains that may be human) are discovered at the Project site or within the off-site Project improvement areas during ground-disturbing activities, the construction contractors, Project archaeologist, and/or designated Luiseño tribal representative shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner

[3] Project-specific mitigation measure **MM CR 2** replaces PVCCSP EIR mitigation measure **PVCCSP MM Cultural 6**.

and the City of Perris Planning Division immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).

If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the "Most Likely Descendent" (MLD). Despite the affiliation with any Luiseño tribal representative(s) at the site, the NAHC's identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of Native American human remains and may recommend to the Project proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave goods. The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains will be determined in consultation between the Project proponent and the MLD. In the event that there is disagreement regarding the disposition of the remains, State law will apply and the median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98I and 5097.94(k)).

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

5.6 ENERGY	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☒	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

References: CEC-A, CEC-B, GP, GPEIR, PVCCSP EIR, WEBB-A, WEBB-E

APPLICABLE STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

The Perris GP sets forth objectives and policies to promote minimizing the use of energy and instead generating electricity from renewable resources to ensure plentiful future supply and reducing the negative impacts on the environment. Specifically, the Conservation and Healthy Community Element focus on conserving, among other items, energy resources. The relevant Perris GP goals, policies, and implementation measures, which are intended to conserve energy in the City, are discussed below:

Conservation Element

Goal VIII	Create a vision for energy and resource conservation and the use of green building design for the City which provides for the protection of the environment while improving the quality of life and promoting sustainability.
Policy VIII.A	Adopt and maintain development regulations, which encourage water and resource conservation.
Measure VIII.A.2	Use indigenous and/or drought-resistant planting and efficient irrigation systems with smart controls in all new and refurbished commercial and industrial development projects. Also, restrict use of turf to 25% or less of the landscaped areas.
Measure VIII.A.4	Use gray water, and water-conserving appliances and fixtures within all new commercial and industrial developments.
Policy VIII.C	Adopt and maintain development regulations which encourage increased energy efficiency in buildings, and the design of durable buildings that are efficient and economical to own and operate. Encourage green building development by establishing density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who meet LEED building standards for new and refurbished developments (U.S. Green Building Council's Leadership in Energy and Environmental Design green building programs).
Measure VIII.C.3	Encourage the design and construction of durable buildings that are efficient and economical to own and operate.
Measure VIII.C.4	Review new development projects for compliance with the design guidelines contained within the Sustainable Community section through Conditions of Approval and a finding that the project conforms to the General Plan.
Measure VIII.C.5	Encourage green building density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who meet LEED building standards for new developments.
Goal IX	Encourage project designs that support the use of alternative transportation facilities.
Policy IX.A	Encourage land uses and new development that support alternatives to the single occupant vehicle.
Measure IX.A.1	Encourage installation of shared vehicle parking and support facilities within new and refurbished commercial and industrial developments, i.e., dual fuel vehicles and charging systems on site, car pool parking, and bus stop shelters.
Measure IX.A.2	Install bicycle paths and create secure and accessible bicycle storage for visitors and occupants within new and refurbished commercial and industrial developments.
Measure IX.A.4	Encourage building and site designs that facilitate pedestrian activity, such as locating buildings close to the street and providing direct connections to public walkways and neighboring land uses.

Measure IX.A.5	The City shall require all new public and private development to include bike and walking paths wherever feasible.
Goal X	Encourage improved energy performance standards above and beyond the California Title 24 requirements.
Policy X.A	Establish density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who exceed current Title 24 requirements for new development.
Policy X.B	Encourage the use of trees within project design to lessen energy needs, reduce the urban heat island effect, and improve air quality throughout the region.
Policy X.C	Encourage strategic shape and placement of new structures within new commercial and industrial projects.
Measure X.C.1	Promote energy conservation by taking advantage of natural site features such as natural lighting and ventilation, sunlight, shade and topography during the site plan process.
Measure X.C.2	When possible, locate driveways and parking on the east and north sides of buildings to reduce heat buildup during hot afternoons.

Healthy Community Element

Policy HC 6.1:	Support regional efforts to improve air quality through energy efficient technology, use of alternative fuels, and land use and transportation planning.
Policy HC 6.2:	Support regional water quality efforts that balance water conservation, use of recycled water, and best practices in watershed management.

Implementation and Administrative Process (from Chapter 13.0 of the PVCCSP)

13.3.5 LEED Certification Eligibility

- LEED Certification Eligibility is based on LEED New Construction and the California Green Building Code (part 11 of Title 24). LEED has four levels of certification: Certified, Silver, Gold, and Platinum. The Project proponent must indicate a commitment to reach a particular level of LEED certification prior to project approval. At a minimum, the City will mandate that any new entitlement shall attempt to achieve a "Certified" status. For each level of LEED Certification that the project proponent intends to meet in excess of "certified" status, the City shall reward a corresponding level of incentive.

There are no specific policies related to energy conservation identified within the PVCCSP. However, the PVCCSP EIR includes various mitigation measures to ensure that projects located within the PVCCSP planning area identify air quality impacts from construction and operation and mitigate any potential impacts appropriately. Project-specific and relevant mitigation measures from the PVCCSP EIR which address both potential regional and local air quality impacts are included under Section 5.3 Air Quality, of this study.

EXPLANATION OF CHECKLIST ANSWERS

6a. Less than significant impact with mitigation. The analysis in this section addresses each of the six potential energy impacts identified in Appendix F of the *State* CEQA Guidelines and utilizes the assumptions from the *Air Quality/Greenhouse Gas Analysis* (WEBB-A). Because the California Emissions Estimator Model (CalEEMod) used in this technical report does not display the amount and fuel type for construction-related sources, additional calculations were conducted (WEBB-F) and are summarized below. These calculations are contained in Appendix M of this IS.

Appendix F of the *State CEQA Guidelines* provides for assessing potential impacts that a project could have on energy supplies, focusing on the goal of conserving energy by ensuring that projects use energy wisely and efficiently. Pursuant to impact possibilities listed in *State CEQA Guidelines* Appendix F, an impact with regard to energy consumption and conservation will occur if implementation of the proposed Project will:

- Result in the wasteful, inefficient, or unnecessary consumption of energy. Impacts may include:

    1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal;
    2. The effects of the project on local and regional energy supplies and on requirements for additional capacity;
    3. The effects of the project on peak and base period demands for electricity and other forms of energy;
    4. The degree to which the project complies with existing energy standards;
    5. The effects of the project on energy resources;
    6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

The analysis below addresses each of the six potential energy impacts identified in Appendix F of the CEQA Guidelines

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal.

Construction

Project construction would require the use of construction equipment for grading and building activities, as well as construction workers and vendors traveling to and from the Project site. Construction equipment requires diesel as the fuel source (see **Table 5.6-A – Construction Energy Use)**.

Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix and usage factors provided in the CalEEMod construction output files as part of

the *Air Quality/Greenhouse Gas Analysis* included in Appendix A of this IS. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour included in Table A9-3-E of the SCAQMD CEQA Air Quality Handbook. Fuel consumption from construction worker and vendor/delivery trucks was calculated using the trip rates and distances provided in the CalEEMod construction output files. Total vehicle miles traveled (VMT) was then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor using California Air Resources Board's (CARB-B) EMFAC 2017 model. EMFAC provides the total annual VMT and fuel consumed for each vehicle type. Consistent with CalEEMod, construction worker trips were assumed to include 50 percent light duty gasoline auto and 50 percent light duty gasoline trucks. Construction vendor trucks were assumed to be medium-duty and heavy-duty diesel trucks. Please refer to Appendix M of the IS for detailed calculations.

As shown below in **Table 5.6-A** – **Construction Energy Use**, a total of approximately 59,613 gallons of diesel fuel and approximately 34,693 gallons of gasoline are estimated to be consumed during Project construction.

Table 5.6-A – Construction Energy Use[a]

Fuel	Fuel Consumption
Diesel	
On-Road Construction Trips[b]	20,571 Gallons
Off-Road Construction Equipment[c]	39.043 Gallons
Diesel Total	**59,613 Gallons**
Gasoline	
On-Road Construction Trips[b]	34,693 Gallons
Off-Road Construction Equipment[d]	-- Gallons
Gasoline Total	**34,693 Gallons**

Notes:
[a] Source: Table 1 – Total Construction-Related Fuel Consumption, Appendix M of the IS.
[b] On-road mobile source fuel use based on vehicle miles traveled (VMT) from CalEEMod for construction in 2020 and fleet-average fuel consumption in gallons per mile from EMFAC2017 web based data for Riverside County. See Table 2 – On Road Construction Trip Estimates, Appendix M of the IS for calculation details.
[c] Off-road mobile source fuel usage based on a fuel usage rate of 0.05 gallons of diesel per horsepower (HP)-hour, based on SCAQMD CEQA Air Quality Handbook, Table A9-3E.
[d] All emissions from off-road construction equipment were assumed to be diesel.

Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Construction equipment is also required to comply with regulations limiting idling to five minutes or less (13 CCR § 2449(d)(3)), which is included in PVCCSP EIR mitigation measure **PVCCSP MM Air 4**, as described in Section 5.3 of this IS. Furthermore, there are no unusual Project site characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the State. For comparison, the State of California consumed 15.6 billion gallons of gasoline and 3.1 billion gallons of diesel fuel in 2018, which is the most recent published data.[4] Thus, the fuel usage during Project construction would account for a negligible percent of the existing gasoline and diesel fuel related energy consumption in the State of California. Furthermore, it is expected that construction-related fuel consumption

[4] *California Energy Commission Fuel Data, Facts and Statistics* available at https://www.cdtfa.ca.gov/taxes-and-fees/spftrpts.htm

associated with the Project would not be any more inefficient, wasteful, or unnecessary than at other construction sites in the region.

Operation

The Project will promote building energy efficiency through compliance with energy efficiency standards (Title 24 and CALGreen). The Project proponent has committed to achieve LEED "Certified" status for the building. The Project also reduces vehicle fuel usage due to compliance with regulatory programs and Project design features that reduce VMT. AB 1493 ("the Pavley Standard") requires reduction in greenhouse gas (GHG) emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 and after. Executive Order S-01-07 went into effect in 2010 and requires a reduction in the carbon intensity of transportation fuels used in California by at least 10 percent by 2020. The Executive Order imposes fuel requirements on fuel that will be sold in California that will decrease GHG emissions by reducing the full fuel-cycle and the carbon intensity of the transportation fuel pool in California. The Advanced Clean Cars program, introduced in 2012, combines the control of smog, soot causing pollutants and greenhouse gas emissions into a single coordinated package of requirements for model years 2017 through 2025.

For operational activities, annual electricity and natural gas consumption were calculated using demand factors provided in the CalEEMod output as part of the greenhouse gas analysis included in Section 5.8, Greenhouse Gas Emissions, of this IS. The Project's electrical consumption was estimated to be approximately 917,180 kilowatt-hours (kWh) of electricity per year[5], this is the sum of the building electricity (855,108 kWh/year) and electricity related to the Project's water consumption (62,072 kWh/year). Additionally, the Project's natural gas consumption was estimated to be approximately 463,530 kilo-British thermal units (kBTUs) or approximately 4,635 therms. [6]

In comparison to the Project, Southern California Edison (SCE) one of the nation's largest electric utilities, provides service to the City, including the Project site, as reported by the California Energy Commission (CEC), SCE consumed approximately 83 billion kWh in 2018 (CEC-A). The Southern California Gas Company (SCG) provides natural gas service to the City. As reported by the CEC, SCG consumed approximately 5.2 billion therms in 2018 (CEC-B). At full build-out, the Project site's electricity demand would be a negligible amount of the existing electricity and the natural gas demand would be a negligible percent of the existing natural gas use in SCG's service area.

Energy impacts associated with transportation during operation were also assessed using the traffic data contained in the greenhouse gas analysis included in Section 5.8, Greenhouse Gas Emissions, of this IS. Based on the annual VMT, gasoline and diesel consumption rates were calculated using the Riverside County-specific miles per gallon in EMFAC2017. As shown below in **Table 5.6-B – Annual Fuel Consumption**, a total of approximately 140,414 gallons of gasoline fuel and approximately 232,054 gallons of diesel fuel is estimated to be consumed each year. As stated above, the State of California consumed approximately 15.6 billion gallons of gasoline and 3.1 billion gallons of diesel fuel in 2018. Thus, the annual fuel usage during Project

[5] Per Table 3 – Annual Energy Consumption from Operation, Appendix M of the IS.

operation would account for a negligible percent of the existing gasoline and diesel fuel related energy consumption in California.

Table 5.6-B – Annual Fuel Consumption

Fuel Type[b]	Fuel Consumption (gallons/year)
Gasoline	140,414
Diesel	232,054

Notes:
[a] Source: Table 3 - Annual Energy Consumption from Operation, Appendix M of the IS.
[b] Mobile source fuel use based on annual vehicle miles traveled (VMT) from CalEEMod output (Appendix A) for operational year 2022 and fleet-average fuel consumption in gallons per mile from EMFAC2017 data in Riverside County.

Regulations previously identified related to energy conservation and fuel efficiency include, but are not limited to, Title 24 requirements for windows, roof systems, and electrical systems, and Pavley standards and Advanced Clean Cars Program. Additionally, designing the building to achieve LEED "Certified" status and mitigation measures identified in Section 5.3, Air Quality, also serve to reduce energy and fuel consumption. Specifically, PVCCSP EIR mitigation measures **PVCCSP MM Air 11** and **PVCCSP MM Air 12** reduce fuel usage by limiting truck idling times to five minutes on the site, requiring electrical hook-ups a loading docks, and requiring on-site service equipment such as forklifts to be electric or natural gas powered, respectively. PVCCSP EIR mitigation measures **PVCCSP MM Air 14** and **PVCCSP MM Air 18** also promote the use of efficient transportation choices such as carpool/vanpool and buses.

Collectively, compliance with regulatory programs and implementation of these mitigation measures and design features would ensure that the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy. Therefore, impacts to energy resources during construction or operation will be less than significant and no additional mitigation is required beyond those required by PVCCSP EIR mitigation measures listed above.

2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.

As addressed above, the Project's anticipated electricity consumption is minimal in comparison to SCE's supply. The Project will comply with applicable state, SCE, and Perris GP goals and policies that require energy conservation within the Project site. As discussed above, SCE's total electricity consumption was approximately 83 billion kWh in 2018. The Project demand would be a negligible amount of SCE's existing electricity use. As such, there will be adequate capacity to serve the proposed Project.

As addressed above, the Project's natural gas consumption was estimated to be approximately 4,635 therms per year. The Project will comply with applicable California Public Utilities Commission (CPUC), state, SCG, and Perris GP goals and policies that require energy conservation within the Project area. As discussed above, the Project demand would be a negligible percent of SCG's existing natural gas use. As the proposed Project's overall consumption of natural gas use is comparatively insignificant to existing SCG-wide use and as SCG continuously expands its network, as needed, to meet the need in Southern California,

there will be adequate capacity to serve the proposed Project. The Project would therefore not have a significant effect on local and regional energy supplies.

3. The effects of the project on peak and base period demands for electricity and other forms of energy.

As described above, SCE produced approximately 83 billion kWh in 2018, and the Project is expected to have a negligible impact to SCE's total electricity usage. Therefore, it can be stated that the Project will not have a substantial effect on energy supplies.

The Project will meet Title 24 regulatory standards for windows, roof systems, and electrical systems. The Project will install efficient lighting and lighting control systems. Solar or light-emitting diodes (LEDs) will be installed for outdoor lighting. The site and buildings will be designed to take advantage of daylight, such that use of daylight is an integral part of the lighting systems in buildings. Lighting will incorporate motion sensors that turn them off when not in use. Trees and landscaping will be used to reduce energy use. Light colored "cool' roofs over office area spaces and cool pavements will be installed. With regards to peak hour demands, purveyors of energy resources, including SCE, have established long standing energy conservation programs to encourage consumers to adopt energy conservation habits and reduce energy consumption during peak demand periods. The proposed Project supports these efforts through implementation of **PVCCSP MM Air 19** and **MM Air 20** and Perris GP policies identified above that will not only reduce energy consumption during peak hour demands, but also during the base period. To this end, the Project will not substantially affect peak and base period demands for electricity or other forms of energy, such as natural gas.

4. The degree to which the project complies with existing energy standards.

The proposed Project would be required to comply with City, state and federal energy conservation measures related to construction and operations. Many of the regulations regarding energy efficiency are focused on increasing building efficiency and renewable energy generation, promoting sustainability through energy conservation measures, as well as reducing water consumption and VMT. As described above, the proposed Project will meet and/or exceed these regulatory requirements.

The California Energy Code building energy efficiency standards include provisions applicable to all buildings, residential and non-residential, which are mandatory requirements for efficiency and design. The proposed Project will comply with Title 24. This would be accomplished through, among other things, implementation of energy reduction measures, such as energy efficient lighting and appliances, installation of light colored "cool" roofs over office spaces, installation of cool pavements, and installation of barriers between conditioned and unconditioned spaces. The Project would comply fully with existing energy standards.

In addition, the Project will be consistent with applicable goals and polices within the Perris GP. Through implementation of energy conservation measures and sustainable practices, the Project will not use large amounts of energy in a manner that is wasteful or otherwise inconsistent with adopted plans or policies.

5. The effects of the project on energy resources.

The effects of the Project on energy supplies and resources from a capacity standpoint are described above in the preceding analysis. In regard to the effects of the Project on energy resources, the Project is required to ensure that the Project does not result in the inefficient, unnecessary, or wasteful consumption of energy. Notable regulatory measures that are discussed above include compliance with California Title 24 and CalGreen Standards, Renewable Portfolio Standards (RPS), Pavley standards and the Advanced Clean Cars Program.

Additionally, the PVCCSP EIR mitigation measure **PVCCSP MM Air 20** will reduce electricity consumption.

6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

As stated above, energy impacts associated with transportation during construction and operation of the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy through adherence to existing regulations and Perris GP policies and implementation of design features and mitigation measures. Regarding efficient transportation alternatives, the Project will provide alternative transportation choices because the Project area is near transit agency Riverside Transit Agency (RTA). The nearest bus stop, Route 41, is located on Rider Street approximately 0.5 miles west of the Project site, near the intersection of Perris Boulevard and Rider Street (WEBB-E, p. 11). Additionally, the Project will comply with CalGreen requirements and, pursuant to PVCCSP EIR mitigation measures **PVCCSP MM Trans 5** and **PVCCSP MM Air 14**, provide bike racks, and carpool/vanpool and EV parking stalls.

6b. **Less than significant impact.** The proposed Project would be required to comply with City, state and federal energy conservation measures related to construction and operations, as noted above. Many of the regulations regarding energy efficiency are focused on increasing building efficiency and renewable energy generation, promoting sustainability through energy conservation measures, as well as reducing water consumption and VMT and increasing use of alternative fuels. The California Energy Code building energy efficiency standards include provisions applicable to all buildings, residential and non-residential, which are mandatory requirements for efficiency and design. Further, the proposed Project will comply with Title 24. This would be accomplished through, among other things, implementation of energy reduction measures, such as energy efficient lighting and lighting control systems, appliances, installation of light colored "cool" roofs over office spaces, installation of cool pavements, installation of barriers between conditioned and unconditioned spaces, and providing carpool /vanpool/EV parking stalls.

In addition, the Project will be consistent with applicable goals and polices within the Perris GP and the City's Climate Action Plan and the Perris Community Energy Action Plan (CEAP). The CEAP was adopted in 2014 to improve the energy efficiency of the City. As such through compliance with Perris GP energy objectives and policies noted above, the proposed Project will meet and/or exceed these regulatory requirements. Therefore, impacts to obstructing a state or local plan for renewable energy or energy efficiency during construction or operation will be less than significant.

5.7. GEOLOGY AND SOILS	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
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 direct or indirect 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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

References: AGI, BFSA-B, COR GP, GP, PVCCSP, PVCCSP EIR,

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

There are no PVCCSP Standard and Guidelines applicable to the analysis of geology and soils. By preparing this Initial Study analysis, which includes the *Preliminary Geotechnical Investigation, Rider Street at Redlands Avenue Project,* (included as Appendix E), 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 building pads, and shall describe the methodology (e.g., over excavated, backfilled, compaction) being used to implement the project's design.

EXPLANATION OF CHECKLIST ANSWERS

7a(i). Less than significant impact. Surface rupture presents a primary or direct potential hazard to structures built across an active fault trace**.** According to the *Preliminary Geotechnical Investigation Rider Street at Redlands Avenue Project, City of Perris, Riverside County, California,* dated August 9, 2019, prepared by Aragón Geotechnical Inc. (AGI) (included as Appendix E), the proposed Project site is approximately 8.8 miles from the San Jacinto Fault, the closest known active regional fault. (AGI, p. 14.) AGI's aerial photographic interpretations did not suggest visible lineaments or manifestations of fault topography related to active fault traces on or adjacent to the site; therefore, the potential for direct surface fault rupture affecting the Project is low. (AGI, p. 14.) 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 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.

7a(ii). Less than significant impact. In addition to the San Jacinto fault zone, mentioned above, the San Andreas Fault, approximately 19 miles away, can be considered a potential significant source of lower-frequency and longer–duration shaking at the Project site. (AGI, pp. 14, 17.) However, since ground shaking and earthquake activity is typical of the Southern California area, 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. Therefore, ground-shaking impacts will be less than significant and no mitigation is required.

7a(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. (GP, p. SE-9.) Pursuant to PVCCSP EIR mitigation measure **PVCCSP MM Geo 1**, a Project-specific geotechnical investigation was conducted by AGI to assess soil stability and determine the methodology used to implement the Project's design. The results of this investigation determined that the static groundwater table is considered to have existed at a depth of approximately 37 feet at the time of the study. (AGI, p. 8.) Riverside County classifies the site as "low" to "moderate" liquefaction potential. The site is not within State-delineated "Zones of Required Investigation" for either liquefaction potential or landsliding. Opportunity is present, as evidenced by interpreted perennial perched-water horizons less than 50 feet deep. However, the AGI findings are that the site lacks liquefaction-susceptible materials. (AGI, p. 19.) Therefore, based on the subsurface conditions encountered and the depth of the groundwater at the

Project site, potential impacts due to liquefaction are less than significant. No mitigation is required.

7a(iv). No impact. A combination of geologic conditions leads to landslide vulnerability. These include deep-seated landslides or shallow earth flows, slumps, slides, or rockfall. According to the Project-specific preliminary geotechnical investigation, because the Project site is flat and far from steep or boulder-strewn mountain slopes, earthquake-induced hazards from slope instability or tumbling rocks are believed to be zero. (AIG. p. 20.) Therefore, no impacts will occur. No mitigation is required.

7b. Less than significant impact. Once construction of the proposed Project is complete, most of the Project site will be paved and developed with a warehouse/distribution facility and water quality detention basins; therefore, no soil erosion is anticipated from long-term operation of the Project.

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 National Pollutant Discharge Elimination System (NPDES) general construction permit, which requires that a Storm Water Pollution Prevention Plan (SWPPP) be prepared prior to construction activities and implemented during construction activities. The SWPPP will identify BMPs to be implemented to address soil erosion. Through compliance with these standard regulatory requirements, the construction of the proposed Project is not anticipated to result in substantial soil erosion or the loss of topsoil. Therefore, impacts are less than significant. No mitigation is required.

7c. Less than significant impact. As discussed above in *Threshold 7a(iii)* above, the proposed Project site is located in an area that has been previously determined to have a low potential for liquefaction. (AGI, pp. 19–20.) Likewise, as discussed above in *Threshold 7a(iv)*, landslides do not pose a significant risk at the Project site. (AGI, p. 20.)

Lateral spreading is a phenomenon in which soils move laterally during seismic shaking and is often associated with liquefaction. The amount of movement depends on the soil strength, duration and intensity of seismic shaking, topography, and free face geometry. According to the *Preliminary Geotechnical Investigation*, there is low potential for liquefaction to occur within the Project site and related permanent ground deformation phenomena such as lateral spreading have also been ruled out as hazards (AIG, pp. 19-20). Therefore, impacts would be less than significant.

Seismic ground subsidence (not related to liquefaction induced settlements) occurs when strong earthquake shaking results in the densification of loose to medium density sandy soils above groundwater. The *Preliminary Geotechnical Investigation* report indicates that the bottom subsidence from heavy equipment is predicted to be almost undetectable in the deep cemented soils, but on a site-wide average inclusive of paved areas should fall near 0.1 foot. (AGI, p. 26.) Adherence to the measures identified in the California Building Code, applicable standards of the City's Grading Ordinance, and the recommendations in the *Preliminary Geotechnical Investigation* will reduce impacts resulting from unstable soil conditions to less than significant and no mitigation is required.

7d. Less than significant impact. The *Preliminary Geotechnical Investigation* indicates that the Project as-built pad soils can fall into the expansive soil category and recommends design

parameters for floor slab design to accommodate proposed uses. (AGI, pp. 21-22, 28–30.) The Project applicant will be required to prepare and submit detailed grading plans and building 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 either the *Preliminary Geotechnical Investigation* or a subsequent geotechnical report. Development of the Project site consistent with the recommendations included in the *Preliminary Geotechnical Investigation* (or a subsequent geotechnical report) will reduce potential impacts from expansive soils to a less than significant level and no mitigation is required.

7e. **No impact.** The proposed Project will connect to the existing sewer system and will not require use of a septic tank. There would be no impacts associated with the use of septic tanks or alternative wastewater disposal systems.

7f. **Less than significant impact with mitigation.** A *Paleontological Assessment for The Rider and Redlands Project* dated March 2021 was prepared by Brian F Smith and Associates, Inc. (BFSA-B) (included as Appendix J). The proposed Project site is located on Holocene and upper Pleistocene young alluvial valley deposits to the east, and older, lower Pleistocene very old alluvial fan deposits to the west. Alternatively, mapping shows the entire Project site to be underlain by Holocene alluvium, consisting mostly of sands and clays. The closest recorded fossil localities to the Project site, as reported from the San Bernardino County Museum, are fossil localities from Pleistocene older alluvium near the Lakeview Hot Springs on the southeast side of the Perris Reservoir. Fossil vertebrate collected form these localities included mammoth, extinct horse, and extinct bison. (BFSA-B, p. 5-7.)

According to GP Conservation Element Exhibit CN-7: Paleontological Sensitivity, the Project site is within Paleontological Sensitivity Area 4 (Low to High Sensitivity) and contains young Quaternary alluvium, which has low potential to contain significant fossil resources, overlying older Pleistocene valley deposits. (GP; Conservation Element, pp. 26-27.) Further, the entire site is mapped as High B, according to the County of Riverside. High B indicates that fossils are likely to be encountered at or below four feet of depth, and may be impacted during excavation by construction activities. (BFSA-B, p. 9-11.)

Because of the high paleontological sensitivity assigned to the Project site and in conformance with GP implementation measures IV.A.4 which requires paleontological monitoring of all projects once subsurface excavation reach five feet in depth, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP) shall be prepared and approved, as set forth in Project-specific mitigation measure **MM GEO 1.**[7] Thus, with implementation of mitigation measure **MM GEO 1**, impacts with regard to directly or indirectly destroying a unique paleontological resource or site or unique geologic feature would be reduced to less than significant.

[7] Project-specific mitigation measure **MM GEO 1** replaces PVCCSP EIR mitigation measure **PVCCSP MM Cultural 5**.

MM GEO 1: Prior to the issuance of grading permits, the Project proponent/developer shall submit to and receive approval from the City, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The PRIMMP shall include the provision for a qualified professional paleontologist (or his or her trained paleontological representative) to be on-site for any Project-related excavations that exceed three (3) feet below the pre-grade surface. Selection of the paleontologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the Project site or within the off-site Project improvement areas until the paleontologist has been approved by the City.

Monitoring shall be restricted to undisturbed subsurface areas of older Quaternary alluvium. The approved 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.

5.8. 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: CARB-C, CAP, WEBB-A

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

There are no PVCCSP Standard and Guidelines related to greenhouse gas emissions included in the PVCCSP or its associated PVCCSP EIR.

Explanation of Checklist Answers

8a. **Less than significant impact.** 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 *Air Quality /Greenhouse Gas Analysis* prepared by Albert A. Webb Associates, dated July 2020 (WEBB-A) (included as Appendix A), estimated greenhouse gas (GHG) emissions from construction (inclusive of all road and off-site improvements), area sources, energy, mobile sources, solid waste and water-related energy usage. Evaluation of the data presented in **Table 5.7-A – Total Project-Related Equipment GHG Emissions**, below indicates that the total GHG emissions generated from the Project is approximately 4,270.44 $MTCO_2e$/yr which includes construction-related emissions amortized over a typical project life of 30 years.

Table 5.7-A – Total Project-Related Equipment GHG Emissions

Source	Metric Tons per year (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Amortized Construction	--	--	--	33.11
Area	0.02	0.00	0.00	0.02
Energy	230.87	0.01	0.00	231.98
Mobile	3,923.94	0.14	0.00	3,927.53
Solid Waste	23.50	1.39	0.00	58.23
Water	16.02	0.11	0.00	19.57
Total	**4,194.35**	**1.65**	**0.00**	**4,270.44**

Source: WEBB-A, Table 9 (Appendix A).
Note: Emissions reported as zero are rounded and not necessarily equal to zero.

The total GHG emissions from the Project is below the SCAQMD recommended screening level of 10,000 $MTCO_2e$/yr for industrial projects. Therefore, the proposed Project will not generate GHG emissions, directly or indirectly, that have a significant effect on the environment. Although not considered to be significant, implementation of the applicable air quality mitigation measures **PVCCSP MM Air 2, PVCCSP MM Air 4** through **PVCCSP MM Air 7, PVCCSP MM Air 11** through **PVCCSP MM Air 14, PVCCSP MM Air 18,** and **PVCCSP MM Air 20** from the PVCCSP EIR, as discussed in the Air Quality section of this Initial Study, would further reduce the GHG emissions associated with the proposed Project.

8b. **Less than significant impact.** CEQA allows lead agencies to consider whether regulatory programs are adequate to reduce a project's potentially significant environmental effects. Under Assembly Bill 32 (AB 32), the State's emission inventory must be reduced to 1990 levels by 2020. Most of the reductions required to reach AB 32's 2020 reduction target will be achieved by regulations that apply to both existing and new development, including the Renewable Portfolio Standard (RPS), Pavley standards, Low Carbon Fuel Standards (LCFS), landfill

regulations, regulations and programs on high global warming potential (GWP) gases, initiatives on water conservation (such as SB X7-7), and the indirect influence of the Cap and Trade system on electricity and transportation fuel prices. These regulations are sufficient to achieve AB 32's goal to reduce statewide GHG emissions to 1990 levels by 2020. The CARB 2017 Scoping Plan includes a regulatory strategy that will result in the State achieving the SB 32 target by 2030. (CARB-C.)

Additionally, the City of Perris adopted a Climate Action Plan (CAP) in 2016. The CAP includes local measures that achieve the GHG reduction targets of AB 32 for target year 2020 for the City. Local measures in the CAP include creation of an energy action plan to reduce citywide energy consumption; transportation measures that encourage alternative modes of transportation and reduced vehicle use; and solid waste measures that reduce landfilled solid waste in the City

The Project would comply with the CAP through compliance with the PVCCSP EIR mitigation measures identified previously in Section 5.3 of this Initial Study, which would lessen the Project's contribution of GHG emissions from both construction and operation. The Project would not conflict with local strategies and state/regional strategies listed in the Perris CAP.As described in *Threshold 8a* above, the proposed Project will not generate a significant amount of GHG emissions. Therefore, the proposed Project does not conflict with and would not obstruct implementation any regulation adopted for the purpose of reducing the GHG emissions and any impacts are considered less than significant.

5.9. 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?	☐	☐	☒	☐

5.9. HAZARDS/HAZARDOUS MATERIALS	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would 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 result in a safety hazard or excessive noise or people residing or working in the project area?	☐	☒	☐	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

References: AEC, ALUC, CEPA, CCR, PVCCSP EIR, PVCCSP, PVCCSP IS

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

The PVCCSP includes Standards and Guidelines relevant to development within the Airport Influence Zones I and II. The 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 the 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 into the following analysis.

EXPLANATION OF CHECKLIST ANSWERS

9a. **Less than significant impact.** According to the PVCCSP EIR, all new development within the PVCCSP area will be required to comply with the regulations, standards, and guidelines established by the Environmental Protection Agency (EPA), 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. (PVCCSP EIR, p. 4.6-11.)

The portion of the proposed Project site that will be developed with the warehouse/distribution facility has a PVCCSP land use designation of Light Industrial, which allows for assembly of non-hazardous products and materials. Because the exact tenants of the proposed 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 from the proposed facility. However, these hazardous materials would not be manufactured at the Project site 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 (DOT) 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 (CCR), 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 and state laws related to the transportation, use, storage and response to upsets or accidents that may involve hazardous materials would reduce the likelihood and severity of upsets and accidents during transit and storage, it is not expected to result in the use of large amounts of hazardous materials that would create a hazard to the public or environment. Therefore, impacts are less than significant.

9b. **Less than significant impact.** The *Phase 1 Environmental Site Assessment, 475 East Rider Street and 3055, 3085, and 3125 Redlands Avenue Perris, California 92571,* dated July 24, 2019 (hereinafter the *Phase I ESA*) was prepared for the Project site by Advantage Environmental Consultants, LLC (AEC) and is included as Appendix F of this IS. The *Phase I ESA* was prepared in accordance with the ASTM E 1527-13 Standard Practice for environmental site assessments (ESAs) to evaluate the Project site for potential recognized environmental conditions. The *Phase 1 ESA* noted that the Project site was previously used for agricultural purposes dating back to at least 1938. Select areas on the northwestern and southeastern portions of the Project site appear to have also had intermittent agricultural activity after development through at least

2012.Various pesticides, and more specifically organochlorine pesticides were commonly applied during the normal course of agricultural operations of the time. (AEC, p. 1.) A site reconnaissance was conducted by AEC on July 2, 2019. The Phase I ESA notes that the Project site is currently developed with several prefabricated/modular structures used for residential, commercial, and religious purposes. (AEC, p. 17.) No stressed vegetation or evidence of pesticide storage was observed at the Project site during the site reconnaissance or based on regulatory and historical research reviews. (AEC p. 15.)

A review of the Federal, State and local environmental databases was conducted as part of the *Phase I ESA* for information pertaining to documented and/or suspected releases of regulated hazardous substances and/or petroleum products of nearby off-sites. AEC also reviewed unmappable sites listed in the environmental database report by cross-referencing addresses and site names. AEC identified three off-sites within one mile of the Project site. These three off-sites were not considered recognized environmental condition to the Project site due to the nature of the regulatory database listings, distance of the off-site listed properties from the Project site, orientation of the listed properties relative to the Project site, interpreted direction of groundwater flow and/or regulatory case status information for the various properties as described in their respective databases (AEC, pp.10-11). As such, based on AEC's review of historical uses at the Project site, the Project site is not considered a recognized environmental condition. (AEC p. 15.) Therefore, ground disturbance during Project construction is not anticipated to create a significant hazard to the public or environment.

As discussed in *Threshold 9a* 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 has been screened for any hazardous waste-related activities at the Project site, and since any hazardous waste-related activities for any future users at the Project site will be required to comply with all existing hazardous waste regulations, impacts would be less than significant and no mitigation is required.

9c. **No impact.** The proposed Project site is not located within one-quarter mile of an existing or proposed school. The closest school is Triple Crown Elementary School which is approximately 0.76 miles south of the proposed Project site. Thus, the proposed Project will not emit hazardous emissions or handling hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, no impacts are anticipated.

9d. **Less than significant impact.** According to the California Environmental Protection Agency's (CEPA) Cortese list, compiled pursuant to Government Code Section 65962.5, no hazardous materials sites are located at or adjacent to the Project site. The environmental database resources consulted as part of the *Phase I ESA* identified three potential listings within one-quarter mile to one mile of the Project site: Perris West End Middle School, Triple Crown Elementary School and Morgan Street Elementary School. The Perris West End Middle School is listed as an inactive/withdrawn school investigation for soil from 2007 and the elementary school listings are related to school investigations conducted in 2005 and 2006 and have a current status of "no further action." (AEC, pp. 10-11.)

The *Phase I ESA* concluded that the above listings were not considered to be significant environmental concerns to the Project site. This conclusion is based on several factors including the nature of the regulatory database listings, distance of the listed facilities site from the Project site, orientation of the listed facilities relative to the Project site, interpreted direction of groundwater flow and/or regulatory case status information for the various facilities/properties as described in the databases. (AEC, pp. 10-11.) Based on the above discussion, impacts with regard to posing a significant hazard to the public or the environment due to being located on a hazardous materials site are considered to be less than significant and no mitigation is required.

9e. Less than significant impact with mitigation. The proposed Project site is located approximately 2.5 miles southeast of the March Air Reserve Base/Inland Port Airport (MARB/IPA) and is within the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP) area. The MARB/IPA LUCP divides the area close to the airport into zones based on proximity to the airport and perceived risks. The MARB/IPA LUCP indicates the allowable uses, potential noise impacts, potential safety impacts, and density/intensity restrictions for each zone. As previously illustrated in **Figure 6**, the proposed Project site is within two zones, Zone C1 and Zone B2, and the Project is not required to go through Airport Land Use Commission (ALUC) review and consistency determination because: 1) 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 MARB/IPA LUCP,[8] and 2) there is no legislative action (i.e., general plan amendment, specific plan amendment, or change of zone) required or proposed.

The City's noise compatibility standards in the Perris Municipal Code Section 19.51.080, prevents the establishment of noise-sensitive land uses such as new residences, schools, libraries, museums, hotels, motels, hospitals, nursing homes, places of worship, in portions of the airport environ that are exposed to significant levels of aircraft noise. The proposed Project site is within the 60-65 CNEL aircraft noise contour. (ENTECH, p. 19.) Since the proposed Project use is not a noise-sensitive land use, the proposed Project would not expose people working in the Project area to excessive noise levels from airport operations.

According to the MARB/IPA Basic Compatibility Criteria, Zone B2 and Zone C1, in the primary approach/departure zone has a density requirement of an average of 100 people/acre or 250 people/single acre and has no open land requirements. The entirety of the proposed Project site (14.85 net acres) lies within Zone B2 and C1, which includes approximately 316,147 square feet of warehouse use and approximately 8,000 square feet of office use (or 7.4 acres). The following analyzes how the proposed Project complies with the density/intensity requirements of the MARB/IPA ALUCP.

Pursuant to the *Airport Land Use Compatibility Plan Policy Document – Appendix C – Methods for Determining Concentrations of People*, the following usage intensity parameters were used to calculate the occupancy for the proposed Project:

- Warehouse – 35% of the usage intensity from 1 person/500 square feet,[9]

[8] On July 14, 2016, The Riverside County Airport Land Use Commission determined that the City's Airport Overlay Zone is consistent with the current MARB/IPA ALUCP.

[9] 2.4(f)(1) of the MARRB/IPA ALUCP states that 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.

- Office – 50% of the usage intensity from 1/person/100 square feet,[10]

Based on the above usage intensity parameters, the warehouse and office portions of the building in Zones B2 and C1 will be occupied by a total of 262 people.[11] As noted above, these Zones allows an average of 100 people per acre; therefore, based on the approximately 14.85 net acre Project site, the Project would have an average of 36 people per acre in Zone B2 and C1.[12]

Another measurement required by the MARB/IPA ALUCP, is a single-acre intensity limit. For Compatibility Zone B2 and C1, the MARP/IPA ALUCP limits the maximum single-acre intensity to 250 people per acre. In order to determine if the Project fits within the 250 people per single acre limit, it was assumed in a worst case calculation that in a single-acre (43,560 square feet), all the total office space (8,000 square feet of office) is within the single-acre and the remainder of the acre is warehouse (35,560 square feet of warehouse). This would equate to a total occupancy of 65 people (8,000 square feet of office / 100 square x 50% usage intensity plus 35,560 square feet of warehouse / 500 square feet x 35% usage intensity), which is consistent with the Compatibility Zone B2 and C1 single-acre intensity criterion of 250. Thus, the proposed Project would comply with the MARB/IPA ALUCP density requirements.

According to Exhibit MA-5 in the *Background Data: March Air Reserve Base / Inland Port Airport and Environs,* the Project site is within the FAR Part 77 Military Outer Horizontal Surface Limits; therefore, an obstruction evaluation is required and is implemented by **PVCCSP MM Haz 6**.

Both Zone B2 and C1 hazards to flight include physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations are prohibited. According to the Perris Municipal Code Chapter 19.51 March ARB/IP Airport Overlay Zone, the proposed Project will not be required to obtain ALUCs approval, since the Project will comply with the airport influence area requirements.

Although impacts associated with aircraft activities would be less than significant, the proposed Project is required to comply with the following mitigation measures identified in the PVCCSP EIR, **PVCCSP MM Haz 2** through **PVCCSP MM Haz 6**, to reduce impacts associated with MARB/IPA operations. Therefore, the proposed Project will not result in a safety hazard to people working in the Project area and impacts will be less than significant with mitigation:

> **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.

[10] 2.4(f)(3) of the MARRB/IPA ALUCP states that offices within high-cube warehouses, distribution centers, and commerce centers and fulfillment centers, shall be evaluated on the basis of 50% of the usage intensity that results from the occupancy level indicated in Table C1.

[11] Based on the rates noted above for warehouse and office uses, approximately 316,147 square feet of warehouse space would equate to 222 people (316,147 square feet/500 square feet/person x 35% usage intensity) and approximately 8,000 square feet of office space would equate to 40 people (8,000 square feet/100 square fee/person x 50% usage intensity) within the Project site in Zone B2 and C1.

[12] 262 people/7.35 acres within Zone C1 = 36 people/acre in Zone B2 and C1

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.

9f. **Less than significant impact.** The City of Perris participates in the *County of Riverside Multi-Jurisdictional Local Hazard Mitigation Plan* (LHMP) which outlines requirements for emergency access and standards for emergency responses. The PVCCSP IS determined that because emergency access will be maintained and improved throughout the PVCCSP area in accordance with the LHMP, development within the PVCCSP area will not interfere with adopted emergency response plans. (PVCCSP IS, p 15.)

Once the Project is constructed, emergency access to the Project site will be maintained via the driveways on Redlands Avenue and Rider Street, consistent with requirements outlined in the LHMP. 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.

9g. **No impact.** Pursuant to the findings of the PVCCSP IS, the proposed Project site is not adjacent to any wildlands or undeveloped hillsides where wildland fires might be expected; further, the Perris GP does not designate this area to be at risk from wildland fires. (PVCCSP IS, p. 15.) Moreover, the Project proposes to develop the current vacant lot with a warehouse and associated parking, which would not likely aid the spread of wildfire. Therefore, no direct or indirect impacts due to wildland fire would occur.

5.10. 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 or otherwise substantially degrade surface or ground water quality?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin)?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces in a manner which would:				
(i) result in substantial erosion or siltation onsite or offsite;	☐	☐	☒	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐

5.10. HYDROLOGY AND WATER QUALITY	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

References: DWR, FEMA, GPEIR, PVCCSP EIR, SWRCB, WEBB-C, WEBB-D

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

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 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 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, Low Impact Design (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

10a. Less than significant impact with mitigation. The Santa Ana Regional Water Quality Control Board (SARWQCB) sets water quality standards for all ground and surface waters within the Santa Ana River Watershed, which includes the City of Perris. Water quality standards are defined under the federal Clean Water Act (CWA) 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 is located within the Santa Ana River Watershed and San Jacinto River Sub-Watershed, and within the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB). Runoff from the PVCCSP area discharges into the PVSDC, which is tributary to the San Jacinto River, Canyon Lake, and Lake Elsinore. Canyon Lake is currently listed as an impaired waterbody on the CWA Section 303(d) List because it exceeds water quality objectives for nutrients and pathogens. Lake Elsinore is listed as an impaired waterbody

due to nutrients, organic enrichment/low dissolved oxygen, PCBs, sediment toxicity, and unknown toxicity.

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 sediment off-site which could impact downstream water quality. To address this, the Project developer is required to obtain coverage under the statewide Construction General 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. Compliance with this permit requires the applicant to prepare an effective SWPPP, which will reduce potential construction-related water quality impacts to a less than significant level.

Development of the proposed Project would add impervious surfaces to the site through the warehouse building and 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.

According to the *Preliminary Project-Specific Water Quality Management Plan* (WQMP), revised September 2020, prepared by Albert A. Webb Associates (WEBB-D) and included as Appendix H to this IS, impervious area was minimized given the proposed site usage, required materials, and the landscaping pervious cover. Once constructed, the proposed Project site will include approximately 69,712 square feet of landscaping, which constitutes approximately 11 percent of the total Project site (14.9 acres), which meets the City's 10 percent landscaping requirement. Typical pollutants from commercial/industrial sites include bacteria, metals, nutrients, sediment, trash, oil/grease, toxic organics, and pesticides (WEBB-D, p. 19). Therefore, the methods of stormwater treatment used onsite should target these pollutants, which includes the method of bioretention.

The Project site is within the Perris Valley Master Drainage Plan (MDP) area and 10 acres of the Project site is planned to discharge into MDP Line A-B, and 5 acres of the Project is planned to discharge in MDP Line A-C, which does not currently exist. However, the proposed RCTC Mid County Parkway (MCP) – currently completing construction package one - runs directly through the future Line A-C alignment and surrounding tributary areas. Because of this, the Project proposes that the Line A-C tributary areas impacted by MCP will be redirected to Line A-B. The revised tributary areas allow the entire Project to discharge into Line A-B (WEBB-D, pp. 6-7).

In addition, according to *Preliminary Drainage Study,* revised April 2020, prepared by Albert A. Webb Associates (WEBB-C) and included as Appendix G to this IS, on-site flows generated by the proposed Project will surface flow through the Project site utilizing curb and gutter and will require minimal subsurface storm drains. The site is within an area that is deemed exempt by the RWQCB from considering Hydrologic Conditions of Concern (HCOC), therefore stormwater treatment methods are sized to handle and treat just the water quality design volume. Water quality volume will be treated through engineered media, and larger flows (e.g. 100-Year storm event) will bypass through grates at outlet structures located at all bioretention facilities. Runoff

from the westerly half of the site will flow into bioretention basins "A" and "B". The parking area to the north of the building will discharge into water quality basin "C" along Rider Street. The remainder of the site will drain to the easterly truck court area and directed into proposed underground storage chambers located at the northeast corner of the truck court parking stalls. The water quality volume will be stored in the chambers and pumped into a proprietary device ("Contech Filterra Unit") for treatment. All flows greater than the water quality volume will flow out of the chambers and gravity flow to Line A-B. The proposed outlet structures will discharge all flows including that in excess of the water quality volume into the proposed storm drain Line A, which will connect to the existing MDP Line A-B, which ultimately outlets to the PVSDC. (WEBB-C, pp. 1-2).

Pursuant to PVCCSP EIR mitigation measure **PVCCSP MM Haz 5** (see *Threshold 5.9e*, above), all retention and water quality basins on the Project have been designed to drawdown within 48 hours of a rainfall event. The underground chambers and Contech Filterra Unit will dewater in 24 hours. The Preliminary WQMP and Drainage Study have been submitted to the City Public Works Department for review. Prior to issuance of a grading permit, a final WQMP and Drainage Study will be required for the Project.

The proposed Project will also 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 incorporates site design, source control and treatment control BMPs to address storm water runoff generated onsite. Thus, through BMPs combined with compliance with existing regulations, the proposed Project will not violate water quality standards, waste discharge requirements, or otherwise degrade surface or ground water quality. Therefore, impacts are less than significant.

10b. Less than significant impact. The proposed Project site overlies the bounds of the San Jacinto Groundwater Basin 8-005 and the Perris North Groundwater Management Zone (GMZ). The Eastern Municipal Water District (EMWD) manages groundwater resources in this area by implementing the *West San Jacinto Groundwater Management Plan.* In addition, the EMWD has led the development of a Groundwater Sustainability Agency (GSA) that will prepare a Groundwater Sustainability Plan (GSP) by 2022 pursuant to the Sustainable Groundwater Management Act of 2014 (SGMA).

As described in the Project WQMP, infiltration tests were conducted onsite in the northeast and southeast corners of the site. Results indicate that onsite soils have very poor rates of infiltration (WEBB-D, p 9); therefore, the Project site would not be expected to contribute significantly to the underlying groundwater basin. While the proposed Project will increase the amount of impervious surfaces in the area, the impervious area on the Project site was minimized given the proposed site usage and required materials. Pursuant to the Perris Municipal Code, the minimum landscaping pervious cover of 10 percent was achieved. Due to the proposed Project's small size in relationship to the total size of the groundwater basin and implementation of BMPs as described in *Threshold 10a* above, there will not be a substantial effect upon sustainable groundwater management of the basin. Further, the Project is a part of the PVCCSP, for which the EMWD prepared a Water Supply Assessment (WSA) pursuant to SB 610. The WSA

determined that EMWD has sufficient water supplies to meet the future demand from buildout of the PVCCSP and that the Project site's land use type has been accounted for in the water supply and water demand projections in EMWD's Urban Water Management Plan (UWMP) (see further discussion in Section 5.19 Utilities and Service Systems). Therefore, the Project will not substantially decrease groundwater supplies, and impacts will be less than significant.

10c(i). Less than significant impact. According to the Project Preliminary WQMP, there are no streams or rivers currently mapped at the Project site, and the Project site is not impacted by off-site flows (WEBB-D, p. 7). Further, the Project site is relatively flat and currently slopes at approximately 0.50 percent to the east. (WEBB-D, p. 6). The existing drainage pattern for the site and the general area is characterized by sheet flows across the site from west to east towards Rider Street and ultimately to the PVSDC. Development of the proposed Project will maintain the existing drainage pattern by conveying runoff utilizing curb and gutter, onsite subsurface storm drains, offsite regional storm drains, which connect to the PVSDC. (WEBB-C, p. 1-1.) Because the drainage pattern is not adversely impacted and water quality treatment mechanisms are being included in the Project, substantial erosion or siltation on- or offsite are not anticipated.

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.

10c (ii). Less than significant impact. According to the Project Drainage Study, the rational method was used to determine peak flow rates (i.e. 10-Year and 100-Year storm events) in order to adequately size the proposed subsurface storm drain conveying flow through the site and into existing Line A-B (WEBB-C, p. 2-1). The outlet structures to the bioretention basins and Line A onsite storm drain line have all been sized according to the 100-Year peak flow rates. Further, Line A-B has excess capacity that can handle all of the flood flows from the Project site. Therefore, the analysis in the Project Drainage Study shows the proposed Project will not cause flooding on- or off-site. 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. Impacts will be less than significant.

10c (iii). Less than significant impact. As described in the response to *Threshold 10a*, according to the Perris Valley MDP, the Project site is split between draining to MDP Line A-B and Line A-C, which does not yet exist. Albert A. Webb Associates submitted to the City of Perris and Riverside County Flood Control District a Technical Memorandum, *Perris Valley MDP: Line A-B and Line A-C Tributary Watershed Modification* dated Feb. 12, 2020, which is located in Appendix C of the Drainage Study (WEBB-C) to document how redirecting all Project flows into Line A-B will not impact the existing design of Line A-B or the design flow rate of the PVSDC. The City of Perris issued a response dated April 8, 2020 that is also located in Appendix C of the Drainage Study, which states the City agrees in concept that "the revisions to the Perris Valley MDP lines do not exceed the existing capacities and appear to satisfactorily account for the upcoming Mid-County Parkway…this memorandum can be used for the initial design of affected developments within the drainage study boundaries."

Additional sources of polluted runoff are not anticipated because all runoff generated by the Project up to and including the water quality design volume will be treated through effective

means of bioretention. Bioretention is one of the accepted Low Impact Development (LID) methods that provides high rates of pollutant removal according to the WQMP Guidance Document. As explained in *Threshold 10a*, because the Project is exempt from HCOC it is required to treat only up to the water quality design volume. Flows in excess of that volume will bypass treatment.

Because of the agreed-upon documentation provided in said technical memorandum that the Project will not adversely impact downstream infrastructure, and approval by the City of a Project Drainage Study, the proposed Project will not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff. Therefore, impacts related to the Project's runoff will be less than significant.

10c (iv). Less than significant impact. As shown on Federal Emergency Management Agency (FEMA) Panel No.06065C1430H, approximately half of the proposed Project site is located within Zone X, which is a flood area with a 0.2 percent annual chance of floods; area of one percent annual chance flood with average depths of less than one foot or with drainage areas less than one square mile; and areas protected by levees from one percent annual chance flood. According to the *Preliminary Drainage Study*, the proposed Project's drainage improvements will adequately convey flows to the basins and provide flood protection for the 100-year storm event (WEBB-C, p. 4-1). Thus, the proposed Project will not impede or redirect flood flows and impacts are less than significant.

10d. Less than significant impact. According to the Perris GP EIR (GPEIR) Exhibit 4.5-12, the proposed Project site is within the Dam Inundation Area for the Lake Perris Dam. Projected water flows from failure of the Perris Dam are based on a scenario in which a full reservoir completely empties and does not account for run-off from other sources (GPEIR, p. 26). The California Department of Water Resources (DWR) identified potential seismic safety risks in a section of the foundation of the Perris Dam. In April 2018, DWR completed a major retrofit to Perris Dam in Riverside County as part of a statewide effort to reduce seismic risks to dams. Upgrades to the 130-foot tall, earthen dam included strengthening roughly 800,000 cubic yards of foundation material by mixing cement with soil and reinforcing it with a 1.4 million-cubic-yard earthen stability berm placed on the downstream side of the dam. The dam upgrades were designed to withstand a magnitude 7.5 earthquake. (DWR 2018.) For these reasons, impacts related to the release of pollutants due to inundation are considered less than significant.

10e. Less than significant impact. Substantial regulation currently exists that addresses stormwater runoff and keeping non-stormwater pollutants out of receiving waters, including the statewide construction general permit (CGP) (i.e. SWPPP) and the Municipal Separate Storm Water Sewer System (MS4) Permit (i.e. WQMP). The Project will be conditioned to comply with these regulations as described in Threshold 10a above. Through compliance with said regulations, the Project will be consistent with the SARWQCB Water Quality Control Plan (Basin Plan). Because the Project is a planned component of an approved Specific Plan, underlain by soils with poor infiltration, and it will be accounted for in the forthcoming GSP, the Project will not conflict with or obstruct a sustainable groundwater management plan. Thus, in regard to conflicting or obstructing a water quality control plan, or sustainable groundwater management plan, impacts will be less than significant.

5.11. 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) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

References: ALUC, GP, PVCCSP

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

11a. **No impact.** The proposed Project site is partially developed with commercial and residential land uses and bordered by vacant lots to the north and south, nonconforming residential uses to the east, industrial warehouse to the northwest and west. The planned land uses in the vicinity of the proposed Project site have PVCCSP land use designations of Light Industrial. 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. (PVCCSP, pp. 1.0-1–1.0-2.) Therefore, the proposed Project is consistent with the surrounding land uses and no impacts would occur with regard to the division of an established community.

11b. **Less than significant impact.** The proposed Project site is located within the City and within the PVCCSP area. Thus, land use is guided by both the Perris GP and the PVCCSP. The proposed Project includes a warehouse/distribution facility, which is consistent with the PVCCSP Light Industrial (LI) land use designations. As evaluated in **Table 5.11-A – General Plan Consistency**, (commencing on the following page) the proposed Project is also consistent with all applicable policies from the Perris GP that were adopted to avoid or mitigate environmental effects of new development projects.

Since the proposed Project's planned use is consistent with the Perris GP, the proposed Project is also consistent with the Southern California Associated Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) as discussed in *Threshold 3a* above. The proposed Project site also lies within multiple zones of the Riverside County Airport Land Use Commissions (ALUC) March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP), including Zones B2 and C1. As discussed in *Threshold 8e* above, the proposed Project is consistent with the 2014 MARB/IPA LUCP.

Table 5.11-A – General Plan Consistency

Policy No.	Policy	Statement of Consistency
Circulation Element		
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 the frontage of Rider Street and Redlands Avenue. 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 Perris GP Policy I.B.
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 (2022) traffic conditions. Additionally, the Project will be responsible for constructing sidewalk improvements on Project's frontage on Rider Street and Redlands Avenue. Further, installation of sidewalks and bike racks at the Project site will support development of alternative travel modes and the Project is **consistent** with Perris 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 Perris GP and PVCCSP, and traffic associated with development of the site as a warehouse can be accommodated by the City's planned transportation system. Additionally, 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 the Perris GP Policy III.A.
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 City/PVCCSP designated truck routes to access I-215. 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

Policy No.	Policy	Statement of Consistency
		proposed Project is **consistent** with Perris 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 warehouse/distribution facility is consistent with the land use designation of the proposed Project site in the Perris GP and PVCCSP. The Project includes roadway and sidewalk improvements along the Project site frontage on the Rider Street and Redlands Avenue. These improvements will be required to be constructed in accordance with City standards. 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 Perris 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 dBA CNEL are identified in the Perris GP as "normally acceptable" and of up to 80 dBA CNEL as "conditionally acceptable" for industrial land uses. The *Noise and Vibration Study, First Industrial Warehouse at Rider/Redlands City of Perris* prepared for the proposed Project identified a buildout roadway noise level of up to 65.3 dBA CNEL in proximity to the Project site. (ENTECH, p. 28) In addition, the MARB/IPA LUCP identifies the Project site as being in an area within the 55 to 60 CNEL aircraft noise contour. Therefore, the Project is **consistent** with Perris GP Policy I.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*	The nearest sensitive receptor to the Project site is a nonconforming residential site adjacent to and east of the Project site. The *Noise and Vibration Study, First Industrial Warehouse at Rider/Redlands City of Perris* Project-evaluated noise impacts to ten residences in proximity to the Project site. Project generated operational noise at the nearest sensitive receptors is not predicted to exceed 56 dBA CNEL, which is below the "normally acceptable" noise level of 60 dBA CNEL for residential uses. For these reasons, the Project is **consistent** with Perris GP Policy V.A.

Policy No.	Policy	Statement of Consistency
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 Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and will pay applicable fees pursuant to City Ordinance No. 1123 to offset incremental impacts to biological resources from Project construction and operation. Appropriate mitigation has been identified in the Initial Study prepared for the proposed Project to ensure compliance with the Federal Migratory Bird Treaty Act (MBTA) and relevant sections of the California Fish and Game Code; therefore, the Project is **consistent** with Perris 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 Area Plan and appropriate mitigation has been identified in the Initial Study for the Project so that the Project is consistent with the MSHCP; therefore, the proposed Project is also consistent with Perris 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 significant historic properties identified within the Project area, and appropriate mitigation has been identified in the Cultural and Tribal Cultural Resources sections for the Project to ensure that impacts to archaeological and paleontological resources will be less than significant; therefore, the Project is **consistent** with Perris GP Policy 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, the Eastern Municipal Water District (EMWD), issued a will-serve letter for the Project November 5, 2019 indicating that the agency has sufficient supply to meet the water needs of the Project. Therefore, the Project is **consistent** with Perris 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 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 that will reduce any potential

Policy No.	Policy	Statement of Consistency
		construction-related water quality impacts to a less than significant level. Therefore, the Project is **consistent** with Perris 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 30% relative to the 2016 Title 24. Therefore, the Project is **consistent** with Perris GP Policy VIII.A.
Policy VIII.B:	*Adopt and maintain development regulations that encourage recycling and reduced waste generation by construction projects.*	Administration of development regulations is the responsibility of the City, not the individual Project applicant. Nonetheless, the Project will comply with applicable City and state policies intended to encourage waste reduction. This includes Perris Municipal Code Section 7.44.050, which requires that project construction divert a minimum of 50 percent of construction and demolition debris; Section 7.44.060, 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 Perris 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 development impact fees pursuant to City Ordinance No. 1182 to mitigate the cost of public facilities to support new development. Thus, the Project is **consistent** with Perris GP Policy II.A.
Policy III.A:	*Accommodate diversity in the local economy.*	The proposed Project is consistent with the LI land use designation for the site within the PVCCSP, which was adopted by the City to ensure quality, organized development within the Project site vicinity. Therefore, the proposed Project is **consistent** with Perris GP Policy III.A.
Policy V.A:	*Restrict development in areas at risk of damage due to disasters.*	The proposed Project site 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 Perris GP Policy V.A.

Policy No.	Policy	Statement of Consistency
Safety Element		
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.*	The proposed Project site is not within a high flood hazard area. The Project's on-site subsurface storm drain systems will adequately convey flows to the water quality basins located on the Project site and provide flood protection for the 100-year storm event. The proposed Project is **consistent** with Perris 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.*	The proposed Project is consistent with the 2014 MARB/IPA LUCP; therefore, the Project is **consistent** with Perris 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 (CBC), which provides criteria for the seismic design of buildings. Thus, the proposed Project is **consistent** with Perris GP Policy I.E.

The Project's consistency with the MARB/IPA ALUCP is discussed in *Threshold 5.9e.*

5.12. 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: GPEIR, COR-GP

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

12a. **No impact.** The GPEIR notes that lands within City are either designated Mineral Resource Zone Two (MRZ-2) or Mineral Resource Zone Three (MRZ-3), as defined by the California Department of Conservation. (GPEIR, p.VI-28.) The County of Riverside General Plan Figure OS-6 (COR GP), identifies the proposed Project site within MRZ-3. Within MRZ-3, available geologic information suggests that mineral deposits exist, or are likely to exist; however, the significance of the deposit is unknown. (GPEIR, p. VI-28.) Due to the existing warehouses and other developments surrounding the majority of the Project site, 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, no impacts are anticipated.

12b. **No impact.** No sites have been designated as locally-important mineral resource recovery sites on any local plan (GPEIR, p. VI-28). Therefore, no impact to the availability of a locally-important mineral resource recovery site will occur.

5.13. NOISE	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project result in:				
a) Generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

References: ALUC, ENTECH, GP, PVCCSP EIR, PMC

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

Airport Overlay Zone (from Chapter 12.0 of the PVCCSP)

- All building office areas shall be constructed with appropriate sound mitigation measures as determined by an acoustical engineer or architect to insure appropriate sound levels.

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

EXPLANATION OF CHECKLIST ANSWERS

13a. Less than significant impact with mitigation. Noise impacts are evaluated from two perspectives – impacts to the Project and impacts from the Project. Noise impacts to a project may occur as a result of excessive off-site noise sources. Noise impacts from a project may occur as a result of on-site activities or project-related traffic. To evaluate these impacts a *Noise and Vibration Study* was prepared for the Project by Entech Consulting dated April 2021 (ENTECH). This study is included as Appendix I to the IS.

Existing Ambient Conditions

For this Project, noise monitoring was conducted for 24-hours on the northeast corner of the Project site as shown on Figure 6 – Noise Monitoring Location in the *Noise and Vibration Study, First Industrial Warehouse at Rider/Redlands City of Perris* (Appendix I). The 24-hour average noise level at Site 1 A is 64 CNEL as shown in **Table 5.13-A – Existing (Ambient) 24-hour Noise Level Measurements)**. As shown in **Table 5.13-A**, the existing CNEL noise levels are within the Perris GP standards of up to 70 CNEL for industrial land uses; however, the existing ambient noise levels are above those accepted levels for residential land uses, which is up to 60 CNEL (Appendix I, Figure 4).

Table 5.13-A – Existing (Ambient) 24-hour Noise Level Measurements

Noise Monitoring Location ID	Address	Hourly Noise Levels (1 hr- L_{eq})				24-Hour CNEL Noise Level
		Daytime Minimum	Daytime Maximum	Nighttime Minimum	Nighttime Maximum	
Site 1	475 E. Rider Street (east of the Project site)	57.9	62.3	50.9	61.3	**64**

Source: Appendix I, Table 5-1

Construction Noise – Temporary

It was assumed that each construction activity would occur within a distance of 185 feet of the nearest residential receivers east of the Project site. These receptors may be affected by short-term noise impacts associated with the transport of workers, the movement of construction materials to and from the Project site, ground clearing, excavation, grading, and building activities. Construction noise is considered a short-term impact and would be considered significant if construction activities are undertaken outside the allowable times as described by the Perris Municipal Code Section 7.34.060 and/or if they cause noise levels to exceed 80 A-Weighted Decibels (dBA) L_{max} in residential zones. Construction is anticipated to occur during the permissible hours according to the Perris Municipal Code. Construction noise will have a temporary or periodic increase in the ambient noise levels above existing within the Project vicinity. The construction noise levels of the Project site are anticipated to be 78.2 dBA L_{max} at the nearest sensitive receptors, with the loudest activity associated with demolition and site grading. While the loudest construction activity is below the City's standards, the Project is subject to all applicable mitigation measures from the PVCCSP EIR. Therefore, with implementation of applicable PVCCSP EIR mitigation measures **PVCCSP MM Noise 1** through **PVCCSP MM Noise 4**, further reductions from potential construction-related noise will be realized and impacts are less than significant for short term noise from construction activities.

PVCCSP MM Noise 1: During all project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards. The construction contractors 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 will 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.

Project-Generated Traffic Noise Impacts

A potential noise impact would occur in locations where noise sensitive land uses exist adjacent to an identified roadway segment that Project traffic would increase noise levels 3 dBA CNEL or greater when the resulting noise levels exceed 60 dBA CNEL (PVCCSP EIR, p. 4.9-20.)

Traffic noise was modeled using the Federal Highway Administration's Traffic Noise Model (TNM) 2.5 to assess noise impacts at ten sensitive residential receiver locations for the following scenarios: Existing, Existing plus Project, Existing Plus Project with Placentia Interchange, Existing plus Ambient plus Cumulative plus Project, Existing plus Ambient plus Cumulative plus Project with Placentia Interchange. Noise levels were modeled at each receptor in order to calculate Project generated increases in ambient noise levels. The results are presented in **Table 5.13-B**.

Table 5.13-B – Traffic Noise Levels Near Sensitive Received Locations (dBA, CNEL)[a]

Receiver[b]	Existing	Existing plus Project Opening Year (2022)	Change in Noise Level	Existing plus Ambient plus Cumulative (2022)	Existing plus Ambient plus Cumulative plus Project (2022)	Change in Noise level
Without Placentia Interchange						
R1	63.1	63.7	0.6	64.5	65	0.5
R2	61.4	61.5	0.1	63.0	63.1	0.1
R3	60.4	60.5	0.1	62.1	62.1	0.0
R4	61.3	61.4	0.1	62.8	62.8	0.0
R5	61.3	61.4	0.1	62.8	62.8	0.0
R6	31.5	31.7	0.2	33.1	33.3	0.2
R7	41.7	41.9	0.2	42.7	42.9	0.2
R8	46.0	46.3	0.3	47.9	47.1	0.1
With Placentia Interchange						
R1	63.1	63.9	0.8	64.7	65.3	0.6
R2	61.4	62.3	0.9	64.1	64.7	0.6
R3	60.4	61.3	0.9	63.2	63.8	0.6
R4	61.3	61.4	0.1	62.8	62.8	0.0
R5	61.3	61.4	0.1	62.8	62.8	0.0
R6	31.5	32.3	0.8	34.0	34.5	0.5
R7	41.7	41.9	0.2	42.9	43.1	0.2
R8	46.0	46.2	0.2	47.2	47.3	0.1

Source: Appendix I, Table 7-1

Notes:

a Traffic noise levels are based on peak hour traffic volumes as a worst-case scenario. The 1-hour TNM L_{eq} dBA results were converted to dBA CNEL for each receiver location.

b Receiver location as shown on Figure 7 in Appendix I.

As shown above in **Table 5.13-B**, the modeled traffic noise levels for the existing (i.e., without Project traffic) range from 46.0 dBA CNEL to 63.1 dBA CNEL. The existing noise levels at all receivers, except R6, R7, and R8, are above 60 dBA CNEL. However, as also shown in **Table 5.13-B**, the increased noise levels resulting from Project-generated traffic at all of the modeled receivers for all scenarios are less than 1 dBA. The smallest recognizable change in sound levels is approximately 1 dBA. A 3 dBA change is generally considered perceptible, and a 5 dBA change is readily perceptible. A 10 dBA increase is judged by most people as approximate doubling of the sound loudness. (ENTECH, p. 9.) Since none of the modeled scenarios resulted in an increase of more than 3.0 dBA, noise impacts to off-site receptors due to Project generated traffic will be less than significant.

Operational Noise

Stationary-related noise impacts associated with rooftop HVAC equipment, on-site parking lot circulation, and the proposed 43-bay loading dock (including back-up beeps) were evaluated based on the maximum noise levels identified below in **Table 5.13-C**.

Table 5.13-C – Reference Noise Levels

Noise Source[a]	Duration of Measurement	Reference Distance from the Source (feet)	Noise Source Height (feet)	dBA L_{eq}		dBA L_{max}	
				At Reference Distance	At 50 feet	At Reference Distance	At 50 feet
Unloading/Loading[b]	15 minutes	10	8	69.6	55.6	76.1	62.1
Parking Lot Circulation[c]	30 minutes	12	5	71.3	58.9	81.2	68.8
Air Conditioning Units[d]	30 minutes	5	25	68.6	48.6	87.5	67.5

Source: Appendix I, Table 6.1

Notes:

a Noise measurements taken at the Temecula Costco Distribution Center on December 13, 2019

b Activities included in this measurement: back-up alarms, unloading a docked truck container.

c Activities included in this measurement: cars pulling in and out of spaces, exiting and entering parking lot.

d Activities included in this measurement: mechanical roof-top air conditioning unit on the roof.

The reference noise levels for the operational noise sources provided in **Table 5.13-C** were utilized to calculate the predicted operational source noise levels at receivers R1 through R10. The noise propagation attenuation formula was used to account for distance attenuation due to geometric spreading when sound from a localized stationary source propagates. Sound attenuates at a rate of 6 dB for each doubling of distance from a point source. This attenuation factor was applied to each reference noise level to obtain the predicted operational noise level. The predicted operational noise levels for each operational source type were combined to obtain the total Project-only operational noise level at each receiver location. As shown in **Table 5.13-D – Operational Noise Levels (dBA Leq)**, the combined Project operational noise levels at receivers R1 through R10 range from 43.7 to 59.9 dBA L_{max}. **Table 5.13-D** also shows that Project operations would result in a less than 1 dBA L_{eq} increase in nighttime noise levels, which is considered barely perceptible and the combined operational CNEL values range from 37 to 56. Therefore, operational noise levels associated with the Project will satisfy the Perris Municipal Code exterior noise level standards of 80 dBA L_{max} daytime and 60 dBA L_{max} nighttime and the General Plan Standard of 60 CNEL. (ENTECH, p. 29.) impacts are less than significant.

Table 5.13-D – Operational Noise Levels (dBA Lmax and CNEL)

Receiver[a]	Distance (in feet)	Noise Sources (dBA Lmax)[b]			Combined Operational Noise Level (dBA Lmax, CNEL)[c]	Measured Nighttime Ambient Noise Level[d] (dBA Leq)	Combined Nighttime Noise Level[e] (dBA Leq)	Nighttime Project Increase
		Unloading /Loading	Parking Lot Circulation	Air Conditioning Units				
R1	835	37.7	44.4	43.0	47.1, 43	58.1	58.1	0.0
R2	645	40.0	46.6	45.3	49.5, 45	58.1	58.2	0.1
R3	185	40.5	57.4	56.1	59.9, 56	58.1	58.7	0.6
R4	185	40.5	57.4	56.1	59.9, 56	58.1	58.7	0.6
R5	604	50.8	47.2	45.9	53.3, 46	58.1	58.2	0.1
R6	785	38.2	44.9	43.6	47.8, 44	58.1	58.1	0.0
R7	726	38.9	45.6	44.3	48.5, 44	58.1	58.1	0.0
R8	854	37.5	44.2	43.9	47.5, 43	58.1	58.1	0.0
R9	1,068	35.5	42.2	40.9	45.1, 37	58.1	58.1	0.0
R10	1,262	34.1	40.8	39.5	43.7, 39	58.1	58.1	0.0

Source: Appendix I, Table 8.1, 8.2, and 8.4

Notes:

a Receiver location as shown on Figure 8 in Appendix I.

b Calculated by taking the reference noise levels in **Table 5.13-C** and applying the 6 dBA doubling of distance propagation attenuation noise formula.

c Calculated logarithmically by adding the reference noise levels for each operating source type together to obtain a total noise level.

d Site 1 average measured nighttime nose level was used for receiver closest to Rider Street

e Calculated logarithmically by adding the reference noise levels for each operating source type together to obtain a total noise level

13b. Less than significant impact. Project-generated traffic and construction may result in ground vibration.

Construction Vibration

Construction activity can result in varying degrees of ground vibration, depending on the equipment used on the site. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. The threshold at which there may be a risk of architectural damage to normal houses with plastered walls and ceilings is 0.20 inches/second. Primary sources of ground-borne vibration levels resulting from construction activities occurring within the Project site were estimated by data published by the Federal Transit Administration (FTA). Construction activities that would occur within the Project site include grading, building construction, paving and painting. These activities have the potential to generate low levels of ground-borne vibration. As shown in **Table 5.13-E– Construction Equipment Vibration Levels**, the vibration levels expected at the nearest sensitive receiver, R3 and R4, is expected to be 59VdB, which is below the PVCCSP vibration threshold of 80VdB.

Table 5.13-E – Construction Equipment Vibration Levels

Noise Receiver[a]	Distance to Receiver's Property Line	Large Bulldozer Reference Vibration Level[b] (at 25 feet))	Peak Vibration Level at 225 feet
R3, R4	185 feet	87 VdB	59 VdB

Source: Appendix I, Table 10-4

Notes:

a Receiver location as shown on Figure 8 in Appendix I

b Reference noise level from the FTA *Noise and Vibration Manual*, Table 7-4

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 a distance of 25 feet. At 185 feet, construction vibration levels are expected to approach 59 VdB. Using the construction vibration assessment annoyance criteria provided by the FTA for infrequent events, the construction at the proposed Project site will not result in a perceptible human response (annoyance). Impacts at the closest sensitive receptor are unlikely to be sustained during the entire construction period. Moreover, construction at the Project site will be restricted to daytime hours, thereby eliminating potential vibration impact during the sensitive nighttime hours. Further, the predicted construction noise level is below the PVCCSP vibration threshold of 80 VdB, impacts would be less than significant. Nonetheless, as discussed under *Threshold 13a*, the Project will implement PVCCSP mitigation measures **PVCCSP MM Noise 1** through **PVCCSP MM Noise 4**.

Operational Vibration

Project operations will increase auto and truck traffic within the Project area. Per the *Caltrans Transportation Noise and Vibration Manua*l traffic, auto and heavy trucks traveling on roadways rarely generates vibration amplitudes high enough to cause structural or cosmetic damage. Nonetheless, a qualitative analysis is provided to evaluate the likelihood of vibration impacts from the Project utilizing the empirical vibration curve developed by Caltrans.

Based on the Caltrans vibration curve (Appendix I, Figure 9), vibration attenuates rapidly with distance. Based on the distance from the roadway centerlines to Receivers R1 through R8, the maximum worse-case vibration levels expected at these locations are near 0.08 millimeters per second (mm/s) or 0.0032 inches/second or 70 VdB. Caltrans and the FTA provide a range of perceptible annoyance levels and this predicted vibration level falls well below the distinctly perceptible level of 0.08 inches/second), below the FTA damage criteria of 0.3 inches/second, and the human annoyance level of 80 VdB. Further this worst-case vibration level from truck traffic would not exceed the Caltrans threshold of 0.2 inches/second. It is expected that actual vibration levels within the Project area from truck traffic will be lower than this worst-case level when soil type and pavement conditions are considered. On this basis, the potential for the Project to result in exposure of persons to, or generation of, excessive ground-borne vibration would be less than significant. (ENTECH, pp. 34–35.)

13c. Less than significant impact. According MARB/IPA LUCP, the proposed Project site is depicted as being in an area inside the 60-65 CNEL aircraft noise contour. Per the Perris GP Noise Element, industrial land uses can be exposed to noise levels up to 70 CNEL. Therefore, the proposed Project would not require special measures to mitigate aircraft-generated noise

and would not expose people residing or working in the Project area to excessive noise levels. Thus, impacts will be less than significant.

The Perris Valley Airport and Skydiving Center is a privately owned and operated airport within the City. The Perris Valley Airport Influence Area 1 limits residential uses in the airport's flight path. The proposed Project site is located approximately 4.5 miles north of the airport, outside of any influence areas. Therefore, no impacts are anticipated.

5.14. POPULATION AND HOUSING	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned 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 people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

References: SCAG, USCB

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

14a. Less than significant impact. According to the US Census Bureau, the City's population is 79,133 as of July 2018 (USCB). The Southern California Association of Governments (SCAG) estimates that the population of Perris is expected to increase to about 116,700 by the year 2040. (SCAG, p. 27.) 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 general Project vicinity and that the Project would not attract a significant amount of new residents to the City and, therefore, create a substantial demand for new housing in Perris.

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. 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. Therefore, construction and operation of the proposed Project will not significantly induce

substantial unplanned population growth either directly or indirectly. Therefore, impacts will be less than significant.

14b. Less than significant impact. The Project site is currently unoccupied and is partially developed with commercial and residential structures that will be demolished or removed. However, the PVCCSP land use designation for the Project site is Light Industrial. As such, this area is not intended to provide housing within the City and the three single family residences are legal, non-conforming uses. These residences are unoccupied and not available for occupancy. Further, there are other existing housing opportunities in the City. Therefore, the Project will not displace substantial numbers of existing people or housing and will not necessitate construction of replacement housing elsewhere. Impacts will be less than significant.

5.15. 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: ORD 1182, PVCCSP IS

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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.

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

4.2.1 Crime Prevention Measures

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 Design Standards and Guidelines (from Chapter 5.0 of the PVCCSP)

5.4 Off-Site Infrastructure Standards

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

15a. Less Than Significant Impact. The North Perris Fire Station No. 90 is located at 333 Placentia Avenue, approximately 0.36 miles southwest of the proposed Project site. It is expected that this fire station would provide first response to the proposed Project. City Ordinance No. 1182 establishes a developer impact fee (DIF) to mitigate the cost of public facilities needed to offset the impact of developing new facilities to support fire services (ORD 1182). The proposed Project will be required to comply with Ordinance No. 1182 in order to offset potential impacts to the local fire department.

Since the proposed Project does not propose new housing, any impacts will be considered incremental and can be offset through the payment of the appropriate development impact fees. The proposed Project will also be required to comply with all applicable fire code requirements for construction and access to the site and as such, will be reviewed by the City Fire Department to determine the specific fire requirements applicable to ensure compliance with these requirements. Thus, the proposed Project will not result in the need for new fire protection facilities, the construction of which could cause significant environmental impacts. Therefore, impacts are less than significant.

15b. 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 three miles southwest of the proposed Project site. As stated in *Threshold 15a,* 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. The proposed Project will be required to comply with Ordinance No. 1182 in order to offset potential impacts to the local police department. Thus, the proposed Project will not result in the need for new police protection facilities, the construction of which could cause significant environmental impacts. Therefore, impacts are less than significant.

15c. Less Than Significant Impact. The proposed Project is located within the boundaries of the Val Verde Unified School District (VVUSD). The proposed Project will not directly create a source of school-aged children, as the Project does not increase residential land use designations nor construct any housing. It may indirectly affect schools by providing a source of employment that may draw new residents into the area; however, appropriate developer impact fees, as required by state law, shall be assessed and paid to the school district. Since the proposed Project does not propose new housing, any potential impacts would be considered incremental and can be offset through the payment of the appropriate development impact fees. Thus, the proposed Project will not result in the need for new school facilities, the construction of which could cause significant environmental impacts. Therefore, impacts are less than significant.

15d. 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.

15e. Less Than Significant Impact. The proposed Project would not directly increase the demand for library or other public services 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 three miles southwest of the proposed Project site. The proposed Project is subject to development impact fees that are used to construct new library facilities or expand existing library facilities subsequent to increased demand. Since the proposed Project does not propose new housing, any impacts will be considered incremental and can be offset through the payment of the appropriate library mitigation fees. Therefore, impacts related to libraries are less than significant.

The nearest emergency medical service available to the proposed Project area is the Riverside County Regional Medical Facility in Moreno Valley, approximately six miles northeast of the Project site. Healthcare facilities are developed in response to perceived market demand by free enterprise. Therefore, the development of the proposed Project will not result in the construction for new or expanded medical facilities. The PVCCSP IS determined that any substantial adverse physical impacts associated with the provisions of new or physically altered medical facilities associated with development within the PVCCSP is considered to be less than significant. (PVCCSP IS, p. 17.) Therefore, impacts are considered less than significant.

5.16. 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: PVCCSP EIR

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

8.2.1.4 Employee Break Areas and Amenities

- 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

16a. Less than significant impact. The Project is proposed to operate as a warehouse and will not create a direct increase in the use of public 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.

16b. Less than significant impact. See response to *Threshold 16a*, above. The proposed Project involves construction and operation of a warehouse building and does not include recreational facilities or require the construction of recreational facilities. The proposed Project has been designed to be in compliance with the PVCCSP and will provide employee amenities, including striping for a half basketball court for employee use. Incremental indirect impacts to park

facilities will be offset via payment of applicable Recreational Facilities DIFs; therefore, impacts will be less than significant.

5.17. TRANSPORTATION	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☒	☐	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

References: PVCCSP, PVCCSP EIR, RCTC, WEBB-E

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

Onsite Design Standards and Guidelines (from Chapter 4.0 of the PVCCSP)

4.2.2.3 Pedestrian Access and On-Site Circulation

- 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 following mitigation measures from the PVCCSP EIR will be implemented by the Project through conditions of Project approval.

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 and the cost of other off-site improvements through payment of fair share mitigation fees which include TUMF (Transportation Uniform Mitigation Fee), DIF (Development Impact Fee) and 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 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.

PVCCSP MM Trans 7: Implementing project-level traffic impact studies shall be required for all subsequent implementing development proposals within the boundaries of the PVCCSP 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.

EXPLANATION OF CHECKLIST ANSWERS

17a. Less than significant impact with mitigation. In compliance with **PVCCSP MM Trans 7,** a *Traffic Impact Analysis* (TIA) dated August 2020 was prepared for the Project by Webb Associates (WEBB-E). The Project site has been designed to construct on-site roadway improvements consistent with the PVCCSP, as outlined in **PVCCSP MM Trans 1**. The proposed Project will participate in the phased construction of off-site traffic signals through payment of the Project's fair share of traffic signal mitigation fees which include TUMF, DIF, and NPRBBD as outlined in mitigation measure **PVCCSP MM Trans 3**. The fees shall be collected and utilized as needed by the City to construct the improvements necessary to maintain the required Level of Service (LOS) and build or improve roads to their build-out level.

The Riverside Transit Agency (RTA) operates Routes 41 in the Project vicinity (RTA). Pursuant to **PVCCSP EIR MM Trans 4**, RTA was contacted to determine if future provision of bus routing in the Project area would require bus stops at the Project access points.[13] RTA staff indicated no bus stops are required along the Project's frontage because two new bus stops are being included at the intersection of Rider Street and Redlands Avenue in conjunction with other projects. The proposed sidewalk adjacent to the Project site on both Redlands Avenue and Rider Street will allow for pedestrian access to these future bus stops. 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. Compliance with these policies and implementation of **PVCCSP MM Trans 4** and **PVCCSP MM Trans 5** will ensure that the Project will not conflict with the City's adopted policies, plans, or programs supporting alternative modes of transportation.

For the reasons set forth in the preceding paragraphs, impacts related to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities are less than significant with mitigation.

17b. Less than significant impact. Senate Bill 743 (SB 743) was passed by the California State Legislature and signed into law by Governor Brown in 2013. SB 743 required the Office of Planning and Research and the California Natural Resources Agency to develop alternative methods of measuring transportation impacts under the California Environmental Quality Act (CEQA). In December 2018, the California Natural Resources Agency finalized updates to the CEQA Guidelines, which included SB 743. CEQA Guidelines Section 15064.3 provides that transportation impacts of projects are, in general, best measured by evaluating the project's vehicle miles traveled (VMT). Automobile delay (often called Level of Service) will no longer be considered to be an environmental impact under CEQA. Automobile delay can, however, still be used by agencies to determine local operational impacts.

On June 9, 2020, the City of Perris adopted its *Transportation Impact Analysis Guidelines for CEQA* (TIA Guidelines) to help ensure that land use development and transportation projects comply with the latest CEQA requirements regarding VMT. The Perris TIA Guidelines are based on the recommendations provided in the Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) and the Western

[13] Personal communication with RTA staff on March 15, 2021.

Riverside Council of Governments (WRCOG) *Draft Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (updated March 2020). The TIA Guidelines provide standardized criteria and established thresholds of significance to be used for analyzing transportation impacts for CEQA. (TIA Guidelines, p. 1.)

The first step in evaluating a land use project's VMT impact is to perform an initial screening assessment. (TIA Guidelines, p. 2.) According to the TIA Guidelines, a project is presumed to have a less than significant impact on VMT if the project satisfies at least one of the following VMT screening criteria:

A. Is the project 100% affordable housing?

B. Is the project within one-half mile of qualifying transit

C. Is the project a local serving land use?

D. Is the project in a low VMT area?

E. Are the project's net daily trips less than 500 average daily trips (ADTs)? (TIA Guidelines pp. 2-6.)

WEBB prepared a VMT screening analysis for the proposed Project (included as Appendix K to this Initial Study) to ascertain if further VMT analysis is required. The results of the VMT screening analysis indicates that the proposed Project site is located in a low VMT-generating area (i.e., a low VMT-generating Traffic Analysis Zone (TAZ), the proposed Project is not unique in that the TAZ in which the Project site is located contains other warehouses and would not be misrepresented within the county traffic model (RivTAM). The TAZ contains other warehouse land uses and the Project is consistent with the PVCCSP. The results of the VMT analysis also concluded:

- The City average daily total VMT per service population is 27.59. The Project TAZ daily total VMT per service population is 21.99 which is 5.6 lower than the City average.

- The City average daily residential home-based VMT per capita is 15.05. The Project TAZ daily residential home-based VMT per capita is 13.16 which is 1.89 lower than the City average.

- The City average daily home-based work VMT per worker is 11.62. The Project TAZ daily home-based work VMT per worker is 9.95 which is 1.67 lower than the City average. (WEBB-G, p. 2.)

Thus, the proposed Project satisfies VMT screening criteria D (located in a low VMT area).

According to the TIA Guidelines, "If a project is located in a Traffic Analysis Zone (TAZ) with VMT per capita or VMT per employee that is less than or equal to the Citywide average, then the project is considered to be located in a low VMT area and can be presumed to have a less than significant impact on VMT." Therefore, impacts with regard to being in conflict with or inconsistent with CEQA Guidelines section 15064.3, subdivision (b) would be less than significant.

17c. Less than significant impact with mitigation. In compliance with **PVCCSP EIR MM Trans 1** and **MM Trans 2,** improvements related to on-site roadway design and safety will be reviewed by City staff and implemented to ensure adequate sight distance be provided at each Project access location. Thus, the Project does not entail any design features that would increase traffic hazards due to geometric design. The proposed warehouse/distribution facility is consistent with the on-site and surrounding land use and zoning designations, and as such implementation of the Project will not introduce incompatible uses to the Project Area. Thus, proposed Project will not substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, impacts are less than significant with mitigation.

17d. 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 site. 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. Thus, implementation of the proposed Project will not result in inadequate emergency access.

5.18. 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.	☐	☒	☐	☐

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

There are no Standards and Guidelines included in the PVCCSP related to tribal cultural resources. By preparing this Initial Study analysis, the Project has complied with PVCCSP EIR mitigation measure **PVCCSP MM Cultural 1**, the applicable PVCCSP EIR mitigation measure that is also applicable to tribal cultural resources. A full citation of each applicable PVCCSP EIR mitigation measure can be found in *Threshold 5b* of this Initial Study.

Additional PVCCSP EIR mitigation measures that are applicable to the proposed Project are incorporated into the following analysis.

EXPLANATION OF CHECKLIST ANSWERS

18a(i). Less than significant impact with mitigation. As discussed in *Threshold 5b* above, there are no items listed or eligible for listing in the California Register of Historical Resources, or a local register of historical resources at the Project site. Due to the presence of the historic standpipe within the Project site, the poor ground visibility during the survey, and previous disturbances, there still remains the potential for resources to be discovered during Project construction activities, Project-specific mitigation measure **MM CR 1** shall be implemented to reduce impacts related to historical and archaeological resources to a less than significant level.

18a(ii). Less than significant impact with mitigation. As of July 1, 2015, Assembly Bill 52 (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 Assembly Bill 52 Tribal Consultation process. On July 30, 2020, the City provided notification to the following four tribes in accordance with AB 52: the Agua Caliente Band of Cahuilla Indians, Pechanga Band of Mission Indians, Rincon Band of Mission Indians, and Soboba Band of Luiseño Indians. To date, the City has received a response from the Pechanga Band of Mission Indians. Consultation between the City and Pechanga Band was conducted on February 11, 2021. As a result of the consultation, the Project developer will implement mitigation measure **MM CR 1**, which requires a Native American Monitor from the Pechanga Band to monitor the initial grading of the Project site.

To date, none of the remaining tribes have responded to the AB 52 notification letter. Therefore, the City has concluded consultation. No evidence was provided to the City of the presence of TCRs at the Project site as a result of the AB 52 consultation efforts. Therefore, there are no officially designated TCRs at the Project site. Therefore, with implementation of mitigation measure **MM CR 1**, impacts to TCR will be reduced to a less than significant level.

5.19. UTILITIES AND SERVICE SYSTEMS	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) 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?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

References: CAL-B, CAL-C, EMWD UWMP, EMWD-WS, EPA, MWD, PVCCSP EIR, PVWRF

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

19a. **Less than significant impact.** The existing power poles and overhead lines that are within the interior of the Project site will be removed and the existing power poles along the Project's frontage on Redlands Avenue will be removed and power lines will be undergrounded. Existing electrical power, natural gas, and telecommunication facilities are available in Redlands Avenue and Rider Street to serve the Project site.

The existing Perris Valley Master Drainage Plan (PVMDP) storm drain Line "A-B" located in Rider Street will convey flows from the Project site to the Perris Valley Storm Drain (PVSD) Channel located 0.3-mile to the east. The Project includes the construction of two on-site storm drain

lines (Line A and Line B), four water quality basins, and one set of underground storage chambers and one stormwater lift station. (See **Figure 7 – Proposed Site Plan**.) The proposed basins will provide adequate water quality treatment for onsite runoff and the Project will not impact flooding conditions to upstream or downstream properties.

The Project will connect to the existing water and sewer lines that are located in Redlands Avenue. Since these utility connections will be constructed within existing roadways (Redlands Avenue or Rider Street) or the Project boundary, any resulting impacts from said utility construction have been addressed in this Initial Study.

Therefore, the proposed Project would not cause significant effects with regard to the construction of water, sewer, storm water drainage, electrical power, natural gas, or telecommunications facilities and impacts will be less than significant.

19b. **Less than significant impact.** The Project site is located within the service area of the Eastern Municipal Water District (EMWD). The EMWD provided a will-serve letter indicating an ability to provide potable water and sewer service to the Project on November 5, 2019 (EMWD-WS), included as Appendix L to this Initial Study. The Project will connect to the existing 12-inch diameter water pipeline and the 42-inch diameter sewer pipeline that are located in Redlands Avenue.

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 EMWD's 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. Recently, the EMWD adopted its updated 2015 UWMP, which contains more accurate projections for water supply and ability to serve the proposed Project area.

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 PVCCSP is anticipated to have a projected water demand of 2,671.5 acre-feet per year (AFY). The WSA prepared for the PVCCSP determined that there would be sufficient water supplies to serve proposed development within the PVCCSP area.

The EMWD adopted its 2015 UWMP, which details the reliability of the EMWD's current and future water supply. The EMWD has four sources of water supply: imported water from The Metropolitan Water District of Southern California (MWD), local groundwater, desalinated groundwater, and recycled water (EMWD UWMP, p. 3-3). The 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 (ERRP), expanding the desalter program with the Perris II Desalter, and full utilization of recycled water through implementation of an Integrated Resource Plan. (EMWD UWMP, p. 7-12.) Additionally, the EMWD aggressively promotes the efficient use of water through implementation of local ordinances, conservation programs and an innovative tiered pricing structure. (EMWD UWMP, p. 7-13.)

In 2015, approximately 40 percent of the EMWD's total retail supply was imported from the MWD (EMWD UWMP, p. 6-2). The MWD also prepared a 2015 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 SWP 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. (MWD, p. ES-5.)

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. Therefore, because the proposed Project is consistent with the land use designation for the site that was assumed in the most recent UWMP, and with payment of applicable fees, impacts to water supplies will be less than significant.

19c. Less Than Significant Impact. Wastewater collection and treatment service will be provided by the EMWD. Wastewater from the Project would be treated at the Perris Valley Regional Water Reclamation Facility (PVRWRF). The EMWD provided a Will Serve letter, on November 5, 2019, indicating an ability to provide potable water and sewer service to the Project. (EMWD-WS.) The Project will connect to the existing 12-inch diameter water pipeline and the 42-inch diameter sewer pipeline in Redlands Avenue.

Development associated with the PVCCSP, of which the Project is a part, will result in an increase in the amount of wastewater generated within the EMWD's service area. The PVCCSP is anticipated to generate approximately 5,316,295 gallons (5.3 mgd) of wastewater per day to be treated at the Perris Valley Regional Water Reclamation Facility (PVRWRF) at build-out. (PVCCSP EIR, p. 4.11-27.)

As of 2016, the PVRWRF accepts approximately 14 million gallons per day (mgd) but has a current treatment capacity of 22 mgd (PVRWRF). Thus, the total demand from the PVCCSP represents approximately 59 percent of the current PVRWRF capacity. A portion of the current wastewater treated at the PVRWRF consists of diversions from elsewhere in EMWD's service area. Therefore, because 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 EMWD has sufficient capacity to treat the wastewater generated by the PVCCSP.

Based on the wastewater generation factor of 1,700 gallons per day per acre (gpd/acre) for both General Industrial and Light Industrial PVCCSP land use designations applied in the PVCCSP EIR, the Project's proposed development of a warehouse/distribution facility on approximately 15-acre Project site would generate approximately 25,500 gpd (0.025 mgd) of wastewater that would be treated at the PVRWRF. As such, the proposed Project's wastewater generation represents less than one percent of the PVCCSP's total estimated wastewater generation (5.3 mgd).

Since the proposed Project consists of construction and operation of a warehouse/distribution facility, it is consistent with the land use designation in the PVCCSP and the wastewater generation analysis assumptions used for the PVCCSP EIR 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 the EMWD's ability to treat wastewater and will not contribute significantly to require construction or operation of new or expanded wastewater facilities. Thus, impacts will be less than significant.

19d. Less Than Significant Impact. Trash, recycling, and green waste services within 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, approximately 4.0 miles south of the Project site. 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 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 (tpd); or (2) the El Sobrante Landfill on Dawson Canyon Road in Corona, with a permitted daily capacity of 16,054 tpd. (CAL B; CAL C.)

Construction-Related Solid Waste

Overall, construction associated with Projects within the PVCCSP area is anticipated to generate approximately 104,671 tons of construction-related solid waste over a 20-year buildout period. Therefore, given the limited contribution of solid waste during an extended construction period, the PVCCSP EIR concluded that construction within the PVCCSP area would have a less than significant contribution to the exceedance of the permitted capacity of the designated landfills.

Based on the U.S. Environmental Protection Agency's (EPA's) construction waste generation factor for light industrial projects of 3.89 pounds per square foot, the proposed building of 324,147 SF will generate approximately 630 tons of construction-related solid waste (EPA, p. 2-4). This represents less than 0.005 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. 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.

Operational Solid Waste

The PVCCSP EIR estimates that operation of future development under the Specific Plan would generate approximately 544,049 tons per year of solid waste, which was determined to be approximately 11 percent of the combined annual capacity (i.e., yearly intake) of the Badlands and El Sobrante landfills. The PVCCSP EIR concludes that, with development of the PVCCSP, operational solid waste would not substantially contribute to exceeding the permitted capacity of these landfills.

Based on the California Department of Resources, Recycling and Recovery (CalRecycle) operational solid waste disposal factor of 0.0108 ton per square foot per year for the Light Industrial PVCCSP land use designation applied in the PVCCSP EIR, the Project's 324,147 SF of proposed industrial warehouse/distribution uses would generate approximately 3,501 tons per year of solid waste requiring landfill disposal. This represents less than 0.006 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. 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.

The proposed Project will be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs since the Badlands and El Sobrante Landfills have the capacity to support the construction and operational waste expected from the Project. Therefore, impacts will be less than significant.

19e. 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.

The California Integrated Waste Management Act under the Public Resource Code requires that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. By 2004, the City of Perris achieved a 51 percent waste diversion rate. In addition, Perris Municipal Code Section 7.44.050 requires that project construction divert a minimum of 50 percent of construction and demolition debris. Also, Section 7.44.060 requires the submittal of a waste management plan. In addition, the 2016 CalGreen Code requires to divert 65 percent of construction waste. Thus, the proposed Project will be required to comply with federal, state, and local statutes and regulations related to solid waste. Therefore, impacts are less than significant.

5.20. WILDFIRE	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒

5.20. WILDFIRE	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

References: CAL-A, GP, PVCCSP EIR

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

There are no PVCCSP EIR mitigation measures related to wildfire. Standards and Guidelines relevant to the analysis of wildfire impacts presented in this Initial Study include:

General Plan Safety Element

- Policy 1.C Fire: Reduce the risk of damages from fires
- A 30 ft. brush clearance radius for all structures with the City.
- A 150 ft. brush clearance requirement for structures on hillsides.

Weed Abatement (Section 7.08.045.)

- Property subject to abatement shall be cleared of all vegetation and rubbish. The property shall be free of fire hazard nuisances including dry or dead grasses, shrubbery or trees, and combustible refuse and waste or any material growing that may in reasonable probability constitute a fire hazard. The property shall be free of rubbish and vegetation which would hamper or interfere with the prevention or suppression of fire.

EXPLANATION OF CHECKLIST ANSWERS

20a. **No impact.** The proposed Project site is not located in or near any of the Fire Hazard Severity Zones (Moderate, High, Very High) within the State Responsibility Area (SRA) (CAL-A). Also, as shown in the GP Exhibit S-16 Wildfire Constraint Areas, the Project site is not located within the City's designated Wildlife Constraint area (GP; Safety Element, p 32). Road closures would not occur for the implementation of the Project and all work associated with the Project will take place on site. Because the Project will not entail any road closures, impacts to impairing an adopted emergency response plan or emergency evacuation plan, no impacts would occur. No mitigation is required.

20b. **No impact**. As noted in *Threshold 20a.* and *Threshold 7a(iv)*, above, the Project site is not in or near state responsibility areas or lands classified as Very High Fire Hazard Severity and the Project site is on relative flat land. Therefore, implementation of the Project will not result in substantial exposure of occupants to pollutant concentrations from a distant wildfire or the uncontrolled spread of a distant wildfire. Therefore, no impact would occur. No mitigation is required.

20c. **No impact.** The construction and maintenance operations of the Project will not result in the installation or maintenance of roads, fuel breaks, emergency water sources, power lines. The construction of the waterlines in Wilson Avenue are not a likely to exacerbate fire risk. Therefore, no impact would occur. No mitigation is required.

20d. **No impact.** As noted in *Threshold 10c(i)* and *Threshold 7a(iv)* above, the proposed Project, will not change existing drainage patterns and the Project site is on relatively flat land. Also, as noted in *Threshold 20a.* above, the Project site is not in in or near any of the Fire Hazard Severity Zones (Moderate, High, Very High) within the State Responsibility Area. For these reasons, impacts related to exposing people or structures to significant risk including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes related to flooding or landslide will not occur. No mitigation is required.

5.21. 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 substantially 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, substantially 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: Analysis in the preceding checklist.

EXPLANATION OF CHECKLIST ANSWERS

21a. **Less than significant impact with mitigation.** As discussed throughout the Initial Study, the proposed Project area does not contain sensitive biological resources that could potentially be affected by the proposed Project. All potentially significant impacts to biological resources would be avoided or reduced to a less than significant impact with the implementation of mitigation measures **PVCCSP MM Bio 1** and **MM Bio 2** identified in this IS as well as design features and measures already incorporated into the Project.

As discussed in *Thresholds 5.4a and 5.4b*, there are no known significant historic or archaeological resources at the Project site. Due to the presence of the historic standpipe within the Project site, the poor ground visibility during the survey, and previous disturbances, there still remains the potential for resources to be discovered during Project construction activities, implementation of Project-specific mitigation measures **MM CR 1** and **MM CR 2** set forth in Section 5.5 Cultural Resources shall be implemented to reduce potential impacts to less than significant levels.

Thus, the proposed Project will not 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 a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Therefore, impacts are less than significant with mitigation incorporated.

21b. Less than significant impact. The proposed Project is being developed according to the PVCCSP and is an allowed use under the site's Light Industrial land use designation in the PVCCSP; however, the PVCCSP may result in several cumulatively considerable impacts. Analysis contained in the PVCCSP EIR determined that construction associated within the PVCCSP may have cumulatively significant impacts in the following areas:

- *Air Quality:* Emissions generated by the overall PVCCSP area will exceed the SCAQMD's recommended thresholds of significance;
- *Noise:* Development in the overall PVCCSP area will result in substantial increases in the ambient noise environment at Project buildout;
- *Transportation:* Potential cumulative impacts to I-215, which is consistent with the findings in the Perris GP.

However, as demonstrated by the analysis in this IS, the proposed Project will not result in any unavoidable 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. Although the impacts of the proposed Project are determined to be less than significant, the Project would be subject to all of the applicable mitigation measures from the PVCCSP EIR, which would further reduce any Project contribution to cumulative impacts. 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.

21c. 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, tribal cultural resources, and utilities and services 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. Therefore, potential direct and indirect impacts on human beings that result from the proposed Project are considered less than significant with mitigation incorporated.

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