

**DRAFT**

**Ramona Expressway and Brennan Avenue Warehouse Project  
Initial Study/Mitigated Negative Declaration  
City of Perris, Riverside County, California**

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## ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius (Centigrade)
°F	degrees Fahrenheit
µg/m <sup>3</sup>	micrograms per cubic meter
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
AERMOD	American Meteorological Society/EPA Regulatory Model
AICUZ	Air Installation Compatibility Use Zone
ALUCP	Airport Land Use Compatibility Plan
AQ	air quality
AQMP	Air Quality Management Plan
ARB	California Air Resources Board
ASTM	American Society for Testing and Materials
BAU	business-as-usual
BERD	California Built Environment Resource Directory
BMP	Best Management Practice
BRA	Biological Resources Assessment
CA MUTCD	California Manual on Uniform Traffic Control Devices
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CASQA	California Stormwater Quality Association
CBC	California Building Standards Code
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife (formerly CDFG)
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CGS	California Geological Survey
CHL	California Historic Landmarks
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level

**Acronyms and Abbreviations**

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CNPS	California Native Plant Society
CNPSEI	California Native Plant Society Electronic Inventory
CO	carbon monoxide
CPF	cancer potency factor
CPHI	California Points of Historical Interest
CREC	Controlled Recognized Environmental Condition
CRHR	California Register of Historical Resources
dB	decibel
dBA	A-weighted decibel
DBESP	Determination of Biologically Equivalent or Superior Preservation
DIF	Development Impact Fee
DPM	diesel particulate matter
EAP	Energy Action Plans
EIC	Eastern Information Center
EIR	Environmental Impact Report
EMFAC2021	EMissions FACTor mobile source emissions model
EMWD	Eastern Municipal Water District
EOP	Emergency Operations Plan
EPA	United States Environmental Protection Agency
ERRP	Enhanced Recharge and Recovery Program
ESA	Environmental Site Assessment
EV	electric vehicle
FAA	Federal Aviation Administration
FAR	floor area ratio
FCS	FirstCarbon Solutions
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GAMAQI	Guidance for Assessing and Mitigating Air Quality Impacts
GHG	greenhouse gas
gpd	gallons per day
HC	Healthy Community
HCP	Habitat Conservation Plan
HMC	Hazard Management Consulting, Inc.
HQTA	High Quality Transit Area
HRA	Health Risk Assessment
HREC	Historical Recognized Environmental Condition

HVAC	heating, ventilation, and air conditioning
HVLP	high volume low pressure
IP	Inland Port
IPaC	Information for Planning and Consultation
IS/MND	Initial Study/Mitigated Negative Declaration
ITE	Institute of Transportation Engineers
kBTU	kilo-British Thermal Unit
kWh	kilowatt-hours
l/kg-day	liters per kilogram body weight per day
L <sub>dn</sub>	day/night average sound level
LEED™	Leadership in Energy and Environmental Design
L <sub>eq</sub>	equivalent sound level or equivalent continuous sound level
LI	Light Industrial
L <sub>max</sub>	maximum noise/sound level
LRA	Local Responsibility Area
LST	localized significance threshold
LUST	Leaking underground storage tanks
MARB	March Air Reserve Base
MARB/IPA	March Air Reserve Base/Inland Port Airport
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MIR	Maximally Impacted Sensitive Receptor
MLD	Most Likely Descendant
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
mph	miles per hour
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MSHCP	Multiple Species Habitat Conservation Plan
MT CO <sub>2</sub> e	metric tons of carbon dioxide equivalent
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
ND	Negative Declaration
NO <sub>2</sub>	nitrogen dioxide
NOI	Notice of Intent
NO <sub>x</sub>	nitrogen oxide

**Acronyms and Abbreviations**

NPDES	National Pollution Discharge Elimination System
NPRBBD	North Perris Road and Bridge Benefit District
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
OEHHA	California Office of Environmental Health Hazard Assessment
OHP	California Office of Historic Preservation
OSHA	Occupational Safety and Health Administration
PCE	Passenger Car Equivalent
PM <sub>10</sub>	particulate matter, including dust, 10 micrometers or less in diameter
PM <sub>2.5</sub>	particulate matter, including dust, 2.5 micrometers or less in diameter
PPV	peak particle velocity
PRMMP	Paleontological Resource Impact Mitigation Monitoring Program
PVCCSP	Perris Valley Commerce Center Specific Plan
PVRWRF	Perris Valley Regional Water Reclamation Facility
RCA	Regional Conservation Authority
RCFD	Riverside County Fire Department
REC	Recognized Environmental Condition
REL	Reference Exposure Level
ROG	reactive organic gases
RTA	Riverside Transit Agency
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SIP	State Implementation Plan
SLCP	Short-Lived Climate Pollutant
SoCAB	South Coast Air Basin
SoCalGas	Southern California Gas Company
SoCalGeo	Southern California Geotechnical
SO <sub>x</sub>	sulfur oxide
SP	service population
SRA	Source Receptor Area
State Water Board	California State Water Resources Control Board
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminant
TPA	Transit Priority Area
TRU	Transport Refrigeration Unit
TUMF	Transportation Uniform Mitigation Fee

USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
Valley Air District	San Joaquin Valley Air Pollution Control District
VMT	Vehicle Miles Traveled
VOC	volatile organic compounds
WEAP	Worker Environmental Awareness Program
WQMP	Water Quality Management Plan
WR-MSHCP	Western Riverside Multiple Species Habitat Conservation Plan
WUI	wildland urban interface
ZEV	Zero-Emission Vehicle

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## SECTION 1: INTRODUCTION

### 1.1 - Purpose

The purpose of this Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) is to identify any potential environmental impacts that would result from implementation of the proposed Ramona Expressway and Brennan Avenue Warehouse Project (proposed project) in the City of Perris, California. Pursuant to Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines) Section 15367, the City of Perris has discretionary authority over the proposed project and is the lead agency in the preparation of this Draft IS/MND and any additional environmental documentation required for the proposed project. According to Section 15070(b), a Mitigated Negative Declaration (MND) is appropriate if it is determined that though a proposed project could result in a significant effect, mitigation measures are available to reduce these significant effects to less than significant levels.

The intended use of this document is to analyze the potential adverse environmental impacts associated with the proposed project pursuant to the requirements of the California Environmental Quality Act (CEQA), identify relevant mitigation measures that would reduce potentially significant impacts, and to provide the basis for input from public agencies, organizations, and interested members of the public.

The remainder of this section provides a brief description of the project location and the primary project characteristics. Section 2 includes an environmental checklist that provides an overview of the potential impacts that may result from project implementation, elaborates on the information contained in the environmental checklist, and provides justification for each checklist response, and Section 3 contains the List of Preparers.

### 1.2 - Project Location

The project site is located in the City of Perris, in Riverside County, California (Exhibit 1). The City of Perris is surrounded by the City of Moreno Valley to the north, the City of Menifee to the south, and unincorporated Riverside County to the east and west. The project site is located at the southwest corner of Ramona Expressway and Brennan Avenue (Exhibit 2). The site is located within the *Perris, California* United States Geological Survey (USGS) 7.5-minute Topographic Quadrangle Map.

The approximately 7.5-acre project site corresponds to Assessor's Parcel Numbers (APNs) 303-020-005, -022, -023, -024, and -025. The project site is surrounded by bounded to the east by Brennan Avenue and Lowe's Distribution Center; a storage yard and Clearwater Pipeline, Inc. to the south; and a vacant lot and Webster Avenue to the west. Beyond Ramona Expressway to the north of the project site are commercial uses, a vacant lot, and residential uses. Approximately 500 feet to the north, beyond the vacant lot, is the closest single-family home to the project site. Approximately 150 feet east of the project site beyond Brennan Avenue is a Lowe's warehouse distribution center, and directly south is a vacant lot and storage yard. The project site is located approximately 40 miles northwest of the Palomar Observatory.

## 1.3 - Environmental Setting

The project site is currently used for storage of a variety of materials and currently contains five vacant permanent buildings: a wood-framed commercial building and a residential building are present on the southeast portion of the project site. In addition, the two connected metal structures are present on the central portion of the project site, and a shed-type structure is present at the southwest portion of the project site.<sup>1</sup> All five of these buildings would be demolished as part of the proposed project. Infrastructure associated with the storage of materials, including concrete foundation pads, equipment shelving, and shipping containers are present throughout the southern portion of the site. The northern portion of the site includes a former storage area for pallets that has been cleared and now supports ruderal vegetation. Mondell pine trees and shrubs are located along the perimeter of the project site.

### 1.3.1 - Land Use and Zoning

The project site is located within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area of the City of Perris. The PVCCSP was approved pursuant to a certified Environmental Impact Report (PVCCSP EIR) on January 10, 2012. The project site is designated as Light Industrial (Exhibit 3). According to the City of Perris Zoning Map, the site is zoned as Light Industrial (Exhibit 4). This zoning provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials, and retail related to manufacturing.<sup>2</sup> The Light Industrial zone has a building intensity of 0.75 floor area ratio (FAR) and a maximum structure height limit of 50 feet.

The project site is also located within the PVCCSP Airport Overlay Zone, which is an area of approximately 1,032 acres and generally extending south of the runway at March Air Reserve Base/Inland Port Airport (MARB/IPA) through the central part of the PVCCSP planning area. This zoning overlay defines specific land uses and land use densities as distinguished by each of these areas. The project site is located in Zone C1 (Primary Approach/Departure Zone), which encompasses most of the projected 60 decibel (dB) Community Noise Equivalent Level (CNEL) contour plus immediately adjoining areas. Exposure to noise in this area is greater (above 60 dB CNEL), however, the accident potential risks at this distance from the runway are reduced by the altitude at which aircraft typically fly over the area.<sup>3</sup>

The surrounding area to the east and south is designated and zoned as Light Industrial. Parcels to the west are zoned and designated as Commercial and Business Professional Office. Parcels to the north are zoned and designated Commercial and Residential.

<sup>1</sup> Hazard Management Consulting, Inc. Phase I Environmental Site Assessment. Ramona Expressway and Brennan Avenue.

<sup>2</sup> City of Perris. 2018. Perris Valley Specific Plan Zoning Map and Land Use. August. Website: <https://www.cityofperris.org/Home/ShowDocument?id=1721>. Accessed February 9, 2022.

<sup>3</sup> City of Perris. 2022. Perris Valley Commerce Center Airport Overlay Zone, Figure 12.0-1, MARB/IPA Airport Compatibility Map. Website: <https://www.cityofperris.org/home/showpublisheddocument/2647/637799977032200000>. Accessed April 12, 2022.

## 1.4 - Project Description

The project applicant, Seefried Industrial Properties, Inc., proposes to construct and operate an approximately 165,371-square-foot non-refrigerated warehouse center for consumer products. The warehouse center would consist of a 160,371-square-foot warehouse, 2,500-square-foot office located on the first floor, a 2,500-square-foot mezzanine, 20 dock doors, an outdoor employee break area/seating patio, and an outdoor gym park (Exhibit 5). The proposed project would be designed to comply with the most recent Title 24 requirements, California's Energy Efficiency Standards for Nonresidential Buildings, which are considered the most state-of-the-art energy efficiency codes in California.

The proposed project is consistent with the zoning established in the PVCCSP and analyzed in the EIR certified for the PVCCSP on January 10, 2012.

### 1.4.1 - Building and Design

The proposed warehouse and distribution center would be composed of tilt-up wall concrete panels with pre-finished metal components on the exterior to contribute to the overall building aesthetics. The building would also incorporate other materials, including wood, plastics, composites, and glass (Exhibit 6a and Exhibit 6b). The overall project design would adhere to the design standards determined by the PVCCSP and approved by the City of Perris.

### 1.4.2 - Site Access

Regional access to the project site is provided via Interstate 215 (I-215) by way of the Ramona Expressway interchange. Local access to the site would be provided via one 40-foot driveway along Brennan Avenue and one 35-foot driveway along Ramona Expressway. Passenger vehicles would access the site from Ramona Expressway. Trucks would access the site via Brennan Avenue to Morgan Street and Morgan Street to Indian Avenue. From there, trucks would either travel northbound on Indian Avenue to Harley Knox Boulevard or south to the new Placentia Interchange, in order to access I-215. A 26-foot-wide fire lane is proposed to the north, west, and south of the warehouse, and would provide emergency and fire truck access.

### 1.4.3 - Fencing

Fencing is proposed throughout the site, including along the perimeter as well as portions of the internal access areas within the site. An 8-foot-tall decorative steel fence with 10-foot-tall pilasters is proposed around the project's frontage along Brennan Avenue and Ramona Expressway, along the first quarter of the proposed project's southern border closest to Brennan Avenue, and along two-thirds of the proposed project's western border closest to Ramona Expressway. The remaining perimeter fencing along the proposed project's southern and western borders would consist of a 14-foot-tall concrete tilt-up screen wall with anti-graffiti coating. An 8-foot-tall sliding gate is proposed internally within the site, just beyond the Brennan Avenue driveway, along with a 14-foot-tall concrete tilt-up screen wall with anti-graffiti coating. A 42-inch-tall concrete guard wall is proposed to the left and right of the loading areas, designed as a safety feature.

#### 1.4.4 - Parking and Loading

The proposed project would include 68 standard automobile parking spaces, 9 electric vehicle (EV) charging spaces, 33 trailer parking spaces, and 29 trailer loading spaces. Parking would be provided along the northern, western, and southern edges of the project site.

#### 1.4.5 - Off-site Improvements

The proposed project would include half-width right-of-way improvements consisting of pavement, curb and gutter, parkway, and sidewalk improvements on the southern side of the centerline in addition to restriping of three through lanes and the construction of an acceleration/deceleration lane along Ramona Expressway (Exhibit 7). A dual 36-inch underground piping structures would replace the open channel along Ramona Expressway and connect to the existing storm drain on the north side of Ramona Expressway. By undergrounding the storm drainage, this would allow the proposed project frontage to be improved to provide for a multipurpose trail, landscaped parkway, and streetlights in accordance with the City of Perris, County of Riverside, and California Department of Transportation (Caltrans) standards. Sewer connections would be provided at the north side of Ramona Expressway. A 12-inch water line would also be extended along Ramona Expressway from the western connection point to the northeast corner of Ramona Expressway and Brennan Avenue.

Along Brennan Avenue, the proposed project would include half-width right-of-way improvements including landscaped parkway and streetlights in accordance with the City of Perris, County of Riverside, and Caltrans standards. A 6-inch dry pipe would be installed along the Brennan frontage for an Eastern Municipal Water District (EMWD) connection.

The multipurpose trail would be constructed of decomposed granite and surrounded by a decorative landscaping palate.

#### 1.4.6 - Lighting

Exterior lighting would meet Perris Municipal Code requirements. Given that the proposed project could operate 24 hours a day, 7 days a week and store consumer goods on-site, lighting would be designed to maximize employee safety and security while complying with Perris Municipal Code standards.

#### 1.4.7 - Signage

Signage in and around the project site would be specific to the tenant and would comply with all applicable Perris Municipal Code requirements.

#### 1.4.8 - Landscaping

The proposed project would include approximately 41,155 square feet of landscaping. The proposed landscaping plan would be consistent with Section 19.02.130 of the City of Perris Code of Ordinances and Section 6.0, Landscape Standards and Guidelines of the PVCCSP. The proposed landscaping plan would preserve Mondell pine trees and shrubs along the perimeter of the project site. The proposed project would provide a landscaped setback planted with Desert Museum palo verde trees and a sidewalk that would extend from the right-of-way line along Ramona Express and Brennan Avenue.

Trees such as Aleppo pine, African fern pine and Australian willow would be planted along the warehouse perimeter. Parking lot screening shrubs include dwarf bottlebrush and blue gem coast rosemary. The entries on Ramona Express and Brennan Avenue would be planted with flowering accent trees including artichoke agave, stalked bubble tree, Mediterranean fan palm, clarity blue dianella, red yucca, blue chalksticks, century plant, desert bird of paradise, dwarf bottlebrush, desert spoon, island bush snapdragon, deer grass, coffeeberry eve case, Huntington carpet rosemary, woolly blue curls, and enhanced boulders along the drive aisle would have enhanced pavement. The single detention system located in the northeast portion of the project site would include erosion control drought tolerant bank planting such as dwarf bottlebrush and grasses. California pepper would be planted near the entrance of the driveway along Brennan Avenue (Exhibit 8).

### 1.4.9 - Employment

The warehouse tenant is unknown at this time. However, the proposed project could utilize approximately 68 full-time employees. Employees at similar facilities typically work in two shifts within a 24-hour period. Because of the number of employees expected, the day/night shifts are split in half with staggered start/end times 30-minutes apart to alleviate the peak traffic demand on the adjacent roadways. Most line haul trucks serving the facility are assumed to arrive and depart between 7:00 p.m. and 1:00 a.m.

### 1.4.10 - Utilities

The proposed project would utilize existing utility connections from the following providers:

- Electricity—Southern California Edison (SCE)
- Natural Gas—Southern California Gas Company (SoCalGas)
- Potable Water—EMWD
- Wastewater—EMWD
- Solid Waste—CR&R Waste Services

Until the main sewer lines are constructed, a temporary septic field would be installed in the southeast portion of the project site.

### Stormwater

The proposed project would include curb and gutter improvements, four catch basins, underground piping, and an underground detention system under the northern portion of the project site. The proposed project would also include a modular wetland treatment device at the northeast corner of the project site. Stormwater runoff from the building roof would be captured via roof drains/downspouts and conveyed underground to connect to the overall drainage system. Runoff from the roof, detention system, and treatment device would be discharged into the existing public storm drain system at the curb face along Brennan Avenue.

Additionally, underground pipe structures would be installed to replace the open channel on the north side of the proposed project frontage and would connect to the existing storm drain along Ramona Expressway.

## Wastewater

The project site would eventually be served by public sanitary sewer line located in the Ramona Expressway area; however, it is anticipated that sewer service would not be available until after the occupancy of the building. Therefore, the proposed project would include a temporary septic field at the southeast corner of the project site as an interim measure. This system would remain in use until the public sewer is available, at which point the system would be decommissioned.

### 1.4.11 - Phasing and Construction

The following construction schedule was assumed for the purposes of this environmental analysis. The proposed project would be constructed in a single phase beginning in the fourth quarter of 2022. Demolition of the existing buildings on project site would occur within the first month of construction, followed by site preparation and grading activities. The proposed project is expected to be operational in the second quarter of 2023.

### 1.4.12 - Operation

The warehouse tenant is unknown at this time. Sortable e-commerce warehouses and distribution centers are high-cube package handling facilities that support the “first-mile” of the tenant’s fulfillment network. The proposed project is intended to be used primarily for the storage and/or consolidation of goods prior to their distribution to the customer or another supporting facility. The proposed building would store, package, and fulfill orders, utilizing automation to enable highly efficient processing of goods. The site could operate 24-hours a day, 365 days per year. Cold storage is not proposed as part of the project.

## 1.5 - Required Discretionary Approvals

As mentioned previously, the City of Perris has discretionary authority over the proposed project and is the CEQA lead agency for the preparation of this Draft IS/MND. In order to implement the project, the City would need to secure the following permits/approvals:

- Approval of the Final IS/MND and Mitigation Monitoring and Reporting Program (MMRP)
- Development Plan review (DPR 21-21-05273) approval
- Grading and Building Permits to grade and construct the proposed project
- Approval of avigation easement by March Air Reserve Base (MARB)
- Project design review by Riverside County Fire Department (RCFD)

## 1.6 - Intended Uses of this Document

State CEQA Guidelines Section 15063 explains that an Initial Study is prepared primarily to provide the lead agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration (ND), or MND would be appropriate for analyzing potential adverse environmental impacts associated with a proposed project.

An MND is appropriate if it is determined that mitigation measures are available to reduce all potential significant effects to less than significant levels. When analyzing potential impacts of the

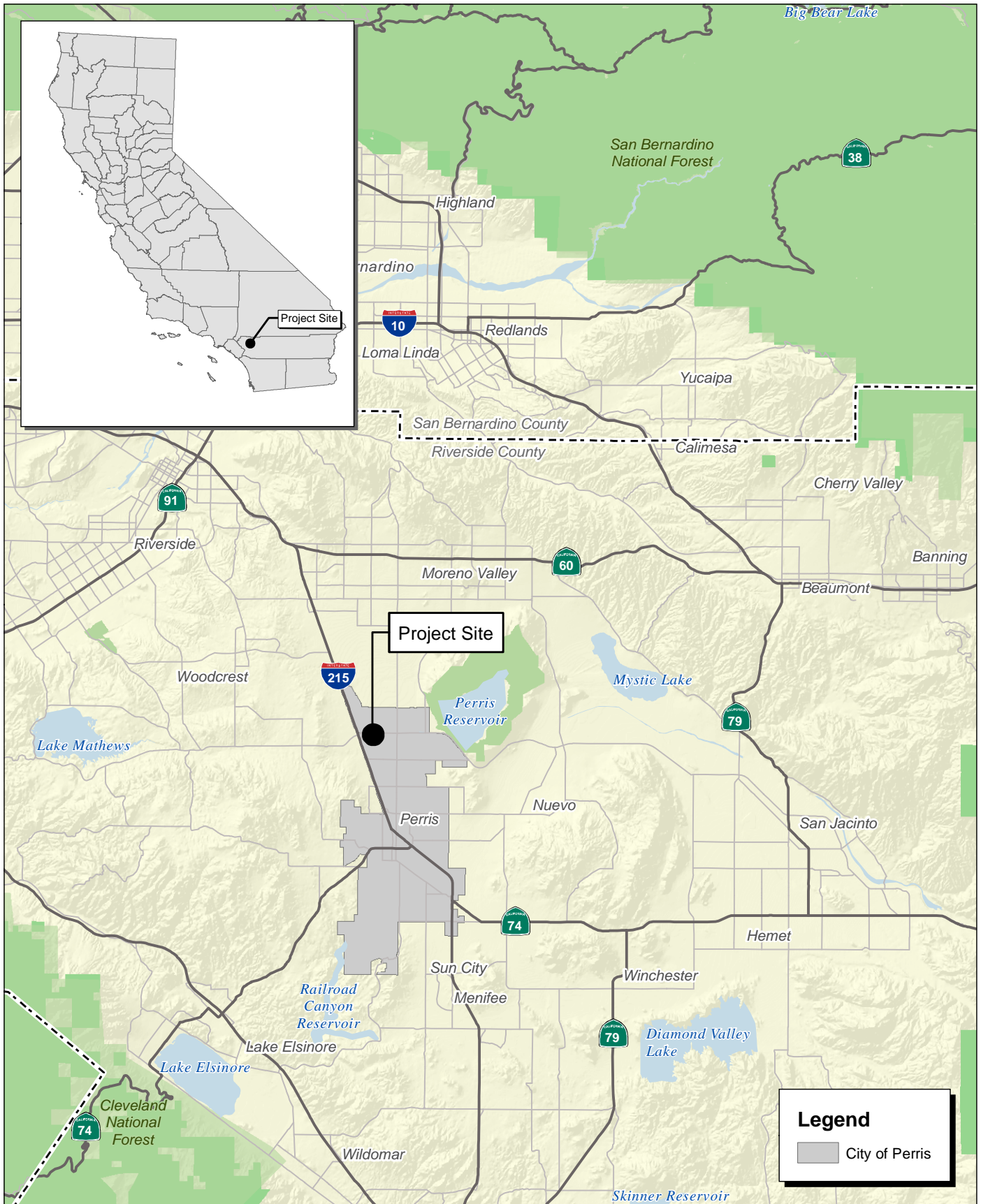
proposed project, this analysis will first identify any relevant and applicable mitigation measures from the certified PVCCSP EIR. If impacts are less than significant with implementation of already adopted PVCCSP mitigation measures, the analysis will conclude with a determination of less than significant. If potential impacts remain, this analysis will then discuss whether project-specific mitigation is required to further reduce impact to below a level of significance. Where project-specific mitigation is identified to reduce impacts, the analysis will conclude that impacts are less than significant with mitigation incorporated. In identifying project-specific mitigation measures, this document will not restate conditions of approval that are commonly established or routinely applied to projects in the City. Standard requirements and regulations that any development must comply with, including those that are outside the City's jurisdiction, are not considered mitigation measures and therefore, will not be identified as such in this document.

Accordingly, this Draft IS/MND is an informational document which is intended to inform decision makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed project. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the proposed project. The Draft IS/MND will be circulated for a minimum of 30 days, during which comments concerning the analysis contained in the Draft IS/MND should be sent to:

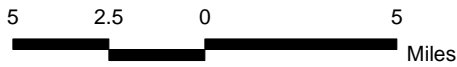
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Source: Census 2000 Data, The California Spatial Information Library (CaSIL).



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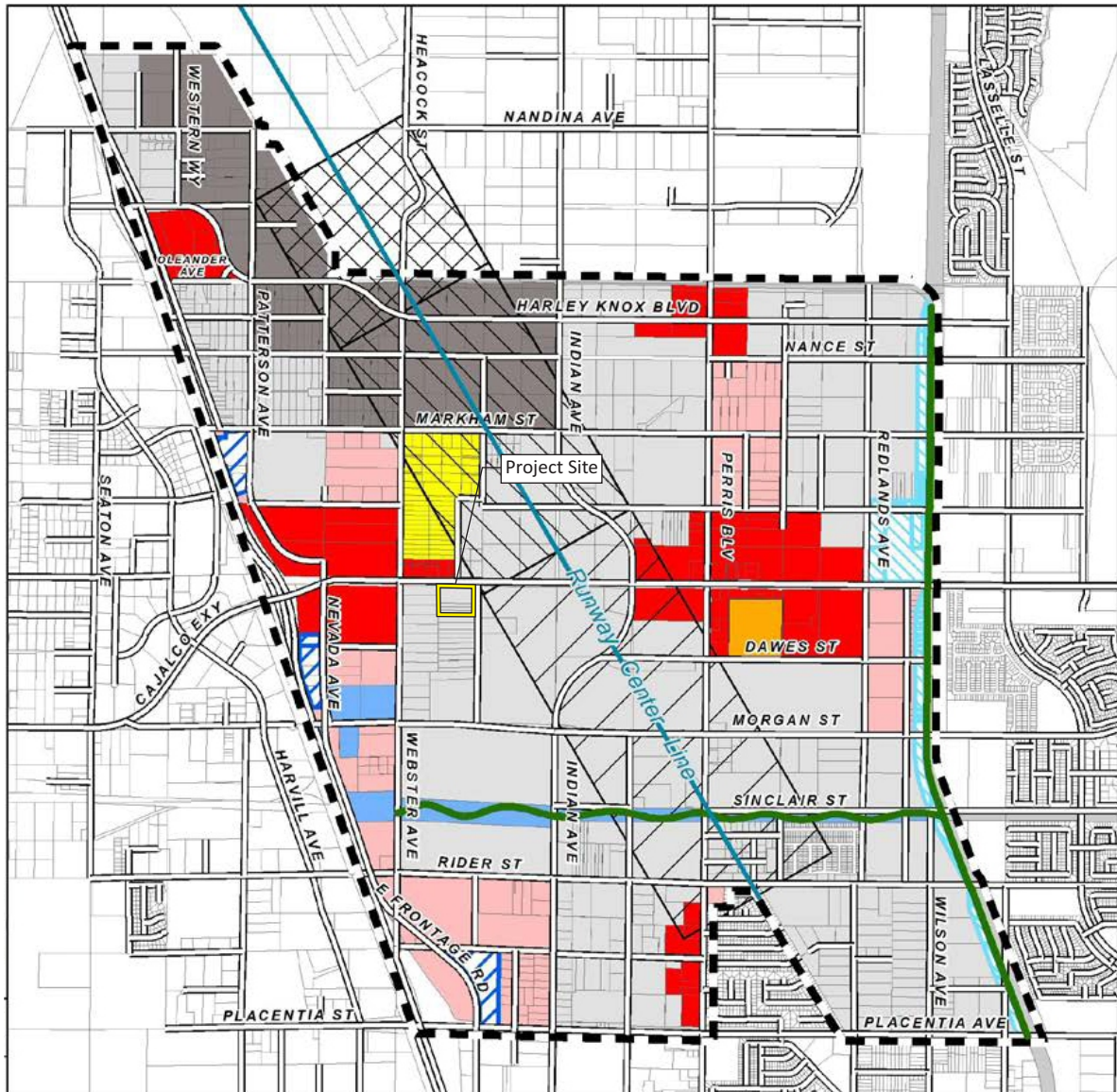


Source: Bing Aerial Imagery.



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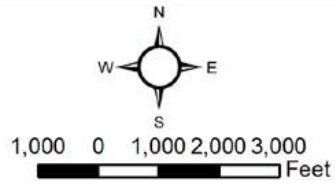




**LEGEND**

SPECIFIC PLAN BOUNDARY	<b>PROPOSED LAND USE</b>	BUSINESS PROFESSIONAL OFFICE
POTENTIAL BASIN AREAS	RESIDENTIAL	LIGHT INDUSTRIAL
FUTURE PERRIS VALLEY STORM DRAIN	MULTI-FAMILY RESIDENTIAL	GENERAL INDUSTRIAL
CLEAR ZONE	COMMERCIAL	PUBLIC/SEMI-PUBLIC FACILITY
ACCIDENT POTENTIAL ZONE I		TRAIL
ACCIDENT POTENTIAL ZONE II		

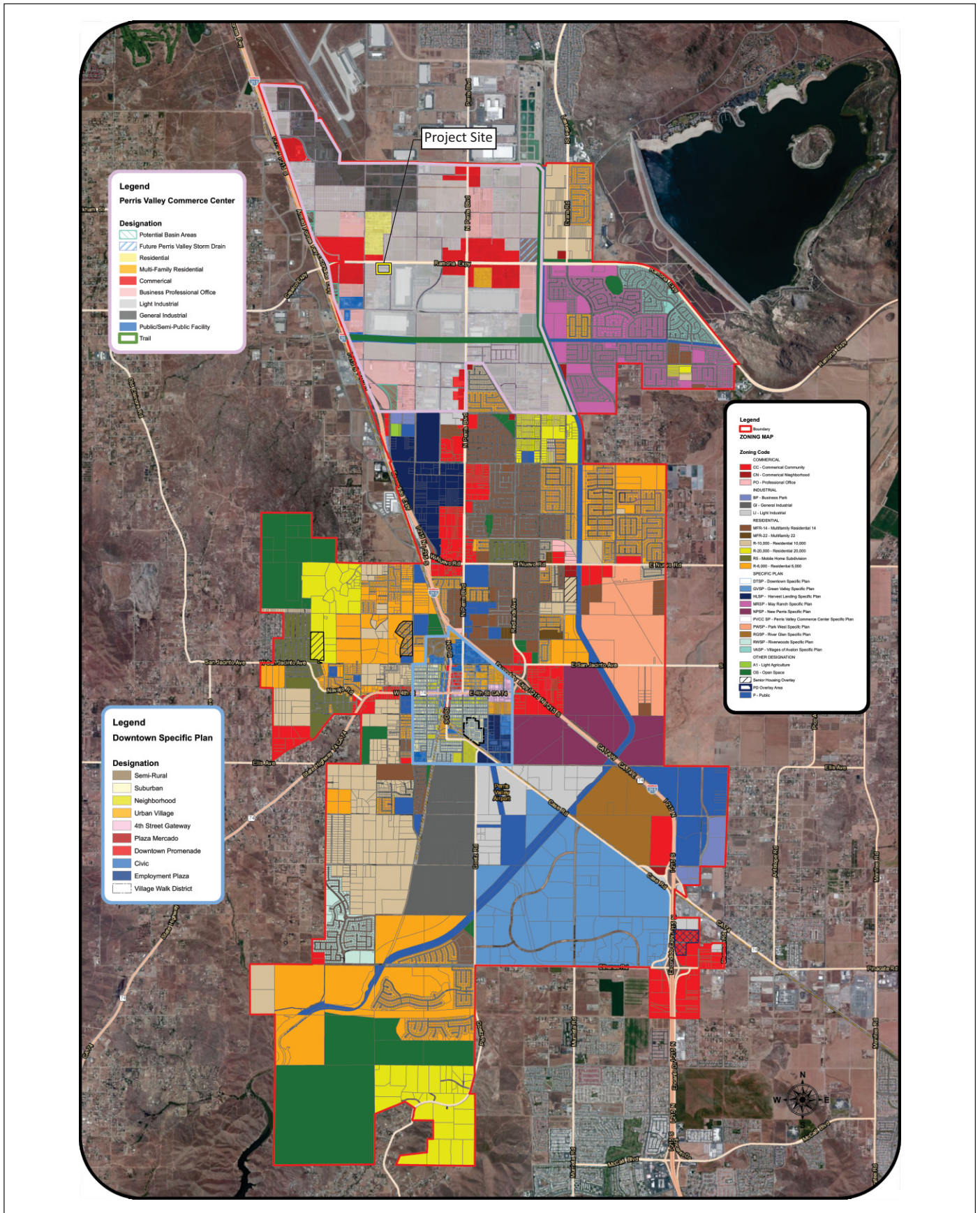
Sources: County of Riverside, 2011



Source: Perris Valley Commerce Center Land Use Plan.

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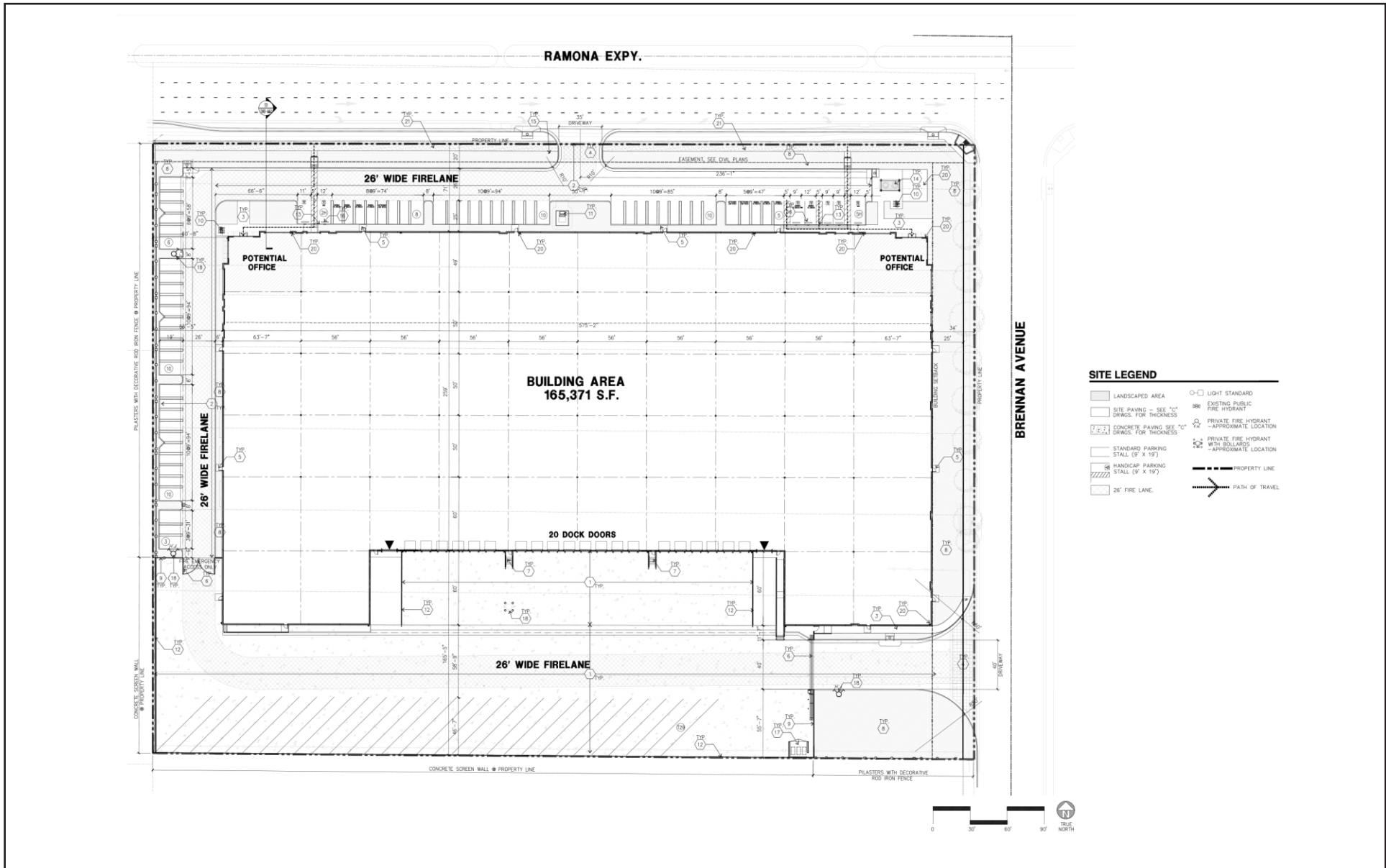




Source: City of Perris Zoning Map, 2016.

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Source: HPA Architecture

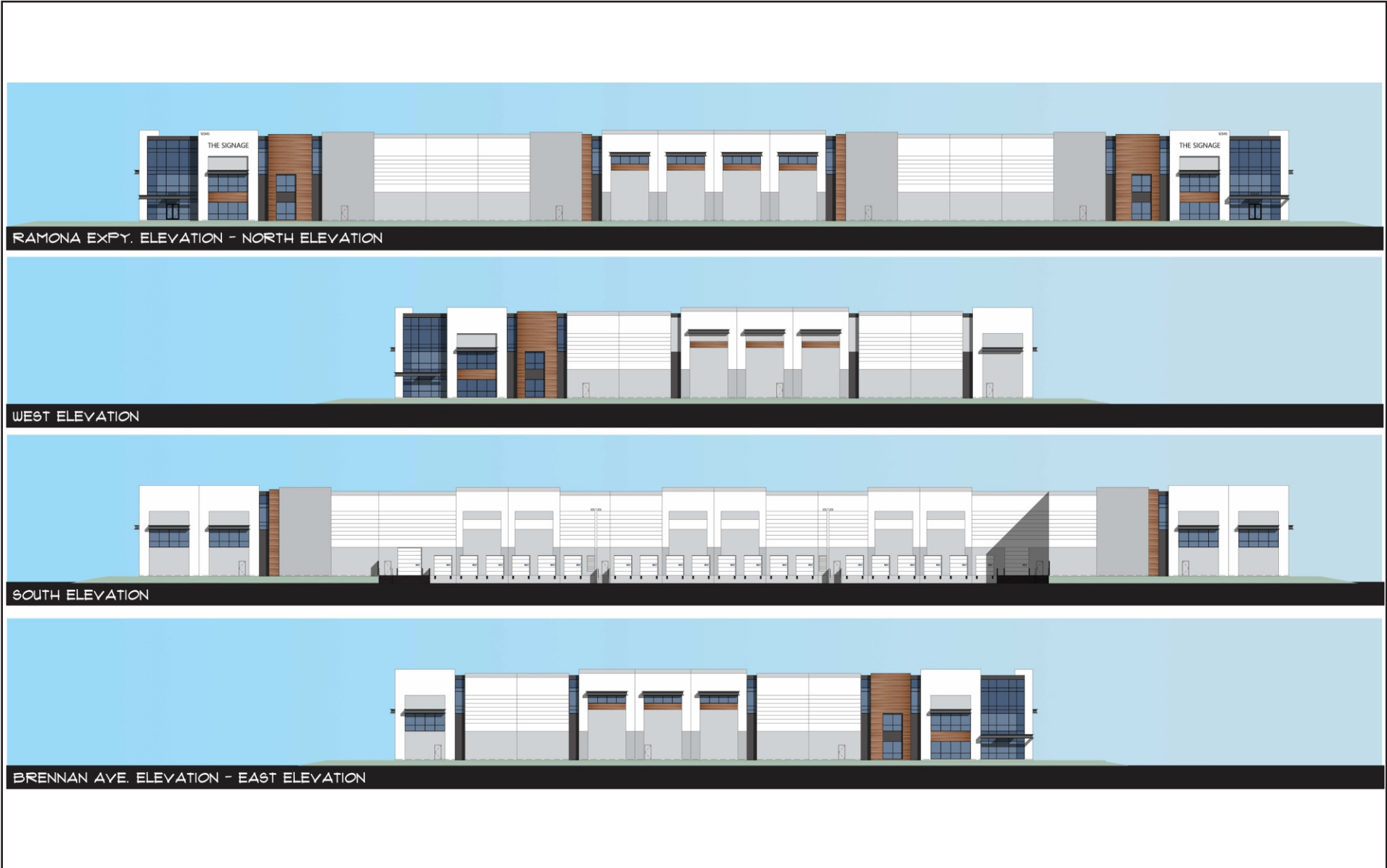
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**Exhibit 5  
Site Plan**

SEEFRIED INDUSTRIAL PROPERTIES, INC.  
RAMONA EXPRESSWAY AND BRENNAN AVENUE WAREHOUSE PROJECT  
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

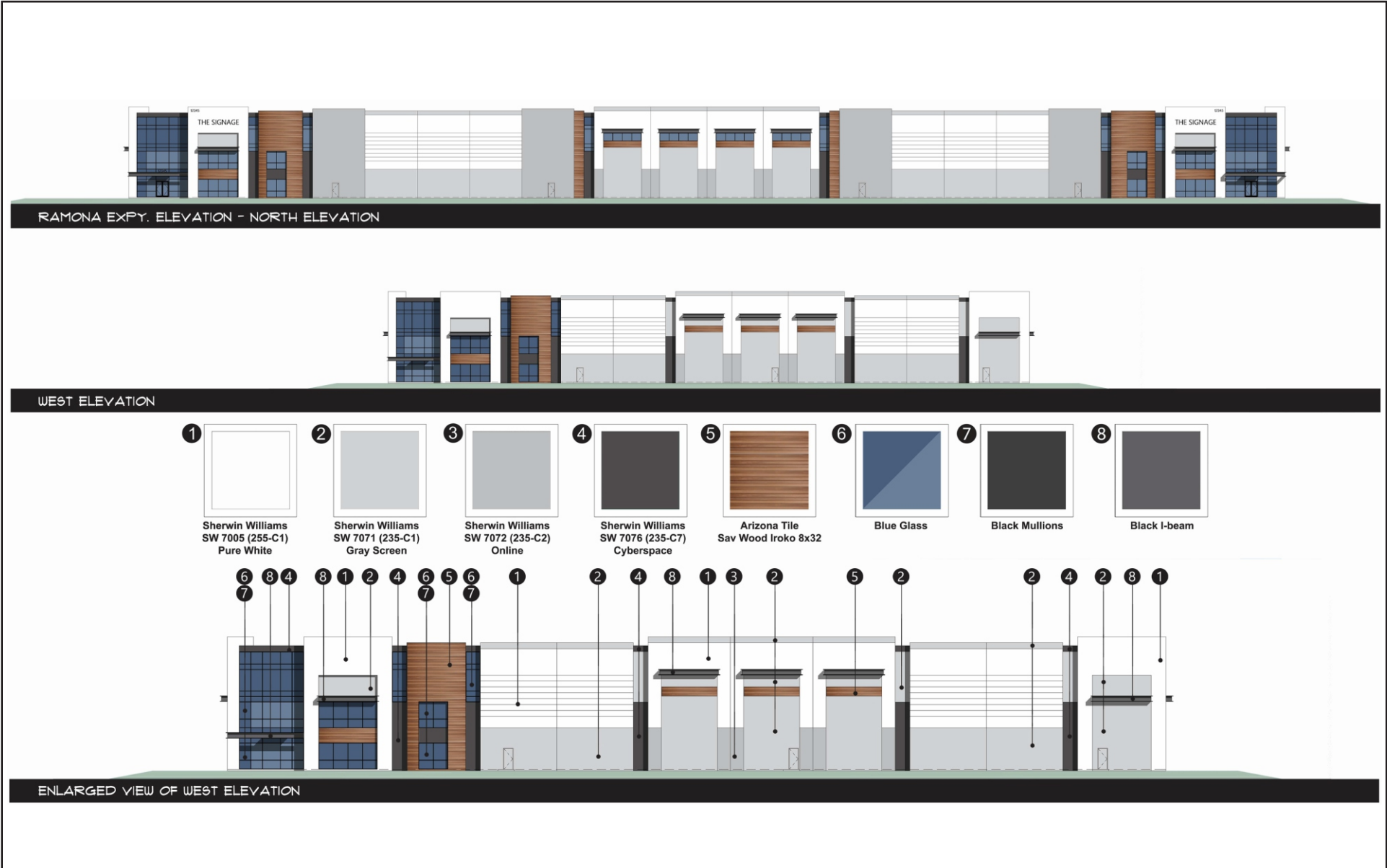
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Source: HPA Architecture, 2022.



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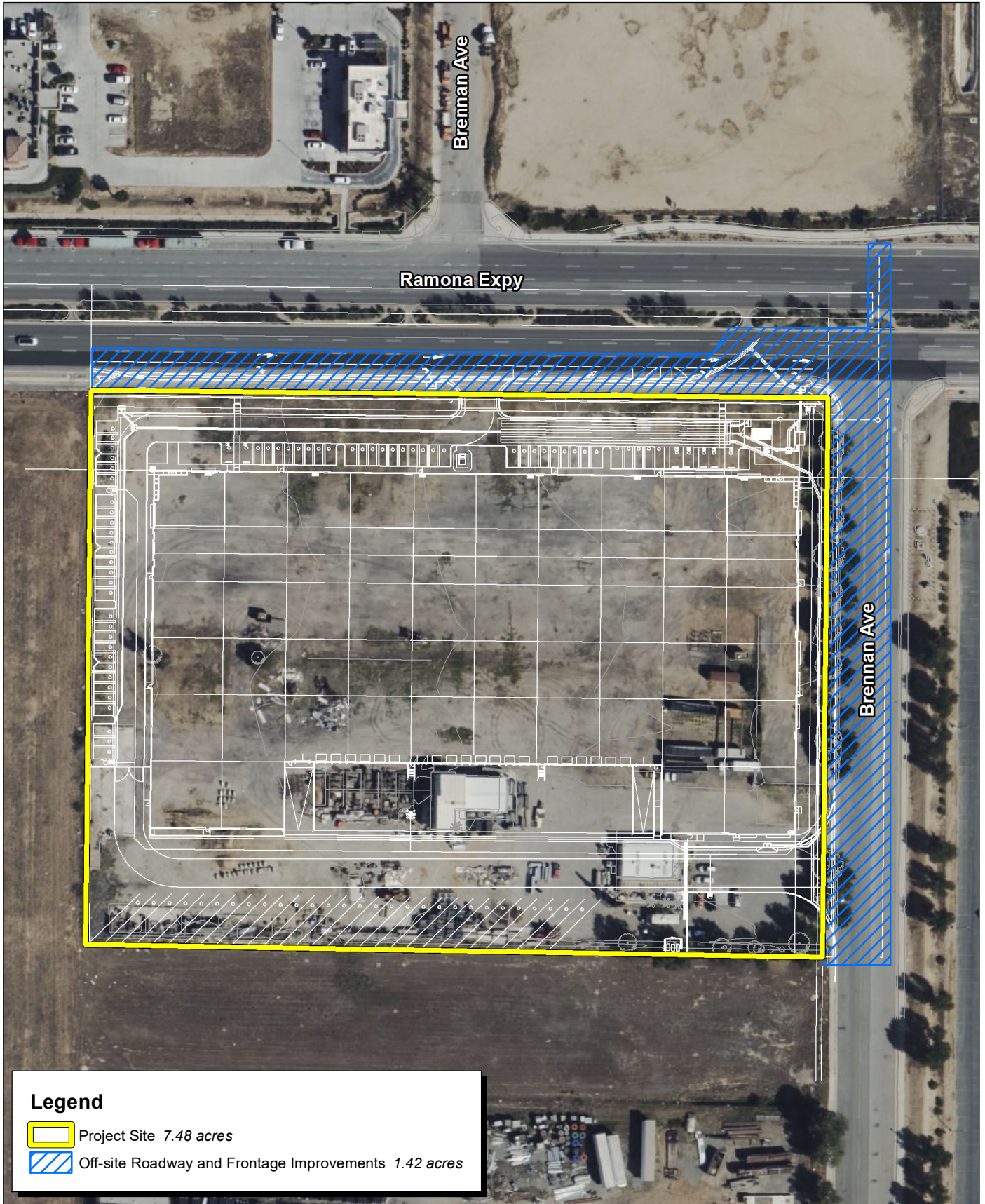


Source: HPA Architecture, 2022.



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Source: Bing Aerial Imagery. DRC Engineering, Inc., 2022.

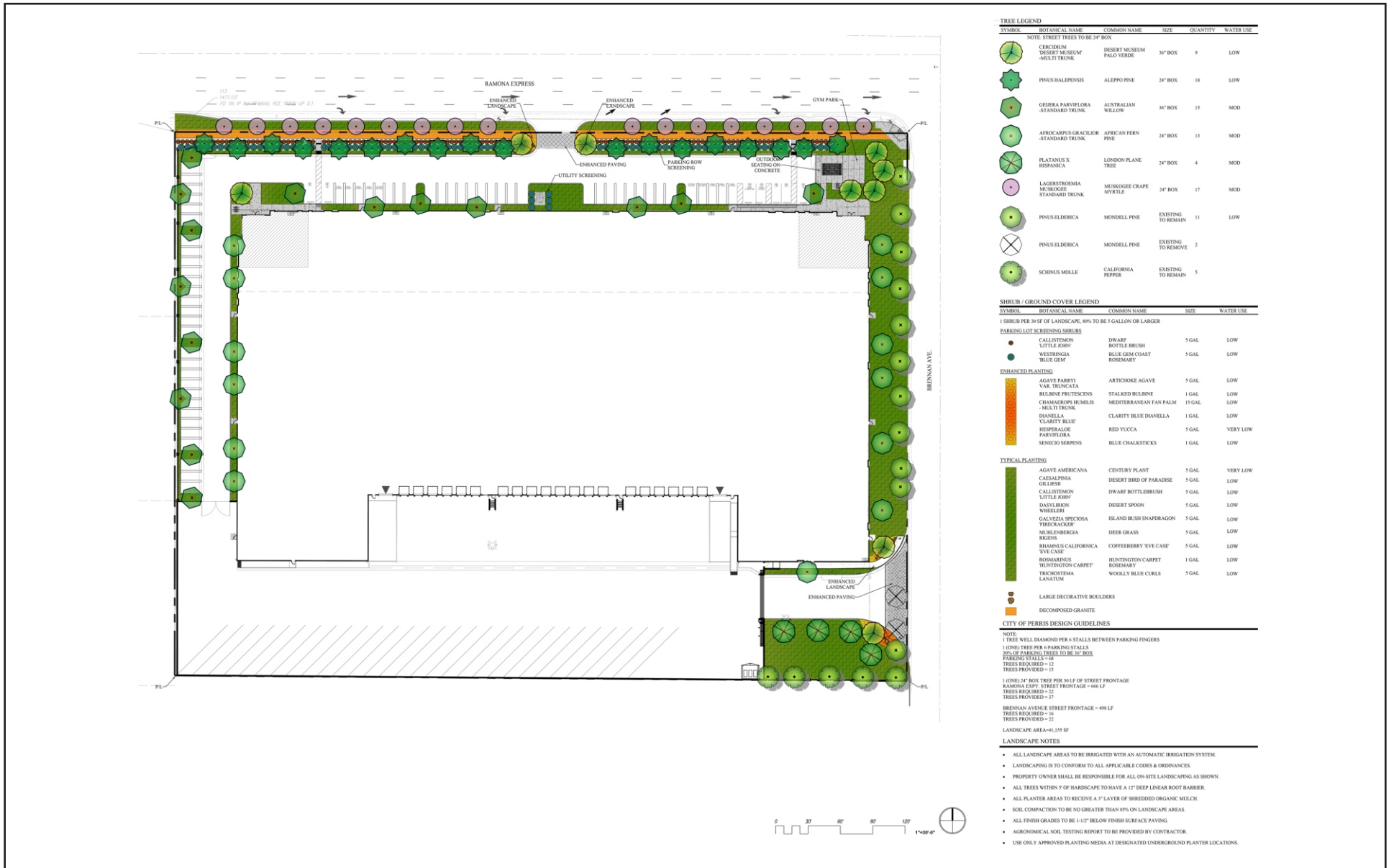
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**Exhibit 7**  
**Project Off-site Roadway  
and Frontage Improvements**

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Source: Emerald Design & HPA, March 10, 2022.

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## SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

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.					
<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture and Forestry Resources	<input type="checkbox"/>	Air Quality
<input type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Energy
<input type="checkbox"/>	Geology/Soils	<input type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Hazards/Hazardous Materials
<input type="checkbox"/>	Hydrology/Water Quality	<input type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Mineral Resources
<input type="checkbox"/>	Noise	<input type="checkbox"/>	Population/Housing	<input type="checkbox"/>	Public Services
<input type="checkbox"/>	Recreation	<input type="checkbox"/>	Transportation	<input type="checkbox"/>	Tribal Cultural Resources
<input type="checkbox"/>	Utilities/Services Systems	<input type="checkbox"/>	Wildfire	<input type="checkbox"/>	Mandatory Findings of Significance
Environmental 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 will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant 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 measure 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.

Date: 10-13-22

Signed: \_\_\_\_\_



Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.1 Aesthetics</b>				
<i>Except as provided in Public Resources Code Section 21099, would the project:</i>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

### Setting

The City of Perris is located in the Perris Valley, between the San Jacinto and the Santa Ana Mountains, which are located north of the City. Rolling hills can be seen in the western and eastern horizon, and the slopes of the mountains provide a contrast to the generally flat topography within the City.<sup>4</sup> According to the City of Perris 2030 General Plan Environmental Impact Report (General Plan EIR), scenic vistas within the City include the western, eastern, and northern views of the surrounding foothills, and the views north to the San Bernardino Mountains.

Caltrans manages the State Scenic Highway Program. Existing law provides Caltrans with full possession and control of all State highways. The intent of the State Scenic Highway Program is to protect any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality by regulating land use and development along scenic highways.<sup>5</sup> The project site is not located within a State Scenic Highway corridor and is not located near any officially designated State Scenic Highways. The project site is located approximately 4.2 miles north of Highway 74, which is an eligible State Scenic Highway.<sup>6</sup>

<sup>4</sup> City of Perris. 2004. City of Perris General Plan 2030 Environmental Impact Report. Accessed April 5, 2022.

<sup>5</sup> California Department of Transportation (Caltrans). 2022. Scenic Highways web page. Website: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed April 5, 2022.

<sup>6</sup> California Department of Transportation (Caltrans). 2019. State Scenic Highway Interactive Map. Website: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed April 5, 2022.

Additionally, the PVCCSP has identified two visual overlay zones, the Freeway Corridor Visual Zone and Major Roadway Corridor Visual Zone. The City’s goal of establishing the visual zones is to provide travelers with the impression of a high caliber, well planned industrial community. The guidelines associated with these visual zones are provided to enhance the “Visual Zone” along I-215 and major roadways inside and adjacent to the Commerce Center. Ramona Expressway, which is adjacent to the northern border of the project site, is located within the Major Roadway Corridor Visual Zone. As such, the proposed project would be required to comply with the requirements of the Major Corridor Visual Zone.<sup>7</sup>

Riverside County Ordinance 655 requires that projects proposed within 45 miles of the Palomar Observatory comply with various policies for outdoor light fixtures, such as lamp source and shielding of light emissions, to reduce nighttime light pollution impacts on the observatory. The project site is located approximately 40 miles northwest of the Palomar Observatory.

Would the project:

**a) Have a substantial adverse effect on a scenic vista?**

**Less than significant impact.** As discussed above, the scenic vistas visible from the City include the western, eastern, and northern views of the surrounding foothills, and the views north of the San Bernardino Mountains. As concluded in the 2030 General Plan EIR (Section 6.0, Issues Found not to be Significant), new development that is consistent with land use and development standards set forth in the General Plan 2030 has the potential to partially obstruct views of the surround visual resources, but would result in less than significant impacts to scenic vistas as the east–west and north–south oriented roadway network and streetscapes in the City frame and preserve scenic vistas from public rights-of-way to the distant horizons and foothills.

The project site is located within the PVCCSP planning area. The PVCCSP Initial Study (Section 1, Aesthetics) concluded that the PVCCSP area is not located within a scenic vista, nor would the development under the PVCCSP, including the change in land uses, have an adverse effect on a scenic vista.<sup>8</sup> Further, the PVCCSP restricts building heights and includes architectural design and landscape guidelines that would meet the City’s development standards, further reducing the potential for visual impacts. Because the PVCCSP area is developed with low-rise industrial buildings in the area surrounding the project site, development of the proposed warehouse building would be consistent with surrounding land uses. The proposed project would be composed of tilt-up wall concrete panels with pre-finished metal components on the exterior to mark the building access and contribute to the overall building aesthetic. The proposed building would have a maximum building height of 36 feet (Exhibit 6a and Exhibit 6b) and would be positioned centrally on the project site. The overall project design would adhere to the design standards articulated within the PVCCSP and approved by the City and would be consistent with the height requirements outlined in the PVCCSP.<sup>9</sup>

<sup>7</sup> City of Perris. 2012. Perris Valley Commerce Center Specific Plan, On-Site Design Standards and Guidelines. Accessed May 10, 2022.

<sup>8</sup> City of Perris. 2021. Perris Valley Commerce Center Specific Plan, Amendment No. 10 and Development Plan Review 19-00012 Initial Study. Website: [https://files.ceqanet.opr.ca.gov/269666-1/attachment/dtrDfSWOfJlxNK82rd-B1sQDTInctwMryRqp\\_GiBxFGZmNKV2djWRDPXmk9wXWfV2C4Hx1Barb7XI7MK0](https://files.ceqanet.opr.ca.gov/269666-1/attachment/dtrDfSWOfJlxNK82rd-B1sQDTInctwMryRqp_GiBxFGZmNKV2djWRDPXmk9wXWfV2C4Hx1Barb7XI7MK0). Accessed May 20, 2022.

<sup>9</sup> City of Perris. 2012. Perris Valley Commerce Center Specific Plan, On-Site Design Standards and Guidelines. Accessed May 10, 2022.

<sup>10</sup> As such, impacts would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

**b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?**

**No impact.** As discussed above, the proposed project is not located within a State Scenic Highway corridor, and it not located in near a designated or eligible State Scenic Highway. Thus, this condition precludes the proposed project from substantially damaging scenic resources within a State Scenic Highway. As such, no impact would occur. No PVCCSP or project-specific mitigation is applicable or required.

**c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

**No impact.** The proposed project is located within the PVCCSP planning area, which is considered an urbanized area. The PVCCSP designates the project site as LI in accordance with the City Zoning Ordinance. According to Amendment No. 12 of the PVCCSP, Section 8.0 Industrial Design Standards and Guidelines, various development criteria would apply to the physical design and construction of the proposed structures on the project site. As discussed above, the overall project design would comply with the regulations and guidelines articulated within the PVCCSP related to industrial architectural design and site planning sections. Because the proposed project would comply with these guidelines, the proposed project would be consistent with the PVCCSP and would not deviate from the intention of the LI zoning district. Furthermore, the area surrounding the project site is currently developed with multiple light industrial warehouse structures similar in nature to the proposed warehouse. Because the proposed project would be consistent with the zoning of the parcel and Section 8.0 of the PVCCSP, no impacts would occur. No PVCCSP or project-specific mitigation is applicable or required.

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

**Less than significant impact with mitigation incorporated.** The project site is currently used for storage of a variety of materials. A wood-framed commercial building and a residential building are present on the southeast portion of the project site. Two connected metal structures are present on the central portion of the project site, and a shed-type structure is present on the southwest portion of the project site. The proposed project would result in the demolition of these five existing structures and the development of a warehouse and distribution center, which could operate 24 hours a day, 7 days a week and would utilize exterior lighting. Thus, the proposed project could create a more intense source of light from exterior building illumination, parking areas, as well as

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<sup>10</sup> The Light Industrial zone has a building intensity of 0.75 FAR and a maximum structure height limit of 50 feet.

glare from reflective building surfaces or the headlights from vehicular traffic. As a result, these new sources of light could affect nighttime views of the sky and the hills and mountains on the horizon.

However, the proposed project is consistent with the surrounding land uses, and the introduction of new sources of light and glare would not represent a significant source of light or glare uncharacteristic of the surrounding vicinity. Exterior lighting during operation of the proposed project would meet Perris Municipal Code<sup>11</sup> requirements. Lighting would be designed to maximize employee safety and security while complying with Perris Municipal Code standards. All lighting features would also be directed away from adjoining properties and the public right-of-way. The proposed project would also preserve the Mondell pine trees on the site and include approximately 41,155 square feet of landscaping, which would assist in further reducing light and glare. Additionally, because the project site is within 40 miles of the Palomar Observatory it would comply with Riverside County Ordinance 655.

The PVCCSP EIR includes two Hazardous Materials mitigation measures that would also apply to Aesthetics and address light and glare. The proposed project would implement PVCCSP EIR Mitigation Measure (MM) Haz 3, which requires outdoor lighting to be hooded or shielded to prevent light spillage, and PVCCSP mitigation measure MM Haz 5, which addresses glare and visual interference. The implementation of PVCCSP EIR mitigation measures MM Haz 3 and MM Haz 5 would minimize operational impacts related to light and glare. Because the proposed project is consistent with applicable zoning regulations, Riverside County Ordinance 655, the City of Perris Development Code, and would implement applicable measures from the PVCCSP, operational impacts would be less than significant, and no project-specific mitigation is necessary.

During project construction, nighttime lighting may be used within the construction staging areas to provide security for construction equipment. Because of the distance between the construction area and the motorists on Ramona Expressway and Brennan Avenue, such security lights may result in glare to motorists. Implementation of project-specific mitigation measure MM AES-1 would ensure that project-specific impacts to nighttime lighting would be less than significant.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

The proposed project is required to comply with the following applicable mitigation measures from the PVCCSP EIR.

**MM Haz 3** Any outdoor lighting installed shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane.

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

<sup>11</sup> City of Perris. 2022. Perris Municipal Code. Chapter 19.02, General Provisions. 19.02.110, Lighting. Website: [https://library.municode.com/ca/perris/codes/code\\_of\\_ordinances?nodeId=COOR\\_TIT19ZO\\_CH19.02GEPR\\_S19.02.110LI](https://library.municode.com/ca/perris/codes/code_of_ordinances?nodeId=COOR_TIT19ZO_CH19.02GEPR_S19.02.110LI). Accessed April 28, 2022.

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

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

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

Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation. All retention and water quality basins shall be designed to dewater within 48 hours of a rainfall event.

### Project-specific Mitigation Measures

The following project-specific measure is required to reduce potential construction-related impacts to less than significant levels.

- MM AES-1** Prior to issuance of grading permits, the property owner/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.



Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<p><b>2.2 Agriculture and Forestry Resources</b>  <i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i></p>				
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 nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

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

## Setting

According to the PVCCSP, the plan area and its surroundings are in transition from land use as an undeveloped agricultural area to a modern-day Commerce Center providing for the needs of an ever-expanding regional market. The PVCCSP planning area is primarily designated for Light Industrial land use, but also contains Commercial, General Industrial, Business/Professional Office and Public land use designations. The PVCCSP also includes areas with a residential designation to recognize existing communities. The PVCCSP is designed to promote compatibility of existing residential land uses and their neighboring industrial, commercial, and office uses. The project site is surrounded by light industrial, commercial, business professional office, and residential uses. The project site is bounded to the east by Brennan Avenue and Lowe's Distribution Center, vacant land and a storage yard to the south, and a vacant lot and Webster Avenue to the west.

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 nonagricultural use?**

**No impact.** According to the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) California Important Farmland Finder, the project site is designated as "Urban and Built-Up Land."<sup>12</sup> Urban and Built-Up Land is defined as land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Therefore, the project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Further, the project site is zoned as LI according to the PVCCSP and the City's Zoning Code. As such, the proposed project would not convert prime or unique farmland, or farmland of local or Statewide importance to nonagricultural uses. Thus, no impacts would occur. No PVCCSP or project-specific mitigation is applicable or required.

- b) **Conflict with existing zoning for agricultural use, or a Williamson Act Contract?**

**No impact.** As previously discussed, the project is a Light Industrial development, which is consistent with the project site's current zoning designation. The project site is not under agricultural production and is not restricted by a Williamson Act Contract. Therefore, no impacts would occur with respect to zoning for agricultural use or Williamson Act contracts. No PVCCSP or project-specific mitigation is applicable or required.

- c) **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

**No impact.** As previously discussed, the project is an LI development, which is consistent with the project site's current zoning designation. No forest land is located within the City. Therefore, no impacts would occur with respect to the proposed project and potential to disturb or cause the

<sup>12</sup> California Department of Conservation. 2018. Farmland Mapping and Monitoring Program, California Important Farmland Finder. Website: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed April 5, 2022.

rezoning of forested lands, timberlands, or timberlands zoned for production. No PVCCSP or project-specific mitigation is applicable or required.

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

**No impact.** As previously discussed, there is no forest land located within the City. Therefore, there would be no impacts related to the loss of forest land. No PVCCSP or project-specific mitigation is applicable or required.

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

**No impact.** The project site is currently used for storage of a variety of materials with five permanent buildings. Thus, the site does not contain any agricultural uses. The project is an LI development, which is consistent with the project site's current zoning. Based on the lack of forested or agricultural land at the project site, the proposed development would not result in the conversion of forested or farmland to nonagricultural uses and no impacts would occur. No PVCCSP or project-specific mitigation is applicable or required.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

No mitigation required.

### Project-specific Mitigation Measures

No mitigation required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.3 Air Quality</b> <i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.</i> <i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

The analysis in this section is based, in part, on the Air Quality, Greenhouse Gas Emissions, and Energy Report prepared by FirstCarbon Solutions (FCS) on June 24, 2022 (revised August 26, 2022). The report was prepared in compliance with PVCCSP EIR mitigation measures MM Air 1, MM Air 10, and MM Air 15, and can be found in Appendix A.

Where available, the significance criteria established by the applicable Air Quality Management District or Air Pollution Control District may be relied upon to make the following determinations.

### Setting

The project site is located within the City of Perris, in Riverside County, which is within the South Coast Air Basin (SoCAB). The SoCAB includes all of Orange County, Los Angeles County (except for the Antelope Valley), the non-desert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County. The San Gabriel, San Bernardino, and San Jacinto Mountains bound the SoCAB on the north and east while the Pacific Ocean lies to the west of the SoCAB. The southern limit of the SoCAB is the San Diego County line. The SoCAB is under the jurisdiction of South Coast Air Quality Management District (SCAQMD).<sup>13</sup>

The air pollutants for which national and State standards have been promulgated and that are most relevant to air quality planning and regulation in the SoCAB include ozone, nitrogen oxide (NO<sub>x</sub>),

<sup>13</sup> South Coast Air Quality Management District (SCAQMD). 2017. Air Quality Management Plan. Website: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed May 24, 2022.

carbon monoxide (CO), particulate matter, including dust, 10 micrometers or less in diameter (PM<sub>10</sub>), and particulate matter, including dust, 2.5 micrometers or less in diameter (PM<sub>2.5</sub>). In addition, toxic air contaminants (TACs) are of concern in the SoCAB. Each of these pollutants is briefly described below. Other pollutants that are regulated but not considered an issue in the project area are sulfur dioxide, vinyl chloride, sulfates, hydrogen sulfide, and lead; the proposed project would not emit substantial quantities of those pollutants, so they are not discussed further in this section.

- Ozone is a gas that is formed when reactive organic gases (ROG), also known as volatile organic compounds (VOC), and NO<sub>x</sub>—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are conducive to its formation. Its effects can include the following: irritate respiratory system; reduce lung function; cause breathing pattern changes; reduce breathing capacity; inflame and damage cells that line the lungs; make lungs more susceptible to infection; aggravate asthma; aggravate other chronic lung diseases; cause permanent lung damage; cause some immunological changes; increase mortality risk; and cause vegetation and property damage.
- CO is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during winter mornings, with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines—unlike ozone—and motor vehicles operating at slow speeds are the primary source of CO in the SoCAB, the highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Potential health effects from CO ranges depending on exposure: slight headaches; nausea; aggravation of angina pectoris (chest pain) and other aspects of coronary heart disease; decreased exercise tolerance in persons with peripheral vascular disease and lung disease; impairment of central nervous system functions; possible increased risk to fetuses; and death.
- PM<sub>10</sub> and PM<sub>2.5</sub> consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. Health effects from short-term exposure (hours per days) can include the following: irritation of the eyes, nose, throat; coughing; phlegm; chest tightness; shortness of breath; aggravation of existing lung disease causing asthma attacks and acute bronchitis; those affected with heart disease can suffer heart attacks and arrhythmias. Health effects from long-term exposure can include the following: reduced lung function; chronic bronchitis; changes in lung morphology; and death.
- TACs refer to a diverse group of air pollutants that can affect human health but have not had ambient air quality standards established for them. Diesel particulate matter (DPM) is a toxic air contaminant that is emitted from construction equipment and diesel-fueled vehicles and trucks. Some short-term (acute) effects of DPM exposure include eye, nose, throat, and lung irritation, coughs, headaches, light-headedness, and nausea. Studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma

attacks, and premature deaths among those suffering from respiratory problems. Human studies on the carcinogenicity of DPM demonstrate an increased risk of lung cancer, although the increased risk cannot be clearly attributed to diesel exhaust exposure.

Construction and operation of the proposed project would be subject to applicable SCAQMD rules and requirements. The SCAQMD CEQA Air Quality Handbook was developed to assist local jurisdictions and lead agencies in complying with the requirements of CEQA regarding potentially adverse impacts to air quality.<sup>14</sup>

### ***Perris General Plan***

The City of Perris Comprehensive General Plan 2030 guides for local government decision on growth, capital investment, and physical development in the City. The General Plan has the following measures adopted to reduce air quality impacts:<sup>15</sup>

#### *Healthy Community (HC) Element*

**Goal HC-6** Healthy Environment–Support efforts of local businesses and regional agencies to improve the health of our region’s environment.

**Policy HE-6.1** Support regional efforts to improve air quality through energy efficient technology, use of alternative fuels, and land use and transportation planning.

**Policy HE-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.

#### *Circulation Element*

**Goal VII** A transportation system that maintains a high level of environmental quality.

<sup>14</sup> South Coast Air Quality Management District (SCAQMD). 1993. CEQA Air Quality Handbook. Available at SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765.

<sup>15</sup> City of Perris. General Plan Healthy Community Element (2015), Circulation Element (2022), Conservation Element (2005), and Environmental Justice Element (2022). Website: <https://www.cityofperris.org/departments/development-services/general-plan>. Accessed June 24, 2022.

**Policy VII.A** Implement the Transportation System in a manner consistent with federal, State, and local environmental quality standards and regulations.

**VII.A.4** Control dust and mitigate other environmental impacts during all stages of roadway construction consistent with air quality regulations and mitigation measures established in environmental documents.

*Conservation Element*

**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.

*Environmental Justice Element*

**Goal 3.1 Policy** As part of the development review process, require conditions that promote Good Neighbor Policies for Industrial Development for industrial buildings larger than 100,000 square feet. The conditions shall be aimed at protecting nearby homes, churches, parks, daycare centers, schools, and nursing homes from air pollution, noise lighting, and traffic associated with large warehouses, making them a "good neighbor."

***Perris Valley Commerce Center Specific Plan***

The intent of the PVCCSP is to provide high quality industrial, commercial, and office land uses to serve the existing and future residents and business of the City of Perris. The project site is zoned for light industrial use. This zone provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials, and retail related to manufacturing. The light industrial zone has a building intensity of 0.75 FAR and a maximum structure height limit of 50 feet. There are not standards or guidelines within the PVCCSP related to air quality. However, each project within the PVCCSP area is required to incorporate applicable mitigation from the PVCCSP EIR. The relevant Air Quality mitigation measures from the PVCCSP EIR are included in the air quality mitigation measures below.<sup>16</sup>

Would the project:

**a) Conflict with or obstruct implementation of the applicable air quality plan?**

**Less than significant impact.** A potentially significant impact to air quality would occur if the proposed project would conflict with or obstruct implementation of the applicable air quality plan. The proposed project is located within the jurisdiction of the SCAQMD. The SCAQMD is responsible for preparing air quality attainment plans to be transmitted to the ARB and the United States Environmental Protection Agency (EPA) for incorporation into the State Implementation Plan (SIP). SCAQMD has designated this area as extreme nonattainment for ozone and serious nonattainment for PM<sub>2.5</sub>.<sup>17</sup> To evaluate whether or not a project conflicts with or obstructs implementation of the

<sup>16</sup> City of Perris. 2011. Perris Valley Commerce Center Specific Plan Final Environmental Impact Report. Website: <https://www.cityofperris.org/departments/development-services/specific-plans>. Accessed June 24, 2022.

<sup>17</sup> South Coast Air Quality Management District (SCAQMD). Air Quality Management Plan. Website: <http://www.aqmd.gov/home/air-quality/clean-air-plans>. Accessed June 24, 2022.

applicable air quality plan (2016 Air Quality Management Plan [AQMP] for SoCAB), the SCAQMD CEQA Air Quality Handbook states that there are two key indicators. These indicators are identified by the criteria discussed below.

- **Indicator:** Whether 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 timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- **Indicator:** According to Chapter 12 of the SCAQMD CEQA Air Quality Handbook, the purpose of the General Plan consistency findings is to determine whether a proposed project is inconsistent with the growth assumptions incorporated into the air quality plan and, thus, whether it would interfere with the region's ability to comply with federal and California air quality standards.

Considering the recommended criteria in the SCAQMD's 1993 Handbook, this analysis uses the following criteria to address this potential impact:

- **Criterion 1:** Proposed project's contribution to air quality violations (SCAQMD's first indicator);
- **Criterion 2:** Assumptions in AQMP (SCAQMD's second indicator); and
- **Criterion 3:** Compliance with applicable emission control measures in the AQMPs.

#### ***Criterion 1: Project's Contribution to Air Quality Violations***

According to the SCAQMD, the project is consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.<sup>18</sup>

If a project's emissions do not exceed the SCAQMD regional thresholds for VOC, NO<sub>x</sub>, CO, sulfur oxide (SO<sub>x</sub>), PM<sub>10</sub>, or PM<sub>2.5</sub>, it follows that the project's emissions would not exceed the allowable limit for each project in order for the region to attain and maintain ambient air quality standards, which is the primary goal of air quality plans. As shown in Impact 2.3(b), the proposed project would not exceed the SCAQMD's regional thresholds of significance during construction nor operation. Furthermore, the mitigation measures shown in Impact 2.3(b) would ensure this impact to be less than significant.

#### ***Criterion 2: Assumptions in AQMP***

The development of emission burdens used in AQMPs to demonstrate compliance with ambient air quality standards is based, in part, on land use patterns contained within local general plans. Therefore, it is reasonable to conclude that if a project is consistent with the applicable general plan land use designation, and the general plan was adopted prior to the applicable AQMP, then the growth of Vehicle Miles Traveled (VMT) and/or population generated by said project would be consistent with growth in VMT and population assumed within the AQMP.

<sup>18</sup> South Coast Air Quality Management District (SCAQMD). 1993. CEQA Handbook. Available at SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765.



The proposed project is subject to the PVCCSP, which intends to provide high quality industrial, commercial, and office land uses to serve the existing and future residents and businesses of the City of Perris.<sup>19</sup> The PVCCSP EIR was adopted in 2011, which is before the adoption of the SCAQMD's 2016 AQMP. The proposed project would include construction and development of an industrial warehouse building. The proposed project site is zoned Light Industrial, which allows for land uses such as light industrial and warehouses. Therefore, it is reasonable to anticipate that the proposed project's VMT, service population, and/or sources of air pollutants would have been analyzed in the 2016 AQMP. With this consideration, the proposed project would not exceed the growth assumptions in the AQMP.

### **Criterion 3: Control Measures**

The AQMP contains several control measures which are enforceable requirements through the adoption of rules and regulations. SCAQMD rules and regulations relevant to the proposed project are described in Section 2.4.2 of the Air Quality, Greenhouse Gas Emissions, and Energy Report prepared for the project included as Appendix A. The proposed project would comply with all applicable SCAQMD rules and regulations. Because of the nature of the proposed project, which includes earthmoving activity, SCAQMD Rule 403 applies. As previously mentioned, Rule 403 governs emissions of fugitive dust during construction and operation activities. The rule requires that fugitive dust be controlled with Best Available Control Measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Compliance with this rule is achieved through application of standard BMPs. These BMPs include application of water or chemical stabilizers to disturbed soils; covering haul vehicles; restricting vehicle speeds on unpaved roads to 15 miles per hour (mph); sweeping loose dirt from paved site access roadways; cessation of construction activity when winds exceed 25 mph; and establishing a permanent ground cover on finished sites. The proposed project's compliance with all applicable SCAQMD rules and regulations would result in consistency with the applicable AQMP control measures. Additionally, the proposed project would be required to comply with all minimum requirements to reduce man-made fugitive dust as described in Section 19.44.070. of the City's Municipal Code.

### **Summary**

In summary, the proposed project would not exceed the growth assumptions in the AQMP. The proposed project would not result in a regional exceedance of criteria air pollutants. Furthermore, the proposed project would comply with all applicable SCAQMD rules and regulations. Therefore, this impact would be less than significant.

#### **b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?**

**Less than significant impact.** This impact is related to the cumulative effect of a project's regional criteria pollutant emissions. As described above, the region is currently nonattainment for ozone,

<sup>19</sup> City of Perris. 2011. Perris Valley Commerce Center Specific Plan Final Environmental Impact Report. Website: <https://www.cityofperris.org/departments/development-services/specific-plans>. Accessed June 24, 2022.

PM<sub>10</sub>, and PM<sub>2.5</sub>. By its nature, air pollution is largely a cumulative impact resulting from emissions generated over a large geographic region. The nonattainment status of regional pollutants is a result of past and present development within the air basin, and this regional impact is a cumulative impact. In other words, new development projects (such as the proposed project) within the air basin would contribute to this impact only on a cumulative basis. No single project would be sufficient in size, by itself, to result in nonattainment of regional air quality standards. Instead, a project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects. All new development that would result in an increase in air pollutant emissions above those assumed in regional air quality plans would contribute to cumulative air quality impacts.

The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. According to Section 15064(h)(4) of the State CEQA Guidelines, the existence of significant cumulative impacts caused by other projects alone does not constitute substantial evidence that the project's incremental effects would be cumulatively considerable.

Rather, the determination of cumulative air quality impacts for construction and operational emissions is based on whether the project would result in regional emissions that exceed the SCAQMD regional thresholds of significance for construction and operations on a project level. Projects that generate emissions below the SCAQMD significance thresholds would be considered consistent with regional air quality planning efforts would not generate cumulatively considerable emissions.

The proposed project's regional construction and operational emissions, which include both on- and off-site emissions, are evaluated separately below. Construction and operational emissions from the proposed project were estimated using the California Emissions Estimator Model (CalEEMod) Version 2022.1. A detailed description of the assumptions used to estimate emissions and the complete CalEEMod output files are included in Appendix A of the Air Quality, Greenhouse Gas Emissions, and Energy Report.

### **Cumulative Construction Emissions**

Construction emissions are described as "short-term" or temporary in duration; however, they have the potential to represent a significant impact with respect to air quality. Construction of the proposed project would result in the temporary generation of VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from construction activities such as site preparation, grading, building construction, architectural coating, and asphalt paving. Fugitive dust emissions are primarily associated with earth disturbance and grading activities and vary as a function of soil silt content, soil moisture, wind speed, acreage of disturbance area, and miles traveled by construction vehicles on-site and off-site. Construction-related NO<sub>x</sub> emissions are primarily generated by exhaust emissions from heavy-duty construction equipment, material and haul trucks, and construction worker vehicles. VOC emissions are mainly generated by exhaust emissions from construction vehicles, off-gas emissions associated with architectural coatings, and asphalt paving.

The proposed project is expected to be operational in the second quarter of 2023. The project construction is assumed to be completed in one phase, beginning in September 2022 and concluding

in June 2023. The anticipated construction schedule reflects the construction start date and the construction phase durations estimated by the project applicant. The construction schedule used in the analysis represents a reasonable worst-case analysis scenario since a delay in construction dates into the future would result in using emission factors for construction equipment that decrease as the analysis year increases, due to improvements in technology and the need to meet more stringent regulatory requirements. Therefore, construction emissions would decrease if the construction schedule moved to later years. The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required by State CEQA Guidelines. For a more detailed description of the construction emissions modeling parameters and assumptions, please refer to the Air Quality, Greenhouse Gas Emissions, and Energy Report prepared for the proposed project (Appendix A).

Table 1 presents the proposed project’s maximum daily construction emissions during the entire construction duration using the worst-case summer or winter daily construction-related criteria pollutant emissions for each phase of construction. Complete CalEEMod output files are included as part of Appendix A of the Air Quality, Greenhouse Gas Emissions, and Energy Report.

**Table 1: Unmitigated Construction–Maximum Daily Emissions by Construction Year**

Construction Year	Regional Pollutant Emissions (pounds per day)					
	VOCs	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summer</b>						
Project Site Construction 2022	4.46	52.3	40.3	0.09	11.5	6.35
Frontage Improvements 2022	1.71	16.8	14.8	0.02	3.35	1.94
<i>Year 2022 Subtotal</i>	<i>6.17</i>	<i>69.1</i>	<i>55.1</i>	<i>0.11</i>	<i>14.85</i>	<i>8.29</i>
Project Site Construction 2023	20.5	26	37.7	0.05	2.7	1.46
Frontage Improvements 2023	0	0	0	0	0	0
<i>Year 2023 Total</i>	<i>20.5</i>	<i>26</i>	<i>37.7</i>	<i>0.05</i>	<i>2.7</i>	<i>1.46</i>
<b>Winter</b>						
Project Site Construction 2022	4.45	52.6	39.9	0.09	11.5	6.35
Frontage Improvements 2022	2.1	20.4	18.7	0.02	3.9	2.27
<i>Year 2022 Total</i>	<i>6.55</i>	<i>73</i>	<i>58.6</i>	<i>0.11</i>	<i>15.4</i>	<i>8.62</i>
Project Site Construction 2023	2.03	17	22.4	0.04	1.87	0.96
Frontage Improvements 2023	1.87	0.93	1.15	0	0.04	0.03
<i>Year 2023 Total</i>	<i>3.9</i>	<i>17.93</i>	<i>23.55</i>	<i>0.04</i>	<i>1.91</i>	<i>0.99</i>
<b>Maximum Daily Emissions</b>						
<b>Maximum Daily Emissions<sup>1</sup></b>	<b>20.5</b>	<b>73</b>	<b>58.6</b>	<b>0.11</b>	<b>15.4</b>	<b>8.62</b>
Year	2023	2022	2022	2022	2022	2022
Season	Summer	Winter	Winter	Same	Winter	Winter
<b>SCAQMD Significance Threshold</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>

Construction Year	Regional Pollutant Emissions (pounds per day)					
	VOCs	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Exceed Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<p>Notes:            CO = carbon monoxide            NO<sub>x</sub> = nitrogen oxides            PM<sub>10</sub> = particulate matter less than 10 microns in diameter            PM<sub>2.5</sub> = particulate matter less than 2.5 microns in diameter            SCAQMD = South Coast Air Quality Management District            SO<sub>x</sub> = sulfur oxides            VOC = volatile organic compound  <sup>1</sup> Assumes overlap of construction activities based on schedule presented in Appendix A.            The PM<sub>10</sub> and PM<sub>2.5</sub> emissions reflect the combined exhaust and mitigated fugitive dust emissions in accordance with SCAQMD Rule 403.            Source of Table: Appendix A.</p>						

As shown in above in Table 1, the proposed project’s construction emissions would not exceed the applicable significance threshold for any of the pollutants. In addition, the proposed project would be subject to PVCCSP EIR mitigation measures MM Air 2 through MM Air 9, which would further reduce construction emissions.

Therefore, the proposed project would have a less than significant impact related to regional air quality during project construction.

**Cumulative Operational Emissions**

Following project construction, long-term operational emissions would be generated, resulting from daily operations. Operational emissions for land use development projects are typically distinguished as mobile-, area-, and energy-source emissions. Mobile source emissions are those associated with automobiles that would travel to and from the project site. Assumptions used to estimate mobile source emissions that would be generated by the proposed project were consistent with those presented in the project-specific traffic study. The proposed project was estimated to generate 184 average daily passenger vehicle trips and 102 average daily truck trips during the operational period. Area-source emissions are those associated with natural gas combustion for space and water heating, landscape maintenance activities, and periodic architectural coatings. Energy-source emissions are those associated with electricity consumption and are more pertinent for greenhouse gas (GHG) emissions than air quality pollutants. Stationary source emissions are from a fire pump based on the information provided by the project applicant. The fire pump was assumed to be 100 horsepower and tested every month, for a total of 20 hours of use per year. Table 2 presents the proposed project’s maximum daily operational emissions.

**Table 2: Maximum Daily Operational Regional Pollutants**

Operational Activity	Regional Pollutant Emissions (pounds per day) <sup>1</sup>					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub> (Total)	PM <sub>2.5</sub> (Total)
Summer Area	4.82	0.06	7.19	< 0.005	0.01	0.01
Summer Energy	0.04	0.67	0.57	< 0.005	0.05	0.05
Summer Mobile	2.02	20.70	11.60	0.20	3.80	1.09
Summer Stationary (Fire Pump)	0.02	0.05	0.06	< 0.005	< 0.005	< 0.005
<i>Total Summer Emissions</i>	<i>6.90</i>	<i>21.48</i>	<i>19.42</i>	<i>0.20</i>	<i>3.86</i>	<i>1.15</i>
Winter Area	3.64	–	–	–	–	–
Winter Energy	0.04	0.67	0.57	< 0.005	0.05	0.05
Winter Mobile	1.97	21.60	10.20	0.20	3.80	1.09
Winter Stationary (Fire Pump)	0.02	0.05	0.06	< 0.005	< 0.005	< 0.005
<i>Total Winter Emissions</i>	<i>5.67</i>	<i>22.32</i>	<i>10.83</i>	<i>0.20</i>	<i>3.85</i>	<i>1.14</i>
<b>Overall Maximum Daily</b>	<b>6.90</b>	<b>22.32</b>	<b>19.42</b>	<b>0.20</b>	<b>3.86</b>	<b>1.15</b>
Season	Summer	Winter	Summer	Same	Summer	Summer
<b>SCAQMD Significance Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceed Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Notes: CO = carbon monoxide NO <sub>x</sub> = nitrogen oxides PM <sub>10</sub> = particulate matter less than 10 microns in diameter PM <sub>2.5</sub> = particulate matter less than 2.5 microns in diameter SCAQMD = South Coast Air Quality Management District SO <sub>x</sub> = sulfur oxides VOC = volatile organic compound <sup>1</sup> Emissions shown represent the maximum daily emissions from summer and winter seasons for each operational emission source and pollutant. Therefore, total daily operational emissions represent maximum daily emissions that could occur throughout the year. Source of Table: Appendix A.						

As shown in Table 2, the proposed project’s regional daily operational emissions would not exceed any of the SCAQMD thresholds of significance. Therefore, the proposed project would have less than significant impact related to regional air quality during project operation. The proposed project would also be subject to PVCCSP EIR mitigation measures MM Air 11 through MM Air 14, MM Air 19, and MM Air 20, which would further reduce operational emissions.

In addition, on May 7, 2021, the Governing Board of the SCAQMD adopted Rule 2305, the Warehouse Indirect Source Rule. Under this rule, the owners and operators of warehouses greater than 100,000 square feet are required to directly reduce NO<sub>x</sub> and particulate matter emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities. The warehouse rule is a menu-based points system requiring warehouse operators to annually earn

a specified number of points. These points can be earned by completing actions from a menu that can include acquiring and using natural gas, near zero-emissions and/or zero-emissions on-road trucks, zero-emission cargo handling equipment, solar panels or zero-emission charging and fueling infrastructure, or other options. The SCAQMD expects this rule to reduce emissions from warehouse uses by 10-15 percent. When developed, the proposed warehouse would be subject to this rule, thus further reducing the emissions of the proposed project.

**c) Expose sensitive receptors to substantial pollutant concentrations?**

**Less than significant impact.** This impact evaluates the potential for the proposed project’s construction and operational emissions to expose sensitive receptors to substantial pollutant concentration. Sensitive receptors are defined as those individuals who are sensitive to air pollution, including children, the elderly, and persons with pre-existing respiratory or cardiovascular illness. For purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities.<sup>20</sup> Commercial and industrial facilities are not included in the definition because employees do not typically remain on-site for 24 hours. However, when assessing the impact of pollutants with 1-hour or 8-hour standards (such as nitrogen dioxide [NO<sub>2</sub>] and CO), commercial and/or industrial facilities would be considered sensitive receptors. For the proposed project, the closest off-site sensitive receptor is a single-family home located approximately 470 feet north of the nearest project site.

To result in a less than significant impact, the following criteria must be true:

- **Criterion 1:** Localized significance threshold (LST) assessment: emissions and air quality impacts during project construction or operation must be below the applicable LSTs to screen out of needing to provide a more detailed air quality analysis. If the proposed project exceeds any applicable LST when the mass rate lookup tables are used as a screening analysis, then project-specific air quality modeling may be performed to determine significance.
- **Criterion 2:** A CO hotspot assessment must demonstrate that the proposed project would not result in the development of a CO hotspot that would result in an exceedance of the CO ambient air quality standards.
- **Criterion 3:** TAC analysis must demonstrate that TAC emissions from construction and operations of the proposed project would not result in significant health risk impacts to existing or proposed sensitive receptors.

**Criterion 1: Localized Significance Threshold Analysis—Criteria Pollutants**

The localized construction and operational analyses use thresholds (i.e., LSTs) that represent maximum emissions for a project that would not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard.<sup>21</sup> If the proposed project’s

<sup>20</sup> South Coast Air Quality Management District (SCAQMD). 2008. Final Localized Significance Threshold Methodology. Revised July 2008. Website: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed June 24, 2022.

<sup>21</sup> South Coast Air Quality Management District (SCAQMD). 2009. Final Localized Significance Threshold Methodology, Appendix C. Revised October 21, 2009. Website: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed June 24, 2022.

construction or operational emissions are under those thresholds, it follows that the project would not cause or contribute to an exceedance of the standard and would not expose sensitive receptors to substantial pollutant concentrations.

*Localized Construction Analysis*

The LST Methodology only applies to on-site emissions and states that “off-site mobile emissions from the project should not be included in the emissions compared to LSTs.” Therefore, for purposes of the construction LST analysis, only on-site emissions were compared with the applicable LSTs.

Utilizing the construction equipment list and associated acreages per 8-hour day provided in the SCAQMD “Fact Sheet for Applying CalEEMod to Localized Significance Thresholds,” the maximum number of acres disturbed in a day would be 3.5 acres during grading. To ensure a conservative analysis, the proposed project emissions have been compared to the 2-acre per day LST. The calculation sheet is included in Appendix A.

Table 3 presents the proposed project’s maximum daily on-site emissions compared with the applicable LSTs. As described previously, the closest sensitive receptor is 470 feet north from the closest project boundary, which is 143 meters. To make a conservative estimate, the LSTs have been obtained from the LST Methodology for 2-acre project site located in Source Receptor Area (SRA) 24 where sensitive receptors are 100 meters away. As noted in Table 3, emission estimates account for implementation of SCAQMD Rule 403, and the construction vehicle trip lengths are adjusted to 0.25 mile to represent localized emissions.

**Table 3: Construction Localized Significance Screening Analysis**

Activity	On-site Emissions (pounds per day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summer</b>				
Project Site Construction 2022	44.6	37.7	9.69	5.78
Frontage Improvements 2022	16.8	14.2	3.25	1.92
<i>Year 2022 Total</i>	<i>61.4</i>	<i>51.9</i>	<i>12.94</i>	<i>7.7</i>
Project Site Construction 2023	24.9	29.7	1.2	1.09
Frontage Improvements 2023	–	–	–	–
<i>Year 2023 Total</i>	<i>24.9</i>	<i>29.7</i>	<i>1.2</i>	<i>1.09</i>
<b>Winter</b>				
Project Site Construction 2022	44.7	37.7	9.69	5.78
Frontage Improvements 2022	20.3	17.9	3.74	2.23
<i>Year 2022 Total</i>	<i>65.0</i>	<i>55.6</i>	<i>13.43</i>	<i>8.01</i>
Project Site Construction 2023	15.9	18.3	0.74	0.67
Frontage Improvements 2023	0.93	1.15	0.04	0.03
<i>Year 2023 Total</i>	<i>16.8</i>	<i>19.5</i>	<i>0.8</i>	<i>0.70</i>



Activity	On-site Emissions (pounds per day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Overall Maximum Daily Emissions<sup>1</sup></b>				
<b>Maximum Daily On-site Construction Emissions<sup>1</sup></b>	<b>65</b>	<b>55.6</b>	<b>13.43</b>	<b>8.01</b>
Year	2022	2022	2022	2022
Season	Winter	Winter	Winter	Winter
<b>Localized Significance Threshold (SRA 24, 2-acre site, 100 meter)</b>	<b>264</b>	<b>2,232</b>	<b>38</b>	<b>10</b>
<b>Exceed Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Notes: CO = carbon monoxide NO <sub>x</sub> = nitrogen oxides PM <sub>10</sub> = particulate matter with an aerodynamic resistance diameter of 10 micrometers or less PM <sub>2.5</sub> = particulate matter with an aerodynamic resistance diameter of 2.5 micrometers SCAQMD = South Coast Air Quality Management District SRA = Source Receptor Area <sup>1</sup> Assumes overlap of construction activities based on construction schedule shown in Appendix A. The PM <sub>10</sub> and PM <sub>2.5</sub> emissions reflect the combined exhaust and mitigated fugitive dust emissions in accordance with SCAQMD Rule 403. Source of emissions: Appendix A. Source of thresholds: South Coast Air Quality Management District (SCAQMD) 2009, for SRA 24, 2-acre site, 100 meters from nearest sensitive receptor.				

As shown in Table 3, the proposed project’s maximum daily on-site emissions would not exceed the applicable SCAQMD LSTs for NO<sub>x</sub>, CO, PM<sub>10</sub> and PM<sub>2.5</sub>; therefore, localized construction impacts related to these air pollutants would be less than significant.

*Localized Operational Analysis*

Similar with the construction LST analysis above, the applicable operational LSTs were obtained for a project located in SRA 24 with the nearest sensitive receptor being 100 meters away. Long-term operations would occur for the proposed project on the approximately 7.5-acre project site, and LSTs were obtained for a 2-acre site.

As described above, the LST Methodology recommends that only on-site emissions are evaluated using LSTs. Because most of the proposed project’s mobile source emissions would occur on the local and regional roadway network away from the project site, truck trip emissions and on-site area-, energy-, and mobile source emissions were included in this analysis. A trip length of 0.5-mile was used in the modeling input assumptions to account for on-site emissions and from mobile sources. The 0.5-mile on-site trip length is a conservative estimate that takes into account the maximum project site distance a vehicle could travel, not the most likely or fastest route, to ensure all potential impacts are considered. Table 4 presents the project’s maximum daily on-site emissions compared with the appropriate LSTs.

**Table 4: Operational Localized Screening Significance Analysis**

Emissions Source	Pounds per Day			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Maximum Daily On-site Operational Emissions</b>	<b>2.08</b>	<b>10.01</b>	<b>0.11</b>	<b>0.07</b>
Season	Winter	Summer	Summer	Summer
<b>Localized Significance Thresholds (SRA 24, 2-acre site, 100 meter)</b>	<b>264</b>	<b>2,232</b>	<b>10</b>	<b>3</b>
<b>Exceeds Screening Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Notes: CO = carbon monoxide NO <sub>x</sub> = nitrogen oxides PM <sub>10</sub> = particulate matter less than 10 microns in diameter PM <sub>2.5</sub> = particulate matter less than 2.5 microns in diameter Source of Emissions: Appendix A. Source of thresholds: SCAQMD Mass Rate Lookup Tables for a 2-acre site in SRA 24 for sensitive receptors located 100 meters from the project site.				

As shown in Table 4, the proposed project’s maximum daily on-site operational emissions would not exceed any applicable SCAQMD LSTs. Therefore, the proposed project’s operational activities would not cause or contribute substantially to an existing or future ambient air quality standard violation. Accordingly, the proposed project’s operational criteria air pollutant and ozone precursor concentrations would not expose sensitive receptors to substantial pollutant concentrations. The impact would be less than significant.

**Criterion 2: Carbon Monoxide Hotspot Analysis**

As identified in the Traffic Memorandum (Appendix I), the project would generate up to 27 trips in the AM peak-hour and 29 trips in the PM peak-hour.<sup>22</sup> The Traffic Memorandum determined that the proposed project would generate up to 286 average daily trips, including trucks and passenger cars. As described in the Traffic Analysis, project-generated passenger car and truck trips would be distributed throughout the day and would not impact local roadways at one time, further reducing the potential impacts to CO. As a result, none of the intersections near the proposed project site would have peak-hour traffic volumes exceeding those at the intersections modeled in the 2003 AQMP. Additionally, the adjacent roadways are not located in an area where vertical or horizontal atmospheric mixing is substantially limited, such as a tunnel or overpass. Furthermore, there are no factors unique to the local meteorology to conclude that this intersection would yield higher CO concentrations if modeled in detail. Therefore, the operational CO impact would be less than significant.

<sup>22</sup> Urban Crossroad. 2022. Ramona Expressway and Brennan Warehouse Vehicle Miles Traveled Screening Evaluation. April.

### **Criterion 3: Toxic Air Contaminants**

#### *Toxic Air Pollutants—On-site Workers*

A variety of State and national programs protect workers from safety hazards, including high air pollutant concentrations.<sup>23,24</sup>

On-site workers are not required to be addressed through the Health Risk Assessment (HRA) process. A document published by the California Air Pollution Control Officers Association (CAPCOA), *Health Risk Assessments for Proposed Land Use Projects*, indicates that on-site receptors are included in risk assessments if they are persons not employed by the project.<sup>25</sup> Persons not employed by the proposed project would not remain on-site for any significant period. Therefore, an HRA for on-site workers is not required or recommended. No further discussion is necessary.

#### *Health Risk Assessment*

During construction and operation, the proposed project would result in emissions of several TACs that could potentially impact nearby sensitive receptors. The SCAQMD has defined health risk significance thresholds. These thresholds are represented as a cancer risk to the public and a non-cancer hazard from exposures to TACs. Cancer risk represents the probability (in terms of risk per million individuals) that an individual would contract cancer resulting from exposure to TACs continuously over a period of several years. The principal TAC emission analyzed in this assessment was DPM from operation of off-road equipment and diesel-powered delivery and worker vehicles during construction and operation. DPM has been identified by the ARB as a carcinogenic substance. For purposes of this analysis, DPM is represented as exhaust emissions of PM<sub>10</sub>.

#### *Estimation of Cancer Risks*

Cancer risks are estimated as the upper-bound incremental probability that an individual will develop cancer as a direct result of exposure to potential carcinogens over a specified exposure duration. The cancer risk attributed to a chemical is calculated by multiplying the chemical intake or dose at the human exchange boundaries (e.g., lungs) by the chemical-specific cancer potency factor (CPF). A risk level of 10 in a million implies a likelihood (or risk) that up to 10 persons out of 1 million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of TACs over a specified duration of time. This risk would be an excess cancer risk that is in addition to any environmental cancer risk borne by a person not exposed to these air toxics.

The California Office of Environmental Health Hazard Assessment (OEHHA) has developed guidance for estimating cancer risks that considers the increased sensitivity of infants and adults to TAC emissions, different breathing rates, and time spent at home. This guidance was applied in estimating cancer risks from the construction and operation of the proposed project. The recommend method for the estimation of cancer risk is shown in Appendix A. The principal toxicological endpoint assumed in this assessment was through inhalation.

<sup>23</sup> Occupational Safety and Health Administration (OSHA). 2003. United States Department of Labor. Safety and Health Topics: Methane. Website: [www.osha.gov/dts/chemicalsampling/data/CH\\_250700.html](http://www.osha.gov/dts/chemicalsampling/data/CH_250700.html). Accessed June 24, 2021.

<sup>24</sup> Centers for Disease Control and Prevention (CDC). 2012. Construction—website: [www.cdc.gov/niosh/construction/](http://www.cdc.gov/niosh/construction/). Indoor Environmental Quality—website: [www.cdc.gov/niosh/topics/indoorenv/constructionieq.html](http://www.cdc.gov/niosh/topics/indoorenv/constructionieq.html). Accessed June 24, 2021.

<sup>25</sup> California Air Pollution Control Officers Association (CAPCOA). 2009. *Health Risk Assessments for Proposed Land Use Projects*.

*Toxic Air Contaminant Construction Analysis*

Major sources of DPM during construction include off-road construction equipment and heavy-duty delivery truck activities. The results of the HRA prepared for project construction for cancer risk and long-term chronic cancer risk are summarized below. Air dispersion modeling was utilized to assess the proposed project’s potential health risks using the American Meteorological Society/EPA Regulatory Model (AERMOD), which is the air dispersion model accepted by the EPA and the SCAQMD for preparing HRAs. Exhaust emissions of DPM (as PM<sub>10</sub> exhaust) were estimated using CalEEMod. The construction emissions were assumed to be distributed over the project area with a working schedule of 8 hours per day and 5 days per week. Emissions were adjusted by a factor of 4.2 to convert for use with a 24-hour-per-day, 365-day-per-year averaging period. Detailed parameters, a description of methodology, and complete calculations are contained in Appendix B of the Air Quality, Greenhouse Gas Emissions, and Energy Report.

The estimated health and hazard impacts at the Maximally Impacted Sensitive Receptor (MIR) from the proposed project’s construction emissions, prior to incorporation of mitigation are provided in Table 5.

**Table 5: Estimated Health Risks and Hazards During Project Construction (Unmitigated)**

Source	Cancer Risk (risk per million)	Chronic Non-Cancer HI <sup>1</sup>
Risks and Hazards at the MIR: Infants	6.41	0.016
Risks and Hazards at the MIR: Child	1.91	0.016
Risks and Hazards at the MIR: Adult	0.14	0.016
<b>Significance Threshold</b>	<b>10</b>	<b>1</b>
<b>Exceeds Individual Source Threshold?</b>	<b>No</b>	<b>No</b>
Notes: µg/m <sup>3</sup> = micrograms per cubic meter DPM = diesel particulate matter HI = hazard index MIR = Maximally Impacted Sensitive Receptor PM <sub>10</sub> = particulate matter less than 10 microns in diameter REL = Reference Exposure Level <sup>1</sup> Chronic non-cancer HI was estimated by dividing the maximum annual DPM concentration (as PM <sub>10</sub> exhaust) by the REL of 5 µg/m <sup>3</sup> . Source: Appendix B of Air Quality, Greenhouse Gas Emissions, and Energy Report.		

As noted in Table 5, construction of the proposed project would not exceed the cancer risk and non-cancer hazard index significance thresholds. Therefore, the proposed project would not result in a significant impact on nearby sensitive receptors from TACs during construction.

*Toxic Air Contaminant Operational Analysis*

As described in Appendix A, PVCCSP mitigation measure MM Air 15 requires that, to identify potential implementing development project-specific impacts resulting from the use of diesel trucks, proposed development projects that include an excess of 10 dock doors for a single building, and

that are subject to CEQA and are located adjacent to sensitive land uses, shall have a facility-specific HRA performed to assess the DPM impacts from mobile source traffic generated by that implementing development project. The proposed project would include 22 dock doors; therefore, an operational HRA was conducted to assess the impact. Results of the operational HRA are assessed below, and the full HRA is included as part of Appendix A Air Quality, Greenhouse Gas Emissions, and Energy Report.

The proposed project would primarily generate passenger vehicle trips from employees, visitors, and light-duty delivery vehicles traveling to and from the project site; however, the proposed project would also be served with daily truck deliveries. The main source of DPM from the long-term operations of warehouses is from combustion of diesel fuel in diesel-powered engines in heavy-duty trucks. Motor vehicle emissions refer to DPM exhaust emissions from the motor vehicle traffic that would travel to and from the project site each day. An estimate of the number of vehicle trips that the proposed project would generate was prepared by Urban Crossroads in the Trip Generation Assessment, as shown in Appendix I.

Operational emissions for the proposed project were assessed assuming the first year of operations would occur in 2023. The emission factors, AERMOD Output, and emission estimation spreadsheets used to estimate motor vehicle DPM emissions during project operations are provided in Appendix A of the Air Quality, Greenhouse Gas Emissions, and Energy Report.

The results of the HRA prepared for project operations for cancer risk and long-term chronic cancer risk are summarized below. Similar to the HRA performed for construction emissions, air dispersion modeling was utilized to assess the proposed project’s potential health risks using AERMOD. Exhaust emissions of DPM (as PM<sub>10</sub> exhaust) were estimated using Emissions Factors mobile source emissions model (EMFAC2021). The OEHHA-recommended values for the various cancer risk parameters used in the operational HRA are provided below in Table 6. The parameters and methodology are summarized and provided in full in Air Quality, Greenhouse Gas Emissions, and Energy Report prepared for the proposed project.

**Table 6: Exposure Assumptions for Cancer Risk**

Receptor Type	Exposure Frequency		Exposure Duration (years)	Age Sensitivity Factors	Time at Home Factor (%)	Daily Breathing Rate <sup>1</sup> (l/kg-day)
	Hours/day	Days/year				
<b>Sensitive/Residential—Infant (Third Trimester)</b>						
Third Trimester	24	350	0.25	10	1	361
0–2 years	24	350	2	10	1	1,090
<b>Sensitive Receptor—Child</b>						
3–16 years	24	350	14	3	1	572
<b>Sensitive Receptor—Adult</b>						
> 16 to 30 years	24	350	14	1	73	261
> 30 years	24	350	1	1	73	233

Receptor Type	Exposure Frequency		Exposure Duration (years)	Age Sensitivity Factors	Time at Home Factor (%)	Daily Breathing Rate <sup>1</sup> (l/kg-day)
	Hours/day	Days/year				
Notes:						
<sup>1</sup> The daily breathing rates for sensitive/residential receptors assume the 95th percentile breathing rates for all individuals less than 2 years of age and 80th percentile breathing rates for all older individuals.						
(l/kg-day) = liters per kilogram body weight per day						
Source: Appendix A Air Quality, Greenhouse Gas Emissions, and Energy Report.						

An operational HRA was performed to determine calculate the cancer health risks and the non-hazard indices for sensitive receptors within approximately 2,000 feet of the project boundary. Because the same off-site receptors would be exposed to emissions from both construction and operation of the proposed project, DPM (as PM<sub>10</sub> exhaust) from short-term construction of the project and long-term operations of the project were combined to calculate the cancer health risk and the non-hazard index to determine the MIR. Because the early year factors are the highest, risks for operations alone were also evaluated. The results of this analysis are summarized in Table 7.

**Table 7: Summary of Health Risk Impacts From Project Operations (30-Year Exposure)**

Health Impact Metric	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index <sup>(1)</sup>
<b>Construction and Operations</b>		
Risks and Hazards at the MIR over 30-year exposure	8.55	0.016
<b>SCAQMD Significance Threshold</b>	<b>10</b>	<b>1</b>
<b>Exceeds Individual Source Threshold?</b>	<b>No</b>	<b>No</b>
<b>Operations Only</b>		
Risks and Hazards at the MIR over 30-year exposure	2.55	0.004
<b>SCAQMD Significance Threshold</b>	<b>10</b>	<b>1</b>
<b>Exceeds Individual Source Threshold?</b>	<b>No</b>	<b>No</b>
Notes:		
µg/m <sup>3</sup> = micrograms per cubic meter		
DPM = diesel particulate matter		
HI = hazard index		
MIR = Maximally Impacted Sensitive Receptor		
REL = Reference Exposure Level		
SCAQMD = South Coast Air Quality Management District		
<sup>1</sup> Chronic non-cancer hazard index was estimated by dividing the annual DPM concentration (as PM <sub>2.5</sub> exhaust) by the REL of 5 µg/m <sup>3</sup> .		
Source: Appendix A Air Quality, Greenhouse Gas Emissions, and Energy Report.		

The maximum cancer risks at the MIR over the approximate 10-month construction period combined with cancer risks over a 30-year operational exposure duration would be less than 10 in one million, and the maximum hazard index for chronic HI would be less than 0.1. As noted in Table

7, the health risks and hazard index are below the SCAQMD’s thresholds of significance under all scenarios analyzed. Therefore, the proposed project’s operation would not expose sensitive receptors to substantial pollutant concentrations.

*Cumulative Toxic Air Contaminant Operational Analysis*

As previously discussed, projects that exceed project-specific significance thresholds are considered by the SCAQMD cumulatively considerable. Conversely, projects that do not exceed project-specific thresholds are generally not considered cumulatively significant. As discussed in Criteria 1 through 3, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Since the proposed project would not exceed project-specific thresholds it would not be considered to result in cumulatively significant impacts.

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

**Less than significant impact.** Two situations create a potential for odor impact. The first occurs when a new odor source is located near an existing sensitive receptor. The second occurs when a new sensitive receptor locates near an existing source of odor.

Odors can cause a variety of responses. The impact of an odor is dependent on interacting factors such as frequency (how often), intensity (strength), duration (in time), offensiveness (unpleasantness), location, and sensory perception. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies.

The SCAQMD does not provide a suggested screening distance for a variety of odor-generating land uses and operations. However, the San Joaquin Valley Air Pollution Control District (Valley Air District) does have a screening distance for odor sources. Those distances are used as a guide to assess whether nearby facilities could be sources of significant odors. Proposed projects that would site a new sensitive receptor farther than the applicable screening distances from an existing odor source are not likely to have a significant impact. The SCAQMD considers residences, schools, daycare centers, playgrounds, and medical facilities as sensitive receptor land uses. The closest sensitive receptor located near the project site is a single-family home located 470 feet north from the closest project boundary.

These screening distances by type of odor generator are listed in Table 8.

**Table 8: Screening Levels for Potential Odor Sources**

Odor Generator	Screening Distance
Wastewater Treatment Facilities	2 miles
Sanitary Landfill	1 mile
Transfer Station	1 mile
Composting Facility	1 mile



Odor Generator	Screening Distance
Petroleum Refinery	2 miles
Asphalt Batch Plant	1 mile
Chemical Manufacturing	1 mile
Fiberglass Manufacturing	1 mile
Painting/Coating Operations (e.g., auto body shop)	1 mile
Food Processing Facility	1 mile
Feed Lot/Dairy	1 mile
Rendering Plant	1 mile
Source: Source: San Joaquin Valley Air Pollution Control District (Valley Air District). 2015. Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI). February 19. Website: <a href="https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF">https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF</a> . Accessed June 24, 2022.	

### **Construction-Related Odors**

Potential sources that may emit odors during construction activities include exhaust from diesel construction equipment. However, because of the temporary nature of these emissions, the intermittent nature of construction activities, and the highly diffusive properties of diesel PM exhaust, nearby receptors would not be affected by diesel exhaust odors associated with project construction. Odors from these sources would be localized and generally confined to the immediate area surrounding the proposed project site. The proposed project would utilize typical construction techniques and the odors would be typical of most construction sites. As such, the proposed project would not cause odors that adversely affect a substantial number of people during the construction period; impacts during construction would be less than significant.

### **Operational-Related Odors**

The proposed project includes the construction and development of a warehouse building, parking spaces, and associated landscaping. Land uses that are typically identified as sources of objectionable odors include landfills, transfer stations, sewage treatment plants, composting facilities, feedlots, coffee roasters, asphalt batch plants, and rendering plants. The end uses of the proposed warehouse would involve e-commerce distribution. The proposed project would not produce any offensive odor emitting end uses such as coffee roasting, composting, feed lots, refining, sewage treatment, or solid waste management and would not be considered an odor generator as identified in Table 8. Additionally, since the proposed project would not include new sensitive receptors, such as residences, the proposed project would not locate new sensitive receptors near an odor source. Therefore, the proposed project would not be a generator of objectionable odors during operations. Minor sources of odors, such as exhaust from mobile sources, are not typically associated with numerous odor complaints but are known to have temporary and less concentrated odors. In summary, the project’s long-term operational activities would not have any substantial odor sources that would expose nearby receptors. Considering the low intensity of potential odor emissions, the proposed project’s operational activities would not expose receptors to objectionable odor emissions.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

The proposed project is required to comply with the following applicable mitigation measures from the PVCCSP EIR. The Air Quality, Greenhouse Gas Emissions, and Energy Report prepared by FCS (Appendix A) was prepared to satisfy the requirements of PVCCSP EIR mitigation measures MM Air 1, MM Air 10, and MM Air 15. Furthermore, PVCCSP mitigation measure MM Air 18 has been satisfied through consultation with the Riverside Transit Authority (RTA) for future plans of bus routing with any street adjacent to the proposed project, which is further detailed in Section 2.17, Transportation, of this Draft IS/MND. Therefore, these mitigation measures are not listed below.

#### MM Air 2

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

#### MM Air 3

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

- requiring the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain),
- keeping disturbed/loose soil moist at all times,
- requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered,
- installation of wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip,
- posting and enforcement of traffic speed limits of 15 miles per hour or less on all unpaved portions of the project site,
- suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 miles per hour,

- appointment of a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM-10 generation,
- sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks when sweeping streets to remove visible soil materials,
- replacement of ground cover in disturbed areas as quickly as possible.

**MM Air 4** Building and grading permits shall include a restriction that limits idling of construction equipment on-site to no more than 5 minutes.

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

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

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

**MM Air 8** Each individual implementing development project shall apply paints using either high volume low pressure (HVLP) spray equipment with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.

**MM Air 9** To reduce VOC emissions associated with architectural coating, the project designer and contractor shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g., bathroom stall dividers, metal awnings),

materials that do not require painting, and require coatings and solvents with a VOC content lower than required under Rule 1113 to be utilized. The construction contractor shall be required to utilize “Super-Compliant” VOC paints, which are defined in SCAQMD’s Rule 1113. Construction specifications shall be included in building specifications that assure these requirements are implemented. The specifications for each implementing development project shall be reviewed by the City of Perris’ Building Division for compliance with this mitigation measure prior to issuance of a building permit for that project.

- MM Air 11** Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of 5 minutes.
- MM Air 12** Where Transport Refrigeration Units (TRUs) are in use, electrical hookups will be installed at all loading and unloading stalls in order to allow TRUs with electric standby capabilities to use them.
- MM Air 13** In order to promote alternative fuels, and help support “clean” truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD’s Carl Moyer Program, or other State programs that restrict operations to “clean” trucks, such as 2007 or newer model year or 2010 compliant vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, ARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year will be used at a facility with three or more dock-high doors, the developer/ successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP, HVIP, and SOON funding programs, as identified on SCAQMD’s website (<http://www.aqmd.gov>). Tenants will be required to use those funds, if awarded.
- MM Air 14** Each implementing development project shall designate parking spaces for high-occupancy vehicles and provide larger parking spaces to accommodate vans used for ride sharing. Proof of compliance will be required prior to the issuance of occupancy permits.
- MM Air 19** In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g., electrical plans, improvement maps) submitted to the City shall include the installation of energy efficient street lighting throughout the project site. These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris’ Building Division) prior to conveyance of applicable streets.
- MM Air 20** Each implementing development project shall be encouraged to implement, at a minimum, an increase in each building’s energy efficiency 15 percent beyond

Title 24, and reduce indoor water use by 25 percent. All requirements will be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.

### **Project-specific Mitigation Measures**

No project-specific air quality mitigation measures were required to reduce potential impacts to less than significant levels; therefore, no additional project-specific air quality mitigation measures would apply to the proposed project.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.4 Biological Resources</b>				
<i>Would the project:</i>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

The analysis in this section is based, in part, on the Biological Resources Assessment (BRA) and Western Riverside Multiple Species Habitat Conservation Plan (WR-MSHCP) Consistency Analysis and Report prepared by FCS on April 28, 2022. The BRA and MSHCP Consistency Analysis Report, summarized below, can be found in Appendix B.

## Introduction and Purpose

The purpose of the BRA was to (1) document existing and potentially occurring biological resources on the project site and adjacent areas; (2) analyze potential project-related impacts on regulated biological resources; (3) summarize relevant local, State, and federal regulations; and (4) recommend appropriate measures to mitigate potential impacts on biological resources to less than significant levels. The purpose of the MSHCP Consistency Analysis was to identify and analyze requirements of the MSHCP and any biological constraints to development of the proposed project, and to determine project consistency with goals, objectives, and requirements of the MSHCP.

Much of the analyses in the BRA and MSHCP Consistency Analysis focused on potential project impacts on special-status species. Special-status plant and wildlife species are those designated by federal, State, local, or scientific organizations as needing protection because of rarity or threats to their existence. Special-status plant and wildlife species include those listed as threatened, endangered, or proposed for listing; Special-status species are those animal and plant species that, in the judgment of the resource agencies, trustee agencies, and certain non-governmental organizations, warrant special consideration in the CEQA process. This includes the following species:

- Officially designated “threatened,” “endangered,” or “candidate” species federally listed by the United States Fish and Wildlife Service (USFWS) and protected under the federal Endangered Species Act.
- Officially designated “rare,” “threatened,” “endangered,” or “candidate” species State listed by the California Department of Fish and Wildlife (CDFW) and protected under the California Endangered Species Act (CESA). CDFW also maintains a list of “Fully Protected” species as well as “California Special Concern” species that are also generally included as special-status species under CEQA.
- Species considered rare, threatened, or endangered under the conditions of Section 15380 of the State CEQA Guidelines, such as plant species identified on lists 1A, 1B, and 2 in the CNPS Inventory.
- Bat species listed as Medium or High Priority by the Western Bat Working Group.

Other species considered sensitive, such as nests of birds listed in the Migratory Bird Treaty Act (MBTA), which includes most native birds, and plant species identified on lists 3 and 4 in the CNPS Inventory. The analysis also considered potential project impacts on potentially jurisdictional waters, nesting birds, breeding or movement habitats, local ordinances, Habitat Conservation Plans (HCPs) and Natural Community Conservation Plans (NCCPs), MBTA, and Fish and Game Codes.

## Methods

The BRA and MSHCP Consistency Analysis included a review of existing environmental documentation for the project site and vicinity, including literature pertaining to the habitat requirements of special-status species with the potential to occur in the project vicinity; and federal register listings, protocols, and species data provided by the USFWS and CDFW. FCS also reviewed topographic maps, aerial photographs, and published soil surveys, and queried special-status species



databases, including the USFWS Information for Planning and Consultation (IPaC) database<sup>26</sup>, the California Natural Diversity Database (CNDDDB),<sup>27</sup> and the CNPS Electronic Inventory (CNPSEI) of Rare and Endangered Vascular Plants of California.<sup>28</sup> To support the MSHCP Consistency Analysis, FCS accessed the Regional Conservation Authority (RCA) MSHCP Information Map.<sup>29</sup>

The BRA and MSHCP Consistency Analysis included a visit to the project site on March 24, 2022, to ascertain general site conditions and identify whether existing vegetation communities provide suitable habitat for special-status plant or wildlife species. During the site visit the FCS Biologist characterized and mapped vegetation communities, identified and recorded plants and wildlife observed on-site, and recorded evidence of wildlife habitats, including wildlife corridors, nests, dens, or burrows. The data gathered during the site visit was used to analyze the potential for special-status species to occur on the project site based on existing biological conditions on and adjacent to the site.

## Results

FCS Senior Biologist Michael Tuma, PhD, conducted a general biological survey of the project site on March 24, 2022, between approximately 9:00 a.m. to 10:30 a.m. Weather conditions during the field surveys were sunny and clear, with an average temperature around 65°F (degrees Fahrenheit), and wind speeds between 0 and 3 mph. The literature and database reviews were conducted on March 22, 2022.

### **Biological Conditions On-site**

The project site consists of developed lands used for outdoor equipment storage. The northern portion of the project site was formerly used for storage of wooden pallets and was recently cleared. This area was open and vegetated in ruderal species at the time of the survey. The southern portion of the project site is still used for storage of materials and includes several outbuildings and numerous metal shipping containers. The landowner was actively using the larger outbuilding at the time of the survey.

Dr. Tuma recorded ruderal/disturbed habitat in the northern portion of the project site in areas where pallets were previously stored. Soils in this area are highly disturbed, with inclusions of debris, trash, and gravel that indicate previous dumping and grading. The soil surface is bare in areas but mostly vegetated in non-native and native ruderal species. The southern portion of the project site supports outbuildings, storage containers, and stored equipment and is considered urban/developed land. Additional urban/developed lands occur within 500 feet of the project site, and include industrial, commercial, and residential developments.

<sup>26</sup> United States Fish and Wildlife Service (USFWS). 2021. Information for Planning and Consultation (IPaC). Website: <https://ecos.fws.gov/ipac/>. Accessed March 22, 2022.

<sup>27</sup> California Department of Fish and Wildlife (CDFW). 2021. CNDDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: <https://map.dfg.ca.gov/rarefind/view/RareFind.aspx>. Accessed March 22, 2022.

<sup>28</sup> California Native Plant Society (CNPS). 2021. California Native Plant Society Rare and Endangered Plant Inventory. Website: <http://www.rareplants.cnps.org/>. Accessed March 22, 2022.

<sup>29</sup> Regional Conservation Authority (RCA). RCA MSHCP Information Map. Website: <https://wrcrca.maps.arcgis.com/apps/webappviewer/index.html?id=a73e69d2a64d41c29ebd3acd67467abd>. Accessed March 22, 2022.

The vegetation community and land cover types on the project site provide habitat for numerous wildlife species. As well, the anthropogenic features on the project site (buildings, shipping containers, stored equipment, and concrete foundations) could provide habitat for numerous wildlife species. Wildlife activity during the general biological reconnaissance survey was moderate and consisted primarily of avian species. The project site itself does not serve as a wildlife movement corridor, and there are no potentially jurisdictional habitats on-site, including wetlands or waters of the United States or riparian/riverine habitat.

### **Database Reviews**

There are no sensitive natural communities on or adjacent to the project site. Twenty-two special-status plant species have been recorded within 10 miles of the project site or on the nine-quadrangle search area (Appendix B). The project site is significantly disturbed and surrounded by urbanized development and undeveloped lands that have been repeatedly disturbed (disked). Because of the conditions on and adjacent to the project site, all special-status that occur in the region were assessed as having low or no potential for occurrence. Therefore, special-status plants are not expected to occur on the project site.

Forty-four special-status wildlife species were identified as occurring within 10 miles of the project site as recorded in the CNDDDB and an additional three species were identified in the USFWS IPaC review. It was determined that the project site contains suitable habitat conditions that provide moderate potential for burrowing owl (*Athene cunicularia*) and California horned lark (*Eremophila alpestris actia*).

### **MSHCP Consistency Analysis**

The project site is located within the Mead Valley Area Plan of the MSHCP but not “within or adjacent to” a Criteria Cell or Conservation Area or within any Linkage. Because of its location outside of any Criteria Cells or Cell Groups, the project is not subject to Reserve Assembly Analysis requirements under the MSHCP. Because the project site is not within or adjacent to any MSHCP Conservation Areas, the proposed project is not subject to guidelines pertaining to the urban/wildlands interface or other requirements under the MSHCP pertaining to projects or actions implemented within or adjacent to a Conservation Area.

The project site is located in the burrowing owl covered species survey area and is therefore subject to MSHCP survey requirements for this species. There is no riparian/riverine habitat on the project site or within 500 feet, and the proposed project is therefore not subject to riparian/riverine requirements under the MSHCP, including surveys for riparian/riverine bird species. There are no vernal pools or features indicative of the historic presence of vernal pools on the project site or within 500 feet.

## Impact Analysis

Would the project:

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?**

**Less than significant impact with mitigation incorporated.** The project site and adjacent lands contain suitable non-native grassland habitat with low-growing vegetation, providing conditions that provide at least a moderate potential for burrowing owls to occur there as a breeder, winter resident, and/or for post-breeding dispersal prior to its development. Burrows, nests, eggs, and young of breeding burrowing owls are protected under the MBTA and Fish and Game Codes, and CDFW also prohibits impacts to burrowing owls during the nonbreeding season. Take of burrowing owl is covered under the MSHCP under certain conditions, including a requirement for pre-project surveys and, if owls are discovered on-site, agency consultation and implementation of a Burrowing Owl Mitigation Plan. Ground-disturbing construction activities conducted on the project site could impact any burrowing owl(s) occupying the site during the breeding season (February 1 through August 31) or nonbreeding season (September 1 through January 31), which would be considered significant. With the implementation of PVCCSP EIR mitigation measure MM Bio 2 and project-specific mitigation measure MM BIO-1 through MM BIO-6, potential impacts to burrowing owl would be reduced to less than significant levels.

The non-native grassland areas on and adjacent to the project site may also provide suitable foraging and nesting habitat for California horned lark and other native and migratory birds protected by the MBTA and Fish and Game Codes. As well, the remainder of the project site and adjacent areas contain numerous surfaces, structures, and vegetation that could provide suitable nesting habitat for bird species protected under the MBTA and the Fish and Game Codes. If ground-disturbing or vegetation-removing construction activities are initiated during the nesting season, they could disturb nesting and breeding birds on the ground surface, in trees and shrubs, and on structures on and adjacent to the project site, which would be considered significant. Potential construction-related project impacts on special-status and migratory birds include destruction of eggs or occupied nests, mortality of young, and causing parental abandonment of nests with eggs or pre-fledged young birds. With the implementation of PVCCSP EIR mitigation measure MM Bio 1 and project-specific mitigation measures MM BIO-3 through MM BIO-6, potential impacts to nesting California horned larks and other native and migratory birds would be reduced to a less than significant level and no further project-specific mitigation is necessary.

- b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?**

**No impact.** The project site does not contain riparian habitat or other sensitive natural communities. The assessment for riparian habitat conducted as part of the BRA and MSHCP Consistency Analysis for the proposed project satisfy PVCCSP EIR mitigation measures MM Bio 3 and MM Bio 4, which

require project-specific delineations of jurisdictional features and mapping or riparian and unvegetated riverine features. No riparian or other sensitive natural communities were recorded on or adjacent to the project site; therefore, the proposed project would have no impact on any riparian habitat or other sensitive natural community.

- c) **Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

**No impact.** The project site does not contain any State or federally protected wetlands, nor any vernal pools or features indicative of the historic presence of vernal pools on the project site or within 500 feet. The project site has been developed previously and does not support any protected wetlands. Therefore, the proposed project would have no impact on wetlands. It should also be noted that an assessment of vernal pools, riparian riverine habitat, wetlands, and hydrological features was conducted on and adjacent to the project site as part of the BRA and MSHCP Consistency Analysis. The completion of this assessment satisfies PVCCSP EIR mitigation measures MM Bio 3 and MM Bio 4, which require project-specific delineations of any jurisdictional features. Because there are no wetlands or vernal pools on or adjacent to the project site, the proposed project would have no impact related to effects on State or federally protected wetlands or vernal pools.

- 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 wildlife nursery sites?**

**Less than significant impact.** The project site does not lie along any known wildlife movement corridor. The majority of the project site consists of developed lands used for outdoor storage of materials. The project site is also surrounded by roads, highways, and urban development to the east and north that limits wildlife movement to and from the project site in those directions. As indicated in the BRA and MSHCP Consistency Analysis, the property owner reported seeing coyotes and striped skunks walking along the western boundary of the property at night. These animals are likely accessing the project site, or along its border, from the large ruderal field west of the project site. However, the project site itself does not serve as a wildlife movement corridor. Because of the presence of these existing barriers, the site does not function as a wildlife movement corridor or wildlife nursery site. Therefore, impacts to wildlife corridors or linkages are anticipated to be less than significant and the proposed project would have a less than significant impact on wildlife movement. No PVCCSP or project-specific mitigation is applicable or required.

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

**Less than significant impact.** The Perris Municipal Code<sup>30</sup> protects special-status trees, including Street Trees, Heritage Trees, and Specimen Trees. There are no special-status trees, as defined under

<sup>30</sup> City of Perris. 2022. Perris Municipal Code. Chapter 19.71, Urban Forestry Establishment and Care. Section 19.71.050. Tree

the ordinance, on or adjacent to the project site. If trees are planted in a sidewalk parkway or other public space as part of the project construction, the project applicant shall select approved Street Trees and comply with the landscape requirements of the PVCCSP. Therefore, the proposed project would not conflict with any local policies or ordinances protection biological resources, such as a tree preservation policy or ordinance. Impacts would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

**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?**

**Less than significant impact with mitigation incorporated.** The project site lies within the boundaries of the MSHCP, a Habitat Conservation Plan pursuant to Section 10(a)(1)(B) of the Endangered Species Act and a Natural Communities Conservation Plan pursuant to Fish and Game Code Section 2081.1.

Implementation of PVCCSP EIR mitigation measures MM Bio 1 and MM Bio 2, which are consistent with MSHCP requirements, would reduce impacts to nesting birds (including burrowing owls and California horned larks). Further, as with most projects within the MSHCP plan area, an MSHCP Consistency Analysis is required to evaluate project consistency with the goals and requirements of the MSHCP. The BRA and MSHCP Consistency Analysis prepared for this proposed project satisfies that requirement and outlines additional MSHCP requirements that must be met prior to project implementation. The report concluded that the proposed project is unlikely to result in significant impacts on any MSHCP protected species or habitats with the implementation of project-specific mitigation measure MM BIO-2, which requires implementation of MSHCP Best Management Practices (BMPs). Additionally, because the project site is located within the MSHCP Burrowing Owl Survey Area, it is subject to survey requirements for burrowing owl. One of the survey requirements, a burrowing owl habitat assessment, was conducted in support of the BRA and MSHCP Consistency Analysis and its requirement met. The proposed project would be required to conduct additional surveys prior to development of the project site, including breeding season surveys according to MSHCP protocol and CDFW (2012) protocol, as described under project-specific mitigation measure MM BIO-1. Therefore, with implementation of PVCCSP EIR mitigation measures MM Bio 1 and MM Bio 2, and project-specific mitigation measures MM BIO-1 and MM BIO-2, impacts would be less than significant with mitigation.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

The proposed project is required to comply with the following applicable mitigation measures from the PVCCSP EIR.

**MM Bio 1** In order to avoid violation of the MBTA and the California Fish and Game Code, site-preparation activities (removal of trees and vegetation) for all

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Protection. Website:  
[https://library.municode.com/ca/perris/codes/code\\_of\\_ordinances?nodeId=COOR\\_TIT19ZO\\_CH19.71URFOESCA\\_S19.71.050TRPR](https://library.municode.com/ca/perris/codes/code_of_ordinances?nodeId=COOR_TIT19ZO_CH19.71URFOESCA_S19.71.050TRPR).  
Accessed April 27, 2022

PVCC implementing development and infrastructure projects shall be avoided, to the greatest extent possible, during the nesting season (generally February 1 to August 31) of potentially occurring native and migratory bird species.

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

## **MM Bio 2**

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

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

If burrowing owls occupy any implementing project site and cannot be avoided, active or passive relocation shall be used to exclude owls from their

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

## Project-specific Mitigation Measures

The following project-specific measures are required to reduce potential project-related impacts to less than significant levels. These measures provide clarification and expand upon measures required under the PVCCSP and MSHCP.

### **MM BIO-1 Burrowing Owl Breeding Season Surveys**

Breeding season surveys shall be implemented by a qualified Biologist according to Multiple Species Habitat Conservation Plan (MSHCP) protocol and consistent with California Department of Fish and Wildlife (CDFW) 2012 Guidelines. This would consist of a Step II, Part A focused burrow survey, and four Step II, Part B focused burrowing owl surveys conducted during appropriate conditions and times of day. The results of the breeding season surveys shall be reported to the Riverside County Environmental Programs Department and the Regional Conservation Authority (RCA) Monitoring Program Administrator. If the survey is positive for burrowing owls, the project applicant shall implement measures, as needed, as described in PVCCSP EIR mitigation measure MM Bio 2.



## **MM BIO-2      Implement MSHCP Best Management Practices**

Project personnel shall implement the following standard Multiple Species Habitat Conservation Plan (MSHCP) Best Management Practices (BMPs) during the construction phase of the proposed project:

1. A condition shall be placed on grading permits requiring a qualified Biologist to conduct a training session (Worker Environmental Awareness Program [WEAP]) for project personnel prior to grading. The training shall include a description of the species of concern and its habitats, the general provisions of the Endangered Species Act and the MSHCP, the need to adhere to the provisions of the Endangered Species Act and the MSHCP, the penalties associated with violating the provisions of the Endangered Species Act, the general measures that are being implemented to conserve the species of concern as they relate to the proposed project, and the access routes to and project site boundaries within which the proposed project activities must be accomplished.
2. The footprint of disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via pre-existing access routes to the greatest extent possible.
3. The qualified project Biologist shall monitor construction activities for the duration of the proposed project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and species of concern outside the project footprint.
4. The removal of native vegetation shall be avoided and minimized to the maximum extent practicable. Temporary impacts shall be returned to pre-existing contours and revegetated with appropriate native species.
5. Exotic species that prey upon or displace target species of concern should be permanently removed from the site to the extent feasible.
6. To avoid attracting predators of the species of concern, the project site shall be kept as clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site(s).
7. Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed project footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the proposed project and shall be specified in the construction plans. Construction limits shall be fenced with orange snow screen. Exclusion fencing should be maintained until the completion of all construction activities. Employees shall be instructed that their activities are restricted to the construction areas.
8. The City shall have the right to access and inspect the project site to determine its compliance with project approval conditions, including these BMPs.

### **MM BIO-3      Designation of Project Biologists**

Prior to the initiation of ground-disturbing activities during the construction phase of the proposed project, the project applicant shall ensure that project Biologists are designated for the proposed project. The Biologist(s) must be familiar with the biology and conservation of special-status species in the project vicinity, including burrowing owl, and be able to identify the species. The Biologist(s) shall perform pre-construction surveys and monitor construction activities. The Biologist(s) shall be responsible for ensuring that impacts on special-status species, wildlife habitat, or unique resources would be avoided to the fullest extent possible. The Biologist(s) shall ensure that biologically sensitive areas are fenced by the construction contractor around the on-site preservation area and, where appropriate, around other biologically sensitive areas where activities need to be restricted to protect native plants and wildlife or special-status species. These restricted areas would be monitored by the Biologist(s) during ground-disturbing construction activities to ensure their protection during construction. The Biologist(s) shall administer the Worker Environmental Awareness Program (WEAP) to construction personnel and report project minimization activities to the City and the California Department of Fish and Wildlife (CDFW). The project Biologist(s) shall ensure that project minimization measures are implemented prior to, during, and after ground-disturbing construction activities. The Biologist(s) shall have the authority to stop work if work activities threaten a sensitive biological resource.

### **MM BIO-4      Establish Environmentally Sensitive Areas**

Environmentally sensitive areas shall be established around sensitive biological resources on the project site during the construction phase. Long-term environmentally sensitive areas shall be fenced with orange construction fencing that shall remain in place until the end of construction activities. Other environmentally sensitive areas that are temporary in nature, such as a burrow occupied by burrowing owl or an active bird nest or other sensitive species or resource, as necessary, shall be marked with stakes and flagging. Construction personnel shall be instructed not to enter the environmentally sensitive areas and the Biologist(s) shall ensure that site boundaries are maintained and that sensitive resources within them are not disturbed by construction activities.

### **MM BIO-5      Monitoring of Ground-disturbing Construction Activities**

During project construction activities that result in ground disturbance, the project Biologist(s) shall monitor the activities to ensure that sensitive biological resources are protected. The Biologist(s) shall ensure that vegetation clearance activities limit disturbance to the smallest practical area and that construction personnel and activities do not enter environmentally sensitive areas. The Biologist(s) shall perform daily pre-construction sweeps of work areas prior to initiation of daily construction activities. The Biologist(s) shall inspect open trenches, pits, and pipes or other

materials within which a covered species or other sensitive species may become entrapped or hide within. The Biologist(s) shall have the authority to stop work if work activities threaten a sensitive biological resource.

**MM BIO-6 Reporting**

The project Biologist(s) shall provide quarterly and annual reports to the City of Perris Planning Division and the California Department of Fish and Wildlife (CDFW) that detail the implementation of minimization measures. If individuals of a covered species are found on the project site during the construction phase, the Biologist(s) shall submit a species occurrence observation to the CDFW.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.5 Cultural Resources and Tribal Cultural Resources</b>				
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>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>				
d) 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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) 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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

The analysis in this section is based, in part, on the Phase I Cultural Resources Assessment (Phase I CRA) prepared by FCS on April 29, 2022. The Phase I CRA satisfies the requirements in PVCCSP EIR mitigation measure MM Cultural 1 and can be found in Appendix C.

### Setting

This section describes the existing cultural and Tribal Cultural Resources (TCRs) setting and potential effects from the proposed project implementation on the project site and its surrounding area. Descriptions and analysis in this section are also based on information provided by the Native American Heritage Commission (NAHC), Eastern Information Center (EIC), the current inventories of the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historic Landmarks (CHL) list, California Points of Historical Interest (CPHI) list, and the

California Built Environment Resource Directory (BERD). Non-confidential records search results and other correspondence are included in Appendix C.

### **Eastern Information Center Records Search**

On March 22, 2022, a records search for the project site and a 1-mile radius beyond the project boundaries was conducted at the EIC located at University of California, Riverside. The current inventories of the NRHP, the CRHR, the CHL list, the CPHI list, and the California BERD for Riverside County were also reviewed to determine the existence of previously documented local historical resources.

The results of the records search indicate that 29 cultural resources (one prehistoric and 28 historic) have been recorded within 1 mile of the project site, none of which are located within the project boundaries. In addition, 49 area-specific survey reports are on file within a 1-mile radius; two reports (RI-04211 and RI-05444) address the project site and one report (RI-07538) encompasses the project site completely. This indicates that the project site has previously been surveyed for cultural resources. A records search map identifying the proposed project boundaries and 0.5-mile search radius and the relevant non-confidential records search results are included in Appendix C.

### **Native American Heritage Commission**

On February 2, 2022, FCS sent a request to the NAHC in an effort to determine whether any sacred sites are listed on its Sacred Lands File for the project site. A response was received on March 24, 2022, indicating that the Sacred Lands File search was positive for the presence of Native American cultural resources within the project site. The NAHC included a list of 25 tribal representatives available for consultation. To ensure that all Native American knowledge and concerns over potential TCRs that may be affected by implementation of the proposed project are addressed, a letter containing project information and requesting additional information was sent to each tribal representative on March 25, 2022. A response from the Augustine Band of Cahuilla Indians was received on March 30, 2022, indicating that they are unaware of specific cultural resources that may be affected, but to contact the tribal office if any resources are discovered to. No additional responses have been received to date. Correspondence related to the NAHC record searches and tribal representatives can be found in Appendix C.

### **Pedestrian Survey**

On April 8, 2022, FCS Staff Archaeologist Kweku Williams, MA, RPA, conducted a pedestrian survey for unrecorded cultural resources at the project site. The survey covered the subject property where possible, beginning in the southern portion of the project site and moving north, using east–west transects spaced at 15-meter intervals. The project site is an overgrown, semi-desert area with local vegetation scattered throughout the approximately 7.5-acre area. Soil visibility was good in that the topsoil was sandy decomposing granite. The survey area is littered with modern debris due to close proximity to the aforementioned highways.

Survey conditions were documented using digital photographs and field notes. During the survey, Mr. Williams examined all areas of the exposed ground surface for prehistoric artifacts (e.g., fire affected rock, milling tools, flaked stone tools, tool-making debris, ceramics), soil discoloration and

depressions that might indicate the presence of a cultural midden, faunal and human osteological remains, and features indicative of the former presence of structures or buildings (e.g., postholes, standing exterior walls, foundations) or historic debris (e.g., glass, metal, ceramics). All areas of the project site were closely inspected for culturally modified soils or other indicators of potential historic or prehistoric resources. No historic or prehistoric cultural resources or raw materials commonly used in the manufacture of tools (e.g., obsidian, Franciscan chert) were observed. The surface was littered with modern debris and garbage. No prehistoric or historic resources were identified during the survey. Pedestrian survey photos can be found in Appendix C.

### **Cultural Resources and Tribal Cultural Resources**

Would the project:

**a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?**

**No impact.** State CEQA Guidelines Section 15064.5 defines “historical resources” as resources listed in the CRHR or a local register, determined significant by the lead agency, or determined to be eligible by the California Historical Resources Commission for listing in the CRHR. The criteria for eligibility are generally set by the National Historic Preservation Act of 1966, which established the NRHP, and which recognizes properties that are significant at the federal, State, and local levels. To be eligible for listing in the NRHP and CRHR, a district, site, building, structure, or object must possess integrity of location, design, setting, materials, workmanship, feeling, and association relative to American history, architecture, archaeology, engineering, or culture. In addition, unless the property possesses exceptional significance, it must be at least 50 years old to be eligible.

The records search conducted at the EIC determined that there are 28 historic resources recorded within the 1-mile search radius, none of which are located within the project site. In addition, the pedestrian survey failed to identify any historic resources. According to historic aerial photographs, the five permanent buildings on-site were constructed sometime between 1985 and 1997. The buildings are not potentially significant historic resources, as the buildings do not meet the age criterion for historical resources to be listed on the CRHR or NRHP. Therefore, the project site does not contain any buildings, structures, or objects that could potentially qualify as historical resources under CEQA. As such, there would be no impacts to historical resources. No PVCCSP or project-specific mitigation is applicable or required.

**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?**

**Less than significant impact with mitigation incorporated.** Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A project-related significant adverse effect could occur if a project were to affect archaeological resources that fall under either of these categories.

Although the results from the EIC indicate that there are no recorded archaeological resources within the project site; one prehistoric archaeological resource has been recorded within the 1-mile radius of the site. Additionally, the pedestrian survey failed to identify any archaeological resources. Archaeological resources can include but are not limited to stone, bone, wood, or shell artifacts or features, including hearths and structural elements.

However, it is always possible that ground-disturbing activities during construction in this area may uncover previously unknown, buried cultural resources. Therefore, the City of Perris has developed project-specific mitigation measure MM CR-1, a standard mitigation measure to manage unanticipated discoveries of archaeological and Native American resources when monitoring is not required by the Phase 1 cultural resources survey. Project-specific mitigation measure MM CR-1 replaces PVCCSP EIR mitigation measures MM Cultural 2, MM Cultural 3, and MM Cultural 4. Implementation of project-specific mitigation measure MM CR-1 would ensure that potential impacts to archaeological resources are reduced to a less than significant level.

**c) Disturb any human remains, including those interred outside of formal cemeteries?**

**Less than significant impact with mitigation incorporated.** No human remains or cemeteries are known to exist within or near the project site. While it is unlikely that human remains exist within or near the project site, there is always a possibility that subsurface construction activities associated with the proposed project, such as grading or trenching, could potentially damage or destroy previously undiscovered human remains.

In the event of the accidental discovery or recognition of any human remains, State CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Section 5097.98 must be followed. The City of Perris has developed mitigation measure MM CR-2, a standard mitigation measure to manage unanticipated discoveries of human remains. Project-specific mitigation measure MM CR-2 replaces PVCCSP EIR mitigation measure MM Cultural 6. Implementation of project-specific mitigation measure MM CR-2 specifies the procedures to follow in the event human remains are uncovered. Along with compliance with required guidelines and statutes, implementation of project-specific mitigation measure MM CR-2 would reduce potential impacts to human remains to a less than significant level. No further project-specific mitigation is applicable or required.

### **Tribal Cultural Resources**

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:

**d) 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**

**Less than significant impact with mitigation incorporated.** A review of the CRHR, local registers of historical resources and EIC records search results failed to identify any previously listed TCRs,



however, the NAHC results came back positive for TCRs within the project search radius that may be adversely encountered and/or affected by project-related activities. Should any undiscovered TCRs be encountered during project construction, implementation of project-specific mitigation measures MM CR-1 and MM CR-2 would reduce potential impacts to TCRs to a less than significant level. Furthermore, completion of the project-specific Phase I CRA satisfies the requirements in PVCCSP EIR mitigation measure MM Cultural 1. No further project-specific mitigation is applicable or required.

- e) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth 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.**

**Less than significant impact with mitigation incorporated.** FCS conducted tribal outreach with 25 tribal representatives identified by the NAHC. In compliance with Assembly Bill (AB) 52, the City initiated tribal consultation on April 20, 2022, and shall conclude on May 19, 2022. No comments have been received to date. The City, as lead agency, is required to adhere to AB 52. Should any undiscovered TCRs be encountered during project construction, implementation of project-specific mitigation measures MM CR-1 and MM CR-2 would reduce potential impacts to a less than significant level.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

The proposed project has complied with the requirements of PVCCSP EIR mitigation measure MM Cultural 1 through the preparation of the Phase I CRA. The other PVCCSP EIR mitigation measures for Cultural Resources have been replaced with the City's updated mitigation measures identified below as project-specific mitigation measures MM CR-1 and MM CR-2.

### Project-specific Mitigation Measures

**MM CR-1** Prior to the issuance of grading permits, the project proponent/developer shall retain a professional Archaeologist meeting the Secretary of the Interior's Professional Standards for Archaeology (U.S. Department of Interior, 2012; Registered Professional Archaeologist preferred). The primary task of the consulting Archaeologist shall be to monitor the initial ground-disturbing activities at both the subject site and any off-site project-related improvement areas for the 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, including initial vegetation removal, 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 (AB) 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 shall 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 Augustine Band of Cahuilla Indians. A designated Native American representative from either the Soboba Band of Luiseño Indians, the Pechanga Band of Luiseño Indians, or the Augustine Band of Cahuilla 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 shall be given ample time to examine the find. The significance of Native American resources shall be evaluated in accordance with the provisions of State CEQA Guidelines 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 shall work with the City and consulting Archaeologist to protect the resource in accordance with tribal requirements. All analysis shall be undertaken 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, project-specific mitigation measure MM CR-2 shall immediately apply, and all items found in association with Native American human remains shall be considered grave goods or sacred in origin and subject to special handling.

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 shall 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 Code of Federal Regulations [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 shall 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 California Office of Historic Preservation (OHP) 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.

**MM CR-2**

In the event that human remains (or remains that may be human) are discovered at the project site or within the off-site project improvement areas during ground-disturbing activities, the construction contractors, project Archaeologist, and/or designated Luiseño tribal representative shall immediately stop all activities within 100 feet of the find. The project proponent shall then inform the Riverside County Coroner 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 shall notify the Native American Heritage Commission (NAHC), which shall identify the “Most Likely Descendant” (MLD). Despite the affiliation with any Luiseño tribal representative(s) at the project site, the NAHC’s identification of the MLD shall stand. The MLD shall be granted access to inspect the project 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 project site. The disposition of the remains shall 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 shall apply and mediation with the NAHC shall make the applicable determination (see Public Resources Code [PRC] §§ 5097.98(e) and 5097.94(k)).

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

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.6 Energy</b> <i>Would the project:</i>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

The analysis in this section is based, in part, on the Air Quality, Greenhouse Gas Emissions, and Energy Analysis prepared by FCS on June 24, 2022 (revised August 26, 2022). The report can be found in Appendix A.

### Setting

Energy use, especially through fossil fuel consumption and combustion, relates directly to environmental quality since it can adversely affect air quality and generate GHG emissions that contribute to climate change. Electrical power is generated through a variety of sources, including fossil fuel combustion, hydropower, wind, solar, biofuels, and others. Natural gas is widely used to heat buildings, prepare food in restaurants and residences, and fuel vehicles, among other uses. Fuel use for transportation is related to the fuel efficiency of cars, trucks, and public transportation; choice of different travel modes such as auto, carpool, and public transit; and miles traveled by these modes, and generally based on petroleum-based fuels such as diesel and gasoline. EVs may not have any direct emissions but do have indirect emissions via the source of electricity generated to power the vehicle. Construction and routine operation and maintenance of transportation infrastructure also consume energy. SCE provides electricity to the project site vicinity.

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?**

**Less than significant impact.** A discussion of the proposed project’s anticipated energy usage is presented below. Energy use consumed by the proposed project was estimated and includes natural gas, electricity, and fuel consumption for project construction and operation. Energy calculations are included as part of Appendix A.

## Construction Impacts

The proposed project construction schedule was assumed to begin in September 2022 and conclude in June 2023. If the construction schedule moves to later years, construction emissions would likely decrease because of improvements in technology and more stringent regulatory requirements as older, less efficient equipment is replaced by newer and cleaner equipment. The proposed project would require demolition, site preparation, grading, building construction, architectural coating, and paving. The construction phase would require energy for the manufacture and transportation of building materials, preparation of the site (e.g., demolition, site clearing, and grading), and the actual construction of the building. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these tasks.

The types of on-site equipment used during construction of the proposed project could include gasoline- and diesel-powered construction and transportation equipment, including trucks, bulldozers, frontend loaders, forklifts, and cranes. Construction equipment is estimated to consume a total of 35,446 gallons of diesel fuel over the entire construction duration (Appendix A).

Fuel use associated with construction vehicle trips generated by the proposed project was also estimated; trips include construction worker trips, haul truck trips for material transport, and vendor trips for construction material deliveries. Fuel use from these vehicles traveling to the project site was based on (1) the projected number of trips the proposed project would generate during construction, (2) average trip distances by trip type, and (3) fuel efficiencies estimated in the ARB EMFAC mobile source emission model. The specific parameters used to estimate fuel usage are included in Appendix A. In total, the proposed project is estimated to generate 337,627 VMT and a combined 20,755 gallons of combined gasoline and diesel for vehicle travel during construction.

Other equipment could include construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools. Section 7.34.060 of the Perris Municipal Code defines permissible hours of construction as between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday.<sup>31</sup> As on-site construction activities would be restricted to these hours, it is anticipated that the use of construction lighting would be minimal. Singlewide mobile office trailers, which are commonly used in construction staging areas, generally range in size from 160 square feet to 720 square feet. A typical 720-square-foot office trailer would consume approximately 10,391 kilowatt-hours (kWh) during the 10-month construction phase (Appendix A).

The overall construction schedule and process is already designed to be efficient in order to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it. Therefore, the opportunities for future efficiency gains during construction are limited. Therefore, it is anticipated that the construction phase of the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy. Construction-related energy impacts would be less than significant.

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<sup>31</sup> City of Perris. Perris Municipal Code, chapter 7.34. Website:  
[https://library.municode.com/ca/perris/codes/code\\_of\\_ordinances?nodeId=COOR\\_TIT7HEWE\\_CH7.34NOCO\\_S7.34.060CONO](https://library.municode.com/ca/perris/codes/code_of_ordinances?nodeId=COOR_TIT7HEWE_CH7.34NOCO_S7.34.060CONO).  
Accessed June 24, 2022.

## **Operational Impacts**

The proposed project would consume energy as part of building operations and transportation activities. Operation of the proposed project would consume an estimated 825,300 kWh of electricity and an estimated 2,512,296 kilo-British Thermal Unit (kBTU) of natural gas on an annual basis. The proposed project's building would be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the State's Building Energy Efficiency Standards. These are widely regarded as the most advanced building energy efficiency standards and compliance would ensure that building energy consumption would not be wasteful, inefficient, or unnecessary.

Project-related vehicle trips would consume an estimated 262,686 gallons of gasoline and diesel annually and would involve activities and travel routes typical of a warehouse-type project. Thus, transportation fuel consumption would not be wasteful, inefficient, or unnecessary. Impacts would be less than significant.

### **b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?**

**Less than significant impact.** The proposed project would be evaluated with existing State energy standards and with energy conservation policies included in the General Plan.

The proposed project would be served with electricity provided by SCE. In 2020, SCE obtained 30.9 percent of its electricity from renewable energy sources. SCE also offers a Green Rate 50 percent option that sources 65.4 percent of its power mix from eligible renewable energy sources and a Green Rate 100 percent option that sources 100 percent of its power mix from eligible renewable energy sources.<sup>32</sup> The utility would be required to meet the future objective of 60 percent of electricity from renewable energy sources by 2030. The proposed warehouse building would be designed in accordance with Title 24, California's Energy Efficiency Standards for Nonresidential Buildings. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., heating, ventilation, and air conditioning [HVAC] and water heating systems), and indoor and outdoor lighting. The incorporation of the Title 24 standards into the design of the proposed project would ensure that the proposed project would not result in the use of energy in a wasteful manner.

The Perris General Plan contains the following policies related to energy conservation.<sup>33</sup>

**Goal VIII** Sustainable Future: Create a vision for energy and resource conservation and the use of green building design for the City, to protect the environment, improve quality of life, and promote sustainable practices.

**Policy VIII.A** Adopt and maintain development regulations that encourage water and resource conservation.

<sup>32</sup> California Energy Commission (CEC). 2020 Power Content Label. Website: <https://www.energy.ca.gov/filebrowser/download/3902>. Accessed June 24, 2022.

<sup>33</sup> City of Perris. 2016. Climate Action Plan. Website: <https://www.cityofperris.org/Home/ShowDocument?id=12935>. Accessed June 24, 2022.

**Policy VIII.B** Adopt and maintain development regulations that encourage recycling and reduced waste generation by construction projects.

**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).

While several of these policies are voluntary or cannot be implemented by an individual development project, compliance with Title 24 standards and other applicable regulations would ensure that the proposed project would not conflict with any of the General Plan energy conservation policies related to the proposed project’s building, mechanical systems, and indoor and outdoor lighting.

The proposed project would comply with existing State energy standards and with energy conservation policies contained in the General Plan. As such, the proposed project would not conflict with State or local renewable or energy efficiency objectives. Impacts would be less than significant.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

No mitigation required.

### Project-specific Mitigation Measures

No mitigation required.



Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.7 Geology and Soils</b>				
<i>Would the project:</i>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

The analysis in this section is based, in part, on the Geotechnical Investigation prepared by Southern California Geotechnical (SoCalGeo) on December 15, 2021. The Geotechnical Investigation satisfies the requirements of PVCCSP mitigation measure MM Geo 1 and can be found in Appendix D.

Would the project:

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:**
- i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

**No impact.** Based on the requirement to prepare a site-specific geotechnical investigation per PVCCSP EIR mitigation measure MM Geo 1, SoCalGeo prepared the Geotechnical Investigation for the proposed project. The project site is not located within an identified Alquist-Priolo Earthquake Hazard Zone. It should be noted that the preparation of the project-specific Geotechnical Investigation implements and therefore satisfies the requirements of PVCCSP EIR mitigation measure MM Geo 1, which requires the preparation and submittal of a project-specific geotechnical report for review and approval by the City of Perris.

According to the California Department of Conservation Fault Activity Map, the City of Perris does not have any active fault lines that pass through the city limits.<sup>34</sup> The nearest fault to the project site is the Casa Loma Fault, which is located approximately 12.75 miles to the east. Research of available maps indicates that the subject site is not located within an Alquist-Priolo Earthquake Fault Zone. Furthermore, SoCalGeo did not identify any evidence of faulting during the geotechnical investigation. Therefore, the possibility of significant fault rupture on the site is considered to be low. Thus, the project site is not identified within an Alquist-Priolo Earthquake Fault Zone, and there would be no impacts. No further PVCCSP or project-specific mitigation is applicable or required.

- ii) **Strong seismic ground shaking?**

**Less than significant impact.** Seismic ground shaking is influenced by the proximity of the site to an earthquake fault, the intensity of the seismic event, and the underlying soil composition beneath the property. As discussed above, the nearest fault in proximity to the project site is located approximately 12.75 miles to the east. The 2019 California Building Standards Code (CBC) provides procedures for earthquake resistant structural design that include considerations for on-site soil conditions, occupancy, and the configuration of the structure including the structural system and height. Project design and construction would be required to comply with applicable General Plan policies and provisions of the CBC, which would further reduce risks associated with strong seismic ground shaking if an earthquake were to occur. Given the distance of the proposed project to a fault line and compliance with the CBC, impacts would be less than significant. No further PVCCSP or project-specific mitigation is applicable or required.

<sup>34</sup> California Department of Conservation. 2010. Fault Activity Map of California. Website: <http://maps.conservation.ca.gov/cgs/fam/>. Accessed April 04, 2022.

**iii) Seismic-related ground failure, including liquefaction?**

**Less than significant impact.** Liquefaction is a mode of ground failure that results from the generation of high-water pressures during earthquake ground shaking, causing loss of shear strength. Liquefaction is typically a hazard where loose sandy soils exist below groundwater. The California Geologic Survey has designated certain areas within Southern California as potential liquefaction hazard zones. These are areas considered at a risk of liquefaction-related ground failure during a seismic event, based upon mapped surficial deposits and the presence of a relatively shallow water table.

According to the California Governor’s Office of Emergency Services, MyHazards Map, and the project-specific Geotechnical Investigation, the project site is not located within a liquefaction zone.<sup>35</sup> Furthermore, the potential for liquefaction on the project site is considered low because groundwater was not identified within 25 feet of the ground surface, and the subsurface conditions encountered at the boring locations are not considered to be conducive to liquefaction. The Geotechnical Investigation determined that liquefaction is not considered to be a design concern for the proposed project. Therefore, impacts related to soil liquefaction would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

**iv) Landslides?**

**No impact.** The project site is relatively flat and is not located in an area near any steep slopes. According to the United States Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS) Web Soil Survey, the project site is located on slopes ranging from zero to 2 percent.<sup>36</sup> According to Figure S-7 of the City of Perris General Plan Safety Element (2021), the project site is not located in an area susceptible to seismically induced landslides. Figure S-7 indicates that the nearest areas susceptible to seismically induced landslides are located over 3 miles south of the project site.<sup>37</sup> As such, impacts would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

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

**Less than significant impact.** The project site is currently used for storage of a variety of materials and currently contains five permanent buildings. A wood-framed commercial building and a residential building are present on the southeast portion of the project site. Two connected metal structures are present on the central portion of the project site, and a shed-type structure is present on the southwest portion of the project site. The proposed project consists of the construction of a 165,371-square-foot warehouse. Most of the near-surface soils possess appreciable silt and clay content and would become unstable if exposed to significant moisture infiltration or disturbance by construction traffic. In addition, based on their granular content, some of the on-site soils may be

<sup>35</sup> California Governor’s Office of Emergency Services. 2022. MyHazards Map. Website:

<https://myhazards.caloes.ca.gov/?msclkid=c7c0ceebd14811ecac16ab2219ba740f>. Accessed May 11, 2022.

<sup>36</sup> United States Department of Agriculture. 2022. Natural Resource Conservation Service Web Soil Survey. Website:

<https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>. Accessed May 11, 2022.

<sup>37</sup> City of Perris. 2021. General Plan Safety Element. Website:

<https://www.cityofperris.org/home/showpublisheddocument/15024/637807110903270000>. Accessed May 26, 2022.

susceptible to erosion. Therefore, the site should be graded to prevent ponding of surface water and to prevent water from running into excavations.<sup>38</sup> The recommended remedial grading would remove all the undocumented fill soils and a portion of the near-surface native alluvium, including collapsible/compressible soils, and replace these soils as compacted structural fill. The native soils that would remain in place below the recommended depth of over excavation would not be subject to significant load increases from the foundations of the new structure. Provided that the recommended remedial grading is completed, the post-construction static settlements of the proposed structure are expected to be within tolerable limits. Any grading at the project site would be completed in accordance with local and State building codes to prevent substantial soil erosion. Therefore, with the implementation of typical construction best practices conducted in accordance with local and State laws, impacts would be less than significant with regard to the potential for soil erosion and the loss of topsoil. No PVCCSP or project-specific mitigation is applicable or required.

- c) **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**

**Less than significant impact with mitigation incorporated.** The following analysis is based on information from the project-specific Geotechnical Investigation which satisfies applicable PVCCSP mitigation measure MM Geo 1.

**Landslide:** The project site is not located within a designated area where previous occurrence of landslide movement, or local topographic, geological, geotechnical, and subsurface water conditions have occurred. The project site is flat and is not in the vicinity of slopes that would be susceptible to landslides.

**Lateral Spreading:** As discussed in the response to liquefaction (see above) the site is not located in an identified liquefaction hazard area, is relatively flat, and is not in the vicinity of slopes that would be susceptible to liquefaction (e.g., slope areas that have sufficient height, slope ratio, and underlying geologic conditions that can result in liquefaction). Furthermore, the Geotechnical Investigation determined that the potential for lateral spreading, to affect the site is considered to be low.

**Subsidence:** Minor ground subsidence may occur in the soils below the area of removal and re-compaction of existing fill soils and near-surface alluvium would occur due to settlement and machinery working. However, the Geotechnical Investigation determined that the potential for subsidence is considered to be low. Therefore, impacts associated with subsidence would be less than significant with the incorporation of standard engineering design requirements.

**Liquefaction or Collapse:** The Geotechnical Investigation indicates that the project site is not located within a zone of liquefaction susceptibility. Furthermore, according to the project-specific Geotechnical Investigation, the potential for liquefaction on the project site is considered low because groundwater was not identified within 50 feet of the surface, and the soils on the project site would not be susceptible to liquefaction. Additionally, the subsurface conditions encountered at

<sup>38</sup> Southern California Geotechnical (SoCalGeo). Geotechnical Investigation Proposed Warehouse. April 4, 2022.

the boring locations are not considered to be conducive to liquefaction. These conditions consist of moderate to high strength older alluvium and no evidence of a long-term groundwater table within the depths explored by the borings. Based on these considerations, liquefaction is not considered to be a design concern for this project site.

The project-specific Geotechnical Investigation indicates that artificial fill soils underlying the project site consist primarily of clayey sand and silty sand. These near-surface soils are considered loose, potentially compressible, and are not suitable for support of shallow foundations or concrete slabs in the current condition. The Geotechnical Investigation recommends that the artificial fill be over-excavated to a depth of at least 4 feet below existing grade and to a depth of at least 3 feet below proposed pad grade, evaluated by a geotechnical engineer, scarified to a depth of 12 inches, moisture conditioned, and recompacted. Construction-related recommendations for earthwork and grading would be required prior to and during construction and are included as project-specific mitigation measure MM GEO-1. Implementation of project-specific mitigation measure MM GEO-1 would ensure that the loose soils on the project site are properly compacted before the construction of the proposed warehouse building. Therefore, project impacts related to unstable soil would be less than significant with the implementation of project-specific mitigation measure MM GEO-1.

**d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

**Less than significant impact with mitigation incorporated.** The near-surface soils generally consist of silty sands, clayey sands, and occasional sandy clays, which have a very low expansion potential; therefore, no design considerations related to expansive soils are considered warranted for this site. However, the project-specific Geotechnical Investigation recommends that additional expansion index testing be conducted during subsequent geotechnical investigation and at the completion of rough grading to verify the expansion potential of the as-graded building pad, as included in the project-specific mitigation measure MM GEO-1. Therefore, impacts related to expansive soils would be less than significant with mitigation incorporated.

**e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

**Less than significant impact.** The project site would eventually connect to municipal sewer infrastructure and served by public sanitary sewer located in Ramona Expressway area; however, it is anticipated that sewer service would not be available until after the occupancy of the building. Therefore, the proposed project would include a temporary septic field at the southeast corner of the project site as an interim measure. This system would remain in use until the public sewer is available, at which point the system would be decommissioned. Therefore, impacts would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

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

**Less than significant impact with mitigation incorporated.** A significant adverse effect could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features that presently exist within the project site.

The project site is located in an urbanized area and has been previously disturbed by past development activities. The proposed project would require excavation for foundation work. According to the paleontological records search conducted for the project, the surface of the project site and surrounding half-mile search area consists solely of Holocene alluvium (Qa), which is too young to be fossiliferous. No older deposits are within a mile of the project site, so it is doubtful that any are in its shallow subsurface.

The records search focused solely on the Pleistocene of Riverside County to see if any significant paleontological resources have been recorded in the Perris area, and results were found to be negative. Neither a paleontological survey of the site prior to construction or paleontological monitoring during earth-disturbing construction-related activities was recommended due to the surficial Holocene deposits and the unlikelihood that older, potentially fossiliferous deposits could be encountered in the subsurface. However, there is still the possibility that paleontological resources could be discovered during construction activities.

The City of Perris has developed mitigation measure MM GEO-2, a standard mitigation measure to manage unanticipated discoveries of paleontological resources. Project-specific mitigation measure MM GEO-2 replaces PVCCSP EIR mitigation measure MM Cultural 5. Impacts related to the destruction of a unique paleontological resource or site, or unique geologic feature would be less than significant with mitigation.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

Project-specific mitigation measure MM GEO-2 replaces PVCCSP EIR mitigation measure MM Cultural 5.

### Project-specific Mitigation Measures

**MM GEO-1 Implementation of Geotechnical Investigation Recommendations During Construction**

The proposed project shall adhere to all recommendations and geotechnical design considerations outlined in the project-specific Geotechnical Investigation related to settlement expansion, soluble sulfates, corrosion potential, shrinkage/subsidence, and grading and foundation plan review.

**MM GEO-2** 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 3 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 the off-site project improvement areas until the Paleontologist has been approved by the City.

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

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

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

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.8 Greenhouse Gas Emissions</b> <i>Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

The analysis in this section is based, in part, on the Air Quality, Greenhouse Gas Emissions, and Energy Report prepared by FCS on June 24, 2022 (revised August 26, 2022). The report can be found in Appendix A.

### Setting

For GHG emissions and global warming, there is not, at this time, one established, universally agreed-upon “threshold of significance” by which to measure an impact. While the CARB published draft thresholds in 2008, they were never adopted, and the CARB recommended that local air districts and lead agencies adopt their own thresholds for GHG impacts.

The City of Perris and the project site is located within the SoCAB, which is under the jurisdiction of the SCAQMD. In 2008, the SCAQMD formed a working group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the air basin. The working group developed several different options that are contained in the SCAQMD Draft Guidance Document—Interim CEQA GHG Significance Threshold (Interim GHG Thresholds) that could be applied by lead agencies. The SCAQMD Board has adopted the 10,000 metric tons of carbon dioxide equivalent (MT CO<sub>2</sub>e) interim screening threshold for new stationary/industrial sources for which the SCAQMD is the lead agency but has not approved the thresholds or other uses. In 2010, the SCAQMD Tier 3 threshold was expanded to include industrial projects, as explained in the minutes from the most recent working group meeting.<sup>39</sup> However, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current draft thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.

<sup>39</sup> South Coast Air Quality Management District (SCAQMD). 2010. Greenhouse Gas CEQA Threshold Stakeholder Working Group Meeting #15. September 28. Website: [www.aqmd.gov/ceqa/handbook/GHG/2010/sept28mtg/ghgmtg15-web.pdf](http://www.aqmd.gov/ceqa/handbook/GHG/2010/sept28mtg/ghgmtg15-web.pdf). Accessed June 24, 2022.



- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. 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:
  - Industrial projects: 10,000 MT CO<sub>2</sub>e per year for all lead agencies
  - All non-industrial land use types: 3,000 MT CO<sub>2</sub>e per year
  - or
  - Based on land use type: residential: 3,500 MT CO<sub>2</sub>e per year; commercial: 1,400 MT CO<sub>2</sub>e per year; or mixed use: 3,000 MT CO<sub>2</sub>e per year
- Tier 4 has the following options:
  - Option 1: Reduce business-as-usual (BAU) emissions by a certain percentage; this percentage is currently undefined.
  - Option 2: Early implementation of applicable AB 32 Scoping Plan measures
  - Option 3: 2020 target for service population (SP), which includes residents and employees: 4.8 MTCO<sub>2</sub>e/SP/year for projects and 6.6 MT CO<sub>2</sub>e/SP/year for plans
  - Option 3, 2035 target: 3.0 MT CO<sub>2</sub>e/SP/year for projects and 4.1 MT CO<sub>2</sub>e/SP/year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

The thresholds identified above have not been adopted by the SCAQMD or distributed for widespread public review and comment, and the working group tasked with developing the thresholds has not met since September 2010. The future schedule and likelihood of threshold adoption is uncertain.

In the absence of other thresholds of significance promulgated by the SCAQMD, the City of Perris has been using the SCAQMD's 10,000 MT CO<sub>2</sub>e per year threshold for industrial projects and the draft thresholds for non-industrial projects the purpose of evaluating the GHG impacts associated with proposed general development projects. As stated above, SCAQMD staff were proposing to recommend the 10,000 MT CO<sub>2</sub>e per year threshold for industrial uses by all lead agencies. The City's use of the 10,000 MT CO<sub>2</sub>e per year threshold is also considered to be conservative since it is being applied to all of the GHG emissions generated by the proposed industrial projects (i.e., area sources, energy sources, vehicular sources, solid waste sources, and water sources) whereas the SCAQMD's 10,000 MT CO<sub>2</sub>e per year threshold applies only to the new stationary sources generated at industrial facilities.

The proposed project's generation of GHG emissions are compared to the SCAQMD interim screening threshold of 10,000 MT CO<sub>2</sub>e annually for new industrial uses in order to determine the significance for Impact 2.8(a). The significance of Impact 2.8(b) is determined based on the compliance with applicable GHG reduction plans. Assessing the proposed project's consistency with adopted plans to reduce GHG emissions is a methodology consistent with potential solutions offer

by the Court in the Newhall Ranch ruling (compliance with Consideration No. 3 regarding compliance with GHG reduction plans or Climate Action Plans [CAPs]).

Would the project:

- a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**Less than significant impact.** GHG emissions associated with development of the proposed project would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust and worker and vendor trips. There would also be long-term operational emissions associated with vehicular traffic within the project vicinity, energy and water usage, and solid waste disposal.

**Construction Emissions**

The proposed project would generate GHG emissions during construction activities, resulting from emission sources such as construction equipment, haul trucks, and construction worker vehicles. Although these emissions would be temporary and short-term in nature, they could represent a substantial contribution of GHG emissions. Construction emissions were modeled using CalEEMod Version 2022.1. Table 9, below, shows the annual construction GHG emissions.

**Table 9: Proposed Project Construction GHG Emissions**

Construction Activity	Total GHG Emissions (MT CO <sub>2</sub> e per year)
Main Site Demolition 2022	77
Main Site Preparation 2022	53
Main Site Grading 2022	29
Main Site Building Construction 2022	85
Main Site Building Construction 2023	293
Main Site Paving 2023	16
Main Site Architectural Coating 2023	3
Frontage Site Preparation 2022	10
Frontage Grading 2022	25
Frontage Paving 2022	11
Frontage Architectural Coating 2022	1
Frontage Architectural Coating 2023	0.17
<b>Total Construction Emissions</b>	<b>603</b>
<b>Emissions Amortized Over 30 Years<sup>1</sup></b>	<b>20</b>
Notes: GHG = greenhouse gas MT CO <sub>2</sub> e = metric tons carbon dioxide equivalent	

Construction Activity	Total GHG Emissions (MT CO <sub>2</sub> e per year)
Totals may not appear to sum exactly due to rounding. <sup>1</sup> Construction GHG emissions are amortized over the 30-year lifetime of the project. Source: Appendix A.	

As shown above, the proposed project would generate approximately 603 MT CO<sub>2</sub>e during construction. Since SCAQMD has not established a construction GHG threshold, total construction emissions were amortized over 30 years and included in the emissions inventory to account for the short-term, one-time GHG emissions from the construction phase of the proposed project.

### Operational Emissions

Operational or long-term emissions occur over the life of the project. Project operations were modeled for the 2023 operational year, immediately following the completion of construction. Sources for operational emissions are summarized below and are described in more detail in the Air Quality, Greenhouse Gas Emissions, and Energy Report prepared for the proposed project (see Appendix A). Sources for operational GHG emissions include:

- Motor Vehicles:** These emissions refer to GHG emissions contained in the exhaust from the cars and trucks that would travel to and from the project site. Based on the Traffic Memorandum, the proposed project would generate 184 passenger car trips and 102 truck trips per day.
- Natural Gas:** These emissions refer to the GHG emissions that occur when natural gas is burned on the project site. Natural gas uses could include heating water, space heating, dryers, stoves, or other uses.
- Indirect Electricity:** These emissions refer to those generated by off-site power plants to supply electricity required for the project.
- Area Sources:** These emissions refer to those produced during activities such as landscape maintenance.
- Water Transport:** These emissions refer to those generated by the electricity required to transport and treat the water to be used on the project site.
- Waste:** These emissions refer to the GHG emissions produced by decomposing waste generated by the project.
- Stationary Sources:** Based on the information provided by the project applicant, a diesel fire pump is included as part of fire control. These emissions refer to the testing of the fire pump based on regulations.
- Refrigerants:** During operation, there may be leakages of refrigerants (hydrofluorocarbons) from air conditioners and any refrigeration systems. These emissions refer to the CO<sub>2</sub>e of the leaked refrigerants.

Table 10 presents the estimated annual GHG emissions from the proposed project’s operational activities. As shown in Table 10, the proposed project would generate approximately 4,804 MT CO<sub>2</sub>e per year after the inclusion of 20 MT CO<sub>2</sub>e per year from project construction.

**Table 10: Operational Greenhouse Gas Emissions (Unmitigated)**

GHG Emissions Source	GHG Emissions (MT CO <sub>2</sub> e per year)
Mobile	3,608
Area	3
Energy	334
Water	94
Waste	35
Refrigerant	708
Stationary	2
Amortized Construction	20
<b>Total Annual Project Emissions</b>	<b>4,804</b>
<b>SCAQMD Threshold</b>	<b>10,000</b>
<b>Exceed SCAQMD Threshold ?</b>	<b>No</b>
Notes: GHG = greenhouse gas MT CO <sub>2</sub> e = metric tons carbon dioxide equivalent SCAQMD = South Coast Air Quality Management District Source: Appendix A.	

As shown in Table 10, the proposed project’s operational GHG emissions would not exceed the SCAQMD threshold. Therefore, the potential impacts associated the generation of GHG emissions would be less than significant and no project-specific mitigation measures would be required.

**b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

**Less than significant impact with mitigation incorporated.**

This impact is addressed by assessing the proposed project’s consistency with the ARB’s adopted 2017 Scoping Plan Update and the City of Perris’ adopted CAP. This would be achieved with an assessment of the proposed project’s compliance with applicable Scoping Plan measures and CAP measures as addressed below.

*Senate Bill 32 2017 Scoping Plan Update*

The 2017 Climate Change Scoping Plan Update addressing the Senate Bill (SB) 32 targets was adopted on December 14, 2017. Table 11 provides an analysis of the project’s consistency with the

2017 Scoping Plan Update measures. As shown in Table 11, many of the measures are not applicable to the proposed project, while the proposed project is consistent with strategies that are applicable.

**Table 11: Consistency with SB 32 2017 Scoping Plan Update**

2017 Scoping Plan Update Reduction Measure	Project Consistency
<p><b>SB 350 50 percent Renewable Mandate.</b> Utilities subject to the legislation will be required to increase their renewable energy mix from 33 percent in 2020 to 50 percent in 2030.</p>	<p><b>Not applicable.</b> This measure would apply to utilities and not to individual development projects. The proposed project would purchase electricity from a utility subject to the SB 350 Renewable Mandate.</p>
<p><b>SB 350 Double Building Energy Efficiency by 2030.</b> This is equivalent to a 20 percent reduction from 2014 building energy usage compared to current projected 2030 levels.</p>	<p><b>Not applicable.</b> This measure applies to existing buildings. The proposed project would not utilize existing buildings. New structures are required to comply with Title 24 Energy Efficiency Standards that are expected to increase in stringency over time. The proposed project would comply with the applicable Title 24 Energy Efficiency Standards in effect at the time building permits are received.</p>
<p><b>Low Carbon Fuel Standard.</b> This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.</p>	<p><b>Not applicable.</b> This is a Statewide measure that cannot be implemented by a project applicant or lead agency. However, vehicles accessing the project site would benefit from the standards.</p>
<p><b>Mobile Source Strategy (Cleaner Technology and Fuels Scenario).</b> Vehicle manufacturers will be required to meet existing regulations mandated by the LEV III and Heavy-Duty Vehicle programs. The strategy includes a goal of having 4.2 million Zero-Emission Vehicles (ZEVs) on the road by 2030 and increasing numbers of ZEV trucks and buses.</p>	<p><b>Consistent with Mitigation.</b> The proposed project is industrial in nature and would support truck and freight operations. It is expected that deliveries throughout the State would be made with an increasing number of ZEV delivery trucks, including trips that would be coming to and from the project site. The proposed project plan sets do not include EV charging infrastructure, which could prevent ZEV trucks from delivering goods to the site when operational. As a result, the proposed project could conflict with the Scoping Plan’s Mobile Source Strategy, which would be a potentially significant impact. However, MM GHG-1 through MM GHG-3 would require the proposed project to install EV infrastructure and include infrastructure to operate zero and near-zero freight vehicles and equipment powered by renewable energy.</p>
<p><b>Sustainable Freight Action Plan</b> The plan’s target is to improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030. This would be achieved by deploying over 100,000 freight vehicles and equipment capable of zero-emission operation and maximize near zero-emission freight vehicles and equipment powered by renewable energy by 2030.</p>	<p><b>Consistent with Mitigation.</b> This measure applies to owners and operators of trucks and freight operations. The proposed project is industrial in nature and would support truck and freight operations. The proposed project plan sets do not include EV charging infrastructure, which could prevent ZEV trucks from delivering goods to the site when operational. In addition, the proposed project does not include zero-emission on-site operational equipment, such as forklifts or pallet jacks. The use of diesel-powered equipment would emit GHGs and potentially conflict</p>

2017 Scoping Plan Update Reduction Measure	Project Consistency
	with the Sustainable Freight Action Plan Target to improve efficiency by 25 percent. As a result, the proposed project could result in a potentially significant impact. However, MM GHG-1 through MM GHG-3 would require the project to install EV infrastructure and include infrastructure to operate zero and near-zero freight vehicles and equipment powered by renewable energy.
<p><b>Short-Lived Climate Pollutant (SLCP) Reduction Strategy.</b> The strategy requires the reduction of SLCPs by 40 percent from 2013 levels by 2030 and the reduction of black carbon by 50 percent from 2013 levels by 2030.</p>	<p><b>Consistent.</b> The proposed project would not include major sources of black carbon. This measure revolves around ARB’s SLCP Reduction Strategy that was released in April 2016 as a result of SB 650. SB 650 required the State to develop a strategy to reduce emissions of SLCPs. DPM reductions have come from strong efforts to reduce on-road vehicle emissions. Car and truck engines used to be the largest sources of anthropogenic black carbon emissions in California, but the State’s existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years. These policies are based on existing technologies.</p>
<p><b>SB 375 Sustainable Communities Strategies.</b> Requires Regional Transportation Plans to include a sustainable communities strategy for reduction of per capita vehicle miles traveled.</p>	<p><b>Not applicable.</b> The proposed project does not include the development of a Regional Transportation Plan.</p>
<p><b>Post-2020 Cap-and-Trade Program.</b> The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.</p>	<p><b>Not applicable.</b> The proposed project is not one targeted by the cap-and-trade system regulations, and, therefore, this measure does not apply to the project. However, the post-2020 Cap-and-Trade Program indirectly affects people and entities who use the products and services produced by the regulated industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers.</p>
<p><b>Natural and Working Lands Action Plan.</b> The ARB is working in coordination with several other agencies at the federal, State, and local levels, stakeholders, and with the public, to develop measures as outlined in the Scoping Plan Update and the governor’s Executive Order B-30-15 to reduce GHG emissions and to cultivate net carbon sequestration potential for California’s natural and working land.</p>	<p><b>Not Applicable.</b> The project site is in a built-up urban area next to existing light industrial uses and a highway and would not be considered natural or working lands.</p>
<p>Source: California Air Resources Board (ARB). 2017. California’s 2017 Climate Change Scoping Plan. November. Website: <a href="https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf">https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf</a>. Accessed June 3, 2022.</p>	

As discussed in Table 11, the proposed project could potentially conflict with the Scoping Plans goals contained in the Mobile Source Strategy and Sustainable Freight Action Plan, because it currently does not include EV charging infrastructure or the use and support of zero-emission on-site operational equipment infrastructure. As a result, MM GHG-1 through MM GHG-3 would be necessary to ensure the proposed project supports the use of zero-emission freight vehicles and on-site operational equipment.

Therefore, the proposed project would not conflict with any applicable 2017 Scoping Plan Update reduction measures after the incorporations of MM GHG-1 through MM GHG-3.

*Consistency with Perris Climate Action Plan*

The City of Perris adopted a CAP in February 2016 for the development and implementation of policies and programs to reduce GHG emissions within the City.<sup>40</sup> The following strategies are presented in the City’s CAP and the proposed project’s consistency with the CAP is discussed below.

**Table 12: Consistency with Perris Climate Action Plan**

Perris CAP Measures	Project Consistency
<b>E1:</b> Energy Action Plan. Improve municipal and community-wide energy efficiency and reduce energy consumption through the adoption of local Energy Action Plans (EAPs).	<b>Consistent.</b> The proposed project would comply with the most recent Title 24 requirements, which are considered the most state-of-the-art energy efficiency codes in California. Compliance with Title 24 requirements would ensure compliance with the local EAP.
<b>T-1:</b> Bicycle Infrastructure Improvements. Expand on-street and off-street bicycle infrastructure, including bicycle lanes and bicycle trails.	<b>Consistent.</b> The proposed project would be required to comply with AB 1109. As described in the Project Description, the proposed project would provide a Class I multiuse trail along the proposed project frontage and landscaped parkway in accordance with the City of Perris, County of Riverside, and California Department of Transportation (Caltrans) standards.
<b>T-2:</b> Bicycle Parking. Provide additional options for bicycle parking.	<b>Consistent.</b> The proposed project would comply with City Municipal Code standards for bicycle parking.
<b>T-3:</b> End of Trip Facilities. Encourage use of non-motorized transportation modes by providing appropriate facilities and amenities for commuters.	<b>Consistent.</b> The proposed project would comply with City Municipal Code standards for bicycle parking.
<b>T-4:</b> Transit Frequency Expansion. Collaborate with local and regional transit providers to provide more frequent transit in the subregion.	<b>Not applicable.</b> This measure would be the responsibility of the City of Perris and the proposed project would not collaborate with local and regional transit providers.
<b>T-7:</b> Mixed-Use Development. Provide for a variety of development types and uses.	<b>Not applicable.</b> The proposed project would be light industrial and would be consistent with existing zoning designations. As this measure is only relevant to mixed-

<sup>40</sup> City of Perris. 2016. Climate Action Plan. Website: <https://www.cityofperris.org/Home/ShowDocument?id=12935>. Accessed June 24, 2022.



Perris CAP Measures	Project Consistency
	use development projects, the measure would not be applicable.
<b>T-8:</b> Design/Site Planning. Design neighborhoods and sites to reduce VMT.	<b>Consistent.</b> The proposed project site plan and design would be reviewed by the City of Perris prior to issuance of construction permits, which would ensure VMT is considered in site design.
<b>T-10:</b> Limit Parking Requirements for New Development. Reduce requirements of vehicle parking in new development projects.	<b>Consistent.</b> The proposed project would comply with City Municipal Code standards for parking.
<b>T-11:</b> Voluntary Transportation Demand Management. Reduce demand for roadway travel through incentives for alternative modes of transportation and disincentives for driving.	<b>Consistent.</b> The proposed project would comply as needed by the City.
<b>SW-2:</b> Food Scrap and Compostable Paper Diversion. Divert food and paper waste from landfills by implementing collection system.	<b>Consistent.</b> The proposed project would comply with City Municipal Code standards for waste disposal.

In summary, the proposed project is consistent with applicable strategies and would not conflict with the recommendations and reduction measures outlined in the 2017 Scoping Plan addressing the SB 32 targets after incorporation of mitigation. Furthermore, the proposed project would be consistent with the applicable measures listed in the City’s CAP. Considering this information, the proposed project would not conflict with any applicable plan, policy, or regulation of an agency adopted to reduce the emissions of GHGs. Therefore, the impact would be less than significant with incorporation of MM GHG-1 through MM GHG-3.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

No mitigation required.

### Project-specific Mitigation Measures

#### MM GHG-1 Incorporation of Electric Vehicle Charging Stations

The proposed project shall incorporate a minimum of 8 percent of all vehicle parking spaces (including those for trucks) with electric vehicle (EV) charging stations, consistent with the applicable California Green Building Standards Code Tier 1 Nonresidential Voluntary Measure (Section A5.106.5.3.1). EV charging spaces must provide EV charging infrastructure to support future installation of EV supply equipment and shall meet the design space requirements of California Green Building Standards Code Section 5.106.5.3.2.



**MM GHG-2      Support of Electric Powered Interior Vehicles**

All buildings shall be designed to provide infrastructure to support use of electric powered forklifts and/or other interior vehicles.

**MM GHG-3      Provision of Electric Infrastructure**

All buildings shall be designed to provide electric infrastructure to support use of exterior yard trucks and on-site vehicles. The operation of yard trucks that are used to move trailers and on-site vehicles within the project site shall be powered by electricity unless the project applicant can reasonably demonstrate that specific equipment is not available for a particular task.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.9 Hazards and Hazardous Materials</b>				
<i>Would the project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

The analysis in this section is based, in part, on the Phase I Environmental Site Assessment (Phase I ESA) prepared by Hazard Management Consulting, Inc. (HMC) on December 9, 2021. The Phase I ESA can be found in Appendix E.

The Phase I ESA concluded that there were no Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), Historical Recognized Environmental Conditions (HRECs) and/or environmental issues found as part of the assessment. While not an REC per the American Society for Testing and Materials (ASTM) definition; however, given the age of the

buildings, the Phase I ESA concluded that there is a moderate likelihood that asbestos containing materials are present on-site. Thus, the Phase I ESA recommends that a survey be conducted of all structures on the project site prior to any activity that could disturb potential asbestos containing materials.

Would the project:

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

**Less than significant impact.** The proposed project could result in a significant hazard to the public if the project includes the routine transport, use, or disposal of hazardous materials or places housing near a facility that routinely transports, uses, or disposes of hazardous materials.

### **Construction**

During typical construction operations, the routine use of fuels, oils, greases, solvents, and other similar hazardous materials would be required. However, these materials would be contained within vehicles, or would be stored in adequate containers to ensure releases to the environment do not occur. Furthermore, based on the limited term of construction, the small quantities of these substances, and the presence of regulatory oversight, the potential for releases to the environment is minimal. No disposal of hazardous materials on the project site is expected to occur. Additionally, hazardous substances utilized for the construction phase of this development would be maintained in compliance with local and State regulations. If a release were to occur, compliance with these local regulations would ensure impacts to the environment remain less than significant.

### **Operation**

The proposed project consists of the construction of a warehouse building. Aside from the temporary construction period, which would require the use of limited quantities of potentially hazardous substances related to construction activities, the proposed project is not expected to include the routine transport, use, or disposal of hazardous materials. As such, impacts would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

- 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?**

**Less than significant impact with mitigation incorporated.** The project site is currently used for storage of a variety of materials and currently contains five vacant permanent buildings. A wood-framed commercial building and a residential building are present on the southeast portion of the project site. Two connected metal structures are present on the central portion of the project site, and a shed-type structure is present on the southwest portion of the project site.<sup>41</sup> Infrastructure associated with the storage of materials, including concrete foundation pads, equipment shelving, and shipping containers are present throughout the southern portion of the site. The northern portion of the site includes a former storage area for pallets that was recently cleared and now

<sup>41</sup> Hazard Management Consulting, Inc. (HMC). Phase I Environmental Site Assessment. Ramona Expressway and Brennan Avenue.

supports ruderal vegetation. At the time of the Phase I ESA site reconnaissance was conducted, the project site was being used for illegal use of cannabis cultivation and a mobile home was illegally parked on-site on the southeast portion. Since the time of the Phase I ESA and preparation of this document, the mobile home has been removed and illegal cannabis cultivation has ceased. Furthermore, all the buildings remain vacant with no active operations existing on the project site. The Phase I ESA further noted that the exterior open area portion of the project site is unpaved dirt. Miscellaneous debris, storage containers, metal rods and other non-hazardous items are present on the yard areas. The Phase I ESA concluded that there were no RECs, CRECs, HRECs, and no significant environmental issues were identified during the site reconnaissance. However, there is a moderate likelihood that asbestos containing materials are present on-site due to the age of the buildings. With the implementation of project-specific mitigation measure MM HAZ-1, which requires a full asbestos survey, impacts would be less than significant. The project applicant shall adhere to all abatement, remediation, and clearance sampling requirements should any asbestos be found in the on-site buildings. Therefore, impacts would be less than significant.

**c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**Less than significant impact.** The project site is not located within 0.25 mile of any current or proposed school. The closest school, Val Verde High School, is located approximately 0.3 mile southwest of the project site along Morgan Street, and Edgemont Elementary School is approximately 7.23 miles to the north of the project site. Because of the proximity of Val Verde High School within 0.25-mile radius, PVCCSP EIR mitigation measure MM Haz 1, requiring preparation of a project-specific environmental analysis, is applicable to the proposed project. Thus, in accordance with PVCCSP EIR mitigation measure MM Haz 1, this document provides project-level analysis. Furthermore, the proposed project does not include the use of acutely hazardous materials during construction or operations apart from automotive related substances such as gasoline, diesel fuel, grease, oils, lubricants, coolants, etc. As such, impacts with regard to the production or use of hazardous substances would be less than significant. No further PVCCSP or project-specific mitigation is applicable or required.

**d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

**No impact.** According to the project Phase I ESA, no RECs or environmental issues are present on the project site. Additionally, the project site was not identified within the California State GeoTracker database or the Hazardous Waste and Substances Sites List (CORTESE).<sup>42</sup> While it is possible that typical agricultural chemicals were stored on-site during past uses, no specific areas of concern related to the use of chemicals on-site have been identified. Furthermore, it is likely that residual chemicals (if any) have significantly degraded since the site's last use for agricultural purposes. Therefore, because the project site is not identified as an environmentally hazardous site pursuant to

<sup>42</sup> California State Water Resources Control Board (State Water Board). Geotracker Active Map Coverages. Website: <http://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Ramona+and+Perris+Blvd>. Accessed April 15, 2022

Government Code Section 65962.5, no impacts would occur. No PVCCSP or project-specific mitigation is applicable or required.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

**Less than significant impact.** The project site is located approximately 1.5 miles to the south of MARB/IPA and approximately 5.51 miles north of Perris Valley Airport. However, the proposed project is located within Zone C1 (Primary Approach/Departure Zone). This zone encompasses most of the projected 60 dB CNEL contour plus immediately adjoining areas. Accident potential risks are moderate in that aircraft fly at low altitudes over or near the zone. Exposure to noise in this area is greater (above 60 dB CNEL), however, the accident potential risks at this distance from the runway are reduced by the altitude at which aircraft typically fly over the area. Single-event noise levels are potentially disruptive in this zone.<sup>43</sup>

The PVCCSP Airport Overlay Zone section includes Table 12.0-1, MARB/IPA Basic Compatibility Criteria Table, which sets forth specific policies and restrictions for each airport overlay zone. The proposed project would be consistent with the applicable compatibility criteria applicable to Zone C1, as described in Table 13, Proposed Project Consistency with Zone C1 (Primary Approach/Departure Zone).

**Table 13: Proposed Project Consistency With Zone C1 (Primary Approach/Departure Zone)**

C1 Zone Compatibility Criteria	Proposed Project Consistency with Applicable Criteria
Development shall contain less than or equal to 3.0 residential dwelling units per acre.	<b>Consistent:</b> The proposed project would not include residential dwelling units.
Development shall contain no more than 100 people per acre on average or 250 people for a single acre for all other land uses.	<b>Consistent:</b> The proposed project would utilize approximately 68 full-time employees. Employees would work in two shifts within a 24-hour period. Therefore, it would not exceed 100 people.
Development shall not include structures taller than 70 feet to provide adequate airspace.	<b>Consistent:</b> The proposed project would be consistent with the Light Industrial zone and would comply with the maximum structure height limit of 50 feet. Therefore, it would not exceed 70 feet.
Prohibited uses include children’s schools, daycare centers, libraries, hospitals, congregate care facilities, places of assembly, and noise-sensitive outdoor nonresidential uses.	<b>Consistent:</b> The proposed project would result in the operation of a warehouse building. The proposed project would not contain any of the listed prohibited uses.
Uses that pose hazards to flight are prohibited. <sup>1</sup>	<b>Consistent:</b> The proposed project would result in the operation of a warehouse building. The proposed project would not include physical, visual, and electronic forms of interference with the safety of aircraft operations.

<sup>43</sup> City of Perris. 2022. Perris Valley Commerce Center Airport Overlay Zone, Figure 12.0-1, MARB/IPA Airport Compatibility Map. Website: <https://www.cityofperris.org/home/showpublisheddocument/2647/637799977032200000>. Accessed April 12, 2022.

C1 Zone Compatibility Criteria	Proposed Project Consistency with Applicable Criteria
Discourages uses include critical community infrastructure facilities <sup>2</sup> and above ground bulk storage of hazardous materials.	<b>Consistent:</b> The proposed project would result in the operation of a warehouse building. The proposed project would not include any critical community infrastructure and above ground storage of hazardous materials.
Sound attenuation as necessary to meet interior noise level criteria for noise-sensitive uses to no more than CNEL 40 dB.	<b>Consistent:</b> The proposed project would result in the operation of a warehouse building and is not considered a noise-sensitive use. Further, the standard building construction is presumed to provide adequate sound attenuation where the difference between the exterior noise exposure and the interior standard is 20 dB or less.
All development containing electromagnetic radiation components shall notify March ARB and ensure there is no conflict with Air Base radio communications.	<b>Consistent:</b> The proposed project would result in the operation of a warehouse building and would not contain any electromagnetic radiation components.
As part of certain real estate transactions involving residential property within any compatibility zone, information regarding airport proximity and the existence of aircraft overflights must be disclosed.	<b>Consistent:</b> The proposed project would comply with State law regarding real estate disclosure.
<p>Notes:</p> <p><sup>1</sup> Hazards to flight include physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations. Land use development that may cause the attraction of birds to increase is also prohibited. Man-made features must be designed to avoid heightened attraction of birds.</p> <p><sup>2</sup> Critical community facilities include power plants, electrical substations, and public communications facilities.</p> <p>Source: Perris Valley Commerce Center Airport Amendment 12 Overlay Zone, Table 12.0-1, MARB/IPA Basic Compatibility Criteria Table.</p>	

In addition, implementation of PVCCSP EIR mitigation measures MM Haz 2 through PVCCSP MM Haz 6, which are applicable to the proposed project, would ensure that the aviation easement is conveyed to MARB/IPA, control the outdoor lighting spillage, conduct proper disclosure, as well as ensure proper design features to promote aviation safety. Thus, impacts would be less than significant. No further project-specific mitigation is applicable or required.

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

**Less than significant impact.** According to the City of Perris Emergency Operations Plan (EOP), dated May 2013, hazardous substances are commonly transported and utilized throughout the City of Perris. The City of Perris has also developed a Local Hazard Mitigation Plan in June of 2017, which contains guidance on emergency response procedures in case of a release of hazardous substances occurs.<sup>44</sup> The proposed project consists of the construction of a warehouse building. The proposed project does not include any characteristics that would physically impair or otherwise interfere with

<sup>44</sup> City of Perris. 2013. Emergency Operations Plan (EOP). Website: <https://www.cityofperris.org/home/showdocument?id=362>  
Accessed April 5, 2022.

the EOP or evacuation in the project vicinity. As such, impacts would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

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

**Less than significant impact.** According to CAL FIRE’s Fire and Resource Assessment Program, Very High Fire Hazard Severity Zones in the Local Responsibility Area (LRA) as recommended by CAL FIRE, the project site is not identified as an area subject to a fire hazard.<sup>45</sup> As such, the proposed project would not result, directly or indirectly, in a significant risk of wildfire and there would be no impacts.

However, according to the General Plan EIR, the California Fire Alliance has identified the City as a “Community at Risk” from wildfires. A numerical estimate of the level of risk of “3” has been assigned to portions of the City. This represents the highest level of risk. To address the risk of wildfire, the City of Perris has implemented weed abatement and brush clearance regulations. These include a 30-foot brush clearance radius for all structures within the City, and a 150-foot brush clearance requirement for structures on hillsides, primarily located in the westerly and southwesterly portions of the City. The proposed project would comply with these requirements. As such, the proposed project would not result, exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires and impacts would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

The proposed project is required to comply with the following applicable mitigation measures from the PVCCSP EIR.

**MM Haz 1** Prior to the recordation of a final map, issuance of a building permit, or conveyance to an entity exempt from the Subdivision Map Act, whichever occurs first, any proposed industrial uses located within one-quarter mile of Val Verde High School (located at 972 Morgan Street, between Nevada Road and Webster Avenue, Perris, CA) or any other existing or proposed school shall perform project-level CEQA review to determine the potential for project-specific impacts associated with hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste.

**MM Haz 2** Prior to the recordation of a final map, issuance of a building permit, or conveyance to an entity exempt from the Subdivision Map Act, whichever occurs first, the landowner shall convey an aviation easement to the MARB/March Inland Port Airport Authority.

<sup>45</sup> California Department of Forestry and Fire Protection (CAL FIRE). 2022. Fire Hazard Severity Zone Viewer in LRA Map. Website: <http://egis.fire.ca.gov/FHSZ/>. Accessed April 6, 2022.

**MM Haz 3** Any outdoor lighting installed shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane.

**MM Haz 4** The following notice shall be provided to all potential purchasers and tenants:

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

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

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

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

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

Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation. All retention and water quality basins shall be designed to dewater within 48 hours of a rainfall event.

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



project applicant and the Perris Planning Division will work with FAA to resolve any adverse effects on aeronautical operations.

### **Project-specific Mitigation Measures**

**MM HAZ-1** Prior to any activity that could disturb potential asbestos containing materials, an asbestos survey shall be conducted of all structures on-site.

Should any asbestos containing materials be found, the project applicant shall adhere to all recommendations included in the report for remediation of such materials.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.10 Hydrology and Water Quality</b>				
<i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

The analysis in this section is based, in part, on the Preliminary Water Quality Management Plan (WQMP) and Preliminary Hydrology Study prepared by DRC Engineering, Inc. on March 14 and March 15, 2022, respectively. These reports can be found in Appendix F.

The Preliminary Hydrology Study concluded that the flow rate as a result of the proposed project increase 0.47 percent from the existing flow rate. Therefore, it is determined that the proposed stormwater detention is not required to mitigate the design storm peak flow since the difference between existing and proposed peak flow is negligible. Per the proposed unit hydrograph results for

the 100-year 24-hour storm event prepared for the Preliminary Hydrology Study, stormwater would fill the proposed detention basin at approximately 390 minutes, prior to the hydrograph peak discharge. Therefore, without a detention analysis it can be assumed that the proposed detention basin would not attenuate the proposed hydrograph peak flow. Therefore, the proposed development would improve storm drain facilities and maintain existing downstream drainage patterns.

Would the project:

a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

**Less than significant impact.** The proposed project consists of the construction of a warehouse and associated improvements on an approximately 7.5-acre site.

Project-related impacts related to water quality could occur over four different periods:

- During demolition of existing uses when risk of pollution exposure is present;
- During the earthwork and construction phase, when the potential for erosion, siltation, and sedimentation would be the greatest;
- Following construction, before the establishment of ground cover, when the erosion potential may remain relatively high; and
- After project completion, when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would remain similar to existing conditions.

### **National Pollutant Discharge Elimination System**

Under Section 402 of the Clean Water Act, the EPA has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct stormwater discharges from construction activities disturbing 1 acre or more of land. In California, the California State Water Resources Control Board (State Water Board) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The State Water Board works in coordination with the Regional Water Quality Control Boards (RWQCBs) to preserve, protect, enhance, and restore water quality. The City of Perris is located within the jurisdiction of the Santa Ana RWQCB.

### **Short-term Construction**

Dischargers whose projects disturb 1 or more acres of soil (or whose projects disturb less than 1 acre but are part of a larger common plan of development that in total disturbs 1 or more acres), are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original

line, grade, or capacity of the facility. To obtain coverage for discharges under the General Construction Permit, dischargers are required to electronically file the Permit Registration Documents, which include a Notice of Intent (NOI), Storm Water Pollution Prevention Plan (SWPPP), and other compliance-related documents required by the General Permit and mail the appropriate permit fee to the State Water Board.

The proposed project would disturb approximately 7.5 acres of land. Project construction activities would be subject to compliance with NPDES requirements, which include obtaining coverage under the General Construction Permit by filing the Permit Registration Documents (an NOI and SWPPP, among others), as well as the pertinent provisions of the City of Perris Development Code. Compliance with the NPDES requirements would ensure that the project's construction-related impacts to water quality would be less than significant.

### Long-term Operations

The Municipal Storm Water Permitting Program regulates stormwater discharges from Municipal Separate Storm Sewer Systems (MS4s). Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. The MS4 permits require the discharger to develop and implement a Storm Water Management Plan/Program with the goal of reducing the discharge of pollutants to the maximum extent practicable. Maximum Extent Practicable is the performance standard specified in Section 402(p) of the Clean Water Act. The management programs specify what BMPs would be used to address certain program areas. The program areas include public education and outreach; illicit discharge detection and elimination; construction and post-construction; and good housekeeping for municipal operations.

The Riverside County Flood Control District, the County of Riverside, and the City of Perris discharge pollutants from their MS4s. Stormwater and non-stormwater enter and are conveyed through the MS4s and are discharged to surface water bodies of the Riverside County Region. Discharges from Riverside County's Phase I MS4s are regulated through the Riverside County MS4 Permit (Order No. R8-2010-0033 NPDES No. CAS618033, as amended by Order No. R8-2013-0024) pursuant to Section 402(p) of the Federal Clean Water Act.

The MS4 permit requires the development and implementation of a program addressing stormwater pollution issues in development planning for private projects; the City of Perris has adopted the Chapter 14.22, Stormwater/Urban Runoff Management and Discharge Control Ordinance 1194, of the City of Perris Municipal Code to address pollutants in stormwater discharge. A WQMP by DRC Engineering, Inc. was prepared for the proposed project dated March 14, 2022, and included within Appendix F.<sup>46</sup> The aforementioned WQMP would reduce discharge of pollutants into urban runoff from the proposed project by managing site runoff volumes and flow rates through application of

<sup>46</sup> City of Perris. 2006. An Ordinance of the City Council of the City of Perris, California, Revising Perris Municipal Code Chapter 14.22 Relating to Stormwater Management and Discharge Controls. Website: <https://www.cityofperris.org/home/showpublisheddocument/3143/637250528044770000#:~:text=ORDINANCE%20NUMBER%201194%20AN%20ORDINANCE%20OF%20THE%20CITY,WHEREAS%20enacting%20an%20ordinance%20establishing%20stormwater%20and%20urban%20runoff?msclid=efd366a5d15b11ec8524fa6c10487d71>. Accessed May 11, 2022.

and use of structural source control, nonstructural source control, and biotreatment control BMPs after the construction phase of the proposed project.

As such, compliance with these local, State, and federal policies and regulations, including adherence to the project-specific WQMP, would ensure that short-term and long-term project-related impacts to water quality would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

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

**Less than significant impact.** The City's stormwater collection system includes catch basins, drainage basins, pumping stations, and force mains. The proposed project would install curb and gutter improvements, four catch basins, underground piping, and an underground detention system under the northern portion of the project site. The proposed project would also install a modular wetland treatment device at the northeast corner of the project site. Stormwater runoff from the building roof would be captured via roof drains/downspouts and conveyed underground to connect to the overall drainage system. Runoff from the roof, detention system, and treatment device would be discharged into the existing public storm drain system at the curb face along Brennan Avenue.

Additionally, underground pipe structures would be installed to replace the open channel on the north side of the proposed project frontage and would connect to the existing storm drain along Ramona Expressway.

Furthermore, the proposed project would not deplete groundwater supplies nor substantially interfere with groundwater recharge such that there would be a new deficit in aquifer volume or a lowering of the local groundwater table level, as it would comply with the conditions set forth by the NPDES, and would include catch basins and a modular wetland treatment device within the site, which would allow for groundwater recharge. As such, project implementation would therefore result in a less than significant impact on groundwater supplies. No PVCCSP or project-specific mitigation is applicable or required.

**c) Substantially alter the existing drainage pattern of 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;**

**Less than significant impact.** As stated above, the City's stormwater collection system includes catch basins, drainage basins, pumping stations, and force mains. Project construction activities such as excavation soil stockpiling, grading, paving, utility system installation, landscaping activities could result in loose sediment, which can be picked up by surface water or wind into nearby storm drains and into waterways. As discussed in Impact 2.10(a), the project's construction activities would be subject to compliance with NPDES requirements, which include obtaining coverage under the General Construction Permit by filing the Permit Registration Documents (an NOI and SWPPP, among others), as well as the pertinent provisions of the City of Perris Development Code. The SWPPP

would identify erosion control and sediment control BMPs that would meet or exceed measures required by the General Construction Permit to control potential construction-related pollutants. The proposed project would also be required to adhere to the BMPs outlined in the project-specific WQMP. Furthermore, the proposed catch basins and wetland treatment device on-site would reduce the potential for loose sediment to travel off-site into downstream waterways. Adherence to BMPs and implementation of on-site treatment facilities would reduce impacts to erosion or siltation on- or off-site. Therefore, impacts would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

- (ii) **substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**

**Less than significant impact.** As discussed above, the Preliminary Hydrology Report was prepared for the proposed project by DRC Engineering, Inc. The report determined that the proposed flow rate would increase by 0.47 percent compared to the existing flow are of the site. This peak flow increase is considered negligible, and detention for hydrologic mitigation is not required. The proposed project would improve storm drain facilities and maintain existing downstream drainage patterns and include catch basins and a wetland treatment device on-site which would reduce any flooding. Therefore, the proposed project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Therefore, impacts would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

- (iii) **create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;  
or**

**Less than significant impact.** As mentioned above, the proposed project would result in a negligible increase in peak flow compared to existing flow on-site. The proposed project would be served by existing City of Perris stormwater drainage systems near the project site. The proposed project would install four catch basins, underground piping, and an underground detention system at the northern portion of the site, and a wetland treatment device. These proposed catch basins, detention system, and treatment device would reduce the likelihood of pollutants to be carried off-site. Stormwater runoff from the building roof and treatment device would be discharged into the existing public storm drain system. All improvements to the site would connect to existing storm drains. Furthermore, the proposed project would implement BMPs which would further reduce impacts related to the introduction of pollutants resulting from construction of the project. Therefore, impacts would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

- (iv) **impede or redirect flood flows?**

**Less than significant impact.** The proposed project includes the construction of a warehouse, associated paved parking areas, and landscaped areas. While the proposed project would increase impervious surfaces on-site compared to existing conditions, the proposed project would install four catch basins, underground piping, and an underground detention system beneath the northern

portion of the site. Furthermore, the proposed project would also install a modular wetland treatment device at the northeast corner of the site. These features would reduce the potential for flooding on- or off-site. Furthermore, in accordance with the WQMP developed for the proposed project, multiple BMPs would be incorporated into the project design in order to minimize the potential for flooding. Specific BMPs would include the construction of underground detention system under the northern portion of the project site, as described above, as well as landscaped areas which would allow for adequate infiltration of stormwater runoff. Therefore, impacts related impeding or redirecting flood flows would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

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

**Less than significant impact.** According to the Federal Emergency Management Agency (FEMA) Flood Map Service Center, the project site is within Zone X, an area of minimal flood hazard.<sup>47</sup> There are no bodies of water located in the immediate vicinity of the site. The proposed project is located approximately 5.48 miles west of the Perris Reservoir and approximately 79 miles away from the ocean as such the proposed project would not be subject to seiche or tsunami hazards because it is located inland and far away from any enclosed and semi-enclosed water body. According to Figure S-4 of the City of Perris General Plan Safety Element (2021), the project site is not located within the dam inundation zone for Perris Dam. Based on the distance of the project from these bodies of water, the proposed project would not be at risk for release of pollutants due to project inundation. No PVCCSP or project-specific mitigation is applicable or required.

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

**Less than significant impact.** According to the California Department of Water Resources and the EMWD, the City of Perris is located within the West San Jacinto Groundwater Management Area.<sup>48</sup> No groundwater extraction or utilization is included as a part of the proposed project. As such, the proposed project would not interfere with the implementation of any adopted water quality control plan. Furthermore, as discussed above, the proposed project would include catch basins and a modular wetland treatment device within the site, which would ensure runoff from the property would be controlled and directed to the municipal stormwater control systems or percolate into the groundwater basin for recharge. Therefore, based on the implementation of the BMPs discussed above, the incorporation of project-specific design features including water quality control basins, and project compliance with the MS4 and NPDES permit requirements, the proposed project impacts would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

<sup>47</sup> Federal Emergency Management Agency (FEMA). 2021. Flood Map Service Center. Website: <https://msc.fema.gov/portal/search?AddressQuery=ramona%20expressway%20and%20brennan%20avenue%20perris%20ca#searchresultsanchor>. Accessed April 5, 2022.

<sup>48</sup> Eastern Municipal Water District (EMWD). 2020. West San Jacinto Groundwater Management Area 2020 Annual Report. Website: [https://www.emwd.org/sites/main/files/file-attachments/west\\_san\\_jacinto\\_2018\\_annual\\_report\\_-\\_final.pdf?1633969734](https://www.emwd.org/sites/main/files/file-attachments/west_san_jacinto_2018_annual_report_-_final.pdf?1633969734). Accessed April 7, 2022.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

No mitigation required.

### Project-specific Mitigation Measures

No mitigation required.



Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.11 Land Use and Planning</b>				
<i>Would the project:</i>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

### Setting

The project site is located within the PVCCSP area and is designated as LI. According to the City’s Zoning Map, the site is zoned as LI. This zone provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials, and retail related to manufacturing. The Light Industrial zone has a building intensity of 0.75 FAR and a maximum structure height limit of 50 feet.

Would the project:

**a) Physically divide an established community?**

**No impact.** The physical division of an established community is defined as any development that creates a linear feature or removal of a mean of access that would impact mobility within in an existing community or between the community and the surrounding area. The project site is currently used for storage for a variety of materials and currently contains five vacant permanent buildings. The proposed project would develop a warehouse that would not include any features that remove access or impact mobility. Furthermore, no streets or sidewalks would be permanently closed as a result of the development of the proposed project. In fact, construction of a new sidewalk and multipurpose trail along the northern boundary (Ramona Expressway) and sidewalk along the eastern boundary (Brennan Avenue) of the project site. Local access to the site would be provided via one 40-foot driveway along Brennan Avenue and one 35-foot driveway along Ramona Expressway. According to the PVCCSP and City’s Zoning Map, the project site and surrounding area are zoned for Light Industrial development. No features of the proposed project would physically divide an established community. As such, no impacts would occur. No PVCCSP or project-specific mitigation is applicable or required.

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

**Less than significant impact.** As discussed above, the proposed project involves the development of a warehouse center on a site zoned for light industrial development, according to the PVCCSP and City Zoning Map. The proposed project is consistent with these designations. The light industrial zone provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials, and retail related to manufacturing. The light industrial zone has a building intensity of 0.75 FAR and a maximum structure height limit of 50 feet. The overall project design would adhere to the design standards articulated within the PVCCSP and approved by the City. As such, the proposed project is consistent with this zoning designation and its requirements.

The proposed project was reviewed for consistency with all applicable policies within the City of Perris General Plan 2030 and would comply with all applicable General Plan 2030 requirements as further discussed in each topical area within this document and further detailed in Table 14, below.

**Table 14: General Plan Consistency**

General Plan Policy	Project Consistency
<b>Land Use Element</b>	
<b>Policy II.A:</b> Require new development to pay its full, fair share of infrastructure costs.	<b>Consistent:</b> The proposed project would install utilities to tie into existing infrastructure. The proposed project would pay its fair share of infrastructure costs related to existing utilities in the City of Perris. Additionally, the proposed project would pay transportation mitigation impact fees in accordance with Perris Ordinance No. 1352.
<b>Policy II.B:</b> Require new development to include school facilities or pay school impact fees, where appropriate.	<b>Consistent:</b> The proposed project would pay the appropriate school impact fees.
<b>Policy III.A:</b> Accommodate diversity in the local economy.	<b>Consistent:</b> Because of the nature of the proposed project, the proposed project would accommodate diversity in land use type within the local economy through the development of an industrial building.
<b>Policy V.A:</b> Restrict development in areas at risk of damage due to disasters.	<b>Consistent:</b> The project site is not located within an area classified as a fire hazard zone, nor is it located in a flood hazard zone.
<b>Circulation Element</b>	
<b>Policy I.B:</b> Support development of a variety of transportation options for major employment and activity centers including direct access to commuter facilities, primary arterial highways, bikeways, park-n-ride facilities, and pedestrian facilities.	<b>Consistent:</b> The proposed project would increase pedestrian and bicycle connectivity and accessibility by providing for a multipurpose trail, landscaped parkway, and streetlights in accordance with the City, County of Riverside, and Caltrans standards.

General Plan Policy	Project Consistency
<p><b>Policy II.B:</b> Maintain the existing transportation network while providing for future expansion and improvement based on travel demand, and the development of alternative travel modes.</p>	<p><b>Consistent:</b> The proposed project would increase pedestrian and bicycle connectivity and accessibility through the provision of a multipurpose trail, landscaped parkway, and streetlights in accordance with the City, County of Riverside, and Caltrans standards.</p>
<p><b>Policy III.A:</b> Implement a transportation system that accommodates and is integrated with new and existing development and is consistent with financing capabilities.</p>	<p><b>Consistent:</b> The proposed project would implement the recommendations of the project-specific Transportation Impact Analysis, which includes connectivity to traffic patterns and truck routes to existing and planned new projects. Furthermore, the proposed project specifications for construction of driveways and installation of improvements along Ramona Expressway and Brennan Avenue. Furthermore, the proposed project would comply with applicable PVCCSP mitigation measures related to traffic, including the payment of fair share mitigation fees.</p>
<p><b>Policy V.A:</b> Provide for safe movement of goods along the street and highway system.</p>	<p><b>Consistent:</b> The proposed project would result in a less than significant impact to the transportation system and would not conflict with roadway safety or result in hazards.</p>
<p><b>Policy VII.A:</b> Implement the Transportation System in a manner consistent with federal, State, and local environmental quality standards and regulations.</p>	<p><b>Consistent:</b> The proposed project would comply with all federal, State, and local requirements related to transportation, as outlined in the Traffic Impact Analysis prepared for the proposed project (Appendix I).</p>
<p><b>Conservation Element</b></p>	
<p><b>Policy II.A:</b> Comply with State and federal regulations to ensure protection and preservation of significant biological resources.</p>	<p><b>Consistent:</b> The proposed project would be required to comply with all applicable State and federal regulations related to the protection and preservation of significant biological resources. In addition, an MSHCP Consistency Analysis was completed for the proposed project (Appendix B). The conclusion of the analysis is that the proposed project would not result in any significant impacts to biological resources.</p>
<p><b>Policy III.A:</b> 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.</p>	<p><b>Consistent:</b> An MSHCP Consistency Analysis was completed for the proposed project (Appendix B). The conclusion of the analysis is that the proposed project would not have significant impacts on any Western Riverside (WR)-MSHCP protected species or habitats. Furthermore, the proposed project would comply with the Standard BMPs of the WR-MSHCP (Volume I, Appendix C) and would implement project-specific mitigation measure MM BIO-1.</p>

General Plan Policy	Project Consistency
<p><b>Policy IV.A:</b> Comply with State and federal regulations and ensure preservation of the significant historical, archaeological and paleontological resources.</p>	<p><b>Consistent:</b> The proposed project would be required to comply with all applicable State and federal regulations related to the protection and preservation of significant historical, archaeological, and paleontological resources. In addition, a Cultural Resources Analysis (Appendix C) was prepared for the proposed project, the conclusion of which is that the proposed project would not result in any significant impacts to historical or archaeological resources with the implementation of the applicable PVCCSP City’s standard mitigation measures to reduce impacts related to cultural resources.</p>
<p><b>Policy V.A:</b> Coordinate land-planning efforts with local water purveyors.</p>	<p><b>Consistent:</b> The project developer is coordinating with the local water purveyor, the EMWD, to ensure proper and adequate connections to existing utilities.</p>
<p><b>Policy VI.A:</b> Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).</p>	<p><b>Consistent:</b> Because the proposed project would disturb more than 1 acre of land, the proposed project must comply with the NPDES, including obtaining coverage under the General Construction Permit. Furthermore, the proposed project must comply with the requirements for pollutant reduction outlined in the project-specific Preliminary Water Quality Management Plan (WQMP) (Appendix F) .</p>
<p><b>Policy VIII.A:</b> Adopt and maintain development regulations that encourage water and resource conservation.</p>	<p><b>Consistent:</b> The proposed project would comply with the City of Perris Development Code regulations related to landscape water use efficiency measures and tree planting requirements to maximize energy and water conservation.</p>
<p><b>Policy VIII.B:</b> Adopt and maintain development regulations that encourage recycling and reduced waste generation by construction projects.</p>	<p><b>Consistent:</b> The proposed project would comply with all applicable regulations related to recycling and waste reduction.</p>
<p><b>Noise Element</b></p>	
<p><b>Policy I.A:</b> The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development.</p>	<p><b>Consistent:</b> The project site is located approximately 1.5 miles to the south of March Air ARB/IP and approximately 5.51 miles north of Perris Valley Airport. The proposed project is located within the PVCCSP Airport Overlay Zone, located specifically in Zone C1 (Primary Approach/Departure zone). However, the proposed project would comply with the Compatibility Criteria Table for the Airport Overlay Zone in the PVCCSP.</p>
<p><b>Policy V.A:</b> New large scale commercial or industrial facilities located within 160 feet of sensitive land uses shall mitigate noise impacts to attain an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria.</p>	<p><b>Consistent:</b> The proposed project is not located within 160 feet of sensitive land uses. The proposed project would comply with applicable PVCCSP mitigation measures to reduce impacts related to noise. In addition, the proposed project would not result in a substantial permanent increase in ambient noise above existing noise levels near the nearest sensitive receptor immediately east of the project site.</p>

General Plan Policy	Project Consistency
<b>Safety Element</b>	
<p><b>Policy S-2.1:</b> Require road upgrades as part of new developments/major remodels to ensure adequate evacuation and emergency vehicle access. Limit improvements for existing building sites to property frontages.</p>	<p><b>Consistent:</b> The proposed project has connections to roadways via one 40-foot driveway along Brennan Avenue and one 35-foot driveway along Ramona Expressway. A 26-foot-wide fire lane is proposed to the north, west, and south of the warehouse, and would provide emergency and fire truck access.</p>
<p><b>Policy S-2.2:</b> Require new development or major remodels to include backbone infrastructure master plans substantially consistent with the provisions of “Infrastructure Concept Plans” in the Land Use Element.</p>	<p><b>Consistent:</b> The proposed project would include infrastructure that would tie into existing infrastructure for sewer, stormwater, and fire. Until the main sewer lines are constructed, a temporary septic field would be installed in the southeast portion of the project site. Furthermore, the proposed project would comply with the City of Perris Development Code and consult with the City of Perris Building and Public Works Departments to ensure adequate capacity and future demands.</p>
<p><b>Policy S-2.5:</b> Require all new developments, redevelopments, and major remodels to provide adequate ingress/egress, including at least two points of access for sites, neighborhoods, and/or subdivisions.</p>	<p><b>Consistent:</b> The proposed project would provide two points of access via one 40-foot driveway along Brennan Avenue and one 35-foot driveway along Ramona Expressway.</p>
<p><b>Policy S-4.3:</b> Require new development projects and major remodels to control stormwater runoff on-site.</p>	<p><b>Consistent:</b> The proposed project would include curb and gutter improvements, four catch basins, underground piping, and an underground detention system under the northern portion of the project site. The proposed project would also include a modular wetland treatment device at the northeast corner of the project site. Stormwater runoff from the building roof would be captured via roof drains/downspouts and conveyed underground to connect to the overall drainage system. Runoff from the roof, detention system, and treatment device would be discharged into the existing public storm drain system at the curb face along Brennan Avenue.</p>
<p><b>Policy S-4.4:</b> Require flood mitigation plans for all proposed projects in the 100-year floodplain (Flood Zone A and Flood Zone AE).</p>	<p><b>Consistent:</b> The proposed project is not located in a flood hazard zone. According to FEMA, the proposed project is located in an area of minimal flood hazard.</p>
<p><b>Policy S-5.3:</b> Promote new development and redevelopment in areas of the City outside the Very High Fire Hazard Severity Zone and allow for the transfer of development right into lower-risk areas, if feasible.</p>	<p><b>Consistent:</b> The project site does not lie within an area classified as a fire hazard zone.</p>
<p><b>Policy S-5.6:</b> All developments throughout the City Zones are required to provide adequate circulation capacity, including connections to at least two roadways for evacuation.</p>	<p><b>Consistent:</b> The proposed project has connections to roadways via one 40-foot driveway along Brennan Avenue and one 35-foot driveway along Ramona Expressway. A 26-foot-wide fire lane is proposed to the north, west, and south of the warehouse, and</p>

General Plan Policy	Project Consistency
	would provide emergency and fire truck access. The proposed project does not include any characteristics that would physically impair or otherwise interfere with the Emergency Operation Plan or evacuation in the project vicinity.
<p><b>Policy S-5.10:</b> Ensure that existing and new development have adequate water supplies and conveyance capacity to meet daily demands and firefighting requirements.</p>	<p><b>Consistent:</b> The EMWD, which would serve the proposed project, would have sufficient supplies to meet retail and wholesale demands from 2020 to 2045 under average year, normal year, single dry year, and multiple dry year conditions.</p>
<p><b>Policy S-6.1:</b> Ensure new development and redevelopments comply with the development requirements of the AICUZ Land Use Compatibility Guidelines and ALUCP Airport Influence Area for March Air Reserve Base.</p>	<p><b>Consistent:</b> The project site is located approximately 1.5 miles to the south of MARB/IPA and approximately 5.51 miles north of Perris Valley Airport. The proposed project is located within the PVCCSP Airport Overlay Zone, located specifically in Zone C1 (Primary Approach/Departure zone). However, the proposed project would comply with the Compatibility Criteria Table for the Airport Overlay Zone in the PVCCSP.</p>
<p><b>Policy S-6.2:</b> Effectively coordinate with March Air Reserve Base, Perris Valley Airport, and the March Inland Port Airport Authority on development within its influence areas.</p>	<p><b>Consistent:</b> The proposed project is within Zone C1 of the PVCCSP Airport Overlay Zone, and the proposed project would be consistent with the applicable compatibility criteria. The proposed project would implement PVCCSP EIR mitigation measures MM Haz 2 through PVCCSP MM Haz 6, which would ensure that the aviation easement is conveyed to MARB/IPA, control the outdoor lighting spillage, conduct proper disclosure, as well as ensure proper design features to promote aviation safety. The proposed project would continue to coordinate with MARB/IPA and the Perris Valley Airport.</p>
<p><b>Policy S-6.3:</b> Effectively coordinate with March Air Reserve Base and Perris Valley Airport on development within its influence areas.</p>	<p><b>Consistent:</b> The proposed project is within Zone C1 of the PVCCSP Airport Overlay Zone, and the proposed project would be consistent with the applicable compatibility criteria. The proposed project would implement PVCCSP EIR mitigation measures MM Haz 2 through PVCCSP MM Haz 6, which would ensure that the aviation easement is conveyed to MARB/IPA, control the outdoor lighting spillage, conduct proper disclosure, as well as ensure proper design features to promote aviation safety. The proposed project would continue to coordinate with MARB/IPA and the Perris Valley Airport.</p>
<p><b>Policy S-7.1:</b> All development will be required to include adequate protection from damage due to seismic incidents.</p>	<p><b>Consistent:</b> The proposed project would comply with the provisions of the CBC and applicable General Plan policies to reduce seismic impacts. In addition, the proposed project would implement all recommendations of the Geotechnical Investigation prepared for the proposed project (Appendix D).</p>

General Plan Policy	Project Consistency
<p><b>Policy S-7.2:</b> Require geological and geotechnical investigations by State-licensed professionals in areas with potential for seismic and geologic hazards as part of the environmental and developmental review process.</p>	<p><b>Consistent:</b> A Geotechnical Investigation was prepared by SoCalGeo for the proposed project, satisfying the requirement of PVCCSP mitigation measure MM Geo 1. The Geotechnical Investigation can be found in Appendix D.</p>
<p><b>Healthy Community Element</b></p>	
<p><b>Policy HC 1.3:</b> Improve safety and the perception of safety by requiring adequate lighting, street visibility, and defensible space.</p>	<p><b>Consistent:</b> The proposed project would include adequate lighting throughout the site that would be properly shielded and directed for on- site safety and security.</p>
<p><b>Policy HC 6.3:</b> Promote measures that will be effective in reducing emissions during construction activities</p> <ul style="list-style-type: none"> <li>● Perris will ensure that construction activities follow existing South Coast Air Quality Management District (SCAQMD) rules and regulations.</li> <li>● 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.</li> <li>● 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.</li> </ul>	<p><b>Consistent:</b> The proposed project would comply with all applicable SCAQMD rules and regulations, as outlined in the Air Quality and Greenhouse Gas Emissions Report prepared for the proposed project (Appendix A) and would implement all applicable PVCCSP EIR mitigation measures for air quality.</p>
<p><b>Environmental Justice Element</b></p>	
<p><b>Goal 3.1 Policy:</b> Continue to ensure new development is compatible with the surrounding uses by co-locating compatible uses and using physical barriers, geographic features, roadways or other infrastructure to separate less compatible uses. When this is not possible, impacts may be mitigated using: noise barriers, building insulation, sound buffers, traffic diversion.</p>	<p><b>Consistent:</b> The proposed project site is zoned Light Industrial, which allows for land uses such as light industrial and warehouses. Further, the area surrounding the project site is currently developed with multiple light industrial warehouse structures similar in nature to the proposed warehouse.</p>
<p><b>Goal 3.1 Policy:</b> Support identification, cleanup and remediation of local toxic sites through the development review process.</p>	<p><b>Consistent:</b> A Phase I ESA of the project site was prepared by Hazard Management Consulting, Inc. which concluded that there were no RECs, CRECs, or HRECs and/or environmental issues found as part of the assessment. Should any hazardous materials be found on the project site, the project applicant shall</p>



General Plan Policy	Project Consistency
<p><b>Goal 3.1 Policy:</b> As part of the development review process, require conditions that promote Good Neighbor Policies for Industrial Development for industrial buildings larger than 100,000 square feet. The conditions shall be aimed at protecting nearby homes, churches, parks, daycare centers, schools, and nursing homes from air pollution, noise lighting, and traffic associated with large warehouses, making them a "good neighbor."</p>	<p>adhere to all abatement, remediation, and clearance sampling requirements.</p> <p><b>Consistent:</b> The proposed project would comply with all applicable SCAQMD rules and regulations, as outlined in the Air Quality and Greenhouse Gas Emissions Report prepared for the proposed project (Appendix A) and would implement all applicable PVCCSP EIR mitigation measures for air quality. The proposed project would also implement project-specific mitigation measure MM AES-1 and PVCCSP EIR mitigation measures MM Haz 3, which requires outdoor lighting to be hooded or shielded to prevent light spillage, and MM Haz 5, which addresses glare and visual interference. Finally, the proposed project would have a less than significant impact with respect to generating ambient noise in excess of established standards.</p>
<p><b>Goal 5.1 Policy:</b> Require developers to provide pedestrian and bike friendly infrastructure in alignment with the vision set in the City's Active Transportation plan or active transportation in-lieu fee to fund active mobility projects.</p>	<p><b>Consistent:</b> The proposed project frontage would be improved to provide for a multipurpose trail, landscaped parkway, and streetlights in accordance with the City of Perris, County of Riverside, and Caltrans standards. Further, the proposed project would pay applicable development in-lieu fees to provide for construction and maintenance of bikeways and trails.</p>

Furthermore, the City would ensure project consistency with the CBC, PVCCSP, City of Perris General Plan 2030, and zoning code prior to project approval, as identified in the Conditions of Approval and MMRP that will be prepared for the proposed project, outlining the mitigation monitoring timing, required actions, and responsible agencies, prepared for this project. Therefore, the proposed project would not conflict with any policy, regulation, or land use plan adopted by the City and impacts would be less than significant.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

No mitigation required.

### Project-specific Mitigation Measures

No mitigation required.



Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.12 Mineral Resources</b>				
<i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

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?**

**No impact.** According to the California Department of Conservation, Maps of Mines and Mineral Resources, the project site is identified within an area depicted as Urban Land and lies on the edge of Mineral Resource Zone (MRZ)-1, which denotes areas where little likelihood of significant mineral deposits exists.<sup>49</sup> Therefore, there would be no impacts to State or regionally significant mineral resources. No PVCCSP or project-specific mitigation is applicable or required.

- b) **Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

**No impact.** As discussed above, the project site does not lie within an MRZ of State or regional importance. Furthermore, according to the City of Perris 2030 General Plan, the project site and surrounding area are developed as urban land and is zoned for light industrial development. No mining or mineral resource recovery operations operate within the vicinity of the project site. Based on the present zoning of the project site, the lack of mineral resources of State or local importance in the area, and the current disposition of the project site, there would be no impacts. No PVCCSP or project-specific mitigation is applicable or required.

<sup>49</sup> California Department of Conservation. 2015. California Geological Survey. (CGS) Information Warehouse: Mineral Land Classification. Website: <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>. Accessed May 11, 2022.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

No mitigation required.

### Project-specific Mitigation Measures

No mitigation required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.13 Noise</b>				
<i>Would the project result in:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

The analysis in this section is based, in part, on the Noise Impact Analysis Report prepared by FCS on May 17, 2022. The Noise Impact Analysis Report can be found in Appendix G.

### Setting

#### Characteristics of Noise

Noise is defined as unwanted sound. Sound levels are usually measured and expressed in decibels (dB), with 0 dB corresponding roughly to the threshold of hearing. Most of the sounds that we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. Noise is typically generated by transportation, specific land uses, and ongoing human activity.

The standard unit of measurement of the loudness of sound is the decibel (dB). The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of 3 dB or less are only perceptible in laboratory environments. A change of 3 dB is the lowest change that can be perceptible to the human ear in outdoor environments. While a change of 5 A-weighted decibel (dBA) is considered to be the minimum readily perceptible change to the human ear in outdoor environments.

Since the human ear is not equally sensitive to sound at all frequencies, the dBA was derived to relate noise to the sensitivity of humans, it gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for a number of various

sound level metrics, including the day/night sound level ( $L_{dn}$ ) and the CNEL, both of which represent how humans are more sensitive to sound at night. In addition, the equivalent continuous sound level ( $L_{eq}$ ) is the average sound energy of time-varying noise over a sample period and the  $L_{max}$  is the maximum instantaneous noise level occurring over a sample period.

## Regulatory Framework

The project site is located in the PVCCSP within the City of Perris, in the County of Riverside. The City of Perris addresses noise in the Noise Element of its General Plan,<sup>50</sup> in its Municipal Code,<sup>51</sup> and in the PVCCSP.<sup>52</sup>

### City of Perris General Plan

The City of Perris adopted its General Plan Noise Element in August of 2016. The objective of the General Plan's Noise Element is to limit population exposure to physically and/or psychologically damaging or intrusive noise levels. To assist with meeting its objective, the Noise Element of the City's General Plan establishes the Land Use/Noise Compatibility Guidelines. These guidelines are summarized below.

The land use category listed in the City's Land Use/Noise Compatibility Guidelines that most closely applies to the proposed project is light industrial. Under this designation, noise environments up to 70 dBA CNEL are considered "normally acceptable" for this type of new land use development. While environments with ambient noise levels ranging from 70 dBA to 80 dBA CNEL are considered "conditionally acceptable" for this type of land use development; as such, development should only be undertaken after a detailed analysis of noise reduction requirements is made and needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, would normally suffice.

The following are the goals, policies, and implementation measures that are applicable to the project.

**Goal I**            **Land Use Siting. Future land uses compatible with projected noise environments.**

**Policy 1.A**        The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development.

## Implementation Measures

**I.A.1**            All new development proposals will be evaluated with respect to the State Noise/Land Use Compatibility Criteria. Placement of noise-sensitive uses will be discouraged within any area exposed to exterior noise levels that fall into the "Normally Unacceptable" range and prohibited within areas exposed to "Clearly Unacceptable" noise ranges.

<sup>50</sup> City of Perris. 2016. City of Perris General Plan. Noise Element. Website: <https://www.cityofperris.org/home/showpublisheddocument/461/637203139725000000>. Accessed May 12, 2022.

<sup>51</sup> City of Perris. 2022. City of Perris Municipal Code. Website: [https://library.municode.com/ca/perris/codes/code\\_of\\_ordinances](https://library.municode.com/ca/perris/codes/code_of_ordinances). Accessed May 12, 2022.

<sup>52</sup> City of Perris. 2022. Perris Valley Commerce Center Specific Plan (PVCCSP). Amendment No. 12. Website: <https://www.cityofperris.org/Home/ShowDocument?id=2647>. Accessed May 12, 2022.

**I.A.3** Acoustical studies shall be prepared for all new development proposals involving noise-sensitive land uses, as defined in Section 16.22.020J of the Perris Municipal Code, where such projects are adjacent to roadways and within existing or projected roadway CNEL levels of 60 dBA or greater.

**I.A.4** As part of any approvals of noise-sensitive projects where reduction of exterior noise to 65 dBA is not reasonably feasible, the City will require the developer to issue disclosure statements to be identified on all real estate transfers associated with the affected property that identifies regular exposure to roadway noise.

### **City of Perris Municipal Code**

The City of Perris establishes noise performance standards in its noise ordinance. Ordinances applicable to the proposed project are summarized below.

#### *General Prohibition (Section 7.34.050)*

The City's has established general exterior sound level limits at residential properties to a maximum noise level of 60 dBA  $L_{max}$  from 10:01 p.m. to 7:00 a.m., and of 80 dBA  $L_{max}$  from 7:01 a.m. to 10:00 p.m. Furthermore, it is unlawful for any person to create noise that would cause the noise level as measured at an affected property line to exceed the ambient noise level by more than 1.0 decibels.

#### *Construction Noise (Section 7.34.060)*

The City has established that noise generated from construction activity shall not exceed 80 dBA  $L_{max}$  in residential zones in the City. Additionally, construction activities are prohibited 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.

#### *Performance Standards (Section 19.44.070)*

This ordinance establishes the City's noise and vibration performance standards for industrial zone land use developments. The City establishes that noise generated on-site shall be controlled so as to be compatible with surrounding land uses. Any proposed use that may generate noise during evening hours (7:00 p.m. to 7:00 a.m.) must submit a detailed noise assessment and plan addressing and mitigating potential noise impacts. Furthermore, vibrations generated on-site shall not be detectable off-site. Any proposed use that may generate vibrations detectable off-site must submit a detailed vibration assessment and plan addressing and mitigating potential impacts.

### **Perris Valley Commerce Center Specific Plan and Perris Valley Commerce Specific Plan EIR**

#### **Applicable PVCCSP Mitigation Measures**

The proposed project is required to comply with the following applicable mitigation measures from the PVCCSP EIR.

**MM Noise 1** During all project site excavation and grading on-site, the construction contractors shall equip all construction equipment, fixed or mobile, shall be

equipped with properly operating and maintained mufflers consistent with manufacturer's standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise-sensitive receptors nearest the project site.

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

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

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

### ***Existing Noise Environment***

The proposed project site is located within the City of Perris, in the County of Riverside, California. The project site is surrounded by vacant land to the south and west and commercial and a vacant lot beyond Ramona Expressway to the north. To the north beyond the vacant lot of the project site, across a vacant lot, is the closest single-family home to the project site, approximately 500 feet from the nearest construction footprint of the proposed project. Immediately east of the project site beyond Brennan Avenue is a Lowe's warehouse distribution center, and directly south is a vacant lot and storage yard.

Existing traffic noise levels along selected roadway segments in the project vicinity were modeled using the FHWA Traffic Noise Prediction Model (FHWA-RD-77-108). The daily traffic volumes were obtained from the Traffic Analysis prepared for the proposed project.<sup>53</sup> The traffic volumes described here correspond to the existing without project conditions traffic scenario as described in the transportation analysis. The model inputs and outputs—including the 60 dBA, 65 dBA, and 70 dBA CNEL noise contour distances—are provided in the Appendix G of this document. A summary of the modeling results is shown in Table 15.

The results show that traffic noise levels along Ramona Expressway adjacent to the project site range up to approximately 70 dBA CNEL.

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<sup>53</sup> Urban Crossroads, Inc. 2022. Ramona Expressway and Brennan Avenue Warehouse Trip Generation Assessment. January.

**Table 15: Existing Traffic Noise Levels**

Roadway Segment	Approximate ADT	Centerline to 70 CNEL (feet)	Centerline to 65 CNEL (feet)	Centerline to 60 CNEL (feet)	CNEL (dBA) 50 feet from Centerline of Outermost Lane
Ramona Expressway	26,100	88	173	363	69.7

Notes:  
 ADT = Average Daily Traffic; The ADT values are calculated based on the PM peak-hour traffic volumes multiplied by a factor of 10.  
 dBA = A-weighted decibel  
 CNEL = Community Noise Equivalent Level  
 Modeling results do not take into account mitigating features such as topography, vegetative screening, fencing, building design, or structure screening. Rather, they assume a worst-case scenario of having a direct line of site on flat terrain.  
 Source: FirstCarbon Solutions (FCS) 2022.

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?**

**Less than significant impact.** A significant impact would occur if the proposed project resulted in a conflict with the City’s noise land use compatibility standards adopted for the purpose of avoiding or mitigating an environmental effect.

**Construction Noise Impacts**

A significant impact would occur if the project’s construction activities would generate a substantial temporary 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. The City has established that noise generated from construction activity shall not exceed 80 dBA L<sub>max</sub> in residential zones in the City. Additionally, construction activities are prohibited 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.

Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities.

**Construction-Related Traffic Noise**

Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. One type of short-term noise impact that could occur during project construction would result from the increase in traffic flow on local streets, associated with the transport of workers, equipment, and materials to and from the project site. The transport of workers and construction equipment and materials to the project site would

incrementally increase noise levels on access roads leading to the site. Because workers and construction equipment would use existing routes, noise from passing trucks would be similar to existing vehicle-generated noise on these local roadways. Typically, a doubling of the Average Daily Traffic (ADT) hourly volumes on a roadway segment is required in order to result in an increase of 3 dBA in traffic noise levels; which, as discussed in the characteristics of noise discussion above, is the lowest change that can be perceptible to the human ear in outdoor environments. Project-related construction trips would not be expected to double the hourly or daily traffic volumes along any roadway segment in the project vicinity. For this reason, short-term intermittent noise from construction trips would not be expected to result in a perceptible increase in hourly- or daily-average traffic noise levels in the project vicinity. Therefore, short-term construction-related noise impacts associated with the transportation of workers and equipment to the project site would be less than significant.

### **Construction Equipment Operational Noise**

The second type of short-term noise impact is related to noise generated during construction on the project site. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 or 4 minutes at lower power settings. Impact equipment such as pile drivers are not expected to be used during construction of this project.

The site preparation phase, which includes excavation and grading of the site, tends to generate the highest noise levels because the noisiest construction equipment is earthmoving equipment. Earthmoving equipment includes excavating machinery and compacting equipment, such as bulldozers, draglines, backhoes, front loaders, roller compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 or 4 minutes at lower power settings.

Construction of the project is expected to require the use of scrapers, bulldozers, water trucks, haul trucks, and pickup trucks. Based on the information provided in the Highway Construction Noise Handbook,<sup>54</sup> the maximum noise level generated by each scraper is assumed to be 85 dBA  $L_{max}$  at 50 feet from this equipment. Each bulldozer would also generate 85 dBA  $L_{max}$  at 50 feet. The maximum noise level generated by graders is approximately 85 dBA  $L_{max}$  at 50 feet. A characteristic of sound is that each doubling of sound sources with equal strength increases a sound level by 3 dBA. Assuming that each piece of construction equipment operates at some distance from the other equipment, a reasonable worst-case combined noise level during this phase of construction would be 90 dBA  $L_{max}$  at a distance of 50 feet from the acoustic center of a construction area. This would result in a reasonable worst-case hourly average of 86 dBA  $L_{eq}$ . The acoustic center reference is used, because construction

<sup>54</sup> Federal Highway Administration (FHWA). 2006. Highway Construction Noise Handbook. August.



equipment must operate at some distance from one another on a project site, and the combined noise level as measured at a point equidistant from the sources (acoustic center) would be the worst-case maximum noise level. The effect on sensitive receptors is evaluated below.

The closest noise-sensitive receptor to the project site is a single-family residence north of the project site on Brennan Avenue. The façade of this single-family home would be located approximately 500 feet from the acoustic center of construction activity where multiple pieces of heavy construction equipment would operate simultaneously during project construction. At this distance, relative worst-case maximum construction noise levels would attenuate to below 70 dBA  $L_{max}$ , with reasonable worst-case hourly average noise levels attenuating to below 66 dBA  $L_{eq}$ . These construction noise levels would not exceed the construction noise limits established by the City of 80 dBA  $L_{max}$  as measured at the nearest residential property line. Therefore, the impact of the proposed project would be less than significant. In addition, the proposed project must comply with the applicable mitigation measures from the PVCCSP EIR, including PVCCSP EIR mitigation measures MM Noise 1 through MM Noise 4, which include best management noise reduction measures to further reduce construction noise impacts.

Furthermore, Section 7.34.060 of the City's Municipal Code prohibits construction activities 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. Because the proposed project would comply with this Municipal Code requirement restricting construction activities to daytime hours would preclude the project from creating a substantial noise increase during nighttime hours that could result in sleep disturbance of sensitive receptors in the project vicinity. Therefore, project construction noise impacts would not result in a substantial temporary noise increase as measured at the nearest residential receptors, and the impact would be less than significant. Mobile Source Operational Noise Impacts

A significant impact would occur if implementation of the proposed project would result in a substantial increase in traffic noise levels compared with traffic noise levels existing without the project. As noted in the characteristics of noise discussion, audible increases in noise levels refer to a change of 3 dBA or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. Therefore, an increase of 3 dBA or above existing traffic noise levels would be considered a substantial permanent increase in traffic noise levels for the purpose of this analysis.

The proposed project would result in the addition of approximately 286 daily vehicle trips on nearby roadways, including 27 new trips during the AM peak-hour and 29 new trips during the PM peak-hour. As shown in Table 15, the existing traffic volumes along Ramona Expressway adjacent to the project site have 26,100 average daily trips. Therefore, these project trips would not result in a doubling of traffic volumes along any roadway segment in the project vicinity on an hourly or on a 24-hour average basis. A characteristic of noise is that a doubling of sound sources with equal strength is required to result in a perceptible increase (defined to be a 3 dBA or greater) in noise levels. As a result, the proposed project would not result in even a 1.0 dBA increase in traffic noise levels along any roadway segment in the project vicinity, and any increase would be well below the 3 dBA increase that would be considered substantial.

Based on the projected trip distribution, Brennan Avenue would experience an estimated 92 daily automobile vehicle trips and 102 daily truck trips. This volume of vehicles would result in ADT noise levels of less than 59 dBA CNEL as measured at 50 feet from the centerline of the outermost travel lane. These traffic noise levels would not result in a substantial permanent increase in ambient noise levels above existing background ambient noise levels along this roadway segment.

Therefore, impacts from project-related traffic noise levels would not result in a substantial permanent increase in traffic noise levels in excess of applicable standards, and the impact would be less than significant.

### **Stationary Source Operational Noise Impacts**

A significant impact would occur if implementation of the proposed project would result in a substantial increase of more than 1 dBA in ambient noise levels as measured at residential land uses. The City limits exterior sound levels as measured at residential properties to 60 dBA  $L_{max}$  from 10:01 p.m. to 7:00 a.m., and 80 dBA  $L_{max}$  from 7:01 a.m. to 10:00 p.m. Furthermore, it is unlawful for any person to create noise that would cause the noise level as measured at an affected property line to exceed the ambient noise level by more than 1.0 dBA.

The proposed project would generate noise from truck delivery, loading and unloading activities at commercial loading areas; parking lot activities, which includes people conversing, doors shutting, engine startup, and slow-moving vehicles; and from new exterior mechanical equipment sources, such as rooftop ventilation systems. Potential impacts from these noise sources are discussed below.

### **Truck Loading Activities**

Noise would be generated by truck loading and unloading activities at the loading docks along the southern, western, and northern sides of the proposed building. Typical noise levels from truck loading and unloading activity range from 70 dBA to 80 dBA  $L_{max}$  as measured at 50 feet. This maximum noise level range includes noise from associated truck loading/unloading activity, including trucks maneuvering, truck trailer loading, truck trailer unloading, backup alarms or beepers, and truck docking noise.

The proposed loading areas would be located on the southern side of the proposed warehouse building. The nearest noise-sensitive receptor to these proposed truck loading areas is a single-family residence located south of the project site on Brennan Avenue. The property line of this residential receptor is approximately 670 feet from the nearest proposed loading dock. Because of distance attenuation, noise levels from truck loading and unloading activities would attenuate to below 58 dBA  $L_{max}$  at this nearest property line of this sensitive receptor land use. As noted previously, existing traffic noise levels on Ramona Expressway, adjacent to the project site, range up to approximately 70 dBA CNEL, at 50-feet from the centerline of the outermost travel lane.

Therefore, noise levels from truck loading and unloading activities would not exceed existing ambient noise levels. Additionally, the noise levels from truck loading would not exceed the daytime (80 dBA  $L_{max}$ ) nor nighttime (60 dBA  $L_{max}$ ) noise performance standards at this nearest sensitive receptor. Therefore, noise levels from truck loading and unloading activities would not generate a

substantial temporary or permanent increase in ambient noise levels in the project vicinity and would be less than significant.

### **Parking Lot Activities**

Typical parking lot activities include people conversing, doors shutting, and vehicles idling which generate noise levels ranging from approximately 60 dBA to 70 dBA  $L_{max}$  at 50 feet. These activities are expected to occur sporadically throughout the day, as visitors and staff arrive and leave parking lot areas at the project site.

The nearest noise-sensitive receptor to proposed parking areas is a single-family residence north of the project site on Brennan Avenue. Proposed parking areas could be located approximately 520 feet from the property line of this closest sensitive receptor. At this distance, noise generated by typical parking lot activity would attenuate to below 50 dBA  $L_{max}$ . As noted previously, existing traffic noise levels on Ramona Expressway, adjacent to the project site, range up to approximately 70 dBA CNEL, at 50-feet from the centerline of the outermost travel lane.

Therefore, noise levels from parking lot activities would not exceed existing ambient noise levels. Additionally, the noise levels from parking lot activities would not exceed the daytime (80 dBA  $L_{max}$ ) nor nighttime (60 dBA  $L_{max}$ ) noise performance standards at this nearest sensitive receptor. Therefore, noise levels from parking lot activities would not generate a substantial temporary or permanent increase in ambient noise levels in the project vicinity and would be less than significant.

### **Mechanical Equipment Operations**

At the time of preparation of this analysis, details were not available pertaining to the proposed rooftop mechanical ventilation systems for the project; therefore, a reference noise level for typical rooftop mechanical ventilation systems was used. Noise levels from commercially available rooftop mechanical ventilation equipment range from 50 dBA to 60 dBA  $L_{eq}$  at a distance of 25 feet.

The nearest noise-sensitive receptor to proposed rooftop mechanical ventilation equipment is a single-family residence north of the project site on Brennan Avenue. Rooftop mechanical ventilation equipment could be located approximately 550 feet from the property line of this closest sensitive receptor. At this distance, noise generated by typical rooftop mechanical ventilation equipment would attenuate to below 34 dBA  $L_{max}$ . As noted previously, existing traffic noise levels on Ramona Expressway, adjacent to the project site, range up to approximately 70 dBA CNEL, at 50-feet from the centerline of the outermost travel lane.

Therefore, noise levels from mechanical ventilation equipment operations would not exceed existing ambient noise levels. Additionally, the noise levels from mechanical ventilation equipment operations would not exceed the daytime (80 dBA  $L_{max}$ ) nor nighttime (60 dBA  $L_{max}$ ) noise performance standards at this nearest sensitive receptor. Therefore, noise levels from mechanical ventilation equipment operations would not generate a substantial temporary or permanent increase in ambient noise levels in the project vicinity and would be less than significant.

**b) Generation of excessive groundborne vibration or groundborne noise levels?**

**Less than significant impact.** A significant impact would occur if the proposed project would generate groundborne vibration or groundborne noise levels in excess of established standards. The City of Perris has not established vibration standards for temporary construction activities. Therefore, the FTA's vibration impact criteria are utilized for the purpose of this analysis. The FTA has established industry accepted standards for vibration impact criteria and impact assessment. These guidelines are published in its Transit Noise and Vibration Impact Assessment Manual.<sup>55</sup> However, the City has established a standard for ongoing operational activity vibration impacts, which is to prohibit operations that would generate vibration which is discernible beyond the boundary line of a property.

**Short-Term Construction Vibration Impacts**

Of the variety of equipment used during construction, the large vibratory rollers that are anticipated to be used in the site preparation phase of construction would produce the greatest groundborne vibration levels. Large vibratory rollers produce groundborne vibration levels ranging up to 0.201 inch per second (in/sec) peak particle velocity (PPV) at 25 feet from the operating equipment.

The nearest off-site structure to the project construction footprint is the Carl's Jr. commercial building located north of the project site on Ramona Expressway. The façade of this closest structure would be located approximately 240 feet from the construction footprint where the heaviest construction equipment would potentially operate. At this distance, groundborne vibration levels would range up to 0.003 in/sec PPV from operation of the types of equipment that would produce the highest vibration levels. This is well below the FTA's Construction Vibration Impact Criteria of 0.2 in/sec PPV for this type of structure, a building of non-engineered timber and masonry construction. Therefore, project construction activities would not generate groundborne vibration or groundborne noise levels in excess of established standards, and the impact to off-site receptors from short-term groundborne vibration associated with construction would be less than significant.

**Operational Vibration Impacts**

Implementation of the proposed project would not include any new permanent sources that would expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments beyond the boundary line of the project property. Additionally, there are no active sources of groundborne vibration in the project vicinity that would produce vibration levels that would be perceptible without instruments within the project site. Therefore, the proposed project would not generate groundborne vibration or groundborne noise levels in excess of established standards and there would be no impact related to operational groundborne vibration.

No PVCCSP or project-specific mitigation is applicable or required.

<sup>55</sup> Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September.

- 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?

**No impact.** A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels for a project located in the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport.

The nearest public airport to the project site is the MARB/IPA, located approximately 1.5 miles north of the project site. According to the airport's noise exposure map, the project site is located outside of the 65 dBA CNEL airport noise contours.<sup>56</sup> While aircraft noise is occasionally audible on the project site from aircraft flyovers, aircraft noise associated with nearby airport activity would not expose people residing or working near the project site to excessive noise levels. Therefore, implementation of the proposed project would not expose persons residing or working in the project vicinity to noise levels from airport activity that would be in excess of normally acceptable standards for the proposed land use development, and no impact would occur. No PVCCSP or project-specific mitigation is applicable or required.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

The proposed project is required to comply with the following applicable mitigation measures from the PVCCSP EIR.

- MM Noise 1** During all project site excavation and grading on-site, the construction contractors shall equip all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers consistent with manufacturer's standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise-sensitive receptors nearest the project site.
- MM Noise 2** During construction, stationary construction equipment, stockpiling and vehicle staging areas will be placed a minimum of 446 feet away from the closest sensitive receptor.
- MM Noise 3** No combustion-powered equipment, such as pumps or generators, shall be allowed to operate within 446 feet of any occupied residence unless the equipment is surrounded by a noise protection barrier.

<sup>56</sup> March Air Reserve Base (MARB). 2014. Riverside County Airport Land Use Compatibility Plan. Website: <https://www.rcaluc.org/Portals/13/42%20-%20Vol.%202%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-150039-073>. Accessed May 11, 2022.

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

### Project-specific Mitigation Measures

No mitigation required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.14 Population and Housing</b> <i>Would the project:</i>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

### Setting

According to the California Department of Finance, the City of Perris has average of 4.10 persons per household and a population of 78,890 as of January 1, 2022.<sup>57</sup>

Would the project:

- a) **Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

**No impact.** The proposed project does not include new residential uses; and therefore, it would not directly increase the City’s population. Rather, the proposed project includes the development of a warehouse building on a lot designated and zoned for light industrial uses under the PVCCSP. The proposed project would be completed second quarter of 2023 and could employ approximately 68 full-time staff/employees once completed. Because of the nature of the proposed project, the labor skills required for the proposed project are typically filled by workers who are already present in the local labor force. No features of the proposed project would be expected to have a substantial effect on the existing or planned population of the City of Perris. Therefore, substantial population growth is not expected to occur because of the employment opportunities resulting from project buildout and no impact would occur. No PVCCSP or project-specific mitigation is applicable or required.

<sup>57</sup> California Department of Finance. E-5 Population and Housing Estimates for Cities, Counties, and the State. Website: <https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2021/>. Accessed May 10, 2022.

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

**No impact.** The proposed project would develop a lot currently used for storage of a variety of materials and currently contains five permanent buildings. A wood-framed commercial building and a vacant residential building are present on the southeast portion of the site. Two connected metal structures are present on the central portion of the site. A shed-type structure is present on the southwest portion of the site. No housing development is proposed as part of this project. While the proposed project would involve demolition of a single residential building, it would not displace any residents as it is currently vacant. Since no occupied housing units would be displaced as part of the proposed project's implementation, no replacement housing would be required, and no impacts are expected to occur. No PVCCSP or project-specific mitigation is applicable or required.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

No mitigation required.

### Project-specific Mitigation Measures

No mitigation required.



Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.15 Public Services</b>				
<i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i>				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

**Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

**a) Fire protection?**

**Less than significant impact.** Fire protection and emergency medical services at the project site are provide by the RCFD. The nearest station to the project site is located at 333 Placentia Avenue in the City of Perris, approximately 2.7 miles. The proposed project would not directly generate population growth because it does not include any housing which typically increases the need for fire protection services. The proposed project would also comply with Title 16 of the City of Perris Code of Ordinances and would require installation of automatic fire suppression systems within the project structure, since the gross area of the project structure exceeds 3,500 square feet. RCFD would review the development plans to ascertain the nature and extent of any additional measures that may be required to meet any Fire Code requirements. Lastly, the proposed project would be required to submit Development Impact Fees (DIFs) at a rate of \$102.00 per 1,000 square feet.<sup>58</sup> These fees are accumulated for future expansion of facilities and resources, as needed. Therefore, impacts would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

<sup>58</sup> City of Perris. 2020. Developer Impact Fees. June. Website: <https://www.cityofperris.org/Home/ShowDocument?id=13362>. Accessed April 4, 2022.

**b) Police protection?**

**Less than significant impact.** According to the City of Perris website, the City of Perris contracts with the Riverside County Sheriff's Department for police services.<sup>59</sup> However, based on available information, the proposed project would not significantly impact the Sheriff's Department's ability to service the surrounding area. The Perris Police Station is located at 137 North Perris Boulevard, approximately 4.7 miles south of the project site. According to a 2017 year-end report prepared by the Perris station of the Riverside County Sheriff's Department provides approximately 0.82 officers per 1,000 residents of the City and operates 24 hours per day. According to the City of Perris 2030 General Plan, the Sheriff's Department aims to achieve a ratio of approximately one officer for every 1,000 residents. The police department consists of 33 sworn officers, as of 2017. Furthermore, according to the City of Perris Average Response Time Statistics chart within the 2017 year-end report, the average response time for emergency calls was approximately 6.35 minutes.<sup>60</sup> The proposed project would not directly increase the population of the City since it does not include any housing that typically increases the need for police protection. Therefore, because the proposed project would not restrict access to the community and would not increase the population of the City, impacts would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

**c) Schools?**

**Less than significant impact.** The proposed project includes the development of a light industrial warehouse building. No residential development is proposed with this project. As such, it would not generate the need for new or altered school facilities. Because of the nature of the proposed project, the labor skills required for the proposed project are typically filled by workers who are already present in the local labor force. However, there is the potential for the proposed project to indirectly affect schools by providing a source of employment that may draw some new residents into the area. Appropriate DIFs, as required by State law, would be assessed and paid to the applicable school district. Since the proposed project does not include any new housing, any potential impacts would be considered incremental and would be offset through the payment of the appropriate DIFs. Therefore, potential impacts associated with schools would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

**d) Parks?**

**Less than significant impact.** The proposed project does not include improvements to, or the usage of, parks and recreational facilities within the City of Perris. Although the proposed project would require employees, likely sourced from the surrounding area, the proposed project would not directly increase the population of the City or generate the need for new or altered public parks. The area surrounding the project site is developed with light industrial structures, and no existing parks would be impacted by this development. As mentioned above, because of the nature of the proposed project, the labor skills required for the proposed project are typically filled by workers

<sup>59</sup> City of Perris. 2020. Police. Website: <http://www.cityofperris.org/departments/police>. Accessed April 4, 2022.

<sup>60</sup> City of Perris. 2018. Year End Report 2017. March. Website: <http://www.cityofperris.org/news/2018/photos/03-19-18-perris-year-end-report-2017.pdf>. Accessed April 4, 2022.

who are already present in the local labor force. However, there is potential for the proposed project to indirectly affect public recreational facilities by providing a source of employment that may draw some new residents into the area. The applicable Recreational Facilities DIFs would be assessed and paid toward parks. With the payment of these fees, the impacts to parks and other public recreational facilities would be reduced to a less than significant level. No PVCCSP or project-specific mitigation is applicable or required.

**e) Other public facilities?**

**Less than significant impact.** Other public facilities such as libraries would potentially be impacted if the proposed project included the development of residential or commercial land uses. However, there is potential for the proposed project to indirectly affect other public facilities by providing a source of employment that may draw some new residents into the area, with indirect effects to other public facilities. The proposed project would be subject to applicable DIFs for City of Perris public facilities. With the payment of these fees, impacts to other public facilities would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

No mitigation required.

### Project-specific Mitigation Measures

No mitigation required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.16 Recreation</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

- 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?**

**Less than significant impact.** The proposed project includes the development of a light industrial warehouse building. Although the proposed project may indirectly affect existing recreational facilities by creating new jobs in the area which may draw some new residents to the area, it is anticipated that the majority of jobs would be filled by individuals already residing in the local vicinity. Indirect impacts to park facilities would be offset through payment of the applicable Recreational Facilities DIFs. Therefore, with payment of these fees, potential impacts associated with parks and other public recreational facilities would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

- 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?**

**No impact.** As discussed above, the proposed project includes the construction of a warehouse. In accordance with PVCCSP Industrial Design Standard 8.2.1.3, which requires the provision of outdoor break areas as well as additional amenities for buildings exceeding 100,000 square feet,<sup>61</sup> the proposed project would include an outdoor gym park and employee break/seating patio. Because project employees would be generated from the existing labor force, the proposed project is not growth inducing and would not result in a significant increase in population. Therefore, there would not be an increased use of recreational facilities in the City of Perris. Therefore, no impacts would occur. No PVCCSP or project-specific mitigation is applicable or required.

<sup>61</sup> City of Perris. 2022. Perris Valley Commerce Center Specific Plan (PVCCSP). Amendment No. 12. Website: <https://www.cityofperris.org/Home/ShowDocument?id=2647>. Accessed August 22, 2022

## **Mitigation Measures**

### **Applicable PVCCSP Mitigation Measures**

None applicable.

### **Project-specific Mitigation Measures**

No mitigation required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.17 Transportation</b>				
<i>Would the project:</i>				
a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

The analysis in this section is based, in part, on the Trip Generation Assessment and VMT Screening Evaluation prepared by Urban Crossroads, Inc. on April 26, 2022. The Trip Generation Assessment and VMT Screening Evaluation can be found in Appendix I.

Would the project:

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

**Less than significant impact with mitigation incorporated.** In accordance with PVCCSP mitigation measure MM Trans 7, Urban Crossroads, Inc. prepared a Trip Generation Assessment for the proposed project on April 26, 2022. Trip generation rates used for the analysis were based upon information collected by the Institute of Transportation Engineers (ITE) as provided in their Trip Generation Manual for the proposed warehousing use, as shown in Table 16 below.

**Table 16: Trip Generation Rates**

Land use <sup>1</sup>	Units <sup>2</sup>	ITE LU Code	AM Peak-hour			PM Peak-hour			Daily
			In	Out	Total	In	Out	Total	
<b>Actual Vehicle Trip Generation Rates</b>									
Warehousing <sup>3</sup>	TSF	150	0.131	0.039	0.170	0.050	0.130	0.180	1.710
Passenger Cars (AM = 88.2%, Daily = 64.9%)			0.120	0.030	0.150	0.034	0.116	0.150	1.110

Land use <sup>1</sup>	Units <sup>2</sup>	ITE LU Code	AM Peak-hour			PM Peak-hour			Daily
			In	Out	Total	In	Out	Total	
2-axle Trucks (AM = 1.97%, PM = 2.79%, Daily = 5.86%)			0.002	0.001	0.003	0.003	0.002	0.005	0.100
3-axle Trucks (AM = 2.44%, PM = 3.46%, Daily = 7.27%)			0.002	0.002	0.004	0.003	0.003	0.006	0.124
4+ axle Trucks (AM = 7.39%, PM = 10.45%, Daily = 21.97%)			0.007	0.006	0.013	0.010	0.009	0.019	0.376
<b>PCE Trip Generation Rates<sup>4</sup></b>									
Warehousing <sup>3</sup>	TSF	150	0.131	0.039	0.170	0.050	0.130	0.180	1.710
Passenger Cars			0.120	0.030	0.150	0.034	0.116	0.150	1.110
2-axle Trucks (PCE = 1.5)			0.003	0.002	0.005	0.005	0.003	0.008	0.150
3-axle Trucks (PCE = 2.0)			0.004	0.004	0.008	0.006	0.006	0.012	0.248
4+ axle Trucks (PCE = 3.0)			0.021	0.017	0.038	0.030	0.026	0.056	1.127
Notes: ITE = Institute of Transportation Engineers LU = Land Use PCE = Passenger Car Equivalent <sup>1</sup> Trip Generation and Vehicle Mix Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021) <sup>2</sup> TSF = thousand square feet <sup>3</sup> Truck Mix: South Coast Air Quality Management District’s (SCAQMD) recommended truck mix, by axle type. Normalized %—without Cold Storage: 16.7% 2-axle trucks, 20.7% 3-axle trucks, 62.6% 4-axle trucks <sup>4</sup> PCE factors: 2-axle = 1.5; 3-axle = 2.0; 4+ axle = 3.0									

The trip generation summary, illustrating daily and peak-hour trip generation estimates for the proposed project in actual and Passenger Car Equivalent (PCE) vehicles, are shown in Table 17 below. As shown in Table 17 below, the proposed project is anticipated to generate a total of 286 two-way trips per day with 27 AM peak-hour trips and 29 PM peak-hour trips (in actual vehicles). In comparison, the proposed project is anticipated to generate a total of 438 PCE two-way trips per day with 33 PCE AM peak-hour trips and 37 PCE PM peak-hour trips.

**Table 17: Proposed Project Trip Generation Summary**

Land use	Quantity Units <sup>1</sup>	AM Peak-hour			PM Peak-hour			Daily
		In	Out	Total	In	Out	Total	
<b>Actual Vehicles</b>								
Warehousing	165.371 TSF							
Passenger Cars:		20	5	25	6	19	25	18.4

Land use	Quantity Units <sup>1</sup>	AM Peak-hour			PM Peak-hour			Daily
		In	Out	Total	In	Out	Total	
2-axle Trucks:		0	0	0	0	0	0	18
3-axle Trucks:		0	0	0	0	1	1	22
4+ axle Trucks:		1	1	2	2	1	3	62
Total Truck Trips (Actual Vehicles):		1	1	2	2	2	4	102
<b>Total Trips (Actual Vehicles)<sup>2</sup></b>		<b>21</b>	<b>6</b>	<b>27</b>	<b>8</b>	<b>21</b>	<b>29</b>	<b>286</b>
<b>Passenger Car Equivalent (PCE)</b>								
Warehousing	165.371 TSF							
Passenger Cars:		20	5	25	6	19	25	18.4
2-axle Trucks:		0	0	0	1	0	1	26
3-axle Trucks:		1	1	2	1	1	2	42
4+ axle Trucks:		3	3	6	5	4	9	186
Total Truck Trips (Actual Vehicles):		4	4	8	7	5	12	254
<b>Total Trips (Actual Vehicles)<sup>2</sup></b>		<b>24</b>	<b>9</b>	<b>33</b>	<b>13</b>	<b>24</b>	<b>37</b>	<b>438</b>
Notes:								
<sup>1</sup> TSF = thousand square feet								
<sup>2</sup> Total Trips = Passenger Cars + Truck Trips								

The proposed project is anticipated to generate fewer than 50 peak-hour trips and fewer than 500 two-way trips per day for actual vehicles and PCE. Per the City’s Guidelines, no additional traffic operations analysis is necessary.

### Trip Distribution

Trip distribution is the process of identifying the probable destinations, directions or traffic routes that would be utilized by project traffic. The potential interaction between the planned land uses and surrounding regional access routes are considered, to identify the route where the proposed project traffic would distribute. The project trip distribution and assignment process represents the directional orientation of traffic to and from the project site. The trip distribution pattern of passenger cars is heavily influenced by the geographical location of the site, the location of surrounding land uses, and the proximity to the regional freeway system.

The trip distribution pattern for truck traffic is also influenced by the local truck routes. Given these differences, separate trip distributions were generated for both passenger cars and truck trips. The project passenger car and truck trip distribution patterns are graphically depicted on Exhibits 2 and 3 of the Trip Generation Assessment (Appendix I). Note that Ramona Expressway is not a City truck route. All trucks would need to utilize the access on Brennan Avenue to access Morgan Street to the south. From Morgan Street, trucks would likely access Indian Avenue to access the new Placentia Avenue interchange which is anticipated to open in Summer 2022. Alternatively, northbound trucks can also utilize Indian Avenue to travel north to Harley Knox Boulevard.



The Trip Generation Assessment included site access recommendations, which are based on the minimum improvements required to accommodate site access for the proposed project. These recommendations are included as project-specific mitigation measures MM TRANS-1 through MM TRANS-3, which require installation of a stop control and curb and gutter modifications at Driveways 1 and 2, as well as traffic signing and striping. Furthermore, the proposed project would adhere to the requirements of PVCCSP EIR mitigation measures MM Trans 1 through MM Trans 5 and MM Trans 7, which require construction of roadway improvements pursuant to the requirements outlined in the PVCC Circulation Plan, review of sight distance at project entrance, phased construction of off-site traffic signals through payment of fair share mitigation fees, consultation with RTA, installation of bike racks in parking areas, and implementation of project-level traffic studies (satisfied by implementation of project-specific mitigation measures MM TRANS-1 through MM TRANS-3). Finally, the proposed project would construct a multipurpose trail and a landscaped parkway, as well as sidewalk, curb, and gutter improvements along Ramona Expressway consistent with the requirements of the PVCCSP.

PVCCSP mitigation measures MM Air 18 and MM Trans 4 require the project applicant to contact the RTA to determine whether the RTA has plans for the future provision of bus routing within any street that is adjacent to the project site and that would require bus stops at the project access points. Consultation between Urban Crossroads and the RTA occurred on June 2, 2022. The RTA requested the construction of a sidewalk along Ramona Expressway to be utilized by the public when there is an opportunity to add a bus stop on Ramona Expressway. The RTA also requested plans related to the channel along Ramona Expressway. After providing plans and a description of improvements along Ramona Expressway, the RTA deemed consultation acceptable on July 7, 2002. Therefore, the project has complied with PVCCSP EIR mitigation measures MM Air 18 and MM Trans 4.

With adherence to PVCCSP EIR mitigation measures MM Trans 1 through MM Trans 7 and implementation of the required improvements outlined under project-specific mitigation measures MM TRANS-1 through MM TRANS-3, adequate access to the site would be provided and traffic impacts would be less than significant.

**b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**

**Less than significant impact.** Urban Crossroads, Inc. prepared a VMT Screening Evaluation for the proposed project on April 26, 2022, in accordance with the City of Perris Transportation Impact Analysis Guidelines for CEQA. City's Guidelines list standardized screening methods for project-level VMT analysis that can be used to identify when a proposed land use development project is anticipated to result in a less than significant impact thereby eliminating the need to conduct a full VMT analysis. The VMT Screening Evaluation for the project analyzed the project against the Affordable Housing, High Quality Transit Areas (HQTAs) Screening, Local-Serving Land Use, Low VMT Area, and Net Daily Trips Less than 500 ADT criteria outlined in the City's Guidelines. As stated by the City Guidelines, land use development projects only need to meet one of the above screening criteria to result in a less than significant impact.

The proposed project does not propose to develop any residential or local-serving land uses, and therefore the Affordable Housing and Local-Serving Land Use screening criteria are not met.

Consistent with the guidance identified in the City Guidelines, projects located within a Transit Priority Area (TPA) (i.e., within 0.5 mile of an existing “major transit stop” or an existing stop along a “high-quality transit corridor”) may be presumed to have a less than significant impact absent substantial evidence to the contrary. However, the presumption may not be accurate if a project meets one or more of the following:

1. Has a FAR of less than 0.75;
2. Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
3. Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
4. Replaces affordable residential units with a smaller number of moderate or high-income residential units.

City Guidelines provide a map of HQTA areas within the City. The proposed project is located within 0.5 mile of Perris Boulevard, which is included on the map. However, further review of the secondary criteria above, the proposed project does not qualify for the HQTA screening as it contains a FAR of 0.75 or less.

Additionally, the proposed project is not located within a low VMT generating zone, and therefore, the Low VMT Area screening criteria is not met. City Guidelines identify projects that generate less than 500 ADT would not cause a substantial increase in the total Citywide or regional VMT and are presumed to have a less than significant impact on VMT. As indicated in Table 17 above, the proposed project is anticipated to generate 286 daily vehicle trip ends per day. Therefore, the proposed project generates daily vehicle trips below the 500 daily vehicle trip threshold, and the Net Daily Trips Less than 500 ADT screening criteria is met. Impacts would be less than significant and no further VMT analysis is required. No PVCCSP or project-specific mitigation is applicable or required.

**c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**Less than significant impact with mitigation incorporated.** The proposed project includes the construction of a warehouse at the corner of Ramona Expressway and Brennan Avenue. The proposed project does not propose any improvements or design features that would create hazards, such as sharp curves or dangerous intersections, and does not include any uses that are incompatible with the surrounding area. Upon review of the project site plan, the City would ensure that the proposed project would not substantially increase hazards due to incompatible uses or design features. The proposed project would comply with PVCCSP EIR mitigation measures MM Trans 2, which requires the project to comply with Caltrans standards and City of Perris prior to final grading, landscape, and street improvement plans. To further ensure impacts are reduced to below a level of significance, the proposed project would install a stop control and curb and gutter improvements to further accommodate access to the site, in accordance with project-specific mitigation measures MM TRANS-1 through MM TRANS-3. Therefore, because the proposed project

would be designed to provide safe and appropriate access to the project site and surrounding area, impacts would be less than significant with mitigation.

**d) Result in inadequate emergency access?**

**Less than significant impact.** As discussed above, the proposed project would be constructed in a manner which would allow for appropriate and safe access to the project site and surrounding area. Passenger cars would be provided access to the site via one right-in/right-out 35-foot driveway along Ramona Expressway while trucks would be provided site access via one full access 40-foot driveway along Brennan Avenue. Furthermore, a 26-foot-wide fire lane is proposed throughout the project site which would provide emergency and fire truck access. Therefore, development of the proposed project would not result in inadequate emergency access. Impacts would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

The proposed project is required to comply with the following applicable mitigation measures from the PVCCSP EIR.

- MM Trans 1** The project applicant shall construct on-site roadway improvements pursuant to the general alignments and right-of-way sections set forth in the PVCC Circulation Plan, except where said improvements have previously been constructed.
- MM Trans 2** Sight distance at the project entrance roadway of the project shall be reviewed with respect to standard City of Perris sight distance standards at the time of preparation of final grading, landscape and street improvement plans.
- MM Trans 3** The project shall participate in the phased construction of off-site traffic signals through payment of that project's fair share of traffic signal mitigation fees and the cost of other off-site improvements through payment of fair share mitigation fees which include Transportation Uniform Mitigation Fee (TUMF), Development Impact Fee (DIF), and the North Perris Road and Bridge Benefit District (NPRBBD). The fees shall be collected and utilized as needed by the City of Perris to construct the improvements necessary to maintain the required level of service and build or improve roads to their buildout level.
- MM Trans 5** Bike racks shall be installed in all parking lots in compliance with City of Perris standards.
- MM Trans 7** Implementing project-level traffic impact studies shall be required for all subsequent implementing development proposals within the boundaries of the PVCCSP as approved by the City of Perris Engineering Department. These subsequent traffic studies shall identify specific project impacts and needed

roadway improvements to be constructed in conjunction with each implementing development project. All intersection spacing for individual tracts or maps shall conform to the minimum City intersection spacing standards. All turn pocket lengths shall conform at least to the minimum City turn pocket length standards. If any of the proposed improvements are found to be infeasible, the implementing development project applicant will be required to provide alternative feasible improvements to achieve levels of service satisfactory to the City.

## Project-specific Mitigation Measures

### **MM TRANS-1      Driveway 1 and Ramona Expressway**

The following improvements shall be constructed to accommodate site access:

The project applicant shall install a stop control on the northbound approach and a northbound right turn lane. The eastbound right turn volume at this driveway would not exceed 20 inbound passenger cars (in the AM peak-hour) and would not warrant a dedicated right turn lane. In addition, the eastbound curb-adjacent lane is 20-feet in width and could accommodate a defacto right turn lane at this driveway. Access at the intersection shall be controlled to right-in/right-out access only for passenger cars via the existing raised median.

### **MM TRANS-2      Driveway 2 and Brennan Avenue**

The following improvements shall be constructed to accommodate site access:

The proposed project shall install a stop control on the eastbound approach and an eastbound shared left-right turn lane. No additional lane improvements are proposed along Brennan Avenue to facilitate site access.

### **MM TRANS-3      The existing curb and gutter shall be modified to accommodate site access at Driveway 1 on Ramona Expressway and Driveway 2 on Brennan Avenue.**

On-site traffic signing and striping shall be implemented agreeable with the provisions of the California Manual on Uniform Traffic Control Devices (CA MUTCD) and in conjunction with detailed construction plans for the project site.

Sight distance at each project access point shall be reviewed with respect to standard Caltrans and City of Perris sight distance standards at the time of preparation of final grading, landscape, and street improvement plans.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.18 Utilities and Service Systems</b>				
<i>Would the project:</i>				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

Would the project:

- a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**Less than significant impact.**

### Water/Wastewater

Domestic water provided to the City of Perris is supplied by the EMWD. The EMWD provides water to the communities of Moreno Valley, Perris, Lakeview, Menifee, and Hemet as well as other cities within the region. The majority of the EMWD's potable (drinking) water demand is supplied by imported water from the Metropolitan Water District of Southern California (MWD) through its Colorado River Aqueduct and its connections to the State Water Project. Approximately 20 percent

of EMWD's groundwater is supplied from groundwater wells. The majority of the groundwater produced by the EMWD comes from its wells in the Hemet and San Jacinto area. Some of these wells have limited production as a result of the Fruitvale Judgment and Decree. The EMWD also has wells in the Moreno Valley, Perris Valley, and Murrieta areas.<sup>62</sup>

Utilizing an estimated operational water demand of 550 gallons per day (gpd) per acre, the proposed project is estimated to require approximately 3,800 gallons of water per day for the 7.5-acre site. The proposed project would extend a 12-inch water line along Ramona Expressway from the western connection point to the northeastern corner of Ramona Expressway and Brennan Avenue to be served by existing EMWD connections. Impacts associated with the relocation or construction of new or expanded water facilities would be less than significant.

The EMWD also provides wastewater to the City of Perris and currently treats approximately 43 million gallons per day of wastewater at its four active regional water reclamation facilities throughout Riverside County through 1,813 miles of sewer pipelines.<sup>63</sup> The proposed project would be served by the Perris Valley Regional Water Reclamation Facility (PVRWRF), located approximately 12.70 miles southeast of the project site. The PVRWRF is the largest of four operating plants which receives 128 million gallons per day (mgd) of sewage combined. The plant produces tertiary-treated water and can store more than 2 billion gallons of recycled water for use by surrounding agricultural, sports fields, parks, and landscape customers.

In March 2014, the EMWD completed the most recent expansion of the PVRWRF. With an ultimate capacity of 100 mgd, the facility is poised to meet the current and future demands of the region as well as help to meet the increasing demand for recycled water throughout the EMWD's service area.

Before the expansion, its capacity was 14 mgd and typical daily flows were 12 mgd. The \$180 million expansion took seven years to complete and is the largest capital improvement project in the EMWD's history. The most recent expansion allows the EMWD to not only meet the projected demands of anticipated development in the region, but also to meet more stringent environmental requirements for wastewater treatment and recycled water quality.<sup>64</sup> Utilizing an industrial sewage generation rate of 20 gallons per day (gpd) per 1,000 square feet of warehouse uses and 150 gpd of office uses,<sup>65</sup> the proposed project would result in 3,632gpd<sup>66</sup> of wastewater. Wastewater generated by the proposed project would not represent a significant increase in daily flows at the PVRWRF. Therefore, the proposed project would not require the relocation or construction of new or expanded wastewater treatment facilities. Impacts would be less than significant.

<sup>62</sup> Eastern Municipal Water District (EMWD). Water Supply. Website: <https://www.emwd.org/water-supply>. Accessed April 15, 2022.

<sup>63</sup> Eastern Municipal Water District (EMWD). Wastewater Service. Website: <https://www.emwd.org/wastewater-service>. Accessed April; 15, 2022.

<sup>64</sup> Ibid.

<sup>65</sup> City of Los Angeles. 2006. CEQA Thresholds Guide. Exhibit M.2-12, Sewage Generation Factors. Website: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf>. Accessed May 24, 2022.

<sup>66</sup> (165,371 square foot warehouse + 2,500 square foot mezzanine)/1,000 square feet x 500 gallons per day (gpd) = 82,685.53,257.42  
2,500 square foot office/1,000 square feet x 150 gpd = 375 3,257 + 375 = 3,632

## Stormwater

The proposed project would install curb and gutter improvements, four catch basins, underground piping, and an underground detention system under the northern portion of the project site. The proposed project would also install modular wetland treatment device at the northeast corner of the project site. Stormwater runoff from the building roof would be captured via roof drains/downspouts and conveyed underground to connect to the overall drainage system. Runoff from the roof, detention system, and treatment device would be discharged into the existing public storm drain system at the curb face along Brennan Avenue.

Additionally, underground pipe structures would be installed to replace the open channel on the north side of the proposed project frontage and would connect to the existing storm drain along Ramona Expressway.

As indicated in the Hydrology Study prepared for the project by DRC Engineering, Inc., the proposed flow rate would increase by 0.47 percent compared to the existing flow are of the site. This peak flow increase is considered negligible, and detention for hydrologic mitigation is not required. The proposed project would improve storm drain facilities and maintain existing downstream drainage patterns and would not require the relocation or construction of stormwater drainage facilities. Therefore, impacts would be less than significant.

## Electric Power

The proposed project is located in a developed area of the City of Perris and surrounded by existing development. The proposed project would connect to existing power lines located in the project vicinity. Therefore, the proposed project would not require the relocation or construction of new or expanded electric power facilities. Therefore, impacts would be less than significant.

## Natural Gas

The proposed project would connect to existing natural gas lines located in the project vicinity. The proposed project would not require the relocation or construction of new or expanded natural gas facilities. Therefore, impacts would be less than significant.

## Telecommunications

The proposed project would utilize existing telecommunications infrastructure within the project area. Therefore, impacts would be less than significant. The proposed project would not require the relocation or construction of new or expanded telecommunications facilities. Therefore, impacts would be less than significant.

As mentioned above, the proposed project would not require the relocation of construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Therefore, impacts would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

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

**Less than significant impact.** As discussed above, the proposed project would result in a demand of approximately 3,800 gallons of potable water per day. Table 18 below from the 2020 EMWD Urban Water Management Plan (UWMP)<sup>67</sup> depicts projected water demand and water supply for retail and wholesale customers through the year 2045 for the City of Perris by use.

**Table 18: Projected Demand for Potable and Raw Water**

Use Type	Additional Description	Projected Water Use				
		2025	22030	2035	2040	2045
Single-family	–	66,900	71,700	76,700	80,500	84,000
Multi-family	–	8,500	9,100	9,700	10,200	10,600
Commercial	–	6,100	6,500	7,000	7,300	7,600
Industrial	–	600	600	700	700	700
Institutional/Governmental	–	2,700	2,900	3,100	3,200	3,400
Landscape	–	8,400	7,600	6,800	6,200	5,500
Agricultural Irrigation	Potable Water	1,500	1,500	1,500	1,500	1,500
Agricultural Irrigation	Raw Water	500	500	500	500	500
Other	–	0	0	0	0	0
Non-Revenue	System losses and unbilled, authorized consumption	7,400	7,900	8,400	8,800	9,200
<b>Total:</b>		<b>102,600</b>	<b>108,300</b>	<b>114,400</b>	<b>118,900</b>	<b>123,000</b>
<p>Notes: EMWD = Eastern Municipal Water District  <sup>1</sup> Passive water savings due to the provisions outlined in the Administrative Code are included in the demand projections for EMWD’s retail service area.  <sup>2</sup> Landscape demands remain constant/decrease over time as landscape accounts are offset by conversion to the recycled water system.  <sup>3</sup> Projections for losses in the table include system losses (real and apparent) and unbilled, authorized consumption.                      Source: Eastern Municipal Water District (EMWD). 2020. 2020 Urban Water Management Plan (UWMP). Website: <a href="https://www.emwd.org/sites/main/files/file-attachments/urbanwatermanagementplan_0.pdf?1625160721">https://www.emwd.org/sites/main/files/file-attachments/urbanwatermanagementplan_0.pdf?1625160721</a>. Accessed April 15, 2022.</p>						

The 2020 UWMP indicates that the EMWD would have sufficient supplies to meet retail and wholesale demands from 2020 to 2045 under average year, normal year, single dry year, and multiple dry year conditions. During dry periods, the EMWD would be able to utilize stored groundwater from the EMWD’s Enhanced Recharge and Recovery Program (ERRP), which is currently

<sup>67</sup> Eastern Municipal Water District (EMWD). 2020. 2020 Urban Water Management Plan (UWMP). Website: [https://www.emwd.org/sites/main/files/file-attachments/urbanwatermanagementplan\\_0.pdf?1625160721](https://www.emwd.org/sites/main/files/file-attachments/urbanwatermanagementplan_0.pdf?1625160721). Accessed April 15, 2022.



in the process of being developed, or import more water from the MWD to meet demands as needed. Therefore, the EMWD would have the ability to adequately serve the proposed project and impacts would be less than significant.

**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?**

**Less than significant impact.** As discussed above, the EMWD PVRWRF handles and treats approximately 128 mgd of sewage combined and has a capacity of 100 mgd. The proposed project would not result in a significant increase in the daily peak flow at the PVRWRF and would not require the construction or relocation of new or expanded wastewater facilities. Therefore, impacts related to wastewater treatment capacity would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

**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?**

**Less than significant impact.** CR&R Disposal provides solid waste collection services in the City of Perris. Once collected, waste is transported to Perris Materials Recovery Facility at 1706 Goetz Road where recyclable materials are separated from solid wastes. Recyclable materials are sold in bulk and transported for processing and transformation for other uses. Solid wastes are transported to either the El Sobrante Landfill on Dawson Canyon Road in Corona or to the Badlands Landfill on Ironwood Avenue in Moreno Valley.<sup>68</sup>

The El Sobrante Landfill is located east of I-15 and Temescal Canyon Road to the south of the City of Corona and Cajalco Road at 10910 Dawson Canyon Road, approximately 27.56 miles west of the project site. The El Sobrante Landfill has a maximum permitted throughput of 4,700 tons per day, and a remaining capacity of 3,834,470 cubic yards (5,368,258 tons).<sup>69,70</sup>

The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue, approximately 20.53 miles northeast of the project site, and can accessed from State Route (SR) 60 at Theodore Avenue. The Badlands Landfill has a maximum permitted throughput of 4,800 tons per day, and a remaining capacity of 15,748,799 cubic yards (22,048,319 tons) as of 2015.<sup>71,72</sup>

Using an estimated solid waste generation rate of 8.93 pounds per employee per day for industrial uses, the proposed project would generate approximately 607 pounds (or 0.30 tons) of solid waste per day.<sup>73</sup> This would represent a negligible contribution to the daily throughput at both of landfills

<sup>68</sup> City of Perris. General Plan 2030. Draft Environmental Impact Report. Utilities and Service Systems. Solid Waste. Accessed April 15, 2022.

<sup>69</sup> California Department of Resources Recycling and Recovery (CalRecycle). 2019. SWIS Facility/Site Activity Details. El Sobrante Landfill. Website: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2256?siteID=2402>. Accessed April 15, 2022.

<sup>70</sup> 3,834,470 x 1.4 = 5,368,258 tons

<sup>71</sup> California Department of Resources Recycling and Recovery (CalRecycle). 2019. SWIS Facility/Site Activity Details. Badlands Landfill. Website: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367>. Accessed April 15, 2022.

<sup>72</sup> 15,748,799 x 1.4 = 22,048,318.6

<sup>73</sup> California Department of Resources Recycling and Recovery (CalRecycle). Estimated Solid Waste Generation Rates. Industrial Sector Generation Rates. Website: <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>. Accessed April 15, 2022.

that serve the City of Perris. Therefore, the proposed project would not generate 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. Therefore, impacts related to solid waste would be less than significant. No PVCCSP or project-specific mitigation is applicable or required.

**e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?**

**Less than significant impact.** The proposed project would be required to comply with all local, State, and federal regulations regarding the management of solid waste produced as a result of the proposed project, including any applicable hazardous waste. The proposed project's compliance with local, State, and federal guidelines would ensure that impacts remain less than significant.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

No mitigation required.

### Project-specific Mitigation Measures

No mitigation required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.19 Wildfire</b> <i>If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, would the project:</i>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

### Setting

Wildfire represents a significant risk to structures located within the wildland urban interface (WUI), a transitional zone between wildland areas susceptible to high fire hazards, and areas of urban development. The Office of the State Fire Marshal has developed a series of maps depicting the potential wildfire risks for LRA and State Responsibility Areas, including the City of Perris. According to the City of Perris Fire Hazard Severity Zone Map for the LRA,<sup>74</sup> the project site does not lie within an area classified as a fire hazard zone. The nearest fire hazard zone is located over 2 miles south of the project site, to the west of I-215.

If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, would the project:

<sup>74</sup> California Department of Forestry and Fire Protection (CAL FIRE). 2009. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Website: <https://osfm.fire.ca.gov/media/5921/perris.pdf>. Accessed April 5, 2022.

**a) Substantially impair an adopted emergency response plan or emergency evacuation plan?**

**No impact.** As discussed above, the project site is not located within a fire hazard zone. Therefore, no impacts associated with wildfire would occur. No PVCCSP or project-specific mitigation is applicable or required.

**b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

**No impact.** As discussed above, the project site does not lie within an area classified as a fire hazard zone. Therefore, no impacts associated with wildfire would occur. No PVCCSP or project-specific mitigation is applicable or required.

**c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

**No impact.** As discussed above, the project site is not located within a fire hazard zone. Therefore, no impacts associated with wildfire would occur. No PVCCSP or project-specific mitigation is applicable or required.

**d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

**No impact.** As discussed above, the project site is not located within a fire hazard zone. Therefore, no impacts associated with wildfire would occur. No PVCCSP or project-specific mitigation is applicable or required.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

No mitigation required.

### Project-specific Mitigation Measures

No mitigation required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.20 Mandatory Findings of Significance</b>				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

- a) **Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory? -**

**Less than significant with mitigation incorporated.** Implementation of mitigation as outlined in this Draft IS/MND would reduce all potentially significant impacts to less than significant. Given that all impacts to a less than significant level with mitigation and given the proposed project’s size, the incremental effects of the proposed project are not considerable relative to the effects of past, current, and probable future projects. Therefore, the proposed project would not result in cumulatively considerable impacts, and impacts would be less than significant with mitigation incorporated.

- 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)?**

**Less than significant with mitigation incorporated.** The proposed project may result in impacts associated with air quality, biological resources, cultural resources, geology and soils, GHG emissions, and hazards and hazardous materials that would be significant if left unmitigated. Implementation of the mitigation measures outlined in this Draft IS/MND would reduce all impacts to a less than significant level. The proposed project is being developed according to the PVCCSP and is a consistent and an allowed use under the PVCCSP Light Industrial land use designation. The analysis contained in the PVCCSP EIR determined that development associated with the PVCCSP may have cumulatively significant impacts in the following areas:<sup>75</sup>

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

The proposed project is consistent with local and regional plans, and its air quality emissions do not exceed established thresholds of significance. The proposed project would not cause a substantial increase in ambient noise levels or a significant increase in traffic volumes within the surrounding area.

Although the impacts of the proposed project would be less than significant with the mitigation measures outlined in this Draft IS/MND, the project would also be subject to all of the applicable PVCCSP EIR mitigation measures as identified in this IS/MND, which would further ensure that any contribution to cumulative impacts resulting from implementation of the proposed project would be minimized. Therefore, with implementation of project-specific and PVCCSP EIR mitigation measures, potential cumulative impacts would be less than significant.

- c) **Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?**

**Less than significant impact with mitigation incorporated.** As described throughout the preceding checklist portion of this Draft IS/MND, the proposed project would not have any substantial environmental effects on human beings, either directly or indirectly. All impacts identified throughout this document either do not require mitigation or would be mitigated to levels that are less than significant. In addition, the proposed project would be required to comply with existing regulations as discussed throughout the Draft IS/MND. The proposed mitigation measures, once

<sup>75</sup> City of Perris. Perris Valley Commerce Center Specific Plan (PVCCSP) Draft Environmental Impact Report. Page 5.0-12 through 5.0-13, Unavoidable Adverse Impacts. Accessed August 29, 2022.

implemented, and compliance with existing regulations would ensure that no substantial adverse effects on human beings would result from the proposed project. Therefore, impacts would be less than significant with mitigation incorporated.

## Mitigation Measures

### Applicable PVCCSP Mitigation Measures

The proposed project is required to comply with the following applicable mitigation measures from the PVCCSP EIR.

MM Air 2, MM Air 3, MM Air 4, MM Air 5, MM Air 6, MM Air 7, MM Air 8, MM Air 9, MM Air 11, MM Air 12, MM Air 13, MM Air 14, MM Air 19, MM Air 20, MM Bio 1, MM Bio 2, MM Haz 1, MM Haz 2, MM Haz 3, MM Haz 4, MM Haz 5, MM Haz 6, MM Noise 1, MM Noise 2, MM Noise 3, MM Noise 4, MM Trans 1, MM Trans 2, MM Trans 3, MM Trans 5, and MM Trans 7.

### Project-specific Mitigation Measures

MM AES-1, MM BIO-1, MM BIO-2, MM BIO-3, MM BIO-4, MM BIO-5, MM BIO-6, MM BIO-7, MM CR-1, MM CR-2, MM GEO-1, MM GEO-2, MM GHG-1, MM GHG-2, MM GHG-3, MM HAZ-1, MM TRANS-1, MM TRANS-2, and MM TRANS-3.

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