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

Project Title	General Plan Amendment 21-05040, Change of Zone 21-05039, and Tentative Tract Map 38071 (TTM21-05032)
Date	Revised December 15, 2021
Lead Agency Name and Address	City of Perris Planning Division, 135 North "D" Street, Perris, California 92570
Contact Person and Phone Number	Nathan Perez, Senior Planner, (951) 943-5003, ext. 279
Project Location	The project site is located north of Ramona Expressway, east of Evans Road (APN# 302-200-020 through 034, and 302-210-001 through 009).
Project Sponsor's Name and Address	Mission Pacific Land Company Jason Keller 4100 Newport Place Dr., Suite 790 Newport Beach, CA 92660
General Plan Designation	Existing: Specific Plan (No adopted plan) Proposed: R-6000
Zoning	Existing: R-10,000 Proposed: R-6000
Description of Project	The project site lies northeasterly of the intersection of Ramona Expressway and Evans Rd. in the City of Perris and is located within the southeast quarter of the southeast quarter of Section 5, Township 5 South, Range 3 West S.B.B.M. The property is vacant and has historically been used for dry farming but has been fallow land as the area has begun transitioning from agriculture to suburban residential land use. There are no structures on the property. The proposed development consists of a subdivision of 48.61 gross acres into 192 lots having a minimum lot size of 6,000 square feet to be developed in two (2) phases with 192 single family detached residential units. The tract includes two water quality basins to meet Clean Water Act requirements. Two points of access are proposed along Evans Rd. Access within the proposed project will consist of public streets. The project developer will install 5 residential EV Charging stations in the garages of five separate dwelling units. All other units shall be constructed with a listed raceway to accommodate a dedicated 208/240-volt branch circuit in compliance with CalGreen Code Section 4.106.4.1 to facilitate the future installation and use of EV chargers by property owners.

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	The project also includes a drainage discharge pipe outlet within land owned by the State Department of Water Resources and identified as APN 302-210-006. There is a contiguous Not-A-Part parcel northeasterly of the tract where two points of access are provided to serve potential future development of that parcel. Street 'F' is shown as a cul-de-sac that is designed to extend access and Street 'G' to the NAP parcel. Earthwork will balance onsite with no soil import or export required.
Surrounding Land Uses and Setting	Development in the area consists of Tract (Tr.) 36647 and the East Stormwater Basin across Evans Rd. to the west, Tr. 32708 to the north, Lake Perris Dr. and automotive sports facilities associated with the Southern California Fair and Event Center to the east, and Line U of the Flood Control District Master Plan, owned by the State Department of Water Resources (SDWR) and Ramona Expressway along the south. The May Ranch community lies on the south side of Ramona Expressway.

Boundary	General Plan Designation	Existing Land Use
Eastern	County of Riverside	Recreation (Fairgrounds)
Northern	Residential 6000	Residential (Tr, 32708)
Southern	May Ranch Specific Plan	Commercial and Residential
Western	Residential 6000 and Public	Vacant (Tr. 36647)

General Plan and Zoning	The project area is designated as Specific Plan in the City of Perris 2030 General Plan. However, no specific plan has been adopted for this area. The project site and surrounding lands are being developed as the Stratford Ranch development. The project site is zoned for 10,000-square-foot lots. Since land use intensity is defined by the zoning classification, a General Plan Amendment is required to change the General Plan Land Use designation from Specific Plan to R-6000. A Change of Zone from R-10,000 to R-6000 is required to facilitate TTM 38071.
Other public agencies whose approval is required	• California Regional Water Quality Control Board • Airport Land Use Commission • Eastern Municipal Water District
Have California Native American	GPA 21-05040 necessitates a Tribal consultation process in accordance with SB 18. In addition, since this development

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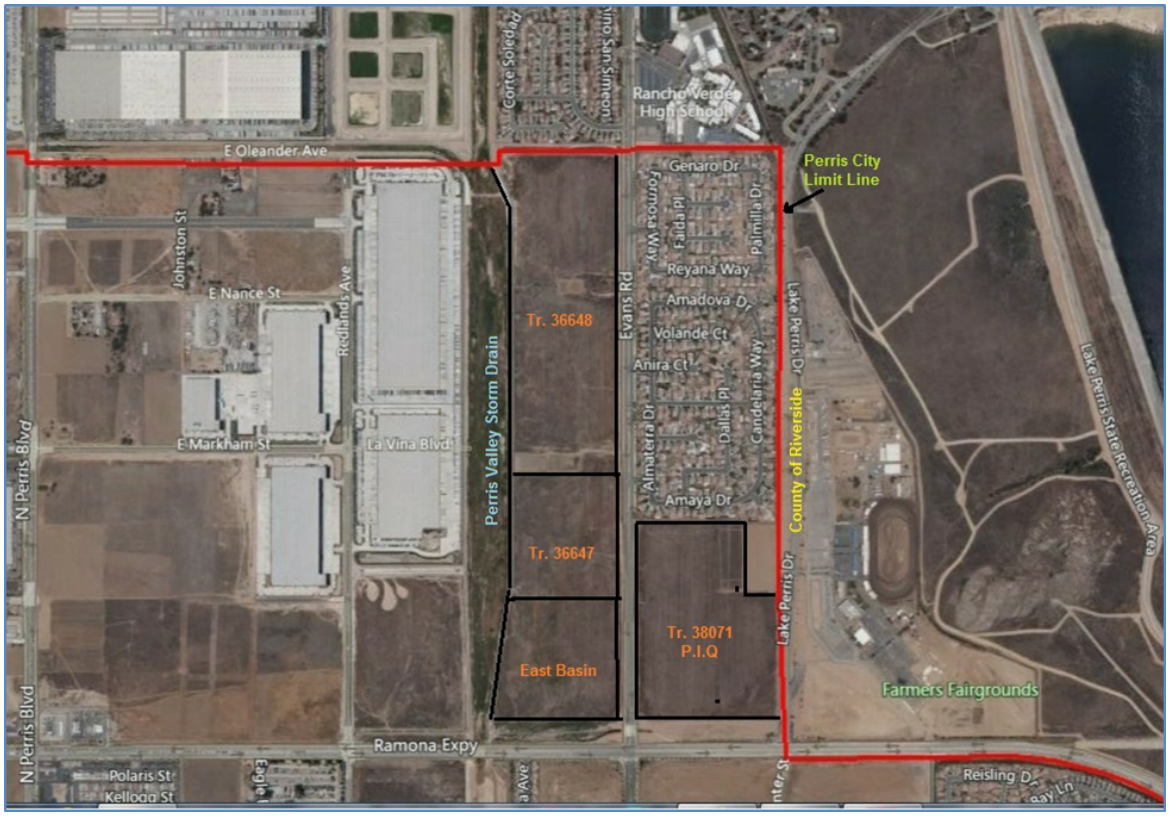
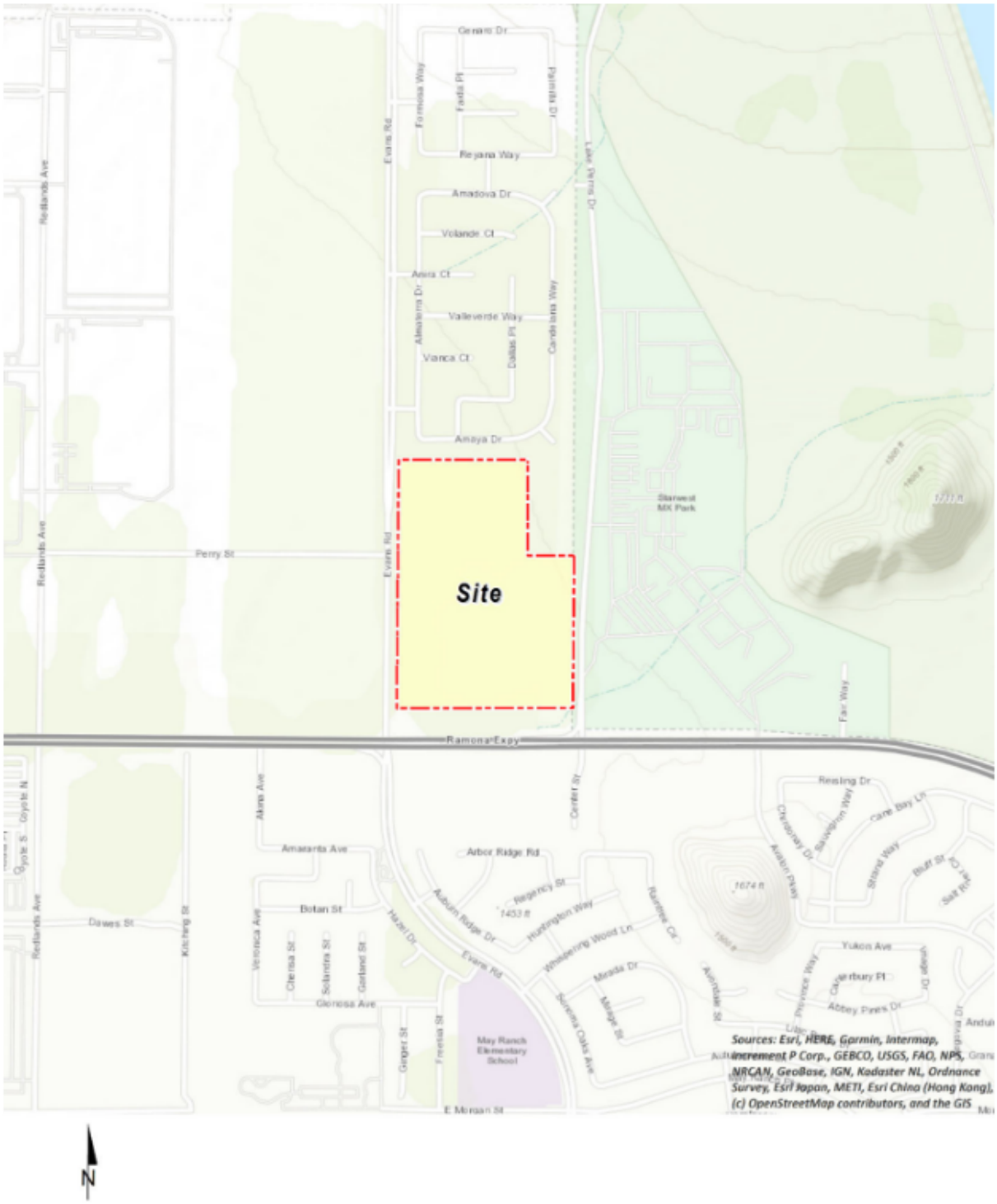
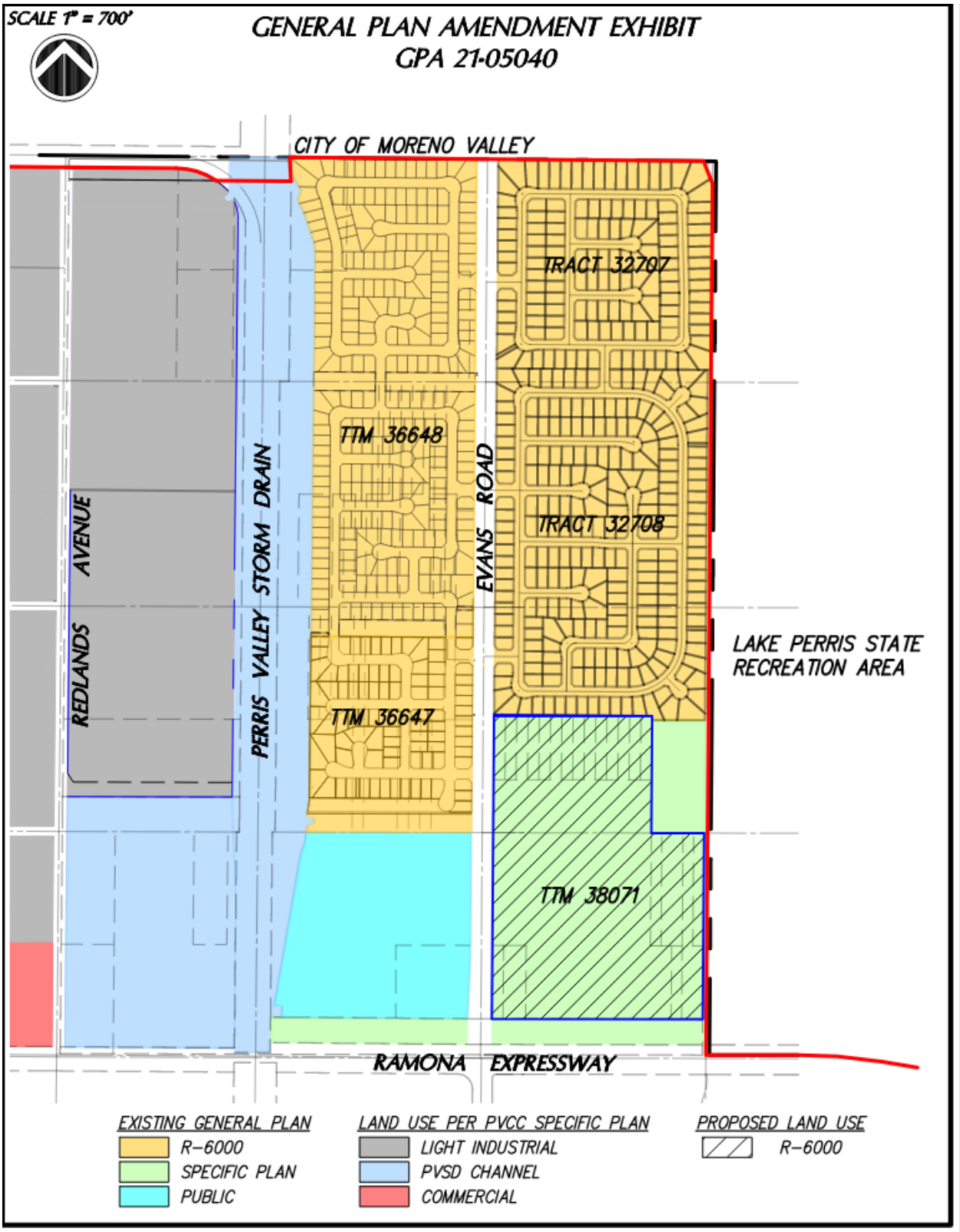
tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?	proposal is a 'project' under CEQA, a Tribal consultation is also required under AB 52. The Tribal consultation process was initiated on May 19, 2021 and requests were received from the Pechanga Band of Luiseño Indians, the Soboba Band of Luiseño Indians, the Agua Caliente Band of Cahuilla Indians, and the Rincon Band of Luiseño Indians seeking consultation by August 19, 2021. A cultural resource study was received by staff and forwarded to each tribe. The City provided a geotechnical report and proposed mitigation measures to the Rincon and Agua Caliente tribes per their requests. A second consultation notice was sent to each tribe on September 9, 2021 and no response was received. Consultation was concluded.

AERIAL PHOTO OF DEVELOPMENT



LOCATION MAP

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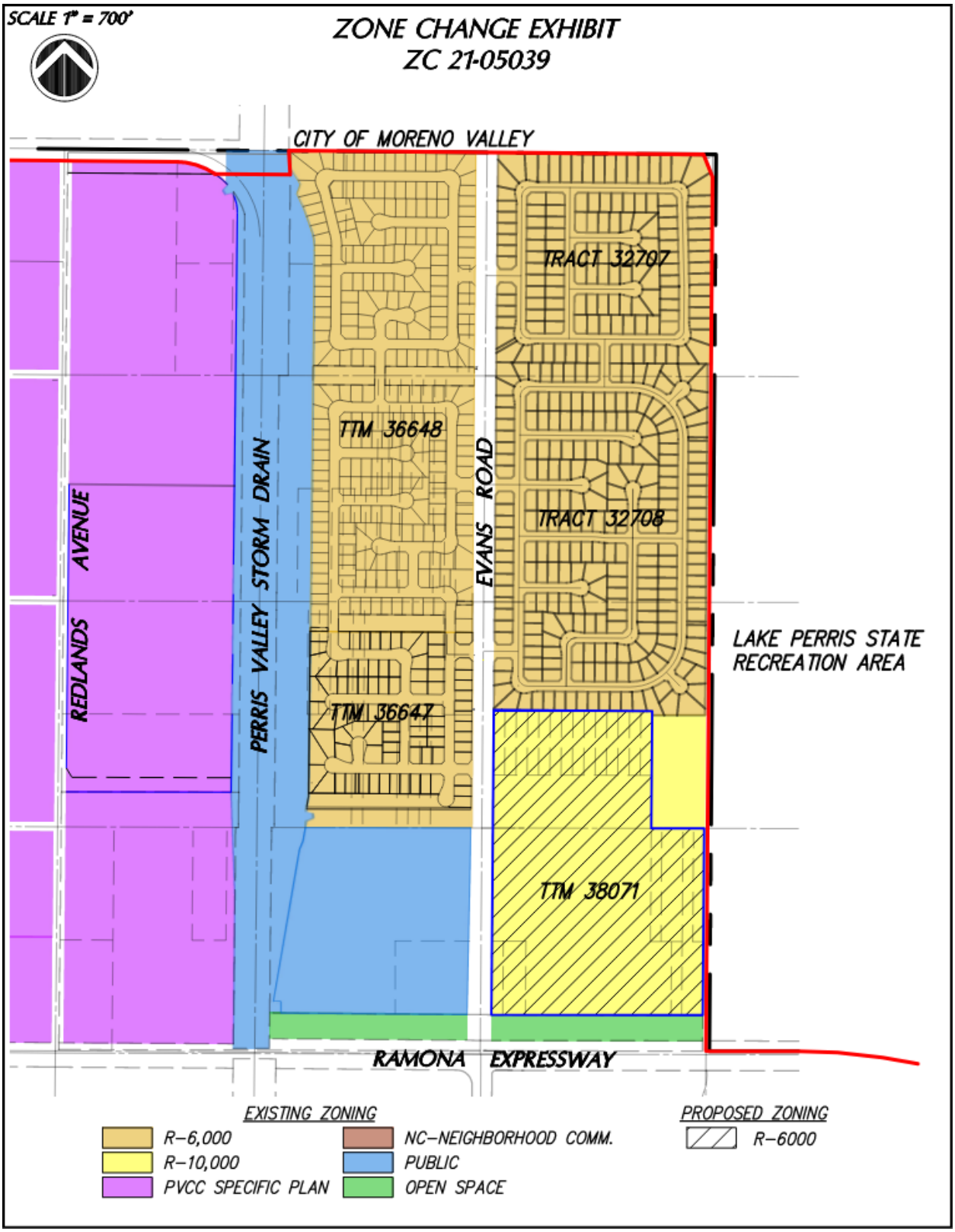
GENERAL PLAN AMENDMENT EXHIBIT
GPA 21-05040
CITY OF MORENO VALLEY
TRACT 32707
TTM 36648
TRACT 32708
EVANS ROAD
PERRIS VALLEY STORM DRAIN
REDLANDS AVENUE
LAKE PERRIS STATE RECREATION AREA
TTM 36647
TTM 38071
RAMONA EXPRESSWAY
EXISTING GENERAL PLAN
R-6000
SPECIFIC PLAN
PUBLIC
LAND USE PER PVCC SPECIFIC PLAN
LIGHT INDUSTRIAL
PVSD CHANNEL
COMMERCIAL
PROPOSED LAND USE
R-6000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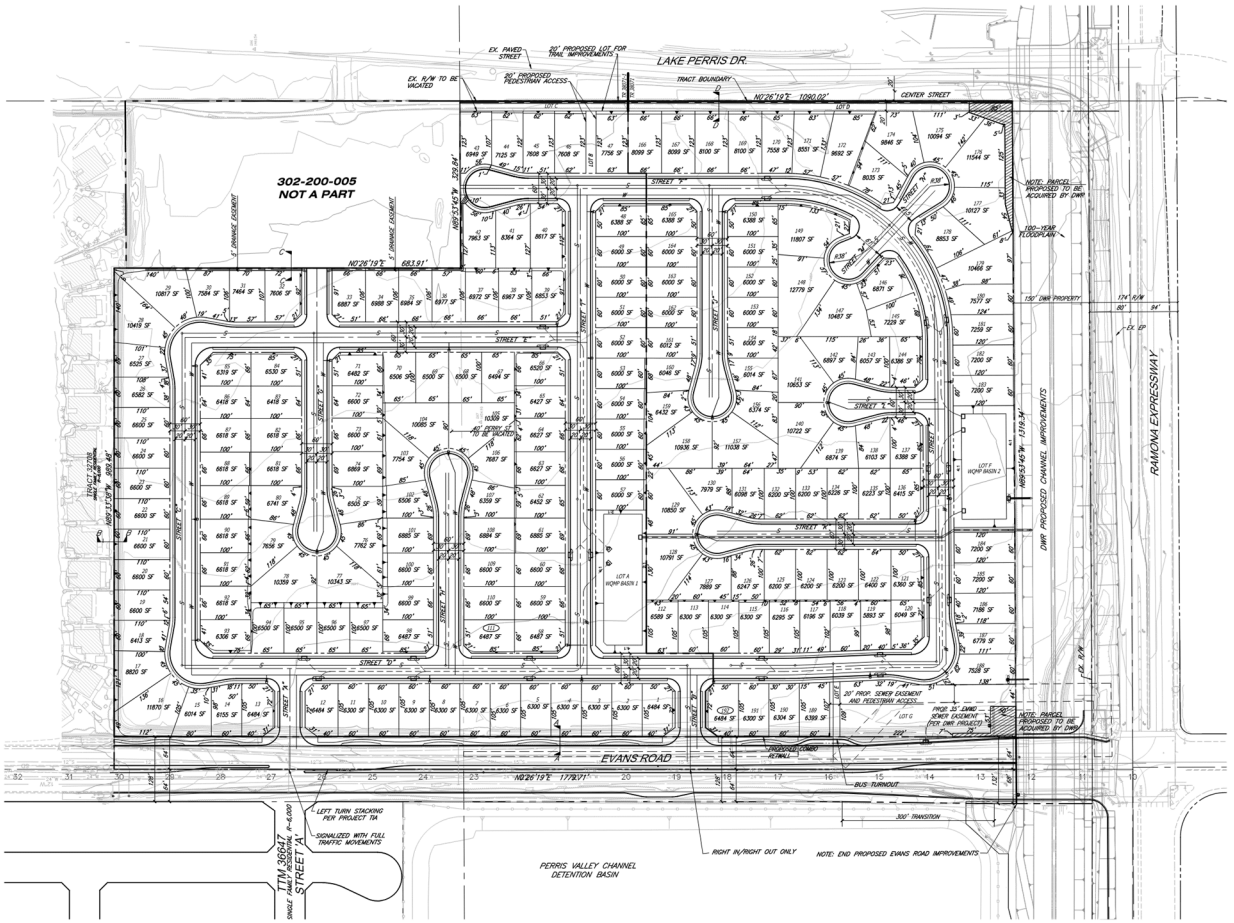
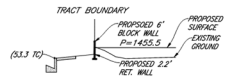
ZONE CHANGE EXHIBIT
ZC 21-05039
CITY OF MORENO VALLEY
TRACT 32707
TTM 36648
TRACT 32708
TTM 36647
TTM 38071
REDLANDS AVENUE
PERRIS VALLEY STORM DRAIN
EVANS ROAD
LAKE PERRIS STATE RECREATION AREA
RAMONA EXPRESSWAY
EXISTING ZONING
R-6,000
R-10,000
PVCC SPECIFIC PLAN
NC-NEIGHBORHOOD COMM.
PUBLIC
OPEN SPACE
PROPOSED ZONING
R-6000

TENTATIVE TRACT MAP NO. 38071





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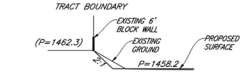

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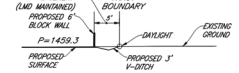

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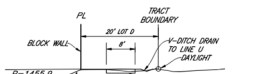

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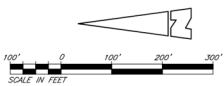

REGISTERED PROFESSIONAL ENGINEER
TODD A. TUTT
No. 64803
Exp. 6/30/21
CIVIL
STATE OF CALIFORNIA

TENTATIVE TRACT MAP NO. 38071

CITY OF PERRIS

PREPARED FOR:
STRATFORD RANCH ASSOCIATES, LLC
4100 NEWPORT PLACE, SUITE 790
NEWPORT BEACH, CA 92660
949-333-6752

KWC ENGINEERS
CIVIL ENGINEERS • PLANNERS • SURVEYORS
1880 COMPTON AVENUE, SUITE 100 • CORONA, CA. 92881-3370 • 951-734-2130

SHEET 2 OF 5 SHEETS

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

DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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

_____ _____
Signature of Lead Agency Representative Date

_____ City of Perris _____
Printed name Agency

1. **AESTHETICS**	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐

Source: Environmental Impact Report for City of Perris General Plan 2030. A PHASE I CULTURAL RESOURCES SURVEY FOR THE STRATFORD RANCH PROJECT, Brian F. Smith & Associates, *January 22, 2021*

The project site is located within a broad basin dominated by the slopes and dam face of the Lake Perris State Recreation Area located east of the site. More distant vistas include the San Bernardino Mountains to the north and Gavilan Hills to the west. The property largely contains low ruderal grasses and is otherwise devoid of physical features after having been used for dry farming for many years.

Explanation of Checklist Answers

1a. **Less Than Significant Impact.** A scenic vista can be impacted in two ways: (1) a development project can have visual impacts by either directly diminishing the scenic quality of the vista or (2) by blocking the view corridors or "vistas" of the scenic resource. The City of Perris is located within the Perris Valley, and the terrain is generally flat. According to the City's General Plan EIR (Section 4.2, Aesthetics),

The project site is an undeveloped, relatively flat parcel surrounded by a mix of residential development, industrial development, drainage facilities, public streets, and vacant lands. Title 19 of the Perris Municipal Code regulates all elements of development, including building heights. Tract 38071 will be required to comply with the provisions of Title 19.25 (R-6000 Single Family Zone. As the site is not a scenic vista nor will the project development block public views of a scenic vista, impacts will be less than significant.

1b. **No Impact.** The project site contains no trees or rock outcroppings. The cultural resource report prepared for the project identified no visible historic resources on the site. The nearest officially designated State Scenic Highway is Highway 243 located approximately 20 miles east of the project area. The absence of these resources on or near the project site results in no impact.

1c. **Less Than Significant Impact.** The proposed project lies within an urbanized area and will introduce development in residential form on a site that has historically been vacant and used for farming activities. This land use transition is consistent with development patterns on adjacent properties and has been accommodated under the Perris City General Plan. The Perris General Plan designates the property as Specific Plan, although no specific plan has been approved for the project site. The property is zoned R-10,000 and would be re-zoned as R-6000, which sets out density standards for residential development. The R-6000 is consistent with zoning on lands to the north and west. Consistency with the General Plan and compliance with the provisions of Zoning ordinance Title 19, as amended, will assure conformity with the emerging development pattern, and uniformity among developments within the project area. The standards of the R-6000 zone include building height limitations that serve to maintain scenic vistas of the nearby Perris Hills.

1d. **Less Than Significant With Mitigation.** According to the City's General Plan EIR (Section 4.2, Aesthetics), The City of Perris is largely undeveloped and a significant amount of ambient light from urban uses will be introduced with new development. The majority of new development will be located on large pieces of undeveloped land. Where development is proposed for large vacant areas, low-density residential uses would be included, which would result in new sources of light or glare.

With that expectation, the City of Perris has enacted Ordinance Number 1051. Section 19.02.110 A and B, and 19.69.030.C.5.h of the City of Perris Zoning Ordinance requires the use of certain types of light fixtures on non-residential properties This requirement minimizes the amount of light cast on adjoining properties, the public right-of-way, and into the night sky.

The City also implements Riverside County Light Pollution Ordinance 655 to restrict the permitted use of certain light fixtures through lumen power and shielding to reduce light into the night sky. The primary intent of the ordinance is the protection of astronomical observation and research.

The nature of the proposed project as a single family residential development and an interim storm water basin would not result in a significant source of new light and glare. However, the residential development will contribute to an increase in ambient light within the valley. Compliance with the provisions of Ordinance 655 will result in an operational impact that is less than significant.

During project construction, nighttime lighting may be used within the construction staging areas to provide security for buildings and construction equipment. Due to the distance between the construction area and the nearby residences and motorists on adjacent roadways, such security lights may result in glare to residents and motorists. In addition, nighttime construction lighting could affect wildlife in the adjacent SDWR Channel. However, this potential impact will be reduced to a less than significant level with implementation of mitigation measure MMA-1.

Mitigation Measure

MMA-1 Prior to issuance of grading permits, the project developer shall provide evidence to the City that any temporary nighttime lighting installed for security purposes shall be downward facing and hooded or shielded to prevent security light spillage outside of the staging area or direct broadcast of security light into the sky.

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

Sources: https://www.cityofperris.org/home/showpublisheddocument, https://maps.conservation.ca.gov/dlrp/ciff/,2018, USDA Soil Survey, 1972

Explanation of Checklist Answers

2a. **No Impact.** The project site is designated as "Farmland of Local Importance" by the State Department of Conservation**.** As such, the proposed project would not result in conversion of Farmland (Prime Farmland, Unique Farmland, or Farmland of Statewide Importance) as designated by the FMMP Program to non-agricultural use. Therefore, no impacts related to this issue would occur with implementation of the proposed project and no mitigation is required.

2b. **No Impact.** As identified in the City's General Plan, there are no agricultural zones identified by the City for the project site or any of the surrounding properties. There are also no Williamson Act contracts applicable to the project site. Because the project site is not zoned for agricultural uses and because surrounding areas are not zoned for agricultural uses, implementation of the proposed project would not conflict with existing zoning for agricultural uses nor would it conflict with any Williamson Act Contract. No impacts related to this issue would occur with implementation of the proposed project and no mitigation is required.

2c–2d. **No Impact.** The project site does not have any existing forest lands, or zoning for forest lands or timberland. Therefore, the proposed project would not conflict with existing forest zoning, cause rezoning of forest land, or result in the loss or conversion of forest lands to non-forest uses as no such resources exist in the City. Therefore, no impacts associated with this issue would occur and no mitigation is required.

2e. **No Impact.** As discussed under Thresholds 2a thorough 2d above, the project site is not categorized as Farmland (Prime Farmland, Unique Farmland, or Farmland of Statewide Importance) nor is the site designated as forest land. There is also no Farmland or forestland in the immediate vicinity of the Project site. Therefore, implementation of the Project will not result in the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use at the project site or elsewhere in Perris. Therefore, no impacts associated with this issue would occur and no mitigation is required.

3. AIR QUALITY	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Source: Urban Crossroads, STRATFORD RANCH EAST AIR QUALITY IMPACT ANALYSIS Rev. Oct. 26, 2021.

Explanation of Checklist Answers

3a. **Less than Significant Impact.** The project site is located within the South Coast Air Basin (SCAB), which is characterized by relatively poor air quality. The South Coast Air Quality Management District (SCAQMD) has jurisdiction over an approximately 10,743-square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what use to be referred to as the Southeast Desert Air Basin. Table 1 shows the attainment status of the criteria pollutants in the SCAB.

Currently, these state and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the state and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

In March 2017, the SCAQMD released the Final 2016 AQMP. The 2016 AQMP continues to evaluate current integrated strategies and control measures to meet the National Ambient Air Quality Standards (NAAQS), as well as, explore new and innovative methods to reach its goals. Some of these approaches include utilizing

incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels (35). Similar to the 2012 AQMP, the 2016 AQMP incorporates scientific and technological information and planning assumptions, including the 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements. The project's consistency with the AQMP will be determined using the 2016 AQMP as discussed below

TABLE 1: STATUS OF ATTAINMENT OF CRITERIA POLLUTANTS

Criteria Pollutant	State Designation	Federal Designation
O_3 – 1-hour standard	Nonattainment	--
O_3 – 8-hour standard	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO_2	Attainment	Unclassifiable/Attainment
SO_2	Unclassifiable/Attainment	Unclassifiable/Attainment
Pb[1]	Attainment	Unclassifiable/Attainment

"--" = The national 1-hour O_3 standard was revoked effective June 15, 2005.

Criteria for determining consistency with the SCAQMD's Air Quality Management Plan (AQMP) are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993). These indicators are discussed below:

Consistency Criterion No. 1: The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

The violations that Consistency Criterion No. 1 refers to are the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). CAAQS and NAAQS violations could occur if regional or localized significance thresholds were exceeded.

Construction Impacts – Consistency Criterion 1

Consistency Criterion No. 1 refers to violations of the CAAQS and the NAAQS. CAAQS and NAAQS violations could occur if localized significance thresholds (LSTs) or regional significance thresholds were exceeded. Based on the analysis herein compliance with SCAQMD Rule 403, the project's localized construction-source emissions would not exceed applicable regional significance thresholds or LSTs. As such, the project is consistent with the AQMP with regard to regional construction-source air quality.

Operational Impacts – Consistency Criterion 1

As evaluated, the project's localized operational-source emissions would not exceed applicable localized or regional significance thresholds. As such, the project would not result in a significant impact with respect to this criterion.

On the basis of the preceding discussion, and the lack of thresholds exceedances the project is determined to be consistent with the first criterion.

Consistency Criterion No. 2: The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.

The 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in City of Perris General Plan is considered to be consistent with the AQMP.

Construction Impacts – Consistency Criterion 2

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities.

Operational Impacts – Consistency Criterion 2

The City of Perris General Plan designates the project site Specific Plan (SP). The "Specific Plan" land use designation allows for a variety of uses, densities and building intensities on parcels of seventy-five or more acres subject to a master site plan and comprehensive development standards that provide for flexibility in design, creation of unique neighborhoods, amenities including parks and inclusion of appropriate infrastructure (38). As previously stated, the total development is proposed to consist of 197 single family detached residential dwelling units. The residential uses proposed by the project applicant are consistent with the City's land use designation and therefore, the project would not exceed the SCAG and AQMP growth projection for the City of Perris. As such, the project would not conflict or obstruct with the goals and objectives of the AQMP.

On the basis of the preceding discussion, the project is determined to be consistent with the second criterion.

AQMP Consistency Conclusion

The project would not result in or cause NAAQS or CAAQS violations, as such, the Project is considered to be consistent with the AQMP.

3b **Less than Significant Impact**. Related projects could contribute to an existing or projected air quality exceedance because the SCAB is currently nonattainment for ozone, PM_{10}, and $PM_{2.5}$. With regard to determining the cumulative impacts from new development projects, the SCAQMD uses the same significance thresholds for

project-specific and cumulative impacts for all environmental topics analyzed in an EIR. The only case where the significance thresholds for project-specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions.

Specifically, projects that generate operational or construction emissions that exceed the SCAQMD's maximum daily thresholds shown in Table 2 are considered to be cumulatively considerable. Conversely, emissions from projects that do not exceed the project-specific thresholds would not be considered to be cumulatively considerable.

The SCAQMD has developed regional and localized significance thresholds for other regulated pollutants, as summarized at Table 2. The SCAQMD's CEQA Air Quality Significance Thresholds (April 2019) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

TABLE 2: MAXIMUM DAILY EMISSIONS REGIONAL THRESHOLDS

POLLUTANT	OPERATIONS	CONSTRUCTION
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
Sox	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day

On October 17, 2017, the SCAQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the California Emissions Estimator Model™ (CalEEMod™) version 2016.3.2. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (NOx, VOC, PM_{10}, $PM_{2.5}$, SOx, and CO) and greenhouse gas (GHG) emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, CalEEMod Version 2016.3.2, (which calculates estimated emissions more conservatively than the later 2020.4.0 Version), has been used for this project to determine construction and operational air quality emissions.

On August 19, 2019, the EPA approved the 2017 version of the EMissions FACtor model (EMFAC) web database for use in SIP and transportation conformity analyses. EMFAC2017 is a mathematical model that was developed to calculate emission rates, fuel consumption, VMT from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in

future emissions from on-road mobile sources. This analysis utilizes summer, winter, and annual EMFAC2017 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season.

Because the EMFAC2017 emission rates are associated with vehicle fuel types while CalEEMod vehicle emission factors are aggregated to include all fuel types for each individual vehicle class, the EMFAC2017 emission rates for different fuel types of a vehicle class are averaged by activity or by population and activity to derive CalEEMod emission factors. The equations applied to obtain CalEEMod vehicle emission factors for each emission type are detailed in CalEEMod User's Guide Appendix A: of the Air Quality study.

Construction Impacts

Construction is expected to commence in May 2022 and will last through June 2023. The construction schedule utilized in this analysis, shown in Table 3, represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.3 The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines. The duration of construction activities was based on CalEEMod defaults and an opening year of 2023.

TABLE 3: ESTIMATED CONSTRUCTION DURATION

Phase Name	Start Date	End Date	Days
Site Preparation	05/1/2022	06/10/2022	30
Grading	06/11/2022	09/23/2022	75
Building Construction	9/24/2022	06/30/2023	200
Architectural Coating	4/10/2023	6/30/2023	65
Paving	04/17/2023	6/30/2023	55

It should be noted that residential developments typically construct several residential units at a time rather than constructing all units simultaneously. As a conservative measure, the duration of architectural coatings has been doubled to reflect the elongated schedule resulting from building the residential developments in batches.

Dust is typically a major concern during rough grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions". Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). The CalEEMod model was utilized to calculate fugitive dust emissions resulting from the project.

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

The SCAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 1113 (Architectural Coatings); Rule 431.2 (Low Sulfur Fuel); Rule 403 (Fugitive Dust); and Rule 1186 / 1186.1 (Street Sweepers).

The estimated maximum daily regional construction emissions are summarized on Table 4. As shown, the emissions from project construction would not exceed the criteria pollutant thresholds established by the SCAQMD. The construction-related impact of the project would be less than significant and not cumulatively considerable.

TABLE 4: EMISSIONS SUMMARY OF OVERALL CONSTRUCTION

Year	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer						
2022	5.19	49.03	58.46	0.10	10.12	6.08
2023	43.28	57.70	77.15	0.13	3.53	2.84
Maximum Daily Summer Emissions	**43.28**	**57.70**	**77.15**	**0.13**	**10.12**	**6.08**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
2022	5.22	49.04	58.26	0.10	10.12	6.08
2023	43.33	57.71	76.85	0.13	3.53	2.84
Maximum Daily Winter Emissions	**43.33**	**57.71**	**76.85**	**0.13**	**10.12**	**6.08**
	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod construction-source (unmitigated) emissions are presented in Appendix 3.1 of the STRATFORD RANCH EAST AIR QUALITY IMPACT ANALYSIS.

Operational Impacts

Operational activities associated with the proposed project will result in emissions of VOCs, NOx, CO, SOx, PM_{10}, and $PM_{2.5}$. Operational emissions would be expected from area source emissions, energy source emissions, and mobile source emissions.

Area source emissions include architectural coatings, consumer products, (such as detergents, cleaning compounds, polishes, personal care products, and lawn and garden products), emissions associated with use of hearths/fireplaces, and motorized landscape maintenance equipment.

Energy source emissions consist of electricity and natural gas are used by almost every project.

Mobil source emissions (vehicular impacts) are dependent on both overall daily vehicle trip generation and the effect of the project on peak hour traffic volumes and traffic operations in the vicinity of the project.

The estimated operation-source emissions are summarized on Table 5. As shown, emissions resulting from the project operations would not exceed the thresholds established by the SCAQMD for any criteria pollutant. Therefore, a less than significant project and cumulative impact would occur and no mitigation is required.

TABLE 5 OPERATIONAL EMISSIONS SUMMARY

Operational Activities – Summer Scenario	**Emissions (lbs/day)**					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Source	8.50	3.46	17.65	0.02	0.35	0.35
Energy Source	0.10	0.87	0.37	0.01	0.07	0.07
Mobile Source	4.58	11.44	43.61	0.14	14.11	3.84
Maximum Daily Emissions	**13.18**	**15.77**	**61.63**	**0.17**	**14.54**	**4.26**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Operational Activities – Winter Scenario	**Emissions (lbs/day)**					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Source	8.50	3.46	17.65	0.02	0.35	0.35
Energy Source	0.10	0.87	0.37	0.01	0.07	0.07
Mobile Source	4.38	11.86	39.00	0.14	14.53	4.26
Maximum Daily Emissions	**12.98**	**16.19**	**57.02**	**0.16**	**14.53**	**4.26**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: CalEEMod operational-source emissions are presented in Appendix 3.1 of the STRATFORD RANCH EAST AIR QUALITY IMPACT ANALYSIS.

3c. **Less than Significant Impact**. Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as “sensitive receptors”. These structures typically include residences, hotels, hospitals, etc. as they are also known to be locations where an individual can remain for 24 hours. Commercial and industrial facilities are not included in the definition of sensitive receptor because employees and patrons do not typically remain onsite for a full 24 hours but are typically onsite for eight hours or less.

Localized Emissions

This analysis makes use of methodology included in the SCAQMD Final Localized Significance Threshold Methodology (LST Methodology). The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute

or cause localized exceedances of the NAAQS and CAAQS. Collectively, these are referred to as Localized Significance Thresholds (LSTs).

The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.

LSTs were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. To address the issue of localized significance, the SCAQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. This analysis makes use of methodology included in the LST Methodology. LSTs apply to CO, NO_2, PM_{10}, and $PM_{2.5}$.

The SCAQMD's LST Methodology clearly states that "off-site 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 "on-site" emissions outputs were considered.

The "acres disturbed" for analytical purposes are based on specific equipment type for each subcategory of construction activity and the estimated maximum area a given piece of equipment can pass over in an 8-hour workday. The equipment-specific grading rates are summarized in the SCAQMD's Fact Sheet for Applying CalEEMod to Localized Significance Thresholds and CalEEMod User's Guide Appendix A: Calculation Details for CalEEMod. It should be noted that the disturbed area per day is representative of a piece of equipment making multiple passes over the same land area. In other words, one Rubber Tired Dozer can make multiple passes over the same land area totaling 0.5 acres in a given 8-hour day.

As shown in Table 6, the proposed project's construction activities could actively disturb approximately five acres per day during grading activities.

TABLE 6 MAXIMUM DAILY DISTURBED ACREAGE

Construction Phase	Equipment Type	Equipment Quantity	Acres graded per 8-hour day	Operating Hours per Day	Acres graded per day
Grading	Crawler Tractors	4	0.5	8	2.0
	Rubber Tired Dozers	3	0.5	8	1.5
Total acres disturbed per day during Site Preparation					3.5
Grading	Crawler Tractors	2	0.5	8	1.0
	Excavators	2	0.5	8	1.0
	Graders	1	0.5	8	0.5

	Rubber Tired Dozers	2	0.5		1.0
	Scrapers	2	1.0		2.0
Total acres disturbed per day during Grading					5.0

Sensitive Local Receptors

Receptors in the project study area are described below and are shown in the Exhibit on Page 21.

R1: Location R1 represents the existing residence at 825 Amaya Drive, approximately 18 feet north of the project site. Receiver R1 is placed at the private outdoor living area (backyard).

R2: Location R2 represents the existing residence at 914 Arbor Ridge Road, approximately 930 feet south of the project site. Receiver R2 is placed at the private outdoor living area (backyard).

R3: Location R3 represents the existing residence at 3899 Akina Avenue, approximately 951 feet southwest of the project site. Receiver R3 is placed at the outdoor living area (backyard).

The SCAQMD recommends that the nearest sensitive receptor be considered when determining the project's potential to cause an individual and cumulative significant impact. As such, the nearest receptor to evaluate localized impacts to PM_{10}, $PM_{2.5}$, NO_2, and CO, is the existing residential home, represented by location R1.

N

LEGEND:

Receptor Locations

Distance from receptor to Project site boundary (in feet)

SENSITIVE RECEPTOR EXHIBIT

Construction-Source Emissions LST Analysis

The SCAQMD's screening look-up tables are utilized in determining impacts. It should be noted that since the look-up tables identifies thresholds at only 1 acre, 2 acres, and 5 acres, linear regression has been utilized to determine localized significance thresholds. Consistent with SCAQMD guidance, the thresholds presented in Table 7 were calculated by interpolating the threshold values for the project's disturbed acreage.

TABLE 7: MAXIMUM DAILY LOCALIZED EMISSIONS THRESHOLDS

Pollutant	Construction Localized Thresholds[1]
NOx	270 lbs/day
CO	1,577 lbs/day
PM_{10}	13 lbs/day
$PM_{2.5}$	8 lbs/day

1 Based on 5 acres of disturbance at 25 meter distance for Source Receptor Area 24.

Table 8 identifies the localized impacts at the nearest receptor location in the vicinity of the project site. As shown, after compliance with Rule 403, localized construction emissions would not exceed the applicable SCAQMD LSTs. Therefore, the construction

TABLE 8: LOCALIZED SIGNIFICANCE SUMMARY OF CONSTRUCTION

On-Site Grading Emissions	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**56.0**	**73.5**	**10.0**	**6.0**
SCAQMD Localized Threshold	270	1,577	13	8
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Operational-Source Emissions LST Analysis

The proposed project involves the construction and operation of 192 single family residential dwelling units. According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project, if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The proposed project does not include such uses, and thus, due to the lack of significant stationary source emissions, no long-term localized significance threshold analysis is needed.

CO Hotspot Analysis

It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty 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 SCAB is now designated as attainment, as previously noted in Table 1.

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO “hot spot” analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This “hot spot” analysis did not predict any violation of CO standards.

Based on the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak CO concentrations in the SCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, a 9.3 parts per million (ppm) 8-hour CO concentration was measured at the Long Beach Boulevard and Imperial Highway intersection, which was the highest CO generating intersection within the “hot spot” analysis. However, the SCAQMD determined that only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 8.6 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. In contrast, the ambient 8-hour CO concentration within the Project study area is estimated at 1.1 ppm—1.6 ppm.

The busiest intersection evaluated for AM traffic volumes was at Wilshire Boulevard and Veteran Avenue, which had an AM traffic volume of approximately 8,062 vehicles per hour. The 2003 AQMP calculated that the highest 1-hour concentration for the intersection of Wilshire Boulevard and Veteran Avenue was 4.6 ppm. This indicates that, should the hourly traffic volume increase four times to 32,250 vehicles per hour, CO concentrations (4.6 ppm x 4 = 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm).

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 would generate approximately 1,860 trips per day and would not produce the volume of traffic required to generate a CO “hot spot” either in the context of the 2003 Los Angeles hot spot study or based on representative BAAQMD CO threshold considerations. Therefore, CO “hot spots” are not an environmental impact of concern for the proposed Project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant.

Toxic Air Contaminants

Construction Activity

During short-term construction activity, the project will also result in some diesel particulate matter (DPM) which is a listed carcinogen and toxic air contaminant (TAC) in the State of California. The 2015 Office of Environmental Health Hazard Assessment (OEHHA) revised risk assessment guidelines suggest that construction projects as short as 2-6 months may warrant evaluation. Notwithstanding, given the distance of the project site from surrounding sensitive receptors, the dominant wind patterns blowing to the northwest

away for receptors, and the annual $PM_{2.5}$ emissions from equipment during each year of construction, any DPM generated from construction activity would result in less than significant ground level concentrations of DPM and not result in a significant health risks and no further evaluation is required.

Furthermore, many air districts throughout the state, including the SCAQMD, are currently evaluating the applicability of age sensitivity factors and have not established CEQA guidance. More specifically in their response to comments received on SCAQMD New Source Review rule, the SCAQMD explicitly states that:

"The Proposed Amended Rules are separate from the CEQA significance thresholds. The SCAQMD staff is currently evaluating how to implement the Revised OEHHA Guidelines under CEQA. The SCAQMD staff will evaluate a variety of options on how to evaluate health risks under the Revised OEHHA Guidelines under CEQA. The SCAQMD staff will conduct public workshops to gather input before bringing recommendations to the Governing Board. In the interim, staff will continue to use the previous guidelines for CEQA determinations."

Operational Activities

The project consists of residential land uses, which are not known emitters of substantial TAC concentrations. The project itself does not include any significant source of TACs that would potentially affect sensitive receptors. Land uses in the vicinity of the project site include residential land uses to the north, and south. None of these land uses are typically associated with the emission of TACs. Additionally, as stated in the Air Quality and Land Use Handbook: A Community Health Perspective the concern for residential land uses is generally limited to siting new development within 500 feet of a freeway or constructing a new freeway within 500 feet of existing residences. The project site is located over 13,000 feet from I-215 and exposure of persons on the project site would be less than significant.

3d. **Less than Significant Impact**. Land uses generally associated with odor complaints include:

- Agricultural uses (livestock and farming)
- Wastewater treatment plants
- Food processing plants
- Chemical plants
- Composting operations
- Refineries
- Landfills
- Dairies
- Fiberglass molding facilities

The project is residential and does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical

solid waste (refuse) associated with the proposed project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. The proposed project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed project construction and operations would be less than significant and no mitigation is required.

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

Sources: BIOLOGICAL TECHNICAL REPORT FOR THE STRATFORD RANCH PROJECT (TENTATIVE TRACT MAP 38071), LOCATED IN THE CITY OF PERRIS, CA, Glenn Lukos Associates, Inc., Revised September 10, 2021.

Explanation of Checklist Answers

4a. **Less Than Significant Impact with Mitigation.** The proposed project is subject to state and federal regulations associated with a number of regulatory programs. These

programs often overlap and were developed to protect natural resources, including: state and federally listed plants and animals; aquatic resources including rivers and creeks, ephemeral streambeds, wetlands, and areas of riparian habitat; other special status species which are not listed as threatened or endangered by the state or federal governments; and other special-status vegetation communities. Regulatory programs include the California Endangered Species Act, Federal Endangered Species Act, and the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

Vegetation

The entire project site (48.61 acres) consists of disturbed ruderal grasses. Non-native grasses occur on the 6.97-acre adjacent offsite drainage area. Weedy species within the 48.61-acre disturbed/ruderal portion of the project site that is regularly disced that include smooth cat's ears (*Hypochaeris glabra*), stinknet (*Oncosiphon pilulifer*), black mustard (*Brassica nigra*), summer mustard (*Hirschfeldia incana*), London rocket (*Sisymbrium irio*), wild radish (*Raphanus sativus*), red-stemmed filaree (*Erodium cicutarium*), lamb's quarters (*Chenopodium album*), Russian thistle (*Salsola tragus*), nettle-leaf goosefoot (*Chenopodium murale*), cheeseweed (*Malva parviflora*), prostrate knotweed (*Polygonum aviculare* ssp. *neglectum*), wall barley (*Hordeum vulgare*), slender oat (*Avena barbata*), ripgut brome (*Bromus diandrus*), and foxtail chess (*Bromus rubens*). Native species present in the disturbed/ruderal portion of the Project include wild tarragon (*Artemisia dracunculus*), annual bur-sage (*Ambrosia acanthicarpa*), telegraph weed (*Heterotheca grandiflora*), Menzie's fiddleneck (*Amsinckia menziesii*), common cryptantha (*Cryptantha intermedia*), California croton (*Croton californicus*), vinegar weed (*Trichostema lancelolatum*), and California sun cup (*Camissoniopsis bistorta*).

The 6.97 acre off site portion of the project area features non-native grassland located south of the project. The non-native grassland areas do not appear to be routinely disked or mowed at this time. This area is primarily dominated by the following non-native species: wall barley (*Hordeum vulgare*), slender oat (*Avena barbata*), ripgut brome (*Bromus diandrus*), and foxtail chess, also referred to as red brome (*Bromus rubens*).

The project area does not contain any sensitive or special-status vegetation types identified, nor does it contain suitable habitat to support other sensitive or special status or sensitive plant communities.

Impacts to 48.61 acres of disturbed/ruderal habitat and 0.03 acre of non-native grassland would be a less-than-significant under CEQA as these habitat types are not native vegetation communities and are considered sensitive. Additionally, the project site is heavily disturbed, regularly disked, and the disturbed/ruderal habitat is composed of non-native plant species, some of which are classified as invasive.

Wildlife

Federally Listed Endangered Species
The project area lies within the historic habitat range of the Stephens Kangaroo Rat. The site has low potential to support Stephens Kangaroo Rat (SKR) in the on- and off-site habitat areas (disturbed/ruderal habitat [48.61 acres] and non-native grassland [0.03 acre] for a total impact area of 48.64 acres). The project would permanently remove 48.64 acres of potential habitat. This would be a potentially significant impact under CEQA. However, the project site occurs within the SKR Habitat Conservation

Plan (RCHCA 1996) and with fee payment to this HCP, these potentially significant impacts would be fully mitigated and reduced to a level of less than significant.

Special-Status Wildlife Species within the Project Site
The project site lies within a region known to contain species of concern or special-status species. These include the Los Angeles Pocket Mouse (LAPM), Northwestern San Diego Pocket Mouse, foraging area for the Western Mastiff Bat, Loggerhead Shrike, Northern Harrier, Golden Eagle, and White-tailed Kite. The species of concern or special-status species confirmed absent from the site is the Burrowing Owl.

The project would result in the loss of foraging habitat for golden eagle, loggerhead shrike, white-tailed kite, northern harrier, and western mastiff bat, as well as the Northwestern San Diego Pocket Mouse. The historic range of the LAMP occurs on a small portion (0.28 acres) of the project site. A focus protocol field survey was conducted from August 23 to August 28, 2021. No evidence was found that LAPM occupies any portion of the project area.

The project would permanently remove 48.64 acres of habitat for these species in their respective roles. As discussed, the lands are routinely disked and generally support disturbed, non-native habitats. The proposed impacts would be less than significant due to the heavily disturbed condition of the property and the relatively low level of sensitivity of the species. Additionally, all of these species are Covered Species under the MSHCP, with any potential impacts mitigated under the Plan.

There were no hawks and/or falcons detected over the course of the field studies; however, many common hawk and falcon species, as well as great horned owl (*Bubo virginianus*) and barn owl (*Tyto alba*) may forage the site, as no suitable nesting habitat (large shrubs, trees, marshland) is present within the project site. While the project site does not contain trees or shrubs, it does contain ground cover that may provide suitable habitat for nesting migratory birds. The proposed removal of potential habitat suitable for raptor foraging within the project area would not be a significant impact under CEQA due to the marginal quality and limited amount of potential foraging habitat removed by the proposed project.

Based on research and field investigations, the proposed project will have a less than significant impact upon any 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.

4b. **Less than Significant impact**. A total of .53 acres lies with the jurisdiction of California Department of Fish and Wildlife, (CDFW) associated with a State Department of Water Resources (SDWR) channel located south of the project site. Of this .53 acres, 0.04 acres meets the classification of a riparian stream. The SDWR Channel is 1350 feet long and approximately 16 feet wide and is either unvegetated or dominated by 0.03 acres of non-native grassland species consisting of Russian thistle (*Salsola tragus*), brome grasses (*Bromus* sp.), mustard (*Brassica nigra*), and stinknet (*Oncosiphon pilililferum*). There also a couple of western sycamore (*Platanus racemosa*) adjacent to the banks of the drainage near Lake Perris Drive. Based on the project site plans, there will be no impact to jurisdictional waters. No permanent or temporary impact to waters of the U.S. or waters of the state under Corps, Regional Board or CDFW jurisdiction would occur; therefore, no regulatory permits from any of the resource agencies would be necessary.

4c. **Less than Significant Impact with Mitigation**. A riparian/riverine/vernal pool habitat assessment was conducted for the project on February 28, 2021. The results of this analysis determined that the project site does not contain any vernal pools. The majority of the project site consists of flat disturbed/ruderal areas that are not subject to flows and do not exhibit topography that would support vernal pools. Similarly, the adjacent uplands also do not exhibit topography that would support vernal pools. The resulting impact is less than significant and no mitigation is required.

4d **No Impact**. There is no potential for wildlife nurseries to be present on the project site. The site lacks the typical structure needed such as riparian trees and/or shrubs which provide cover and protection to animals as they move through an area. There are no MSHCP Cores or Linkages adjacent to or within the project site.

4e **No Impact**. The City of Perris recognizes the healthful benefits of trees in the community and the City's Municipal Code includes Section 19.71, Urban Forestry (Ordinance 1262). The purpose of this Ordinance is to (1) establish and maintain a healthy urban forest in the City of Perris; (2) create an Urban Forestry Board to guide the City in the establishment and care of its urban forest; (3) establish guidelines for the planting, care and maintenance of trees within the City; (4) ensure the protection of trees during development and redevelopment of properties in the City; (5) avoid conflict between trees and utilities and other public improvements; and (6) identify public hazard and nuisance trees, and establish removal procedures. The intent of this Ordinance is to establish, maintain, and protect a thriving urban forest to benefit all who live, visit, or work in the City of Perris. Under this Ordinance, the Planning Commission is designated as the Urban Forestry Board and is responsible for implementing the City's tree policies and programs, and setting the direction and scope of tree-related activities (Perris 2011). There are currently no trees present on the project site; therefore, the project would not conflict with the provisions of this Ordinance. There are two western sycamore trees adjacent to the banks of the drainage near Lake Perris Drive, which will be removed. The planting and maintenance of trees as part of the project would comply with the City's Ordinance related to Urban Forestry and no significant impacts would result.

4f **No Impact**. The purpose of this section is to provide an analysis of the proposed project with respect to consistency with biological aspects of the Western Riverside County MSHCP. The project does not occur within the MSHCP Criteria Cell, Criteria Area, or Special Study Area. Therefore the acquisition of lands for the MSHCP Conservation Area is not required. Furthermore, the Project is not subject to the HANS or JPR processes**.**

Based on the project site plans, there will be no impact to jurisdictional waters. No permanent or temporary impact to waters of the U.S. or waters of the state under Corps, Regional Board or CDFW jurisdiction would occur; therefore, no regulatory permits from any of the resource agencies would be necessary.

The project will not result in temporary or permanent impact to MSHCP riparian/riverine habitat areas; therefore, no DBESP for impacting riparian/riverine habitat is required.

The project site does not occur within MSHCP Cores or Linkages and lacks wildlife nursery sites. Based on the lack of vegetation cover and open topography, no impact to wildlife movement would occur. In addition, any potential impacts to wildlife movement would be mitigated by the MSHCP.

The project site lies within the burrowing owl survey area but will not result in impacts to burrowing owls based on the results of focused surveys. The project will implement pre-construction surveys to ensure the project will not result in the direct harm of burrowing owls that could occur onsite in the future. Mitigation Measure BIO-1 is recommended to ensure consistency with the MSHCP and to ensure no direct impact to burrowing owl would occur by the project

As outlined above, the proposed project will be consistent with the biological requirements of the MSHCP. The resulting impact is less than significant.

Mitigation Measures:

BIO-1: The following avoidance measure is recommended to prevent direct harm to burrowing owls pursuant to Objective 6 of the MSHCP burrowing owl objectives:

Pre-Construction Survey. A 30-day pre-construction survey for burrowing owls is required prior to future ground-disturbing activities (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging, etc.) to ensure that no owls have colonized the site in the days or weeks preceding the ground-disturbing activities. If burrowing owls have colonized the project site prior to the initiation of ground-disturbing activities, the project proponent will immediately inform the RCA and the Wildlife Agencies and will need to coordinate in the future with the RCA and the Wildlife Agencies, including the possibility of preparing a Burrowing Owl Protection and Relocation Plan, prior to initiating ground disturbance. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure that burrowing owl have not colonized the site since it was last disturbed. If burrowing owls are found, the same coordination described above will be necessary. A qualified biologist will conduct a pre-construction presence/absence survey for burrowing owls within 30 days prior to site disturbance. If burrowing owls are detected onsite, the owls will be relocated/excluded from the site outside of the breeding season following accepted protocols, and subject to the approval of the RCA, City, and/or wildlife agencies.

5. CULTURAL RESOURCES	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Source: A PHASE I CULTURAL RESOURCES SURVEY FOR THE STRATFORD RANCH PROJECT, Brian F. Smith & Associates, *January 22, 2021.* PALEONTOLOGICAL ASSESSMENT FOR THE STRATFORD RANCH PROJECT, Brian F. Smith & Associates, *Revised November 9, 2021.* United States Department of Transportation Federal Highway Administration, the State of California Department of Transportation, and the Riverside County Transportation Commission 2015 Mid County Parkway, Riverside County, California, *08-RIV-MCP PM 0.0/16.3; 08-RIV-215 PM 28.0/34.3, EA 08-0F3200 (PN 0800000125), Final Environmental Impact Report/Environmental Impact Statement and Final Section 4(f) Evaluation Volume I.*

Explanation of Checklist Answers

5a **No Impact.** According to the State CEQA Guidelines (§15064.5b), a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect upon the environment. CEQA defines a substantial adverse change as substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. This may occur when:

a) a project alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in or eligibility for inclusion in the California Register of Historical Resources (CRHR); or

b) a project alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code (PRC) or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

c) a project that alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

A literature search was conducted to determine that historical use of the site and any physical improvements made on the property from past use. The California Native American Heritage Commission was contacted for any records of past historical or cultural use on the project site. Study was made of aerial photography for evidence of any past use and improvements on the project site. A field survey was conducted by a qualified archaeologist in search of any historic resources on the project site.

Based upon the field survey and background research conducted for the project, no structures have ever been located within the subject property. Furthermore, the properties immediately surrounding the project do not represent locations of recorded historic occupation, which also confirms the minimal potential for buried or masked cultural resources on this property. Therefore, there would be no impact resulting from the proposed project.

5b **Less than Significant Impact with Mitigation**. According to Section 15064.5(c) of the State CEQA Guidelines, CEQA applies to effects upon archaeological sites and contains the following additional provisions regarding archaeological sites:

a) When a project will impact an archaeological site, a lead agency shall first determine whether the site is a historical resource, as defined in subsection (a).

b) If a lead agency determines that the archaeological site is a historical resource, it shall refer to the provisions of Section 21084.1 of the PRC, Section 15126.4 of the guidelines, and the limits contained in Section 21083.2 of the PRC do not apply.

c) If an archaeological site does not meet the criteria defined in subsection (a) but does meet the definition of a unique archaeological resource in Section 21083.2 of the PRC, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in PRC Section 21083.2(c-f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.

d) If an archaeological resource is neither a unique archaeological nor historical resource, the effects of the project upon those resources shall not be considered a significant effect upon the environment. It shall be sufficient that both the resource and the effect upon it are noted in the Initial Study to address impacts on other resources, but they need not be considered further in the CEQA process.

A records search was conducted utilizing data obtained from the Eastern Information Center at UC Riverside. The search results identified nine cultural resource properties within one mile of the project, none of which are within the property boundaries. The following historic sources were also reviewed:

- The National Register of Historic Places Index
- The Office of Historic Preservation (OHP), Archaeological Determinations of Eligibility
- The OHP Built Environment Resource Directory
- Bureau of Land Management General Land Office records
- 1938 to 2020 aerial photographs
- 1942 USGS 15' Perris, California topographic quadrangle map
- 1953 and 1961 USGS 7.5' Perris, California topographic quadrangle maps

None of these sources identified any potential resources within the project. Based upon the located aerial photographs and USGS maps, the property has never contained any structures and appears to have been primarily utilized as an agricultural field. Based upon the results of the records search and literature review, there is limited potential for archaeological resources to be located within the project site.

A field survey was conducted by a qualified archaeologist in search of any archaeological resources on the project site. No cultural resources, either historic or prehistoric, were discovered during the survey. The lack of prehistoric sites is likely due to the absence of bedrock outcrops.

The project does not contain any natural features, such as bedrock outcrops, that are associated with prehistoric sites in this area of Riverside County. Furthermore, the properties immediately surrounding the project do not represent locations of recorded historic or prehistoric occupation, which also confirms the minimal potential for buried or masked cultural resources on this property. However, there is always a potential for subsurface artifacts to be discovered during ground-disturbing activities. Therefore,

mitigation measure CR-1 is provided to reduce the impact to a less than significant level.

5c. **Less than Significant Impact with Mitigation.** The proposed project site is vacant and has historically been used for dry farming but has been fallow land as the area has begun transitioning from agriculture to suburban residential land use. No known cemetery has occurred at this site, so it is not expected to contain human remains, including those interred outside of formal cemeteries. However, the potential exists for previously unknown human remains to be discovered at the site during project construction activities. However, in the event that human remains are discovered, mitigation measure CR-2 is provided to reduce the impact to a less than significant level.

Mitigation Measures

CR-1 Prior to the issuance of grading permits, the project proponent/developer shall retain a professional archaeologist meeting the Secretary of the Interior's Professional Standards for Archaeology (U.S. Department of Interior, 2012; Registered Professional Archaeologist preferred). The primary task of the consulting archaeologist shall be to monitor the initial ground-disturbing activities at the project site and any off-site project-related improvement areas for the identification of any previously unknown archaeological and/or cultural resources. Selection of the archaeologist shall be subject to the approval of the City of Perris Director of Development Services and no ground-disturbing activities shall occur at the project Site or within the off-site project improvement areas until the archaeologist has been approved by the City.

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

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

If any artifacts of Native American origin are discovered, all activities in the immediate vicinity of the find (within a 50-foot radius) shall stop and the project proponent and project archaeologist shall notify the City of Perris Planning Division and the Soboba Band of Luiseño Indians, the Pechanga Band of Luiseño Indians, and the Rincon Band of Luiseño Indians. A designated Native American representative from either the Soboba Band of Luiseño Indians, the Pechanga Band of Luiseño Indians, or the Rincon Band of Luiseño Indians shall be retained to assist the project archaeologist in the significance determination of the Native American as deemed possible. The designated Luiseño tribal representative will be given ample time to examine the find. The

significance of Native American resources shall be evaluated in accordance with the provisions of CEQA and shall consider the religious beliefs, customs, and practices of the Luiseño tribe. If the find is determined to be of sacred or religious value, the Luiseño tribal representative will work with the City and consulting archaeologist to protect the resource in accordance with tribal requirements. All analysis will be undertaking in a manner that avoids destruction or other adverse impacts.

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

Native American artifacts that are relocated/reburied at the project site would be subject to a fully executed relocation/reburial agreement with the assisting Luiseño tribe. This shall include, but not be limited to, an agreement that artifacts will be reburied on-site and in an area of permanent protection, and that reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist.

Native American artifacts that cannot be avoided or relocated at the project site shall be prepared for curation at an accredited curation facility in Riverside County that meets federal standards (per 36 CFR Part 79) and available to archaeologists/researchers for further study. The project archaeologist shall deliver the Native American artifacts, including title, to the identified curation facility within a reasonable amount of time, along with applicable fees for permanent curation.

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

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

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

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

If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the “Most Likely Descendent” (MLD). Despite the affiliation with any Luiseño tribal representative(s) at the project site, the NAHC’s identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of Native American human remains and may recommend to the project

proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave goods. The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains will be determined in consultation between the project proponent and the MLD. In the event that there is disagreement regarding the disposition of the remains, State law will apply and mediation with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

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

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

Source: Urban Crossroads, STRATFORD RANCH EAST ENERGY ANALYSIS, May 27, 2021.

Explanation of Checklist Answers

6a. Less than significant.

Construction Energy Demands

The estimated power cost of on-site electricity usage during the construction of the project is assumed to be approximately $9,071.37. Additionally, based on the assumed power cost, it is estimated that the total electricity usage during construction, after full project build-out, is calculated to be approximately 82,467 kWh.

Construction equipment used by the project would result in single event consumption of approximately 211,394 gallons of diesel fuel. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the project's proposed construction process that are unusual or energy-intensive, and project construction equipment would conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies.

CCR Title 13, Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Best Available Control Measures inform construction equipment operators of this requirement. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints.

Construction worker trips for full construction of the Project would result in the estimated fuel consumption of 18,652 gallons of fuel. Additionally, fuel consumption from construction vendor

and hauling trips (MHDTs and HHDTs) will total approximately 9,120 gallons. Diesel fuel would be supplied by City and regional commercial vendors. Indirectly, construction energy efficiencies and energy conservation would be achieved using bulk purchases, transport and use of construction materials. The 2020 IEPR released by the California Energy Commission (CEC) has shown that fuel efficiencies are getting better within on and off-road vehicle engines due to more stringent government requirements. As supported by the preceding discussions, project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Transportation Energy Demands

Annual vehicular trips and related VMT generated by the operation of the project would result in a fuel demand of 265,870 gallons of fuel. Fuel would be provided by current and future commercial vendors. Trip generation and VMT generated by the project are consistent with other residential uses of similar scale and configuration, as reflected respectively in the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Ed., 2017); and CalEEMod. As such, project operations would not result in excessive and wasteful vehicle trips and VMT, nor excess and wasteful vehicle energy consumption compared to other residential developments of similar size.

Operational Energy Demands

Project operational energy demands are estimated at: 3,462,490 kBTU/year of natural gas; and 1,449,800 kWh/year of electricity. Natural gas would be supplied to the project by SoCalGas; electricity would be supplied by SCE. The project proposes conventional residences reflecting contemporary energy efficient/energy conserving designs and operational programs. The project does not propose uses that are inherently energy intensive and the energy demands in total would be comparable to other industrial land use projects of similar scale and configuration. Lastly, the project will comply with the applicable Title 24 standards. Compliance itself with applicable Title 24 standards will ensure that the project energy demands would not be inefficient, wasteful, or otherwise unnecessary.

6b. Less than Significant Impact

The project's consistency with the applicable state and local plans is discussed below.

Consistency with ISTEA

Transportation and access to the project site is provided by the local and regional roadway systems. The project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because Southern California Association of Governments (SCAG) is not planning for intermodal facilities on or through the project site.

Consistency with TEA-21

The project site is located near major transportation corridors with proximate access to the Interstate freeway system. The site selected for the project facilitates access acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar uses. The project supports the strong planning processes emphasized under TEA-21. The project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21.

Consistency with IEPR

Electricity may be provided to the project by SCE. SCE's Clean Power and Electrification Pathway (CPEP) white paper builds on existing state programs and policies. As such, the project is consistent with, and would not otherwise interfere with, nor obstruct implementation the goals presented in the 2020 IEPR.

Consistency with State of CALIFORNIA ENERGY PLAN
The project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the project facilitates access and takes advantage of existing infrastructure systems. The project therefore supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan.

Consistency with California Code Title 24, Part 6, Energy Efficient Standards.
The 2019 version of Title 24 was adopted by the California Energy Commission (CEC) and became effective on January 1, 2020. The project would be developed in compliance with the 2019 Title 24 Standards. It should be noted that the CEC anticipates that, with incorporation of solar PV requirements, residential buildings will use approximately 53% less energy compared to the 2016 Energy Code.

Consistency with AB 1493
AB 1493 is not applicable to the project as it is a statewide measure establishing vehicle emissions standards. No feature of the project would interfere with implementation of the requirements under AB 1493.

Consistency with RPS
California's Renewable Portfolio Standard is not applicable to the project as it is a statewide measure that establishes a renewable energy mix. No feature of the project would interfere with implementation of the requirements under RPS.

Consistency with SB 350
The proposed project would use energy from SCE, which have committed to diversify their portfolio of energy sources by increasing energy from wind and solar sources. No feature of the project would interfere with implementation of SB 350. Additionally, the project would be designed and constructed to implement the energy efficiency measures for new residential developments and would include several measures designed to reduce energy consumption.

As shown above, the project would not conflict with any of the state or local plans. As such, a less than significant impact is expected.

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

Source: Advanced Geotechnical Services, Preliminary Geotechnical Investigation for the Stratford Ranch East Project, Tentative Tract No. 38071, City of Perris, California, March 11, 2021.

Explanation of Checklist Answers

6a(i). **No Impact**. The subject site is not located within a State of California Earthquake Fault Zone (formerly known as an Alquist-Priolo Special Studies Zone). Based on review of literature and a site reconnaissance, no active faults are known to cross the project site. Therefore, the probability of damage from direct fault rupture is considered to be negligible. However, lurching or cracking of the ground surface as a result of nearby seismic events is possible. The nearest known active faults correspond to the San Jacinto fault located 7.4 miles northeast, the Elsinore fault located 14.8 miles southwest and the San Andreas fault located 18.7 miles northeast of the site. The potential for surface rupture at the site is considered very low. No mitigation is required.

6a(ii). **Less than Significant Impact.** The potential exists for strong ground motion that may affect future improvements. At this point in time, non-critical structures (commercial, residential, and industrial) are designed according to 2019 California Building Code requirements and those of the controlling local agency.

6a(iii). **Less than Significant Impact**. The site is identified as being within a zone with high liquefaction potential by the County of Riverside. Perched groundwater conditions were encountered during the recent investigation at depths as shallow as 9.3 feet below grade. Based on our recent and previous geotechnical studies onsite and the vicinity, site soils consist of moderately dense to dense silty sands to sands, very stiff clayey silts, with infrequent clean sands. Further, loose alluvial soils are relatively shallow. The underlying very old alluvial-fan deposits are considered to be non-liquefiable due to their age and dense nature.

Accordingly, based upon the proposed remedial grading measures, the potential for post construction surface manifestation of liquefaction (sand boils, loss of bearing, etc.) is considered to be remote. It is anticipated that the site could be subject to minor amounts of dynamic settlement ranging from ½ to 1 inch with differential dynamic settlement on the order of ½ inch in 40 feet or less.**.**

6a(iv). **No Impact**. Based on review of geologic maps, literature, topographic maps, aerial photographs, and subsurface evaluation, no landslides or related features underlie or are adjacent to the project sites. Due to the flat nature of the site and surrounding areas, the potential for lateral displacement or landslides at the project site is considered negligible.

6b. **Less than Significant Impact.** Short-term construction-related erosion potential would be addressed through compliance with National Pollutant Discharge Elimination System (NPDES) permit requirements, and impacts would be less than significant.

The largest source of erosion and topsoil loss, particularly in a developed environment, is uncontrolled drainage during construction. The project site is relatively flat and surface water flows generally to the south. Also, the project site has been previously disturbed by agricultural activities and/or storage of heavy equipment and large-scale products. Ground disturbance (including over-excavation, utility trenching, and foundation excavation during construction activities on exposed soils) could lead to erosion and topsoil loss during heavy rains. Grading for the proposed project would be limited to minor cuts and fills to establish design grades and to prepare building foundations. To control erosion during construction of the project, construction activities shall be conducted in compliance with the statewide NPDES General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities. Specifically, consistent with Measure VI.A.3 of the General Plan Conservation Element, proof of the appropriate NPDES Permit (RWQCB San Jacinto Watershed Construction Activities Permit) and a Storm Water Pollution Prevention Plan (SWPPP) must be provided to the City prior to issuance of a grading permit for the project site.

Erosion during long-term project operation will result from new impervious surfaces (i.e., buildings and hardscape) and would include landscaping on the existing vacant site. Erosion potential on the site would be reduced with proposed project implementation. Therefore, with compliance with General Plan Measure VI.A.3, there would be less than significant impacts related to erosion during construction and there would be no impacts related to erosion during project operation.

Due to the presence of the dense underlying alluvial fan materials, the potential for subsidence and ground fissuring due to settlement is low. The potential for hydro-consolidation is considered remote at the subject site.

6c. **Less than Significant Impact.** The hydro-consolidation process is a singular response to the introduction of water into collapse-prone alluvial soils. Upon initial wetting, the soil structure and apparent strength are altered and a virtually immediate settlement response occurs. Based upon the results of the on site soil densities and water content of the soils only the dry, loose/soft upper 3 to 5 feet are considered to be potentially hydro-compressible*.*

6d. **Less than Significant Impact.** Samples of the near surface soil were collected during the preparation of the geotechnical study and were subjected to expansion testing. According to the test results presented in geotechnical report, the expansion potential of onsite materials ranges from “very low” to “medium” when classified in accordance with ASTM D 4829. It is our opinion that the majority of the fills derived primarily from onsite materials will have “low” to “medium” expansion potential. Foundation design recommendations presented in this report assume that as-graded soils could vary in expansion potential from “low” to “medium” Further testing should be conducted after grading completion to confirm or modify the design recommendations.

6e. **No Impact.** The project will connect to existing sewer facilities; therefore, septic tanks or an alternative wastewater disposal system would not be permitted or utilized. The proposed project would also connect to existing sewer lines and treatment facilities, and there would be no impact.

6f. **Less than Significant Impact with Mitigation.** According to the California Public Resources Code (PRC) Section 5097.5, no person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

The City of Perris Conservation Element of the City’s General Plan “provides goals and policies as a framework for the management, preservation, and use of the City’s resources”. The goals, policies, and implementation measures specific to paleontological resources are as follows:

Measure IV.A.4: In Area 1 and Area 2 shown on the Paleontological Sensitivity Map, paleontological monitoring of all projects requiring subsurface excavations will be required once any excavation begins. In Areas 4 and 5, paleontological monitoring will be required once subsurface excavations reach 5 feet in depth, with monitoring levels reduced if appropriate, at the discretion of a certified project Paleontologist. Based upon the Paleontological Sensitivity Map in the Conservation Element, the Stratford Ranch project is located within Area 4, which requires paleontological monitoring beginning at a depth of five feet.

A literature search revealed that the closest known fossil localities are located about three miles east of the project site at the Lakeview Hot Springs area on the southeast side of the Perris Reservoir. The records search was conducted by a vertebrate paleontologist in the Division of Geological Sciences at the San Bernardino County

Museum in Redlands. The project site and is underlain by some of the same sedimentary deposits.

A field survey was conducted on the project site for fossils. No fossils were discovered on the property during the field survey, which is not surprising since fossils are not usually found on the surface of flat-lying alluvial plain.

Potentially fossiliferous Quaternary very old alluvial fan deposits have been mapped across the project site. Terrestrial vertebrate fossils are known to exist at shallow depths from Quaternary older alluvial fan sediments across the Inland Empire of western Riverside County. The high paleontological sensitivity for yielding paleontological resources associated with Quaternary older alluvial fan sediment support the recommendation that paleontological monitoring be required during mass grading, trenching, and excavation activities in undisturbed Quaternary older alluvial fan sediments in order to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources. Full-time monitoring is recommended starting at a depth of five feet below the surface during earth disturbance activities, as required by the City of Perris. The proposed mitigation measure will reduce any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources (fossils) to a level that is less than significant.

GEO-1 Prior to the issuance of grading permits, the project proponent/developer shall submit to and receive approval from the City, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The PRIMMP shall include the provision for a qualified professional paleontologist (or his or her trained paleontological representative) to be on-site for any project-related excavations that exceed five (5) feet below the pre-grade surface. Selection of the paleontologist shall be subject to approval of the City of Perris Planning Manager and no grading activities shall occur at the project Site or within any off-site project improvement areas until the paleontologist has been approved by the City.

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

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

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

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

Source: Urban Crossroads, STRATFORD RANCH EAST GREENHOUSE GAS ANALYSIS, Rev. October 26, 2021.

Explanation of Checklist Answers

7a. **Less than Significant Impact**. The project is within the Southern California Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District, (SCAQMD), which is the agency responsible for air quality planning and regulation in the SCAB.

The SCAQMD's interim thresholds used the Executive Order S-3-05 year 2050 goal as the basis for the following screening level:

The lead agency can choose screening levels. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:

o Residential and Commercial land use: 3,000 metric tons of carbon dioxide equivalents ($MTCO_2e$).

For project construction emissions, GHG emissions are quantified and amortized over the life of the project. To amortize the emissions over the life of the project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life then adding that number to the annual operational GHG emissions. Therefore, project construction emissions have been amortized over a 30-year period and added to the annual operational GHG emissions. The amortized construction emissions are presented in Table 9.

TABLE 9: AMORTIZED ANNUAL CONSTRUCTION EMISSIONS

Year	Emissions (Metric tons per year)			
	CO_2	CH_4	N_2O	Total CO_2e
2022	576.09	0.14	0.00	579.57
2023	654.37	0.12	0.00	657.44
Total Annual Construction Emissions	1,230.46	0.26	0.00	1,237.01

Amortized Construction Emissions (MT CO2 e)	**41.02**	**0.01**	**0.00**	**41.23**

Source: CalEEMod™ 2016

As shown in Table 10, the project will result in a net total of approximately 2,984.22 $MTCO_2e/yr$; the proposed project would not exceed the SCAQMD/City's screening threshold of 3,000 $MTCO_2e/yr$. Thus, the project would not have the potential to resulting a cumulatively considerable impact with respect to GHG emissions. As such, a less than significant impact is expected.

Table 10 Project GHG Emissions

Emission Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Annual construction-related emissions amortized over 30 years	41.02	0.01	0.00	41.23
Area	50.63	0.00	0.00	50.99
Energy	525.87	0.02	0.01	528.30
EV Charger - Energy Demand	--	--	--	8.33
Mobile	2,212.51	0.07	0.00	2,214.19
EV Charger - Fuel Reduction	--	--	--	-37.44
Waste	46.86	2.77	0.00	116.08
Water Use	51.64	0.34	0.01	62.54
Total CO_2e (All Sources)	**2,984.22**			

Source: CalEEMod 2016, Appendix 3.1
-- = Emission factor only provided in MT CO_2e

7b **Less than Significant Impact**. The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation such as the landmark Assembly Bill (AB 32) California Global Warming Solutions Act of 2006 was specifically enacted to address GHG emissions. Other legislation such as Title 24 and Title 20 energy standards were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions.

The State has made steady progress in implementing AB 32 and achieving targets included in Executive Order S-3-05. The progress is shown in updated emission inventories prepared by ARB for 2000 through 2012 (ARB 2014a). The State has achieved the Executive Order S-3-05 target for 2010 of reducing GHG emissions to 2000 levels.

In 2016, Governor Brown SB 32 and its companion bill AB 197 that requires statewide reduction in GHG emissions to 40% below 1990 levels by 2030. This legislation builds upon AB 32 and provides an intermediate goal to achieving a statewide reduction target of 80% below 1990 levels by 2050. AB 197 created a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature.

The ARB has also made substantial progress in achieving its goal of achieving 1990 emissions levels by 2020. The ARB revised the 2020 'business as usual' (BAU) inventory forecast to account for new lower growth projections, which resulted in a new lower reduction from BAU to achieve the 1990 base. The previous reduction from 2020 BAU needed to achieve 1990 levels was 28.4 percent and the latest reduction from 2020 BAU is 21.7 percent.

In November 2017, the ARB released the final 2017 Scoping Plan Update, which identifies the State's post-2020 reduction strategy. The 2017 Scoping Plan Update reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by Senate Bill 32 (SB 32). Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce methane emissions from agricultural and other wastes. The 2017 Scoping Plan establishes a new emissions limit of 260 million $MTCO_2e$ for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

California Code of Regulations, CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went into effect on January 1, 2011, and is administered by the California Building Standards Commission (BSC). CALGreen is updated on a regular basis along with the rest of Title 24, with the most recent update being the 2019 CalGreen edition. Local jurisdictions are permitted to adopt more stringent requirements, a state law provides methods for local enhancements. CALGreen recognizes that many jurisdictions have developed existing construction and demolition ordinances and defers to them as the ruling guidance, provided they establish a minimum 65% diversion requirement. The code also provides exemptions for areas not served by construction and demolition recycling infrastructure. The State Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy, which is generally enforced by the local building official. The 2019 CALGreen standards provide a wide range of features that can be applied to the project.

The City of Perris Climate Action Plan (CAP) was adopted by the City Council (Resolution Number 4966) on February 23, 2016 (12). The CAP was developed to address global climate change through the reduction of harmful GHG emissions at the community level, and as part of California's mandated statewide GHG emissions reduction goals under AB 32. Perris's CAP, including the GHG inventories and forecasts contained within, is based on WRCOG's Subregional CAP. The Perris CAP utilized WRCOG's analysis of existing GHG reduction programs and policies that have already been implemented in the subregion and applicable best practices from other regions to assist in meeting the 2020 subregional reduction target. The CAP reduction measures chosen for the City's CAP were based on their GHG reduction potential, cost-benefit characteristics, funding availability, and feasibility of implementation in the City of Perris. The CAP used an inventory base year of 2010 and included emissions from the following sectors: residential energy, commercial/industrial energy, transportation, waste, and wastewater. The CAP's 2020 reduction target is 15% below 2010 levels, and the 2035 reduction target is 47.5% below 2010 levels. The City of Perris is expected to meet these reduction targets through implementation of statewide and local measures. Beyond 2020, Executive Order S-03-05 calls for a reduction of GHG emissions to a level 80% below 1990 levels by 2050.

Pursuant to 15604.4 of the State CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions (44). As such, the project's consistency with SB 32 (2017 Scoping Plan), is discussed below. It Consistency with AB 32 and the 2008 Scoping Plan is not necessary, since the target year for AB 32 and the 2008 Scoping Plan was 2020, and the project's buildout year for modeling is 2023. As such the 2017 Scoping Plan is the most relevant statewide plan. Project consistency with SB 32 and City's General Plan Measures, Energy Efficiency, and CAS is evaluated in the following discussion.

SB 32/2017 SCOPING PLAN CONSISTENCY

Table 11 summarizes the project's consistency with the 2017 Scoping Plan. As summarized, the project will not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories.

TABLE 11: PROJECT CONSISTENCY WITH SCOPING PLAN GREENHOUSE GAS EMISSION REDUCTION

Action	Responsible Parties	Consistency
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	Consistent. This measure is not directly applicable to development projects, but the proposed project would use energy from Southern California Edison, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		Consistent. Although this measure is directed towards policymakers, the proposed project would be designed consistent with Title 24 2019, which requires on-site renewable energy for residential development under 3 stories as well as increases in overall energy efficiency from Title 24 2016.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		Consistent. Although this measure is directed towards policymakers, the proposed project would be designed with on-site renewable energy.

Action	Responsible Parties	Consistency
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plug-in hybrid light-duty EV by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies	Consistent. These are CARB enforced standards; vehicles that access the project that are required to comply with the standards will comply with the strategy.
At least 4.2 million zero emission and plug-in hybrid light-duty EV by 2030.		Consistent. These are CARB enforced standards; vehicles that access the project that are required to comply with the standards will comply with the strategy.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		Consistent. These are CARB enforced standards; vehicles that access the project that are required to comply with the standards will comply with the strategy.
Medium- and Heavy-Duty GHG Phase 2.		Consistent. These are CARB enforced standards; vehicles that access the project that are required to comply with the standards will comply with the strategy.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO_X standard.		Not applicable. This measure is not within the purview of this project.
Last Mile Delivery: New regulation that would result in the use of low NO_X or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		Not applicable. This project is not responsible for implementation of SB 375 and would therefore not conflict with this measure.

Action	Responsible Parties	Consistency
Further reduce vehicle miles traveled (VMT) through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		Not applicable. This project is not responsible for implementation of SB 375 and would therefore not conflict with this measure.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	Not applicable. The project is not within the purview of SB 375 and would therefore not conflict with this measure.
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GO-Biz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	Not applicable. Although this is directed towards CARB and Caltrans, the proposed project would be designed to promote and support pedestrian activity on-site and in the project site area.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	Not applicable. Although this measure is directed towards policymakers, the proposed project would comply with AB 939, which sets a statewide policy that not less than 65% of solid waste generated be source reduced, recycled, or composted. Additionally, the proposed project would be required to participate in the City's recycling program and recycling collection. During construction, the proposed Project shall recycle and

Action	Responsible Parties	Consistency
		reuse construction and demolition waste per City solid waste procedures.
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	Not applicable. This measure is not withinthe purview of t his project.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.		Not applicable. This measure is not within the purview of this project.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	This measure would apply to all fuel purchased and used by the project in the state.
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	Not applicable. This measure is not within the purview of this project.
50% reduction in black carbon emissions below 2013 levels.		
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA SWRCB, Local Air Districts	Not applicable. This measure is not within the purview of this project.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	Not applicable. This measure is not within the purview of this project.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	Not applicable. This measure is not within the purview of this project.
Increase the long-term resilience of carbon storage in the land		Not applicable. This measure is not within the purview of this project.

Action	Responsible Parties	Consistency
base and enhance sequestration capacity		
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments		Not applicable. This measure is not within the purview of this project.
Establish scenario projections to serve as the foundation for the Implementation Plan		Not applicable. This measure is not within the purview of this project.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	Not applicable. This measure is not within the purview of this project.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	Not applicable. This measure is not within the purview of this project.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	Not applicable. This measure is not within the purview of this project.

As shown above, the project would not conflict with any of the 2017 Scoping Plan elements as any regulations adopted would apply directly or indirectly to the project. Further, by complying with the State's existing and proposed regulatory framework, it will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030.

CONSISTENCY WITH THE CITY OF PERRIS CAP

The City of Perris adopted its CAP in February 2016. The measures identified in the CAP represent the City's actions to achieve the GHG reduction targets of AB 32 for target year 2020. Local measures incorporated in the CAP include:

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

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

The project developer will install solar PV systems on each residence, per Title 24 requirements. The project site is located along a Riverside Transit Agency's Bus Route 9 and the project developer would install 5 residential EV Charging stations in the garages of five separate dwelling units. All other units shall be constructed with a listed raceway to accommodate a dedicated 208/240-volt branch circuit in compliance with CalGreen Code Section 4.106.4.1 to facilitate the future installation and use of EV chargers by property owners. The project will provide waste, recycling, and green waste containers for each home per City of Perris waste regulations. Based on these factors the Project would not conflict with local strategies and state/regional strategies listed in the Perris CAP. Further, the project is subject to California Building Code requirements. New buildings must achieve the 2019 Building and Energy Efficiency Standards and the 2019 California Green Building Standards requirements, which include energy conservation measures and solid waste reduction measures. While the project does not include reduced parking, increased density, or a mixed-use development, it would provide sidewalks and pedestrian walkways to encourage the use of alternative modes of transportation (walking, biking, and transit). As such, the project would not conflict with applicable GHG reduction measures in the CAP and a less than significant impact is expected to occur.

8. HAZARDS AND HAZARDOUS MATERIALS	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter-mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

8. HAZARDS AND HAZARDOUS MATERIALS	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or people residing or working in the project area?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

Source: PHASE I Environmental Site Assessment of Undeveloped Property, Assessor Parcel Numbers 302-210-001, 302-210-002, 302-210-003, 302-210-004, 302-210-007, 302-210-008, 302-210-009, 302-200-020, 302-200-021, 302-200-022, 302-200-023, 302-200-024, 302-200-025, 302-200-026, 302-200-027, 302-200-028, 302-200-029, 302-200-030, 302-200-031, 302-200-032, 302-200-034, Perris, California 92553, Earth – Strata, Inc., January 25, 2021

Explanation of Checklist Answers

8a. **Less Than Significant Impact.** The nature of the proposed project as single family residential homes will not routinely involve the transport, use, and disposal of hazardous resources on a commercial scale. Households would use chemically based products and pesticides in small amounts, which may be defined as hazardous. The local waste hauler and the County of Riverside has programs to manage the proper disposal of waste products from these materials.

8b. **No Impact**. Pursuant to the provisions specified by the *American Society for Testing and Materials (ASTM*), an evaluation shall determine “the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater or surface water of the property.” The evaluation consists of a site reconnaissance of the subject property, limited observations of adjoining properties, a review of the historical usage of the subject property, and a review of relevant documentation provided by various public and private sources (including the applicant and/or owner of the subject property) to identify conditions indicative of releases or threatened releases of hazardous substances.

Based upon the limited site reconnaissance, historical review, regulatory records review and other information detailed within the Phase One Assessment, no evidence was identified of an ASTM Recognized Environmental Conditions (RECs) or other issues in connection with the subject property.

The nature of the proposed project as single family residential homes will not create uses would not produce reasonably foreseeable upset and accident conditions that could cause a release of hazardous materials. Based on these findings, the Phase I environmental site assessment concluded that there are no RECs in association with the project site, or with surrounding properties that could adversely affect the site during grading operations.

8c. **No Impact**. The Rancho Verde High School and the May Ranch Elementary School lie within one-half mile north and south of the project site, respectively. In the absence of uses associated with the proposed project that produce, use, or transport hazardous materials, no impact upon these schools would result.

8d. **No Impact.** The Phase I Environmental Site Assessment prepared for the project in conformance with the *American Society for Testing and Materials (ASTM)*. In an effort to evaluate whether the project site and/or nearby sites have reported hazardous waste generation or hazardous material releases, regulatory information from the federal, state, and local agencies listed below were reviewed.

Federal Database	Search Range
USEPA NPL/Superfund databases:	Target Property to 1.0 mile
USEPA CERCLIS databases:	Target Property to 0.5 mile
USEPA RCRIS facilities databases	
Corrective Action Sites:	1.0 mile
TSD Facilities:	0.5 mile
Generators:	0.25 mile
USEPA ERNS database:	Target Property
US Engineering Controls:	0.5 mile
US Institutional Controls:	0.5 mile
US DOD/FUDS databases:	1.0 mile
US Brownfields:	0.5 mile
State/Local Database	**Search Range**
State Superfund databases:	
Hist Cal-Sites:	1.0 mile
CA Bond Exp. Plan	1.0 mile
State Landfills database:	0.5 mile
State Cortese	0.5 mile
State/Local LUST databases:	0.5 mile
State Spills databases:	
SLIC:	0.5 mile
CHMIRS:	Target Property
State/Local UST/AST databases:	0.25 mile
State Liens database:	Target Property
State Deed database:	0.5 mile
State VCP database:	0.5 mile
State EnviroStor/Response databases:	1.0 mile
State HAZNET database:	Target Property
Local Haz-Mat/Cleanup databases:	Target Property

This review determined that the project site is not identified on any clean-up list, either presently or in the past. Therefore, there would not be a significant hazard to the public or the environment.

8e. **Less Than Significant.** The proposed project site lies within Zone D of the March Air Reserve Base/Inland Port Airport (MARB/IPA) according to the March Air Reserve

Base / Inland Port Airport Land Use Compatibility Plan. Residential uses are allowed in Zone D with restrictions on major spectator-oriented sports stadium, amphitheaters, and concert halls, uses that involve electromagnetic radiation, and requires deed notice and disclosure to property owners. Tract 38071 has been reviewed by the Airports Land Use Commission (ALUC) (File ZAP1481MA21) and has determined that the proposed project is consistent with the 2014 March Air Reserve Base/Inland Port Land Use Compatibility Plan, subject to conditions of approval.

The Department of Defense (Air Force) completed an update to the Air Installation Compatible Use Zone (AICUZ) study for MARB/IPA in 2005. The AICUZ study was designed and is intended to aid in the development of compatible land uses in non-government areas surrounding military airfields to protect public safety and health. The AICUZ program is a composite of various factors including average noise levels; aircraft flight paths and altitudes; and accident potential, which analyzes the effects of aircraft noise, accident potential and compatible land use and development on present and future neighbors of the MARB. The noise contour map identifies the clear zone and accident potential zones, as well as the noise zones in increments of 5 decibels (dB), ranging from a Community Noise Equivalent Level (CNEL) of 60 to 80 dBA. Noise compatibility issues are further discussed in the Noise section of this Initial Study. The project site lies beyond the noise contours of the AICUZ study; meaning that the Site would be exposed to aircraft noise levels of less than 60 dBA CNEL.

The proposed project incorporates and will comply with the conditions provided by the Riverside County ALUC, the proposed project would result in a less than significant impact due to proximity to the MARB/IPA and no additional mitigation is required.

8f. **Less Than Significant Impact.** The proposed project will be conditioned to construct frontage improvements along Evans Road in compliance with the Perris General Plan Circulation Element, as well as to construct local streets within the project. The project will participate in a fair-share funding for improvements to the Ramona Expressway and regional circulation improvements. This will assure that emergency access throughout the project area will be maintained and provided in accordance with the County of Riverside's Multi-Hazard Functional Plan, and would not interfere with adopted emergency response or evacuation plans. Therefore, there would be a less than significant impact related to emergency response or evacuation plans as a result of the proposed project.

8g. **No Impact.** The project site, is not adjacent to any wildlands or undeveloped hillsides where wildland fires would be expected to occur, and the City's General Plan does not designate the project area as being at risk from wildfires (as shown on General Plan Exhibit S-16, Wildfire Constraint Areas). The project site would not be susceptible to wildfires and there would be no impact.

9. HYDROLOGY AND WATER QUALITY	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) result in substantial erosion or siltation on- or off-site.	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would increase flooding on- or offsite; or	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☒	☐	☐
d) In flood hazard tsunami, or seiche zones, tsunami, or risk release of pollutants due to flood inundation.	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Sources: PHASE I Environmental Site Assessment of Undeveloped Property, Assessor Parcel Numbers 302-210-001, 302-210-002, 302-210-003, 302-210-004, 302-210-007, 302-210-008, 302-210-009, 302-200-020, 302-200-021, 302-200-022, 302-200-023, 302-200-024, 302-200-025, 302-200-026, 302-200-027, 302-200-028, 302-200-029, 302-200-030, 302-200-031, 302-200-032, 302-200-034, Perris, California 92553, Earth – Strata, Inc., January 25, 2021, Flood Insurance Rate Map (FIRM) Panel No. 06065C1430H, Project Specific Water Quality Management Plan, KWC Engineers. Rev. October 1, 2021, Preliminary Drainage Report, Stratford Ranch Tentative Tract 38701, KWC Engineers, 2021
California Department of Water:
https://msc.fema.gov/portal/search?AddressQuery=Perris%2C%20CA#searchresultsanchor

Explanation of Checklist Answers

9a. **Less than Significant Impact.** The subject property is within the San Jacinto Groundwater Basin, underlying the San Jacinto Watershed. The San Jacinto Groundwater Basin underlies several valleys in the southwestern portion of Riverside County. The valley is drained by the South Fork of the San Jacinto River and receives an average annual precipitation ranging from about 14 to 28 inches according to the

California Department of Water Resources (DWR). Groundwater in the basin is found in Quaternary age younger and older alluvium that consists of clay, silt, sand, and gravel. Alluvial deposits may reach as about 100 feet in thickness but are more commonly less than about 45 feet thick. Groundwater is also produced from residuum and from fractured crystalline rocks below the basin (DWR). Recharge of this basin is likely from percolation of precipitation and runoff, and subsurface flow from San Jacinto Mountains and Lake Perris

A project Specific Water Quality Management Plan (WQMP) has been prepared for the project in order to comply with the requirements of the City of Perris for Water Quality Ordinance 1194. Waters potential impacted by the development include the San Jacinto River, Canyon Lake, and Lake Elsinore. Development is subject to a Statewide Construction Permit because site development involves grading more than one acre. The project proponent would be required to obtain a NPDES General Construction permit and comply with permit requirements effective at the time of construction. Grading and Building permits will be required from the City of Perris. The project is also subject to a Santa Ana MS4 Permit. The 2010 Permit requires the selection of Low Impact Development (LID) Best Management Practices (BMPs) to infiltration or harvest storm waters on site. A Bioretention/Biotreatment basin has been selected as the BMP and is designed long the southern boundary of the project to collect all surface runoff within the tract. This fulfills the requirements for LID Principles and LID BMPs to be incorporated into the site design to fully address all Drainage Management Areas. These provisions will mitigate water quality standards and waste discharge requirements to a less than significant level.

9b. **Less Than Significant Impact.** Potable water service is provided to the City of Perris by the Eastern Municipal Water District (EMWD), and the project site is located within the EMWD's Perris North groundwater sub-basin. Groundwater would not be used to serve the proposed project nor would the proposed project involve direct or indirect withdrawals of groundwater. The proposed bio-filtration system and the interim detention basin will contribute toward groundwater recharge in the area. Therefore, potential impacts would be less than significant and no mitigation is required.

9c, 9d, 9e. **Less than Significant Impact.** The project site is relatively flat, naturally sloping in a southwest direction at a 1% grade. Two drainage basins are proposed within the project. In addition, since the residential development will not be constructed until the Department of Water Resources, (DWR), has completed their project, an interim basin will be constructed by the developer that outlets surface runoff into the existing facility along the Ramona Expressway. This will assure that existing surface flows do not exceed the capacity of the existing facility. The interim facility will be removed as the permanent connection to the DWR facility is constructed. Offsite drainage improvements are proposed along the southern project boundary consisting of Line U of the RCFC Master Drainage Plan. Line U will extend westerly to a State Department of Water Resources (DWR) oversized channel to the Perris Valley Storm Drain Channel that is presently under construction. The Perris Valley Storm Drain is design to accommodate storm flows generated by development allowed under the Perris General Plan. A project SWPPP will be required to also address erosion and siltation control. Together, these will reduce the impact to a less than significant level.

9f. **Less than Significant Impact.** As discussed under Thresholds 9c and 9d above, the proposed project would result in the conversion of permeable surfaces to impermeable surfaces, which would alter the current drainage pattern of the project site. The proposed project will incorporate LID BMPs in the form of a Bioretention/Biotreatment

basin to comply with applicable regulations for the protection of water quality. These will reduce the impact to a less than significant level.

9g. **Less than Significant Impact with Mitigation.** The portion of the project site is located within Zone AE FEMA designated Flood Zone. A Letter of Map Revision (LOMR) will be required prior to the initiation of grading. The storm water runoff in the proposed condition will maintain its existing condition flow patterns and outlet discharge points. All storm drains will be sized for the 100-year flow rates. These measures will reduce the potential flooding impact to a less than significant level.

9h. **Less than Significant Impact with Mitigation.** Based on review of the Federal Emergency Management Agency (FEMA) Map, a portion of the project site is located in a designated 100-year floodplain. Implementation of the proposed project would place some structures within the 100-year flood hazard area. However, the City requires all development projects within flood areas to adhere to standards of construction specifically designed to reduce impacts associated with flooding events as indicated in Section 15.09 (Floodplain Management) of the City's Municipal Code. Such standards include the use of materials resistant to flood damage, the placement of drainage paths around structures to guide floodwaters around and away from proposed structures, and the placement of the lowest floor of any structure at or above the base flood elevation.

The proposed project site is located in an area that the City has completed the construction of several Master Planned Strom Drain facilities to protect the area from inundation by flood. Currently the City Engineer and consulting engineer are in the process of completing the necessary documentation to remove the project site and surrounding sites from the FEMA 100-year flood plain designation. Application for a Letter of Map Revision (LOMR) from FEMA would require documentation of fill material placement, elevation changes, and removal of a portion of a property from the likelihood of inundation during a flood event. Elevation of a portion of the project site above the 100-year flood zone would effectively remove potential impacts to the proposed project in regard to storm event flood hazards. Documentation submitted to the City and FEMA as well as FEMA approval would ensure that flood related impacts have been mitigated to a less than significant level for the project site.

9i. **Less than Significant Impact.** As identified in Exhibit S-15 (Dam Inundation Map) of the City's General Plan Safety Element, the project site is located in an identified dam inundation area. The project would have impacts related to flooding as a result of the failure of a levee or a dam resulting from the Lake Perris dam to the immediate northeast of the City. In July 2005, the California Department of Water Resources (DWR) identified potential seismic safety problems with Perris Dam that could result in significant damage and uncontrolled water releases in the event of a major earthquake. While there is no imminent threat to public safety, the State reduced the lake's water level to ensure maximum protection for communities downstream while Perris Dam. The finalized repair plan includes upgrading the dam by replacing the foundation materials and reinforcing it with a stability berm placed on top of the improved foundation. Repairs were completed in 2018.

In conjunction with the Perris Dam seismic safety upgrade, DWR also prepared an emergency release facility project. (SCH # 201391027). The proposed project would modify the existing structure improvements and replacing them with an automated system that makes the emergency release facility safer to operate. The emergency release structure would maintain a maximum design capacity of 3,800 cfs, but would

be operated in accordance to DWR's Perris Dam Emergency Release Facility Operations Plan to not exceed the capacity of the downstream Perris Valley Channel when operationally possible.

The proposed project is composed of three distinct sections (State Recreation Area (SRA) Segment, Fairgrounds Segment, and Western Segment). If water were released during an emergency, the released water would be directed by a levee system across the open SRA land between the dam and Ramona Expressway (SRA Segment), toward a channel across the southern end of the Lake Perris Fairgrounds (Fairgrounds Segment), and finally conveyed in a channel north of Ramona Expressway that adjoins the proposed project, to the Perris Valley Channel (Western Segment).

Therefore, although the project site is within the dam inundation zone, occurrence of flooding from the Lake Perris reservoir the proposed replacement system has been engineered to protect downstream properties within the inundation area. As a result, dam inundation impacts associated with the construction and operation of the proposed project is less than significant and no mitigation would be required.

9j. **Less than Significant Impact.** A tsunami is a series of waves generated in a body of water by a pulsating or abrupt disturbance that vertically displaces water. Seiches are oscillations in enclosed bodies of water that are caused by a number of factors, most often wind or seismic activity. Lakes in seismically active areas such as Lake Perris are at risk from seiches.

A mudslide (also known as a mudflow) occurs when there is fast moving water and a great volume of sediment and debris that surges down a slope, stream, canyon, arroyo, or gulch. Mudslides are similar to flash floods and can occur suddenly without time for adequate warning. Mudflows can ruin substantial improvements with the force of the flow itself and the burying or erosion of improvements by mud and debris. Inundation of the project site by a tsunami will not occur as the project site is located approximately 48 miles from the Pacific Ocean.

Although not located adjacent to the Pacific Ocean, the project site is located approximately 1.3 miles west from Lake Perris. Since Lake Perris is an enclosed body of water, Lake Perris could be subject to a seiche during a seismic event. However, the probability that a seiche event would affect the project site is highly unlikely as water levels in the lake would not be high enough to overtop the Perris Dam in the event of a seiche. In the remote instance that Perris Dam is overtopped due to a seiche event, any discharges would go directly into the Perris Dam flood control system before reaching the project site. It is also anticipated that the design of the Perris Dam considers seiche phenomena due to the region's high seismicity. Given these factors, impacts associated with seiche events are less than significant for the proposed project. The project site is located in a gently sloping area where landslides and mudslides would not occur.

Since the project site is not located in an area identified by the City as having slope instability, a less than significant impact associated with mudslides would occur. No mitigation would be required.

Mitigation Measure

MM HYD 1 Prior to the issuance of grading permits for the project site, the project applicant shall submit to the City supporting evidence of compliance with Riverside County Flood Control and Water Conservation District and the City of Perris Requirements and standards.

10. LAND USE AND PLANNING	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Explanation of Checklist Answers

10a. **No Impact.** The project site is undeveloped. Subdivisions of single family tracts, at the same density as the proposed project, are proposed, approved, or constructed to the north. Future single family homes are projected to the west.

10b. **Less than Significant Impact**. This section has been separated into discussions of Local Planning Programs and Regional Planning Programs.

Local Planning Programs

All activities undertaken by a planning agency must be consistent with the goals and policies of the agency's general plan. The City of Perris General Plan's Land Use Element, as adopted in August 2016, plays a central planning role in correlating all City land use issues, goals, and objectives into one set of development policies. The Land Use Element includes a Land Use Map (approved on February 18, 2008), which designates the project site as Specific Plan. However, there was never a specific plan adopted for the project area and the proposed project does not meet the 75-acre minimum specific plan parcel size. In order to establish a site-specific land use designation for the site, the General Plan requires submittal of a traffic study that demonstrates acceptable level of service (LOS) for traffic operations around a project site under build out conditions. The project traffic impact study has been provided that confirms an acceptable LOS and a General Plan Amendment has been filed to establish the R-6 6000 designation. Various elements of the General Plan include policies adopted for the purpose of avoiding or mitigating an environmental effect. The project's consistency with the key policies relevant to the project are listed in Table 12 and as shown the project would be consistent with these policies.

In addition, the project's consistency with MARB/IPA planning programs, including the Airport Land Use Compatibility Plan, is discussed in the Hazards and Hazardous Materials and Noise sections of this Initial Study.

Table 12
General Plan Policy Consistency Analysis

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
Housing Element	
Policy 1.4 Policy 1.4 Locate higher density residential development in close proximity to public transportation, services and recreation.	**Consistent**: The project applicant proposes a density of 4.05 dwelling units per acre. The project site is located within the service area of RTA that operated three bus routes in the project vicinity. The project site is less than one-quarter mile north of Morgan Park. The 15-acre park is located within May Ranch. All public services are available to project residents within the city. The project is consistent with and meets Policy 1.4.
Policy 1.5 Promote construction of units consistent with the new construction needs identified in the Regional Housing Needs Assessment (RHNA).	Consistent: The project proposes 192 market rate single-family detached residential units. Based on Table III-1 of the City of Perris 2014-2021 Housing Element the proposed market rate units proposed by the project applicant are Above Moderate income category. The project would provide 192 units towards the city's total quantified number of 1,814 Above Moderate units. Therefore, the project would assist the city towards meeting its' RHNA number. The project is consistent with and meets Policy 1.5.
Policy 3.4 Ensure that water and sewer providers are aware of the City's intentions for residential development throughout the city.	**Consisten**t: On December 2, 2021, the EMWD issued a Will Serve letter stating that the city is willing to provide water and sewer service to the project. The project is consistent with and meets Policy 3.4.
Policy 5.3 Encourage compatible design of new residential units to minimize the impact of intensified reuse of residential land on existing residential development.	**Consistent:** Although the Policy is now pre-empted by state law under SB 35, SB 9, and SB 10, the project site is vacant and has not been developed. The project is not a reuse of residential land, but rather new residential development on vacant land. The project design is consistent with the adjacent surrounding development in terms of density. The project is consistent with and meets Policy 5.3

Policy 6.1 Policy 6.1 Comply with all adopted federal and state actions to promote energy conservation.	**Consistent**: As discussed in Section 6 of this Initial Study/MND the project would be required by the City to comply with the applicable provisions of Title 24 and the CALGreen Code, including residential mandatory measures that include water efficiency and conservation, material conservation and resource efficiency, environmental quality, etc. The project is also required to comply with all applicable state regulations pertaining to waste reduction and recycling and applicable city ordinances. As such, the project would be designed to reduce wasteful, inefficient, and unnecessary consumption of energy. The project is consistent with and meets Policy 6.1.
Land Use Element	
Policy I.A Promote variety in dwelling types, densities and locations to satisfy changing demands as the community evolves and matures.	**Consistent:** The project applicant proposes one and two-story single-family dwelling units at a density of 4.05 dwelling units per acre in the eastern portion of the city along the Ramona Expressway that intersects with the I-215 freeway. The project is consistent with and meets Policy I.A
Policy II. **A** New development consistent with infrastructure capacity and municipal services capacities.	Consistent: All required infrastructure, including sewer, water, storm drains, roads, electricity, and natural gas are located in the streets adjacent to the project site and would be extended to the project site. The landfill that would serve the project has adequate capacity to serve the project into the future. As discussed in Sections 14 and 18 of this Initial Study/MND the existing public services and utilities have adequate capacity to serve the project to a less than significant level. As discussed in Section 16 of this Initial Study/MND the roadways that would serve the project have capacity to serve the project to a less than significant level. Therefore, the project is consistent with and meets Policy II.A
Policy II.B Require new development to include school facilities or pay school impact fees, where appropriate.	**Consistent:** As discussed in Section 14 of this Initial Study/MND, as required by Government Code Section 65995, the project developer would be required by state law pay the required developer fee to the Val Verde Unified School District

	prior to the issuance of building permits. Therefore, the project is consistent with and meets Policy II.B
Policy V.A Policy V.A Restrict development in areas at risk of damage due to disasters.	**Consistent:** As discussed in Section 8 of this Initial Study/MND there are no hazardous materials on the site that would damage and impact the project. Per Section 9 of this Initial Study/ MND the project site is not located in a flood hazard zone and would not be exposed to a hazard associated with a tsunami or seiche. Per Section 19 of this Initial Study/MND the project site is not located within a High or Very High Fire Hazard Severity Zone. Therefore, the project would not be at risk due to a disaster and is consistent with and meets Policy V.A.
Circulation Element	
Policy I.A Design and develop the transportation system to respond to concentrations of population and employment activities, as designated by the Land Use Element and in accordance with the designated Transportation System, Exhibit 4.2 Future Roadway Network.	**Consistent:** The project is consistent with the residential land use planned for the project site in the Land Use Element of the General Plan. All roadway improvements proposed by the project applicant are consistent with the transportation system that is proposed for the area by the Circulation Element and would serve the project. The project is consistent with and meets Policy I.A.
Policy II.B Maintain the existing transportation network while providing for future expansion and improvement based on travel demand, and the development of alternative travel modes.	**Consistent:** The project applicant proposes to maintain the existing transportation network that currently serves the project site vicinity. The project applicant proposes mitigation measures to mitigate project impacts at the impacted intersections to allow for expansion and based on cumulative development that would be served by those four intersections based on future travel demand, which could include alternative travel modes. The project will also pay TUMF fees for regional transportation system improvements, including the Ramona Expressway. The project is consistent with and meets Policy II.B.
Policy III.A To financially support a transportation system that is adequately maintained.	**Consistent:** The project applicant would financially support the transportation system through TUMF fees, to pay the project's fair share of the cost to maintain and improve the impacted intersection operations within Perris.

	The project is consistent with and meets Policy IIIA.
Conservation Element	
Policy II.A Comply with state and federal regulations to ensure protection and preservation of significant biological resources.	**Consistent:** As discussed in Section 4 of this Initial Study/MND the project would result in an impact to MSHCP plant and animal species. As required by Ordinance No. 1123 the project developer must pay the required MSHCP fee to mitigate the potential biological resource impacts by the project. The payment of the required MSHCP fee would reduce potential biological impacts to plant and animal species to a less than significant level. The project would not impact any other state or federal regulations regarding biological resources. The project is consistent with and meets Policy II.A.
Policy III.A Review all public and private development and construction projects and any other land use plans or activities within the MSHCP area, in accordance with the conservation criteria procedures and mitigation requirements set forth in the MSHCP.	**Consistent:** As discussed in Section 4 of this Initial Study/MND the project would result in an impact to MSHCP plant and animal species. As required by Ordinance No. 1123 the project developer must pay the required MSHCP fee to mitigate the potential biological resource impacts by the project. The payment of the required MSHCP fee would reduce potential biological impacts to a less than significant level. The project is consistent with and meets Policy IIIA.
Policy IV.A Comply with state and federal regulations and ensure preservation of the significant historical, archaeological and paleontological resources.	**Consistent:** As discussed in Section 5 of this Initial Study/MND no historical or cultural resources were identified on the site during an on-site survey. There may be a potential for subsurface cultural resources that could be impacted during project grading and construction. As a result, mitigation measures in compliance with state and federal regulations are recommended to reduce potential impacts to cultural resources during grading that may exist on the site to a less than significant level. The project is consistent with land meets Policy IV.A.
Policy V.A Coordinate land-planning efforts with local water purveyors.	**Consistent:** On December 2, 2021, the EMWD issued a Will Serve letter stating that it is willing to provide water and sewer service to the project subject to subject to EMWD rules and regulations.

	The Will Serve letter is proof that the project applicant has coordinated the local water purveyor. Therefore, the project is consistent with and meets Policy V.A.
Policy VI.A Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).	**Consistent:** As stated in Section 6 of this Initial Study/MND the short-term erosional impacts associated with project construction would be minimized through compliance with standard erosion control practices and an NPDES permit that is required by the state. The City would require the project developer to prepare a Storm Water Pollution Prevention Plan (SWPPP) in accordance with California State Water Resources Control Board (State Water Board), Construction Activities General Permit (State Water Resources Board Order No. 2012-0006-DWQ, NPDES No. CAS000002). The City would require that the project complies with all applicable requirements of the NPDES before any permits would be issued. The project is consistent with and meets Policy VI.A.
Policy VII.A Preserve significant hillsides and rock outcroppings in the planning areas.	**Consistent:** There are no areas on the project site with significant rock outcroppings. Therefore, the proposed project is consistent with Policy VII.A.
Policy VIII.A Adopt and maintain development regulations that encourage water and resource conservation.	**Consistent**: As identified in Section 18 of this Initial Study, the project would be required to meet and comply with all applicable water conservation measures, including efficient landscape irrigation requirements and would include, but not be limited to: plants with low water usage; a high-efficiency drip irrigation system, with minimal or no overhead spray sprinklers; and an evapotranspiration/weather based smart controller using daily updated weather data. The EMWD has adopted water use efficiency standards. The City of Perris has adopted Landscape Ordinance (Chapter 19.70 to regulate water use efficiency The project is consistent with and meets Policy VIII.A with these provisions in place.
Policy VIII.B Adopt and maintain development regulations that	**Consistent:** As discussed in Section 18 of the Initial Study/MND the 2016 CalGreen Code requires that 65 percent

encourage recycling and reduced waste generation by construction projects.	of construction waste be diverted from landfills. As required, 65 percent of the construction waste generated by the project would have to be diverted from the landfill. In addition, the project would be required to comply with applicable practices enacted by the City under the California Integrated Waste Management Act of 1989 (AB 939) and any other applicable local, State, and federal solid waste management regulations. AB 939 requires all counties to prepare a County Integrated Waste Management Plan. The County of Riverside adopted its Countywide Integrated Waste Management Plan (CIWMP) in 1998. The CIWMP includes the Countywide Summary Plan; the Countywide Siting Element; and the Source Reduction and Recycling Elements, the Household Hazardous Waste Elements, and Non-disposal Facility Elements for Riverside County and each city in Riverside County. The project is consistent with and meets Policy
Policy VIII.C Adopt and maintain development regulations which encourage increased energy efficiency in buildings, and the design of durable buildings that are efficient and economical to own and operate. Encourage green building development by establishing density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who meet LEED building standards for new and refurbished developments (U.S. Green Building Council's Leadership in Energy and Environmental Design green building programs).	**Consistent:** The project would be required by the City to be consistent with and meet all applicable energy efficient building standards. The project meets Policy VIII.C.
Policy IX.A Encourage land uses and new development that support alternatives to the single occupant vehicle.	**Consistent:** The greater project area is served by Riverside Transit Agency (RTA). RTA Route 19 travels along Perris Boulevard in the project area and RTA Route 41 travels east along Ramona Expressway to Perris Boulevard then south along Perris Boulevard in the project area. The proposed project will not conflict with policies that support public transit as

	Perris Boulevard and Ramona Expressway will still operate as a designated bus route for RTA to provide mass transit. RTA may elect to establish a bus stop along Evans Rd. at the project site based on future rider demand. Perris General Plan Circulation Element Exhibit CE-14: Perris Future Recreation Trail Systems shows a Regional Hiking, Bicycle, Equestrian Trail along Evans Road. This trail shall be incorporated within the Evans Road parkway improvement plans and constructed as part of the frontage road improvements pursuant to mitigation measure TRA-02, which will result in a less than significant impact. The project is consistent with and meets Policy IX.A.
Policy X.A Establish density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who exceed current Title 24 requirements for new development.	**Consistent**: The project applicant proposes to meet Title 24 energy requirements. Therefore, the project applicant is not requesting a density bonus or expedited permitting. The project is consistent with and meets Policy X.A
Policy X.B Encourage the use of trees within project design to lessen energy needs, reduce the urban heat island effect, and improve air quality throughout the region.	**Consistent:** The project applicant proposes to plant trees throughout the project to lessen energy needs, reduce the urban heat island effect and incrementally improve air quality. The project is consistent with and meets Policy X.B.
Noise Element	
Policy I.A The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development.	**Consistent:** As identified in Section 12 of this Initial Study, the noise levels of the project meet and complies with the City of Perris noise criteria and the requirements of the State of California Noise/Land Use Compatibility Criteria. The project is consistent with and meets Policy I.A.
Policy IV.A Reduce or avoid the existing and potential future impacts from air traffic on new sensitive noise land uses in areas where air traffic noise is 60 dBA CNEL or higher.	**Consistent**: As shown in Exhibit N-3 of the Noise Element the project site is outside of the 60 dBA CNEL or higher noise contour of the March Air Reserve Base/Inland Port Airport located west of the project site. The project is consistent with and meets Policy IV.A.

Safety Element	
Policy I.B. The City of Perris shall restrict future development in areas of high flood hazard until it can be shown that risk is or can be mitigated.	**Consistent:** Based on Exhibit S-6 of the City of Perris Safety Element the project site is located in Zone A and Zone X based on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map dated July 1992. Improvements underway to the Perris Channel will lead to the project site being designated as Zone X. Therefore, project is consistent with and meets Policy I.B.
Policy I.C. Reduce the risk of damage from fires.	**Consistent**: As discussed in Section 19 of this Initial Study/MND the City of Perris adopted Ordinance No. 1336 that modified the 2016 California Fire Code. Specifically, Ordinance No. 1336 modified Chapter 49 Requirements for Wildland-Urban Interface Fire Areas of the Fire Code to add Section 4908 Fuel Modification Requirements for New Construction that requires, "All new buildings to be built or installed in hazardous fire areas shall comply with a list of specific fire protection requirements." The proposed project is not located within a hazardous fire area. Therefore, the project is consistent with and meets Policy I.C.
Policy I.D. Consult the AICUZ Land Use Compatibility Guidelines and ALUP Airport Influence Area development restrictions when considering development project applications.	**Consistent:** Based on Exhibit S-18 of the City of Perris Safety Element and map MA-1 of the March Air Reserve Base/ Inland Port Airport Land Use compatibility Plan adopted on November 13, 2014 the project site is located is split between Zone D and Zone E. The proposed project complies with the limits of Zone D and Zone E has no limits or restrictions to the density of residential development proposed for the site. Based on Exhibit S-19 of the City of Perris Safety Element the project site is located outside of the Perris Valley Airport Influenced Area. The project is consistent with and meets Policy I.D.
Policy I.E. All development will be required to include adequate protection from damage due to seismic incidents.	**Consistent:** As discussed in Section 5 of this Initial Study/MND the project would be designed and constructed according to the current California Building Codes (CBC), which require structures to be designed to meet or exceed the seismic safety standards in

	the CBC. The project is consistent with and meets Policy I.E.
Policy II.A. The City shall require roadway improvements to expedite quick and safe travel by emergency responders.	**Consistent:** All project roadway improvement plans would be reviewed and approved by the City Engineer for compliance with city roadway design standards prior to the issuance of a building permit. The project is consistent with and meets Policy II.A.
Open Space Element	
Policy I.B. Developers will only receive credit for parkland dedication requirements for actual land used for, in lieu-fees contributed to, or improvements made upon active parkland.	**Consistent:** The City will require the project applicant to pay an in-lieu parkland fee
Policy III.A Preserve hillsides and rock outcroppings in the planning areas.	**Consistent:** The project site does not include and significant rock outcroppings. Therefore, the project is consistent with and meets Policy III.A
Healthy Community Element	
Policy HC 6.3 Promote measures that will be effective in reducing emissions during construction activities: • Perris will ensure that construction activities follow existing South Coast Air Quality Management District (SCAQMD) rules and regulations. • All construction equipment for public and private projects will also comply with California Air Resources Board's vehicle standards. For projects that may exceed daily construction emissions established by the SCAQMD, Best Available Control Measures will be incorporated to reduce construction emissions to below daily emission standards established by the SCAQMD. • Project proponents will be required to prepare and implement a Construction Management Plan which will include Best Available Control Measures among others. Appropriate control measures will be determined on a project by project basis, and should be specific to the pollutant for which the daily threshold is exceeded.	**Consistent:** The Air Quality and GHG Impact Analysis that was prepared for the proposed project evaluated project construction and operational emissions to thresholds adopted by SCAQMD. Based on SCAQMD thresholds, the project would not exceed any SCAQMD air emission thresholds during construction or the operational life of the project. The project applicant would prepare a Construction Management Plan as required by the City. The project is consistent with and meets Policy HC 6.3.

Because the project complies with the General Plan and zoning the project would not conflict with the General Plan or any policies or regulations for the development of the proposed 192 residential units. The project would not have any land use or planning impacts.

Regional Planning Programs

With respect to regional planning, the Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization (MPO) for six counties: Riverside, Los Angeles, Orange, San Bernardino, Ventura, and Imperial. As the designated MPO, the federal government mandates SCAG to research and draw up plans for transportation, growth management, hazardous waste management, and air quality. The policies and strategies of SCAG's regional planning programs, including the *2012 Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS)* (adopted in April 2012 and supersedes the 2008 RTP), are applicable to the proposed project.

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

Source: Figure OS-5 of the Riverside County General Plan

Explanation of Checklist Answers

11a, 11b. **No Impact.** As identified in the PVCC Specific Plan EIR Initial Study:

Figure OS-5 of the Riverside County General Plan shows that the proposed project site is located within Mineral Resource Zone 3 (MRZ-3), as classified by the State Mining and Geology Board (SMGB). MRZ-3 is classified as an area where the available geologic information indicates that mineral deposits exist or are likely to exist; however, the significance of the deposit is undetermined. No sites within the City of Perris City limits have been designated as locally important mineral resource recovery sites in the Perris General Plan or County of Riverside General Plan. Accordingly, no impact to availability of a locally-important mineral resource recovery site would occur. No impacts are anticipated.

12. NOISE	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

Source: http://marchjpa.com/documents/docs_forms/aicuz_2005.pdf. http://www.cityofperris.org/city-hall/general-plan/General_Plan_2030.pdf. Urban Crossroads, Stratford Ranch East, (TTM 38071) (PLN21-05032/GPA21-05040/CZ21-05039) Noise Impact Analysis, City of Perris, May 12, 2021

Explanation of Checklist Answers

12a. **Less than Significant Impact.** Noise impacts shall be considered significant if any of the following occur as a direct result of the proposed development. Table 13 shows the significance criteria summary matrix.

TABLE 13

Significance Criteria Summary

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site	Noise-Sensitive[1]	if ambient is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase	
		if ambient is 60 - 65 dBA CNEL	≥ 3 dBA CNEL Project increase	
		if ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL Project increase	
Construction	It is unlawful for any person 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 to erect, construct, demolish, excavate, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise.[2]			
	Noise-Sensitive	Noise Level Threshold[2]	80 dBA L_{max}	n/a
		Vibration Level Threshold[3]	0.3 PPV (in/sec)	n/a

[1] FICON, 1992.
[2] City of Perris Municipal Code, Section 7.34.060 (Appendix 3.1).
[3] Caltrans Transportation and Construction Vibration Manual, April 2020 Table 19.
"Daytime" = 8:00 a.m. - 10:00 p.m.; "Nighttime" = 10:01 p.m. - 7:59 a.m.; "PPV" = Peak Particle Velocity

Construction Noise

The proposed project will generate noise during construction relating to site preparation, earth-moving, construction, paving, and architectural coating stages. The City of Perris Municipal Code, Section 7.34.060, identifies that it "is unlawful for any person between the hours of 7:00 PM of any day and 7:00 AM of the following day, or on a legal holiday, with the exception of Columbus Day and Washington's birthday, or on Sundays to erect, construct, demolish, excavate, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise. Construction activity shall not exceed 80 dBA in residential zones in the city." A significant construction noise impact would result for any construction activity that is not in compliance with these requirements.

To assess the worst-case construction noise levels, the Project construction noise analysis relied on the highest noise level impacts when the equipment with the highest reference noise level is operating at the closest point from the edge of primary construction activity (project site boundary) to each receiver location. The nearest receiver is residences along the north boundary. As shown on Table 14, the construction noise levels are expected to range from 56.0 to 76.8 dBA Lmax, and the highest construction levels are expected to range from 64.0 to 76.8 dBA Lmax at the nearest receiver locations. The calculated maximum noise level at the nearest receiver (residences along the northern boundary) would be 76.8 $L_{max.}$ Construction noise levels would be below the standard of 80 L_{max} contained in Section 7.34.040 of the Perris Municipal Code. In addition, construction activities would be restricted to between the hours of 7:00 PM of any day and 7:00 AM of the following day, or on a legal holiday, with the exception of Columbus Day and Washington's birthday, or on Sundays. Therefore, the noise impact of the project during construction would be less than significant.

Table 14
Typical Construction Equipment Noise level Summary

Receiver Location[1]	Construction Noise Levels (dBA L_{max})					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	74.8	76.8	69.8	69.8	68.8	76.8
R2	63.0	65.0	58.0	58.0	57.0	65.0
R3	62.0	64.0	57.0	57.0	56.0	64.0

Roadway Noise

An analysis of existing traffic noise levels plus traffic noise generated by the proposed project has been conducted to fully analyze all the existing traffic scenarios identified in the Traffic Impact Analysis prepared by Urban Crossroads, Inc. However, the analysis of existing off-site traffic noise levels plus traffic noise generated by the proposed Project scenario will not actually occur since the project would not be fully constructed and operational until Year 2027 conditions. Table 15 shows that the project off-site traffic noise level increases range from 0.0 to 0.1 dBA CNEL on the study area roadway segments. Based on the significance criteria for off-site traffic noise presented in Table 13, land uses adjacent to the study area roadway segments would experience less than significant noise level increases on receiving land uses due to the project-related traffic.

TABLE 15
Existing with Project Traffic Noise level Increases

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[2]			Incremental Noise Level Increase Threshold[3]	
				No Project	With Project	Project Addition	Limit	Exceeded?
1	Redlands Av.	s/o Ramona Exwy.	Sensitive	59.3	59.3	0.0	5.0	No
2	Evans Rd.	n/o Street A	Sensitive	70.5	70.6	0.1	1.5	No
3	Evans Rd.	s/o Ramona Exwy.	Sensitive	69.3	69.3	0.0	1.5	No
4	Ramona Exwy.	w/o Redlands Av.	Sensitive	71.0	71.1	0.1	1.5	No
5	Ramona Exwy.	w/o Evans Rd.	Sensitive	71.6	71.7	0.1	1.5	No
6	Ramona Exwy.	e/o Evans Rd.	Sensitive	70.0	70.1	0.1	1.5	No

[1] Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.
[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.
[3] Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4-1)?

An analysis of noise levels associated with existing traffic volumes plus ambient growth plus cumulative projects has also been provided to represent the change in noise levels associated with the project at the time that it is completed. **Table 16** shows that the project off-site traffic noise level increases range from 0.0 to 0.1 dBA CNEL. Based on the significance criteria for off-site traffic noise presented in Table 13, land uses adjacent to the study area roadway segments would experience less than significant noise level increases on receiving land uses due to the project-related traffic.

TABLE 16
Cumulative Projects Traffic Noise level Increases

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[2]			Incremental Noise Level Increase Threshold[3]	
				No Project	With Project	Project Addition	Limit	Exceeded?
1	Redlands Av.	s/o Ramona Exwy.	Sensitive	64.4	64.4	0.0	3.0	No
2	Evans Rd.	n/o Street A	Sensitive	72.6	72.7	0.1	1.5	No
3	Evans Rd.	s/o Ramona Exwy.	Sensitive	73.3	73.3	0.0	1.5	No
4	Ramona Exwy.	w/o Redlands Av.	Sensitive	75.2	75.2	0.0	1.5	No
5	Ramona Exwy.	w/o Evans Rd.	Sensitive	75.5	75.5	0.0	1.5	No
6	Ramona Exwy.	e/o Evans Rd.	Sensitive	74.9	74.9	0.0	1.5	No

[1] Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.
[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.
[3] Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4-1)?

12b. **Less Than Significant Impact.** Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Based on the representative vibration levels presented for various construction equipment types in the noise study, it is possible to estimate the potential for building damage using the following vibration assessment

methods defined by the FTA. To describe the vibration impacts the FTA provides the following equation: PPVequip = PPVref x (25/D).

At distances ranging from 18 to 951 feet from project construction activities, construction vibration velocity levels are estimated to range from 0.000 to 0.146 in/sec PPV. Based on maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec) for older residential buildings, the typical project construction vibration levels will satisfy the building damage thresholds at all receiver locations around the project site. In addition, the typical construction vibration levels at the nearest sensitive receiver locations are unlikely to be sustained during the entire construction period but will occur rather only during the times that heavy construction equipment is operating adjacent to the project site boundaries.

12c. **Less Than Significant Impact.** The proposed project site lies within Zone D of March Air Reserve Base/Inland Port Airport (MARB/IPA) according to the MARB/IPA Airport Land Use Compatibility Plan. Residential uses are allowed in Zone D with restrictions on major spectator-oriented sports stadium, amphitheaters, and concert halls, uses that involve electromagnetic radiation, and requires deed notice and disclosure to property owners. The proposed project will be reviewed by the Airports Land Use Commission (ALUC) during the entitlement process and conditions will be applied to protect aircraft over-flights. These provisions serve to promote aircraft safety and protect residents living in proximity to the airport**.** The project site lies outside of the noise contours of the March ARB AICUZ. The site is not significantly impacted by aircraft or vehicle noise. Construction standards will require noise attenuation through a project perimeter wall and compliance with Title 24 energy standards. Therefore, the overall impact is less than significant. The proposed project is not located in the vicinity of a private airstrip and would not expose people to excessive noise levels. The nearest private airport is the Perris Valley Airport, located approximately six miles south of the project site.

Mitigation Measures:

NOI-1: ` Any equipment activity and equipment maintenance is limited to the hours between 7:00 a.m. and 7:00 p.m. Per Zoning Ordinance, Noise Control, Section 7.34.060, it is unlawful for any persons 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, or on Sundays to erect, construct, demolish, excavate, alter or repair any building or structure in a manner as to create disturbing excessive or offensive noise. Construction activity shall not exceed 80 dBA in residential zones in the City.

NOI-2: Stationary equipment that generates noise in excess of 65 dBA at the project boundaries must be shielded and located at least 100 feet from occupied residences. The equipment area with appropriate acoustic shielding shall be designated on building and grading plans. Equipment and shielding shall remain in the designated location throughout construction activities.

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

Explanation of Checklist Answers

13a. **Less Than Significant Impact.** The City's population (2010) is estimated at 73,756 persons (U.S. Census Bureau 2016). The Southern California Association of Governments (SCAG) projections estimate the population of the City will grow to 82,000 persons by the year 2020 (SCAG 2012b). The proposed project defines a maximum density based on an acceptable level of service for traffic conditions at build-out. The proposed 192 lots at 6,000 SF are compatible with the densities in other residential subdivisions in the vicinity. Based on the Housing Element of the Perris General Plan that identifies a population of 4.16 persons per household, the project will generate a population of 799 residents. This growth represents incremental residential growth that will not induce substantial growth in the area either by the new population it creates or the infrastructure improvements it provides.

13b. **No Impact.** The proposed project site is currently undeveloped and will not displace people or residences. Therefore, it does not generate an impact based on displacements of people or housing.

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

Sources: http://www.cityofperris.org/city-hall/index-cityhall.html.
https://www.valverde.edu/schools.
http://www.rvcfire.org/stationsAndFunctions/FireStations/Pages/default.aspx.
http://www.cityofperris.org/city-hall/forms/developer-impact-fees.pdf.
Val Verde USD correspondence date October 25, 2021

Explanation of Checklist Answers

14a. **Less Than Significant Impact.** Fire protection services in the City of Perris are provided by the California Department of Forestry and Fire Protection (CalFire), under contract with and operating as the Riverside County Fire Department (RCFD) for fire and emergency services. The City has firefighters assigned to two fire stations: Fire Station 90 and Fire Station 1. Fire Station 90, located at 333 Placentia Avenue, is approximately two miles south of the project site and staffed by one battalion. It is anticipated to be the fire station with first response to the proposed project. Fire Station 1, located at 210 West San Jacinto Avenue, is approximately five miles south of the project site and is also staffed by one battalion.

The proposed project is designed in compliance with all applicable ordinances and standard conditions established by the RCFD and/or the City or State including, but not limited to, those regarding fire prevention and suppression measures, water improvement plans, fire hydrants, fire access, combustible construction, water availability, and fire sprinkler systems. Compliance with applicable regulations would be confirmed by the RCFD during its review of development plans to ensure they are able to provide proper fire protection to the development.

The City of Perris Ordinance No. 1182 establishes a developer impact fee (DIF) to mitigate the cost of public facilities needed to offset the impact of developing new facilities to support fire services. The project would be required to comply with Ordinance No. 1182 and pay the applicable fire fee to offset any potential impact to the Fire Department. Therefore, payment of the applicable fire fee as required by

Ordinance No. 1182 would reduce potential impacts to the Perris Fire Department to less than significant levels. In addition, all water facilities that serve the project would be required by the city to be sized to provide adequate fire protection per the requirements of the City of Perris Building and Safety Department.

The proposed project would not, in itself, require the construction of new or expanded fire protection facilities. Therefore, no significant impacts related to the construction of fire protection facilities would result with implementation of the project, and no mitigation is required.

14b. **Less Than Significant Impact.** The Riverside County Sheriff Department (RCSD) provides municipal police services for the City of Perris. The Perris Station is commanded by a Captain. This Station is located at 137 North Perris Boulevard, approximately 4.5 miles south of the project site. The Department operates on a patrol incident-response basis.

The project developer will also pay the DIF in accordance with Ordinance No. 1182, which provide a funding source to construct the police, fire, community amenities, government facilities, and roadway infrastructure necessary to mitigate the impacts of the growth expected in the City of Perris over the next 25 years (Perris 2008). Therefore, no significant impacts to the environment related to the construction of police protection facilities would result with implementation of the project, and no mitigation is required.

14c. **Less Than Significant Impact.** The proposed project is located within the boundaries of the Val Verde Unified School District (VVUSD). The proposed project would generate approximately 77 students to Lasselle Elementary School, which has a capacity of 954 students. The proposed project would generate approximately 42 students to Vista Verde Middle School, which has a capacity of 1,088 students, and the proposed project would generate approximately 60 students to Rancho Verde High School, which has a capacity of 2,250 students. The project applicant is required to pay developer impact fees at a base rate of $4.08 per square foot. Section 65995(b) of the *California Government Code* allows increases in the base fee every two years. With the payment of these required fees, no significant impacts to school services would result. The proposed project would not require the construction of new or expanded school facilities and no significant environmental impacts would result. No mitigation is required.

14d. **Less Than Significant Impact.** The City's Community Services Department provides community services and recreational and leisure time opportunities and is responsible for the planning, development, and maintenance of the City's parks and recreational facilities. The proposed project would not provide any new parkland but would increase the demand for parks by generating new residential uses with a modest increase in the population within the City.

On July 11, 2017, the Perris City Council adopted Resolution 5141 that imposes development impact fees on new residential development pursuant to the Mitigation Fee Act (Government Code Section 66000, et seq.) and Perris Municipal Code Section 19.68.020 to fund the public improvements necessary. Per Ordinance No. 1182, the DIF includes development fees for parks. The project developer would be required to pay the applicable park fee prior to the issuance of building permits. The park fee would be used by the City to acquire and develop new parkland in Perris that could be

used by project residents. Payment of the City required park fee would reduce park impacts to less than significant levels.

14e. **Less Than Significant Impact**. The City of Perris contracts with the Riverside County Public Library System and provides library services at Cesar E. Chavez Library located at 163 East San Jacinto Boulevard, approximately four miles south of the proposed project site (Perris 2009; RCLS 2014). The project is subject to DIFs through Resolution 5141 and Ordinance No. 1182 that would be used to provide new library facilities or expand existing library facilities subsequent to increased demand. Through payment of the applicable developer fees required by Ordinance No. 1182 potential impacts to library services and other government services would be less than significant.

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

Sources:https://moval.maps.arcgis.com/apps/Shortlist/index.html?appid=da913fd72d024db09f9c37423371572b, https://www.cityofperris.org/departments/community-services/parks, http://www.parks.ca.gov/?page_id=651. http://www.cityofperris.org/city-hall/forms/developer-impact-fees.pdf. Perris Trail Master Plan, City of Perris, Feb. 26, 2013

Explanation of Checklist Answers

15a, 15b. **Less Than Significant Impact**. The City of Perris Community Services Department administers parks in the City. The nearest facility is Morgan Park located about one-quarter mile south of the project site within May Ranch. The 15-acre park features picnic, playground, tennis, handball, and soccer facilities anchored by a community center**.** The Frank Eaton Memorial Park, is located one-half mile southeast at Ramona Expressway and Bradley Rd. El Potrero Park is located one-half mile north in the City of Moreno Valley and features a multi-Use athletic field, picnic tables, restrooms, and a soccer field**.** The Lake Perris State Park offers boating, fishing, picnicking, and other amenities. The 197 homes proposed within the development will generate a population that will use local recreational facilities, but is not sufficient to include recreational facilities within the development. However, a pedestrian access is provided between Lots 46 and 47 to provide internal project access to an adjoining community trail along the east boundary.

The City of Perris Master Trails Plan shows a Class II bike lane along Evans Rd. The bike lane will be constructed and dedicated to the City for public use as part of the project. There is also a Class II bike lane along the Ramona Expressway.

The project developer will pay the DIFs in accordance with Ordinance No. 1182, which provide a funding source to construct the police, fire, community amenities, government facilities, and roadway infrastructure necessary to mitigate the impacts of the growth expected in the City of Perris over the next 25 years (Perris 2008). Therefore, no significant impacts to the environment related to the construction of recreation facilities would result with implementation of the project, and no mitigation is required.

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

Source: Urban Crossroads, Stratford Ranch East (TTM 38071), (PLN21-05032 / GPA21-05040 / ZC 21-05039), Traffic Analysis, Rev June 2, 2021. RK Engineering Group TIA and VMT Approval, June 8, 2021.

Explanation of Checklist Answers

16a. **Less than Significant Impact.** The project's consistency with Perris General Plan goals and policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities is analyzed in the Land Use section of this Initial Study (refer to Table 12). As identified and further discussed herein, the project would not conflict with the General Plan goals and policies.

All roadway improvements proposed by the project applicant are consistent with the transportation system that is proposed for the area by the Circulation Element and would serve the project. The project applicant would financially support the transportation system through TUMF fees, to pay the projects fair share of the cost to maintain and improve the intersection operations within Perris.

With respect to alternative modes of transportation, the City of Perris General Plan identifies alternate modes of transportation as being bus, rail, or pedestrian. Specifically, Policy I.B.1 states: "require onsite improvements that accommodate public transit vehicles (i.e., bus pullouts, transit stops, cueing lanes, bus turnarounds and other

improvements) at major trip attractions (i.e., community centers, tourist and employment centers)."

The greater project area is served by Riverside Transit Agency (RTA) Route 19 (Moreno Valley to Perris Station Transit Center) and Route 41 (Mead Valley Community Center to Moreno Valley College and Riverside County Regional Medical Center). RTA Route 19 travels along Perris Boulevard in the project area and RTA Route 41 travels east along Ramona Expressway to Perris Boulevard then south along Perris Boulevard in the project area. The proposed project will not conflict with policies that support public transit as Perris Boulevard and Ramona Expressway will still operate as a designated bus route for RTA to provide mass transit. RTA may elect to establish a bus stop along Evans Rd. at the project site based on future rider demand.

Perris General Plan Circulation Element Exhibit CE-14: Perris Future Recreation Trail Systems shows a Regional hiking, Bicycle, Equestrian Trail along Evans Road. This trail shall be incorporated within the Evans Road parkway improvement plans and constructed as part of the frontage road improvements pursuant to mitigation measure TRA-02, which will result in a less than significant impact.

In summary, the project would not conflict with regional or local programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact is less than significant.

16b. **Less than Significant Impact.** SB 743, approved in 2013, changes the way transportation impacts are determined according to CEQA. Updates to the State CEQA Guidelines approved in December 2018 included the addition of CEQA Guidelines Section 15064.3, of which Subdivision b establishes criteria for evaluating a project's transportation impacts based on project type and using automobile vehicle miles traveled (VMT) as the metric. As a component of OPR's revisions to the CEQA Guidelines, lead agencies were required to adopt VMT thresholds of significance by July 1, 2020.

The City of Perris adopted its TIA Guidelines in June 2020. All discretionary land use projects subject to CEQA must evaluate transportation impacts related to VMT as part of the environmental review process. The first step in evaluating a land use project's VMT impact is to perform an initial screening assessment utilizing the City of Perris VMT Scoping Form for Land Use Projects (hereinafter referred to as VMT Scoping Form). The VMT Scoping Form provides an easy-to-use tool for streamlining the VMT analysis process. Screening criteria can be used to determine whether a project would be expected to cause a less than significant impact without having to conduct a detailed study. The screening criteria adopted by the City of Perris are based on the recommendations from OPR and the Western Riverside Council of Governments (WRCOG) for setting screening thresholds for land use projects and include: a project that provides 100 percent affordable housing, a project within one-half mile of qualifying transit, a project that is a local serving land use, a project in a low VMT area, and a project with net daily trips less than 500 average daily trips (ADT). Relevant to the proposed project, projects that locate in areas with low VMT, and that incorporate similar features (i.e., land use type, access to the circulation network, etc.), will tend to exhibit similarly low VMT. If a project is located in a Traffic Analysis Zone (TAZ) with VMT per capita or VMT per employee that is less than or equal to the citywide average, then the

project is considered to be located in a low VMT area and can be presumed to have a less than significant impact on VMT.

As required by the City's TIA Guidelines, an initial screening assessment utilizing the City of Perris VMT Scoping Form was completed for the project and is included in Appendix A of this Initial Study. The project site is within a low VMT area where the home-based VMT per capita of 13.39 is less than the established citywide average VMT per capita of 15.05 based on 2012 base year projections from the Riverside Transportation Analysis Model (RIVTAM). Therefore, the project would have a less than significant impact on VMT. No mitigation is required and no additional VMT modeling is required.

16c. **Less than Significant Impact.** The proposed project will add two intersections along Evans Rd. The roadway paving and design as well as the final design plans for the project site's ingress and egress will be reviewed by the City Engineer for appropriate width and lane geometrics. Thus, the project does not have the potential to substantially increase hazards due to design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Any potential impacts associated with transportation design features will be less than significant.

16d. **Less than Significant Impact.** The design of the proposed project has two points of access at Evans Road that provide a looped circulation system within the development. Two additional points of access are provided to serve a Not-A-Part parcel at the northeast portion of Tentative Tract Map 36647. The southerly access point is designed as a cul-de-sac that can be converted to a through-street when needed. These provisions satisfy City of Perris requirements and the impact is less than significant.

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

Sources: Brian F. Smith & Associates, A PHASE I CULTURAL RESOURCES SURVEY FOR THE STRATFORD RANCH PROJECT, January 22, 2021

Explanation of Checklist Answers:

Tribal Consultation

17ai. **Less Than Significant Impact.** The project site is vacant and there are no buildings on the site. In addition, a records search did not identify any recorded historical resources on the site. Therefore, the project would have not have any significant historical resource impacts.

17aii. **Less Than Significant Impact With Mitigation.** A General Plan Amendment was filed to establish a land use density for the project site from Specific Plan to R-6 6000. The GPA necessitates a Tribal consultation process in accordance with SB 18. In addition, a Tribal consultation is also required under AB 52. The Tribal consultation process was initiated on May 19, 2021. Requests were received from the Pechanga

Band of Luiseño Indians, the Soboba Band of Luiseño Indians, the Agua Caliente Band of Cahuilla Indians, and the Rincon Band of Luiseño Indians seeking consultation by August 19, 2021. A cultural resource study was received by staff and forwarded to each tribe on August 23, 2021.

The City provided a geotechnical report and proposed mitigation measures to the Rincon and Agua Caliente tribes per their requests. A second consultation notice was sent to each tribe on September 9, 2021 and no response was received. Consultation was concluded. No evidence was provided of the presence of any Native American resource on the property. However, implementation of mitigation measures CR-1 and CR-2, would ensure that potential impacts to tribal cultural resources will be reduced to a less than significant level.

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

Sources: http://www.cityofperris.org/city-hall/zoning/19-70_Landscaping.pdf. https://www.emwd.org/use-water-wisely/water-use-efficiency-requirements. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367

Explanation of Checklist Answers:

18a. **Less Than Significant Impact.** The Eastern Municipal Water District (EMWD) would provide sanitary sewer service to the proposed project pursuant to their Will Serve letter dated December 2, 2021. Wastewater generated by the proposed project would be treated at the 300-acre Perris Valley Regional Water Reclamation Facility (PVRWRF) south of Case Road and west of the I-215 Freeway. The PVRWRF has a current capacity of 22 mgd (EMWD 2018). There is potential to expand the capacity to

100 mgd. Waste Discharge Requirements are issued by the Santa Ana RWQCB under the provisions of the *California Water Code* (Division 7 Water Quality, Article 4 Waste Discharge Requirements). These requirements regulate the discharge of wastes that are not made to surface waters but which may impact the region's water quality by affecting underlying groundwater basins. Operational discharge flows treated at the PVRWRF would be required to comply with waste discharge requirements identified for the facility. The proposed project would not discharge wastewater into the domestic sewer system in a way that would cause the PVRWRF to exceed requirements, as determined by the Santa Ana RWQCB's Water Discharge Requirements resulting in a less than significant impact. The EMWD would provide water supply for the project. The proposed project would involve the installation of on-site water and sewer lines to connect to utility infrastructure The EMWD's compliance with conditions, permits, and discharge requirements would further ensure that wastewater treatment requirements would not be exceeded.

Southern California Edison and Southern California Gas Company provide dry utilities to the project site pursuant to tariff and PUC requirements in place. A number of companies provide telecommunication facilities in the region. The proposed project site does not contain any utility facilities that would produce interference or require re-location by the proposed development. The impact is less than significant.

18b. **Less Than Significant Impact.** Domestic water for the proposed project would be provided by the EMWD pursuant to their Will Serve letter dated December 2, 2021. In June 2011, the EMWD adopted its 2010 Urban Water Management Plan (UWMP), which details the reliability of the EMWD's current and future water supply. In addition to local water supply, much of the water the EMWD will use to serve the proposed project is imported through the Metropolitan Water District (MWD), which has analyzed and continues to analyze its ability to provide water from the State Water Project and the Colorado River Aqueduct to its members, including in its Regional Urban Water Management Plan (RUWMP) and its 2010 update to the Integrated Water Resource Plan (IWRP). The agencies' water planning documents detail their ability to provide water in times of shortage and address concerns regarding water supply reliability based on recent judicial decisions affecting the State Water Project and potential impacts on water supply due to climate change. Even in light of these challenges, the MWD's RUWMP determines that the programs and protections it has in place will allow it to provide projected water supplies to its member agencies through 2035, even under a repeat of historic drought scenarios. The City has independently reviewed and analyzed these documents and the other factors that affect the availability and reliability of water supply.

The EMWD has four sources of water supply: (1) imported water purchased from the MWD; (2) local portable groundwater; (3) local desalted groundwater sources; and (4) recycled water from the EMWD's four regional water reclamation facilities. Of these sources, the EMWD relies most on imported water for its supply. The EMWD has full-service, non-interrupted delivery contacts for all the water it receives from the MWD, except for its agricultural water supplies and the water used for recharge in the San Jacinto Basin. EMWD projects that it will have an adequate water supply based on its existing sources to meet the projected demand to 2035 under multiple hydrologic conditions.

While the MWD and the EMWD are confident in the reliability of their water supplies until at least 2035, there are several potential constraints on the availability of imported water supply that affect supply throughout the entire state. These issues (e.g., Bay-

Delta Ecosystem, Colorado River Litigation, and Climate Change) are considered in many of the agencies' plans and the agencies believe they can supply water regardless of these constraints.

Protecting and developing local resources to reduce dependence on imported water is an important objective in the EMWD's Strategic Plan. Groundwater is not being proposed as a source of water for the proposed development. New developments will be supplied with imported water, which is either treated imported water directly from the MWD; untreated imported water from the MWD that is subsequently treated by EMWD; or untreated imported water that is treated by EMWD and recharged into the basin for later use. The EMWD is dedicated to expanding and maximizing the use of recycled water produced at four regional water reclamation facilities, which collect and treat wastewater from throughout the EMWD service area. EMWD policy recognizes recycled water as the preferred source of supply for all non-potable water demands, including irrigation of recreational areas, greenbelts, open space common areas, commercial landscaping, and supply for aesthetics impoundment or other water features.

The EMWD has developed an Integrated Resource Plan (IRP) to serve as a framework for planning and prioritizing supply options. Several supply portfolios were developed and evaluated using performance measures that meet the EMWD's objectives for future water supplies. The EMWD's objectives are to develop a sustainable water supply; to accomplish financial stability; to provide a reliable water supply; to maximize water use efficiency; to maximize use of local resources; and to implement projects that improve the environmental and salinity conditions in the service area. To that end, EMWD has adopted water use efficiency standards. The City of Perris has adopted Landscape Ordinance (Chapter 19.70 to regulate water use efficiency. With these provisions in place, the impact upon water resources will be less than significant.

18c. **Less Than Significant Impact.** As discussed above under Threshold 16a, wastewater generated by the proposed project would be treated at the PVRWRF, which currently has a current capacity of 22 mgd with completion of a recent expansion (EMWD 2018). The EMWD diverts wastewater to the PVRWRF from outside the City of Perris for operational purposes, and with the incremental increase is wastewater from the proposed project, there is sufficient capacity in EMWD's plant. The impact is therefore less than significant.

18d. **Less Than Significant Impact.** Trash, recycling, and green waste service in the City of Perris is provided by CR&R Waste Services. In addition to normal trash collection, the County of Riverside also sponsors several hazardous waste collection events throughout the year. Waste is transported to the Perris Transfer Station and Materials Recovery Facility located at 1706 Goetz Road, approximately six miles south of the project site. At this facility, recyclable materials are separated from solid wastes. Recyclable materials are sold in bulk and transported for processing and transformation for other uses. Solid waste produced from the proposed project would be transported to either (1) the Badlands Landfill on Ironwood Avenue in Moreno Valley, which has a permitted annual capacity of 1,000,000 - 1,499,999 Tons/Year (tpy) or (2) the El Sobrante Landfill on Dawson Canyon Road in Corona, with a permitted annual capacity of 2,000,000 Tons/Year (tpy) (CalRecycle 2020).

The proposed project will generate incremental solid waste from construction and domestic resources. With the material recovery operations in place at the Perris Transfer Station, and recycling programs in place for individual participation, the

proposed project would not substantially contribute to exceeding the permitted capacity of these landfills.

18e. **Less Than Significant Impact.** Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to decrease solid waste generation through mandatory reductions in solid waste quantities (e.g., through recycling and composting of green waste) and the safe and efficient transport of solid waste. The proposed project would be required to coordinate with CR&R Waste Services for waste collection service. Additionally, the proposed project would be required to comply with applicable practices enacted by the City under the California Integrated Waste Management Act of 1989 (AB 939) and any other applicable local, State, and federal solid waste management regulations. The County of Riverside adopted its *Countywide Integrated Waste Management Plan* (CIWMP) in 1998. The CIWMP includes the Countywide Summary Plan; the Countywide Siting Element; and the Source Reduction and Recycling Elements, the Household Hazardous Waste Elements, and Nondisposal Facility Elements for Riverside County and each city in Riverside County. In summary, the proposed project would comply with all regulatory requirements regarding solid waste.

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

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?	☐	☐	☐	☒

Sources: Perris, City of, *Comprehensive General Plan 2030* Circulation Element, Perris, CA: the City. http://www.cityofperris.org/city-hall/general-plan.html

Explanation of Checklist Answers:

19a-d. No Impact. The proposed project site is not located within, nor in proximity to, any of the Fire Hazard Severity Zones (Moderate, High, Very High) within the State Responsibility Area (SRA). Also, as shown in the General Plan Exhibit S-16 Wildfire Constraint Areas, the project site is not located within the City's designated Wildlife Constraint areas. Therefore, the proposed project would not have any impacts on wildfire and no mitigation measures are required.

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

Explanation of Checklist Answers

20a. Less Than Significant Impact. The project site is currently undeveloped. As described in the Biological Resources section of this Initial Study, vegetation types on the project site consists of non-native grassland/ruderal, disturbed/developed and emergent marsh. There are no other sensitive biological resources, although the site

lies within the habitat range of the Stephens Kangaroo rat, burrowing owl and may be a raptor foraging area. With implementation of the recommended mitigation measures, impacts to biological resources would be less than significant. There are no known historical, archaeological, or paleontological resources located within the project site; however, there is a potential to encounter these resources during excavation activities. Protocols are in place to address any subsurface resources.

20b. **Less Than Significant Impact.** As identified through the analysis presented in this Initial Study, the proposed project would have no impact or less than significant impacts relating to all of the analyzed topics. Traffic impacts would be cumulative significant without mitigation.

The project traffic report states that the project would have cumulative traffic impacts to four area intersections. The four intersections include "Perris Blvd. at Ramona Expressway, Redlands Ave. and Ramona Expressway, Evans Rd. and Project Street 'A', and Evans Rd. at Ramona Expressway. Therefore, mitigation measures are recommended in Section 16 to reduce potential project and cumulative traffic impacts to a less than significant level. The project would potentially have impacts to aesthetics, biological resources, cultural resources, noise and traffic, however mitigation measures are recommended to reduce impacts to a less than significant level. The project would not have any significant impacts to other environmental disciplines, including agriculture and forestry resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, tribal cultural resources or utility and service systems. Because the project would not have any significant impacts that cannot be mitigated to a level of less than significant, the project would not have any significant cumulative project.

In addition, the proposed project would potentially have impacts to agriculture and forestry resources, air quality, greenhouse gas emissions, biological resources, and noise. However mitigation measures are recommended to reduce impacts to a less than significant level. The project would not have any significant cumulative impacts to other environmental disciplines, including agriculture and forestry resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, tribal cultural resources or utility and service systems. Because the project would not have any significant impacts that cannot be mitigated to a less than significant level, the project would not have any significant cumulative project impacts.

20c. **Less Than Significant Impact.** As identified through the analysis presented in this Initial Study, the proposed project would have no significant impacts on humans, resulting from the proposed project either directly or indirectly.

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