Initial Study/Mitigated Negative Declaration No. 2394

FIRST INDUSTRIAL LOGISTICS AT SINCLAIR STREET PROJECT

DPR 22-00027

Lead Agency:

City of Perris
101 N. D Street
Perris, California 92570

February 16, 2024

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ACRONYMS LIST

Acronym	Definition
AB 32	Assembly Bill 32
AB 52	Assembly Bill 52
ADA	American Disabilities Act
AICUZ	Air Installation Compatible Use Zone Study
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
APN	Assessor Parcel Number
APZ	Accident Potential Zone
BMPs	Best Management Practices
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of Perris
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
dBA	A-Weighted Decibels
DIF	Development Impact Fees
DPR	Development Plan Review
EIR	Environmental Impact Report
EMWD	Eastern Municipal Water District
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FTA	Federal Transit Administration
GHG	Greenhouse Gas
I-215	Interstate 215
LID	Low Impact Design
LST	Localized Significance Threshold
MARB	March Air Reserve Base
MARB/IPA	March Air Reserve Base/Inland Port Airport
MLD	Most Likely Descendent
MND	Mitigated Negative Declaration
MRZ	Mineral Resources Zone
MS4	Municipal Separate Storm Water Sewer System
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
$MTCO_2e$	Metric Tons Carbon Dioxide Equivalent
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
ND	Negative Declaration
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
PQP	Public/Quasi-Public
PM-2.5	Particulate Matter Less Than 2.5 Microns in Diameter
PM-10	Particulate Matter Less Than 10 Microns in Diameter
PPV	Peak Particle Velocity

PRIMMP	Paleontological Resource Impact Mitigation Monitoring Program
PVCCSP	Perris Valley Commerce Center Specific Plan
PVCCSP EIR	Perris Valley Commerce Center Specific Plan Environmental Impact Report
RTA	Riverside Transit Agency
RWQCB	Regional Water Quality Control Board
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SSC	Species of Special Concern
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TIA	Focused Traffic Impact Analysis
TUMF	Transportation Uniform Mitigation Fees
USFWS	U.S. Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
WQMP	Water Quality Management Plan

SECTION 1.0 INTRODUCTION

1.1 PURPOSE AND SCOPE

Pursuant to the California Environmental Quality Act (CEQA, *California Public Resources Code,* Sections 21000, et seq.) and the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines, *California Code of Regulations,* Title 14, Sections 15000 et seq.), this Initial Study has been prepared in order to determine whether implementation of the proposed First Industrial Warehouse at Sinclair Street Project (proposed Project) could result in potentially significant environmental impacts that would require the preparation of an Environmental Impact Report (EIR). This Initial Study has evaluated each of the issue areas contained in the checklist provided in Section 5.0 of this document. The objective of this environmental document is to inform City of Perris decision makers, representatives of other affected/responsible agencies, and other interested parties of the potential environmental effects that may be associated with the proposed Project.

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

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

The PVCCSP EIR analyzed the direct and indirect environmental impacts resulting from implementation of development allowed under the PVCCSP. Measures to mitigate, to the extent feasible, the significant adverse project and cumulative impacts resulting from that development are identified in the EIR. In conjunction with certification of the PVCCSP EIR, the City of Perris also adopted a Mitigation Monitoring and Reporting Program and a Statement of Overriding Considerations. Additionally, the PVCCSP includes Standards and Guidelines to be applied to future development projects within the Specific Plan area. The City of Perris requires that future

development projects within the Specific Plan area comply with the required PVCCSP Standards and Guidelines, and the applicable PVCCSP EIR mitigation measures as outlined in the adopted Mitigation Monitoring and Reporting Program, and that these requirements are implemented in a timely manner. Relevant Standards and Guidelines and PVCCSP EIR mitigation measures that are incorporated into the proposed Project are listed in the introduction to the analysis for each topical issue in Section 5.0 and are assumed in the analysis presented.

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

1.2 FINDINGS OF THIS INITIAL STUDY

This Initial Study is based on an Environmental Checklist Form, as suggested in Section 15063(d)(3) of the State CEQA Guidelines and is based on the Environmental Checklist Form provided in Appendix G to the 2023 State CEQA Guidelines. The Environmental Checklist Form is found in Section 5.0 of this Initial Study. It contains a series of questions about the proposed Project for each of the listed environmental topics. The Environmental Checklist Form is used to evaluate whether there are any potentially significant environmental effects associated with implementation of the proposed Project, even with implementation of required PVCCSP Standards and Guidelines and PVCCSP EIR mitigation measures. The explanation for each answer is also included in Section 5.0.

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

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

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

1.3 CONTACT PERSON

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

Mario Arellano, Associate Planner
City of Perris Planning Division
135 North D Street Perris, California 92570
(951) 943-5003, ext. 372

SECTION 2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION AND SETTING

The Project site encompasses approximately 20.2 gross acres of a fully developed lot that contains two existing industrial buildings. The Project site is located at the terminus of Sinclair Street, west of North Perris Boulevard, between Morgan Street and West Rider Street within the City of Perris, Riverside County, California. As shown on **Figure 1 – Vicinity Map** and **Figure 2 – Aerial Map.** The proposed Project site consists of Assessor's Parcel Numbers (APNs) 303-080-012, 303-080-013, and 303-080-015. The Project site is located within Section 7, Township 4 South, Range 3 West, San Bernardino Base and Meridian, on the Perris, California USGS 7.5 Quadrangle Map (Perris Quadrangle) as shown on **Figure 3 – USGS Topographic Map.** The proposed Project also includes a 0.37-acre off-site improvement area within Sinclair Street, east of Perris Boulevard, as identified on **Figure 2.**

The Project site and off-site improvement area is relatively flat and is situated within the Perris Valley with elevations averaging approximately 1,440 feet above mean sea level. The Project site is located at 100 and 200 Sinclair Street and is currently developed with two facilities and associated concrete parking and has City of Perris General Plan land use designation of PVCCSP – Perris Valley Commerce Center Specific Plan, as shown on **Figure 4 – General Plan Land Use** and a PVCCSP land use designation of Light Industrial, as shown on **Figure 5 – Specific Plan Land Use**.

The area surrounding the Project site largely has a PVCCSP land use designation of Light Industrial and is currently dominated by industrial uses and vacant land. Vacant undeveloped land that has an in-progress application for an industrial project is located to the north and east of the Project site and a light industrial warehouse is located to the immediate west of the Project site. The Colorado River Aqueduct is located to the immediate south of the Project site and has a PVCCSP designation of Public/Semi-Public Facility.

The Project site is located on land designated by the California Department of Conservation's Farmland Mapping and Monitoring Program as Urban and Built-up Land.

As further discussed in Section 5.4, Biological Resources of this Initial Study, the Project site and the off-site improvement area are within the jurisdiction of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Mead Valley Plan. The Project site and off-site improvement area are not located within any designated MSHCP "Criteria Area" or "Subunits", and they are not within a "Core" or "Linkage" area. The Project site and off-site improvement area do not fall within any Public/Quasi-Public (PQP) or other MSHCP Conserved Lands.

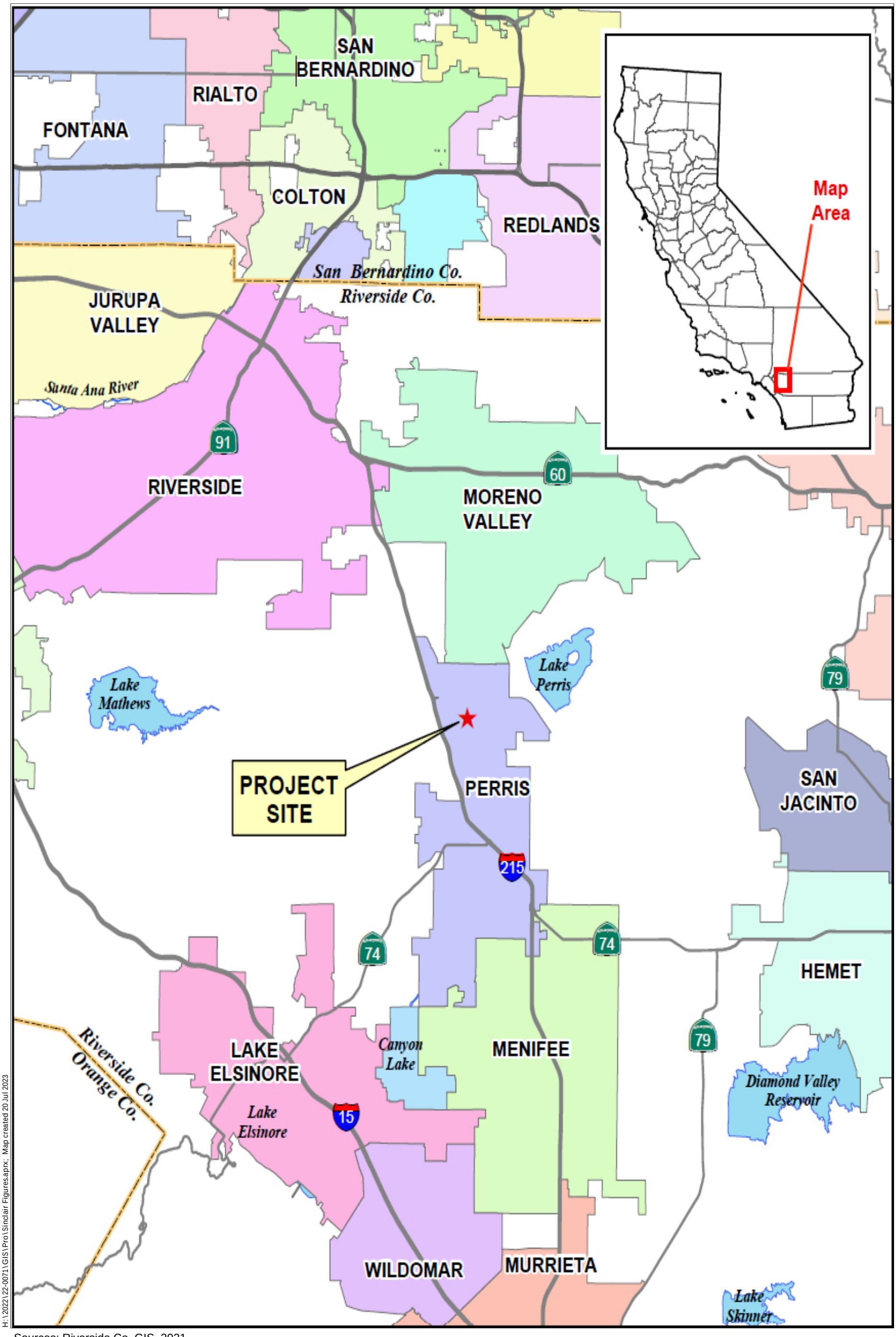
The proposed Project site is located approximately 2 miles southeast of March Air Reserve Base/Inland Port Airport (MARB/IPA) and is subject to the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA ALUCP.) The MARB/IPA ALUCP divides the area close to the airport into zones based on proximity to the airport and perceived risks. The proposed Project site is within Airport Overlay B1- APZ II as shown on **Figure 6 – MARB Compatibility Zones**. According to the MARB/IPA ALUCP, Zone B1 is within the Accident Potential Zone (APZ) II within the inner approach and departure zone and the risk level from flight operations is high. Uses that are prohibited in Zone B1 include children's schools, day care centers, libraries, hospitals, congregate care facilities, hotels/motels, restaurants, places of assembly, noise-sensitive outdoor nonresidential uses, and hazards to flight.

Regional access to the Project site is provided via Interstate 215 (I-215) located approximately one mile west of the Project site. Existing roadways surrounding the Project site include Sinclair Street and Perris Boulevard. The PVCCSP roadway designations and current conditions as follows.

- Perris Boulevard is a north-south roadway designed for 128-foot right-of-way and a curb-to-curb width of 94 feet and is classified as an Arterial roadway in the PVCCSP Circulation Plan. Perris Boulevard has been improved to its ultimate width.
- Sinclair Street from Perris Boulevard to Redlands Avenue is an east-west two-lane roadway designed for a 60-foot right-of-way with 40-foot-wide curb-to-curb and is classified as a Local roadway in the PVCCSP Circulation Plan. Sinclair Street is partially improved. Between Perris Boulevard and Johnson Avenue, the northern lane is improved and contains curb and gutter, and streetlights, and sidewalks. The southern lane contains portions of unpaved roadway. Portions of Sinclair Street, west of Perris Boulevard, are within the Metropolitan Water District's easement.

Truck traffic from the PVCCSP planning area currently uses the PVCCSP-designated truck routes, such as Indian Avenue, Morgan Street, Redlands Avenue, Harley Knox Boulevard, and Placentia Avenue to access the I-215 freeway.

The City of Perris is currently served by the Riverside Transit Agency (RTA) Route 41 and Route 19. These routes are located approximately 0.11 mile south of the Project site, near the intersection of Perris Boulevard and Commerce Center Drive.



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Sources: Riverside Co. GIS, 2021

Figure 1 - Vicinity Map

First Industrial Logistics at Sinclair Project

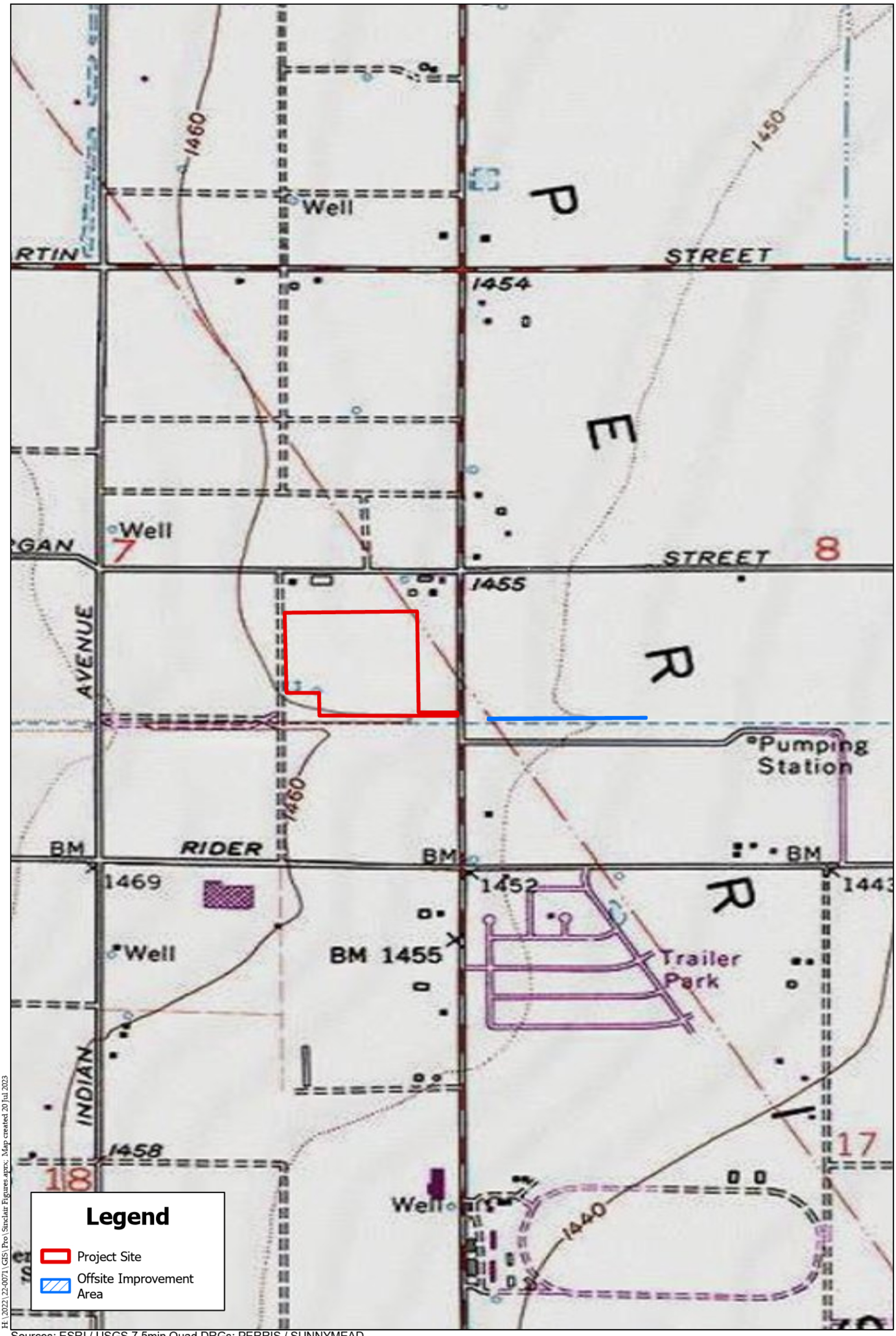
ALBERT A. WEBB ASSOCIATES

Sources: ESRI 2023

Figure 2 - Aerial Map

First Industrial Logistics at Sinclair Project

ALBERT A. WEBB ASSOCIATES



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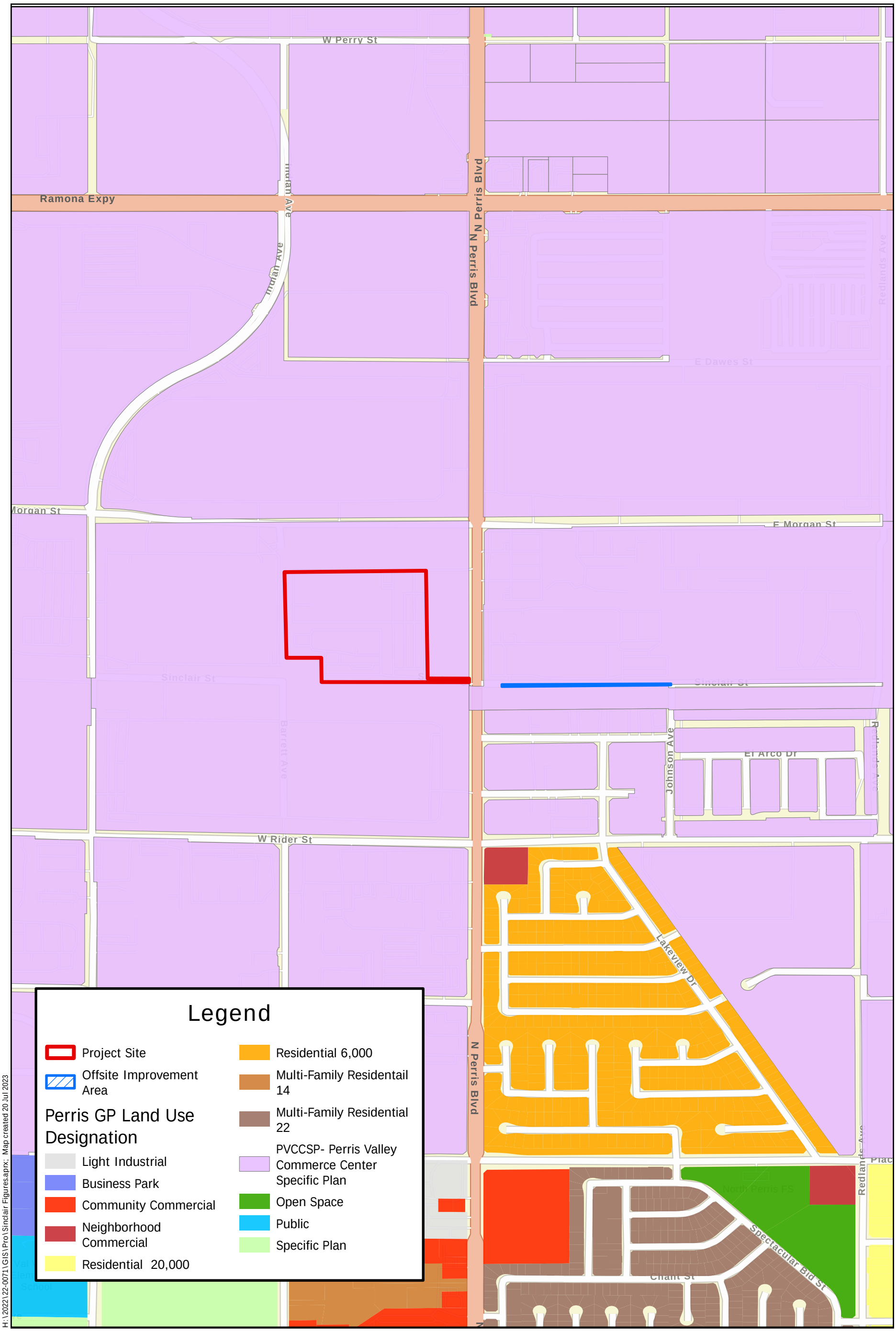
Sources: ESRI / USGS 7.5min Quad DRGs: PERRIS / SUNNYMEAD

Figure 3 - USGS Topographical

First Industrial Logistics at Sinclair Project

ALBERT A. WEBB ASSOCIATES



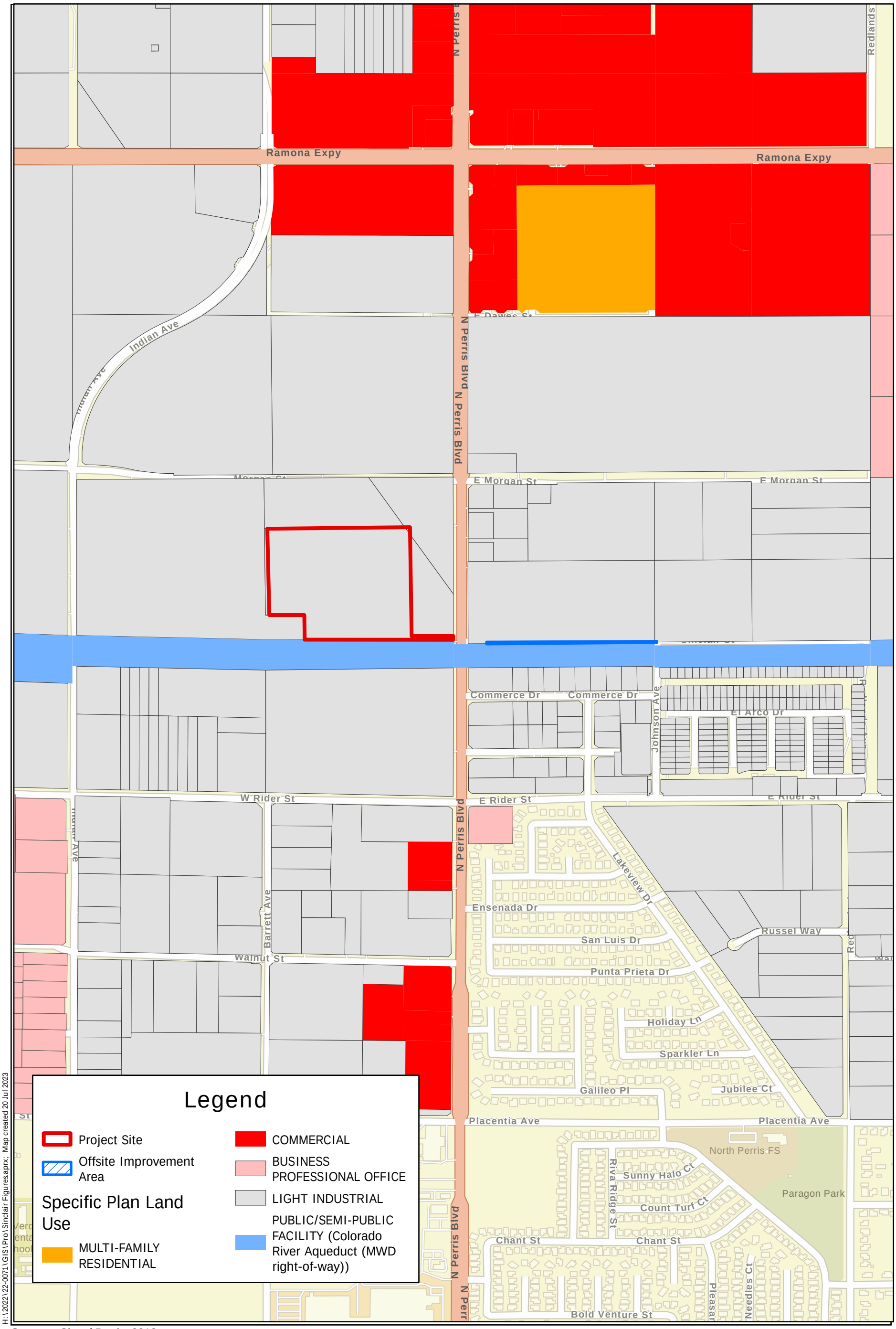
Sources: City of Perris

0 500 1,000 1,500 Feet

Figure 4 - General Plan Land Use

First Industrial Logistics at Sinclair Project

ALBERT A. WEBB ASSOCIATES



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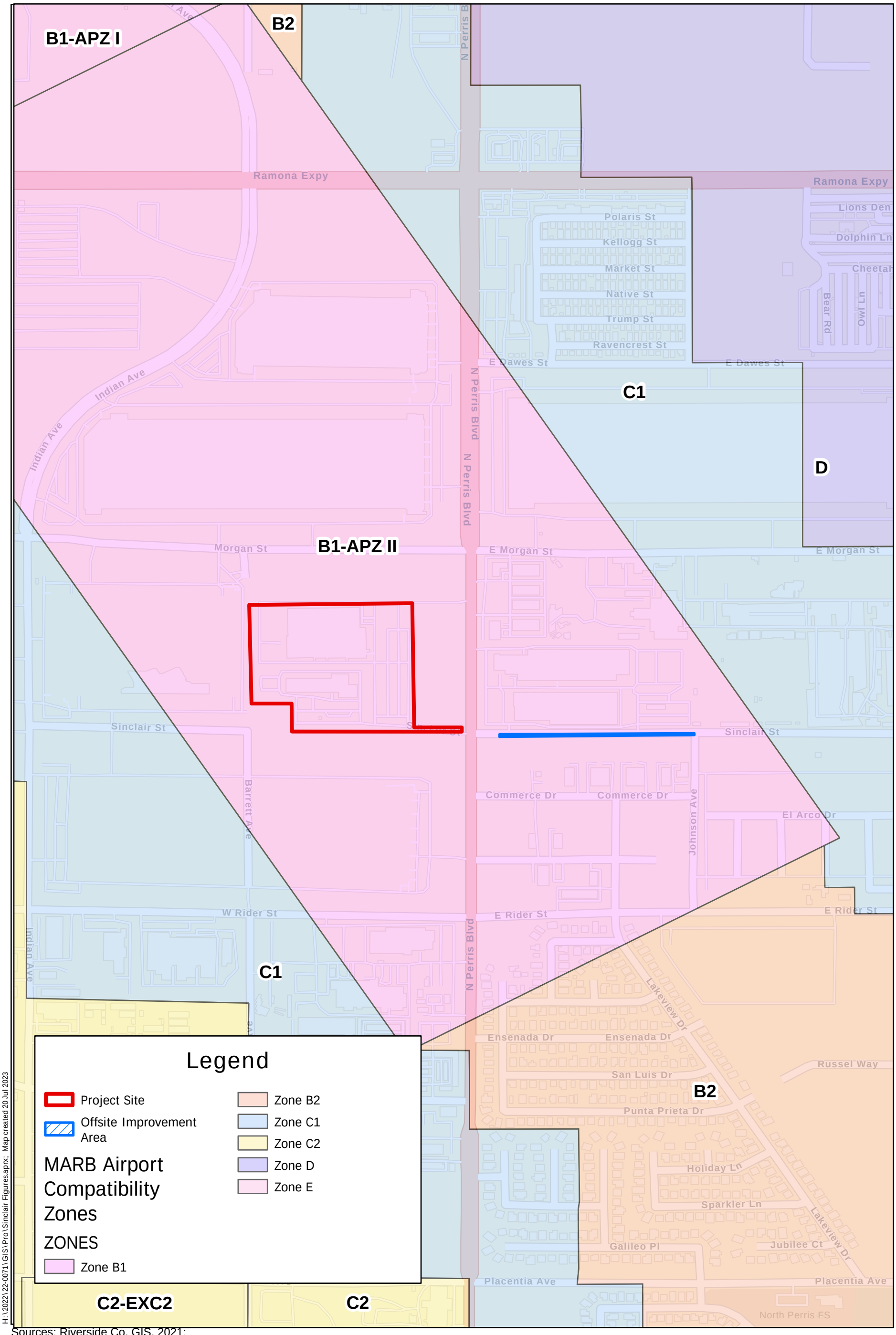
Sources: City of Perris, 2018; Riverside Co. GIS, 2020.

Figure 5 - Specific Plan Land Use

First Industrial Logistics at Sinclair Project

ALBERT A. WEBB ASSOCIATES



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Sources: Riverside Co. GIS, 2021;
USDA NAIP, 2018.

Figure 6 - MARB Compatibility Zone

First Industrial Logistics at Sinclair Project

ALBERT A. WEBB ASSOCIATES

2.2 PROJECT DESCRIPTION

The First Industrial Logistics at Sinclair Street Project and off-site improvement area (collectively referred to as proposed Project or Project) involves the demolition of two existing light industrial buildings totaling 206,100 square feet and the construction and operation of an approximately 427,224-square-foot industrial, non-refrigerated warehouse distribution facility use that includes 4,000 square feet of office and 4,000 square feet of mezzanine space (see **Figure 7 – Proposed Site Plan**). The Project would encompass approximately 20.57 acres, of which approximately 0.37 acre includes offsite improvements.

The proposed warehouse facility would be constructed as a speculative or "spec" building; that is, there is not a specific tenant identified at this time; thus, the exact number of employees once the warehouse is operational is currently unknown. Based on the PVCCSP EIR employment projection rates, the warehouse could employ approximately 418 new employees[1]. As a spec building the hours of operation are unknown; therefore it is assumed that the building could operate 24 hours a day, seven days a week. The warehouse would not include e-commerce uses.

The proposed Project has been designed to comply with the applicable Standards and Guidelines outlined in the PVCCSP, including but not limited to, landscape coverage, building setback, lot coverage, Floor Area Ratio, and outdoor employee amenities requirements as shown on **Figure 7.** The architectural warehouse building elevations are shown on **Figure 8 - Elevations**. The proposed warehouse building would be constructed from concrete tilt-up panels that would be painted according to the City's approved color palette. The warehouse building would feature approximately 70 dock doors with 35 dock doors on the northern side of the building and 35 dock doors on the southern side of the building. Additionally, the Project proponent has committed to achieve LEED "Certified" status for the building.

The proposed warehouse distribution facility is a permitted use consistent with the PVCCSP and the Perris General Plan; therefore, no General Plan Amendment, Specific Plan Amendment, or zone change is required. The approval of Parcel Map (PLN23-05174) would merge APNs 303-080-012, 303-080-013 and 303-080-015 into a single parcel.

Roadways and Access

As shown on **Figure 7**, access to the Project site would be from Sinclair Street via one driveway. This driveway then splits to two drive aisles to access the passenger vehicle parking lot located to the east side of the building and the truck loading docks and truck trailer parking lot located to the south side of the building. The passenger parking lot is next to the warehouse building, to the east of the building, near the office areas. No passenger vehicle parking stalls are located along the trucks' path of travel. The truck loading docks and trailer parking would be accessed from the southern dock entrance that would include a sliding gate with perforated screen mesh and knox-pad lock per fire department standards as shown on **Figure 7**. For fire access, manually operated swing gates with perforated screen mesh and knox-pad lock per fire department standards are proposed along the northeastern side of the building. Per the PVCCSP requirements, the driveway would include decorative concrete driveway entrance.

Automobile and trailer parking would be provided on the site; the number of parking spaces provided would be consistent with the parking requirements outlined in Perris Municipal Code, Chapter 19.69. A total of 126 trailer truck parking stalls would be provided on the south side of the proposed

[1] See Section 5.14, Population and Housing for additional information.

building. A total of 108 auto parking stalls, which includes seven accessible stalls, would be provided along the southern side of the facility. Pursuant to Section 5.106.5.3.3 of the 2022 California Green Building Standards (CCR, Title 24, Part 11 – CalGreen) Code, at least 25 electric vehicle (EV) capable parking spaces would be provided while at least six of these spaces would provide EV chargers. Further, bicycle parking is provided near the proposed office area on the east side of the building.

Project truck traffic is anticipated to access the Project site via Sinclair Street, then travel along Redlands Avenue. Trucks traveling to or from the north would travel along Harley Knox Boulevard to the I-215/Harley Knox Boulevard interchange. Trucks traveling to or from the north would travel along Morgan Street, Indian Avenue, and Placentia Avenue to the I-215/Placentia Avenue interchange. Signage shall be posted at the Project site directing truck drivers to use designated City truck routes to access the I-215 freeway. The information on the signage would be coordinated with City Planning Division and the City's Traffic Engineer during the plan check process.

The PVCCSP Circulation Element designates Sinclair Street, east of Perris Boulevard, as a Local Street. Local Streets within the PVCCSP area are typically 40 feet wide curb-to-curb with at least four feet of sidewalk on both sides depending on the design and traffic volumes to be served. The off-site improvement area would be within Sinclair Street, between Perris Boulevard and Johnson Avenue. The proposed improvements to Sinclair Street, east of Perris Boulevard, would consist of road widening within existing right-of-way that includes the grind and overlay of existing pavement to join proposed new pavement, in accordance with City standards. Traffic signal modifications that include pedestrian call buttons, pedestrian cross walk stripping, and pedestrian access ramps are proposed for pedestrian crossing and connectivity at Perris Boulevard, south of Sinclair Street. No improvements are proposed to Sinclair Street, west of Perris Boulevard, since this road has already been constructed to its ultimate width and is a private street.

Landscaping and Outside Amenities

The Project site would include landscaping, walls, and fences as required for screening, privacy, and security as shown on **Figure 7** and **Figure 9 – Landscape Plan**. The proposed Project would include an 8-foot-high wrought iron tubular fence and 14-foot-high concrete tilt-up screen walls along the Project site's boundary. The truck loading docks would be located on the southern and northern side of the Project site. Truck parking would be located on the southern portion of the Project site. As discussed above, access to the truck yard would be via a proposed a sliding gate with perforated screen mesh and knox-pad lock per fire department standards. The Project site also includes approximately 88,689 square feet of landscaping and two bioretention basins system. Landscaping would be provided along the walls and fencing on the east and south sides of the Project site; and adjacent to portions of the north, west, south, and east sides of the proposed building. The Project would include shade trees in pursuant to CalGreen Code Section 5.106.12 Shade Trees. Two underground chambers facilities would be located in the Project site near the southerly loading dock area, as shown in **Figure 8**. No landscaping to the offsite improvement area is required or proposed.

The outside employee amenities would be located on the eastern portion of the Project site and would include a bocce court and a concrete covered lunch patio area with landscape furniture. (Refer to **Figure 7**).

Storm Drain and Other Facilities

The Project would include a combination of inlets, subsurface storm drain system, above ground retention basins, underground retention and detention chambers, and a storm water lift station to collect, convey, and treat flows from the Project site. These flows would be conveyed via the existing arch reinforced concrete pipe located on the middle portion of the eastern boundary to the

corrugated metal pipe arch, that crosses under Perris Boulevard pipe, and into the Perris Valley Master Drainage Plan (MDP) Lateral G-2. MDP Lateral G-2 drains to the Perris Valley Storm Drain, which connects to the San Jacinto River and ultimately to the Lake Elsinore Basin. The Project would be designed to direct flows to meet the 100-year event levels that are at or below current flow conditions of 21.5 cubic feet per second and that the flows do not exceed the design flow rate of 21.5 cubic feet per second for the existing outlet pipes.

Potable water service to the Project site would continue to be provided by the Eastern Municipal Water District (EMWD) via an existing 12-inch diameter waterline in Sinclair Street. The closest recycled water facilities are in E. Morgan Street and Redlands Boulevard, more than 400 feet from the Project site. Due to distance, recycled water lines are not proposed. Sewer service to the Project site would continue to be provided by an existing connection located at the southwest corner of the Project site. There would also be a diesel-powered fire flow pump that would be used for fire flow demands that would be in the fire pump house near the southern passenger vehicle parking area. The fire flow pump would only be used during fire emergencies and routine testing and would not be part of the Project's normal daily operations.

The Project would include the undergrounding of the existing power poles along Sinclair Street. Any relocation of existing pipelines and associated appurtenances and an existing streetlight would be within the existing right-of-way.

Construction Phasing

Prior to construction of the proposed Project, the existing structures and pavement at the Project site would be demolished and the material would be reused. Additionally, the proposed Project would be constructed in a single phase and the earthwork would require approximately 89,100 cubic yards of soil import. (See **Figure 10 – Proposed Grading Plan**). Construction is expected to commence in 2024 and be completed over a period of approximately 11 months. The Project applicant indicated that on-site concrete pouring activities could occur at night to allow the concrete to set properly. Concrete pours would typically start at 1:00 a.m.

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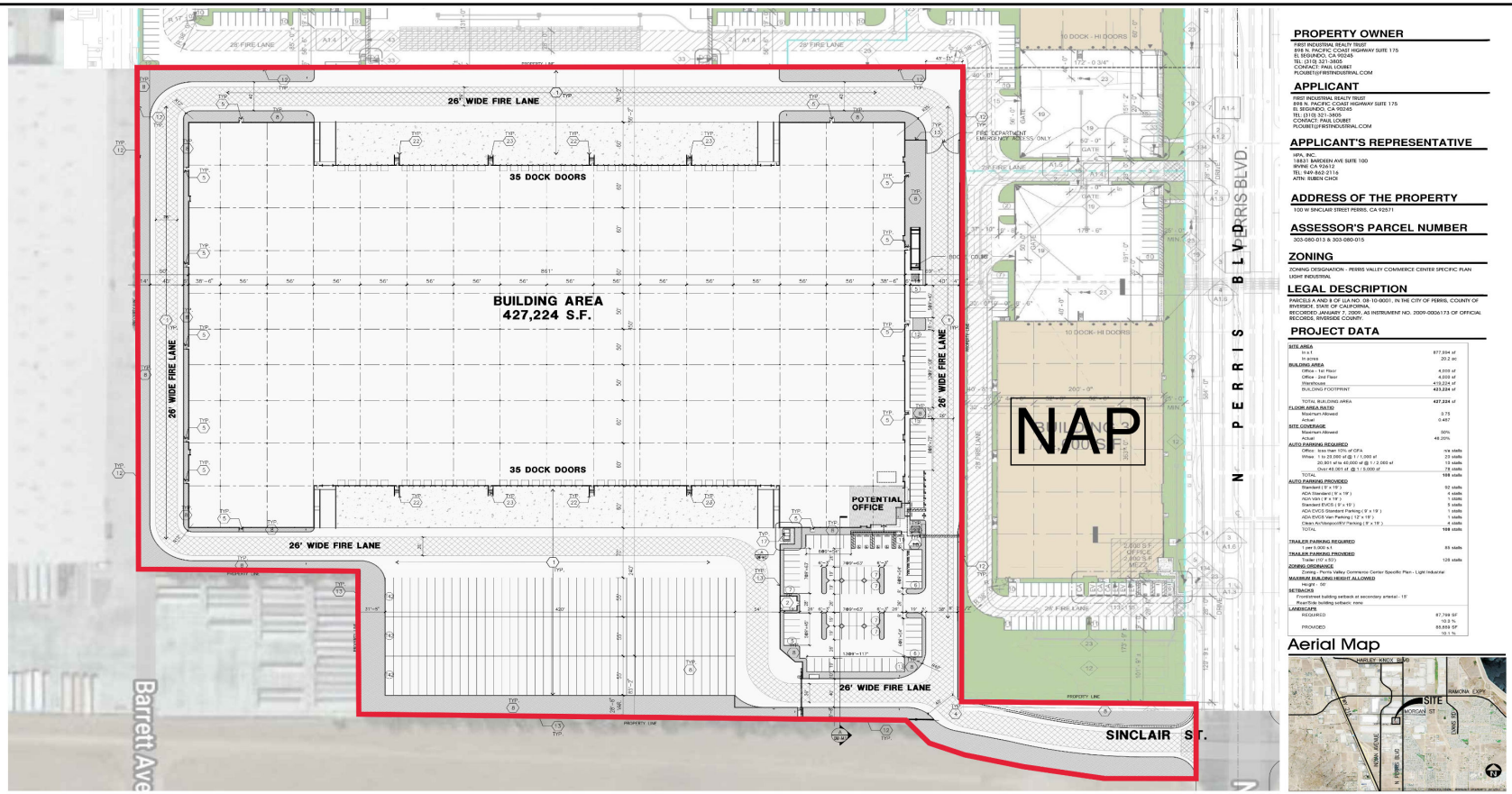


OVERALL SITE PLAN
scale: 1" = 50'-0"

SCALE: 1" = 50'-0"
0 50 100' 150'
TRUE NORTH

PROPERTY OWNER

FIRST INDUSTRIAL REALTY TRUST
898 N. PACIFIC COAST HIGHWAY SUITE 175
EL SEGUNDO, CA 90245
TEL: (310) 321-3805
CONTACT: PAUL LOUBET
PLOUBET@FIRSTINDUSTRIAL.COM

APPLICANT

FIRST INDUSTRIAL REALTY TRUST
898 N. PACIFIC COAST HIGHWAY SUITE 175
EL SEGUNDO, CA 90245
TEL: (310) 321-3805
CONTACT: PAUL LOUBET
PLOUBET@FIRSTINDUSTRIAL.COM

APPLICANT'S REPRESENTATIVE

HPA, INC.
18831 BARDEEN AVE SUITE 100
IRVINE CA 92612
TEL: 949-863-2116
ATTN: RUBEN CHOI

ADDRESS OF THE PROPERTY

100 W SINCLAIR STREET PERRIS, CA 92571

ASSESSOR'S PARCEL NUMBER

303-080-013 & 303-080-015

ZONING

ZONING DESIGNATION - PERRIS VALLEY COMMERCE CENTER SPECIFIC PLAN
LIGHT INDUSTRIAL

LEGAL DESCRIPTION

PARCELS A AND B OF LLA NO. 08-10-0001, IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA,
RECORDED JANUARY 7, 2009, AS INSTRUMENT NO. 2009-0006173 OF OFFICIAL RECORDS, RIVERSIDE COUNTY.

PROJECT DATA

SITE AREA	
In s.f.	877,894 sf
In acres	20.2 ac
BUILDING AREA	
Office - 1st Floor	4,000 sf
Office - 2nd Floor	4,000 sf
Warehouse	415,224 sf
BUILDING FOOTPRINT	423,224 sf
TOTAL BUILDING AREA	427,224 sf
FLOOR AREA RATIO	
Maximum Allowed	0.75
Actual	0.487
SITE COVERAGE	
Maximum Allowed	50%
Actual	48.20%
AUTO PARKING REQUIRED	
Office - less than 10% of GFA	n/a stalls
Where 1 to 20,000 sf @ 1 / 1,000 sf	20 stalls
20,001 sf to 40,000 sf @ 1 / 2,000 sf	10 stalls
Over 40,001 sf @ 1 / 5,000 sf	78 stalls
TOTAL	108 stalls
AUTO PARKING PROVIDED	
Standard (9' x 19')	92 stalls
ADA Standard (9' x 19')	4 stalls
ADA VAN (9' x 19')	1 stalls
Standard EVCS (9' x 19')	5 stalls
ADA EVCS Standard Parking (9' x 19')	1 stalls
ADA EVCS Van Parking (12' x 19')	1 stalls
Clean Air/Vanpool/EV Parking (9' x 19')	4 stalls
TOTAL	108 stalls
TRAILER PARKING REQUIRED	
1 per 5,000 s.f.	85 stalls
TRAILER PARKING PROVIDED	
Trailer (10' x 50')	126 stalls
ZONING ORDINANCE	
Zoning - Perris Valley Commerce Center Specific Plan - Light Industrial	
MAXIMUM BUILDING HEIGHT ALLOWED	
Height - 50'	
SETBACKS	
Front/street building setback at secondary arterial - 15'	
Rear/side building setback: none	
LANDSCAPE	
REQUIRED	87,789 SF
	10.3 %
PROVIDED	88,869 SF
	10.1 %

Aerial Map

SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONC. PAVEMENT.
2. PUMP HOUSE.
3. CONCRETE WALKWAY
4. ENHANCED DRIVEWAY APRONS TO BE CONSTRUCTED PER "L" DRAWINGS.
5. 5'-4"X5'-4"X4" MIN. THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. SLOPE TO BE 1/4" X 1'-0" MAX. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY W/ 1:20 MAX AS REQ. BY CITY INSPECTOR.
6. PROVIDE METAL, MANUAL OPERATED SLIDING GATES W/ PERFORATED SCREEN MESH & KNOX-PAD LOCK PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
7. PROVIDE METAL, MANUAL OPERATED SWING GATES W/ PERFORATED SCREEN MESH & KNOX-PAD LOCK PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
8. LANDSCAPE. SEE "L" DWGS.
9. CONCRETE TILT-UP SCREEN WALL
10. BIKE RACK.
11. APPROXIMATE LOCATION OF TRANSFORMER.
12. 6'H WROUGHT IRON FENCE.
13. 14' H SCREEN WALL WITH ANTI GRAFFITI COATING
14. ELECTRICAL ROOM
15. PROPOSED SITE LIGHT POLE.
16. PROPOSED STREET LIGHT
17. TRASH ENCLOSURE PER CITY STANDARD.
18. PROPOSED FIRE HYDRANT
19. HANDICAPPED PARKING STALL SIGN
20. HANDICAPPED ENTRY SIGN
21. PRE-CAST CONC. WHEEL STOP
22. CONC. FILLED GUARD POST "S DIA. U.N.O. 42" H.
23. EXTERIOR CONC. STAIR.
24. FUTURE INDOOR EMPLOYEE BREAK AREA
25. COLOR CONCRETE WITH SCORING LINES AT TRUCK DRIVEWAY
26. EMPLOYEE BREAK AREA WITH PICKLE BALL
27. EMPLOYEE BREAK AREA WITH CANOPY AND TABLE
28. FUTURE INDOOR EMPLOYEE BREAK AREA
29. AUTOMATIC BOOM BARRIER-DOUBLE GATE
30. PROPOSED 8' CLASS I MULTIPURPOSE PATH
31. 3' WIDE WI SWING GATE W/LOCKSET
32. 6' WIDE WI SWING GATE W/LOCKSET

SITE LEGEND

- LANDSCAPED AREA
- SITE PAVING – SEE "C" DRWGS. FOR THICKNESS
- CONCRETE PAVING SEE "C" DRWGS. FOR THICKNESS
- STANDARD PARKING STALL (9' X 19')
- HANDICAP PARKING STALL (9' X 19')
- 26' FIRE LANE.
- Project Site
- LIGHT STANDARD
- EXISTING PUBLIC FIRE HYDRANT
- PRIVATE FIRE HYDRANT– APPROXIMATE LOCATION
- PROPERTY LINE
- PATH OF TRAVEL
- TRUCK IN & OUT

SITE PLAN GENERAL NOTES

1. THE SOILS REPORT PREPARED BY _____ SHOULD BE A PART OF THESE CONTRACT DOCUMENTS.
2. IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM, PRIOR TO INSTALLATION & AT LEAST 60 DAYS BEFORE BLDG. COMPLETION.
6. SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS.
8. CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. SEE "L" DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA WAY W/ 1:20 MAX. SLOPE. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". SEE "L" DRAWINGS FOR FINISH.
11. PROVIDE TWO FIRE HYDRANT ON THE SITE. FINAL LOCATION WILL DETERMINATE IN DURING SUBMITTAL.
12. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
13. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
14. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
15. NOT USED
16. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
17. NOT USED
18. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB
19. APPROVED CONCEPTUAL LANDSCAPE PLAN PRIOR TO GRADING PERMIT

\\brkpan01.webb.lan\WO4\2022\22-0071\GIS\Pro\Pro Files\Sinclair Figures.aprx Map created 28 Nov 2023

Source: HPA Architecture, Overall Site Plan, June 2, 2023.

Figure 7 - Proposed Site Plan

First Industrial Logistics at Sinclair Project

ALBERT A. WEBB ASSOCIATES

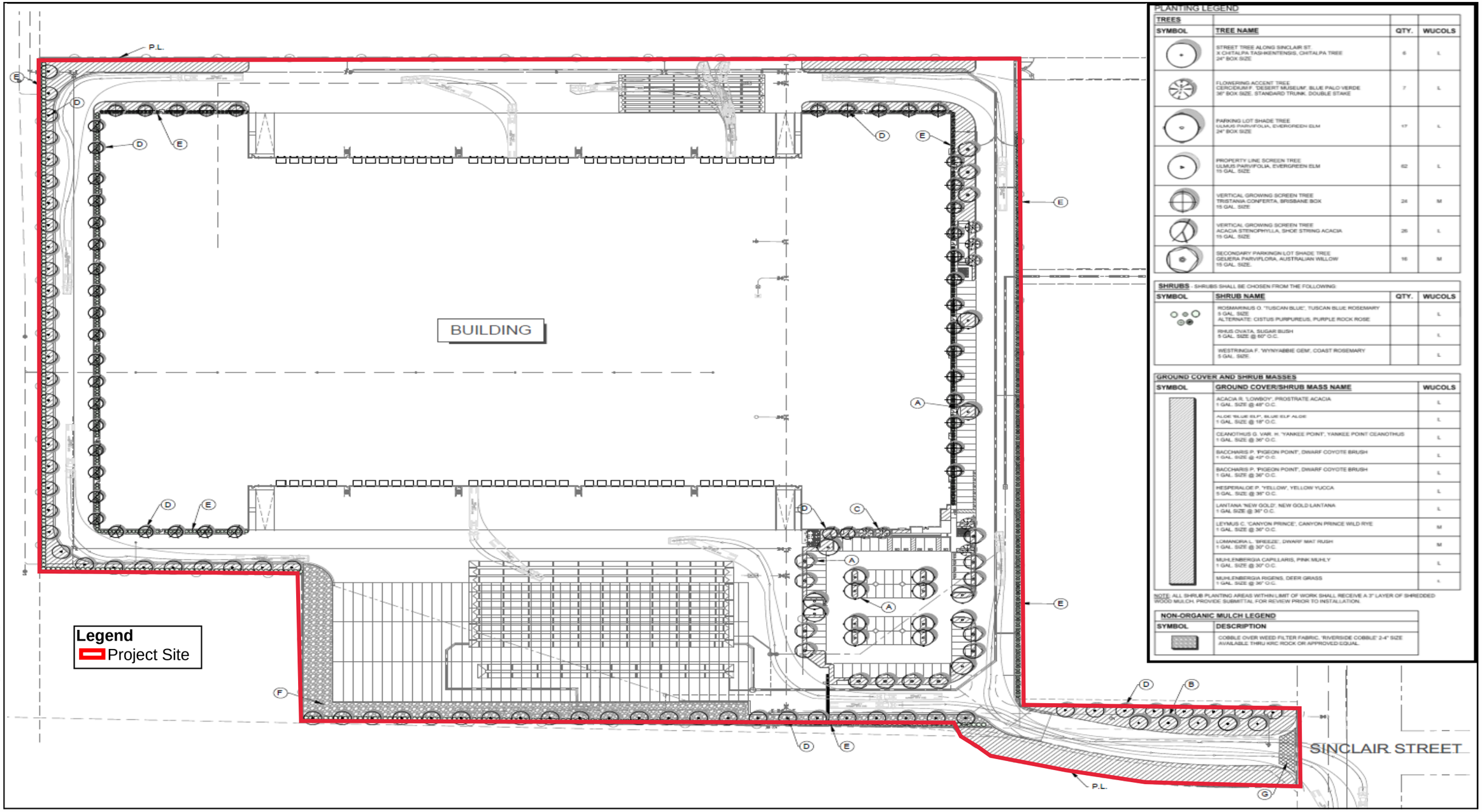
H:\2022\22-0071\GIS\Pro\Sinclair Figures.aprx Map created 23 Jul 2023

Source: HPA Architecture

Figure 8 - Elevations

First Industrial Logistics at Sinclair Project

ALBERT A. WEBB ASSOCIATES



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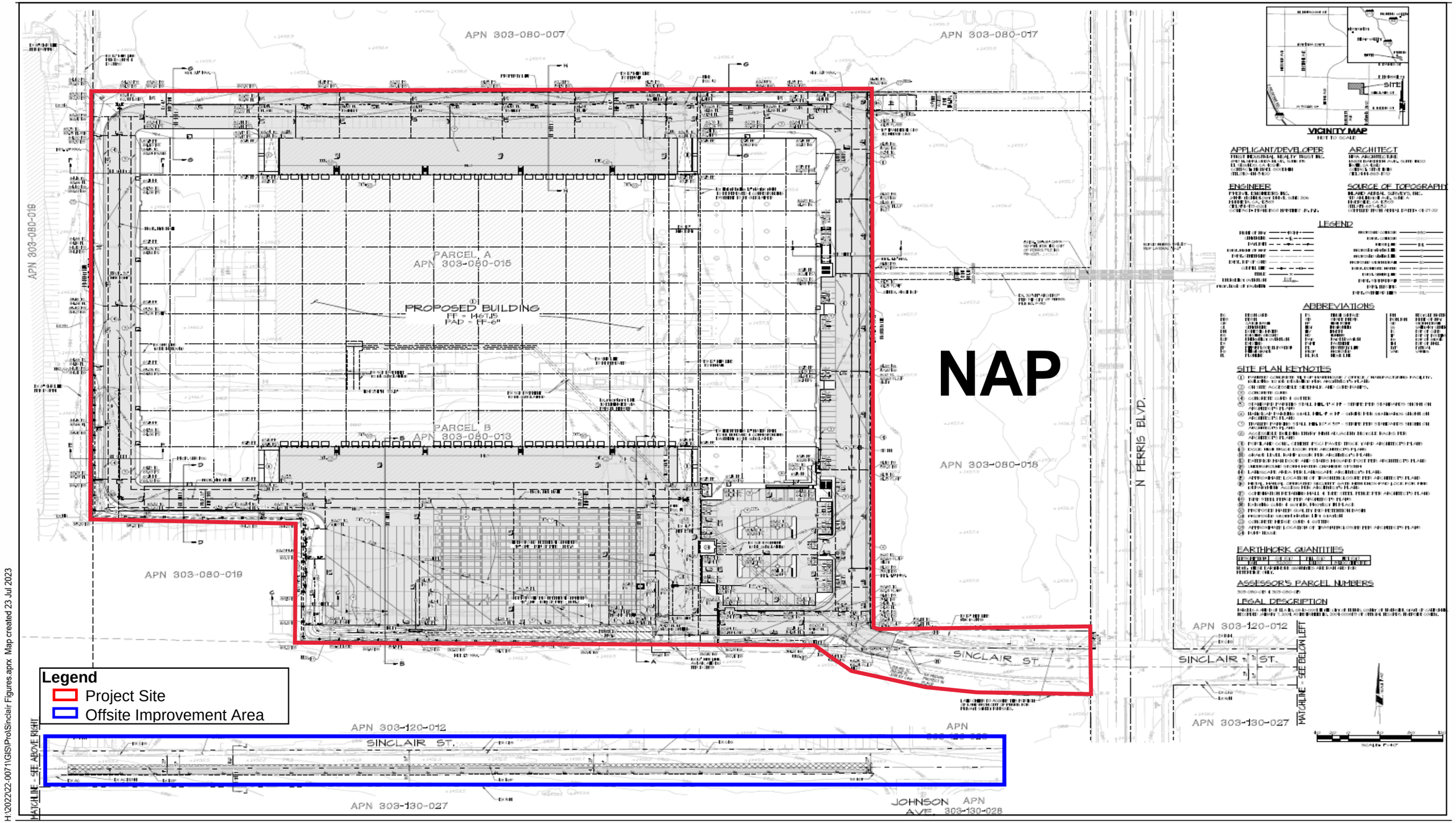
Source: HPA Architecture

Figure 9 - Landscape Plan
First Industrial Logistics at Sinclair Project

ALBERT A. WEBB ASSOCIATES



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Source: HPA Architecture

Figure 10 - Proposed Grading Plan
First Industrial Logistics at Sinclair Project

ALBERT A. WEBB ASSOCIATES

2.3 PROJECT APPROVALS

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

- Adopt a Mitigated Negative Declaration (MND) with the determination that the MND has been prepared in compliance with the requirements of CEQA;
- Approve Parcel Map (PLN 23-050174) to merge the three existing site parcels into one parcel;
- Accept dedication of the southern half of Sinclair Avenue within the offsite improvement area (generally between Perris Boulevard and Johnson Avenue; and
- Approve Development Plan Review (DPR 22-00027) to allow the development of the approximately 20.2-acre Project site with an approximately 427,224-square-foot industrial, non-refrigerated warehouse distribution facility use that includes 4,000 square feet of office space on the first floor and an additional 4,000 square feet of office space on a second floor.

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

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

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

- An easement from the Metropolitan Water District of Southern California (Metropolitan) for use of a Metropolitan-owned property for a private street to access the Project site. Specifically, the portion of Sinclair Street, west of Perris Boulevard.
- A National Pollutant Discharge Elimination System (NPDES) permit from the Santa Ana Regional Water Quality Control Board (RWQCB) to ensure that construction site drainage velocities are equal to or less than the pre-construction conditions and downstream water quality is not worsened.
- Approval of water and sewer improvement plans by the Eastern Municipal Water District.
- Compliance with the South Coast Air Quality Management District Indirect Source Rule (Rule 2305) for warehouse owners and operators and a permit to operate a diesel fueled fire flow pump.

2.4 DOCUMENTS INCORPORATED BY REFERENCE

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

- *Perris Comprehensive General Plan 2030,* City of Perris, originally approved on April 26, 2005 (GP). (Available at https://www.cityofperris.org/departments/development-services/general-plan)
- *Perris General Plan 2030 Draft Environmental Impact Report, SCH No. 2004031135,* certified April 26, 2005 (GP EIR). (Available at Available at https://www.cityofperris.org/home/showpublisheddocument/451/637203139698630000.)

- *Perris Valley Commerce Center Specific Plan Amendment No. 14*, approved January 11, 2023 (Ordinance 1414) (PVCCSP). (Available at City Planning Department.)
- *Perris Valley Commerce Center Final Environmental Impact Report, SCH 2009081086*, July 2011, certified January 10, 2012 (PVCCSP EIR). (Available at https://www.cityofperris.org/Home/ShowDocument?id=13874 and https://www.cityofperris.org/Home/ShowDocument?id=13876.)

These reports/studies are also available for review at:

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

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

SECTION 3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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.

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

SECTION 4.0 DETERMINATION

On the basis of this initial evaluation:

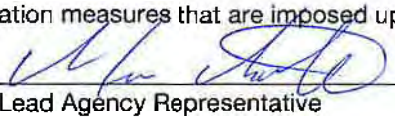
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION would be prepared.

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

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

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

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



Signature of Lead Agency Representative — Date: 2/12/24

Mario Arellano, Associate Planner — Printed name

City of Perris — Agency

SECTION 5.0 INITIAL STUDY

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

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

ENVIRONMENTAL CHECKLIST FORM

City of Perris **135 North "D" Street, Perris,** **California 92570**	
Project Title	First Industrial Logistics at Sinclair Street Case No. DPR 22-00027
Lead Agency Name and Address	City of Perris 101 North D Street Perris, CA 92570
Contact Person and Phone Number	Mario Arellano, Associate Planner City of Peris Planning Division 135 N. D Street, Perris, CA 92570 (951) 943-5003 ext 372
Project Location	The Project site encompasses approximately 20.2 on-site gross acres located at 100 and 200 Sinclair Street at the terminus of Sinclair Street, west of North Perris Boulevard Avenue, between Morgan Street and West Rider Street, within the City of Perris, California as shown on **Figure 1 – Vicinity Map** and **Figure 2 – Aerial Map**. The proposed Project site consists of Assessor's Parcel Numbers (APNs) 303-080-012, 303-080-013 and -015). The Project site is in Section 7 Township 4 South, Range 3 West of the San Bernardino Baseline and Meridian, identified on the Perris, California USGS 7.5 Quadrangle Map (Perris Quadrangle) as shown on **Figure 3 – USGS Topographical Map**. The proposed Project also includes a 0.37-acre off-site improvement area within Sinclair Street, east of Perris Boulevard as shown on **Figure 2**.
Project Sponsor's Name and Address	First Industrial Realty Trust Attn: Paul Loubet 898 N Pacific Coast Hwy, Suite 175 El Segundo, CA 90245

<table>
<tr><td>General Plan Designation</td><td>PVCCSP – Perris Valley Commerce Center Specific Plan</td></tr>
<tr><td>Zoning</td><td>Perris Valley Commerce Center Specific Plan (PVCCSP)</td></tr>
<tr><td>Specific Plan Designation</td><td>Light Industrial (LI)</td></tr>
<tr><td>Description of Project</td><td>A detailed Project Description is provided in Section 2.2. This provides a summary of the proposed Project. The First Industrial Logistics at Sinclair Street Project and off-site improvement area (collectively referred to as proposed Project or Project) would involve the demolition of two existing light industrial buildings totaling 206,100 square feet and the construction and operation of an approximate 427,224-square-foot industrial, non-refrigerated warehouse distribution facility use as reflected on Figure 7 – Proposed Site Plan. Additionally, the Project includes 0.37 acre of offsite improvements to Sinclair Street between Perris Boulevard and Johnson Street as shown on Figure 8.</td></tr>
<tr><td>Surrounding Land Uses and Setting
(Refer to Figure 4 – General Plan Land Use and Figure 5 – Specific Plan Land Use)</td><td>
<table>
<tr><th>Boundary</th><th>General Plan Land Use</th><th>Zoning</th><th>Specific Plan Land Use</th><th>Existing Land Use</th></tr>
<tr><td>North</td><td>PVCCSP</td><td>PVCCSP</td><td>Light Industrial</td><td>Vacant land</td></tr>
<tr><td>East</td><td>PVCCSP</td><td>PVCCSP</td><td>Light Industrial</td><td>Vacant land</td></tr>
<tr><td>South</td><td>PVCCSP</td><td>PVCCSP</td><td>Public/Semi–Public Facility and Light Industrial south of that</td><td>Colorado River Aqueduct</td></tr>
<tr><td>West</td><td>PVCCSP</td><td>PVCCSP</td><td>Light Industrial</td><td>Warehouse</td></tr>
</table>
</td></tr>
<tr><td>Other public agencies whose approval is required</td><td>• An easement from the Metropolitan Water District of Southern California (MWD) for use of an MWD-owned property for a private street to access the Project site. Specifically, the portion of Sinclair Street, west of Perris Boulevard.
• A National Pollutant Discharge Elimination System (NPDES) permit from the Santa Ana Regional Water Quality Control Board (RWQCB) to ensure that construction site drainage velocities are equal to or less than the pre-construction conditions and downstream water quality is not worsened.
• Approval of water and sewer improvement plans by the Eastern Municipal Water District.
• Compliance with the South Coast Air Quality Management District Indirect Source Rule (Rule 2305) for warehouse owners and operators and a permit to operate a diesel fueled fire flow pump.</td></tr>
<tr><td>Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is</td><td>Yes. The City’s compliance with Assembly Bill (AB) 52 is discussed in Section 18, Tribal Cultural Resources, below.</td></tr>
</table>

there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?	

5.1. AESTHETICS	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐

References: GP, GPEIR, IDA, PMC, PVCCSP, PVCCSP EIR, USCB-A, USCB-B

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

The PVCCSP includes Standards and Guidelines relevant to aesthetics/visual character and lighting. The Standards and Guidelines summarized below are incorporated as part of the proposed Project and are assumed in the analysis presented in this section. The chapters/section numbers provided correspond to the PVCCSP chapters/sections. There are no mitigation measures for aesthetics included in the PVCCSP EIR although PVCCSP EIR mitigation measures **MM Haz 3** and **MM Haz 5,** which are listed in Section 5.9, address potential impacts associated with lighting at the Project site.

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

4.1 Perris Valley Commerce Center On-Site Development Standards

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

4.2 On-Site Standards and Guidelines

4.2.1 General On-Site Project Development Standards and Guidelines

- Uses and standards shall be developed in accordance with the Specific Plan.
- Uses and standards shall be developed in accordance with City of Perris Codes.

- Development shall be consistent with the Perris Valley Commerce Center Specific Plan.
- No Changes to Development Procedures Except as Outlined in the Specific Plan.
- Residential Buffer.
- Visual Overlay Zones.

4.2.3 Architecture

- 4.2.3.1 Scale, Massing and Building Relief: Scaling in Relationship to Neighboring Structures; Variation in Plane and Form; Project Identity; Do Not Rely on Landscaping; Distinct Visual Link; Break Up Tall Structures; Avoid Monotony; Avoid Long, Monotonous and Unbroken Building Facades; Provide Vertical or Horizontal Offsets; and Fenestration.
- 4.2.3.2 Architectural Elevations and Details: Primary Building Entries; Elements of a Building; Large Sites with Multiple Buildings; Discernible Base, Body and Cap; Visual Relief; and Building Relief.
- 4.2.3.3 Roofs and Parapets: Integral Part of the Building Design; Overall Mass; Varied Roof Lines; Form and Materials; Avoid Monotony; Variation in Parapet Height; Flat Roof and Parapets; and Conceal Roof Mounted Equipment.
- 4.2.3.5 Color and Materials: Facades; Building Trim and Accent Areas; Metal Siding; and High-Quality Natural Materials.

4.2.4. Lighting

- 4.2.4.1 General Lighting: Safety and Security; Lighting Fixtures Shield; Foot-candle Requirements Sidewalks/Building Entrances; and Outdoor Lighting.
- 4.2.4.2 Decorative Lighting Standards: Decorative Lights; Complimentary Lighting Fixtures; Monumentation Lighting; Compatible with Architecture; Up-Lighting; Down- Lighting; Accent Lighting; and High Intensity Lighting.
- 4.2.4.3 Parking Lot Lighting: Parking Lot Lighting Required; Foot-candle Requirements Parking Lot; Avoid Conflict with Tree Planting Locations; Pole Footings; and Front of Buildings and Along Main Drive Aisle.

4.2.5 Signage Program

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

4.2.6 Walls/Fences

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

4.2.8 Residential Buffer Development Standards and Guidelines

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

Landscape Standards and Guidelines (from Chapter 6.0 of the PVCCSP)

6.1 On-Site Landscape General Requirements

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

6.1.1 On-Site Landscape Screening

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

6.1.2 Landscape in Parking Lots

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

6.1.3 On-Site Plant Palette

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

8.2 Industrial Development Standards and Guidelines

8.2.1 Industrial Site Layout

- 8.2.1.1 Orientation/Placement: Industrial Operations.
- 8.2.1.4 Employee Break Areas and Amenities: Outdoor Break Areas.
- 8.2.1.5 Screening: Truck Courts.

8.2.2 Landscape

- No Landscape in Screened Truck Courts.

EXPLANATION OF CHECKLIST ANSWERS

1a. **Less than significant impact.** Scenic vistas are defined as the view of an area that is visually or aesthetically pleasing. Development projects may potentially impact scenic vistas in two ways: 1) directly diminishing the scenic quality of the vista, or 2) by blocking the view corridors or "vistas" of scenic resources. The proposed Project site is located within the Perris Valley and the terrain is generally flat. As described in the Perris General Plan 2030 EIR, virtually all building construction consistent with land use development standards will obstruct views of the foothills from at least some vantage points. (GPEIR, p. VI-2.) However, these view corridors extend for

miles along current and planned roadways, preserving scenic vistas from the broad basin to the surrounding foothills.

The proposed Project involves construction and operation of a non-refrigerated warehouse distribution facility (**Figure 7-Proposed Site Plan**), which is consistent with the PVCCSP Light Industrial (LI) land use designation. The proposed Project is also consistent with the land use development standards contained within the Perris General Plan and the PVCCSP Since the Project site is not a scenic vista nor would the Project, once constructed, block views of a scenic vista, impacts would be less than significant.

1b. **No impact.** The closest officially-designated State Scenic Highway is State Route (SR)-74 east of the City of Hemet and the nearest eligible State Scenic Highway (not officially designated) is a segment of SR-74 in the southern part of the City of Perris approximately 11 miles southeast from the Project site. Additionally, the PVCCSP EIR identified no specific scenic resources such as trees, rock outcroppings, or unique features within the Specific Plan area. Moreover, the proposed Project site is currently developed with two industrial buildings and their associated parking and landscaping and as such does not contain rock outcroppings. Therefore, since there is not a state scenic highway in proximity to the Project site, construction and operation of the proposed Project would not substantially damage scenic resources within a state scenic highway. No impacts would occur.

1c. **Less than significant impact.** According to the CEQA statue (set forth in Public Resources Code 21071(a)), an urbanized area is an incorporated city that meets either of the following criteria: (1) has a population of at least 100,000 persons, or (2) has a population of less than 100,000 persons if the population of that city and no more than two contiguous incorporated cities combined equals at least 100,000 persons. According to the US Census Bureau, in 2022 the City's population was approximately 80,263 (USCB-A) and the population of Moreno Valley, the contiguous city to the north, was 211,924 (USCB-B); therefore, the Project site is located within an urbanized area.

Because the Project site is located within an urbanized area, the threshold for analysis is would the Project conflict with applicable zoning and other regulations governing scenic quality. The proposed Project has been designed according to the Standards and Guidelines set forth in the PVCCSP to address visual character, including but not limited to: Chapter 4.0, On-site Design Standards and Guidelines; Chapter 6.0, Landscape Standards and Guidelines; Chapter 8.0, Industrial Design Standards and Guidelines. Further, existing land uses surrounding the proposed Project site include a mixture of industrial buildings (warehouses) and the Project site is developed with a warehouse building, a recycling center, and associated parking and lighting. (Refer to **Figure 2.**) Because design, construction, and operation of the proposed Project would not conflict with applicable zoning and other regulations governing scenic quality, impacts in this regard would be less than significant.

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

refers to reflected sunlight or artificial light that interferes with vision or navigation, may also arise from new development; for example, from the use of reflective materials on building exteriors.

Windows are the main source of glare complaints on buildings. The two existing industrial uses includes windows on their buildings and glare from these windows is currently produced. The proposed warehouse building would not introduce substantial new daytime glare to the area since glare from the existing uses already exist. Additionally, because the once constructed, the proposed warehouse structure would consist of a concrete tilt-up building with few windows which would be as non-reflective as possible to allow for interior natural light. Most of the windows would be placed in the two office areas as shown on **Figure 9 – Elevations.**

The existing industrial uses currently includes existing lighting that likely produces nighttime light and glare. Once constructed. the proposed Project would also include security lighting which may result in nighttime light and glare, similar to the existing uses. However, all new lighting would be designed pursuant to Perris Municipal Code (PMC) Chapter 19.02.110, which includes requirements for installation of energy-efficient lighting as well as shielding of parking lot lights to minimize spillover onto adjacent properties and rights-of-way. The proposed Project would also comply with the lighting requirements in Section 4.2.4 of the PVCCSP, which contains lighting standards for general, decorative, and parking lot lighting, as well as PVCCSP EIR mitigation measures **MM Haz 3** and **MM Haz 5**, listed in Section 5.9 which address potential impacts to aircraft operations associated with lighting at development sites.

During Project construction, nighttime lighting may be used within the construction staging areas to provide security for construction equipment. Due to the distance between the construction area and motorists on adjacent roadways, such security lights may result in glare to residents and motorists. However, this potential impact would be reduced to a less than significant level with implementation of Project-specific mitigation measure **MM AES 1**.

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

Therefore, impacts with regard to creating a new source of substantial light or glare which would adversely affect day or nighttime views in the area would be less than significant with mitigation incorporated.

Remainder of page intentionally blank.

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

References: Department of Conservation (DOC), FMMP, GPEIR, PVCCSP EIR, RCIT, PMC

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

2a. **No impact.** The proposed Project site is classified as Urban and Built-up Land by the Farmland Mapping and Monitoring Program. Per the Farmland Mapping and Monitoring Program, Urban and Built-up Land are not considered agricultural land or Farmland. Because there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance at the Project site, there would not be any impacts related to the conversion of Farmland. Thus, no impact would occur.

2b. **No impact.** The City's 1991 General Plan eliminated the agricultural land use designation from within City boundaries. (GPEIR, p. VI-3.) Therefore, there are no agricultural zones identified by the City. Additionally, the proposed Project site is not covered under a Williamson Act Contract. (PVCCSP EIR, p. 4.1-7.) The proposed Project site is zoned PVCCSP with a PVCCSP Land Use designation of Light Industrial (LI). Therefore, implementation of the proposed Project would not

conflict with an existing zoned agricultural use or a Williamson Act Contract; no impacts would occur.

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

2d. **No impact.** As discussed in *Section 2c*, above, there is no land zoned forest land within the City. Therefore, implementation of the proposed Project would have no impact on land zoned for forest land and would not result in the conversion of forest land to non-forest uses.

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

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

References: CARB-A, CARB-B SCAQMD-A, SCAQMD-B, SCAQMD-C, SCAQMD-D, PVCCSP, WEBB-A, WEBB-B, WEBB-C

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

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

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

> **MM Air 1**: To identify potential implementing development project-specific impacts resulting from construction activities, proposed development projects that are subject to CEQA shall have construction-related air quality impacts analyzed using the latest available URBEMIS model, or other analytical method determined in conjunction with the SCAQMD. The results of the construction-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Threshold analysis or other appropriate analyses as determined in conjunction with SCAQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.
>
> **MM Air 10**: To identify potential implementing development project-specific impacts resulting from operational activities, proposed development projects that are subject to CEQA shall have long-term operational-related air quality impacts analyzed using the latest available URBEMIS model, or other analytical method determined by the City of Perris as lead agency in conjunction with the SCAQMD. The results of the operational-

related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Threshold analysis, CO Hot Spot analysis, or other appropriate analyses as determined by the City of Perris in conjunction with SCAQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.

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

In addition, coordination with the Riverside Transit Agency (RTA) as required by PVCCSP EIR mitigation measure **MM Air 18** has been completed. The RTA has determined that no bus stop is required at the Project site.

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

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

EXPLANATION OF CHECKLIST ANSWERS

3a. **Less than significant impact.** The City of Perris is located within the South Coast Air Basin (Basin). The South Coast Air Quality Management District (AQMD) is responsible for comprehensive air pollution control within the Basin and prepares the Air Quality Management Plan (AQMP) for the Basin. The AQMP sets forth a comprehensive program that will lead the Basin into compliance with all federal and state air quality standards. The AQMP's control measures and related emission reduction estimates are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with the Southern California Association of Governments (SCAG) and local governments. (SCAQMD-A.) Accordingly, if a project demonstrates compliance with local

land use plans and/or population projections, then the AQMP would have taken into account such uses when it was developed.

The proposed Project site is zoned PVCCSP and has a PVCCSP land use designation of LI. The Project applicant proposes to construct and operate the building as a non-refrigerated warehouse distribution facility which is a permitted use under the LI land use designation. Therefore, this land use and associated air quality emissions would have been accounted for in the South Coast AQMD's 2022 AQMP.

Population and employment estimates for the City of Perris are compiled by the Southern California Association of Governments (SCAG) in Connect SoCal 2020The Project involves the redevelopment of existing uses and the Project may increase employment opportunities within the City. The employment projections in Connect SoCal 2020are based on information gathered from cities within SCAG's jurisdiction. Hence, because the proposed Project is consistent with the existing land use designation in the PVCCSP and the Perris General Plan, employment estimates associated with implementation of the proposed Project would have also been accounted for in Connect SoCal 2020. Therefore, because the proposed Project is compliant with local and use plans and population projections, the proposed Project would not conflict with or obstruct implementation of the AQMP. Thus, impacts would be less than significant.

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

Air quality impacts can be described in a short- and long-term perspective. Short-term impacts occur during site grading and Project construction and consist of fugitive dust and other particulate matter, as well as exhaust emissions generated by construction-related vehicles. Long-term air quality impacts occur once the Project is in operation.

Construction Activities

The Project would be required to comply with existing South Coast AQMD rules for the reduction of fugitive dust emissions. South Coast AQMD Rule 403 establishes these procedures. Compliance with this rule is achieved through application of standard best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 mph, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph and establishing a permanent, stabilizing ground cover on finished sites. In addition, projects that disturb 50 or more acres or more of soil or move 5,000 cubic yards of materials per day are required to submit a Fugitive Dust Control Plan or a Large Operation Notification Form to the South Coast AQMD. Based on the size of this Project's disturbance area (approximately 20.53

acres), a Fugitive Dust Control Plan or a Large Operation Notification Form would not be required.

An *Air Quality/Greenhouse Gas Analysis* was prepared for the Project by Albert A. Webb Associates dated July 18, 2023 (WEBB-A) as included as Appendix A of this Initial Study. Short-term emissions from Project construction activities were evaluated using the California Emissions Estimator Model (CalEEMod) version 2022.1. The results of this analysis are summarized in **Table A** – **Unmitigated Estimated Maximum Daily Construction Emissions**, below.

Table A – Unmitigated Estimated Maximum Daily Construction Emissions

Activity	Peak Daily Emissions (pounds per day)					
	VOC	NO_X	CO	SO_2	PM-10	PM-2.5
South Coast AQMD Daily Construction Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
2024	**110.00**	**65.40**	**62.00**	**0.23**	**11.40**	**4.74**
2025	110.00	27.50	54.50	0.07	8.20	2.62
Maximum[1]	**110.00**	**65.40**	**62.00**	**0.23**	**11.40**	**4.74**
Exceeds Threshold?	**Yes**	**No**	**No**	**No**	**No**	**No**

Source: WEBB-A, Table 2 (Appendix A).
Notes: [1]Numbers are the maximum of summer or winter emissions in a given year. Maximum emissions are shown in bold.

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

Although the remaining construction emissions are below the South Coast AQMD daily construction thresholds, the Project is required to comply with the following PVCCSP EIR mitigation measures. Implementation of these PVCCSP EIR mitigation measures would further reduce the otherwise less than significant construction-related emissions of the Project.

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

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

- Requiring the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain);
- Keeping disturbed/loose soil moist at all times;
- Requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered;
- Installation of wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip;
- Posting and enforcement of traffic speed limits of 15 miles per hour or less on all unpaved portions of the project site;
- Suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 miles per hour;
- Appointment of a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM-10 generation;
- Sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks when sweeping streets to remove visible soil materials; and/or,
- Replacement of ground cover in disturbed areas as quickly as possible.

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

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

MM Air 6: The developer of each implementing development project shall require, by contract specifications, the use of alternative fueled off-road construction equipment, the use of construction equipment that demonstrates early compliance with off-road equipment with the CARB in-use off-road diesel vehicle regulation (SCAQMD Rule 2449) and/or meets or exceeds Tier 3 standards with available CARB verified or USEPA certified technologies. Diesel equipment shall use water emulsified diesel fuel such as PuriNOx unless it is unavailable in Riverside County at the time of project construction activities.

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

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.

Table B – Mitigated Estimated Maximum Daily Construction Emissions

Activity	Peak Daily Emissions (pounds per day)					
	VOC	NO_X	CO	SO_2	PM-10	PM-2.5
South Coast AQMD Daily Construction Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
2024	**35.40**	**65.40**	**62.00**	**0.23**	**11.40**	**4.74**
2025	30.70	27.50	54.50	0.07	8.20	2.62
Maximum[1]	**35.70**	**65.40**	**62.00**	**0.23**	**11.40**	**4.74**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: WEBB-A, Table 2 (Appendix A).
Notes: [1]Numbers are the maximum of summer or winter emissions in a given year. Maximum emissions are shown in bold.

Operational Activities

Long-term operational emissions are evaluated at build-out of a project. The non-refrigerated warehouse Project is assumed to be operational in 2025. The Project includes a diesel-powered fire flow pump. Because the fire flow pump would only be used during fire emergencies and routine testing, emissions would be negligible and was not modeled.

Mobile source emissions refer to on-road motor vehicle emissions generated from the Project's traffic and based on the trip generation provided in the Project-specific *Focused Traffic Study* included as Appendix J.1 of this Initial Study (WEBB-C). Default data from the local metropolitan planning organizations/Regional Transportation Planning Agencies was used for non-truck trips. An average truck trip length of approximately 40 miles was assumed, which is recommended by the City and based on the South Coast AQMD's *Final Staff Report for proposed Rule 2305 and Rule 316*.[2] On-site service equipment (i.e., forklifts) are assumed to be neither gasoline nor diesel-fueled (e.g. electric) and therefore would not have any substantive direct emissions of criteria pollutants. Area source emissions from the Project include stationary combustion emissions of natural gas used for space and water heating (shown in a separate row as energy), yard and landscape maintenance, and an average building square footage to be repainted each year. CalEEMod computes area source emissions based upon default factors and land use assumptions. CalEEMod defaults also include the 2019 Title 24 energy efficiency standards. Separate emissions were computed for both the summer and winter and are shown in **Table C – Estimated Unmitigated Daily Project Operation Emissions (Summer**) and **Table D – Estimated Unmitigated Daily Project Operation Emissions (Winter)**, respectively.

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

Source	Peak Daily Emissions (pounds per day)					
	VOC	NO_X	CO	SO_2	PM-10	PM-2.5
South Coast AQMD Daily Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Area	16.10	0.32	38.40	0.00	0.05	0.07
Energy	0.12	2.19	1.84	0.01	0.17	0.17
Mobile	3.27	9.38	43.70	0.15	11.00	2.93
Total	**19.49**	**11.89**	**83.94**	**0.16**	**11.22**	**3.17**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

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

[2] South Coast Air Quality Management District, Board Meeting Agenda No. 27, May 7, 2021, Attachment I, Final Staff Report, Proposed Rule 2305 – Warehouse Indirect Source Rule - Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305. (Available at http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10, accessed February 7, 2023.)

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

Source	Peak Daily Emissions (pounds per day)					
	VOC	NO_X	CO	SO_2	PM-10	PM-2.5
South Coast AQMD Daily Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Area	9.76	0.00	0.00	0.00	0.00	0.00
Energy	0.12	2.19	1.84	0.01	0.17	0.17
Mobile	3.07	9.92	35.90	0.14	11.00	2.93
Total	**12.95**	**12.11**	**37.74**	**0.15**	**11.17**	**3.10**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

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

Evaluation of the data presented in **Table C** and **Table D** above indicates that criteria pollutant emissions from operation of this Project would not exceed the South Coast AQMD's regional daily thresholds of significance for any pollutant during summer or winter. Therefore, the construction-related impacts of the Project would be less than significant. Although these emissions would not exceed the South Coast AQMD's thresholds of significance, the proposed Project is required to comply with the following PVCCSP EIR mitigation measures. Implementation of these PVCCSP EIR mitigation measures would further reduce the otherwise less than significant operational emissions of the 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 five 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, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year would be used at a facility with three or more dock-high doors, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP [On-road Heavy Duty Voucher Incentive Program], HVIP [Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project], and SOON [Surplus Off-Road Opt-in for NOx] funding programs, as identified on SCAQMD's website (http: //www.aqmd.gov). Tenants would be required to use those funds, if awarded.

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

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 reductions will be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.

As discussed above, the Project's mitigated construction emissions would not exceed the South Coast AQMD thresholds of significance. As shown in **Tables C** and **Table D**, above, the Project's operational emissions would not exceed the applicable South Coast AQMD thresholds of significance. As such, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment and no additional mitigation is required beyond those required by PVCCSP EIR mitigation measures listed above. Therefore, impacts would be less than significant and no Project-specific mitigation is required.

In addition, on May 7, 2021, the Governing Board of the South Coast AQMD 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_x 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 South Coast AQMD 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.

3c. Less than significant impact. For the purposes of CEQA, the South Coast AQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities (SCAQMD-C). Staff at the South Coast AQMD has developed localized significance threshold (LST) methodology that can be used by public agencies to determine whether or not a project may generate significant adverse localized air quality impacts (both short- and long-term). Additional analyses were conducted to evaluate impacts to sensitive receptors regarding Carbon Monoxide (CO) hot spots and health risk from mobile sources.

Localized Significance Threshold (LST)

As part of the South Coast AQMD's environmental justice program, attention has been focused on localized effects of air quality. Staff at the South Coast AQMD has developed localized significance threshold (LST) methodology that can be used by public agencies to determine whether or not a project may generate significant adverse localized air quality impacts (both short- and long-term). LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the state ambient air quality standard and are based on the ambient concentrations of that pollutant for each source receptor area. The Project site is located within source receptor area 24 (Perris Valley).

According to the LST methodology, only on-site emissions need to be analyzed. Emissions associated with vendor and worker trips are mobile source emissions that occur off site. The emissions analyzed under the LST methodology are NO_2, CO, PM-10, and PM-2.5. The South Coast AQMD has provided LST lookup tables to allow users to readily determine if the daily emissions for proposed construction or operational activities could result in significant localized air quality impacts for projects five acres or smaller. Although the Project site is more than five acres, it is anticipated that a smaller area would be disturbed per day. The South Coast AQMD's Fact Sheet for Applying CalEEMod to Localized Significance Thresholds is used to determine the maximum site acreage that is actively disturbed based on the construction equipment fleet and equipment hours as estimated in CalEEMod. Based on this South Coast AQMD guidance and the Project's equipment list during grading, Project site grading would disturb approximately 4 acres per day. (WEBB-A, p. 6), To provide a conservative analysis, the two-acre LST was utilized to compare the on-site emissions estimated by CalEEMod.

The LSTs are estimated using the maximum daily disturbed area (in acres) and the distance of the Project site to the nearest sensitive receptors (in meters). The closest sensitive receptor to the Project construction site is New Creation Church to the southeast of the Project site along Business Park Drive, approximately 985 feet (300 meters) away. The closest receptor distances on the LST look-up tables are 200 and 500 meters. Therefore, a receptor distance of 200 meters (656 feet) was used to ensure a conservative analysis. The results are summarized below in **Table E – LST Results for Daily Construction Emissions**, below.

Table E – LST Results for Daily Construction Emissions

Pollutant	Peak Daily Emissions (pounds per day)			
	NO_X	CO	PM-10	PM-2.5
LST for 2-acre site at 200 meters	**379**	**5,136**	**75**	**23**
Demolition 2024	13.20	**58.90**	**7.67**	1.92
Grading 2024	**34.60**	30.50	3.89	**2.30**
Building Construction 2024	12.20	14.20	0.54	0.49
Building Construction 2025	11.30	14.10	0.47	0.43
Paving 2024	8.10	10.40	0.40	0.37
Paving 2025	7.73	10.30	0.36	0.33
Architectural Coatings 2024	1.21	1.53	0.04	0.04
Architectural Coatings 2025	1.18	1.52	0.04	0.03
Maximum[1]	**34.60**	**58.90**	**7.67**	**2.30**
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: WEBB-A, Table 5 (Appendix A).
Notes: [1] Maximum emissions are the greater of either demolition or grading in 2024, or the sum of building construction, paving, and architectural coating in 2024, or the sum of building construction, paving, and architectural coating in 2025 since these activities overlap. Maximum emissions are shown in bold.

As shown in **Table E**, emissions from construction of the Project would be below the LSTs established by the South Coast AQMD that are applicable to the Project.

According to the LST methodology, LSTs only apply to the operational phase if a project includes stationary sources or attracts mobile sources that may spend long periods of time idling at the site, such as warehouse/transfer facilities. LSTs only apply to the operational phase if a project includes stationary sources or attracts mobile sources that may spend long periods of time idling at the site, such as warehouse/transfer facilities. The Project includes a diesel-powered fire flow pump. Because the fire flow pump would only be used during fire emergencies and routine testing, emissions would be negligible. The Project applicant would be required to obtain an South Coast AQMD permit to install and operate the fire flow pump. The South Coast AQMD permitting process would ensure that the Project meets regulatory requirements through the application review process and by placing specific operating conditions on the permit such as operating hour limits. As such, no further analysis of the fire pump was prepared. Because the proposed Project would operate as a warehouse distribution facility and have the potential to attract mobile sources that can reasonably be assumed to idle at the site, a long-term LST analysis was prepared for this Project. Although the Project site exceeds five acres, per the South Coast AQMD, the LST lookup tables can be used as a screening tool to determine if dispersion modeling would be necessary. Therefore, the Project's on-site emissions from CalEEMod and LST Look-Up Tables for the 5-acre site were utilized as a screening-level analysis.

CalEEMod version 2022.1 was utilized to estimate the Project's emissions from trucks traveling within the Project site. An on-site distance of 0.54 mile was conservatively assumed to be traveled for each one of the Project's truck trips identified in the *Focused Traffic Study* (Appendix J.1). The output is attached to the *Air Quality/Greenhouse Gas Analysis* prepared for this Project (included as Appendix A of this Initial Study) and summarized below. Although PVCCSP EIR mitigation measure **MM Air 11** limits on-site idling to 5 minutes per truck per day, the analysis assumes an unmitigated scenario where each truck trip idles for 15-minutes per day, which conservatively overestimates idling emissions. The results were added to the total PM-10 and PM-2.5 emissions from CalEEMod and presented in the table below. The closest sensitive receptors to the Project operations is the New Creation Church to the southeast of the Project site along Business Park Drive, approximately 985 feet (300 meters) away. Therefore, a receptor distance of 200 meters (656 feet) was used to ensure a conservative analysis. The results are summarized in **Table F – LST Results for Daily Operational Emissions**, below.

Table F – LST Results for Daily Operational Emissions

Pollutant	Peak Daily Emissions (pounds per day)			
	NO_X	CO	PM-10[1]	PM-2.5[1]
LST for 5-acre at 200 meters	**488**	**6,860**	**23**	**8**
On-Site Emissions	3.58	40.90	0.28	0.26
Exceeds Threshold?	**No**	**No**	**No**	**No**

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

As indicated in **Table F**, Project-related long-term operational emissions would not exceed any South Coast AQMD operational LST.

CO Hotspots

A carbon monoxide (CO) "hot spot" is a localized concentration of CO that is above the state or federal 1-hour or 8-hour ambient air quality standards. Localized high levels of CO are associated with traffic congestion and idling or slow-moving vehicles.

Based on the information presented below, a CO "hot spot" analysis is not needed to determine whether the addition of Project related traffic would contribute to an exceedance of either the state or federal ambient air quality standards for CO emissions in the Project area.

The analysis prepared for CO attainment in the South Coast Air Basin by the South Coast AQMD can be used to assist in evaluating the potential for CO exceedances in the South Coast Air Basin. CO attainment was thoroughly analyzed as part of the South Coast AQMD's 2003 Air Quality Management Plan (2003 AQMP) and the Revised 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the South Coast Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans. (WEBB-A, pp. 7-8).

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Blvd. and Imperial Highway (Lynwood); Wilshire Blvd. and Veteran Ave. (Westwood); Sunset Blvd. and Highland Ave. (Hollywood); and La Cienega Blvd. and Century Blvd. (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated in the 1992 CO Plan and subsequent 2003 AQMP was that at Wilshire Blvd. and Veteran Ave., which has a daily traffic volume of approximately 100,000 vehicles per day (2003 AQMP Appendix V, Table 4-7). The Los Angeles County Metropolitan Transportation Authority evaluated the level of service in the vicinity of the Wilshire Blvd./Veteran Ave. intersection and found it to be level of service E at peak morning traffic and level of service F at peak afternoon traffic. This hot spot analysis was conducted at intersections subject to extremes in vehicle volumes and vehicle congestion, and did not predict any violation of CO standards. Considering that Project-related traffic would result in an increase of 592 daily trips on local roadways, it can reasonably be concluded that Project-related traffic would not have daily traffic volumes exceeding those at the intersections modeled in the 2003 AQMP, nor would there be any reason unique to the meteorology to conclude that intersections affected by the Project would yield higher CO concentrations if modeled in detail. (WEBB-A, p. 8). Thus, the Project would not result in CO hot spots.

Health Risk Assessment

A *Health Risk Assessment* was prepared for the Project by Albert A. Webb Associates dated July 19, 2023 (WEBB-B) and included as Appendix B of this Initial Study. Health risk assessments are commonly used to estimate the health risks to the surrounding community from projects that

significantly increase the number of diesel vehicles and hence increase the amount of diesel particulate matter in the area. The correlation between project-specific emissions and potential health impacts is complex and the South Coast AQMD has determined that attempting to quantify health risks from small projects (such as this) would not be appropriate because it may be misleading and unreliable for various reasons including modeling limitations as well as where in the atmosphere the air pollutants interact and form. (SCAQMD-D, pp. 9-15). Notwithstanding, the analysis herein includes a health risk assessment and a localized impact analysis, discussed above, for the immediate vicinity that is based on the potential to exceed the most stringent ambient air quality standards developed for the most sensitive individuals.

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

Six sensitive receptors and four off-site worker receptors were modeled in the *Health Risk Assessment* as shown on **Figure 11 – Discrete Receptor Locations** at the end of Section 5.3. All receptor locations were modeled at the nearest property boundary to provide a conservative analysis. Receptor 1- Receptor 3 are industrial uses. Receptor 1 is immediately west of the Project site; Receptor 2 is south of the Project site, and Receptor 3 is east of the Project site, along Perris Boulevard. Receptor 4- Receptor 10 are residential, school, and church uses. Receptor 4, the closest sensitive receptor to the Project site, is a church and is located southwest of the Project site, along Business Park Drive; Receptor 5 and Receptor 6 represent the Camper Resorts of America facility along Redlands Avenue, which is an RV park and although the City considers this facility to be a transient commercial use, it was modeled as a sensitive receptor for diesel particulate matter to provide a more conservative analysis; Receptor 7- 9 are non-conforming residential uses along Indian Avenue, and Receptor 10 is Val Verde Elementary School along Indian Avenue, south of Placentia Avenue.

As shown in **Table G – Project-Generated Cancer Risk,** each of the modeled receptor locations would be exposed to Project-related cancer risks from diesel particulate matter on the modeled roadways that substantially below the South Coast AQMD threshold of 10 in one million. The highest cancer risk at modeled receptor locations is 0.6 per million, located at Receptor 7 and Receptor 9, the property boundary of sensitive receptors. The highest cancer risk at the modeled school is 0.0 in one million, located at Receptor 10, at Val Verde Elementary School. The highest modeled cancer risk at off-site worker receptors is 0.2 per million, located at Receptor 1. Therefore, the Project's diesel particulate matter emissions would not result in cancer risks of greater than 10 in one million to the mapped sensitive receptors in the vicinity of the Project site.

Table G – Project-Generated Cancer Risk

Receptor	Cancer Risk (per million)
Off-site Worker Receptors	
1	0.2
2	0.1

3	0.1
Sensitive Receptors	
4	0.3
5	0.4
6	0.4
7	0.6
8	0.5
9	0.6
Off-site Worker Receptors	
10	0.0

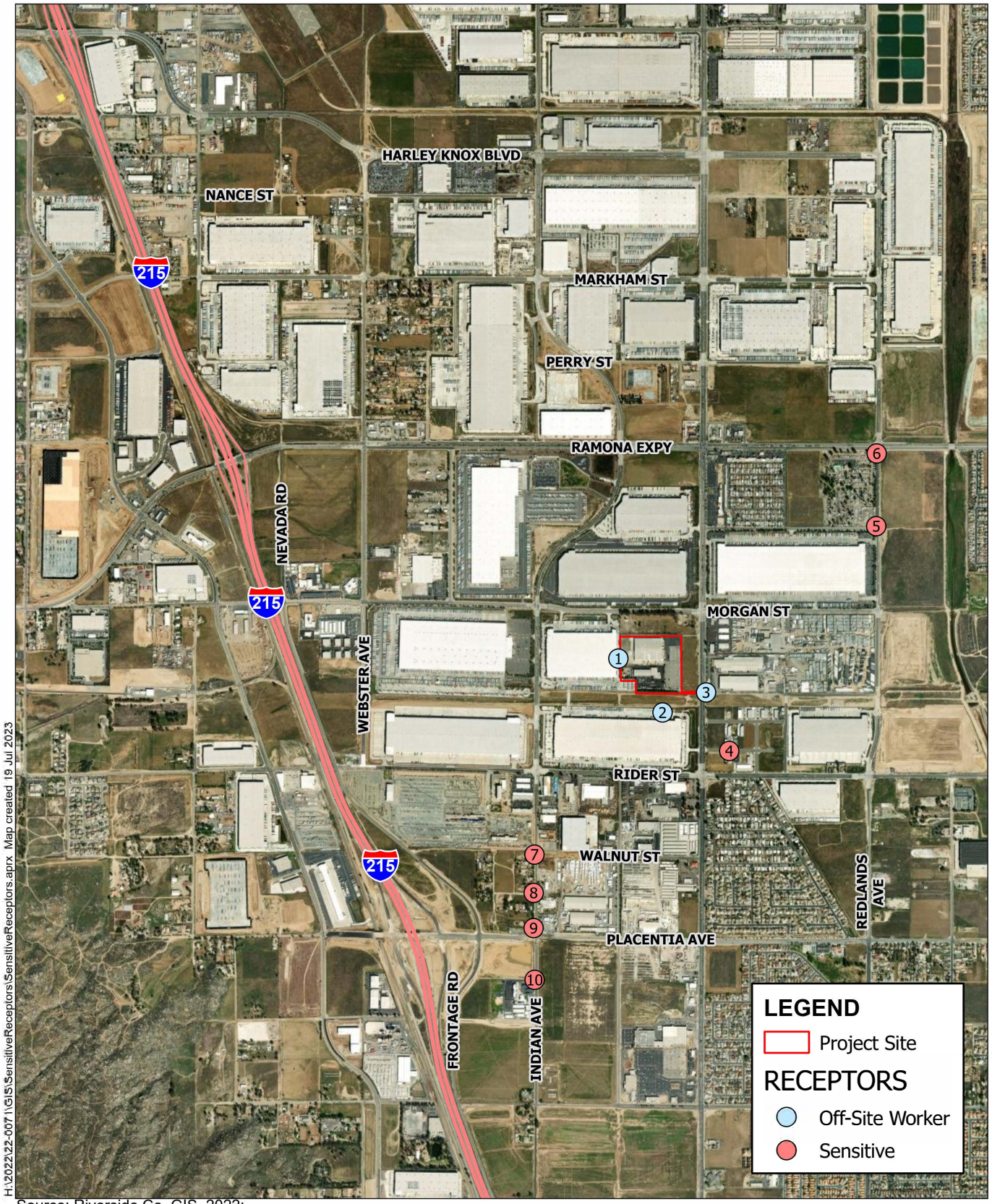
Source: WEBB-B, Table 4 (Appendix B).

In terms of non-cancer risks, the Office of Environmental Health Hazard Assessment has developed acute and chronic reference exposure levels for determining the non-cancer health impacts of toxic substances. The maximum diesel particulate matter concentration results in a hazard index of 0.002368 which is approximately less than one percent of the allowed threshold of 1.0 (WEBB-B, p. 16).

Based on the discussion above, the Project would not result in localized criteria pollutant impacts during construction or operation, would not generate a CO hot spot, and would not exceed South Coast AQMD cancer and non-cancer risk thresholds of significance. Therefore, impacts would be less than significant and no mitigation is required.

3d. **Less than significant impact.** The proposed Project presents the potential to result in other emissions, such as those leading to odors in the form of diesel exhaust during construction in the immediate vicinity of the proposed Project site. The closest sensitive receptor to the Project construction site is the New Creation Church to the southeast of the Project site along Business Park Drive, approximately 985 feet (300 meters) away church. However, odors generated during construction would be short-term and would not result in a long-term odorous impact to the surrounding area.

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



H:\2022\22-007\GIS\SensitiveReceptors\SensitiveReceptors.aprx Map created 19 Jul 2023

Source: Riverside Co. GIS, 2022;
USDA NAIP, 2019

0 500 1,000 1,500
Feet

Figure 11 - Discrete Receptor Locations

First Industrial Logistics at Sinclair Project

ALBERT A. WEBB ASSOCIATES

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

References: BLUE, GPEIR, PVCCSP EIR

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

4a. Less than significant with mitigation. The *Biological Assessment Report for the 100 and 200 Sinclair Project, City of Perris,* dated November 13, 2023 (included as Appendix C of this Initial Study), was prepared by BLUE Consulting Group (BLUE) to document the existing biological

resources at the site. A pedestrian-based biological survey[3] of the biological study area was conducted on February 2, 2022, July 6, 2022, and June 5, 2023. The biological study area includes the Project site (20.2 acres) and the 0.37-acre off-site improvement area plus an additional buffer totaling 4 acres plus a 100-foot buffer. At the time of the survey, the Project site was observed to be mostly developed and landscaped and contained two buildings and associated parking. The eastern side of the Project site contains an undeveloped area that is maintained. (BLUE, p. 3.) This undeveloped area is the site for an in process industrial project by another developer. Sinclair Street, east of Perris Boulevard, is an east west partial unimproved road. The surrounding land uses consists of industrial uses, the Colorado River Aqueduct, and vacant land that is the potential site for an industrial project by another developer. (See **Figure 2 – Aerial Map.**)

Prior to beginning the field survey, BLUE conducted a literature review to determine the locations and types of biological resources having the potential to exist within the region. The Project site is within the Cabazon, California quadrangle but is close enough to the Beaumont, California quadrangle that database searches were conducted for both quadrangles. The Transportation and Land Management Agency Geographic Information Services Database and Multiple Species Habitat Conservation Plan (MSHCP) Report were also reviewed. In addition to utilizing on-line databases and mapping tools, the topographic map was reviewed to determine the locations of any potential special aquatic resource areas (e.g., wetlands or other Waters of the United States or Waters of the State) under regulatory jurisdiction of the US Army Corps of Engineers, the California Department of Fish and Wildlife (CDFW), or the Regional Water Quality Control Board (RWQCB), and riparian/riverine habitats prior to beginning field surveys of the Project site. Additionally, the United States Department of Agriculture Natural Resources Conservation Service online Web Soil Survey tool and Figure 2-4 of the MSHCP were reviewed to determine the types and percent cover of soils within the Project site. (BLUE, p. 4.) Lands within the biological study area that were potentially suspected of being potential special aquatic resource and riparian/riverine habitats were then assessed by visual observation during the field survey. Potential special aquatic resource areas and riparian/riverine habitats were not observed, and additional further evaluation is not required. (BLUE, p. 4.)

The results of the literature review and biological survey indicate that the Project site and the off-site improvement area includes two vegetation community types, Developed and Disturbed. No natural ground and/or naturally occurring vegetation was observed. The mature maintained eucalyptus trees (Eucalyptus sp.) around the perimeter of the Project site are landscaping trees on private property. These Eucalyptus trees are not considered protected and/or sensitive and would be removed as part of the Project. (BLUE, p. 6.)

Five plant species, all of which are non-native, were observed within the biological study area: Eucalyptus ssp. (*Eucalyptus* spp.), Russian thistle (*Salsola tragus*), prickly lettuce *(Lactuca serriola),* Erodium (*Erodium* spp.), and Black Mustard (*Brassica nigra*). The biological study area is not designated as a rare survey area for any species. (BLUE, p. 7.) As a result of the developed areas, ongoing maintenance, and the destruction of the appropriate soil structure through grading and compaction within the planted areas, there is no potential for the presence of Special Status plant species. Similarly, the occurrence of other rare plants within the Project site and the off-site improvement area is low and they do not provide suitable habitat for other

[3] The pedestrian survey was conducted by walking approximately 100-foot wide meandering transects to provide visual coverage of the biological study area.

Cell Criteria Species as well as Narrow Endemic Plant Species such a' Marvin's onion (*Allium marvinii*) and Many-stemmed dudleya (*Dudleya multicaulis*). (BLUE, p. 7.)

One wildlife species was observed within the biological study area, the American crow (*Corvus brachyrhynchos).* No special-status wildlife species were observed. The biological study area lacks the appropriate hydrology and habitat for special-status wildlife to be present. Additionally, the Project site is subject to noise from the nearby streets; Barret Avenue, an active dirt road, and Sinclair Street. As a result, special-status wildlife species are not expected to occur within the biological study area and are considered to have no potential for occurrence on-site. Due to the lack of riparian habitat within or adjacent to the biological study area, no bird species associated with riparian areas were observed and none are expected to occur. (BLUE, p. 7.)

The biological study area is located within the Western Riverside MSHCP burrowing owl survey area, which requires a pre-construction MSHCP protocol survey for burrowing owl. The burrowing owl is considered a CDFW Species of Special Concern (SSC). A burrowing owl assessment was completed according to the Burrowing Owl Survey Instructions for the Western Riverside County MSHCP Area. Due to the lack of appropriate quality habitat created by the mass grading in the planted area (compacted soils), in addition to a lack of mammal burrows, no burrowing owls or suitable habitat were located within the Project site or the off-site improvement area during the assessment. The Project site and the off-site improvement area do not contain suitable foraging habitat for raptors and/or burrowing owls. (BLUE, p. 8.) Although no burrowing owls were observed, they could potentially inhabit the Project site or the off-site improvement area in areas that were previously determined to be unoccupied. Therefore, as required by the MSHCP and PVCCSP EIR mitigation measure **MM Bio 2** (as updated in Project-specific mitigation measure **MM BR 2** per direction from the CDFW), a 30-day pre-construction burrowing owl survey would be conducted immediately prior to the initiation of construction to confirm that the species is not present at the Project site or the off-site improvement area at that time. If burrowing owls are detected within or adjacent to the Project site or the off-site improvement area during the pre-construction survey, the burrowing owls shall be relocated/excluded from the site outside of the breeding season following accepted protocols, and subject to approval of the Regional Conservation Authority, the CDFW, and the U.S. Fish and Wildlife Service (USFWS).

The existing mature eucalyptus trees at the Project site have the potential to provide habitat for nesting migratory birds. Therefore, the proposed Project has the potential to impact active bird nests if vegetation and trees are removed during the nesting season. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) (United States Code Title 33, Section 703 et seq.; see also Code of Federal Regulations Title 50, Part 10) and Section 3503 of the California Fish and Game Code. Any activities that occur during the nesting/breeding season of birds protected by the MBTA could result in a potentially significant impact if requirements of the MBTA are not followed. To comply with the MBTA and relevant sections of the California Fish and Game Code (e.g., Sections 3503, 3503.4, 3544, 3505, et seq.), vegetation clearing should take place outside of the typical avian nesting season (i.e., generally February 1st -August 31st although the nesting season may be extended due to weather and drought condition), to the maximum extent practical. Implementation of Project-specific mitigation measure **MM BR 1** (replacing PVCCSP EIR mitigation measure **MM Bio 1** per CDFW direction) would ensure MBTA compliance and would require a nesting bird survey to be conducted prior to the

commencement of site preparation activities during nesting season, which would reduce potential impacts related to nesting avian species to a less than significant level.

Therefore, with implementation of Project-specific mitigation measures **MM BR 1** and **MM BR 2** the proposed Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive or special status species. Thus, impacts would be less than significant.

> **MM BR 1**: In order to avoid violation of the MBTA and the California Fish and Game Code, site preparation activities (ground disturbance, construction activities, staging equipment, and/or removal of trees and vegetation) for the Project shall be avoided, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species.
>
> If site-preparation activities are proposed during the nesting/breeding season, the Project proponent shall retain a qualified biologist to conduct a pre-activity field survey prior to the issuance of grading permits for the Project to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone.
>
> If active nests are not located within the Project site and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, then construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, then the Biologist shall immediately establish a conservative avoidance buffer surrounding the nest based on their best professional judgement and experience. The Biologist shall monitor the nest at the onset of project activities, and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the Biologist determines that such project activities may be causing an adverse reaction, the Biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers will be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The on-site qualified biologist will review and verify compliance with these nesting avoidance buffers and will verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found. Upon completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to City for mitigation monitoring compliance record keeping.
>
> **MM BR 2**: The Project proponent shall retain a qualified biologist to conduct a pre-construction survey for resident burrowing owls within 30 days prior to commencement of grading and construction activities on the Project site. The survey will include the Project site and all suitable burrowing owl habitat within a 500-foot buffer. The results of the survey will be submitted to the City prior to obtaining a grading permit. In addition, if burrowing owls are observed during the MBTA nesting bird survey, to be conducted within three days prior to ground

disturbance or vegetation clearance, the observation shall be reported to the Wildlife Agencies. 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 Survey Instructions for the Western Riverside MSHCP.

If burrowing owl are detected, the CDFW shall be sent written notification by the City, within three days of detection of burrowing owls. If active nests are identified during the pre-construction survey, the nests shall be avoided and the qualified biologist and Project Applicant shall coordinate with the City of Perris Planning Department, the USFWS, and the CDFW to develop a Burrowing Owl Plan to be approved by the City in consultation with the CDFW and the USFWS prior to commencing Project activities. The Burrowing Owl Plan shall be prepared in accordance with guidelines in the CDFW Staff Report on Burrowing Owl (March 2012) and MSHCP. The Burrowing Owl Plan shall describe proposed avoidance, minimization, relocation, and monitoring as applicable. The Burrowing Owl Plan shall include the number and location of occupied burrow sites and details on proposed buffers if avoiding the burrowing owls and/or information on the adjacent or nearby suitable habitat available to owls for relocation. If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls may also be required in the Burrowing Owl Plan. The Permittee shall implement the Burrowing Owl Plan following CDFW and USFWS review and concurrence. A final letter report shall be prepared by the qualified biologist documenting the results of the Burrowing Owl Plan. The letter shall be submitted to the CDFW prior to the start of Project activities. When a qualified biologist determines that burrowing owls are no longer occupying the Project site per the criteria in the Burrowing Owl Plan, Project activities may begin.

If burrowing owls occupy the Project site after Project activities have started, then construction activities shall be halted immediately. The Project proponent shall notify the City and the City shall notify the CDFW and the USFWS within 48 hours of detection. A Burrowing Owl Plan, as detailed above, shall be implemented.

4b. **Less than significant impact.** No MSHCP riparian/riverine lands which contain habitat dominated by trees, shrubs, persistent emergents, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year are present within the Project site or the off-site improvement area. (BLUE, p. 8.) No riparian/riverine and/or jurisdictional features were observed within the biological study area. Due to a lack of riparian habitat within or adjacent to the Project site and the off-site improvement area, no bird species associated with riparian areas were observed and none are expected to occur. (BLUE, p. 8.) Therefore, the proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community and impacts would be less than significant.

4c. **No impact.** Due to the improved and disturbed/maintained state of the Project site and the off-site improvement area, the biological study area does not contain any special aquatic resource areas such as wetlands or other areas under the regulatory jurisdiction of the Army Corps of Engineers, CDFW, and/or RWQCB. (BLUE, p. 9.) As such, no regulatory permits would be required for Project implementation and no impact to wetlands would occur.

4d. **Less than significant with mitigation.** The Project site is not located within any MSHCP designated Criteria Areas, Subunits, or linkages. (BLUE, p. 9.) The Project site is not designated as Public/Quasi-Public (PQP) or other MSHCP Conserved Lands (core, extension of existing core, non-contiguous habitat block, constrained linkage, or linkage area). (BLUE, p. 9.) There are no wildlife nursery sites within the biological study area. However, as discussed previously, the existing mature eucalyptus trees at the Project site have the potential to provide habitat for nesting migratory birds. Therefore, the proposed Project has the potential to impact active bird nests if vegetation and trees are removed during the nesting season. Nesting birds are protected under the federal MBTA and Section 3503 of the California Fish and Game Code. Any activities that occur during the nesting/breeding season of birds protected by the MBTA could result in a potentially significant impact if requirements of the MBTA are not followed. To comply with the MBTA and relevant sections of the California Fish and Game Code (e.g., Sections 3503, 3503.4, 3544, 3505, et seq.), vegetation clearing should take place outside of the typical avian nesting season (i.e., generally February 1st -August 31st although the nesting season may be extended due to weather and drought condition), to the maximum extent practical. Implementation of Project-specific mitigation measure **MM BR 1** (replacing PVCCSP EIR mitigation measure **MM Bio 1** per CDFW direction) would ensure MBTA compliance and would require a nesting bird survey to be conducted prior to the commencement of site preparation activities during nesting season, which would reduce potential impacts related to migratory birds to a less than significant level.

4e. **Less than significant impact**. The City of Perris does not have a tree preservation policy, However, the City of Perris adopted Ordinance No. 1123 to establish a local development mitigation fee for funding the preservation of natural ecosystems in accordance with the MSHCP. Additionally, the City adopted the following General Plan policies for the protection of biological resources. (Conservation Element, pp. 46-47.)

Goal II	Preservation of areas with significant biotic communities.
Policy II.A	Comply with state and federal regulations to ensure protection and preservation of significant biological resources.
Measure II.A.2	Public and private projects, located in areas with potential for moderate or high plant and wildlife sensitivity, require biological surveys as part of the development review process.
Measure II.A.3	Public and private projects that are also subject to federal or State approval with respect to impacts to Water of the U.S. and/or Streambeds require evidence of completion of the applicable federal permit process prior to the issuance of a grading permit.
Goal III	Implementation of the Multi-Species Habitat Conservation Plan (MSHCP).

Policy III.A	Review all public and private development and construction projects and any other land use plans or activities within the MSHCP area, in accordance with the conservation criteria procedures and mitigation requirements set forth in the MSHCP.

The Project applicant would be required to pay applicable MSHCP fees pursuant to Ordinance No. 1123. Through compliance with the MSHCP and this ordinance, development within the PVCCSP area would not conflict with any local policies or ordinances protecting biological resources. (PVCCSP EIR, p 4.3-28). Additionally, the proposed Project site is within a Stephens' Kangaroo Rat Fee Area as outlined in the Habitat Conservation Plan for the Stephens' Kangaroo Rat in Western Riverside County California. Payment of the applicable Stephens' Kangaroo Rat fee would ensure that impacts to Stephens' Kangaroo Rat are reduced to less than significant levels. Therefore, through compliance with these policies, impacts are considered less than significant, and no mitigation is required.

4f. Less than significant with mitigation. The biological study area is located within the Mead Valley Area Plan area of the Western Riverside MSHCP; however, the Project site and the off-site improvement area are not within a MSHCP Criteria Cell or Conservation Area. The MSHCP is a comprehensive multi-jurisdictional plan that includes western Riverside County and multiple cities, including the City of Perris. Rather than addressing sensitive species on an individual basis, the MSHCP focuses on the conservation of 146 species, proposing a reserve system of approximately 500,000 acres and a mechanism to fund and implement the reserve system. Most importantly, the MSHCP allows participating entities to issue take permits for listed species so that individual applicants need not seek their own permits from the USFWS and/or CDFW. The MSHCP was adopted on June 17, 2003, by the Riverside County Board of Supervisors. The Incidental Take Permit was issued by both the USFWS and CDFW on June 22, 2004. As the Project site in the City of Perris, the City is the lead agency/permittee.

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

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

The biological study area is located within the MSHCP Mead Valley Area Plan but is not located within any MSHCP designated Criteria Areas, group, or linkage area. (BLUE, p. 9.) Therefore, a Habitat Evaluation and Acquisition Negation Strategy and Joint Project Review is not required for the proposed Project. Further, the biological study area does not fall within any Public/Quasi-Public (PQP) or other MSHCP Conserved Lands. (BLUE, p. 9.) Therefore, the proposed Project would be consistent with Section 6.1.1 of the MSHCP.

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

Volume I, Section 6.1.2 of the MSHCP requires that projects develop avoidance alternatives, if feasible, that would allow for full or partial avoidance of riparian/riverine areas. Section 6.1.2 of the MSHCP defines riparian/riverine areas as "lands which contain Habitat dominated by trees, shrubs, persistent emergent, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source; or areas with fresh water flow during all or a portion of the year." The Project's biological study area does not support any riparian, riverine, or vernal pool habitats and no species associated with these habitat types were observed within the Project site. (BLUE, p. 8.) As such, no focused surveys or an MSHCP DBESP are required. Thus, the proposed Project would be consistent with Section 6.1.2 of the MSHCP.

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

Volume I, Section 6.1.3 of the MSHCP requires that within identified Narrow Endemic Plant Species Survey Areas, site-specific focused surveys for Narrow Endemic Plant Species will be required for all public and private projects where appropriate soils and habitat are present. The Project site is not located within a predetermined survey area for MSHCP Narrow Endemic Plant Species. Additionally, since the Project site is fully developed and the off-site improvement area is disturbed, the Project site and off-site improvement area do not provide suitable habitat for Narrow Endemic Plant Species. Therefore, there is no potential for occurrence and no additional surveys are required. (BLUE, p. 7.) Thus, the proposed Project would be consistent with MSHCP Section 6.1.3.

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

Section 6.1.4 outlines the minimization of indirect effects associated with locating development in proximity to a MSHCP Conservation Area that includes approximately 500,000 acres comprised Public/Quasi-Public Lands and Additional Reserve Lands. The biological study area is not located adjacent to an existing or proposed MSHCP Conservation Area. (BLUE, p. 9.) Thus, the Project would be consistent with Section 6.1.4 of the MSHCP.

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

The MSHCP requires additional surveys for certain species if a project or its off-site impact area are located within Criteria Areas shown on Figure 6-2 (Criteria Area Species Survey Area), Figure 6-3 (Amphibian Species Survey Areas with Critical Area), Figure 6-4 (Burrowing Owl Survey Areas with Criteria Area) and Figure 6-5 (Mammal Species Survey Areas with Criteria Area) of the MSHCP.

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

The Project site is located within the MSHCP Burrowing Owl Survey Areas. As part of the Project's *Biological Assessment Report for the 100 and 200 Sinclair Project*, habitat assessments were completed for burrowing owls according to the Burrowing Owl Survey Instructions for the Western Riverside County Multiple Species Habitat Conservation Plan Area. Thus, the Project implementation would be consistent with Section 6.3.2.

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

The MSHCP lists standard best management practices and guidelines to be implemented during project construction that will minimize potential impacts to sensitive habitats in the vicinity of a project. The guidelines relate to water pollution and erosion control, equipment storage, fueling, and staging, dust control, exotic plant control and timing of construction. The Project applicant would be required to implement measures from Appendix C (Standard Best Management Practices) and Section 7.5.3 (Construction Guidelines). Implementation of Project-specific mitigation measures **MM BR 1** and **MM BR 2** would address potential construction impacts. Thus, with mitigation the proposed Project would be compliant with Appendix C and Section 7.5.3 of the MSHCP.

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

References: BFSA-A, PVCCSP EIR, CHSC

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

There are no Standards and Guidelines included in the PVCCSP related to cultural resources. By preparing the Phase I Cultural Resources Assessment report, further discussed in this analysis, the Project has complied with the following applicable PVCCSP EIR mitigation measure:

> **MM Cultural 1**: Prior to the consideration by the City of Perris of implementing development or infrastructure projects for properties that are vacant, undeveloped, or considered to be sensitive for cultural resources by the City of Perris Planning Division, a Phase I Cultural Resources Study of the subject property prepared in accordance with the protocol of the City of Perris by a professional archeologist shall be submitted to the City of Perris Planning Division for review and approval. The Phase I Cultural Resources Study shall determine whether the subject implementing development would potentially cause a substantial adverse change to any significant paleontological, archaeological, or historic resources. The Phase I Cultural Resources Study shall be prepared to meet the standards established by Riverside County and shall, at a minimum, include the results of the following:
>
> 1. Records searches at the Eastern Information Center (EIC), the National or State Registry of Historic Places and any appropriate public, private, and tribal archives.
> 2. Sacred Lands File record search with the NAHC followed by project scoping with tribes recommended by the NAHC.
> 3. Field survey of the implementing development or infrastructure project site.
>
> The proponents of the subject implementing development projects and the professional archaeologists are also encouraged to contact the local Native American tribes (as identified by the California Native Heritage Commission and the City of Perris) to obtain input regarding the potential for Native American resources to occur at the project site.

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

1. Avoidance.
2. Changes to the structure provided pursuant to the Secretary of Interior's Standards.
3. Relocation of the structure.
4. Recordation of the structure to Historic American Buildings Survey (HABS)/Historic American Engineering Record (HAER) standard if demolition is allowed. Avoidance is the preferred treatment for known significant prehistoric and historical archaeological sites, and sites containing Native American human remains. Where feasible, plans for implementing projects shall be developed to avoid known significant archaeological resources and sites containing human remains. Where avoidance of construction impacts is possible, the implementing projects shall be designed and landscaped in a manner, which would ensure that indirect impacts from increased public availability to these sites are avoided. Where avoidance is selected, archaeological resource sites and sites containing Native American human remains shall be placed within permanent conservation easements or dedicated open space areas.

The Phase I Cultural Resources Study submitted for each implementing development or infrastructure project shall have been completed no more than three (3) years prior to the submittal of the application for the subject implementing development project or the start of construction of an implementing infrastructure project.

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

EXPLANATION OF CHECKLIST ANSWERS

5a. **No impact.** In compliance with PVCCSP EIR mitigation measure **MM Cultural 1,** a *Phase I Cultural Resources Assessment*, dated November 15, 2023, was prepared by BFSA Environmental Services (BFSA-A) and is included as Appendix D of this Initial Study. Prior to conducting the archaeological survey, an archeological records search was conducted at the Eastern Information Center at the University of California Riverside. The records search included a review of recorded historic properties (prehistoric and historic archaeological sites, historic buildings, structures, objects, or districts) within the Project site and a one-mile radius around the Project site that are on file at the Eastern Information Center.

According to the Eastern Information Center records search results, there have been 48 cultural resource studies conducted within a one-mile radius of the Project site, which included the off-site improvement area. Two of these studies covered the Project site and the off-site improvement area. (BFSA-A, pp. 30-31.) BFSA reviewed the records search information obtained from the Eastern Information Center and did not identify any resources within the Project site and the off-site improvement area; however, 14 resources on file with the Eastern Information Center are located within one mile of the Project site. All of the resources are historic. These resources include: the Perris Indian School (1892–1904); and Smith-Lowery Farm (circa 1910); historic farm equipment; the J.B. Mayer Ranch; historic Quonset huts; the mapped

alignment of the Colorado River Aqueduct; railway tracks; a structure pad; a historic foundation with access road and well; two water conveyance systems; the recorded location of the now demolished Val Verde Elementary; a well; rash scatter; and a segment of the Perris Valley Storm Drain. (BFSA-A, pp. 30-31.) The proposed off-site improvement area, which includes portions of Sinclair Street between Perris Boulevard and Johnson Avenue, are adjacent to a recent recorded Colorado River Aqueduct alignment. However, no historic surface elements or character defining features associated with the Colorado River Aqueduct extend into or are visible from the off-site improvement area. (BFSA-A, p. 31.)

BFSA also reviewed additional sources including: the National Register of Historic Places Index; the Office of Historic Preservation Archeological Determinations of Eligibility and Directory of Properties in the Historic Property Data File; the 30-minute USGS Elsinore topographic map (1901); the 7.5 minute Perris topographic maps (1954, 1969, 1980); Riverside County Assessor's parcel maps; Transportation and Land Management Agency records; and aerial photographs (from 1938 through 2021). (BFSA-A, p. 25.) Based on the aerial photographs and maps of the area, the Project site and adjacent parcels were traditionally utilized for agriculture throughout late 1997. Between 1997 and 2002, the industrial buildings and parking lots that now occupy the Project site were constructed. As such, the current improvements at the Project site are considered modern and not old enough to be considered as a historical resource. (BFSA-A, pp. 25.)

A systematic pedestrian survey was conducted by BFSA on February 14, 2022, July 13, 2022, and June 7, 2023. The Project site survey was constrained by the existing structures and parking lots, which left little ground surface available to inspect. At the time of the surveys, some areas of the property were fenced off and inaccessible; however, visual inspection of these areas indicated that they were fully developed. Vegetation at the Project site primarily consisted of non-native trees, weeds, and grasses. A modern storm drain culvert was noted along Perris Boulevard that seems to provide drainage under North Perris Boulevard. The paved alignments of west Sinclair Street, Barrett Avenue, and north Perris Boulevard were also surveyed. Barrett Avenue, located to the west of the Project site, is currently being used by an existing warehouse development to the west of the Project site and was inaccessible at the time of the surveys. All exposed ground was inspected for cultural materials. (BFSA-A, p. 32.)

No cultural resources, either historic or prehistoric, were identified during the records search or discovered during the surveys. (BFSA p. 33.)

As documented in the *Phase I Cultural Resources Assessment*, the historical research search and the pedestrian survey did not identify any historical resources within the Project site or the off-site improvement area. Therefore, no impacts to historic resources would occur.

5b. **Less than significant with mitigation.** As discussed in *Section 5a* above, a total of 14 cultural resources were recorded within one mile of the Project site; however, none were recorded within the Project site or the off-site improvement area. BFSA requested a Sacred Lands File records search from the Native American Heritage Commission (NAHC). The results of the Sacred Lands File search indicated the presence of sacred sites and/or locations of religious or ceremonial importance in the vicinity of the Project site. (BFSA-A, pp. 31-32.) The Assembly Bill (AB) 52 consultation efforts by the City and discussion about the AB 52 consultation is addressed under Section 5.18 – Tribal Cultural Resources of this Initial Study.

The pedestrian survey conducted by BFSA, did not identify any archeological resources within the Project site or the off-site improvement area. Nonetheless, there is the potential that previously unidentified archaeological resources may be discovered during construction-related ground disturbance for the Project. Therefore, Project-specific mitigation measure **MM CR 1**[4] shall be implemented to reduce potential impacts related to archaeological resources to a less than significant level.

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

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

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

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

- An agreement that artifacts will be reburied on-site and in an area of permanent protection;

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

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

The Project proponent/developer shall submit a fully executed copy of the agreement to the City of Perris Planning Division to ensure compliance with this condition of approval. Upon verification, the City of Perris Planning Division shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.

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

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

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

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

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

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

5c. Less than significant with mitigation. The proposed Project site and off-site improvement area had been used for agriculture purposes until 1997 and developed between 1997 and 2002 to its existing developed condition. (BFSA-A, p. 6.) No known cemetery has occurred at this site, so it is not expected to contain human remains, including those interred outside of formal cemeteries. However, the potential exists for previously unknown human remains to be discovered at the Project site and off-site improvement area during project construction activities. Project specific mitigation measure **MM CR 2**[5] would be implemented to ensure that any human remains that might be discovered at the Project site and off-site improvement area are treated appropriately pursuant to Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the California Public Resources Code. (CHSC). With adherence to existing laws and regulations, and implementation of mitigation measure **MM CR 2**, impacts with regard to the disturbance of human remains would be less than significant.

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

If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the "Most Likely Descendent" (MLD).[6] Despite the affiliation with any Native American representatives at the site, the NAHC's identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of Native American human remains and may recommend to the Project proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave

[5] Project-specific mitigation measure **MM CR 2** replaces PVCCSP EIR mitigation measure **MM Cultural 6**.
[6] The "Most Likely Descendent" (MLD) is a reference used by the California Native American Heritage Commission to identify the individual or population most likely associated with any human remains that may be identified within a given project area. Under California Public Resources Code, Section 5097.98, the Native American Heritage Commission has the authority to name the MLD for any specific project and this identification is based on a report of Native American remains through the County Coroner's office. The City of Perris will recognize any MLD identified by the Native American Heritage Commission without giving preference to any particular population. In cases where the Native American Heritage Commission is not tasked with the identification of a Native American representative, the City of Perris reserves the right to make an independent decision based upon the nature of the proposed project.

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

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

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

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

APPLICABLE STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

Conservation Element

Goal VIII	Create a vision for energy and resource conservation and the use of green building design for the City which provides for the protection of the environment while improving the quality of life and promoting sustainability.
Policy VIII.A	Adopt and maintain development regulations, which encourage water and resource conservation.
Measure VIII.A.2	Use indigenous and/or drought-resistant planting and efficient irrigation systems with smart controls in all new and refurbished commercial and industrial development projects. Also, restrict use of turf to 25% or less of the landscaped areas.
Measure VIII.A.4	Use gray water, and water-conserving appliances and fixtures within all new commercial and industrial developments.
Policy VIII.C	Adopt and maintain development regulations which encourage increased energy efficiency in buildings, and the design of durable buildings that are efficient and economical to own and operate. Encourage green building development by establishing density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who meet LEED building standards for new and refurbished developments (U.S. Green Building Council's Leadership in Energy and Environmental Design green building programs).
Measure VIII.C.3	Encourage the design and construction of durable buildings that are efficient and economical to own and operate.

Measure VIII.C.4	Review new development projects for compliance with the design guidelines contained within the Sustainable Community section through Conditions of Approval and a finding that the project conforms to the General Plan.
Measure VIII.C.5	Encourage green building density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who meet LEED building standards for new developments.
Goal IX	Encourage project designs that support the use of alternative transportation facilities.
Policy IX.A	Encourage land uses and new development that support alternatives to the single occupant vehicle.
Measure IX.A.1	Encourage installation of shared vehicle parking and support facilities within new and refurbished commercial and industrial developments, i.e., dual fuel vehicles and charging systems on site, car pool parking, and bus stop shelters.
Measure IX.A.2	Install bicycle paths and create secure and accessible bicycle storage for visitors and occupants within new and refurbished commercial and industrial developments.
Measure IX.A.4	Encourage building and site designs that facilitate pedestrian activity, such as locating buildings close to the street and providing direct connections to public walkways and neighboring land uses.
Measure IX.A.5	The City shall require all new public and private development to include bike and walking paths wherever feasible.
Goal X	Encourage improved energy performance standards above and beyond the California Title 24 requirements.
Policy X.A	Establish density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who exceed current Title 24 requirements for new development.
Policy X.B	Encourage the use of trees within project design to lessen energy needs, reduce the urban heat island effect, and improve air quality throughout the region.
Policy X.C	Encourage strategic shape and placement of new structures within new commercial and industrial projects.
Measure X.C.1	Promote energy conservation by taking advantage of natural site features such as natural lighting and ventilation, sunlight, shade and topography during the site plan process.
Measure X.C.2	When possible, locate driveways and parking on the east and north sides of buildings to reduce heat buildup during hot afternoons.

Healthy Community Element

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

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

13.3.5 LEED Certification Eligibility

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

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

EXPLANATION OF CHECKLIST ANSWERS

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

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

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

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

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

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

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

Construction

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

Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix and usage factors provided in the CalEEMod construction output files as part of the *Air Quality/Greenhouse Gas Analysis* included in Appendix A of this Initial Study. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour included in Table A9-3-E of the South Coast AQMD CEQA Air Quality Handbook. Fuel consumption from construction worker and vendor/delivery trucks was calculated using the trip rates and distances provided in the CalEEMod construction output files. Total vehicle miles traveled (VMT) was then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor using California Air Resources Board's EMFAC 2021 model. EMFAC provides the total annual VMT and fuel consumed for each vehicle type. Consistent with CalEEMod, construction worker trips were assumed to include 25 percent light duty gasoline auto and 75 percent light duty gasoline trucks. Construction vendor trucks were assumed to be medium-duty and heavy-duty diesel trucks. Hauling trucks were assumed to be heavy-duty diesel trucks. Please refer to Appendix K of this Initial Study for detailed calculations.

As shown below in **Table H**, a total of approximately 114,239 gallons of diesel fuel and approximately 51,501 gallons of gasoline are estimated to be consumed during Project construction.

Table H – Construction Energy Use[a]

Fuel	Fuel Consumption
Diesel	
On-Road Construction Trips[b]	81,937 Gallons
Off-Road Construction Equipment[c]	32,302 Gallons
Diesel Total	**114,239 Gallons**
Gasoline	
On-Road Construction Trips[b]	51,501 Gallons
Off-Road Construction Equipment[d]	-- Gallons
Gasoline Total	**51,501 Gallons**

Notes:

[a] Source: Table 1 – Total Construction-Related Fuel Consumption, Appendix K of this Initial Study.

[b] On-road mobile source fuel use based on vehicle miles traveled (VMT) from CalEEMod for construction in 2024 and fleet-average fuel consumption in gallons per mile from EMFAC2021 web-based data for Riverside County. See Table 2 – On Road Construction Trip Estimates, Appendix K of this Initial Study for calculation details.

[c] Off-road mobile source fuel usage based on a fuel usage rate of 0.05 gallons of diesel per horsepower (HP)-hour, based on South Coast AQMD CEQA Air Quality Handbook, Table A9-3E.

[d] All emissions from off-road construction equipment were assumed to be diesel.

Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Construction equipment is also required to comply with regulations limiting idling to five minutes or less (13 CCR § 2449(d)(3)), which is included in PVCCSP EIR mitigation measure **MM Air 4**, as described in *Section 5.3* of this Initial Study. Furthermore, there are no unusual Project site characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the State. For comparison, the State of California consumed 13.9 billion gallons of gasoline and 3.2 billion gallons of diesel fuel in 2022, which is the most recent published data (CAL-A). Thus, the fuel usage during Project construction would account for a negligible percent of the existing gasoline and diesel fuel related energy consumption in the State of California. Furthermore, it is expected that construction-related fuel consumption associated with the Project would not be any more inefficient, wasteful, or unnecessary than at other construction sites in the region.

Operation

The Project would promote building energy efficiency through compliance with energy efficiency standards (Title 24 and the CALGreen Code). The Project proponent has also committed to achieve LEED “Certified” status for the proposed building. The Project would also reduce vehicle fuel usage due to compliance with regulatory programs and Project design features that reduce VMT. AB 1493 ("the Pavley Standards") requires reduction in greenhouse gas (GHG) emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 and after. Executive Order S-01-07 went into effect in 2010 and required a reduction in the carbon intensity of transportation fuels used in California by at least 10 percent by 2020. The Executive Order imposes fuel requirements on fuel that will be sold in California that will decrease GHG emissions by reducing the full fuel-cycle and the carbon intensity of the transportation fuel pool in California. The Advanced Clean Cars I and II program, first introduced in 2012, combines the control of smog, soot causing pollutants and greenhouse gas emissions into a single coordinated package of requirements for model years 2017 through 2035.

For operational activities, annual electricity and natural gas consumption were calculated using demand factors provided in the CalEEMod output as part of the greenhouse gas analysis

included in Section 5.8, Greenhouse Gas Emissions, of this Initial Study and are based on the 2019 Title 24 standards. The Project site's electrical consumption was estimated to be approximately 7,549,364 kilowatt-hours (kWh) of electricity per year[7], this is the sum of the building electricity (2,364,610 kWh per year), the electricity demand for the 25 EV charging stations (4,106,250 kWh per year), electricity demand for 51 forklifts (991,746 kWh per year), electricity demand for two yard trucks (61,320 kWh per year), and electricity related to the Project's water consumption (25,438 kWh per year). The electricity usage from the future EV charging stations serving the Project site's designated EV charging spaces were estimated outside CalEEMod. Electricity demand was estimated using data from the South Coast AQMD for EV charging station usage and the CalEEMod default carbon intensity data from utility provider. The number of EV chargers at each charging station and the usage are unknown. Therefore, it was assumed that each designated EV charging space would contain one charger and, based on South Coast AQMD[8] data, that each charger would be a 50 kilowatt charger used approximately 10 hours per day or five separate two-hour charging events. Based on these assumptions, each EV charger would use approximately 450 kWh of electricity per day. Details for the forklift and yard truck assumptions and calculations are located in Table 3 – Annual Energy Consumption from Operation, Appendix K. The Project's natural gas consumption was estimated to be approximately 8,156,638 kilo-British thermal units or approximately 81,566 therms.

Southern California Edison (SCE), one of the nation's largest electric utilities, provides service to the City, including the Project site, as reported by the California Energy Commission, SCE consumed approximately 81 billion kWh in 2021 (CEC-A). The Southern California Gas Company (SoCalGas) provides natural gas service to the City. As reported by the California Energy Commission, SoCalGas consumed approximately 5.1 billion therms in 2021 (CEC-B). At full build-out, the Project site's electricity demand would be a negligible amount of the existing electricity and the natural gas demand would be a negligible percent of the existing natural gas use in SoCalGas' service area.

Energy impacts associated with transportation during operation were also assessed using the traffic data contained in the greenhouse gas analysis included in *Section 5.8, Greenhouse Gas Emissions*, of this Initial Study. Based on the annual VMT, gasoline and diesel consumption rates were calculated using the Riverside County-specific miles per gallon in EMFAC2021. As shown below in **Table I – Annual Fuel Consumption**, a total of approximately 159,462 gallons of gasoline fuel and approximately 115,563 gallons of diesel fuel is estimated to be consumed each year. As stated above, the State of California consumed approximately 13.9 billion gallons of gasoline and 3.2 billion gallons of diesel fuel in 2022. Thus, the annual fuel usage during Project operation would account for a negligible percent of the existing gasoline and diesel fuel related energy consumption in California.

[7] Per Table 3 – Annual Energy Consumption from Operation, Appendix K of this Initial Study.

[8] South Coast AQMD's Final Staff Report for Proposed Rule 2305 and Proposed Rule 316, May 2021. Available at http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10.

Table I – Annual Fuel Consumption

Fuel Type[b, c]	Fuel Consumption (gallons/year)
Gasoline	159,462
Diesel	115,563

Notes:
[a] Source: Table 3 - Annual Energy Consumption from Operation, Appendix K of this Initial Study.
[b] Mobile source fuel use based on annual vehicle miles traveled (VMT) from CalEEMod output (Appendix A) for operational year 2025 and fleet-average fuel consumption in gallons per mile from EMFAC2021 data in Riverside County.

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

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

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

As addressed above, the Project's anticipated electricity consumption is minimal in comparison to SCE's supply. The Project would comply with applicable state, SCE, and Perris General Plan goals and policies that require energy conservation within the Project site. As discussed above, SCE's total electricity consumption was approximately 81 billion kWh in 2021. The Project demand would be a negligible amount of SCE's existing electricity use. As such, there would be adequate capacity to serve the proposed Project.

As addressed above, the Project's natural gas consumption was estimated to be approximately 8,156,638 kilo-British thermal units per year (or 81,566 therms per year). The Project would comply with applicable California Public Utilities Commission, state, SoCalGas, and Perris General Plan goals and policies that require energy conservation within the Project area. As discussed above, the Project demand would be a negligible percent of SoCalGas' existing natural gas use. As the proposed Project's overall consumption of natural gas use is comparatively insignificant to existing SoCalGas-wide use and as SoCalGas continuously expands its network, as needed, to meet the need in Southern California, there would be adequate capacity to serve the proposed Project. The Project would therefore not have a significant effect on local and regional energy supplies.

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

As described above, SCE produced approximately 81 billion kWh in 2021, and the Project is expected to have a negligible impact to SCE's total electricity usage. Therefore, it can be stated that the Project would not have a substantial effect on energy supplies.

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

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

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

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

Through implementation of energy conservation measures and sustainable practices, the Project would not use large amounts of energy in a manner that is wasteful or otherwise inconsistent with adopted plans or policies.

5. The effects of the project on energy resources.

The effects of the Project on energy supplies and resources from a capacity standpoint are described above in the preceding analysis. Regarding the effects of the Project on energy resources, the Project would be required to comply with California Title 24 and CalGreen Standards, Renewable Portfolio Standards, Pavley standards and the Advanced Clean Cars Program.

Additionally, PVCCSP EIR mitigation measure **MM Air 20** would reduce electricity consumption associated with the Project.

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

As stated above, energy impacts associated with transportation during construction and operation of the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy through adherence to existing regulations and implementation of design features and mitigation measures. Regarding efficient transportation alternatives, alternative transportation choices would be provided because the Project site is near Riverside Transit Agency (RTA) bus routes. The nearest bus stops, Route 41 and Route 19, are approximately 0.11 mile south of the Project site, near the intersection of Perris Boulevard and Commerce Center Drive. Additionally, the Project would comply with CalGreen requirements and, pursuant to PVCCSP EIR mitigation measures **MM Trans 5** and **MM Air 14**, provide bike racks and carpool/vanpool parking stalls. Therefore, impacts would be less than significant.

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

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

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

References: SCGEO-A, COR GP, GP, PVCCSP, PVCCSP EIR

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

There are no PVCCSP Standard and Guidelines applicable to the analysis of geology and soils. By preparing the *Geotechnical Investigation, 100-200 West Sinclair Street,* dated August 8, 2022 (included as Appendix E.1 of this Initial Study) and herein referred to as the "Geotechnical Report," the Project proponent has complied with the following applicable PVCCSP EIR mitigation measure:

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

EXPLANATION OF CHECKLIST ANSWERS

7a(i). **No impact.** Surface rupture presents a primary or direct potential hazard to structures built across an active fault trace. The Project site and the off-site improvement area are not located within an Alquist-Priolo Earthquake Fault Zone. (PVCCSP EIR, p. 4.5-6 and SCGEO, p. 11.) Therefore, although seismic activity is known to exist throughout Southern California, there are no known faults through or near the Project site that would result in substantial effects. Therefore, no impact would occur and no mitigation is required.

7a(ii). **Less than significant impact.** As mentioned above, the Project site and the off-site improvement area are not within an Alquist-Priolo Earthquake Fault Zone. However, since ground shaking and earthquake activity is typical of the Southern California area, the proposed Project's design would be consistent with the recommended seismic parameters included in the Geotechnical Report. Additionally, the Project's design would be designed according to the current California Building Code, which require structures to be designed to meet or exceed the seismic safety standards set forth therein. Therefore, ground-shaking impacts would be less than significant and no mitigation is required.

7a(iii). **Less than significant impact.** Liquefaction occurs when shallow, fine to medium-grained sediments saturated with water are subjected to strong seismic ground shaking. It generally occurs when the underlying water table is 50 feet or less below the surface. (GP, p. SE-9.) The Riverside County Geographic Information System website indicates that the Project site and the off-site improvement area are located within a zone of moderate liquefaction susceptibility. The Geotechnical Report indicates that the subsurface conditions encountered at the boring locations at the Project site are not considered to be conducive to liquefaction. (SCGEO, p.13.) Additionally, the Project's design would meet or exceed the seismic standards in the current California Building Code. Therefore, potential liquefaction impacts would be less than significant and no mitigation is required.

7a(iv). **No impact.** A combination of geologic conditions leads to landslide vulnerability. These include deep-seated landslides or shallow earth flows, slumps, slides, or rockfall. The Project site and the off-site improvement area are located in an area that is flat and is not susceptible to possible landslide or rockfall runout zones areas. (PVCCSP EIR, Figure 4.5-4). Therefore, no impacts would occur and no mitigation is required.

7b. **Less than significant impact.** Once construction of the proposed Project is complete, most of the Project site would be paved and developed with a warehouse/distribution facility, parking lots, landscaping, and a water quality detention basin and the off-site improvement area would be paved; therefore, no soil erosion is anticipated from long-term operation of the Project.

Construction activities have the potential to result in soil erosion or the loss of topsoil. However, erosion would be addressed through the implementation of existing State and Federal requirements and minimized through compliance with the NPDES general construction permit, which requires that a Storm Water Pollution Prevention Plan (SWPPP) be prepared prior to and implemented during construction activities. The SWPPP will identify Best Management Practices to be implemented to address soil erosion. Through compliance with these standard regulatory requirements, the construction of the proposed Project is not anticipated to result in substantial soil erosion or the loss of topsoil. Therefore, impacts would be less than significant and no mitigation is required.

7c. **Less than significant impact.** As discussed above in *Section 7a(iii*), the proposed Project site and the off-site improvement area are located in an area that has been previously determined to have a low potential for liquefaction. Likewise, as discussed above in *Section 7a(iv)*, landslides do not pose a significant risk at the Project site or the off-site improvement area. (PVCCSP EIR, Figure 4.5-4.)

Lateral spreading is a phenomenon in which soils move laterally during seismic shaking and is often associated with liquefaction. The amount of movement depends on the soil strength, duration and intensity of seismic shaking, topography, and free face geometry. According to the Geotechnical Report, there is low potential for lateral spreading to occur within the Project site. (SCGEO, p.11.) It can be reasonably concluded that the off-site improvement area that is a few feet from the Project site would also have a low potential for lateral spreading.

Seismic ground subsidence (not related to liquefaction induced settlements) occurs when strong earthquake shaking results in the densification of loose to medium density sandy soils above groundwater. The Geotechnical Report indicates there is low potential for subsidence to occur within the Project site. (SCGEO, p. 11.) Adherence to the measures identified in the California Building Code, applicable standards of the City's Grading Ordinance, and the recommendations in the Geotechnical Report would reduce impacts resulting from unstable soil conditions to less than significant levels and no mitigation is required.

7d. **Less than significant impact.** The Geotechnical Report indicates that the Project site is underlain by low expansive soils that carries minor additional risk with respect to flatwork movement and potential distress. Accordingly, the Geotechnical Report recommends design parameters for moisture conditioning and additional steel reinforcement in the flatwork areas in order to minimize the potential effects of the expansive soils. (SCGEO-A, p. 17.) The Project applicant would be required to prepare and submit detailed grading plans and building plans for the proposed Project prior to issuance of a grading permit. Said plans must be prepared in conformance with applicable standards of the City's Grading Ordinance and the recommendations in either the Geotechnical Report or a subsequent geotechnical report. Development of the Project site consistent with the recommendations included in the Geotechnical Report (or a subsequent geotechnical report) would reduce potential impacts from expansive soils to a less than significant level and no mitigation is required.

7e. **No impact.** The two industrial buildings on the Project site are currently served by EMWD's existing sewer system. Like the existing uses, the proposed Project would connect to the existing sewer system and would not require use of a septic tank. No impact would occur.

7f. **Less than significant impact with mitigation.** A *Paleontological Resource Assessment for the 100 and 200 West Sinclair Street Project* (Paleontological assessment), dated November 15, 2023, was prepared by BFSA Environmental Services (BFSA) and is included as Appendix E.2 of this Initial Study. The Project site and off-site improvement area is located on lower Pleistocene very old, sandy, alluvial-fan deposits. (BFSA-B, p. 9.) Pleistocene (greater than 11,700 years old) alluvial and alluvial fan deposits in the Inland Empire often yield important Ice Age terrestrial vertebrates fossils and sediments are considered to have a High paleontological resources sensitivity. (BFSA-B, p. 9-10). According to the Perris General Plan Conservation Element Exhibit CN-7: Paleontological Sensitivity, the Project site and off-site improvement area are within Paleontological Sensitivity Area 1 (High Sensitivity) and exhibits surface exposures of older Pleistocene valley deposits which have high potential to contain significant fossil resources. (Conservation Element, pp. 26-27.)

As part of the Paleontological assessment, a paleontological review and field reconnaissance were conducted. A paleontological literature review and collections and locality records search was performed by the Western Science Center for the nearby Ramona Webster Project, located less than a mile northwest of the Project site. The record search indicated that the Western Science Center has no fossil localities within the project boundaries or within one mile of the Ramona Webster Project. Therefore, no fossil localities have been mapped within the Project site or within the boundaries of the off-site improvement area. (BFSA-B, p. 7.)

The field reconnaissance was performed by BFSA on February 14 and July 13, 2022. The surveys of the Project site were constrained by the existing structures and parking lots, which left little ground surface available to inspect. Some areas of the Project site were fenced off and inaccessible, however visual inspection of these areas indicated that they were also fully developed. No fossils were discovered on the Project site.

Because of the high paleontological sensitivity assigned to the Project site, the depth of potential ground disturbance, a Paleontological Resource Impact Mitigation Monitoring Program shall be prepared and approved in conformance with Conservation Element implementation measure IV.A.4 which requires paleontological monitoring of all projects once subsurface excavation begins, as set forth in Project-specific mitigation measure **MM GEO 1.**[9] Thus, with implementation of mitigation measure **MM GEO 1**, potential impacts with regard to directly or indirectly destroying a unique paleontological resource or site or unique geologic feature would be reduced to less than significant.

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

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

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.

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

References: CARB-C, CARB-D, CAP, WEBB-A

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

8a. **Less than significant impact.** Greenhouse Gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation and temperature. Although there is disagreement as to the speed of global warming and the extent of the impacts attributable to human activities, most agree that there is a direct link between increased emission of GHGs and long-term global temperature. What GHGs have in common is that they allow sunlight to enter the atmosphere but trap a portion of the outward-bound infrared radiation and warm up the air. The process is similar to the effect a greenhouse has in raising the internal temperature, hence the name greenhouse gases. Both natural processes and human activities emit GHGs. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature; however, it is the scientific consensus that emissions from human activities such as electricity generation and motor vehicle operations have elevated the concentration of GHGs in the atmosphere. This accumulation of GHGs has contributed to an increase in the temperature of the earth's atmosphere and contributed to global climate change.

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H_2O). CO_2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2E).

There are several unique challenges to analyzing greenhouse gas emissions and climate change under CEQA, largely because of climate change's "global" nature. Typical CEQA analyses address local actions that have local—or, at most, regional—impacts, whereas climate change presents the considerable challenge of analyzing the relationship between local activities and the resulting potential, if any, for global environmental impacts. Most environmental analyses examine the "project-specific" impacts that a particular project is likely to generate. With regard

to global warming, however, it is generally accepted that while the magnitude of global warming effects may be substantial, the GHG emissions from a single general development project would have no noticeable effect on global climate.

Global climate change is also fundamentally different from other types of air quality impact analyses under CEQA in which the impacts are all measured within, and are linked to, a discrete region or area. Instead, a global climate change analysis must be considered on a global level, rather than the typical local or regional setting, and requires consideration of not only emissions from the project under consideration, but also the extent of the displacement, translocation, and redistribution of emissions. In the usual context, where air quality is linked to a particular location or area, it is appropriate to consider the creation of new emissions in that specific area to be an environmental impact whether or not the emissions are truly "new" emissions to the overall globe. When the impact is a global one, however, it makes more sense to consider whether the emissions really are new emissions or are merely being moved from one place to another. For example, the approval of a new developmental plan or project does not necessarily create new automobile drivers - the primary source of a land use project's emissions. Rather, due to the "relocation" factor, new land use projects sometimes merely redistribute existing mobile emissions; accordingly, the use of models that measure overall emissions increases without accounting for existing emissions will substantially overstate the impact of the development project on global warming. This makes an accurate analysis of GHG emissions substantially different from other air quality impacts, where the "addition" of redistributed emissions to a new locale can make a substantial difference to overall air quality.

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 CARB published some draft thresholds in 2008, they were never adopted, and CARB recommended that local air districts and lead agencies adopt their own thresholds for GHG impacts.

The South Coast AQMD has been evaluating GHG significance thresholds since April 2008. In December 2008, the South Coast AQMD adopted an interim 10,000 metric tons CO_2e ($MTCO_2e$) per year screening level threshold for stationary source/industrial projects for which the South Coast AQMD is the lead agency. The South Coast AQMD has continued to consider adoption of significance thresholds for residential and general development projects. The most recent proposal issued in September 2010 included significance thresholds for residential, commercial, and mixed-use projects at 3,500, 1,400, and 3,000 $MTCO_2e$ per year, respectively. Alternatively, a lead agency has the option to use 3,000 $MTCO_2e$ per year as a threshold for all non-industrial projects. Although both options are recommended by the South Coast AQMD, a lead agency is advised to use only one option and to use it consistently.

The thresholds identified above have not been adopted by the South Coast AQMD 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. The only update to the South Coast AQMD's GHG thresholds since 2010 is that the 10,000 $MTCO_2e$ per year threshold for industrial projects is now included in the South Coast AQMD's March 2023 South Coast AQMD Air Quality Significance Thresholds document that is published for use by local agencies.

In the absence of other thresholds of significance promulgated by the South Coast AQMD, the City of Perris has been using the South Coast AQMD's $MTCO_2e$ 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. The *Air Quality /Greenhouse Gas Analysis* prepared by Albert A. Webb Associates, dated July 18, 2023 (WEBB-A) (included as Appendix A of this Initial Study), estimated GHG emissions from construction (inclusive of all road and off-site improvements), area sources, energy (includes estimated electricity usage from forklift, yard truck, and EV charging station), mobile sources, solid waste and water-related energy usage. Evaluation of the data presented in **Table J – Total Project-Related Operational GHG Emissions**, below indicates that the total GHG emissions generated from the Project is approximately 4,242.16 $MTCO_2e$ per year, which includes construction-related emissions amortized over a typical project life of 30 years.

Table J – Total Project-Related Operational GHG Emissions

Source	Metric Tons per year				
	CO_2	CH_4	N_2O	R	Total CO_2e
Amortized Construction	--	--	--	--	54.40
Area	17.90	0.00	0.00	0.00	18.00
Energy	807.00	0.08	0.00	0.00	1,463.12
Mobile	2,506.00	0.08	0.21	3.79	2,574.00
Solid Waste	35.80	3.58	0.00	0.00	125.00
Water	4.86	0.09	0.00	0.00	7.64
Total	**3,371.56**	**3.83**	**0.29**	**3.79**	**4,242.16**

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

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

8b. **Less than significant impact.** CEQA allows lead agencies to consider whether regulatory programs are adequate to reduce a project's potentially significant environmental effects. Under Assembly Bill (AB) 32, the State's emission inventory must be reduced to 1990 levels by 2020. Most of the reductions required to reach AB 32's 2020 reduction target will be achieved by regulations that apply to both existing and new development, including the Renewable Portfolio Standard, Pavley standards, Low Carbon Fuel Standards, landfill regulations, regulations and programs on high global warming potential gases, initiatives on water conservation (such as SB X7-7), and the indirect influence of the Cap and Trade system on electricity and transportation fuel prices. These regulations are sufficient to achieve AB 32's goal to reduce statewide GHG emissions to 1990 levels by 2020. The CARB 2017 Scoping Plan includes a regulatory strategy that will result in the State achieving the SB 32 target by 2030. (CARB-C). The CARB 2022 Scoping Plan addresses recent legislation (AB 1279) reducing anthropogenic GHG emissions to 85 percent below 1990 levels by 2045. (CARB-D).

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

transportation and reduced vehicle use; and solid waste measures that reduce landfilled solid waste in the City.

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

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

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

Airport Overlay Zone (from Chapter 12.0 of the PVCCSP)

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

12.1.1 Compatibility with March Air Reserve Base

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

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

Section 4.2.1, General On-site Project Development Standards and Guidelines, of the PVCCSP, also prohibits uses that could affect MARB, avigation easements, APZs, consistent with Section 12.

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

EXPLANATION OF CHECKLIST ANSWERS

9a. **Less than significant impact.** As identified in Section 4.6 of the PVCCSP EIR, new commercial and industrial uses in the PVCCSP area could involve the transport, use, storage, and disposal of hazardous materials. However, with required compliance with the regulations, standards, and guidelines established by the Environmental Protection Agency, the State, and City related to storage, use, and disposal of hazardous materials and the risk of the public's potential exposure to hazardous substances was determined to be less than significant. (PVCCSP EIR, p. 4.6-11.)

Impact Analysis for Temporary Construction Activities

Heavy equipment (e.g., dozers, excavators) would operate in the Project area during construction of the Project and associated improvements. Heavy equipment is typically fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located in the Project area during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the Project than would occur on any other similar construction site.

A number of federal and state agencies prescribe strict regulations for the safe transportation of hazardous materials. Hazardous material transport, storage and response to upsets or accidents are primarily subject to federal regulation by the United States Department of Transportation Office of Hazardous Materials Safety in accordance with Title 49 of the Code of Federal

Regulations. California regulations applicable to hazardous material transport, storage and response to upsets or accidents are codified in Title 13 (Motor Vehicles), Title 8 (Cal/OSHA), Title 22 (Management of Hazardous Waste), Title 26 (Toxics) of the California Code of Regulations (CCR), and the Chapter 6.95 of the Health and Safety Code (Hazardous Materials Release Response Plans and Inventory), which describes strict regulations for the safe transportation and storage of hazardous materials. Because construction contractors are required to comply with all applicable regulations Project construction would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase.

Impact Analysis for Long-Term Operational Activities

Operation of the Project would involve the use of materials common to all urban development that are labeled hazardous (e.g., solvents and commercial cleansers; petroleum products; and pesticides, fertilizers, and other landscape maintenance materials). The portion of the proposed Project site that would be developed with the warehouse/distribution facility has a PVCCSP land use designation of Light Industrial, which allows for assembly of non-hazardous products and materials. Because the exact tenants of the proposed building are unknown at this time, there is the potential that hazardous materials such as petroleum products, pesticides, fertilizer, and other household hazardous products may be stored and transported from the proposed facility. However, these hazardous materials would not be manufactured at the Project site and would only be stored short-term before transport.

Exposure of people or the environment to hazardous materials during operation of the Project may result from (1) the improper handling or use of common hazardous substances; (2) transportation accidents; or (3) an unforeseen event (e.g., fire, flood, or earthquake). The severity of any such exposure is dependent upon the type and amount of the hazardous material involved; the timing, location, and nature of the event; and the sensitivity of the individuals or environment affected. As discussed above, the U.S. Department of Transportation prescribes strict regulations for hazardous materials transport, as described in Title 49 of the Code of Federal Regulations (i.e., the Hazardous Materials Transportation Act); these are implemented by Title 13 of the California Code of Regulations. It is possible that vendors may transport hazardous materials to and from the Project; and the drivers of the transport vehicles must comply with the Hazardous Materials Transportation Act. Hazardous materials or wastes stored on site are subject to requirements associated with accumulation time limits, amounts, and proper storage locations and containers, and proper labeling. The amount of materials that would be handled at any one time for the proposed warehouse operations would be relatively small. Additionally, for removal of hazardous waste from the site, hazardous waste generators are required to use a certified hazardous waste transportation company which must ship hazardous waste to a permitted facility for treatment, storage, recycling, or disposal.

As the proposed Project would be required to comply with all applicable federal and state laws related to the transportation, use, storage and response to upsets or accidents that may involve hazardous materials would reduce the likelihood and severity of upsets and accidents during transit and storage, it is not expected to result in the use of large amounts of hazardous materials that would create a hazard to the public or environment.

Consistent with the conclusion of the PVCCSP EIR, through compliance with applicable regulations to federal and state regulations, the Project would result in a less than significant

impact related to a significant risk to the public or the environment through the potential routine transport, use, or disposal of hazardous materials. No mitigation measures are required.

9b. Less than significant impact. A *Phase I Environmental Site Assessment, 100 and 200 Sinclair Street, Perris, California,* was prepared for the Project site by Weis Environmental, LLC and is included as Appendix F of this Initial Study. The *Phase I Environmental Site Assessment* was prepared in accordance with the ASTM Designations E1527-21 Standard Practice for environmental site assessments, the previously published ASTM E1527-13, and Title 40 of the Code of Federal Regulations (40 CFR) Part 312 to evaluate the Project site for potential recognized environmental conditions. A database search was conducted for the Project site and one-mile radius which includes the off-site Improvement area.

The *Phase I Environmental Site Assessment* noted that the Project site was previously used for agricultural purposes prior to 2010 and there is the potential that various pesticides, and more specifically organochlorine pesticides commonly applied during the normal course of agricultural operations of the time, were used. (WEL, p. 19.) A site reconnaissance was conducted by Weis Environmental on June 21, 2022. The *Phase I Environmental Site Assessment* notes that the Project site is developed with two industrial buildings and associated parking, unpaved storage areas to the east of each building, and minor landscaping. (WEL, p. 4.) No recognized environmental condition was observed on the Project site during the site reconnaissance. (WEL p. 5.)

A review of the Federal, State and local environmental databases provided by Environmental Risk Information Services was conducted as part of the *Phase I Environmental Site Assessment* for information pertaining to documented and/or suspected releases of regulated hazardous substances and/or petroleum products of nearby properties. (WEL, p. 1.) A review of unplottable sites listed in the environmental database report were cross-referenced with referencing addresses and site names. (WEL, p. 12.) The Project site was listed in two regulatory databases, the Delisted County State ASTM regulatory database and the Recycling and Processors database, but due to being either inactive or operations deemed below reportable thresholds, or no releases reported, the existing uses at the Project site are not a recognized environment condition. (WEL, p. 14.) No adjoining properties were listed in state, Tribal, and/or local standard ASTM databases.

As discussed in *Section 9a* above, there is a potential for hazardous materials and chemicals to be stored at the site for short periods of time prior to transport and distribution which could cause a release. However, the storage and transport of these products would be regulated by Federal, State, and local policies regarding storage and transportation of hazardous waste. Therefore, because the Project site has been screened for any hazardous waste-related activities at the Project site, the off-site improvement area is not listed on any regulatory database, and since any hazardous waste-related activities for any future users at the Project site would be required to comply with all existing hazardous waste regulations, impacts regarding the creation of a significant hazard involving the release of hazardous materials into the environment would be less than significant and no mitigation is required..

9c. No impact. The closest school to the Project site and off-site improvement area is Val Verde Academy, which is approximately 0.78 mile to the west of the Project site and off-site improvement area; thus, the proposed Project site and off-site improvement area are not located within one-quarter mile of an existing or proposed school. Therefore, the proposed Project

would not emit hazardous emissions or handling hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; no impact would occur and no mitigation is required.

9d. **No impact.** Based on a review of the California Environmental Protection Agency's Cortese list, compiled pursuant to Government Code Section 65962.5, no hazardous materials sites are located within or adjacent to the Project site or the off-site improvement area. Additionally, the *Phase I Environmental Site Assessment* did not locate active or historical hazardous waste and substances sites at or adjacent to the Project site. (WEL; Appendix B). Therefore, no impact would occur.

9e. **Less than significant with mitigation.** The Project site and off-site improvement area are located approximately 1.6 miles southeast of MARB/IPA and are within the area subject to the MARB/IPA ALUCP. The MARB/IPA ALUCP divides the area close to the airport into zones based on proximity to the airport and perceived risks. The MARB/IPA ALUCP also indicates the allowable uses, potential noise impacts, potential safety impacts, and density/intensity restrictions for each zone.

The proposed Project site and offsite improvement area are within Zone B1. According to the MARB/IPA ALUCP, Zone B1 is within the accident Potential Zone (APZ) II within the inner approach and departure zone and the risk level from flight operations is high. The proposed Project is not required to go through Airport Land Use Commission (ALUC) review and consistency determination because: 1) the City created an Airport Overlay Zone component to the City's land use plan to accommodate development within the City consistent with the land use designations of the MARB/IPA ALUCP,[10] and 2) there is no legislative action (i.e., general plan amendment, specific plan amendment, or change of zone) required or proposed.

The City's noise compatibility standards in the Perris Municipal Code Section 19.51.080, prevents the establishment of noise-sensitive land uses such as new residences, schools, libraries, museums, hotels, motels, hospitals, nursing homes, places of worship, in portions of the airport environ that are exposed to significant levels of aircraft noise. The proposed Project site is in an area within the 60 and 65 dBA CNEL aircraft noise contour. (ALUCP, Table MA-4.) Since the proposed Project use is not a noise-sensitive land use, the proposed Project would not expose people working in the Project area to excessive noise levels from aircraft operations.

According to the MARB/IPA Basic Compatibility Criteria, Zone B1 APZ II, limits average intensity to 50 people per acre or 100 people per single acre and allows a maximum 50 percent lot coverage. The entirety of the proposed 423,224-square-foot industrial, non-refrigerated warehouse distribution facility use that includes a total of 8,000 square feet of office space would be located on approximately 9.81 acres. The following analyzes how the proposed Project complies with the density/intensity requirements of the MARB/IPA ALUCP.

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

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

- Warehouse – 35% of the usage intensity from 1 person/500 square feet,[11]
- Office – 50% of the usage intensity from 1/person/100 square feet,[12]

Based on the above usage intensity parameters, the warehouse and office building in Zone B1 APZ II could be occupied by a total of 337 people.[13] As noted above, these Zones allows an average of 100 people per acre; therefore, based on the approximately 9.81 net acre building site, the Project would have an average of 35 people per acre in Zone B1 APZII.[14]

Another measurement required by the MARB/IPA ALUCP, is a single-acre intensity limit. For Compatibility Zone B1 APZ II, the MARP/IPA ALUCP limits the maximum single-acre intensity to 100 people per acre. In order to determine if the Project fits within the 100 people per single acre limit, it was assumed in a worst-case calculation that in a single-acre (43,560 square feet), all the total office space (8,000 square feet) is within the single-acre and the remainder of the acre is warehouse (35,560 square feet of warehouse). This would equate to a total occupancy of 65 people (8,000 square feet of office / 100 square feet x 50% usage intensity plus 35,560 square feet of warehouse / 500 square feet x 35% usage intensity), which is consistent with the Compatibility Zone B1 single-acre intensity criterion of 100. Thus, the proposed Project would comply with the MARB/IPA ALUCP density requirements.

A second method for determining total occupancy involves multiplying the number of parking spaces provided or required (whichever is greater) by average vehicle occupancy (assumed to be 1.5 persons per vehicle and 1.0 for commercial vehicles). Based on the number of parking spaces provided (108 standard vehicles and 128 trailer spaces) the total occupancy would be estimated at 290 people for an average intensity of 30 people per acre, which is also less than the Compatibility Zone B1 average intensity criterion of 100 people per acre.

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

Zone B1 APZ II hazards to flight include physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations are prohibited. Land use development that may cause the attraction of birds to increase is also prohibited. According to the Perris Municipal Code Chapter 19.51 March ARB/IP Airport Overlay Zone, the proposed Project would not be required to obtain ALUCs approval, since the Project would comply with the airport influence area requirements.

Although impacts associated with aircraft activities would be less than significant, the proposed Project is required to comply with PVCCSP EIR mitigation measures **MM Haz 2** through **MM Haz 6** to reduce impacts associated with MARB/IPA operations. Therefore, the proposed Project

[11] 2.4(f)(1) of the MARRB/IPA ALUCP states that high-cube warehouses and distribution centers, other than e-commerce centers and fulfillment centers, shall be evaluated on the basis of 35% of the usage intensity that results from the occupancy level indicated in Table C1.

[12] 2.4(f)(3) of the MARRB/IPA ALUCP states that offices within high-cube warehouses, distribution centers, and commerce centers and fulfillment centers, shall be evaluated on the basis of 50% of the usage intensity that results from the occupancy level indicated in Table C1.

[13] Based on the rates noted above for warehouse and office uses, approximately 423,224 square feet of warehouse space would equate to 297 people (423,224 square feet/500 square feet/person x 35% usage intensity) and approximately 8,000 square feet of office would equate to 40 people (8,000 square feet/100 square fee/person x 50% usage intensity) within Zone B2.

[14] 337 people/9.81 acres = 35 people/acre in Zone B1 APZ II

would not result in a safety hazard to people working in the Project area and impacts would be less than significant with mitigation:

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

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 & Profession Code 11010 13(A)."

MM Haz 5: The following uses shall be prohibited:

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

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

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

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

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

MM Haz 6: A minimum of 45 days prior to submittal of an application for a building permit for an implementing development project, the implementing development project applicant shall consult with the City of Perris Planning

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

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

Once the Project is constructed, emergency access to the proposed Project site via Sinclair Street would be maintained, consistent with requirements outlined in the Local Hazard Mitigation Plan. Additionally, the proposed Project is consistent with the requirements outlined in the PVCCSP; therefore, the proposed Project would have a less than significant impact on the implementation of an adopted emergency response plan.

9g. **No impact.** Pursuant to the findings of the PVCCSP Initial Study, the proposed Project site is not adjacent to any wildlands or undeveloped hillsides where wildland fires might be expected. The California Department of Forestry and Fire Protection (CAL FIRE) has mapped fire threat potential throughout California. CAL FIRE ranks fire threats based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The Project site is in a Non-Very High Fire Hazard Severity Zone within a local responsibility area. Therefore, implementation of the proposed Project would not expose people or structures to risk of loss, injury or death involving wildland fires. No impact would occur.

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

References: DWR 2021, FEMA, GPEIR, PVCCSP EIR, SWRCB, FMC-A, FMC-B

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

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

4.2 On-Site Standards and Guidelines

4.2.2 Site Layout for Commerce Zones

4.2.2.7 Water Quality Site Design

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

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

- Design the site to minimize imperviousness, detain runoff, and infiltrate, reuse or evapotranspirate runoff where feasible.
- Cover or control sources of stormwater pollutants.
- Use LID to infiltrate, evapotranspirate, harvest and use, or treat runoff from impervious surfaces.
- Ensure runoff does not create a hydrologic condition of concern.
- Maintain Stormwater BMPs.

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

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

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

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

Minimize impervious area

- Disperse runoff to adjacent pervious areas
- Delineate drainage management areas
- Classify and Tabulate DMAs and determine runoff factors for

- Self-treating areas
- Self-retaining areas
- Areas draining to self-retaining areas
- Areas draining to BMPs on-site

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

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

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

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

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

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

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

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

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

Covered Trash Enclosures. Trash enclosures covers must be provided.

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

8.2 Industrial Development Standards and Guidelines

8.2.1 Industrial Site Layout

8.2.1.8 Water Quality Site Design

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

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

EXPLANATION OF CHECKLIST ANSWERS

10a. Less than significant impact. The Santa Ana Regional Water Quality Control Board (RWQCB) sets water quality standards for all ground and surface waters within the region including the City of Perris. Water quality standards are defined under the Clean Water Act to include both the beneficial uses of specific water bodies and the levels of water quality that must be met and maintained to protect those uses (water quality objectives). The proposed Project site is located within the Santa Ana Watershed and San Jacinto Sub-Watershed. Runoff from the PVCCSP area discharges into the Perris Valley Strom Drain, which is tributary to the San Jacinto River, Canyon Lake, and Lake Elsinore. Canyon Lake is currently listed as an impaired waterbody on the Clean Water Act Section 303(d) List because it exceeds water quality objectives for nutrients and pathogens. Lake Elsinore is listed as an impaired water body due to nutrients, organic enrichment/low dissolved oxygen, polychlorinated biphenols (PCBs), sediment toxicity, and unknown toxicity.

Activities associated with the implementation of the proposed Project includes demolition of existing structures and construction of the proposed Project would include use of heavy equipment, which may have the potential to release pollutants (e.g., oil from construction equipment, cleaning solvents, paint) and silt off-site which could impact water quality. However, the Project developer is required to prepare a SWPPP pursuant to the statewide Construction General Permit (NPDES General Permit No. CAS000002, Waste Discharge Requirements, Order No. 2009-0009-DWQ, adopted September 2, 2009 and effective as of July 2, 2010) issued by the State Water Resources Control Board (SWRCB) for construction projects that will reduce any potential construction-related water quality impacts to a less than significant level.

The Project site and off-site improvement areas are mostly developed and contain impervious land cover types. Implementation of the proposed Project would add impervious surfaces to the undeveloped portions of the Project site and off-site improvement area through the construction of the warehouse building and associated parking, loading areas, drive aisles, and paving portions of Sinclair Street. By increasing the percentage of impervious surfaces on the Project site and off-site improvement area, less water would percolate into the ground and more surface runoff would be generated. The new paved areas would collect dust, soil and other impurities that would be assimilated into surface runoff during rainfall events. Operation of the Project has the potential to release pollutants resulting from replacing vacant land with a building and parking lots. These improvements may potentially impact water quality. However, according to the *Project-Specific Water Quality Management Plan* (WQMP), dated September 16, 2022, prepared by FMCivil Engineers Inc. and included as Appendix H of this Initial Study, the Project site minimized impacts by maximizing impervious area given the proposed site usage, required materials, and the landscaping pervious cover. (FMC-B, p. 9.) Once constructed, the proposed Project site would include approximately 88,689 square feet of landscaping, which constitutes approximately 10.1 percent of the Project site which meets the City's 10 percent landscaping requirement.

According to the *Preliminary Drainage Study*, dated September 19, 2022, prepared by FMCivil Engineers Inc, and included as Appendix G of this Initial Study, the proposed Project site has been designed so that all storm water flows generated at the Project site would be collected by means of a combination of an on-site storm drain system (pipes) and two above ground biofiltration basins. Flows collected by the storm drain system would be directed to an underground bioretention chamber system located under the truck trailer parking lot area for water quality mitigation. A continuous deflection separation unit would be installed upstream of the underground bioretention chambers for pretreatment and to help by-pass larger storm events that would be directed to a separate underground detention chamber system. This system would be sized to help mitigate the increase storm water runoff for the 100-year event to levels that are "at or below" the current conditions; and that the runoff does not exceed the design flow rate of the existing outlet pipe. Due to the physical constraints and the depth of the underground chambers, the Project would require the use of a storm water lift station to drain the underground detention chambers. The lift station would pump flows to a 6-inch force drain line that would extend and connect to an onsite manhole and a 24-inch diameter gravity storm drain line that connects to the existing 30-inch by 19-inch outlet arch reinforced concrete pipe located on the middle portion of the Project site's easterly boundary which then conveys the flows to a 28"x18" corrugated metal pipe arch that crosses under Perris Boulevard. Storm flows continue easterly and would be discharged to the MDP Lateral G-2. (FMC-A, pp. 7, 9-11).

The underground detention chamber system would be sized to mitigate the increase storm water runoff for the 100-year event for the 1, 3, 6 and 24-hour storm duration to levels that are "at or below" the current conditions; and that it does not exceed the design flow rate of the existing outlet arch pipe. The lift station would be sized such that the underground detention chambers are drained within 48-hours but no more than 72-hours and that the flow rate would be at or below the current conditions and would be below the maximum allowable flow rate.

Because the Project site is exempt from Hydrologic Conditions of Concern, the proposed land use flow rates are not required to match existing land use flowrates. (FMC-B, p. 23.) Pursuant to PVCCSP EIR mitigation measure **MM Haz 5**, all retention and water quality basins would be designed to drawdown within 48 hours of a rainfall event. The Preliminary WQMP has been submitted to the City Public Works Department for review. Prior to issuance of a grading or building permit, a final WQMP would be required for the Project.

The proposed Project would also implement permanent structural and operation source control BMPs. Structural source control BMPs would include but are not limited to the following:

- marking all inlets with the words "Only Rain Down the Storm Drain;"
- designing landscape to minimize irrigation and runoff, promote surface infiltration, and minimize the use of fertilizers and pesticides;
- specify plants that are tolerant of saturated soil conditions;
- use pest-resistant plants, especially adjacent to hardscape;
- captured paving trash container storage areas with an impervious surface;
- utilizing covered and leak proof trash dumpsters with attached covers or lids;

- placing trash enclosures under a roof;
- placing trash compactors under a roof and on a concrete pad;
- placing signage on or near trash dumpsters with the words “Do not dump hazardous materials here;”
- if industrial processes are to be located on site, state: “All process activities to be performed indoors. No processes to drain to exterior or to storm drain system;”
- providing a means to drain fire sprinklers; and
- avoiding roofing, gutters and trim made of copper or other unprotected metal that may leach into runoff.

Operational control BMPs would include but are not limited to:

- maintaining or replacing inlet markings;
- providing stormwater pollution prevention information to site operators, lessees, or operations;
- removal of trash, debris, and sediment and repairing any damage that may impact water quality;
- inspecting and maintaining drains to prevent blockages and overflow; maintaining landscaping using minimum or no pesticides;
- moving loaded and unloaded items from the loading docks indoors as soon as possible;
- maintaining loading dock areas in a clean and orderly condition by sweeping instead of using wash-down water and litter removal; and
- regular sweeping of parking lots to precent accumulation of litter and debris. (FMC-B; Appendix 8.)

The proposed Project incorporates site design, source control and treatment control BMPs to address storm water runoff. The proposed onsite bioretention basin and bioretention chamber systems would treat storm water runoff before it leaves the site. Bioretention has a “high” removal efficiency for sediment, trash, metals, bacteria, oil/grease, organic compounds, and pesticides. Thus, through Project design features (i.e., the bioretention basin and chamber system) and BMPs combined with compliance with existing regulations, the proposed Project would not violate water quality standards, waste discharge requirements, or otherwise degrade surface or ground water quality. Therefore, impacts would be less than significant and no mitigation is required.

10b. **Less than significant impact.** The proposed Project site overlies the bounds of the San Jacinto Groundwater Basin 8-005 and the Perris North Groundwater Management Zone. The Project site does not contain groundwater recharge facilities or groundwater production wells.

Prior to the Sustainability Groundwater Management Act, the Eastern Municipal Water District (EMWD) managed groundwater resources in the San Jacinto Groundwater Basin by implementing the *West San Jacinto Groundwater Management Plan*. Pursuant to the Sustainability Groundwater Management Act, a Groundwater Sustainability Plan for the West San Jacinto area has been drafted and is currently under review by the California Department of Water Resources. The purpose of the Groundwater Sustainability Plan is to define the conditions under which the groundwater resources of the West San Jacinto Groundwater Sustainability Plan Area, which support agricultural, domestic, municipal and industrial, and environmental uses, will be managed sustainably in the future.

The proposed Project would result in a slight increase in the amount of impervious surfaces since the site is mostly developed. Pursuant to the Perris Municipal Code, the minimum landscaping pervious cover of ten percent was achieved. Due to the proposed Project's small size in relationship to the total size of the groundwater basin and implementation of BMPs as described in *Section 10a* above, there would not be a substantial effect upon sustainable groundwater management of the basin. Further, the Project is a part of the PVCCSP, for which the EMWD prepared a Water Supply Assessment pursuant to SB 610. The Water Supply Assessment determined that the EMWD has sufficient water supplies to meet the future demand from buildout of the PVCCSP and that the Project site's land use type has been accounted for in the water supply and water demand projections in the EMWD's Urban Water Management Plan (UWMP) (see further discussion in Section 5.19 Utilities and Service Systems).

The Project site does not currently provide recharge facilities nor is it identified as a future recharge site. The water suppliers' demand projections accounted for the Project's future water demand. Management of the San Jacinto Groundwater Basin has been actively ongoing since 1995 and will continue with a groundwater sustainability plan beginning in 2022 through 2042. Therefore, Project implementation would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant and no mitigation is required.

10c (i). Less than significant impact. There are no streams or rivers within the Project site as the Project site is currently developed and the Project site is not impacted by any off-site flows. The Project site is relatively flat and generally drains towards the east via surface improvements. (FMC-B, p. 6.) Redevelopment of the proposed Project site would maintain the existing drainage pattern by conveying runoff utilizing a combination of inlets and a subsurface storm drain system to convey flow into proposed above ground retention basins, underground retention chambers, and underground detention chambers. The underground bioretention chambers would treat on-site flows collected by the proposed storm drain system. The aboveground biofiltration system would treat surface flows and any excess flows would be directed to an underground detention chamber to be treated by a Contech continuous deflection hydrodynamic separator and then conveyed via a lift station to the existing arch reinforced concrete pipe located on the middle portion of the Project site's easterly boundary. Then flows would be conveyed via the existing arch reinforced concrete pipe located in the middle of the Project site's eastern boundary, to the corrugated metal pipe arch, that crosses under Perris Boulevard, and into MDP Lateral G-2. (FMC-A, pp. 9-11.) MDP Lateral G-2 will discharge to the Perris Valley Strom Drain regional flood control facility.

The Project would not be subject to off-site run-on as nearby development would contain their respective on-site flows. The vacant land to the north and to the east is an industrial project development that is in progress. That project would also be required to contain its respective on-site flows. In addition, Sinclair Street and Perris Boulevard are already constructed to the ultimate widths and safely convey road runoff via existing curbs and gutters.

Therefore, the proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site. Thus, impacts would be less than significant.

10c (ii). **Less than significant impact.** On-site flows generated by the proposed Project would be collected by a combination of inlets and a subsurface storm drain system to convey flow into proposed above ground retention basins, underground retention chambers, and underground detention chambers. The underground bioretention chambers would treat on-site flows collected by the proposed storm drain system. The aboveground biofiltration system would treat surface flows and any excess flows would be directed to an underground detention chamber to be treated by a Contech continuous deflective hydrodynamic separator and then conveyed via a lift station to the existing arch reinforced concrete pipe located on the middle portion of the Project site's easterly boundary. Then flows would be conveyed via the existing arch reinforced concrete pipe located in the middle portion of the Project site's eastern boundary, to the corrugated metal pipe arch, that cross under Perris Boulevard, and into MDP Lateral G-2. (FMC-A, pp. 9-11.) MDP Lateral G-2 will discharge to the Perris Valley Strom Drain, regional flood control facility. The RWQCB has deemed this area exempt from hydrologic conditions of concern; therefore, additional holding capacity in the basin is not required. (FMC-B, p. 23.) The proposed Project's drainage improvements would adequately convey flows to the retention and detention chambers and provide flood protection for the 100-year storm event. (FMC-A, pp. 9-10.) In addition, the proposed water quality basin would adequately treat on-site flows. (FMC-A, pp. 9-10.) Further, as noted in *Section 10c*(i) above, Sinclair Street and Perris Boulevard are already constructed to their ultimate widths and safely convey road runoff. Therefore, the proposed redevelopment of the Project-site would not impact flooding conditions to upstream or downstream properties. Thus, the proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in on-site or offsite flooding. Impacts would be less than significant.

10c (iii). **Less than significant impact.** As described in *Section 10c(i)* above, on-site flows generated by the proposed Project would be collected and conveyed using a combination of surface flows, gutters, inlets and subsurface storm drains to convey flows to the proposed on-site above ground retention basins, underground retention and detention chambers. The total discharge flows would flow directly to the Perris Valley Strom Drain. The Perris Valley Strom Drain is an earthen flood control channel and an MDP facility designed to accommodate flows from the Perris Valley watershed in a 100-year storm event after development of the watershed, including development within the PVCCSP.

The proposed Project's on-site subsurface storm drain systems would adequately convey flows to the above ground retention basins, underground retention and detention chambers and provide flood protection for the 100-year storm event which would be at or below current

conditions storm duration levels. (FM-A, p. 10.) The Project's runoff would convey into the existing pipes then to proposed Line AC-2 to the MDP Lateral G-2, and discharge directly to the Perris Valley Strom Drain which drains into the San Jacinto River before finally reaching the Lake Elsinore Basin. Therefore, the proposed Project would not impact flooding condition to upstream or downstream properties. As such, impacts related to the Project's runoff would be less than significant and no mitigation is required.

10c (iv). Less than significant impact. As shown on Federal Emergency Management Agency (FEMA) Panel No.06065C1430H, the majority of the proposed Project site is located within unshaded Zone X. Unshaded Zone X are areas outside of the 0.2 percent annual chance floodplain. This means the Project site and offsite improvement area are not located in an area with existing flood flows. Therefore, implementation of the proposed Project would not impede or redirect flood flows and impacts would be less than significant and no mitigation is required.

10d. Less than significant impact. As described in *Section 10c(iv*), above, the Project site and off-site improvement area are not located in a flood hazard zone and therefore would not risk release of pollutants as a result of Project inundation due to a flood.

A tsunami is a very large ocean wave caused by an underwater earthquake or volcanic eruption. The Project area is located approximately 40 miles east of the Pacific Ocean and, as such, a tsunami would not affect the Project area. No impacts related to inundation due to a tsunami would occur.

A seiche occurs when a wave oscillates in lakes, bays, gulfs, or other enclosed bodies of water including water tanks due to seismic disturbances. The Project area is located approximately 2.4 miles west of the Lake Perris Reservoir and, as such, a seiche from this water body would not impact the Project area. No other large waterbodies are located near the Project site or off-site improvement area that could have a seiche. No impacts related to inundation due to a seiche would occur.

Regarding the Lake Perris Dam, according to Perris General Plan Safety Element Figure S-4, the proposed Project site and off-site improvement area are within the Dam Inundation Area for the Lake Perris Dam. Projected water flows from failure of the Lake Perris Dam are based on a scenario in which a full reservoir completely empties and does not account for run-off from other sources. (GPEIR, p 26.) The Department of Water Resources identified potential seismic safety risks in a section of the foundation of the Perris Dam. In April 2018, the Department of Water Resources completed a major retrofit to Perris Dam in Riverside County as part of a statewide effort to reduce seismic risks to dams. Upgrades to the 130-foot-tall, earthen dam included strengthening roughly 800,000 cubic yards of foundation material by mixing cement with soil and reinforcing it with a 1.4 million-cubic-yard earthen stability berm placed on the downstream side of the dam. The dam upgrades were designed to withstand a magnitude 7.5 earthquake. (DWR 2021.) For these reasons, impacts related to the release of pollutants due to inundation of the Lake Perris Dam would be less than significant and no mitigation is required.

10e. Less than significant impact. Substantial regulation currently exists that addresses stormwater runoff and keeping non-stormwater pollutants out of receiving waters, including the statewide construction general permit (CGP) (i.e. SWPPP) and the Municipal Separate Storm Water Sewer System (MS4) Permit (i.e. WQMP). The Project would be conditioned to comply with these regulations as described in *Section 10a* above. Through compliance with said regulations, the

Project would be consistent with the Santa Ana RWQCB Water Quality Control Plan. Because the Project is a planned component of an approved Specific Plan, underlain by soils with poor infiltration, and it would be accounted for in the forthcoming Groundwater Sustainability Plan, the Project would not conflict with or obstruct a sustainable groundwater management plan. Thus, in regard to conflicting or obstructing a water quality control plan, or sustainable groundwater management plan, impacts would be less than significant.

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

References: ALUC, GP, PVCCSP

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

11a. **No impact.** Portions of the Project site and the off-site improvement area are already developed with existing industrial buildings, associated parking lots, and paved roads. The area surrounding the Project site and the off-site improvement area is currently dominated by industrial uses and vacant land approved for industrial uses. The planned land uses in the vicinity of the proposed Project site have PVCCSP land use designations of Light Industrial. Rather than dividing a community, the PVCCSP intends to bring the area together as a unified neighborhood for higher quality business development including industrial, commercial, and office uses. (PVCCSP, pp. 1.0-1–1.0-2.) The off-site improvement area includes paving the southern Sinclair Street lane consistent with the City's General Plan. Therefore, the proposed Project would be consistent with the surrounding land uses and no impact would occur with regard to physically dividing an established community. No mitigation is required.

11b. **Less than significant with mitigation.** The proposed Project site is located within the PVCCSP planning area of the City of Perris. Thus, land use is guided by both the Perris General Plan and the PVCCSP. The proposed Project includes a warehouse/distribution facility, which is consistent with the PVCCSP Light Industrial (LI) land use designation and paving of the southern Sinclair Street lane consistent with the City's General Plan. As evaluated in **Table K – General Plan Consistency**, (commencing on the following page) the proposed Project would also be consistent with all applicable policies from the Perris General Plan that were adopted to avoid or mitigate environmental effects of new development projects.

Since the proposed Project's planned use would be consistent with the Perris General Plan, the proposed Project would also be consistent with Connect SoCal 2020 as discussed in *Section 3a* above. The proposed Project site also lies within Zone B1 APZ II of the MARB/IPA ALUCP. As discussed in *Section 8e* above, the proposed Project would be consistent with the 2014 MARB/IPA ALUCP.

Table K – General Plan Consistency

Policy No.	Policy	Statement of Consistency
Circulation Element		
Policy I.B:	*Support development of a variety of transportation options for major employment and activity centers including direct access to commuter facilities, primary arterial highways, bikeways, park-and-ride facilities, and pedestrian facilities.*	Bike racks would be installed at the Project site to encourage employees to bike to work. As part of the project, the unpaved southern right-of-way portions of Sinclair Street, from Perris Boulevard to Johnson Avenue, would be improved per the PVCCSP. The Project applicant would also pay applicable development impact fees (DIF), which may be used by the City to support development of transportation options. Therefore, the Project would be **consistent** with Circulation Element Policy I.B.
Policy II.B:	*Maintain the existing transportation network while providing for future expansion and improvement based on travel demand, and the development of alternative travel modes.*	The proposed Project would not significantly impact the existing transportation network. The Project applicant would be responsible for the construction of the southern unpaved right-of-way of Sinclair Street from Perris Boulevard to Johnson Avenue. Further, installation of bike racks at the Project site would support development of alternative travel modes and the Project would be **consistent** with Circulation Element Policy II.B.
Policy III.A:	*Implement a transportation system that accommodates and is integrated with new and existing development and is consistent with financing capabilities.*	The proposed Project would be consistent with the land use designations in the Perris General Plan and PVCCSP. Traffic associated with redevelopment of the site as a warehouse can be accommodated by the City's planned transportation system. (WEBB-C.) Additionally, The Project applicant would also pay the applicable developer impact fee (DIF), which may be used by the City to support development of transportation options. Therefore, the Project would be **consistent** with Circulation Element Policy III.A.

Policy No.	Policy	Statement of Consistency
Policy V.A:	*Provide for safe movement of goods along the street and highway system.*	The proposed Project has been designed to ensure that adequate sight distance is provided at the Project's access point and that adequate signing and striping is provided. All Project trucks would be restricted to access City-designated truck routes to access I-215. Because the Project's design would be consistent with the surrounding land use and zoning designations, and redevelopment of the Project site would not introduce incompatible uses to the Project area, the proposed Project would be **consistent** with Circulation Element Policy V.A.
Policy VII.A	*Implement the Transportation System in a manner consistent with Federal, State, and local environmental quality standards and regulations.*	Implementation of the City's Transportation System and consistency of this System with Federal, State, and local environmental quality standards and regulations is the responsibility of the City. The proposed warehouse/distribution facility would be consistent with the Perris General Plan and PVCCSP land use designations of the Project site. Perris Boulevard has been improved to its full width. Light signal modifications improvements include pedestrian call buttons, pedestrian crosswalk stripping, and pedestrian access ramps at Perris Boulevard, south of Sinclair Street. The proposed improvements to Sinclair Street, east of Perris Boulevard, would consist of pavement widening that includes the grind and overlay of existing pavement to join proposed new pavement, in accordance with City standards. As roadways in the Project vicinity have been planned to accommodate Project-generated traffic and comply with all applicable Federal, State, and local standards, the Project would be **consistent** with Circulation Element Policy VII.A.

Policy No.	Policy	Statement of Consistency
Noise Element		
Policy I.A	*The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development.*	The State of California Noise/Land Use Compatibility Criteria was utilized in analyzing potential noise impacts, as discussed in the Section 5.13 – Noise. Therefore, the Project would be **consistent** with Noise Element Policy I.A.
Policy II.A	*Appropriate measures shall be taken in the design phase of future roadway widening projects to minimize impacts on existing noise-sensitive receptors.*	Based on the Noise and Vibration Study (Appendix I) discussed in Section 5.13, two sensitive receptors are located within the Project vicinity. However, neither are along Sinclair Street, which would undergo limited roadway improvements as part of this Project. Project roadway improvements would consist of the grind and overlay of existing pavement to join proposed new pavement, in accordance with City standards. Additionally, traffic signal modifications that include pedestrian call buttons, pedestrian cross walk stripping, and pedestrian access ramps are proposed for pedestrian crossing and connectivity at Perris Boulevard, south of Sinclair Street. These improvements are consistent with existing roadway designations. As indicated in Section 5.13, the Project would have to abide by the PVCCSP EIR mitigation measures **MM Noise 1** through **MM Noise 4**. Compliance with the mitigation measures mentioned above would minimize impacts to existing noise-sensitive receptors. Therefore, the Project would be **consistent** with Noise Element Policy II.A.

Policy No.	Policy	Statement of Consistency
Policy V.A	*New large scale commercial or industrial facilities located within 160 feet of sensitive land uses shall mitigate noise impacts to attain an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria*	The nearest sensitive receptors to the Project site are residential uses located approximately 1,650 feet southeast and approximately 1,850 feet northeast of the Project site. (Entech, p. 28.) The *Noise and Vibration Study* evaluated noise impacts to nearby sensitive receivers in proximity to the Project site. Project generated operational noise at the nearest sensitive receptor is not predicted to exceed 35 dBA CNEL (ENTECH, p. 28), which is below the 60 dBA CNEL noise standard for sensitive receptors. For these reasons, the Project would be **consistent** with Noise Element Policy V.A.
Conservation Element		
Policy II.A:	*Comply with state and federal regulations to ensure protection and preservation of significant biological resources.*	The proposed Project would be consistent with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and would pay applicable fees pursuant to City Ordinance No. 1123 to offset incremental impacts to biological resources from Project construction and operation. Appropriate mitigation measures have been identified in Section 5.4 Biological Resources of this Initial Study to ensure compliance with the MBTA and relevant sections of the California Fish and Game Code. Therefore, the Project would be **consistent** with Conservation Element Policy II.A.
Policy III.A:	*Review all public and private development and construction projects and any other land use plans or activities within the MSHCP area, in accordance with the conservation criteria procedures and mitigation requirements set forth in the MSHCP.*	Consistency and compliance with the MSHCP is discussed in detail in *Section 4f* of this Initial Study. The Project site is not located in a Criteria Cell and is consistent with the other policies set forth by the MSHCP as outlined *under* Section 5.4f. *Therefore*, the proposed Project would be **consistent** with Conservation Element Policy III.A.

Policy No.	Policy	Statement of Consistency
Policy IV.A:	*Comply with State and Federal regulations and ensure preservation of the significant historical, archaeological, and paleontological resources.*	In compliance with the PVCCSP EIR mitigation measure **MM Cultural 1**, a Phase I Cultural Resources Study and a Paleontological Assessment were prepared for the proposed Project to address potential impacts to historic, archaeological, and paleontological resources. As discussed in *Sections 5a, 5b*, and 7f*,* there are no known historic, archaeological, or paleontological resources that would be impacted by Project implementation. Nonetheless, mitigation measures identified in *Sections 5b and 7f* would be implemented to address unknown archaeological and paleontological resources that might be encountered during Project development. Because the Project applicant would adhere to the mitigation measures and to mandatory regulatory requirements, the Project would be **consistent** with Conservation Element Policy IV.A.
Policy V.A:	*Coordinate land-planning efforts with local water purveyors.*	Land planning efforts are the responsibility of the City's Planning Department, not the responsibility of the Project applicant. Nonetheless, as discussed in *Section 19b*, the water provider for the Project Site, the EMWD, prepared and approved a Water Supply Assessment for the PVCCSP in July 2011. Since the proposed Project is consistent with the existing land use designation, then the water usage that would be attributed to development of the Project site would have been accounted for in the Water Supply Assessment. Therefore, the Project would be **consistent** with Conservation Element Policy V.A.

Policy No.	Policy	Statement of Consistency
Policy VI.A:	*Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).*	As discussed in *Sections 7b and 10a* of this Initial Study, the Project developer is required to prepare a SWPPP pursuant to the statewide General Construction Permit (NPDES General Permit No. CAS000002, Waste Discharge Requirements, Order No. 2009-0009-DWQ, adopted September 2, 2009 and effective as of July 2, 2010) issued by the State Water Resources Control Board (SWRCB) for construction projects that would reduce any potential construction-related water quality impacts to a less than significant level. Therefore, the Project would be **consistent** with Conservation Element Policy VI.A.
Policy VIII.A	*Preserve significant hillsides and rock outcroppings in the planning areas.*	The proposed Project site is void of any hillsides or rock outcroppings. The Project would not conflict with Conservation Element Policy VII.A.
Healthy Community Element		
Policy HC 1.3	*Improve safety and the perception of safety by requiring adequate lighting, street visibility, and defensible space*	The proposed Project would include adequate lighting, including security lighting along the building and wall and pole-mounted lights in the parking areas, which would be visible from the street. Additionally, the proposed Project would include the required emergency access point and would be reviewed by the Perris Fire Department to ensure all regulations of the California Fire Code are met. Therefore, the Project would be **consistent** with Healthy Community Element Policy HC 1.3.

Policy No.	Policy	Statement of Consistency
Policy HC 2.3	*Promote increased physical activity, reduced driving and increased walking, cycling and public transit by:* • *Requiring where appropriate the development of compact development patterns that are pedestrian and bicycle friendly* • *Increasing opportunities for active transportation (walking and biking) and transit use* • *Encouraging the development of neighborhood grocery stores that provide fresh produce*	The proposed Project includes off-site roadway improvements to Sinclair Street between Perris Boulevard and Johnson Avenue. These improvements include sidewalks that would connect to the existing sidewalks along Sinclair Street east of the Project site. The Project also includes traffic signal modifications including pedestrian call buttons, pedestrian cross walk stripping, and pedestrian access ramps that would provide pedestrian connectivity at Perris Boulevard, south of Sinclair Street, to the existing residential neighborhood south of Rider Street. The Project Site Plan design includes bicycle parking near the proposed office area on the east side of the building (refer to **Figure 7 – Proposed Site Plan**) to encourage employees to bike to work. Moreover, the Project site is located approximately 0.11 mile south of two existing RTA bus routes. The Project site is zoned for Light Industrial uses and grocery stores are not permitted in this zone. Instead, neighborhood grocery stores should be provided in Commercial zones near existing and planned residential neighborhoods. Therefore, the Project would be **consistent** with Healthy Community Element Policy HC 2.3.
Policy HC 2.4	*Promote development patterns and policies that:* • *Reduce commute times* • *Encourage the improvement of vacant properties and the reinvestment in neighborhoods* • *Provide public space for people to congregate and interact socially* • *Foster safe and attractive environments* • *Encourage civic participation*	The proposed Project would redevelop an existing light industrial use through the demolition of two existing light industrial buildings constructed between 1997 and 2002 and the construction of a new modern building consistent with the PVCCSP Industrial Standards and Development Guidelines, which includes lighting and landscaping requirements. The PVCCSP Design Standards and Guidelines are intended to create eco-friendly, high-quality developments to establish a regional character that identifies the community. Redevelopment of the Project site as proposed constitutes

Policy No.	Policy	Statement of Consistency
		reinvestment in an existing light industrial area through compliance with the PVCCSP standards and the Project would be safe and attractive. The traffic signal modifications and street improvements that would be provided as part of the Project would facilitate pedestrian crossing and connectivity. The local employment opportunities (both short- and long-term) provided by the Project for City residents could reduce commute times for residents who might otherwise have to work outside the City. Additionally, the Project site is located approximately one-tenth of a mile from two existing bus routes, which could help reduce commute times. For these above reasons, the Project would be **consistent** with Healthy Community Element Policy HC 2.4.
Policy HC 2.6	*Encourage land use and urban design to promote physical activity, provide access to nutritious foods, and reduce air pollution.*	The Project is a permitted use in the PVCCSP Light Industrial zone. As required by the PVCCSP Industrial Development Standards and Guidelines, the Project would provide recreational amenities to serve future employees. Specifically, the Project includes a bocce court as shown on **Figure 10 – Landscape Plan.** As an implementing project of the PVCCSP, the Project would implement PVCCSP EIR mitigation measures **MM Air 2** through **MM Air 9**, and **MM Air 11** through **MM Air 15** that would reduce Project emissions. (Refer to Section 5.3 – Air Quality for a complete discussion.) Refer to the discussion in response to Healthy Community Element Policy HC 2.3, regarding the Project's proposed on-site bicycle parking, street improvements and traffic signal modifications that will make the Project area more pedestrian-friendly and the proximity of the Project site to existing public transit. These Project components are designed to promote physical activity for future Project

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		employees by providing an alternative to driving to work, which in turn could reduce Project emissions. As also discussed in the response to Healthy Community Element Policy HC 2.4, the Project site is zoned for Light Industrial uses and grocery stores are not permitted in this zone. Instead, neighborhood grocery stores should be provided in Commercial zones near existing and planned residential neighborhoods. For the reasons set forth above, the Project would be **consistent** with Healthy Community Element Policy HC 2.6.
Policy HC 3.1	*Coordinate with transportation service providers and transportation planning entities to improve access to multi-modal transportation options throughout Perris including public transit.*	As discussed in Section 5.17 – Transportation, pursuant to PVCCSP EIR mitigation measure **MM Trans 4**, coordination with the RTA occurred on April 6, 2023. The RTA determined that no additional bus stops were required along the Project's frontage. Therefore, the Project would be **consistent** with Healthy Community Element Policy HC 3.1.
Policy HC 3.5	*Promote job growth within Perris to reduce the substantial out-of-Perris job commutes that exist today.*	As indicated in the Project Description, based on the PVCCSP EIR employment projection rates, the proposed Project warehouse could generate approximately 418 new long-term employment opportunities to the City residents. Project construction would generate short-term opportunities for construction trades. Therefore, the Project would be **consistent** with Healthy Community Element Policy HC 3.5.
Policy HC 4.1	*Promote public spaces that foster positive human interaction and healthy lifestyles.*	As described in in the Statement of Consistency for Policy HC 2.4 above, the proposed Project includes Traffic signal modifications that would facilitate pedestrian crossing, connectivity and would provide pedestrian linkage from the Project site to the public right-of-way.

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		Recreational amenities, such as a bocce court and a concrete covered lunch patio area with landscape furniture (refer to **Figure 10 – Landscape Plan**) would be provided at the Project site in accordance with the PVCCSP Industrial Development Standards and Guidelines for recreational amenities as part of the Project to serve the future employees. Refer to the discussion in response to Healthy Community Element Policy HC 2.3, regarding the Project's proposed on-site bicycle parking, street improvements and traffic signal modifications that would make the Project area more pedestrian-friendly and the proximity of the Project site to existing public transit. These Project components are designed to promote physical activity for future Project employees by providing alternatives to driving to work, For the reasons set forth above, the Project would be **consistent** with Healthy Community Element Policy HC 2.4.
Policy HC 6.1	*Support regional efforts to improve air quality through energy efficient technology, use of alternative fuels, and land use and transportation planning.*	As discussed in Section 5.3 – Air Quality, the Project would implement PVCCSP EIR mitigation measures **MM Air 2** through **MM Air 9**, **MM Air 11** through **MM Air 15**, **MM Air 19**, and **MM Air 20** that would reduce emissions and support regional efforts to improve air quality reduce energy use. Therefore, the Project would be **consistent** with Healthy Community Element Policy HC 6.1.
Policy HC 6.2	*Support regional water quality efforts that balance water conservation, use of recycled water, and best practices in watershed management.*	As discussed in *Section 5.10a,* the Project would incorporate site design, source control and treatment control BMPs to address storm water runoff. Specifically, the Project would implement a bioretention basin and chamber system to treat storm water runoff before it leaves the Project site. Bioretention has a "high" removal efficiency for sediment, trash, metals, bacteria,

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		oil/grease, organic compounds, and pesticides. Additionally, the Project would implement a City approved Project-specific WQMP. Water quality would be protected during construction through implementation of a City approved SWPPP pursuant to the statewide Construction General Permit issued by the SWRCB. The Project would support regional water conservation efforts through the use of drought tolerant low water usage trees, shrubs, and ground cover in the Project's landscaping plan. Use of mulch in the planted areas, as identified in the landscape plans, will retain moisture and reduce the need for irrigation. For the reasons set both above, the Project would be **consistent** with Healthy Community Element Policy HC 6.2.
Policy HC 6.3.	*Promote measures that will be effective in reducing emissions during construction activities* • *Perris will ensure that construction activities follow existing South Coast Air Quality Management District (SCAQMD) rules and regulations* • *All construction equipment for public and private projects will also comply with California Air Resources Board's vehicle standards. For projects that may exceed daily construction emissions established by the SCAQMD, Best Available Control Measures will be incorporated to reduce construction emissions to below daily emission standards established by the SCAQMD* • *Project proponents will be required to prepare and implement a Construction*	As discussed in Section 5.3, Air Quality, the proposed Project would comply with the existing South Coast AQMD rules and regulations aimed at reducing emissions of pollutants. The Project would not exceed any South Coast AQMD daily emissions thresholds after the implementation of applicable PVCCSP EIR mitigation measures. Therefore, the Project would be **consistent** with Healthy Community Element Policy HC 6.3.

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	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	
Land Use Element		
Policy II.A:	*Require new development to pay its full, fair-share of infrastructure costs.*	The PVCCSP includes an Infrastructure Plan that identifies the utility infrastructure necessary to serve the allowed development in the PVCCSP area. Each individual development proponent, including the Project applicant would pay applicable development impact fees pursuant to City Ordinance No. 1182 to mitigate the cost of public facilities to support new development. Thus, the Project would be **consistent** with Land Use Element Policy II.A.
Policy II.B:	*Require new development to include school facilities or pay school impact fees, where appropriate.*	The Project applicant would pay applicable school facilities fees to the Val Verde Unified School District as required by local and state laws. Thus, the Project would be **consistent** with Land Use Element Policy II.B.
Policy III.A:	*Accommodate diversity in the local economy.*	The proposed Project would be consistent with the PVCCSP land use designation of LI for the site, which was adopted by the City to ensure quality, organized development within the Project site vicinity. As discussed in this Initial Study, the proposed Project would generate short-term jobs during its construction and long-term jobs during its operation. However, because the Project is consistent with the PVCCSP, these are planned employment opportunities. Therefore, the proposed Project would be **consistent** with Land Use Element Policy III.A.

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Policy V.A:	*Restrict development in areas at risk of damage due to disasters.*	The proposed Project site is not located within an area of significant risk due to human or natural disasters. Therefore, although it would be the responsibility of the City to determine whether development restrictions should be in place, the Project would be **consistent** with Land Use Element Policy V.A.
Safety Element		
Policy S-2.1:	*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.*	The Project applicant proposes to widen portions of Sinclair Street, between Perris Boulevard and Johnson Avenue, that includes the grind and overlay of existing pavement to join proposed new pavement, in accordance with City standards. Traffic signal modifications that include pedestrian call buttons, pedestrian cross walk stripping, and pedestrian access ramps are proposed for pedestrian crossing and connectivity at Perris Boulevard, south of Sinclair Street. Therefore, the proposed Project would be **consistent** with Safety Element Policy S-2.1.
Policy S-2.2:	*Require new development or major remodels include backbone infrastructure master plans substantially consistent with the provisions of "Infrastructure Concept Plans" in the Land Use Element.*	The Project site and off-site improvement area are within the PVCCSP, which constitutes the infrastructure master plan for the PVCCSP area. Further, the Project applicant proposes to connect to the existing infrastructure (wet and dry utilities) in Perris Boulevard. As discussed in Section 5.19 Utilities, the proposed Project is not required to construct new infrastructure. Therefore, the proposed Project would be **consistent** with Safety Element Policy S-2.1.
Policy S-2.5:	*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.*	The proposed Project has been designed to accommodate emergency ingress and egress by emergency vehicles. As discussed in Section 5.17 Transportation, the Project would be required to comply with the City's development review process including review by the City Fire

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		Department for compliance with all applicable fire codes which includes site access. Therefore, the proposed Project would be **consistent** with Safety Element Policy S-2.5.
Policy S-4.1:	*Restrict future development in areas of high flood hazard potential until it can be shown that risk is or can be mitigated.*	The Project site is located outside of FEMA's 100-Year Flood Zone (see General Plan Figure S-3 FEMA Flood Hazard Zone). The Project site is located within the 500-year Flood Zone, however as described in Section 5.10 Hydrology and Water Quality, the 500-year Flood zone is a lesser hazard that has a 0.2 percent annual chance of flooding. Moreover, the *Preliminary Drainage Study* prepared for the proposed Project indicated that the drainage improvements would provide flood protection for the 100-year storm event. Therefore, the proposed Project would be **consistent** with Safety Element Policy S-4.1.
Policy S-4.3:	*Require new development projects and major remodels to control stormwater runoff on site.*	The Project applicant is required to control stormwater runoff on-site. As described in Section 5.10 Hydrology and Water Quality, the proposed Project incorporates site design, source control and treatment control BMPs to address storm water runoff generated on-site. Therefore, the Project would be **consistent** with Safety Element Policy S-4.3.
Policy S-4.4:	*Require flood mitigation plans for all proposed projects in the 100-year floodplain (Flood Zone A and Flood Zone AE).*	A flood mitigation plan is not required. The Project site is not located within a high flood hazard area (see Safety Element Figure S-3 FEMA Flood Hazard Zone). The Project site is outside of FEMA's 100-Year Flood Zone. Therefore, the proposed Project would be **consistent** with Safety Element Policy S-4.4.
Policy S-4.5:	*Ensure areas downstream of dams within the City are aware of the hazard potential and educated on the*	This is a City-level policy that requires awareness and education to the community within the inundation area. In a seismic event emergency, the City, in conjunction with California Department of Water

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	necessary steps to prepare and respond to these risks.	Resources, would implement inundation notification protocols consistent with the Emergency Action Plan (EAP). The Project site is within the Perris Dam Inundation Zone (see Safety Element Figure S-4 – Dam Inundation Zones). The Project would not conflict with inundation notification protocols. As discussed above, the proposed Project site is designed to accommodate emergency ingress and egress by emergency vehicles and the Project would not obstruct emergency evacuation. Therefore, the Project would be **consistent** with Safety Element Policy S-4.5.
Policy S-5.3:	*Promote new development and redevelopment in areas of the City outside the VHFHSZ and allow for the transfer of development rights into lower-risk areas, if feasible.*	As discussed in Section 5.20 Wildfire, the Project site is outside of the Very High Fire Hazard Severity Zone (VHFHSZ). Therefore, the Project would be **consistent** with Policy S-5.3.
Policy S-5.6:	*All developments throughout the City Zones are required to provide adequate circulation capacity, including connections to at least two roadways for evacuation.*	The Project site has connections to Sinclair Street and Perris Boulevard. Additionally, the Project site is near Morgan Street to the north, Rider Street to the south, and Redlands to the east. Therefore, the Project would be **consistent** with Safety Element Policy S-5.6.
Policy S-5.10:	*Ensure that existing and new developments have adequate water supplies and conveyance capacity to meet daily demands and firefighting requirements.*	As discussed in Section 5.19 Utilities and Service Systems and Section 5.20 Wildfire, the Project would have adequate water supplies and conveyance capacity to meet daily demands and firefighting requirements. Therefore, the Project would be **consistent** with Safety Element Policy S-5.10.
Policy S-6.1:	*Ensure new development and redevelopments comply with the development requirements of the AICUZ Land Use Compatibility Guidelines and ALUP Airport Influence Area for March Air Reserve Base.*	The Project is the development of a warehouse, an allowable use, within the PVCCSP area of the City. As discussed in Section 5.9 Hazards and Hazards Materials, the Project would be consistent with the requirements of the AICUZ Land Use Compatibility Guidelines and ALUCP Airport Influence Area for March Air Reserve Base.

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		Therefore, the Project would be **consistent** with Safety Element Policy S-6.1.
Policy S-6.2:	*Effectively coordinate with March Air Reserve Base, Perris Valley Airport, and the March Inland Port Airport Authority on development within its influence areas.*	Coordination with these outside agencies is a City responsibility and the Initial Study/MND will be transmitted to MARB and the March Inland Port Airport Authority. As discussed in Section 5.9 Hazards and Hazards Materials, the Project was designed to minimize aircraft hazards and the Project would be consistent with the requirements of the AICUZ Land Use Compatibility Guidelines and ALUCP Airport Influence Area for March Air Reserve Base/Inland Port Airport. Therefore, the Project would be **consistent** with Safety Element Policy S-6.2.
Policy S-6.3:	*Effectively coordinate with March Air Reserve Base and Perris Valley Airport on development within its influence areas.*	Coordination with these outside agencies is a City responsibility and the Initial Study/MND will be transmitted to MARB and the March Inland Port Airport Authority. As discussed in Section 5.9 Hazards and Hazards Materials, the Project was designed to minimize aircraft hazards and the Project is consistent with the requirements of the AICUZ Land Use Compatibility Guidelines and ALUCP Airport Influence Area for March Air Reserve Base/Inland Port Airport. The Project site is not within the Perris Valley Airport Influence area. Therefore, the Project would be **consistent** with Safety Element Policy S-6.3.
Policy S-7.1:	*Require all development to provide adequate protection from damage associated with seismic incidents.*	As discussed in Section 5.7 Geology and Soils, the Project has been designed to meet or exceed the seismic standards in the current California Building Code to reduce seismic impacts. Therefore, the Project would be **consistent** with Safety Element Policy S-7.1.
Policy S-7.2:	*Require geological and geotechnical investigations by State-licensed professionals in areas with potential for seismic and geologic hazards as*	As discussed in Section 5.7 Geology and Soils, a geotechnical investigation (included as Appendix E of this Initial Study), was conducted for the Project by State-licensed

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	part of the environmental and development review and approval process.	professionals. Therefore, the Project would be **consistent** with Safety Element Policy S-7.2.
Environmental Justice Element		
Goal 3.1 Policy:	*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.*	The area surrounding the Project site, the existing use, and proposed use have a PVCCSP land use designation of Light Industrial. The Project area is dominantly comprised of other warehouses or approved warehouse projects. As described in Section 5.13 Noise, impacts to that sensitive use were less than significant since noise emanating from the Project were below the City's noise standards. As such, the Project would be compatible with surrounding uses. Therefore, the Project would be **consistent** with this Environmental Justice Element Goal 3.1 Policy.
Goal 3.1 Policy:	*Support identification, clean-up and remediation of local toxic sites through the development review process.*	As discussed in Section 5.9 Hazards and Hazards Materials, the Project site is not in or adjacent to a toxic site. Therefore, the Project would be **consistent** with this Environmental Justice Element Goal 3.1 Policy.
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, day-care centers, schools, and nursing homes from air pollution, noise lighting, and traffic associated with large warehouses, making them a "good neighbor."*	The closest sensitive receptors to the Project site are residential uses approximately 1,650 feet southeast and approximately 1,850 feet northeast of the Project site, and a church located approximately 1,300 feet southeast from the Project site. As described throughout this Initial Study, the air, noise, lighting, and transportation impacts associated with the construction and operation of the Project would be less then significant. Therefore, the Project would be **consistent** with this Environmental Justice Element Goal 3.1 Policy.

In September 2022, the City adopted its Good Neighbor Guidelines for Siting New and/or Industrial Facilities (Perris Good Neighbor Guidelines). The Perris Good Neighbor Guidelines act as a supplement

to the City's Zoning Code and Specific Plans. The goals and policies in the Perris Good Neighbor Guidelines are intended to balance economic growth, industrial development, and business success, while implementing methods for the reduction of potential negative impacts on sensitive receptors. (Perris GNG, p. 3.) The Perris Good Neighbor Guidelines was approved on September 27, 2022, and is applicable to all new warehouse, logistics, and distribution facilities excluding in process formal entitlement applications that were submitted prior to its effective day. Because the formal entitlement application for the proposed Project was submitted prior to the effective date of the Perris Good Neighbor Guidelines, the Perris Good Neighbor Guidelines does not apply to this Project.

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

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

References: GPEIR, COR GP

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

12a. **No impact.** The City of Perris General Plan EIR notes that lands within City are either designated Mineral Resource Zone Three (MRZ-3) or Mineral Resource Zone Four (MRZ-4), as defined by the California Department of Conservation. (GPEIR, p. VI-28.) The Project site is within MRZ-3. MRZ-3 represents areas where the available geologic information indicates that mineral deposits exist or are likely to exist; however, the significance of the deposit cannot be evaluated from available data. In addition, the California Department of Conservation does not show oil, gas, or geothermal fields underlying the site; and no oil or gas wells are recorded on or near the site in the Division of Oil, Gas, and Geothermal Resources Well Finder. (DOC Well Finder.) Further, due to the existing warehouses, Colorado River Aqueduct, and other developments surrounding the majority of the Project site, it is unlikely that a mining operation could feasibly function if significant resources were discovered in the future. Therefore, because there are no known mineral resources within the Project site, no impact would occur and no mitigation is required.

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

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

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

Airport Overlay Zone (from Chapter 12.0 of the PVCCSP)

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

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

EXPLANATION OF CHECKLIST ANSWERS

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

Existing Ambient Conditions

For this Project, the existing ambient noise environment was collected by conducting one (1) long-term 24-hour field noise measurements taken at location LT-1, within the Project site as shown on Figure 7 – Long Term Measurement Locations of the Noise and Vibration Study. The 24-hour average noise level is 63 A-Weighted Decibels (dBA) CNEL at the LT-1 location as shown in **Table L – Existing (Ambient) 24-hour Noise Level Measurements.** The existing

ambient CNEL noise levels are within the Perris General Plan standards of up to 70 dBA CNEL for industrial land uses; however the existing ambient noise levels are above those accepted levels for residential land uses, which is up to 60 dBA CNEL (ENTECH, Figure 4.)

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

Noise Monitoring Location ID	Address	Hourly Noise Levels (1 hr- L_{eq})				24-Hour CNEL Noise Level
		Daytime[1] Minimum	Daytime[1] Maximum	Nighttime[2] Minimum	Nighttime[2] Maximum	
LT-1	Project site	36.8	62.3	36.7	61.0	63.2

Source: Appendix I, Table 5-1

[1] Daytime hours are 7:01 am to 10:00 pm

[2] Nighttime hours are 10:01 pm to 7:00 am

Construction Noise – Temporary

The closest sensitive receptors to the Project site are residential residences at receiver 1 (R1) approximately 1,650 feet southeast, receiver 7 (R7) approximately 1,850 feet northeast, and receiver 2 (R2), a church, approximately 1,300 feet southeast from the Project site. It was assumed that each construction activity would occur at the edge of the Project site. Sensitive receptors may be affected by short-term noise impacts associated with the transport of workers, the movement of construction materials to and from the project site, demolition. ground clearing, excavation, grading, and building activities. Construction noise is considered a short-term impact and would be considered significant if construction activities are undertaken outside the allowable times as described by the Perris Municipal Code Section 7.34.060 and/or if they cause noise levels to exceed daytime noise standard of 80 dBA L_{max} at residential properties. Should construction activities need to occur outside of the hours permitted by the Perris Municipal Code, the Project applicant would be required to obtain authorization from the City.

Off-road construction equipment is expected to operate on the Project site during the allowed days and permissible hours. The Project applicant indicated that on-site concrete pouring activities could occur at night to allow the concrete to set properly. Concrete pours would typically start at 1:00 a.m. With implementation of PVCCSP EIR mitigation measures **MM Noise 1** through **MM Noise 4**, all construction noise levels at the Project site would be 57 dBA L_{max} or less during daytime and nighttime hours, with the loudest activity construction activity, grading, anticipated to be 57 dBA L_{max} at the nearest sensitive receptor, below the City's 80 dBA L_{max} standard for construction. (ENTECH, p. 34.) Nighttime concrete pouring that could occur during the building construction phases would generate noise levels of 55 dBA L_{max} at the nearest sensitive receptor, below the 80 dBA. L_{max} standard. (ENTECH, p. 34.) Additionally, the Project applicant would obtain authorization from the City for nighttime concrete pourings. Therefore, potential construction-related noise impacts would be less than significant for short term noise from construction activities.

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

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.

Project-Generated Traffic Noise Impacts

Noise contours were used to assess the Project's incremental traffic-related noise impacts at land uses adjacent to roadways conveying Project traffic based on the PVCCSP EIR significance criteria. The noise contours represent the distance to noise levels of a constant value and are measured from the center of the roadway for the 70, 65, 60, and 55 dBA CNEL noise levels.

According to the PVCCSP EIR, a potential noise impact at a sensitive receptor location would occur if implementation of the Project would result in (PVCCSP EIR, p. 4.9-20.):

- an increase of 3 dBA or more from existing noise levels where the 60 dbA noise standard for sensitive receptors is exceeded; and/or
- an increase of 5 dBA or more from existing noise levels at all other sensitive receptor locations..

The expected traffic noise during operations was calculated using a computer program that replicates the Federal Highway Administration Traffic Noise Model FHWA-RD-77-108 to determine if Project generated traffic increase would result in noise impacts that exceed the City's limit. The FHWA Model arrives at a predicted noise level through a series of adjustments to the reference energy mean emission level. The national reference energy mean emission levels are substituted with the California Vehicle Noise (Calveno) Emission Levels in California. Adjustments are then made to the reference energy mean emission level to account for: the roadway classification (e.g., collector, secondary, major, or arterial), the active roadway width (i.e., the distance between the center of the outermost travel lanes on each side of the roadway), the total average daily traffic, the travel speed, the percentages of automobiles, medium trucks, and heavy trucks in the traffic volume, the roadway grade, the angle of view (e.g., whether the roadway view is blocked), the site conditions ("hard" or "soft" relates to the absorption of the ground, pavement, or landscaping), and the percentage of total average daily traffic which flows each hour throughout a 24-hour period. (ENTECH, p. 19.)

Two nearby roadway segments were modeled, Perris Boulevard, between Morgan Street and Rider Street, and Sinclair Street, east of Perris Boulevard, to assess noise impacts for the following scenarios: Existing and Existing plus Project. Noise levels were modeled at the centerline of the subject roadways to calculate Project generated increases in ambient noise levels. The results are presented in **Table M – Peak Hour Traffic Volume Comparison Table**, which summarizes the AM and PM existing and Project peak hour traffic near the Project area.

Table M –Peak Hour Traffic Volume Comparison

Roadway	Segment	dBA CNEL at 60ft (dBA)[a, b, c]			Potential Signifiant Impact
		Existing without Project	Existing with Project	Change in Noise Levels	
Perris Boulevard	Between Morgan Street and Rider Street	64.8	64.8	0.0	No
Sinclair Street	East of Perris Boulevard	47.8	51.2	3.4	No

Source: Appendix I, Table 7-3
Notes:
a Exterior noise levels calculated at 5 feet above ground level.
b Noise levels were calculated from the centerline of the subject roadway.
c Noise levels do not consider the effect of any existing noise barriers or topography that may attenuate ambient noise levels.

As shown above in **Table M**, the existing traffic noise along Perris Boulevard is 64.8 dBA CNEL and the predicted traffic noise for the existing with project scenario is 64.8 dBA CNEL; there is no expected change between existing and existing with project noise levels. The existing traffic noise along Sinclair Street is 47.8 dBA CNEL and the predicted traffic noise for the existing with project scenario is 51.2 dBA CNEL; thus, Project-related traffic is anticipated to increase noise levels along Sinclair Street approximately 3.4 dBA CNEL. Because the projected increase in noise levels is less than 5 dBA and the resultant post-project noise level is less than 60 dBA CNEL, impacts from Project-traffic generated noise is considered less than significant.

Operational Noise

Stationary-related noise impacts associated with rooftop HVAC equipment, on-site parking lot circulation, and the proposed 70-bay loading dock (including back-up beeps) were evaluated using the SoundPLAN noise prediction model's maximum noise levels identified below in **Table N – Reference Noise Levels**.

Table N – Reference Noise Levels

Noise Source	Source Type	No. of Units	Reference Noise Level L_{eq} (dBA)	Reference Noise Level L_{max} (dBA)	Distance (feet)
Idling Semi Truck	Point Source	70	73.8	74.9	10
Back Up Alarm	Point Source	70	77.9	92.7	3
Trailer Parking	Area (SP Parking Tool)	126	-	-	6 trailers / day
HVAC	Point Source	1	67.7	68.6	3
Parking	Area (SP Parking Tool)	108	-	-	3 car/hr

Source: Appendix I, Table 6.2

The reference noise levels for the operational noise sources provided in **Table N** were utilized to calculate the predicted operational source noise levels at sensitive receivers R1 and R7. Receivers R3 through R6 represent noise levels at the property boundary of the Project site and R2 is church. The distance was measured from the receiver location to the Project site

boundary. The worst case predicted operational noise levels for each operational source type were combined to obtain the total Project-only operational noise level at each receiver location and are shown in **Table O – Operational Noise Levels (dBA Lmax and CNEL).**

Table O – Operational Noise Levels (dBA Lmax and CNEL)

Receiver[a]		Distance from Project site (in feet)	Project Noise Level (dBA L_{max})	Daytime Standard 80 dBA L_{max} Exceeded?	Nighttime Standard 60 dBA L_{max} Exceeded?	Project Noise Level (CNEL)	60 CNEL Standard Exceed?
R1	Residential	1,6500	32	No	No	35	No
R2	Church	1,300	34	No	No	37	No
R3	Project site	Project boundary	54	No	No	47	No
R4	Project Site	Project boundary	37	No	No	52	No
R5	Project site	Project boundary	42	No	No	44	No
R6	Project site	Project boundary	60	No	No	56	No
R7	Residential	1,890	27	No	No	31	No

Source: Appendix I, Table 8-1 and 8-2

The highest combined Project operational noise levels for sensitive receptors is 32 dBA L_{max} and 35 dBA CNEL at receiver R1. Operational noise levels associated with the Project are below the Perris Municipal Code exterior noise level standards of 80 dBA L_{max} daytime and 60 dBA L_{max} nighttime and the Perris General Plan Standard of 60 dBA CNEL. (ENTECH, p. 28.) Therefore, construction-related noise impacts would be less than significant.

For the reasons set forth in the preceding paragraphs, impacts regarding the generation of substantial temporary or permanent increase in ambient noise in excess of City standards would be less than significant.

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

Construction Vibration

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

sensitive receiver, R1, is expected to be 60 VdB, which is below the PVCCSP vibration threshold of 80VdB.

Table P – Construction Equipment Vibration Levels (dBA Leq)

Noise Receiver[a]		Distance to Receiver's Property Line	Large Bulldozer Reference Vibration Level[b] at 25 feet	Peak Vibration Level	Exceed 80 VdB Threshold?
R1	Residential	1,650 feet	87 VdB	44 VdB	No

Source: Appendix I, Table 10-4

Notes:

a Receiver location as shown on Figure 6 in Appendix I

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

Based on the reference vibration levels provided by the FTA, a large bulldozer represents the peak source of vibration with a reference level of 87 VdB at a distance of 25 feet. At 1,650 feet, measured from the Project site's boundary to the nearest sensitive receiver, R1, construction vibration levels are expected to approach 44 VdB. Using the construction vibration assessment annoyance criteria provided by the FTA for infrequent events, the construction at the proposed Project site would not result in a perceptible human response (annoyance). (ENTECH, p. 34.) Impacts at the closest sensitive receptor are unlikely to be sustained during the entire construction period. The construction noise level is below the FTA vibration threshold of 78 vdB and 72 VdB for daytime and nighttime periods. (FTA, p. 131). Further, because the predicted construction noise level is below the PVCCSP vibration threshold of 80 VdB, impacts would be less than significant. Nonetheless, as discussed under Section 5.*13a*, the Project would implement PVCCSP mitigation measures **MM Noise 1** through **MM Noise 4**.

Operational Vibration

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

Based on the Caltrans vibration curve (Appendix I, Figure 9), vibration attenuates rapidly with distance. Based on the distance from the roadway centerlines to Receiver R1, the maximum worse-case vibration levels expected at this location is near 0.08 millimeters per second (mm/s) or 0.0032 inches/second or 70 VdB. (ENTECH, p. 31.) Caltrans and the FTA provide a range of perceptible annoyance levels and this predicted vibration level falls well below (i) the distinctly perceptible level of 0.08 peak particle velocity (PPV) inches/second, (ii) the FTA damage criteria of 0.3 PPV inches/second, and (iii) the human annoyance level of 80 VdB. Further this worst-case vibration level from truck traffic would not exceed the Caltrans threshold of 0.2 PPV inches/second. It is expected that actual vibration levels within the project area from truck traffic would be lower than this worst-case level when soil type and pavement conditions are considered. (ENTECH, p. 31.) On this basis, the potential for the Project to result in exposure of persons to, or generation of, excessive ground-borne vibration would be less than significant.

13c. Less than significant impact. According to the MARB/IPA ALUCP and the Final Air Installations Compatible Use Zones (AICUZ) Study for March Air Reserve Base, the proposed

Project site is depicted as being in an area inside the 60 and 65 dBA CNEL aircraft noise contours. (ALUC, Table MA-4; AFRC, Figure 4-2.) Per the Perris General Plan Noise Element, industrial land uses can be exposed to noise levels up to 70 dBA CNEL. Therefore, the proposed Project would not require special measures to mitigate aircraft-generated noise and would not expose people residing or working in the Project area to excessive noise levels. Thus, impacts would be less than significant

The Perris Valley Airport and Skydiving Center is a privately owned and operated airport located approximately 4 miles south of the Project site. Therefore, because the proposed Project is not located in the immediate vicinity of a private air strip or its influence area, no noise impacts are anticipated from operations at this airport.

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

References: SCAG, USCB-A

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

14a. Less than significant impact. According to the US Census Bureau, the City's 2022 population was 80,263. (USCB-A.) The Southern California Association of Governments (SCAG) projections estimate that the City's population and employment are expected to increase to about 121,000 residents and 26,400 employees by the year 2045. (SCAG, p. 39.) The proposed Project does not involve construction of any new homes and would not contribute to a direct increase in the City's population. Any new housing development project, as defined by section 15378 of the State CEQA Guidelines, which is developed within the City of Perris is subject to environmental review and approval. However, the proposed Project may indirectly increase employment within the City by creating jobs both during construction and operation of the proposed Project. The extent to which the new jobs created by a Project are filled by existing residents is a factor that tends to reduce the growth inducing effect of this Project. Furthermore, because the Project would be consistent with the General Plan land use and PVCCSP land use designations, any Project-related growth is planned growth.

Construction

The Project would create short-term jobs that would last approximately 11 months during the construction of the Project. It is unlikely that the construction of the Project would attract substantial number of potential construction employees that would permanently relocate and become a resident of the City. These short-term positions would likely be filled by workers who, for the most part, would already reside in the local area and work through the region. Thus, Project construction would not result in substantial unplanned growth.

Operations

The Project would create long-term jobs. As noted in the Project Description, the proposed warehouse is a is a speculative building and the actual tenant is unknown. Accordingly, the number of employees that could be employed is unknown. However, Table 4.8-E, Development Intensity and Employment Projections, of the PVCCSP EIR, identifies average employment

generation factors for the allowed development types identified in the PVCCSP. Light industrial uses have an average generation rate of one employee per 1,030 square feet and Business Park/Professional Office has a generation rate of one employee per 600 square feet. The Project consists of the construction and operation of up to 427,224-square-foot warehouse including approximately 4,000 square feet of office space use allowed under the Light Industrial Specific Plan land use designation. Based on this generation factor, the Project could conservatively employ approximately 418 new employees.[15] Because the Project is consistent with the General Plan land use and PVCCSP land uses designations, these employees would not constitute substantial unplanned growth.

The Project would involve the installation of utilities necessary to connect to existing infrastructure systems at or in the immediate vicinity of the Project site. These improvements consist of road widening and improvements at existing intersections to improve pedestrian crossing and connectivity consistent with the PVCCSP. (Refer to Section 2.2 Project Description.) The Project would not extend roadways or utilities in a manner that would indirectly induce substantial growth in the immediate vicinity of the Project site or elsewhere. Moreover, the creation of jobs and necessary infrastructure to support the land uses proposed in the PVCCSP were already addressed and analyzed in the previous PVCCSP EIR.

As described above, construction and operation of the proposed Project would not induce substantial unplanned population growth either directly or indirectly. Therefore, impacts would be less than significant and no mitigation is required.

14b. No impact. The Project site is currently developed with a light industrial use and does not contain any structures that provide housing. Therefore, neither demolition of the existing structures or construction and operation of the proposed Project would displace these existing homes or substantial numbers of people necessitating the construction of replacement housing elsewhere. Thus, no impact would occur.

[15] 411 employees (423,224-square-foot industrial warehouse use ÷ 1,030 square feet of floor area per employee) plus 7 employees (4,000-square-foot office use ÷ 600 square feet of floor area per employee) for a total of 418 employees.

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

References: ORD 1182, PVCCSP IS

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

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

4.2.1 Crime Prevention Measures

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

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

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

5.4 Off-Site Infrastructure Standards

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

EXPLANATION OF CHECKLIST ANSWERS

15a. Less Than Significant Impact. The North Perris Fire Station No. 90 is located at 333 Placentia Avenue, approximately 0.94 mile southeast of the proposed Project site. It is expected that this fire station would provide first response to the proposed Project.

Due to the small, planned increase of people at the Project site that would occur from implementation of the Project, an incremental increase in demand for fire protection and emergency medical services would occur. However, this planned increase in employees on-site is limited and would not increase demands such that the existing fire station would not be able to accommodate servicing the Project in addition to its existing commitments, and provision of a new or physically altered fire station would not be required that could cause environmental impacts.

City Ordinance No. 1182 establishes a developer impact fee (DIF) to mitigate the cost of public facilities needed to offset the impact of developing new facilities to support fire services (ORD 1182.) The proposed Project would be required to comply with Ordinance No. 1182 in order to offset potential impacts to the local fire department.

Since the proposed Project does not include any new housing, any impacts would be considered incremental and can be offset through the payment of the appropriate development impact fees. The proposed Project would also be required to comply with all applicable fire code requirements for construction and access to the site and as such, would be reviewed by the City Fire Department to determine the specific fire requirements applicable to ensure compliance with these requirements. Thus, the proposed Project would not result in substantial adverse physical impacts related to fire protection. Therefore, potential impacts would be less than significant.

15b. Less Than Significant Impact. The City contracts with the Riverside County Sheriff's Department to provide police services for the City. The Perris police station is located at 137 North Perris Boulevard, approximately 3.16 miles south of the proposed Project site.

Due to the small, planned increase in on-site people that would occur from implementation of the Project, an incremental increase in demand for police protection could occur. However, the Project would include security lighting and other security measures. In addition, the increase in demand would be limited and would not require provision of a new or physically altered police facility that could cause environmental impacts and impacts would be less than significant.

As stated in *Section 15a,* Ordinance No. 1182 establishes a developer impact fee to mitigate the cost of public facilities to serve new development. The Sheriff's Department receives a portion of these developer impact fees, which are collected and distributed in order to offset the impact of developing new facilities to support sheriff services. The proposed Project would be required to comply with Ordinance No. 1182 in order to offset potential impacts to the local police department. Thus, the proposed Project would not result in substantial adverse physical impacts related to police protection. Therefore, potential impacts would be less than significant.

15c. Less Than Significant Impact. The proposed Project site is located within the boundaries of the Val Verde Unified School District. The proposed Project would not directly create a source of school-aged children as it does not include any housing. Therefore, it would not generate the need for new or physically altered school facilities and impacts would be less than significant.

However, it may indirectly affect schools by providing a source of planned employment that may draw new residents into the area. Appropriate developer impact fees, as required by state law, would be assessed and paid to the school district. Any potential impacts would be considered incremental and would be offset through the payment of the appropriate development impact fees. Thus, the proposed Project would not result in substantial adverse physical impacts related to schools. Therefore, potential impacts would be less than significant.

15d. **Less Than Significant Impact.** The proposed Project would not directly require the construction or expansion of public recreational facilities as it does not include new residential uses. However, it may indirectly affect public recreational facilities by providing a source of planned employment that may draw new residents into the area. The applicable Recreational Facilities DIFs shall be assessed and paid towards parks. With the payment of these fees, the potential impacts to parks and other public recreational facilities would be less than significant.

15e. **Less Than Significant Impact.** The proposed Project would not directly increase the demand for library or other public services because it does not include new residential uses. The City contracts with the Riverside County Public Library System and provides library services at Cesar E. Chavez Library located at 163 E. San Jacinto Boulevard, approximately three and a quarter mile south of the proposed Project site. The proposed Project would be subject to development impact fees that are used to construct new library facilities or expand existing library facilities subsequent to increased demand. Since the proposed Project does not include new housing, any impacts would be considered incremental and can be offset through the payment of the appropriate library mitigation fees. Therefore, potential impacts related to libraries would be less than significant.

The nearest emergency medical service available to the proposed Project area is the Riverside County Regional Medical Facility located at 26520 Cactus Avenue in the City of Moreno Valley, approximately five and a half miles northeast of the Project site. Healthcare facilities are developed in response to perceived market demand by free enterprise. Therefore, the development of the proposed Project would not result in the construction for new or expanded medical facilities. The PVCCSP Initial Study determined that any substantial adverse physical impacts associated with the provisions of new or physically altered medical facilities associated with development within the PVCCSP is considered to be less than significant. (PVCCSP IS, p. 17.) Therefore, impacts would be less than significant.

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

References: PVCCSP EIR, Project Description

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

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

8.2.1.4 Employee Break Areas and Amenities

- An outdoor break area should be provided at each office area location.
- Buildings exceeding 100,000 square feet shall require employee amenities such as, but not limited to, cafeterias, exercise rooms, locker rooms and shower, walking trails, and recreational facilities.
- Site design should consider pedestrian access when adjacent to area wide open space, trails, parks, or other community amenities.

EXPLANATION OF CHECKLIST ANSWERS

16a. **Less than significant impact.** The Project is proposed to operate as a warehouse and would not create a direct increase in the use of public recreational facilities. Although the proposed Project may indirectly affect recreational facilities by creating new planned jobs in the area which may draw new residents to the area, it is anticipated that the majority of jobs would be filled by individuals already residing in the Project vicinity. Indirect impacts to park facilities would be offset through payment of the applicable Recreational Facilities DIFs. With payment of these fees, impacts to parks and other public recreational facilities would be less than significant and no mitigation is required.

16b. **Less than significant impact.** Recreational amenities, such as bocce court and a concrete covered lunch patio area with landscape furniture (refer to **Figure 10 – Landscape Plan**) would be provided at the Project site in accordance with the PVCCSP Industrial Development Standards and Guidelines for recreational amenities as part of the Project to serve the future employees. The physical impacts of building these amenities are addressed through the overall analysis of the site development (in this Initial Study) and no unique or separate environmental

impacts would occur as a result of building and using these facilities. Therefore, potential impacts associated with recreation would be less than significant.

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

References: PVCCSP, PVCCSP EIR, OPR, WEBB-D

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

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

4.2.2.3 Pedestrian Access and On-Site Circulation

- Avoid Conflicts Between Pedestrian and Vehicular Circulation. Provide a system of pedestrian walkways that avoids conflicts with vehicle circulation through the utilization of separated pathways for direct pedestrian access from public rights-of-way and parking areas to building entries and throughout the site with internal pedestrian linkages.
- Primary Walkway. Primary walkways should be 5 feet wide at a minimum and conform to ADA/Title 24 standards for surfacing, slope, and other requirements.
- Pedestrian Linkages to Public Realm. A minimum five-foot wide sidewalk or pathway, at or near the primary drive aisle, should be provided as a connecting pedestrian link from the public street to the building(s), as well as to systems of mass transit, and other on-site building(s).

The following mitigation measures from the PVCCSP EIR would be applicable to the Project:

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

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

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

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

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 would be required to provide alternative feasible improvements to achieve levels of service satisfactory to the City.

EXPLANATION OF CHECKLIST ANSWERS

17a **Less than significant impact.** The Riverside Transit Agency (RTA) operates Route 41 and Route 19 in the Project vicinity (RTA). Pursuant to PVCCSP EIR mitigation measure **MM Trans 4**, the RTA was contacted to determine if future provision of bus routing in the Project area would require bus stops at the Project access points.[16] RTA staff indicated no bus stops are required along the Project site's frontage. The PVCCSP also includes pedestrian paths and sidewalks into roadway design, and bike trails into its *Standards and Design Guidelines* to accommodate non-motorized forms of transportation along roadways within the Specific Plan area and to encourage bus stops to be provided at large commercial and employment centers along existing and future bus routes. Compliance with these policies and the required implementation of PVCCSP EIR mitigation measures **MM Trans 3** and **MM Trans 5** would ensure that the Project

[16] Personal communication with RTA staff on April 6, 2023.

would not conflict with the City's adopted policies, plans, or programs supporting alternative modes of transportation.

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

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

On June 9, 2020, the City of Perris adopted its *Transportation Impact Analysis Guidelines for CEQA* (TIA Guidelines) to help ensure that land use development and transportation projects comply with the latest CEQA requirements regarding VMT. The Perris TIA Guidelines are based on the recommendations provided in the Office of Planning and Research *Technical Advisory on Evaluating Transportation Impacts in CEQA* and the Western Riverside Council of Governments *Draft Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (updated March 2020). The TIA Guidelines provide standardized criteria and established thresholds of significance to be used for analyzing transportation impacts for CEQA. (Perris 2018, p. 1.)

The first step in evaluating a land use project's VMT impact is to perform an initial screening assessment. (Perris 2018, p. 2.) According to the TIA Guidelines, a project is presumed to have a less than significant impact on VMT if the project satisfies at least one of the following VMT screening criteria:

A. Is the project 100% affordable housing?

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

C. Is the project a local serving land use?

D. Is the project in a low VMT area?

E. Are the project's net daily trips less than 500 average daily trips (ADTs)? (Perris 2018, pp. 2-6.)

WEBB prepared a Vehicle Miles Traveled Screening Assessment, dated June 19, 2023, for the proposed Project (included as Appendix J.2 of this Initial Study) based on the City-approved VMT *Scoping Form for Land Use Projects (*Scoping Form*)* dated August 19, 2022. The Vehicle Miles Traveled Screening Assessment was prepared to ascertain if further VMT analysis was required. The Vehicle Miles Traveled Screening Assessment summarized the results of the City-approved VMT Scoping Form and provided additional detail and background for the VMT screening criteria in the Scoping Form. The Vehicle Miles Traveled Screening Assessment indicates that the proposed Project site is screened from further VMT analysis based on the following criteria (WEBB-D):

- The Project would generate less than 500 average daily trips (ADT). Per the Project's trip generation data (WEBB-D, Table 1), the Project is expected to generate 91 net new daily trips which is below the threshold of 500 daily trips. and Criteria E is met.

Thus, the proposed Project satisfies VMT screening Criteria E (projects daily net daily trips less than 500 average daily trips). Therefore, impacts regarding being in conflict or inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant.

17c. **Less than significant impact.** In compliance with PVCCSP EIR mitigation measures **MM Trans 1** and **MM Trans 2**, improvements related to on-site roadway design and safety would be reviewed by City staff and implemented to ensure adequate sight distance be provided at each Project access location. Improvements to Sinclair Street, between Perris Boulevard and Johnson Avenue, would be constructed pursuant to City's standards, Thus, the Project does not entail any design features that would increase traffic hazards due to geometric design.

Additionally, the Project has been designed to reduce the need for pedestrians to cross the truck's path of travel by omitting passenger parking stalls near the truck's path of travel and placing the outside employee amenities adjacent to the warehouse building. Thus, the Project does not entail any design features that would increase traffic hazards due to geometric design. The Project would be reviewed by City staff to ensure that adequate sight distance is provided at each driveway location. Therefore, impacts would be less than significant.

17d. **Less than significant impact.** The proposed Project is required to comply with the City's development review process including review by the City Fire Department for compliance with all applicable fire code requirements for construction and access to the site. As part of the City's standard development review process, the Project would be reviewed by the County Fire Department to determine the specific fire requirements applicable to the Project and to ensure compliance with these requirements. This would ensure that the proposed Project would provide adequate emergency access to and from the site. Thus, implementation of the proposed Project would not result in inadequate emergency access and impacts would be less than significant.

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

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

EXPLANATION OF CHECKLIST ANSWERS

18a(i). Less than significant impact with mitigation. As discussed in *Section 5b* above, there are no items listed or eligible for listing in the California Register of Historical Resources, or a local register of historical resources at the Project site. Nonetheless, in the event that previously undiscovered historical resources are encountered at the Project site during demolition of the existing structure, pavement, and curbs and other ground disturbing activities, implementation of Project mitigation measure **MM CR 1** as described in *Section 5a* above, would ensure that impacts would be less than significant.

18a(ii). Less than significant impact with mitigation. As of July 1, 2015, Assembly Bill (AB) 52, signed into law in 2014, amends CEQA and establishes new requirements for tribal consultation. The

law applies to all projects that have a notice of preparation or notice of negative declaration/mitigated negative declaration. It also broadly defines a new resource category of "tribal cultural resource" and establishes a more robust process for meaningful consultation that includes:

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

The City, as lead agency, is required to coordinate with Native American tribes through the AB 52 Tribal Consultation process. On March 28, 2023, the City provided notification to the following tribes in accordance with AB 52: the Agua Caliente Band of Cahuilla Indians, Morongo Band of Mission Indians, Pechanga Band of Mission Indians, Rincon Band of Luiseño Indians, and Soboba Band of Luiseño Indians. On April 11, 2023, the Rincon Band of Luiseño Indians requested copies of cultural survey report, geotechnical report and grading plans. The City sent the requested documents to the Rincon Band of Luiseño Indians on November 20, 2023. On January 17, 2024, the Agua Caliente requested AB52 consultation. Formal AB52 consultation between the City and the Rincon Band of Luiseño Indians took place January 16, 2024, and between the City and the Agua Caliente Band of Cahuilla Indians on January 18, 2024. As a result of the AB52 consultation, the Project developer would implement mitigation measure **MM CR 1** that requires Native American Monitoring during ground disturbing activities, including grading.

Since none of the remaining tribes (Morongo Band of Mission Indians, Pechanga Band of Mission Indians, and Soboba Band of Luiseño Indians) responded to the AB 52 consultation notification letter and the City has agreed to mitigation requested by the Rincon Band of Luiseño Indians and Agua Caliente Band of Cahuilla Indians, the City considers the consultation period closed. Therefore, implementation of Project-specific mitigation measures **MM CR 1** and **MM CR 2** as described in *Section 5b* and *Section 5c*, above would reduce potential impacts to tribal cultural resources to a less than significant level.

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

References: CAL-C, CAL-D, EMWD UWMP, MWD, PVRWRF 2021, PVCCSP EIR, FMC-A

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

19a. **Less than significant impact.** The proposed Project would utilize the existing electrical power, natural gas, and telecommunications connections that have served the two prior uses. Similarly, the Project would utilize the existing storm drain, potable water, and sewer facilities. The Project would include storm drains, curb and gutter, curb cuts, and u-channels to convey on-site flows to the proposed water quality basin located at the southern portion of the Project site. (FMC-A, pp. 9-11.) (See **Figure 7 – Proposed Site Plan.**) As described in *Section 10*, the Project's storm drain facilities would connect to the existing facilities that have sufficient capacity to serve the needs of the proposed use. The proposed Project would connect to the EMWD's existing 12-inch-diameter potable waterline in Sinclair Street. Sewer service to the Project site would be provided by the EMWD's existing connection located at the southwest corner of the Project site.

The Project would not require new or the relocation of existing utilities. Since utility connections would be constructed within the Project site, any resulting impacts have been addressed in this

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

19b. Less than significant impact. In compliance with Sections 10910–10915 of the *California Water Code* (commonly referred to as "Senate Bill [SB] 610" according to the enacting legislation), a Water Supply Assessment was prepared for the PVCCSP to assess the impact of development allowed by the Specific Plan on existing and projected water supplies. The EMWD approved this Water Supply Assessment in July 2011 and determined that existing and planned EMWD water supplies are sufficient to meet Project-related demands. Since the proposed Project would be consistent with the existing land use designation for the site, then the water usage that would be attributed to development of the Project site would have been accounted for in the Water Supply Assessment. Recently, the EMWD adopted its 2020 UWMP, which contains more accurate projections for water supply and ability to serve the proposed Project area.

Development within the PVCCSP planning area will increase demand for water supplies within the EMWD's service area. According to the PVCCSP Water Supply Assessment, based on the PVCCSP land use designations, at buildout, the PVCCSP is anticipated to have a projected water demand of 2,671.5 acre-feet per year. The Water Supply Assessment prepared for the PVCCSP determined that there would be sufficient water supplies to serve proposed development within the PVCCSP area.

The EMWD adopted its 2020 UWMP, which details the reliability of the EMWD's current and future water supply. The EMWD has four sources of water supply: imported water from the Metropolitan Water District of Southern California (MWD), local groundwater, desalinated groundwater, and recycled water. (EMWD UWMP, p. 3-3.) The EMWD has several planned projects that will increase regional supply reliability by increasing local water supplies and decreasing demands for imported water from the MWD including increasing local groundwater banking through the Enhanced Recharge and Recovery Program (ERRP), expanding the desalter program with the Perris II Desalter, and full utilization of recycled water through implementation of an Integrated Resource Plan. (EMWD UWMP, p. 7-12.) Additionally, the EMWD aggressively promotes the efficient use of water through implementation of local ordinances, conservation programs and an innovative tiered pricing structure. (EMWD UWMP, p. 7-1.)

According to the 2020 UWMP, approximately 50 percent of the EMWD's total retail supply was imported from the MWD (EMWD UWMP, p. 6-2.) The MWD has also prepared a Regional UWMP and Integrated Water Resource Plan to detail their ability to provide water in times of shortage and address concerns regarding water supply reliability based on recent judicial decisions affecting the SWP and potential impacts due to climate change and drought. Based on the information provided in the MWD's 2015 UWMP, the MWD has sufficient supply capabilities to meet the expected demands of its member agencies from 2025 through 2045 under normal, historic single-dry and historic multiple-dry year conditions. (MWD, pp. ES-5 – ES-6.)

The EMWD determined that it will be able to provide adequate water supply to meet the potable water demand for future development allowed by the PVCCSP as part of its existing and future demands. Therefore, it can be concluded that there are sufficient water supplies available to serve the proposed Project, which is consistent with the land use assumptions of the PVCCSP for industrial uses, from the EMWD's existing entitlements and resources as set forth in its 2020 UWMP and the MWD's 2020 UWMP. Therefore, because the proposed Project is consistent

with the land use designation for the site that was assumed in the most recent UWMPs, and with payment of applicable fees, impacts to water supplies would be less than significant.

19c. Less Than Significant Impact. Wastewater collection and treatment service would be provided by the EMWD. Wastewater from the Project would be treated at the Perris Valley Regional Water Reclamation Facility. The Project would connect to the existing 8-inch-diameter sewer pipeline in Sinclair Street.

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

As of 2021, the Perris Valley Regional Water Reclamation Facility accepts approximately 15.5 million gallons per day but has a current treatment capacity of 22 million gallons per day. (PVRWRF 2021.) Thus, the total demand from the PVCCSP represents approximately 59 percent of the current Perris Valley Regional Water Reclamation Facility capacity. A portion of the current wastewater treated at the Perris Valley Regional Water Reclamation Facility consists of diversions from elsewhere in the EMWD's service area. Therefore, because the EMWD's wastewater diversions are operational decisions and because there is sufficient capacity in the EMWD's other wastewater treatment facilities to accommodate additional wastewater flows, overall the EMWD has sufficient capacity to treat the wastewater generated by the PVCCSP developments.

Based on the wastewater generation factor of 1,700 gallons per day per acre for both General Industrial and Light Industrial PVCCSP land use designations applied in the PVCCSP EIR, the Project's proposed development of a warehouse/distribution facility on approximately 20.2 acres would generate approximately 34,340 gallons per day (0.034 million gallons per day) of wastewater that would be treated at the Perris Valley Regional Water Reclamation Facility. As such, the proposed Project's wastewater generation represents less than one percent of the PVCCSP's total estimated wastewater generation (5.3 million gallons per day).

Since the proposed Project consists of construction and operation of a warehouse/distribution facility, it is consistent with the land use designation in the PVCCSP and the wastewater generation analysis assumptions used for the PVCCSP EIR and would not result in impacts greater than those analyzed in the PVCCSP EIR. Therefore, implementation of the proposed Project would have a less than significant impact on the EMWD's ability to treat wastewater and would not contribute significantly to the need for construction or operation of new or expanded wastewater facilities.

19d. Less Than Significant Impact. Trash, recycling, and green waste services within the City are provided by CR&R Waste Services. In addition to normal trash collection, the County of Riverside also sponsors several hazardous waste collection events throughout the year. Waste is transported to the Perris Transfer Station and Materials Recovery Facility located at 1706 Goetz Road, approximately 4.5 miles south of the Project site. At this facility, recyclable materials are separated from solid wastes. Recyclable materials are sold in bulk and transported for processing and transformation for other uses. Solid waste from the proposed Project would be transported to either: (1) the Badlands Landfill on Ironwood Avenue in Moreno Valley, which has

a permitted daily capacity of 5,000 tons per day; or (2) the El Sobrante Landfill on Dawson Canyon Road in Corona, with a permitted daily capacity of 16,054 tons per day. (CAL-C; CAL-D.)

Construction-Related Solid Waste

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

Based on the U.S. Environmental Protection Agency's construction waste and demolition generation factors for nonresidential projects are 4.34 pounds per square foot and 158 pounds per square foot, respectively (EPA, pp. 10,14.) The debris from the existing 206,100-square-foot buildings that would be demolition would be ground-up and reused for the Project site, The proposed Project would generate approximately 927.08 tons of construction-related and demolition-related solid waste.[17]. This represents approximately 0.89 percent of the total estimated construction-related waste to be generated by development of allowed PVCCSP uses, which would be accommodated by the landfills serving the City. Furthermore, the Project would be required to comply with CalGreen Code Section 54.408.1, which requires a minimum of 65 percent of non-hazardous construction and demolition waste to be recycled and/ or salvaged. Therefore, the disposal of construction-related solid waste associated with the proposed Project would not exceed the permitted capacity of the Badlands or El Sobrante landfills and there would be a less than significant impact.

Operational Solid Waste

The PVCCSP EIR estimates that operation of future development under the Specific Plan would generate approximately 544,049 tons per year of solid waste, which would be approximately 7 percent of the combined annual capacity (i.e., yearly intake) of the Badlands and El Sobrante landfills. The PVCCSP EIR concludes that, with development of the PVCCSP, operational solid waste would not substantially contribute to exceeding the permitted capacity of these landfills.

Based on the California Department of Resources, Recycling and Recovery operational solid waste disposal factor of 0.0108 ton per square-foot per year for the Light Industrial PVCCSP land use designation applied in the PVCCSP EIR, the Project's proposed industrial warehouse/manufacturing uses would generate approximately 4,614 tons per year of solid waste requiring landfill disposal.[18] This represents less than one percent of the estimated annual operational solid waste stream for development of allowed PVCCSP uses, which was determined to be accommodated by the landfills serving the City. Therefore, consistent with the findings of the PVCCSP EIR, the disposal of operational solid waste associated with the proposed Project would not exceed the permitted capacity of the Badlands or El Sobrante Landfills and there would be a less than significant impact.

The proposed Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs since the Badlands and El Sobrante

[17] Proposed warehouse 427,224 square feet [427,224 x 4.34 = 1,854,152 pounds or 927.08 tons) plus demolition 206,100 square feet (206,100 x 158 = 32,563,800 pounds or 16,281 tons). Since demo debris will be ground up and reused for the Project site, the net waste would be 927.08 tons.

[18] Proposed warehouse building rounded up to 427,224 square feet. [427,224 x 0.0108 = 4,614.02 tons)

Landfills have the capacity to support the construction and operational waste expected from the Project. Therefore, impacts would be less than significant.

19e. Less Than Significant Impact. Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to decrease solid waste generation through mandatory reductions in solid waste quantities (e.g., through recycling and composting of green waste) and the safe and efficient transport of solid waste. The proposed Project would be required to coordinate with CR&R Waste Services to develop a collection program for recyclables, such as paper, plastics, glass and aluminum, in accordance with local and State programs, including the California Solid Waste Reuse and Recycling Act of 1991. Additionally, the proposed Project would be required to comply with applicable practices enacted by the City under the California Integrated Waste Management Act of 1989 (AB 939) and any other applicable local, State, and federal solid waste management regulations.

The California Integrated Waste Management Act under the Public Resource Code requires that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. In addition, Perris Municipal Code Section 7.44.050 requires that project construction divert a minimum of 50 percent of construction and demolition debris. Also, Section 7.44.060 requires the submittal of a waste management plan. In addition, the 2019 CalGreen Code requires to divert 65 percent of construction waste. Thus, the proposed Project would be required to comply with federal, state, and local statutes and regulations related to solid waste. Therefore, impacts would be less than significant.

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

References: CAL-B, GP, PVCCSP EIR

APPLICABLE PVCCSP STANDARDS AND GUIDELINES, AND MITIGATION MEASURES

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

General Plan Safety Element

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

Weed Abatement (Section 7.08.045).

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

EXPLANATION OF CHECKLIST ANSWERS

20a-d. No impact. The California Department of Forestry and Fire Protection (CAL FIRE) has mapped fire threat potential throughout California. CAL FIRE ranks fire threats based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The

project site is in a Non-Very High Fire Hazard Severity Zone within a local responsibility area. Therefore, the Project would have no impacts related to wildfires or the associated issues identified in *Section a-d*, above.

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

References: Analysis in the preceding checklist.

EXPLANATION OF CHECKLIST ANSWERS

21a. **Less than significant with mitigation.** As discussed in *Sections 5.4a* through *5.4f*, although the proposed Project area is within special status survey areas for the MSHCP, there is no suitable habitat on the Project site to support sensitive biological resources that could potentially be affected by the proposed Project. All potentially significant impacts to biological resources would be avoided or reduced to a less than significant impact with the implementation of Project-specific mitigation measures **MM BR 1** and **MM BR 2** set forth in Section 5.4 Biological Resources of this Initial Study.

As discussed in Section 5.5a, there are no known historic resources at the Project site. As discussed in Section 5.5b, none of the 14 previously recorded cultural resources within a one-mile radius of the Project site were recorded or found within the proposed Project site. Further, the Project site has is largely developed and it is highly unlikely that any cultural resources exist. However, in order to provide protection in the unlikely event that cultural resources are unearthed during Project construction, Project-specific mitigation measures **MM CR 1 and MM CR 2** set forth in Section 5.5 Cultural Resources shall be implemented to reduce potential impacts to a less than significant level.

Thus, the proposed Project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of

the major periods of California history or prehistory. Therefore, impacts would be less than significant with mitigation incorporated.

21b. Less than significant impact with mitigation. The proposed Project is being developed according to the PVCCSP and is an allowed use under the site's Light Industrial land use designations in the PVCCSP; however, implementation of the PVCCSP may result in several cumulatively considerable impacts. Analysis contained in the PVCCSP EIR determined that construction associated within the PVCCSP may have cumulatively significant impacts in the following areas: (PVCCSP EIR, p. 5.0-13.)

- *Air Quality:* Emissions generated by the overall PVCCSP area will exceed the South Coast AQMD'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 EIR.

However, as demonstrated by the analysis in this Initial Study, the proposed Project would not result in any significant environmental impacts. The Project would be consistent with local and regional plans, and the Project's operational air quality emissions would not exceed established thresholds of significance. Additionally, the proposed Project would not cause a substantial increase in ambient noise levels. The Project adheres to all other land use plans and policies with jurisdiction in the Project area and would not cause a significant increase in traffic volumes within the Project area. With the implementation of PVCCSP EIR mitigation measure **MM Air 9**, construction-related air quality impacts would be reduced to a less than significant level. Required implementation of PVCCSP EIR mitigation measures **MM Air 2** through **MM Air 8**, **MM Air 11** through **MM Air 14**, **MM Air 19**, **MM Air 20**, **MM Noise 1** through **MM Noise 4**, **MM Trans 1** through **MM Trans 5**, and **MM Trans 7** would further reduce the less than significant impacts of the Project. Therefore, the proposed Project would not have impacts that are individually limited, but cumulatively considerable, and impacts would be less than significant with mitigation incorporated.

21c. Less than significant impact with mitigation. Effects on human beings were evaluated as part of this analysis of this Initial Study under the aesthetics, air quality, cultural resources as it relates to human remains, geology and soils, GHG, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, tribal cultural resources, and utilities and services systems thresholds. Based on the analysis and conclusions in this Initial Study, impacts for these topics were considered to have no impact, less than significant impact, or less than significant with mitigation incorporated. The following are PVCCSP EIR mitigation measures that would be applicable to the proposed Project: **MM Air 2** through **MM Air 9**, **MM Air 11** through **MM Air 14**, **MM Air 19**, **MM Air 20**, **MM Haz 2** through **Mm Haz 6**, **MM Noise 1** through **MM Noise 4**, **MM Trans 1** through **MM Trans 5**, and **MM Trans 7**. The following are Project-specific mitigation measures that would be incorporated: **MM AES 1**, **MM BR 1, MM BR 2**, **MM CR 1, MM CR 2,** and **MM GEO 1.** Therefore, potential direct and indirect impacts on human beings that result from the proposed Project would be considered less than significant with mitigation incorporated.

SECTION 6.0 REFERENCES

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