CITY OF PERRIS

MITIGATED NEGATIVE DECLARATION / INITIAL STUDY / MITIGATION MONITORING AND REPORTING PROGRAM FOR GO FRESH GAS STATION PROJECT MND 2363

GO FRESH GAS STATION PROJECT
P19-05295 - Conditional Use Permit

September 15, 2021

Lead Agency
CITY OF PERRIS
101 N. D Street
Perris, CA 92570

Prepared By
ECORP Consulting, Inc.
215 N. Fifth Street
Redlands, CA 92374
909-307-0046

MITIGATED NEGATIVE DECLARATION [GO FRESH GAS STATION]

Project Description:

Applicant is requesting approval of a Conditional Use Permit to construct and operate an automobile gas station consisting of a 3,960 square foot convenience store, 1,406 square foot retail store, 8-pump fuel canopy, underground storage tanks, and a 2,505 square foot automated carwash. On-site parking and landscaping are planned to be associated with the development.

Project Location:

An approximately 1.36-acre parcel west of the intersection of State Route (SR) 74 and Navajo Road on Assessor's Parcel Number (APN) 326-234-003.

Findings:

It is hereby determined that, based on the information contained in the attached Initial Study and with the implementation of mitigation measures, the Project would not have a significant adverse effect on the environment.

Mitigation Measures:

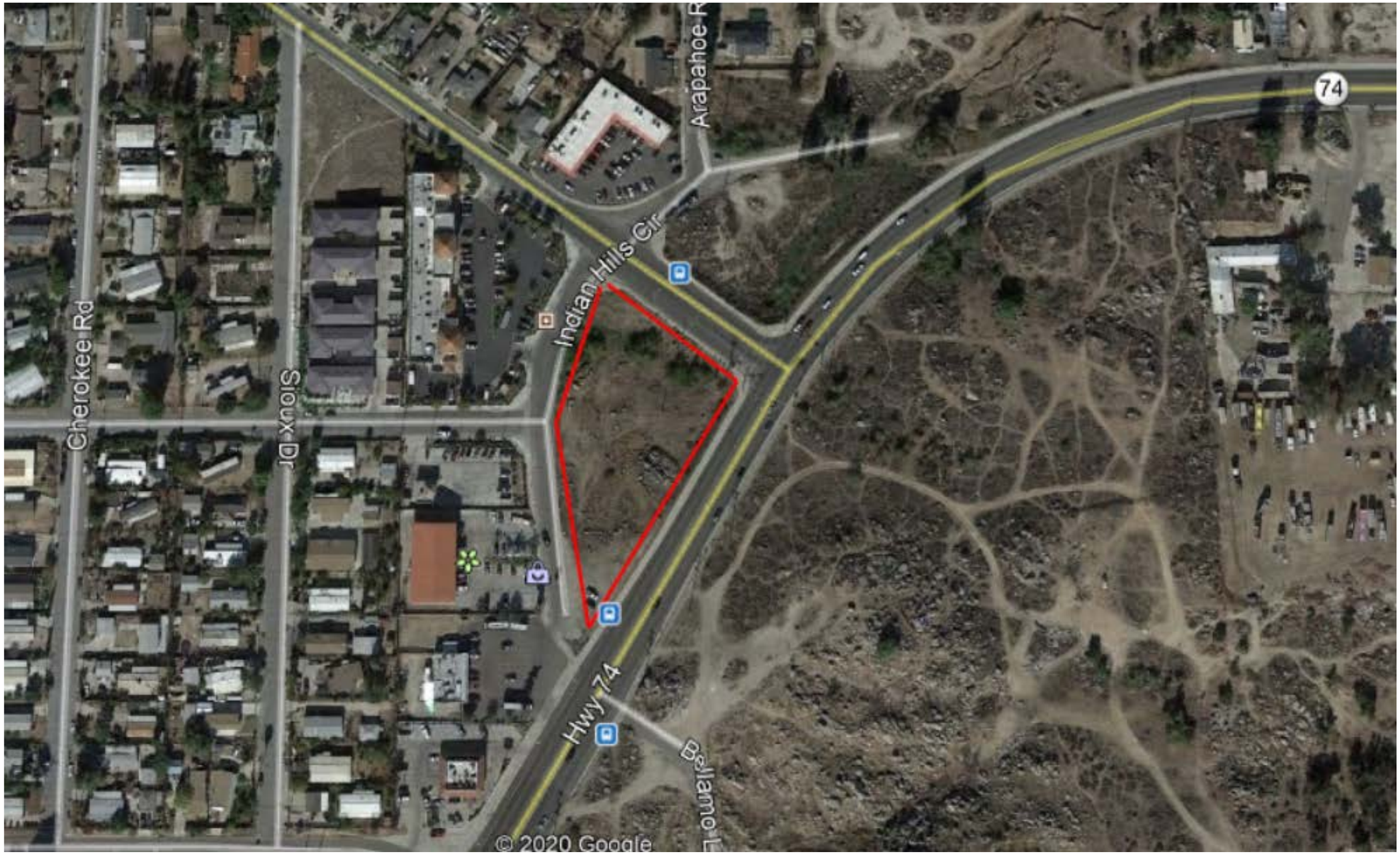
No.	Mitigation Measure
BIO-1	Lake or Streambed Alteration Notification prior to grading or alteration
BIO-2	Water Quality Certification Application prior to grading or alteration
BIO-3	Engage the County of Riverside Regional Conservation Authority with regard to Riparian/Riverine Resources
CUL-1	Verification prior to grading permit issuance
CUL-2	Tribal monitoring for tribal cultural resources during construction
CUL-3	Archaeologist attends pre-grading meeting
CUL-4	Monitoring for cultural resources during construction
CUL-5	Isolate and document non-significant deposits
CUL-6	Procedures for the discovery of human remains
CUL-7	Evaluation of uncovered historic/cultural resources
CUL-8	Process and curate all cultural material collected during grading monitoring program
CUL-9	Submit field and analysis results report including DPR Primary and Archaeological Site Forms
TRANS-1	Fair share cost contribution for traffic impacts

Vegetation clearing and preliminary ground-disturbance work shall be completed outside of bird breeding season (typically set as February 15 through September 1). In the event that initial groundwork cannot be conducted outside of the bird breeding season, nesting bird clearance surveys shall be conducted by a qualified biologist no more than 3 days prior to any disturbance to avoid take of nesting birds. Should nesting birds be found, an exclusionary buffer shall be established by the biologist. The buffer may be up

to 500 feet in diameter depending on the species of nesting bird found. This buffer shall be clearly marked in the field by construction personnel under the guidance of the biologist, and construction or clearing shall not be conducted within this zone until the biologist determines that the young have fledged or the nest is no longer active.

Attachments:

1. Location Map
2. Initial Study
3. Mitigation Monitoring and Reporting Program



Map Date: *12/15/2020*
Photo (or Base) Source:

ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

Figure 1. Project Location

2020-182

CITY OF PERRIS

INITIAL STUDY FOR GO FRESH GAS STATION PROJECT

GO FRESH GAS STATION PROJECT

P19-05295 - Conditional Use Permit

September 15, 2021

Lead Agency
CITY OF PERRIS
101 N. D Street
Perris, CA 92570

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INITIAL STUDY (IS) FOR
GO FRESH GAS STATION PROJECT

BACKGROUND INFORMATION AND PROJECT DESCRIPTION:

1. **Project Case Number(s):** P19-05295 - Conditional Use Permit
2. **Project Title:** Go Fresh Gas Station Project
3. **Lead Agency:** City of Perris
   Alfredo Garcia, Associate Planner
4. **Prepared By:** David Atwater
   Senior Environmental Planner
   ECORP Consulting, Inc.
   215 N. Fifth Street
   Redlands, CA 92374
   909-307-0046
   datwater@ecorpconsulting.com

5. **Project Sponsor:**

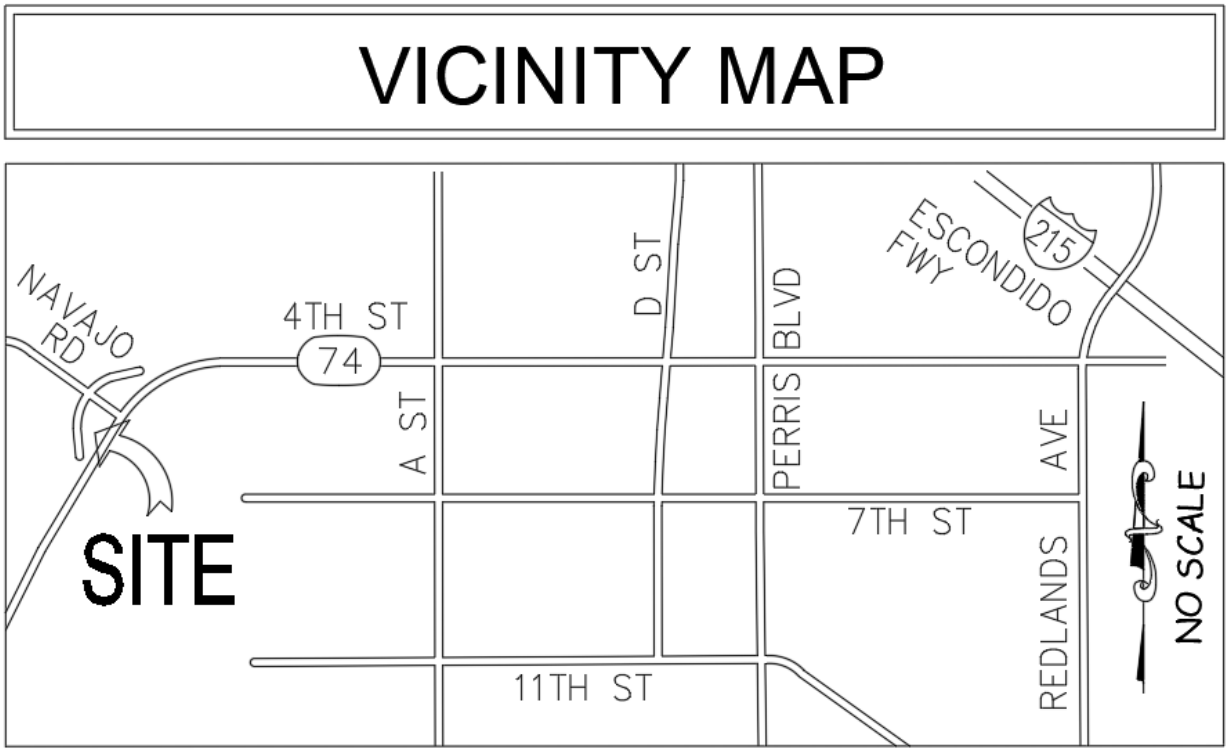
Applicant/Developer
Mohammad Kaskas
Go Fresh, LLC.
3401 Long Beach Boulevard
Long Beach, CA 92807
310-948-2236
unitedllc2@gmail.com

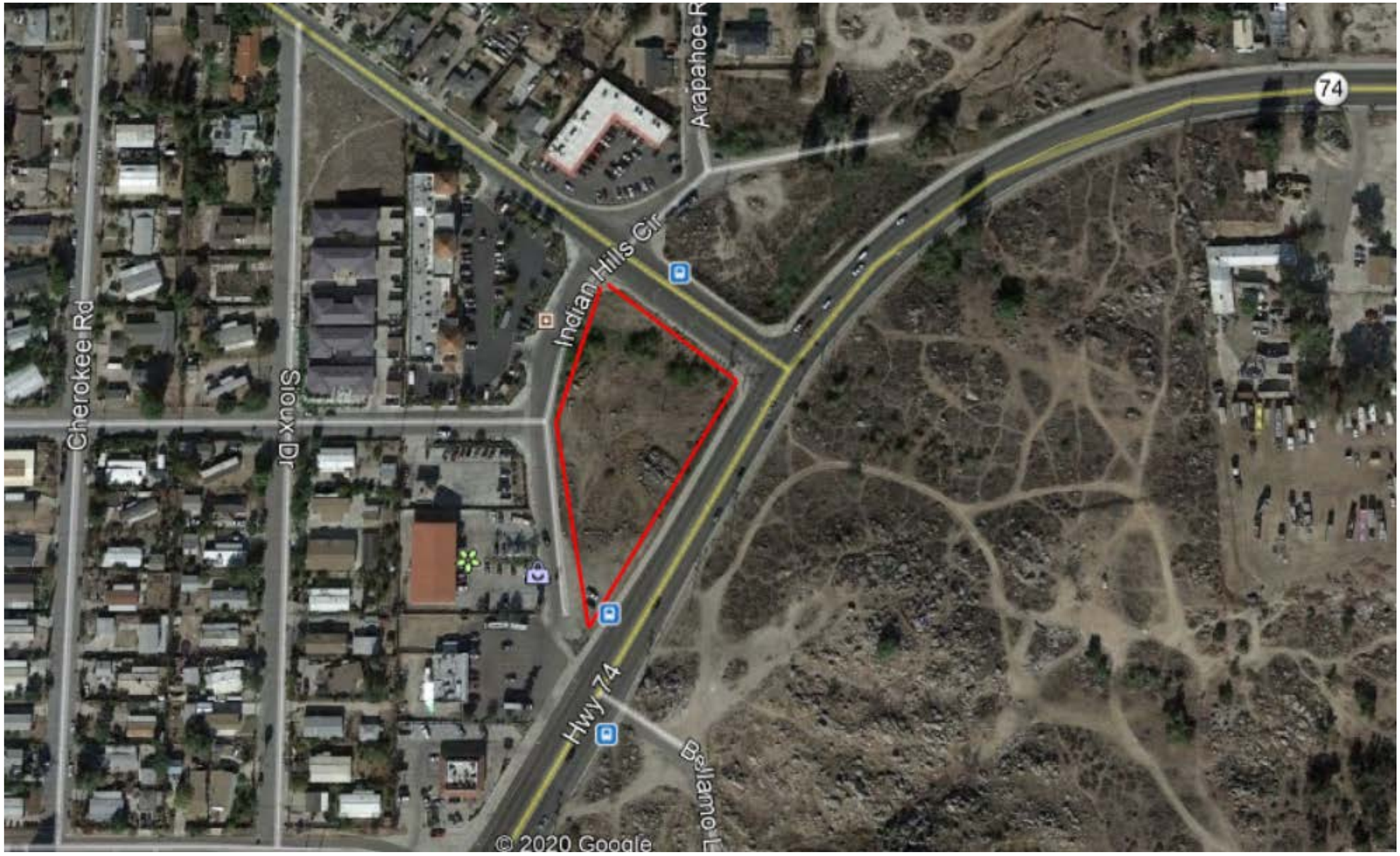
Property Owner
Same as Applicant/Developer

6. **Project Location:**

The Proposed Project is located on an approximately 1.36-acre parcel northwest of the intersection of State Route 74 and Navajo Road in the City of Perris (Figures 1 and 2). The Proposed Project is located on Assessor's Parcel Number (APN) 326-234-003-7. The Proposed Project is within the U.S. Geological Survey (USGS) 7.5-minute Perris topographic quadrangle.

Figure 1. Project Vicinity





Map Date: *12/15/2020*
Photo (or Base) Source:

ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

Figure 1. Project Location

2020-182

9. **General Plan Designation:** Commercial Community (CC)

The primary purpose of areas designated CC is to provide property for business purposes, including, but not limited to, professional offices, department stores, discount stores, furniture/appliance outlet, home improvement centers, entertainment centers, and sub regional/regional shopping centers. The zoning regulations shall identify the particular uses permitted on each parcel of land, which could include compatible noncommercial uses. Commercial Community development intensity should not exceed a Floor Area Ratio of 0.75 and the average floor area ratio should be significantly less.

10. **Specific Plan Name and Designation:**

The Project is not located in an area under one of the City of Perris' ten specific plans.

11. **Existing Zoning:** Commercial Community (CC)

The primary purpose of the CC zone is to provide for retail, professional office, and service-oriented business activities which serve the entire City. This zone shall be applicable to and correlate with the general plan land use designation of commercial community.

The Proposed Project would develop a gas station consisting of a convenience store, retail store, fuel canopy, underground storage tanks, and an automated carwash. The Project would be required to obtain a Conditional Use Permit (CUP) under City Municipal Code Section 19.38.030 *Uses Subject to a Conditional Use Permit*. With the required CUP, the Project would be compatible use with the Project Site's General Plan land use designation of CC and zoning designation of CC.

12. **Surrounding Land Uses and Setting:**

	Land Use	General Plan	Zoning
Project Site	**Undeveloped**	**CC**	**CC**
North	Commercial; Residential	R-6,000	R-6,000
South	Commercial; Undeveloped	R-10,000	CC
East	Commercial; Undeveloped	CC	CC
West	Commercial; Residential	CC	CC

13. **Description of the Site and Project:**

Environmental Setting

The Project is located west of the intersection of State Route 74 and Navajo Road on an approximately 1.36-acre parcel (APN 326-234-003-7). The Project Area is currently vacant land with seasonal grasses, boulders, rocks, rock outcrops, and a power line with associated poles. The southern portion of the site crests slightly above the adjacent street grade and the northern portion dips slightly below the adjacent street grade. The elevations on site range from approximately 1,585 to 1,567 feet above mean sea level.

Project Description

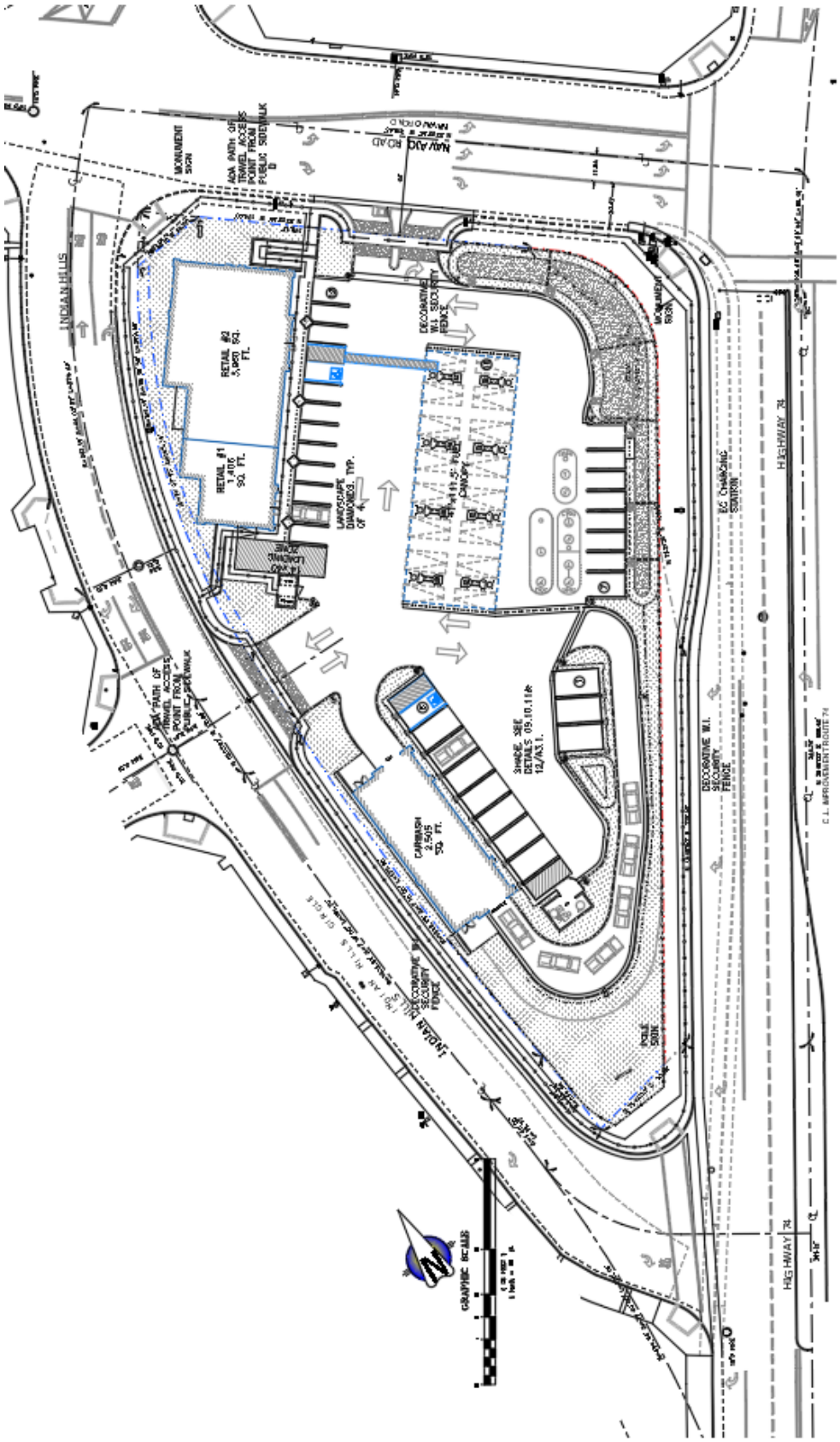
The Go Fresh Gas Station Project (Proposed Project) would develop an automobile gas station consisting of a convenience store, retail store, fuel canopy, underground storage tanks, and an automated carwash. On-site parking and landscaping are planned to be associated with the development. The Proposed Project's site plan is shown in Figure 3.

The convenience and retail store would be composed of one building. The convenience store would measure 3,960 square feet (sq. ft.) and the retail store would measure 1,406 sq. ft. The convenience and retail store building would consist of a wood framed building with stucco walls on a concrete slab on grade foundation. The fuel canopy would measure 4,570 sq. ft. and have eight fuel dispensing pumps. Four underground fuel storage tanks would be installed. The car wash would measure 2,505 sq. ft. and have 12 on-site parking spaces with vacuums for customers.

Proposed site improvements would also include the installation of driveways, parking, landscaping, stormwater drainage system, water and sewer connections, and lighting. Site access would be provided via two driveways, one on Navajo Road and one on Indian Hills Circle. The Navajo Road driveway would be right-in and right-out access only. The Indian Hills Circle driveway would be a full access driveway. The Proposed Project would provide a total of 35 parking spaces, including 17 standard parking spaces, 16 parking spaces in the pump area under the fuel canopy, and 1 Americans with Disabilities Act (ADA) compliant parking space. Additionally, one electric vehicle charging station, which is ADA/van accessible, would be provided. A total landscape area of 17,186 sq. ft. would be provided.

Stormwater originating in the Project Area would be conveyed via surface flows to gutters which would direct stormwater to a bioretention basin located within the landscape areas of the Project Area prior to discharging onto the existing storm drain system on Navajo Road. The Proposed Project would connect to existing water and sewer infrastructure within adjacent streets.

Figure 3. Site Plan



14. **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.?**

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Consultation is being conducted by the City of Perris.

15. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

Santa Ana Regional Water Quality Control Board (RWQCB) (National Pollutant Discharge Elimination System [NPDES] Permit)

16. **Other Technical Studies Referenced in this Initial Study:**

a. Air Quality and Greenhouse Gas Emissions Assessment Go Fresh Gas Station (ECORP Consulting, Inc. 2020)

b. Aquatic Resources Assessment Memorandum Go Fresh Gas Station (ECORP Consulting, Inc. 2021)

c. Phase I Cultural Resources Survey for the Go Fresh Gas Project, Perris, California (Brian F. Smith and Associates, Inc. 2019)

d. Habitat Assessment Report – Go Fresh Gas Station and Car Wash, Indian Hills Circle at Tomahawk Road, Perris, Riverside County, California (Pacific Southwest Biological Services Inc. 2019)

e. Geotechnical Engineering Investigation, Proposed Gas Station and Carwash Highway 74 and Navajo Road Perris, California (SALEM Engineering Group, Inc. 2019)

f. Traffic Impact Study Go Fresh Gas Station at Southwest Corner of SR-74 and Navajo Road, Perris (K2 Traffic Engineering, Inc. 2020)

17. **Acronyms:**

ADA	Americans with Disabilities Act
ADT	Average Daily Trips
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
BAAQMD	Bay Area Air Quality Management District
BFSA	Brian F. Smith and Associates, Inc.
CAA	Clean Air Act

CalEEMod	California Emissions Estimator Model
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CC	Commercial Community
CCR	California Code of Regulations
CDF	California Department of Forestry and Fire Protection
CEQA	California Environmental Quality Act
CH_4	Methane
City	City of Perris
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
County	Riverside County
CUP	Conditional Use Permit
DOC	Department of Conservation
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substance Control
EMWD	Eastern Municipal Water District
EOP	Emergency Operations Plan
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
GHG	Greenhouse Gas
GP	General Plan
IS	Initial Study
LHMP	Local Hazard Mitigation Plan
LOS	Level of Service
LST	Localized Significance Threshold
LUST	Leaking Underground Storage Tank
MARB	March Air Reserve Base
MARB/IPA	March Air Reserve Base/Inland Port Airport
mgd	million gallons per day
MIP	March Inland Port
MLD	Most Likely Descendant
MRZ	Mineral Resource Zone
MSHCP	Multiple Species Habitat Conservation Plan
N_2O	Nitrous Oxide
NAHC	Native American Heritage Commission
NO_2	Nitric Dioxide
NO_x	Nitric Oxides
NPDES	National Pollutant Discharge Elimination System
O_3	Ozone
OPR	Office of Planning & Research, State
PM	Particulate Manner
$PM_{2.5}$	Fine Particulate Manner
PM_{10}	Coarse Particulate Manner
PRC	Public Resource Code
PSBS	Pacific Southwest Biological Services, Inc.
PVRWRF	Perris Valley Regional Water Reclamation Facility
RCHCA	Riverside County Habitat Conservation Agency
RCPG	Regional Comprehensive Plan and Guide

ROG	Reactive Organic Gas
RTA	Riverside Transit Agency
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
RWRF	Regional Water Reclamation Facility
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SIP	State Implementation Plan
SKRHCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SLF	Sacred Lands File
SMARA	Surface Mining and Reclamation Act of 1975
SO_2	Sulfur Dioxide
Sq. ft.	Square Feet
SR	State Route
SRA	State Receptor Area
SoCAB	South Coast Air Basin
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TAZ	Traffic Analysis Zone
USFWS	United States Fish and Wildlife
USGS	United States Geologic Survey
VMT	Vehicle Miles Traveled
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Government
WRCMSHCP	Western Riverside County Multiple Species Habitat Conservation Plan

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture & Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology & Soils	☐ Greenhouse Gas Emissions	☐ 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

DETERMINATION (To be completed by the Lead Agency):

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 will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will 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 will 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" 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	Date
Printed Name	City of Perris For

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a Lead Agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the Lead Agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or another CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analyses Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where

appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources. A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and

   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code §21099 – Modernization of Transportation Analysis for Transit-Oriented Infill Projects – **Would the project:**				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

Response:

Scenic vistas can be impacted by development in two ways. First, a structure may be constructed that blocks the view of a vista. Second, the vista itself may be altered (i.e., development on a scenic hillside). The natural mountainous setting of the Perris Valley area is critical to its overall visual character and provides scenic vistas for the community. Topography and a lack of dense vegetation or urban development offer scenic views throughout the City, including to and from hillside areas. Scenic features include gently sloping alluvial fans, rugged mountains and steep slopes, mountain peaks and ridges, rounded hills with boulder outcrops, farmland, and open space. Scenic vistas provide views of these features from public spaces.

The City of Perris General Plan describes the Project Area as a flat, broad basin with rolling foothills to the east and west of the basin. Significant scenic vistas that may be viewed from the Project Area include the Russell Mountains and Bernasconi Hills within the Lake Perris State Recreation Area, located approximately five miles northeast of the Project Area. Views immediately west of the Project Area consist of commercial and residential uses and decorative trees, views immediately to the north and east consist of vacant land and SR-74, and views immediately to the south are of vacant land and residences. Structures in the City of Perris and in the vicinity of the Project Area consist of low-rise buildings that partially preserve views of nearby mountains and hills. The Project Area is not considered to be within or to comprise a portion of a scenic vista; therefore, the Proposed Project would not alter existing scenic vistas. The Project vicinity is comprised of mostly commercial uses, residential uses, and vacant land. The proposed convenience store, car wash, and gasoline fueling station would be consistent with the scale of structures and would be consistent with the land uses found in this area. The allowable structure height in the Project Area is 45 feet. The proposed convenience store would be 25-feet at its highest point, the proposed car wash would be 24 feet at its highest point, and the proposed fueling station canopy would be 17½-feet at its highest point. The Proposed Project would not introduce structures that would adversely affect the scenic vistas of the Russell Mountains and Bernasconi Hills; therefore, impacts would be less than significant. No mitigation is required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

Response:

The Proposed Project is located along SR-74, which is an eligible state scenic highway (Caltrans 2020a). SR-74 is classified as a Scenic Highway by the City's General Plan Open Space Element (City of Perris 2006). The Project Area is vacant land with seasonal grasses, boulders, rocks, rock outcrops, and a power line with associated poles. No trees are located in the Project Area and all boulders and bedrock outcrops on the property appeared to have been pushed to their current location as there is evidence of rough grading that had previously occurred on the southern quarter of the Project Area. It is unclear if they originated from the Project Area or have been moved to the subject property as nearby parcels were developed through the twentieth century (BFSA 2019). The rock outcrops on the Project Area are relatively low profile and do not contain any unique scenic qualities. Properties surrounding the Project Area to the north and east contain a significant number of rocks that are of much greater size and scale and rock outcroppings in the Project vicinity are a common site. There are no historic buildings in the Project Area. The Proposed Project will not substantially damage scenic resources within a state scenic highway. No impacts would occur, and no mitigation is required.

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	☐	☐	☐	☒

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
conflict with applicable zoning and other regulations governing scenic quality?				

Response:

The Proposed Project would develop an automobile gas station consisting of a convenience store, retail store, fuel canopy, underground storage tanks, and automated carwash. The Project Area has a General Plan land use designation of CC and a zoning designation of CC. The primary purpose of the CC district is to provide for the general shopping needs of area residents and workers with a variety of business, retail, personal, and related or similar services. The Proposed Project would develop a gas station which would be compatible use with the Project Area's General Plan land use designation of commercial and zoning designation. The Proposed Project would develop facilities that, with the required CUP, would be consistent and compatible with the existing commercial land uses located adjacent to the Project Area. As such, the Proposed Project is not expected to substantially degrade the existing visual character or quality of public views of the Project Area or its surroundings. No impact would occur, and no mitigation is required.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Response:

The Proposed Project would include light fixtures for parking areas within the Project Area. These light fixtures would provide increased visibility to driveways and throughout the site for security. Light fixtures would be shielded and directed downward to avoid spillover effects to surrounding properties, and lighting will comply with the City of Perris Municipal Code requirements. Onsite lights layout and landscaping will be reviewed/approved by the planning/building and safety department. The exterior finishes of proposed structures would have low glare properties and no materials with high reflectivity are proposed. Impacts would be less than significant, and no mitigation is required.

Sources:

1. City of Perris General Plan
   - Open Space Element (adopted 2006)
2. Title 19 – Zoning of the Perris Municipal Code
   - Section 19.02.110 – Lighting
3. Caltrans 2020 - Scenic Highways. Available at https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed on August 11, 2021.
4. Brian F. Smith and Associates, Inc. 2019. A Phase I Cultural Resources Survey for the Go Fresh Gas Project, Perris, California. July 31, 3019.

II. AGRICULTURE AND FOREST RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest protocols adopted by the California Air Resources Board.

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?	☐	☐	☐	☒

Response:

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The Proposed Project is not located on farmland or within the vicinity of any farmland uses (City of Perris 2005a). The California Farmland Mapping and Monitoring Program (FMMP), Important Farmland Map for Riverside County does not list the soils in the Project Area as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) (Department of Conservation [DOC] 2017). Therefore, the Proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. No impact would occur, and no mitigation is required.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

Response:

The Project Area is zoned as CC and is not located in an agricultural use zone. According to the California Department of Conservation Williamson Act Parcels Map for Riverside County, the Project Area is not subject to a Williamson Act Contract (DOC 2017). Therefore, the Proposed Project would not result in a conflict with an agricultural use zoning designation or a Williamson Act contract. No impact would occur, and no mitigation is required.

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))?	☐	☐	☐	☒

Response:

The Project Area is zoned as CC and not zoned for forest land. The Project Area is currently undeveloped and does not contain forestland or timberland. Surrounding areas are either vacant or developed with commercial and residential land uses. No impact would occur, and no mitigation is required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

Response:

Please refer to Checklist Response II c), above. No impact would occur, and no mitigation is required.

e) Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Response:

The Project Area and the surrounding properties are not currently used for agriculture. The Proposed Project would not result in the conversion of forest land to non-forest use. No impact would occur, and no mitigation is required.

Sources:

1. City of Perris General Plan
   - Conservation Element (adopted 2005, amended 2008)
2. Title 19 – Zoning of the Perris Municipal Code
   - Chapter 19.38 – CC Zone (Commercial Community)
3. California Department of Conservation. 2017. California Important Farmland Finder. Available at https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed August 11, 2021.

III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. **Would the project:**

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

Response:

The Project Area is located in the City of Perris, located in northwest Riverside County. The California Air Resource Board (CARB) has divided the state into regional air basins according to topographic features. The Project Area lies in a region identified as the South Coast Air Basin (SoCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties and all of Orange County. The local air quality agency affecting the SoCAB is the South Coast Air Quality Management District (SCAQMD), which is charged with the responsibility of implementing air quality programs and ensuring that national and state ambient air quality standards are not exceeded and that air quality conditions are maintained in the SoCAB. In an attempt to achieve national and state ambient air quality standards and maintain air quality, the air district has completed several air quality attainment plans and reports, which together constitute the State Implementation Plan (SIP) for the portion of the SoCAB encompassing the Proposed Project. The SCAQMD has also adopted various rules and regulations for the control of stationary and area sources of emissions.

Both the U.S. Environmental Protection Agency (USEPA) and the CARB have established ambient air quality standards for common pollutants. These ambient air quality standards are levels of contaminants representing safe levels that avoid specific adverse health effects associated with each pollutant. The ambient air quality standards cover what are called "criteria" pollutants because the health and other effects of each pollutant are described in criteria documents. The six criteria pollutants are ozone (O_3) precursor emissions include nitrogen oxide (NO_x) and reactive organic gases (ROG), carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. The Riverside County portion of the SoCAB region is designated as a nonattainment area for the federal O_3 and fine particulate matter ($PM_{2.5}$) and is also a nonattainment area for the state standards for O_3, coarse particulate matter (PM_{10}), and $PM_{2.5}$.

The SCAQMD is required, pursuant to the federal Clean Air Act (CAA), to reduce emissions of criteria pollutants for which the SoCAB is in nonattainment. In order to reduce such emissions, the SCAQMD drafted the 2016 Air Quality Management Plan (AQMP). The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The 2016 AQMP is a regional and multi-agency effort including the SCAQMD, CARB, the Southern California Association of Governments (SCAG), and the USEPA. The plan's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's 2016 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. (SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans.) The Proposed Project is subject to the SCAQMD's AQMP.

According to the SCAQMD, in order to determine consistency with SCAQMD's air quality planning two main criteria must be addressed.

Criterion 1:

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.

a) Would the project result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new air quality violations?

As shown in Tables III-1, III-2, and III-3 below, the Proposed Project would result in emissions that would be below the SCAQMD regional and localized thresholds during both construction and operations. Therefore, the Proposed Project would not result in an increase in the frequency or severity of existing air quality violations and would not have the potential to cause or affect a violation of the ambient air quality standards.

b) Would the project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?

As shown in Tables III-1 and III-3, the Proposed Project would be below the SCAQMD regional thresholds for construction and operations. Since the Proposed Project would result in less than significant regional emission impacts, it would not delay the timely attainment of air quality standards or AQMP emissions reductions.

Criterion 2:

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning within the SoCAB focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining Project consistency focuses on whether or not the Proposed Project exceeds the assumptions utilized in preparing the forecasts presented its air quality planning documents. Determining whether or not a project exceeds the assumptions reflected in the 2016 AQMP involves the evaluation of the three criteria outlined below. The following discussion provides an analysis of each of these criteria.

a) Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the 2016 AQMP?

A project is consistent with regional air quality planning efforts in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the SCAQMD air quality plans. Generally, three sources of data form the basis for the projections of air pollutant emissions in Perris. Specifically, SCAG's Growth Management Chapter of the Regional Comprehensive Plan and Guide (RCPG) provides regional population forecasts for the region and SCAG's 2016 RTP/SCS provides socioeconomic forecast projections of regional population growth. The City of Perris General Plan is referenced by SCAG in order to assist forecasting future growth in Perris.

The Project Area has a General Plan land use designation of CC. As previously described, the CC land use designation is intended for professional offices, department stores, discount stores, furniture/appliance outlets, home improvement centers, entertainment centers and sub regional/ regional shopping centers. The Project is proposing an automobile gas station consisting of a convenience store, retail store, fuel canopy, underground storage tanks, and automated carwash. The Project is not proposing to amend the City General Plan and is consistent with all land use designations applied to the site and would not increase the number of people residing in the area. Additionally, the Proposed Project is considered 'infill development' as it proposes to develop a property in a rapidly urbanizing area surrounded by predominately urban residential uses. As a result of proposing a mix of commercial land uses in an area devoid of such uses and surrounded heavily by residences, the Proposed Project can be identified for its "location efficiency". Location efficiency describes the location of the Proposed Project relative to the type of urban landscape its proposed to fit within. In general, compared to the statewide average, a project with location efficiency can realize automotive vehicle mile trip (VMT) reductions between 10 and 65 percent (CAPCOA 2017). The Proposed Project would locate complementary commercial land uses in close to proximity to existing offsite residential uses, thereby providing commercial and work options to the existing, nearby residents currently living near the site. The location efficiency of the Project Area would result in synergistic benefits that would reduce vehicle trips and VMT compared to the statewide average and would result in corresponding reductions in transportation-related emissions, a primary goal of the 2016 AQMP. Thus, the Proposed Project is consistent with the City of Perris General Plan and is therefore consistent with the types, intensity, and patterns of land use envisioned for the site vicinity in the 2016 RTP/SCS and RCPG. As a result, the Proposed Project would not conflict with the land use assumptions or exceed the population or job growth projections used by SCAQMD to develop the 2016 AQMP. The City's population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City; and these are used by SCAG in all phases of implementation and review. Additionally, as the SCAQMD has incorporated these same projections into their air quality planning efforts, it can be concluded that the Proposed Project would be consistent with the projections. (SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general

plans.) Therefore, the Proposed Project would be considered consistent with the population, housing, and employment growth projections utilized in the preparation of SCAQMD's air quality plans.

b) Would the project implement all feasible air quality mitigation measures?

In order to further reduce emissions, the Proposed Project would be required to comply with emission reduction measures promulgated by the SCAQMD, such as SCAQMD Rules 201, 402, 403, 1113, and 1401. SCAQMD Rule 402 prohibits the discharge, from any source whatsoever, in such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. SCAQMD Rule 403 requires fugitive dust sources to implement Best Available Control Measures for all sources, and all forms of visible PM are prohibited from crossing any property line. SCAQMD Rule 403 is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. SCAQMD Rule 1113 requires manufacturers, distributors, and end-users of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories. Rule 201 requires a "Permit to Construct" prior to the installation of any equipment â€œthe use of which may cause the issuance of air contaminants . . .", such as gasoline dispensers. Rule 1401 requires new source review of any new, relocated, or modified permit units that emit toxic air contaminants (TACs), including gasoline dispensers. The rule establishes allowable risks for permit units requiring air quality permits. As such, the Proposed Project meets this consistency criterion.

c) Would the project be consistent with the land use planning strategies set forth by SCAQMD air quality planning efforts?

The AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. The Proposed Project is consistent with the land use designation and development density presented in the City's General Plan and therefore, would not exceed the population or job growth projections used by the SCAQMD to develop the AQMP.

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of a project on air quality. The Proposed Project would not result in a long-term impact on the region's ability to meet state and federal air quality standards. The Proposed Project's long-term influence would also be consistent with the goals and policies of the SCAQMD's 2016 AQMP.

The Project would be consistent with the emission-reduction goals of the 2016 AQMP. Impacts would be less than significant, and no mitigation is required.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

Response:

By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's individual emissions exceed its identified significance thresholds, the project would be cumulatively considerable. Projects that do not exceed significance thresholds would not be considered cumulative considerable.

A portion of the Proposed Project's air quality impacts are attributable to construction activities. The majority of the long-term air quality impacts would be due to the operation of motor vehicles traveling to and from the Project Area as well as fueling activities. For purposes of impact assessment, air quality impacts have been separated into construction impacts and operational impacts.

Regional Construction Significance Analysis

Construction-generated emissions are temporary and short-term but have the potential to represent a significant air quality impact. Three basic sources of short-term emissions will be generated through construction of the Proposed Project: operation of the construction vehicles (i.e., excavators, trenchers, dump trucks), the creation of fugitive dust during clearing and grading, and the use of asphalt or other oil-based substances during paving activities. Construction activities such as excavation and grading operations, construction vehicle traffic, and wind blowing over exposed soils would generate exhaust emissions and fugitive PM emissions that affect local air quality at various times during construction. Effects would be variable depending on the weather, soil conditions, the amount of activity taking place, and the nature of dust control efforts. The dry climate of the area during the summer months creates a high potential for dust generation. Construction activities would be subject to SCAQMD Rule 403, which requires taking reasonable precautions to prevent the emissions of fugitive dust, such as using water or chemicals, where possible, for control of dust during the clearing of land and other construction activities.

Construction-generated emissions associated with the Proposed Project were calculated using the CARB-approved California Emissions Estimator Model (CalEEMod), version 2016.3.2 computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. See Attachment A for more information regarding the construction assumptions, including construction equipment and duration, used in this analysis.

Predicted maximum daily construction-generated emissions for the Proposed Project are summarized in Table III-1. Construction-generated emissions are short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Table III-1. Construction-Related Emissions (Regional Significance Analysis)

Construction Year	Pollutant (pounds per day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Construction 2021	3.21	28.87	20.06	0.04	3.37	2.29
Construction 2022	7.21	12.96	13.17	0.02	0.74	0.61
SCAQMD Regional Significance Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceeds SCAQMD Regional Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Sources: CalEEMod version 2016.3.2. Refer to Attachment A for Model Data Outputs.
Notes: Emission reduction/credits for construction emissions are applied based on the required implementation of SCAQMD Rule 403. The specific Rule 403 measures applied in CalEEMod include the following: sweeping/cleaning adjacent roadway access areas daily; washing equipment tires before leaving the construction site; water exposed surfaces three times daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD California Environmental Quality Act (CEQA) Handbook (Tables XI-A through XI-E) were applied.

As shown in Table III-1, emissions generated during Proposed Project construction would not exceed the SCAQMD's regional thresholds of significance. Therefore, criteria pollutant emissions generated during Project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard. A less than significant impact would occur as a result of construction of the Proposed Project.

Localized Construction Significance Analysis

The nearest sensitive receptors to the Project's onsite improvements are residences located to the north and west with the closest being approximately 250 feet to the west of the Project area across Indian Hills Circle. The nearest sensitive receptor to the Projects offsite improvements is a residence located approximately 165 feet distant from the proposed expansion of Indian Hills Circle to connect with State Route 74. In order to identify localized, air toxic-related impacts to sensitive receptors, the SCAQMD recommends addressing Localized Significance Thresholds (LSTs) for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised

2008b]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific level proposed projects.

For this Project, the appropriate source receptor area (SRA) for the localized significance thresholds is the Perris Valley, SRA 24. LSTs apply to CO, NO_x, PM_{10}, and $PM_{2.5}$. As previously described, the SCAQMD has produced lookup tables for projects that disturb one , two, and five acres. The Proposed Project would disturb ±1.36 acres during construction. Thus, the LST threshold value for a one-acre site was employed from the LST lookup tables.

LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. The nearest sensitive receptors to construction activity, onsite or offsite, as a result of the Project is the residence located on Arapahoe Road approximately 165 feet distant from the proposed expansion of Indian Hills Circle (50.2 meters). Therefore, LSTs for receptors located at 50 meters were utilized in this analysis. The SCAQMD's methodology clearly states that "offsite mobile emissions from a project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "onsite" emissions outputs were considered. Table III-2 presents the results of localized emissions. The LSTs reflect a maximum disturbance of the entire site.

Table III-2. Construction-Related Emissions (Localized Significance Analysis)

Activity	Pollutant (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Site Preparation 2021	17.42	7.56	2.86	1.83
Grading 2021	14.33	6.33	2.41	1.55
Building Construction 2021	13.63	12.89	0.68	0.66
Building Construction 2022	12.50	12.72	0.58	0.56
Paving and Painting 2022	8.17	10.61	0.42	0.40
SCAQMD Localized Significance Threshold (1.0 acre of disturbance)	*148*	*887*	*12*	*4*
Exceeds SCAQMD Regional Threshold?	**No**	**No**	**No**	**No**

Sources: CalEEMod version 2016.3.2. Refer to Attachment A for Model Data Outputs.
Notes: Emission reduction/credits for construction emissions are applied based on the required implementation of SCAQMD Rule 403. The specific Rule 403 measures applied in CalEEMod include the following: sweeping/cleaning adjacent roadway access areas daily; washing equipment tires before leaving the construction site; water exposed surfaces three times daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied.

Table III-2 shows that the emissions of these pollutants on the peak day of construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, significant impacts would not occur concerning LSTs during construction activities. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative. The SCAQMD Environmental Justice Enhancement Initiative program seeks to ensure that everyone has the right to equal protection from air pollution. The Environmental Justice Program is divided into three categories, with the LST protocol promulgated under Category I: Further-Reduced Health Risk. Thus, the fact that onsite Project construction emissions would be generated at rates below the LSTs for NOx, CO, PM10, and PM2.5 demonstrates that the Project would likely not adversely impact the neighboring receptors in the vicinity of the Project. No mitigation is required.

Regional Operational Significance Analysis

Implementation of the Proposed Project would result in long-term operational emissions of criteria air pollutants such as PM_{10}, $PM_{2.5}$, CO, and SO_2 as well as ozone precursors such as ROG and NO_X. Project-generated increases in emissions would be predominantly associated with motor vehicle use. As previously described, operational air pollutant emissions were based on the Project site plans and the estimated traffic trip generation rates provided by K2 Traffic Engineering, Inc (2020). Long-term operational emissions attributable to the Proposed Project are identified in Table III-3 and compared to the operational significance thresholds promulgated by the SCAQMD.

Table III-3. Operational-Related Emissions (Regional Significance Analysis)

Emission Source	Pollutant (pounds per day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer Emissions						
Area	8.58	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.02	0.01	0.00	0.00	0.00
Mobile	2.93	19.03	15.46	0.06	3.12	0.86
Total:	**11.51**	**19.05**	**15.47**	**0.06**	**3.12**	**0.86**
SCAQMD Regional Significance Threshold	55	55	550	150	150	55
Exceeds SCAQMD Regional Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Winter Emissions						
Area	8.58	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.02	0.01	0.00	0.00	0.00
Mobile	2.39	18.55	15.46	0.05	3.12	0.86
Total:	**10.97**	**18.57**	**15.47**	**0.05**	**3.12**	**0.86**
SCAQMD Regional Significance Threshold	55	55	550	150	150	55
Exceeds SCAQMD Regional Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Sources: CalEEMod version 2016.3.2. Refer to Attachment A for Model Data Outputs.
Notes: Emissions projections account for a trip generation rate and fleet mix identified by K2 Traffic Engineering, Inc. (2020). Specifically, K2 Traffic Engineering, Inc. estimates the Project generation of 2,114 average vehicle trips daily. The traffic fleet mix defaults contained in the CalEEMod model are based on the average fleet mix of Riverside County.
Area source emissions for the gasoline station include ROG released from consumer products as well as gasoline vapor during dispensing activities. Gasoline vapor emissions are calculated based on an emission factor of 1.27 pounds of ROG per 1,000 gallons of gasoline dispensed (CAPCOA 1997) and the prediction of 2,400,000 gallons of gasoline dispensed annually as provided by the Project applicant [(2,400,000/1,000) x 1.27 = 3,048 pounds annually. 3,048/365) = 8.35 pounds daily].

As shown in Table III-3, the Proposed Project's emissions would not exceed any SCAQMD thresholds for any criteria air pollutants during operation.

The Riverside County portion of the SoCAB is listed as a nonattainment area for federal O_3 and $PM_{2.5}$ standards and is also a nonattainment area for the state standards for O_3, PM_{10}, and $PM_{2.5}$. O_3 is a health threat to persons who already suffer from respiratory diseases and can cause severe ear, nose and throat irritation and increases susceptibility to respiratory infections. Particulate matter can adversely affect the human respiratory system. As shown in Table III-3, the Proposed Project would result in increased emissions of the O_3 precursor pollutants ROG and NO_x, PM_{10}, and $PM_{2.5}$, however, the correlation between a project's emissions and increases in nonattainment days, or frequency or severity of related illnesses, cannot be accurately quantified. The overall strategy for reducing air pollution and related health effects in the SCAQMD is contained in the SCAQMD 2016 AQMP. The AQMP provides control measures that reduce emissions to attain federal ambient air quality standards by their applicable deadlines such as the application of available cleaner technologies, best management practices, incentive programs, as well as development and implementation of zero and near-zero technologies and control methods. The CEQA thresholds of significance established by the SCAQMD are designed to meet the objectives of the AQMP and in doing so achieve attainment status with state and federal standards. As noted above, the Proposed Project would increase the emission of these pollutants but would not exceed the thresholds of significance established by the SCAQMD for purposes of reducing air pollution and its deleterious health effects. A less than significant impact would occur as a result of operation of the Proposed Project. No mitigation is required.

Localized Operational Significance Analysis

According to the SCAQMD localized significance threshold methodology, LSTs would apply to the operational phase of a proposed project only if the project includes stationary sources (e.g., smokestacks) or attracts heavy-duty trucks that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). The Proposed Project does not include such uses. While the Proposed Project does propose gasoline dispensers, a source of the TAC, benzene, the SCAQMD LST protocol does not address this pollutant. Therefore, in the case of the Proposed Project, the operational phase LST protocol does not

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
need to be applied. Therefore, significant impacts would not occur concerning LSTs during operational activities. A discussion of Project benzene-related impacts is discussed below.				
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

Response:

Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The nearest sensitive receptors to the Project's onsite construction activities are residences located to the north and west with the closest located approximately 250 feet away. The nearest sensitive receptor to the Project's offsite improvements is a residence located on Arapahoe Road approximately 165 away from the proposed expansion of Indian Hills Circle.

Construction-Generated Air Contaminants

Construction-related activities would result in temporary, short-term Proposed Project-generated emissions of diesel particulate matter (DPM), ROG, NO_x, CO, and PM_{10} from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g., clearing, grading); soil hauling truck traffic; paving; and other miscellaneous activities. The portion of the SoCAB which encompasses the Project Area is designated as a nonattainment area for federal O_3 and $PM_{2.5}$ standards and is also a nonattainment area for the state standards for O_3, PM_{10}, and $PM_{2.5}$ (CARB 2019). Thus, existing O_3, PM_{10}, and $PM_{2.5}$ levels in the SoCAB are at unhealthy levels during certain periods. However, as shown in Table III-1 and Table III-3 the Proposed Project would not exceed SCAQMD regional or localized significance thresholds for emissions.

The health effects associated with O_3 are generally associated with reduced lung function. Because the Proposed Project would not involve construction activities that would result in O_3 precursor emissions (ROG or NOx) in excess of the SCAQMD thresholds, the Proposed Project is not anticipated to substantially contribute to regional O_3 concentrations and the associated health impacts.

CO tends to be a localized impact associated with congested intersections. In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions. The Project would not involve construction activities that would result in CO emissions in excess of the SCAQMD thresholds. Thus, the Proposed Project's CO emissions would not contribute to the health effects associated with this pollutant.

Particulate matter (PM_{10} and $PM_{2.5}$) contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Particulate matter exposure has been linked to a variety of problems, including premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms such as irritation of the airways, coughing, or difficulty breathing. For construction activity, DPM is the primary TAC of concern. DPM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances. Diesel exhaust is a complex mixture of particles and gases produced when an engine burns diesel fuel. DPM is a concern because it causes lung cancer; many compounds found in diesel exhaust are carcinogenic. DPM poses the greatest health risk among the TACs; due to their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung. Based on the emission modeling conducted, the maximum onsite construction-related daily emissions of exhaust $PM_{2.5}$, considered a surrogate for DPM, would be 1.25 pounds/day during construction in the year 2021 and 0.57 pounds/day during construction in 2022 (see Attachment A). ($PM_{2.5}$ exhaust is considered a surrogate for DPM because more than 90 percent of DPM is less than 1 microgram in diameter and therefore is a subset of particulate matter under 2.5 microns in diameter (i.e., $PM_{2.5}$). Most $PM_{2.5}$ derives from combustion, such as use of gasoline and diesel fuels by motor vehicles). As with O_3 and NO_x, the Proposed Project would not generate emissions of PM_{10} or $PM_{2.5}$ that would exceed the SCAQMD's thresholds. Additionally, construction activities associated with the Project would be required to comply with SCAQMD Rule 403, which requires taking reasonable precautions to prevent the emissions

of fugitive dust, such as using water or chemicals, where possible. Accordingly, the Proposed Project's PM_{10} and $PM_{2.5}$ emissions are not expected to cause any increase in related regional health effects for these pollutants.

In summary, Project construction would not result in a potentially significant contribution to regional concentrations of nonattainment pollutants and would not result in a significant contribution to the adverse health impacts associated with those pollutants.

Operational Air Contaminants

Cancer Risk

Operation of the Proposed Project would result in the development of sources of air toxins. Specifically, the Proposed Project would be a source of gasoline vapors such as benzene, methyl tertiary-butyl ether, toluene, and xylene. CARB identifies benzene as a TAC and is the primary TAC of concern associated with gas stations. Benzene is highly carcinogenic and occurs throughout California. According to the California Air Pollution Control Officers Association (CAPCOA), benzene is the most important substance driving cancer risk, while xylene, another air toxic associated with gasoline stations, is the only substance which is associated with acute adverse health effects (CAPCOA 1997). According to CAPCOA, not until the benzene emissions are three orders of magnitude above the rate of an increase of 10 per million cancer risk, do the emissions of xylene begin to cause acute adverse health effects. According to SCAQMD's 2015 Risk Assessment Procedures for Rules 1401, 1401.1, & 212, benzene is the TAC which drives potential health risk, accounting for 87 percent of cancer risk from gasoline vapors. Benzene also has non-cancer health effects. Furthermore, a review of SCAQMD's 2015 Risk Assessment Procedures for Rules 1401, 1401.1, & 212 shows that benzene constitutes more than three to four times the weight of gasoline than ethylbenzene and naphthalene, respectively. The majority of benzene emitted in California comes from motor vehicles, including evaporative leakage and unburned fuel exhaust.

Gasoline vapors, including benzene, are released during the filling of stationary underground storage tanks and during the transfer from those underground tanks to individual vehicles. As the Project is proposing to dispense gasoline, the cancer risk at nearby land uses was calculated using the SCAQMD Risk Tool (Attachment B). The Risk Tool is used by the SCAQMD and CAPCOA to calculate the cancer risk per 10 million people based on SRA, location of the storage tanks, annual throughput, and distance to nearby receptors.

The proposed underground storage tanks and fueling canopy will be located approximately 360 feet (109.7 meters) from the nearest residence and approximately 201 feet (61.2 meters) from the nearest commercial land use. As previously mentioned, the project site is located in Perris Valley SRA and is anticipating an annual throughput of 2.4 million gallons per year. Based on this information it is calculated, using the SCAQMD Risk Tool, that the cancer risk for the Proposed Project is calculated at an increase of 0.98 persons per one million at the nearby residential land uses and an increase of 0.20 persons for the commercial land use. Both of these values are under the SCAQMD threshold of 10 per 1 million.

Additionally, the SCAQMD has stringent requirements for the control of gasoline vapor emissions from gasoline-dispensing facilities. SCAQMD Rule 461, Gasoline Transfer and Dispensing, seeks to limit emissions of organic compounds from gasoline dispensing facilities. Rule 461 prohibits the transfer or allowance of the transfer of gasoline into stationary tanks at a gasoline dispensing facility unless a CARB-certified Phase I vapor recovery system is used, and further prohibits the transfer or allowance of the transfer of gasoline from stationary tanks into motor vehicle fuel tanks at a gasoline dispensing facility unless a CARB-certified Phase II vapor recovery system is used during each transfer. Vapor recovery systems collect gasoline vapors that would otherwise escape into the air during bulk fuel delivery (Phase I) or fuel storage and vehicle refueling (Phase II). Phase I vapor recovery system components include the couplers that connect tanker trucks to the underground tanks, spill containment drain valves, overfill prevention devices, and vent pressure/vacuum valves. Phase II vapor recovery system components include gasoline dispensers, nozzles, piping, break away hoses, face plates, vapor processors, and system monitors. Rule 461 also requires fuel storage tanks to be equipped with a permanent submerged fill pipe tank that prevents the escape of gasoline vapors. In addition, all gasoline must be stored underground with valves installed on the tank vent pipes to further control gasoline emissions.

Gasoline dispensing facilities are also regulated by SCAQMD Rule 1401, *New Source Review of Toxic Air Contaminants*, which provides for the review of TAC emissions in order to evaluate potential public exposure and health risk, to mitigate potentially significant health risks resulting from these exposures, and to provide net health risk benefits by improving the level of control when existing sources are modified or replaced. Pursuant to SCAQMD Rule 1401, stationary sources having the potential to emit TACs, including gas stations, are required to obtain permits from the SCAQMD. Permits may be granted to these operations provided they are operated in accordance with applicable SCAQMD rules and regulations. The SCAQMD's permitting procedures require substantial control of emissions, and permits are not issued unless TAC risk screening or TAC risk assessment can show that risks are not significant. The SCAQMD may impose limits on annual throughput to ensure risks are within acceptable limits. (In addition, California has statewide limits on the benzene content in gasoline, which greatly reduces the toxic potential of gasoline emissions).

Naturally Occurring Asbestos

Another potential air quality issue associated with construction-related activities is the airborne entrainment of asbestos due to the disturbance of naturally-occurring asbestos-containing soils. The Proposed Project is not located within an area designated by the State of California as likely to contain naturally-occurring asbestos (Department of Conservation [DOC] 2000). As a result, construction-related activities would not be anticipated to result in increased exposure of sensitive land uses to asbestos.

Carbon Monoxide Hot Spots

It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when idling at intersections. Concentrations of CO are a direct function of the number of vehicles, length of delay, and traffic flow conditions. Under certain meteorological conditions, CO concentrations close to congested intersections that experience high levels of traffic and elevated background concentrations may reach unhealthy levels, affecting nearby sensitive receptors. Given the high traffic volume potential, areas of high CO concentrations, or "hot spots," are typically associated with intersections that are projected to operate at unacceptable levels of service during the peak commute hours. It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. However, transport of this criteria pollutant is extremely limited, and CO disperses rapidly with distance from the source under normal meteorological conditions. Furthermore, vehicle emissions standards have become increasingly more stringent in the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SoCAB is now designated as attainment. Detailed modeling of Project-specific CO "hot spots" is not necessary and thus this potential impact is addressed qualitatively.

A CO "hot spot" would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. The analysis prepared for CO attainment in the SCAQMD's *1992 Federal Attainment Plan for Carbon Monoxide* in Los Angeles County and a Modeling and Attainment Demonstration prepared by the SCAQMD as part of the 2003 AQMP can be used to demonstrate the potential for CO exceedances of these standards. The SCAQMD conducted a CO hot spot analysis as part of the 1992 CO Federal Attainment Plan at four busy intersections in Los Angeles County during the peak morning and afternoon time periods. The intersections evaluated included Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection evaluated was at Wilshire Boulevard and Veteran Avenue, which has a traffic volume of approximately 100,000 vehicles per day. Despite this level of traffic, the CO analysis concluded that there was no violation of CO standards (SCAQMD 1992). In order to establish a more accurate record of baseline CO concentrations affecting the SoCAB, a CO "hot spot" analysis was conducted in 2003 at the same four busy intersections in Los Angeles at the peak morning and afternoon time periods. This "hot spot" analysis did not predict any violation of CO standards. The highest one-hour concentration was measured at 4.6 ppm at Wilshire Boulevard and Veteran Avenue and the highest eight-hour concentration was measured at 8.4 ppm at Long Beach Boulevard and Imperial Highway. Thus, there was no violation of CO standards.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

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

The Proposed Project is anticipated to result in 2,114 daily traffic (K2 Traffic Engineering, Inc. 2020). Thus, the Proposed Project would not generate traffic volumes at any intersection of more than 100,000 vehicles per day (or 44,000 vehicles per day) and there is no likelihood of the Project traffic exceeding CO values.

The impact is less than significant. No mitigation is required.

d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

Response:

Typically, odors are regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).

With respect to odors, the human nose is the sole sensing device. The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals have the ability to smell minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; in fact, an odor that is offensive to one person (e.g., from a fast-food restaurant) may be perfectly acceptable to another. It is also important to note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity.

Quality and intensity are two properties present in any odor. The quality of an odor indicates the nature of the smell experience. For instance, if a person describes an odor as flowery or sweet, then the person is describing the quality of the odor. Intensity refers to the strength of the odor. For example, a person may use the word "strong" to describe the intensity of an odor. Odor intensity depends on the odorant concentration in the air. When an odorous sample is progressively diluted, the odorant concentration decreases. As this occurs, the odor intensity weakens and eventually becomes so low that the detection or recognition of the odor is quite difficult. At some point during dilution, the concentration of the odorant reaches a detection threshold. An odorant concentration below the detection threshold means that the concentration in the air is not detectable by the average human.

Construction

During construction, the Proposed Project presents the potential for generation of objectionable odors in the form of diesel exhaust in the immediate vicinity of the site. However, these emissions are short-term in nature and will rapidly dissipate and be diluted by the atmosphere downwind of the emission sources. Additionally, odors would be localized and generally confined to the construction area. Therefore, construction odors would not adversely affect a substantial number of people to odor emissions.

Operations

The Project Area could be considered a source of unpleasant odors by some given its proposed use as a gasoline dispensing station; however, according to the SCAQMD, land uses commonly considered to be potential sources of obnoxious odorous emissions include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The proposed Project does not include any uses identified by the SCAQMD as being associated with odors. Additionally, the SCAQMD has stringent requirements for the control of gasoline vapor emissions from gasoline-dispensing facilities as articulated in SCAQMD Rule 461.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Adherence to this rule would ensure a substantial number of people are not adversely affected by operational odor emissions. Therefore, a less than significant impact would occur.

Sources:

1. City of Perris General Plan
   - Conservation Element (adopted 2005, amended 2008)
2. Title 7 – Health and Welfare of the Perris Municipal Code
   - Chapter 7.04 – Nuisances
   - Chapter 7.34 – Noise Control
3. Title 10 – Vehicles and Traffic of the Perris Municipal Code
   - Chapter 10.42 – Parking Restrictions on Commercial and Other Vehicles
     - Section 10.42.040 – Permit Conditions
4. CAPCOA. 1997. Gasoline Service Station Industrywide Risk Assessment Guidelines.
   - 2017. California Emissions Estimator Model (CalEEMod), version 2016.3.2.
5. SCAQMD
   - 2003. Air Quality Management Plan.
   - 1992. 1992 Federal Attainment Plan for Carbon Monoxide.
6. Department of Conservation (DOC). 2000. A General Location Guide for Ultramafic Rocks in California-Areas More Likely to Contain Naturally Occurring Asbestos. Available at https://ww2.arb.ca.gov/sites/default/files/classic//toxics/asbestos/ofr_2000-019.pdf.
7. ECORP Consulting, Inc. (ECORP). 2020. Air Quality and Greenhouse Gas Assessment, Go Fresh Gas Station Perris.
8. K2 Traffic Engineering Inc. 2020. Traffic Impact Study, Go Fresh Gas Station at Southwest Corner of SR-74 and Navajo Road, Perris.
9. 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy. Adopted April 2016. Accessed August 2021. http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.

IV. BIOLOGICAL RESOURCES
– Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, 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?	☐	☒	☐	☐

Response:

A habitat assessment report, including a biological assessment was completed for the Proposed Project by Pacific Southwest Biological Services Inc. (PSBS) in 2019 (PSBS 2019) (Attachment C). The results of this assessment are summarized below.

Special Status Plants

No special-status plant species were detected within the Project Area. The Project Area includes mainly non-native grassland and disturbed habitat. The observed 50 species of flora is dominated by the relatively high number of non-native species occupying the Project Area. Vegetation types include Riversidian sage scrub, non-native grassland, urban/disturbed, disturbed habitat, and southern willow scrub (PSBS 2019). No impacts to special-status plant species are anticipated.

Special Status Wildlife

The Project Area is surrounded by city streets servicing a commercial area and a state highway and habitat types within the Project Area includes mainly non-native grassland and disturbed habitat. The wildlife habitat quality in the Project Area is low because of the extensive infestation of non-native weeds. Only the large

rock outcrops on the upper, southern side of the Project Area provides potential habitat. During the field survey conducted as part of the biological assessment thirteen species of animals were detected in the Project Area, including one reptile, ten avian species, and two mammals. No special-status species wildlife species were observed.

Burrowing Owl

The Project Area is within a Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) burrowing owl survey area. Protocol surveys for burrowing owl were completed in the Project Area in 2019. Due to the undeveloped nature of the upland, southern area, this area of the property was considered potential burrowing owl habitat. However, no areas of burrows, scat, feeding debris or regurgitated pellets were identified. The site does not provide high quality burrowing owl habitat, as indicated by the absence of burrows, berms, or proximity to suitable foraging habitat. Further, no ground squirrel activity was observed in the Project Area (PSBS 2019). No impact would occur. No mitigation is required.

Nesting Birds

The vegetation present on the site can provide habitat for nesting birds that are protected by the United States Fish and Wildlife Service (USFWS) Migratory Bird Treaty Act of 1918; therefore, any ground-disturbing activities should be conducted outside the bird nesting season (generally recognized as February 15 to September 1). Should there be a need to conduct ground disturbance during the nesting season, a nesting bird clearance survey should be conducted by a qualified biologist no more than 30 days prior to avoid take of nesting birds. Mitigation Measure **BIO-1**, identified below, would reduce impacts to a less than significant level.

BIO-1: Vegetation clearing and preliminary ground-disturbance work shall be completed outside of bird breeding season (typically set as February 15 through September 1). In the event that initial groundwork cannot be conducted outside the bird breeding season, nesting bird clearance surveys shall be conducted by a qualified biologist no more than 3 days prior to any disturbance to avoid take of nesting birds. Should nesting birds be found, an exclusionary buffer shall be established by the biologist. The buffer may be up to 500 feet in diameter depending on the species of nesting bird found. This buffer shall be clearly marked in the field by construction personnel under guidance of the biologist, and construction or clearing shall not be conducted within this zone until the biologist determines that the young have fledged or the nest is no longer active.

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?	☐	☒	☐	☐

Response:

As previously discussed, the Project Area is disturbed and dominated by non-native grassland. The Project Area contains riparian/riverine habitat along the flow-through drainage channel within the Project Area. The drainage channel shows a weak bed and bank topography along its length, and likely only flows during and immediately after storm events. The drainage exits the property through a 12-inch corrugated steel pipe culvert at the corner of Navajo Road and SR-74. The principal structural element of the drainage feature is arroyo will (*Salix lasiolepis*), black willow (*Salix gooddingii*), and mule-fat (*Baccharis salicifolia*). During the biological resources assessment prepared by PSBS, the site was assessed for Narrow Endemic Plan Species and none were observed primarily due to a lack of appropriate soil characteristics and vernal pool habitat. Mitigation Measure **BIO-2**, identified below, would require mitigation to offset the permanent impacts to MSHCP Riparian/Riverine habitat. Adherence to Mitigation Measure **BIO-1** would reduce impacts to a less than significant level.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
BIO-2: Project-related permanent impacts to MSHCP Riparian/Riverine habitat shall be mitigated at a mitigation-to-impact ratio of 2:1. Impacts shall be offset by participation in an in-lieu fee program, to be paid by the applicant, with the Riverside-Corona Resource Conservation District.				
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?	☐	☐	☐	☒

Response:

The drainage feature within the Project Area does not satisfy the three requisite criteria for jurisdictional wetlands and, therefore, would be considered non-wetlands, as defined by the United States Army Corps of Engineers (USACE). There are no marshes, vernal pools, or coastal areas within the Project Area. As no wetland waters of the U.S. will be affected, no impact related to this issue would occur. No mitigation is required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with an established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒

Response:

The Project Area is disturbed and relatively isolated by the surrounding developed uses. The Project Area provides no corridor function due to the presence of the surrounding development with major highways and arterial roadways. No impact would occur, and no mitigation is required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

Response:

The City of Perris Municipal Code Chapter 19.71 Urban Forestry Establishment and Care includes a tree protection policy to preserve and protect the City's urban forest canopy. These trees include all public and some private trees that contribute to the City's urban canopy cover and do not fall into the category of hazardous or nuisance trees (Municipal Code 1972, § 19.71.050). There are no trees on the Project Site that would be considered a protected public or private tree, therefore, the Proposed Project would be consistent with local ordinances. No impact would occur, and no mitigation is required.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or another approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

Response:

The Project Area is within the Western Riverside County MSHCP (WRCMSHCP) Plan Area and must comply with applicable sections of the MSHCP as well as pay the applicable MSHCP Development Mitigation Fee. The Project Area is not within criteria cell groups of the MSHCP.

As described above, in Checklist Response IV (a), the Project Site does not contain the habitat types described for conservation in the MSHCP. A habitat assessment and focused burrow survey for burrowing owl (*Athene cunicularia*), a California species of special concern, and MSHCP additional survey species (MSHCP Section 6.3.2) were completed. As described above, in Checklist Response IV (a), while the project site contains suitable habitat nesting birds that are protected by the USFWS Migratory Bird Treaty Act of 1918, implementation of Mitigation Measure **BIO-1** would reduce impacts to less than significant. As described above in Checklist Response IV (b), the project is anticipated to impact Riverine areas. Impacts to Riverine Areas would be reduced to less than significant with implementation of Mitigation Measure **BIO-2**.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Stephens' Kangaroo Rat Habitat Conservation Plan

The Project Area is within the Stephens' Kangaroo Rat Habitat Conservation Plan boundary. With payment of the Stephens' Kangaroo Rat Habitat Conservation Plan Development Mitigation Fee, the Proposed Project would be consistent with the Stephens' Kangaroo Rat Habitat Conservation Plan. No impact would occur.

With implementation of Mitigation Measures **BIO-1** and **BIO-2,** the Project as planned is consistent with the applicable MSHCP requirements.

Sources:

1. City of Perris General Plan
   - Conservation Element (adopted 2005, amended 2008)
2. Title 19 – Zoning of the Perris Municipal Code
   - Section 19.71.050 – Tree Protection
3. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). Available at http://www.wrc-rca.org/about-rca/multiple-species-habitat-conservation-plan/.
4. Riverside County Habitat Conservation Agency (RCHCA). Stephens' Kangaroo Rat Habitat Conservation Plan (SKRHCP), Governing Documents. Available at https://www.rchca.us/155/Governing-Documents.
5. Pacific Southwest Biological Services, Inc. 2019. Habitat Assessment Report – Go Fresh Gas Station and Car Wash, Indian Hills Circle at Tomahawk Road, Perris, Riverside County, California. July 2019.

V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐

Response:

A Phase I Cultural Resources Survey was completed for the Proposed Project in 2019 by Brian F. Smith and Associates, Inc. (BFSA) (BFSA 2019) (Attachment D). As part of the study, a cultural resources records search was completed at the Eastern Information Center (EIC) at the University of California at Riverside (UCR) to identify any previously recorded cultural resources or previous archaeological studies within a one-mile radius of the Project Area. The EIC records search did not indicate that any resources have been recorded within the Project Area and no previous studies have addressed the property. However, there are a large number of historic resources recorded near the property, as well as prehistoric sites which are located on similar terrain near the subject property. The EIC records search results indicated that 24 cultural resource studies are recorded within a one-mile radius of the Project Area. A Sacred Lands Files (SLF) search from the Native American Heritage Commission (NAHC) was also requested, which did not indicate the presence of any Native American sacred sites or locations of religious or ceremonial importance within the Project.

An archaeological survey of the property was conducted on July 8, 2019. Based on the results of the records search and literature review, there is potential for archaeological resources to be located within the project. No cultural resources were discovered on the property during the field survey. The property was moderately to severely surficially disturbed is relevant to the consideration of cultural resources being present within the Project Area. When parcels are cleared, disked, or otherwise disturbed, evidence of surface artifact scatters is lost. Therefore, whether or not cultural resources have ever existed on the Go Fresh Gas Project is unclear and the current status of the property appears to have affected the potential to discover any surface scatters of artifacts. Although this archaeological investigation did not identify any evidence of this past transhumance across the property, prehistoric resources are located in close proximity, and there still remains potential for unobserved buried resources that may be exposed during project construction (BFSA 2019).

As there still remains a possibility of buried cultural resources within the Project Area, it is recommended that all earthwork required to develop the property be monitored by a qualified archaeologist and a Native American representative. If previously unrecorded historical resources are encountered during construction that could potentially be affected, implementation of Mitigation Measures **CUL-1** through **CUL-9** would reduce impacts to less than significant.

Mitigation Measure:

CUL-1: Prior to issuance of a grading permit, the applicant shall provide written verification in the form of a letter from the project archaeologist to the lead agency stating that a certified archaeologist has been retained to implement the monitoring program.

CUL-2: The project applicant shall provide Native American monitoring during grading. The Native American monitor shall work in concert with the archaeological monitor to observe ground disturbances and search for cultural materials.

CUL-3: The certified archaeologist shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program.

CUL-4: During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and tribal representative shall be on-site, as determined by the consulting archaeologist, to perform periodic inspections of the excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The consulting archaeologist shall have the authority to modify the monitoring program if the potential for cultural resources appears to be less than anticipated.

CUL-5: Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed.

CUL-6: In the event that previously unidentified cultural resources are discovered, the archaeologist shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. The archaeologist shall contact the lead agency at the time of discovery. The archaeologist, in consultation with the lead agency, shall determine the significance of the discovered resources. The lead agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the lead agency before being carried out using professional archaeological methods. If any human bones are discovered, the county coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains.

CUL-7: Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The project archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis.

CUL-8: All cultural material collected during the grading monitoring program shall be processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.

CUL-9: A report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the lead agency prior to the issuance of any building permits. The report will include DPR Primary and Archaeological Site Forms.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐

Response:

No archaeological resources have been previously recorded in the Project Area and none were recorded during the field survey (BFSA 2019). However, there remains the possibility that unrecorded cultural resources could be present beneath the ground surface and, if present, may be exposed during project construction. With the implementation of Mitigation Measures **CUL-1** through **CUL-9** impacts to archaeological resources would be less than significant.

c) Disturb any human remains, including those interred outside of formally dedicated cemeteries?	☐	☒	☐	☐

Response:

Based on the records search from EIC, no formal cemeteries are located in or near the Project Area and no human remains have been reported in the Project vicinity. Most Native American human remains are found in prehistoric archaeological sites. No prehistoric archaeological sites have been recorded within the Project Site. Therefore, the Proposed Project has little potential to disturb human remains. If potential human remains are encountered during construction the Proposed Project would comply with CEQA Guidelines Section 15064.5(e) and Assembly Bill 2641 with the implementation of Mitigation Measure **CUL-6**. With the implementation of Mitigation Measure **CUL-6** impacts would be less than significant.

Sources:

1. City of Perris General Plan
   - Conservation Element (adopted 2005, amended 2008)
2. Brian F. Smith and Associates, Inc. 2019. A Phase I Cultural Resources Survey for the Go Fresh Gas Project, Perris, California. July 31, 3019.

VI. ENERGY – 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?	☐	☐	☒	☐

Response:

Electricity/Natural Gas Services

Southern California Edison (SCE) provides electrical services to the Project Area through state-regulated public utility contracts. Southern California Edison, the largest subsidiary of Edison International, is the primary electricity supply company for much of Southern California (City of Perris 2005c). It provides 14 million people with electricity across a service territory of approximately 50,000 square miles. The Southern California Gas Company provides natural gas services to the Project Area. Southern California Gas services approximately 21.6 million customers, spanning roughly 20,000 square miles of California.

Energy Consumption

Electricity use is measured in kilowatt-hours (kWh), and natural gas use is measured in therms. Vehicle fuel use is typically measured in gallons (e.g. of gasoline or diesel fuel), although energy use for electric vehicles is measured in kWh.

The electricity consumption associated with all non-residential uses in Riverside County from 2015 to 2019 is shown in Table VI-1. As indicated, the demand has remained constant since 2015.

Table VI-1. Non-Residential Electricity Consumption in Riverside County 2015-2019

Year	Non-Residential Electricity Consumption (kilowatt hours)
2019	8,183,222,878
2018	8,244,617,159
2017	8,234,637,414
2016	8,249,057,479
2015	8,187,145,456

Sources: CEC 2019

The natural gas consumption associated with all non-residential uses in Riverside County from 2015 to 2019 is shown in Table VI-2. As indicated, the demand has increased since 2015.

Table VI-2. Non-Residential Natural Gas Consumption in Riverside County 2015-2019

Year	Non-Residential Natural Gas Consumption (therms)
2019	148,215,491
2018	139,190,918
2017	139,166,211
2016	143,274,204
2015	128,307,248

Sources: CEC 2019

Automotive fuel consumption in Riverside County from 2016 to 2020 is shown in Table VI-3. Fuel consumption has slightly decreased between 2016 and 2020.

Table VI-3. Automotive Fuel Consumption in Riverside County 2016-2020

Year	Automotive Fuel Consumption (gallons)
2020	995,753,176
2019	1,004,639,936
2018	1,013,901,868
2017	1,022,096,262
2016	1,050,081,403

Sources: CARB 2017

The impact analysis focuses on sources of energy that are relevant to the Proposed Project: electricity, natural gas, the equipment-fuel necessary for Project construction, and the automotive fuel necessary for Project operations. Addressing energy impacts requires an agency to make a determination as to what constitutes a significant impact. There are no established thresholds of significance, statewide or locally, for what constitutes a wasteful, inefficient, and unnecessary consumption of energy for a proposed land use project. For the purpose of this analysis, the amount of electricity and natural gas estimated to be consumed by the Proposed Project is quantified and compared to that consumed by non-residential land uses in Riverside County. Similarly, the amount of fuel necessary for Project construction and operations is calculated and compared to that consumed in Riverside County.

Project increases in natural gas usage across Riverside County would also be negligible. The Project would adhere to all federal, state, and local requirements for energy efficiency, including the Title 24 standards. The Project would be required to comply with Title 24 building energy efficiency standards, which establish minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the Title 24 standards significantly reduces energy usage.

No unusual Project characteristics would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or the state. Construction contractors would purchase their own gasoline and diesel fuel from local suppliers and would judiciously use fuel supplies to minimize costs due to waste and subsequently maximize profits. Additionally, construction equipment fleet turnover and increasingly stringent state and federal regulations on engine efficiency combined with state regulations limiting engine idling times and requiring recycling of construction debris, would further reduce the amount of transportation fuel demand during Project construction. For these

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

reasons, it is expected that construction fuel consumption associated with the Proposed Project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature.

Project operation is estimated to consume approximately 190,580 gallons of automotive fuel per year, which would increase the annual countywide automotive fuel consumption by 0.0191 percent. The amount of operational fuel use was estimated using CARB's EMFAC2017 computer program, which provides projections for typical daily fuel usage in Riverside County (CARB 2017). This analysis conservatively assumes that all of the automobile trips projected to arrive at the Proposed Project during operations would be new to Riverside County. The Project would not result in excessive long-term operational automotive fuel consumption. Fuel consumption associated with vehicle trips generated by the Proposed Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Furthermore, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

For these reasons, this impact would be less than significant. No mitigation is required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Response:

The Project would be designed in a manner that is consistent with relevant energy conservation plans designed to encourage development that results in the efficient use of energy resources. Relevant energy conservation plans specific to Perris include the City's Climate Action Plan and General Plan, specifically General Plan Policies VIII.C, VIII.D, X.A, X.C, and XI.A. An overarching goal of these policy documents is to encourage energy conservation activities and programs throughout the City. The Project would not conflict or obstruct any local or state plans for renewable energy or energy efficiency. Thus, the Project would have no impact.

Sources:

1. City of Perris General Plan
   - Land Use Element (adopted 2005, amended 2016)
2. [CARB] California Air Resources Board. 2017. EMFAC2017 Web Database Emissions Inventory. https://www.arb.ca.gov/emfac/2017/
3. [CEC] California Energy Commission. 2019. California Energy Consumption Database. http://www.ecdms.energy.ca.gov/Default.aspx.

VII. GEOLOGY AND SOILS – 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 https://www.conservation.ca.gov/cgs/Documents/SP_042.pdf	☐	☐	☒	☐

Response:

The Project Area is located within the Peninsular Range Geomorphic Province of California, an area characterized by active northeast trending strike slip faults. The nearest faults to the Project Area are associated with the Elsinore fault system located approximately 9.7 miles from the Project. There are no known active fault traces in the Project vicinity. The Project Area is not within an Alquist-Priolo Earthquake Fault (Special Studies) Zone. No active faults with the potential for surface fault rupture are known to pass directly beneath the site. Therefore, the potential for surface rupture due to faulting occurring beneath the Project Area during the design life of the proposed development is considered low (SALEM 2019). Impacts would be less than significant. No mitigation is required.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Strong seismic ground shaking?	☐	☐	☒	☐

Response:

Tectonism of the region is dominated by the interaction of the East Pacific Plate and the North American Plate along a transform boundary. The Elsinore Fault Zone and San Jacinto/Casa Loma Fault Zones are located west and east of the Project Area, respectively. However, the Project Area is not located within an Earthquake Fault Zone. The seismic hazard most likely to impact the Project Area is ground shaking due to a large earthquake on one of the major active regional faults. The Proposed Project would be required to comply with current building codes and design standards which would reduce the risk of loss, injury, or death resulting from strong ground-shaking to a less than significant level. No mitigation is required.

iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

Response:

Soil liquefaction is a state of soil particles suspension caused by a complete loss of strength when the effective stress drops to zero. Liquefaction normally occurs under saturated conditions in soils such as sand in which the strength is purely frictional. Primary factors that trigger liquefaction are: moderate to strong ground shaking (seismic source), relatively clean, loose granular soils (primarily poorly graded sands and silty sands), and saturated soil conditions (shallow groundwater). Due to the increasing overburden pressure with depth, liquefaction of granular soils is generally limited to the upper 50 feet of a soil profile. However, liquefaction has occurred in soils other than clean sand.

Soils mapped for the Project Area are Cieneba rocky sandy loam (CkD2, 8 to 15 percent slopes eroded) and to the adjacent east, a small mapping of Hanford coarse sandy loam (HcD2, 8 to 15 percent slopes) associated with old alluvia fan formation in the region (PSBS 2019). The soils encountered within the depth of 17 feet in the Project Area consisted predominately of well graded sand with silt and gravel and silty sand with various amounts of gravel. The shallowest groundwater or perched water was encountered at a depth of 6 feet during this investigation. Low to very low cohesion strength is commonly associated with the sandy soil profile in the Project Area. A seismic hazard, which could cause damage to the proposed development during seismic shaking, is the post-liquefaction settlement of liquefied sands. The liquefaction evaluation indicated that the soils had a low potential for liquefaction under seismic condition (Salem 2019). Therefore, impacts would be less than significant, and no mitigation measures are required.

iv) Landslides?	☐	☐	☐	☒

Response:

The Project Area has a relatively flat topography. There are no known landslides at the site, nor is the site in the path of any known or potential landslides. The potential for a landslide is not considered to be a hazard for this Project (SALEM 2019). No impact would occur, and no mitigation is required.

b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

Response:

Surface soils in the Project Area consists of well graded sand with silt and gravel and silty sand with various amounts of gravel. Low to very low cohesion strength is commonly associated with the sandy soil profile in the Project Area. The Project Area is essentially flat, minimizing the potential for water erosion (SALEM 2019). Furthermore, construction of the Proposed Project would be required to comply with the Construction General Permit, either through a waiver or through preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). Best Management Practices (BMPs) are included as part of the SWPPP prepared for the Proposed Project and would be implemented to manage erosion and the loss of topsoil during construction-related activities. Post-construction, the Project Area would be completely covered by buildings, pavement, or landscaping, minimizing long-term wind erosion potential. Impacts would be less than significant, and no mitigation is required.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐

Response:

As discussed in Checklist Responses V a) (i) through (iv) of this section, hazards associated with liquefaction and landslides are not expected. 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. Due to the relatively flat site topography and low liquefaction potential, the likelihood of lateral spreading would be low (SALEM 2019). Based on the existence of well graded sand with silt and gravel and silty sand with various amounts of gravel in the Project Area, subsidence potential is considered minimal. Impacts would be less than significant, and no mitigation is required.

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?	☐	☐	☒	☐

Response:

As identified above, surface soils in the Project Area consists of well graded sand with silt and gravel and silty sand with various amounts of gravel. There is a low expansion potential within the Project Area. Impacts would be less than significant and no mitigation is required.

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?	☐	☐	☐	☒

Response:

The Proposed Project does not include septic tanks or alternative wastewater disposal systems. The Proposed Project would be served by the regional sewer system operated by Eastern Municipal Water District and infrastructure to serve the Proposed Project already exists in the area. No impact would occur, and no mitigation is required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Response:

The City of Perris is composed of Quaternary alluvium, which has developed as a result of erosion out of the batholithic and minor Aeolian deposition. Near the surface, this material is too young to exhibit fossils. However, it is possible that at depth beyond five feet below the modern ground surface, fossils may be found in certain areas in the City. The Project Area is located in an area with a low potential to contain significant fossil resources (City of Perris 2005a). Impacts would be less than significant, and no mitigation is required.

Sources:

1. City of Perris General Plan
   - Conservation Element (adopted 2005, amended 2008)
   - Safety Element (adopted 2005, amended 2016)
2. City of Perris Emergency Operations Plan (EOP), Part I: Basic Plan. 2013. Available at https://www.cityofperris.org/home/showdocument?id=362. May 2013.
3. City of Perris. 2013. Local Hazard Mitigation Plan, City of Perris. Available at https://www.cityofperris.org/home/showdocument?id=370. April 2013.
4. SALEM. 2019. Geotechnical Engineering Investigation, Proposed Gas Station and Carwash Highway 74 and Navajo Road Perris, California

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Response:

Greenhouse Gas (GHG) emissions are released as byproducts of fossil fuel combustion, waste disposal, energy use, land use changes, and other human activities. Prominent GHGs contributing to the GHG effect are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). While this is a naturally occurring process known as the greenhouse effect, human activities have accelerated the generation of GHGs beyond natural levels. The overabundance of GHGs in the atmosphere has led to an unexpected warming of the earth and has the potential to severely impact the earth's climate system.

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. CH_4 traps over 25 times more heat per molecule than CO_2, and N_2O absorbs 298 times more heat per molecule than CO_2. Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO_2e), which weigh each gas by its global warming potential. Expressing GHG emissions in CO_2e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted.

The Attachment G thresholds for GHG emissions do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA. With respect to GHG emissions, the CEQA Guidelines Section 15064.4(a) states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions resulting from a project. The CEQA Guidelines note that an agency has the discretion to either quantify a project's GHG emissions or rely on a "qualitative analysis or other performance-based standards." (14 CCR 15064.4(b)). A lead agency may use a "model or methodology" to estimate GHG emissions and has the discretion to select the model or methodology it considers "most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change." (14 CCR 15064.4(c)). Section 15064.4(b) provides that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment:

1. The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.

2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.

3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4(b)).

In addition, Section 15064.7(c) of the CEQA Guidelines specifies that "[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence" (14 CCR 15064.7(c)). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130(f)). As a note, the CEQA Guidelines were amended in response to Senate Bill 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation

program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions." Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies and/or other regulatory strategies to reduce GHG emissions.

The local air quality agency regulating the SoCAB is the SCAQMD, the regional air pollution control officer for the basin. To provide guidance to local lead agencies on determining significance for GHG emissions in CEQA documents, SCAQMD staff convened a GHG CEQA Significance Threshold Working Group. The Working Group was formed to assist the SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, a variety of city and county planning departments in the Basin, various utilities such as sanitation and power companies throughout the Basin, industry groups, and environmental and professional organizations. On October 8, 2008, the SCAQMD released the Draft AQMD Staff CEQA GHG Significance Thresholds. On September 28, 2010, SCAQMD Working Group Meeting #15 provided further guidance, including a numeric "bright-line" threshold of 3,000 metric tons of CO_2e annually and an efficiency-based threshold of 4.8 metric tons of CO_2e per service population (defined as the people that work, study, live, patronize and/or congregate in the Project Area) per year in 2020 and 3.0 metric tons of CO_2e per service population per year in 2035. The numeric bright line and efficiency-based thresholds were developed to be consistent with CEQA requirements for developing significance thresholds, are supported by substantial evidence, and provide guidance to CEQA practitioners and lead agencies with regard to determining whether GHG emissions from a proposed project are significant.

In *Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal. 4th 2014, 213, 221, 227, following its review of various potential GHG thresholds proposed in an academic study [Crockett, *Addressing the Significance of Greenhouse Gas Emissions: California's Search for Regulatory Certainty in an Uncertain World* (July 2011), 4 Golden Gate U. Envtl. L. J. 203], the California Supreme Court identified the use of numeric bright-line thresholds as a potential pathway for compliance with CEQA GHG requirements. The study found numeric bright line thresholds designed to determine when small projects were so small as to not cause a cumulatively considerable impact on global climate change was consistent with CEQA. Specifically, Public Resources Code section 21003(f) provides it is a policy of the state that "[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." The Supreme Court-reviewed study noted, "[s]ubjecting the smallest projects to the full panoply of CEQA requirements, even though the public benefit would be minimal, would not be consistent with implementing the statute in the most efficient, expeditious manner. Nor would it be consistent with applying lead agencies' scarce resources toward mitigating actual significant climate change impacts." (Crockett, *Addressing the Significance of Greenhouse Gas Emissions: California's Search for Regulatory Certainty in an Uncertain World* (July 2011), 4 Golden Gate U. Envtl. L. J. 203, 221, 227.)

The significance of the Proposed Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Proposed Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The City of Perris may set a project-specific threshold based on the context of each particular project, including using the SCAQMD Working Group expert recommendation. This standard is appropriate for this Project because it is in the same air quality basin that the experts analyzed. For the Proposed Project, the SCAQMD's 3,000 metric tons of CO_2e per year screening threshold is used as the significance threshold in addition to the qualitative thresholds of significance set forth below from Section VII of CEQA Guidelines Attachment E. The 3,000 metric tons of CO_2e per year screening threshold represents a 90 percent capture rate (i.e., this threshold captures projects that represent approximately 90 percent of GHG emissions from new sources). The 3,000 metric tons of CO_2e per year

value is typically used in defining small projects within this air basin that are considered less than significant because it represents less than one percent of future 2050 statewide GHG emissions target and the lead agency can provide more efficient implementation of CEQA by focusing its scarce resources on the top 90 percent. This threshold is correlated to the 90 percent capture rate for industrial projects within the air basin. Land use projects above the 3,000 metric tons of CO_2e per year level would fall within the percentage of largest projects that are worth mitigating without wasting scarce financial, governmental, physical, and social resources (Crockett 2011). As noted in the academic study, the fact that small projects below a numeric bright line threshold are not subject to CEQA-based mitigation, does not mean such small projects do not help the state achieve its climate change goals because even small projects participate in or comply with non-CEQA-based GHG reduction programs, such constructing development in accordance with statewide GHG-reducing energy efficiency building standards, called Cal Green or Title 24 energy-efficiency building standards (Crockett 2011).

Construction-Generated Greenhouse Gas Emissions

A potent source of GHG emissions associated with the Proposed Project would be combustion of fossil fuels during construction activities. The construction phase of the Proposed Project is temporary but would result in GHG emissions from the use of heavy construction equipment and construction-related vehicle trips.

Construction-related activities that would generate GHG emissions include worker commute trips, haul trucks carrying supplies and materials to and from the Project Area, and off-road construction equipment (e.g., dozers, loaders, excavators). Table VIII-1 illustrates the specific construction-generated GHG emissions that would result from construction of the Proposed Project. Once construction is complete, the generation of these GHG emissions would cease.

Table VIII-1. Construction-Related Greenhous Gas Emissions

Emission Source	CO_2e (Metric Tons/ Year)
Year 2021	144
Year 2022	88
Total Emissions	**232**

Sources: CalEEMod version 2016.3.2. Refer to Attachment A for Model Data Outputs.

As shown in Table VIII-1, Project construction would result in the generation of approximately 232 metric tons of CO_2e over the course of construction. Once construction is complete, the generation of these GHG emissions would cease. Consistent with SCAQMD recommendations, Project construction GHG emissions have been amortized of the expected life of the Project, which is considered to be 30 years per the SCAQMD. The amortized construction emissions are added to the annual average operational emissions.

Operational-Generated Greenhouse Gas Emissions

Operation of the Proposed Project would result in an increase in GHG emissions primarily associated with motor vehicle trips and onsite energy sources. Long-term operational GHG emissions attributed to the Proposed Project are identified in Table VIII-2.

Table VIII-2. Operational-Related Greenhous Gas Emissions

Emission Source	CO_2e (Metric Tons/ Year)
Construction Emissions (amortized over the 30-year life of the Project)	8
Area Source	0
Energy Source	82
Mobile Source	978
Solid Waste	13
Water	12
Total Emissions	**1,201**
SCAQMD Screening Threshold	*3,000*
Exceed SCAQMD Threshold?	**No**

Sources: CalEEMod version 2016.3.2. Refer to Attachment A for Model Data Outputs.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Noes: Emission projections predominately based on CalEEMod model defaults for Riverside County. Average daily vehicle trips provided by K2 Traffic Engineering, Inc. (2020).

As shown in Table VIII-2, operational-generated emissions would not exceed the SCAQMD's numeric bright-line threshold of 3,000 metric tons of CO_2e annually. SCAQMD thresholds were developed based on substantial evidence that such thresholds represent quantitative levels of GHG emissions, compliance with which means that the environmental impact of the GHG emissions will normally not be cumulatively considerable under CEQA. These thresholds were developed as part of the SCAQMD GHG CEQA Significance Threshold Working Group. The working group was formed to assist the SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the state OPR, CARB, the Attorney General's Office, a variety of city and county planning departments in the SoCAB, various utilities such as sanitation and power companies throughout the basin, industry groups, and environmental and professional organizations. The Project's impact would be less than significant and no mitigation is required

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?	☐	☐	☒	☐

Response:

The City of Perris Climate Action Plan (CAP) is a strategic planning document that identifies sources of GHG emissions within the subregion boundaries, presents current and future emission estimates, identifies a GHG reduction target for future years, and presents strategies, policies and actions to reduce emissions form the energy, transportation, waste, and wastewater sectors. As previously stated, the City's CAP is based on inventories and forecasts contained within the Western Riverside Council of Government (WRCOG) Subregional CAP. The GHG reduction strategies in the WRCOG document build on inventory results of GHG emissions by sector and by jurisdiction, including Perris.

Both the existing and the projected related GHG inventories in the City's CAP were derived based on the land use designations and associated designations defined in the City's General Plan. The Proposed Project is consistent with the land use designation and development density presented in the General Plan. As previously stated, the Project Area is designated by the City's General Plan as CC. The CC land use designation is intended for professional offices, department stores, discount stores, furniture/appliance outlets, home improvement centers, entertainment centers and subregional/ regional shopping centers. The Project is proposing an automobile gas station consisting of a convenience store, retail store, fuel canopy, underground storage tanks, and automated carwash. The Project is not proposing to amend the City General Plan and is consistent with all land use designations applied to the site. Additionally, the Project would not increase the number of people residing in the area. Since the Project is consistent with the General Plan it is consistent with the types, intensity, and patterns of land use envisioned for the site in the General Plan, and as a result, the Project would not conflict with the land use assumptions or exceed the population or job growth projections used by the City CAP.

Additionally, the Proposed Project is considered 'infill development' as it proposes to develop a property in a rapidly urbanizing area surrounded by predominately urban residential uses. As a result of proposing a mix of commercial land uses in an area devoid of such uses and surrounded heavily by residences, the Proposed Project can be identified for its "location efficiency". Location efficiency describes the location of the Proposed Project relative to the type of urban landscape its proposed to fit within. In general, compared to the statewide average, a project with location efficiency can realize automotive VMT reductions between 10 and 65 percent (CAPCOA 2017). The Project would locate complementary commercial land uses in close to proximity to existing offsite residential uses, thereby providing commercial and work options to the existing, nearby residents currently living near the Project Area. The location efficiency of the Project Area would result in synergistic benefits that would reduce vehicle trips and VMT compared to the statewide average and would result in corresponding reductions in transportation-related GHG emissions.

The Proposed Project would not conflict with an adopted plan, policy, or regulation pertaining to GHGs. This impact is less than significant and no mitigation is required.

Sources:

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

1. CAPCOA. 2017. California Emissions Estimator Model (CalEEMod), version 2016.3.2.
2. Crockett, Alexander G. 2011. Addressing the Significance of Greenhouse Gas Emissions Under CEQA: California's Search for Regulatory Certainty in an Uncertain World.
3. K2 Traffic Engineering Inc. 2020. Traffic Impact Study, Go Fresh Gas Station at Southwest Corner of SR-74 and Navajo Road, Perris.
4. City of Perris. 2016. Climate Action Plan. Available at https://www.cityofperris.org/Home/ShowDocument?id=12935. February 23, 2016.

IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

Response:

The construction and operational phases of the Proposed Project includes the transport, storage, and use of petroleum-based fuels, lubricants, pesticides, and other similar materials. The transport of hazardous materials by truck is regulated by federal safety standards under the jurisdiction of the U.S. Department of Transportation. Additionally, the implementation of BMPs stipulating proper storage of hazardous materials and vehicle refueling would be implemented during construction as part of the Storm Water Pollution Prevention Plan (SWPPP). Furthermore, a Leak Detection, Spill Contingency and Emergency Response Plan has been prepared for the Proposed Project. This plan addresses stormwater pollution prevention, hazardous waste management, and leak detection and fuel system spill prevention. All transport, handling, use, and disposal of substances such as petroleum products paints, and solvents related to the operation and maintenance of the Proposed Project would comply with all Federal, State, and local laws regulating management and use of hazardous materials. Therefore, the use of such material would not create a significant hazard to the public and impacts would be less than significant.

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?	☐	☐	☒	☐

Response:

The Proposed Project would develop an automobile gas station consisting of a convenience store, retail store, fuel canopy, underground storage tanks, and automated carwash. During construction some hazardous materials, such as diesel fuel, would be used. A SWPPP, listing BMPs to prevent construction pollutants and products from violating any water quality standard or waste discharge requirements would be prepared for the Proposed Project. The potential risk associated with accidental discharge during use and storage of equipment-related hazardous materials would be low since the handling of such materials would be addressed through the implementation of BMPs.

The Proposed Project would include four underground fuel storage tanks. The underground fuel storage tanks to be installed would be a double-walled, fiberglass tank with sensors in the interstitial space to alert the presence of any leaks. The tanks would be installed underground, which minimizes the likeliness of vehicular accidents damaging the tank and resulting in a release. Furthermore, a Leak Detection, Spill Contingency and Emergency Response Plan has been prepared for the Proposed Project. This plan addresses storm water pollution prevention, hazardous waste management, and leak detection and fuel system spill prevention. The Proposed Project will also be required to comply with the safety requirements of the Perris Fire Department, the Perris Municipal Code, and the California Health and Safety Code.

The Proposed Project would be subject to routine inspection by federal, state, and local regulatory agencies with jurisdiction over fuel-dispensing facilities. Hazardous materials regulations, which are codified in Titles 8, 22, and 26 of the California Code of Regulations (CCR), and their enabling legislation set forth in Chapter 6.95 of the California Health and Safety Code, were established at the state level to ensure compliance with federal regulations and to reduce the risk to human health and the environment from the routine use of hazardous substances. Protection against accidental spills and releases provided by this legislation

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
includes physical and mechanical controls of fueling operations, including automatic shutoff valves; requirements that fueling operations are contained on impervious surface areas; oil/water separators or physical barriers in catch basins or storm drains; vapor emissions controls; leak detection systems; and regular testing and inspection (California Health and Safety Code [CHSC] 2014). The Proposed Project would not create a significant hazard to the public. Impacts would be less than significant, and no mitigation is required.				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
Response: There are no schools within one-quarter mile of the Project Area. The closest schools to the Project Area include Park Avenue Elementary School and Perris Elementary School, both located approximately 0.4 mile to the east. Enchanted Hills Elementary School is located approximately 0.64 miles to the northwest of the Project Area. The Applicant would pay the City of Perris' Development Impact Fees. The City imposes development impact fees on development projects to lessen the impact on school facilities (City of Perris 2020). No impact would occur, and no mitigation is required.				
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?	☐	☐	☒	☐

Response:
 	
A search of the Department of Toxic Substances Control's (DTSC) Hazardous Waste and Substances Site List (Cortese List) and EnviroStor online database and the State Water Resources Control Board (SWRCB) GeoTracker online database was conducted for the Project Area (DTSC 2020a and 2020b; SWRCB 2020). The searches revealed one leaking underground storage tank (LUST) site located in the vicinity of the Navajo Road/I-74 intersection, including:
 	
• Circle K #340
  ○ Location: 650 Indian Circle Drive, Perris, CA 92570
  ○ Regional Board Case No.: 083303478T
  ○ Local Agency Case No.: 9915150
  ○ Site Type: LUST cleanup site
  ○ Status: Completed – case closed as of 4/28/2011
 	
The previously described LUST sites are located in areas adjacent to the Project Area and are not within the Project Site and have been remediated and closed under the direction and oversight of the Santa Ana Regional Water Quality Control Board. The Project is not located on a hazardous materials site and impacts would be less than significant. No mitigation is required.				

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 for people residing or working in the project area?	☐	☐	☐	☒
Response: The City of Perris has two airports within or near its City limits: March Air Reserve Base/Inland Port Airport (March ARB/IPA) and Perris Valley Airport. March ARB/IPA is located approximately 5.25 miles north of the Project Area. The Project Area is not located within an aircraft hazard zone. Perris Valley Airport is located approximately 1.68 miles southeast of the Project Area (City of Perris 2005b).				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The Project Area is located within Airport Compatibility Zone E of the March ARB/IPA Influence Area. Compatibility Zone E does not place restrictions on the density or types of uses allowed. Hazards to flight are prohibited. Hazards to flight include physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations. Land use development that may cause the attraction of birds to increase is also prohibited. Man-made features must be designed to avoid heightened attraction of birds (Riverside County ALUC 2014). The Project Area is not within the Perris Valley Airport's influence area (City of Perris 2005b). Because the Proposed Project would be developed within Zone E of the March ARB/IPA Influence Area where there are no restrictions on the type and density of use, the Project would not be a hazard to flight. No impact would occur, and no mitigation is required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

Response:

The Proposed Project would not have any direct effect on an adopted emergency response plan or emergency evacuation plan. The City's Emergency Operations Plan (EOP) and Emergency Management Program describes the preparation, response, recovery, and mitigation operations which discuss the operational policies and procedures that are used during emergencies (City of Perris 2013a). Project review process includes reviews by the City's fire and police departments for consideration of emergency access requirements. The Proposed Project's design would meet City standards for required emergency vehicle access and emergency egress of residents. Established City procedures including plan check, permit issuance, and construction inspection would ensure implementation of the Proposed Project is consistent with the approved design. No impact would occur, and no mitigation is required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Response:

The City of Perris has not had any wildfires in its district in some time. However, it still remains that areas are susceptible to wildfires in any time (City of Perris 2013b). The City has implemented weed abatement and brush clearance regulations to help reduce the threat of the spread of wildland fires within Perris and its sphere of influence. These regulations include a 30-foot brush clearance radius for all structures within the City, with a 150-foot radius brush clearance requirement for structures on hillsides. The Project Area is not located within a wildfire hazard area as identified in the City of Perris General Plan (City of Perris 2005b). No impact would occur, and no mitigation is required.

Sources:

1. City of Perris General Plan
   - Safety Element (adopted 2005, amended 2016)
     - Exhibit S-16: Wildfire Constraint Areas
2. March Air Reserve Base (MARB)/March Inland Port (MIP) Airport Land Use Compatibility Plan (ALUCP) on November 13, 2014, (http://www.rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700)
3. City of Perris Emergency Operations Plan (EOP), Part I: Basic Plan. 2013. Available at https://www.cityofperris.org/home/showdocument?id=362. May 2013.
4. City of Perris Local Hazard Mitigation Plan. April 2013. Available at https://www.cityofperris.org/home/showdocument?id=370.
   - Chapter 4 – Hazard Identification and Risk Assessment
     - 4.5 – Hazard Review and Summary
5. DTSC's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List). Available at https://dtsc.ca.gov/dtscs-cortese-list/. Accessed on August 11, 2021.
6. DTSC's EnviroStor. Available at https://www.envirostor.dtsc.ca.gov/public/. Accessed on August 11, 2021.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

7. SWRCB's GeoTracker. Available at https://geotracker.waterboards.ca.gov/. Accessed on August 11, 2021.
8. City of Perris. 2020. Development Impact Fees. Available at https://www.cityofperris.org/home/showpublisheddocument/13652/637606600455830000. July 1, 2020.

X. HYDROLOGY AND WATER QUALITY – Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

Response:

During construction of the Proposed Project water quality impacts could occur without proper controls. Soils loosened during grading, as well as spills of fluids or fuels from vehicles and equipment, if mobilized or transported offsite in overland flow, have the potential to degrade water quality. Because the area of disturbance affected by construction of the Proposed Project exceeds one acre, the Proposed Project would be subject to the requirements of the statewide National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (General Permit; Order 2009-0009-DWQ). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. During construction, to comply with the General Permit the applicant would be required to implement a SWPPP, which would include BMPs to prevent construction pollutants and products from violating any water quality standards or any waste discharge requirements. Impacts to surface or ground water quality during construction would be less than significant. No mitigation is required.

During operations the Proposed Project would include a stormwater drainage system. Stormwater originating in the Project Area would be conveyed to the existing storm drain system within Navajo Road. Impacts to surface or ground water quality during project operation would be less than significant. No mitigation is required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

Response:

The City's current supplies include imported water purchased from Metropolitan Water District (MWD), locally produced groundwater, and recycled water produced by the District's five Regional Water Reclamation Facilities (RWRFs). The Eastern Municipal Water District (EMWD) wells produce over 17,000 acre-feet per year of native groundwater for use by its customers. The majority of this supply is produced by subbasins in the Hemet and San Jacinto area and is used locally in the Perris valley. Slightly over 3,000 acre-feet per year are produced from the Perris and Perris South sub-basins. Commercial land uses in Perris presently place a relatively modest demand on the District's water resources. However, over time commercial development is expected to expand in the planning area, particularly along the I-215 corridor. Water usage associated with commercial development will also thereby expand.

EMWD's Urban Water Management Plan addresses reliability of its water supplies. The MWD has adopted a Water Surplus and Drought Management Plan (WSDMP) that recognizes the link between surpluses and shortages and integrates planned responses to both conditions. The WSDMP will also guide management of regional water supplies to achieve the reliability goals established in MWD's Integrated Resources Plan. Through effective implementation MWD expects to provide 100 percent reliability through 2025 even through a repeat of the worst drought (City of Perris 2005a).

The Proposed Project would include both pervious (open space, drainage easement, and landscape areas) and impervious (hardscapes, building footprints) surfaces. The Proposed Project's stormwater management system would convey stormwater originating in the Project Area to the existing storm drain system within Navajo Road. The Proposed Project will not substantially decrease groundwater supplies and

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
will not substantially interfere with groundwater recharge such that it will impede sustainable groundwater management of the basin. Impacts would be less than significant, and no mitigation is required.				
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 on- or off-site?	☐	☐	☒	☐
Response: The Proposed Project would require grading of the Project Area which would result in localized changes in discharge patterns, which could result in erosion and/or siltation. Erosion and/or siltation during construction would be minimized by implementation of BMPs included in the Proposed Project's SWPPP. Furthermore, the Proposed Project grading plan and stormwater management system has been designed by a registered civil engineer to meet City development standards and safely collect and convey runoff to existing storm drains on Navajo Road. The stormwater management system has been designed to reduce the erosion potential. The project would result in the conversion of permeable surfaces to impermeable surfaces, which would alter the current drainage pattern. Proposed drainage facilities would be designed and sized appropriately to accommodate the increase in stormwater runoff from the additional impermeable surfaces. While, the project would require modifications to the existing local drainage structures, it would not alter the existing drainage pattern of downstream areas or lead to downstream flooding. Impacts would be less than significant and no mitigation is required.				
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐
Response: The Proposed Project would include both pervious (open space, drainage easement, and landscape areas) and impervious (hardscapes, building footprints) surfaces. Developments of the property and surrounding area in the 1970s led to an increase of impermeable surfaces in the area and the introduction of urban runoff chiefly along Navajo Road. Introduction of the commercial center just to the west of the property further increased the amounts of impermeable surfaces contributing to the total urban runoff onto the property. Urban runoff along Navajo Road and other impermeable surfaces led to the growth of riparian plant species, including willows (*Salix* sp.). When SR-74 was upgraded in the 1970s, culverts were constructed to convey runoff from the property southwards. Currently, the property supports a flow -through drainage channel, considered to be ephemeral, that contains several willows along its path. The drainage exits the property through a 12-inch culvert at the corner of Navajo Road and SR-74 (ECORP 2021). Impervious surfaces would increase with implementation of the Proposed Project compared to existing conditions of the Project Area, which has the potential to increase the rate of surface runoff. The Proposed Project's stormwater runoff will be discharged from the Project Area onto the storm drain system within Navajo Road. As such, the potential for flooding on- or offsite is reduced. Impacts would be less than significant, and no mitigation is required.				
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?	☐	☐	☒	☐
Response: As previously discussed, during construction a SWPPP would be implemented. The SWPPP would include BMPs to prevent construction pollutants and products from violating any water quality standards or any waste discharge requirements. During project operations stormwater runoff would be managed by the Proposed Project's stormwater system, which was designed by a registered civil engineer to ensure that the system's components are sized to treat the runoff volumes that are anticipated for the post-development condition. Impacts would be less than significant, and no mitigation is required.				
iv) Impede or redirect flood flows?	☐	☐	☐	☒

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Response:

There are no streams or waterways on or near the Project Area. The Project Area is not within a flood zone as identified by the Federal Emergency Management Agency (FEMA) (FEMA 2020). No impact would occur, and no mitigation is required.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

Response:

The Project Area is not located within a known flood hazard zone (FEMA 2020; City of Perris 2005b). Additionally, the Project Area is located approximately 33 miles northeast of the Pacific Ocean and approximately 5.54 miles southwest of the Perris Reservoir. The Project Area is not located in the maximum dam inundation area for Perris Reservoir (City of Perris 2005b). Due to the distance to the Pacific Ocean and Perris Reservoir, the Project Area would not be subject to inundation from seiches or tsunamis. No impact would occur, and no mitigation is required.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Response:

The Proposed Project would comply with the City of Perris Municipal Code (14.22.030) general requirements for the statewide National Pollutant Discharge Elimination System (NPDES) stormwater permit for construction activity (Order 98-08 DWQ), and as such would prepare a SWPPP. The Project would not include the installation or use of groundwater wells; therefore, the Proposed Project would not interfere with any groundwater management or recharge plan. No impact would occur, and no mitigation is reqeuired.

Sources:

1. City of Perris General Plan
   - Conservation Element (adopted 2005, amended 2008)
   - Safety Element (adopted 2005, amended 2016)
     - Exhibit S-11: Planning Area 7 Flood Zones
     - Exhibit S-15: Dam Inundation Map
2. Title 14 – Water and Sewage of the Perris Municipal Code
   - Section 14.22 – Stormwater/Urban Runoff Management and Discharge Control
3. EMWD. Groundwater Reliability Plus, http://gwrplus.org/
4. EMWD. 2020 Urban Water Management Plan
5. FEMA. 2020. National Flood Hazard Layer FIRMette. Available at https://msc.fema.gov/arcgis/rest/directories/arcgisjobs/nfhl_print/mscprintb_gpserver/j56e65127fffd404ab53193ec1bd8c304/scratch/FIRMETTE_0c723936-1bad-4389-ad94-61063abb1010.pdf. October 2020.
6. ECORP Consulting, Inc. 2021. Aquatic Resources Assessment Memorandum, Go Fresh Gas Station Project. January 8, 2021.

XI. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?	☐	☐	☐	☒

Response:

The Project Area is surrounded by commercial and residential development to the north and west and SR-74 to the east and south with undeveloped land beyond. Development of the Project Area would not divide an established community. No impact would occur, and no mitigation is required.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Response:

The Project Area has a General Plan land use and zoning designation of Commercial Community. The primary focus of the Commercial Community land use designation is to provide property for business purposes, including, but not limited to, professional offices, department stores, discount stores, furniture/appliance outlet, home improvement centers, entertainment centers, and sub regional/regional shopping centers (City of Perris 2005c). The Proposed Project would develop an automobile gas station consisting of a convenience store, retail store, fuel canopy, underground storage tanks, and automated carwash, which is a consistent use with the Project Area's land use and zoning designation with a Conditional Use Permit. No significant environmental impact would occur with Project implementation and no mitigation is required.

Sources:

1. City of Perris General Plan
   - Land Use Element (adopted 2005, amended 2016)
     - Exhibit LU-1: Planning Areas
2. Title 19 – Zoning of the Perris Municipal Code
   - Chapter 19.38 – CC Zone

XII. MINERAL RESOURCES – 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?	☐	☐	☐	☒

Response:

The Surface Mining and Reclamation Act of 1975 (SMARA) encourages the production, conservation, and protection of the state's mineral resources. Public Resources Code (PRC) Section 2207 provides annual reporting requirements for all mines in the state, under which the State Mining and Geology Board is also granted authority and obligations (DOC 2021).

The Project Area is located in Mineral Resource Zone (MRZ) 3 under the Riverside County General Plan. The MRZ-3 classification is for areas where the available geologic information indicates that mineral deposits are likely to exist, however, the significance of the deposit is undetermined (Riverside County 2015). No mineral extraction activities are currently present on the Project Site or in the Project vicinity. Development of the Project Site would not result in the loss of availability of known mineral resources. No impact would occur, and no mitigation is required.

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?	☐	☐	☐	☒

Response:

As described above, the Project Area is located in Mineral Resource Zone (MRZ) 3 under the Riverside County General Plan. The MRZ-3 classification is for areas where the available geologic information indicates that mineral deposits are likely to exist, however, the significance of the deposit is undetermined (Riverside County 2015). The Proposed Project would not be located within or near a mineral resource recover site. No impact would occur, and no mitigation is required.

Sources:

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

1. Department of Conservation. 2021. SMARA Statutes and Regulations (SMARA, Public Resources Code, Sections 2710-2796). Available at https://www.conservation.ca.gov/dmr/lawsandregulations.
2. Riverside County. 2015. County of Riverside General Plan – Multipurpose Open Space Element. Revised December 8, 2015.
   - Figure OS-6 – Mineral Resource Zone
3. Title 19 – Zoning of the Perris Municipal Code
   - Chapter 19.66 – Surface Mining and Reclamation Plan Regulations

XIII. NOISE – Would the project result in:

a) Generation of a 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?	☐	☐	☒	☐

Response:

Existing Ambient Noise Measurements

The Project Area can be characterized by flat and undeveloped land. It is surrounded by a mix of residential and commercial land uses. Short-term (L_{eq}) measurements are considered representative of the noise levels throughout the daytime. L_{eq} is the equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

Existing noise levels generated along City routes were modeled using "hard site" and "soft site" analyses in which "hard site" analysis assumes the area between the roadway and the noted CNEL location is comprised of reflective surfaces and "soft site" analysis along the same routes assumes sound absorptive conditions (City of Perris 2005d).

The existing "hard site" and "soft site" traffic noise levels in the Project vicinity and sources of noise measured at each location are listed in in Table XIII-1 and Table XIII-2.

Table XIII-1. Existing Traffic Noise Levels (Hard Site Modeling)

Street Name	Segment	Existing Average Daily Trips (ADT) Volumes	Existing CNEL (dBA @ 50 ft from centerline)	Distance to 70 CNEL	Distance to 65 CNEL	Distance to 60 CNEL
Navajo Road	Sioux Drive – Indian Circle	9,811	66.4	22	69	219
Navajo Road	Sioux Drive – 4th Street	9,811	66.4	22	69	219
SR-74	Indian Circle – Navajo Road	17,200	74.8	149	473	1,495

Table XIII-2. Existing Traffic Noise Levels (Soft Site Modeling)

Street Name	Segment	Existing ADT Volumes	Existing CNEL (dBA @ 50 ft from centerline)	Distance to 70 CNEL	Distance to 65 CNEL	Distance to 60 CNEL
Navajo Road	Sioux Drive – Indian Circle	9,811	65.4	25	53	115
Navajo Road	Sioux Drive – 4th Street	9,811	65.4	25	53	115
SR-74	Indian Circle – Navajo Road	17,200	73.7	88	189	407

As shown in Tables XIII-1 and XIII-2, the ambient recorded "hard site" and "soft site" noise levels range from 66.4 to 74.8 dBA CNEL near the Project Area. The most common noise in the Project vicinity is produced by automotive vehicles (e.g., cars, trucks, buses, motorcycles) traveling on SR-74. Vehicular noise varies with the volume, speed and type of traffic. Slower traffic produces less noise than fast-moving traffic. Trucks typically generate more noise than cars. Infrequent or intermittent noise also is associated with vehicles, including sirens, vehicle alarms, slamming of doors, trains, garbage, and construction vehicle activity and honking of horns. These noises add to urban noise and are regulated by a variety of agencies.

Construction Noise Impacts

Construction noise associated with the Proposed Project would be temporary and would vary depending on the nature of the activities being performed. Noise generated would primarily be associated with the operation of off-road equipment for onsite construction activities as well as construction vehicle traffic on area roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). During construction, exterior noise levels could negatively affect sensitive land uses in the vicinity of the construction site. The nearest noise sensitive land uses to the Project Area are residences located approximately 230 feet distant across Navajo Road.

Chapter 7.34, *Noise Control*, of the City of Perris Municipal Code prohibits construction between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on a legal holiday, with the exception of Columbus Day and Washington's birthday, or on Sundays. Construction activity shall not exceed 80 dBA in residential zones in the City. The Project Area is designated and zoned as Commercial Community, not residential. Additionally, construction would occur through the Project Area and would not be concentrated at one point.

Construction of the Proposed Project is expected to require to the use of graders, bulldozers, and water trucks/pickup trucks. Noise associated with the use of construction equipment is estimated to be between 75 dBA and 85 dBA at a distance of 50 feet from the active construction area. For every doubling of distance, the sound level reduces by 6dB; therefore, at a distance of 100 feet, construction noise is estimated to be between 69 dBA and 79 dBA. At a distance of 200 feet, construction noise is estimated to be between 63 dBA and 73 dBA. As previously stated, the nearest noise sensitive land uses to the Project Site are residences located approximately 230 feet distant across Navajo Road. Given this distance away, the noise attenuation achieved is estimated to be between 63 dBA and 73 dBA or greater and would be below the City's threshold of 80 dBA in residential zones. A less than significant impact would occur, and no mitigation is necessary.

Operational Offsite Traffic Noise Impacts

The Proposed Project has a net trip generation of 47 inbound and 45 outbound trips in the AM peak hour, and 75 inbound and 72 outbound trips in the PM peak hour, and 2,114 daily trips, including pass-by and internal trip considerations (K2 Traffic Engineering, Inc. 2020).

Previously identified Tables XIII-1 and XIII-2 identifies traffic noise levels based on estimated average daily trips on area roadways. Vehicle noise emissions increase with speed, and increased traffic volumes increase traffic noise, but it takes a doubling of traffic to increase noise levels by only 3 dB (Caltrans 2013). The addition of Project traffic to the local circulation system would be similar to existing conditions in terms of ambient noise levels. The Project's increase in traffic would result in a less than operational noise impact. No mitigation is required.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Operational Onsite Stationary Noise

The main stationary operational noise associated with the Proposed Project would be activities occurring in the Project Area, such as gas station operations and carwash activity including washing/drying components of the carwash and the use of vacuums. Onsite Project operational noise is estimated to be the same as or less than the noise levels estimated for construction activities. The City of Perris set daytime 80 dBA (7:01 a.m. to 10:00 p.m.) and nighttime 60 dBA (10:01 p.m. to 7:00 a.m.) noise standards for residential and commercial land uses in the City's Municipal Code Section 7.34.040. As noted by Project Applicant, the carwash will be in operations from 6:00 a.m. to 10:00 p.m. (Municipal Code Section 7.34.060). As such, noise levels during the hours when the carwash is not in operations will be substantially lower. Noise as a result of Project operations could be mostly unperceivable due to the greater ambient noise levels. For the reasons described, this impact is less than significant.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

Response:

Construction-Generated Vibration

Excessive groundborne vibration impacts result from continuously occurring vibration levels. Increases in groundborne vibration levels attributable to the Proposed Project would be primarily associated with short-term construction-related activities. Construction in the Project Area would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance.

Construction-related ground vibration is normally associated with impact equipment such as pile drivers, jackhammers, and the operation of some heavy-duty construction equipment, such as dozers and trucks. Vibration decreases rapidly with distance and it is acknowledged that construction activities would occur throughout the project site and would not be concentrated at the point closest to sensitive receptors. Groundborne vibration levels associated with construction equipment are summarized in Table XIII-3.

Table XIII-3. Representative Vibration Source Levels for Construction Equipment

Equipment Type	Peak Particle Velocity at 25 Feet (inches per second)
Large Bulldozer	0.089
Sonic Pile Driver	0.170
Caisson Drilling	0.089
Loaded Trucks	0.076
Rock Breaker	0.089
Jackhammer	0.0.5
Small Bulldozer/Tractor	0.003

Sources: FTA 2018; Caltrans 2020b.

The City of Perris Municipal Code identifies vibrations in a manner prohibited by the provisions of the ordinance codified in Chapter 7.34 is considered a public nuisance. The Municipal Code does not provide specific vibration levels associated with construction. However, a discussion of construction vibration is included for full disclosure purposes. For comparison purposes, the Caltrans' (2020) recommended standard of 0.2 inch per second peak particle velocity (PPV) with respect to the prevention of structural damage for older residential buildings is used as a threshold. This is also the level at which vibrations may begin to annoy people in buildings.

It is acknowledged that construction activities would occur throughout the Project Area and would not be concentrated at the point closest to the nearest structure. The nearest structures of concern to the construction site is located 230 feet distant. Based on the vibration levels presented in Table XIII-3, ground vibration generated by heavy-duty equipment would not be anticipated to exceed approximately 0.170 inch per second PPV at 25 feet. Thus, the structure located at 230 feet would not be negatively affected. Predicted vibration levels at the nearest structures would not exceed recommended criteria. This impact is less than significant, and no mitigation is required.

Operational-Generated Vibration

Project operations would not include the use of any stationary equipment that would result in excessive groundborne vibration levels. For this reason, no impact would occur, and no mitigation is required.

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?	☐	☐	☐	☒

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Response:

The City of Perris has two airports within or near its City limits: March Air Reserve Base/Inland Port Airport (March ARB/IPA) and Perris Valley Airport. March ARB/IPA is located approximately 5.25 miles north of the Project Area. The Project Area is not located within an aircraft hazard zone. Perris Valley Airport is located approximately 1.68 miles southeast of the Project Area (City of Perris 2005a).

The Project Area is located within Airport Compatibility Zone E of the March Air Reserve Base/Inland Port Airport Influence Area. The Project Area is located outside the 55 dBA CNEL noise impact zone per the *March ARB/IP ALUCP Safety Zone Delineations* section of the City of Perris General Plan Land Use Element (City of Perris 2005d).The Project Area is not within the Perris Valley Airport's influence area (City of Perris 2005a). Implementation of the Proposed Project would not affect airport operations nor result in increased exposure of employees or those visiting the site to aircraft noise. No impact would occur, and no mitigation is required.

Sources:

1. City of Perris General Plan
   - Land Use Element (adopted 2005, amended 2016)
   - Noise Element (adopted 2005, amended 2016)
2. Title 7 – Health and Welfare of the Perris Municipal Code
   - Chapter 7.34 – Noise Control
     - Section 7.34.040 – Sound amplification
     - Section 7.34.060 – Construction noise
3. Caltrans. 2020. Transportation- and Construction-Induced Vibration Guidance Manual.
4. FHWA. 2006. Roadway Construction Noise Model
5. FTA. 2018. Transit Noise and Vibration Impact Assessment.

XIV. POPULATION AND HOUSING – 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 extension of road or other infrastructure)?	☐	☐	☒	☐

Response:

The Proposed Project would develop an automobile gas station consisting of a convenience store, retail store, fuel canopy, underground storage tanks, and automated carwash. The Proposed Project does not propose the construction of new housing that would directly or indirectly induce population growth in the area. The Proposed Project is not expected to generate a substantial permanent increase in employment opportunities in the area capable of inducing population growth. A less than significant impact would occur, and no mitigation is required.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Response:

Currently, there are no homes located on the Project property. Therefore, the Proposed Project would not displace housing. No impact would occur, and no mitigation is required.

Sources:

1. City of Perris General Plan
   - Land Use Element (adopted 2005, amended 2016)
2. City of Perris. 2013. 2014-2021 Housing Element. Available at https://www.cityofperris.org/home/showpublisheddocument/455/637203139709070000.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES – Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental 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:				
i) Fire protection?	☐	☐	☒	☐

Response:

The Proposed Project would develop an automobile gas station consisting of a convenience store, retail store, fuel canopy, underground storage tanks, and automated carwash, which would add to the demand on fire protection services. The California Department of Forestry and Fire Protection (CDF), under contract with the County of Riverside and operating as the Riverside County Fire Department, provide fire prevention and suppression to the City of Perris (City of Perris 2005b). The City of Perris has fourteen firefighters assigned to two fire stations. The closest fire station to the Project Area is Fire Station #1, located approximately 0.80 miles northeast at 210 W. San Jacinto Avenue. However, the Proposed Project would be required to implement all applicable California Fire Code Standards. The Proposed Project's design and construction plans would be reviewed by City of Perris' Office of the Fire Marshal to ensure fire codes are met and that adequate fire protection services would be available to meet the Proposed Project's needs (City of Perris 2021; Municipal Code 1972, § 20). The Applicant would pay the City of Perris' Development Impact Fees. The City imposes development impact fees on development projects to lessen the impact to public services, infrastructure and facilities (City of Perris 2020). Impacts would be less than significant, and no mitigation is required.

ii) Police protection?	☐	☐	☒	☐

Response:

The Proposed Project would develop an automobile gas station on a currently undeveloped parcel. This development would result in an increase in demand for police protection services. The Riverside County Sheriff's Department, under contract with the City of Perris and operating as the Perris Police Department, provides law enforcement services to the City of Perris. The Perris Station is located at 137 N. Perris Boulevard in Perris, which is located approximately 1.11 miles northeast of the Project Area (City of Perris 2005b). The Applicant would pay the City of Perris' Development Impact Fees, which would cover the Proposed Project's fair share on public services (City of Perris 2020). Impacts would be less than significant, and no mitigation is required.

iii) Schools?	☐	☐	☐	☒

Response:

The Proposed Project does not include a residential component and is not anticipated to induce population growth; therefore, it would not create additional demand for schools. No impact would occur, and no mitigation is required.

iv) Parks?	☐	☐	☐	☒

Response:

As described above, the Proposed Project is not anticipated to induce population growth; therefore, it would not create additional demand for parks. No impact would occur, and no mitigation is required.

v) Other public facilities?	☐	☐	☐	☒

Response:

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

As described above, the Proposed Project is not anticipated to induce population growth; therefore, it would not create additional demand for other public facilities, such as libraries. No impact would occur, and no mitigation is required.

Sources:

1. City of Perris General Plan
   - Safety Element (adopted 2005, amended 2016)
2. Title 20 – Fire Protection Regulations of the Perris Municipal Code
   - Section 20.01 – General Provisions
3. City of Perris. 2020. Development Impact Fees. Available at https://www.cityofperris.org/home/showpublisheddocument/13652/637606600455830000. July 1, 2020.
4. City of Perris. 2021. Fire Marshal. Available at https://www.cityofperris.org/departments/development-services/fire-marshal.

XVI. RECREATION – Would 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?	☐	☐	☐	☒

Response:

The Project Area is located within a vacant undeveloped lot designated for commercial uses by the City of Perris General Plan. The 8-acre Rotary Park, a 346-acre portion of the Rimrock Nature Preserve, and a 39-acre former landfill site, Bellamo Lane, comprise the open space in the Project vicinity (City of Perris 2005c, City of Perris 2006). The Proposed Project would not involve residential uses and therefore is not anticipated to cause a substantial increase in the population of the project region. The Proposed Project includes an automobile gas station consisting of a convenience store, retail store, fuel canopy, underground storage tanks, and automated carwash, which is not anticipated to result in a significant increase in employment; therefore, no increase in demand or use of existing parks or recreational facilities would result from the implementation of the Proposed Project. No impact would occur, and no mitigation is required.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?	☐	☐	☐	☒

Response:

The Proposed Project would not require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. No impact would occur, and no mitigation is required.

Sources:

1. City of Perris General Plan
   - Land Use Element (adopted 2005, amended 2016)
   - Open Space Element (adopted 2006)

XVII. TRANSPORTATION – Would the project:

a) Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☒	☐	☐

Response:

A Traffic Impact Study was completed for the Proposed Project by K2 Traffic Engineering, Inc. (K2 Traffic Engineering, Inc. 2020) (Attachment F).

Construction Impacts

The Proposed Project would generate short term construction related vehicle trips. Construction traffic would include crews and equipment traveling to and from the Project Area. The Proposed Project would be consistent with the land use and zoning designation of the Project Area. Additionally, traffic generated by construction of the Proposed Project would be temporary and would not conflict with the City of Perris's Circulation Element. Existing public streets shall remain open to the public during construction and public inconvenience will be minimized at all times. Impacts would be less than significant, and no mitigation is required.

Operational Impacts

The Proposed Project would develop an automobile gas station consisting of a convenience store, retail store, fuel canopy, underground storage tanks, and automated carwash, which is a consistent use with the project site's land use designation (CC – Commercial Community). The Proposed Project has a net trip generation of 47 inbound and 45 outbound trips in the AM peak hour, and 75 inbound and 72 outbound trips in the PM peak hour, and 2,114 daily trips, including pass-by and internal trip considerations (K2 Traffic Engineering, Inc. 2020).

The Traffic Impact Study evaluated the following study scenarios:

- Existing Traffic (2020)
- Pre-Completion (Existing + Ambient)
- Project Completion (Existing + Ambient + Project)
- Project Completion with Mitigation Measure, if necessary

The following intersections were included in the Traffic Study:

1. SR-74/W. 4th Street at S. A Street
2. SR-74/W. 4th Street at Navajo Road
3. Indian Hills Circle at Navajo Road
4. Indian Hills Circle at Tomahawk Road
5. SR-74 at Indian Hills Circle
6. Project Driveway at Navajo Road

Under existing conditions, all study intersections operate at level of service (LOS) "D" or better. Under Project Completion (Existing + Ambient + Project), all studied intersections will maintain an LOS of "D" or better, except for the intersection of Navajo Road and Indian Hills Circle where the minor approaches (Indian Hills Circle) operate at LOS E during the PM peak hour (K2 Traffic Engineering, Inc. 2020).

The City's LOS standards, as published in the City's General Plan, indicate that LOS E is acceptable for all study intersections. All study intersections remain operating at an acceptable LOS of E or better in each study scenario. Therefore, operational traffic impacts would be less than significant. No mitigation would be required.

The Traffic Impact Study also examined two turn pockets at study intersections for the sufficiency of queuing capacity. These turn pockets include:

1. 4th Street at A Street
2. SR-74/4th Street at Navajo Road

As pre-existing conditions, the following turn pockets have deficient queue length:

1. 4th Street at A Street: Eastbound Left & Northbound Left

Project trips are not anticipated to create any new deficiency of queue length beyond those locations identified as pre-existing conditions (K2 Traffic Engineering, Inc. 2020). However, the Traffic Impact Study recommends the following off-site improvements:

1. Extend northbound left-turn pocket on A Street at 4th Street to provide 190 feet of storage length
2. Extend eastbound left-turn pocket on 4th Street at A Street to provide 150 feet of storage length

The Traffic Impact Study also completed a fair share contribution analysis. Fair share contribution represents the percentage of construction cost that the Proposed Project should contribute toward the future traffic signalization to mitigate the traffic impacts at the intersection of Navajo Road and Indian Hills Circle. The fair share contribution is calculated based on the sum of project trips in the PM peak hour at project opening year plus project as a percentage of total trips during the same period. The Traffic Impact Study determined that the Proposed Project should contribute a fair share of 20 percent of the traffic signalization cost for the intersection of Navajo Road and Indian Hills Circle. With the implementation of Mitigation Measure **TRANS-1**, the Project will result in no or less than significant traffic impact and all study intersections are expected to operate at the target LOS "D" or better.

The Proposed Project does not involve any uses that would increase population beyond what is considered in the General Plan and, therefore, would not affect City-wide plans for population growth in the Project Area. As such, the Proposed Project would be consistent with the City of Perris General Plan Circulation Element (City of Perris 2005e). No impact would occur.

Sidewalks are present and in good conditions along Navajo Road and SR-74 but are not present along the east side of Indian Hills Circle in the Project vicinity. The intersection of Navajo Road and SR-74 provides crosswalk at each approach with accessible ramps and pedestrian push buttons to activate pedestrian crossing phases. ADA compliant path of travel access point would be provided at each new driveway. A Riverside Transit Agency's (RTA) bus stop of Route 9 is located on SR-74 along the south border of the Project Area (RTA 2021). Additionally, the Project Area is 60 feet from an existing RTA bus stop of Route Number 22 which runs along Navajo Road. The Proposed Project would not affect this bus stop. No impacts would occur.

Mitigation Measure:

TRANS-1: The subject development shall contribute a fair share of 20 percent of the traffic signalization cost for the intersection of Navajo Road and Indian Hills Circle.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒

Response:

CEQA Guidelines section 15064.3, subdivision (b) details the use of vehicle miles traveled (VMT) to assess the significance of transportation impacts. As detailed in CEQA Guidelines section 15064.3, subdivision (c), a lead agency may elect to be governed by the provisions of this section immediately. As of July 1, 2020, the provisions of this section apply statewide.

Section 15064.3 subdivision (b) of the CEQA guidelines specify for Land Use Projects "Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major traffic stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the Project Area compared to existing conditions should be presumed to have a less than significant transportation impact."

The Proposed Project would develop an automobile gas station consisting of a convenience store, retail store, fuel canopy, underground storage tanks, and automated carwash, which is a consistent use with the project site's land use designation (CC – Commercial Community). The Proposed Project is not located along an existing high-quality transit corridor. The Proposed Project is suitable for the Western Riverside Council of Governments (WRCOG) screening tool. The WRCOG screening output shows that

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
the Proposed Project is located within a low VMT generating Traffic Analysis Zone (TAZ) and can be presumed to have less than significant VMT impact. Complete VMT analysis and forecasting through regional model is, therefore, not required for the Proposed Project (K2 Traffic Engineering, Inc. 2020). The Proposed Project would not conflict with CEQA Guidelines section 15064.3, subdivision (b). No impact would occur, and no mitigation is required.				
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
Response: The Proposed Project would provide two new driveways, one on Indian Hills Circle for two-way access and one on Navajo Road for right-in-right-out access (K2 Traffic Engineering, Inc. 2020). The Project provides drive aisles of at least 26 feet wide for two-way circulation. Adequate space is provided to ensure parking maneuvers are contained on site without affecting traffic on public streets. On-site circulation appears efficient and safe without bottlenecks (K2 Traffic Engineering, Inc. 2020). No impact would occur, and no mitigation is required.				
d) Result in inadequate emergency access?	☐	☐	☐	☒
Response: The Proposed Project has been designed to meet City development standards. Furthermore, the Proposed Project plans would be submitted to the City for plan check and approval. The City's Fire Department has reviewed proposed project plans for emergency access and has conditioned the project to ensure emergency access is adequate in the Project Area. No impact would occur, and no mitigation is required.				
Sources: 1. City of Perris General Plan, adopted 2005 • Circulation Element (adopted 2005, amended 2008) 2. K2 Traffic Engineering, Inc. 2020. Traffic Impact Study Go Fresh Gas Station at Southwest Corner of SR-74 and Navajo Road, Perris. November 23, 2020. 3. RTA. 2021. System Map.				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES – 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	☐	☐	☒	☐

Response:

CEQA defines a "historical resource" as a resource that meets one or more the following criteria: (1) is listed in, or determined eligible for listing in, the California Register of Historical Resources (California Register); (2) is listed in a local register of historical resources as defined in PRC §5020.1(k); (3) is identified as significant in a historical resource survey meeting the requirements of PRC §5024.1(g); or (4) is determined to be a historical resource by a Project's Lead Agency (PRC §21084.1 and State CEQA Guidelines §15064.5[a]). "Local register of historical resources" means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution. The Project site is currently unoccupied and is neither listed nor eligible for listing on a local or State historic resource register.

An SLF search was conducted through the NAHC. The City initiated AB 52 tribal consultation with interested tribes on August 24th and concluded consultation on September 22. No tribes have requested consultation under AB 52 for this Project. In the absence of an identified resource listed eligible for listing in a local or State historic resource register or identified tribal resource, no significant impact will occur; therefore, no mitigation is required.

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.	☐	☒	☐	☐

Response:

While there are no known tribal cultural resources (TCRs) in the project footprint, ground-disturbing activities have the potential to result in the discovery of, or inadvertent damage to, archaeological contexts and human remains, and this possibility cannot be eliminated. Consequently, there is a potential for significant impacts on TCRs. Implementation Mitigation **CUL-1** through **CUL-9** would reduce the potential impacts to less than significant.

Mitigation Measures **CUL-1** through **CUL-9** are listed under Section V. Cultural Resources of this Initial Study; however, they are repeated here for reference.

Mitigation Measures:

CUL-1: Prior to issuance of a grading permit, the applicant shall provide written verification in the form of a letter from the project archaeologist to the lead agency stating that a certified archaeologist has been retained to implement the monitoring program.

CUL-2: The project applicant shall provide Native American monitoring during grading. The Native American monitor shall work in concert with the archaeological monitor to observe ground disturbances and search for cultural materials.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

CUL-3: The certified archaeologist shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program.

CUL-4: During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and tribal representative shall be on-site, as determined by the consulting archaeologist, to perform periodic inspections of the excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The consulting archaeologist shall have the authority to modify the monitoring program if the potential for cultural resources appears to be less than anticipated.

CUL-5: Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed.

CUL-6: In the event that previously unidentified cultural resources are discovered, the archaeologist shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. The archaeologist shall contact the lead agency at the time of discovery. The archaeologist, in consultation with the lead agency, shall determine the significance of the discovered resources. The lead agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the lead agency before being carried out using professional archaeological methods. If any human bones are discovered, the county coroner and lead agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains.

CUL-7: Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The project archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis.

CUL-8: All cultural material collected during the grading monitoring program shall be processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.

CUL-9: A report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the lead agency prior to the issuance of any building permits. The report will include DPR Primary and Archaeological Site Forms.

Sources:

1. City of Perris General Plan
   - Conservation Element (adopted 2005, amended 2008)
2. Brian F. Smith and Associates, Inc. 2019. Phase I Cultural Resources Survey for the Go Fresh Gas Project, Perris, California. July 31, 2019.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – 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?	☐	☐	☒	☐

Response:

The Proposed Project would develop an automobile gas station consisting of a convenience store, retail store, fuel canopy with eight fuel pumps, underground storage tanks, and an automated carwash. The Proposed Project would require connections to water, sewer, storm water drainage, electric, natural gas, and telecommunication utilities, which are located within adjacent roadways (Navajo Road). The installation of utility connections would result in physical impacts in the Project Area and on adjacent roadway areas for connections; however, these impacts are considered to be part of the Proposed Project's construction phase and are evaluated throughout this Initial Study accordingly. Impacts would be less than significant, and no mitigation is required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐

Response:

Potable water to the Project Area would be supplied by the EMWD. According to EMWD's 2020 Urban Water Management Plan, EMWD will have sufficient water supplies to meet expected demands from 2020 through 2045 under normal, historic single-dry and historic multiple-dry year conditions (EMWD 2020). EMWD forecasts for projected water demand are based on the land use designations contained within the general plans that cover the geographic area within EMWD's service area, which include the Project Area. The Proposed Project would be consistent with the City of Perris General Plan land use designation for the Project Area; therefore, the water demand associated with the Proposed Project was considered in the demand anticipated by EMWD's 2020 Urban Water Management Plan. As such, sufficient water supplies would be available to serve the Proposed Project. Impacts would be less than significant, and no mitigation is required.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

Response:

The Proposed Project would generate wastewater from restrooms, faucets, and the automated carwash. The Proposed Project would install a sewer line to connect the Project Area to existing sewer lines underlying adjacent streets. Wastewater service in the City of Perris is provided by the EMWD. The City's wastewater is collected by the EMWD and conveyed five RWRFs. The Perris Valley Regional Water Reclamation Facility (PVRWRF) is the largest operating plant in the EMWD service area and serves the Project Area. The facility is located on approximately 300 acres just west of I-215 and south of Case Road. In March 2014, EMWD completed the most recent expansion of the PVRWRF. The typical daily flows for PVRWRF is 15.5 million gallons per day (mgd). With an ultimate capacity of 100 mgd, the facility is poised to meet the current and future demands of the region as well as help to meet the increasing demand for recycled water throughout EMWD's service area (EMWD 2021). It is anticipated that the construction and operation of a convenience store, retail store, fuel canopy, and automated carwash would not generate wastewater volumes that would exceed the treatment capacity of PVRWRF. Impacts would be less than significant, and no mitigation is required.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Response:

Solid waste collection service in the City of Perris is provided by CR&R Disposal. Waste is transported to Perris Materials Recovery Facility at 1706 Goetz Road where recyclable materials are separated from solid wastes. Recyclable materials are sold in bulk and transported for processing and transformation for other uses. Solid wastes are transported to either the El Sobrante Landfill on Dawson Canyon Road in Corona or to the Badlands Landfill on Ironwood Avenue in Moreno Valley (City of Perris 2005a).

The Proposed Project is consistent with the land use designation presented in the City of Perris General Plan. As such, the Proposed Project is within the growth contemplated by the General Plan. The operation of the convenience store, retail store, fuel canopy, underground storage tanks, and automated carwash is not anticipated to generate solid waste in excess of State or local standards or in excess of the capacity of local solid waste facilities. Furthermore, the Proposed Project would comply with all solid waste reduction goals. Impacts would be less than significant, and no mitigation is required.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Response:

Waste generated by the Proposed Project would comply with all applicable federal, state, and local statutes and regulations related to solid waste. No impact would occur, and no mitigation is required.

Sources:

1. City of Perris General Plan
   - Conservation Element (adopted 2005, amended 2008)
2. Eastern Municipal Water District (EMWD) 2020 Urban Water Management Plan. Available at https://www.emwd.org/sites/main/files/file-attachments/urbanwatermanagementplan_0.pdf?1625160721.
3. EMWD. 2021. Perris Valley Regional Water Reclamation Facility. Available at https://www.emwd.org/sites/main/files/file-attachments/pvrwrffactsheet.pdf?1620227213. January 2021.

XX. WILDFIRE – 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?	☐	☐	☐	☒

Response:

The Proposed Project would not have any direct effect on an adopted emergency response plan or emergency evacuation plan. The City's development review process includes reviews by the City's fire and police departments for consideration of emergency access requirements. The Proposed Project's design would meet City standards for required emergency vehicle access and emergency egress of residents. Established City procedures including plan check, permit issuance, and construction inspection would ensure implementation of the Proposed Project is consistent with the approved design. No impact would occur, and no mitigation is required.

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?	☐	☐	☒	☐

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Response:

The Project Area is not within or near a state or federal responsibility area (CAL FIRE 2021). The Project Area is not within a fire risk area as identified in the City of Perris General Plan (City of Perris 2005b). The Project Area is an area surrounded by undeveloped land, commercial developments, and residential developments that would not exacerbate the wildfire risk of the Project occupants. Impacts would be less than significant and no mitigation is required.

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?	☐	☐	☒	☐

Response:

As previously described, the Project Area is not within or near a state responsibility area or a fire risk area as identified by the City of Perris (CAL FIRE 2021, City of Perris 2005b). The Project Area is located on an undeveloped lot surrounded by undeveloped land, commercial developments, and residential developments. Existing infrastructure exists in the Project vicinity and would not exacerbate fire risk. Impacts would be less than significant and no mitigation is required.

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?	☐	☐	☒	☐

Response:

The project site is located in a relatively flat area that is not subject to landslides or downstream flooding as a result of wildfire risk. Impacts would be less than significant, and no mitigation is required.

Sources:

1. City of Perris General Plan
   - Safety Element (adopted 2005, amended 2016)
2. CALFIRE. 2021. Fire Hazard Severity Zones Viewer. Available at https://egis.fire.ca.gov/FHSZ/.
3. City of Perris Emergency Operations Plan (EOP), Part I: Basic Plan. 2013. Available at https://www.cityofperris.org/home/showdocument?id=362. May 2013.
4. City of Perris. 2013. Local Hazard Mitigation Plan, City of Perris. Available at https://www.cityofperris.org/home/showdocument?id=370. April 2013.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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 a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Response:

As discussed in Section IV. Biological Resources of this Initial Study, the Project Area is entirely disturbed and dominated by non-native annuals. There are no wetlands present in the Project Area. No impacts to special-status plant and wildlife species are anticipated. Protocol surveys for burrowing owl were

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
completed for the Project Area. No burrows, burrowing owls, or burrowing owl sign were observed. The Project Area was determined to provide unsuitable burrowing owl habitat due to the absence of active ground squirrel burrows, berms, and proximity to developed commercial land uses. No impacts to burrowing owls are expected. The Project Area contains riparian/riverine habitat. Evidence for this conclusion was provided by the presence of riparian/riverine vegetation and channel flow line. The drainage channel falls within the definitions of CDFW and RWQCB jurisdiction, but not within the current definition of USACE jurisdiction. It is considered a riparian/riverine resource under the MSHCP. Implementation of Mitigation **BIO-1** through **BIO-3** would reduce the potential impacts to less than significant. As discussed in Section V. Cultural Resources of this Initial Study, no cultural have previously been recorded in the Project Area and none were recorded during the field survey completed for the Proposed Project. In general, the archaeological sensitivity of the Project Area is considered to be low. However, unknown buried cultural resources may be present below the ground surface which may be affected during ground disturbing construction activities. With the implementation of Mitigation Measures **CUL-1** through **CUL-9** impacts would be less than significant.				
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 project, and the effects of probable future projects.)?	☐	☒	☐	☐
Response: Cumulative impacts are defined as two or more individual (and potentially less than significant) project effects that, when considered together or in concert with other projects combine to result in a significant impact within an identified geographic area. In order for a project to contribute to cumulative impacts, it must result in some level of impact on a project specific level. As discussed throughout this Initial Study, potentially significant impacts were identified for biological resources, cultural resources, and transportation. With Mitigation Measures **BIO-1** through **BIO-3**, **CUL-1** through **CUL-9** and **TRANS-1**, the Proposed Project's contribution to cumulative impacts would not be considerable. Furthermore, other foreseeable projects would be subject to CEQA and would undergo the same level of review as the Proposed Project and include mitigation measures to minimize potentially significant impacts.				
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐
Response: Potentially significant impacts identified in this Initial Study are concerning construction impacts to biological, cultural, and tribal resources, which would be mitigated to a less than significant level. No substantial adverse direct and indirect effects to human beings would occur with Project implementation.				

References:

[BFSA] Brian F. Smith and Associates, Inc.

2019 Phase I Cultural Resources Survey for the Go Fresh Gas Project, Perris, California. July 31, 2019.

[CAL FIRE] California Department of Forestry and Fire Protection

2021 Fire Hazard Severity Zones Viewer. Available at https://egis.fire.ca.gov/FHSZ/.

Caltrans

2013 Technical Noise Supplement to the Traffic Noise Analysis Protocol

2020a Scenic Highways. Available at https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed on August 11, 2021.

2020b Transportation- and Construction-Induced Vibration Guidance Manual.

[CAPCOA] California Air Pollution Control Officers Association

1997 Gasoline Service Station Industrywide Risk Assessment Guidelines.

2017 California Emissions Estimator Model (CalEEMod), version 2016.3.2.

[CARB] California Air Resources Board

2017 EMFAC2017 Web Database Emissions Inventory. https://www.arb.ca.gov/emfac/2017/.

[CEC] California Energy Commission

2019 California Energy Consumption Database. http://www.ecdms.energy.ca.gov/Default.aspx.

City of Perris

2005a General Plan – Conservation Element

2005b General Plan – Safety Element

2005c General Plan – Land Use Element

2005d General Plan – Noise Element

2005e General Plan – Circulation Element

2006 General Plan – Open Space Element

2013a Perris Emergency Operations Plan (EOP), Part I: Basic Plan. 2013. Available at https://www.cityofperris.org/home/showdocument?id=362. May 2013

2013b Local Hazard Mitigation Plan, City of Perris. Available at https://www.cityofperris.org/home/showdocument?id=370. April 2013.

2016 Climate Action Plan. Available at https://www.cityofperris.org/Home/ShowDocument?id=12935. February 23, 2016.

2020 2020. Development Impact Fees. Available at https://www.cityofperris.org/home/showpublisheddocument/13652/637606600455830000. July 1, 2020.

City of Perris Municipal Code

Title 7 – Health and Welfare of the Perris Municipal Code

Chapter 7.04 – Nuisances

Chapter 7.34 – Noise Control

Section 7.34.040 – Sound amplification

Section 7.34.060 – Construction noise

Title 10 – Vehicles and Traffic of the Perris Municipal Code

Chapter 10.42 – Parking Restrictions on Commercial and Other Vehicles

Section 10.42.040 – Permit Conditions

Title 14 – Water and Sewage of the Perris Municipal Code

Section 14.22 – Stormwater/Urban Runoff Management and Discharge Control

Title 19 – Zoning of the Perris Municipal Code

Section 19.02.110 – Lighting

Chapter 19.38 – CC Zone

Section 19.71.050 – Tree Protection

Title 20 – Fire Protection Regulations of the Perris Municipal Code

Section 20.01 – General Provisions

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Appendices

Attachment A – Air Quality and Greenhouse Gas Assessment
Attachment B – Gasoline Vapor Health Risk
Attachment C – Biological Resources Assessment
Attachment D – Cultural Resources Assessment
Attachment E – Traffic Impact Study
Attachment F – Water Quality Management Plan

Attachment A – Air Quality and Greenhouse Gas Assessment

Attachment B – Biological Resources Assessment

Attachment C – Cultural Resources Assessment

Attachment D – Traffic Impact Study

Attachment E – Geotechnical Engineering Investigation

Attachment F – Water Quality Management Plan