



Draft Environmental Impact Report

SCH No. 2019100297

IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project

City of Perris, California



Lead Agency:

City of Perris

135 North "D" Street
Perris, California 92570

Public Review Draft | September 2020

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September 2020

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ACRONYMS, ABBREVIATIONS, AND UNITS OF MEASURE

<u>Acronym</u>	<u>Definition</u>
>	greater than
≥	greater than or equal to
a.m.	Ante Meridiem (between the hours of midnight and noon)
AB	Assembly Bill
AB 52	Native Americans: California Environmental Quality Act
AB 341	Assembly Bill 341
AB 617	Community Air Protection Program
AB 939	California Solid Waste Integrated Management Act
AB 1327	California Solid Waste Reuse and Recycling Act
AB 1493	Pavley Fuel Efficiency Standards
AB 1500	Assembly Bill 1500
AB 2588	Information and Assessment Act of 1987
AB 2595	California Clean Air Act
ACOE	Army Corps of Engineers
A.D.	Anno Domini
ADA	Americans with Disabilities Act
ADOE	Archaeological Determinations of Eligibility
ADP	Area Drainage Plan
ADT	Average Daily Traffic
AFY	Acre Feet per Year
AGR	Agricultural Supply
AIA	Airport Influence Area
AICUZ	Air Installation Compatible Use Zone
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMR	American Medical Response
AMSL	Above Mean Sea Level
AOZ	Airport Overlay Zone
A-P Act	Alquist-Priolo Earthquake Fault Zoning Act
APE	Area of Potential Effect
APS	Alternative Planning Strategy
APN	Assessor Parcel Number
APZ	Accidental Potential Zone
AQIA	Air Quality Impact Analysis
AQMP	Air Quality Management Plan
BAAQMD	Bay Area Air Quality Management District
BACM	Best Available Control Measure

BFSA	Brian F. Smith and Associates
bgs	Below ground surface
bhp	Brake Horsepower
BMPs	Best Management Practices
BTS	Backbone Transmission System
BTU	British Thermal Unit
C ₂ Cl ₄	Benzene
C ₂ F ₆	Hexafluoroethane
C ₂ H ₆	Ethane
C ₂ H ₃ Cl	Vinyl Chloride
CA	California
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod™	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen Code	Title 24 California Green Building Standards Code
CalFire	California Department of Forestry and Fire Protection
CalRecycle	California Department of Resources Recycling and Recovery
CalSTA	California State Transportation Agency
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CAPP	Community Air Protection Program
CAPSSA	Criteria Area Plant Species Survey Area
CARB	California Air Resources Board
CASSA	Criteria Area Species Survey Area
CBC	California Building Code
CBSC	California Building Standards Code
CCR	California Code of Regulations
CCAA	California Clear Air Act
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFCs	Chlorofluorocarbons
CF ₄	Tetrafluoromethane
CFR	Code of Federal Regulations
CFS	Cubic Feet per Second
CGS	California Geologic Survey
CHBI	Caltrans Historic Bridge Inventory
CH ₄	Methane
CHF _s	Fluoroform

CH2FCF	1,1,1,2-tetrafluoroethane
CH3CHF2	1,1-difluoroethane
CH ₂ O	Formaldehyde
CIDH	Cast-in -Drilled-Hole
CIWMB	California Integrated Waste Management Board
CLOMR	Conditional Letter of Map Revision
CMA	Congestion Management Areas
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
CO	Carbon Monoxide
COG	Council of Governments
Corps	United States Army Corps of Engineers
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
CPUC	California Public Utilities Commission
CRA	Colorado River Aqueduct
CRECs	Controlled Recognized Environmental Conditions
CRHR	California Register of Historic Places
Cr(VI)	Hexavalent Chromium
CTC	California Transportation Commission
CTP	Clean Truck Program
CTR	California Toxics Rule
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
CWC	California Water Code
CY	Cubic Yards
DAMP	Drainage Area Management Plan
dB	Decibel
dBA	A-weighted Decibels
DBESP	Determination of Biologically Equivalent or Superior Preservation
DDT	Dichlorodiphenyltrichloroethane
DIF	Development Impact Fee
DMA	Drainage Management Area
DMV	Department of Motor Vehicles
DOC	California Department of Conservation
DOF	California Department of Finance
DOGGR	Division of Oil, Gas, and Geothermal Resources
DOSH	Division of Occupational Safety and Health
DPM	Diesel Particulate Matter
DPR	Development Plan Review
DTSC	Department of Toxic Substances Control

DWR	Department of Water Resources
E	Erosion
EAC	Existing plus Ambient plus Cumulative
e.g.	exempli gratia (for example)
EI	Expansion Index
EIA	Energy Information Administration
EIC	Eastern Information Center
EIR	Environmental Impact Report
EMFAC	Emission Factor Model
EMWD	Eastern Municipal Water District
EO	Executive Order
ESA	Endangered Species Act
EV	Electric Vehicle
FAA	Federal Aviation Administration
FAR	Firm Access Rights
FAR	Floor Area Ratio
FAR	Federal Aviation Regulations
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FGC	Fish and Game Code
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program
FRAP	Fire and Resources Assessment Program
FTA	Federal Transit Association
FWQMP	Final Water Quality Management Plan
G	Grams
Gal	Gallon
GCC	Global Climate Change
Gg	Gigagrams
GHG	Greenhouse Gas
GIS	Geographic Information System
GLA	Glenn Lukos Associates, Inc.
gpd	Gallons per Day
GO-Biz	Governor's Office of Business and Economic Development
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plans
GVWR	Gross Vehicle Weight Rating
GWh	Gigawatt Hours
GWP	Global Warming Potential

HABS	Historic American Buildings Survey
HAER	Historic American Engineering Record
HANS	Habitat Evaluation and Acquisition Negotiation Strategy
HCM	Hazard Management Consulting, Inc.
HCLP	High Volume Low Pressure
HCP	Habitat Conservation Plan
HDPE	High Density Polyethylene
HDT	Heavy-Duty Trucks
HFCs	Hydrofluorocarbons
HHDT	Heavy-Heavy Duty Trucks
HI	Hazard Index
HMTA	Hazardous Materials Transportation Act
HMTAUSA	Hazardous Materials Transportation Uniform Safety Act
HOV	High Occupancy Vehicle
Hp	Horsepower
HPDF	Historic Property Data File
HPLV	High Pressure Low Volume
Hr	Hour
HRA	Health Risk Assessment
HREC	Historical Recognized Environmental Conditions
HSJ	Hemet/San Jacinto
HSWA	Hazardous and Solid Waste Amendments
HWCL	Hazardous Waste Control Law
I-215	Interstate 215
i.e.	that is
IBank	California Infrastructure and Economic Development Bank
IBC	International Building Code
IEPR	Integrated Energy Policy Report
IPCC	Intergovernmental Panel on Climate Change
IPM	Integrated Pest Management
IRP	Installation Restoration Program
ISO	California Independent Service Operator
ISTEA	Intermodal Surface Transportation Efficiency Act
ITE	Institute of Transportation Engineers
JPA	Joint Powers Authority
JPR	Joint Project Review
kg	kilogram
kBTU	kilo-British thermal units
kWh	kilowatt-hour

L	Farmland of Local Importance
LACM	Los Angeles County Museum
LAUSD	Los Angeles School District
lbs	pounds
LCC	Land Capability Classification
LCD	Liquid Crystal Display
LDA	Light duty autos
Ldn	Day-Night Average Noise Level
LDT	Light duty trucks
LE	Land Evaluation
LESA	Land Evaluation and Site Assessment
Leq	Equivalent Continuous Sound Level
LHDT	Light-Heavy Duty Trucks
LID	Low Impact Development
LIP	Local Implementation Plan
L _{max}	Maximum level measured over the time interval
L _{min}	Maximum level measures over the time interval
LOMR	Letter of Map Revision
LOS	Level of Service
LSTs	Localized Significance Thresholds
MARB/IP	March Air Reserve Base/Inland Port
MDT	Medium-Duty Trucks
MDP	Master Drainage Plan
MEISC	maximally exposed individual school child
MEIR	maximally exposed individual receptor
MEIW	maximally exposed individual worker
mg	milligrams
MGD	million gallons per day
MHDT	medium-heavy duty truck
MHMP	Multi-Jurisdictional Hazard Mitigation Plan
MICR	Maximum Individual Cancer Risk
MIP	March Inland Port
MLD	Most Likely Descendent
mm	Millimeters
MM	Mitigation Measure
MMcfd	million cubic feet per day
MMRP	Mitigation Monitoring and Reporting Program
MMTs	million metric tons
MMTCO _{2e}	million metric tons of carbon dioxide equivalent
MND	Mitigated Negative Declaration
MPG	Miles per Gallon
Mph	Miles per hour

MPO	Metropolitan Planning Organization
MRZ-3	Mineral Resource Zone 3
MS4	Municipal Separate Storm Sewer System
MSL	Mean Sea Level
MSHCP	Multiple Species Habitat Conservation Plan
MT	metric ton
MTCO ₂ e	Metric Tons of Carbon Dioxide Equivalent
MUN	Municipal and Domestic Supply
MWD	Metropolitan Water District
MWELO	Model Water Efficient Landscape Ordinance
MWS	Modular Wetlands System
N/A	Not Applicable
NALs	Numeric Action Levels
NAHC	Native American Heritage Commission
NAAQS	National Ambient Air Quality Standards
NCCP	Natural Communities Conservation Plan
NEPSSA	Narrow Endemic Plant Species Survey Area
NF ₃	Nitrogen Trifluoride
NFIP	National Flood Insurance Program
NFPA	National Fire Protection Association
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NIOSH	National Institute for Occupational Safety and Health
NOI	Notice of Intent
NOX	Nitrogen Oxides
N ₂ O	Nitrous Oxide
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NPRBBD	North Perris Road and Bridge Benefit District
NRHP	National Register of Historic Places
O ₃	Ozone
OCP	Organochlorine Pesticides
OCTA	Orange County Transportation Authority
OCWD	Orange County Water District
OEHHA	Office of Environmental Health Hazard Assessment
OHP	Office of Historic Preservation
OHWM	Ordinary High-Water Mark
OPP	Organophosphorus Pesticides
OPR	Office of Planning and Research
ORD	Ordinance
OSHA	Occupational Safety and Health Assessment

Ord.	Ordinance
PAH	Polycyclic Aromatic Hydrocarbons
PC/PS	Pre-Cast/Pre-Stressed
PCBs	Polychlorinated biphenyls
PCEs	Passenger Car Equivalents
PCR	California Public Resources Code
PDF	Project Design Feature
PFCs	Perfluorocarbons
PG&E	Pacific Gas and Electric
p.m.	Post Meridiem (between the hours of noon and midnight)
PM	Particulate Matter
PM _{2.5}	Fine Particulate Matter (2.5 microns or smaller)
PM ₁₀	Fine Particulate Matter (10 microns or smaller)
POLA	Port of Los Angeles
POLB	Port of Long Beach
pp.	pages
ppb	parts per billion
ppm	parts per million
ppt	parts per trillion
PRIMMP	Paleontological Resource Impact Mitigation Monitoring Program
PQP	Public/Quasi-Public
PV	photovoltaic
PVCCSP	Perris Commerce Center Specific Plan
PVCM DP	Perris Valley Channel Master Drainage Plan
PVL	Perris Valley Rail Line
PVMDP	Perris Valley Master Drainage Plan
PVRWRF	Perris Valley Regional Water Reclamation Facility
PVSD	Perris Valley Storm Drain
PWQMP	Preliminary Water Quality Management Plan
Qvofa	Pleistocene alluvial fan deposits
Qyv	younger alluvial valley sediments
RCA	Regional Conservation Authority
RCACCR	Riverside County Assessor County Clerk Recorder
RCACO	Riverside County Agricultural Commissioner's Office
RCALUC	Riverside County Airport Land Use Commission
RCB	Reinforced Concrete Box
RCDEH	Riverside County Department of Environmental Health
RCFC&WCD	Riverside County Flood Control & Water Conservation District
RCFD	Riverside County Fire Department
RCHCA	Riverside County Habitat Conservation Agency

RCIT	Riverside County Information Technology
RCLS	Riverside County Library System
RCP	Reinforced Concrete Pipe
RCSD	Riverside County Sheriff's Department
RCTC	Riverside County Transportation Commission
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
REC	Recognized environmental Conditions
REC1	Water Contact Recreation
REC2	Non-Contact Water Recreation
RIVTAM	Riverside Transportation Analysis Model
ROCs	Reactive Organic Compounds
ROG	Reactive Organic Gases
RPA	Register for Professional Archaeologists
RPS	Renewable Portfolio Standards
RR	Regulatory Requirement
RSLi	Regional Screening Levels for industrial/commercial land use
RTA	Riverside Transit Agency
RTP	Regional Transportation Plan
RTPA	Regional Transportation Planning Agency
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RV	Recreational Vehicle
RWQCB	Regional Water Quality Control Board
RWRF	Regional Water Reclamation Facilities
S	Farmland of Statewide Importance
S	shallow/stony soils
SA	Site Assessment
SB	Senate Bill
SB 18	Bill of Rights for Children and Youth of California
SB 32	Senate Bill 32
SB 375	California Senate Bill 375, Sustainable Communities and Climate Protection Act of 2008
SB 535	Senate Bill 535
SB 610	10910–10915 of the California Water Code
SB 1016	Solid Waste Disposal Measurement Act of 2008
SB 1078	California Renewable Portfolio Standards
SoCAB	South Coast Air Basin
SCAG	Sothern California Association of Governments
SCAQMD	Southern Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SCH	California State Clearinghouse (Office of Planning and Research)

SCS	Sustainable Communities Strategy
SCWR	Southern Cottonwood Willow Riparian
SDAB	San Diego Air Basin
SDG&E	San Diego Gas & Electric
SE	Sand Equivalent
SF/s.f.	square foot or square feet
SF ₆	Sulfur Hexafluoride
SLF	Sacred Lands File
SGC	Southern California Geotechnical
SGC	Strategic Growth Council
SGMA	Sustainable Groundwater Management Act
SHMA	Seismic Hazards Mapping Act
SHPO	State Historic Preservation Offices
SIP	State Implementation Plan
SKR	Stephens' Kangaroo Rat
SLPS	Short-Lived Climate Pollutant Strategy
SMARA	Surface Mining Reclamation Act
SO ₂	Sulfur Dioxide
SOC	Statement of Overriding Considerations
SoCalGas	Southern California Gas Company
SR-60	State Route 60
SRA	State Responsibility Area
STC	Sound Transmission Class
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Regional Control Board
TAC	Toxic Air Contaminants
TAZ	Traffic Analysis Zone
TCR	Tribal Cultural Resources
TDM	Transportation Demand Management
TEA-21	Transportation Equality Act for 21st Century
TMDL	Total Maximum Daily Load
TIA	Traffic Impact Analysis
TOC	Toxic Organic Compounds
TPM	Tentative Parcel Map
TRUs	Transportation Refrigeration Units
TUMF	Transportation Uniform Mitigation Fee
U	Unique Farmland
UCR	University of California, Riverside
U.S.	United States
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency

USDA	U.S. Department of Agriculture
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
UWMP Act	Urban Water Management Planning Act
VdB	Vibration Decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VICS	Voluntary Interindustry Commerce Solutions
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds
VPH	Vehicles per Hour
VVUSD	Val Verde Unified School District
W	Water
WARM	Warm Freshwater Habitat
WB	Wheelbase
Webb	Albert A. Webb
WFP	Water Filtration Plan
WILD	Wildlife Habitat
WoUS	Waters of the United States
WQ	Water Quality
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Governments
WRF	Water Reclamation Facility
WRI	World Resources Institute
WRP	Water Reclamation Plan
WRRRA	Water Reuse and Recycle Act
WSA	Water Supply Assessment
WSCP	Water Shortage Contingency Plan
WSJ	West San Jacinto
X	Other Land
Yr	year
ZE/NSE	Zero- and Near-Zero-emission
ZOI	Zone of Influence

1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

The California Environmental Quality Act (CEQA) (California Public Resources Code, Sections 21000 et seq.) requires that lead agencies consider the potential environmental consequences of projects over which they have discretionary approval authority prior to taking approval action on such projects. An Environmental Impact Report (EIR) is a public document designed to provide local and State government agency decision-makers, special districts, and the public with an analysis of potential environmental consequences to support informed decision making.

This EIR has been prepared to identify, analyze, and mitigate, to the extent feasible, the potential significant environmental effects associated with the construction and implementation of the proposed IDI Rider 2 & 4 High Cube Warehouses and the Perris Valley Storm Drain (PVSD) Channel Improvement Project (herein referred to as the “Project”), which is located within the Perris Valley Commerce Center Specific Plan (PVCCSP) area.

This EIR has been prepared pursuant to the requirements of the CEQA, and the Guidelines for the Implementation of CEQA (State CEQA Guidelines, found at Title 14, California Code of Regulations, Chapter 3, Section 15000 et seq.). As discussed in Section 2.2, Type of EIR, and in accordance with CEQA, this EIR is “tiered” from the *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report* (PVCCSP EIR) (State Clearinghouse [SCH] No. 2009081086) certified by the City of Perris in January 2012. The City of Perris is the lead agency for the Project under CEQA and is responsible for preparing this EIR. The City, as the lead agency, will review and consider the Draft EIR and the Final EIR in its decision to approve, revise, or deny the Project.

A summary description of the proposed development and actions is provided in Section 1.3 below, and a complete description of the Project is provided in Section 3.0, Project Description. This document focuses on those environmental impacts identified as potentially significant in the Notice of Preparation (NOP) completed for this Project (refer to Section 2.3, Scope of this Draft EIR, and Appendix A of this EIR).

The City of Perris has reviewed and revised, as necessary, all submitted drafts, technical studies, and reports for consistency with City policies and requirements and this EIR reflect its own independent judgment. Preparation of this EIR included reliance on appropriate City technical personnel and a review of all technical subconsultant reports.

This Executive Summary has been prepared in accordance with Section 15123(b) of the State CEQA Guidelines, which states that an EIR should contain a brief summary of the proposed actions and its consequences and should identify: 1) each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect; 2) areas of controversy known to the lead agency; and 3) issues to be resolved, including the choice among alternatives and how to mitigate significant effects.

1.2 PROJECT LOCATION AND SETTING

The Project area, which collectively includes the Rider 2 site, the Rider 4 site, the PVSD Channel Improvement area (including the Rider Street bridge), and off-site improvements areas, encompasses approximately 99.2 acres (Rider 2 site: 38.3 acres, Rider 4 site: 26.7 acres, and PVSD Channel improvement area: 29.7 acres). The Project area is located east of Redlands Avenue and west the PVSD Channel, between Morgan Street and Rider Street, within the southeast portion of the PVCCSP area of the City in Perris in Riverside County. The Project area is approximately 1.6 miles east of Interstate 215 (I-215), 0.5 mile south of Ramona Expressway, and 7.0 miles south of State Route (SR)-60. Figure 3-1, *Regional and Project Location*, Section 3.0, Project Description, depicts the regional location and local vicinity of the Project area.

Under existing conditions, the Project area is undeveloped and vacant, except for the eastern portion of the Project area that includes a portion of the PVSD Channel, and the existing Rider Street bridge over the PVSD Channel. The land uses surrounding the Project area include undeveloped vacant land to the north; industrial uses to the west (including the Rider 3 warehouse to the west of the Rider 2 site); vacant land, non-conforming residential uses, and a Southern California Edison (SCE) Substation to the south, across Rider Street; Morgan Park to the northeast; and vacant land to the east, with residential uses further to the east. The Colorado River Aqueduct (CRA) extends underground between the Rider 2 and Rider 4 sites, within Metropolitan Water District (MWD) property and connects to the PVSD Channel within the Project area.

The existing General Plan land use designation and zoning for the Project area is Specific Plan (i.e., the PVCCSP). The Rider 2 and Rider 4 sites are designated for Light Industrial uses in the PVCCSP, and the PVSD Channel is designated for the Future Perris Valley Storm Drain. The MWD property that extends between the Rider 2 and Rider 4 sites is designated Public/Semi-Public Facility, and Trail, including the area that extends into the PVSD Channel improvement area. The PVCCSP land use designation for areas surrounding the Project area to west and south is also Light Industrial. The area north of the Project area is designated as Business Professional Office, and the area immediately to the east of the Project area is within the New Horizons Specific Plan area.

The Rider 2 and Rider 4 sites, located in the Project area's western portion, can be generally be characterized as disced, disturbed, and historically utilized for agricultural purposes. The PVSD Channel is an engineered flood control channel that is maintained on an annual basis by the Riverside County Flood Control and Water Conservation District (RCFC&WCD). The existing Rider Street bridge (State Bridge No. 56C0536) over the PVSD Channel was constructed in 2005 and is a cast-in-place reinforced concrete box culvert (RCB) structure. The Project area is located within the 100-year floodplain and partially located within the floodway hazard area.

The Rider 2 and Rider 4 building sites are relatively flat, descending gradually to the southeast, and are situated at an elevation ranging from approximately 1,430 to 1,450 feet above mean sea level (amsl). The Rider 2 and Rider 4 sites are underlain by native alluvial soils that extend to approximately 50 feet. The Project area consists of approximately 75.9 acres of "Farmland of Statewide Importance," approximately 23.2 acres of "Farmland of Local Importance" and approximately 0.1-acre of "Urban and Built-Up Land."

The Project area is within the Mead Valley Area Plan of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and is not within an MSHCP Criteria Cell, Core or Linkage Area, or Mammal or Amphibian Survey Area. The Project area is in the Criteria Area Plant Species Survey Area, Narrow Endemic Plant Species Survey Area, and Burrowing Owl Survey Area. The PVSD Channel improvement area is a water feature that is mapped as Public/Quasi-Public (PQP) Conserved lands. The Rider 2 and Rider 4 sites include disturbed/developed and ruderal vegetation types. The PVSD Channel improvement area includes the following vegetation/land use types: developed, ruderal (upland), ruderal (channel), and disturbed southern riparian scrub. The PVSD Channel improvement area contains areas under the jurisdiction of the U.S. Army Corps of Engineers (Corps), Regional Water Quality Control Board (RWQCB), and California Department of Fish Wildlife (CDFW). MSHCP Riparian/Riverine area in the Project area occurs wholly within the PVSD Channel improvement area and is identical to that of CDFW jurisdiction. No burrowing owl were observed utilizing the Project study area and no burrowing owl sign was detected during focused surveys conducted for the Project. Additionally, no special-status plant species are expected to occur within the study area due to the lack of suitable habitat.

The Project area is located approximately 2.6 miles southeast of March Air Reserve Base/Inland Port (MARB/IP) and is within the MARB/IP Airport Influence Policy Area. Specifically, the Rider 2 site is within the Outer Horizontal Surface and Approach/Departure Clearance Surface of the Federal Aviation Regulations (FAR), Part 77 (Imaginary Surfaces), and Compatibility Zone C1 and D of the 2014 MARB/IP Airport Land Use Compatibility Plan (ALUCP). The Rider 4 site is within the Outer Horizontal Surface, Transitional, Conical Surface, and Approach/Departure Clearance Surface of the FAR, Part 77 (Imaginary Surfaces), and Compatibility Zone D of the 2014 MARB/IP ALUCP. The Project area is also within the City's Airport Overlay Zone.

1.3 PROJECT DESCRIPTION

The Project involves the construction and operation of up to 1,352,736 square feet (sf) of Class A high cube warehouse buildings on approximately 65 net acres and improvements to a portion of the PVSD Channel, and replacement of the Rider Street bridge over the PVSD Channel. The proposed Rider 2 building would be 804,759 sf and the proposed Rider 4 building would be 547,977 sf; both buildings would consist of warehouse and office space. The buildings are not designed to accommodate any warehouse cold storage or refrigerated uses. The proposed development has been designed in compliance with the applicable Standards and Guidelines in the PVCCSP, including but not limited to landscape, parkway, setback, lot coverage, Floor Area Ratio (FAR), architectural requirements, and residential buffer requirements.

The Project includes an approximately 90-foot wide greenbelt along the Sinclair Street alignment (paper street), north of and outside of the MWD right-of-way. The greenbelt would include a meandering 15-foot wide decomposed granite trail and landscaping and would connect to the regional trail that would be constructed as part of the Project on the west side of the PVSD Channel. The PVCCSP includes a Visual Overlay Zone along I-215 and major roadways. Morgan Street, Redlands Avenue, and Rider Street are designated as a "Major Roadway Visual Corridor" and are subject to the standards and guidelines outlined in Section 4.2.9.2, Major Roadway Visual Zones, of the PVCCSP. Walls and fences would be provided on-site as required for screening, privacy, and security.

Truck traffic generated by the Project would be required to use the City's existing truck routes. At the time this EIR was prepared the planned I-215/Placentia Avenue interchange was under construction.

Following the completion of the I-215/Placentia Avenue interchange, truck drivers would have the option to access I-215 from Placentia Avenue. Regardless of the truck route used, access to the Project area would be provided from Morgan Street, Redlands Avenue, and Rider Street via six Project driveways. Access would also be provided from Sinclair Street. Roadway improvements would be made along Redlands Avenue and Rider Street adjacent to the Project area, and Morgan Street would be constructed east of Redlands Avenue. Automobile and truck parking would be provided for the proposed buildings.

The Project would also include the installation or accommodation for on-site storm drain, water quality, water, sewer, electric, and telecommunications infrastructure systems to serve the proposed industrial uses. The on-site utility infrastructure would connect to existing utilities in the vicinity of the Project area.

The Project's proposed improvements to the PVSD Channel would include the deepening of the PVSD Channel and the widening of the PVSD Channel to 550-feet. The PVSD Channel's right-of-way would extend to 580 feet wide and would include 15-foot wide access roads on each side of the channel until it reaches the CRA. The proposed widening of the PVSD Channel would also require replacing the existing Rider Street bridge over the Channel. The proposed bridge would be a 5-span continuous slab structure, 260 feet long and 78 feet 6 inches wide. There would be four piers in the channel and two abutments at the banks. The abutments and pier columns would be supported by six 30-inch diameter cast-in-drilled-hole concrete piles; no pile driving would be required to construct the bridge.

It is estimated that construction of the Project and PVSD Channel improvements would occur over an approximate 14-month period. If the Rider Street bridge is constructed in one stage, it would occur during this same construction period, while construction of the Rider Street bridge in two stages would extend the overall construction period by 5 months. The excavated soils from the PVSD Channel would be placed on the Rider 2 and Rider 4 sites to elevate the sites above the 100-year flood plain. The soils would be moved from the Channel to the building sites using scrapers, which would eliminate the need for heavy trucks to haul the soil. It is estimated that the Project would require approximately 180,000 cubic yards of earth work.

The Project's proposed light industrial uses and PVSD Channel improvements are consistent with the PVCCSP. The Project would not require a Specific Plan Amendment, General Plan Amendment, or Zone Change. The Project involves a Development Plan Review (DPR) (Case No. 19-00004), Tentative Parcel Map (TPM) No. 37437 (Case No. 19-05-058), and Tentative Parcel Map (TPM) No. 37438 (Case No. 19-05-096), which are further described in Section 3.7, Summary of Requested Actions, of this EIR.

1.3.1 PROJECT ALTERNATIVES

In accordance with Section 15126.6 of the State CEQA Guidelines, Section 5.0 of this EIR addresses alternatives that can eliminate or reduce the potentially significant impacts of the Project. Section 5.0 provides descriptions of each alternative, a comparative analysis of the potential environmental effects of each alternative to those associated with the Project, and a discussion of each alternative's ability to meet the Project objectives. Following is a summary description of the alternatives evaluated in this EIR. For a more detailed discussion of these alternatives and the relative impacts associated with each alternative compared to the Project, refer to Section 5.0, Alternatives. As required by CEQA, Section 5.0 also identifies alternatives considered but eliminated from detailed analysis, and the environmentally superior alternative.

- **Alternative 1 – No Project/No Development.** Under the No Project/No Development Alternative, the proposed development of two Class A high cube warehouse buildings and associated parking, infrastructure, and landscaping would not occur. Additionally, the planned regional PVSD Channel improvements would not be implemented. The Project area would remain in its current condition, and the Rider 2 and Rider sites would remain vacant. This No Project Alternative was evaluated in accordance with Section 15126.6(e)(3) of the State CEQA Guidelines.
- **Alternative 2 – Reduced Intensity Alternative.** Under the Reduced Intensity Alternative, the Project area would be developed with two industrial buildings with a total square footage of 1,014,552 sf. This represents a reduction in development of 338,184 sf compared to the Project (approximately 25 percent). The PVSD Channel improvements would also be implemented. It is assumed that the buildings would have a similar configuration as the Project and other components of the Project related to access, landscaping, infrastructure, and other amenities would be the same. The purpose of the Reduced Intensity Alternative is to address significant and unavoidable impacts of the Project related to operational air quality, GHG emissions, and off-site traffic-related noise impacts.
- **Alternative 3 – Reduced Development Area/One Building Alternative (Rider 2 Building).** Under this alternative, the Rider 4 building would not be constructed as part of the Project; the development would be limited to the Rider 2 building and the PVSD Channel improvements (including the Rider Street bridge), consistent with the Project. Under this alternative, the physical impact area would be reduced from 69.5 acres (including on-site and off-site improvement areas) to 39.1 acres. The physical impact area associated with the PVSD Channel improvements would remain at 29.7 acres. Although the Rider 4 site would not be developed under this alternative, soil removed from the PVSD Channel would still be placed on the Rider 4 site. As with the Project, under this alternative, the Rider 2 building would consist of one Class A high cube, non-refrigerated warehouse building with a total square footage of 804,759 sf. As with the Project, access to the site would be provided from access points along Redlands Avenue and Rider Street. It should be noted that this Alternative would only delay, but not eliminate the ultimate development of the Rider 4 building site pursuant to the approved PVCCSP, which anticipates development of the Rider 4 site with Light Industrial uses. The purpose of this alternative is to address significant and unavoidable impacts of the Project related to regional construction and operational air pollutant emissions, GHG emissions, and off-site traffic related noise.
- **Alternative 4 – Alternative Use Compliant with the PVCCSP.** Under this alternative, the Rider 2 building and the PVSD Channel improvements (including the Rider Street bridge) would be implemented, consistent with the Project. However, an approximately 9-acre trailer storage yard would be implemented on the Rider 4 site, rather than the Rider 4 building. The trailer storage yard, as an accessory use to the Rider 2 building, is allowed by the PVCCSP. The trailer storage yard would be located in the western portion of the Rider 4 site along Redlands Avenue, and would accommodate approximately 320 trailer parking stalls (10 feet by 53 feet). Access could be provided from Morgan Street, which would also be constructed under this alternative or from Sinclair Street. No access would be provided from Redlands Avenue. An office area would be provided in the northern portion of the trailer storage yard, along with automobile parking. A screen wall would be provided along northern, western, and southern perimeters of the trailer yard. Project area would also be developed with an accessory trailer storage yard, which would include 320 trailer parking stalls. Landscaping and lighting would be installed in compliance with the

Standards and Guidelines identified in the PVCCSP. Under this alternative, the physical impact area for the Rider 2 and Rider 4 sites would be reduced. Although the Rider 4 site would not be developed under this alternative, soil removed from the PVSD Channel would still be placed over the entire Rider 4 site. The purpose of this alternative is to address significant and unavoidable impacts of the Project related to regional construction and operational air pollutant emissions, GHG emissions, and off-site traffic related noise.

1.4 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the State CEQA Guidelines requires that an EIR contain a discussion of issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With respect to the Project, the key issues to be resolved include decisions by the City of Perris as lead agency, as to:

- Whether this environmental document adequately describes the potential environmental impacts of the Project.
- Whether the recommended mitigation measures should be modified and/or adopted.
- Whether the Project benefits override those environmental impacts that cannot be feasibly avoided or mitigated to a less than significant level.
- Whether there are other mitigation measures that should be applied to the Project besides those identified in this EIR.
- Whether there are any alternatives to the Project that would substantially lessen any of its significant impacts while achieving most of the basic Project objectives.

1.5 AREAS OF CONTROVERSY

Section 15123(b)(2) of the State CEQA Guidelines indicates that an EIR summary should identify areas of controversy known to the lead agency, including issues raised by agencies and the public. This EIR has taken into consideration the comments received from the public and various agencies in response to the NOP and a public scoping meeting with the City of Perris Planning Commission. Written comments received during the NOP and scoping period are contained in Appendix A. Environmental issues that have been raised during opportunities for public input on the project are summarized in Section 2.3, Scope of this EIR, and are addressed in each relevant issue area analyzed in Section 4.0 of this EIR.

Based on input received from the public during the scoping process, there are no areas of controversy known to the City at this time. However, concerns have been raised about Project and cumulative air quality and health risks to sensitive receptors from Project operations, including emission from trucks.

1.6 SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS

Table 1-1, presents a summary of the environmental impacts resulting from the proposed IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project. Table 1-1 addresses those topical

issues and associated thresholds for which it was determined in the NOP that impacts would be potentially significant and Project-level analysis has been provided in this EIR. Topics for which it was determined that no further analysis is required in this EIR are discussed in Section 6.0, Other CEQA Considerations and include: mineral resources, population and housing, public services, recreation and wildfire.

The environmental issue areas identified for study this EIR are aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas (GHG) emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, transportation, tribal cultural resources, and utilities and service systems. The potential Project and cumulative impacts for these topical issues are addressed in Section 4.0 of this EIR. Growth-inducing impacts and significant irreversible environmental changes are addressed in Section 6.0, Other CEQA Considerations.

For each environmental topic, Table 1-1 includes required PVCCSP EIR mitigation measures that have been incorporated into the Project and assumed as part of the analysis for potential impacts. Additional Project-level mitigation measures are identified for impacts determined to be potentially significant. As shown in Table 1-1, the Project would result in less than significant impacts with the incorporation of PVCCSP EIR mitigation measures, and Project-level mitigation measures for the following topical issues evaluated in this EIR:

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Cultural Resources
- Energy
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

As described below, significant and unavoidable air quality, GHG emissions, and noise impacts resulting from the Project are identified in this EIR. Because the Project would result in unavoidable significant adverse impacts, the City, as the lead agency, must prepare a “Statement of Overriding Considerations” before it can approve the Project. A Statement of Overriding Considerations (SOC) states that the decision-making body has balanced the benefits of the Project against its unavoidable significant environmental effects and has determined that the benefits of the Project outweigh the adverse effects and, therefore, the adverse effect are acceptable. A summary of the significant and unavoidable impacts of the Project is included below.

- **Cumulatively Considerable Net Increase of a Criteria Pollutant.** Long-term nitrogen oxides (NOx) emissions from construction of the Project (including the PVSD Channel improvements and Rider Street bridge), and mobile sources during operation, would exceed established South Coast Air Quality Management District (SCAQMD) thresholds of significance. Because NOx is an ozone (O₃) precursor, this could result in additional violations of the State and federal O₃ standards. O₃ is a nonattainment pollutant. There are no additional feasible mitigation measures beyond those identified to reduce the project’s NOx emissions during construction and operation to a less than significant level. Therefore, this impact would be significant and unavoidable.
- **Cumulative Greenhouse Gas Emissions.** The Project’s GHG emissions would exceed the SCAQMD’s recommended 10,000 million tons of carbon dioxide equivalent per year (MTCO₂e/yr)

screening threshold for industrial projects. Therefore, the cumulative impact of the Project related to GHG emissions would be significant and unavoidable.

- **Off-site Traffic Noise Impacts (Project and Cumulative).** Off-site Project-generated traffic noise would exceed the established threshold of significance along one roadway segment adjacent to sensitive noise receivers with trucks using only the Harley Knox Boulevard/I-215 interchange under Existing Plus Project and Cumulative traffic conditions. With truck use of only the Placentia Avenue/I-215 interchange off-site Project-generated traffic noise would be significant along one roadway segment adjacent to sensitive noise receivers under Existing Plus Project conditions, and two roadway segments under Cumulative conditions. There is no feasible mitigation for these impacts resulting in significant and unavoidable Project and Cumulative off-site traffic noise level impacts.

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
4.1 AESTHETICS		
<i>Less Than Significant Impacts</i>		
<p>Have a substantial adverse effect on a scenic vista. Implementation of the Project would preserve existing views of scenic vistas in the Project area. Impacts would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p>Substantially degrade scenic resources with a State scenic highway. The Project area is not within a State scenic highway corridor and does not contain any scenic resources such as trees, rock outcroppings, and historic buildings. Therefore, the Project would not substantially degrade scenic resources in a state scenic highway. It should be noted that the Project area is in proximity to a Major Roadway Visual Corridor. As such, the Project would be required to comply with the Design Standards and Guidelines outlined in the PVCCSP. Impacts would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p>Substantially degrade the existing visual character of the site. The Project would introduce industrial buildings and associated facilities to the Project area, which is undeveloped. This would change the visual character of the site. However, the Project would be designed and constructed in compliance with applicable PVCCSP Standards and Guidelines and would involve an attractive, well-designed development using architectural elements, landscaping, and project design. Impacts would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>Light during operation, and glare during construction and operation. Implementation of the Project would introduce new sources of light and glare. All lighting would be subject to lighting requirements contained in the PVCCSP, the City's Municipal Code, and the County of Riverside Ordinance No. 655 which establishes lighting restrictions. Operational impacts related to lighting would be less than significant.</p> <p>Building materials would be subject to the PVCCSP Standards and Guidelines related to exterior materials and would not include reflective surfaces that result in substantial glare. No impact related to glare during construction or operation would occur.</p>	<p>No mitigation is required.</p> <p>Refer to MM Haz 3 and MM Haz 5, which address potential hazards to MARB/IP Airport operations but are also relevant to the analysis of light and glare impacts.</p>	<p>Less than Significant</p>
<p>Potentially Significant Impacts</p>		
<p>Light during construction. Due to the proximity of single-family residences to the Project area, temporary construction security lighting may cause a potentially significant impact in the form of a nuisance to the residents. Implementation of mitigation measure MM 1-1 would reduce Project-specific and potential cumulative construction-related lighting impacts to a less than significant level.</p>	<p>Additional Project-Level Mitigation Measures</p> <p>MM 1-1 Prior to the issuance of grading permits, the Property Owner/Developer shall provide evidence to the City that the Contractor Specifications require that: (1) construction staging areas shall be located as far as possible from residences east and south of the Project area; and, (2) any temporary nighttime lighting installed during construction for security or any other purpose shall be downward facing and hooded or shielded to prevent security light from spilling outside the staging area or from directly broadcasting security light into the sky, onto adjacent residential properties, or into the PVSD Channel. Compliance with this measure shall be verified by the City of Perris' Building Division during construction.</p>	<p>Less Than Significant</p>

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
4.2 AGRICULTURAL RESOURCES		
<i>Less Than Significant Impact</i>		
<p>Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. Implementation of the Project would result in the loss of approximately 75.9 acres of Farmland of Statewide Importance, and 23.2 acres of Farmland of Local Importance. Based on review of the Project using the California Agricultural Land Evaluation and Site Assessment (LESA) Model, the Project's impact to Farmland would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p>Conflict with existing zoning for agricultural use or Williamson Act Contract. The Project area is not zoned for agricultural use. Additionally, the Project area is not within an area of the City that contains active Williamson Act Contracts. No impacts would occur.</p>	<p>No mitigation is required.</p>	<p>No Impact</p>
<p>Conflict with existing zoning or cause rezoning of forest land or Timberland.</p> <p>Result in the loss of forest land or conversion of forest to a non-forest use.</p> <p>Implementation of the Project would not conflict with areas currently zoned as forest, timberland, or Timberland Production, and would not result in the loss or conversion of forest land. No impacts would occur.</p>	<p>No mitigation is required.</p>	<p>No Impact</p>

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>Involve other changes to the existing environment that would result in the conversion of Farmland to non-agricultural use or conversion of forest land to a non-forest use. No agricultural activities occur in the Project area. The Project would result in a less than significant impact related to the conversion of Farmland to non-agricultural uses. Additionally, the Project would not involve other changes in the existing environment that would result in the conversion of forest land to a non-forest use. Impacts would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p>4.3 AIR QUALITY</p>		
<p>Less Than Significant Impacts</p>		
<p>Air Quality Management Plan consistency. The Project is compliant with the City's General Plan land use designation for the Project area and population projections; therefore, the proposed Project would not conflict with or obstruct implementation of the AQMP.</p>	<p>No mitigation is required.</p>	<p>No Impact</p>
<p>Exposure of sensitive receptors to substantial pollutant concentrations.</p> <p>With incorporation of PVCCSP EIR mitigation measures, Project construction activities would not exceed SCAQMD localized significance thresholds for criteria pollutant emissions. This impact would be less than significant.</p> <p>Project operations would not exceed SCAQMD localized significance thresholds for criteria pollutant</p>	<p>Applicable PVCCSP Mitigation Measures</p> <p>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:</p> <ul style="list-style-type: none"> • 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, 	<p>Less Than Significant</p>

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>emissions. This impact would be less than significant.</p> <p>Project-related DPM emissions during construction would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.</p> <p>DPM emissions during operation would not result in health risks that exceed the SCAQMD thresholds for cancer risk and non-cancer risk (Hazard Index). This impact would be less than significant.</p> <p>The Project would not produce the volume of traffic required to generate a CO "hot spot" and localized air quality impacts related to mobile-source emissions would therefore be less than significant.</p>	<ul style="list-style-type: none"> • 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 area, • 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 PM10 generation, • sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks when sweeping streets to remove visible soil materials, • replacement of ground cover in disturbed areas as quickly as possible. <p>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 EPA certified technologies. Diesel equipment shall use water emulsified diesel fuel such as PuriNOx unless it is unavailable in Riverside County at the time of project construction activities. Contract specifications shall be included in project construction documents, which shall be reviewed by the City of Perris' Building Division prior to issuance of a grading permit.</p> <p>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.</p>	

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
	<p>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. This mitigation measure has been completed with preparation of the Project-specific Air Quality Impact Analysis included in Appendix B of this EIR.</p> <p>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 [Transport Refrigeration Units] 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. This mitigation measure has been completed with preparation of Project-specific Health Risk Assessments included in Appendix B of this EIR.</p>	
<p>Result in other emissions (such as those leading to odors). The Project's construction odor emissions would be temporary and short-term and intermittent in nature. Additionally, construction odor emissions would cease upon completion of construction activities. Moreover, the Project's operation does not propose or require any land uses that are typically associated with emitting objectionable odors. Impacts would be less than significant</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
Potentially Significant Impacts		
<p>Cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment. Even with implementation of applicable PVCCSP EIR mitigation measures, emissions resulting from the Project construction would exceed the regional thresholds established by the SCAQMD for NOx emissions. The exceedance of the NOx threshold is primarily associated with the overlap in construction activities and associated vendor trips. There are no additional feasible mitigation measures.</p> <p>Even with implementation of the PVCCSP EIR operational mitigation measures, operational NOx emissions would also exceed the regional significance thresholds. The operational emissions are primarily associated with vehicle emissions. and Additional Project-specific mitigation measures MM 3-1 through MM 3-14 would reduce operational NOx emissions. However, the City of Perris and the Project Applicant do not have regulatory</p>	<p>Applicable PVCCSP Mitigation Measures</p> <p>Previously referenced PVCCSP EIR mitigation measures MM Air 3, MM Air 6 and MM Air 9.</p> <p>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. This mitigation measure has been completed with preparation of the Project-specific Air Quality Impact Analysis included in Appendix B of this EIR.</p> <p>MM Air 2 Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck</p>	<p>Significant and Unavoidable</p>

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>authority to control tailpipe emissions and no additional feasible mitigation measures beyond the measures identified herein exist that would reduce NOx emissions to levels below the regional thresholds established by the SCAQMD.</p> <p>Therefore, construction and operation of the Project would contribute to existing violations of the O₃ standard (NOx is an O₃ precursor). Therefore, the Project would result in a significant and unavoidable cumulatively considerable net increase of a criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.</p>	<p>deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.</p> <p>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.</p> <p>MM Air 5 Electricity from power poles shall be used instead of temporary diesel or gasoline-powered generators to reduce the associated emissions. Approval will be required by the City of Perris' Building Division prior to issuance of grading permits.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>Significant and Unavoidable</p>

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
	<p>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.</p> <p>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.</p> <p>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.</p> <p>MM Air 20 Each implementing development project shall be encouraged to implement, at a minimum, an increase in each building's energy efficiency 15 percent beyond Title 24, and reduce indoor water use by 25 percent. All requirements would be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.</p> <p>Additional Project-Level Mitigation Measures</p> <p>MM 3-1 Prior to issuance of occupancy permits for the proposed buildings, the Project Applicant shall provide evidence to the City of Perris Building Division that legible, durable, weather-proof signs have been placed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations. At a minimum, each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than five (5) minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and 3) telephone numbers of the building facilities manager and the CARB to report violations.</p> <p>MM 3-2 Prior to issuance of occupancy permits, the Project Applicant or successor in interest shall provide documentation to the City demonstrating that occupants/tenants of the proposed buildings have been or will be provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.</p> <p>MM 3-3 Prior to the issuing of each building permit, the Project Applicant and its contractors shall provide plans and specifications to the City of Perris Building Division that demonstrate that each building is designed for passive heating and cooling, and is designed to include</p>	

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
	<p>natural light. Features designed to achieve this shall include the proper placement of windows, overhangs, and skylights.</p> <p>MM 3-4 Prior to the issuing of each building permit, the Project Applicant and its contractors shall provide plans and specifications to the City of Perris Building Division that demonstrate that electrical service is provided to each of the areas in the vicinity of the buildings that are to be landscaped in order that electrical equipment may be used for landscape maintenance.</p> <p>MM 3-5 The Project Applicant shall include in all future lease agreements for the proposed buildings a requirement that all building tenants must utilize electric equipment for landscape maintenance to the extent feasible.</p> <p>MM 3-6 The Project Applicant shall include in all future lease agreements for the proposed buildings a requirement that all building tenants shall utilize only electric or natural gas service yard trucks (hostlers), pallet jacks and forklifts, and other onsite equipment. Electric-powered service yard trucks (hostlers), pallet jacks and forklifts, and other onsite equipment shall also be required instead of diesel-powered equipment, if technically feasible. Yard trucks may be diesel fueled in lieu of electrically or natural gas fueled provided such yard trucks are at least compliant with California Air Resources Board (CARB) 2010 standards for on-road vehicles or CARB Tier 4 compliant for off-road vehicles.</p> <p>MM 3-7 Upon occupancy, the facility operator shall require tenants that do not already operate 2010 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, SmartWay Finance, or other similar funds. If awarded, the tenant shall be required to accept and use the funding. Tenants shall be encouraged to consider the use of alternative fueled trucks as well as new or retrofitted diesel trucks. Tenants shall also be encouraged to become SmartWay Partners, if eligible. This measure shall not apply to trucks that are not owned or operated by the facility operator or facility tenants since it would be infeasible to prohibit access to the site by any truck that is otherwise legal to operate on California roads and highways. The facility operator shall provide an annual report to the City of Perris Development Services Department. The report shall: one, list each engine design; two, describe the effort made by each tenant to obtain funding to upgrade their fleet and the results of that effort; and three, describe the change in each fleet composition from the prior year.</p> <p>MM 3-8 Tenants who employ 250 or more employees on a full- or part-time basis shall comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. The purpose of this rule is to provide employees with a menu of options to reduce employee commute vehicle emissions. Tenants with less than 250 employees or tenants with 250 or more employees</p>	

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
	<p>who are exempt from SCAQMD Rule 2202 (as stated in the Rule) shall either (a) join with a tenant who is implementing a program in accordance with Rule 2202 or (b) implement an emission reduction program similar to Rule 2202 with annual reporting of actions and results to the City. The tenant-implemented program would include, but not be limited to the following:</p> <ul style="list-style-type: none"> • Appoint a Transportation Demand Management (TDM) coordinator who would promote the TDM program, activities and features to all employees. • Create and maintain a “commuter club” to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work. • Inform employees of public transit and commuting services available to them (e.g., social media, signage). • Provide on-site transit pass sales and discounted transit passes. • Guarantee a ride home. • Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted. • Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.” <p>MM 3-9 Prior to the issuance of a building permit, the Project Applicant shall provide evidence to the City of Perris Building Division that loading docks are designed to be compatible with SmartWay trucks.</p> <p>MM 3-10 Upon occupancy and annually thereafter, the facility operator shall provide information to all tenants, with instructions that the information shall be provided to employees and truck drivers as appropriate, regarding:</p> <ul style="list-style-type: none"> • Building energy efficiency, solid waste reduction, recycling, and water conservation. • Vehicle GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting. • Participation in the Voluntary Interindustry Commerce Solutions (VICS) “Empty Miles” program to improve goods trucking efficiencies. • Health effects of diesel particulates, State regulations limiting truck idling time, and the benefits of minimized idling. • The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity. <p>MM 3-11 Prior to issuance of a building permit, the Project Applicant shall provide the City of Perris Building Division with an onsite signage program that clearly identifies the required onsite</p>	

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
	<p>circulation system. This shall be accomplished through posted signs and painting on driveways and internal roadways.</p> <p>MM 3-12 Prior to issuance of occupancy permits, the City of Perris Building Division shall confirm that signs clearly identifying approved truck routes have been installed along the truck routes to and from the Project area.</p> <p>MM 3-13 Prior to issuance of an occupancy permit, the Project Applicant shall install a sign on the property with telephone, email, and regular mail contact information for a designated representative of the tenant who would receive complaints about excessive noise, dust, fumes, or odors. The sign shall also identify contact data for the City for perceived Municipal Code violations. The tenant's representative shall keep records of any complaints received and actions taken to communicate with the complainant and resolve the complaint. The tenant's representative shall endeavor to resolve complaints within 24 hours.</p> <p>MM 3-14 Prior to issuance of a building permit, the Project Applicant shall provide the City of Perris Building Division with project specifications, drawings, and calculations that demonstrate that main electrical supply lines and panels have been sized to support heavy truck charging facilities when these trucks become available. The calculations shall be based on reasonable predictions from currently available truck manufacturer's data. Electrical system upgrades that exceed reasonable costs shall not be required.</p>	
4.4 BIOLOGICAL RESOURCES		
<i>Less Than Significant Impacts</i>		
<p>Have a substantial adverse effect on a candidate, sensitive, or special status species through habitat modification. The Project would impact approximately 69.5 acres of disturbed habitat types, including 0.80 acre of disturbed/developed land and up to 68.7 acres of ruderal vegetation located on the western portion of the Project, which does not support native or natural vegetation communities. The Project would temporarily impact approximately 0.2 acre of disturbed southern riparian</p>	<p>Applicable PVCCSP Mitigation Measures</p> <p>MM Bio 1 In order to avoid violation of the MBTA and the California Fish and Game Code, site-preparation activities (removal of trees and vegetation) for all PVCC implementing development and infrastructure projects shall be avoided, to the greatest extent possible, during the nesting season (generally February 1 to August 31) of potentially occurring native and migratory bird species.</p> <p>If site-preparation activities for an implementing project are proposed during the nesting/breeding season (February 1 to August 31), a pre-activity field survey shall be conducted by a qualified biologist prior to the issuance of grading permits for such project, to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not located within</p>	<p>Less Than Significant</p>

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>scrub within the eastern portion of the site within the PVSD Channel. This riparian area is not anticipated to support high-value biological functions. No impacts to special status plant species would occur due the lack of habitat.</p> <p>The Project area is within the Stephen's Kangaroo Rat Habitat Conservation Plan (SKR HCP). Although SKR is not expected to occur within the Project area, the Project would be required to pay fees to the HCP to reduce potential impacts to SKR to a less than significant level.</p> <p>Implementation of the Project would result in the permanent or temporary loss of marginal foraging habitat for the golden eagle, loggerhead shrike, northern harrier, San Diego black-tailed jackrabbit. However, the impacted lands are routinely disked and support non-native vegetation; therefore, the impact would be less than significant. Additionally, these species are covered under the MSHCP with any potential impacts mitigated through compliance with the MSHCP.</p> <p>A single burrowing owl was observed north of the Project area. No burrowing owl individuals or signs of burrowing owl use were observed within the Project area during focused surveys; however, the Project area has the potential to support burrowing owls in the future based on the presence of foraging habitat and the mercurial nature of burrowing owl. With implementation of MM Bio 2 from the PVCCSP EIR, the Project's</p>	<p>the implementing project area and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.</p> <p>MM Bio 2 Project-specific habitat assessments and focused surveys for burrowing owls will be conducted for implementing development or infrastructure projects within burrowing owl survey areas. A pre-construction survey for resident burrowing owls will also be conducted by a qualified biologist within 30 days prior to commencement of grading and construction activities within those portions of implementing project sites containing suitable burrowing owl habitat and for those properties within an implementing project site where the biologist could not gain access. If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity will be conducted in accordance with the current Burrowing Owl Instruction for the Western Riverside MSHCP.</p> <p>If active nests are identified on an implementing project site during the pre-construction survey, the nests shall be avoided or the owls actively or passively relocated. To adequately avoid active nests, no grading or heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31), and 160 feet during the non-breeding season.</p> <p>If burrowing owls occupy any implementing project site and cannot be avoided, active or passive relocation shall be used to exclude owls from their burrows, as agreed to by the City of Perris Planning Division and the CDFG. Relocation shall be conducted outside the breeding season or once the young are able to leave the nest and fly. Passive relocation is the exclusion of owls from their burrows (outside the breeding season or once the young are able to leave the nest and fly) by installing 1-way doors in burrow entrances. These 1-way doors allow the owl to exit the burrow, but not enter it. These doors shall be left in place 48 hours to ensure owls have left the burrow. Artificial burrows shall be provided nearby. The implementing project area shall be monitored daily for 1 week to confirm owl use of burrows before excavating burrows in the impact area. Burrows shall be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible pipe shall be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow. The CDFG shall be consulted prior to any active relocation</p>	

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>potential impacts to burrowing owls would be less than significant.</p> <p>The Project has the potential to impact active bird nests if vegetation is removed during the nesting season. With implementation of MM Bio 1 from the PVCCSP EIR, the Project's potential impacts to nesting birds would be less than significant.</p> <p>During the widening of the PVSD Channel, there would be potential impacts to occur to wetlands and riparian habitat. The Project Applicant would implement measures consistent with the MSHCP Guidelines to ensure that the Project's potential impacts to wetlands and riparian habitat would be less than significant.</p>	<p>to determine acceptable receiving sites available where this species has a greater chance of successful long-term relocation. If avoidance is infeasible, then a DBESP will be required, including associated relocation of burrowing owls. If conservation is not required, then owl relocation will still be required following accepted protocols. Take of active nests will be avoided, so it is strongly recommended that any relocation occur outside of the nesting season.</p>	

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Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>Have a substantial adverse effect on riparian habitat or other sensitive natural community.</p> <p>Have a substantial adverse effect on federally protected wetlands.</p> <p>The Rider 2 and Rider 4 building sites and off-site improvement areas do not contain jurisdictional waters or wetlands. Additionally, the PVSD channel improvement area does not contain any federally protected wetlands. The Project's proposed improvements to the PVSD Channel would have temporary and permanent impacts to jurisdictional water and riverine/riparian areas. However, because the PVSD Channel improvements consist of widening the existing the PVSD Channel, the Project is self-mitigating as it would increase the amount of jurisdictional waters beyond pre-Project conditions by up to 20 acres. Additionally, the Project would implement MM Bio 3 and MM Bio 4 from the PVCCSP EIR. Impacts would be less than significant.</p>	<p>Applicable PVCCSP Mitigation Measures</p> <p>MM Bio 3 Project-specific delineations will be required to determine the limits of ACOE, RWQCB, and CDFG jurisdiction for implementing projects that may contain jurisdictional features. Impacts to jurisdictional waters will require authorization by the corresponding regulatory agency. If impacts are indicated in an implementing project-specific delineation, prior to the issuance of a grading permit, such implementing projects will obtain the necessary authorizations from the regulatory agencies for proposed impacts to jurisdictional waters. Authorizations may include, but are not limited to, a Section 404 permit from the ACOE, a Section 401 Water Quality Certification from the RWQCB, and a Section 1602 Streambed Alteration Agreement from CDFG.</p> <p>MM Bio 4 Project-specific mapping of riparian and unvegetated riverine features will be required for implementing projects pursuant to Section 6.1.2 of the MSHCP. For areas not excluded as artificially created, the MSHCP requires 100 percent avoidance of riparian/riverine areas. If for any implementing project avoidance is not feasible, then such implementing projects will require the approval of a DBESP including appropriate mitigation to offset the loss of functions and values as they pertain to the MSHCP covered species. Riparian vegetation will also need to be evaluated for the least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo.</p>	<p>Less Than Significant</p>
<p>Interfere with the movement of wildlife or impede the use of a wildlife nursery. The Project area does not support movement of migratory fish, or wildlife nurseries. Additionally, there are no MSHCP Cores or Linkages adjacent to or within the Project area. Impacts to wildlife movement would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p>Conflict with local policies or ordinances protecting biological resources. As discussed above, any potential impacts to SKR would be less</p>	<p>No mitigation is required.</p>	<p>No impact</p>

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>than significant with payment of the required SKR HCP fee. Additionally, the Project Applicant would pay required MSCHP fees to the City of Perris. The Project would not conflict with policies or ordinances in place to protect biological resources.</p>		
<p>Conflict with a Habitat Conservation Plan, Natural Conservation Community Plan. The Project area does not occur within an MSHCP Criteria area nor is it located within any Criteria Cell. As such, the Project is not required to set aside conservation lands pursuant to the MSHCP, and the Project is not subject to the MSHCP's Habitat Evaluation and Acquisition Negotiation Strategy (HANS) process nor Joint Project Review (JPR). Accordingly, the Project would not conflict with the MSHCP Reserve Assembly requirements.</p> <p>As required by MM Bio 4, the Project is subject to the Determination of Biologically Equivalent or Superior Preservation (DBESP) process, and fulfillment of this requirement would be consistent with Volume I, Section 6.1.2 of the MSHCP.</p> <p>The Project is located in the NEPSSA but would not result in impacts to NEPSSA target species as the habitat evaluations for this plant species concluded that habitat for NEPSSA target species was absent from the Project area. As such, the Project would be consistent with Section 6.1.3 of the MSHCP.</p>	<p>Applicable PVCCSP Mitigation Measures</p> <p>Previously referenced mitigation measure MM Bio 2.</p> <p>Additional Project-Level Mitigation Measures</p> <p>Previously referenced mitigation measure MM 1-1.</p> <p>MM 4-1 Prior to the issuance of a grading permit for the PVSD Channel, the Project Applicant shall provide written evidence to the City of Perris that the contractor specifications require installation of orange silt fencing to demarcate the limits of disturbance in the PVSD Channel, and that a qualified biological monitor has been retained to oversee installation of the orange silt fencing and all preliminary vegetation removal. Initial grading shall be monitored by a qualified biologist to ensure no encroachment beyond the limits of disturbance in the PVSD Channel would occur.</p> <p>MM 4-2 Prior to the issuance of grading permits, if grading and/or construction activities are scheduled to occur during the breeding season (February 1 to August 31), the City of Perris shall verify that the following requirements are shown on the grading and/or building permit plans:</p> <ul style="list-style-type: none"> A. No clearing, grubbing, grading, or other construction shall occur between February 1 to August 31, until the following requirements have been met to the satisfaction of the Planning Manager: <ul style="list-style-type: none"> i. A qualified Biologist shall survey Public/Quasi-Public (PQP) Conserved Lands (PVSD Channel) that would be subject to construction noise levels exceeding 65 dBA Leq for nesting birds. Preconstruction surveys shall be conducted by a qualified Biologist prior to grading activities. ii. No construction activities shall be initiated where construction activities would result in noise levels exceeding 65 dBA Leq within 300 feet of known burrowing owl and nesting bird territories. Noise levels shall be determined by an acoustician deemed qualified by the Planning Manager. OR 	<p>Less Than Significant</p>

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>The Rider 2 and Rider 4 sites are adjacent to the PVSD Channel, which is classified as PQP land. Therefore, the MSHCP Urban/Wildland Interface Guidelines apply to the Project. The Project Applicant would implement MM 1-1, MM 4-1, and MM 4-2 to comply with the Guidelines. With implementation of MM 4-1 and MM 4-2, impacts would be less than significant.</p>	<p>iii. Under the direction of a qualified Acoustician, noise attenuation measures (such as sound walls, hay bales, or other measures designed to reduce effects from Project noise levels) shall be installed to ensure noise levels from construction activities shall not exceed 65 dBA Leq within 300 feet of known burrowing owl and nesting bird territories. Concurrent with construction and the noise attenuation measures, noise monitoring shall be conducted to ensure that noise levels do not exceed 65 dBA Leq.</p> <p>B. If preconstruction surveys demonstrate that burrowing owl and nesting birds are not present, the project Biologist shall submit a report with substantial evidence to the City of Perris that demonstrates noise attenuation measures are not necessary. The report shall describe the methodology and results of negative preconstruction survey.</p>	
<p>4.5 CULTURAL RESOURCES</p>		
<p>Less Than Significant Impacts</p>		
<p>Historical resources. Based on the lack of historic resources or evidence of previously existing resources in the Project area, including the PVSD Channel, no impacts related to historic resources would occur.</p>	<p>No mitigation is required.</p>	<p>No Impact</p>
<p>Human remains. The PVCCSP area has been historically used for agricultural use and is, therefore, not expected to contain human remains including those interred outside of formal cemeteries. However, compliance with Section 7050.5 of the <i>California Health and Safety Code</i> and Section 5097.98 of the <i>California Public Resources Code</i> would ensure that impacts to human remains, in the unlikely event they are encountered, would be less than significant. Additionally, MM 5-2, which implements PVCCSP EIR MM Cult 6, as subsequently revised by the City of Perris, further identifies measures that would be taken in the event of the discovery of human remains, and would</p>	<p>Additional Project-Level Mitigation Measure</p> <p>MM 5-2 In the event that human remains (or remains that may be human) are discovered within the Project area 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).</p> <p>If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the “Most Likely Descendent” (MLD). Despite the affiliation with any Luiseño tribal representative(s) at the site, the NAHC’s identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of Native American human remains and may recommend to the project proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave goods. The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48</p>	<p>Less Than Significant</p>

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>be implemented to further reduce this less than significant impact.</p>	<p>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 median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98l and 5097.94(k)).</p> <p>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 shall be filed with the Eastern Information Center (EIC).</p>	
<p>Potentially Significant Impacts</p>		
<p>Archaeological resources. Although no archaeological resources are recorded within the Project area and the area has been disturbed, the previous disturbance has not occurred to a depth that would destroy all the archaeological resources that might exist in the subsurface. Incorporation of MM 5-1, which implements PVCCSP EIR MM Cult 2, would reduce impacts if archaeological resources materials are found during construction activities. Impacts would be less than significant.</p>	<p>Applicable PVCCSP Mitigation Measure</p> <p>Additional Project-Level Mitigation Measure</p> <p>MM 5-1 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 within the Project area or within the off-site Project improvement areas for the identification of any previously unknown archaeological and/or cultural resources. Selection of the archaeologist shall be subject to the approval of the City of Perris Director of Development Services and no ground-disturbing activities shall occur within the Project area or within the off-site Project improvement areas until the archaeologist has been approved by the City.</p> <p>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.</p> <p>The project proponent/developer shall also enter into an agreement with either the Soboba Band of Luiseño Indians or the Pechanga Band of Luiseño Indians for a Luiseño tribal representative (observer/monitor) to work along with the consulting archaeologist. This tribal 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 tribal 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 tribal representative(s)</p>	<p>Less Than Significant</p>

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Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
	<p>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.</p> <p>The agreement between the proponent/developer and the Luiseño tribe shall include, but not be limited to:</p> <ul style="list-style-type: none"> • An agreement that artifacts will be reburied on-site and in an area of permanent protection; • Reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist; • Native American artifacts that cannot be avoided or relocated at the project site shall be prepared for curation at an accredited curation facility in Riverside County that meets federal standards (per 36 CFR Part 79) and available to archaeologists/researchers for further study; and • The project archaeologist shall deliver the Native American artifacts, including title, to the identified curation facility within a reasonable amount of time, along with applicable fees for permanent curation. <p>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.</p> <p>In the event that archaeological resources are discovered within the Project area 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.</p> <p>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</p>	

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	<p>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 undertaken in a manner that avoids destruction or other adverse impacts.</p> <p>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.</p> <p>Once grading activities have ceased and/or the archaeologist, in consultation with the designated Luiseño tribal representative, determines that monitoring is no longer necessary, monitoring activities can be discontinued following notification to the City of Perris Planning Division.</p> <p>A report of findings, including an itemized inventory of artifacts, shall be prepared upon completion of the tasks outlined above. The report shall include all data outlined by the Office of Historic Preservation guidelines, including a conclusion of the significance of all recovered, relocated, and reburied artifacts. A copy of the report shall also be filed with the City of Perris Planning Division, the University of California, Riverside, Eastern Information Center (EIC) and the Luiseño tribe(s) involved with the project.</p>	
4.6 ENERGY		
<i>Less Than Significant Impacts</i>		
<p>Result in wasteful, inefficient, or unnecessary consumption of energy or wasteful use of energy resources.</p> <p>The Project would consume energy during construction and operation, including from construction equipment, construction vendor and employee use of fuel, transportation during operation, and building operations. Project construction and operations would not result in the inefficient, wasteful or unnecessary consumption of energy. Additionally, the Project would implement MM Air 19 and</p>	<p><i>Applicable PVCCSP Mitigation Measures</i></p> <p>Previously referenced mitigation measure MM Air 19 and MM Air 20.</p>	<p>Less Than Significant</p>

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Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
MM Air 20, which would lessen the Project's energy use.		
<p>Conflicts with a State or local plan for renewable energy or energy efficiency. The Project would not conflict with State or local plans for renewable energy or energy efficient. The Project would be subject to applicable PVCCSP EIR mitigation measures that would serve to reduce the Project's level of energy consumption, and would be implemented in compliance with current California Building Code requirements, including the 2019 Building and Energy Efficiency Standards. No impact would result.</p>	<p>Applicable PVCCSP Mitigation Measures Previously referenced mitigation measures MM Air 19 and MM Air 20.</p>	No Impact
4.7 GEOLOGY AND SOILS		
Less Than Significant Impacts		
<p>Result in direct or indirect effects due to the rupture of a known earthquake fault. The PVCCSP Area, including the Project area, is not within an Alquist-Priolo Earthquake Fault Zone and there are no other faults in the vicinity. No impacts would occur.</p>	No mitigation is required.	No Impact
<p>Result in direct or indirect effects due to strong seismic ground shaking. The Project area is in a seismically active region of Southern California and would be subject to strong ground shaking. The Project would be required to implement the site-specific recommendations included in the Project-specific Geotechnical Investigation. Additionally, the Project would be required to comply with the guidelines and parameters within the PVCCSP EIR and City of Perris</p>	<p>Applicable PVCCSP Mitigation Measures 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.</p>	Less Than Significant

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
Municipal Code. Impacts would be less than significant.		
<p>Result in direct or indirect effects due to seismic-related ground failure, including liquefaction. The Project would be designed and constructed in accordance with all final Geotechnical Investigation recommendations and the Geotechnical Investigation shall be reviewed and approved by the City Engineer. With adherence to the City's General Plan policies, compliance with the CBC and City of Perris Building Code, mandatory compliance with the recommendations of the final Geotechnical Investigations related to design and construction, and incorporation of MM Geo 1, the Project would not directly or indirectly expose people or structures to substantial adverse effects, including loss, injury or death from seismic-related ground failure, including liquefaction. This impact would be less than significant.</p>	<p>Applicable PVCCSP Mitigation Measures Previously referenced mitigation measure MM Geo 1.</p>	Less Than Significant
<p>Result in direct or indirect effects due to landslides. The Project area is relatively flat and not located near any areas that possess potential landslide characteristics. No impacts would occur.</p>	No mitigation is required.	No Impact
<p>Soil erosion or loss of topsoil. Construction and operation of the Project would occur in compliance with applicable regulations that address water and soil erosion. This includes but is not limited to compliance with SCAQMD requirements to minimize fugitive dust (Rule 403), obtaining a National Pollutant Discharge Elimination System (NPDES) permit for construction activities, and</p>	No mitigation is required.	Less Than Significant.

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
implementing best management practices outlined in the required Project-specific Storm Water Pollution Prevention Plan (SWPPP), and Water Quality Management Plan (WQMP). Impacts would be less than significant.		
Unstable geologic unit or soil. The Project area includes soils potentially subject to settlement and shrinkage/subsidence. With adherence to City General Plan measures, the recommendations of the final Geotechnical Investigations, and MM Geo 1, impacts related to location on an unstable geologic unit or soil would be less than significant.	Applicable PVCCSP Mitigation Measures Previously referenced mitigation measure MM Geo 1.	Less Than Significant
Table 18-I-B expansive soil. The Rider 2 site and Rider Street bridge area possess a low to medium soil expansion potential, and the Rider 4 site possesses a low soil expansion potential. With adherence to the City General Plan measures, the recommendations of the final Geotechnical Investigations, and MM Geo 1, impacts related to expansive soils would be less than significant.	Applicable PVCCSP Mitigation Measures Previously referenced mitigation measure MM Geo 1.	Less Than Significant
Septic tanks or alternative waste water disposal systems. The Project would connect to an existing municipal sewer line and does not include any alternative waste water disposal systems or septic tanks. No impacts would occur.	No mitigation is required.	No Impact
Paleontological resources. No paleontological resources have been identified within the vicinity of the Project area; however, the very old Pleistocene alluvial fan deposits that directly underlie the younger alluvial valley sediments	Additional Project-Level Mitigation Measures MM 7-1 Prior to the issuance of grading permits, the Project Applicant 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 monitor representative) to be present	Less Than Significant

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Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>have a high potential to contain significant nonrenewable paleontological resources. Deeper ground-disturbing activities associated with construction have the potential to encounter previously unknown unique paleontological resources. Implementation of MM 7-1, which, is an updated version of PVCCSP EIR mitigation measure MM Cult 5 is incorporated into the Project, and would ensure that potential impacts to paleontological resources, if present, are less than significant.</p>	<p>on-site during any project-related excavations that exceed three (3) feet below the pre-grade surface. Selection of the paleontologist shall be subject to approval of the City of Perris Planning Manager and no grading activities shall occur at the site or within the off-site Project improvement areas until the paleontologist has been approved by the City.</p> <p>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.</p> <p>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.</p> <p>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.</p>	
<p>4.8 GREENHOUSE GAS EMISSIONS</p>		
<p>Potentially Significant Impacts</p>		
<p>Generate greenhouse gas emissions. The total annual estimated GHG emissions (construction and operation) for the Project would be greater than the SCAQMD threshold of for industrial projects, resulting in a cumulatively considerable and significant impact. Even with implementation of the identified mitigation measures, this impact would be significant and unavoidable.</p>	<p>Applicable PVCCSP Mitigation Measures</p> <p>Previously referenced mitigation measures MM Air 11, MM Air 13, MM 14, MM Air 19, and MM Air 20.</p> <p>Additional Project-Level Mitigation Measures</p> <p>Previously referenced mitigation measures MM 3-1 through MM 3-14.</p>	<p>Significant and Unavoidable Cumulative Impact</p>
<p>Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>greenhouse gases. The Project is consistent with the City's Climate Action Plan (CAP) and this impact is less than significant.</p>		
<p>4.9 HAZARDS AND HAZARDOUS MATERIALS</p>		
<p><i>Less Than Significant Impacts</i></p>		
<p>Create hazard through the routine transport, use, or disposal of hazardous materials. The Project's construction activities would pose a standard risk that is present on all construction sites. During the Project's construction phase, the Project's construction contractors would be required to comply with all applicable federal, State, and local laws and regulations related to the transport, handling, and use of hazardous materials. Impacts would be less than significant.</p> <p>Project operations have the potential to use common hazardous materials; however, the amount of materials that would be handled at any one time would be relatively small. With compliance with applicable regulations, operation of 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.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>Create hazard through reasonably foreseeable upset and accident conditions. There are no recognized environmental conditions, controlled recognized environmental conditions, or historical recognized environmental conditions. The residual concentrations of organochlorine pesticides (OCPs) and concentrations of arsenic from previous agricultural activities would not pose a significant human health risk. Further, implementation of MM Haz 7 would ensure impacts associated with contaminated soils, should it be encountered during construction, would be less than significant. With adherence to applicable State and local regulations related to the handling, transport, and usage of hazardous materials during construction and operation, impacts would be less than significant.</p>	<p>Applicable PVCCSP Mitigation Measures</p> <p>MM Haz 7 Prior to any excavation or soil removal action on a known contaminated site, or if contaminated soil or groundwater (i.e., with a visible sheen or detectable odor) is encountered, complete characterization of the soil and/or groundwater shall be conducted. Appropriate sampling shall be conducted prior to disposal of the excavated soil. If the soil is contaminated, it shall be properly disposed of, according to Land Disposal restrictions. If site remediation involves the removal of contamination, then contaminated material will need to be transported off site to a licensed hazardous waste disposal facility. If any implementing development projects require imported soils, proper sampling shall be conducted to make sure that the imported soil is free of contamination.</p>	<p>Less Than Significant</p>
<p>Emit hazards within 1-quarter mile of an existing or proposed school. There are no existing or proposed schools within 0.25 mile of the Project area and no schools are located along the proposed truck routes that would be utilized by the Project truck traffic. No impact would occur.</p>	<p>No mitigation is required.</p>	<p>No Impact</p>
<p>Be located on a list of hazardous materials sites. The Project area is not included on any list of hazardous materials sites. No impacts would occur.</p>	<p>No mitigation is required.</p>	<p>No Impact</p>
<p>Safety hazard or excessive noise related to airport uses. The Project area is located near the MARB/IP Airport and is within the AIA and the City's Airport Overlay Zone. The Project would not expose people working at the building</p>	<p>Applicable PVCCSP Mitigation Measures</p> <p>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.</p>	<p>Less Than Significant</p>

Table 1-1 Summary of Environmental Impacts for the Proposed Project

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<p>sites to excessive noise levels from airport operations. The Rider 4 building site is completely within Compatibility Zone D (Flight Corridor Buffer). There are no land use restrictions in this zone, no restrictions on the intensity of people at the site, and no open land requirement. The western portion of the Rider 2 site is within Compatibility Zone C1 (Primary Approach/Departure Zone) and the eastern portion of the Rider 2 site is within Compatibility Zone D. The anticipated occupancy of the Rider 2 building would not exceed land use intensity levels allowed in Compatibility Zone C1. Further, the Project incorporates MM Haz 2 through MM Haz 6, which reflect the PVCCSP Standards and Guidelines addressing MARB/IP Airport requirements outlined in the ALUCP, including these hazards to flight. Therefore, the Project would not result in a safety hazard for people residing or excessive noise for people working in the Project area. Accordingly, impacts would be less than significant.</p>	<p>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.</p> <p>MM Haz 4 The following notice shall be provided to all potential purchasers and tenants:</p> <p>“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)”</p> <p>MM Haz 5 The following uses shall be prohibited:</p> <ul style="list-style-type: none"> (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. <p>MM Haz 6 A minimum of 45 days prior to submittal of an application for a building permit for an implementing development project, the implementing development project applicant shall consult with the City of Perris Planning Department in order to determine whether any implementing project-related vertical structures or construction equipment will encroach into the 100-to-1 imaginary surface surrounding the MARB. If it is determined that there will be an encroachment into the 100-to-1 imaginary surface, the implementing development project applicant shall file a FAA Form 7460-1, Notice of</p>	

Table 1-1 Summary of Environmental Impacts for the Proposed Project

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	Proposed Construction or Alteration. If FAA determines that the implementing development project would potentially be an obstruction unless reduced to a specified height, the implementing development project applicant and the Perris Planning Division will work with FAA to resolve any adverse effects on aeronautical operations.	
<p>Impair or interfere with an emergency response or evacuation plan. With implementation of proposed roadway and access improvements, the Project would maintain and improve emergency access. During construction there may be temporary lane and roadway closures; however, PVCCSP MM Air 2 requires preparation of traffic control plan. Additionally, there are effective detour routes to maintain east-west travel if Rider Street is closed for any period of time to accommodate construction of the Rider Street bridge replacement over the PVSD Channel. Impacts to emergency response or evacuation would be less than significant.</p>	<p>Applicable PVCCSP Mitigation Measures Previously referenced mitigation measure MM Air 2.</p>	Less than Significant
<p>Expose people or structures to wildland fires. The Project area is not within or in proximity to any wildlands and is not within a high fire hazard severity zone. No impacts would occur</p>	No mitigation is required.	No Impact
4.10 HYDROLOGY AND WATER QUALITY		
Less Than Significant Impacts		
<p>Violate water quality standards, alter drainage patterns resulting in substantial erosion or siltation onsite or offsite, or otherwise degrade water quality. <i>Construction.</i> The construction-phase BMPs would ensure effective control of sediment discharge and pollutants associated with sediments.</p>	<p>Applicable Standard Regulatory Requirements RR 10-1 Prior to grading plan approval and the issuance of a grading permit for the Rider 2 and Rider 4 developments and the PVSD Channel improvements, the Project proponent shall provide evidence to the City that a Notice of Intent (NOI) has been filed with the Regional Water Quality Control Board for coverage under the State National Pollutant Discharge Elimination System (NPDES) General Construction Permit for discharge of storm water associated with construction activities.</p>	Less Than Significant

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>Implementation of regulatory requirements RR 10-1 through RR 10-3 would reduce short-term construction-related water quality impacts to less than significant levels.</p> <p><i>Operational.</i> By complying with the NPDES permit and WQMP requirements (refer to RR 10-4) and by incorporating Standards and Guidelines from the PVCCSP related to water quality, the Project would not provide substantial additional sources of polluted runoff to receiving waters. Long-term water quality impacts would be less than significant.</p> <p><i>Groundwater Impacts.</i> Groundwater is located at depths between 33 and 34 feet. The Project's excavation activities are not anticipated to reach groundwater depths. Nonetheless, the Project would comply with regulatory requirements (refer to RR 10-1 through RR 10-3) and implement the requirements of the WQMP (refer to RR 10-4), which would ensure that the Project's impacts on groundwater quality would be less than significant.</p>	<p>RR 10-2 Prior to grading plan approval and the first issuance of a grading permit by the City for the Rider 2 and Rider 4 developments and the PVSD Channel improvements, the Project proponent shall submit to the City of Perris a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP shall include a surface water control plan and erosion-control plan citing specific measures to control on- and off-site erosion during the entire grading and construction period. Additionally, the SWPPP shall identify structural and non-structural Best Management Practices (BMPs) to control sediment and nonvisible discharges from the site. BMPs to be implemented in the SWPPP may include (but shall not be limited to) the following:</p> <ul style="list-style-type: none"> ▪ Sediment discharges from the site may be controlled by the following: sandbags; silt fences; straw wattles and temporary debris basins (if deemed necessary); and other discharge control devices. The construction and condition of the BMPs will be periodically inspected during construction, and repairs will be made when necessary as required by the SWPPP. ▪ No materials of any kind shall be placed in drainage ways. ▪ Materials that could contribute nonvisible pollutants to storm water must be contained, elevated, and placed in temporary storage containment areas. ▪ All loose piles of soil, silt, clay, sand, debris, and other earthen material shall be protected per RWQCB standards to eliminate any discharge from the site. Stockpiles will be surrounded by silt fences. ▪ The SWPPP will include inspection forms for routine monitoring of the site during the construction phase to ensure NPDES compliance. ▪ Additional BMPs and erosion-control measures will be documented in the SWPPP and utilized if necessary. ▪ The SWPPP will be kept on site for the entire duration of project construction and will also be available to the local RWQCB for inspection at any time. <p>In the event that it is not feasible to implement the above BMPs, the City of Perris can make a determination that other BMPs will provide equivalent or superior treatment either on or off site.</p>	

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Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
	<p>RR 10-3 Prior to issuance of grading permits for the Rider 2 and Rider 4 developments and the PVSD Channel improvements, the Project proponent shall provide evidence to the City that the following provisions have been added to construction contracts for the Project:</p> <p>The Construction Contractor shall be responsible for performing and documenting the application of BMPs identified in the SWPPP. Weekly inspections shall be performed on sediment-control measures called for in the SWPPP. Monthly reports shall be maintained by the Contractor and submitted to the City for inspection. In addition, the Contractor will also be required to maintain an inspection log and have the log on site to be reviewed by the City of Perris and the representatives of the Regional Water Quality Control Board.</p> <p>RR 10-4 Prior to grading plan approval and issuance of a grading permit by the City for the Rider 2 and Rider 4 developments, the Project proponent shall receive approval from the City of Perris for a Final Water Quality Management Plan (Final WQMP). The Final WQMP shall specifically identify pollution-prevention, site-design, source-control, and treatment-control BMPs that shall be used on site to control predictable pollutant runoff in order to reduce impacts to water quality to the maximum extent practicable. Source control BMPs to be implemented in the Final WQMP may include (but shall not be limited to) those listed in Table 4.10-3. Treatment-control BMPs shall include on-site detention/sand filtration basins to treat the site's runoff; these facilities shall be maintained and inspected at least twice per year and prior to October 1. Additional BMPs will be documented in the WQMP and utilized if necessary. In the event that it is not feasible to implement the BMPs identified in the Final WQMP, the City of Perris can make a determination that other BMPs shall provide equivalent or superior treatment either on or off site.</p>	
<p>Substantially decrease groundwater supplies or interfere with groundwater recharge such that the project would impede sustainable groundwater management of the basin. Potable water would be provided to the Project by the EMWD. The Project's proposed use would not include the use of groundwater and would not include the installation of a groundwater well. The Project area is not within a recharge area for the basin. Impacts would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>

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Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>Alter the existing drainage pattern resulting in substantial erosion or siltation on- or off-site; increasing the amount rate or amount of surface runoff that would result in on- or off-site flooding; resulting in runoff that would exceed the capacity of stormwater drainage systems or the impediment or redirection of flood flows. The Project would increase the amount of impervious surface coverage on-site; however, the Project area's drainage pattern would be similar to existing conditions as flows would continue to discharge into the PVSD Channel.</p> <p>The proposed storm drain improvements, including PVSD Channel improvements, would provide adequate capacity to handle the storm water runoff from the Project site area and would not exceed the capacity of existing or planned storm water drainage systems. Additionally, the Project would implement short- and long-term water quality controls (i.e., BMPs) consistent with applicable regulatory requirements and would not result in substantial erosion or siltation on- or off-site during both construction and operation or provide substantial additional sources of polluted runoff. Implementation of the Project would result in less than significant impacts.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p>Risk of the release of pollutants due to project inundation. The Project area would not be susceptible to inundation from a tsunami or seiche condition.</p>	<p>Additional Project-Level Mitigation Measures</p> <p>MM 10-1 Prior to the issuance of a grading permit for structures located within the 100-year floodplain (as shown on the applicable FEMA Flood Insurance Rate Map [FIRM]), the</p>	<p>Less Than Significant</p>

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Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>Although the Project area is within the dam inundation zone for the Perris Dam, occurrence of flooding is extremely remote, as Perris Dam has been engineered and constructed and is being retrofitted with the knowledge that the area is seismically active. Due to the unlikely possibility of dam failure, potential for flooding resulting from the failure of a dam is low.</p> <p>The Project area is within a flood hazard area; however, proposed improvements to the PVSD Channel that would be implemented as part of the Project and the building site elevations would be raised through the placement of soil excavated from the Channel onto the building sites. This would protect the buildings sites during a 100-year storm event and ensure that the Project does not have the potential to result in flooding on- or offsite nor impede or redirect flood flows. However, because the Rider 2 and Rider 4 building sites are currently located in a designated flood hazard area, a CLOMR and LOMR from FEMA are required (refer to MM 10-1 and MM 10-2).</p> <p>The Project would have a less than significant related to the release of pollutants due to project inundation.</p>	<p>Project Applicant shall provide evidence to the City of Perris that a Conditional Letter of Map Revision (CLOMR) has been issued by FEMA for the Project.</p> <p>MM 10-2 Prior to the inspection for occupancy for structures located within the 100-year floodplain (as shown on the applicable FEMA FIRM), the Project Applicant shall provide evidence to the City of Perris that a Final Letter of Map Revision (LOMR) has been issued by FEMA verifying that flood control measures have been completed and the proposed structures are permanently removed from the FEMA 100-year floodplain. The pad elevation shall be a minimum one-foot above the 100-year flood plain elevation as identified on the applicable FEMA FIRM.</p>	
<p>Conflict or obstruct a water quality control plan or sustainable groundwater management plan. The Project's construction and operational activities would be required to comply with the Santa Ana RWQCB's Santa Ana</p>	<p>No mitigation is required.</p>	<p>No Impacts</p>

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<p>River Basin Water Control Plan. Compliance with the Basin Plan would ensure no conflicts would occur. No impacts would occur.</p> <p>The Project area is within a “high-priority” basin and, therefore, be required to comply with the Groundwater Sustainability Plan drafter for the basin. A Groundwater Sustainability Plan for the basin has not been adopted. Nonetheless, the Project would not conflict with the plan because the Project’s proposed operations would not include the use of groundwater and the Project area is not within a groundwater recharge area. The Project would not conflict with an adopted Groundwater Sustainability Plan. No impacts would occur.</p>		
<p>4.11 LAND USE AND PLANNING</p>		
<p><i>Less Than Significant Impacts</i></p>		
<p>Physically divide an established community. The Project area is vacant and undeveloped, except for the eastern portion that contains a portion of the PVSD Channel. Implementation of the Project, which is consistent with the planned land uses identified in the PVCCSP would not physically divide an established community. No impact would result.</p>	<p>No mitigation is required.</p>	<p>No Impact</p>
<p>Conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The Project implements the PVCCSP and is consistent with the Light Industrial land</p>	<p>No mitigation is required.</p>	<p>No Impact</p>

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Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>use designation for the Project are. The Project would not conflict with any applicable local or regional land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect. No impact would result.</p>		
<p>4.12 NOISE</p>		
<p>Less than Significant Impacts</p>		
<p>Substantial temporary or Permanent increase in ambient noise levels in excess of established standards. <i>On-Site Operational Noise Sources.</i> On-site operations sources would not exceed the established noise standards and the impact would be less than significant.</p>	<p>No mitigation is required.</p>	<p>On-site Operations: Less Than Significant</p>
<p>Excessive groundborne vibration or groundborne noise levels. Project construction and operations would not result in vibration levels that exceed the established thresholds of significance and the impact would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less than Significant</p>
<p>Exposure to excessive noise levels from airport operations. The Project area is within the 55 and 60 dBA CNEL contours for the MARB/IP Airport. The Project would not expose people working at the Project area to excessive noise levels from airport operations and this impact would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less than Significant</p>
<p>Potentially Significant Impacts</p>		
<p>Substantial permanent or temporary increase in ambient noise levels in excess of established standards.</p>	<p>Applicable PVCCSP Mitigation Measures MM Noise 1 During all project site excavation and grading on site, the construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and</p>	<p>Construction: Less Than Significant</p>

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<p><i>Construction.</i> Even with implementation of PVCCSP EIR MM Noise 1 though MM Noise 4, construction-related noise levels at two sensitive receivers would exceed the City's construction noise standards resulting in a potentially significant impact. Implementation of Project-level mitigation measure MM 12-1 would reduce this impact to a less than significant level.</p> <p><i>Off-Site Traffic Noise.</i> Off-site Project-generated traffic noise would exceed the established threshold of significance along one roadway segment with trucks using only the Harley Knox Boulevard/I-215 interchange under Existing Plus Project and Cumulative traffic conditions. With truck use of only the Placentia Avenue/I-215 interchange off-site Project-generated traffic noise would be significant along one roadway segment under Existing Plus Project conditions, and two roadway segments under Cumulative conditions. There is no feasible mitigation for these impacts.</p>	<p>maintained mufflers consistent with manufacturer's standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site.</p> <p>MM Noise 2 During construction, stationary construction equipment, stockpiling and vehicle staging areas would be placed a minimum of 446 feet away from the closest sensitive receptor.</p> <p>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.</p> <p>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.</p> <p>Additional Project-level Mitigation Measure</p> <p>MM 12-1 Prior to the issuance of each grading permit, the Property Owner/Developer shall provide evidence to the City that the Contractor Specifications require that a minimum 100-foot buffer zone be provided to separate large construction equipment (e.g. dozers, graders, scrapers, etc.) from receiver locations R2 (Morgan Park) and R7 (residential property line at 475 E Rider Street).</p>	<p>Off-site Traffic Noise: Significant and Unavoidable (Project and Cumulative)</p>
<p>4.13 Transportation</p>		
<p>Less Than Significant Impacts</p>		
<p>Conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Project, which incorporates applicable PVCCSP EIR MMs related to transportation and circulation, would not conflict with applicable plans, ordinances or policies addressing the circulation system, including: SCAG's 2016 RTP/SCS, Connect SoCal, the Riverside</p>	<p>Additional Project-Level Mitigation Measures</p> <p>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 includes the NPRBBD (North Perris Road and Bridge Benefit District). The fees shall be collected and utilized as needed by the City of Perris to construct the improvements necessary to maintain the required level of service and build or improve roads to their build-out level.</p> <p>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</p>	<p>No impact.</p>

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<p>County Congestion Management Plan, the City of Perris General Plan, the PVCCSP, and applicable fee mitigation programs. No impact would result.</p>	<p>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 will 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.</p> <p>MM Trans 5 Bike racks shall be installed in all parking lots in compliance with City of Perris standards.</p> <p>MM Trans 6 Each implementing development project that is located adjacent to the MWD Trail shall coordinate with the City of Perris Parks and Recreation Department to determine the development plan for the trail.</p> <p>MM Trans 8 Proposed mitigation measures resulting from project-level traffic impact studies shall be coordinated with the NPRBBD to ensure that they are in conformance with the ultimate improvements planned by the NPRBBD. The applicant shall be eligible to receive proportional credits against the NPRBBD for construction of project level mitigation that is included in the NPRBBD.</p>	
<p>Be inconsistent or conflict with CEQA Guidelines Section 15064.3 subdivision (b). The Project is within a Low Vehicle Miles Traveled (VMT) area, with a VMT per employee that is less than the Citywide average. Impacts would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p>Increase hazards due to a design feature. The presence of construction equipment, narrowing of traffic lanes and the occasional interruption of traffic flow on streets associated with Project-related construction activities could pose hazards to vehicular traffic due to localized traffic congestion, decreased turning radii, or the condition of roadway surfaces. However, the Project</p>	<p>Applicable PVCCSP Mitigation Measures</p> <p>Previously referenced mitigation measures MM Air 2.</p> <p>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.</p>	<p>Less Than Significant</p>

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<p>incorporates MM Air 2, which requires implementation of a Traffic Control Plan. Impacts would be less than significant.</p> <p>Roadway and circulation improvements have been designed in compliance with Standards and Guidelines set forth in the PVCCSP. Additionally, the Project MM Trans 1 and MM Trans 2, and PDF 13-1 through PDF 13-3. With the incorporation of these mitigation measures and PDFs into the Project, this impact would be less than significant.</p>	<p>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.</p> <p>Project Design Features</p> <p>PDF 13-1 Prior to the issuance of occupancy permits, the Project proponent shall have constructed the roadway improvements outlined below. These roadways shall be improved consistent with the PVCCSP and the City of Perris General Plan's Circulation Element. The Project shall improve these roadways as required by the final Conditions of Approval for the proposed Project and applicable City of Perris standards</p> <ul style="list-style-type: none"> • Construct Redlands Avenue to its ultimate half-section width as a Secondary Arterial (94-foot right-of-way) between Morgan Street and Rider Street. • Construct Rider Street to its ultimate half-section width as a Secondary Arterial (94-foot right-of-way) between Redlands Avenue and the Project's eastern boundary • Construct Morgan Street at the half-section width for a Local Street (60-foot right-of-way) between Redlands Avenue and the Project's eastern boundary. A cul-de-sac shall be constructed at the eastern end of Morgan Street. <p>PDF 13-2 Prior to the issuance of occupancy permits, the Project proponent shall have constructed the site adjacent access improvements outlined below, consistent with the PVCCSP and the City of Perris General Plan's Circulation Element. The proposed Project shall improve these roadways as required by the final Conditions of Approval for the proposed Project and applicable City of Perris standards</p> <ul style="list-style-type: none"> • Redlands Avenue & Morgan Street. Install a stop control on the westbound approach and construct the intersection with the following geometrics: <ul style="list-style-type: none"> ○ Northbound Approach (Redlands Avenue): One left turn lane with a minimum of 100 feet of storage and one shared through-right turn lane. ○ Southbound Approach (Redlands Avenue): One left turn lane with a minimum of 100 feet of storage and one shared through-right turn lane. ○ Eastbound Approach (Morgan Street): One left turn lane with 100 feet of storage and one shared through-right turn lane. 	

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	<ul style="list-style-type: none"> ○ Westbound Approach (Morgan Street): One shared left-through-right turn lane. <p>There are two other full access driveways proposed along Morgan Street (Driveway A and Driveway B). Both Driveway A and Driveway B shall have a stop control on the driveway (minor approach) with free flow along Morgan Street. Each approach shall accommodate a single lane in each direction to facilitate site access.</p> <ul style="list-style-type: none"> • Redlands Avenue & Driveway 1. Install a stop control on the westbound approach and construct the intersection with the following geometrics: <ul style="list-style-type: none"> ○ Northbound Approach (Redlands Avenue): One through lane and one shared through-right turn lane. ○ Southbound Approach (Redlands Avenue): One through lane. ○ Westbound Approach (Driveway 1): One right turn lane. • Redlands Avenue & Sinclair Street. Install a stop control on the eastbound and westbound approaches and construct the intersection with the following geometrics: <ul style="list-style-type: none"> ○ Northbound Approach (Redlands Avenue): One through lane, and one shared through-right turn lane. ○ Southbound Approach (Redlands Avenue): One left turn lane with a minimum of 100 feet of storage and one shared through-right turn lane. ○ Eastbound Approach (Sinclair Street): One shared left-through-right turn lane. ○ Westbound Approach (Sinclair Street): One right turn lane. • Redlands Avenue & Driveway 2. Install a stop control on the westbound approach and construct the intersection with the following geometrics: <ul style="list-style-type: none"> ○ Northbound Approach (Redlands Avenue): One through lane and one shared through-right turn lane. ○ Southbound Approach (Redlands Avenue): One left turn lane with a minimum of 100 feet of storage and one through lane. ○ Westbound Approach (Driveway 2): One shared left-right turn lane. • Redlands Avenue & Driveway 3. Install a stop control on the westbound approach and construct the intersection with the following geometrics: 	

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
	<ul style="list-style-type: none"> ○ Northbound Approach (Redlands Avenue): One through lane and one shared through-right turn lane. ○ Southbound Approach (Redlands Avenue): One through lane. ○ Westbound Approach (Driveway 3): One right turn lane. <ul style="list-style-type: none"> ● Redlands Avenue & Rider Street. Install a traffic signal and construct the intersection with the following geometrics: <ul style="list-style-type: none"> ○ Northbound Approach (Redlands Avenue): One left turn lane with a minimum of 100 feet of storage and one shared through-right turn lane. ○ Southbound Approach (Redlands Avenue): One left turn lane with a minimum of 100 feet of storage and one shared through-right turn lane. ○ Eastbound Approach (Rider Street): One left turn lane with a minimum of 100 feet of storage, one through lane, and one right turn lane. ○ Westbound Approach (Rider Street): One left turn lane with a minimum of 100 feet of storage, one through lane, and one shared through-right turn lane. ● Driveway 4/Wilson Avenue & Rider Street. Install a traffic signal and construct the intersection with the following geometrics: <ul style="list-style-type: none"> ○ Northbound Approach: One shared left-through-right turn lane. ○ Southbound Approach (Driveway 4): One shared left-through-right turn lane. ○ Eastbound Approach (Rider Street): One left turn lane with a minimum of 100 feet of storage, one through lane, and one right turn lane. ○ Westbound Approach (Rider Street): One left turn lane with a minimum of 100 feet of storage, one through lane, and one shared through-right turn lane. <p>On-site traffic signing and striping should be implemented in conjunction with detailed construction plans for the Project area. Sight distance at each Project access point shall be reviewed with respect to City of Perris and PVCCSP sight distance standards at the time of preparation of final grading, landscape and street improvement plans.</p> <p>PDF 13-3 Prior to the issuance of occupancy permits, the Project proponent shall construct the truck access roadway improvements at the following driveways to provide the necessary curb radii to accommodate a truck with a 67-foot wheelbase (WB-67):</p>	

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
	<ul style="list-style-type: none"> • Morgan Street at Redlands Avenue shall provide a 70-foot radius on the northeast curb. • Driveway 1 at Redlands Avenue shall provide a 45-foot radius on the northeast curb. • Sinclair Street at Redlands Avenue shall provide a 60-foot radius on the northeast curb. • Driveway 2 at Redlands Avenue shall provide a 45-foot radius on the northeast curb. 	
Potentially Significant Impacts		
<p>Result in inadequate emergency access. Construction activities may temporarily restrict vehicular traffic flow; however, as required by MM Air 2, adequate measures to facilitate the passage of vehicles through/around any required lane or road closures would be implemented as part of the traffic control plan. Additionally, there are effective detour routes to maintain east-west travel if Rider Street is closed for any period of time to accommodate construction of the Rider Street bridge replacement over the PVSD Channel. Impacts to emergency access during construction would be less than significant.</p> <p>Implementation of the Project would result in roadway improvements that would be incorporated in accordance with the PVCCSP and would improve the ability of emergency vehicles to access the Project area and surrounding properties. Impacts would be less than significant.</p>	Refer to mitigation measures MM Air 2 and MM 9-1	Less Than Significant
4.14 TRIBAL CULTURAL RESOURCES		
Less Than Significant Impacts		
Change the significance of a listed or eligible for listing tribal cultural	No mitigation is required.	No Impact

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>resources. There are no tribal cultural resources eligible for listing or that are listed on the California Register of Historical Resources within the Project area. No impacts would occur.</p>		
<p>Potentially Significant Impacts</p>		
<p>Change the significance of a tribal cultural resource that is significant to a California Native American tribe. No cultural resources, including tribal cultural resources, were observed and no information was obtained through Native American Consultation indicating the presence of tribal cultural resources within the Project area. However, there is a remote possibility for unknown tribal cultural resources to be encountered during construction. The Project would incorporate Project-level mitigation (MM 5-1 and MM 5-2) to ensure potential impacts to tribal cultural resources would be less than significant.</p>	<p>Additional Project-Level Mitigation Measures Refer to mitigation measures MM 5-1 and MM 5-2 under Cultural Resources.</p>	
<p>4.15 UTILITIES AND SERVICE SYSTEMS</p>		
<p>Less Than Significant Impacts</p>		
<p>Environmental effects from installation of utility infrastructure. Project involves the installation of utility infrastructure to serve the proposed uses; utility lines would connect to existing facilities adjacent to the Rider 2 and Rider 4 sites. The environmental impacts associated with construction and installation of utility infrastructure is addressed for each topical issue and no additional impacts would result beyond those previously discussed.</p>	<p>No additional mitigation is required.</p>	<p>Less Than Significant</p>

Table 1-1 Summary of Environmental Impacts for the Proposed Project

Summary of Environmental Impacts	Project Design Features, Regulatory Requirements Applicable PVCCSP EIR Mitigation Measures, and Additional Project-Level Mitigation Measures	Level of Significance After Mitigation
<p>Wastewater treatment capacity. The Project is also within the anticipated wastewater generation for the PVCCSP and can be accommodated by existing and proposed wastewater facilities and can be adequately treated at the Perris Valley Regional Water Reclamation Facility. This impact would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p>Water supplies. The Project implements the PVCCSP and the estimated water demand was accounted for in the PVCCSP Water Supply Assessment (WSA). Additionally, based on the Project-specific WSA EMWD determined that it would be able to provide adequate water supplies to meet the potable water demands for the Project as part of its existing and future demands. Impacts would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p>Landfill capacity. The Project's estimated construction and operation generated solid waste would be well below the permitted daily tonnage at the Badlands and El Sobrante Landfills. Impacts would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>
<p>Federal, State, and local solid waste regulations. The Project would be implemented in compliance with mandatory federal, State, and local solid waste management and reduction regulations. Building operators would participate in the City's recycling programs and comply with hazardous waste disposal regulations. Impacts would be less than significant.</p>	<p>No mitigation is required.</p>	<p>Less Than Significant</p>

2.0 INTRODUCTION

2.1 PURPOSE OF THE EIR

This Draft Environmental Impact Report (EIR) has been prepared to evaluate the potential environmental impacts associated with the construction and operation of the proposed IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain (PVSD) Channel Improvements Project (Project). The Project involves two Class A high cube, non-refrigerated warehouse buildings and associated on-site parking and landscaping, and roadway and infrastructure improvements. Additionally, the Project involves the implementation of planned regional PVSD Channel improvements and replacement of the Rider Street bridge. The City of Perris is the lead agency under the California Environmental Quality Act (CEQA) and is responsible for preparing the EIR. The determination that the City of Perris is the “lead agency” is made in accordance with Sections 15051 and 15367 of the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines), which define the lead agency as the public agency that has the principal responsibility for carrying out or approving a project.

This Draft EIR is an informational document prepared by the City of Perris for the following purposes:

- To satisfy the requirements of CEQA (California Public Resources Code, Sections 21000–21178) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 14, Sections 15000–15387).
- To inform the general public, the local community, and responsible and interested public agencies of the scope of the Project and to describe the potential environmental effects, measures to mitigate significant effects, and alternatives to the Project.
- To enable the City to consider environmental consequences when deciding whether to approve the Project.
- To serve as a source document for responsible agencies to issue permits and approvals, as required, for development of the Project.

As described in CEQA and the State CEQA Guidelines, public agencies are charged with the duty of avoiding or substantially lessening significant environmental effects, where feasible. In satisfying this duty, a public agency has an obligation to balance the project’s significant effects on the environment with its benefits, including economic, social, technological, legal, and other benefits. The lead agency is required to consider the information in the EIR, along with any other relevant information, in making its decisions on the Project. Although the EIR does not determine the ultimate decision that will be made regarding approval of a project, CEQA requires the City to consider the information in the EIR and make findings regarding each significant and unavoidable effect identified in the EIR. The City will review and consider certification of the Final EIR prior to any decision on whether to approve the proposed Project.

This Draft EIR has been prepared utilizing information from City planning and environmental documents, technical studies prepared for the Project, and other publicly available data. As permitted under the State CEQA Guidelines (Section 15084[d–e]), this Draft EIR has been prepared by a consultant under the direction of professional City planning staff. However, prior to certification, the City must independently

review the methods and conclusions reached in the Draft EIR. The City is undertaking an independent review of this Draft EIR by having City planning staff work with the consultant on the EIR, and by employing a third-party consultant to independently review the EIR. If certified by the City, the information included in and the conclusions reached in the EIR will therefore represent the City's independent judgment regarding the potential environmental impacts of the Project.

2.2 TYPE OF EIR

The Perris Valley Commerce Center Specific Plan (PVCCSP) was adopted by the City of Perris on January 12, 2012 (Ordinance No. 1284), and has been subsequently amended. The Project area is within the PVCCSP area and is consistent with the land use and growth assumptions anticipated in the PVCCSP. 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 [SCH] No. 2009081086), which was certified by the City of Perris in January 2012. The PVCCSP EIR is a program EIR and was prepared in accordance with CEQA and the State CEQA Guidelines. Project-specific evaluation in a later-tier environmental document for individual development projects within the PVCCSP area was anticipated. As stated in Section 15168(d)(3) of the State CEQA Guidelines, the program EIR can “focus an EIR on a later activity to permit discussion solely of new effects which had not been considered before”. As such, the environmental analysis for the Project presented in this Draft EIR is based on, or “tiered” from, the analysis presented in the PVCCSP EIR, when applicable, and the PVCCSP EIR is incorporated by reference (refer to Section 2.4).

Section 15152 of the State CEQA Guidelines states, “Tiering refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on issues specific to the later project.” CEQA and the State CEQA Guidelines encourage the use of tiered environmental documents to eliminate repetitive discussions of the same issues.

The PVCCSP EIR analyzes the direct and indirect impacts resulting from implementation of the allowed development under the PVCCSP. Section 15152(f) of the State CEQA Guidelines instructs that, when tiering, a later EIR or Negative Declaration shall be prepared when the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. Significant environmental effects are considered to have been “adequately addressed” if the lead agency determines that:

- A. they have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or,
- B. they have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

Following review of the Project and the analysis presented in the PVCCSP EIR, the lead agency has determined that the Project is a “project” under CEQA that was not fully addressed in the PVCCSP EIR. Additional information regarding issues to be further evaluated in this Draft EIR is provided in Section 2.3, Scope of this EIR.

2.2.1 REVIEW OF AN EIR

The City of Perris—as lead agency for the Project—and other public agencies (i.e., responsible and trustee agencies) that may use the Final EIR in their decision making or permitting processes will consider the information in this EIR along with other information that may be presented during the CEQA process.

Upon certification of the Final EIR, the City of Perris will consider whether to approve the proposed IDI Ride 2 & 4 Warehouses and PVSD Channel Improvement Project. Where feasible mitigation measures are not available to reduce significant environmental impacts to a less than significant level, impacts are considered significant and unavoidable. Written Findings of Fact will be prepared for each significant adverse environmental effect identified in the Final EIR, as required by Section 15091 of the State CEQA Guidelines. If the City certifies a Final EIR for a project that has significant and unavoidable impacts, the City shall also state, in writing, the specific reasons for approving the project based on the Final EIR and any other information in the public record. This is called a “Statement of Overriding Considerations” and is used to explain the specific reasons that the benefits of a proposed project make its unavoidable environmental effects acceptable. The Statement of Overriding Considerations is adopted after the Final EIR is certified and before the action to approve the proposed project has been taken. Additionally, the City must adopt a Mitigation Monitoring and Reporting Program (MMRP) to ensure compliance with mitigation measures that have been incorporated into the Project to reduce or avoid significant effects on the environment during construction and/or implementation.

The actions that may be involved in implementing the Project are described in Section 3.7, Summary of Requested Actions, of this EIR. Other agencies that may have discretionary approval over the Project, or components thereof, including responsible and trustee agencies, are also listed in Section 3.7.

2.3 SCOPE OF THIS EIR

2.3.1 SCOPING PROCESS

In compliance with Section 15201 of the State CEQA Guidelines, the City of Perris has taken steps to provide opportunities for public participation in the initial environmental review process. A Notice of Preparation (NOP) was distributed by the City on October 16, 2019, to the State Clearinghouse and Planning Unit of the Governor’s Office of Planning and Research (SCH) for transmittal to state agencies identified in the SCH letter included in Appendix A to this Draft EIR. The City also directly distributed the NOP to 49 federal, state, regional, and local government agencies and interested parties for a 30-day public review period to solicit comments and to inform agencies and the public of the Project. The NOP was also posted at the Riverside County Clerk’s office. The Project was described, potential environmental effects associated with Project implementation were identified, and agencies and the public were invited to review and comment on the NOP.

The City received 12 responses to the NOP. Table 2-1 provides a summary of the NOP responses and issues raised. A copy of the NOP and responses received are included in Appendix A to this Draft EIR.

Table 2-1 Notice of Preparation Comments Received

Agency	Date	Comments	Addressed in Section(s)
State Agencies			
California Office of Planning and Research, State Clearinghouse (SCH)	October 16, 2019	OPR acknowledged receipt of NOP and is confirming distribution of the NOP to State Agencies for review and comment.	NA
California Air Resources Board (CARB)	November 8, 2019	The CARB indicates that air pollution and health risks resulting from the Project, including cumulative health risks to sensitive receptors and construction-related health risks, should be evaluated in the EIR. The CARB requests that mechanisms be put in place to ensure that transportation refrigeration units (TRUs), which are not proposed, not be allowed in the future without subsequent environmental evaluation. Measures to reduce exposure of toxic diesel emissions in disadvantaged communities, emissions of oxides of nitrogen (NOx), and greenhouse gas (GHG) emissions are also recommended.	Section 4.3 Section 4.8
California Department of Conservation (DOC)	November 8, 2019	The DOC requests that analysis of Project and cumulative impacts related to agricultural land conversion be provided in the EIR, and that mitigation measures be identified for significant impacts.	Section 4.2
California Department of Forestry and Fire Protection (CalFire)	November 13, 2019	CalFire did not have comments on the scope of the EIR but requested that they be added to the distribution of the EIR for the Project.	NA
California Department of Toxic Substances Control (DTSC)	November 5, 2019	The DTSC recommends that the EIR address potential impacts resulting from historical agricultural use of the Project area and associated releases of agricultural-related chemicals in the soil.	Section 4.9
California Native American Heritage Commission (NAHC)	November 1, 2019	The NAHC summarizes requirements for Native American consultation pursuant to Senate Bill (SB) 18 and Assembly Bill (AB) 52, and provides standard guidance on the scope of the analysis of potential impacts to Native American resources and recommendations for mitigation.	Section 4.15
Regional Agencies			
March Joint Powers Authority	October 22, 2019	March Joint Powers Authority identifies that the Project is not located within the March Joint Powers Authority jurisdiction; no comments are provided.	NA

Agency	Date	Comments	Addressed in Section(s)
Riverside County Airport Land Use Commission (ALUC)	October 21, 2019	The ALUC confirms the Project site is within Zones C1 and D of the March Air Reserve Base/Inland Port Airport Influence Area and ALUC review for the Project is not required because the City's General Plan has been found consistent with the March Airport Land Use Compatibility Plan. City staff can perform the airport compatibility review.	Section 4.9 Section 4.11
Riverside Transit Agency (RTA)	October 30, 2019	The RTA requests confirmation that there are Americans with Disabilities (ADA)-compliant connected sidewalks along Rider Street and Redlands Avenue and a traffic signal at the intersection of these streets. Additionally, a bus stop at this intersection is requested.	Section 3.0 Section 4.14
South Coast Air Quality Management Quality (SCAQMD)	November 5, 2019	The SCAQMD provides recommendations on the scope of the air quality and health risk analysis for the Project, and truck trip generation rates to be used. The SCAQMD identifies that the EIR should include feasible mitigation measures to avoid or minimize the Project's significant air quality impacts, and that alternatives should be considered. The SCAQMD identifies that the EIR will be the basis for any permits to be issued by the SCAQMD and provides information on the availability of data sources to be used in the analysis.	Section 4.3 Section 4.8
Southern California Association of Governments (SCAG)	November 14, 2019	SCAG requests that the consistency of the Project with the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals be addressed. RTP/SCS strategies provide guidance for considering the project in the context of these goals. SCAG identifies that the most recently adopted growth forecasts should be used and recommends that the 2016 RTP/SCS Final Program EIR mitigation measures be used for guidance, as appropriate.	Section 4.11 Section 6.1
Organizations			
Rincon Band of Luiseño Indians	November 12, 2019	This letter requests that an archaeological record search be conducted with a copy of the results provided to the Rincon Band. The letter also requests that the tribe be notified of the Public Review Draft of the EIR.	Section 4.15

A Draft EIR public scoping meeting with the City of Perris Planning Commission was held at the Perris City Hall, City Council Chambers on November 6, 2019, at 6:00 PM. City staff described the Project to the Planning Commissioners and provided a conceptual site plan for the Project and architectural elevations. Following a brief explanation of the environmental review process by the EIR consultant, comments from the commissioners were solicited. There were no other agency representatives or individual members of the public in attendance. In summary, the Planning Commissioners brought up the following items they want to be addressed:

- Address Project and cumulative air quality and health risk impacts to sensitive receptors (e.g., residents and schools) from operations, including emissions from trucks, and identify mitigation measures for impacts.
- Address greenhouse gas emissions.
- Address traffic impacts and use truck routes that avoid travel by sensitive receptors.
- Avoid use of Perris Boulevard except to cross this street to get to the destination.
- Address potential impacts to adjacent residential uses.

2.3.2 EFFECTS FOUND NOT TO BE SIGNIFICANT

As identified in the NOP included in Appendix A of this EIR, the City of Perris concluded that the Project would have no impact or a less than significant impact related to mineral resources, population and housing, and wildfire, and that no further analysis of these topics is required in the EIR. Refer to Section 6.1, Effects Determined Not to be Significant, of this EIR for a discussion of these topical issues.

2.3.3 POTENTIALLY SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT ADDRESSED IN THIS EIR

The NOP and NOP comments received were used to establish the scope of the issues addressed in this EIR. The City of Perris identified that additional Project-level analysis was required to evaluate potential impacts associated with the implementation of the Project for the following environmental issue areas. Section 4.0 of this EIR provides the environmental analysis and outlines the mitigation program for each of the following topical issues.

- Aesthetics (Section 4.1)
- Agriculture and Forestry Resources (Section 4.2)
- Air Quality (Section 4.3)
- Biological Resources (Section 4.4)
- Cultural Resources (Section 4.5)
- Energy (Section 4.6)
- Geology and Soils (Section 4.7)
- Greenhouse Gas Emissions (Section 4.8)
- Hazards and Hazardous Materials (Section 4.9)
- Hydrology and Water Quality (Section 4.10)
- Land Use and Planning (Section 4.11)
- Noise (Section 4.12)
- Transportation (Section 4.13)
- Tribal Cultural Resources (Section 4.14)
- Utilities and Service Systems (Section 4.15)

2.4 INCORPORATION BY REFERENCE

In accordance with Section 15150 of the State CEQA Guidelines, an EIR may incorporate by reference all or portions of another document that is a part of public record or is generally available to the public. The previously prepared EIRs and environmental analyses listed below were relied upon or consulted in the preparation of this EIR, and are hereby incorporated by reference:

- *Perris Comprehensive General Plan 2030*, City of Perris, originally approved on April 26, 2005.
- *Perris General Plan 2030 Draft Environmental Impact Report* (SCH No. 2004031135), certified April 26, 2005.
- *Perris Valley Commerce Center Specific Plan*, adopted January 10, 2012 and subsequently amended.
- *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report* (SCH No. 2009081086), certified January 10, 2012.

These documents are available for review at the address provided in Section 2.5, below.

2.5 PUBLIC REVIEW OF THE DRAFT EIR

This Draft EIR is being circulated for review and comment to the public and other interested parties, agencies, and organizations. The comment period will begin on **September 30, 2020 and end on November 16, 2020**. During the review period, the Draft EIR will be available for review at the Planning Division building located at the address presented below. The Draft EIR will also be available on the City's website at <http://www.cityofperris.org/departments/development/planning.html>.

Written comments on the Draft EIR should be addressed to:

Mary Blais, Contract Planner
City of Perris Planning Division
135 North "D" Street
Perris, California 92570
mblais@cityofperris.org
(951) 943-5003 ext. 252

2.6 REFERENCES

City of Perris, 2004. *Draft Environmental Impact Report City of Perris General Plan 2030, State Clearinghouse #2004031135*. October 2004, certified April 26, 2005. Available at: http://www.cityofperris.org/city-hall/general-plan/General_Plan_2030.pdf

City of Perris, 2005. *Perris Comprehensive General Plan 2030*. Approved April 26, 2005. Available at <https://www.cityofperris.org/departments/development-services/general-plan>

City of Perris, 2011. *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report*. November 2011, certified January 10, 2012. Available at <https://www.cityofperris.org/Home/ShowDocument?id=2645>

City of Perris, 2018. *Perris Valley Commerce Center Amendment No. 9 Specific Plan*. Adopted January 10, 2012 and subsequently amended and approved August 28, 2018. Available at <https://www.cityofperris.org/Home/ShowDocument?id=2647>

3.0 PROJECT DESCRIPTION

3.1 INTRODUCTION

This section provides a brief background for the proposed IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain (PVSD) Channel Improvement Project (Project), followed by a description of the Project and its environmental setting, pursuant to Sections 15124 and 15125, respectively, of the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines). This includes a description of the Project location, geographic setting, environmental setting, Project objectives, Project components, and discretionary actions required to implement the Project. The Project description is used as the basis for analyzing the Project's impacts on the existing physical environment in Section 4.0 of this Draft Environmental Impact Report (EIR).

The Project is designed to implement the City's established land use vision, as set forth in the *Perris Valley Commerce Center Specific Plan (PVCCSP)* (City of Perris, 2018) and incorporates on- and off-site Design Standards and Guidelines, as described in this section.

3.2 PROJECT BACKGROUND

On January 10, 2012, the City of Perris City Council adopted the PVCCSP, which was prepared pursuant to the authority granted to the City by California Government Code, Title 7, Division 1, Chapter 3, Article 8, Sections 65450 to 65457. On the same date, the City also adopted Ordinance No. 1284, adopting Specific Plan Zoning for properties within the PVCCSP area. The PVCCSP land uses allow for the development of approximately 3,500 acres which consist of industrial, commercial, and office uses, as well as public facilities. The PVCCSP has been subsequently amended eight times, with Amendment No. 8 adopted in July 2018. In conjunction with its approval of the PVCCSP, the City complied with CEQA by preparing and certifying the *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (PVCCSP EIR)* (State Clearinghouse No. 2009081086) (City of Perris, 2011), which is incorporated by reference in this EIR and is available for public review at the City of Perris Planning Division, 135 North "D" Street, Perris, California 92570.

The proposed Rider 2 and Rider 4 high cube warehouse sites are within the larger Rider Logistics Center in the City of Perris. Construction of the Rider 1 and 3 warehouses is complete. Rider 1 was originally approved in 2007 (DPR 06-0365) and the building is 492,282 square feet (sf). Rider 3 was originally approved in 2009 (DPR 06-0432) and the building is 643,263 sf. It should also be noted that in 2008 development of a smaller warehouse was approved on the Rider 2 site (378,521 sf compared to the currently proposed 804,759 sf warehouse).

The Perris Valley Master Drainage Plan (PVMDP) was adopted by the Riverside County Flood Control & Water Conservation District (RCFC&WCD) in July 1987, was revised in June 1991, and addresses drainage infrastructure required for the 38-square-mile Perris Valley area (RCFC&WCD, 1991). The infrastructure plans associated with the PVCCSP involve modifications to the PVMDP. The Perris Valley Channel Master Drainage Plan (PVCMDP) was adopted in October 1989 and addresses drainage needs along the PVSD Channel, which flows to the San Jacinto River (RCFC&WCD, 1989). The PVCMDP serves as long-term guide to the design and construction of the ultimate channel, and identifies the sizing and location of local drainage facilities to be constructed by developers and others within the area. The

PVCCSP also anticipates the construction of other adopted PVMDP facilities to accommodate the 100-year storm flows in the area.

3.3 PROJECT LOCATION

The Project area is located in the southeast portion of the PVCCSP area, in the City of Perris, in Riverside County. The Project area, which collectively includes the Rider 2 site, the Rider 4 site, the PVSD Channel Improvement area (including the Rider Street bridge), and off-site improvements areas, encompasses approximately 99.2 acres (94.7 acres “on-site” and 4.5 acres “off-site”). The Project area is generally located north of Rider Street, east of Redlands Avenue, and south of Morgan Street; an approximately 3,490-foot segment of the PVSD Channel forms the eastern Project boundary. The Project area is located approximately 1.6 miles east of Interstate (I)-215, 0.5 mile south of Ramona Expressway, and approximately 7 miles south of State Route (SR)-60. Figure 3-1, *Regional and Local Vicinity Map*, depicts the regional location and local vicinity of the Project area. A description of the location for each Project component is provided below.

- **Rider 2 Warehouse Site.** The Rider 2 site¹ encompasses approximately 38.3 net acres² and is located south of the Colorado River Aqueduct (CRA) (the CRA is within Metropolitan Water District [MWD] property), north of Rider Street, east of Redlands Avenue, and west of the PVSD Channel.
- **Rider 4 Warehouse Site.** The Rider 4 site³ encompasses approximately 26.7 net acres⁴ and is south of Morgan Street, north of the MWD property, east of Redlands Avenue, and west of the PVSD Channel.
- **PVSD Channel Improvement Area.** The PVSD Channel improvement area⁵ encompasses 29.7 acres and extends along the PVSD Channel from an area approximately 100 feet north of Morgan Street to an area approximately 200 feet south of Rider Street, and includes the existing Rider Street bridge, which would be replaced with the Project. The PVSD Channel forms the eastern boundary of the Project area and the PVCCSP area.

3.4 ENVIRONMENTAL SETTING

The PVCCSP EIR was certified in January 2012 and provides a description of the environmental and regulatory setting for the entire PVCCSP area, which includes the Project area. With the exception of termination of agricultural activities in the Project area, and construction of development anticipated by the PVCCSP, including the Rider 1 and Rider 3 warehouse buildings, the physical setting for the Project area and adjacent areas, as described in the PVCCSP EIR, has not notably changed since the PVCCSP EIR was prepared and certified.

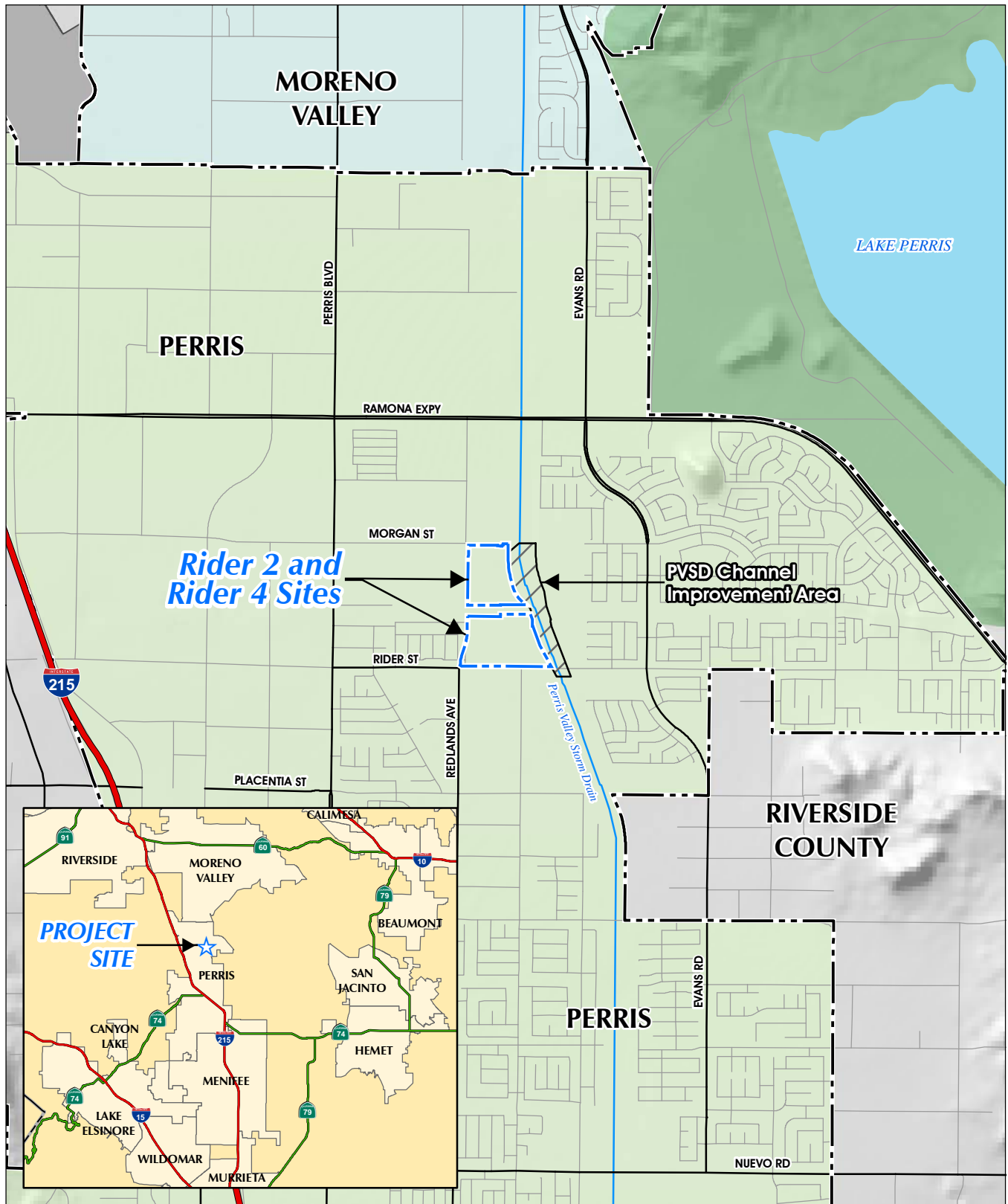
¹ Includes Assessor Parcel Numbers (APNs) 303-170-004, -005, -011 and -014.

² The Rider 2 site encompasses 39.05 gross acres. The Project includes vacation of 1.13 acres from the realignment of Redlands Avenue, dedication of 0.67 acres for public roadway right-of-way, and dedication of 1.22 acres for the PVSD Channel improvements.

³ Includes APNs 303-160-002, -003, -007, -009, and -010. APN 303-160-016 includes a parcel currently owned by the Eastern Municipal Water District.

⁴ The Rider 4 site encompasses 33.84 gross acres. The Project includes dedication of 2.62 acres for public roadway right-of-way, and dedication of 4.77 acres for the PVSD Channel improvement. The approximately 0.2-acre EMWD parcel is included in the impact boundary and net site area because IDI would be eventually acquiring the majority of this parcel as part of the site.

⁵ Includes APNs 303-160-008, and 303-170-016 and -017.



Source(s): Nearmap Imagery (2019), RCTLMA (2019)

Figure 3-1



Regional and Local Vicinity Map

Below is a brief description of the geographic setting for the area, and environmental setting for the Project area and the surrounding areas. Additional setting information is provided for each topical issue analyzed in Section 4.0 of this EIR. It should be noted that updates to applicable local and regional regulatory programs have occurred since the PVCCSP EIR was certified and new regulatory programs have been adopted; updated regulations are also discussed for each topical issue in Section 4.0, as appropriate.

The City of Perris is in the Perris Block geologic unit, which lies within the Peninsular Ranges Geomorphic Province of Southern California. The Peninsular Ranges Geomorphic Province is characterized by a series of northwesterly trending mountain ranges that extend from the coast of California eastward into the California desert and south to the tip of Baja California, Mexico. The Perris Block is bound on the northeast by the San Jacinto Fault, on the north by the Cucamonga Fault and the San Gabriel Mountains, and on the southwest by the Elsinore Fault and the Santa Ana Mountains. The City of Moreno Valley borders Perris to the north and the City of Menifee borders the City to the south. Unincorporated areas of Riverside County border the City to the east and west.

As shown in the aerial photograph provided in Figure 3-2, the Project area is vacant and undeveloped, except for the eastern portion of the Project area that includes the PVSD Channel, and the existing Rider Street bridge over the PVSD Channel. The Rider 2 and Rider 4 sites can generally be characterized as disced and disturbed vacant land that was historically utilized for agricultural purposes. The Rider 2 and Rider 4 sites are within the existing 100-year flood plain for the PVSD Channel. The PVSD Channel is an engineered flood control channel that is mowed and maintained on an annual basis by the Riverside County Flood Control and Water Conservation District (RCFC&WCD). The existing Rider Street bridge (State Bridge No. 56C0536) over the PVSD Channel was constructed in 2005 and is a cast-in-place reinforced concrete box culvert (RCB) structure, as further described in Section 3.6.2, *PVSD Channel and Rider Street Bridge Improvements*, below.

The land uses surrounding the Project area include undeveloped vacant land to the north; industrial uses to the west (including the Rider 3 warehouse to the west of the Rider 2 site); vacant land, non-conforming residential uses, and a Southern California Edison (SCE) Bunker Substation to the south, across Rider Street; Morgan Park to the northeast; and vacant land to the east, with residential uses further to the east. The CRA extends underground between the Rider 2 and Rider 4 sites and connects to the PVSD Channel within the Project area.

The existing General Plan land use designation and zoning for the Project area is Specific Plan (i.e., the PVCCSP) (City of Perris, 2013). The Rider 2 and Rider 4 sites are designated for Light Industrial uses in the PVCCSP, and the PVSD Channel is designated for the Future Perris Valley Storm Drain. The MWD property that extends between the Rider 2 and Rider 4 sites is designated Public/Semi-Public Facility, and Trail, including the area that extends into the PVSD Channel improvement area (City of Perris, 2018). As further discussed in Section 4.11, *Land Use and Planning*, of this EIR, the PVCCSP land use designation for areas surrounding the Project area to west and south is also Light Industrial. The area north of the Project area is designated as Business Professional Office. This zone combines the General Plan Land Use designations of Business Park and Professional Office. The area immediately to the east of the Project area is within the New Horizons Specific Plan area, which encompasses the area east of the PVSD Channel, south of Morgan Street, north Rider Street and west of Evans Road.



Source(s): Nearmap Imagery (2019), RCLMA (2019)

Figure 3-2



Aerial Photograph

The Rider 2 and Rider 4 sites are generally flat with elevations ranging from approximately 1,430 to 1,450 feet above mean sea level (amsl), descending gradually to the southeast. A dirt road extends along the future alignment of Morgan Street along the northern boundary of the Rider 4 site, and Redlands Avenue was recently constructed by the Project Applicant along the western boundary of the Rider 2 and Rider 4 sites.

The Project area is within the Mead Valley Area Plan of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and is not within an MSHCP Criteria Cell, Core or Linkage Area, or Mammal or Amphibian Survey Area. The Project area is in the Criteria Area Plant Species Survey Area, Narrow Endemic Plant Species Survey Area, and Burrowing Owl Survey Area. Additionally, the PVSD Channel improvement area is a water feature that is mapped as Public/Quasi-Public (PQP) Conserved lands. The Rider 2 and Rider 4 sites include disturbed/developed and ruderal vegetation types. The PVSD Channel improvement area includes the following vegetation/land use types: developed, ruderal (upland), ruderal (channel), and disturbed southern riparian scrub. The PVSD Channel improvement area contains areas under the jurisdiction of the U.S. Army Corps of Engineers (Corps), Regional Water Quality Control Board (RWQCB), and California Department of Fish Wildlife (CDFW). MSHCP Riparian/Riverine area in the Project area occurs wholly within the PVSD Channel improvement area and is identical to that of CDFW jurisdiction.

The Project area is located approximately 2.6 miles southeast of the March Air Reserve Base/Inland Port (MARB/IP) Airport, is within the MARB/IP Airport Influence Policy Area, and is within the City's Airport Overlay Zone. Specifically, the Rider 2 site is within the Outer Horizontal Surface and Approach/Departure Clearance Surface of the Federal Aviation Regulations (FAR), Part 77 (Imaginary Surfaces), and Compatibility Zone C1 (Primary Approach/Departure Zone) and Zone D (Flight Corridor Buffer) of the 2014 MARB/IP Airport Land Use Compatibility Plan (ALUCP). The Rider 4 site is within the Outer Horizontal Surface, Transitional, Conical Surface, and Primary Approach/Departure Clearance Surface of the FAR, Part 77 (Imaginary Surfaces), and Compatibility Zone D of the 2014 MARB/IP ALUCP.

3.5 PROJECT OBJECTIVES

Section 15124 of the State CEQA Guidelines establishes the requirement to address Project objectives in an EIR project description. In addition to addressing the underlying project purpose, the objectives are also relevant to the development of the alternatives that are considered in the EIR and in the preparation of findings or a statement of overriding considerations, if necessary, in support of the decision-making action by the City.

The fundamental purpose and goal of the IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project is to accomplish the orderly development of industrial warehouse buildings in the northern portion of the City of Perris, and near the designated truck route, to increase employment opportunities in a housing rich area. This underlying purpose aligns with various aspects of the Southern California Association of Governments' (SCAG's) draft 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) primarily related to accommodating goods movement industries and balancing job and housing opportunities in local areas to reduce long commutes from home to work. SCAG identifies the Inland Empire as a housing rich area and coastal communities as job rich areas and is striving in their policies to achieve more equal balances locally. The Project would achieve its underlying purpose and goal through the following objectives:

1. Implement the Perris Valley Commerce Center Specific Plan through development of land uses allowed by the Light Industrial land use designation and consistent with the Standards and Guidelines relevant to the Project area and proposed uses.
2. Implement City of Perris General Plan policies and objectives relevant to the Project area and proposed industrial development.
3. To expand economic development and facilitate job creation in the City of Perris by establishing a new industrial development area adjacent to an already-established industrial area, including the initial phase of the Rider Logistics Center.
4. Maximize development of Class A speculative high cube warehouse industrial buildings in the Project area that meet contemporary industry standards for operational design criteria, can accommodate a wide variety of users, and are economically competitive with similar warehouse buildings in the local area and region, which will assist the City of Perris in competing economically on a domestic and international scale through the efficient and cost-effective movement of goods.
5. To attract new businesses to the City of Perris and thereby provide a more equal jobs-housing balance in the Riverside County/Inland Empire area that will reduce the need for members of the local workforce to commute outside the area for employment.
6. Provide for uses that will generate tax revenue for the City of Perris including, but not limited to, increased property tax, in order to support the City's ongoing municipal operations.
7. Provide Class A high cube warehouses that take advantage of the area's proximity to various freeways and existing and planned transportation corridors to reduce traffic congestion on surface streets and to reduce concomitant air pollutant emissions from vehicle sources.
8. Accommodate new development in a phased, orderly manner that is coordinated with the provision of necessary infrastructure and public improvements.
9. Implement PVSD Channel Improvements anticipated by the PVCMDP and PVCCSP in conjunction with the adjacent Rider 2 and Rider 4 high cube warehouse buildings to accommodate the 100-year storm flows in the area.
10. To assist the SCAG region in achieving jobs/housing balance region-wide by providing additional job opportunities in a housing rich area of the Inland Empire.

3.6 PROJECT COMPONENTS

It is the intent of the PVCCSP to facilitate development of the area in an orderly and consistent fashion, that is coordinated with the provision of necessary infrastructure and public improvements, including regional storm drain facilities. Land use designations and permitted uses are defined in Section 2.0 of the PVCCSP. Development standards, design guidelines, and landscape standards that define the City's expectations for development of the area are included in Sections 4.0 and 5.0 of the PVCCSP.

The PVCCSP designates the Rider 2 and Rider 4 sites for light industrial uses. As allowed under this land use designation, the Project involves the construction and operation of two Class A high cube, non-refrigerated warehouse buildings. High cube warehouses are primarily used for the storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials) prior to their distribution to retail locations or other warehouses. As described in this section, the proposed buildings have been designed to comply with the standards and guidelines set forth in the PVCCSP including, but not limited

to, the following: on-site design standards and guidelines (including site layout, architecture, lighting, and others), off-site design standards and guidelines (including circulation and infrastructure), landscaping, industrial design standards and guidelines, and infrastructure.

With respect to the PVSD Channel, implementation of the ultimate, system-wide storm drain improvements outlined in the PVMDP is dependent on the ultimate buildout of the PVSD Channel. The Project includes construction of the PVSD Channel improvements adjacent to the Rider 2 and Rider 4 building sites consistent with the PVCMDP (refer to Figure 3-3, *Proposed Project Components*). The PVSD Channel improvements have independent utility, because these improvements will provide flood control protection, regardless of when the ultimate PVSD Channel is completed.

The following key Project components are described in this section, and applicable PVCCSP standards and guidelines that are incorporated into the Project design are identified:

- Proposed High Cube Warehouse Buildings 2 & 4
 - Vehicular and Non-Vehicular Circulation and Parking
 - Landscape, Linear Trail, Screenwalls/Hardscape and Lighting
 - Utilities/Infrastructure
 - Operational Characteristics
- PVSD Channel and Rider Street Bridge Improvements
- Construction Activities

3.6.1 PROPOSED HIGH CUBE WAREHOUSE BUILDINGS 2 & 4

The Project involves the construction and operation of two Class A high cube warehouse buildings (Rider 2 and Rider 4) totaling 1,352,736 square feet (sf) of building space on approximately 65 net acres (refer to Figure 3-3, *Proposed Project Components*, which provides an overview of the proposed Project); and Figure 3-4 and Figure 3-5, which provide individual site plans for the Rider 2 and Rider 4 building sites, respectively.

As shown in Table 3-1, *Rider 2 and Rider 4 Building Summary*, the Rider 2 building would be 804,759 sf including warehouse and office space, and the Rider 4 building would be 547,977 sf including warehouse and office space. Space to accommodate two 5,000 sf office areas is provided in both buildings; the office locations are designated to be located at the corners of the buildings. The proposed buildings would comply with the development standards outlined in Table 4.0-1, *Development Standards by Land Use*, of the PVCCSP, including, but not limited to structure size/floor area ratio, lot coverage by structure, and height requirements.

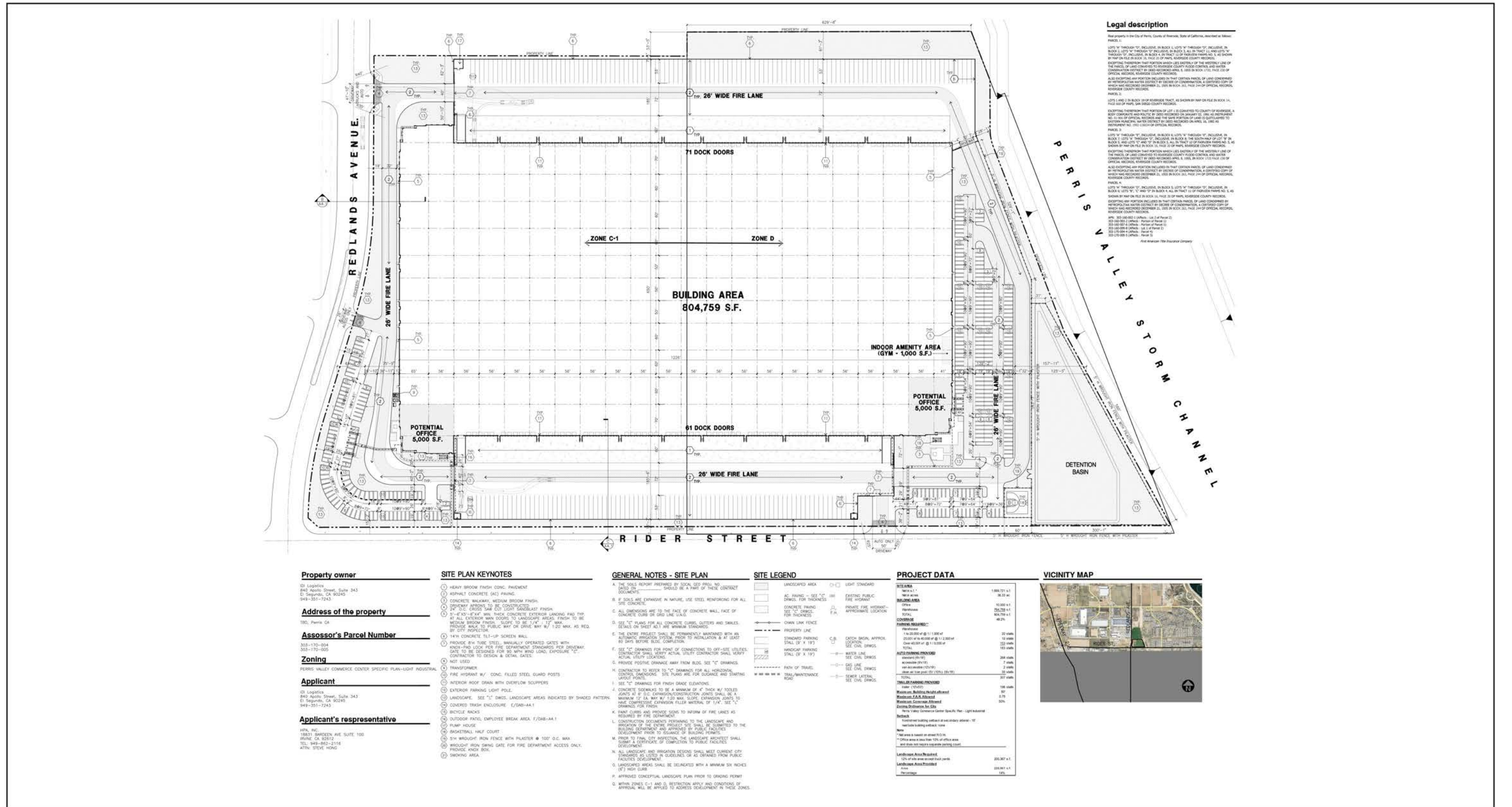


Source(s): Webb Associates (06-16-2020)

Figure 3-3



Proposed Project Components



Legal description

Map owned by the City of Perris, County of Riverside, State of California, described as follows:

PARCELS 1:

LOTS 10 THROUGH 12, INCLUSIVE, IN BLOCK 4, LOTS 10 THROUGH 12, INCLUSIVE, IN BLOCK 4, LOTS 10 THROUGH 12, INCLUSIVE, IN BLOCK 4, ALL IN TRACT 12 AND LOTS 10 THROUGH 12, INCLUSIVE, IN BLOCK 4, ALL IN TRACT 12 OF PERRIS PARCELS NO. 6, AS SHOWN BY MAP ON FILE IN BOOK 14, PAGE 24 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

EXCEPTING THEREFROM THAT PORTION WHICH LIES EASTERNLY OF THE WESTERN LINE OF THE PARCELS OF LAND COVERED BY RIVERSIDE COUNTY RECORDS CONTROL AND WATER CONVEYANCE INSTRUMENTS BY DEEDS RECORDED IN BOOK 14, PAGE 24 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

ALSO EXCEPTING ANY PORTION INCLUDED IN THAT CERTAIN PARCEL OF LAND COVERED BY INSTRUMENTATION WATER DISTRICT BY DEEDS RECORDED IN BOOK 14, PAGE 24 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

PARCELS 2:

LOTS 1 AND 2 IN BLOCK 28 OF RIVERSIDE TRACT, AS SHOWN BY MAP ON FILE IN BOOK 14, PAGE 24 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

EXCEPTING THEREFROM THAT PORTION OF LOT 1 COVERED BY INSTRUMENTATION WATER DISTRICT BY DEEDS RECORDED IN BOOK 14, PAGE 24 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

PARCELS 3:

LOTS 10 THROUGH 12, INCLUSIVE, IN BLOCK 4, LOTS 10 THROUGH 12, INCLUSIVE, IN BLOCK 4, LOTS 10 THROUGH 12, INCLUSIVE, IN BLOCK 4, ALL IN TRACT 12 OF PERRIS PARCELS NO. 6, AS SHOWN BY MAP ON FILE IN BOOK 14, PAGE 24 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

EXCEPTING THEREFROM THAT PORTION WHICH LIES EASTERNLY OF THE WESTERN LINE OF THE PARCELS OF LAND COVERED BY RIVERSIDE COUNTY RECORDS CONTROL AND WATER CONVEYANCE INSTRUMENTS BY DEEDS RECORDED IN BOOK 14, PAGE 24 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

ALSO EXCEPTING ANY PORTION INCLUDED IN THAT CERTAIN PARCEL OF LAND COVERED BY INSTRUMENTATION WATER DISTRICT BY DEEDS RECORDED IN BOOK 14, PAGE 24 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

PARCELS 4:

LOTS 10 THROUGH 12, INCLUSIVE, IN BLOCK 4, LOTS 10 THROUGH 12, INCLUSIVE, IN BLOCK 4, LOTS 10 THROUGH 12, INCLUSIVE, IN BLOCK 4, ALL IN TRACT 12 OF PERRIS PARCELS NO. 6, AS SHOWN BY MAP ON FILE IN BOOK 14, PAGE 24 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

EXCEPTING ANY PORTION INCLUDED IN THAT CERTAIN PARCEL OF LAND COVERED BY INSTRUMENTATION WATER DISTRICT BY DEEDS RECORDED IN BOOK 14, PAGE 24 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

ALSO EXCEPTING ANY PORTION INCLUDED IN THAT CERTAIN PARCEL OF LAND COVERED BY INSTRUMENTATION WATER DISTRICT BY DEEDS RECORDED IN BOOK 14, PAGE 24 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

APR. 2015 (REV. 04/15) (Project - Lot 2 of Parcel 1)
 2015-08-04 (Project - Parcel 1)
 2015-08-04 (Project - Lot 1 of Parcel 1)
 2015-08-04 (Project - Parcel 1)
 2015-08-04 (Project - Parcel 1)
 2015-08-04 (Project - Parcel 1)
 2015-08-04 (Project - Parcel 1)

First American Title Insurance Company

Property owner
 IDI Logistics
 840 Apollo Street, Suite 343
 Escondido, CA 92025
 949-351-7243

Address of the property
 180, Perris, CA

Assessor's Parcel Number
 303-170-004
 303-170-005

Zoning
 PERRIS VALLEY COMMERCIAL CENTER SPECIFIC PLAN-INDUSTRIAL

Applicant
 IDI Logistics
 840 Apollo Street, Suite 343
 Escondido, CA 92025
 949-351-7243

Applicant's representative
 HPA, INC.
 15831 BARDEEN AVE SUITE 100
 IRVINE, CA 92612
 TEL: 949-862-2116
 ATTN: STEVE HONG

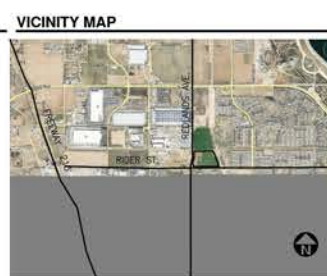
- SITE PLAN KEYNOTES**
- HEAVY BROOM FINISH CONC. PAVEMENT
 - ASPHALT CONCRETE (AC) FINISH
 - CONCRETE WALKWAY, MEDIUM BROOM FINISH
 - CONCRETE FINISH TO BE CONSTRUCTED
 - ALL DIMENSIONS ARE TO THE FACE OF CONCRETE CURB, FACE OF CONCRETE CURB OR CURB LINE (WALL)
 - 3'-6" x 6'-0" x 4" MIN. THICK CONCRETE EXTERIOR LANDING AND TYP. AT ALL EXTERIOR MAIN DOORS TO LANDSCAPE AREAS. FINISH TO BE MEDIUM BROOM FINISH. SLOPE TO BE 1/4" / 1' MIN. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY W/ 1:20 MAX. AS REQ. BY CITY ORDINANCE.
 - 14" CONCRETE TILT-UP SCREEN WALL
 - PROVIDE 8" X 8" TUBE STEEL MANUALLY OPERATED GATES WITH KNOCK-DOWN LOCK PER FIRE DEPARTMENT STANDARDS FOR DRIVEWAY GATE TO BE DESIGNED FOR 90 MPH WIND LOAD, EXPOSURE "C". COORDINATE TO DESIGN & DETAIL GATES.
 - NOT USED
 - TRANSFORMER
 - FIRE HYDRANT W/ CONC. FILLED STEEL GUARD POSTS
 - INTERIOR ROOF DRAIN WITH OVERFLOW SCUPPERS
 - EXTERIOR PARKING LIGHT POLE
 - LANDSCAPE: SEE "C" DRAWING. LANDSCAPE AREAS INDICATED BY SHADDED PATTERNS
 - COVERED TRASH ENCLOSURE: E/SAB-4A.1
 - BICYCLE RACKS
 - OUTDOOR PATIO, EMPLOYEE BREAK AREA, F/DBB-AA.1
 - PUMP HOUSE
 - BOULEVARD HALF COURT
 - 5/8" WROUGHT IRON FENCE WITH PLASTER @ 100' O.C. MAX.
 - WROUGHT IRON DRIVING GATE FOR FIRE DEPARTMENT ACCESS ONLY. PROVIDE KNOCK BOX.
 - SMOKING AREA

- GENERAL NOTES - SITE PLAN**
- THE SOILS REPORT PREPARED BY SOCOL GEO-PRO, INC. SAID TO BE SHOULD BE A PART OF THESE CONCEPT DRAWINGS.
 - IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL 3"R.C. CONCRETE.
 - ALL DIMENSIONS ARE TO THE FACE OF CONCRETE CURB, FACE OF CONCRETE CURB OR CURB LINE (WALL)
 - SEE "C" DRAWING FOR ALL CONCRETE CURBS, CUTTERS AND SINKS. DETAILS ON SHEET A-1 ARE MINIMUM STANDARDS.
 - THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM. PRIOR TO INSTALLATION & AT LEAST 90 DAYS BEFORE BLDG. COMPLETION.
 - SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS SHALL VERIFY ACTUAL UTILITY LOCATIONS.
 - PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS.
 - CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
 - SEE "C" DRAWINGS FOR FINISH GRADE ELEVATIONS.
 - CONCRETE DIMENSIONS TO BE A MINIMUM OF 4" THICK W/ 100#D JOINTS AT 8' O.C. COMPANION/CONSTRUCTION JOINTS SHALL BE A MINIMUM OF 2" W/ 100#D MAX. SLOPE. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". SEE "C" DRAWINGS FOR FINISH.
 - WANT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
 - 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.
 - PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
 - ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS DERIVED FROM PUBLIC FACILITIES DEVELOPMENT.
 - LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB.
 - APPROVED CONCEPTUAL LANDSCAPE PLAN PRIOR TO GRADING PERMIT.
 - WITHIN ZONES C-1 AND D, RESTRICTION APPLY AND CONDITIONS OF APPROVAL WILL BE APPLIED TO ADDRESS DEVELOPMENT IN THESE ZONES.

- SITE LEGEND**
- LANDSCAPED AREA
 - AC FINISH - SEE "C" DRAWING FOR THICKNESS
 - CONCRETE FINISH - SEE "C" DRAWING FOR THICKNESS
 - CONCRETE WALKWAY
 - CONCRETE FINISH TO BE CONSTRUCTED
 - PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY W/ 1:20 MAX. AS REQ. BY CITY ORDINANCE.
 - 14" CONCRETE TILT-UP SCREEN WALL
 - PROVIDE 8" X 8" TUBE STEEL MANUALLY OPERATED GATES WITH KNOCK-DOWN LOCK PER FIRE DEPARTMENT STANDARDS FOR DRIVEWAY GATE TO BE DESIGNED FOR 90 MPH WIND LOAD, EXPOSURE "C". COORDINATE TO DESIGN & DETAIL GATES.
 - NOT USED
 - TRANSFORMER
 - FIRE HYDRANT W/ CONC. FILLED STEEL GUARD POSTS
 - INTERIOR ROOF DRAIN WITH OVERFLOW SCUPPERS
 - EXTERIOR PARKING LIGHT POLE
 - LANDSCAPE: SEE "C" DRAWING. LANDSCAPE AREAS INDICATED BY SHADDED PATTERNS
 - COVERED TRASH ENCLOSURE: E/SAB-4A.1
 - BICYCLE RACKS
 - OUTDOOR PATIO, EMPLOYEE BREAK AREA, F/DBB-AA.1
 - PUMP HOUSE
 - BOULEVARD HALF COURT
 - 5/8" WROUGHT IRON FENCE WITH PLASTER @ 100' O.C. MAX.
 - WROUGHT IRON DRIVING GATE FOR FIRE DEPARTMENT ACCESS ONLY. PROVIDE KNOCK BOX.
 - SMOKING AREA

PROJECT DATA

ITEM	QUANTITY	UNIT
STAIRS	1	1,000 S.F.
MECH. ROOM	1	1,000 S.F.
OFFICE	10,000	S.F.
INDOOR AMENITY AREA (GYM)	1,000	S.F.
POTENTIAL OFFICE	5,000	S.F.
POTENTIAL OFFICE	5,000	S.F.
BUILDING AREA	804,759	S.F.
DECK AREA	10,000	S.F.
LANDSCAPED AREA	10,000	S.F.
CONCRETE	10,000	S.F.
ASPHALT	10,000	S.F.
CONCRETE WALKWAY	10,000	S.F.
CONCRETE FINISH TO BE CONSTRUCTED	10,000	S.F.
PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY W/ 1:20 MAX. AS REQ. BY CITY ORDINANCE.		

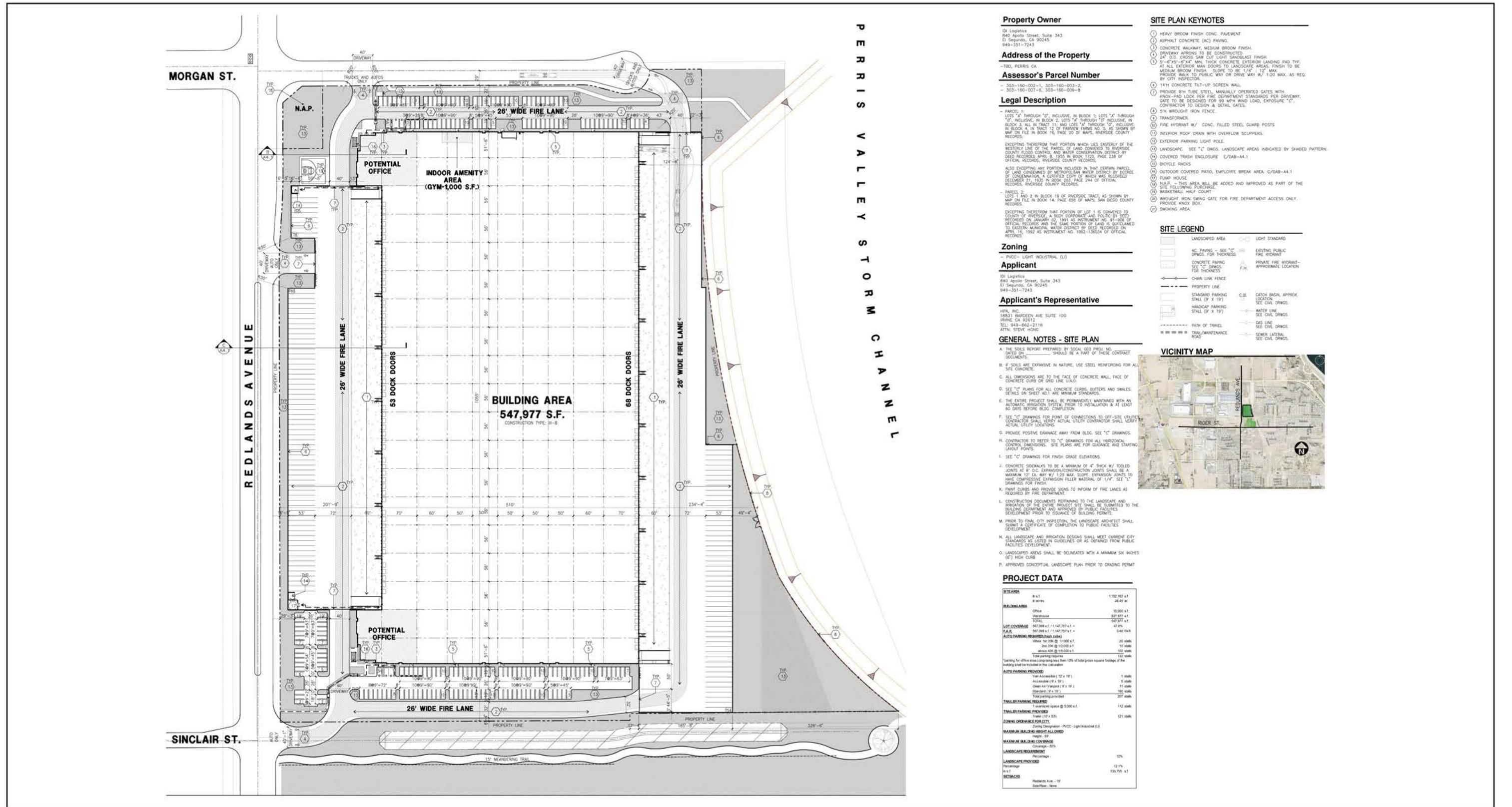


Source(s): HPA (03-27-2020)

Figure 3-4



Conceptual Site Plan – Rider 2 Building



Source(s): HPA (03-27-2020)

Figure 3-5



Conceptual Site Plan – Rider 4 Building

Table 3-1 Rider 2 and Rider 4 Building Summary

	Rider 2	Rider 4	Total
Office Floor Space	10,000 sf	10,000 sf	20,000 sf
Warehouse Floor Space	794,759 sf	537,977 sf	1,332,736 sf
Total Building Area	804,759 sf	547,977 sf	1,352,736 sf
Lot Coverage (maximum 50% of lot allowed)	49.5%	47.7%	
Floor Area Ratio (FAR) (maximum 0.75 FAR allowed)	.50	.49	
Building Height (maximum height of 50 feet allowed)	44' 10"	44' 10"	
sf: square feet; NA: Not Applicable			

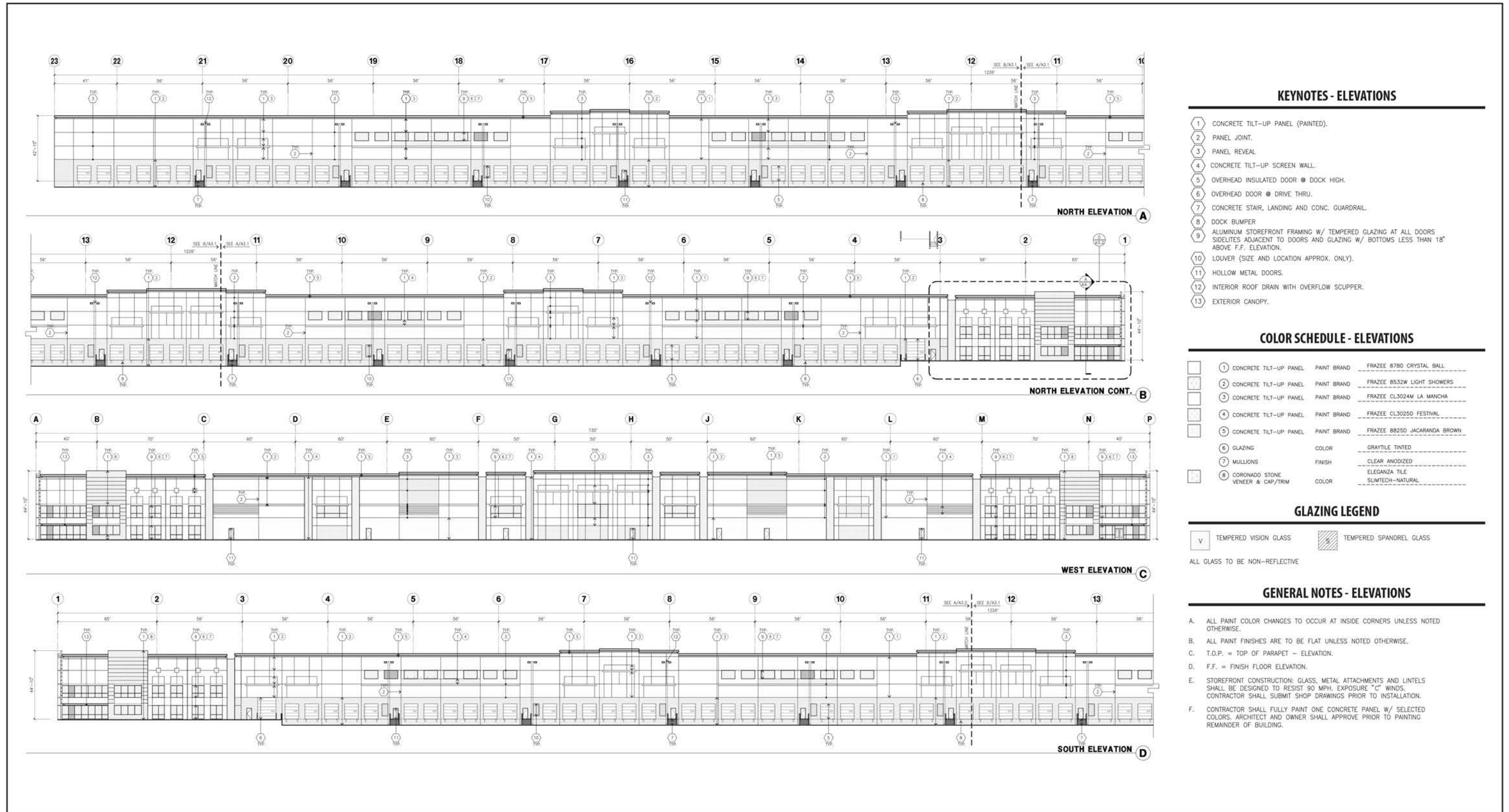
As shown on the site plans, both of the buildings are rectangular-shaped. The Rider 2 building is approximately 1,226 feet long and 650 feet wide with 132 dock doors located on the north and south sides of the building. The Rider 4 building is approximately 1,055 feet long and 510 feet wide with 121 dock doors located on the east and west sides of the building. The truck courts for each building would be enclosed and screened from view, as further discussed in Section B, *Landscape/Hardscape, Linear Trail, Screen Walls, and Lighting*, below.

Conceptual building elevations are provided in Figure 3-6 through Figure 3-9 and conceptual colored elevations are provided in Figure 3-10 and Figure 3-11. The proposed buildings have been designed to comply with applicable standards and guidelines outlined in Section 4.2.3 of the PVCCSP related to architecture (including scale, massing, and building relief, roofs and parapets, design and color and materials). In general, the architectural style consists of modern industrial design. The buildings would be constructed of painted concrete tilt-up panels and low-reflective materials, including low-reflective glass. The exterior color palette would be comprised of various shades of white and gray with accent colors. The office entry areas would feature a stone veneer. The proposed buildings would be a maximum of 44 feet 10 inches in height above the exterior finish grade level at the top of parapet, although the roof height would vary based on the building’s architectural features. As shown by the buildings’ elevations, visual relief from building form would be achieved through fenestration, mullions, exterior canopies at the office entries, and through variations in height and rooflines, and the use of parapets.

The various architectural elements would effectively avoid monotony and repetition in building elevations, and would minimize glare. It should also be noted that rooftop equipment would be screened behind the parapet and would not be visible from the street.

The Project would also include PVCCSP-required employee amenities. Specifically, a break room and coffee bar with internet access, would be provided within the proposed buildings. An approximately 1,000-sf gym would be provided north of the southwest office in the Rider 2 building and east of the northwest office in Rider 4 building. Half-court basketball areas would be provided near the Rider 4 building northwest office, and the Rider 2 building southwest office. Additionally, as further discussed under Section B, below, the Project includes an approximately 90-foot wide greenbelt south of the Rider 4 site (parallel to but outside the MWD right-of-way). Further, trash enclosures would be provided in the truck parking areas near each of the proposed office spaces; the trash enclosures would be screened as required by the PVCCSP.

A key objective of the PVCCSP is to promote sustainable development and to encourage the use of “green” technologies. The Project would be constructed in compliance with California Title 24 Energy

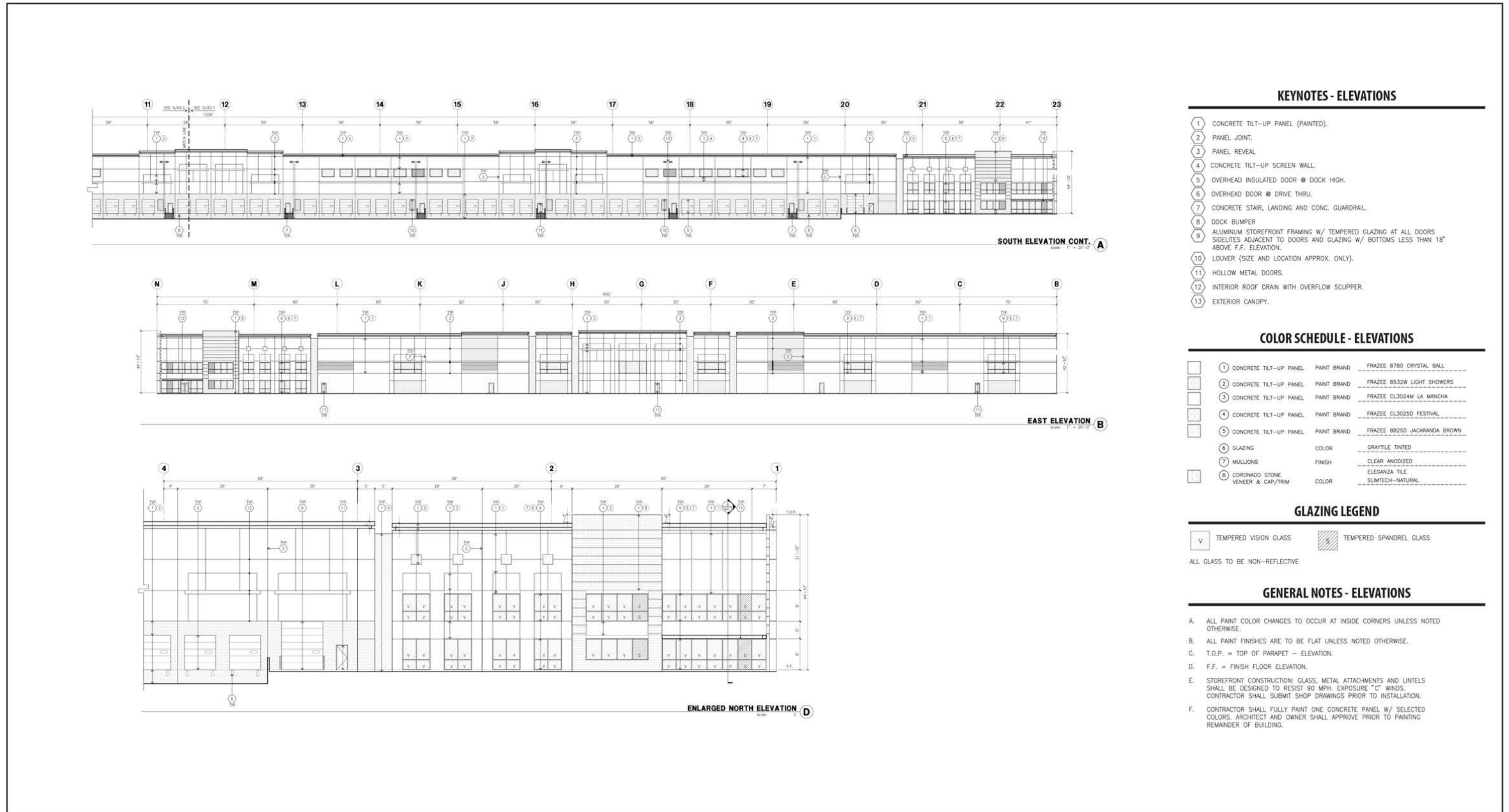


Source(s): HPA (03-05-2020)

Figure 3-6

Not to Scale

Conceptual Building Elevations – Rider 2 Building

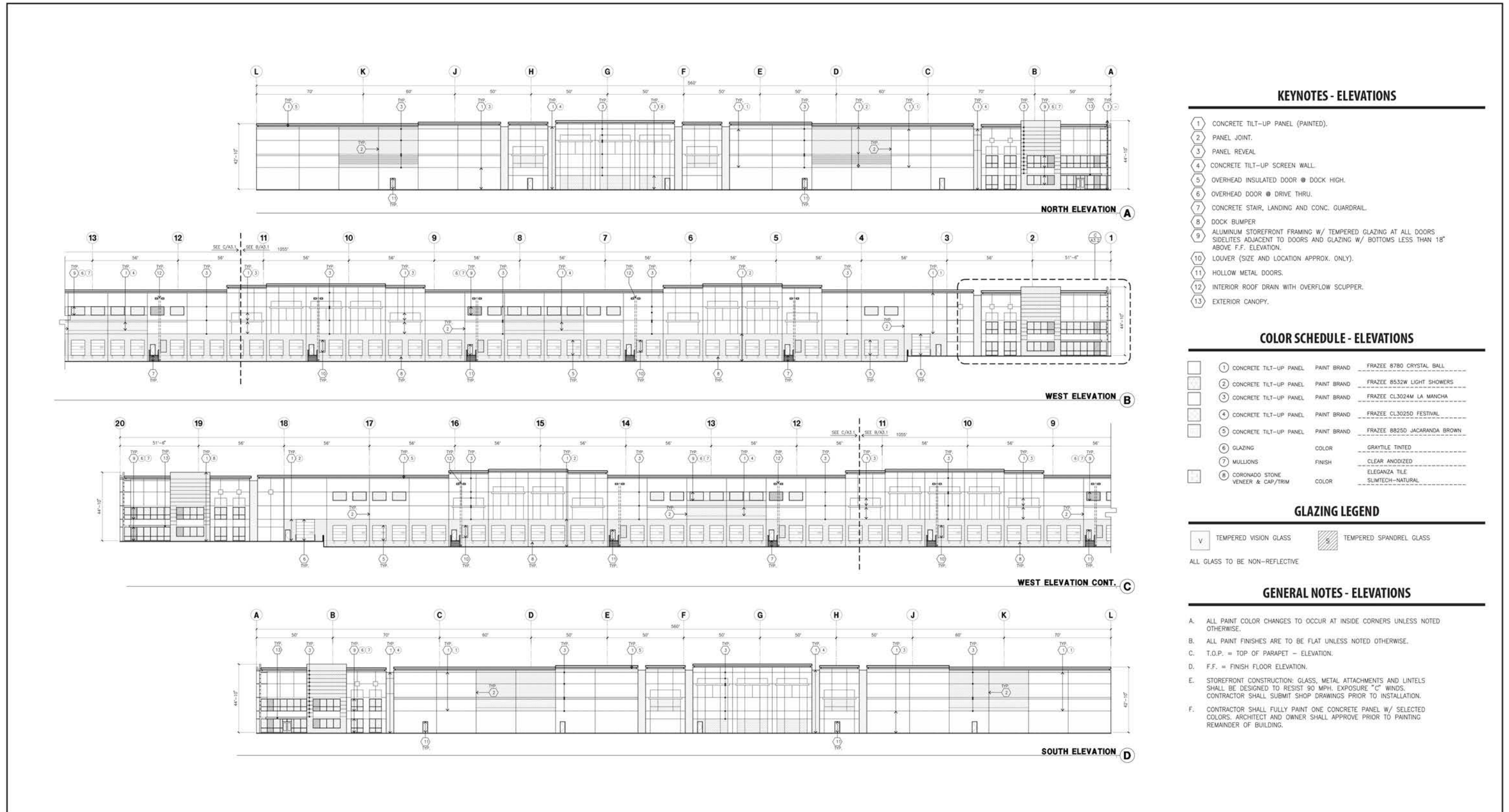


Source(s): HPA (03-05-2020)

Figure 3-7

Not to Scale

Conceptual Building Elevations – Rider 2 Building

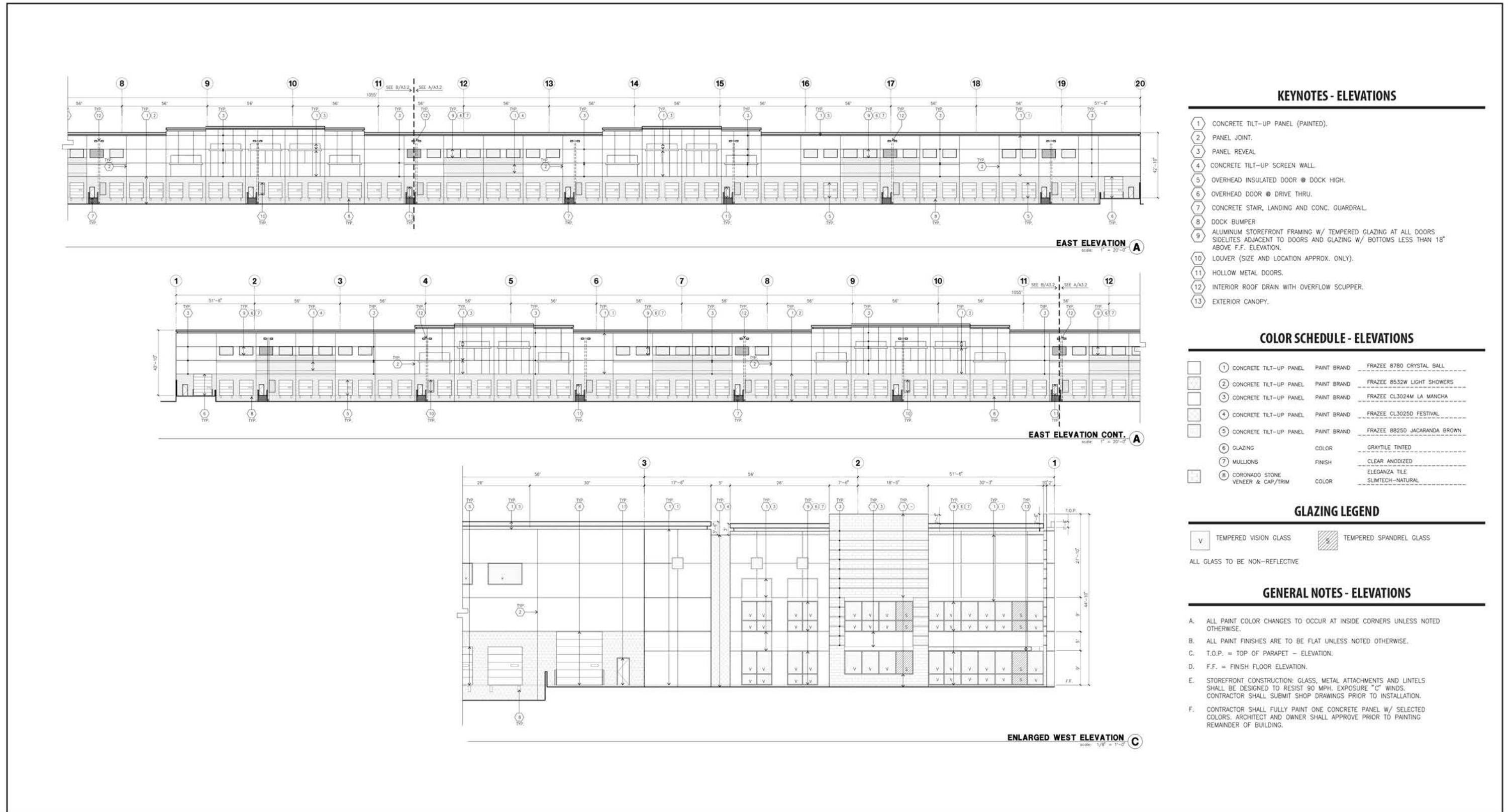


Source(s): HPA (02-18-2020)

Figure 3-8

Not to Scale

Conceptual Building Elevations – Rider 4 Building



Source(s): HPA (02-18-2020)

Figure 3-9

Not to Scale

Conceptual Building Elevations – Rider 4 Building



Source(s): HPA (02-14-2020)

Figure 3-10

Not to Scale

Conceptual Colored Elevations – Rider 2 Building



Source(s): HPA (02-18-2020)

Figure 3-11

Not to Scale

Conceptual Colored Elevations – Rider 4 Building

Efficiency Standards for Residential and Nonresidential Buildings and the Title 24 California Green Building Standards Code (CALGreen Code). Additionally, as presented in Section 4.8, Greenhouse Gas Emissions, of this EIR, the Project incorporates PVCCSP EIR mitigation measures that serve to reduce greenhouse gas emissions.

A Vehicular and Non-Vehicular Circulation and Parking

Section 3.0 of the PVCCSP contains the Infrastructure Plan, including a Circulation Plan, for the Specific Plan area. The Circulation Plan provides standards and guidelines related to vehicular circulation (including passenger vehicles, trucks, and mass transit) and non-vehicular circulation (including pedestrian and bicycle facilities). Additionally, Section 4.2.2.2 of the PVCCSP contains standards and guidelines related to vehicular access and on-site circulation. The Project has been designed to comply with the applicable standards and guidelines related to circulation, as applicable, and as described below.

Vehicular Circulation

The Project has been designed to comply with applicable PVCCSP standards and guidelines to minimize vehicular conflict and to address shared access, as well as large truck maneuverability. Roadway/circulation improvements that would be constructed as part of the Project are described below, and the physical impacts associated with construction of these improvements are evaluated in this EIR. Typical sections for roadways adjacent to the proposed building sites (Morgan Street, Redlands Avenue, Rider Street, and Sinclair Street) are provided in Figure 3-26, *Site Sections*, in Section 3.6.3, *Construction Activities*. It should be noted that Morgan Street, Redlands Avenue, and Rider Street are designated as a Major Roadway Visual Corridors in the PVCCSP and therefore are subject to specific streetscape requirements that are discussed in Section B, *Landscape/Hardscape, Linear Trail, Screen Walls, and Lighting*.

- **Morgan Street.** Morgan Street is an east-west oriented roadway located along the Project's northern boundary (forming the northern boundary of the Rider 4 site). The Project includes construction of Morgan Street at the half-section width for a Local Street (60-foot right-of-way) between Redlands Avenue and the Project's eastern boundary. A cul-de-sac would be constructed at the eastern end of Morgan Street. The Project Applicant would improve Morgan Street as required by the final Conditions of Approval for the Project and applicable City of Perris standards. Although the Project is only building to Local Street standards, ultimately it could still be constructed as a Secondary Arterial in the future, which is consistent with the PVCCSP.
- **Redlands Avenue.** Redlands Avenue is a north-south oriented roadway located along the Project's western boundary. Street improvements for Redlands Avenue are being constructed to its ultimate full-width as a Secondary Arterial as part of the Rider 1 and Rider 3 projects; this includes street improvements to the curb on the east side of the roadway adjacent to the Rider 2 and Rider 4 sites. The Project would include the construction of sidewalk and other streetscape improvements within the Project area, and as required by the final Conditions of Approval for the Project and applicable City of Perris standards.

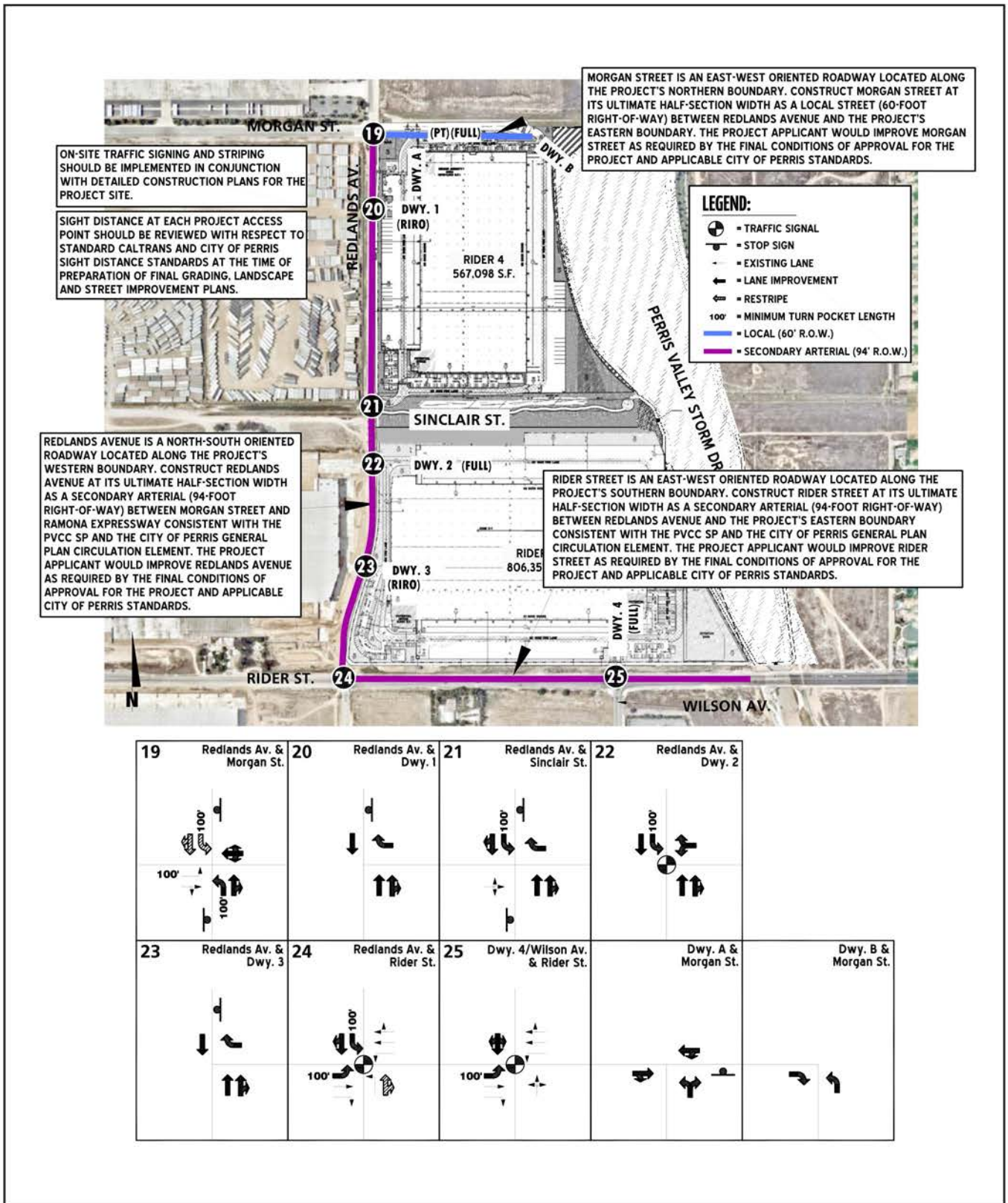
- **Rider Street.** Rider Street is an east-west oriented roadway located along the Project's southern boundary (forming the southern boundary of the Rider 2 site). As part of the Project, Rider Street would be constructed to its ultimate half-section width as a Secondary Arterial (94-foot right-of-way) between Redlands Avenue and the Project's eastern boundary consistent with the PVCCSP and the City of Perris General Plan Circulation Element. The Project Applicant would improve Rider Street as required by the final Conditions of Approval for the Project and applicable City of Perris standards. Refer to the description of the PVSD Channel improvements, below, which describes proposed improvements to the Rider Street bridge over the PVSD Channel that would be constructed as part of the Project.

Until such time that the planned I-215/Placentia Avenue interchange is constructed (estimated to open in 2021), Project truck traffic would be required to use Harley Knox Boulevard to access I-215 (via Redlands Avenue). Signage would be posted on site directing truck drivers to use the existing City truck routes. Following completion of the I-215/Placentia Avenue interchange, truck drivers would have the option to also access I-215 from Placentia Avenue. The traffic analysis in this EIR conservatively assumes that all of the truck traffic would either use the Harley Knox Boulevard interchange to access I-215, or the future Placentia Avenue interchange.

Regardless of the truck route used, access to the Project area would be provided from Morgan Street, Redlands Avenue, and Rider Street via six Project driveways (Driveway A, Driveway B, and Driveway 1 through Driveway 4). Access would also be provided from Sinclair Street. As shown on Figure 3-12, *Site Adjacent Roadway and Site Access Improvements*, access to the proposed Rider 4 building would be provided from two driveways along Morgan Street (Driveways A and B; trucks and automobiles), one driveway along Redlands Avenue (Driveway 1; trucks only), and from Sinclair Street (trucks and automobiles). Access to the Rider 2 building from two driveways along Redlands Avenue (Driveways 2 [trucks and automobiles] and 3 [automobiles only]), and one driveway along Rider Street (Driveway 4; automobiles only). It should be noted that the proposed buildings may accommodate multiple tenants. To avoid operational conflicts, the driveway locations are located to provide efficient access to each side of the buildings. The Project would include construction of the following site adjacent access improvements:

- **Redlands Avenue/Morgan Street Intersection.** Install a stop control on the westbound approach and construct the intersection with the following geometrics:
 - Northbound Approach (Redlands Avenue): One left turn lane with a minimum of 100 feet of storage and one shared through-right turn lane.
 - Southbound Approach (Redlands Avenue): One left turn lane with a minimum of 100 feet of storage and one shared through-right turn lane.
 - Eastbound Approach (Morgan Street): One left turn lane with 100 feet of storage and one shared through-right turn lane.
 - Westbound Approach (Morgan Street): One shared left-through-right turn lane.

There are two other full access driveways proposed along Morgan Street (Driveway A and Driveway B). Both Driveway A and Driveway B would have a stop control on the driveway (minor approach) with free flow along Morgan Street. Each approach would accommodate a single lane in each direction to facilitate site access.



Source(s): Urban Crossroads (02-26-2020)

Figure 3-12



Site Adjacent Roadway and Site Access Improvements

- **Driveway 1 at Redlands Avenue.** Install a stop control on the westbound approach and construct the intersection with the following geometrics:
 - Northbound Approach (Redlands Avenue): One through lane and one shared through-right turn lane.
 - Southbound Approach (Redlands Avenue): One through lane.
 - Westbound Approach (Driveway 1): One right turn lane.

- **Redlands Avenue/Sinclair Street Intersection.** Install a stop control on the eastbound and westbound approaches and construct the intersection with the following geometrics:
 - Northbound Approach (Redlands Avenue): One through lane and one shared through-right turn lane.
 - Southbound Approach (Redlands Avenue): One left turn lane with a minimum of 100 feet of storage, and one shared through-right turn lane.
 - Eastbound Approach (Sinclair Street): One shared left-through-right turn lane.
 - Westbound Approach (Sinclair Street): One right turn lane.

- **Driveway 2 at Redlands Avenue.** Install a traffic signal and construct the intersection with the following geometrics:
 - Northbound Approach (Redlands Avenue): One through lane and one shared through-right turn lane.
 - Southbound Approach (Redlands Avenue): One left turn lane with a minimum of 100 feet of storage and one through lane.
 - Westbound Approach (Driveway 2): One shared left-right turn lane.

- **Driveway 3 at Redlands Avenue.** Install a stop control on the westbound approach and construct the intersection with the following geometrics:
 - Northbound Approach (Redlands Avenue): One through lane and one shared through-right turn lane.
 - Southbound Approach (Redlands Avenue): One through lane.
 - Westbound Approach (Driveway 3): One right turn lane.

- **Redlands Avenue/Rider Street Intersection.** Install a traffic signal and construct the intersection with the following geometrics:
 - Northbound Approach (Redlands Avenue): One left turn lane with a minimum of 100 feet of storage and one shared through-right turn lane.
 - Southbound Approach (Redlands Avenue): One left turn lane with a minimum of 100 feet of storage and one shared through-right turn lane.
 - Eastbound Approach (Rider Street): One left turn lane with 100 feet of storage, one through lane, and one right turn lane.

- Westbound Approach (Rider Street): One left turn lane with a minimum of 100 feet of storage, one through lane, and one shared through-right turn lane.
- **Driveway 4/Wilson Avenue/Rider Street Intersection.** Install a traffic signal and construct the intersection with the following geometrics:
 - Northbound Approach: One shared left-through-right turn lane.
 - Southbound Approach (Driveway 4): One shared left-through-right turn lane.
 - Eastbound Approach (Rider Street): One left turn lane with a minimum of 100 feet of storage, one through lane, and one right turn lane.
 - Westbound Approach (Rider Street): One left turn lane with a minimum of 100 feet of storage, one through lane, and one shared through-right turn lane.

Internal site circulation would also comply with applicable City and Riverside County emergency access requirements; fire lanes are and access gates shown on the conceptual site plans provided in Figure 3-4 and Figure 3-5 for the Rider 2 site and Rider 4 site, respectively.

Non-Vehicular Circulation

Section 4.2.2.3 of the PVCCSP contains standards and guidelines related to pedestrian access and on-site circulation and the Project has been designed to comply with applicable standards and guidelines. As shown in Figure 3.0-5 of the PVCCSP, a regional trail is planned along the PVSD Channel (refer to the description of the PVSD Channel improvements provided below), and Class II (on-street) bike lanes are planned along Morgan Street and Rider Street adjacent to the Rider 2 and Rider 4 sites, respectively. As further discussed below, a linear trail would be constructed south of the Rider 4 site, north of the MWD easement, to accommodate pedestrian and bicycle travel between Redlands Avenue and the regional trail along the PVSD Channel.

With respect to pedestrian facilities, sidewalks would be provided adjacent to the building sites along Morgan Street, Redlands Avenue, and Rider Street. These sidewalks would allow for pedestrian access to other uses in the Project vicinity, to nearby bus routes, and to the regional trail system along the PVSD Channel, which would ultimately connect with the regional trail planned along the Ramona Expressway approximately 0.5 mile north of the Project area. The proposed improvements to Rider Street associated with the Rider 2 building would include construction of the planned on-street bikeway, consistent with the improvements made to the west as part of the Rider 3 Project; the Rider 3 Project improvements extend approximately 140 feet east of Redlands Avenue, adjacent to the Rider 2 site. Additionally, in compliance with existing requirements, bicycle parking would be provided (25 spaces for the Rider 2 building and 14 spaces for the Rider 4 building), and bicycle racks would be provided at the primary building entrances.

Parking

The Project has been designed to comply with Section 4.2.2.4 of the PVCCSP and Chapter 19.69 of the City of Perris Zoning Ordinance related to parking requirements. As shown on the conceptual site plans presented on Figure 3-4 and Figure 3-5, the Project is designed to include a total of 514 surface automobile spaces: 307 automobile spaces for the Rider 2 site, and 207 automobile spaces for the Rider 4 site. Additionally, 317 trailer spaces would be provided: 196 trailer spaces for the Rider 2 site, and 121

trailer spaces for the Rider 4 site. Automobile parking would consist of standard spaces, van accessible spaces, clean air/vanpool/electric vehicle spaces and accessible spaces. The automobile parking would exceed the required amount (183 spaces for the Rider 2 building and 132 spaces for the Rider 4 building).

B Landscape/Hardscape, Linear Trail, Screen Walls, and Lighting

Landscape/Hardscape

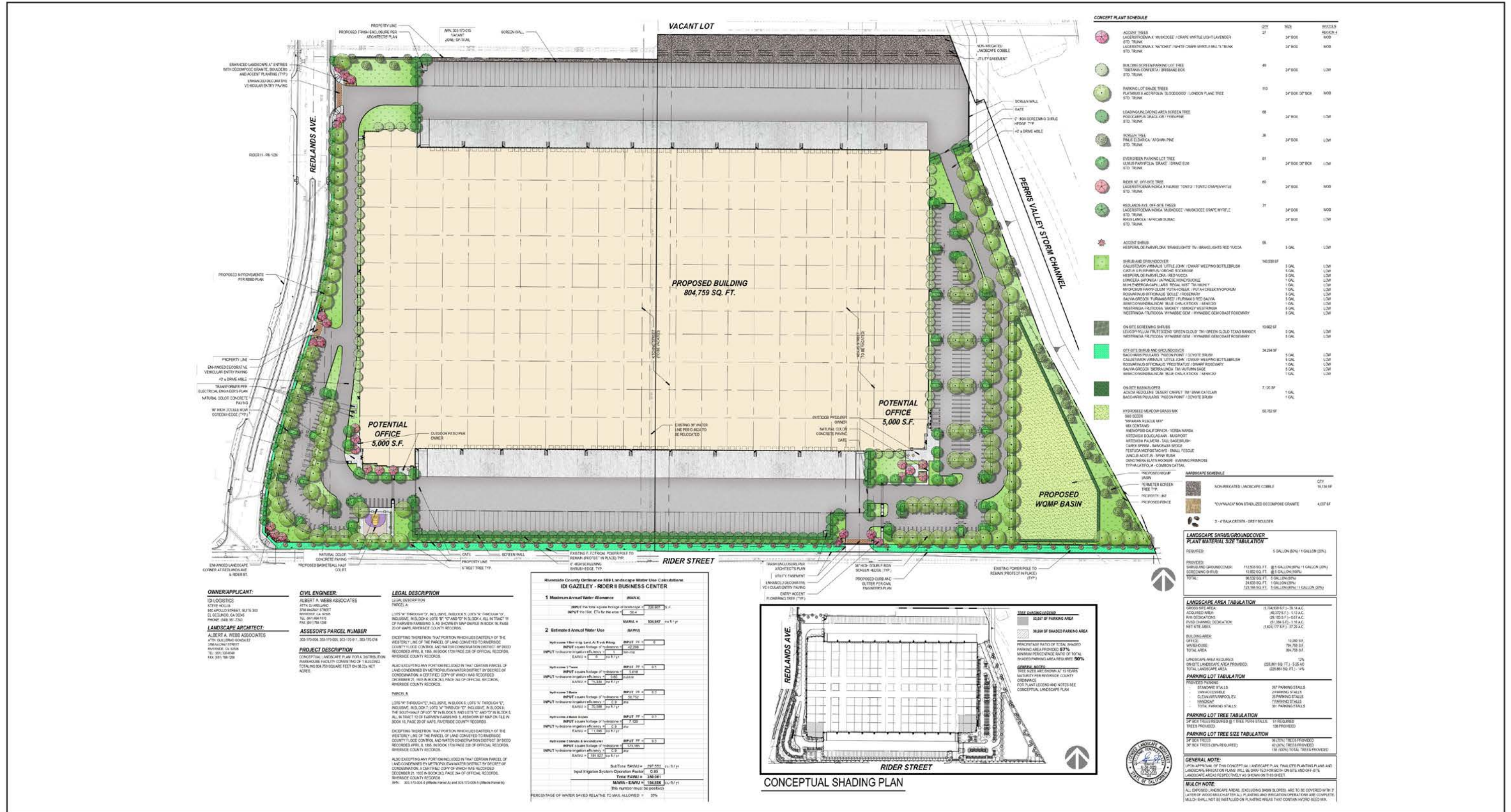
Section 6.0 of the PVCCSP addresses Landscape Standards and Guidelines, including on- and off-site landscape general requirements, planting guidelines, and irrigation and water conservation. In particular, requirements are set forth for landscaping along building perimeters, at street entries, in parking areas, as screen walls, and as part of streetscapes. Section 6.0 of the PVCCSP identifies recommended plant species and provides specific streetscape standards and associated streetscape section figures for the various types of roadways within the PVCCSP area. The PVCCSP also includes a Visual Overlay Zone (refer to Figure 4.0-17 of the PVCCSP) along I-215 and major roadways. Design standards and guidelines are provided to enhance the “visual zone,” which includes the field of vision from the roadway to the buildings. Morgan Street, Redlands Avenue, and Rider Street are designated as a “Major Roadway Visual Corridor” and are subject to the standards and guidelines outlined in Section 4.2.9.2, Major Roadway Visual Zones, of the PVCCSP.

The conceptual landscape plans for the Rider 2 and Rider 4 sites are shown on Figure 3-13 and Figure 3-14, respectively. The PVCCSP requires a minimum 12 percent landscape coverage for development in Light Industrial areas. The Rider 2 site includes 14 percent landscape coverage and the Rider 4 site includes 12.1 percent landscape coverage. Landscape materials would include a variety of trees (e.g., for accent, screening, shade, and street), shrubs (e.g., for accent, groundcover, screening), and grass mix (for the detention basin). Proposed plant materials would have either low or moderate water needs and would be consistent with Section 6.1.3 of the PVCCSP, On-Site Plant Palette, or if approved by the City, plants that are consistent with California Friendly Landscape and that meet all minimum City of Perris Water Conservation Requirements, as defined in Chapter 19.70 of the City’s Zoning Ordinance.

The Project would also include various hardscape elements throughout the Project area. Paving would consist of concrete for the parking areas, and decorative concrete paving (colored) at the access driveways along Morgan Street, Redlands Avenue, and Rider Street.

Linear Trail

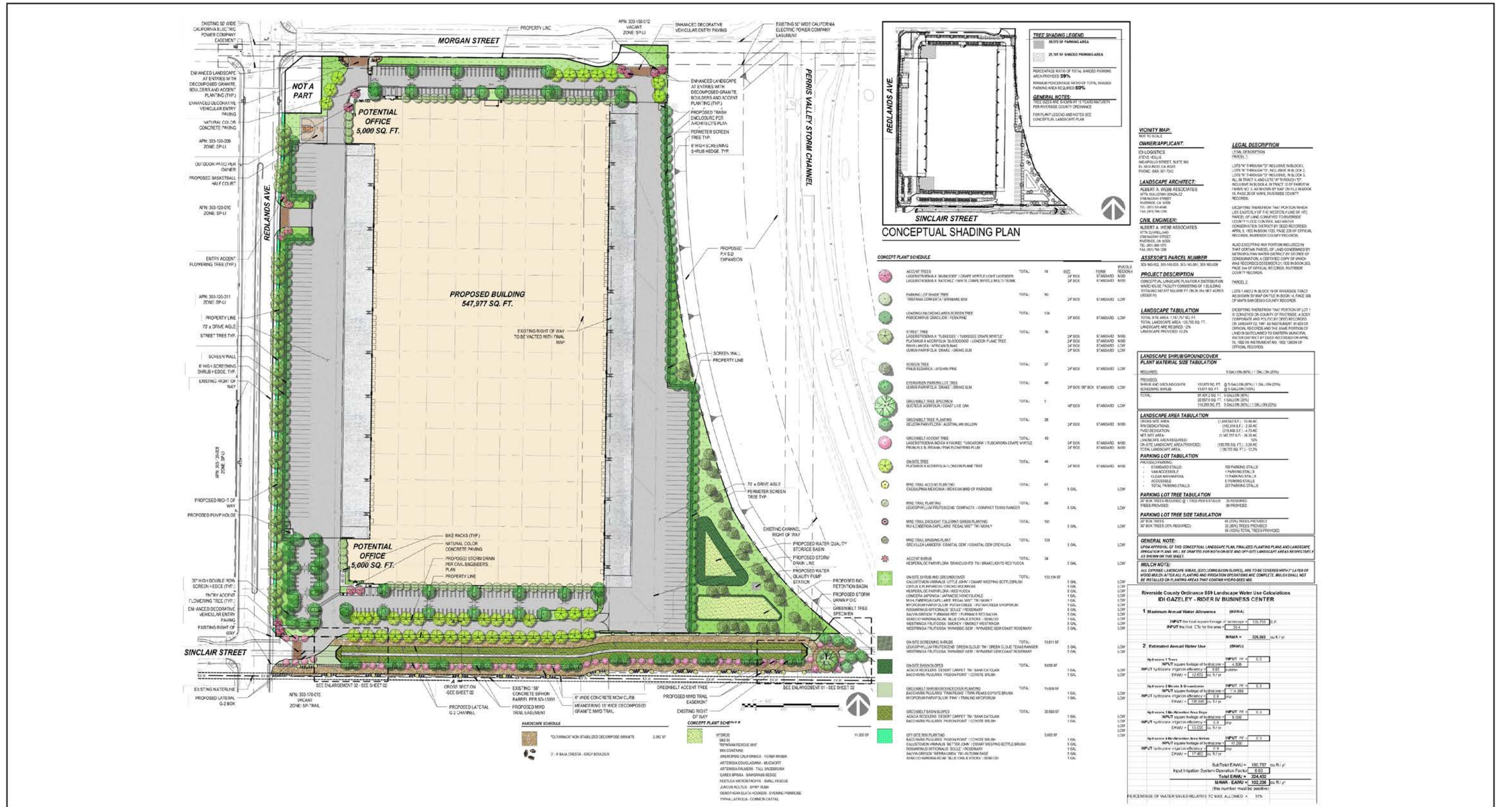
As shown in Figure 3.0-6 of the PVCCSP, a trail is envisioned within the MWD property that extends in an east-west direction through the PVCCSP area (referred to in the PVCCSP as the “MWD trail”). In proximity to the Project area, the MWD property parallels the south side of Sinclair Street from Perris Boulevard to Redlands Avenue, and existing dedicated right-of-way for the extension of Sinclair Street, east to the PVSD Channel. The MWD trail is expected to ultimately extend along the south side of the Sinclair Street right-of-way between the Rider 2 and Rider 4 sites. Use of the MWD easement between the Rider 2 and Rider 4 sites for a public trail will ultimately be coordinated between the City of Perris and MWD and is not part of the currently proposed Project.



Source(s): Webb Associates (02-25-2020)

Figure 3-13





Source(s): Webb Associates (02-25-2020)

Figure 3-14



Conceptual Landscape Plan – Rider 4 Building

However, to meet the intent of the planned MWD trail, the Project includes an approximately 90-foot wide greenbelt along the Sinclair Street alignment (paper street), north of and outside of the MWD right-of-way. The greenbelt would include a meandering 15-foot wide decomposed granite trail and landscaping and would connect to the regional trail that would be constructed as part of the Project on the west side of the PVSD Channel. Figure 3-15 depicts the conceptual landscape plan for the linear trail and associated drainage channel to the north (PVCMDP Lateral G-2, discussed below), south of the Rider 4 site.

Screenwalls

A combination of screen walls and fencing would be provided on the Rider 2 and Rider 4 sites for screening, privacy, noise control, and security. Figure 3-16 depicts the location of the proposed walls and fences and the typical elevations, and Figure 3-17 provides line of sight sections. As shown in Figure 3-16, 14-foot-high screen wall would be provided along the perimeter of the truck trailer parking areas for each building. Five-foot high wrought iron fencing with pilasters would be provided around the detention basins in the southeast portion of the Rider 2 and Rider 4 sites, and along the eastern perimeter of the sites.

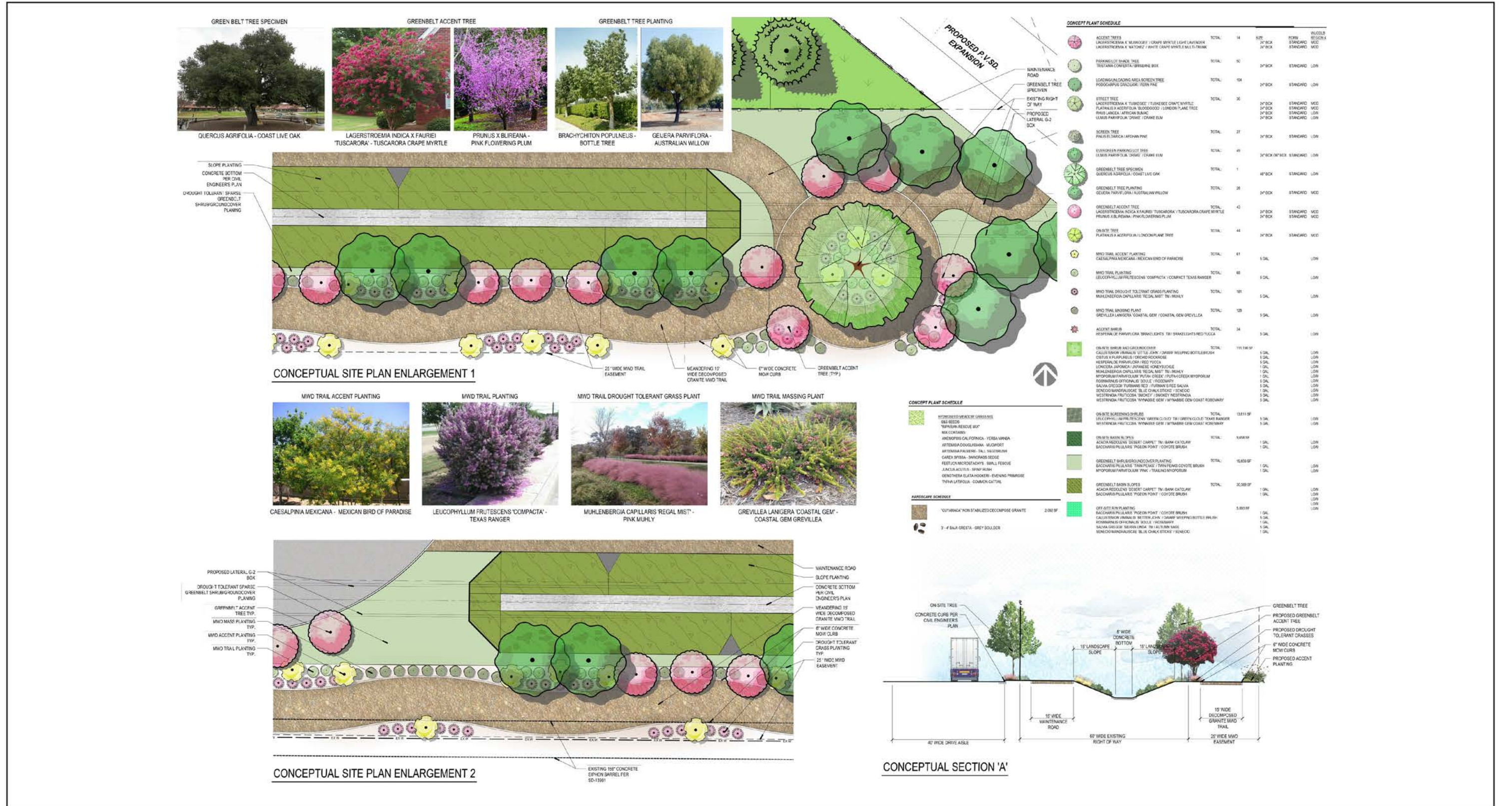
Lighting

Section 4.2.4 of the PVCCSP addresses lighting standards and guidelines, including general lighting, decorative lighting standards, and parking lot lighting. The Project would comply with applicable lighting standards and guidelines, and with lighting standards established by the City of Perris, the CalGreen Code, and the Title 24 Energy Efficiency Standards. The proposed lighting plans are provided in Figure 3-18 and Figure 3-19 for the Rider 2 and Rider 4 buildings, respectively. Consistent with provisions of the PVCCSP, the Project would include various lighting elements to ensure safety and security of the facilities. New sources of light would primarily include parking lot lighting, and outdoor security lighting for the proposed buildings. Pursuant to the PVCCSP and the City's Municipal Code Section 19.02.110, lighting would be directed away from adjoining properties and the public right-of-way.

C Utilities and Infrastructure

Section 4.2.7, *Utilities*, of the PVCCSP requires that utility connections be coordinated with the development of project sites. On-site utility infrastructure would be provided, as necessary, to serve the proposed Rider 2 and Rider 4 sites and would connect to the existing infrastructure previously installed by the Project Applicant for the Rider 3 Project, or in the adjacent roadways. No new or expanded off-site utility infrastructure is required. The required on-site utility infrastructure is within the physical impact area for the Project evaluated in this EIR. The conceptual utility infrastructure plans are depicted on the site plans provided on Figure 3-4 and Figure 3-5, and are subject to refinements during final design including specifications required by the utility provider.

- **Domestic Water.** Water services to the Project area is provided by the Eastern Municipal Water District (EMWD). There is an existing 12-inch water line located in Redlands Avenue that would serve the Rider 4 site, and a 36-inch water line in Redlands Avenue that would serve the Rider 2 site. As part of the Project, water distribution lines would be installed within the building sites to connect to the existing water lines in Redlands Avenue. These on-site facilities would be sized to

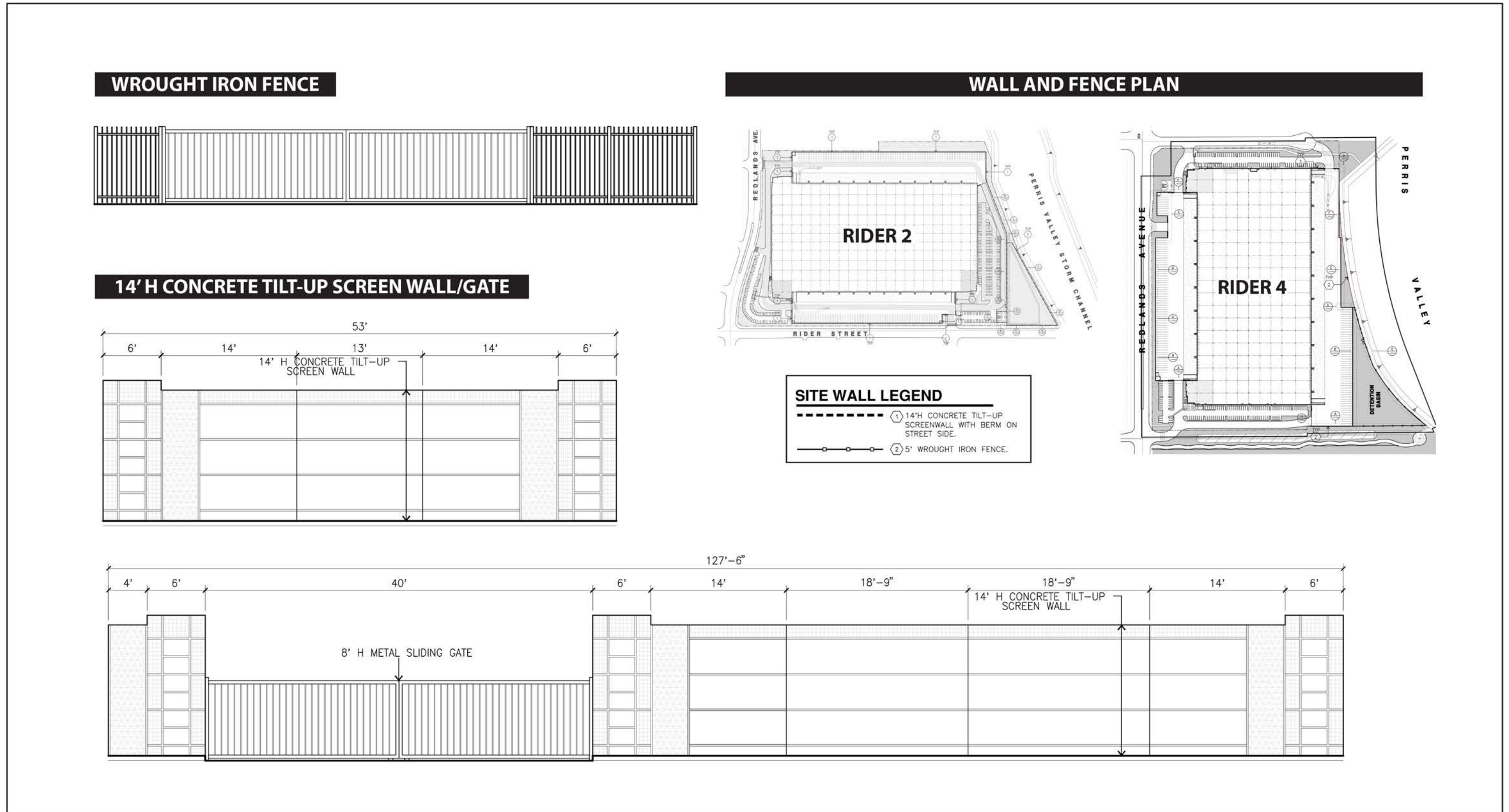


Source(s): Webb Associates (02-25-2020)

Figure 3-15

Not to Scale

Conceptual Landscape Plan – Linear Trail

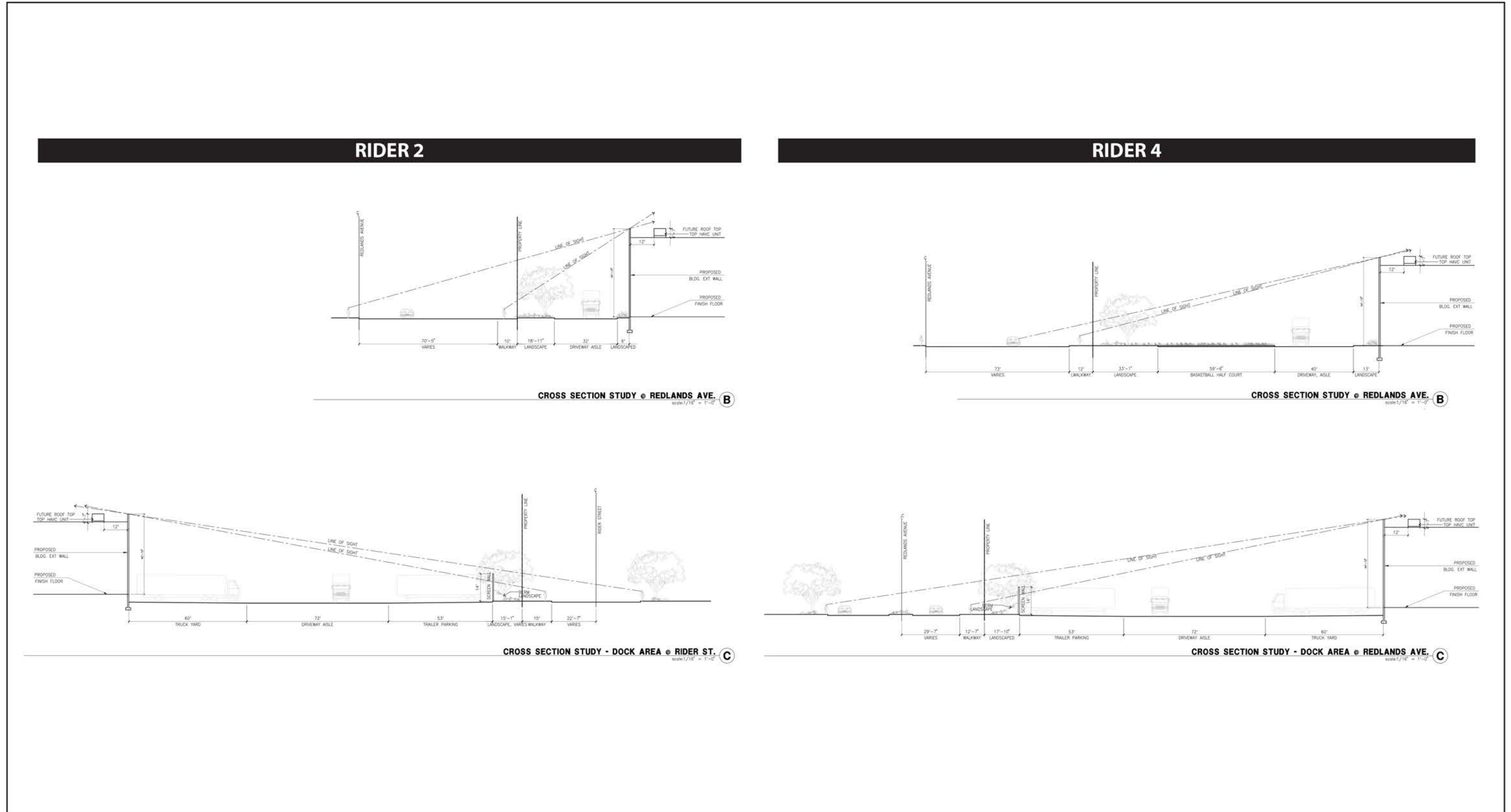


Source(s): HPA (June 2020)

Figure 3-16

Not to Scale

Typical Wall and Fence Elevations



Source(s): Webb Associates (02-18-2020)

Figure 3-17

Not to Scale

Line of Sight Sections

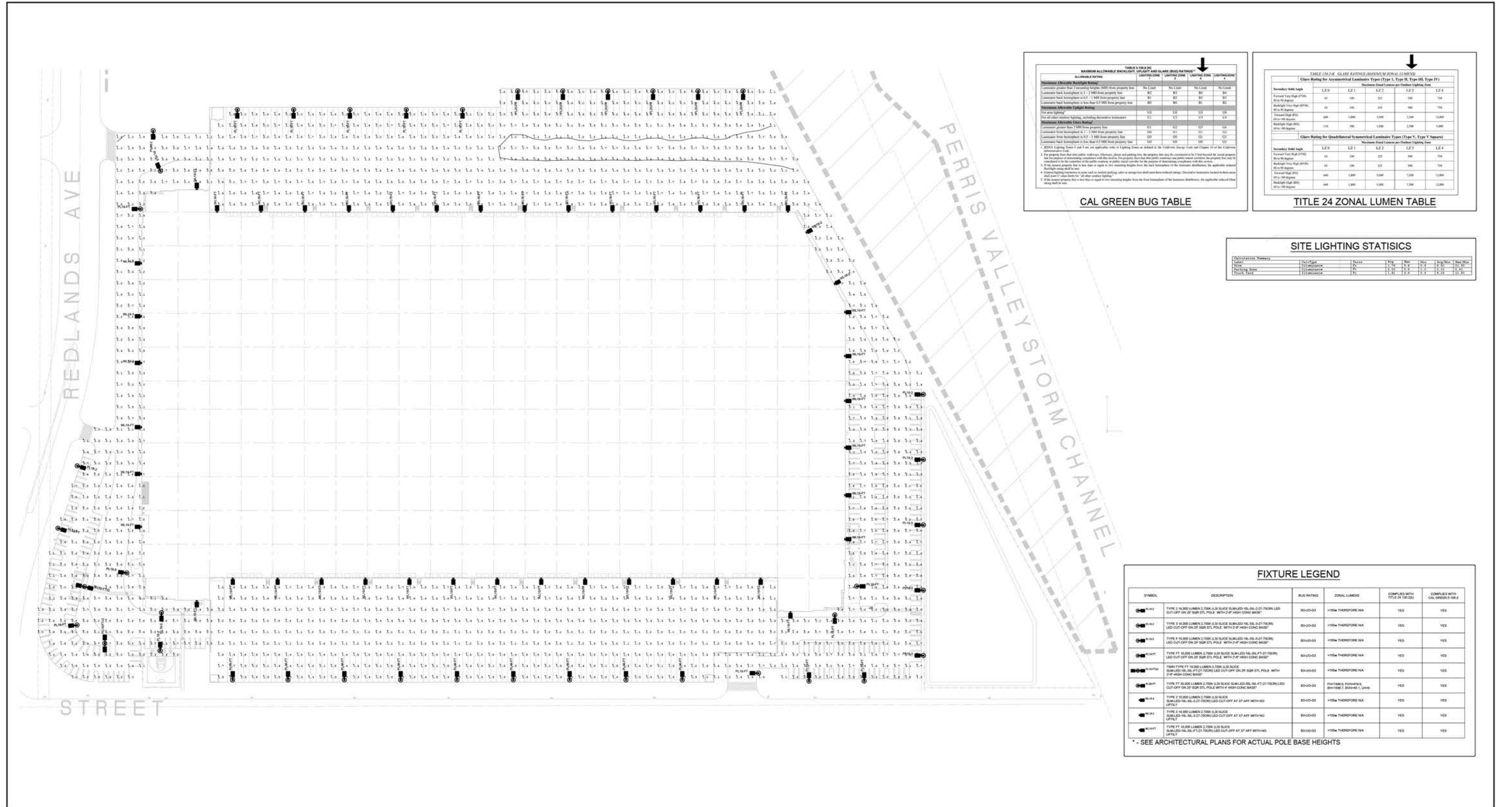
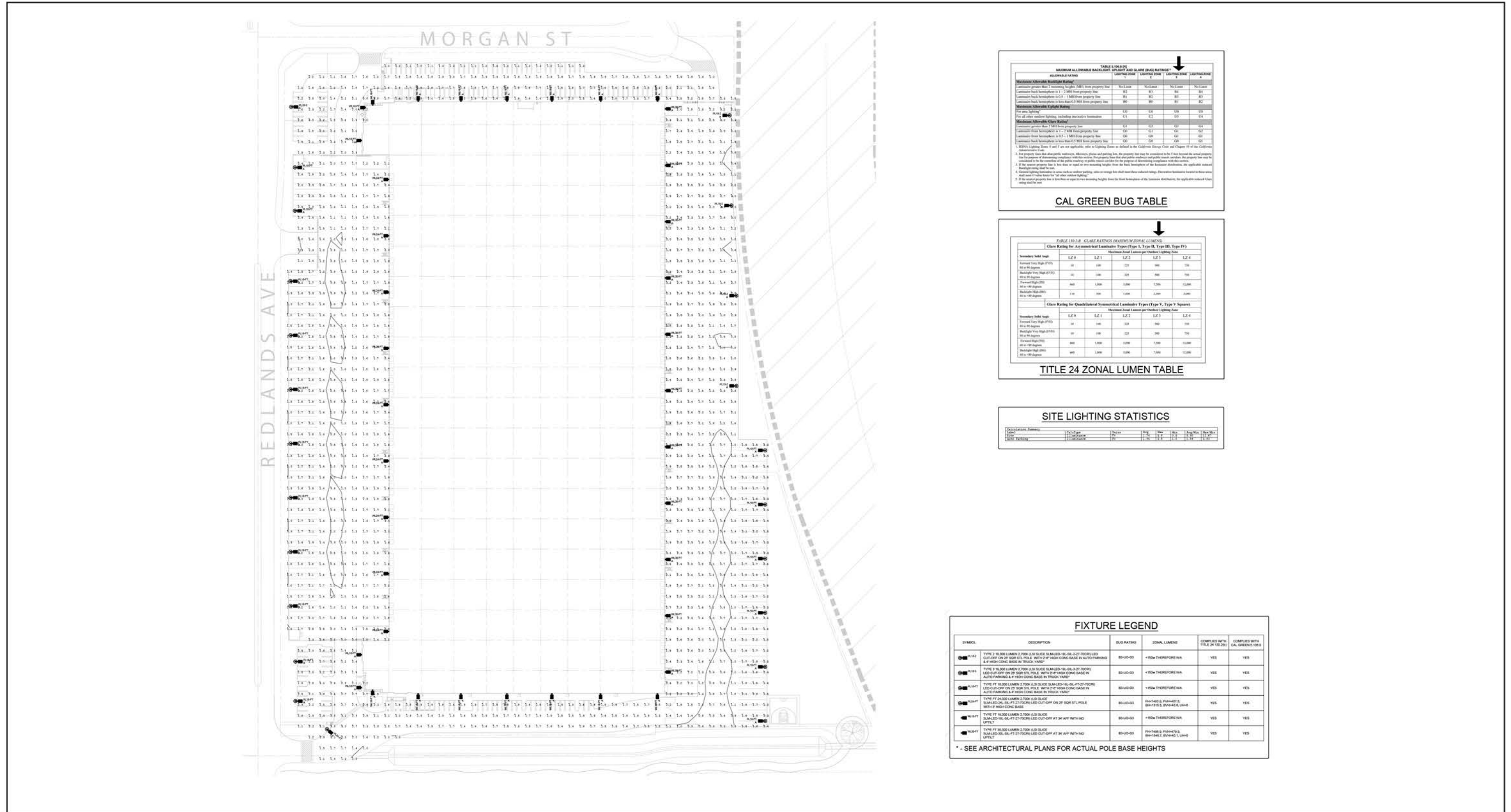


Figure 3-18

Not to Scale

Site Lighting Plan – Rider 2 Building



Source(s): Gregg Electric Inc. (05-31-2019)

Figure 3-19



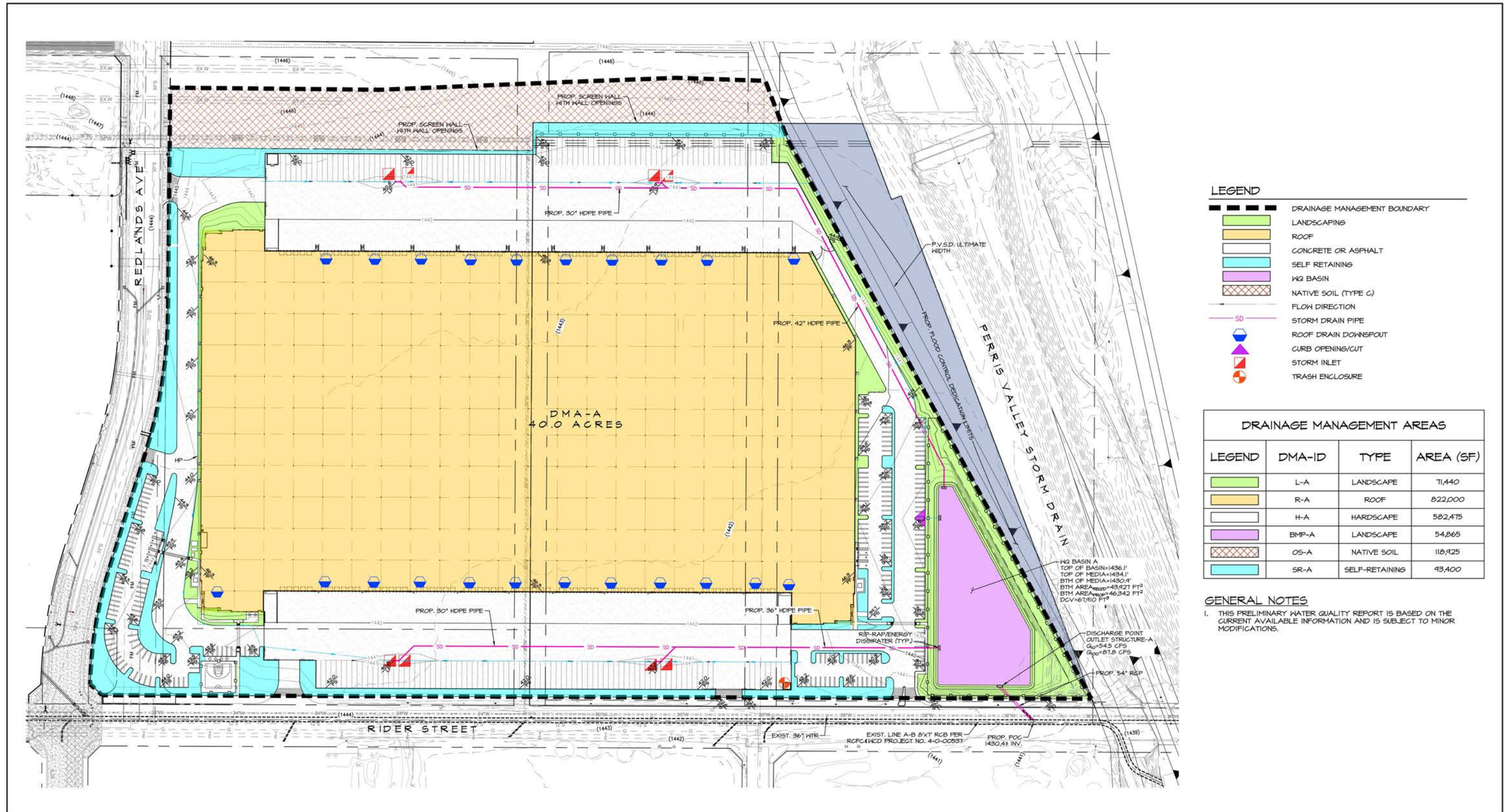
Site Lighting Plan – Rider 4 Building

accommodate the required fire flow and anticipated water demand based on the proposed land uses. The CRA extends underground within the MWD easement between the Rider 2 and Rider 4 sites and connects to the PVSD Channel. The CRA would be protected in place. Refer to the discussion provided in Section 3.6.6, below, regarding the proposed PVSD Channel improvements in relation to the CRA connection the PVSD Channel.

- **Recycled Water.** Recycled water is also provided by EMWD. There is an 8-inch recycled water line installed in Redlands Avenue that would serve both the Rider 2 and Rider 4 sites. The Project would include connections to this recycled water line to provide water for landscape irrigation within the building sites.
- **Sewer.** The EMWD is responsible for all wastewater collection and treatment in the Project area. There is an existing 33-inch sewer line in Redlands Avenue that would serve both the Rider 2 and Rider 4 sites. The Project would include installation of on-site sewer lines and sewer laterals to connect with the existing sewer line in Redlands Avenue.
- **Storm Water and Water Quality (Building Sites).** Refer to Section 3.6.2 for a description of the PVSD Channel improvements proposed as part of the Project. As further discussed in Section 4.10, Hydrology and Water Quality, of this EIR, the storm water runoff from the Rider 2 site currently sheet flows to the southeast corner of the Rider 2 site. The sheet flow discharges southeasterly towards Rider Street where a portion of the runoff pools at the southwest corner and the rest of the runoff continues to flow along Rider Street and into a catch basin at the center of the existing bridge. The Rider 2 site also receives off-site flows from north. The backbone drainage facility for this area is the existing PVCMDP storm drain Lateral A-B in Rider Street, which was designed to account for the fully developed condition of the tributary watershed it serves, including the Rider 2 site. Lateral A-B, which consists of an 8-foot by 7-foot reinforced concrete box (RCB), conveys storm water to the PVSD Channel to the east.

On-site flows generated by the development of the Rider 2 site would be collected and conveyed using a combination of surface flows, curb and gutter, ribbon gutter, grate inlets and subsurface storm drain lines (30-inch Lines A and B) to the proposed bio-retention basin in the southeast portion of the Rider 2 site (WQ Basin A) (refer to Figure 3-20, *Rider 2 Post-Construction BMP Site Map*). Area 1 and Area 2 surface flows would flow to storm drain Line A. Area 3 and Area 4 surface flows would flow to storm drain Line B. Both Line A and Line B would convey runoff flows into the proposed bio-retention basin. Area 5 sheet flows would be conveyed to a curb cut and spill into the bio-retention basin. Area OS-1 and Area OS-2 along the northern portion of the Rider 2 site would sheet flow towards the proposed screen wall. The screen wall would provide wall openings to convey off-site runoff flows from the north and incorporate these off-site flows into the on-site flows storm drain system.

WQ Basin A would treat storm water flows before conveying the flows into a proposed 54-inch reinforced concrete pipe (RCP) outlet structure, which would then discharge into PVCMDP Lateral A-B in Rider Street. WQ Basin A would utilize a 2.5-foot section of media (1.5-foot of amended soil media and 1-foot of gravel) to filter the runoff for water quality treatment. Low flows would infiltrate down through the 2.5-foot section of designed media and into the perforated underdrain



LEGEND

- DRAINAGE MANAGEMENT BOUNDARY
- LANDSCAPING
- ROOF
- CONCRETE OR ASPHALT
- SELF RETAINING
- WQ BASIN
- NATIVE SOIL (TYPE C)
- FLOW DIRECTION
- STORM DRAIN PIPE
- ROOF DRAIN DOWNSPOUT
- CURB OPENING/CUT
- STORM INLET
- TRASH ENCLOSURE

DRAINAGE MANAGEMENT AREAS

LEGEND	DMA-ID	TYPE	AREA (SF)
	L-A	LANDSCAPE	71,440
	R-A	ROOF	822,000
	H-A	HARDSCAPE	582,475
	BMP-A	LANDSCAPE	54,865
	OS-A	NATIVE SOIL	118,925
	SR-A	SELF-RETAINING	93,400

GENERAL NOTES

1. THIS PRELIMINARY WATER QUALITY REPORT IS BASED ON THE CURRENT AVAILABLE INFORMATION AND IS SUBJECT TO MINOR MODIFICATIONS.

Source(s): Webb Associates (July 2019)

Figure 3-20



Rider 2 Post-Construction BMP Site Map

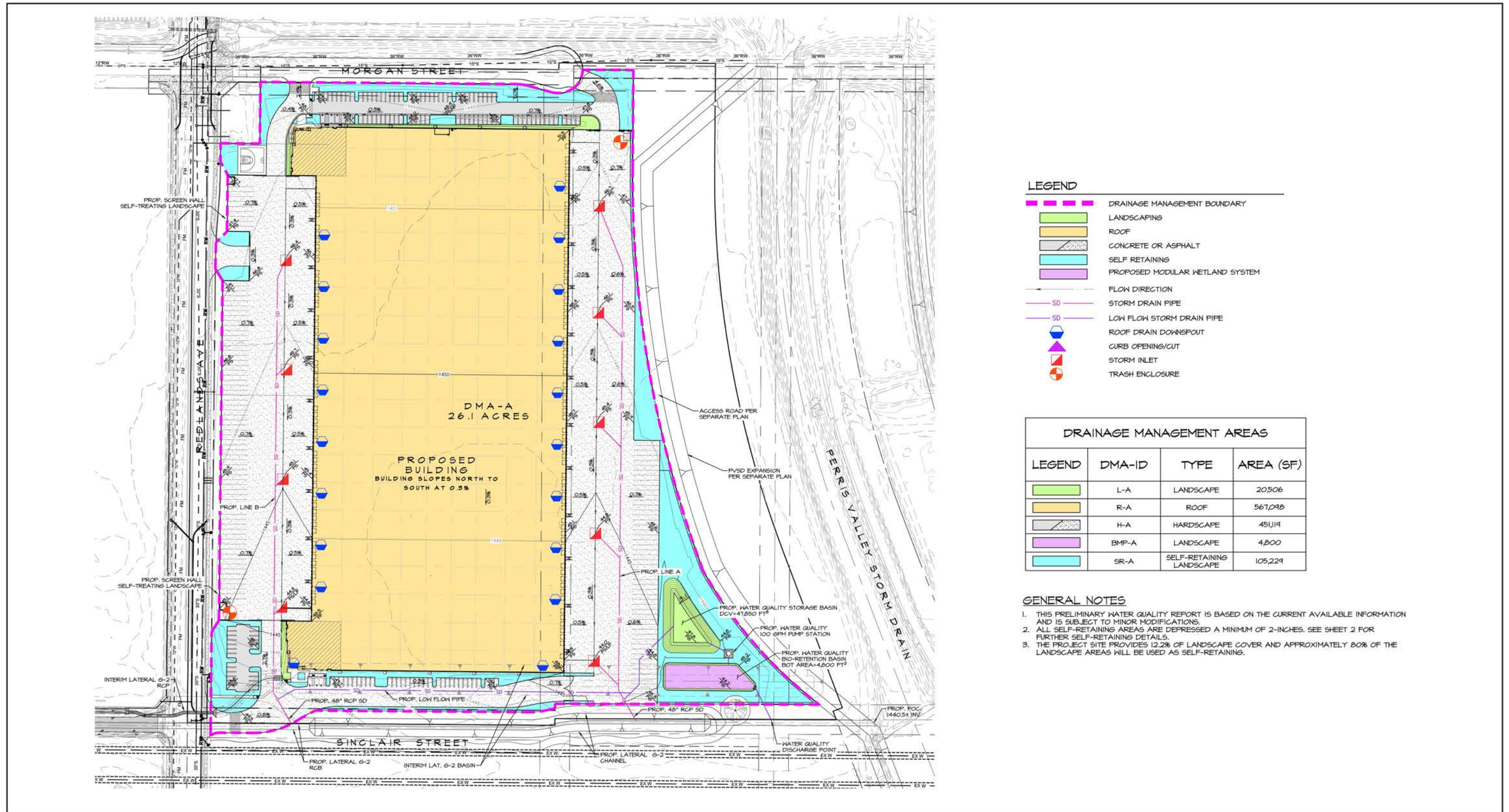
pipes within the gravel layer, which would directly discharge into the proposed outlet structure. infiltrate down through the 2.5-foot section of designed media and into the perforated underdrain pipes within the gravel layer, which would directly discharge into the proposed outlet structure. The top of grate would be 0.5 feet above the basin bottom in order to retain and treat the required water quality volume as determined in the Preliminary Water Quality Management Plan (PWQMP). The storm water runoff would pond to the water quality height of 1,435.0 before it is discharged into the proposed outlet structure.

Storm water runoff from the Rider 4 site currently sheet flows to the southeast corner of the site and into the PVSD Channel. The backbone drainage facility for this area is the planned PVCMDP storm drain Lateral G-2, which also flows to the PVSD Channel to the east. Storm water flows from the Rider 4 site would be conveyed using ribbon gutters, curb and gutters, grate inlets, and subsurface storm drain systems (Line A and Line B). Line A would convey flows from the eastern side of the Rider 4 site and Line B would convey flows from the western side of the site. As shown on Figure 3-21, *Rider 4 Post-Construction BMP Site Map*, both Line A and Line B would convey storm water flows into the modular wetlands system (MWS) located on the southeast corner of the Rider 4 site, which would provide water quality treatment. Although Line A and Line B would both drain to this single MWS, they would have different connections to the segment of Lateral G-2 that would be installed as part of the Project. For each on-site storm drain mainline, a manhole with an adverse grade pipe downstream would be placed to ensure the tributary water quality volume is retained.

The adverse grade would also connect the mainlines to the Lateral G-2 invert. Higher flows would overcome the adverse grade and discharge into Lateral G-2. Flows from the proposed MWS would drain to a proposed pump station located in the southwest corner of the site and would be pumped into an on-site vault and then gravity flow into Lateral G-2. Runoff within the Lateral G-2 storm drain line would flow east toward the PVSD Channel. Some off-site flows come from an existing ridgeline located on the south side of the project boundary in MWD right -of-way. These off-site flows would affect the area designated for the proposed linear trail. This area would be landscaped and depressed to conform to applicable water quality standards. Runoff generated from this area would also be conveyed into proposed Lateral G-2.

In addition to the site design and water quality treatment-control best management practices (BMPs) identified above (i.e., MWS and bio-retention basin), structural and non-structural source-control BMPs would be installed as part of the Project, including, but not limited to the following:

- Storm drain signage.
- Interior floor drains that are plumbed to the sanitary sewer.
- Landscape design that minimizes irrigation, runoff, and the use of fertilizers and pesticides that contribute to storm water pollution.
- Use of plants that are tolerant of saturated soil conditions in landscaped areas to be used to retain or detain storm water.
- Use of pest-resistant plants, especially adjacent to hardscape.
- Trash container storage areas paved with an impervious surface, designed not to allow



Source(s): Webb Associates (August 2019)

Figure 3-21



Rider 4 Post-Construction BMP Site Map

run-on from adjoining areas, designed to divert drainage from adjoining roofs and pavements from the surrounding area, and screened or walled to prevent off-site transport of trash.

- Leak-proof trash dumpsters with attached covers or lids.
 - Roofed trash enclosures.
 - Roofed trash compactors that are set on a concrete pad sloped to drain to the sanitary sewer line.
 - Signage posted near dumpsters to not dump hazardous materials.
 - Uncovered loading docks 4 feet above finished pavement surface.
 - Onsite spill kits.
- **Dry Utilities.** Southern California Edison (SCE) supplies electric power to the Project area, and Charter Communications supplies communications and data. The Project would include installation of on-site dry utility infrastructure to connect with the existing infrastructure. There are existing power poles along the Project perimeter that would be protected in place or relocated as part of the Project. The Project would not require natural gas for operations; therefore, no natural gas infrastructure would be installed as part of the Project.

D Operational Characteristics

At the time this EIR was prepared, the future occupants of the proposed buildings were unknown. The Project Applicant expects that the buildings would be occupied by high-cube warehouse distribution operators. The buildings are not designed to accommodate any warehouse cold storage or refrigerated uses. For purposes of evaluation in this EIR, the Project is assumed to be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night.

The buildings are designed such that business operations would be conducted within the enclosed buildings, with the exception of traffic movement, parking, and the loading, and unloading of truck trailers at designated loading bays. Infrastructure would be installed so that outdoor cargo handling equipment used during loading, and unloading of trailers (e.g., yard trucks, hostlers, yard goats, pallet jacks, forklifts) can be non-diesel powered per contemporary industry standards. As a practical matter, dock doors on warehouse buildings are not occupied by a truck at all times of the day. There are typically many more dock door positions on warehouse buildings than are needed for receiving and shipping volumes. The dock doors that are in use at any given time are usually selected based on interior building operation efficiencies. In other words, trucks ideally dock in the position closest to where the goods carried by the truck are stored inside the warehouse. As a result, many dock door positions are frequently inactive throughout the day. Pursuant to State law, on-road diesel-fueled trucks are required to comply with various air quality and greenhouse gas emission standards, including but not limited to the type of fuel used, engine model year stipulations, aerodynamic features, and idling time restrictions. Compliance with State law is mandatory and inspections of on-road diesel trucks subject to applicable State laws are conducted by the California Air Resources Board (CARB).

3.6.2 PVSD CHANNEL AND RIDER STREET BRIDGE IMPROVEMENTS

PVSD Channel Improvements

The proposed improvements to the PVSD Channel entail Phase 1 of a larger channel improvement project to accommodate 100-year storm flows, which would ultimately extend north to just past Ramona Expressway and south of Rider Street. Phase 1 of the proposed PVSD Channel improvements begin approximately 100 feet north of Morgan Street. The PVSD Channel in this area would transition to a 550-foot-wide channel. The proposed PVSD Channel right-of-way would be up to 580 feet wide and would include 15-foot wide access roads on each side until it reaches the CRA. Refer to site Section A-A and Section F-F in Figure 3-26, *Site Sections*, in Section 3.6.3, *Construction Activities*, below, which depict typical sections across the PVSD Channel. With implementation of the proposed PVSD Channel improvement the Rider 2 and Rider 4 sites would be removed from the 100-year flood plain protecting the Rider 2 and Rider 4 building sites during a 100-year storm event.

The Project has been designed to protect the CRA. The CRA would have a concrete lined channel section constructed over the facility. The PVSD Channel would be aligned such that the existing manhole structures would be avoided and can remain protected in place. At the upstream and downstream ends of the concrete lining, cutoff walls would be constructed to protect against scour and channel degradation. Downstream of the CRA, the PVSD Channel would be deepened and would transition with an engineered drop structure at the MWD easement to a 440-foot-wide channel with a 56-foot-wide by 5-foot-deep low flow channel. In this area, the proposed PVSD Channel right-of-way would be 495 feet wide. As discussed in Section 3.7, *Summary of Requested Actions*, MWD is a responsible agency and will have to take discretionary actions in order for the PVSD Channel improvements to be installed. The PVSD Channel would be earthen except in the vicinity of the engineered drop structure and Rider Street bridge, where it would have concrete side slopes. Erosion protection features would be installed, and existing storm drain inlets that tie into the PVSD Channel would be reconstructed as part of the Project.

As conceptually shown on Figure 3-3, and shown in site Section FF, 15-foot wide access roads on each side of the channel. The eastern access road would also serve as a regional trail, consistent with the PVCCSP, and would replace the existing trail that currently extends along the eastern side of the PVSD Channel and connects to Morgan Park northeast of the Project area.

Rider Street Bridge Improvements

As previously discussed, the existing Rider Street bridge (State Bridge No. 56C0536) over the PVSD Channel was constructed in 2005 and is a cast-in-place RCB structure. The RCB structure consists of five 7-foot deep by 14-foot wide open cells with one-foot thick walls. The bridge is approximately 81.4 feet long measured along the street, and the RCB is approximately 83.3 feet wide along the PVSD channel, and carries a roadway curb-to-curb width of 64-feet, with two 6-foot wide sidewalks. The structure was constructed to match the ultimate General Plan condition of two traffic lanes in each direction and a median while the bridge deck is currently striped with one lane in each direction and a median.

The proposed widening of the PVSD Channel would also require replacing the existing bridge with a longer bridge over the Channel. Because the Project area is generally flat, a "low profile" structure involving relatively shallow girder types is appropriate. The design intention is to not substantially raise

the roadway profile while maintaining a proper hydraulic freeboard (i.e., vertical clearance) between the bottom of the superstructure girder and water surface of the 100-year design flood. Because pier supports are an obstruction to the flood, the proposed bridge would have a minimum amount of pier supports in the channel, and no pier supports would be provided in the middle low-flow area of the channel to reduce impacts to jurisdictional areas.

Based on the preliminary hydraulic and roadway geometric settings, the proposed bridge would be a 5-span continuous slab structure, 260 feet long and 78 feet 6 inches wide. There would be four piers in the channel and two abutments at the banks. The bridge would consist of pre-cast (i.e., prefabricated in a shop plant and assembled at the job site) pre-stressed (PC/PS) voided concrete slab(s).

Six 30-inch diameter cast-in-drilled-hole concrete piles would support the abutments and pier columns.

The new bridge would be built in one or two stages (half by half), to be determined by the City. As further discussed in Section 3.6.3, *Construction Activities*, below, if the bridge is constructed in one stage, Rider Street would be closed at this location, and traffic would be detoured until the bridge is subsequently constructed. If the bridge is built in two stages, the construction process would take longer due to the need to implement traffic controls to maintain traffic flow across the half of the bridge that remains open, installation of shoring between construction stages, installation of temporary flow diversion in the Channel, repeated mobilization of construction equipment, and construction restrictions through a "wet" rainy season when equipment is not allowed in the Channel.

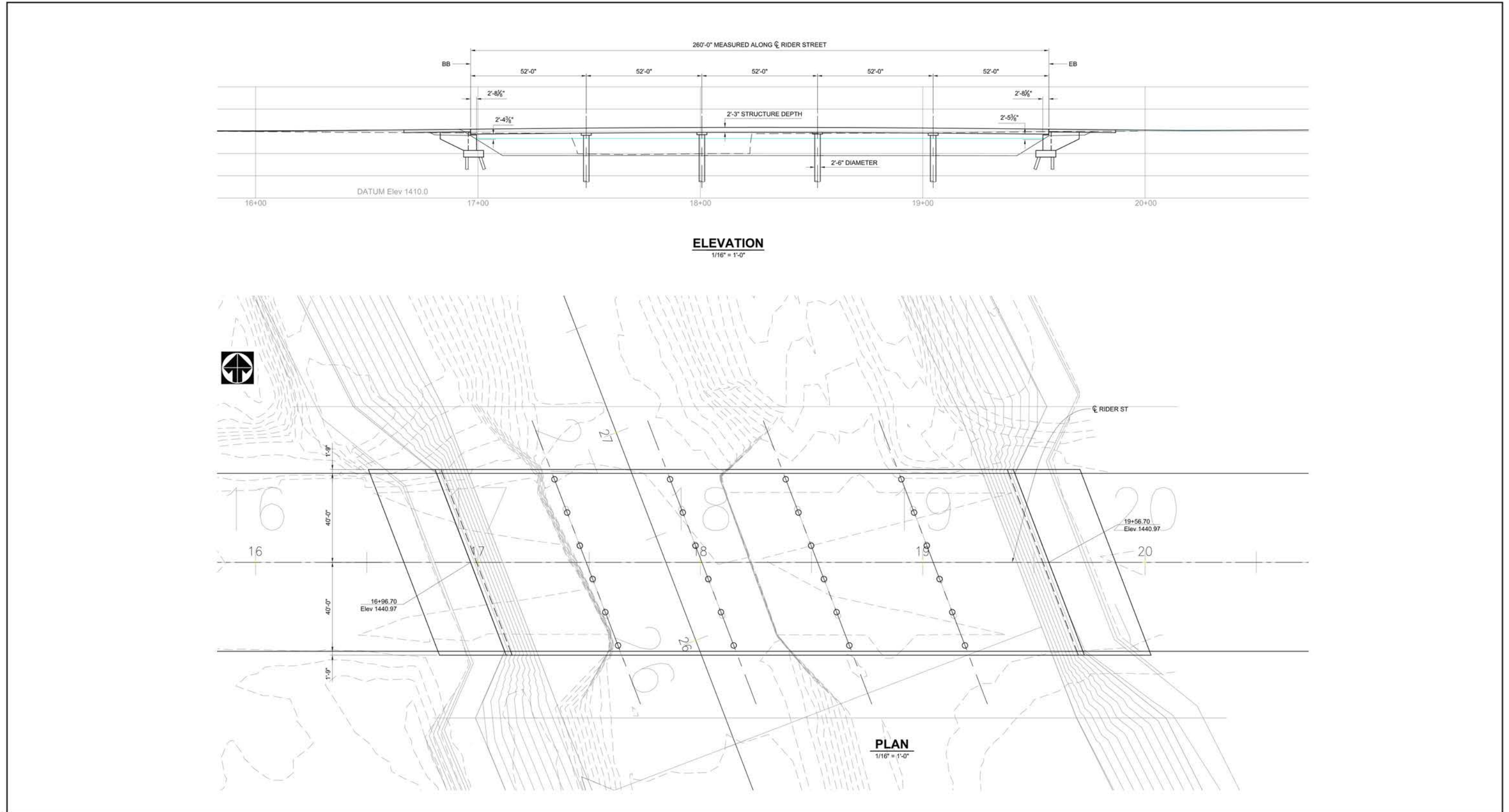
3.6.3 CONSTRUCTION ACTIVITIES

It is estimated that construction of the Project and PVSD Channel improvements would occur over an approximate 14-month period. If the Rider Street bridge is constructed in one stage, it would occur during this same construction period, while construction of the Rider Street bridge in two stages would extend the overall construction period by five months. The estimated construction phase durations, which are also used for purposes of analysis in this EIR, are summarized in Table 3-2, *Estimated Construction Duration – One Stage Bridge Construction*, and Table 3-3, *Estimated Construction Duration – Two Stage Bridge Construction*.

This construction schedule represents a "worst-case" analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.⁶ The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines.

Based on the estimated construction schedule, excavation the PVSD Channel would occur first followed by construction activities for the Rider Street bridge and the Rider 2 and Rider 4 buildings; the Rider Street bridge construction activities would overlap with the Rider 2 and 4 building construction activities. The excavated soils from the PVSD Channel would be placed on the Rider 2 and Rider 4 sites to elevate

⁶ As shown in the CalEEMod User's Guide Version 2016.3.2, Section 4.3 "OFFROAD Equipment" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.



Source(s): CNS Engineers, Inc. (02-14-2020)

Figure 3-22

Not to Scale

Rider Street Bridge Conceptual Plan and Elevations

the sites above the 100-year flood plain. The soils would be moved from the Channel to the building sites using scrapers, which would eliminate the need for heavy trucks to haul the soil. It is estimated that the Project would require approximately 180,000 cubic yards of earth work.

Table 3-2 Estimated Construction Duration – One Stage Bridge Construction

Channel Excavation	Start Date	End Date	No. Days
PVSD Channel Excavation/Grading	10/5/2020	11/30/2020	41
<i>Total Months of Construction (Channel Widening - Grading)</i>			1
PVSD Channel Improvements - Rider Bridge Construction (One Stage)	Start Date	End Date	No. Days
Detouring Traffic/Street Closure	12/1/2020	12/7/2020	5
Grubbing/Land Clearing	12/8/2020	12/19/2020	9
Grading/Excavation/Removing Existing Bridge	12/20/2020	2/14/2021	40
Bridge Construction	2/15/2021	11/5/2021	190
Drainage/Utilities/Sub-Grade	7/30/2021	9/16/2021	35
Paving	8/26/2021	9/16/2021	16
<i>Total Months of Construction (Channel Widening – Bridge Construction)</i>			9
Rider 2 & 4 Building Construction	Start Date	End Date	No. Days
Site Preparation	12/1/2020	12/28/2020	20
Grading	12/29/2020	2/22/2021	40
Building Construction	2/23/2021	9/27/2021	155
Paving	9/28/2021	12/27/2021	65
Architectural Coating	11/2/2021	12/27/2021	40
<i>Total Months of Construction (Rider 2 & 4 Construction)</i>			12
Total Months of Construction			14

Prior to receiving the soil from the PVSD Channel, the Rider 2 and Rider 4 sites would be cleared and overexcavated per the recommendations of the Project-specific geotechnical investigations, as further discussed in Section 4.7, Geology and Soils, of this EIR. The overall conceptual grading and drainage plan for the Project is provided in Figure 3-23; grading and drainage plans for the Rider and Rider 4 sites and adjacent PVSD Channel are provided in Figure 3-24 and Figure 3-25; and, site sections are presented in Figure 3-26.

As shown in Table 3-2 and Table 3-3 the sequence of construction activities for the Rider Street bridge construction would vary depending on whether the bridge is built in one, or two, stages. These construction phases are further outlined in Table 3-4, *Rider Street Bridge Construction Scenarios*. Table 3-5, *Overlap of Construction Activities (One-Stage Bridge Construction)* and Table 3-6, *Overlap of Construction Activities (Two-Stage Bridge Construction)* further demonstrate the overlapping construction activities.

Table 3-3 Estimated Construction Duration – Two Stage Bridge Construction

Channel Excavation	Start Date	End Date	No. Days
PVSD Channel Excavation/Grading	10/5/2020	11/30/2020	41
<i>Total Months of Construction (Channel Widening - Grading)</i>			<i>1</i>
PVSD Channel Improvements - Rider Bridge Construction (Two Stages)	Start Date	End Date	No. Days
Implementing Traffic Controls	12/1/2020	12/7/2020	5
Grubbing/Land Clearing	12/8/2020	12/21/2020	10
Stage 1 Grading/Excavation/Removing Portion of the Existing Bridge	12/22/2020	2/1/2021	30
Stage 1 Bridge Construction	2/15/2021	7/15/2021	109
Implementing Traffic Controls (Shifting Traffic)	7/16/2021	7/21/2021	4
Stage 2 Grading/Excavation/Removing Portion of the Existing Bridge	7/22/2021	9/1/2021	30
Stage 2 Bridge Construction	9/2/2021	3/12/2022	137
Drainage/Utilities/Sub-Grade	3/13/2022	4/12/2022	22
Paving	4/12/2022	5/2/2022	15
<i>Total Months of Construction (Channel Widening – Bridge Construction)</i>			<i>17</i>
Rider 2 & 4 Building Construction	Start Date	End Date	No. Days
Site Preparation	12/1/2020	12/28/2020	20
Grading	12/29/2020	2/22/2021	40
Building Construction	2/23/2021	9/27/2021	155
Paving	9/28/2021	12/27/2021	65
Architectural Coating	11/2/2021	12/27/2021	40
<i>Total Months of Construction (Rider 2 & 4 Construction)</i>			<i>12</i>
Total Months of Construction			19

DEVELOPMENT PLAN REVIEW NO. 19-0004 IDI LOGISTICS - RIDER II & IV CONCEPTUAL GRADING & DRAINAGE PLAN

RIDER II APN
303-170-004, 303-170-005, 303-170-011, 303-170-014,
303-130-022

RIDER II PROJECT DATA

ACREAGE	1,701.08 S.F.	39.05 AC.
GROSS SITE AREA	43,372 S.F.	1.0 AC.
VACATION AREA	21,895 S.F.	0.67 AC.
R/W DEDICATION	51,256 S.F.	1.19 AC.
PVSD CHANNEL DEDICATION	1,644.12 S.F.	38.33 AC.
NET SITE AREA		

BUILDING AREA	10,000 S.F.
OFFICE	734,751 S.F.
WAREHOUSE	804,751 S.F.
TOTAL AREA	

F.A.R. 804,751 SF/162,411 SF = 0.50 F.A.R.

LOT COVERAGE PROPOSED: 41.7% MAX. ALLOWED: 50%

PARKING REQUIREMENTS

WAREHOUSE	1 STALLS
1ST. 20K @ 1/2000 S.F.	20 STALLS
2ND. 20K @ 1/2000 S.F.	10 STALLS
ABOVE. 40K @ 1/2000 S.F.	83 STALLS
TOTAL PARKINGS REQUIRED	113 STALLS

*OFFICE AREA IS LESS THAN 10% OF THE TOTAL GROSS SQUARE FOOTAGE OF THE BUILDING AND DOES NOT REQUIRE SEPARATE CALCULATION.

PARKING PROVIDED

AUTO	
STANDARD (9'X19')	268 STALLS
HANDICAP (9'X19')	7 STALLS
VAN ACCESSIBLE (12'X19')	2 STALLS
CLEAN AIR/VAN POOL (10'X19'X13')	30 STALLS
TOTAL AUTO	307 STALLS
TRAILER (10'X37) PROVIDED	136 STALLS

LANDSCAPED AREA

LANDSCAPED AREA REQUIRED	12%
LANDSCAPED AREA PROVIDED	14%
LANDSCAPED AREA PROVIDED	229,261 S.F.

LEGAL DESCRIPTION

PARCEL A:
LOTS "A" THROUGH "D", INCLUSIVE, IN BLOCK 5; LOTS "A" THROUGH "D", INCLUSIVE, IN BLOCK 6; LOTS "C" AND "D" IN BLOCK 4, ALL IN TRACT II OF FAIRVIEW FARMS NO. 5, AS SHOWN BY MAP ON FILE IN BOOK 16, PAGE 20 OF MAPS, RIVERSIDE COUNTY RECORDS.

EXCEPTING THEREFROM THAT PORTION WHICH LIES EASTERLY OF THE WESTERLY LINE OF THE PARCEL OF LAND CONVEYED TO RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT BY DEED RECORDED APRIL 8, 1955, IN BOOK 1720 PAGE 239 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

ALSO EXCEPTING ANY PORTION INCLUDED IN THAT CERTAIN PARCEL OF LAND CONDEMNED BY METROPOLITAN WATER DISTRICT BY DECREE OF CONDEMNATION, A CERTIFIED COPY OF WHICH WAS RECORDED DECEMBER 21, 1935 IN BOOK 263, PAGE 244 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

PARCEL B:
LOTS "A" THROUGH "E", INCLUSIVE, IN BLOCK 6; LOTS @A THROUGH "E", INCLUSIVE, IN BLOCK 7; LOTS "A" THROUGH "D", INCLUSIVE, IN BLOCK 8; THE SOUTH HALF OF LOT "B" IN BLOCK 5; AND LOTS "C" AND "D" IN BLOCK 5, ALL IN TRACT 12 OF FAIRVIEW FARMS NO. 5, AS SHOWN BY MAP ON FILE IN BOOK 16, PAGE 20 OF MAPS, RIVERSIDE COUNTY RECORDS.

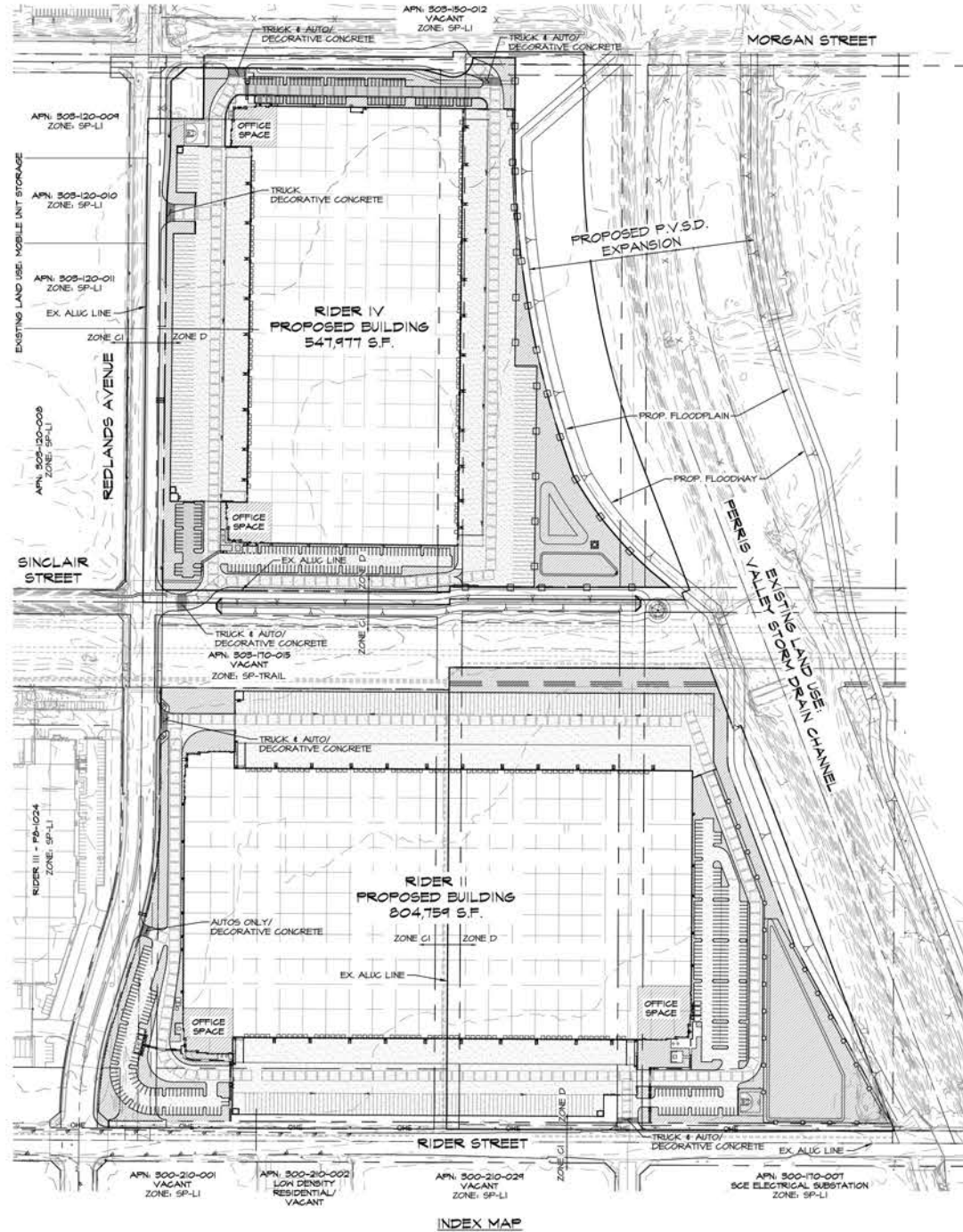
EXCEPTING THEREFROM THAT PORTION WHICH LIES EASTERLY OF THE WESTERLY LINE OF THE PARCEL OF LAND CONVEYED TO RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT BY DEED RECORDED APRIL 8, 1955, IN BOOK 1720 PAGE 239 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

ALSO EXCEPTING ANY PORTION INCLUDED IN THAT CERTAIN PARCEL OF LAND CONDEMNED BY METROPOLITAN WATER DISTRICT BY DECREE OF CONDEMNATION, A CERTIFIED COPY OF WHICH WAS RECORDED DECEMBER 21, 1935 IN BOOK 263, PAGE 244 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

APN: 303-170-004-4 (Affects Parcel A) and 303-170-005-5 (Affects Parcel B)

SHEET INDEX

INDEX MAP	SHEET 1
DETAILS AND SECTIONS	SHEET 2
RIDER II CONCEPTUAL GRADING	SHEET 3
RIDER IV CONCEPTUAL GRADING	SHEET 4



RIDER IV APN
303-160-002, 303-160-003, 303-160-007, 303-160-004

RIDER IV PROJECT DATA

ACREAGE	1,461,542 S.F.	33.04 AC.
R/W DEDICATION	133,423 S.F.	2.62 AC.
PVSD DEDICATION	2,071,893 S.F.	4.71 AC.
NET SITE AREA	1,526,222 S.F.	26.45 AC.

BUILDING AREA	507,471 S.F.
WAREHOUSE	507,471 S.F.
OFFICE	10,000 S.F.
TOTAL AREA	547,471 S.F.

F.A.R. 547,471 SF/1,441,737 SF = 0.41 F.A.R.

LOT COVERAGE PROPOSED: 41.7% MAX. ALLOWED: 50%

PARKING REQUIREMENTS

1ST. 20K @ 1/2000 S.F.	20 STALLS
2ND. 20K @ 1/2000 S.F.	10 STALLS
ABOVE. 40K @ 1/2000 S.F.	102 STALLS
TOTAL PARKINGS REQUIRED	132 STALLS

*PARKING FOR OFFICE AREA COMPRISING LESS THAN 10% OF THE TOTAL GROSS SQUARE FOOTAGE OF THE BUILDING SHALL BE INCLUDED IN THIS CALCULATION.

PARKING PROVIDED

AUTO	
STANDARD (9'X19')	190 STALLS
VAN ACCESSIBLE (12'X19')	1 STALLS
CLEAN AIR/VAN POOL	11 STALLS
ACCESSIBLE (9'X19')	5 STALLS
TOTAL	207 STALLS
TRAILER	
STANDARD (10'X37)	121 STALLS

LANDSCAPED AREA

LANDSCAPED AREA REQUIRED	12.0%
LANDSCAPED AREA PROVIDED	12.2%
LANDSCAPED AREA PROVIDED	184,155 S.F.

LEGAL DESCRIPTION

PARCEL 1:
LOTS "A" THROUGH "D", INCLUSIVE, IN BLOCK 1; LOTS "A" THROUGH "D", INCLUSIVE, IN BLOCK 2; LOTS "A" THROUGH "D", INCLUSIVE, IN BLOCK 3, ALL IN TRACT II, AND LOTS "A" THROUGH "D", INCLUSIVE, IN BLOCK 4, IN TRACT 12 OF FAIRVIEW FARMS NO. 5, AS SHOWN BY MAP ON FILE IN BOOK 16, PAGE 20 OF MAPS, RIVERSIDE COUNTY RECORDS.

EXCEPTING THEREFROM THAT PORTION WHICH LIES EASTERLY OF THE WESTERLY LINE OF THE PARCEL OF LAND CONVEYED TO RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT BY DEED RECORDED APRIL 8, 1955 IN BOOK 1720, PAGE 239 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

ALSO EXCEPTING ANY PORTION INCLUDED IN THAT CERTAIN PARCEL OF LAND CONDEMNED BY METROPOLITAN WATER DISTRICT BY DECREE OF CONDEMNATION, A CERTIFIED COPY OF WHICH WAS RECORDED DECEMBER 21, 1935 IN BOOK 263, PAGE 244 OF OFFICIAL RECORDS, RIVERSIDE COUNTY RECORDS.

PARCEL 2:
LOTS 1 AND 2 IN BLOCK 14 OF RIVERSIDE TRACT AS SHOWN BY MAP ON FILE IN BOOK 14, PAGE 668 OF MAPS, SAN DIEGO COUNTY RECORDS.

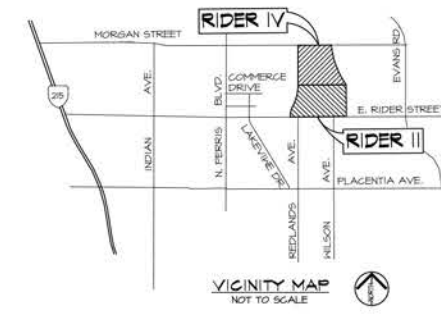
EXCEPTING THEREFROM THAT PORTION OF LOT 1 IS CONVEYED TO COUNTY OF RIVERSIDE, A BODY CORPORATE AND POLITIC BY DEED RECORDED ON JANUARY 02, 1991 AS INSTRUMENT 41-106 OF OFFICIAL RECORDS AND THE SAME PORTION OF LAND IS OUTCLAIMED TO EASTERN MUNICIPAL WATER DISTRICT BY DEED RECORDED ON APRIL 16, 1992 AS INSTRUMENT NO. 1992-136034 OF OFFICIAL RECORDS.

LAND USE

EXISTING/PROPOSED ZONING	SP-LI
EXISTING/PROPOSED GENERAL PLAN USE	SP-LI
EXISTING LAND USE	VACANT
PROPOSED LAND USE	WAREHOUSE DISTRIBUTION

PROJECT DESCRIPTION:

DEVELOPMENT PLAN REVIEW FOR A DISTRIBUTION WAREHOUSE FACILITY CONSISTING OF 1 BUILDINGS TOTALING 806,951 SQUARE FEET ON 37.24 NET ACRES (RIDER II), AND 1 BUILDING TOTALING 507,048 SQUARE FEET ON 26.1 NET ACRES (RIDER IV).



OWNER/APPLICANT
IDI LOGISTICS
ATTN: STEVE HOLLIS
8 CORPORATE PARK, SUITE 300
IRVINE, CA 92618
TEL: (949) 351-1243

UTILITY COMPANIES:
WATER: EASTERN MUNICIPAL WATER DISTRICT
PHONE: (800) 426-3643
SEWER: EASTERN MUNICIPAL WATER DISTRICT
PHONE: (800) 426-3643
ELECTRIC: SOUTHERN CALIFORNIA EDISON COMPANY
PHONE: (800) 684-8123
TELEPHONE: CHARTER COMMUNICATIONS
PHONE: (833) 644-1254
GAS: SOUTHERN CALIFORNIA GAS COMPANY
PHONE: (800) 421-2200
SCHOOL: VAL VERDE UNIFIED SCHOOL DISTRICT
PHONE: (951) 940-6100

- NOTES:**
- 2005 THOMAS BROTHERS MAP, PAGE TTT, GRIDS H-2, H-3, J-2 & J-3.
 - THIS AREA IS SUBJECT TO MODERATE LIQUEFACTION.
 - THIS AREA IS WITHIN THE FERRIS VALLEY COMMERCE SPECIFIC PLAN.
 - THIS PROJECT IS NOT WITHIN A COMMUNITY SERVICES DISTRICT.
 - THIS PROJECT IS WITHIN THE AIRPORT COMPATIBILITY ZONE C-1 & D.
 - PROJECT BOUNDARIES WILL BE CREATED VIA PARCEL MERGER.
 - ALL PARCELS WITHIN PROJECT BOUNDARY TO BE COMBINED VIA FUTURE CERTIFICATE OF PARCEL MERGER.

LEGEND

[Symbol]	PROPOSED CONCRETE PAVEMENT	[Symbol]	FINISHED FLOOR
[Symbol]	PROPOSED LANDSCAPE AREA	[Symbol]	FINISHED GROUND
[Symbol]	PROPOSED DECORATIVE PAVEMENT	[Symbol]	FINISHED SURFACE
[Symbol]	FIRE ACCESS LANE	[Symbol]	FLOW LINE
[Symbol]	ADA PATH OF TRAVEL	[Symbol]	GRADE BREAK
[Symbol]	SCREEN WALL	[Symbol]	INVERT
[Symbol]	FENCE LINE	[Symbol]	LANDSCAPE AREA
[Symbol]	GRADEBREAK/RIDGELINE	[Symbol]	LOW POINT
[Symbol]	FLOWLINE	[Symbol]	MAXIMUM
[Symbol]	FIRE LINE	[Symbol]	PROPERTY LINE
[Symbol]	FIRE LINE	[Symbol]	RIGHT OF WAY
[Symbol]	EXISTING CONTOURS	[Symbol]	TYPICAL DRIVEWAY
[Symbol]	PROPOSED CONTOURS	[Symbol]	
[Symbol]	EXISTING WATER LINE	[Symbol]	
[Symbol]	EXISTING SEWER LINE	[Symbol]	
[Symbol]	EXISTING STORM DRAIN	[Symbol]	
[Symbol]	EXISTING GAS LINE	[Symbol]	
[Symbol]	EXISTING ELECTRICAL LINE	[Symbol]	

EARTHWORK ESTIMATE:

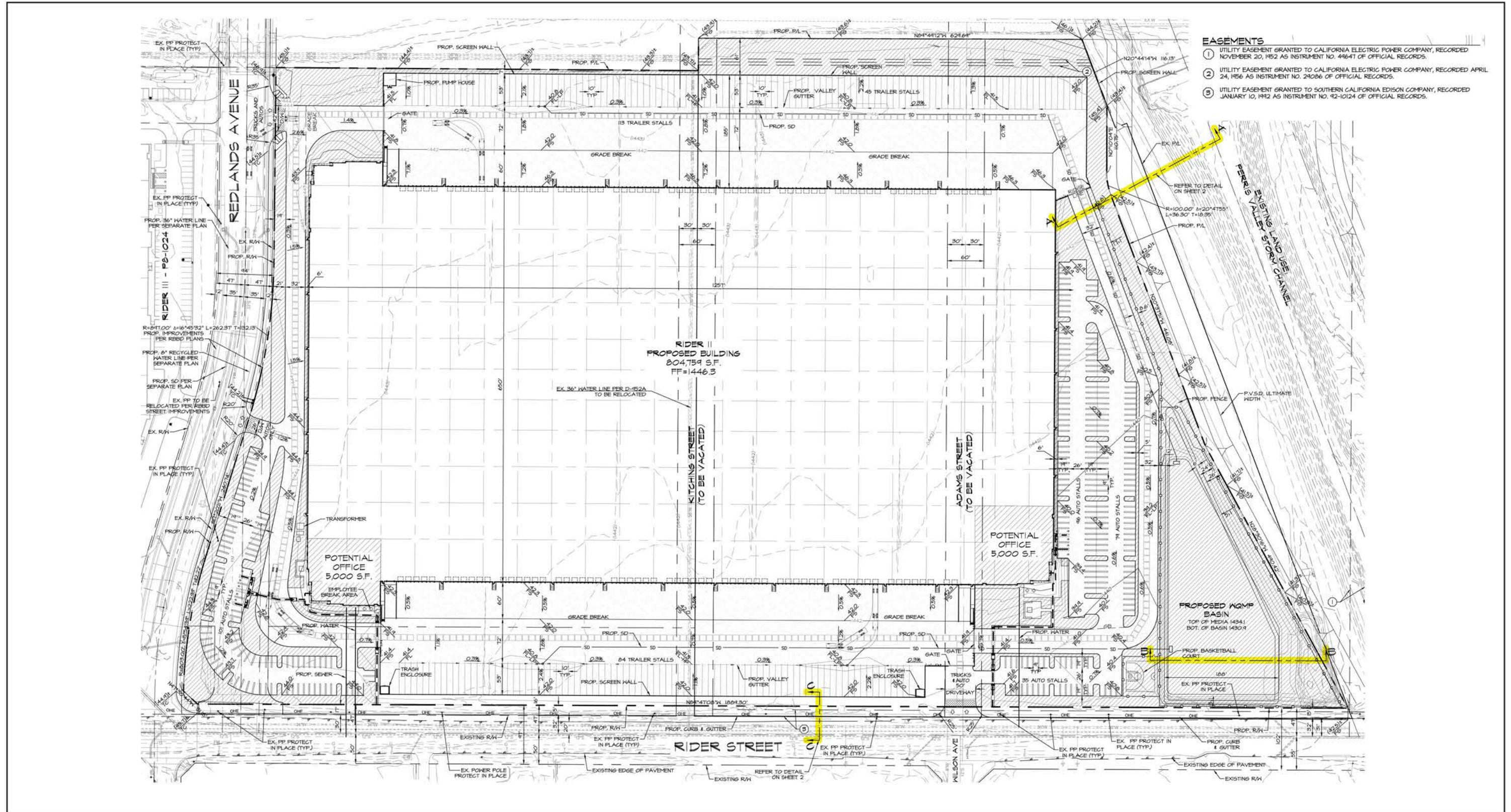
RIDER II	
CUT:	141,800 CY
FILL:	144,620 CY
SHRINKAGE:	(8,500 CY)
NET:	177,920 CY (IMPORT)
RIDER IV	
CUT:	107,180 CY
FILL:	235,300 CY
SHRINKAGE:	(14,760 CY)
NET:	142,680 CY (IMPORT)
COMBINED TOTAL:	180,000 CY (IMPORT)

*IMPORT MATERIAL TO BE OBTAINED FROM FERRIS VALLEY STORM DRAIN CHANNEL WIDENING

Source(s): Webb Associates (03-05-2020)



Figure 3-23

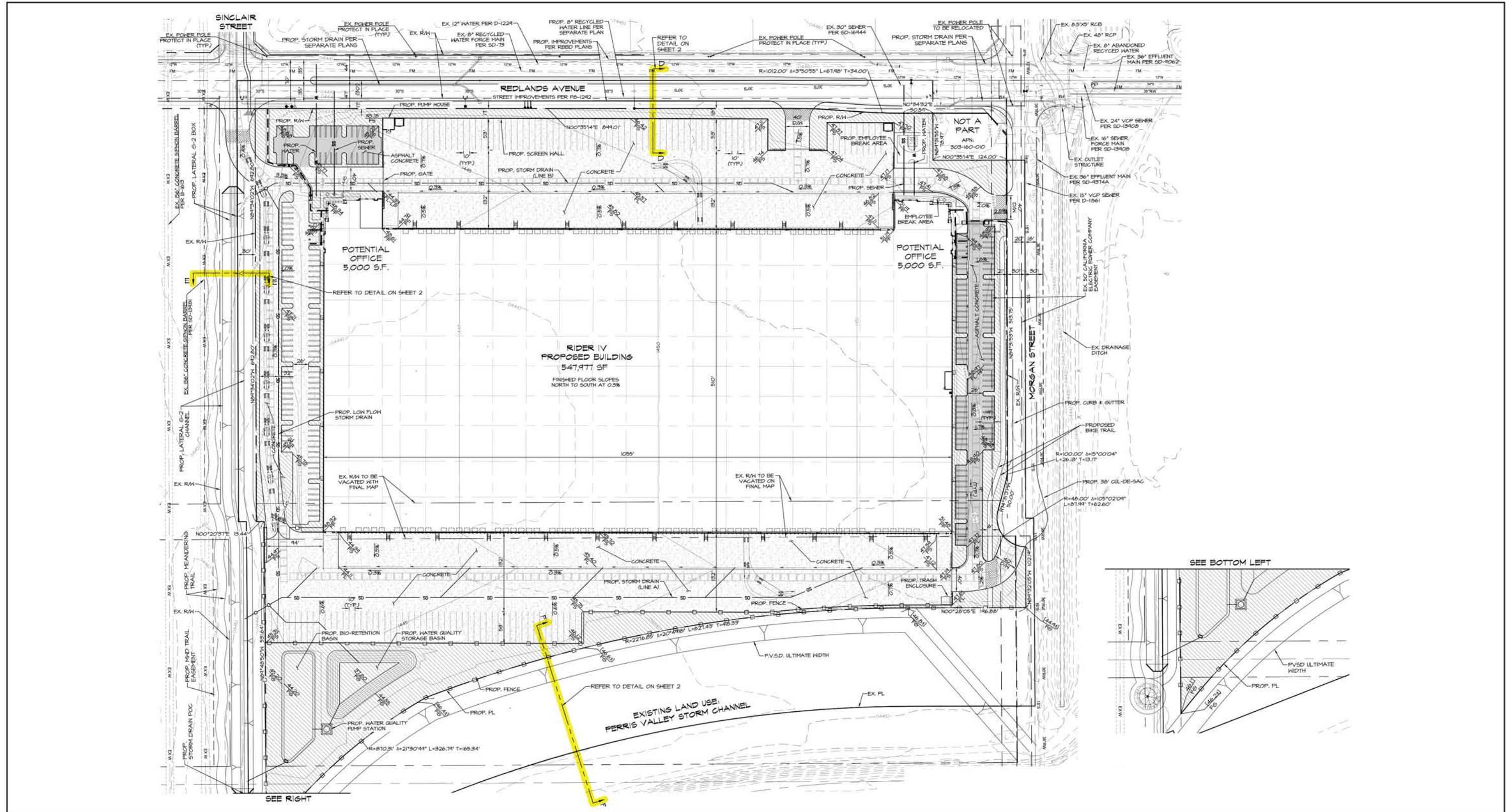


Source(s): Webb Associates (03-11-2020)

Figure 3-24



Conceptual Grading and Drainage Plan – Rider 2 Building

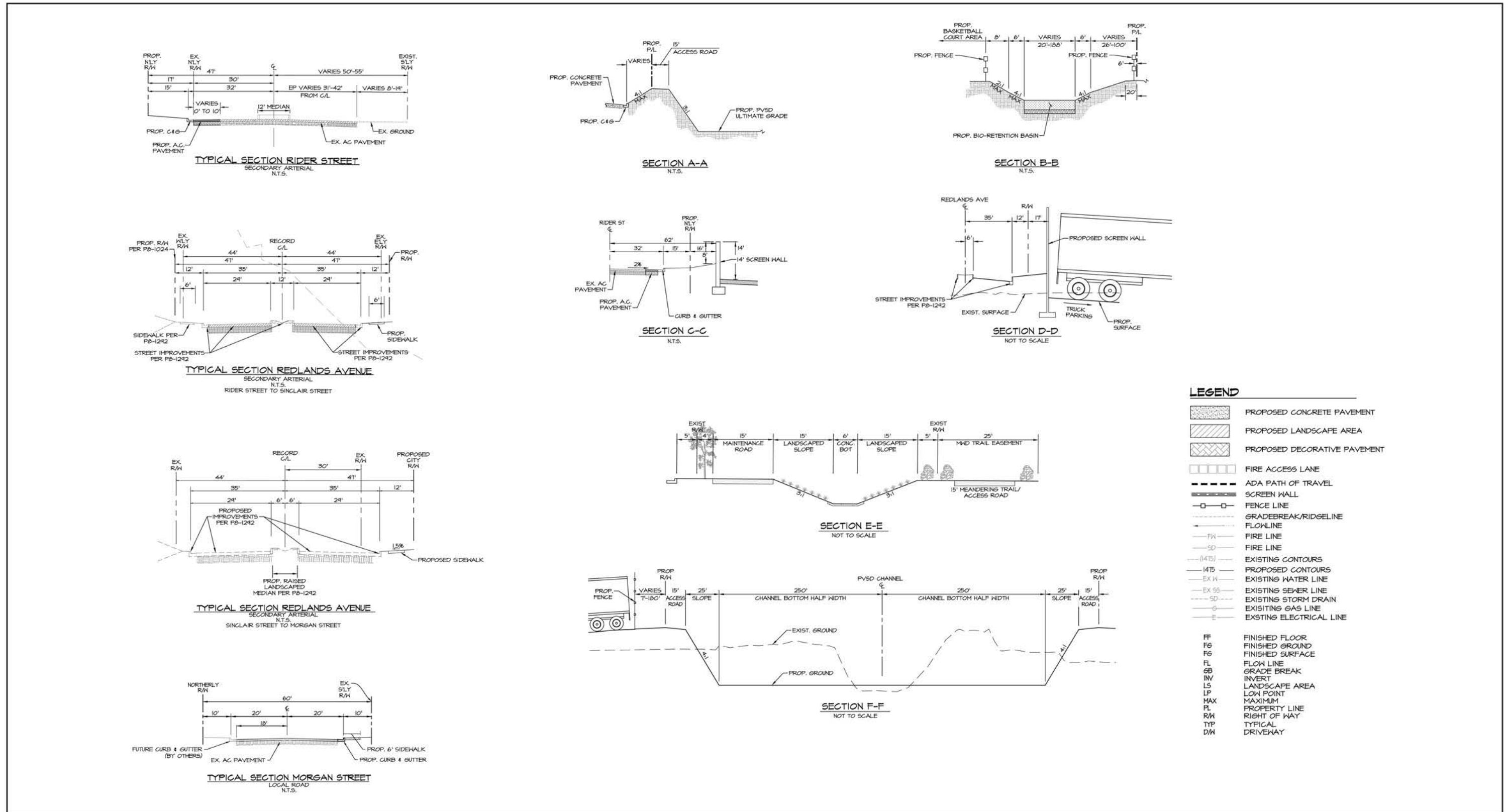


Source(s): Webb Associates (03-11-2020)

Figure 3-25



Conceptual Grading and Drainage Plan – Rider 4 Building



Source(s): Webb Associates (03-11-2020)

Figure 3-26

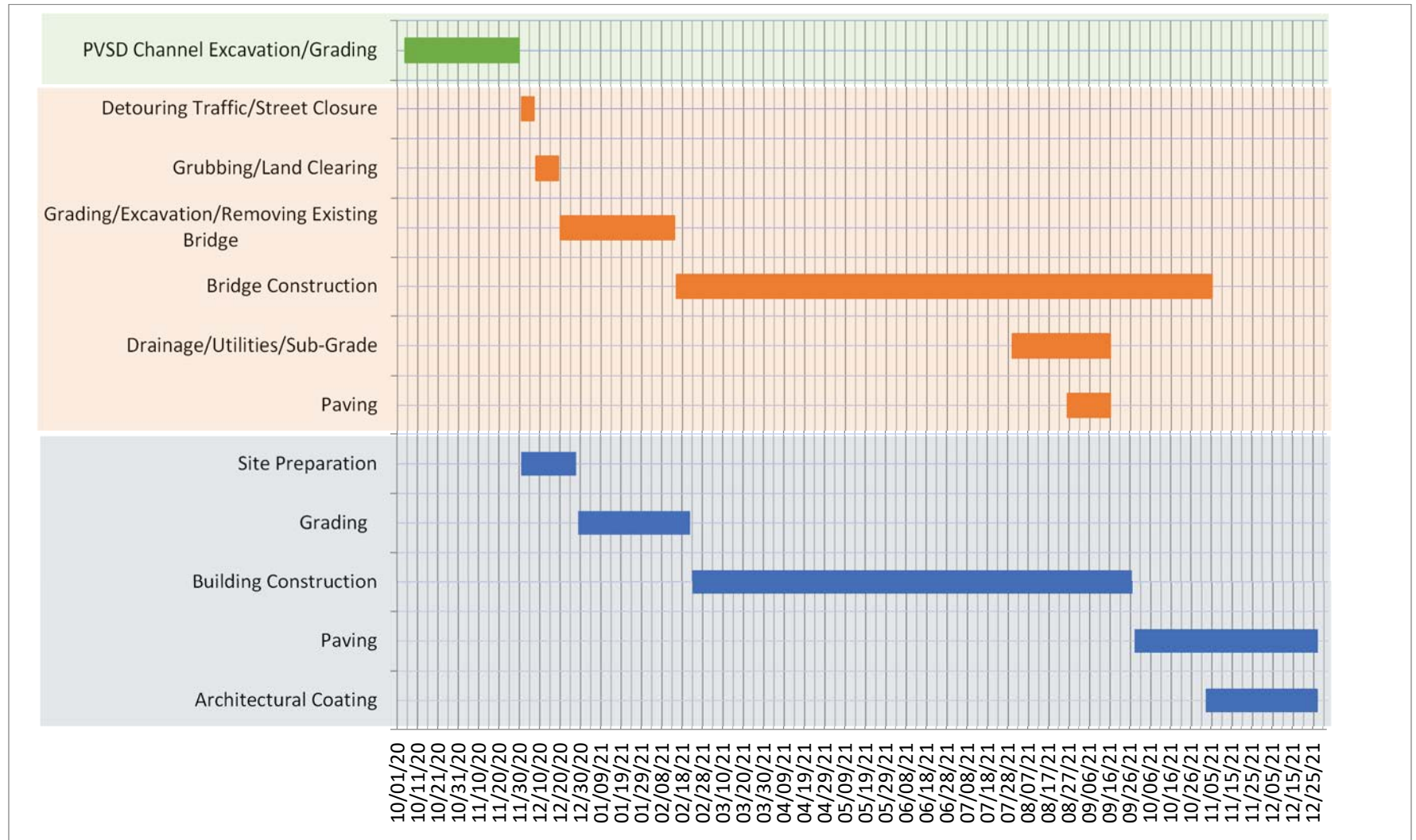
Not to Scale

Site Sections

Table 3-4 Rider Street Bridge Construction Scenarios

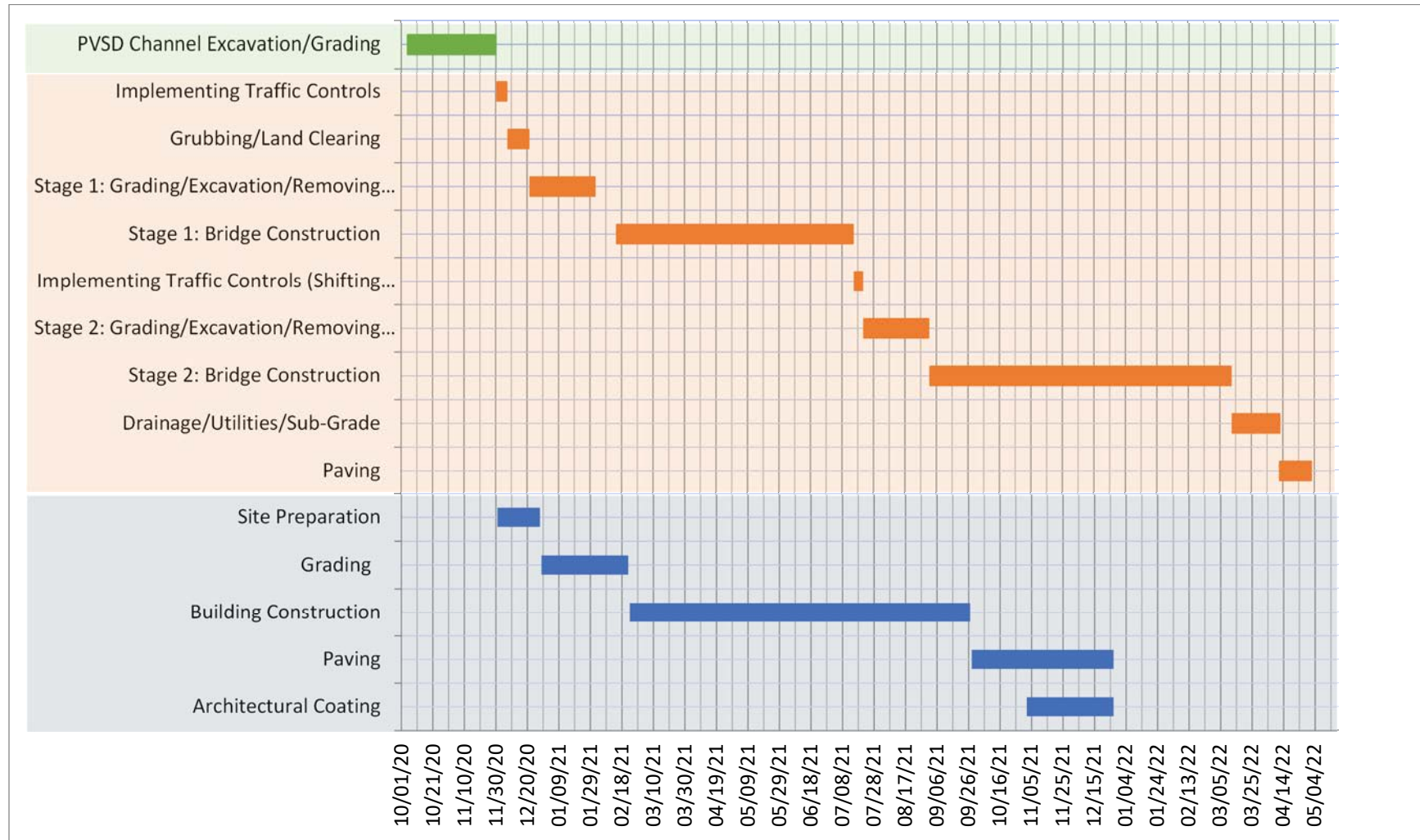
One Stage Bridge Construction Sequence	Two Stage Bridge Construction Sequence
<ul style="list-style-type: none"> • Detour traffic and close the street at the project site. • Demolish the existing culvert structure and grade the channel. • Install cast-in-drilled-hole concrete pile foundations. • Construct abutment walls and pier columns. • Ship and assemble precast concrete slab units on site. • Pour and finish the bridge deck. • Open the bridge for traffic while constructing the sidewalks and railings. 	<ul style="list-style-type: none"> • Shift traffic to the north side of the existing culvert structure and set safety measures such as temporary K-rails. • Demolish southern portion of the existing culvert structure. • Install proper shoring at the bridge approaches and grade the southern portion of the channel. • Install cast-in-drilled-hole concrete pile foundations of the Stage 1 bridge (the southern portion of the new bridge). • Construct abutment walls and pier columns of the Stage 1 bridge. • Ship and assemble precast concrete slab units of the Stage 1 bridge on site. • Pour and finish the bridge deck of the Stage 1 bridge. • Halt construction periodically due to restrictions in "wet" rainy season. • Shift traffic onto the newly constructed Stage 1 bridge. • Demolish the remaining northern portion of the existing culvert structure. • Maintain proper shoring at the bridge approaches and grade the northern portion of the channel. • Install pile foundations of the Stage 2 bridge (the northern portion of the new bridge). • Construct abutment walls and pier columns of the Stage 2 bridge. • Ship and assemble precast concrete slab units of the Stage 2 bridge on site. • Pour and finish the bridge deck of the Stage 2 bridge. • Connect Stage 1 and Stage 2 bridges with a deck closure pour. • Restore traffic while constructing sidewalks and railings.

Table 3-5 Overlap of Construction Activities (One-Stage Bridge Construction)



PVSD Channel Excavation
 PVSD Channel Construction
 Rider 2 and 4 Warehouse Construction

Table 3-6 Overlap of Construction Activities (Two-Stage Bridge Construction)



PVSD Channel Excavation
 PVSD Channel Construction
 Rider 2 and 4 Warehouse Construction

The anticipated depth of excavation would vary for the Project components: approximately 15 feet for installation of utilities; approximately 10 feet for the water quality basins; and up to 5 feet for the Rider 4 building to achieve the new site grades. Fills of approximately 4 feet would be necessary to achieve the proposed pad grade for the Rider 2 building. The depth of excavation for the PVSD Channel improvements varies, but would be up to approximately 8 feet downstream of the MWD facility.

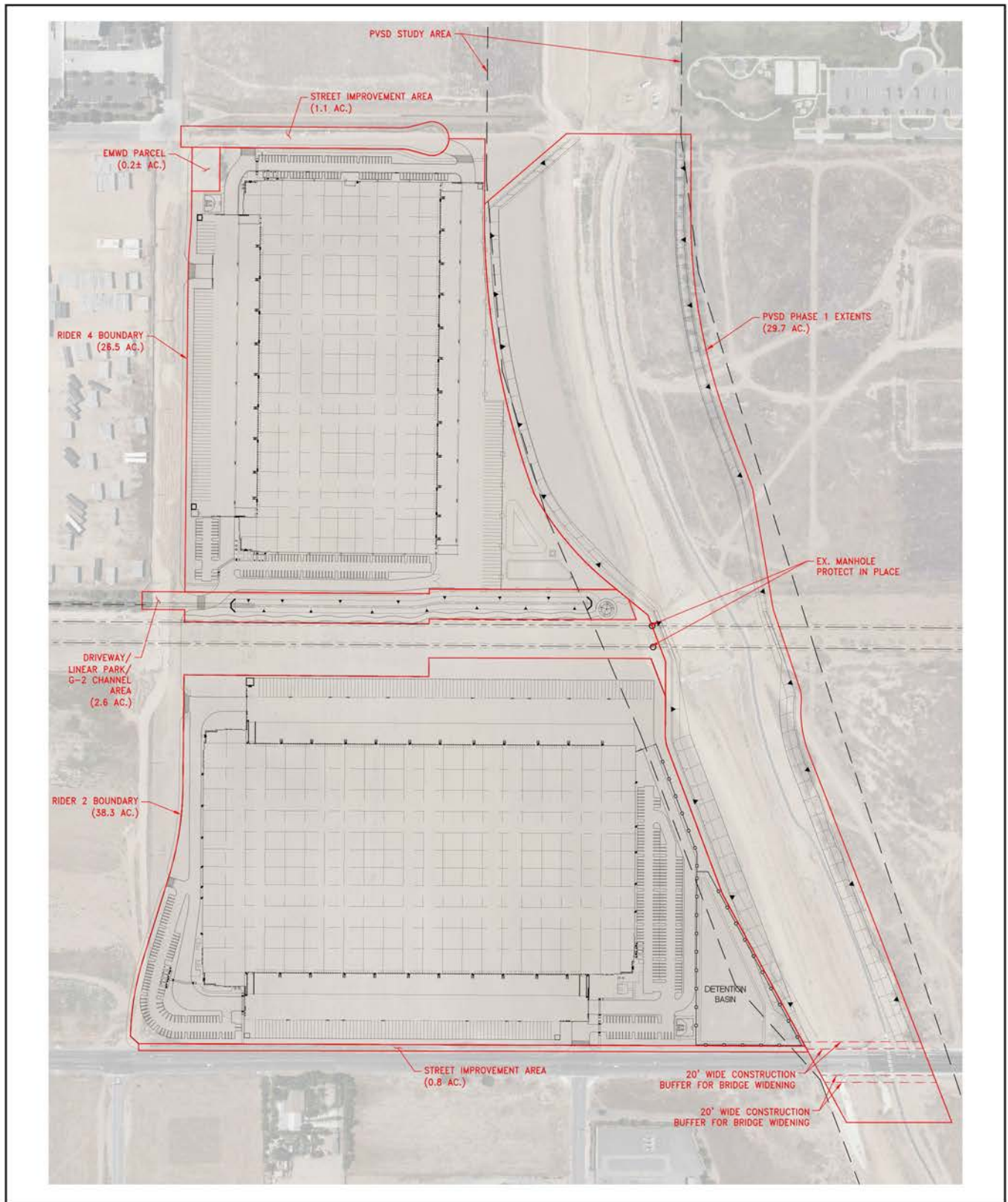
Due to the presence of shallow groundwater and potential for liquefaction at the Rider Street overcrossing of the PVSD Channel, deep foundations would be required for construction of the bridge. Based on the geotechnical conditions at the bridge site, piles driven by a hammer would not be required, CIDH (cast-in-drilled-hole) concrete piles would be used. Pile driving would not occur.

As further discussed in Section 4.12, Noise, of this EIR, the City of Perris Municipal Code, Section 7.34.060, allows construction activities during daytime hours (between the hours of 7:00 AM and 7:00 PM Monday through Saturday, except legal holidays). Construction equipment is expected to operate in the Project area eight hours per day during the allowed days and time period; however, the typical working hours for most construction contractors are 7:00 AM to 4:00 PM, and construction equipment is not in continual use; each piece of equipment is used only periodically during a typical construction work day. Thus, eight hours of daily use per piece of equipment is a reasonable assumption, and likely overstates the actual amount of time that each piece of construction equipment would operate on a daily basis. Should construction activities need to occur outside of the hours permitted by the Municipal Code, the Project Applicant would be required to obtain authorization from the City. Should on-site concrete pouring activities need to occur at night to facilitate proper concrete curing, pours would typically occur between the approximate hours of 2:00 a.m. and 8:00 a.m.

In addition to on-site construction activities, the Project would involve site adjacent roadway and driveway access improvements along Morgan Street, Redlands Avenue, and Rider Street, as previously described. Utility infrastructure would be installed on site and would connect to existing utility lines in the adjacent roadways. Construction staging would occur within the project impact limits and would be located the farthest distance feasible from existing residential uses. The Project's construction impact area, as analyzed in this EIR, is depicted in Figure 3-27, and encompasses approximately 99.2 acres. This includes approximately 94.7 acres "on site" (Rider 2 and Rider 4 building sites and the PVSD Channel improvement area) and approximately 4.5 acres "off-site" associated with roadway/driveway, linear trail, and infrastructure improvements.

Lights may be used within the construction areas, notably the construction staging areas, to provide security for construction equipment and construction materials. This type of temporary security lighting is often unshielded and may shine onto adjacent properties and roadways. Further, in the event that construction-related activities occur during nighttime hours in the Project area, temporary, overhead artificial lighting would be provided to illuminate the work area.

Construction workers would travel to the Project area by passenger vehicle and materials deliveries would occur by medium- and heavy-duty trucks. Construction of the Project would require common construction equipment. The site-specific construction fleet may vary due to specific needs at the time of construction; however, a summary of construction equipment assumptions by construction phase used for purposes of analysis in this EIR is provided in Table 3-7 and Table 3-8 for the construction scenarios assuming the Rider Street bridge is built in one or two stages, respectively. . Additional information about the construction equipment assumptions is provided in Section 4.3, Air Quality, of this EIR.



Source(s): Webb Associates (03-16-2020)

Figure 3-27



Construction Impact Area

Table 3-7 Construction Equipment Assumptions – One Stage Bridge Construction

Activity	Equipment	Amount	Hours Per Day
PVSD Channel Improvements – PVSD Channel Excavation			
Excavation	Scrapers	5	8
PVSD Channel Improvements – Rider Bridge Construction (Single Phase Construction)			
Detouring Traffic / Street Closure	Signal Boards	2	8
Grubbing/Land Clearing	Crawler Tractors	1	8
	Excavators	1	8
	Hauling Trucks	1	8
Grading/Excavation/ Removing Existing Bridge	Crawler Tractors	2	8
	Excavators	2	8
	Demolition Equipment	1	8
	Hauling Trucks	2	8
Bridge Construction	Drilling Rig	1	8
	Cranes	1	8
	Excavators	1	8
	Compactors	1	8
	Concrete Paving Machine	1	8
Drainage/Utilities/ Sub-Grade	Crawler Tractors	2	8
	Scrapers	2	8
Paving	Pavers	1	8
	Paving Equipment	1	8
	Rollers	1	8
	Signal Boards	1	8
	Tractors/Loaders/Backhoes	2	8
Rider 2 and 4 Warehouse Construction			
Site Preparation	Crawler Tractors	4	8
	Rubber Tired Dozers	3	8
Grading	Crawler Tractors	2	8
	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
Building Construction	Cranes	1	8
	Crawler Tractors	3	8

Activity	Equipment	Amount	Hours Per Day
	Forklifts	3	8
	Generator Sets	1	8
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8
Note: In order to account for fugitive dust emissions associated with Site Preparation and Grading activities, Crawler Tractors were used in lieu of Tractors/Loaders/Backhoes.			

Table 3-8 Construction Equipment Assumptions – Two Stage Bridge Construction

Activity	Equipment	Amount	Hours Per Day
PVSD Channel Improvements – PVSD Channel Excavation			
Excavation	Scrapers	5	8
PVSD Channel Improvements – Rider Bridge Construction (Two Staged Construction)			
Implementing Traffic Controls	Signal Boards	2	8
Grubbing/Land Clearing	Crawler Tractors	1	8
	Excavators	1	8
	Hauling Trucks	1	8
Stage 1 Grading/Excavation/ Removing Portion of the Existing Bridge	Crawler Tractors	1	8
	Excavators	2	8
	Demolition Equipment	1	8
	Hauling Trucks	2	8
Stage 1 Bridge Construction	Drilling Rig	1	8
	Cranes	1	8
	Excavators	1	8
	Compactors	1	8
	Concrete Paving Machine	1	8
Implementing Traffic Controls (Shifting Traffic)	Signal Boards	2	8
Stage 2 Grading/Excavation/ Removing Portion of the Existing Bridge	Crawler Tractors	1	8
	Excavators	2	8
	Demolition Equipment	1	8
	Hauling Trucks	2	8
	Drilling Rig	1	8

Activity	Equipment	Amount	Hours Per Day
Stage 2 Bridge Construction	Cranes	1	8
	Excavators	1	8
	Compactors	1	8
	Concrete Paving Machine	1	8
Drainage/Utilities/ Sub-Grade	Crawler Tractors	2	8
	Scrapers	2	8
Paving	Pavers	1	8
	Paving Equipment	1	8
	Rollers	1	8
	Signal Boards	1	8
	Tractors/Loaders/Backhoes	2	8
Rider 2 and 4 Warehouse Construction			
Site Preparation	Crawler Tractors	4	8
	Rubber Tired Dozers	3	8
Grading	Crawler Tractors	2	8
	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
Building Construction	Cranes	1	8
	Crawler Tractors	3	8
	Forklifts	3	8
	Generator Sets	1	8
	Welders	1	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8
Note: In order to account for fugitive dust emissions associated with Site Preparation and Grading activities, Crawler Tractors were used in lieu of Tractors/Loaders/Backhoes.			

3.7 SUMMARY OF REQUESTED ACTIONS

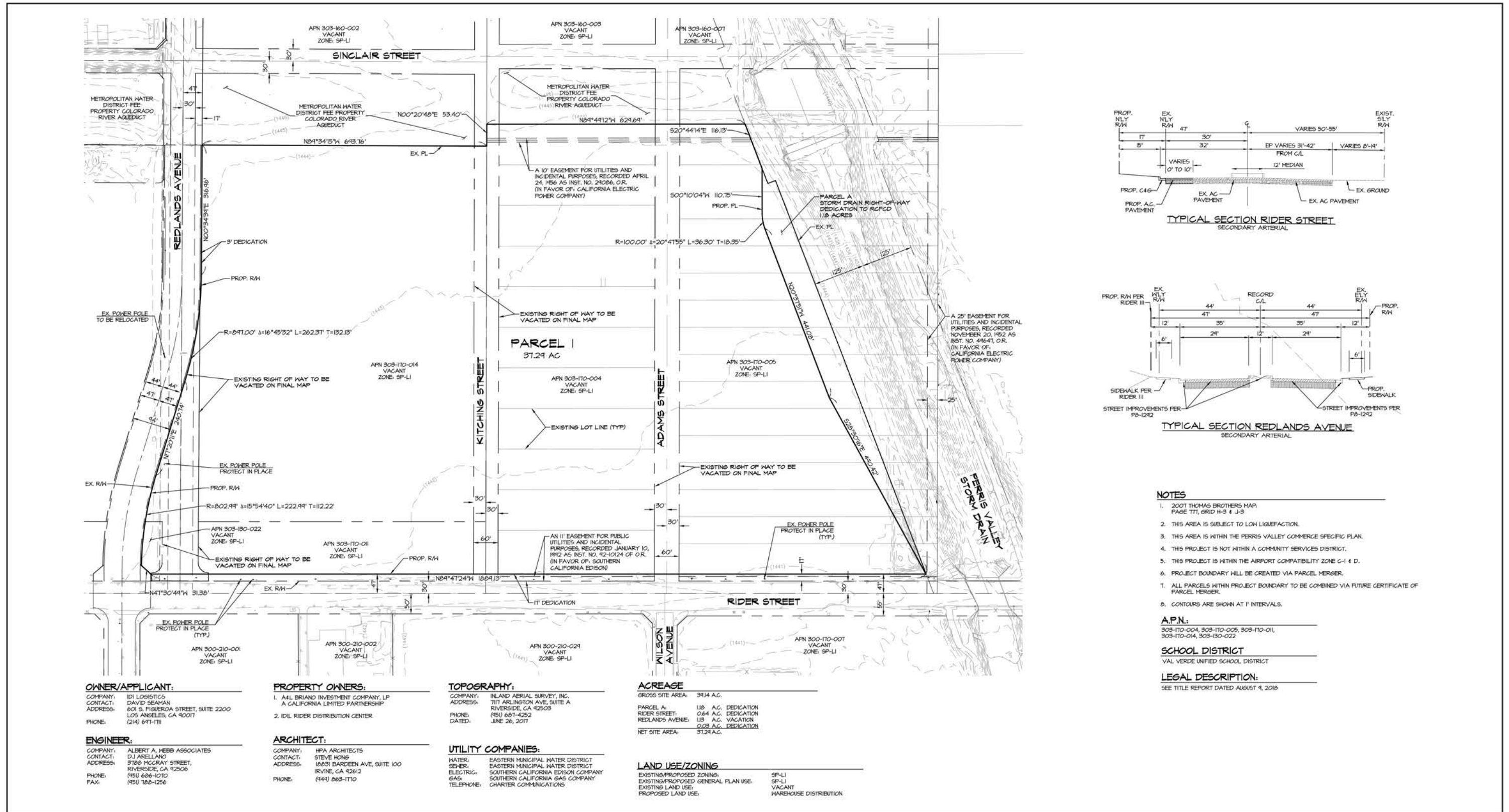
The City of Perris has primary approval responsibility for the Project. As such, the City serves as the Lead Agency for this EIR pursuant to CEQA Guidelines Section 15050. Pursuant to Section 13.0, Implementation and Administrative Process, of the PVCCSP, the City’s Planning Commission is the decision-making authority for the Project Applicant’s requested discretionary applications (Development Plan Review and Tentative Parcel Maps). The Planning Commission will make a decision regarding whether the Final EIR should be certified, and whether to approve, approve with changes, or deny the Project. The Planning Commission decision may be appealed to the City Council. In the event of approval of the Project and certification of the Final EIR, the City would subsequently conduct administrative reviews and grant ministerial permits and approvals to implement Project requirements and conditions of approval.

The Final EIR informs State, regional, and local government approvals needed for construction and/or operation of the Project, whether or not such actions are known or are explicitly listed. A list of the anticipated actions under City of Perris jurisdiction is provided in Table 3-9, *Project Related Approvals/Permits*. In addition, additional actions may be necessary from other government agencies to fully implement the Project. Table 3-9 also lists the government agencies that may be required to use the Project’s EIR during their consultation and review of the Project and its implementing actions, and provides a summary of the anticipated subsequent actions associated with the Project.

Table 3-9 Project Related Approvals/Permits

Public Agency	Approvals and Decisions
Proposed Project – City of Perris Discretionary Approvals	
City of Perris Planning Commission	<ul style="list-style-type: none"> • Certification of the EIR with the determination that the EIR has been prepared in compliance with the requirements of CEQA (Case No. 19-05180). • Development Plan Review (DPR) (Case No. 19-00004) for the Rider 2 and Rider 4 site plans and building elevations. • Tentative Parcel Map (TPM) No. 37437 for the Rider 2 site (Case No. 19-05058) to merge five existing parcels into one parcel and one lettered lot for dedication to the RCFC&WCD; and, vacate all or portions of the rights-of-way of three unimproved streets (Redlands Avenue, Kitching Street, and Adams Street). Proposed TPM No. 37437 is shown on Figure 3-28. • Tentative Parcel Map (TPM) No. 37438 for the Rider 4 site (Case No. 19-05096) to merge four existing parcels into one parcel and one lettered lot for dedication to the RCFC&WCD; and, vacate all or portions of the rights-of-way of two unimproved streets (Kitching Street and Sinclair Street). Proposed TPM No. 37438 is shown on Figure 3-29.
Subsequent City of Perris Non-discretionary Approvals	
City of Perris	<ul style="list-style-type: none"> • Review and approval of off-site infrastructure plans, including street and utility improvements pursuant to the conditions of approval;

Public Agency	Approvals and Decisions
	<ul style="list-style-type: none"> • Review all on-site plans, including grading and on-site utilities; and • Approval of a Final Water Quality Management Plans (FWQMP) to mitigate post-construction runoff flows.
Other Agencies – Subsequent Approvals and Permits	
United States Army Corps of Engineers (ACOE)	Section 404 permit for any impacts to areas within the PVSD Channel determined to be under the jurisdiction of the Corps.
Federal Emergency Management Agency (FEMA)	Issuance of Conditional Letter of Map Revisions (CLOMR) and Final Letter of Map Revision (FEMA)
California Department of Fish and Wildlife (CDFW)	Streambed Alteration Agreement pursuant to Section 1602 of the California Fish and Game Code for any impacts to areas within the PVSD Channel determined to be under the jurisdiction of the CDFW.
Regional Water Quality Board (RWQCB)	<ul style="list-style-type: none"> • Issuance of a Construction Activity General Construction Permit. • Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit. • Issuance of a Section 401 Water Quality Certification for any impacts to areas within the PVSD Channel determined to be under the jurisdiction of the RWQCB.
Metropolitan Water District (MWD)	Approval of a lease agreement for implementation of the PVSD Channel improvements within MWD's right-of-way
Riverside County Flood Control & Water Conservation District (RCFC&WCD)	Issuance of encroachment permit for construction in RCFC&WCD right-of-way, and approval of the PVSD Channel improvement plans.
Eastern Municipal Water District (EMWD)	Approval of Water Supply Assessment and water and sewer improvement plans.
South Coast Air Quality Management District (SCAQMD)	Permits to construct and/or permits to operate new stationary sources of equipment that emit or control air contaminants, such as HVAC units.
Other Utility Agencies	Permits and associated approvals, as necessary for the installation of new utility infrastructure or connections to existing facilities.



Source(s): Webb Associates (02-20-2020)

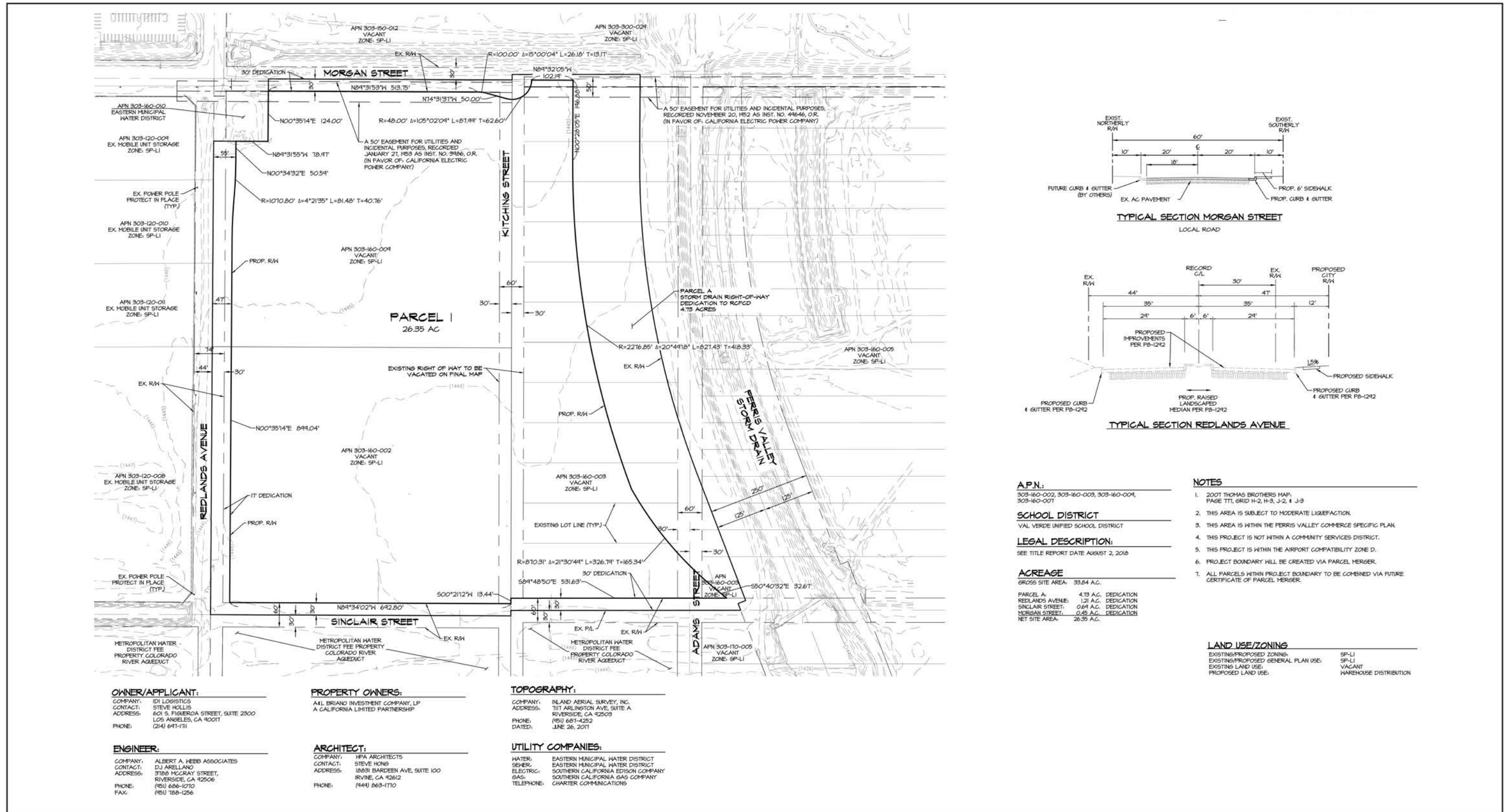
Figure 3-28



Proposed TTM No. 37437

Lead Agency: City of Perris

SCH No. 2019100297
Page 3-57



OWNER/APPLICANT:
 COMPANY: IDI LOGISTICS
 CONTACT: STEVE HOLLIS
 ADDRESS: 601 S. FIGUEROA STREET, SUITE 2300
 LOS ANGELES, CA 90071
 PHONE: (214) 641-1711

PROPERTY OWNERS:
 A+L BRIAND INVESTMENT COMPANY, LP
 A CALIFORNIA LIMITED PARTNERSHIP

ARCHITECT:
 COMPANY: HPA ARCHITECTS
 CONTACT: STEVE HONG
 ADDRESS: 10851 BARDEEN AVE, SUITE 100
 IRVINE, CA 92612
 PHONE: (949) 863-1170

TOPOGRAPHY:
 COMPANY: INLAND AERIAL SURVEY, INC.
 ADDRESS: 7111 ARLINGTON AVE, SUITE A
 RIVERSIDE, CA 92503
 PHONE: (951) 681-4252
 DATED: JUNE 26, 2011

UTILITY COMPANIES:
 WATER: EASTERN MUNICIPAL WATER DISTRICT
 SEWER: EASTERN MUNICIPAL WATER DISTRICT
 ELECTRIC: SOUTHERN CALIFORNIA EDISON COMPANY
 GAS: SOUTHERN CALIFORNIA GAS COMPANY
 TELEPHONE: CHARTER COMMUNICATIONS

APN:
 303-160-002, 303-160-003, 303-160-004,
 303-160-007

SCHOOL DISTRICT:
 VAL VERDE UNIFIED SCHOOL DISTRICT

LEGAL DESCRIPTION:
 SEE TITLE REPORT DATE AUGUST 2, 2018

ACREAGE
 GROSS SITE AREA: 33.84 AC.
 PARCEL A: 4.73 AC. DEDICATION
 REDLANDS AVENUE: 1.21 AC. DEDICATION
 SINCLAIR STREET: 0.69 AC. DEDICATION
 MORGAN STREET: 0.45 AC. DEDICATION
 NET SITE AREA: 26.35 AC.

- NOTES**
- 2007 THOMAS BROTHERS MAP, PAGE T71, GRID H-2, H-3, J-2, & J-3
 - THIS AREA IS SUBJECT TO MODERATE LIQUEFACTION.
 - THIS AREA IS WITHIN THE FERRIS VALLEY COMMERCE SPECIFIC PLAN.
 - THIS PROJECT IS NOT WITHIN A COMMUNITY SERVICES DISTRICT.
 - THIS PROJECT IS WITHIN THE AIRPORT COMPATIBILITY ZONE D.
 - PROJECT BOUNDARY WILL BE CREATED VIA PARCEL MERGER.
 - ALL PARCELS WITHIN PROJECT BOUNDARY TO BE COMBINED VIA FUTURE CERTIFICATE OF PARCEL MERGER.

LAND USE/ZONING
 EXISTING/PROPOSED ZONING: SP-LI
 EXISTING/PROPOSED GENERAL PLAN USE: SP-LI
 EXISTING LAND USE: VACANT
 PROPOSED LAND USE: WAREHOUSE DISTRIBUTION

Source(s): Webb Associates (02-20-2020)

Figure 3-29



Proposed TTM No. 37438

3.8 REFERENCES

City of Perris, 2011. *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report*. November 2011, certified January 10, 2012. Available at [http://www.cityofperris.org/city-
https://www.cityofperris.org/Home/ShowDocument?id=2645](http://www.cityofperris.org/city-https://www.cityofperris.org/Home/ShowDocument?id=2645)

City of Perris, 2013. *Perris General Plan Land Use Map*. Updated January 3, 2013.

City of Perris, 2018. *Perris Valley Commerce Center Amendment No. 9 Specific Plan*. May 2018, adopted January 10, 2012, and subsequently amended and approved August 28, 2018. Available at <https://www.cityofperris.org/Home/ShowDocument?id=2647>

RCFC&WCD, 1989. Riverside County Flood Control and Water Conservation District *Master Drainage Plan for the Perris Valley Channel Zone Four*. October 1989. Available at <http://rcflood.org/Downloads/Master%20Drainage%20Plans/Updated/Zone%204/Reports/PV%20Channel%20MDP%20report.pdf>

RCFC&WCD, 1991. Riverside County Flood Control and Water Conservation District *Master Drainage Plan for the Perris Valley Area Zone 4*. July 1987, revised 1991. Available at http://rcflood.org/Downloads/Master%20Drainage%20Plans/Updated/Zone%204/Reports/PerrisValleyMDP_report.pdf

4.0 ENVIRONMENTAL IMPACT ANALYSIS

4.0.1 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS

Sections 4.1 through 4.15 of this Draft Environmental Impact Report (EIR) provide analysis of impacts for those environmental topics where it was determined that the Project could result in “potentially significant impacts.” Each topical section includes the following information:

- A description of the existing setting including a discussion of the regulatory framework, if applicable.
- Identification of thresholds of significance.
- Identification of applicable Perris Valley Commerce Center Specific Plan (PVCCSP) Standards and Guidelines and PVCCSP EIR mitigation measures if applicable.
- Identification of Project Design Features (PDFs) that have been incorporated into the Project to prevent the occurrence of or to reduce the significance of potential environmental impacts from the Project.
- Analysis of potential Project effects.
- Identification of additional Project-specific mitigation measures, if required, to reduce the identified Project impacts.
- Identification of the level of significance of impacts after mitigation, including unavoidable significant adverse impacts.
- Evaluation of potential cumulative impacts.

As discussed in Section 2.0, Introduction, this EIR is tiered from the *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report* (PVCCSP EIR) (State Clearinghouse No. 2009081086) (City of Perris, 2011). The California Environmental Quality Act (CEQA) and the State CEQA Guidelines encourage the use of tiered environmental documents to eliminate repetitive discussions of the same issues. The PVCCSP EIR provides a broad analysis of the environmental effects of implementing the planned development, as outlined in the PVCCSP. Based on the Notice of Preparation (NOP) included in Appendix A of this Draft, the City of Perris determined that the Project required a Project-level tiered EIR. While some impacts of the Project (which incorporates applicable PVCCSP Standards and Guidelines and mitigation measures required by the PVCCSP Final EIR) were determined to be less than significant, other Project-specific impacts require additional project-specific analysis.

As described in Section 3.0, Project Description, the Project includes three primary components: 804,759-square foot (sf) Rider 2 building and associated improvements; 547,977-sf Rider 4 building and associated improvements; and the PVSD Channel Improvements extending between just north of Morgan Street to just south of Rider Street, including the replacement of the Rider Street bridge. Off-site improvements primarily include site-adjacent roadway and infrastructure improvements. These three

Project components collectively encompass approximately 99.2-acres (approximately 94.7-acres on site and 4.5-acres off site). Unless otherwise noted, the analysis presented in Section 4.1 through 4.15 of this EIR addresses the entire Project. Distinctions between impacts from construction and operation of the buildings and the PVSD Channel Improvements are made when pertinent to the topical issue.

4.0.2 MITIGATION PROGRAM

The mitigation program identified for each topical issue to reduce potential Project impacts consists of applicable PVCCSP EIR mitigation measures (MMs), Project Design Features (PDFs), and additional Project-specific MMs. The components of the mitigation program are described below; each component will be included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project.

- **PVCCSP EIR Mitigation Measures.** Projects implementing the PVCCSP are required to comply with identified Standards and Guidelines and applicable MMs from the PVCCSP EIR. Applicable PVCCSP EIR MMs that are incorporated as part of the Project and are assumed in the analysis are identified in this section.
- **Project Design Features (PDF).** PDFs are specific Project components or design elements that have been incorporated into the Project to prevent the occurrence of, or to reduce the significance of, potential environmental effects. Because PDFs have been incorporated into the Project, they do not constitute MMs, as defined by CEQA. However, PDFs are identified so that they are included in the MMRP to be implemented as a part of the Project. In the absence of the implementation of a PDF, a significant impact could occur.
- **Additional Mitigation Measures (MMs).** Where a potentially significant environmental effect has been identified and is not reduced to a level considered less than significant through the application of PVCCSP EIR MMs or PDFs, Project-specific MMs have been recommended in accordance with CEQA.

If the Project proponent requests a modification, substitution, or change in timing for a PDF or MM because the PDF or MM in current form proves to be impracticable or unworkable, the City may modify, substitute, or change the timing for the PDF or MM as long as: (1) the modification, substitution, or change in timing would achieve the same or greater reduction in potential impacts of the Project as the original PDF or MM; (2) the modification, substitution, or change would not cause any impacts that were not otherwise analyzed in this EIR; (3) the City publicly provides a legitimate reason for making the modification, substitution, or change in timing and supports the reason with substantial evidence. The City of Perris Planning Division, in conjunction with any appropriate agencies or City departments, will determine the adequacy of any proposed modification, substitution, or change in timing and may refer its determination to the Planning Commission. The Project proponent will bear any costs associated with providing information that any department or decision-making body for the City requires to make the determination.

4.0.3 ASSUMPTIONS REGARDING CUMULATIVE IMPACTS

Section 15130 of the State CEQA Guidelines states that cumulative impacts shall be discussed where they are significant. Section 15130 of the State CEQA Guidelines further states that this discussion shall reflect the level and severity of the impact and the likelihood of occurrence, but not in as great a level of detail as that necessary for the Project alone. Section 15355 of the State CEQA Guidelines defines cumulative impacts as “. . . two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” Section 15130(a) of the State CEQA Guidelines states that “cumulative impacts shall be discussed when the project’s incremental effect is cumulatively considerable.” Section 15355(b) of the State CEQA Guidelines states that “cumulative impacts represent the change in the environment caused by the incremental impact of a project when added to other closely related past, present, and reasonably foreseeable probable future projects in the vicinity.”

Because the Project is consistent with the PVCCSP and this EIR is tiered from the PVCCSP EIR, Section 15130(d) of the State CEQA Guidelines is particularly relevant to the analysis of cumulative impacts for the Project and states:

Previously approved land use documents, including, but not limited to, general plans, specific plans, regional transportation plans, plans for the reduction of greenhouse gas emissions, and local coastal plans may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impacts analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or area-wide cumulative impacts of the proposed project have already been adequately addressed, as defined in section 15152(f), in a certified EIR for that plan.

Section 15130(b)(1) of the State CEQA Guidelines further states that the information utilized in an analysis of cumulative impacts should come from one of two sources, either:

1. A list of past, present, and probable future projects producing related cumulative impacts, including if necessary, those projects outside the control of the agency, or
2. A summary of projections contained in an adopted local, regional, or Statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect.

As discussed in Section 3.6, Project Components, of this EIR, the Project implements and is consistent with the land use envisioned for the Project area under the PVCCSP. As such, and because this EIR is tiered from the PVCCSP EIR, no further cumulative impact analysis is required. The cumulative impact analysis provided in Section 5.0, Other CEQA Topics, of the PVCCSP EIR is hereby incorporated by reference and is available for review at the location cited in Section 2.5, Public Review of the EIR, of this EIR. The PVCCSP EIR primarily utilizes the “summary of projections” approach (see Item No. 2 above) in the cumulative analysis, which is based on information contained in the *City of Perris General Plan 2030* (Perris General Plan) and *City of Perris General Plan 2030 Draft Environmental Impact Report* (Perris General Plan EIR) (SCH No. 2004031135), which was certified by the City of Perris City Council in April 2005 (City of Perris, 2004). These documents are utilized because the geographic area addressed

in the two documents encompasses not only the PVCCSP area, but all portions of the City surrounding the PVCCSP area that could be potentially impacted by the contribution to cumulative impacts from implementation of the PVCCSP. Both documents are incorporated by reference in the PVCCSP EIR and this EIR.

Because of the nature of individual environmental factors, the cumulative area for each topical issue is not the same. The individual cumulative areas for the issues addressed in this EIR are provided in the respective impact sections, and are consistent with the PVCCSP EIR, unless otherwise noted. In addition to the City of Perris General Plan study area, the cumulative analysis for individual topical issues may consider specific cumulative study areas designated by respective agencies for regional or area-wide conditions. For instance, topic-specific cumulative study areas have been developed (e.g., South Coast Air Basin for air quality and the Perris Valley/San Jacinto Watershed for hydrology and water quality). Also, this EIR considers regional programs directed at mitigating cumulative impacts of development such as those instituted for urban runoff.

Finally, and where appropriate to the analysis in question, cumulative impacts are assessed with reference to a list of cumulative projects. A comprehensive cumulative project list was compiled for the Traffic Impact Analysis (included in Appendix L of this EIR) based on information provided by the City of Perris Planning Division in conjunction with research conducted to identify pending development projects and development applications on file with adjacent jurisdictions, including portions of the City of Moreno Valley, and unincorporated Riverside County. Figure 4.13-10, Cumulative Development Location Map, in Section 4.13, Transportation, of this EIR, illustrates the cumulative development location map (Urban Crossroads, 2020). A summary of cumulative development projects and their proposed land uses are provided in Table 4-3 of the TIA included as Appendix L of this EIR.

4.0.4 REFERENCES

City of Perris, 2004. *Draft Environmental Impact Report City of Perris General Plan 2030, State Clearinghouse #2004031135*. October 2004, certified April 26, 2005.

City of Perris, 2011. *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report*. November 2011, certified January 10, 2012. Available at <https://www.cityofperris.org/Home/ShowDocument?id=2645>

Urban Crossroads, 2020. *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Traffic Impact Analysis*. May 15, 2020. Included in Appendix L of this EIR.

4.1 AESTHETICS

This section describes the existing aesthetic condition of the Project area and surrounding area. It also analyzes the visual character of the Project (such as building design and architecture, landscaping, and light and glare generation) and consistency with development standards and guidelines as outlined in the Perris Valley Commerce Center Specific Plan (PVCCSP). Descriptions of existing visual characteristics, both on site and in the vicinity of the Project area, are provided to assess the changes in visual character resulting from the Project. Information presented in this section is primarily based on the analyses of site photographs, reconnaissance, and Project design information prepared for the Project application and included in Section 3.0, Project Description, of this Environmental Impact Report (EIR).

There were no comments received on the Notice of Preparation (NOP) or at the November 6, 2019 EIR public scoping meeting regarding aesthetics.

4.1.1 EXISTING SETTING

Project Area and Surrounding Area

The Project area is in the northern portion of the City of Perris and generally located east of Interstate (I)-215, south of State Route (SR)-60, north of SR-74, and west of the Lake Perris. The visual character of the Project area and surrounding area is typical of areas transitioning from a rural agricultural area to industrial and other urban uses, consistent with development standards established through previously approved Specific Plans. The Project area is undeveloped, except for the eastern portion which includes the Perris Valley Storm Drain (PVSD) Channel. Temporary construction trailers for development of previously approved buildings in the Rider Business Center (Rider 1 and Rider 3) have been placed in the southwest portion of the Rider 2 site, adjacent to Rider Street. As previously shown in Figure 3-2, Aerial Photograph, of this EIR, the Project area is bordered by an operating trailer storage yard facility and the Rider 3 building within the PVCCSP area to the west; undeveloped, vacant land within the PVCCSP area to the north; Morgan Park and single family residential uses within the May Ranch Specific Plan area to the northeast; undeveloped, vacant land and single family residential uses within the New Horizons Specific Plan area to the east; and an electrical sub-station, undeveloped and vacant land, industrial, and non-conforming residential uses within the PVCCSP area to the south. It should be noted that the City of Perris plans to construct Morgan Park Phase II, consisting of a lighted soccer field and parking area south of the existing Morgan Park (south of Morgan Street) (City of Perris, 2019). The park will be constructed in 2020.

Under existing conditions, the Project area does not support any uses that create light or glare. Existing sources of light from the surrounding land uses primarily include security lighting associated with the industrial uses and headlights from trucks and passenger vehicles. There are no existing building or man-made features on site or near the Project area that are constructed of materials that cause glare. As identified in Section 12.0, Airport Overlay Zone, of the PVCCSP, the Airport Overlay Zone for the March Air Reserve Base/Inland Port (MARB/IP) Airport extends through the central part of the PVCCSP area. The Project area is located approximately 2.0 miles southeast of the MARB/IP Airport. Development of the Project area is required to comply with applicable regulations to ensure that MARB/IP Airport operations are not affected by light or glare from the proposed uses; this issue is addressed in Section 4.9, Hazards and Hazardous Materials, of this EIR.

Topographic/Vegetation Features

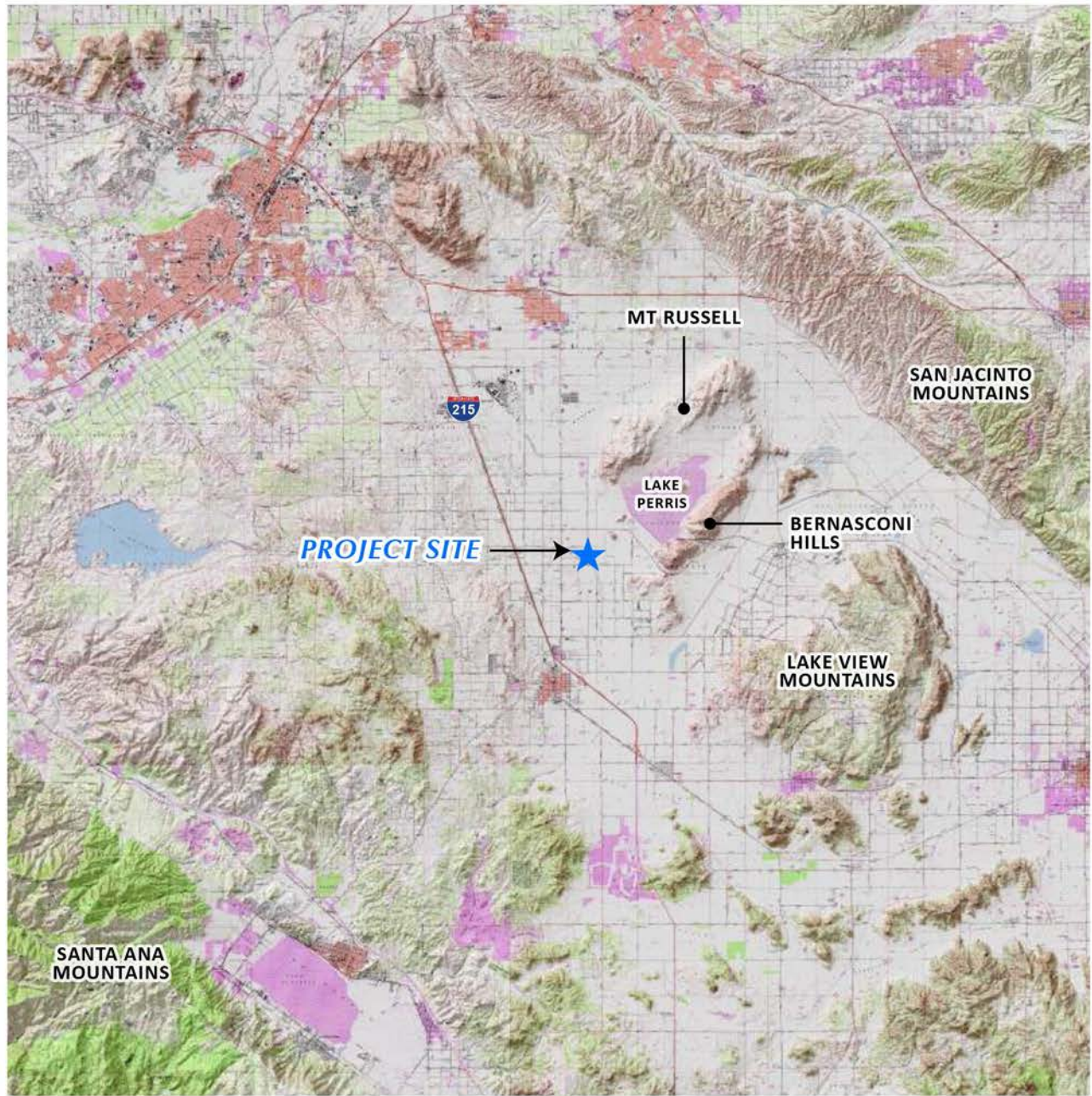
As shown on Figure 4.1-1, Natural Landforms, the Project area is situated in the Perris Valley between the San Jacinto and Santa Ana Mountains. The proposed Rider 2 and Rider 4 building sites, which encompass the western portion of the Project area, are relatively flat, descending gradually from north to south; the elevations range from approximately 1,450 feet above mean sea level (amsl) in northwest corner to approximately 1,440 feet amsl in the southeast corner. The existing PVSD Channel, which encompasses the eastern portion of the Project area, is largely unimproved. Under existing conditions, the proposed building sites and the majority of the PVSD Channel consist of ruderal vegetation and disturbed land. The PVSD Channel contains a limited amount of disturbed southern riparian scrub habitat south of Morgan Street. There are no trees or other vegetation types on the Project area that are prominent visual features (GLA, 2019; GLA, 2020).

Views

Figure 4.1-2 through Figure 4.1-5 include site photographs that depict the existing visual character of the Project area and the surrounding area. These photographs were taken from ground level public vantage points adjacent to the Project area and are representative of views from the surrounding roadways, bikeways and pedestrian facilities, and Morgan Park (Phase I) to the northeast. However, it should be noted that Redlands Avenue is currently under construction adjacent to the Project area, Morgan Street has been not been constructed, and there are limited public uses surrounding the Project area. Therefore, there is a limited number of viewers and public viewsheds. Due to the relatively flat topography of the Project area, views of the site from distant vantage points are also limited.

Each of the viewsheds presented in Figure 4.1-2 through Figure 4.1-5 is described below and has a corresponding index map identifying the vantage point and direction of the view. The foreground view shown on each photograph is of the Project area and demonstrates that the Project area is currently undeveloped; however, construction trailers for the Rider 3 building were placed in the southeast corner of the Project area and still remain there.

- **Views 1 through 4 – Views from the North.** Views 1 through 4, shown in Figure 4.1-2, represent existing views from vantage points north of the Project area generally looking south, including: existing views that would be experienced from pedestrians and bicyclists traveling south on the existing bike path along the PVSD Channel and from Morgan Park (refer to View 1); and, views from Redlands Avenue and future Morgan Street, which are both identified as Major Roadway Visual Corridors in the PVCCSP (refer to Views 2 through 4). As shown in these photographs, the Project area is undeveloped and relatively flat allowing for unobstructed distant views. Existing industrial development is visible in the background of View 1, and local hills are visible in the background from View 3 (intersection of Redlands Avenue and Morgan Street). View 3 also depicts existing pavement on the EMWD parcel northwest of the Project area. View 4 depicts the view south along Redlands Avenue (under construction when this photograph was taken). As shown in View 4, existing industrial development and high-power transmission lines along the west side of Redlands Avenue are a focal point in this viewshed due to the lack of development on the Project area (east of Redlands on left side of the View 4 photograph). Mature trees visible in the background views are offsite, and primarily south of Rider Street and associated with existing residential development east of the Project area.



Source(s): Google Imagery (2019)

Figure 4.1-1



Not to Scale

Natural Landforms



View 1



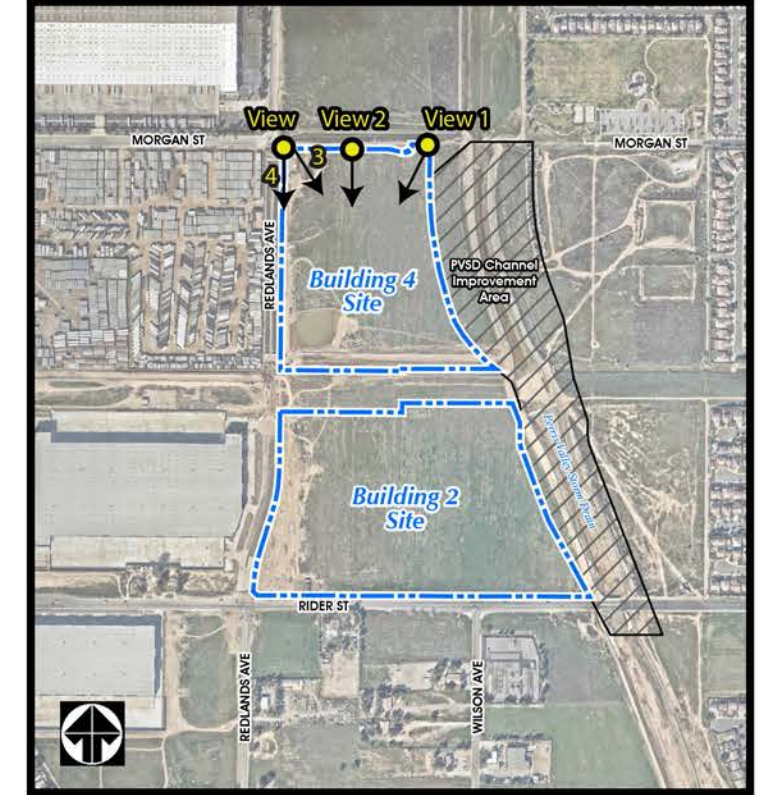
View 2



View 3



View 4



Key Map

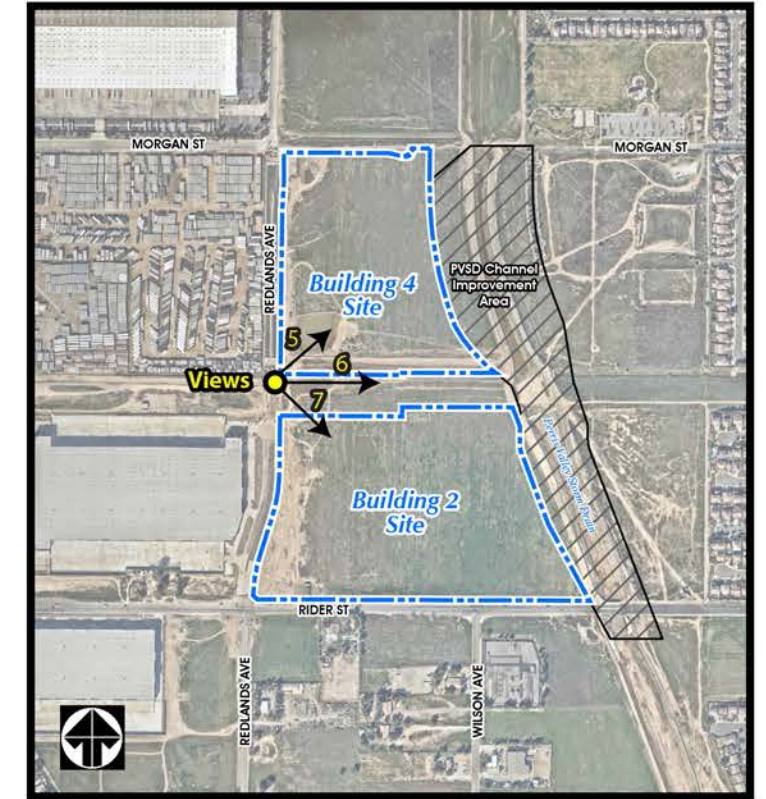
Figure 4.1-2

Not to Scale

Site Photos from the North



View 5



Key Map



View 6



View 7

Figure 4.1-3

Not to Scale

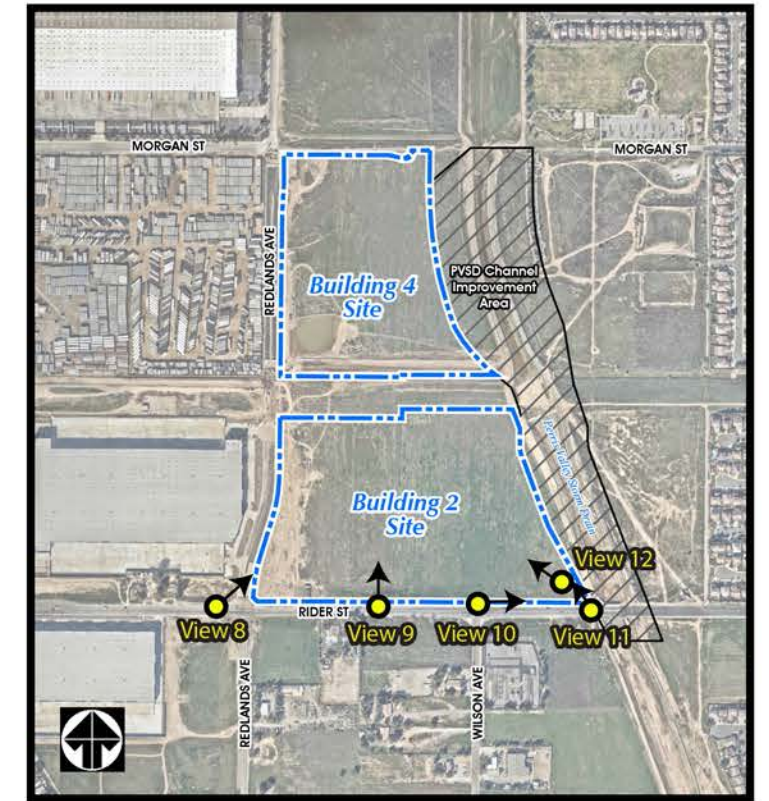
Site Photos from the West



View 8



View 9



Key Map



View 10



View 11



View 12

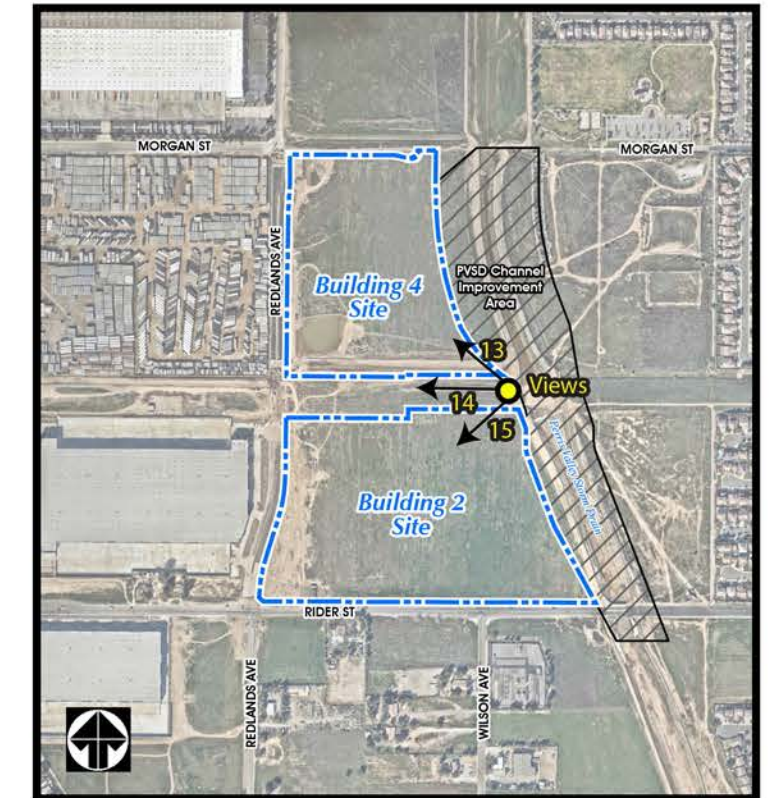
Figure 4.1-4

Not to Scale

Site Photos from the South



View 13



Key Map



View 14



View 15

Figure 4.1-5

Not to Scale

Site Photos from the East

- **Views 5 through 7 – Views from the West.** Views 5 through 7 on Figure 4.1-3 depict the visual character of the Project area and surrounding areas as viewed from the western boundary of the Project area (future Redlands Avenue), generally at the MWD easement. Public views from these vantage points are currently limited as Redlands Avenue, a designated Major Roadway Visual Corridor in the PVCCSP, is under construction and private industrial uses are located to the west. These photographs further depict the undeveloped and relatively flat nature of the Project area, with low lying ruderal vegetation. Redlands Avenue construction activities are prominent in the foreground, and the Bernasconi Hills and Lakeview Mountains (east and southeast of the Project area, respectively) are prominent visual features in the background. From these vantage points, there are also background views of existing developed areas to the northeast, east and southeast, which are largely obstructed by mature trees.
- **Views 8 through 12 – Views from the South.** Views 8 through 12 shown on Figure 4.1-4 depict the visual character of the Project area and surrounding areas as viewed from vantage points south of the Project area along Rider Street, a designated Major Roadway Visual Corridor in the PVCCSP, and from the PVSD Channel in the southeast portion of the Project area. These photographs are representative of public views from motorists, pedestrians and bicyclists traveling east and west along Rider Street, and pedestrians and bicyclists traveling north along the existing trail on the west side of the PVSD Channel. Similar to the previous photographs, the photographs from Views 8 through 12 depict the undeveloped nature of the Project area, which allows for unobstructed distant views, and demonstrate the transitioning visual character of the area from agricultural and or vacant land to urban uses allowed by approved Specific Plans, including industrial development in the PVCCSP area and residential uses in the May Ranch and New Horizons Specific Plan areas. Notably, the Rider 3 building is visible west of the Project area in View 8, along with Redlands Avenue (under construction). Additionally, there are prominent background views of hills and mountains to the north east and southeast (i.e., Mount Russell, Bernasconi Hills, and Lakeview Mountains). These photographs also depict the prominence of overhead transmission lines in the foreground views along Rider Street and the PVSD Channel.
- **Views 13 through 15 – Views from the East.** Views 13 through 15 on Figure 4.1-5 depict the visual character of the Project area and surrounding areas to the west as viewed from the eastern boundary of the building sites at the MWD easement (on the west site of the PVSD Channel). These views are representative of views from the trail along the east side of the PVSD Channel; the vacant Project area and MWD easement are visible in the foreground views. Due to the undeveloped nature of the Project area, there are unobstructed views of industrial uses west of Redlands Avenue, which are a focal point of the views from these vantage points. Overhead transmission lines and mature trees along Rider Street are also visible in Views 13 and 14. Distant mountain views to the west are partially obstructed by existing development.

Light and Glare

Due to the absence of on-site development, no lighting sources currently exist within the Project area limits. As previously discussed, existing sources of the light in the Project vicinity primarily include exterior lighting from nearby industrial uses and vehicle headlights along existing roadways. There are no existing buildings or other man-made features on site or near the Project area that are constructed of materials that cause substantial glare.

4.1.2 EXISTING POLICIES AND REGULATIONS

Following is a discussion of relevant policies and regulations applicable to development in the City of Perris, including the Project area. It should be noted that the development of the Project is also required to comply with the PVCCSP's Design Standards and Guidelines related to aesthetics and visual character, which are identified in Section 4.1.4, below.

County of Riverside Ordinance No. 655

In the absence of a specific City regulation for the purpose of protecting astronomical observation and research, the City applies Riverside County Ordinance No. 655 to projects. On June 7, 1988, the County of Riverside Board of Supervisors adopted Ordinance No. 655, which restricts the permitted use of certain light fixtures emitting light into the night sky that may have a detrimental effect on astronomical observation and research. This ordinance establishes two zones in which different lamp types are allowed or prohibited: Zone A is the area within a 15-mile radius of Palomar Observatory and Zone B is the area that extends from the outer limit of Zone A to 45 miles from Palomar Observatory. The Project area is located within Zone B. Riverside County Ordinance No. 655 also provides a list of general prohibitions that apply to both zones (Riverside County, 1988).

4.1.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on aesthetic/visual character and lighting if it will:

- Have a substantial adverse effect on a scenic vista;
- Substantially degrade scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway;
- In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site (Public views are those that are experienced from publicly accessible vantage point). If the project is an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; and
- Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

4.1.4 ENVIRONMENTAL IMPACTS

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to aesthetics/visual character and lighting. These Standards and Guidelines summarized below are incorporated as part of the Project and are assumed in the analysis presented in this section. The Project is required to comply with these Standards and Guidelines. The chapters/section numbers provided correspond to the PVCCSP chapters/sections.

On-Site Design Standards and Guidelines (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 PVCCSP, land use standards and design criteria have been created for each land use category, and are summarized in Table 4.0-1, Development Standards by Land Use, of the PVCCSP. A summary of the standards applicable to Aesthetics for industrial projects within the PVCCSP 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
- Visual Overlay Zones

4.2.2 Site Layout for Commerce Zones

- **4.2.2.1 Building Orientation/Placement:** Building Frontages/Entrances; Distinct Visual Link; Create Diversity and Sense of Community; and Utilize Building for Screening
- **4.2.2.4 Parking and Loading:** Screening Parking Lot
- **4.2.2.5 Screening:** Screen Loading Docks; Screening Methods; Screen Outdoor Storage Areas; Work Areas, etc.
- **4.2.2.6 Outdoor Storage:** No Outdoor Storage Permitted Other Than as Specified
- **4.2.2.7 Water Quality Site Design:** Best Management Practice (BMP) Features in “Visibility Zone”

4.2.3 Architecture

- **4.2.3.1 Scale, Massing and Building Relief:** Scaling in Relationship to Neighboring Structures; Variation in Plane and Form; Project Identity; Do Not Rely on Landscaping; Distinct Visual Link; Break Up Tall Structures; Avoid Monotony; Avoid Long, Monotonous and Unbroken Building Facades; Provide Vertical or Horizontal Offsets; and Fenestration

- **4.2.3.2 Architectural Elevations and Details:** Primary Building Entries; Elements of a Building; Large Sites with Multiple Buildings; Discernible Base, Body and Cap; Visual Relief; and, Building Relief
- **4.2.3.3 Roofs and Parapets:** Integral Part of the Building Design; Overall Mass; Varied Roof Lines; Form and Materials; Avoid Monotony; Variation in Parapet Height; Flat Roof and Parapets; and Conceal Roof Mounted Equipment
- **4.2.3.5 Color and Materials:** Facades; Building Trim and Accent Areas; Metal Siding; and High-Quality Natural Materials

4.2.4 Lighting

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

4.2.5 Signage Program

- **4.2.5.1 Sign Program:** Multiple Buildings and/or Tenants; Major Roadway Zones/Freeway Corridor; Location; Direct On-Site Traffic Circulation; 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

4.2.7 Utilities

- Pad-mounted Transformers and Meter Box Locations
- Electrical, Telephone, CATV and Similar Service Wires and Cables
- Electrical Transmission Lines
- All Equipment Shall be Internalized

4.2.9 Visual Overlay Zone Development Standards and Guidelines

- **4.2.9.2 Major Roadway Visual Zones:** Quality Architectural Presence; Full-Building Articulation and Enhancement; Integrated Screenwall Designs; Enhanced Landscape Setback Areas; Enhanced Entry Treatment; Entry Point; Screening, Loading and Service Areas; Limit or Eliminate Landscaping Along Side or Rear Setbacks; Uplight Trees and Other Landscape; Landscaped Accent Along Building Foundation; Heavily Landscape Parking Lot; and Limited Parking Fields

Landscape Standards and Guidelines (Chapter 6.0 of the PVCCSP)

6.1 On-Site Landscape General Requirements

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

6.1.1 On-Site Landscape Screening

- Plant Screening Maturity
- Screenwall Painting
- 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

6.2 Off-Site Landscape General Requirements

6.2.1 Streetscape Landscape

- Secondary Arterial (with Striped Median)

6.2.3 MWD Trail Landscape Standards and Guidelines

- Landscaping
- Trash Receptacles
- Trees
- Segment 1 – Greenbelt
- Segment 2 – Sinclair Terminus

Industrial Design Standards and Guidelines (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

Airport Overlay Zone (Chapter 12.0 of the PVCCSP)

12.1.3 Compatibility with March ARB/IP ALUCP

- Lighting Plans

The PVCCSP EIR does not include mitigation measures relevant to the analysis of aesthetics impacts; however, it does include mitigation measures to address potential hazards to MARB/IP Airport operations that are also relevant to the analysis of light and glare impacts. These mitigation measures are incorporated as part of the Project and assumed in the analysis presented in this section. These mitigation measures will be included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project.

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

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

- (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.*

Impact Analysis

Threshold a Would the project have a substantial adverse effect on a scenic vista?

The PVCCSP EIR Initial Study (Section 13, Aesthetics) concluded that the PVCCSP area is not located within a scenic vista, nor will the development of the PVCCSP, including the change in land uses, have an adverse effect on a scenic vista. Further, the PVCCSP EIR Initial Study concludes that the PVCCSP restricts building heights and includes architectural design and landscape guidelines that will meet the City's development standards, further reducing the potential for visual impacts. (City of Perris, 2009)

As identified in the PVCCSP EIR Initial Study, scenic vistas can be defined as the view of an area that is visually or aesthetically pleasing. From various vantage points within the City, there are views of Lake Perris Dam to the northeast; the Bernasconi Hills to the east; Gavilan Hills and the Motte-Rimrock Reserve to the west; and MARB to the north. Development projects can potentially impact scenic vistas in two ways: (1) directly diminishing the scenic quality of the vista, or (2) by blocking the view corridors or "vistas" of scenic resources. The City of Perris is located within the Perris Valley, and the terrain is generally flat. According to the City's General Plan EIR (Section 6.1, Aesthetics) (City of Perris, 2004):

...[B]ecause the bulk of developable land within the City of Perris is located on the flat, broad basin, virtually all future building construction consistent with land use and development standards set forth in [the General Plan] will obstruct views to the foothills from at least some vantage points. The criterion, however, relates to a scenic vista more narrowly defined as a view through an opening, between a row of buildings or trees, or at the end of a vehicular right-of-way. To this end, the east-west and north-south oriented roadway network and streetscapes that define them will frame and preserve scenic vistas from public rights-of-way to the distant horizons and foothills. Owing to the flatness of the basin, the view corridors extend for miles along current and planned roadways preserving scenic vistas from the broad basin to the surrounding foothills.

As previously described and shown in the site photographs presented in Figure 4.1-2 through Figure 4.1-5, the proposed building sites are vacant and undeveloped, and the eastern portion of the Project area consists of the PVSD Channel. The Project area is relatively flat and is located within the PVCCSP area, which was identified in the PVCCSP EIR Initial Study as not being within a scenic vista. Further, the

PVCCSP EIR Initial Study concluded that development allowed by the PVCCSP would not adversely impact a scenic vista.

The Project would be developed in compliance with the Standards and Guidelines summarized above and identified in the PVCCSP to address visual character. As further discussed below under Threshold c, the Project proposes the construction and operation of two warehouse buildings (Rider 2 and Rider 4) and the implementation of landscaping as required by the PVCCSP. Specifically, landscape setbacks are provided along Redlands Avenue, Rider Street, Morgan Street, which are all designated Major Roadway Visual Corridors in the PVCCSP. A landscaped linear trail is proposed north and parallel to the MWD easement, and extensive landscaping is also proposed along the eastern portion of the building sites, adjacent to the PVSD Channel, which would be widened as part of the Project. These landscape features and widened PVSD Channel are oriented in north-south and east-west directions and would preserve views of distant scenic vistas from public vantage points along the site-adjacent roadways, the proposed linear trail and MWD easement between the Rider 2 and Rider 4 buildings, and from the PVSD Channel trail. Implementation of the Project would not result in a substantial adverse effect on a scenic vista.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusion of the PVCCSP EIR Initial Study.

Threshold b Would the project substantially degrade scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The PVCCSP EIR Initial Study (Section 13, Aesthetics) concluded that no specific scenic resources such as trees, rock outcroppings, or unique features exist within the PVCCSP boundaries, which includes the Project area, and that the PVCCSP area is not located within a state scenic highway corridor (City of Perris, 2009). Consistent with the findings in the PVCCSP EIR Initial Study, the Project area is not located within the vicinity of scenic highways and no scenic resources are located on the Project area. The nearest “Officially Designated” State Scenic highway is Highway 243, located approximately 20 miles east of the Project area (Caltrans, 2019). Therefore, implementation of the Project would not substantially degrade scenic resources within a state scenic highway.

It should be noted that the Project area is in proximity to Major Roadway Visual Corridors as identified in Figure 4.0-17, Visual Overlay Zone, of the PVCCSP (City of Perris, 2018). These roadway corridors include Redlands Avenue, Rider Street, and Morgan Street. As such the Project would be required to comply with the Design Standards and Guidelines outlined in the PVCCSP, including restrictions on building height and landscaping, as further discussed under Threshold c, below.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusion of the PVCCSP Initial Study.

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

The PVCCSP EIR Initial Study (Section 13.0, Aesthetics) identifies that development of future projects in the PVCCSP area would change the visual character of the PVCCSP area from scattered residential, commercial, industrial and agricultural uses to a more modern commerce and industrial center. Further, the PVCCSP EIR Initial Study concludes that projects developed in compliance with the Design Standards and Guidelines of the PVCCSP would not substantially degrade the existing visual character or quality of the area or surrounding properties, resulting in a less than significant impact for this threshold of significance (City of Perris, 2009). In summary, Chapter 4.0 (On-Site Design Standards and Guidelines) of the PVCCSP identifies techniques and minimum standards for achieving the level of design quality that the City desires in new development within the PVCCSP area and addresses site layout for commerce zones, architecture, and visual overlay zone development standards and guidelines. Chapter 6.0 (Landscape Standards and Guidelines) outlines general on-site and off-site landscape requirements within the PVCCSP area, including landscape requirements along the MWD easement that passes between the Rider 2 and Rider 4 building sites and extends to the PVSD Channel. Chapter 8.0 (Industrial Design Standards and Guidelines) provides guidance on industrial site layout and landscaping.

Therefore, the following analysis addresses the visual change resulting from the Project and addresses the Project's compliance with the relevant PVCCSP Standards and Guidelines identified above, which are in place to ensure that future developments have aesthetic cohesiveness, incorporate superior architectural design, and improve the visual character within the PVCCSP area.

The visual impacts of a project include both the objective visual resource change created by the project and the subjective viewer response to that change. Distance from a project, frequency of view, length of view, viewer activity, viewer perception, and viewing conditions contribute to the assessment of a visual impact. The perception of different viewer groups to the visual environment and its elements varies based on viewer activity and awareness. Activities such as commuting in traffic can distract an observer from many aspects of the visual environment. Off-site views for motorists are short-lived. Conversely, pleasure driving or relaxing in a scenic environment can encourage an observer to look at the view more closely and at greater length, thereby increasing the observer's attention to detail. Sensitivity is also determined by how much the viewer has at stake in the viewshed. Typically, people who reside or own property in an area are more sensitive to change than those just passing/commuting through an area. As identified in Threshold c, the following analysis addresses public views and not private views, which the majority of existing public viewers consisting of travelers along Rider Street and the PVSD Channel.

Due to the relatively flat topography of the Project area and surrounding area, and existing development surrounding the Project area, views of the Project area are largely limited to vantage points adjacent to the site. The photographs presented in Figure 4.1-2 through Figure 4.1-5 depict the existing visual character of the Project area and surrounding area. These photographs were taken from public vantage

points adjacent to the Project area and are representative of public views from adjacent roadways, the trail along the PVSD Channel, the existing Morgan Park Phase I, and the planned Morgan Park Phase II east of the Project area (to be constructed in 2020). There are a limited number of viewers from these public vantage points.

Development of the Project area would involve the construction and operation of the following uses on the currently vacant Project area: two warehouse buildings with associated truck trailer and automobile parking lots, landscaping, and infrastructure, and the construction and subsequent operation and maintenance of improvements to the PVSD Channel along the eastern portion of the Project area. Additionally, a linear trail would be constructed north of the MWD easement, between the building sites. Implementation of the Project would result in a permanent and obvious change in the visual character of the site from its current condition (i.e., vacant land and unimproved PVSD Channel) to an urban setting with industrial warehouse/distribution uses. The site would be developed in compliance with the Standards and Guidelines outlined in the PVCCSP.

The Project's construction phase would occur for approximately 11 months. Project-related construction activities would be temporary in nature and all construction equipment would be removed from the Project area following completion of the Project's construction activities. Temporary construction-related changes to local visual character would not substantially degrade the visual quality or character of the area; construction activity is common throughout developing areas of the City of Perris.

The western portion of the Project area, which would be developed with the Rider 2 and Rider 4 buildings and associated improvements is designated for Light Industrial uses under the PVCCSP. The proposed warehouse buildings would be constructed in this portion of the Project area. As further described in Section 3.6, Project Components, of this EIR, the Rider 2 high-cube warehouse building would be approximately 804,759 gsf, and the Rider 4 high-cube warehouse building would be approximately 547,977 gsf. As identified above, Section 4.2.3 of the PVCCSP provides on-site Standards and Guidelines specifically related to architecture. The proposed buildings are designed to comply with these requirements, including scale, massing, and building relief, architectural elevations and details, roofs and parapets, and color and materials. Figures 3-6 through 3-11 in Section 3.0, Project Description, show the conceptual building elevations for the Project. While the Project's final design may differ slightly from the conceptual elevations provided in these figures, they are sufficient to assess the effect that the Project's development may have on the aesthetic character of the Project area and its surrounding area. The proposed buildings would be a maximum of 44 feet 10 inches in height above the exterior finish grade level at the top of parapet, although the roof height would vary based on the building's architectural features. These structures would be of similar height to the Rider 1 and Rider 3 buildings southwest and west of the Project area, respectively. The maximum structure height for development within the PVCCSP-designated Light Industrial areas is 50 feet (as identified in Table 4.0-1 of the PVCCSP).

The primary form of the proposed buildings would be painted concrete tilt-up panels. The finish of the buildings would have low reflectance characteristics. In general, the architectural style consists of modern industrial design. The exterior color palette would be comprised of various shades of white and gray with accent colors. The office entry areas would feature a stone veneer. The buildings have been designed with multiple areas of geometric form to provide variation in building plane and form. As shown by the building elevations, visual relief from massive building form would be achieved through fenestration, through the incorporation of windows, mullions, exterior canopies at the office entries, and through variations in height and rooflines, and the use of parapets. These various architectural elements would

effectively avoid monotony and repetition in building elevations. It should also be noted that rooftop equipment would be screened behind the parapet and would not be visible from adjacent streets.

A key component of the PVCCSP related to visual character is the establishment of a Visual Overlay Zone (refer to Figure 4.0-17 of the PVCCSP) along I-215 and major roadways to provide travelers with the impression of a high caliber, well-planned industrial community. This, in part, is accomplished through the provision of landscaped thoroughfares. Design Standards and Guidelines are provided to enhance the “visual zone,” which includes the field of vision from the roadway to the buildings. As previously identified, Morgan Street, Rider Street, and Redlands Avenue, which are adjacent to the Project area, are designated as “Major Roadway Visual Corridors” and are subject to the standards and guidelines outlined in Section 4.2.9.2, Major Roadway Visual Zones, of the PVCCSP.

The conceptual landscape plans for the Rider 2 and Rider 4 buildings are shown in Figure 3-13 and Figure 3-14, respectively, in Section 3.0, Project Description, of this EIR. The conceptual landscape plan for the linear trail north of the MWD easement is shown in Figure 3-15, and the wall and fence plan are shown in Figure 3-16. As shown, and previously described in Section 3.6.4 of this EIR, the Project would include installation of the required landscaping and screening along Morgan Street, Rider Street, and Redlands Avenue. Additionally, extensive landscaping would be provided in the eastern portion of the building sites, which would primarily be viewed from the trail along the PVSD Channel, Morgan Park, and Rider Street (Rider 2 building). The water quality features in the eastern portion of the building sites would follow the landscape requirements outlined in Section 4.2.2.7, Water Quality Site Design, of the PVCCSP. The landscaping and design of the linear trail north of the MWD easement would meet the intent of the requirements for the MWD trail outlined in Section 6.2.3, MWD Trail Landscape Standards and Guidelines, of the PVCCSP. Landscaping would consist of various species of trees, shrubs, and/or groundcover. In addition to screening views into the Project area, the landscaping has also been designed to accent the architectural design of the buildings. Decorative concrete paving (colored) and enhanced landscaping would be installed at the access driveways along Redlands Avenue, Sinclair Street, Morgan Street, and Rider Street.

As described in Section 3.6.7 of this EIR, the proposed PVSD Channel improvements primarily consist of widening the existing channel from just north of Morgan Street to just south of Rider Street, installation of a new Rider Street Bridge, and protection of the Colorado River Aqueduct (CRA; within the MWD easement) and associated MWD manholes through the use of engineered drop structure. Fifteen-foot access roads would be constructed on each side of the Channel and the eastern access road would also serve as a regional trail (replacing the existing trail to be removed). The PVSD Channel would be earthen except in the vicinity of the engineered drop structure and Rider Street bridge, where it would have concrete side slopes. The proposed channel and bridge improvements would be at or below the ground surface, and wet and dry utility infrastructure within the building sites would be placed underground. Any above ground utility facilities would be screened from public views. Additionally, landscaping would be installed along the proposed regional trail, which would further screen views in the building sites.

In summary, although the visual character of the Project area would change, the Project would be designed and constructed in compliance with applicable PVCCSP standards and would result in the development of the site in an attractive, well-designed manner using architectural elements, landscaping, and Project design. The streetscapes and screening adjacent to the Project area would be the primary visual focal point for motorists traveling along Morgan Street, Rider Street, and Redland Avenue. Landscaping and screening would also be the primary focal points for trail users and other public views

of the eastern portion of the Project area. Therefore, the development of the Rider 2 and Rider 4 building and associated Project features, and PVSD Channel improvements would not degrade the visual character or quality of public views of the Project area and its surroundings.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusion of the PVCCSP EIR Initial Study.

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

The PVCCSP EIR Initial Study (Section 13, Aesthetics) concluded that development of the PVCCSP land uses would introduce new sources of nighttime light and glare into the area from street lighting and from outdoor lighting from the planned uses, but that compliance with applicable lighting regulations and use of lighting shield and other design features on light fixtures within the PVCCSP area would ensure that impacts associated with light and glare are less than significant (City of Perris, 2009).

As previously identified, the Project area is currently undeveloped and PVSD Channel extends along the eastern portion of Project area. As such, there are no permanent sources of light that exist on the Project area. The temporary construction trailers include exterior lighting for security purposes. Existing sources of lighting in the surrounding area primarily include exterior lighting associated existing development, and street lights at the existing Rider Street bridge. There are no existing building or other man-made features on or near the Project area that are constructed of materials that cause substantial glare.

It should be noted that, to prevent conflicts with aircraft operations at the MARB/IP Airport, all lighting and building materials installed as part of the Project would comply with the requirements outlined in PVCCSP EIR mitigation measures MM Haz 3 and MM Haz 5 (identified above), which are incorporated into the Project. In summary, light fixtures are required to be hooded or shielded to prevent either the light spillover or reflection into the sky, and lights that direct a steady light or flashing light or cause sunlight to be reflected towards an aircraft during takeoff or final approach for landing are prohibited.

Light

Construction-Related

Project-related construction activities would comply with applicable provisions of the City’s Municipal Code. Notably, Section 7.34.060 (Construction Noise) of the City’s Municipal Code prohibits construction activity that may result in “disturbing, excessive, or offensive noise levels between the hours of 7:00 PM and 7:00 AM”. While construction activities are not expected to occur during these hours, night time lighting would be needed at certain times depending on the time of year and depending on the stage of construction. Additionally, nighttime lighting of construction staging areas would be needed to provide security for construction equipment and construction materials. This type of temporary lighting is often

unshielded and may shine onto adjacent properties and roadways. Due to the proximity of single-family residences to the Project area (including non-confirming residences to the south and existing residential uses to the east), such security lighting may cause a significant impact in the form of a nuisance to the residents. As identified in Section 3.6.8, Construction Activities, and further required by mitigation measure MM 1-1, construction staging areas would be located as far as possible from the existing residences to the east and south of the Project area to minimize light intrusion. Mitigation measure MM 1-1 also requires that temporary nighttime lighting installed for security purposes be downward facing and hooded or shielded to prevent security lighting from spilling outside the staging area or from directly broadcasting security lighting into the sky or onto adjacent residential properties. With implementation of mitigation measure MM 1-1, this impact would be reduced to a less than significant level.

Operational-Related

As described in Section 3.0, Project Description, development of the Project with industrial uses would introduce new permanent sources of light into the area in the form of signage, building lighting, and parking lot lighting for nighttime operations, security, and safety. Lighting in loading areas would consist of building-mounted lighting. Exterior lighting would be similar to that provided for the Rider 3 building (immediately west of the Project area) and other warehouse uses in the PVCCSP area; the lighting plans for the proposed Rider 2 and Rider 4 buildings are shown on Figures 3-19 and 3-20 in Section 3.0 of this EIR. Additionally, street lighting would be installed along Rider Street and Morgan Street as part of this Project; street lighting along Redlands Avenue is being installed as part of the Rider 3 Project.

All development in the PVCCSP area, which includes light generated from industrial buildings and parking lots, is required to adhere to lighting requirements contained in the PVCCSP. The PVCCSP requires compliance with Riverside County Ordinance No. 655 and City of Perris Municipal Code Section 19.02.110.

As previously indicated, through its Ordinance No. 655, the County of Riverside has established two nighttime lighting zones that create a radius around the Mount Palomar Observatory. While not located in unincorporated Riverside County, astronomical observations at the Mount Palomar Observatory would be affected by cumulative increases in lighting sources. The nighttime lighting zones were created to ensure that the astronomical observations at the Mount Palomar Observatory would not be affected by light pollution coming from urban development. Zone A encompasses a 15-mile radius centered on the Mount Palomar Observatory, while Zone B encompasses a larger area with a 45-mile radius and extends from the outer limit of Zone A to the end of the 45-mile radius area. Since the Mount Palomar Observatory is located approximately 38 miles southeast of the Project area, the Project area is located within Zone B of the Mount Palomar Nighttime Lighting Policy Area. Ordinance No. 655 restricts the permitted use of certain light fixtures emitting undesirable light rays into the night sky, which may have a detrimental effect on astronomical observation and research at the Mt. Palomar Observatory. As stated in Section 5(A) of Ordinance No. 655, "low-pressure sodium lamps are the preferred illuminating source" in the Mount Palomar Nighttime Lighting Policy Area. Other types of lighting systems are permitted in parking areas if they do not exceed 4,050 lumens. Lighting "allowed" under Ordinance No. 655 must be fully shielded and focused to avoid spill light into the night sky and onto adjacent properties. (Riverside County, 1988)

The Project would be required to comply with lighting requirements outlined in Section 4.2.4, Lighting, of the PVCCSP, which identifies that any illumination, including security lighting, shall utilize full-cutoff lighting fixtures that are directed away from adjoining properties and the public right-of-way. The PVCCSP

also requires that parking area lighting associated with the Project be designed pursuant to the Perris Municipal Code Section 19.02.110, which includes requirements for installation of energy-efficient lighting as well as shielding of parking lot lights to minimize spillover onto adjacent properties and right-of-way.

These lighting requirements are uniformly applied to all development in the PVCCSP area. As such, adherence to these lighting requirements would be mandatory and enforceable through the review and approval of the project plans. Adherence to the City's PVCCSP would ensure that the Project's lighting would not significantly affect adjacent uses. Therefore, operational lighting impacts would be less than significant and no mitigation would be required.

Glare

Glare is caused by light reflections from pavement, vehicles, and building materials such as reflective glass and polished surfaces. During daylight hours, the amount of glare depends on the intensity and direction of sunlight. Glare can create hazards to motorists and can be a nuisance for pedestrians and other viewers. The PVCCSP Standards and Guidelines related to colors and materials (Section 4.2.3.5) encourage the use of low-reflectance facades and prohibits metal siding where visible from the public. Allowed building materials generally include wood, brick, native stone, and tinted/textured concrete. Further, as identified in Section 12.1.3, Compatibility with March ARB/IP ALUCP, of the PVCCSP, any use that would cause sunlight to be reflected towards an aircraft engaged in a climb following takeoff or descent towards a landing at an airport is prohibited. As identified in the building elevations presented in Section 3.6 of this EIR, the buildings would be constructed of painted concrete tilt-up panels and low-reflective materials, including low-reflective glass. Compliance with the requirements of the PVCCSP related to building materials would ensure that glare does not create a nuisance to on- and off-site viewers of the Project area or aircraft traveling to or from the MARB/IP Airport. The Project would not create a new source of substantial glare. This impact would be less than significant and no mitigation is required.

Additional Project-Level Mitigation Measures

MM 1-1 Prior to the issuance of grading permits, the Property Owner/Developer shall provide evidence to the City that the Contractor Specifications require that: (1) construction staging areas shall be located as far as possible from residences east and south of the Project area; and, (2) any temporary nighttime lighting installed during construction for security or any other purpose shall be downward facing and hooded or shielded to prevent security light from spilling outside the staging area or from directly broadcasting security light into the sky, onto adjacent residential properties, or into the PVSD Channel. Compliance with this measure shall be verified by the City of Perris' Building Division during construction.

Level of Significance After Mitigation

With implementation of the mitigation measure identified above, this impact would be less than significant. This is consistent with the conclusions of the PVCCSP EIR Initial Study.

4.1.5 CUMULATIVE IMPACTS

Development within the City of Perris, including development within the PVCCSP area, which includes the Project area, and the May Ranch and New Horizons Specific Plan area east of the Project area, have

previously and will continue to result in the cumulative conversion of land that is currently undeveloped to a more urbanized land use. However, this is a continuing development trend currently occurring within the City that has been anticipated in the City's General Plan and approved Specific Plan areas. As shown in Figure 4.11-1, Perris Valley Commerce Center Specific Plan Land Use Designations, in Section 4.11, Land Use and Planning, of this EIR, the area south of the Project area is planned for development with an additional Light Industrial uses, similar to the Project, and the area north of the Project area is planned for Business Professional Office uses. Construction of the Rider 1 and Rider 3 buildings, west and southwest of the Project area, were recently completed. The City plans to construct Morgan Park Phase II, which will consist of a lighted soccer field and parking lot, east of the Project area (south of Morgan Road), in the New Horizons Specific Plan area.

Cumulative projects in the same viewshed as the Project would be considered to result in a cumulative aesthetic impact. If the projects were not near each other, the viewer would not perceive them in the same scene and they would not result in a cumulative change in the visual character. Because the Project area and surrounding areas are within the PVCCSP, May Ranch and New Horizons Specific Plans areas, future development — which would contribute to a cumulative visual change along with the Project — would be required to comply with the standards and guidelines identified in the respective Specific Plans, and with applicable City regulations. The PVCCSP EIR concludes that development of the land uses identified in the PVCCSP, including development of the Project area, would not result in cumulative aesthetic impacts.

As previously noted, the PVCCSP area, which includes the Project area, is not located within a scenic vista. The City's General Plan EIR acknowledges that east-west and north-south roads and streetscapes preserve scenic vistas in developed areas. The Project, which complies with PVCCSP requirements for Major Roadway Visual Corridors along Rider Street, Morgan Street and Redlands Avenue, and further provides visual access to scenic vistas along the proposed linear trail and widened PVSD Channel, would have a less than significant impact on scenic vistas and would not result in a cumulatively considerable contribution to a significant aesthetic impact related to scenic vistas.

The Project area and surrounding areas are not located within proximity to any State scenic highways or eligible State scenic highways. Additionally, the Project area does not contain any scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings and would have no impact to such resources. Therefore, the Project would not result in a cumulatively considerable contribution to a significant aesthetic impact related to scenic resources within a scenic highway.

As analyzed in this section, the Project would have a less than significant impact related to degradation of the visual character of the Project area. Because development in the same viewshed as the Project would be required to comply with the applicable standards and guidelines set forth in the PVCCSP, including requirements related to architectural design and landscaping, or similar design requirements outlined in other Specific Plans or City regulations, these projects would also conform to the overall visual theme of the area. The Project would not result in a cumulatively considerable contribution to a significant aesthetic impact related to substantial degradation of the existing visual character or quality of public views of the site.

As with existing development in the area, light and glare impacts from the Project and future development in the City, including the development allowed by approved Specific Plans, including the PVCCSP, would be reduced through the adherence to applicable lighting standards established in the respective Specific

Plans and through City regulations; applicable PVCCSP and City regulations are outlined in this section. Implementation of mitigation measure MM 1-1 would ensure that construction-related lighting impacts from the Project are also less than significant. The Project would not result in a cumulatively considerable contribution to a significant aesthetic impact related to light and glare.

4.1.6 REFERENCES

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City of Perris, 2004. *Draft Environmental Impact Report City of Perris General Plan 2030, State Clearinghouse #2004031135*. October 2004, certified April 26, 2005.

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City of Perris, 2018. *Perris Valley Commerce Center Amendment No. 9 Specific Plan*. May 2018, adopted January 10, 2012, and subsequently amended and approved August 28, 2018. Available at <https://www.cityofperris.org/Home/ShowDocument?id=2647>

City of Perris, 2019. *Morgan Park Phase II Categorical Exemption Report*. December 2019. Available at <https://www.cityofperris.org/Home/ShowDocument?id=1433>

GLA, 2019. Glenn Lukos Associates, Inc. *Biological Technical Report for Rider 2 and Rider 4 Warehouse Project Located in the City of Perris, Riverside County, California*. November 12, 2019. Included in Appendix C of this EIR.

GLA, 2020. Glenn Lukos Associates, Inc. *Biological Technical Report for Phase 1 Perris Valley Storm Drain Channel Improvement Project Located in the City of Perris, Riverside County, California*. March 13, 2020. Included in Appendix C of this EIR.

Riverside County, 1988. *Riverside County Ordinance No. 655 Regulating Light Pollution*. Adopted June 7, 1988. Available at <https://www.rivcocob.org/ords/600/655.htm>

4.2 AGRICULTURE AND FORESTRY RESOURCES

This section addresses the potential impacts to agricultural resources resulting from the Project. The analysis in this section is primarily based on information obtained from the California Department of Conservation (DOC), the City of Perris General Plan, and the City of Perris Zoning Map; references used are listed below in Section 4.2.6.

The Notice of Preparation (NOP) comment letter from the California Department of Conservation identifies that the Project area includes Farmland of Statewide Importance (consistent with information presented in the NOP), and requests that the following items be addressed in the Environmental Impact Report (EIR): farmland conversion resulting from the Project, impacts on agricultural activities in the vicinity, cumulative impacts on agricultural land, and mitigation measures for impacted agricultural lands.

4.2.1 EXISTING SETTING

Section 4.1, Agricultural Resources, of the Perris Valley Commerce Center Specific Plan (PVCCSP EIR), includes a discussion of the environmental setting for agricultural resources, including an overview of agricultural activities in the PVCCSP area and surrounding areas, and a description of Designated Farmland.

Section 21060.1, of the California Public Resources Code (PRC) defines agricultural land as follows: "Agricultural land means prime farmland, farmland of statewide importance or unique farmland, as defined by the United States Department of Agriculture land inventory and monitoring criteria, as modified for California." This EIR utilizes this definition for evaluating impacts associated with the loss of agricultural lands as a result of the Project.

Agricultural Resources

Regional Agricultural Setting

As identified in the PVCCSP EIR, agriculture has long been a major foundation of the economy and culture of Riverside County; however, its role has been diminishing in the western portion of the County. While the total planted acreage in Riverside County increased from 188,019 acres in 2017 to 194,346 acres in 2018 (RCACO, 2018), the total planted acreage has decreased from 246,012 acres in 2008 (City of Perris, 2011). Riverside County is divided into four districts by the Riverside County Agricultural Commission. The City of Perris is in the San Jacinto/Temecula Valley District. Total agricultural production in the District in 2018 was valued at about \$1.53 million, compared to \$1.56 million in 2017 (RCACO, 2018). Based on inventories of agricultural acreage prepared by as part of the DOC's Farmland Mapping and Monitoring Program (FMMP), further discussed below, the amount of Prime Farmland, Farmland of Statewide Importance and Unique Farmland in the County decreased by approximately 37 percent between 1984 and 2016 (DOC, 2016).

City of Perris and Perris Valley Commerce Center Specific Plan Area Agricultural Setting

The City of Perris began as a farming community on the California Pacific Railroad line. The City was a stopover on the California Southern and later Santa Fe Railroad, and made its reputation with grain, fruit and vegetables crops in Riverside County and throughout the region. Because of limited groundwater,

dry grain farming was the main crop before water was brought to the valley by the Eastern Municipal Water district in the early 1950's. Notably, alfalfa, potatoes, onions and later grapes have been predominant crops in Perris (City of Perris, 2020). High-yield consumer cash crops are not a principal characteristic of the City's agricultural production or economy. As further discussed below, with the exception of 1 small parcel (less than 10 acres), there are currently no areas in the City that are designated for long-term agricultural production.

When the PVCCSP EIR was prepared, approximately 2,435.5 acres of the approximately 3,500-acre PVCCSP area (69 percent) was designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland or Farmland of Local Importance (City of Perris, 2011). Subsequent to approval of the PVCCSP EIR in 2012, farmland in the PVCCSP area has continued to transition to non-agricultural uses.

Project Area and Surrounding Areas

Based on site reconnaissance conducted in September 2019, the Project area is not currently being used for agricultural production. Based on review of aerial photographs, the Rider 4 building site and eastern portion of the Rider 2 building site were under agricultural production through 2014, but agricultural production had ceased by 2016. Consistent with the land use planning for the City and the PVCCSP area, much of the area surrounding the Project area has been converted to non-agricultural uses, or is under construction. There are currently no areas under agricultural production near the Project area (refer to Figure 4.2-1, Zone of Influence).

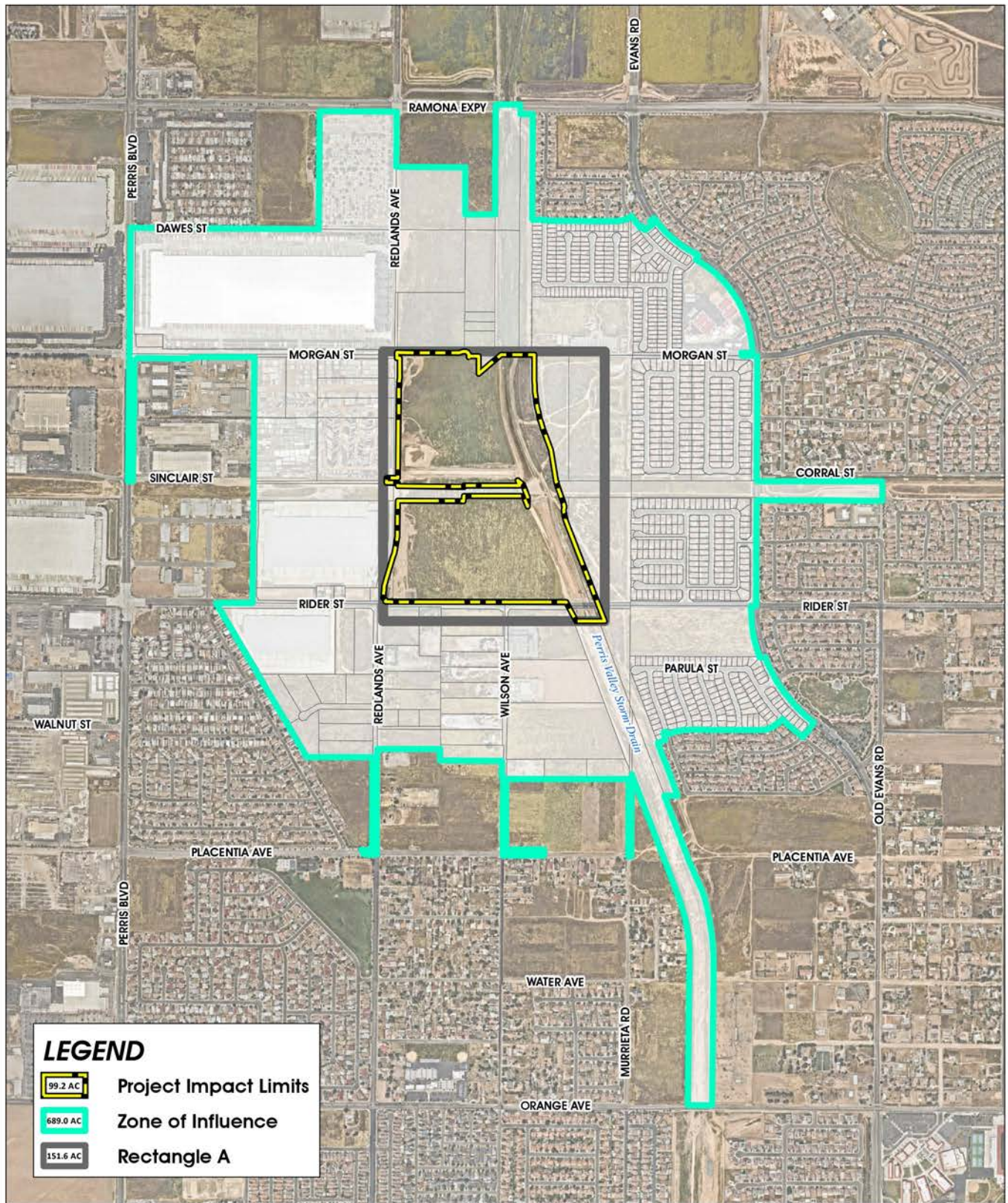
Project Area Agriculture Productivity Potential

A property's agricultural productivity potential is primarily determined by the quality of the site's soils. High-quality, productive soils have a higher likelihood to correspond with an important agricultural resource than do low-quality soils. The Project area's soil types, and their respective agricultural productivity rankings, are discussed below.

□ On-Site Soils

Figure 4.2-2, Soils Map, illustrates the distribution of soils across the Project area. The mapping symbols shown on Figure 4.2-2 correspond to the United States Department of Agriculture (USDA) soil series classifications. Provided below is a description of the soils found within the Project area (USDA, 2020).

- **Du – Domino Silt Loam.** Approximately 5.0 acres (5.0 percent) of the Project area contains Domino Silt Loam. This soil is characterized as moderately well drained with slow permeability and is found in basin areas with up to 2 percent slopes. This soil type has severe limitations that could limit the choice of plants (or require special practices) and contains shallow, droughty, and/or stony soil.
- **Dv – Domino Silt Loam, Saline-Alkali.** Approximately 88.7 acres (89.4 percent) of the Project area contains Domino Silt Loam, Saline-Alkali. This soil type is characterized as moderately well drained with slow permeability and is found in basin areas with up to 2 percent slopes. This soil type has severe limitations that could limit the choice of plants (or require special practices) and contains shallow, droughty, and/or stony soil.

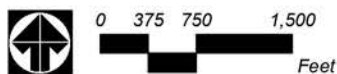


LEGEND

- 99.2 AC Project Impact Limits
- 689.0 AC Zone of Influence
- 151.6 AC Rectangle A

Source(s): Nearmap Aerial (2019), RCLMA (2019)

Figure 4.2-1

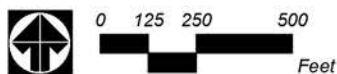


Zone of Influence



Source(s): Nearmap Aerial (2019), RCLMA (2019)

Figure 4.2-2



Soils Map

- **EpA – Exeter Sandy Loam, deep, 0 to 2 percent slopes.** Approximately 0.1 acre (less than 1 percent) of the Project area contains Exeter Sandy Loam, deep, 0 to 2 percent slopes. This soil is characterized as well drained with moderately slow permeability above the duripan. This soil type has severe limitations that could limit the choice of plants (or require special practices) and contains a risk for erosion.
- **W – Water.** Approximately 5.4 acres (5.4 percent) of the Project area contains water from the PVSD Channel, located in the eastern portion of the Project area.

☐ **Storie Index**

The Storie Index is a rating system that determines the value of farmland by evaluating the soil type on a given property. The Storie Index rating system ranks each soil according to four general factors: (1) the characteristics of the soil profile and its depth; (2) the texture of the surface soil; (3) the slope of the land on which the soil is located; and (4) other factors, including drainage, salt content, erosion, and alkali. A score ranging from 0 to 100 percent is determined for each factor, and the scores are then multiplied together to derive an index rating. Soils are graded according to their index on a scale of 1 through 6 (UC Berkeley, 1978).

Soils of Grade 1 (excellent) rate between 80 and 100 percent and have few or no limitations that restrict their use for crops. Soils of Grade 2 (good) rate between 60 and 79 percent and have few special management needs and are suitable for most crops, but they have minor limitations that narrow the choice of crops. Grade 3 (fair) soils rate between 40 and 59 percent and are suited to a few crops or to special crops and require special management. Grade 4 (poor) soils rate between 20 and 39 percent and are severely limited for crops, and if used, it requires careful management. Grade 4 (poor) soils rate between 20 and 39 percent and are severely limited for crops, and if used, it requires careful management. Grade 5 (very poor) soils rate between 10 and 19 percent and generally are not suited to cultivated crops but can be used for pasture and range. Grade 6 (nonagricultural) consists of soils and land types that rate less than 10 percent and generally are not suited to farming (UC Berkeley, 1978).

The Storie Index rating for the Project area’s soil types is presented on Table 4.2-1, Project Area Soils Summary.

☐ **Land Capability Classification**

Similar to the Storie Index, the Land Capability Classification (LCC) is used to determine the soil’s suitability for crop production. The LCC includes eight classes identified as “I” through “VIII,” with soils designated as “I” being the most suitable for crop production. Additionally, the LCC includes four subclasses to identify the soil’s limitation, including susceptibility to erosion (e) and limitations due to water (w), shallow/stony soils (s), or climate (c) (USDA, 2020). The LCC rating for each of the Project area’s soil types is also presented on Table 4.2-1.

Table 4.2-1 Project Area Soils Summary

Map Symbol	Mapping Unit Name ¹	Acreage	% of Project Area	Storie Index ²	Land Compatibility Classification ¹
Du	Domino Silt Loam	5.0	5.0	33.3	IIIs
Dv	Domino Silt Loam, Saline-Alkali	88.7	89.4	17	IIIs
EpA	Exeter Sandy Loam, deep, 0 to 2 percent slopes	0.1	<1	33.5	IIs ³
W	Water	5.4	5.0	N/A	N/A

¹Source for the Project area's mapping unit names and land compatibility classifications: (USDA, 2020)
²Source for the Project's soil storie indices: (UC Davis, 2020)
³Within the Project area, areas with EpA soil is not irrigated; therefore, the non-irrigated LCC is listed.

Farmland Mapping

As further discussed under Section 4.2.2, Existing Policies and Regulations, below, the Farmland Mapping and Monitoring Program (FMMP) administered by the DOC's Division of Land Resource Protection divides the state's land into eight categories based on soil quality and existing agricultural uses to produce maps and statistical data. Based on review of the 2016 FMMP, the Project area contains approximately 75.9 acres of "Farmland of Statewide Importance," approximately 23.2 acres of "Farmland of Local Importance," and approximately 0.1-acre of "Urban and Built-Up Land" (refer to Figure 4.2-3, FMMP Farmlands Map).

Forestry Resources

According to the PVCCSP (Figure 2.0-1, Specific Plan Land Use Designations), there are no areas within the PVCCSP, including the Project area, designated for forest land (City of Perris, 2018). Further, the Project area does not contain forest land or any vegetation communities associated with forest land (GLA, 2020; GLA, 2019).

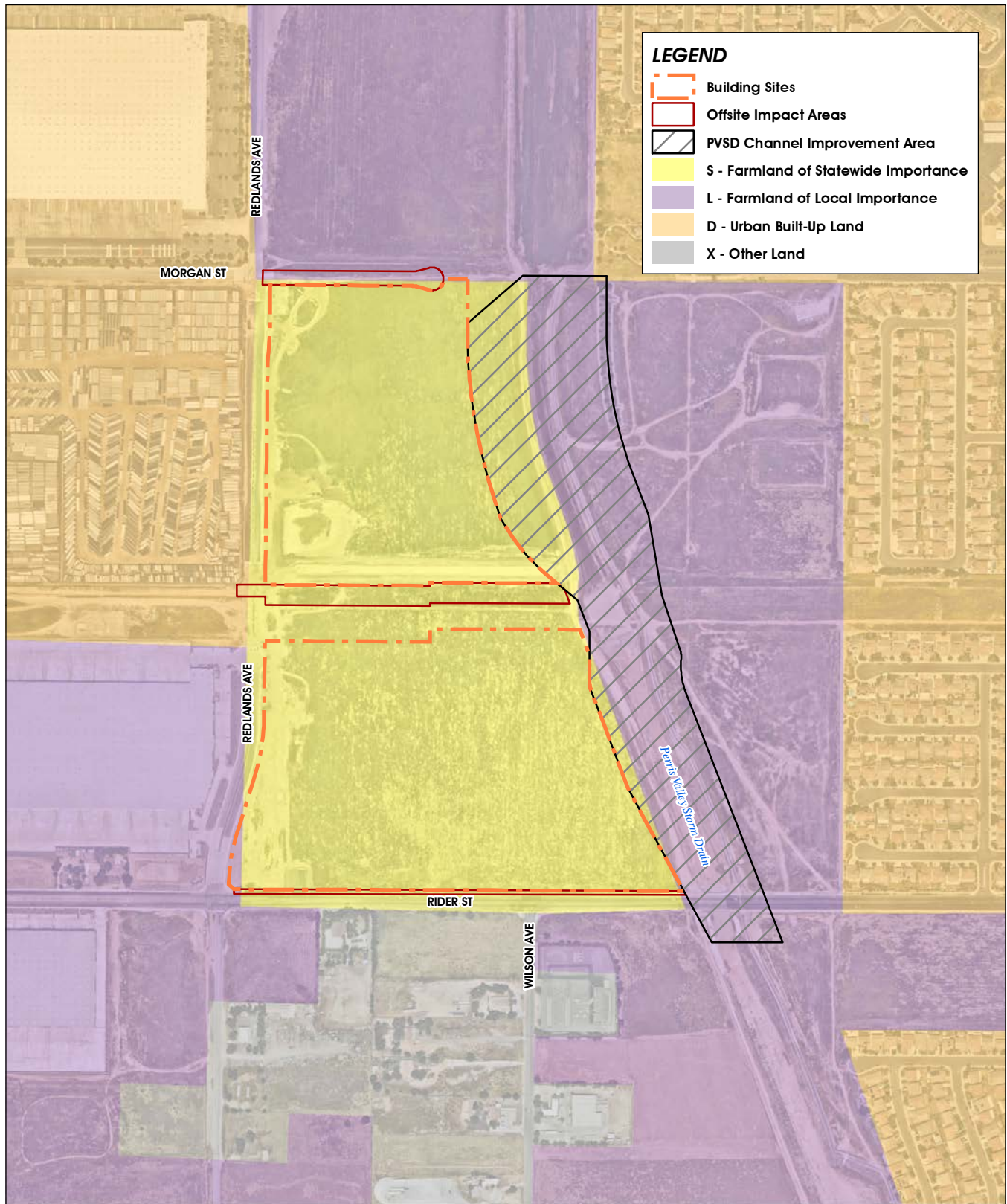
4.2.2 EXISTING POLICIES AND REGULATIONS

Following is a discussion of relevant policies and regulations applicable to development in the City of Perris, including the Project area.

State

California Land Conservation Act

The California Land Conservation Act of 1965, also referred to as the Williamson Act, is a non-mandated State program administered by Counties and Cities for the preservation of agricultural land. This program enables local governments to enter into contracts with private landowners to restrict specific parcels of land to agricultural or related open space use. In return, landowners receive much lower property tax assessments than normal because the assessments are based upon farming and open space uses rather than full market value.



Source(s): ESRI, FMMP (2016), Nearmap Aerial (2019)

Figure 4.2-3



FMMP Farmlands Map

Participation in the program is voluntary on the part of both landowners and local governments, and it is implemented through the establishment of agricultural preserves and the execution of Williamson Act contracts. Individual property owners enter into a contract that restricts or prohibits development of their property to non-agricultural uses during the term of the contract in return for lower property taxes. Initially signed for a minimum ten-year period, the contracts are automatically renewed each year for a successive minimum ten-year period unless a notice of non-renewal is filed, or a contract cancellation is approved by the local government.

In Riverside County, establishing an agricultural preserve requires 100 contiguous acres under one or more ownerships. Landowners with less than 100 acres may apply for annexation to an existing agricultural preserve having a common boundary with their property. The minimum parcel size for annexation to a preserve is ten acres. The property to be included in an agricultural preserve must also have agricultural zoning. (RCACCR, 2020)

As shown in Figure 4.1-2, Agricultural Preserves, of the PVCCSP EIR, approximately 29 parcels encompassing 204 acres were under Williamson Act contracts in the PVCCSP area when the PVCCSP EIR was prepared (City of Perris, 2011). The Project area and surrounding areas are not identified as being subject to a Williamson Act contract. It should also be noted that notices of non-renewal have been filed or cancellations are being processed for the properties currently under Williamson Act contracts. Therefore, there are no areas within the City where additional property can be annexed to existing preserve areas.

Farmland Mapping and Monitoring Program (FMMP)

The FMMP is a non-regulatory program administered by the DOC's Division of Land Resource Protection. It provides a consistent and impartial analysis of agricultural land use and land use changes throughout California. The FMMP provides land use conversion information for decision makers to use in their planning for present and future use of California's agricultural land resources. Land use and soil data are combined to create Important Farmland Maps, which are updated every two years (by June 30 of each even-numbered year).

The FMMP divides the state's land into eight categories based on soil quality and existing agricultural uses to produce maps and statistical data. These are used to help preserve productive farmland and to analyze impacts on farmland. While the categories of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land represent agricultural land, the remaining categories are used for reporting changes in land use as required for FMMP's biennial farmland conversion report. The FMMP mapping categories are classified as follows (DOC, 2020):

- **Prime Farmland (P):** Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Farmland of Statewide Importance (S):** Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

- **Unique Farmland (U):** Farmland of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.
- **Farmland of Local Importance (L):** Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee.
- **Grazing Land (G):** Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit for Grazing Land is 40 acres.
- **Urban and Built-Up Land (D):** Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.
- **Other Land (X):** Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded by urban development and greater than 40 acres is mapped as Other Land.

As previously shown on Figure 4.2-3, FMMP Farmlands Map, the Project area contains "Farmland of Statewide Importance," "Farmland of Local Importance," and "Urban and Built-Up Land."

Local

City of Perris General Plan

The City's 1991 General Plan Land Use Element re-designated all agricultural lands in the City for uses other than agriculture, thereby eliminating the City's General Plan "agricultural" land use designation. The EIR accompanying the City's 1991 General Plan determined that the conversion of agricultural land to nonagricultural uses represented a significant cumulative impact. As the transition from agricultural to more urban and suburban uses continues, the extent to which agriculture and supporting economic activities contribute to the economic base of the City is reduced. In its adoption of the 1991 General Plan, the City recognized that these losses were offset by the economic activities and social benefits that typically accompany urban development. To support the conclusion that a significant cumulative impact would result from implementation of the 1991 General Plan, the City adopted findings and facts and a Statement of Overriding Considerations indicating that social and economic factors outweighed the significant cumulative impacts associated with conversion of agricultural land to non-agricultural use.

The EIR accompanying the City's 2005 General Plan Update did not identify any significant impacts to agricultural resources. As stated in the Initial Study that preceded preparation of the City's 2005 General Plan EIR (City of Perris, 2004):

Areas surrounding existing agricultural uses have been or will be developed for nonagricultural, urbanized uses. All properties in agricultural production are designated for similar, non-agricultural urbanized uses. The project General Plan will replace the 1991 General Plan whose Land Use Element included no “agricultural” designation. Therefore, adoption and implementation of the project General Plan will have no impact.

The Comprehensive General Plan 2030 approved in 2005 also does not include any agricultural land use designations, with the exception of one small parcel that is designated “Light Agriculture”. The City’s long-range planning goal as demonstrated through the Land Use Plan is to ultimately convert all existing Farmland in the City to nonagricultural uses rather than support the continuation of agricultural uses, which are becoming less economically viable. The City is focusing on developing land in an economically productive way that would serve the growing population. Notably, Goal I, Agricultural Resources, of the General Plan Conservation Element states “Orderly conversion of agricultural lands to other approved land uses”.

The Project area is designated “Specific Plan” in the *City of Perris General Plan*. The specific policies outlined in the City’s General Plan that are related to agriculture and forestry resources and that apply to the Project are listed in Table 4.11-2, General Plan Consistency Analysis, in Section 4.11, Land Use and Planning, of this EIR.

City of Perris Municipal Code

Zoning

The Project area is designated PVCCSP – Perris Valley Commerce Center Specific Plan – on the City’s Zoning Map (updated October 2016) (Perris, 2016). There is only one parcel zoned A-1, Light Agriculture, on the City’s Zoning Map; this is the same parcel designated Light Agriculture in the City’s General Plan and it is not located in the vicinity of the Project area (City of Perris, 2016).

Chapter 19.74. - Agricultural Preserve Procedures

According to City of Perris Municipal Code Chapter 19.74, the City has authorization to designate suitable areas of the City as agricultural preserves by resolution of the City Council pursuant to the Williamson Act of 1965 (Government Code section 51200 et seq.) for the purpose of establishing agricultural and compatible land uses (Perris, 2019). As previously identified, the Project area is not designated within an area under a Williamson Act contract.

4.2.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on agriculture and forestry resources if it will:

- 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(9)), 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 loss of forest land or conversion of forest land non-forest use; and
- 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.

Appendix G of the State CEQA Guidelines identifies that in determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment (LESA) Model (1997) prepared by the California DOC as an optional model to use in assessing impacts on agriculture and farmland. The LESA model is a point-based approach used to rate the relative value of agricultural land resources. The California LESA model considers the following factors: land capability, Storie index soil rating system, water availability (drought and non-drought conditions), land uses within ¼ mile, and “protected resource lands” (e.g., Williamson Act lands) surrounding the property. The determination regarding the significance of the Project’s potential impacts to farmland under Thresholds a and e is based on the DOC’s LESA Model.

Two Land Evaluation (LE) factors are based on soil resource quality, and four Site Assessment (SA) factors provide measures of a given project’s size, water resources availability, surrounding agricultural lands, and surrounding protected resources land. Each of these factors is separately rated on a 100-point scale. The factors are then weighted relative to one another and combined, resulting in a single numeric score with a maximum attainable score of 100 points. This score becomes the basis for making a significance determination regarding the conversion of agricultural lands to non-agricultural uses based on a set of scoring thresholds (DOC, 1997). The scoring thresholds are summarized in Table 4.2-2.

Table 4.2-2 California LESA Model Scoring Thresholds

Total LESA Score	Scoring Decision
0 to 39	Not Considered Significant
40 to 59	Considered Significant <u>only</u> if LE <u>and</u> SA subscores are <u>greater</u> than or equal to 20 points
60 to 79	Considered Significant <u>unless</u> either LE <u>or</u> SA subscore is <u>less</u> than 20 points
80 to 100	Considered Significant

Source: (DOC, 1997)

4.2.4 ENVIRONMENTAL IMPACTS

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

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

Impact Analysis

Threshold a Would the Project 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?

The PVCCSP EIR (Section 4.1, Agricultural Resources) identifies that development of future projects in the PVCCSP area would result in the conversion of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance to non-agricultural uses. However, that Farmland conversion was previously addressed in the EIR prepared for the City of Perris’ 1991 General Plan and the impact was determined to be significant and unavoidable. In the Perris General Plan 2030 EIR (certified in 2005) it was concluded that there would be no new significant impacts related to the conversion of farmland to non-agricultural resources (City of Perris, 2011; City of Perris, 2004).

As previously identified and shown on Figure 4.2-3, based on the most recent FMMP data available for Riverside County (2016) the Project area contains approximately 75.9 acres of “Farmland of Statewide Importance,” approximately 23.2 acres of “Farmland of Local Importance,” and 0.1-acre of “Urban and Built-Up Land” (DOC, 2020).

As identified previously, to quantify a development project’s potential impacts on agricultural resources, the DOC has developed the LESA Model, a method of rating the relative quality of land resources and potential impacts to agricultural resources. The LESA model is intended to provide lead agencies with a method of identifying potentially significant impacts that may result from agricultural land conversions. To ensure potential impacts to adjacent agricultural activities are appropriately considered, the LESA model requires an examination of land use on all parcels in a Zone of Influence (ZOI), which includes the entire area of all parcels (excluding the Project area) within or intersecting a one-quarter-mile buffer around the “smallest rectangle” or, in this case a square, that can fully contain the Project area. Figure 4.2-1, Zone of Influence, illustrates the ZOI for the Project area. The ZOI includes a total of 689 acres; none of these areas are currently producing agricultural crops. For any site evaluated using the LESA model, the factors are rated, weighed, and combined, resulting in a single numeric score that becomes the basis for determining a project’s potential significance.

The Project’s LESA score is summarized on Table 4.2-3, LESA Score Sheet. As shown on Table 4.2-3, the Project area received a LE subscore of 18.52 and a SA subscore of 26.06, which sums to a final LESA score of 44.58. Pursuant to the LESA Model scoring system, a final LESA score between 40 to 59 points corresponds to a significant impact when both the LE and SA factor scores are each equal to or greater than 20. Because the Project area received a final LESA score of 44.53, with the LE factor score less than 20, the Project’s the conversion of Farmland to a non-agricultural use would be less than significant.

Table 4.2-3 LESA Score Sheet

	Factor Scores	Factor Weight¹	Weighted Factor Scores
LE Factors			
Land Compatibility Classification	57.08 ²	0.25	14.27
Storie Index	17.00 ³	0.25	4.25
	<i>LE Subscore</i>	<i>0.50</i>	<i>18.52</i>
SA Factors			
Project Size	80.00 ⁴	0.15	12.00
Water Resource Availability	100 ⁵	0.15	15.00
Surrounding Agricultural Land	0 ⁶	0.15	0
Protected Resource Land	0 ⁷	0.05	0
	<i>SA Subscore</i>	<i>0.50</i>	<i>26.06</i>
Final LESA Score			44.58
¹ Defined by LESA Model. ² Approximately 93.7 acres of the site has a LCC classification of IIIs, which corresponds to a LESA LCC rating of 60; approximately 0.05 acres of the site has a LCC classification of IIs, which corresponds to a LESA LCC rating of 80; and the remaining acres of the site is water, which would not have a LESA LCC rating. The weighted LCC score for the site is 57.08. ³ Approximately 5.03 acres of the site has a Storie Index of 1.67; approximately 88.67 acres of the site has a Storie Index of 15.3; and approximately 0.05 acres of the site has a Storie Index of 0.03. The adjusted score for the site is 17.0. ⁴ The site contains between 80-119 acres of LCC Class III soils, which corresponds to a LESA score of 80 points. The site contains less than 10 acres of LCC Class II soils, which corresponds to a LESA score of 0 points. ⁵ The entire Project area is assumed to have access to water without restrictions during non-drought and drought years, which corresponds to a LESA score of 100 points. ⁶ None of the site's approximately 689-acre Zone of Influence (ZOI) is under agricultural production, which corresponds to a LESA score of 0 points. ⁷ None of the site's approximately 689-acre ZOI is protected agricultural land, which corresponds to a LESA score of 0 points.			

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

Threshold b Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The PVCCSP EIR (Section 4.1, Agricultural Resources) concluded that consistent with the conclusion of the General Plan EIR, implementation of the PVCCSP would not conflict with existing zoning for agricultural use or a Williamson Act Contract (City of Perris, 2011).

According to the City of Perris Zoning Map, the Project area is not zoned for agricultural use; the Project area is zoned for Light Industrial and Public (PVSD Channel) uses (City of Perris, 2016). Per the PVCCSP EIR, the PVCCSP area contains approximately 204 acres of active Williamson Act contracts that are

located within the Perris Valley Agricultural Preserve No. 1. The Project area is not located within the Perris Valley Agricultural Preserve No. 1, and is not subject a Williamson Act contract (City of Perris, 2004). Furthermore, the City of Perris General Plan EIR determined that the City's General Plan area resulted in no impacts related to a conflict with existing zoning for agricultural uses or a Williamson Act contract because all agricultural lands within the City's General Plan area have been re-designated for uses other than agriculture (City of Perris, 2004). Accordingly, the Project would not conflict with an existing Williamson Act contract or with existing agricultural zoning designations. No impact would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

The Project would have no impact. This is consistent with the conclusions of the PVCCSP EIR.

Threshold c Would the Project conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code Section 12220(9)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104 (g))?

Threshold d Would the Project result in loss of forest land or conversion of forest land non-forest use?

As previously discussed, according to the PVCCSP (Figure 2.0-1, Specific Plan Land Use Designations), there are no areas within the PVCCSP, including the Project area, designated for forest land (City of Perris, 2018). Further, the Project area does not contain forest land or any vegetation communities associated with forest land (GLA, 2020; GLA, 2019). Accordingly, the Project would not conflict with areas currently zoned as forest, timberland, or Timberland Production, and would not result in the rezoning of any such lands, nor would the Project result in the loss of forest land or the conversion of forest land to non-forest use. No impact would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

The Project would have no impact. The PVCCSP EIR did not address forest land.

Threshold e Would the Project 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?

As shown on Figure 4.2-1, Zone of Influence, there are no agricultural activities occurring in the area surrounding the Project area, and as shown on Figure 4.2-3, FMMP Farmlands Map, site adjacent areas designated Farmland (Farmland of Statewide Importance) include existing roadways or the MWD

easement that is not used for agricultural purposes. As disclosed previously in the analysis for Threshold a, based on the results of the LESA, which takes into consideration Farmland in the ZOI, the Project would have a less than significant impact related to the conversion of Farmland to non-agricultural uses (industrial uses and PVSD Channel improvements).

As disclosed above under the analysis for Thresholds c and d, the Project would not involve other changes in the existing environment that would result in conversion of forest land to non-forest land.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR for Farmland.

4.2.5 CUMULATIVE IMPACTS

As identified in the PVCCSP EIR, build out of the PVCCSP, which includes the Project, would result in the conversion of Prime Farmland and Farmland of Statewide Importance to non-agricultural uses. That conversion was previously addressed in the EIR that was prepared for the City of Perris' 1991 General Plan and in the Perris General Plan EIR and a Statement of Overriding Considerations was adopted for the loss of designated farmland related to the 1991 General Plan. The 2005 Perris General Plan EIR and the PVCCSP EIR relied on the previous Statement of Overriding Considerations to determine that no new impacts to agricultural resources, including cumulative impacts, would result.

Development in the County of Riverside and the City of Perris, including the PVCCSP area, would result in the cumulative conversion of agricultural uses and Farmland to a more urbanized, non-agricultural land use. This is a continuing development trend currently occurring in the region. Based on inventories of agricultural acreage prepared as part of the FMMP, the amount of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland in the County decreased by approximately 37 percent between 1984 and 2016. As of 2016, there were approximately 117,484 acres of Prime Farmland, 43,757 acres of Farmland of Statewide Importance, and 32,565 acres of Unique Farmland remaining in the County. With the continued introduction of non-agricultural land uses, there would continue to be a decrease in amount of Farmland in the County. There are various factors driving the decline in agriculture in the County, and ongoing conversion of Farmland to non-agricultural uses including, but not limited to increasing land values, environmental regulations, competition from the Central Valley, and high water and labor costs.

The limited nature of the existing agricultural activity in the City does not significantly contribute to the overall economic vitality of the City or the County. The City of Perris continues to undergo a transition into an urban area and conversion of agricultural lands has been identified as goals of both the current (2005) and past (1991) General Plans. Agricultural land use designations were not established in either plan, with the exception of one small parcel in the current General Plan. The continued utilization of property in the City, including the Project area, for continued low quality agricultural activity would impede the City from achieving the goals and objectives set forth in its General Plan. Therefore, build out of the

City's General Plan and the PVCC Specific Plan would result in the continued conversion of Farmland to non-agricultural uses. As determined in Thresholds a and e, above, Project impacts related to farmland conversion would be less than significant and therefore not cumulatively considerable.

The Project area does not have a Williamson Contract nor does the Project conflict with zoning of agricultural use. Accordingly, the Project would not have cumulative significant impact due to conflicting with a Williamson Contract or zoning of agricultural use. Additionally, there are no forest lands, timberlands, or Timberland Production zones within the Project area or in the Project area's vicinity, nor are any nearby lands under active production as forest land. Therefore, cumulatively significant impacts to forest land would not occur and the Project has no potential to result in a cumulatively considerable impact to the loss of these lands.

4.2.6 REFERENCES

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4.3 AIR QUALITY

In compliance with the requirements of the Perris Valley Commerce Center Specific Plan (PVCCSP) Environmental Impact Report (EIR), this section provides Project-specific analyses of the Project's potential to have adverse effects related to air quality during construction and operation based on a Project-specific Air Quality Impact Analysis ("AQIA"; Appendix B). An operational health risk assessment ("HRA"; Appendix B) also have been conducted to address emissions from diesel-powered trucks. Emissions calculations and model results can be found in Appendix B. All references used in this Section are listed in Section 4.3.7, References.

- Urban Crossroads, 2019. *Construction Health Risk Assessment Memorandum*. November 16, 2019. Included in Appendix B of this EIR.
- Urban Crossroads, 2020a. *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project – Air Quality Impact Analysis [AQIA]*. July 22, 2020. Included in Appendix B of this EIR.
- Urban Crossroads, 2020b. *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Mobile Source Health Risk Assessment*. July 22, 2020. Included in Appendix B of this EIR.
- Urban Crossroads, 2020c. *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Focused Mobile Source Health Risk Assessment (with I-215 Freeway/Placentia Avenue Interchange)*. July 22, 2020. Included in Appendix B of this EIR.

Comments relating to the issue of air quality were raised in response to the Notice of Preparation (NOP) for this EIR. Specifically, in its NOP comment letter, the California Air Resources Board (CARB) indicated a need to evaluate air pollution and health risks resulting from the Project, including cumulative health risks to sensitive receptors and construction-related health risks. The CARB further requested mechanisms to ensure that transportation refrigeration units (TRUs), which are not proposed as part of the Project, not be allowed in the future without subsequent environmental evaluation. The CARB also identified measures to reduce the exposure of toxic diesel emissions in disadvantaged communities, the emissions of oxides of nitrogen (NO_x), and greenhouse gas (GHG) emissions. The South Coast Air Quality Management District (SCAQMD) also commented on the Project's NOP, and provided recommendations for the scope of the Project's AQIA and health risk analyses for the Project. SCAQMD also recommended truck trip generation rates for evaluation, the inclusion of feasible mitigation measures to avoid or minimize the Project's significant air quality impacts, and an evaluation of alternatives to the Project that would result in reduced air quality emissions. SCAQMD also provided information on the availability of data sources to be used in the analysis.

At the November 6, 2019 Draft EIR public scoping meeting, the Planning Commissioners requested that the EIR address Project and cumulative air quality and health risk impacts to sensitive receptors (e.g., residents and schools) from operations, including emissions from trucks, and to identify mitigation measures for impacts. The Planning Commissioners also requested an analysis of impacts due to GHG emissions (which are addressed separately in Section 4.8 of this EIR), and an analysis of potential impacts to adjacent residential uses.

4.3.1 EXISTING SETTING

Section 4.2, Air Quality, of the PVCCSP EIR includes a detailed discussion of the environmental setting, which includes the following topics related to air quality: setting for the PVCCSP area, physical setting of the South Coast Air Basin (SoCAB), regional and local climate, precipitation and temperature, winds, stationary and mobile emission sources, air pollution constituents (criteria pollutants, toxic air contaminants, and diesel emissions), monitored air quality, and existing air quality emissions. The following discussion focuses on information that is either particularly relevant to the Project or information that is new or has been updated since the PVCCSP EIR was prepared.

The Project area is located within the SoCAB, which is under the jurisdiction of SCAQMD.

Air Pollution Constituents

Criteria Pollutants

Criteria pollutants are pollutants that are regulated through the development of human health based and/or environmentally based criteria for setting permissible levels. As described in Section 4.2 of the PVCCSP EIR, air pollutants are classified as either primary or secondary, depending on how they are formed. Primary pollutants are emitted directly from a source into the atmosphere. Examples of primary pollutants include carbon monoxide (CO), nitrogen dioxide (NO₂) and nitric oxide (NO) (which are collectively known as oxides of nitrogen [NO_x]), sulfur dioxide (SO₂), particulates 10 microns or less in diameter (PM₁₀), particulates 2.5 microns or less in diameter (PM_{2.5}), and volatile organic compounds (VOCs). The predominant source of air emissions generated by Project development would be from vehicle emissions. Motor vehicles primarily emit CO, NO_x, and VOCs.

Secondary pollutants are created over time and are formed in the atmosphere as chemical and photochemical reactions take place. An example of a secondary pollutant is ozone (O₃), which is one of the products formed when NO_x reacts with VOCs in the presence of sunlight. Other secondary pollutants include photochemical aerosols. Secondary pollutants such as O₃ represent major air quality problems in the SoCAB.

The Federal Clean Air Act of 1970 established the National Ambient Air Quality Standards (NAAQS). Seven "criteria" air pollutants have now been identified using specific medical evidence, and NAAQS have been established for those pollutants. The State of California has adopted standards (known as California Ambient Air Quality Standards [CAAQS]) for the same seven criteria pollutants, but the State has established different and generally more restrictive allowable levels. The criteria pollutants are CO, NO₂, O₃, lead, PM₁₀, PM_{2.5}, VOC and SO₂. Further discussion of the criteria pollutants, their sources, and their effects on human health can be found in Section 4.2, Air Quality, of the PVCCSP EIR and Section 2.4 of the AQIA included in Appendix B of this EIR.

The NAAQS and CAAQS establish the context for the local air quality management plans (AQMPs) and for determining the significance of a project's contribution to local or regional pollutant concentrations. NAAQS and CAAQS are presented in Table 4.3-1, *California and National Ambient Air Quality Standards*. The NAAQS and CAAQS represent the level of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. They are designed to protect those people most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other diseases or illness, and persons engaged in strenuous work or exercise.

Table 4.3-1 California and National Ambient Air Quality Standards

Ambient Air Quality Standards						
Pollutant	Averaging Time	California Standards ¹		National Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Ozone (O ₃) ⁸	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)		
Respirable Particulate Matter (PM ₁₀) ⁹	24 Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		—		
Fine Particulate Matter (PM _{2.5}) ⁹	24 Hour	—	—	35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	12.0 µg/m ³	15 µg/m ³	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m ³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m ³)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m ³)		9 ppm (10 mg/m ³)	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		—	—	
Nitrogen Dioxide (NO ₂) ¹⁰	1 Hour	0.18 ppm (339 µg/m ³)	Gas Phase Chemiluminescence	100 ppb (188 µg/m ³)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)		0.053 ppm (100 µg/m ³)	Same as Primary Standard	
Sulfur Dioxide (SO ₂) ¹¹	1 Hour	0.25 ppm (655 µg/m ³)	Ultraviolet Fluorescence	75 ppb (196 µg/m ³)	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m ³)	
	24 Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (for certain areas) ¹¹	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas) ¹¹	—	
Lead ^{12,13}	30 Day Average	1.5 µg/m ³	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m ³ (for certain areas) ¹²	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m ³		
Visibility Reducing Particles ¹⁴	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m ³	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence			
Vinyl Chloride ¹²	24 Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography			

See footnotes on next page ...

For more information please call ARB-PIO at (916) 322-2990
 Source: (Urban Crossroads, 2020a)

California Air Resources Board (5/4/16)

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above $150 \mu\text{g}/\text{m}^3$ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
9. On December 14, 2012, the national annual PM2.5 primary standard was lowered from $15 \mu\text{g}/\text{m}^3$ to $12.0 \mu\text{g}/\text{m}^3$. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at $35 \mu\text{g}/\text{m}^3$, as was the annual secondary standard of $15 \mu\text{g}/\text{m}^3$. The existing 24-hour PM10 standards (primary and secondary) of $150 \mu\text{g}/\text{m}^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
11. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard ($1.5 \mu\text{g}/\text{m}^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

For more information please call ARB-PIO at (916) 322-2990

California Air Resources Board (5/4/16)

Toxic Air Contaminants

Toxic air contaminants (TACs) are chemicals generally referred to as “non-criteria” air pollutants. They are known or suspected to cause serious health problems, but do not have a corresponding ambient air quality standard. There are hundreds of air toxics, and exposure to these pollutants can cause or contribute to cancer or non-cancer health effects such as birth defects, genetic damage, and other adverse health effects. Effects may be both chronic (i.e., of long duration) or acute (i.e., severe but of short duration) on human health. Acute health effects are attributable to sudden exposure to high concentrations of air toxics. These effects can include nausea, skin irritation, respiratory illness, and, in some cases, death. Chronic health effects usually result from low-dose, long-term exposure to air toxics. The effect of major concern for this type of exposure is cancer, which typically requires a latency period of 10 to 30 years after exposure to develop.

Diesel Emissions

Diesel engines utilize compression to ignite fuel, contrary to standard gasoline engines which use conventional spark plugs. Engines that use compression typically run at higher temperatures than gasoline engines, thereby causing the formation of substantially more NO_x than in gasoline engines. In 1998, the California Air Resources Board (CARB) designated diesel particulate matter (diesel PM), which is present in diesel engine exhaust, as a TAC.

Monitored Air Quality

The Project area is located within SCAQMD Source Receptor Area (SRA) 24, Perris Valley. O₃ and PM₁₀ are monitored at the Perris Valley monitoring station, approximately 2.8 miles south of the Project area. CO and NO₂ are not monitored within SRA 24, but are monitored at the SRA 25, Elsinore Valley, approximately 12 miles southwest of the Project area. The most recent published data for SRAs 24 and 25 are for 2016 through 2018 and are presented in Table 4.3-2, *Project Area Air Quality Monitoring Summary (2016-2018)*.

The monitoring data show that O₃ is the air pollutant of primary concern in the Project area. The State 1-hour O₃ standard was exceeded 23 days in 2016, 33 days in 2017, and 31 days in 2018. The State and federal 8-hour O₃ standards were exceeded 56 days in 2016, 80 days in 2017, and 67 days in 2018. As previously described, O₃ is a secondary pollutant.

Particulate matter (PM₁₀ and PM_{2.5}) is another air pollutant of concern in the area. The federal 24-hour PM₁₀ standard was not exceeded in 2016, 2017, or 2018, while the State 24-hour PM₁₀ standard was exceeded in all three of the sample years. The annual PM_{2.5} federal standard also was exceeded in all three of the sampled years. Particulate levels in the area are due to natural sources (such as wind), grading operations, and motor vehicles.

Regional air quality is defined in a regulatory sense by whether the area has or has not attained State and/or federal ambient air quality standards, as determined by monitoring data. Areas that are in nonattainment are required to prepare plans and implement measures that will bring the region into attainment. When an area has been reclassified from nonattainment to attainment for a federal standard, the status is identified as “maintenance,” and there must be a plan and measures established that will keep the region in attainment for the following ten years. Table 4.3-3, *Attainment Status of Criteria Pollutants in the SoCAB*, lists the current attainment designations for the SoCAB.

Table 4.3-2 Project Area Air Quality Monitoring Summary (2016-2018)

Pollutant	Standard	Year		
		2016	2017	2018
O₃				
Maximum Federal 1-Hour Concentration (ppm)		0.131	0.120	0.117
Maximum Federal 8-Hour Concentration (ppm)		0.098	0.105	0.103
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	23	33	31
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.070 ppm	56	80	67
CO				
Maximum Federal 1-Hour Concentration	> 35 ppm	1.2	1.2	1.1
Maximum Federal 8-Hour Concentration	> 20 ppm	0.6	0.8	0.8
NO₂				
Maximum Federal 1-Hour Concentration	> 0.100 ppm	0.051	0.049	0.041
Annual Federal Standard Design Value		0.008	0.008	0.009
PM₁₀				
Maximum Federal 24-Hour Concentration (µg/m ³)	> 150 µg/m ³	76	75	104
Annual Federal Arithmetic Mean (µg/m ³)		32.2	32.2	22.4
Number of Days Exceeding Federal 24-Hour Standard	> 150 µg/m ³	0	0	0
Number of Days Exceeding State 24-Hour Standard	> 50 µg/m ³	5	11	9
PM_{2.5}				
Maximum Federal 24-Hour Concentration (µg/m ³)	> 35 µg/m ³	39.12	50.3	50.7
Annual Federal Arithmetic Mean (µg/m ³)	> 12 µg/m ³	12.54	12.18	12.41
Number of Days Exceeding Federal 24-Hour Standard	> 35 µg/m ³	4	6	2

ppm= Parts Per Million

Data for O₃, CO, NO₂, PM₁₀, and PM_{2.5} was obtained from SCAQMD Air Quality Data Tables.

Source: (Urban Crossroads, 2020a)

Table 4.3-3 Attainment Status of Criteria Pollutants in the SoCAB

Criteria Pollutant	State Designation	Federal Designation
O ₃ – 1-hour standard	Nonattainment	--
O ₃ – 8-hour standard	Nonattainment	Nonattainment
PM ₁₀	Nonattainment	Attainment
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO ₂	Attainment	Unclassifiable/Attainment
SO ₂	Unclassifiable/Attainment	Unclassifiable/Attainment
Pb ¹	Attainment	Unclassifiable/Attainment

Note: See Appendix 2.1 of the Project’s AQIA (Appendix B) for a detailed map of State/National Area Designations within the SoCAB

“--” = The national 1-hour O₃ standard was revoked effective June 15, 2005

Source: (Urban Crossroads, 2020a)

¹ The Federal nonattainment designation for lead is only applicable towards the Los Angeles County portion of the SoCAB.

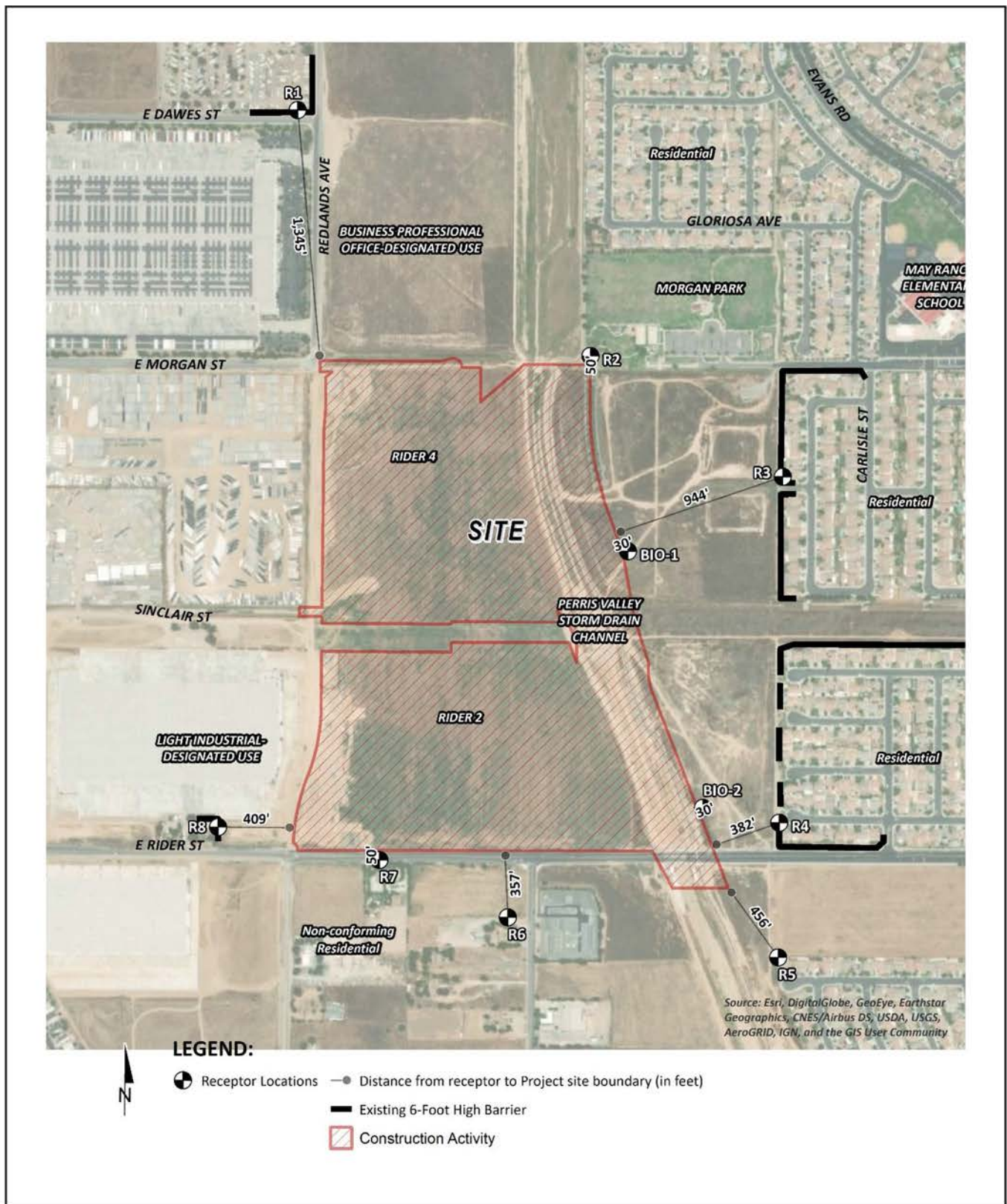
Sensitive Receptors

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as “sensitive receptors”. These structures typically include residences, hotels, hospitals, etc. as they are also known to be locations where an individual can remain for 24 hours. Receptors in the Project study area are shown on Figure 4.3-1, *Sensitive Receptor Locations*.

As shown, representative sensitive receptors in the Project study area include single-family residences, the Campers Resorts of America RV park, and Morgan Park, as described below. Other sensitive land uses in the Project study area that are located at greater distances than those identified in this air study will experience lower emission levels than those presented in this report due to the additional attenuation from distance and the shielding of intervening structures. Distance is measured in a straight line from the Project area boundary to each receptor location.

- R1: Location R1 represents the existing Camper Resorts of America RV park located approximately 1,345 feet north of the Project area.
- R2: Location R2 represents the existing park, Morgan Park, located approximately 48 feet east of the Project area (east of the PVSD Channel Improvement Project).
- R3: Location R3 represents the existing single-family residence at 3502 Churchill lane located approximately 944 feet east of the Project area (east of the PVSD Channel Improvement Project).
- R4: Location R4 represents the existing single-family residence at 805 Finnegan Way located approximately 382 feet east of the Project area (east of the PVSD Channel Improvement Project).
- R5: Location R5 represents existing single-family residence located at 812 Parula Street approximately 456 feet southeast of the Project area.
- R6: Location R6 represents existing non-conforming residences within light industrial-designated land use located approximately 357 feet south of the Project area.
- R7: Location R7 represents existing non-conforming residences within light industrial-designated land use located approximately 50 feet south of the Project area.
- R8: Location R8 represents existing non-conforming residences within light industrial-designated land use located approximately 409 feet west of the Project area.

It should be noted that receptor location R1 shown on Figure 4.3-1 is an RV park, a transient use within a commercial zone, and is identified as a receptor relevant to the Localized Significance Thresholds (LST) analysis. However, it is not the nearest receptor for the LST analysis. Receptor locations BIO-1 and BIO-2 represent existing open space uses and potential sensitive receptor locations with respect to biological resources. These receptors are not considered for purposes of the air quality analysis but are presented for consistency with other technical reports.



Source(s): Urban Crossroads (07-03-2020)

Figure 4.3-1



Sensitive Receptor Locations

4.3.2 EXISTING POLICIES AND REGULATIONS

Section 4.2 of the PVCCSP EIR and AQIA included in Appendix B of this EIR provides a complete discussion of the regulatory framework for the analysis of air quality impacts. Regulatory information for air quality that is particularly relevant to the Project is presented below. Additional information regarding the regulatory background for air quality is presented in the AQIA.

Federal

U.S. Environmental Protection Agency

The U.S. Environmental Protection Agency (USEPA) regulates emissions sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. The USEPA's air quality mandates are drawn primarily from the Clean Air Act (CAA), which was first enacted in 1955 and subsequently amended; the most recent major amendments made by Congress were in 1990. The CAA established NAAQS and specifies future dates for achieving compliance. The CAA also mandates that states submit and implement a State Implementation Plan (SIP) for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met.

The 1990 amendments to the CAA that identify specific emission reduction goals for areas not meeting the NAAQS require a demonstration of reasonable further progress toward attainment and incorporate additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants O_3 , NO_2 , SO_2 , PM_{10} , CO , $PM_{2.5}$, and Pb . The NAAQS were amended in July 1997 to include an additional standard for O_3 and to adopt a NAAQS for $PM_{2.5}$. The NAAQS within the SoCAB are shown in Table 4.3-1, California and National Ambient Air Quality Standards.

Mobile source emissions are regulated in accordance with Title II provisions. These provisions require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas. Automobile manufacturers are also required to reduce tailpipe emissions of hydrocarbons and NO_x . NO_x is a collective term that includes all forms of NO_x which are emitted as byproducts of the combustion process.

State

California Environmental Protection Agency

The mission of the California Environmental Protection Agency (CalEPA) is restore, protect and enhance the environment, to ensure public health, environmental quality and economic vitality. This is accomplished by developing, implementing and enforcing environmental laws that regulate air, water and soil quality, pesticide use and waste recycling and reduction. Relevant to air quality, the CalEPA consists of the California Air Resources Board (CARB) and the Office Environmental Health Hazard Assessment (OEHHA).

In 2012, the Legislature passed Senate Bill (SB) 535, which targets disadvantaged communities in California for investment of proceeds from the State's cap-and-trade program to improve public health, quality of life, and economic opportunity in California's most burdened communities, while also reducing pollution. SB 535 directed that 25 percent of the proceeds from the Greenhouse Gas Reduction Fund go to projects that provide a benefit to disadvantaged communities. The legislation gave CalEPA responsibility for identifying those communities. In 2016, the Legislature passed Assembly Bill (AB) 1550, which now requires that 25 percent of proceeds from the fund be spent on projects located in disadvantaged communities. CalEPA has prepared a list of disadvantaged communities for the purpose of SB 535 and CalEviroscreen is a general mapping tool developed by OEHHA to help identify California communities that are most affected by sources of pollution.

California Air Resources Board

The CARB is responsible for ensuring implementation of the California Clean Air Act (CCAA) (AB 2595), responding to the federal CAA, and for regulating emissions from consumer products and motor vehicles. AB 2595 mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the state ambient air quality standards by the earliest practical date. The CARB established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, establishes standards for SO₄, visibility, hydrogen sulfide (H₂S), and vinyl chloride (C₂H₃Cl). However, at this time, H₂S and C₂H₃Cl are not measured at any monitoring stations in the SoCAB because they are not considered to be a regional air quality problem. Generally, the CAAQS are more stringent than the NAAQS (as shown in Table 4.3-1, below).

Local air quality management districts, such as the SCAQMD, regulate air emissions from stationary sources such as commercial and industrial facilities. All air pollution control districts have been formally designated as attainment or non-attainment for each CAAQS. Serious non-attainment areas are required to prepare AQMPs that include specified emission reduction strategies in an effort to meet clean air goals. The AQMPs are required to include the following and are then integrated into the State SIP.

- Application of Best Available Retrofit Control Technology to existing sources;
- Developing control programs for area sources (e.g., architectural coatings and solvents) and indirect sources (e.g. motor vehicle use generated by residential and commercial development);
- A District permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions;
- Implementing reasonably available transportation control measures and assuring a substantial reduction in growth rate of vehicle trips and miles traveled;
- Significant use of low emissions vehicles by fleet operators;
- Sufficient control strategies to achieve a 5% or more annual reduction in emissions or 15% or more in a period of three years for ROG, NOX, CO and PM₁₀. However, air basins may use alternative emission reduction strategy that achieves a reduction of less than 5% per year under certain circumstances.

Toxic Air Contaminants

In 1984, as a result of public concern for exposure to airborne carcinogens, CARB adopted regulations to reduce the amount of toxic air contaminant (TAC) emissions resulting from mobile and area sources, such as cars, trucks, stationary products, and consumer products. The TACs responsible for most of the known cancer risk associated with airborne exposure in California include TACs derived from mobile sources (diesel particulate matter [DPM], benzene [C₆H₆], and 1,3-butadiene [C₄H₆]); those that are derived from stationary sources (perchloroethylene [C₂Cl₄] and hexavalent chromium [Cr(VI)]); and, those derived from photochemical reactions of emitted VOCs (formaldehyde [CH₂O] and acetaldehyde [C₂H₄O]). The decline in ambient concentration and emission trends of these TACs are a result of various regulations CARB has implemented to address cancer risk, as further discussed in Section 2.9.1 of the AQIA included in Appendix B of this EIR.

CARB and the Ports of Los Angeles and Long Beach (POLA and POLB) have adopted several iterations of regulations for diesel trucks that are aimed at reducing DPM. More specifically, CARB Drayage Truck Regulation, CARB statewide On-road Truck and Bus Regulation, and the Ports of Los Angeles and Long Beach Clean Truck Program (CTP) require accelerated implementation of “clean trucks” into the statewide truck fleet. In other words, older more polluting trucks will be replaced with newer, cleaner trucks as a function of these regulatory requirements. Moreover, the average statewide DPM emissions for Heavy Duty Trucks (HDT), in terms of grams of DPM generated per mile traveled, will dramatically be reduced due to the aforementioned regulatory requirements.

Community Air Protection Program

In response to AB 617 (2017), CARB established the Community Air Protection Program (CAPP). The CAPP’s focus is to reduce exposure in communities most impacted by air pollution. This statewide effort includes community air monitoring and community emissions reduction programs. In addition, the Legislature appropriated funding to support early actions to address localized air pollution through targeted incentive funding to deploy cleaner technologies in these communities, as well as grants to support community participation in the AB 617 process. AB 617 also includes new requirements for accelerated retrofit of pollution controls on industrial sources, increased penalty fees, and greater transparency and availability of air quality and emissions data, which will help advance air pollution control efforts throughout the State. This new effort provides an opportunity to continue to enhance our air quality planning efforts and better integrate community, regional, and State level programs to provide clean air for all Californians.

Diesel Particulate Matter Regulations

In 1990, the State of California listed diesel exhaust as a known carcinogen under its Safe Drinking Water and Toxic Enforcement Act (Proposition 65). In 1998, CARB listed diesel particulate matter (DPM) as a TAC. Due to interstate commerce issues, regulating diesel emissions becomes not only a State-level issue, but largely a federal issue. The SCAQMD is not responsible for direct regulation of mobile sources, including diesel trucks, except for publicly-owned fleets with 15 or more vehicles. The SCAQMD becomes involved in diesel PM issues because they are the permitting agency for stationary sources (e.g., diesel generators) and they are the agency responsible for implementing the AQMP for the SoCAB. Specifically, in the case of light industrial land uses, the SCAQMD does not have direct regulatory control over the diesel truck emissions from vehicles traveling to and from these locations, but they do have the

responsibility for implementing and managing air quality plans for the SoCAB in which these facilities will be operating.

Off-road diesel vehicles are also regulated under CARB for both in-use (existing) and new engines. Off-road diesel vehicles include construction equipment. On November 30, 2018, CARB adopted a Final Regulation Order, titled, "Airborne Toxic Control Measures for Diesel Particulate Matter from Portable Engines Rated at 50 Horsepower and Greater." The Final Regulation Order specifies four sets of standards for the diesel emissions of newly manufactured engines, known as tiers, and establishes deadlines for retiring lower-tier, and thus higher polluting, vehicles. The Final Regulation Order prohibited most Tier 1 engines from operating in the State as of January 1, 2020, and ultimately requires all engines with a rating greater than 50 brake horsepower (bhp) and that do not meet Tier 4 standards to cease operation in the State by January 1, 2029. (CARB, 2018)

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2011, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that became effective on January 1, 2020. Local jurisdictions are permitted to adopt more stringent requirements, as state law provides methods for local enhancements.

The 2019 Title 24 standards will result in less energy use, thereby reducing air pollutant emissions associated with energy consumption in the SoCAB and across the State of California. The California Energy Commission (CEC) anticipates that single-family homes built with the 2019 standards will use approximately 7 percent less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar photovoltaic systems, homes built under the 2019 standards will use about 53 percent less energy than homes built under the 2016 standards. Nonresidential buildings (such as the Project) will use approximately 30% less energy due to lighting upgrade requirements.

Because the Project will be constructed after January 1, 2020, the 2019 CALGreen standards are applicable to the Project and require, among other items:

- **Short-term bicycle parking.** If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- **Long-term bicycle parking.** For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).

- **Designated parking for clean air vehicles.** In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- **Electric vehicle (EV) charging stations.** New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3).
- **Outdoor light pollution reduction.** Outdoor lighting systems shall be designed to meet the backlight, upright and glare ratings per Table 5.106.8 (5.106.8)
- **Construction waste management.** Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- **Excavated soil and land clearing debris.** 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- **Recycling by Occupants.** Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- **Water conserving plumbing fixtures and fittings.** Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - *Water Closets.* The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
 - *Urinals.* The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
 - *Showerheads.* Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
 - *Faucets and fountains.* Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).

- **Outdoor portable water use in landscaped areas.** Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- **Water meters.** Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (5.303.1.1 and 5.303.1.2).
- **Outdoor water use in rehabilitated landscape projects equal or greater than 2,500 sf.** Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).
- **Commissioning.** For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

Regional

South Coast Air Quality Management District

The Project is in Riverside County, in the SoCAB, where the SCAQMD is the agency principally responsible for comprehensive air pollution control. As a regional agency, the SCAQMD works directly with the Southern California Association of Governments (SCAG), County transportation commissions, and local governments, and cooperates actively with all federal and State government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emissions sources, and enforces such measures through educational programs or fines when necessary. SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a sequence of AQMPs. As further discussed below, an AQMP establishes a program of rules and regulations directed at attaining the NAAQS and CAAQS.

SCAQMD rule development through the 1970s and 1980s resulted in dramatic improvement in SoCAB air quality. Nearly all control programs developed through the early 1990s relied on (i) the development and application of cleaner technology; (ii) add-on emission controls, and (iii) uniform CEQA review throughout the SoCAB. Industrial emission sources have been significantly reduced by this approach and vehicular emissions have been reduced by technologies implemented at the state level by CARB. SCAQMD created AQMPs which represent a regional blueprint for achieving healthful air on behalf of the 16 million residents of the SoCAB. As a result of SCAQMD's efforts, emissions and emission levels of O₃, NO_x, VOC, CO, PM₁₀, PM_{2.5} have been decreasing in the SoCAB since 1975 and are projected to continue to decrease. These decreases result primarily from motor vehicle controls and reductions in evaporative emissions. Refer to Subsection 2.9 of the Project's AQIA (Appendix B of this EIR) for a complete description of regional air quality improvement.

Air Quality Management Plan

The AQMP control measures and related emission reduction estimates are based on emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, conformance with the AQMP for development projects is determined by demonstrating compliance with local land use plans and/or population projections. On November 8, 2019, CARB released a SIP Update, which includes a joint CARB/SCAQMD strategy to achieve the remaining NO_x emissions reductions needed to achieve the ozone standard in 2023. This revision is identified as the “2019 South Coast 8-Hour Ozone SIP Update.” On December 12, 2019, the CARB Board approved a resolution to submit the 2019 South Coast 8-Hour Ozone SIP Update to the EPA (CARB, 2020).

On March 3, 2017, the SCAQMD adopted the 2016 AQMP, which is a regional and multi-agency effort (SCAQMD, CARB, SCAG, and EPA). The 2016 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as, explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. Similar to the 2012 AQMP, the 2016 AQMP incorporates the latest scientific and technical information and planning assumptions including SCAG’s 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories. The AQMP’s control measures and related emission reduction estimates are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments.

In June 2016, SCAG received its conformity determination from the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) indicating that all air quality conformity requirements for the 2016 RTP/SCS have been met.

SCAQMD Rules

The Project would be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. They include applying water or chemical stabilizers to disturbed soils, managing haul road dust by applying water, covering all haul vehicles before transporting materials, restricting vehicle speeds on unpaved roads to 15 miles per hour (mph), and sweeping loose dirt from paved site access roadways used by construction vehicles. In addition, it is required to establish vegetative ground cover on disturbance areas that are inactive within 30 days after active operations have ceased. Alternatively, an application of dust suppressants can be applied in sufficient quantity and frequency to maintain a stable surface. Rule 403 also requires grading and excavation activities to cease when winds exceed 25 mph.

SCAQMD Rule 1113 governs the sale of architectural coatings and limits the VOC content in paints and paint solvents. Although this rule does not directly apply to the project, it does dictate the VOC content of paints available for use during building construction and under long-term operating conditions.

City of Perris General Plan

The Conservation Element and Healthy Community Element of the City of Perris General Plan include goals and policies related to air quality. The specific policies of the General Plan related to air quality that are relevant to the proposed project are identified in Table 4.11-2, in Section 4.11, Land Use and Planning, of this EIR, along with an analysis of the Project's consistency with these policies.

4.3.3 METHODS

Models Employed to Analyze Air Quality

California Emissions Estimator Model™ (CalEEMod)

On October 17, 2017, the SCAQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the CalEEMod Version 2016.3.2. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}) and Greenhouse Gas (GHG) emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for the Project to determine construction and operational air quality emissions. Output from the model runs for construction activities are provided in Appendices 3.1 through 3.4 of the AQIA included in Appendix B of this EIR, and output for the model runs for operational activities are provided in Appendix 3.7 of the AQIA.

Emissions Factors Model (EMFAC)

On August 19, 2019, the Environmental Protection Agency (EPA) approved the 2017 version of the EMISSIONS FACTOR model (EMFAC) web database for use in SIP and transportation conformity analyses. EMFAC2017 is a mathematical model that was developed to calculate emission rates, fuel consumption, Vehicle Miles Travelled (VMT) from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the CARB to project changes in future emissions from on-road mobile sources. The Project's AQIA utilizes summer, winter, and annual EMFAC2017 emission factors in order to derive vehicle emissions associated with Project operational activities, which vary by season. Because the EMFAC2017 emission rates are associated with vehicle fuel types while CalEEMod vehicle emission factors are aggregated to include all fuel types for each individual vehicle class, the EMFAC2017 emission rates for different fuel types of a vehicle class are averaged by activity or by population and activity to derive CalEEMod emission factors. The equations applied to obtain CalEEMod vehicle emission factors for each emission type are detailed in CalEEMod User's Guide Appendix A: Calculation Details for CalEEMod.

Construction Modeling Assumptions

Construction activities associated with the Project would result in emissions of VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}. Construction related emissions are expected from the following construction activities:

- PVSD Channel Improvements
 - PVSD Channel Excavation
 - PVSD Channel Construction
 - Detouring Traffic/Street Closure

- Grubbing/Land Clearing
 - Grading/Excavation/Removing Existing Bridge
 - Bridge Construction
 - Drainage/Utilities/Sub-Grade
 - Paving
- Rider 2 and Rider 4 Warehouse Construction
 - Site Preparation
 - Grading
 - Building Construction
 - Paving
 - Architectural Coating

Dust is typically a major concern during grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called “fugitive emissions.” Fugitive dust emission rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. Construction of the Project would involve excavation of the Rider 2 and Rider 4 sites, and would require approximately 180,000 cubic yards of soil import. The soil would be imported from PVSD to the adjacent vacant land area for Rider 2 and Rider 4 sites using scrapers, which eliminates the need for dump trucks to haul the soil.

Construction emissions for construction worker vehicles traveling to and from the Project area, as well as vendor trips (construction materials delivered to the Project area) were estimated based on information from CalEEMod defaults. The construction schedule utilized in the analysis, is shown in Table 3-2 and Table 3-3, of this EIR, and represent a “worst-case” analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent². The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines. Based on the estimated construction schedule, construction activities for the Rider 2 and Rider 4 buildings would overlap with the construction activities for the PVSD Channel improvements, including the Rider Street bridge. It should be noted that the overlapping construction activity may affect the maximum peak daily construction emissions levels for criteria pollutants.

Site specific construction fleet may vary due to specific project needs at the time of construction. The associated construction equipment was based on CalEEMod defaults and Project-specific information provided by the Project Applicant. A detailed summary of construction equipment assumptions by phase is provided in Table 3-5 and Table 3-6 of this EIR.

²

Operational Modeling Assumptions

As described in Section 3.0, Project Description, of this EIR, the PVSD Channel Improvement area is approximately 29.7 acres, and the Project Applicant proposes improvements to the PVSD Channel from an area approximately 100 feet north of Morgan Street to an area approximately 120 feet south of Rider Street. The AQIA analyzed a proposed development of up to 1,373,449 square feet of High-Cube Transload Short-Term Storage Warehouse (without cold storage) use³ associated with the Rider 2 and Rider 4 buildings. CalEEMod land uses that most closely fit the described Project are reflected in these analyses.

The PVSD Channel Improvements would not generate quantifiable emissions from Project operations. Additionally, the PVSD Channel Improvements do not involve the construction of buildings and therefore would not result in a permanent source of area stationary source emissions. While it is anticipated that the PVSD Channel would require intermittent maintenance, such maintenance would be minimal requiring a negligible amount of traffic trips on an annual basis, and would be similar to existing maintenance activities associated with the existing channel. Therefore, air quality effects associated with long-term operation of the PVSD Channel are not included in the analysis.

Localized Significance Thresholds (LST) Analysis Methodology

Localized Significance Thresholds (LSTs) represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. For evaluating Project-related LST impacts, the analysis in the Project's AQIA makes use of methodology included in the SCAQMD Final Localized Significance Threshold Methodology (LST Methodology). Refer to Subsection 3.6 of the Project's AQIA (Appendix B) for a description of the methodology used to evaluate the Project's localized air quality impacts.

Diesel Particulate Matter (DPM) Health Risk Assessment Methodology

Vehicle Diesel Particulate Matter (DPM) emissions were calculated using emission factors for particulate matter less than 10µm in diameter (PM₁₀) generated with the 2017 version of EMFAC, as described previously. Several distinct emission processes are included in EMFAC 2017. Emission factors calculated using EMFAC 2017 are expressed in units of grams per vehicle miles traveled (g/VMT) or grams per idle-hour (g/idle-hr), depending on the emission process. Refer to Subsection 2.2 of the Project's HRA (Appendix B) for a detailed description of the methodologies used to estimate the Project's DPM emissions.

³ The Project as evaluated in this EIR includes a total of 1,352,736 sf of building area; however, for purposes of analysis within the Project's AQIA, a total of 1,373,449 sf of building area was evaluated. The larger building was proposed when preparation of the AQIA was initiated, and would also account for any minor changes that may occur to the building area as part of final design.

4.3.4 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard;
- Expose sensitive receptors to substantial pollutant concentrations; and
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The SCAQMD has established significance thresholds to assess the regional and localized impacts of Project-related air pollutant emissions. These significance thresholds are updated as needed to appropriately represent the most current technical information and attainment status in the SoCAB. Table 4.3-4, *Maximum Daily Regional Emissions Thresholds*, provides a summary of the SCAQMD Regional Emissions Thresholds for both construction and operational activities. The SCAQMD’s CEQA Air Quality Significance Thresholds (April 2019) indicate that any projects in the SoCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

Table 4.3-4 Maximum Daily Regional Emissions Thresholds

Pollutant	Construction Regional Thresholds	Operational Regional Thresholds
NO _x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
SO _x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Pb	3 lbs/day	3 lbs/day

lbs/day = pounds per day
 Source: (Urban Crossroads, 2020a)

As described in the Project’s AQIA, the SCAQMD’s screening look-up tables are utilized in determining the significance of the Project’s localized air quality impacts, and to determine if further detailed analysis is required. This approach is conservative as it assumes that all on-site emissions associated with the Project would occur within a concentrated 5-acre area. Consistent with SCAQMD guidance, the thresholds presented in Table 4.3-5, *Construction Localized Emissions Thresholds*, were calculated by interpolating the threshold values for the Project’s disturbed acreage. The threshold values presented in Table 4.3-6 *Maximum Daily Operational Localized Emissions Thresholds*, are from the look-up tables at 5 acres with a 38-meter receptor distance.

Table 4.3-5 Construction Localized Emissions Thresholds

Pollutant	Construction Localized Thresholds
PVSD Channel Improvements – PVSD Channel Excavation	
NO _x	396 lbs/day (Excavation/Grading)
CO	3,985 lbs/day (Excavation/Grading)
PM ₁₀	65 lbs/day (Excavation/Grading)
PM _{2.5}	18 lbs/day (Excavation/Grading)
PVSD Channel Improvements – Channel Construction	
NO _x	232 lbs/day (Grubbing/Land Clearing)
	232 lbs/day (Grading/Excavation/Removing Existing Bridge) One- and Two-Stage Bridge Construction
	320 lbs/day (Drainage/Utilities/Sub-Grade)
PVSD Channel Improvements – Channel Construction	
CO	2,164 lbs/day (Grubbing/Land Clearing)
	2,164 lbs/day (Grading/Excavation/Removing Existing Bridge) One- and Two-Stage Bridge Construction
	3,126 lbs/day (Drainage/Utilities/Sub-Grade)
PM ₁₀	36 lbs/day (Grubbing/Land Clearing)
	36 lbs/day (Grading/Excavation/Removing Existing Bridge) One- and Two-Stage Bridge Construction
	51 lbs/day (Drainage/Utilities/Sub-Grade)
PM _{2.5}	10 lbs/day (Grubbing/Land Clearing)
	10 lbs/day (Grading/Excavation/Removing Existing Bridge) One- and Two-Stage Bridge Construction
	14 lbs/day (Drainage/Utilities/Sub-Grade)
Rider 2 and 4 Warehouse Construction	
NO _x	220 lbs/day (Site Preparation)
	237 lbs/day (Grading)
CO	1,230 lbs/day (Site Preparation)
	1,346 lbs/day (Grading)
PM ₁₀	10 lbs/day (Site Preparation)
	11 lbs/day (Grading)
PM _{2.5}	6 lbs/day (Site Preparation)
	7 lbs/day (Grading)

Source: Localized Thresholds presented are based on the SCAQMD LST Methodology, July 2008. (Urban Crossroads, 2020a)

Table 4.3-6 Maximum Daily Operational Localized Emissions Thresholds

Pollutant	Operational Localized Thresholds
NO _x	270 lbs/day
CO	1,577 lbs/day
PM ₁₀	4 lbs/day
PM _{2.5}	2 lbs/day

Source: Localized Thresholds presented are based on the SCAQMD LST Methodology, July 2008. (Urban Crossroads, 2020a)

With respect to “cumulative considerable” increases in emissions, the AQMD has published a report on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. In this report the AQMD clearly states (Page D-3):

“...the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or Environmental Impact Report (EIR). The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for TAC emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.”

Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD’s recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the SoCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable.

With respect to carcinogenic chemical risk, The SCAQMD CEQA Air Quality Handbook (1993) states that emissions of toxic air contaminants (TACs) are considered significant if an HRA shows an increased cancer risk of greater than 10 in one million. Based on guidance from the SCAQMD in the document, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, for purposes of this analysis, 10 in one million is used as the cancer risk threshold for evaluating the Project’s potential TAC impacts associated with cancer risk.

The SCAQMD also has established non-carcinogenic risk parameters for use in HRAs. Non-carcinogenic risks are quantified by calculating a "hazard index," expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). An REL is a concentration at or below which health effects are not likely to occur. A hazard index less of than one (1.0) means that adverse

health effects are not expected. Within this analysis, non-carcinogenic exposures of less than 1.0 are considered less-than-significant.

4.3.5 ENVIRONMENTAL IMPACTS

Applicable PVCC Standards and Guidelines and Mitigation Measures

There are no PVCCSP Standards and Guidelines specifically relevant to this air quality analysis. The PVCCSP EIR includes MMs that are relevant to air quality. These MMs must be implemented, are incorporated as part of the Project and are assumed in the analysis presented in this Section.

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

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

- *requiring the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain),*
- *keeping disturbed/loose soil moist at all times,*

- *requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered,*
- *installation of wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip,*
- *posting and enforcement of traffic speed limits of 15 miles per hour or less on all unpaved portions of the project site,*
- *suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 miles per hour,*
- *appointment of a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,*
- *sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks when sweeping streets to remove visible soil materials,*
- *replacement of ground cover in disturbed areas as quickly as possible.*

MM Air 4 *Building and grading permits shall include a restriction that limits idling of construction equipment on site to no more than 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 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.*
- 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 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 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 1 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 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 [Transport Refrigeration Units] 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.*

MM Air 19 *In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g., electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the project site. These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris' Building Division) prior to conveyance of applicable streets.*

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

Impact Analysis

Threshold a: Would the project conflict with or obstruct implementation of the applicable air quality plan?

The PVCCSP EIR concludes that implementation of the PVCCSP and its subsequent implementing development and infrastructure projects would not conflict with or obstruct the implementation of the AQMP.

Subsequent to certification of the PVCCSP EIR in 2012, in March 2017 the SCAQMD released the Final 2016 AQMP. The 2016 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, State, and local levels. Similar to the 2012 AQMP, the 2016 AQMP incorporates scientific and technological information and planning assumptions, including the 2016 Regional Transportation/Sustainable Communities Strategy (RTP/SCS) and updated emission inventory methodologies for various source categories. The Project's consistency with the AQMP has been determined using the 2016 AQMP.

The AQMP's control measures and related emission reduction estimates are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, if a project demonstrates compliance with local land use plans and/or population projections, then the AQMP would have taken into account such uses when it was developed.

The City of Perris General Plan land use and Zoning designation for the Project area is “PVCCSP”. The PVCCSP land use designation for the Rider 2 and Rider 4 sites is Light Industrial, and the PVSD Channel is designated for the Future Perris Valley Storm Drain. The LI land use designation allows for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials and retail related to manufacturing. The Project is proposed to consist of two High-Cube Transload Short-Term Storage Warehouse buildings (without cold storage) that comply with the development standards outlined in the PVCCSP. The Project also includes implementation of planned PVSD Channel improvements as anticipated by the PVCCSP. The Project’s proposed uses are consistent with the applicable General Plan land use designations. Therefore, this land use development and associated air quality emissions would have been accounted for in the SCAQMD’s 2016 AQMP.

Population and employment estimates for the City are compiled by the SCAG in the RTP/SCS. The Project would increase employment opportunities within the City. The employment projections in the RTP/SCS are based on information gathered from cities within SCAG’s jurisdiction. Thus, because the Project is consistent with the land use designation applied to the site by the PVCCSP and the Perris General Plan, employment estimates associated with implementation of the Project would have also been accounted for in the RTP/SCS. Therefore, because the Project is compliant with local land use plans and population projections, the Project would not conflict with or obstruct implementation of the AQMP. As such, because the Project would not result in a conflict with the SCAQMD 2016 AQMP, no impact would occur. (Urban Crossroads, 2020a)

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

No impact would occur. This finding is consistent with the finding in the PVCCSP EIR.

Threshold b: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?

The PVCCSP EIR concludes that, even with mitigation, emissions from both the construction and operation of allowed uses within the PVCCSP would be significant and unavoidable. Specifically, construction-related emissions of NO_x, reactive organic compounds (ROG, i.e., VOCs), and PM₁₀, and operational emissions of ROG (VOC), NO_x, CO, PM₁₀, and PM_{2.5} were determined to exceed the SCAQMD thresholds of significance.

The PVCCSP EIR mitigation measures MM Air 1, MM Air 10, and MM Air 15 require that project-specific air quality analyses be conducted to determine the potential impact of individual development projects in the PVCCSP area. These analyses have been conducted for the Project, as discussed in this subsection.

Regional Construction Impacts

Based on the methodologies presented above in Section 4.3.3, the Project’s construction emissions were calculated using CalEEMod. The details of construction phases, selection of construction equipment, areas to be paved, and other input parameters, including CalEEMod data, are included in the AQIA in

Appendix B of this EIR, and detailed construction model outputs are presented in Appendices 3.1 and 3.2 to the AQIA.

Construction emission without implementation of PVCCSP EIR mitigation measures are presented in Tables 3-9 and 3-10 of the AQIA. However, all development implementing the PVCCSP, including the Project, would be required to implement the applicable construction-related mitigation measures from the PVCCSP EIR, listed above. The estimated maximum daily construction emissions, after implementation of applicable PVCCSP EIR mitigation measures, are shown on Table 4.3-7 and Table 4.3-8 for the construction scenarios with construction of the Rider Street bridge in one-stage and two-stages, respectively. As previously shown in Table 4.3-3, the CAAQS designate the Project area as nonattainment for O₃, PM₁₀, and PM_{2.5}, while the NAAQS designates the Project area as nonattainment for O₃ and PM_{2.5}.

As shown in Table 4.3-7 and Table 4.3-8, after implementation of applicable PVCCSP EIR mitigation measures, emissions resulting from the Project construction would still exceed thresholds established by the SCAQMD for emissions of NO_x, which is a precursor to O₃. The NO_x exceedance is primarily due to the overlap in construction activities with the majority of emissions occurring during the Rider 2 and 4 Warehouse Construction – Building Construction phase (due to vendor trips accessing the Project area). Since neither the Project Applicant nor the City have regulatory authority to control tailpipe emissions, no additional feasible mitigation measures exist that would reduce NO_x emissions to levels that are less than significant, thus NO_x emissions during construction are considered significant and unavoidable. Therefore, the Project would result in a significant and unavoidable cumulatively considerable net increase of a criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.

Table 4.3-7 Construction Emissions Summary – With PVCCSP EIR Mitigation Measures (One-Stage Bridge Construction)

Phase	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer						
2020	1.97	36.10	41.20	0.08	9.78	5.12
2021	39.32	132.30	145.38	0.48	28.31	11.46
Winter						
2020	1.96	36.10	41.04	0.08	9.78	5.12
2021	39.30	132.18	141.97	0.47	28.31	9.67
Maximum Daily Emissions	39.32	132.30	145.38	0.48	28.31	11.46
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	YES	NO	NO	NO	NO

Note: Construction-source (unmitigated) emissions are presented in Appendices 3.5 through 3.6 and Appendix 3.8 of the AQIA in Appendix B of this EIR.

Source: (Urban Crossroads, 2020a)

Table 4.3-8 Construction Emissions Summary – With PVCCSP EIR Mitigation Measures (Two-Stage Bridge Construction)

Phase	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summer						
2020	1.97	36.10	41.20	0.08	9.81	5.15
2021	47.24	159.17	178.64	0.60	35.12	11.85
Winter						
2020	1.96	36.10	41.04	0.08	9.81	5.15
2021	47.22	149.54	167.70	0.51	28.99	10.34
Maximum Daily Emissions	47.24	159.17	178.64	0.60	35.12	11.85
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	YES	NO	NO	NO	NO

Note: Construction-source (unmitigated) emissions are presented in Appendices 3.5 through 3.6 and Appendix 3.8 of the AQIA in Appendix B of this EIR.

Source: (Urban Crossroads, 2020a)

Long-Term Regional Operational Impacts

For purposes of analysis, it is assumed that the Project would be operational by the end of December 2021, consistent with the traffic data presented in the Traffic Impact Analysis prepared for the Project. There are four general sources of long-term operational emissions: area sources, energy sources, mobile sources (i.e., vehicles), and on-site cargo handling equipment. The primary source of operational emissions generated by the Project would be from mobile sources, specifically, the trucks that would travel to and from the Project area and operate within the Project area. Trip generation data for the Project are shown on Table 4.13-9, Trip Generation Summary, in Section 4.13, Transportation, of this EIR. As shown in Table 4.13-9, the Project is expected to generate 1,926 two-way vehicular trips per day (963 inbound and 963 outbound). The Project trip generation includes 1,304 two-way passenger car trips per day (652 inbound and 652 outbound) and 622 two-way truck trips per day (311 inbound and 311 outbound) from the proposed buildings.

PVSD Channel Improvements primarily involve construction activity. For on-going operations, vehicular trips would be generated by motor vehicles traveling to and from the PVSD Channel and Rider Street bridge during periodic maintenance. As such, these Project components would not generate quantifiable emissions from Project operations. Additionally, these Project components do not involve any buildings and therefore no permanent source or area stationary source emissions. While it is anticipated that the PVSD Channel and Rider Street bridge would require intermittent maintenance, such maintenance already occurs with the existing PVSD Channel and Rider Street bridge, and would involve a negligible amount of traffic trips on an annual basis. Therefore, there is no significant operational emissions in regard to PVSD Channel improvements, including the Rider Street bridge.

Operational emissions are calculated based on land use types, the number of units or building sizes a project is proposing, vehicle trip characteristics, and project design features and/or mitigation measures to be implemented. The results are expressed in pounds per day and are compared with operational mass daily significance thresholds to determine impact significance. Emissions were calculated using CalEEMod, described previously. The results of the modeling calculations are presented in Appendix B of this EIR. For vehicle emissions, traffic data was obtained from the Traffic Impact Analysis prepared by Urban Crossroads (see Appendix L of this EIR). One model run was utilized in order to more accurately model emissions resulting from passenger car and truck operations and incorporates a trip length of

30.58 miles and an assumption of 100 percent primary trips. The trip length was determined by weighting the default trip length of 16.6 miles for passenger cars and the average truck trip length of 60 miles.

Project operation would be required to comply with previously-identified mitigation measures from the PVCCSP EIR. Specifically, the Project would comply with mitigation measure MM Air 20, which sets performance standards on energy and water usage. Project operation is also assumed to comply with the following measures, which would aid in the reduction of criteria pollutant emissions: mitigation measure MM Air 11 (which limits idling time of trucks), mitigation measure MM Air 12 (which requires electrical hookups for TRUs), mitigation measure MM Air 13 (which promotes the use of “clean” truck fleets), and mitigation measure MM Air 14 (which requires parking to accommodate ride-sharing vehicles). Although the Project would implement the PVCCSP EIR mitigation measures, it should be noted that there is no way to definitively quantify these reductions in CalEEMod. As such, as a conservative measure, no reductions are shown, leading to an overstatement of impacts.

Operational-source emissions are summarized on Table 4.3-9, *Summary of Peak Operational Emissions*. As indicated, the Project would exceed regional thresholds of significance established by the SCAQMD for emissions of NO_x. Over 95 percent of operational-source NO_x emissions would be generated from the mobile activities. As previously stated, the Project is required to comply with the applicable PVCCSP EIR mitigation measures identified above. Additional Project-level mitigation measures also have been identified and are included below (refer to mitigation measures MM 3-1 through MM 3-14). It should be noted that no additional feasible mitigation measures, beyond the measures identified herein, exist that would further reduce these emissions to levels that are less than significant. Neither the Project Applicant nor the Lead Agency (City of Perris) can substantively or materially affect reductions in Project mobile-source emissions beyond the regulatory requirements and mitigation measures identified herein. Thus, these emissions are considered significant and unavoidable, consistent with the conclusions of the PVCCSP EIR.

Table 4.3-9 Summary of Peak Operational Emissions

Operational Activities – Summer Scenario	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source	31.34	2.94E-03	0.32	2.00E-05	1.15E-03	1.15E-03
Energy Source	0.06	0.05	0.44	3.17E-03	0.04	0.04
Mobile Source	8.30	146.47	117.04	0.75	49.60	15.11
On-Site Equipment Source	0.68	7.73	3.87	0.02	0.26	0.24
Total Maximum Daily Emissions	40.38	154.26	121.68	0.77	49.90	15.39
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	YES	NO	NO	NO	NO
Operational Activities – Winter Scenario	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source	31.34	2.94E-03	0.32	2.00E-05	1.15E-03	1.15E-03
Energy Source	0.06	0.05	0.44	3.17E-03	0.04	0.04
Mobile Source	7.99	151.77	100.37	0.73	49.58	15.11
On-Site Equipment Source	0.68	7.73	3.87	0.02	0.26	0.24
Total Maximum Daily Emissions	40.07	159.55	105.00	0.75	49.89	15.39
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	YES	NO	NO	NO	NO

Note: Operational-source emissions are presented in Appendices 3.7 to the Project’s AQIA, included as Appendix B.

Source: (Urban Crossroads, 2020a)

Therefore, the Project would result in a significant and unavoidable cumulatively considerable net increase of a criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.

Health Consequences

In December 2018, in the case of *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, the California Supreme Court held that an EIR's air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. As noted in the Brief of Amicus Curiae by the SCAQMD in the Friant Ranch case (Brief), SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes.

The SCAQMD discusses that it may be infeasible to quantify health risks caused by projects similar to the Project, due to many factors. It is necessary to have data regarding the sources and types of air toxic contaminants, location of emission points, velocity of emissions, the meteorology and topography of the area, and the location of receptors (worker and residence). The Brief states that it may not be feasible to perform a health risk assessment for airborne toxics that will be emitted by a generic industrial building that was built on "speculation" (i.e., without knowing the future tenant(s)). Even where a health risk assessment can be prepared, however, the resulting maximum health risk value is only a calculation of risk – it does not necessarily mean anyone will contract cancer as a result of the Project. The Brief also cites the author of the CARB methodology, which reported that a PM_{2.5} methodology is not suited for small projects and may yield unreliable results. Similarly, SCAQMD staff does not currently know of a way to accurately quantify O₃-related health impacts caused by NO_x or VOC emissions from relatively small projects, due to photochemistry and regional model limitations. The Brief concludes, with respect to the Friant Ranch EIR, that although it may have been technically possible to plug the data into a methodology, the results would not have been reliable or meaningful.

On the other hand, for extremely large regional projects (unlike the Project), the SCAQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 lbs/day of NO_x and 89,180 lbs/day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to O₃.

The Project does not generate anywhere near 6,620 lbs/day of NO_x or 89,190 lbs/day of VOC emissions. The Project would generate between 132.30 lbs/day and 159.17 lbs/day of NO_x during construction (depending on the bridge construction scenario), and 59.55 lbs/day of NO_x during operations (2.00%, 2.40%, and 2.41% of 6,620 lbs/day, respectively). The Project would also generate between 39.32 and 47.24 lbs/day lbs/day of VOC emissions during construction (depending on the bridge construction scenario), and 40.38 lbs/day of VOC emissions during operations (0.04%, 0.05%, and 0.05% of 89,190 lbs/day, respectively). Therefore, the Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level.

Notwithstanding, the Project's AQIA (Appendix B) does evaluate the Project's localized impact to air quality for emissions of CO, NO_x, PM₁₀, and PM_{2.5} by comparing the Proposed Project's on-site emissions to the SCAQMD's applicable LST thresholds. As evaluated below under the analysis of Threshold c, the Project would not result in emissions that exceeded the SCAQMD's LSTs. Therefore, the Project would not be expected to exceed the most stringent applicable federal or State ambient air quality standards

for emissions of CO, NO_x, PM₁₀, and PM_{2.5}. Lastly, as also discussed under Threshold c, the Project's HRA determined that the Project would not result in any significant health risk impacts from exposure to toxic air contaminants (TACs) resulting from the Project. (Urban Crossroads, 2020a)

Additional Project-Level Mitigation Measures

The following additional mitigation measures are required to reduce Project operational-source NO_x emissions.

- MM 3-1** Prior to issuance of occupancy permits for the proposed buildings, the Project Applicant shall provide evidence to the City of Perris Building Division that legible, durable, weather-proof signs have been placed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations. At a minimum, each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than five (5) minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and 3) telephone numbers of the building facilities manager and the CARB to report violations.
- MM 3-2** Prior to issuance of occupancy permits, the Project Applicant or successor in interest shall provide documentation to the City demonstrating that occupants/tenants of the proposed buildings have been or will be provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.
- MM 3-3** Prior to the issuance of each building permit, the Project Applicant and its contractors shall provide plans and specifications to the City of Perris Building Division that demonstrate that each building is designed for passive heating and cooling, and is designed to include natural light. Features designed to achieve this shall include the proper placement of windows, overhangs, and skylights.
- MM 3-4** Prior to the issuance of each building permit, the Project Applicant and its contractors shall provide plans and specifications to the City of Perris Building Division that demonstrate that electrical service is provided to each of the areas in the vicinity of the buildings that are to be landscaped in order that electrical equipment may be used for landscape maintenance.
- MM 3-5** The Project Applicant shall include in all future lease agreements for the proposed buildings a requirement that all building tenants must utilize electric equipment for landscape maintenance to the extent feasible.
- MM 3-6** The Project Applicant shall include in all future lease agreements for the proposed buildings a requirement that all building tenants shall utilize only electric or natural gas service yard trucks (hostlers), pallet jacks and forklifts, and other onsite equipment. Electric-powered service yard trucks (hostlers), pallet jacks and forklifts, and other onsite equipment shall also be required instead of diesel-powered equipment, if technically feasible. Yard trucks may be diesel fueled in lieu of electrically or natural gas fueled provided such yard trucks are at least compliant with California Air Resources Board (CARB) 2010 standards for on-road vehicles or CARB Tier 4 compliant for off-road vehicles.

MM 3-7 Upon occupancy, the facility operator shall require tenants that do not already operate 2010 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, SmartWay Finance, or other similar funds. If awarded, the tenant shall be required to accept and use the funding. Tenants shall be encouraged to consider the use of alternative fueled trucks as well as new or retrofitted diesel trucks. Tenants shall also be encouraged to become SmartWay Partners, if eligible. This measure shall not apply to trucks that are not owned or operated by the facility operator or facility tenants since it would be infeasible to prohibit access to the site by any truck that is otherwise legal to operate on California roads and highways. The facility operator shall provide an annual report to the City of Perris Development Services Department. The report shall: one, list each engine design; two, describe the effort made by each tenant to obtain funding to upgrade their fleet and the results of that effort; and three, describe the change in each fleet composition from the prior year.

MM 3-8 Tenants who employ 250 or more employees on a full- or part-time basis shall comply with SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Options. The purpose of this rule is to provide employees with a menu of options to reduce employee commute vehicle emissions. Tenants with less than 250 employees or tenants with 250 or more employees who are exempt from SCAQMD Rule 2202 (as stated in the Rule) shall either (a) join with a tenant who is implementing a program in accordance with Rule 2202 or (b) implement an emission reduction program similar to Rule 2202 with annual reporting of actions and results to the City. The tenant-implemented program would include, but not be limited to the following:

- Appoint a Transportation Demand Management (TDM) coordinator who would promote the TDM program, activities and features to all employees.
- Create and maintain a “commuter club” to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work.
- Inform employees of public transit and commuting services available to them (e.g., social media, signage).
- Provide on-site transit pass sales and discounted transit passes.
- Guarantee a ride home.
- Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted.
- Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.”

MM 3-9 Prior to the issuance of a building permit, the Project Applicant shall provide evidence to the City of Perris Building Division that loading docks are designed to be compatible with SmartWay trucks.

MM 3-10 Upon occupancy and annually thereafter, the facility operator shall provide information to all tenants, with instructions that the information shall be provided to employees and truck drivers as appropriate, regarding:

- Building energy efficiency, solid waste reduction, recycling, and water conservation.
- Vehicle GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting.
- Participation in the Voluntary Interindustry Commerce Solutions (VICS) “Empty Miles” program to improve goods trucking efficiencies.
- Health effects of diesel particulates, State regulations limiting truck idling time, and the benefits of minimized idling.
- The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity.

MM 3-11 Prior to issuance of a building permit, the Project Applicant shall provide the City of Perris Building Division with an onsite signage program that clearly identifies the required onsite circulation system. This shall be accomplished through posted signs and painting on driveways and internal roadways.

MM 3-12 Prior to issuance of occupancy permits, the City of Perris Building Division shall confirm that signs clearly identifying approved truck routes have been installed along the truck routes to and from the Project area.

MM 3-13 Prior to issuance of an occupancy permit, the Project Applicant shall install a sign on the property with telephone, email, and regular mail contact information for a designated representative of the tenant who would receive complaints about excessive noise, dust, fumes, or odors. The sign shall also identify contact data for the City for perceived Municipal Code violations. The tenant’s representative shall keep records of any complaints received and actions taken to communicate with the complainant and resolve the complaint. The tenant’s representative shall endeavor to resolve complaints within 24 hours.

MM 3-14 Prior to issuance of a building permit, the Project Applicant shall provide the City of Perris Building Division with project specifications, drawings, and calculations that demonstrate that main electrical supply lines and panels have been sized to support heavy truck charging facilities when these trucks become available. The calculations shall be based on reasonable predictions from currently available truck manufacturer’s data. Electrical system upgrades that exceed reasonable costs shall not be required.

Level of Significance After Mitigation

As indicated in the preceding analysis, after implementation of applicable mitigation measures from the PVCCSP EIR, emissions resulting from the Project construction would exceed the regional thresholds established by the SCAQMD for NOx emissions. The exceedance of the NOx threshold is primarily associated with the overlap in construction activities and associated vendor trips. Additionally, even with

implementation of the PVCCSP EIR operational mitigation measures and additional Project-specific mitigation measures MM 3-1 through MM 3-14, operational NO_x emissions would also exceed the regional significance thresholds. The operational emissions are primarily associated with vehicle emissions. The City of Perris and the Project Applicant do not have regulatory authority to control tailpipe emissions and no additional feasible mitigation measures beyond the measures identified herein exist that would reduce NO_x emissions to levels below the regional thresholds established by the SCAQMD.

Therefore, construction and operation of the Project would contribute to existing violations of the O₃ standard (NO_x is an O₃ precursor). Therefore, the Project would result in a significant and unavoidable cumulatively considerable net increase of a criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard. This conclusion is consistent with the conclusions of the PVCCSP EIR.

Threshold c: Would the project expose sensitive receptors to substantial pollutant concentrations?

The PVCCSP EIR concludes that implementation of the PVCCSP and its subsequent implementing development and infrastructure projects would not expose sensitive receptors to substantial pollutant concentrations during project construction. Implementation of mitigation measures would prevent the exposure of sensitive receptors to substantial pollutant concentrations related to long-term air quality impacts associated with build out of the PVCCSP. However, the PVCCSP EIR acknowledges that individual projects would need to complete the appropriate analysis to address localized impacts from construction and operation (SCAQMD LST analysis).

Localized Impacts from Criteria Pollutants

As previously stated, LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable NAAQS and CAAQS at the nearest residence or sensitive receptor. Receptor locations are off-site locations where individuals may be exposed to emissions from Project activities. Consistent with the SCAQMD LST Methodology, the nearest land use where an individual could remain for 24 hours to the Project area (in this case the nearest residential land use) has been used to determine construction and operational air quality impacts for emissions of PM₁₀ and PM_{2.5}, since PM₁₀ and PM_{2.5} thresholds are based on a 24 hour averaging time. The nearest receptor used for evaluation of localized impacts of PM₁₀ and PM_{2.5} during PVSD Channel improvements and Rider 2 and 4 warehouse construction activities is represented by location R4 and R7, respectively. As identified previously, location R4 is described as an existing single-family residence at 805 Finnegan Way located approximately 382 feet/116 meters east of the Project area. Location R7 represents existing non-conforming residences within light industrial-designated land use located approximately 51 feet/16 meters south of the Project area.

As per the *LST Methodology*, commercial and industrial facilities are not included in the definition of sensitive receptor because employees and patrons do not typically remain onsite for a full 24 hours but are typically onsite for eight hours or less. The *LST Methodology* explicitly states that “LSTs based on shorter averaging periods, such as the NO₂ and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours.” For purposes of analysis, if an industrial/commercial use is located at a closer distance to the Project sites than the nearest residential use, the nearest industrial/commercial use will be utilized to determine construction and operational LST air impacts for emissions of NO₂ and CO an individual could be present at these sites for periods of one to eight hours.

As there are no industrial/commercial uses located at a closer distance compared to the residential uses (R4 and R7), the same 116-meter and 16-meter distances will be used for evaluation of localized NO_x and CO impacts during PVSD Channel improvements and Rider 2 and 4 warehouse construction activities, respectively.

The LST Methodology also explicitly states that “*It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.*” As such a 25-meter receptor distance will be used for evaluation of localized PM₁₀, PM_{2.5}, NO_x, and CO during Rider 2 and 4 warehouse construction activities.

Localized Significance Thresholds – Construction

Based on the methodologies presented in Subsection 3.6 of the Project’s AQIA (Appendix B), the localized significance of the Project’s construction-related emissions has been evaluated. The LST analysis for construction is dependent, in part, on the number of acres that would be disturbed during each phase of construction. The disturbed area per day is representative of a piece of equipment making multiple passes over the same land area. The maximum daily disturbed acreage for the proposed construction activities are shown in Tables 3-15 and 3-16 of the AQIA.

The SCAQMD’s screening look-up tables were utilized to determine if the Project has the potential to result in a significant localized air quality impact. It should be noted that since the look-up tables identify thresholds at only 1 acre, 2 acres, and 5 acres, linear regression has been utilized to determine localized significance thresholds. Consistent with SCAQMD guidance, the thresholds previously presented in Table 4.3-5 were calculated by interpolating the threshold values for the Project’s disturbed acreage.

Tables 3-20 and Table 3-21 of the AQIA identify the localized impacts at the nearest receptor location in the vicinity of the Project without implementation of the PVCCSP EIR mitigation measures, which are incorporated into the Project. As shown, Project localized construction-source emissions would not exceed the numerical thresholds of significance established by the SCAQMD for any criteria pollutant during PVSD Channel improvements (PVSD Channel excavation and Channel construction). However, Project localized construction-source emissions would exceed the thresholds of significance for emissions of PM₁₀ and PM_{2.5} during Rider 2 and 4 warehouse construction site preparation activities.

However, the Project is required to comply with the applicable PVCCSP EIR mitigation measures (notably mitigation measures MM Air 3, MM Air 6, and MM Air 9). The estimated maximum daily construction emissions, with implementation of applicable PVCC SP EIR MMs, are shown on Table 4.3-10 and Table 4.3-11. After implementation of applicable PVCCSP EIR mitigation measures (specifically PVCCSP EIR Mitigation Measures MM Air 3, MM Air 6, and MM Air 9), localized emissions resulting from the Project construction would not exceed localized thresholds of significant for emissions of any criteria pollutant. Thus, a less than significant impact would occur for Project-related localized construction-source emissions and no additional mitigation is required beyond compliance with the PVCCSP EIR mitigation measures. (Urban Crossroads, 2020a)

Localized Significance Thresholds – Long-Term Operations

As previously discussed, the SCAQMD’s *LST Methodology* provides look-up tables for sites with an area with daily disturbance of 5 acres or less. For projects that exceed 5 acres, the 5-acre LST look-up tables can be used as a screening tool to determine which pollutants require additional detailed analysis. This

approach is conservative as it assumes that all on-site emissions associated with the Project would occur within a concentrated 5-acre area. This screening method would therefore over-predict potential localized impacts, because by assuming that on-site operational activities are occurring over a smaller area, the resulting concentrations of air pollutants are more highly concentrated once they reach the smaller site boundary than they would be for activities if they were spread out over a larger surface area. On a larger site, the same amount of air pollutants generated would disperse over a larger surface area and would result in a lower concentration once emissions reach the project-site boundary. As such, LSTs for a 5-acre site during operations are used as a screening tool to determine if further detailed analysis is required.

Table 4.3-12, *Localized Operations Emissions Summary*, shows the calculated emissions for the Project’s operational activities compared with the applicable LSTs. The LST analysis includes on-site sources only; however, CalEEMod outputs do not separate on- and off-site emissions from mobile sources. In an effort to establish a maximum potential impact scenario for analytic purposes, the emissions shown on Table 4.3-12 represent on-site Project-related stationary (area) sources and 5 percent of the Project-related mobile sources. Considering that the trip length used in CalEEMod for the Project is approximately 30.58 miles, 5 percent of this total would represent an on-site travel distance of approximately 1.53 mile/8,073.12 feet. It should be noted that the longest on-site distance from the entry to the exit is 0.9 miles through the Rider 2 site and 0.7 miles through the Rider 4 site. As such, the 5 percent assumption is conservative and would tend to overstate the actual impact because it is not likely that a vehicle would drive more than 0.9 mile on the site.

Modeling based on these assumptions demonstrates that even within broad encompassing parameters, Project operational-source emissions would not exceed applicable LST thresholds for the nearest sensitive receptor (refer to Table 4.3-12). Therefore, the Project would have a less than significant localized impact during long-term operational activities (Urban Crossroads, 2020a).

Table 4.3-10 Localized Construction Emissions Summary – With PVCCSP EIR Mitigation Measures (One-Stage Bridge Construction)

PVSD Channel Improvements – Channel Excavation	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Excavation/Grading				
Maximum Daily Emissions	36.04	40.39	3.65	1.62
SCAQMD Localized Threshold	396	3,985	65	18
Threshold Exceeded?	NO	NO	NO	NO
PVSD Channel Improvements – Channel Construction	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Grubbing/Land Clearing				
Maximum Daily Emissions	18.69	22.11	1.15	0.78
SCAQMD Localized Threshold	232	2,164	36	10
Threshold Exceeded?	NO	NO	NO	NO
PVSD Channel Improvements – Channel Construction	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Grading/Excavation/Removing Existing Bridge				
Maximum Daily Emissions	27.83	34.92	1.55	1.18
SCAQMD Localized Threshold	232	2,164	36	10

Threshold Exceeded?	NO	NO	NO	NO
Drainage/Utilities/Sub-Grade				
Maximum Daily Emissions	21.88	24.52	2.07	0.96
SCAQMD Localized Threshold	320	3,126	51	14
Threshold Exceeded?	NO	NO	NO	NO
Rider 2 and 4 Warehouse Construction	Emissions (lbs/day)			
	NO_x	CO	PM₁₀	PM_{2.5}
Site Preparation				
Maximum Daily Emissions	27.05	30.31	9.52	5.06
SCAQMD Localized Threshold	220	1,230	10	6
Threshold Exceeded?	NO	NO	NO	NO
Grading				
Maximum Daily Emissions	37.16	38.70	5.43	2.88
SCAQMD Localized Threshold	237	1,346	11	7
Threshold Exceeded?	NO	NO	NO	NO

Source: (Urban Crossroads, 2020a)

Table 4.3-11 Localized Construction Emissions Summary – With PVCCSP EIR Mitigation Measures (Two -Stage Bridge Construction)

PVSD Channel Improvements – Channel Excavation	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Excavation/Grading				
Maximum Daily Emissions	36.04	40.39	3.65	1.62
SCAQMD Localized Threshold	396	3,985	65	18
Threshold Exceeded?	NO	NO	NO	NO
PVSD Channel Improvements – Channel Construction	Emissions (lbs/day)			
	NO_x	CO	PM₁₀	PM_{2.5}
Grubbing/Land Clearing				
Maximum Daily Emissions	12.44	15.10	0.91	0.54
SCAQMD Localized Threshold	232	2,164	36	10
Threshold Exceeded?	NO	NO	NO	NO
Stage 1: Grading/Excavation/Removing Existing Bridge				
Maximum Daily Emissions	24.10	30.74	1.41	1.04
SCAQMD Localized Threshold	232	2,164	36	10
Threshold Exceeded?	NO	NO	NO	NO
Stage 2: Grading/Excavation/Removing Existing Bridge				
Maximum Daily Emissions	24.10	30.74	1.41	1.04
SCAQMD Localized Threshold	232	2,164	36	10
Threshold Exceeded?	NO	NO	NO	NO
Drainage/Utilities/Sub-Grade				
Maximum Daily Emissions	21.88	24.52	1.66	0.92
SCAQMD Localized Threshold	320	3,126	51	14
Threshold Exceeded?	NO	NO	NO	NO
Rider 2 and 4 Warehouse Construction	Emissions (lbs/day)			
	NO_x	CO	PM₁₀	PM_{2.5}
Site Preparation				

Maximum Daily Emissions	27.05	30.31	9.52	5.06
SCAQMD Localized Threshold	220	1,230	10	6
Threshold Exceeded?	NO	NO	NO	NO
Grading				
Maximum Daily Emissions	37.16	38.70	5.43	2.88
SCAQMD Localized Threshold	237	1,346	11	7
Threshold Exceeded?	NO	NO	NO	NO

Source: (Urban Crossroads, 2020a)

Table 4.3-12 Localized Operations Emissions Summary

Rider 2 and 4 Warehouse Operations	Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	15.37	10.49	2.78	1.04
SCAQMD Localized Threshold	270	1,577	4	2
Threshold Exceeded?	NO	NO	NO	NO

Source: Localized operational-source emissions are presented in Appendix 3.7 to the Project's AQIA (Appendix B).
 (Urban Crossroads, 2020a)

Construction Health Risk Assessment

As outlined in the *Construction Health Risk Assessment Memorandum* prepared by Urban Crossroads (November 2019) (Urban Crossroads, 2019), and included in Appendix B of this EIR, the Office of Environmental Health Hazard Assessment (OEHHA) Guidance Manual states, "Due to the uncertainty in assessing cancer risk from very short-term exposures, we do not recommend assessing cancer risk for projects lasting less than two months at the [Maximally Exposed Individual Receptor (MEIR)]. We recommend that exposure from projects longer than 2 months but less than 6 months be assumed to last 6 months (e.g., a 2-month project would be evaluated as if it lasted 6 months)."

As such, the determination of whether a construction Health Risk Assessment (HRA) is warranted is dependent on whether or not early life exposure adjustments apply to DPM emissions resulting from construction activity. The analysis provided herein outlines the substantial evidence to support why early life exposure adjustments are not applicable to construction DPM and therefore a construction health risk assessment is not required due to the short-term duration of construction activity (long-term exposure, e.g. 9 or 30 years of activity, are typically used to generate risk estimates).

For risk assessments conducted under the auspices of The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588), OEHHA applies specific adjustment factors to all carcinogens regardless of purported mechanism of action. Notwithstanding, applicability of AB 2588 is limited to commercial and industrial operations. There are two broad classes of facilities subject to the AB 2588 Program: 1) Core facilities and 2) facilities identified within discrete industry-wide source categories. Core facilities subject to AB 2588 compliance are sources whose criteria pollutant emissions (particulate matter, oxides of sulfur, oxides of nitrogen and volatile organic compounds) are 25 tons per year or more as well as those facilities whose criteria pollutant emissions are 10 tons per year or more but less than 25 tons per year. Industry-wide source facilities are classified as smaller operations with relatively similar emission profiles (e.g., auto body shops, gas stations and dry cleaners using perchloroethylene). The

emissions generated from off-road mobile sources are not classified in AB 2588 as core operations nor subject to industry-wide source evaluation.

In comments presented to the SCAQMD Governing Board (Meeting Date: June 5, 2015, Agenda No. 28) relating to toxic air contaminant exposures under Rules 1401, 1401.1, 1402 and 212 revisions, use of the OEHHA Guidelines specifically related to the applicability and use of early-life exposure adjustments for projects subject to CEQA, it was reported that:

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

To date, the SCAQMD, as a commenting agency, has not conducted public workshops nor developed policy relating to the application of early-life exposure adjustments utilizing the OEHHA Guidance Manual for projects prepared by other public/lead agencies subject to CEQA.

As a result, it is recommended that health risk assessments rely upon U.S. EPA documentation when evaluating the use of early life exposure adjustment factors (Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-003F), wherein adjustment factors are only considered when carcinogens act “through the mutagenic mode of action.” A mutagen is a physical or chemical agent that changes genetic material, such as DNA, increasing the frequency of mutations to produce carcinogenic effects. The use of adjustment factors is recommended to account for the susceptibility of producing adverse health effects during early life stages from exposure to these mutagenic compounds.

In 2006, U.S. EPA published a memorandum which provides guidance regarding the preparation of health risk assessments should carcinogenic compounds elicit a mutagenic mode of action. As presented in the technical memorandum, numerous compounds were identified as having a mutagenic mode of action. For diesel particulates, polycyclic aromatic hydrocarbons (PAHs) and their derivatives, which are known to exhibit a mutagenic mode of action, comprise < 1% of the exhaust particulate mass. To date, the U.S. Environmental Protection Agency reports that whole diesel engine exhaust has not been shown to elicit a mutagenic mode of action.

Additionally, the California Department of Toxic Substances Control (DTSC) which is charged with protecting individuals and the environment from the effects of toxic substances and responsible for assessing, investigating and evaluating sensitive receptor populations to ensure that properties are free of contamination or that health protective remediation levels are achieved has adopted the U.S. EPA’s policy in the application of early-life exposure adjustments which is consistent with the methodology considered herein. As such, incorporation of early-life exposure adjustments for exposures to DPM emissions in the quantification of carcinogenic risk for construction of the proposed are not considered.

Given that there is no available guidance that has been adopted by SCAQMD for CEQA purposes and the fact that the Project does not emit any pollutants that elicit a primary mutagenic mode of action, the use of the OEHHA Guidelines to determine potential construction health risks would not be appropriate

and therefore has not been conducted. On this basis, Project-related DPM emissions during construction would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

Operational Health Risk Assessment

In order to evaluate the potential significance of the Project's mobile-source DPM emissions, and as required by PVCCSP EIR mitigation measure MM Air 15, the *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Mobile Source Health Risk Assessment*, City of Perris (HRA) has been prepared by Urban Crossroads (July 2020) (Urban Crossroads, 2020b), and is included in Appendix B of this EIR. The Project's operational HRA is based on SCAQMD guidelines to produce conservative estimates of human health risk posed by exposure to DPM. Vehicle DPM emissions were calculated using emission factors for particulate matter less than 10µm in diameter (PM₁₀) generated with the 2017 version of the EMFAC developed by the CARB.

Several distinct emission processes are included in EMFAC 2017. Emission factors calculated using EMFAC 2017 are expressed in units of grams per vehicle miles traveled (g/VMT) or grams per idle-hour (g/idle-hr), depending on the emission process. For the Project, annual average PM₁₀ emission factors were generated by running EMFAC 2017 in EMFAC Mode for vehicles in the SCAQMD jurisdiction. The EMFAC Mode generates emission factors in terms of grams of pollutant emitted per vehicle activity and can calculate a matrix of emission factors at specific values of temperature, relative humidity, and vehicle speed.

The model was run for speeds traveled in the vicinity of the Project. Calculated emission factors are shown in Table 2-1 of the Project's operational HRA. As a conservative measure, a 2021 EMFAC 2017 run was conducted and a static 2021 emissions factor data set was used for the entire duration of analysis herein (e.g., 30 years). Use of 2021 emission factors would overstate potential impacts since this approach assumes that emission factors remain "static" and do not change over time due to fleet turnover or cleaner technology with lower emissions that would be incorporated into vehicles after 2021. The vehicle DPM exhaust emissions were calculated for running exhaust emissions. The running exhaust emissions were calculated by applying the running exhaust PM₁₀ emission factor (g/VMT) from EMFAC over the total distance traveled.

Similar to off-site traffic, on-site vehicle running emissions were calculated by applying the running exhaust PM₁₀ emission factor (g/VMT) from EMFAC and the total vehicle trip number over the length of the driving path using the same formula presented above for on-site emissions. In addition, on-site vehicle idling exhaust emissions were calculated by applying the idle exhaust PM₁₀ emission factor (g/idle-hr) from EMFAC and the total truck trip over the total assumed idle time (15 minutes).

Each roadway was modeled as a line source (made up of multiple adjacent volume sources). The DPM emission rate for each volume source was calculated by multiplying the emission factor (based on the average travel speed along the roadway) by the number of trips and the distance traveled along each roadway segment and dividing the result by the number of volume sources along that roadway, as illustrated on Table 4.3-13, *DPM Emissions from Project Trucks (2021 Analysis Year)*. The modeled truck route is consistent with the trip distribution patterns identified in the Project's traffic study (assuming use of the Harley Knox Boulevard interchange with I-215), is based on use of the City's designated truck

Table 4.3-13 DPM Emissions from Project Trucks (2021 Analysis Year)

Truck Emission Rates						
Source	Trucks Per Day	VMT ^a (miles/day)	Truck Emission Rate ^b (grams/mile)	Truck Emission Rate ^b (grams/idle-hour)	Daily Truck Emissions ^c (grams/day)	Modeled Emission Rates (g/second)
On-Site Idling Rider 4 (West Side)	62			0.1213	1.88	2.180E-05
On-Site Idling Rider 4 (East Side)	62			0.1213	1.88	2.180E-05
On-Site Idling Rider 2 (West Side)	93			0.1213	2.83	3.270E-05
On-Site Idling Rider 2 (East Side)	93			0.1213	2.83	3.270E-05
On-Site Travel Rider 4	248	172.36	0.0985		16.97	1.964E-04
On-Site Travel Rider 2	373	292.02	0.0985		28.76	3.328E-04
Off-Site Travel 100% Inbound/Outbound	621	2476.18	0.0403		99.75	1.154E-03
Off-Site Travel 30% Inbound/Outbound Rider 2	186	56.82	0.0403		2.29	2.649E-05
Off-Site Travel 30% Inbound/Outbound Rider 2	186	56.85	0.0403		2.29	2.651E-05
Off-Site Travel 20% Outbound Rider 4	62	11.39	0.0403		0.46	5.313E-06
Off-Site Travel 15% Inbound/Outbound Rider 4	93	21.74	0.0403		0.88	1.014E-05
Off-Site Travel 25% Inbound Rider 4	78	10.16	0.0403		0.41	4.738E-06
Off-Site Travel 5% Outbound Rider 4	16	2.03	0.0403		0.08	9.477E-07

^a Vehicle miles traveled are for modeled truck route only.

^b Emission rates determined using EMFAC 2017. Idle emission rates are expressed in grams per idle hour rather than grams per mile.

^c This column includes the total truck travel and truck idle emissions. For idle emissions this column includes emissions based on the assumption that each truck idles for 15 minutes.

(Urban Crossroads, 2020b)

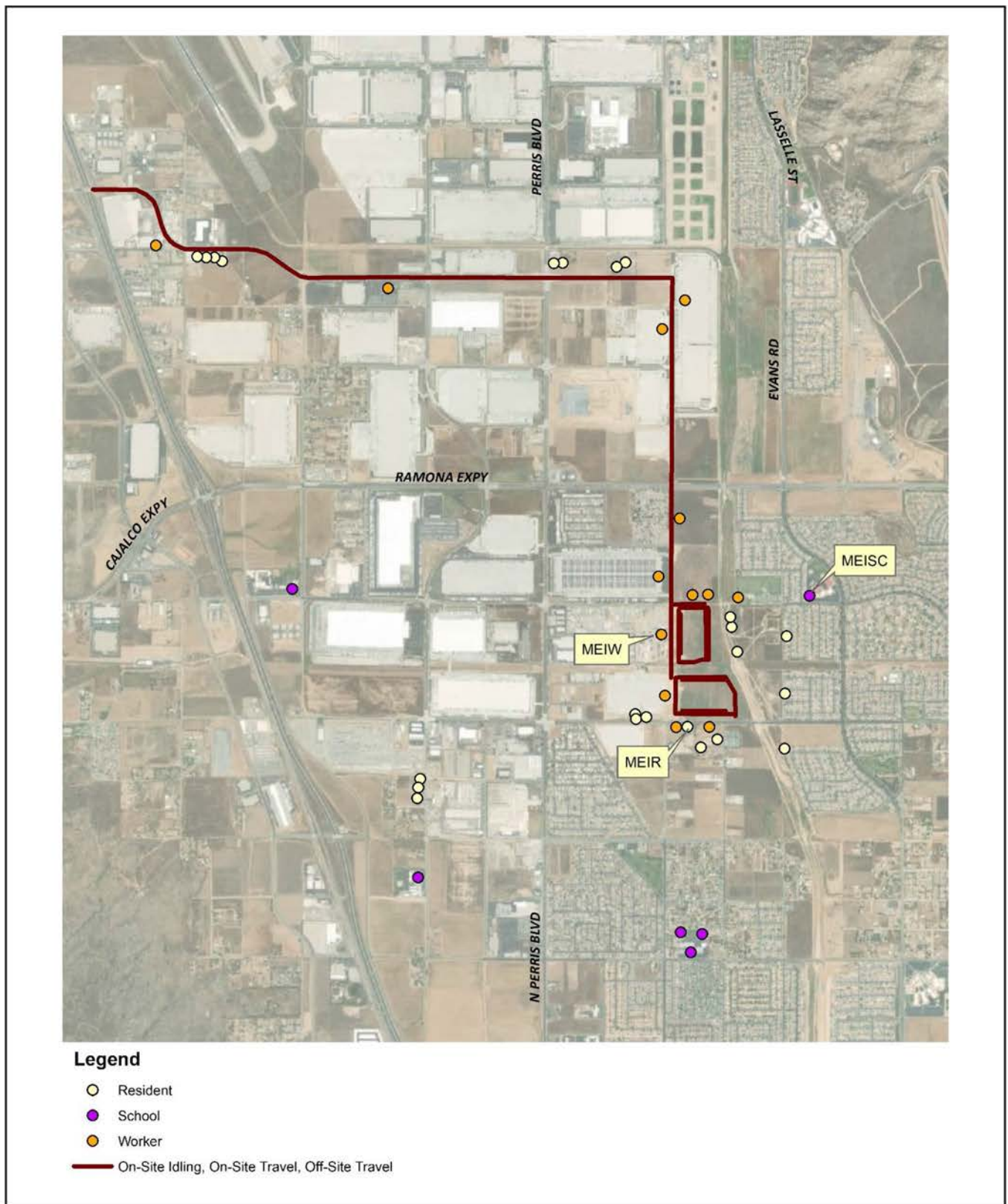
routes, and was modeled to determine the potential impacts to sensitive receptors along the primary truck routes. The modeled emission sources and sensitive receptors are illustrated on Figure 4.3-2, *Modeled Emission Sources – With Use of Harley Knox/I-215 Interchange*.

On-site truck idling was estimated to occur as trucks enter and travel through the facility. Although the Project is required to comply with CARB's idling limit of 5 minutes, staff at SCAQMD recommends that the on-site idling emissions should be estimated for 15 minutes of truck idling, which would take into account on-site idling which occurs while the trucks are waiting to pull up to the truck bays, idling at the bays, idling at check-in and check-out, etc. As such, this analysis estimated truck idling at 15 minutes, consistent with SCAQMD's recommendation.

SCAQMD recommends using the Environmental Protection Agency's (U.S. EPA's) AERMOD model. For purposes of this analysis, the Lakes AERMOD View (Version 9.7.0) was used to calculate annual average particulate concentrations associated with site operations. Lakes AERMOD View was utilized to incorporate the U.S. EPA's latest AERMOD Version 19191. Based on the US EPA methodology, the Project's modeled sources would result in a release height of 3.49 meters, and an initial lateral dimension of 4.0 meters, and an initial vertical dimension of 3.25 meters.

Receptors may be placed at applicable structure locations for residential and worker property and not necessarily the boundaries of the properties containing these uses because the human receptors (residents and workers) spend a majority of their time at the residence or in the workplace's building, and not on the property line. It should be noted that the primary purpose of receptor placement is focused on long-term exposure. For example, the HRA evaluates the potential health risks to residents and workers over a period of 30 or 25 years of exposure, respectively. As such, even though 30 or 25 years of outdoor exposure is unlikely to occur in practical terms (because of the amount of time spent indoors), the Project's operational HRA assumes that a resident would be exposed over 30 years for 24-hours per day at the exterior of the structure where they reside and that a worker would be exposed over 25 years for 12-hours per day at the exterior of the property where they work, positioned on the property line closest to the Project area. Similarly, the Project's operational HRA evaluates the potential health risks to school children and assumes a school child would be exposed over 9 years for 12-hours per day at the exterior of the school site(s) considered in this analysis. Any impacts to residents or workers located further away from the Project area than the modeled residential and worker receptors would have a lesser impact than disclosed herein.

Tables 2-4 through 2-6 of the Project's operational HRA (Appendix B) summarize the Exposure Parameters for Residents, Offsite Worker, and School exposure scenarios based on 2015 OEHHA Guidelines. Appendix 2.2 to the operational HRA includes the detailed risk calculation. As previously noted, the SCAQMD CEQA Air Quality Handbook (1993) states that emissions of toxic air contaminants (TACs) are considered significant if an HRA shows an increased risk of greater than 10 in one million. Additionally, non-carcinogenic exposures of less than 1.0 are considered less-than-significant. Based on the analysis presented in the Project's operational HRA, the following provides a summary of potential impacts to residents, workers, and school children within the Project's vicinity.



Source(s): Urban Crossroads (07-22-2020)

Figure 4.3-2



Modeled Emission Sources and Receptors – With Use of Harley Knox/I-215 Interchange

- Residential Exposure Scenario: The residential location with the greatest potential exposure to Project DPM source emissions is located approximately 110 feet⁴ south of the Rider 2 building site and represents an existing non-conforming residence within a light industrial-designated land use. At the Maximally Exposed Individual Receptor (MEIR), the maximum incremental cancer risk attributable to Project DPM source emissions is estimated at 7.34 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be 0.003, which would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors are located at a greater distance than the scenario analyze herein, and DPM dissipates with distance from the source, all other residential receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project would not cause a significant human health or cancer risk to adjacent residences.
- Worker Exposure Scenario: The worker receptor land use with the greatest potential exposure to Project DPM source emissions is located immediately adjacent to the west of the Rider 4 building site. At the Maximally Exposed Individual Worker (MEIW), the maximum incremental cancer risk impact at this location is 1.19 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be 0.004, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the scenario analyze herein, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project would not cause a significant human health or cancer risk to adjacent workers.
- School Child Exposure Scenario: The school site land use with the greatest potential exposure to Project DPM source emissions located at the May Ranch Elementary School located more than 2,000 feet east of the Project area. At the Maximally Exposed Individual School Child (MEISC), the maximum incremental cancer risk impact attributable to the Project at this location is calculated to be an estimated 0.22 in one million which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the Project were calculated to be 0.0004, which would not exceed the applicable significance threshold of 1.0. Any other schools near the Project area would be exposed to less emissions and consequently less impacts than what is disclosed for the MEISC. As such, the Project would not cause a significant human health or cancer risk to nearby school children.

Accordingly, and based on the preceding analysis, when assuming use of the existing Harley Knox Boulevard interchange with I-215, the Project's operational DPM emissions would not expose nearby sensitive receptors to a cancer risk impact greater than 10 in one million, and would not result in non-cancer risks exceeding the applicable significance threshold of 1.0. As such, Project-related operational DPM emissions would not expose nearby sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. (Urban Crossroads, 2020b)

⁴ For purposes of the HRA it is appropriate to place the modeled receptor at the actual building facade, or where an individual would have the propensity to stay for a long-term duration over a 30-year exposure scenario. The AQIA evaluates potential impacts from localized emissions over 1, 8, and 24-hour periods and therefore uses a different distance of measuring to the property line, which results in a different distance of 50 feet. The HRA appropriately evaluates the potential impacts that could occur at a residential occupancy based on where an individual could reasonably remain over the course of 30 years.

It should be noted that the Placentia Avenue interchange at I-215 is anticipated to be completed and operational in 2021. As such, the City required assessment of potential traffic impacts assuming use of this new interchange. Under this condition, and for purposes of analysis, it was assumed that all of the Project traffic would use the future Placentia Avenue interchange at I-215, rather than the Haley Knox interchange. This assumption overstates the Project's risks, because it is unlikely that all Project traffic would use this future interchange, with no Project traffic using existing the Harley Knox interchange. Accordingly, an HRA was also prepared to analyze the Project's mobile-source DPM emissions based on the use of the Placentia Avenue/I-215 interchange and is also included in Appendix B of this EIR (Placentia Avenue HRA) (Urban Crossroads, 2020c). The modeled emissions sources under this scenario are shown in Figure 4.3-3, Modeled Emission Sources – With Use of Placentia Avenue/I-215 Interchange.

The Placentia Avenue HRA concludes the Project's operational DPM emissions would not expose nearby sensitive receptors to a cancer risk impact greater than 10 in one million, and would not result in non-cancer risks exceeding the applicable significance threshold of 1.0. As such, Project-related operational DPM emissions, when assuming truck traffic using the future Placentia Avenue interchange at I-215, would not expose nearby sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

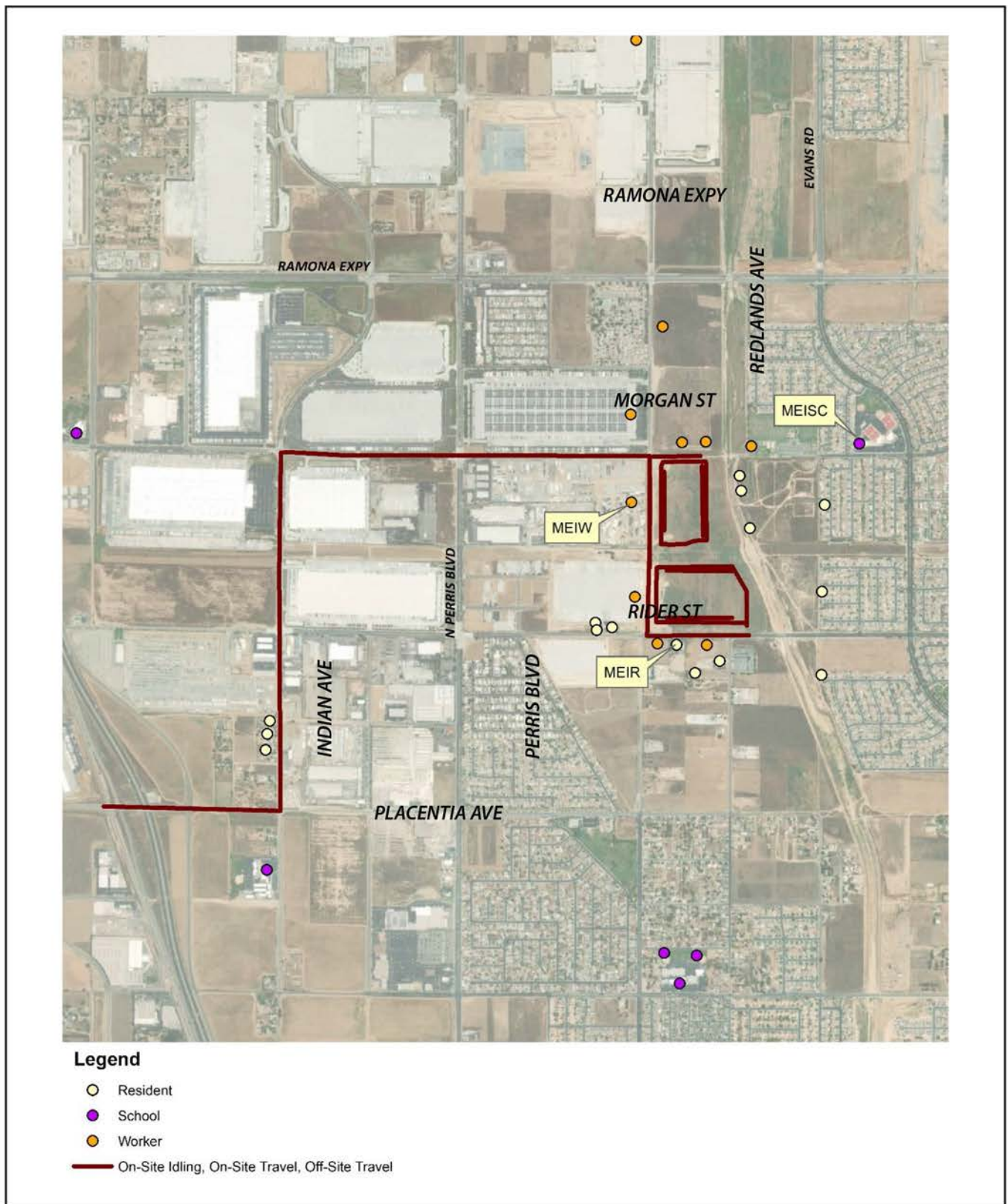
CO "Hot Spots"

As discussed below, the Project would not result in potentially adverse CO concentrations or "hot spots." Further, detailed modeling of Project-specific CO "hot spots" is not needed to reach this conclusion. An adverse CO concentration, known as a "hot spot", would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. At the time of the CEQA Handbook, the SoCAB was designated nonattainment under the CAAQS and NAAQS for CO.

It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SoCAB is now designated as attainment, as noted in Table 2-3 of the Project's AQIA (Appendix B).

To establish a more accurate record of baseline CO concentrations affecting the SoCAB, a CO "hot spot" analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This "hot spot" analysis did not predict any violation of CO standards, as shown on Table 3-17 of the Project's AQIA (Appendix B).

Based on the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak CO concentrations in the SoCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, for example, 9.3 ppm 8-hour CO concentration measured at the Long Beach Boulevard and Imperial Highway intersection (highest CO generating intersection within the "hot spot" analysis), only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 8.6



Source(s): Urban Crossroads (07-22-2020)

Figure 4.3-3



Modeled Emission Sources and Receptors – With Use of Placentia Avenue/I-215 Interchange

ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. In contrast, the ambient 8-hour CO concentration within the Project study area is estimated at 0.6 ppm-0.8 ppm (please refer to Table 2-4 of the Project's AQIA). Therefore, even if the traffic volumes for the Project were double or even triple of the traffic volumes generated at the Long Beach Boulevard and Imperial Highway intersection, coupled with the on-going improvements in ambient air quality, the Project would not be capable of resulting in a CO "hot spot" at any study area intersections. Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph) – or 24,000 vph where vertical and/or horizontal air does not mix – in order to generate a significant CO impact.

The 2003 AQMP, and as shown in Table 3-17 of the Project's AQIA, estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (4.6 ppm x 4= 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm). As shown on Exhibit 8-3 of the Project's Traffic Impact Analysis (Appendix L of this EIR) (Urban Crossroads, 2020d), the highest average daily trips on a segment of road would be 50,000 daily trips on Perris Boulevard and Ramona Expressway.

Traffic volumes generating the CO concentrations for the "hot spot" analysis is shown on Table 3-18 of the Project's AQIA (Appendix B). The busiest intersection evaluated for AM traffic volumes was at Wilshire Boulevard and Veteran Avenue, which has an AM traffic volume of approximately 8,062 vph. Alternatively, the busiest intersection for PM traffic volumes was at La Cienega Boulevard and Century Boulevard, which has a PM traffic volume of 8,674 vph. As shown on Table 3-19 of the Project's AQIA (Appendix B), the highest trips on a segment of road for the Project is 5,639 vph on Perris Boulevard and Ramona Expressway. As such, Project-related traffic volumes are less than the traffic volumes identified in the 2003 AQMP.

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

Disadvantaged Communities

With respect to the Community Air Protection Program (CAPP) (AB 617), each year CARB's governing board (Board) is required to consider selecting communities for participation in the CAPP. Communities are selected for developing community air monitoring systems, emissions reduction programs, or both in order to improve air quality in their community. Over the first two years of the CAPP (2018 and 2019), the Board selected 13 communities where these focused actions are underway (CARB, 2019). The City of Perris is not one of the selected communities, and to date has not been nominated to participate in the CAPP (CARB, 2020).

As previously discussed, CalEviroscreen is a general mapping tool developed by OEHHA to help identify California communities that are most affected by sources of pollution. The Project area and its immediately surrounding area are designated by CalEPA as being part of a disadvantaged community for the purpose of SB 535. SB 535 targets disadvantaged communities in California for investment of

proceeds from the State's cap-and-trade program to improve public health, quality of life, and economic opportunity in California's most burdened communities, while also reducing pollution. The Project entails the development of two industrial warehouse buildings, which would bring jobs and other economic opportunities to the local area without State assistance. The environmental effects of the Project are fully evaluated in this EIR and feasible mitigation measures are identified for significant impacts that are within the City of Perris's jurisdictional authority to impose and enforce as required by the State CEQA Statute and Guidelines. This EIR provides a disclosure of localized impacts which may affect this CalEPA-designated disadvantaged community. As indicated in the preceding analysis, the Project's construction and operational localized emissions would not exceed the SCAQMD LST thresholds, and the Project would not result in significant health impacts due to DPM emissions. The Project also would not cause or contribute to any CO "hot spots."

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

Threshold d Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Odors would be emitted during construction and operation of uses allowed under the PVCCSP, including industrial uses as proposed with the Project. The PVCCSP EIR (Section 4.2, Air Quality) concludes that, because of the short-term duration and quantity of emissions during construction and the limited outdoor exposure of persons to odors, odor impacts from construction of projects in the Specific Plan area would be less than significant.

Land uses generally associated with odor complaints include: agricultural uses (livestock and farming); wastewater treatment plants; food processing plants; chemical plants; composting operations; refineries; landfills; dairies; and fiberglass molding facilities. The Project does not propose or require any additional land uses typically associated with emitting objectionable odors. Other potential odor sources associated with the Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. The Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the Project construction and operations would be less than significant and no mitigation is required. (Urban Crossroads, 2020a)

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

4.3.6 CUMULATIVE IMPACTS

As indicated under the analysis of Threshold a, the Project would not result in a conflict with the SCAQMD 2016 AQMP. As such, cumulatively-considerable impacts due to a conflict with the AQMP would be less than significant.

As previously discussed, the CAAQS designate the Project area as nonattainment for O₃, PM₁₀, and PM_{2.5} while the NAAQS designates the Project area as nonattainment for O₃ and PM_{2.5}. The AQMD has published a report on how to address cumulative impacts from air pollution, and projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. Therefore, this analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the SoCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable.

As indicated under the analysis for Threshold b, after implementation of applicable mitigation measures from the PVCCSP EIR, emissions resulting from the Project construction would exceed the regional thresholds established by the SCAQMD for NO_x emissions. The exceedance of the NO_x threshold is primarily associated with the overlap in construction activities and associated vendor trips. Additionally, even with implementation of the PVCCSP EIR operational mitigation measures and additional Project-specific mitigation measures MM 3-1 through MM 3-14, operational NO_x emissions would also exceed the regional significance thresholds. The operational emissions are primarily associated with vehicle emissions. The City of Perris and the Project Applicant do not have regulatory authority to control tailpipe emissions and no additional feasible mitigation measures beyond the measures identified herein exist that would reduce NO_x emissions to levels below the regional thresholds established by the SCAQMD. Therefore, construction and operation of the Project would contribute to existing violations of the O₃ standard (NO_x is an O₃ precursor), and the Project would result in a significant and unavoidable cumulatively considerable net increase of a criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.

Project construction and operational-source localized emissions would not exceed the SCAQMD's LSTs for any criteria pollutant. Thus, the Project's localized emissions during construction and operation would be less-than-cumulatively considerable.

With respect to cumulative TAC emissions, as discussed in Section 2.7 of the Project-specific HRA included in Appendix B of this EIR, there are no state or federal ambient air quality standards applicable to TAC emissions. Preparing a cumulative assessment for TACs is complicated by the fact that site-specific impacts can be far different from average impacts over a larger geographic area. Impacts from

TAC emissions are highest closest to sources of TACs, but the sources are often spread over a large area. For purposes of cumulative TAC assessment, a one-quarter mile radius or 1,320 feet geographic scope is utilized for determining potential cumulative impacts. This radius is more robust than, and provides a more health protective scenario for evaluation than the recommended 1,000-foot impact radius as discussed in Section 2.7.2, Justification of the Geographic Scope of the Analysis, of the HRA included in Appendix B.

The primary TAC-source emission associated with the cumulative projects identified in the HRA would be DPM associated with any truck trips accessing the cumulative projects and traveling on roadways in the study area. As such, the estimated health risks from these cumulative projects was totaled. The total maximum estimated cancer risk associated with the cumulative projects identified above is estimated to be 29.36 in one million. This estimate is based on available published environmental documentation – only known available risk estimates have been presented since it would be too speculative to estimate the risk values for other projects without knowing significant project-related information for each cumulative development. It is important to note that the risk value of 29.36 from related projects is likely a very conservative overstatement of the actual risk that is likely to occur at any given location. As a conservative measure to overstate rather than understate the potential risk impacts this analysis assumes that the maximum impact from each related project overlaps and would occur at the same location in the Project vicinity.

Project-source TACs would incrementally increase the cumulative cancer risk by a maximum of 7.34 incidents per million population. As previously identified, the applicable SCAQMD significance threshold for Project-level TAC-source cancer risk impacts is 10 incidents per million population. Similarly, SCAQMD significance thresholds state that Project contributions to cumulative TAC-source cancer risks would be cumulatively considerable if greater than 10 incidents per million population would occur. The 7.34 incidents per million population increment resulting from the Project is therefore not significant, nor cumulatively considerable. It should be noted that although there will be ambient growth in the Project vicinity, any increase in emissions and consequently cancer risk from ambient growth would be offset by the expected decrease in future risk estimates due to the natural turnover of older fleets and equipment being replaced by more efficient, less polluting engines and regulatory actions being phased in.

With respect to odors, the Project does not include any land uses associated with the generation of odors or other emissions that could adversely affect a substantial number of people. Odors associated with the Project would occur during construction and operation. Construction-related odors would include construction equipment exhaust and the application of asphalt and architectural coatings, which would be temporary, short-term, and intermittent in nature, and would not contribute to any cumulatively-considerable odor impacts in the local area. Additionally, Project operational-related refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. There are no components of the Project that could result in odors adversely affecting a substantial number of people; thus, Project-related odor impacts would be less-than-cumulatively considerable.

4.3.7 REFERENCES

CARB, 2018. California Air Resources Board. *Airborne Toxic Control Measure for Diesel Particulate Matter from Portable Engines Rated at 50 Horsepower and Greater*. November 30, 2018. Available at <https://ww2.arb.ca.gov/sites/default/files/2018-11/Portable%20Engine%20ATCM.pdf>

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- Urban Crossroads, 2019. *Construction Health Risk Assessment Memorandum*. November 16, 2019. Included in Appendix B of this EIR.
- Urban Crossroads, 2020a. *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project – Air Quality Impact Analysis*. July 22, 2020. Included in Appendix B of this EIR.
- Urban Crossroads, 2020b. *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Mobile Source Health Risk Assessment*. July 22, 2020. Included in Appendix B of this EIR.
- Urban Crossroads, 2020c. *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Focused Mobile Source Health Risk Assessment (with I-215 Freeway/Placentia Avenue Interchange)*. July 22, 2020. Included in Appendix B of this EIR.
- Urban Crossroads, 2020d. *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Traffic Impact Analysis, City of Perris*. May 15, 2020. Included in Appendix L of this EIR.

4.4 BIOLOGICAL RESOURCES

This section assesses the potential for the Project to impact biological resources. Unless otherwise noted, the analysis in this section is based on information contained in the following Project-specific technical reports prepared by Glenn Lukos Associates, Inc. (GLA), which are included in Appendix C of this Environmental Impact Report (EIR):

- *Biological Technical Report for the Rider 2 and Rider 4 Warehouse Project* (September 10, 2020)
- *Biological Technical Report for Phase I Perris Valley Storm Drain Channel Improvement Project* (September 10, 2020)

There were no comments received on the Notice of Preparation (NOP), or during the public scoping meeting for this EIR that addressed biological resources.

The biological technical reports included the review of relevant literature, field surveys, and a geographic information system (GIS)-based analysis of vegetation communities. The field surveys focused on a number of primary objectives that would comply with California Environmental Quality Act (CEQA) and Western Riverside County Multiple-Species Habitat Conservation Plan (MSHCP) requirements, including (1) general reconnaissance survey and vegetation mapping; (2) general biological surveys; (3) habitat assessments for special-status plant species (including species with applicable MSHCP survey requirements); (4) habitat assessments for special-status wildlife species (including species with applicable MSHCP survey requirements); (5) assessment for the presence of wildlife migration and colonial nursery sites; (6) assessments for MSHCP riparian/riverine areas and vernal pools; and (7) assessments for areas subject to the jurisdiction of the U.S. Army Corps of Engineers (Corps) jurisdiction pursuant to Section 404 of the Clean Water Act (CWA), State Water Quality Control Board pursuant to Section 401 of the CWA and Section 13260 of the California Water Code (CWC), and California Department of Fish and Wildlife (CDFW) jurisdiction pursuant to Division 2, Chapter 6, Section 1600–1617 of the California Fish and Game Code. Observations of plant and wildlife species were recorded during the biological studies and are included in the Project-specific technical reports included in Appendix C, of this EIR. Refer to the biological technical reports included in Appendix C for detailed descriptions of the survey dates, scopes of study, and research and survey methodologies used in the reports.

4.4.1 EXISTING SETTING

The Rider 2 and Rider 4 building sites and site-adjacent off-site improvement areas consist primarily of agricultural lands that are heavily disturbed due to frequent disking dating back to at least June 2002 as visible on historical aerial imagery. The perimeter of the area is disturbed and largely unvegetated while the interior of the Project area is comprised of ruderal vegetation. The PVSD Channel is an engineered flood control channel that is mowed and maintained on an annual basis by the Riverside County Flood Control & Water Conservation District (RCFC&WCD). The PVSD is tributary to the San Jacinto River, which is ultimately tributary to Lake Elsinore, which is ultimately tributary to the Santa Ana River, which is tributary to the Pacific Ocean.

As further discussed in Section 4.4.2, Existing Policies and Regulations, the Project study area is located within the Mead Valley Area Plan of the MSHCP. The Project is not within an MSHCP Criteria Cell, and

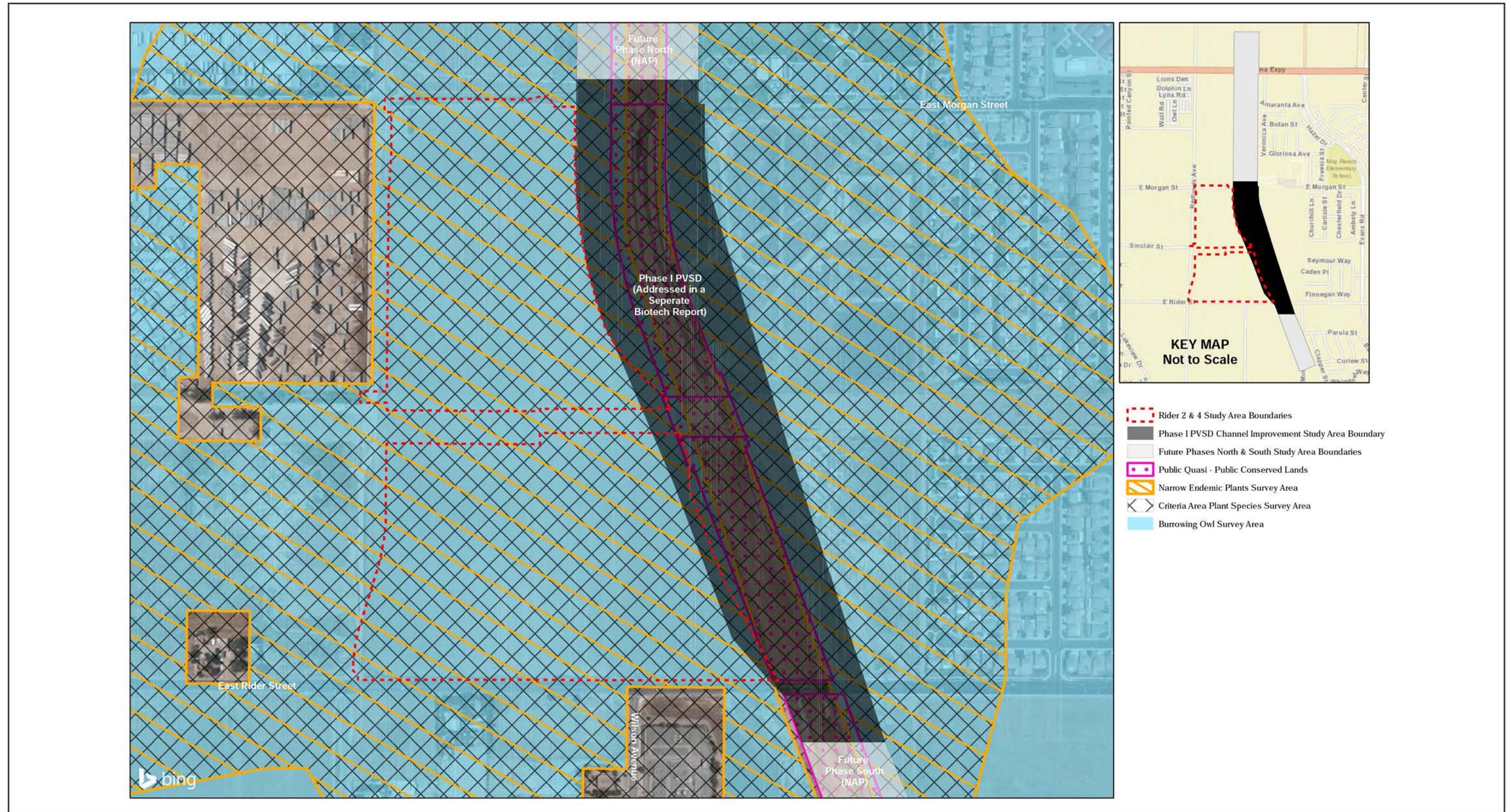
does not occur within any MSHCP Core or Linkage Area, or Mammal or Amphibian Survey Areas. The Project includes Phase I improvements to the PVSD Channel, which is a water feature that is mapped as Public/Quasi-Public (PQP) Conserved Lands. The Project study area is located within the Narrow Endemic Plant Species Survey Areas (NEPSSA), Criteria Area Plant Species (CAPSSA), and Burrowing Owl Survey Area. Refer to Figure 4.4-1, Western Riverside County MSHCP Overlay Map and Figure 4.4-2, Western Riverside County MSHCP Overlay Map – PVSD Channel.

Information below describes the existing environmental setting based on information obtained from the Project-specific biological technical reports (Appendix C). Specifically, the existing conditions in this section reflect those that were observed during the field study for the Project study area, which includes on- and off-site Project features, and the PVSD Channel improvement area, conducted by GLA on various days in August 2018.

Vegetation Communities

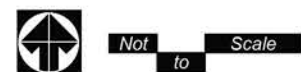
Based on vegetation mapping conducted by GLA, the proposed Rider 2 and Rider 4 building sites and associated site-adjacent off-site impact areas contain two vegetation communities: disturbed/developed and ruderal (refer to Figure 4.4-3, Existing Vegetation Communities – Building Sites and Off-Site Impact Area). The PVSD Channel improvement area contains four vegetation communities: developed, ruderal (upland), ruderal (channel), and disturbed southern riparian scrub (refer to Figure 4.4-4, Existing Vegetation Communities – PVSD Channel Improvement Area). These vegetation communities are described below.

- **Developed.** The building sites and off-site impact areas contain approximately 0.8-acre of disturbed/developed land consisting of regularly maintained dirt roads and a gravel-substrate maintenance area adjacent to the PVSD Channel. The PVSD Channel improvement area contains approximately 7.28 acres of developed land use, which consists of maintained asphalt and dirt access roads, concrete sidewalks, and asphalt pedestrian paths, concrete aprons, unvegetated inlet/outlet features, riprap, and ornamentally planted vegetation associated with the adjacent Morgan Park.
- **Ruderal.** The buildings sites and off-site impact area contain approximately 68.71 acres of ruderal vegetation. Ruderal species consist of weedy non-native species including broad-leaved pepperweed (*Lepidum latifolium*), Russian thistle (*Salsola tragus*), short-podded mustard (*Hirschfeldia incana*), and tree tobacco (*Nicotiana glauca*). This part of the Project Study Area is routinely disced. The PVSD Channel improvement area contains approximately 23.99 acres of ruderal (upland) vegetation that is dominated by weedy non-native plant species, such as black mustard (*Brassica nigra*), Russian thistle (*Salsola tragus*), and stinknet (*Oncosiphon piluliferum*), with patches of bare ground throughout.
- **Ruderal (Channel).** The PVSD Channel improvement area contains approximately 7.69 acres of ruderal (channel) vegetation. The majority of the PVSD Channel is comprised of a maintained, largely bare channel bottom with locally dense patches of weedy plant species, including Bermuda grass (*Cynodon dactylon*), English plantain (*Plantago lanceolata*), rough cocklebur (*Xanthium strumarium*), Russian thistle, stinknet, western ragweed (*Ambrosia psilostachya*), and white sweet clover (*Melilotus albus*).

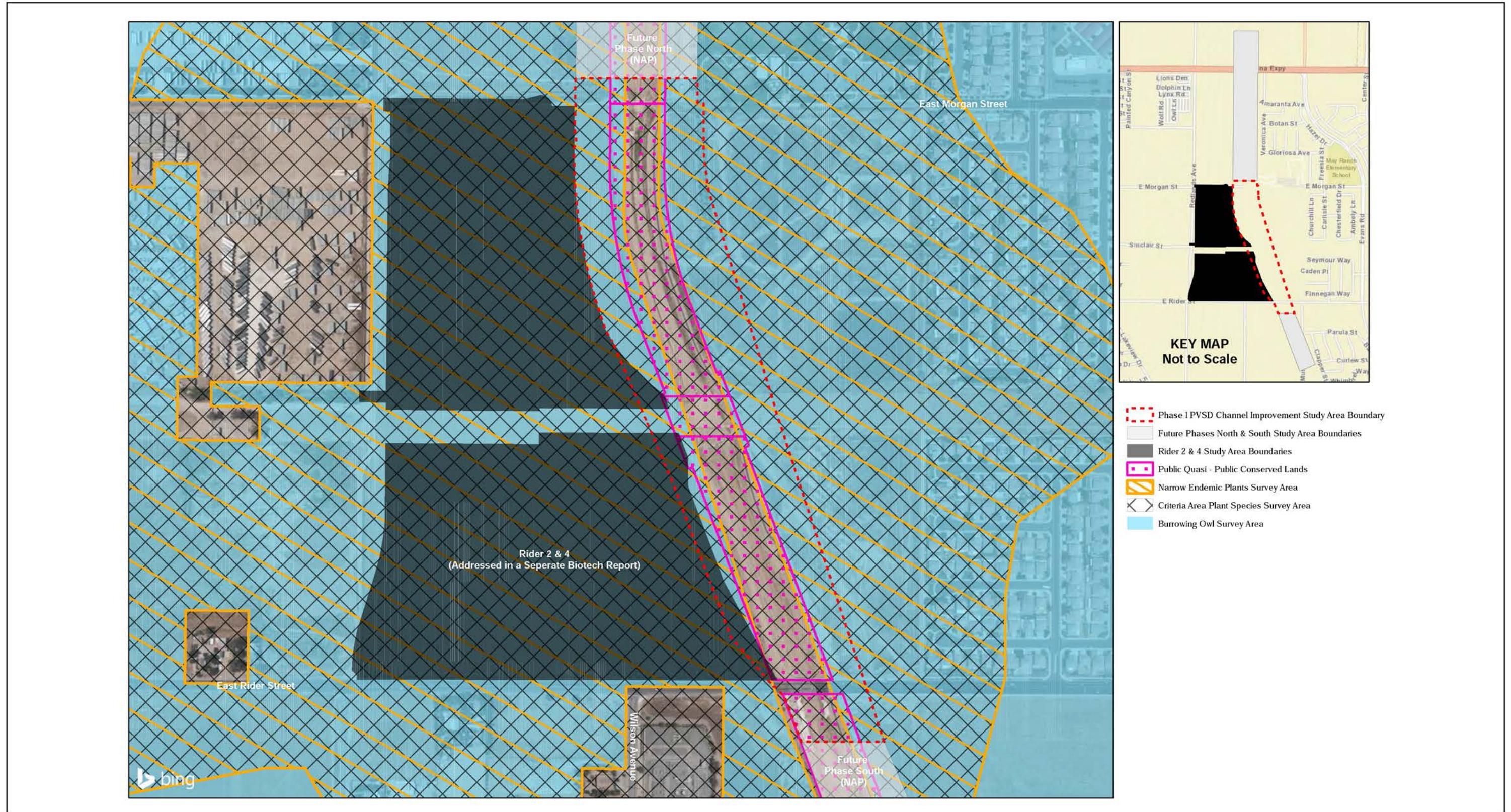


Source(s): Glenn Lukos Associates, Inc. (11-12-2019)

Figure 4.4-1



Western Riverside County MSHCP Overlay Map – Rider 2 and Rider 4 Sites



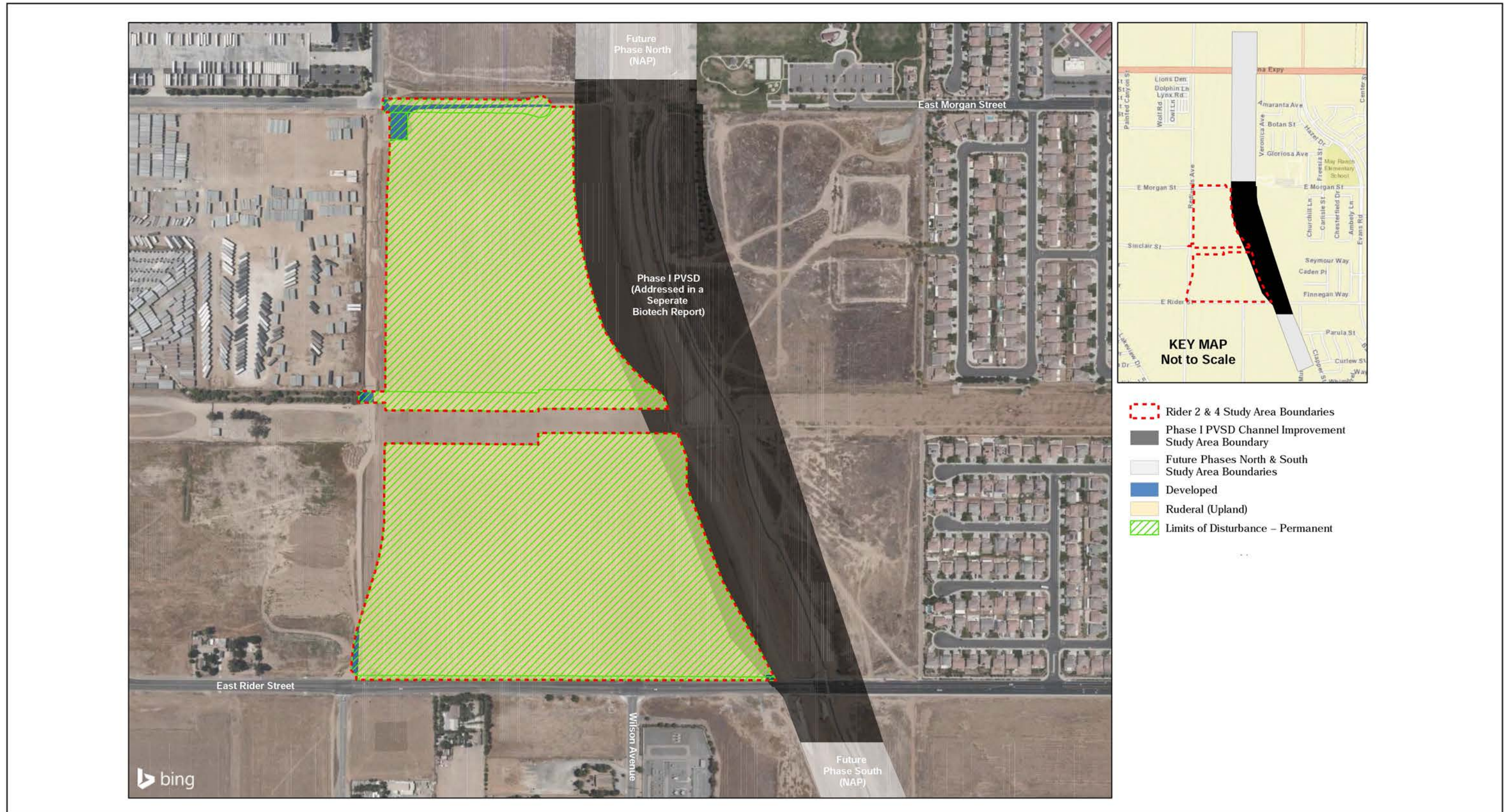
Source(s): Glenn Lukos Associates, Inc. (03-13-2020)

Figure 4.4-2



Western Riverside County MSHCP Overlay Map – PVSD Channel

Lead Agency: City of Perris

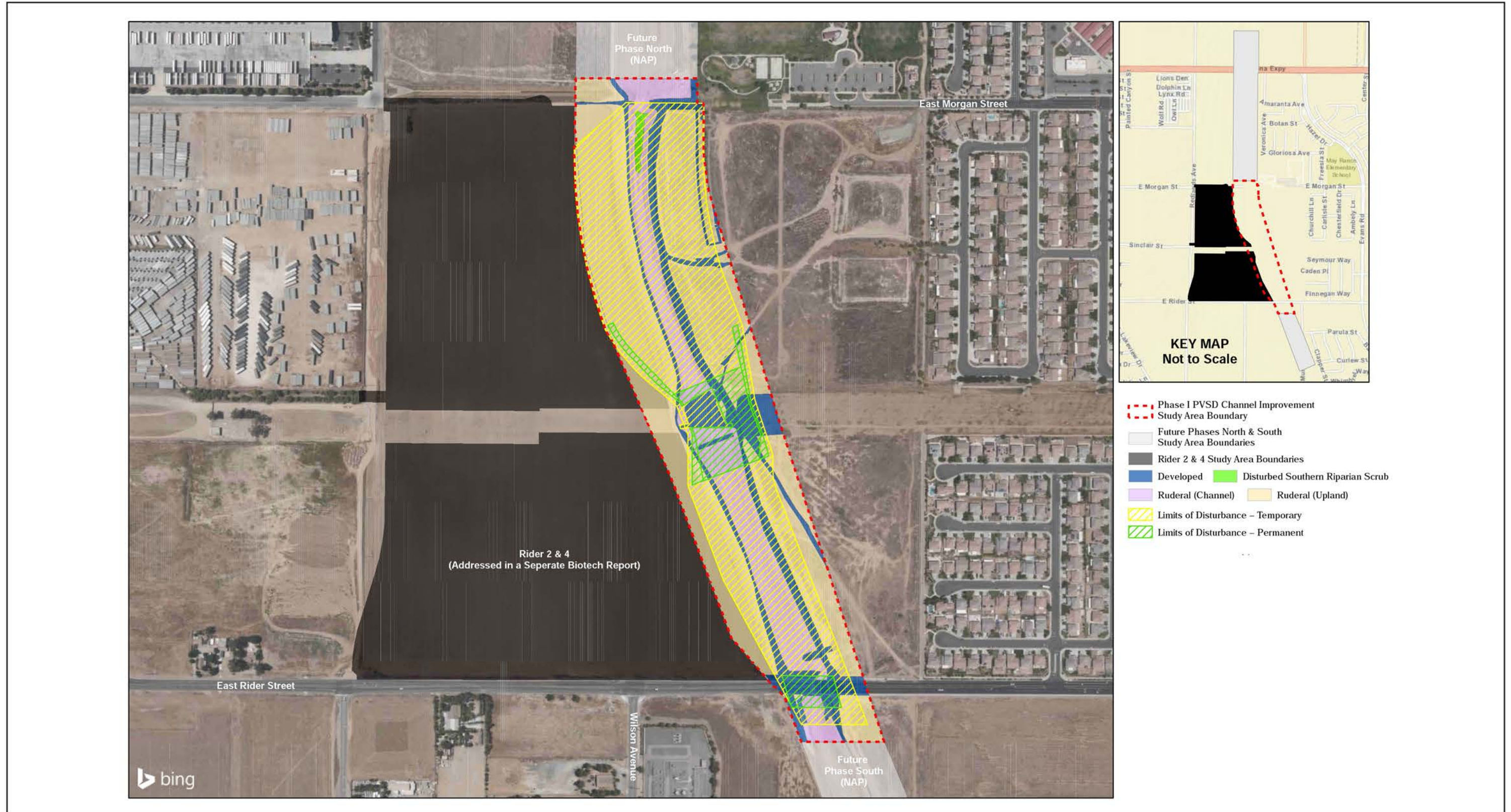


Source(s): Glenn Lukos Associates, Inc. (11-12-2019)

Figure 4.4-3



**Existing Vegetation Communities –
Building Sites and Off-Site Impact Area**



Source(s): Glenn Lukos Associates, Inc. (03-13-2020)

Figure 4.4-4



**Existing Vegetation Communities –
PVSD Channel Improvement Area**

- **Disturbed Southern Riparian Scrub.** The PVSD Channel improvement area contains approximately 0.2-acre of disturbed southern riparian scrub. This vegetation type occurs in a relatively discrete patch in the approximate center of the PVSD, immediately south of East Morgan Street. Dominant disturbed southern willow scrub species include black willow saplings (*Salix gooddingii*), rough cocklebur, and salt cedar (*Tamarix ramosissima*).

There are no vegetation communities within the Project study area that would be classified as a “sensitive” vegetation community under CEQA.

Special-Status Plants

As previously identified, the Project study area is located within the CAPSSA and NEPSSA. Pursuant to the MSHCP, the following target species must be evaluated through habitat assessments and focused surveys (if suitable habitat is present): California Orcutt grass (*Orcuttia californica*), Coulter’s goldfields (*Lasthenia glabrata* ssp. *Coulteri*), Davidson’s saltscale (*Atriplex serenana* var. *davidsonii*), little mousetail (*Myosurus minimus* ssp. *Apus*), mud nama (*Nama stenocarpum*), Parish’s brittlescale (*Atriplex parishii*), round-leaved filaree (*Erodium macrophyllum*), San Diego ambrosia (*Ambrosia pumila*) (*Ambrosia pumila*), San Jacinto valley crownscale, smooth tarplant, spreading navarretia (*Navarretia fossalis*), thread-leaved brodiaea (*Brodiaea filifolia*), and Wright’s trichocoronis (*Trichocoronis wrightii* var. *wrightii*). Table 4-2 of the biological technical reports included in Appendix C provide a list of special-status plants evaluated through general biological surveys and habitat assessments. Species were evaluated based on the following factors: 1) species identified by the CNDDDB and CNPS as occurring (either currently or historically) on or in the vicinity of the Project study area, 2) applicable MSHCP survey areas, 3) any other special-status plants that are known to occur within the vicinity of study area, or for which potentially suitable habitat occurs onsite.

GLA biologists visited the study area on August 29, 2018 to conduct focused habitat evaluations for sensitive plants, the results of which indicated that focused botanical surveys would not be necessary. No NEPSSA, CAPSSA, or other special-status plant species were observed within the study area. No special-status plant species are expected to occur within the study area due to the lack of suitable habitat.

Special-Status Animals

No special-status animal species were detected in the Project study area. The following six species have a low potential to forage in the study area based on the physical characteristics of the property and the current and/or historical distribution of the species: golden eagle (*Aquila chrysaetos*), loggerhead shrike (*Lanius ludovicianus*), northern harrier (*Circus cyaneus*), San Diego black-tailed jackrabbit *Lepus californicus bennettii*), coastal whiptail (*Aspidoscelis tigris stejnegeri*), and Stephen’s kangaroo rat (*Dipodomys stephensi*). All of these species are covered species under the MSHCP; therefore, no surveys are required.

Burrowing Owl

As previously discussed, the Project is located within the MSHCP survey area for the burrowing owl (*Athene cunicularia*). GLA biologists conducted focused surveys for the burrowing owl in all suitable habitat within the Project study area. As discussed in the biological resources technical reports included in Appendix C, focused surveys were conducted in accordance with survey guidelines described in the

2006 MSHCP Burrowing Owl Survey Instructions. The methods for the focused surveys are summarized herein and detailed in the biological technical reports. The guidelines stipulate that four focused survey visits be conducted on separate dates between March 1 and August 31. Within areas of suitable habitat, the MSHCP first requires a focused burrow survey to map all potentially suitable burrows. The focused burrow survey was conducted on August 16, 2018. Focused burrowing owl surveys were conducted on August 16, 20, 23, and 27, 2018. Surveys were conducted by walking meandering transects throughout areas of suitable habitat, which included the entire Project study area (refer to Figure 4.4-5, Burrowing Owl Survey Area Map – Rider 2 and Rider 4 Sites and Figure 4.4-6, Burrowing Owl Survey Area Map – PVSD Channel Improvement Area). All suitable burrows were inspected for diagnostic owl sign (e.g., pellets, prey remains, whitewash, feathers, bones, and/or decoration) in order to identify potentially occupied burrows. An additional buffer of approximately 500 feet beyond the Project study area was also visually surveyed using binoculars for presence of burrowing owl.

No burrowing owl were observed utilizing the Project study area and no burrowing owl sign was detected. However, during the focused survey conducted in August 2018, a single burrowing owl was observed off site approximately 88 feet north of the Rider 4 building site.

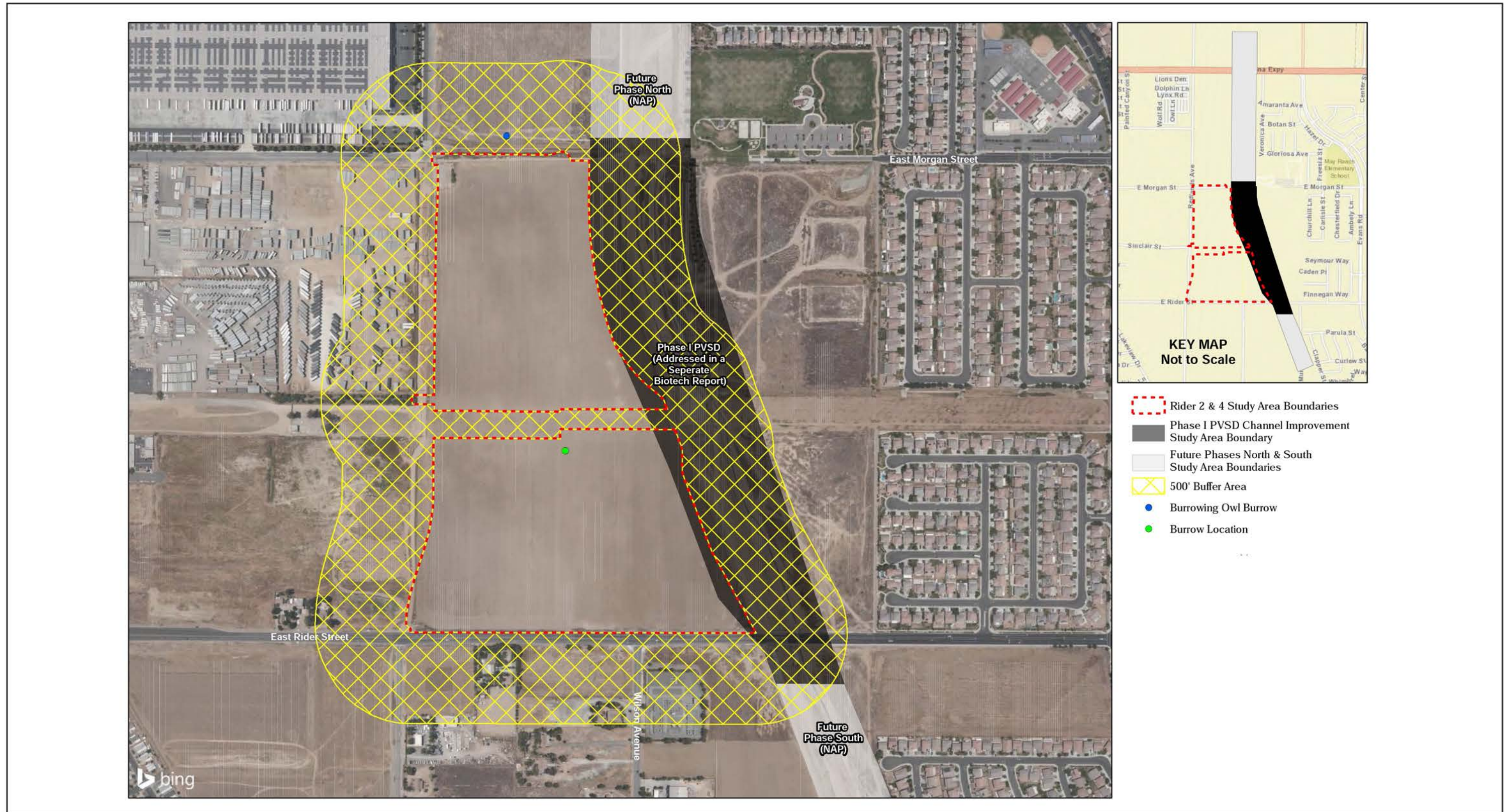
Raptors

The Project Study Area provides marginally suitable foraging habitat for a number of raptor species, including special-status raptors. Southern California holds a diversity of birds of prey (raptors), and many of these species are in decline. For most of the declining species, foraging requirements include extensive open, undisturbed, or lightly disturbed areas, especially grasslands. This type of habitat has declined severely in the region, affecting many species, but especially raptors. A few species, such as Red-tailed Hawk (*Buteo jamaicensis*), are somewhat adaptable to low-level human disturbance and can be readily observed adjacent to neighborhoods and other types of development. These species still require appropriate foraging habitat and low levels of disturbance in vicinity of nesting sites.

Many of the raptors that would be expected to forage and nest within western Riverside are fully covered species under the MSHCP with the MSHCP providing the necessary conservation of both foraging and nesting habitats. Some common raptor species (e.g., red-tailed Hawk) are not covered by the MSHCP but are expected to be conserved with implementation of the MSHCP due to the parallel habitat needs with those raptors covered under the Plan. The MSHCP does not provide Fish and Game Code take for raptors covered under the MSHCP.

The faunal compendium included in the biological technical reports included in Appendix C provide a list of the raptors detected over the course of the field studies. A single raptor species, red-tailed hawk, was observed. Great horned owl (*Bubo virginianus*) and barn owl (*Tyto alba*) may also forage in the study area. Additionally, as noted above, burrowing owl was observed generally adjacent to the Project area to the north within an off-site property.

The Project study area lacks potential nesting habitat (e.g., mature trees, tall shrubs) for these and other raptor species but is expected to provide foraging marginal habitat for all of these species in the form of insects, spiders, lizards, snakes, small mammals, and other birds.



Source(s): Glenn Lukos Associates, Inc. (11-12-2019)

Figure 4.4-5



Burrowing Owl Survey Area Map – Rider 2 and Rider 4 Sites



Source(s): Glenn Lukos Associates, Inc. (03-13-2020)

Figure 4.4-6



Burrowing Owl Survey Area Map – PVSD Channel Improvement Area

Nesting Birds

Although no active bird nests were observed, the Project study area contains shrubs and ground cover that provide marginal suitable nesting sites for nesting migratory bird species such as killdeer (*Charadrius vociferus*) and mourning dove (*Zenaida macroura*).

Jurisdictional Waters and Wetlands

The building sites and site-adjacent off-site impact areas do not support any drainages, water courses, vernal pools, or wetland habitats that would be under the jurisdiction of the Corps, CDFW, and/or the Regional Water Quality Control Board (RWQCB). Additionally, no MSHCP riparian/riverine resources, vernal pools, or seasonal pools present within the building sites and site-adjacent off-site impact areas. However, there are jurisdictional areas present in the PVSD Channel improvement study area, as discussed below.

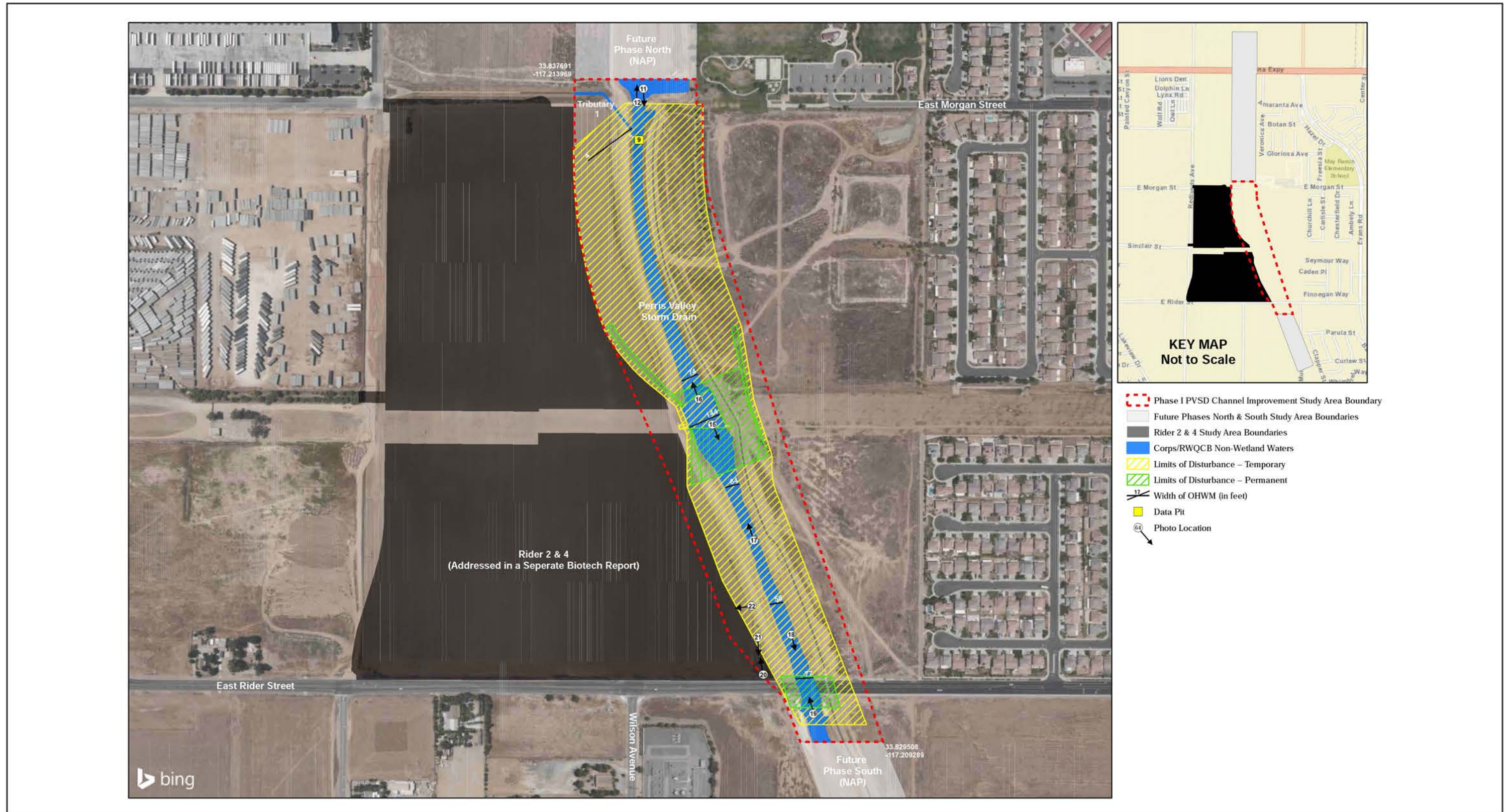
Army Corps of Engineers Jurisdiction

Waters of the U.S. (WoUS) subject to the jurisdiction of the Corps are limited to the segment of the PVSD Channel and Tributary 1 within the study area. Total Corps jurisdiction associated with the study area is 4.98 acres, none of which consists of jurisdictional wetlands. A total of 3,491 linear feet of streambed are present within the study area. The extent of WoUS is depicted on Figure 4.4-7, Corps/RWQCB Jurisdictional Delineation Map.

Corps jurisdiction within the study area associated with the PVSD Channel totals approximately 4.94 acres, none of which consists of jurisdictional wetlands. The PVSD is a man-made, engineered feature constructed for flood control purposes, which is maintained and mowed annually. The PVSD flows from north to south for 3,134 linear feet within the study area and ranges in width from approximately 52 feet to 144 feet wide. The PVSD is tributary to the San Jacinto River, which is ultimately tributary to Lake Elsinore, which is ultimately tributary to the Santa Ana River, which is tributary to the Pacific Ocean, a TNW. Corps jurisdiction is extended to the limits of the ordinary high-water mark (OHWM), which was determined based on the presence of litter and debris, changes in the character of soil, natural lines impressed on the bank, and destruction of terrestrial vegetation.

The PVSD segment within the study area is frequently disked and heavily maintained which does not allow the formation of wetland soils, hydrology or the establishment of wetland vegetation. As the portion of the PVSD within the study area does not exhibit wetland characteristics, that portion is considered non-wetland waters. Photographs depicting the portion of the PVSD Channel within the study area wetland data sheets are included in the technical report provided in Appendix C.

Corps jurisdiction within the study area associated with Tributary 1 totals 0.04 acre, none of which consists of jurisdictional wetlands. Tributary 1 is an offsite tributary located near the intersection of Morgan Street and Redlands Avenue. Tributary 1 begins at this intersection and flows for 357 linear feet from west to east across the study area before discharging into the PVSD. Tributary 1 is a man-made drainage feature which does not support vegetation.



Source(s): Glenn Lukos Associates, Inc. (03-13-2020)

Figure 4.4-7



Corps/RWQCB Jurisdictional Delineation Map

Lead Agency: City of Perris

Regional Water Quality Control Board Jurisdiction

The PVSD Channel and Tributary 1 have been determined to be Corps jurisdictional waters subject to regulation pursuant to Section 401 and 404 of the CWA and does not need to be addressed separately pursuant to Section 13260 of the CWC, the Porter-Cologne Act.

California Department of Fish and Wildlife Jurisdiction

CDFW jurisdiction within the study area associated with the PVSD Channel and Tributary 1 totals 8.48 acres, of which approximately 0.20 acre consists of vegetated riparian habitat and 8.28 acres are non-riparian streambed. A total of 3,491 linear feet of streambed are present within the Study Area, of which 271 linear feet are vegetated riparian and 3,220 linear feet are non-riparian streambed.

CDFW jurisdiction associated with the PVSD Channel totals 8.41 acres, of which approximately 0.20 acre consists of vegetated riparian habitat and 8.21 acres are non-riparian streambed. A total of 3,134 linear feet of streambed are present, of which 271 linear feet are vegetated riparian and 2,863 linear feet are non-riparian streambed. CDFW jurisdiction is extended to the top of the bank for the Channel. The boundaries of CDFW jurisdiction are depicted on Figure 4.4-8, CDFW Jurisdictional Delineation/MSHCP Riparian Riverine Map.

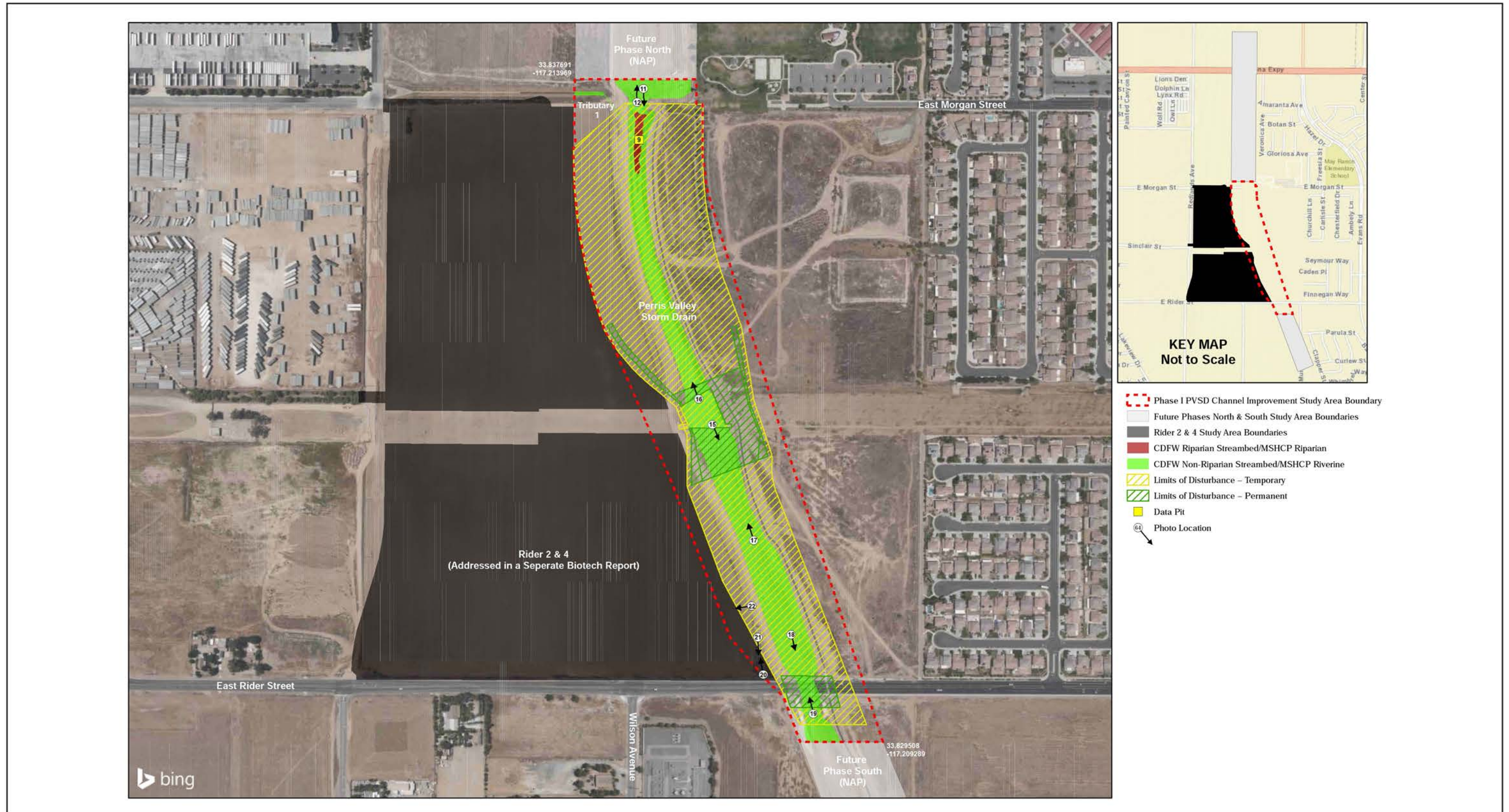
The segment of the PVSD Channel from Morgan Street to just south of East Rider Street contains a 0.20-acre patch of vegetated riparian habitat immediately south of Morgan Street which is by two storm drains located on both sides of the PVSD Channel.

CDFW jurisdiction associated with Tributary 1 totals 0.07 acre, none of which consists of riparian streambed and all of which is non-riparian streambed. A total of 357 linear feet of streambed are present. Tributary 1 is an offsite tributary located near the intersection of Morgan Street and Redlands Avenue. Tributary 1 is a man-made drainage feature which does not support vegetation.

MSHCP Riparian/Riverine Areas and Vernal Pools

Vegetation communities associated with riparian systems and vernal pools are depleted natural vegetation communities because they have declined throughout Southern California during past decades. In addition, they support a large variety of special-status wildlife species. Most species associated with Riparian/Riverine areas are covered species under the MSHCP (under Section 6.1.2 of MSHCP). The MSHCP has specific policies and procedures regarding the evaluation and conservation of Riparian/Riverine resources (including riparian vegetation) and vernal pools because it supports MSHCP covered species. Specifically, the MSHCP states that “Riparian/Riverine areas are natural 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.”

Thus, the MSHCP classification of Riparian/Riverine includes both riparian (depleted natural vegetation communities) as well as ephemeral drainages that are natural in origin but may lack riparian vegetation. For this analysis, all features that qualify as state streambeds are considered MSHCP Riparian/Riverine resources.



Source(s): Glenn Lukos Associates, Inc. (03-13-2020)

Figure 4.4-8



CDFW Jurisdictional Delineation/MSHCP Riparian Riverine Map

Lead Agency: City of Perris

MSHCP Riparian/Riverine jurisdiction in the Project study area occurs wholly within the PVSD Channel and is identical to that of CDFW jurisdiction (refer to Figure 4.4-8). MSHCP Riparian/Riverine areas total 8.48 acres, 0.20 acre of which consists of disturbed southern riparian scrub, 1.24 acres of which consists of developed land, 0.10 acre of which consists of ruderal (upland) vegetation, and 6.94 acres of which consists of ruderal (channel) vegetation. The PVSD Channel receives water input routinely and to a level supportive of riparian conditions. However, high-energy hydrological activity within the PVSD Channel combined with routine maintenance reduces the quality of this resource. Refer to the discussion of vegetation communities, above.

Wildlife Linkages/Corridors and Nursery Sites

Habitat linkages are areas which provide a communication between two or more other habitat areas which are often larger or superior in quality to the linkage. Such linkage sites can be quite small or constricted, but may can be vital to the long-term health of connected habitats. Linkage values are often addressed in terms of "gene flow" between populations, with movement taking potentially many generations.

Corridors are similar to linkages but provide specific opportunities for individual animals to disperse or migrate between areas, generally extensive but otherwise partially or wholly separated regions. Adequate cover and tolerably low levels of disturbance are common requirements for corridors. Habitat in corridors may be quite different than that in the connected areas, but if used by the wildlife species of interest, the corridor will still function as desired. The Project study area is not identified by the MSHCP as occurring within a linkage or corridor. In addition, the Project study area does not contain the structural topography and vegetative cover that facilitate regional wildlife movement.

Wildlife nurseries are sites where wildlife concentrate for hatching and/or raising young, such as rookeries, spawning areas, and bat colonies. Nurseries can be important to both special-status species as well as commonly occurring species. The Project study area does not support a nursery site due to a lack of habitat.

The PVSD Channel could provide wildlife movement habitat but lacks the typical structure needed such as riparian trees and/or shrubs which provide cover and protection to animals as they move through an area. There are no MSHCP Cores or Linkages adjacent to or within the study. The PVSD Channel is owned by the RCFC&WCD and is mapped as PQP Conserved Lands under the MSHCP.

4.4.2 EXISTING POLICIES AND REGULATIONS

Section 4.3, Biological Resources, of the PVCCSP EIR includes a discussion of regulations pertaining to biological resources that are applicable to the Project area. These regulations are summarized below and further detailed in the biological technical reports included in Appendix C.

Endangered Species Acts

Federal Endangered Specific Act

The Federal Endangered Species Act (ESA) prohibits "take" (harm or harassment [including to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct]

of individuals of a protected species and, under certain circumstances, the destruction of habitat) of a Federally listed Endangered or Threatened species and will require incidental take permits or authorization. Individual projects within the PVCC area are required to avoid known occurrences of listed plants and habitat for listed wildlife species or otherwise mitigate potential impacts to these species through the requirements of Section 6 of the (MSHCP).

California Endangered Species Act

The California Endangered Species Act (Fish and Game Code 2050, et seq.) (CESA) establishes that it is the policy of the state to conserve, protect, restore, and enhance Threatened or Endangered species and their habitats. CESA mandates that state agencies should not approve projects which would jeopardize the continued existence of threatened or endangered species if reasonable and prudent alternatives are available that would avoid jeopardy. CESA requires state lead agencies to consult with the CDFW during the CEQA process to avoid jeopardy to threatened or endangered species.

Article 3, Sections 2080 through 2085, of the CESA, addresses the taking of threatened, endangered, or candidate species by stating “No person shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided.” Under the CESA, “take” is defined as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” Exceptions authorized by the state to allow “take” require permits or memoranda of understanding and can be authorized for endangered species, threatened species, or candidate species for scientific, educational, or management purposes and for take incidental to otherwise lawful activities. Sections 1901 and 1913 of the California Fish and Game Code provide that notification is required prior to disturbance.

Migratory Bird Treaty Act

The Federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Sections 3503, 3503.5, and 3800 prohibit the take, possession, or destruction of any birds, their nests, or eggs. Much of the PVCCSP area (exceptions include portions of the "developed" areas) provides foraging habitat for many raptor species, including special-status raptors. The loss of raptor habitat is covered and mitigated for through participation with the MSHCP. Direct impacts to raptors (and other migratory birds), including their active nests, are prohibited through the MBTA and California Fish and Game Code. As such, vegetation removals should be conducted outside of the nesting season, but if not feasible then nesting bird surveys should be conducted prior to any removals.

Jurisdictional Waters

Army Corps of Engineers

Pursuant to Section 404 of the Clean Water Act, the Corps regulates discharges of dredged and/or fill material into WoUS, which are defined in the Corps regulations at 33 C.F.R. Part 328.3(a)¹. In the absence of wetlands, the limits of Corps jurisdiction in non-tidal waters, such as intermittent streams, extend to the OHWM which is defined at 33 CFR 328.3(e) as:

...that line on the shore established by the fluctuation of water and indicated by physical characteristics such as clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.

The term “wetlands” (a subset of “waters of the United States”) is defined at 33 CFR 328.3(b) as “those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support...a prevalence of vegetation typically adapted for life in saturated soil conditions.” In 1987 the Corps published a manual to guide its field personnel in determining jurisdictional wetland boundaries. The methodology set forth in the 1987 Wetland Delineation Manual and the Arid West Supplement generally require that, in order to be considered a wetland, the vegetation, soils, and hydrology of an area exhibit at least minimal hydric characteristics. While the manual and Supplement provide great detail in methodology and allow for varying special conditions, a wetland should normally meet each of the following three criteria:

- more than 50 percent of the dominant plant species at the site must be typical of wetlands (i.e., rated as facultative or wetter in the National List of Plant Species that Occur in Wetlands);
- soils must exhibit physical and/or chemical characteristics indicative of permanent or periodic saturation (e.g., a gleyed color, or mottles with a matrix of low chroma indicating a relatively consistent fluctuation between aerobic and anaerobic conditions); and
- Whereas the 1987 Manual requires that hydrologic characteristics indicate that the ground is saturated to within 12 inches of the surface for at least five percent of the growing season during a normal rainfall year, the Arid West Supplement does not include a quantitative criteria with the exception for areas with “problematic hydrophytic vegetation”, which require a minimum of 14 days of ponding to be considered a wetland.

¹ This definition supersedes the “Clean Water Rule: Definition of ‘Waters of the United States’; Final Rule,” 80 Federal Register 124 (June 29, 2015), pp. 37054-37127, which was made effective August 28, 2015 and recently repealed on September 12, 2019. As of the effective date of this repeal, the agencies will administer the regulations promulgated in 1986 and 1988 in portions of 33 CFR part 328 and 40 CFR parts 110, 112, 116, 117, 122, 230, 232, 300, 302, and 401 and will continue to interpret the statutory term “Waters of the United States” to mean the waters covered by those regulations consistent with Supreme Court decisions and longstanding practice, as informed by applicable regulatory guidance. Regardless, the repeal of the “2015 Rule” does not affect Corps jurisdiction associated with the Project (GLA, 2019).

On January 9, 2001 and June 5, 2007, the Supreme Court of the United States issued two rulings (*Solid Waste Agency of Northern Cook County v. United States Army Corps of Engineers, et al* [SWANCC] and *Rapanos v. United States and Carabell v. United States* [Rapanos], respectively). The first case reiterated that “isolated” waters (those with no interstate commerce connection) are not subject to federal jurisdiction under Section 404 of the Clean Water Act. The second case determined (in a plurality vote) that a water must have a nexus with a “traditionally navigable water (an undefined term) to be subject to federal jurisdiction under Section 404 of the Clean Water Act. The Corps and EPA continue to grapple with providing clear guidance on these two decisions and continue to propose and/or issue guidance. In the meantime, applicants who believe they have waters that would be exempt from federal jurisdiction pursuant to these two rulings must go through a formal process with the Corps and EPA to obtain concurrence.

Regional Water Quality Control Board

Section 401 of the CWA requires any applicant for a Section 404 permit to obtain certification from the State that the discharge (and the operation of the facility being constructed) will comply with the applicable effluent limitation and water quality standards. In California, this Section 401 certification is obtained from the RWQCB. The Corps, by law, cannot issue a Section 404 permit until a 401 certification is issued or waived.

Subsequent to the SWANCC decision, the Chief Counsel for the State Water Resources Control Board (SWRCB) issued a memorandum that addressed the effects of the SWANCC decision on the Section 401 Water Quality Certification Program. In this memorandum the SWRCB’s Chief Counsel has made the clear assumption that fill material to be discharged into isolated waters of the United States is to be considered equivalent to “waste” and therefore subject to the authority of the Porter Cologne Water Quality Act.

California Department of Fish and Wildlife

Pursuant to Division 2, Chapter 6, Sections 1600-1617 of the California Fish and Game Code, the CDFW regulates all diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake, which supports fish or wildlife. CDFW defines a stream (including creeks and rivers) as “a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having surface or subsurface flow that supports or has supported riparian vegetation.” CDFW’s definition of “lake” includes “natural lakes or man-made reservoirs.” CDFW also defines a stream as “a body of water that flows, or has flowed, over a given course during the historic hydrologic regime, and where the width of its course can reasonably be identified by physical or biological indicators.”

It is important to note that the Fish and Game Code defines fish and wildlife to include: all wild animals, birds, plants, fish, amphibians, invertebrates, reptiles, and related ecological communities including the habitat upon which they depend for continued viability (FGC Division 5, Chapter 1, section 45 and Division 2, Chapter 1 section 711.2(a) respectively). Furthermore, Division 2, Chapter 5, Article 6, Section 1600 et seq. of the California Fish and Game Code does not limit jurisdiction to areas defined by specific flow events, seasonal changes in water flow, or presence/absence of vegetation types or communities.

Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)

The Western Riverside County MSHCP serves as a comprehensive multi-jurisdictional Habitat Conservation Plan (HCP), pursuant to Section (a)(1)(B) of the Federal ESA of 1973 as well as a Natural Communities Conservation Plan (NCCP) under the State NCCP Act of 2001.

The Western Riverside County MSHCP was adopted on June 17, 2003, and an Implementing Agreement (IA) was executed between the federal and state wildlife agencies and participating entities. The MSHCP is a comprehensive habitat conservation-planning program for western Riverside County. The intent of the MSHCP is to preserve native vegetation and meet the habitat needs of multiple species, rather than focusing preservation efforts on one species at a time. As such, the MSHCP is intended to streamline review of individual projects with respect to the species and habitats addressed in the MSHCP, and to provide for an overall Conservation Area that would be of greater benefit to biological resources than would result from a piecemeal regulatory approach. The MSHCP provides coverage (including take authorization for listed species) for special-status plant and animal species, as well as mitigation for impacts to sensitive species pursuant to Section 10(a) of the FESA.

Through agreements with the USFWS and the CDFW, the MSHCP designates 146 special-status animal and plant species that receive some level of coverage under the plan. Of the 146 "Covered Species" designated under the MSHCP, most of these species have no additional survey/conservation requirements. In addition, through project participation with the MSHCP, the MSHCP provides mitigation for project-specific impacts to Covered Species so that the impacts would be reduced to below a level of significance pursuant to CEQA. Project-specific survey requirements exist for species designated as "Covered Species not yet adequately conserved." These include Narrow Endemic Plant Species (MSHCP Volume I, Section 6.1.3), as identified by the Narrow Endemic Plant Species Survey Areas (NEPSSA); Criteria Area Plant Species (MSHCP Volume I, Section 6.3.2) identified by the Criteria Area Plant Species Survey Areas (CAPSSA); animals species (burrowing owl, mammals, amphibians) identified by survey areas (MSHCP Volume I, Section 6.3.2); and species associated with Riparian/Riverine areas and vernal pool habitats (i.e., least Bell's vireo, southwestern willow flycatcher, western yellow-billed cuckoo, and three species of listed fairy shrimp) (MSHCP Volume I, Section 6.1.2). An additional 28 species (MSHCP Volume I, Table 9.3) not yet adequately conserved have species-specific objectives in order for the species to become adequately conserved. However, these species do not have project-specific survey requirements.

For projects that have a federal nexus such as through federal CWA Section 404 permitting, take authorization for federally listed covered species would occur under Section 7 (not Section 10) of FESA and that USFWS would provide a MSHCP consistency review of the proposed Project, resulting in a biological opinion. The biological opinion would require no more compensation than what is required to be consistent with the MSHCP.

The goal of the MSHCP is to have a total Conservation Area in excess of 500,000 acres, including approximately 347,000 acres on existing PQP Lands, and approximately 153,000 acres of Additional Reserve Lands targeted within the MSHCP Criteria Area. The MSHCP is divided into 16 separate Area Plans, each with its own conservation goals and objectives. Within each Area Plan, the Criteria Area is divided into Subunits, and further divided into Criteria Cells and Cell Groups (a group of criteria cells). Each Cell Group and ungrouped, independent Cell has designated "criteria" for the purpose of targeting additional conservation lands for acquisition. Projects located within the Criteria Area are subject to the

Habitat Evaluation and Acquisition Negotiation Strategy (HANS) process to determine if lands are targeted for inclusion in the MSHCP Reserve. In addition, all Projects located within the Criteria Area are subject to the Joint Project Review (JPR) process, where the Project is reviewed by the Regional Conservation Authority (RCA) to determine overall compliance/consistency with the biological requirements of the MSHCP.

Stephens' Kangaroo Rat Habitat Conservation Plan

The Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) was prepared under the direction of the Riverside County Habitat Conservation Agency (RCHCA) Board of Directors, in consultation with USFWS and CDFW. The County of Riverside is a member agency of the RCHCA. The 30-year SKR HCP was designed to acquire and permanently conserve, maintain and fund the conservation, preservation, restoration, and enhancement of Stephens' kangaroo rat-occupied habitat. The SKR HCP covers approximately 534,000 acres within the member jurisdictions and includes an estimated 30,000 acres of occupied Stephens' kangaroo rat habitat. The SKR HCP requires members to preserve and manage 15,000 acres of occupied habitat in seven Core Reserves encompassing over 41,000 acres.

On May 3, 1996, the USFWS issued a permit to the Riverside County Habitat Conservation Agency to incidentally take the federally endangered Stephens' kangaroo rat. Similarly, the CDFW issued a California Endangered Species Act Management Authorization for Implementation of the Stephens' kangaroo rat on May 6, 1996. To date, more than \$50 million has been dedicated to the establishment and management of a system of regional preserves designed to ensure the survival of SKR in the plan area. This effort resulted in the permanent conservation of approximately 50 percent of the SKR-occupied habitat remaining in the HCP area. Through direct funding and in-kind contributions, SKR habitat in the regional reserve system is managed to ensure its continuing ability to support the species. Core reserves were deemed complete in December of 2003.

Local

City of Perris General Plan Policies

The Conservation Element of the City's General Plan identifies goals and policies related to biological resources. The goals and policies applicable to the proposed Project and a discussion of the Project's consistency is provided in Table 4.11-2, City of Perris General Plan Consistency Analysis, in Section 4.11, Land Use and Planning, of this EIR.

4.4.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on biological resources if it will:

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

- b. Have a substantially 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 Wildlife or U.S. Fish and Wildlife Service.
- c. Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- d. Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident 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 Conservation Community Plan, or other approved local, regional, or state habitat conservation plan.

4.4.4 ENVIRONMENTAL IMPACTS

Applicable PVCC Standards and Guidelines and Mitigation Measures

There are no Perris PVCCSP Standards or Guidelines applicable to the analysis of biological resources for the Project. The PVCCSP EIR includes MMs for potential impacts to biological resources. These MMs are incorporated as part of the proposed Project and are assumed in the analysis presented in this section.

Mitigation Measures

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

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

California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.

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

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

If burrowing owls occupy any implementing project site and cannot be avoided, active or passive relocation shall be used to exclude owls from their burrows, as agreed to by the City of Perris Planning Division and the CDFG. Relocation shall be conducted outside the breeding season or once the young are able to leave the nest and fly. Passive relocation is the exclusion of owls from their burrows (outside the breeding season or once the young are able to leave the nest and fly) by installing 1-way doors in burrow entrances. These 1-way doors allow the owl to exit the burrow, but not enter it. These doors shall be left in place 48 hours to ensure owls have left the burrow. Artificial burrows shall be provided nearby. The implementing project area shall be monitored daily for 1 week to confirm owl use of burrows before excavating burrows in the impact area. Burrows shall be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible pipe shall be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow. The CDFG shall be consulted prior to any active relocation to determine acceptable receiving sites available where this species has a greater chance of successful long-term relocation. If avoidance is infeasible, then a DBESP will be required, including associated relocation of burrowing owls. If conservation is not required, then owl relocation will still be required following accepted protocols. Take of active nests will be avoided, so it is strongly recommended that any relocation occur outside of the nesting season.

MM Bio 3 *Project-specific delineations will be required to determine the limits of ACOE, RWQCB, and CDFG jurisdiction for implementing projects that may contain jurisdictional features. Impacts to jurisdictional waters will require authorization by the corresponding regulatory agency. If impacts are indicated in an implementing project-specific delineation, prior to the issuance of a grading permit, such implementing projects will obtain the necessary authorizations from the regulatory agencies for proposed impacts to jurisdictional waters. Authorizations may include, but are not limited to, a Section 404 permit from the ACOE, a Section 401*

Water Quality Certification from the RWQCB, and a Section 1602 Streambed Alteration Agreement from CDFG.

MM Bio 4 *Project-specific mapping of riparian and unvegetated riverine features will be required for implementing projects pursuant to Section 6.1.2 of the MSHCP. For areas not excluded as artificially created, the MSHCP requires 100 percent avoidance of riparian/riverine areas. If for any implementing project avoidance is not feasible, then such implementing projects will require the approval of a DBESP including appropriate mitigation to offset the loss of functions and values as they pertain to the MSHCP covered species. Riparian vegetation will also need to be evaluated for the least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo.*

Impact Analysis

Threshold a Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?

The following discussion examines the potential impacts to candidate, sensitive, or special status plant and wildlife species that would occur as a result of Project implementation. Impacts can occur in two forms, direct and indirect. Direct impacts are considered to be those that involve the loss, modification or disturbance of plant communities, which in turn, directly affect the flora and fauna of those habitats. Direct impacts also include the destruction of individual plants or animals, which may also directly affect regional population numbers of a species or result in the physical isolation of populations thereby reducing genetic diversity and population stability. Indirect impacts pertain to those impacts that result in a change to the physical environment, but which is not immediately related to a project. Indirect (or secondary) impacts are those that are reasonably foreseeable and caused by a project but occur at a different time or place.

Impacts to Natural Vegetation

Implementation of proposed development at the Rider 2 and Rider 4 sites and site-adjacent off-site improvement areas would result in direct impacts to approximately 69.5 acres of disturbed habitat types, including up to 0.80 acre of disturbed/developed land and up to 68.7 acres of ruderal vegetation. These areas do not support native or natural vegetation communities; therefore, no direct impacts to native or natural vegetation communities, including special-status vegetation communities, would result from development of the Rider 2 and Rider 4 sites and site-adjacent off-site improvement areas.

Table 4.4-1, Summary of Impacts to Vegetation/Land Use Types for the PVSD Channel Improvements, provides a summary of vegetation types and land uses that would be temporarily (during construction) and permanently impacted by implementation of the proposed PVSD Channel improvements and associated Rider Street bridge improvements. As shown these improvements would temporarily impact approximately 0.20 acre of disturbed southern riparian scrub, 4.49 acres of disturbed/developed land, 15.80 acres of ruderal (upland) vegetation, and 5.58 acres of ruderal (channel) vegetation. Approximately 1.49 acres of disturbed/developed land, 1.0 acre of ruderal (upland) vegetation, and 1.12 acres of ruderal (channel vegetation) would be removed/impacted.

Table 4.4-1 Summary of Impacts to Vegetation/Land Use Types for the PVSD Channel Improvements

Vegetation Type	Area of Avoidance within Project Study Area	Area of Temporary Impacts within Project Study Area (acres)	Area of Permanent Impacts within Project Study Area (acres)
Developed	1.30	4.49	1.49
Ruderal (Upland)	7.19	15.80	1.00
Ruderal (Channel)	0.99	5.58	1.12
Disturbed Southern Riparian Scrub	0.00	0.20	0.00
Total^a	9.48	26.07	3.61^b

^a Totals may not equal sum of parts due to rounding error.
^b For purposes of this analysis, vegetation impacts associated with the proposed Rider Street bridge span portion of the Project are being considered as permanent and may be decreased upon completion of the final bridge span design.
 Source: (GLA, 2020)

Impacts to disturbed/developed land would be a less than significant impact under CEQA because this land does not support vegetation. Impacts to ruderal (upland/channel) vegetation would be a less than significant impact under CEQA as the impact area is heavily disturbed and routinely maintained, and the ruderal vegetation is composed of non-native plant species, some of which are classified as invasive.

The temporary impact to the 0.20 acre of disturbed southern riparian scrub within the PVSD Channel would be a potentially significant impact under CEQA because the riparian area supports important hydrological functions and values. However, the riparian area is not expected to support high value biological functions and values due to high cover of non-native plant species and the routine mowing which does not allow complex vegetation structure to occur and persist. Furthermore, these proposed impacts would only be temporary. Measures to ensure consistency with the MSHCP and to ensure any temporary impacts that would occur from the Project are reduced to a less than significant level are discussed under Threshold f of this section.

The Project would not impact lands designated as critical habitat by the USFWS, as none is present within the Project area.

Direct Impacts to Special-Status Plant Species

The Project would not result in any impacts to special-status plants as no special-status plant species are present within the Project area (Rider 2 and 4 building sites, PVSD Channel Improvements, and site-adjacent off-site improvement areas). The Project area is located within the NEPSSA and CAPSSA; however, the it is not expected to support NEPSSA or CAPSSA, or other special-status plant species, due to the absence of the necessary vegetation communities, hydrology, and/or soils; as well as the ongoing disturbance levels to the soils. Therefore, no impacts would result and no mitigation is required.

Direct Impacts to Special-Status Wildlife Species

Federal and/or State Listed Animals

The Project area is located within the SKR HCP; SKR is listed as Endangered by the federal government and listed as Threatened by the state of California. SKR are not expected to occur in the Rider 2 and

Rider 4 building sites or site-adjacent improvement areas due to a lack of suitable habitat in the ruderal uplands. While this species has a high tolerance for routine disturbances, the substrate of this area is heavily tilled and disked such that this species is not expected to occur. SKR has a very low potential to support foraging by SKR in the ruderal uplands located within the PVSD Channel improvement area.

Implementation of the Rider 2 and Rider 4 building sites and site-adjacent improvement areas would permanently remove approximately 68.71 acres of potential low-quality habitat in the form of ruderal vegetation. The PVSD Channel improvements would temporarily disturb approximately 15.8 acres of potential habitat and permanently remove approximately 1.0 acre of potential habitat. The loss of SKR potential habitat would be a potentially significant impact under CEQA. However, the Project occurs within the SKR Habitat Conservation Plan and with mandatory fee payment to this HCP, this potentially significant impact would be reduced to a less than significant level and fully mitigated.

Non-Listed Special-Status Animals

No special-status species were detected within the Project area. However, implementation of the Project would result in the permanent or temporary loss of marginal foraging habitat for golden eagle, loggerhead shrike, northern harrier, San Diego black-tailed jackrabbit. Construction at the Rider 2 and Rider 4 building sites and site-adjacent improvement areas would permanently remove up to approximately 68.71 acres of marginal foraging habitat for these species. The PVSD Channel improvements would temporarily impact approximately 21.38 acres of marginal foraging habitat for these species, and permanently impact approximately 2.12 acres. However, the impacted lands are routinely disked and support ruderal non-native vegetation. Therefore, the Project's impacts would be less than significant due to the heavily disturbed condition of the property and the relatively low level of sensitivity of the species. Additionally, all of these species are Covered Species under the MSHCP, with any potential impacts mitigated through compliance with the MSHCP.

As mentioned in Subsection 4.4.1, a single burrowing owl was observed approximately 88 feet north of the Rider 4 site during a focused survey. However, no burrowing owl individuals or signs of burrowing owl use were observed within the Project impact area during surveys conducted by GLA. based on this, the Project would not impact this species. However, the Project area has the potential to support burrowing owls in the future based on the presence of foraging habitat and the mercurial nature of burrowing owl. If burrowing owls are present within the Project impact area at the time grading activities commence, impacts to the species would be significant and mitigation would be required. The MSHCP typically requires a preconstruction survey for burrowing owls to ensure that projects would not result in the direct harm of owls. Mitigation measure MM Bio 2 from the PVCCSP EIR is incorporated into the Project and would ensure that required pre-construction surveys are conducted for the burrowing owl to determine the presence or absence of the species within the Project impact area. If present, the mitigation measure provides performance criteria that requires avoidance and/or relocation of burrowing owls in accordance with CDFW protocol. With implementation of the required mitigation, potential direct impacts to the burrowing owl would be reduced to a less than significant level.

Impacts to Raptors

Raptors (birds of prey) include owls, hawks, eagles, and falcons. Common species of raptors (e.g. Red-tailed hawk) as well as less common special-status species (i.e. northern harrier, golden eagle) have potential to forage in the Project area. Construction at the Rider 2 and Rider 4 building sites and site-

adjacent improvement areas would impact approximately 68.71 acres of potential foraging habitat (ruderal vegetation). The PVSD Channel improvements would temporarily impact 21.38 acres and permanently impact 2.12 acres of potential foraging habitat (ruderal vegetation). The Project area does not support potential nesting habitat for raptors. The temporary and permanent loss of potential foraging habitat would not be a significant impact under CEQA given the amount of potential habitat proposed for removal and the level of ongoing disturbances that reduce the prey base. In addition, those raptors with special-status and potential to be present are fully covered by the MSHCP and thus, compliance with the MSHCP would mitigate for any potential significant impacts to these species.

Impacts to Nesting Birds

The Project has the potential to impact active bird nests if vegetation is removed during the nesting season (February 1 to August 31). Impacts to nesting birds are prohibited by the California Fish and Game Code. Mitigation measure MM Bio 1 from the PVCCSP EIR is incorporated into the Project and would ensure that pre-construction nesting bird surveys are conducted; this measure also identifies actions to be taken if nesting birds are present.

Although impacts to native birds are prohibited by the California Fish and Game Code, potential impacts to native birds by the Project would not be a significant impact under CEQA. The native birds with potential to nest in the Project area would be those that are extremely common to the region and highly adapted to human landscapes (e.g., mourning dove, killdeer). The number of individuals potentially affected by the Project would not significantly affect regional, let alone local populations of such species.

Indirect Impacts to Special-Status Biological Resources

Development projects located adjacent to natural open spaces have the potential to result in indirect effects to biological resources such as water quality impacts from associated drainage into adjacent open space/downstream aquatic resources, lighting effects, noise effects, invasive plant species from landscaping, and effects from human access into adjacent open space, such as recreational activities (including off-road vehicles and hiking), pets, dumping, etc. Temporary, indirect effects could also occur as a result of construction-related activities.

During the widening of the PVSD Channel, which is classified as Public/Quasi-Public (PQP) Conserved lands by the MSHCP, there would be potential for significant impacts to occur to wetlands and riparian habitat through degraded water quality, introduction of invasive plant species, dust, and noise. The Rider 2 and Rider 4 building site are adjacent to PVSD Channel resulting in the potential for indirect impacts. Therefore, implementation of the Project is required to comply with the MSHCP Urban/Wildland Interface Guidelines (MSHCP Volume I, Section 6.1.4), as further discussed under Threshold f, below. The Project Applicant would implement measures consistent with these MSHCP Guidelines to address the following issue areas: drainage, toxics, lighting, noise, invasive species, barrier, and grading/land development. With implementation of these measures above, the Project would result in a less than significant indirect impacts to special-status biological resources.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

- Threshold b** Would the Project have a substantially 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 Wildlife or U.S. Fish and Wildlife Service?
- Threshold c** Would the Project have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The Rider 2 and 4 sites and site-adjacent improvement areas would not result in impacts to Corps, RWQCB, or CDFW jurisdictional waters or wetlands as there are no jurisdictional features present within these areas. Further, the PVSD Channel improvement areas do not contain federally protected or other jurisdictional wetlands.

However as shown on Figure 4.4-7 and Figure 4.4-8, the PVSD Channel improvement would impact jurisdictional water and riverine/riparian areas. The PVSD Channel improvements would temporarily impact 3.37 acres and 2,660 linear feet of WoUS subject to the jurisdiction of the Corps and the RWQCB (all non-wetland waters), and 6.38 acres and 2,660 linear feet of streambed subject to the jurisdiction of CDFW (0.20 acre and 264 linear feet of which consist of riparian streambed). The PVSD Channel improvements would also permanently impact 0.98 acre and 415 linear feet of WoUS subject to the jurisdiction of the Corps and the Regional Board (all non-wetland waters), and 1.14 acres and 415 linear feet of streambed subject to the jurisdiction of CDFW (all non-riparian). Refer to Table 4.4-2, below, for a summary of impacts by jurisdiction and feature. The proposed impacts would be a potentially significant impact under CEQA because these resources are riparian and/or potentially provide important hydrological functions and values. However, because of the routine mechanical disturbance to the PVSD Channel, which supports non-native plant species and eliminates growth of complex vegetation structure, the hydrological functions and values have been reduced. Furthermore, a majority of these impacts are only temporary.

The PVSD Channel improvements would result in temporary impacts to MSHCP Riparian/Riverine vegetation totaling approximately 0.20 acre (refer to Figure 4.4-8). MSHCP Riparian vegetation within the Project impact area includes the approximately 0.20 acre of disturbed southern riparian scrub. The PVSD Channel improvements would also result in temporary impacts to approximately 6.18 acres of MSHCP Riverine resources and permanent impacts to approximately 1.14 acres of MSHCP Riverine resources within the Project impact area, which includes ruderal upland, ruderal channel, and developed areas. These MSHCP Riparian/Riverine resources may provide potentially important hydrological functions and values and the proposed impacts would be potentially significant under CEQA. However, these vegetation types are not expected to provide important biological functions and values because of the routine mechanical disturbance to the PVSD, which supports non-native plant species and eliminates growth of complex vegetation structure. Furthermore, a majority of these impacts are only temporary. Refer to Table 4.4-3 below for a summary of impacts to MSHCP Riparian/Riverine resources.

Table 4.4-2 Summary of Proposed Impacts to Corps, RWQCB, and CDFW Jurisdiction

Drainage Feature	Impact Type	Corps/Regional Board			CDFW			Length
		Wetland (acres)	Non-wetland Waters (acres)	Total (acres)	Vegetated Streambed (acres)	Non-Riparian Streambed (acres)	Total (acres)	Total Streambed (linear feet)
Tributary 1	Permanent	0.0	0.0	0.0	0.0	0.0	0.0	0
	Temporary	0.0	0.01	0.01	0.0	0.01	0.01	131
PVSD Channel	Permanent ^b	0.0	0.98	0.98	0.0	1.14	1.14	415
	Temporary	0.0	3.36	3.36	0.20	6.17	6.37	2,529
Totals^a		0.0	4.36	4.36	0.20	7.31	7.51	3,075

a. Totals may not equal sum of parts due to rounding error.
 b. For purposes of this analysis, impacts to jurisdiction associated with the proposed Rider Street bridge span portion of the Project are being considered as permanent and may decreased upon completion of the final bridge span design.
 Source: (GLA, 2020)

Table 4.4-3 Summary of Proposed Impacts to MSHCP Riparian/Riverine Resources

Drainage Feature	Impact Type	Riverine Streambed	Riparian Streambed	Total (acre)	Length (Linear Feet)
Tributary 1	Permanent	0.0	0.0	0.0	0.0
	Temporary	0.01	0.0	0.01	131
Perris Valley Storm Drain	Permanent ^b	1.14	0.0	1.14	415
	Temporary	6.17	0.20	6.37	2,529
Totals^a		7.31	0.20	7.51	3,075

a. totals may not equal sum of parts due to rounding error.
 b. For purposes of this report, impacts to jurisdiction associated with the proposed Rider Street bridge span portion of the Project are being considered as permanent and may decreased upon completion of the final bridge span design.
 Source: (GLA, 2020)

As identified in PVCCSP EIR mitigation measure Bio 3, impacts to Corps/RWQCB jurisdiction would trigger the need for a CWA Section 404 permit and a Section 401 Water Quality Certification. Impacts to CDFW jurisdiction would require a Streambed Alteration Agreement under Section 1602 of the Fish and Game Code. The PVSD Channel improvements would involve widening of the Channel and would increase the amount of Corps/RWQCB and CDFW jurisdiction onsite beyond pre-project conditions by up to 20 acres²; therefore, the Project is self-mitigating and impacts would be reduced to a less than significant level.

² This estimate is approximate and excludes proposed permanent structures.

The PVSD Channel improvements would temporarily impact approximately 0.20 acre of MSHCP Riparian resources consisting of disturbed southern riparian scrub. The Project would also temporarily impact approximately 6.18 acres of MSHCP Riverine resources and permanently impact up to approximately 1.14 acres of MSHCP Riverine resources, consisting of ruderal channel, ruderal upland, and developed areas³. As identified in PVCCSP EIR mitigation measure Bio 4, temporary and permanent impacts to MSHCP Riparian/Riverine resources triggers the requirement under the MSHCP that a Determination of Biologically Equivalent or Superior Preservation (DBESP) be drafted and approved by the City. The DBESP may be approved after a 60-day review and response afforded to the Wildlife Agencies. The DBESP details the type of resource proposed for impact, why avoidance was not feasible, and the compensation provided to ensure biologically equivalent or superior preservation. Compensation that will be presented in the DBESP will be the same as what is proposed for CDFW riparian mitigation; because the PVSD Channel improvements consist of widening the existing onsite portion of the PVSD Channel, the Project is self-mitigating as it would increase the amount of onsite jurisdictional waters beyond pre-Project conditions by up to 20 acres⁴.

Additionally, as further discussion under Threshold f, below, orange silt fencing would be placed to demarcate the limits of disturbance in the PVSD Channel. Its placement would be overseen by a biological monitor and all preliminary vegetation removal and initial grading would be monitored by a biologist to ensure no encroachment beyond the limits of disturbance in the PVSD Channel would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

Threshold d Would the Project interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The Project area does not contain natural, surface drainage or ponding features, and there are no water bodies on or adjacent to the Project impact area that could support fish. Therefore, there is no potential for the Project to interfere with the movement of native resident migratory fish. Further, as discussed previously in Section 4.4.1, there is no potential for wildlife nurseries to be present within the Project area. As further discussed in Section 4.41, the PVSD Channel could provide wildlife movement habitat but lacks the typical structure needed such as riparian trees and/or shrubs which provide cover and protection to animals as they move through an area. In addition, the Rider 2 and Rider 4 building site and site-adjacent improvement areas do not contain the structural topography and vegetative cover that facilitate regional wildlife movement. There are also no MSHCP Cores or Linkages adjacent to or within the Project area. However, during construction activities, wildlife may temporarily avoid use of the PVSD Channel.

³This report analyzes the maximum amount of potential permanent impact to the PVSD Channel associated with the Rider Street bridge span portion of the Project. It is expected that impacts to Corps, Regional Board, and CDFW jurisdiction will be decreased upon completion of the final bridge span design.

⁴ This estimate is approximate and excludes proposed permanent structures.

After construction, any potential wildlife movement that does occur is expected to continue. The PVSD Channel is not expected to support regional movement due to the routine maintenance that occurs that eliminates shrub/tree cover that is needed by regionally moving wildlife. Any potential impacts to wildlife movement would be less than significant under CEQA. In addition, any potential impacts to wildlife movement would be mitigated by the MSHCP. This impact is less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

Threshold e Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

As previously discussed, the Project area is located within the Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP); however, no SKR was observed within the Project impact area and due to lack of suitable habitat, no SKR is expected to occur within the Project impact area. Furthermore, the Project Applicant is required to contribute a local development impact and mitigation fee, which requires a fee payment to assist the City in implementing the SKR HCP. With mandatory compliance with standard regulatory requirements (i.e., development impact and mitigation fee payment), the proposed Project would not conflict with any City policies or ordinances related to the protection of the SKR and impacts would be less than significant.

The City of Perris Municipal Code also contains provisions for the collection of mitigation fees to further the implementation of the Western Riverside County MSHCP (refer to Title 3, Chapter 3.48 of the Municipal Code). The Project Applicant is required to contribute a local mitigation fee, which requires a fee payment to assist the City in implementing the Western Riverside County MSHCP reserve system (including the acquisition, management, and long-term maintenance of sensitive habitat areas). With mandatory compliance with standard regulatory requirements (i.e., mitigation fee payment), the Project would not conflict with any City policies or ordinances related to the mitigation fee program associated with Western Riverside County MSHCP and impacts would be less than significant.

The City of Perris does not have any additional policies or ordinances in place to protect biological resources that are applicable to the Project.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

Threshold f Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan?

The following analysis evaluates the Project's compliance with the Western Riverside County MSHCP's Reserve Assembly Requirements as well as other applicable MSHCP requirements pursuant to the following sections of the MSHCP: Section 6.1.2, Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools; Section 6.1.3, Protection of Narrow Endemic Plant Species; Section 6.1.4, Guidelines Pertaining to the Urban/Wildland Interface; and Section 6.3.2, Additional Survey Needs and Procedures.

Project Relation to Reserve Assembly

The Project area does not occur within a MSHCP Criteria Area nor is it located within any Criteria Cell. As such, the Project is not required to set aside conservation lands pursuant to the MSHCP, and the Project is not subject to the MSHCP's Habitat Evaluation and Acquisition Negotiation Strategy (HANS) process nor Joint Project Review (JPR). Accordingly, the Project would not conflict with the MSHCP Reserve Assembly requirements and no impact would occur.

Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools

The MSHCP requires that an assessment be completed if impacts to riparian/riverine areas and vernal pools could occur from construction in support of the Project. According to the MSHCP, the documentation for the assessment shall include mapping and a description of the functions and values of the mapped areas with respect to the species listed in Section 6.1.2 of the MSHCP, Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools. As discussed under Thresholds b and c, above, implementation of the Rider 2 and Rider 4 buildings and associated site-adjacent improvement areas would not impact MSHCP riparian/riverine areas. However, the proposed PVSD Channel improvements would temporarily impact 0.20 acre of MSHCP riparian resources consisting of disturbed southern riparian scrub, and 6.18 acres of MSHCP riverine resources. Additionally, up to 1.14 acres of MSHCP Riverine resources would be permanently impacted, consisting of ruderal channel, ruderal upland, and developed areas.

As discussed under Thresholds b and c, above, a DBESP will be required, after which, the Project would be consistent with Volume I, Section 6.1.2 of the MSHCP. Compensation that would be presented in the DBESP would be the Project itself. Because the Project consists of widening the existing onsite portion of the PVSD Channel, the Project is self-mitigating as it would increase the amount of onsite riverine areas beyond pre-Project conditions by approximately 20 acres. Following the completion of construction activities, the area of disturbance would be seeded with a native seed mix to prevent non-native habitat from re-establishing in the channel. No vernal pools are present within the Project area; therefore, no impact to vernal pools would occur.

Protection of Narrow Endemic Plants

Volume I, Section 6.1.3 of the MSHCP requires that within identified NEPSSA, site-specific focused surveys for Narrow Endemic Plants Species will be required for all public and private projects where appropriate soils and habitat are present. The Project is located in the NEPSSA but would not result in

impacts to NEPSSA target species as the habitat evaluations for this plant species concluded that habitat for NEPSSA target species was absent from the Project area. As such, the Project would be consistent with Section 6.1.3 of the MSHCP.

Guidelines Pertaining to Urban/Wildland Interface

The MSHCP Urban/Wildland Interface Guidelines are intended to address indirect effects associated with locating development in proximity to the MSHCP Conservation Area, including PQP conservation lands. As the MSHCP Conservation Area is assembled, development is expected to occur adjacent to the Conservation Area. Future development in proximity to the MSHCP Conservation Area may result in edge effects with the potential to adversely affect biological resources within the Conservation Area. To minimize such edge effects, the guidelines shall be implemented in conjunction with review of individual public and private development projects in proximity to the MSHCP Conservation Area and address drainage, toxics, lighting, noise, invasive species, barriers and grading/land development. As previously identified the PVSD Channel Improvement area is classified as PQP land, and the Rider 2 and Rider 4 sites are adjacent to the Channel. Therefore, the MSHCP Urban/Wildland Interface Guidelines apply to the Project.

- **Drainage/Toxics.** Projects in proximity to the MSHCP Conservation Area shall incorporate measures, including measures required through the National Pollutant Discharge Elimination System (NPDES) requirements, to ensure that the quantity and quality of runoff discharged to the MSHCP Conservation Area is not altered in an adverse way when compared with existing conditions. In particular, measures shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into the MSHCP Conservation Area. Stormwater systems shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials or other elements that might degrade or harm biological resources or ecosystem processes within the MSHCP Conservation Area. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. Regular maintenance shall occur to ensure effective operations of runoff control systems.

Further, land uses proposed in proximity to the MSHCP Conservation Area that use chemicals or generate bioproducts such as manure that are potentially toxic or may adversely affect wildlife species, habitat or water quality shall incorporate measures to ensure that application of such chemicals does not result in discharge to the MSHCP Conservation Area. Measures such as those employed to address drainage issues shall be implemented.

As further discussed in Section 4.10, Hydrology and Water Quality, of this EIR, the Project's contractor would implement a Stormwater Pollution Prevention Plan (SWPPP) that would address runoff and water quality during construction. The Project-specific Water Quality Management Plans (WQMP) for the building sites would ensure that runoff into the MSHCP Conservation Area (PVSD Channel) is minimized per allowable standards.

- **Lighting.** Under long-term conditions, the Project Applicant would be required to ensure that all exterior lights are shielded where feasible and focused to minimize spill light into the night sky or adjacent properties, including the PVSD Channel. The additional lighting could cause adverse impacts (e.g. predation) to the species inhabiting the conserved lands. Through compliance with the outdoor lighting requirements of Riverside County Ordinance No. 655 and the outdoor lighting

design guidelines of the PVCCSP, the Project's lighting impacts to the MSHCP Conservation Area would be less than significant.

As required by mitigation measure (MM) 1-1 in Section 4.1, Aesthetics, of this EIR, if night lighting is required during construction, shall be downward facing and hooded or shielded to prevent security light from spilling outside the staging area or from directly broadcasting security light into the sky or onto adjacent properties, including the PVSD Channel. This would also serve to ensure that light spill is directed away from foraging or nesting habitat areas.

- **Noise.** Proposed noise-generating land uses affecting the MSHCP Conservation Area are required incorporate setbacks, berms, or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations, and guidelines related to land use noise standards. For planning purposes, wildlife within the MSHCP Conservation Area (including the PVSD Channel) should not be subject to noise that would exceed biological noise level standards of the Equivalent Continuous [Average] Sound Level (Leq), which is 65 dBA Leq. The Project Noise Study included in Appendix K of this EIR (summarized in Section 4.12, Noise) notes that the noise levels during construction activity would range from 58.0 to 89.4 dBA Leq at noise-sensitive biological resource receiver locations, with the highest noise levels associated with construction of the PVSD Channel improvements. Therefore, the threshold for special-status wildlife species and nesting birds (65 dBA Leq) would be exceeded during construction, resulting in a potentially significant impact. To avoid this impact, soil import and/or export, and bridge construction work, should be conducted outside of the breeding season (February 1 to August 31 is recognized as the breeding season). If this is not feasible, then as required by mitigation measures MM 4-2, sound walls, hay bales, or other measures designed to reduce effects from Project noise levels on special-status wildlife species would be installed/erected prior to the commencement of ground-disturbing activities. Sound monitoring would also occur as needed, within 300 feet of known burrowing owl and nesting bird territories to ensure that noise levels at these locations are below the 65 dBA Leq level and would not affect special-status wildlife species. With implementation of mitigation measure MM 4-2, potential noise impacts would be reduced to a less than significant level.
- **Invasive Species.** Projects adjacent to the MSHCP Conservation Area are required to avoid the use of invasive plant species in landscaping, including invasive, non-native plant species listed in Volume I, Table 6-2 of the MSHCP. The Project proposes landscaping that excludes known invasive vegetation species. The provision of native plant species is further required pursuant to the County's Water Efficient Landscape Ordinance (Ordinance No. 859), which States that "Invasive species of plants shall be avoided especially near parks, buffers, greenbelts, water bodies, conservation areas/reserves and other open space areas because of their potential to cause harm to environmentally sensitive areas." Further, to prevent non-native recruitment, the disturbance area within the PVSD would be seeded using a native seed mix appropriate to the PVSD Channel hydric conditions. The seed mix would be applied within one month of completion of construction activities. Thus, Project impacts to the MSHCP Conservation Area associated with invasive species would be less than significant.
- **Barriers.** Proposed land uses adjacent to the MSHCP Conservation Area would incorporate barriers (i.e., native landscaping, rocks/boulders, fencing, walls, signage) where appropriate, to minimize unauthorized public access, domestic animal predation, illegal trespass, or dumping in

the MSHCP Conservation Area. Further, as required by mitigation measure MM 4-1, orange silt fencing would be placed to demarcate the limits of disturbance in the PVSD Channel. Its placement would be overseen by a biological monitor and all preliminary vegetation removal and initial grading would be monitored by a biologist to ensure no encroachment beyond the limits of disturbance in the PVSD Channel would occur.

- **Grading/Land Development.** The MSHCP states that manufactured slopes associated with development shall not extend into the MSHCP Conservation Area (the PVSD Channel). The Project, which involves widening of the PVSD Channel, would not extend manufactured slopes into the MSHCP Conservation Area. To ensure impacts are temporary in nature, the Project design is such that once construction activities in the PVSD Channel have ceased, the area of temporary disturbance within the channel bottom would be returned to elevation contours similar to current conditions.

Therefore, with implementation of the identified mitigation measures, the Project would not conflict with Section 6.1.4 of the MSHCP and impacts would be less than significant.

Additional Needs Survey and Procedures

In accordance with Section 6.3.2 of the MSHCP, Additional Survey Needs and Procedures, additional surveys may be needed for certain species in order to achieve coverage for these species. As previously discussed, the Project area occurs within the CAPSSA but would not impact CAPSSA target species as suitable habitat for CAPSSA target species is absent from the Project area.

In addition, the Project area occurs within the burrowing owl survey area but would not result in impacts to burrowing owls based on the results of a focused burrowing owl burrow survey. Further, as identified in PVCCSP EIR mitigation measure MM Bio 2, pre-construction surveys would be conducted to ensure that Project construction activities would not result in the direct harm of burrowing owls that could occur onsite in the future. The Project would be consistent with Section 6.3.2 of the MSHCP.

Additional Project-Level Mitigation Measures

- MM 4-1** Prior to the issuance of a grading permit for the PVSD Channel, the Project Applicant shall provide written evidence to the City of Perris that that the contractor specifications require installation of orange silt fencing to demarcate the limits of disturbance in the PVSD Channel, and that a qualified biological monitor has been retained to oversee installation of the orange silt fencing and all preliminary vegetation removal. Initial grading shall be monitored by a qualified biologist to ensure no encroachment beyond the limits of disturbance in the PVSD Channel would occur.
- MM 4-2** Prior to the issuance of grading permits, if grading and/or construction activities are scheduled to occur during the breeding season (February 1 to August 31), the Planning Department shall verify that the following requirements are shown on the grading and/or building permit plans:
- A. No clearing, grubbing, grading, or other construction shall occur between February 1 to August 31, until the following requirements have been met to the satisfaction of the Planning Manager:

- i. A qualified Biologist shall survey Public/Quasi-Public (PQP) Conserved Lands (PVSD Channel) that would be subject to construction noise levels exceeding 65 dBA Leq for nesting birds. Preconstruction surveys shall be conducted by a qualified Biologist prior to grading activities.
 - ii. No construction activities shall be initiated where construction activities would result in noise levels exceeding 65 dBA Leq within 300 feet of known burrowing owl and nesting bird territories. Noise levels shall be determined by an acoustician deemed qualified by the Planning Manager. OR
 - iii. Under the direction of a qualified Acoustician, noise attenuation measures (such as sound walls, hay bales, or other measures designed to reduce effects from Project noise levels) shall be installed to ensure noise levels from construction activities shall not exceed 65 dBA Leq within 300 feet of known burrowing owl and nesting bird territories. Concurrent with construction and the noise attenuation measures, noise monitoring shall be conducted to ensure that noise levels do not exceed 65 dBA Leq.
- B. If preconstruction surveys demonstrate that burrowing owl and nesting birds are not present, the project Biologist shall submit a report with substantial evidence to the Planning Department that demonstrates noise attenuation measures are not necessary. The report shall describe the methodology and results of negative preconstruction survey.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

4.4.5 CUMULATIVE IMPACTS

Anticipated cumulative impacts to biological resources are addressed by the MSHCP, which, as currently adopted, addresses 146 "Covered Species" that represent a broad range of habitats and geographical areas within western Riverside County, including threatened and endangered species and regionally- or locally-sensitive species that have specific habitat requirements and conservation and management needs. The MSHCP addresses biological impacts for take of Covered Species within the MSHCP area. Impacts to Covered Species and establishment and implementation of a regional conservation strategy and other measures included in the MSHCP are intended to address the federal, state, and local mitigation requirements for these species and their habitats. Specifically, Section 4.4 of the MSHCP states that:

The MSHCP was specifically designed to cover a large geographical area so that it would protect numerous endangered species and habitats throughout the region. It is the projected cumulative effect of future development that has required the preparation and implementation of the MSHCP to protect multiple habitats and multiple endangered species.

SKR is listed as Endangered/Threatened and the Project would temporarily or permanently impact potential habitat with the potential habitat (ruderal upland) being judged low in value. However, given the status of the species, the removal of this potential habitat could make a cumulatively considerable contribution to the regional decline of the species. The species is fully covered under the SKR HCP with

both potential project-specific and cumulative effects mitigated to a level of less than significant under CEQA through fee payment to the RCHCA.

Impacts to potential foraging habitat for golden eagle, loggerhead shrike, northern harrier, and San Diego black-tailed jackrabbit could potentially be a cumulatively significant impact. However, each of these species is a fully covered species by the MSHCP and as such any potential cumulative impacts would be mitigated through coverage afforded by the MSHCP.

The Project has the potential to impact native bird nests if vegetation is removed during the nesting season (February 1 to August 31). Impacts to nesting native birds are prohibited by the MBTA and California Fish and Game Code. Although impacts to native birds are prohibited by MBTA and similar provisions of California Fish and Game Code, impacts to native birds by the proposed Project would not make a cumulatively considerable contribution to the regional decline of native nesting birds. The native birds with potential to nest in the Project footprint would be those that are common to the region. The number of individuals potentially affected by the Project would not significantly affect regional populations of such species. Further PVCCSP EIR mitigation measure MM Bio 1 requires compliance with the MBTA and California Fish and Game Code, and pre-construction nesting bird surveys if construction occurs during the nesting season, and Project-specific mitigation measure MM 4-2 would reduce potential impacts to nesting birds in the PQP lands during construction to a less than significant level.

The proposed PVCC Channel improvements would result in temporary and permanent impacts to federal and state jurisdictional waters and 0.20 acre of CDFW/MSHCP riparian resources would be temporarily disturbed. These resources have declined appreciably over the past several decades and there is potential the Project could make a cumulatively considerable contribution to the regional decline of these resources. However, because the Project consists of widening the existing onsite portion of the PVSD Channel, the Project is self-mitigating as it would increase the amount of onsite jurisdictional, riparian and riverine areas beyond pre-Project conditions.

In summary, with mitigation, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to biological resources.

4.4.6 REFERENCES

GLA, 2020. Glenn Lukos Associates, Inc. *Biological Technical Report for Rider 2 and Rider 4 Warehouse Project*. September 10, 2020. Included in Appendix C of this EIR.

GLA, 2020. Glenn Lukos Associates, Inc. *Biological Technical Report for Phase I Perris Valley Storm Drain Channel Improvement Project*. September 10, 2020. Included in Appendix C of this EIR.

4.5 CULTURAL RESOURCES

This section evaluates the Project's potential to have adverse effects on historical and archaeological resources. Information presented in this section is primarily based on the following documents. References used to prepare this section are listed in Section 4.5.6, References.

- *A Phase I Cultural Resources Survey for the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project, Perris California*, prepared by Brian F. Smith and Associates, Inc. (BFSA) (Cultural Resources Survey) (September 2020) (Appendix D of this Environmental Impact Report [EIR]).
- *A Class III Section 106 (NHPA) Study for the Perris Valley Storm Drain Channel Widening Project, Perris, Riverside County, California*, prepared by Brian F. Smith and Associates, Inc. (PVSD Channel Section 106 Study) (June, 2020).¹

The Cultural Resources Survey was prepared in compliance with Perris Valley Commerce Center Specific Plan (PVCCSP) EIR mitigation measure MM Cult 1. The Confidential Appendix for the Cultural Resources Survey and the PVSD Channel Section 106 Study are not appended to this Draft Environmental Impact Report (EIR). While they are on file with the City of Perris Planning Division, they are not available for public review. Any review may only be conducted by a qualified professional ethically required to keep the data in the reports from public dissemination and ultimately protecting resources from any possible adverse impacts. This level of confidentiality is referenced in Section 6354.10 of the *California Government Code*.

No comments regarding cultural resources were raised at the EIR scoping meeting. In its Notice of Preparation (NOP) comment letter, the Native American Heritage Commission (NAHC) provided information about Assembly Bill (AB) 52 and Senate Bill (SB) 18, which address requirements consultation with Native American tribes related to tribal cultural resources (TCRs); and, provided standard guidance on the scope of the analysis of potential impacts to archaeological resources and TCRs. TCRs and input received from Native American tribes during the scoping process, and during AB 52 consultation, is discussed in Section 4.14, Tribal Cultural Resources, of this EIR.

4.5.1 EXISTING SETTING

Section 4.4, Cultural Resources, of the PVCCSP EIR, includes a detailed discussion of the environmental setting for cultural resources, including geologic setting, ethnohistoric setting, archaeological setting, and historic setting. This information remains applicable to the Project. The following discussion summarizes

¹ As identified in Section 3.0, Project Description, of this EIR, the proposed improvements to the PVSD Channel entail Phase 1 of a larger channel improvement project, which would ultimately extend north to just past Ramona Expressway and south of Rider Street. Phase 1 of the proposed PVSD Channel improvements, which would be implemented as part of the Project, begin approximately 100 feet north of Morgan Street and extend to just south of Rider Street. As part of processing a Section 404 Permit for the PVSD Channel Widening Project, the United States Army Corps of Engineers (USACE) has requested that a Section 106 archaeological review be conducted as part of their review for the permit for the USACE Area of Potential Effect (APE). The *Class III Section 106 (NHPA) Study for the Perris Valley Storm Drain Channel Widening Project* addresses the larger channel improvement project.

Project-specific information presented in the technical reports prepared for this Project (as identified previously) based on the research and field surveys conducted, as described below.

Archaeological Resources

Prehistoric Period

Paleo Indian, Archaic Period Milling Stone Horizon, and the Late Prehistoric Takic groups are the three general cultural periods represented in Riverside County. The discussion of the cultural history of Riverside County presented in the Cultural Resources Survey included in Appendix D references the San Dieguito Complex, Encinitas Tradition, Milling Stone Horizon, La Jolla Complex, Pauma Complex, and San Luis Rey Complex, since these culture sequences have been used to describe archaeological manifestations in the region. The Late Prehistoric component present in the Riverside County area was represented by the Cahuilla, Gabrielino, and Luiseño Indians. Absolute chronological information, where possible, is incorporated in the Cultural Resources Survey to examine the effectiveness of continuing to interchangeably use these terms. Reference is made to the geological framework that divides the culture chronology of the area into four segments: the late Pleistocene (20,000 to 10,000 YBP [years before the present]), the early Holocene (10,000 to 6,650 YBP), the middle Holocene (6,650 to 3,350 YBP), and the late Holocene (3,350 to 200 YBP). These periods are summarized below and further described in the Cultural Resources Survey included in Appendix D.

- **Paleo Indian Period (Late Pleistocene: 11,500 to circa 9,000 YBP).** The Paleo Indian Period is associated with the terminus of the late Pleistocene. The environment during the late Pleistocene was cool and moist, which allowed for glaciation in the mountains and the formation of deep, pluvial lakes in the deserts and basin lands. However, by the terminus of the late Pleistocene, the climate became warmer, which caused glaciers to melt, sea levels to rise, greater coastal erosion, large lakes to recede and evaporate, extinction of Pleistocene megafauna, and major vegetation changes. Paleo Indians were likely attracted to multiple habitat types, including mountains, marshlands, estuaries, and lakeshores. These people likely subsisted using a more generalized hunting, gathering, and collecting adaptation utilizing a variety of resources including birds, mollusks, and both large and small mammals.
- **Archaic Period (Early and Middle Holocene: circa 9,000 to 1,300 YBP).** Between 9,000 and 8,000 YBP, a widespread complex was established in the southern California region, primarily along the coast. This complex is locally known as the La Jolla Complex, which is regionally associated with the Encinitas Tradition and shares cultural components with the widespread Milling Stone Horizon. The coastal expression of this complex appeared in the southern California coastal areas and focused upon coastal resources and the development of deeply stratified shell middens that were primarily located around bays and lagoons. By 5,000 YBP, an inland expression of the La Jolla Complex is evident in the archaeological record, exhibiting influences from the Campbell Tradition from the north. These inland Milling Stone Horizon sites have been termed "Pauma Complex". By definition, Pauma Complex sites share a predominance of grinding implements (manos and metates), lack mollusk remains, have greater tool variety (including atlatl dart points, quarry-based tools, and crescentics), and seem to express a more sedentary lifestyle with a subsistence economy based upon the use of a broad variety of terrestrial resources. Although originally viewed as a separate culture from the coastal La Jolla Complex, it appears that these inland sites may be part of a subsistence and settlement system utilized by the coastal

peoples. A more localized complex known as the Greven Knoll Complex is a redefined northern inland expression of the Encinitas Tradition, and is broken into three phases. The shifts in food processing technologies during each of these phases indicate a change in subsistence strategies; although people were still hunting for large game, plant-based foods eventually became the primary dietary resource.

- **Late Prehistoric Period (Late Holocene: 1,300 YBP to 1790).** Many Luiseño hold the world view that as a population they were created in southern California; however, archaeological and anthropological data proposes a scientific perspective. Archaeological and anthropological evidence suggests that at approximately 1,350 YBP, Takic-speaking groups from the Great Basin region moved into Riverside County, marking the transition to the Late Prehistoric Period. It is believed that Takic expansion occurred starting around 3,500 YBP moving toward southern California, with the Gabrielino language diffusing south into neighboring Yuman (Hokan) groups around 1,500 to 1,000 YBP, possibly resulting in the Luiseño dialect. The Sutton model suggests that the Luiseño did not simply replace Hokan speakers, but were rather a northern San Diego County/southern Riverside County Yuman population who adopted the Takic language. This period is characterized by higher population densities and elaborations in social, political, and technological systems. Economic systems diversified and intensified during this period with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive, yet effective, technological innovations. Technological developments during this period included the introduction of the bow and arrow between A.D. 400 and 600 and the introduction of ceramics. Atlatl darts were replaced by smaller arrow darts, including Cottonwood series points. Other hallmarks of the Late Prehistoric Period include extensive trade networks as far-reaching as the Colorado River Basin and cremation of the dead.

Protohistoric and Ethnohistoric Periods (1700s to Present)

Ethnohistoric and ethnographic evidence indicates that three Takic-speaking groups occupied portions of Riverside County: the Cahuilla, the Gabrielino, and the Luiseño. A discussion of the ethnohistoric and ethnographic background of the Project area and surrounding areas is provided in Section 4.14, Tribal Cultural Resources, of this EIR.

Results of Records Search and Site Survey

BFSA conducted a records search at the Eastern Information Center (EIC) located at the University of California, Riverside, which is the State of California's official cultural resource records repository for the County of Riverside. The results of the records search are provided in the Confidential Appendix to the Cultural Resource Survey. As identified in Table 4.5-1, the EIC search identified seven resources within one mile of the area covered by the Cultural Resources Survey, which consists of the Project area and site-adjacent improvement areas (referred to herein as the "Project area") (BFSA, 2020).

Table 4.5-1 Previously Recorded Archaeological Sites within a One-Mile Radius of the Project

Site Number	Site Description
RIV-7758	Prehistoric bedrock milling site
RIV-6726H	Historic Colorado River Aqueduct and road alignment
RIV-7744	Perris Indian School (1892 to 1904); Smith-Lowery Farm dating to circa 1910
RIV-8389	Historic farm equipment
P-33-007641	J.B Mayer Ranch
P-33-007659	Historic Quonset huts
P-33-008699	Historic reservoir remnants and standpipe
Source: (BFSA, 2020)	

One of the resources, RIV-6726H, which is recorded as the historic Colorado River Aqueduct (CRA), is mapped as transecting the Perris Valley Storm Drain (PVSD) Channel improvement area within the Project area and just south of the proposed linear park. When RIV-6726H was first recorded in 2000, many portions of the CRA, including the segment recorded within the Project area, were mapped based solely upon the alignment shown on the corresponding USGS quadrangle maps, not formal field checks. Although historic segments of RIV-6726H have been determined eligible for the California Register of Historic Resources (CRHR) and the National Register of Historic Places (NRHP), the portion that traverses the Project area is an actively maintained buried pipeline with no historic surface elements or character-defining features. Further, the mapped alignment of RIV-6726H is situated within a Metropolitan Water District (MWD) easement (APNs 303-170-015 and -016). Of the remaining resources identified during the records search, five are historic (Perris Indian School and Smith-Lowery Farm, farm equipment, the J.B. Mayer Ranch, Quonset huts, and a reservoir remnant and standpipe) and one is prehistoric (a bedrock milling site just under one mile north of the Project area).

The records search results also indicated that there have been 47 cultural resource studies conducted within a one-mile radius of the Project area, five of which covered portions of the Project area. Although previous studies have included portions of the Project area, the entire Project area has never been surveyed for cultural resources. Rather, studies focused on: linear fiber optic alignments, which traversed small portions of the subject property; a linear project focused only on the PVSD Channel that did not identify any resources within the storm drain alignment; and, a large overview of resources within the North Perris Industrial Specific Plan, which would later become the current PVCCSP. The PVCCSP study included a focused survey, records search, literature review, and public outreach. Although the Project area was not surveyed during the PVCCSP study, based upon research, recent development, and cultural resource density, it was assigned a cultural resource sensitivity rating of moderate to high to contain cultural resources.

Archeological investigation procedures consisted of a survey of the Project area. On August 9 and October 24, 2018, BFSA conducted the archaeological field surveys to determine if cultural resources exist within the Project area. The archaeological survey was accomplished by conducting a systematic pedestrian survey that followed survey transects, which were spaced 15 to 20 meters apart and parallel to the existing street and PVSD Channel alignments. Ground visibility was generally good to excellent due to the limited vegetation. All areas of disturbed ground and any rodent burrows were analyzed for evidence of buried archaeological deposits. Using these methods, the ground surface within the entire Project area was systematically and carefully examined for any evidence of human activities dating to the prehistoric or historic period (i.e., 50 years ago or older). No prehistoric cultural resources were

discovered during the survey. The lack of prehistoric sites is likely due to the absence of bedrock and natural sources of water. During both days of the survey, the mapped alignment of RIV-6726H, the CRA, was investigated; however, as discussed above, it is an actively maintained, buried pipeline with no historic surface elements or character-defining features.

Twelve previous studies have collectively covered the entire PVSD Channel Widening Project addressed in the *Class III Section 106 (NHPA) Study for the Perris Valley Storm Drain Channel Widening Project* without identifying any historic resources within the USACE APE. The BFSA archaeological survey of the PVSD Channel Improvement Project was conducted on October 24, 2018. Survey conditions were generally good. The entire property was accessible with approximately 80 percent ground visibility, which was hindered at times by paved surfaces and pockets of nonnative vegetation. The USACE APE consists mainly of the man-made earthen drainage channel and the previously disturbed banks. Generally, the section of the PVSD Channel located within the USACE APE is flanked on both the eastern and western banks by a paved pedestrian/bike path and dirt and gravel access road respectively. Although the USACE APE contains a segment of the PVSD along with associated access roads, the pedestrian/bicycle path, culverts, and bridges, all infrastructure is actively maintained and/or modern. Further, both banks of the channel are disturbed, having been previously cleared through the agricultural use of the land and partially graded as part of adjacent development projects. No cultural resources, either historic or prehistoric, were discovered during the survey. The lack of prehistoric sites is likely due to the absence of bedrock and natural water sources.

Historical Resources

Regional Context

The historic background of the area began with the Spanish colonization of Alta California. The first Spanish colonizing expedition reached southern California in 1769 with the intention of converting and civilizing the indigenous populations, as well as expanding the knowledge of and access to new resources in the region. In the late eighteenth century, the San Gabriel (Los Angeles County), San Juan Capistrano (Orange County), and San Luis Rey (San Diego County) missions began colonizing southern California and gradually expanded their use of the interior valley (into what is now western Riverside County) for raising grain and cattle to support the missions. The San Gabriel Mission claimed lands in what is now Jurupa, Riverside, San Jacinto, and the San Geronimo Pass, while the San Luis Rey Mission claimed land in what is now Lake Elsinore, Temecula, and Murrieta. The indigenous groups who occupied these lands were recruited by missionaries, converted, and put to work in the missions. Throughout this period, the Native American populations were decimated by introduced diseases, a drastic shift in diet resulting in poor nutrition, and social conflicts due to the introduction of an entirely new social order.

While no missions were ever built in what would become Riverside County, many mission outposts (asistencias), were established in the early years of the nineteenth century to extend the missions' influence to the backcountry. Two outposts located in Riverside County include San Jacinto and Temecula. Mexico gained independence in 1822 and desecularized the missions in 1832, signifying the end of the Mission Period. By this time, the missions owned some of the best and most fertile land in southern California. In order for California to develop, the land would have to be made productive enough to turn a profit. The new government began distributing the vast mission holdings to wealthy and politically connected Mexican citizens. The "grants" were called "ranchos." The treatment of Native Americans grew worse during the Rancho Period. Most of the Native Americans were forced off of their land or put to work on the now privately-owned ranchos, most often as slave labor.

In 1846, war erupted between Mexico and the United States. In 1848, with the signing of the Treaty of Guadalupe Hidalgo, the region was annexed as a territory of the United States, leading to California becoming a state in 1850. This event generated a steady flow of settlers into the area, including gold miners, entrepreneurs, health-seekers, speculators, politicians, adventurers, seekers of religious freedom, and individuals desiring to create utopian colonies. In early 1852, the Native Americans of southern Riverside County, including the Luiseño and the Cahuilla, thought they had signed a treaty resulting in their ownership of all lands from Temecula to Aguanga east to the desert, including the San Jacinto Valley and the San Gorgonio Pass. The Temecula Treaty also included food and clothing provisions for the Native Americans. However, Congress never ratified the treaties, and the promise of one large reservation was rescinded.

With the advent of the transcontinental railroad in 1869, land speculators, developers, and colonists began to invest in southern California. The first colony in what was to become Riverside County was Riverside itself. By the late 1880s and early 1890s, there was growing discontent between Riverside and San Bernardino. In May 1893, voters living within portions of San Bernardino County (to the north) and San Diego County (to the south) approved the formation of Riverside County. Early business opportunities were linked to the agriculture industry, but commerce, construction, manufacturing, transportation, and tourism also provided a healthy local economy. By the time of Riverside County's formation, Riverside had grown to become the wealthiest city per capita in the country due to the successful cultivation of the navel orange.

General History of the City of Perris

The Project is located within the former Rancho San Jacinto Nuevo y Portrero land grant. The rancho was granted to Miguel Pedorena by Mexican Governor Pío Pico in 1846. After Pedorena's death in 1850, the grant passed to his heirs under the guardianship of T.W. Sutherland. In 1881, the California Southern Railroad laid the tracks for the transcontinental route of the Santa Fe Railway through the plains, west of the Project area. At this time, the area where the railroad was placed was referred to as the San Jacinto Plains. Surveying and construction of the railroad route was led by Patrick Thomas Perris, for whom the City of Perris was named. The railroad was completed in 1882, which allowed hundreds of settlers to enter the area for homesteading, most of them settling in Pinacate to the south. While still part of San Diego County, Rancho San Jacinto Nuevo y Portrero was patented to T.W. Sutherland, guardian of Miguel Pedorena's children, in 1883. In 1885, the citizens of Pinacate gathered together to create a more conveniently located station along the railroad route, and in 1886 the town site of Perris was established. In 1911, Perris became an incorporated city, relying heavily upon dry grain farming and citrus groves.

Project Area

As previously identified under the discussion of archaeological resources, the records search conducted at the EIC identified six buried historic resources within one mile of the Project area. One of the resources, RIV-6726H, is recorded as the historic CRA, which is located, in part, in the Project area, and is further discussed below. The remaining five are not within the Project area and consist of the Perris Indian School and Smith-Lowery Farm, farm equipment, the J.B. Mayer Ranch, Quonset huts, and a reservoir remnant and standpipe.

Although the historic maps and aerial photographs indicate no structures have ever been located within the Project area, archival property research was conducted at the County of Riverside Robert J. Fitch Archives. The additional archival research utilized the County Assessor's lot books to trace the ownership of the Project area between the early twentieth century and the 1960s, while online Assessor's records

were utilized for more modern property information. Based on assessed values, the lot books confirm that no buildings were ever constructed within the Project area.

The Project area is located outside of the originally-delineated City of Perris. However, this area has traditionally been associated with the City and historically part of its sphere of influence. Starting in the late nineteenth century and extending through the twentieth century, this region was mainly an agricultural community. The Project area was originally split in half, with the western half located within the 1891 Riverside Tract and the eastern half located within the 1927 Fair View Farms No. 5 Subdivision. The land was laid out in 80-acre blocks which were subdivided into ten acre lots. The farm lots were sold off to farmers and speculators.

Between 1893 and 1895, the entire western portion of the Project area (Lots 19 and 23) was owned by the Perris Irrigation District, also known as the Perris Land Company. Between 1895 and 1964, the western portion of the Project area changed ownership numerous times.

The eastern half of the property was subdivided in 1927 and encompasses much of what originally the Fair View Farms No. 5 subdivision. When first subdivided, the property was owned by the Fair View Farms Company. Only the southernmost sections (Section 6 of Lot 11 and Section 8 of Lot 12), were purchased by private individuals. However, all of Lots 11 and 12 were quickly sold to the Vitruvian Corporation in 1933 and then to the State of California in 1936. The State acquisition of the property appears to be tied to the 1936 construction of the CRA in that year. Ultimately, Lots 11 and 12 were sold to John Coudures in 1943. Coudures and his son, John Jr., were successful sheep farmers who owned large swaths of land throughout the region. Both aided in the development of the Eastern Metropolitan Water District (EMWD) and John Jr. served as a director on the EMWD board for several years. Although the Coudures owned the property, the lot books confirm that they did not live there, as no value for structures was ever assessed for the lots. Further, the property was sold to Vernon O. and Zippora Stahl in 1962, who were still listed as owners of the property in 1964.

The Stahls were successful dairy farmers who owned property throughout southern California. The Stahls' dairy business was managed by Zippora, who had learned the business while growing up in Chino. Vernon's main profession was as a physician in Ontario. Zippora Stahl "served on the executive committee of the Chino Water Basin, legislative committee of High Grade Milk Producers Association, and was the first dairywoman to be named as director of the California Milk Advisory Board". In addition, in 1975, she was honored by the Los Angeles Chamber of Commerce as "Dairy Woman of the Year" and was elected to the First National Bank's Board of Directors in 1977. Although the Stahls are listed as owning the property, they operated out of Chino where they lived. The Stahls eventually would combine both the western Riverside Tract lots and the eastern Fair View Farms lots into the previous agricultural fields that now comprise the Project area. The Stahls, or their family trust, are listed within the online grantee/grantor index for the entire subject property when the parcels were sold in 1982 to Albert and Lena Briano.

Investors were guaranteed the success of the Perris Irrigation District; however, by 1900, many of the properties had failed, as farmers could not obtain a steady access to water. Although the Perris Irrigation District was not as successful as originally predicted, traditionally, the area did remain agricultural throughout the twentieth century. Due to the limited groundwater, dry grain farming was the main crop until the 1950s, when the EMMD began constructing infrastructure to better distribute water to the region. With better access to water, alfalfa, the King potato (which would produce two crops a year), and sugar beets became the mainstay of farming the Perris Valley. Based on this information, it is most likely that the Project area was utilized throughout the mid-twentieth century to grow grasses for livestock and not potatoes or beets.

During preparation of the Cultural Resources Survey, BFSA reviewed the following historic sources: NRHP Index; Office of Historic Preservation (OHP), Archaeological Determinations of Eligibility (ADOE); the OHP, Directory of Properties in the Historic Property Data File (HPDF); Caltrans Historic Bridge Inventory (CHBI); the U.S. Geological Survey's (USGS) topographic maps 30' USGS *Elsinore* (1901), 15' USGS *Perris* (1943), and 7.5' USGS *Perris* (1953); and aerial photographs (1950s to present). The NRHP, ADOE, and the HPD do not indicate the presence of any other historic resources within or immediately adjacent to the Project area; however, the CHBI does list the Rider Street Bridge (Bridge No. 56C0536), which was constructed in 2005. However, this bridge is not old enough to qualify as a historical resource under CEQA and is evaluated by Caltrans as "Not Eligible for the NRHP."

As the CRA (RIV-6726H) is mapped within the MWD easement that bisects the Project, additional research was conducted utilizing historic maps (1901 through 1980) and aerial photographs (1953 through 2016). The 1901 30' USGS *Elsinore* and 1943 15' USGS *Perris* topographic maps do not show any structures within the Project area. The 1953 7.5' USGS *Perris* Quadrangle is the first map to show the alignment of the CRA through the Project area, while an aerial photograph from 1962 is the first to show the PVSD Channel. Subsequent maps and aerial photographs from 1966 through 1990 show the steady use and maintenance of the MWD easement in which the CRA is buried as well as the PVSD Channel. Neither the maps nor the aerial photographs show any buildings within the Project area.

The PVSD Channel within the Project area was constructed in 1955 and therefore meets the 50-year CEQA threshold to be evaluated as a significant historic resource. Alterations to the surrounding landscape combined with the regular maintenance and improvement of the PVSD Channel has diminished its integrity. As such, the PVSD Channel is more reflective of a modern storm drain channel than a historic feature. Further, the drainage was built by the Riverside County Flood Control and Water Conservation District (RCFCWCD) during the 1950s and no significant individuals or events can be directly tied to it. The man-made drainage is one of many such channels constructed throughout southern California during the mid-twentieth century to mitigate the possibility of floods and is not the work of a master builder or architect. Finally, the PVSD has not and is unlikely to yield any information important to the history of the region. Therefore, the PVSD is not eligible for listing on the CRHR or NRHP and does not qualify as a significant resource pursuant to Section 15064.5.

Based on the archival investigations of the Project area's history, and individuals who owned the lots, no events or individuals important to the historic development of the region were identified.

4.5.2 EXISTING POLICIES AND REGULATIONS

Section 4.4 of the PVCCSP EIR provides a complete discussion of the regulatory framework for the analysis of cultural resources impacts, which is incorporated by reference. The regulatory framework discussion includes the regulations listed below.

Federal Regulations

- National Environmental Policy Act/National Historic Preservation Act (NHPA),
- Historic and Archaeological Resource Surveys,
- Facade Easement Donation,
- Antiquities Act of 1906, and

- Historic Rehabilitation Tax Credit.

State Regulations

- California Register of Historic Resources (*California Public Resources Code*, Section 5020 et seq.),
- *California Health and Safety Code* (Sections 7050.5, 7051, and 7054),
- *California Public Resources Code* (Section 5097.98),
- *California Public Resources Code* (Section 5097.5),
- Senate Bill 18, California Tribal Consultation Guidelines,
- State Historical Building Code, and
- California Heritage Fund Grant Program.

Local Regulations

- City of Perris General Plan
- City of Perris General Plan Historic Points of Interest

The following discussion summarizes the regulatory information for historic and archaeological resources presented in the PVCCSP EIR that is relevant to the Project. Regulatory information specifically relevant to Tribal Cultural Resources (e.g., Assembly Bill [AB] 52) is presented in Section 4.14, Tribal Cultural Resources, of this EIR.

National Historic Preservation Act of 1966 (as amended), Section 106

The National Historic Preservation Act (NHPA) declares a national policy of historic preservation to protect, rehabilitate, restore, and reuse districts, sites, buildings, structures, and objects significant in American architecture, history, archaeology, and culture. The NHPA established the NRHP, State Historic Preservation Offices (SHPOs) and programs, and the Advisory Council on Historic Preservation. This Act applies to all properties on or eligible for inclusion in the NRHP. The Section 106 review process requires consultation to mitigate damage to “historic properties”, as defined per the Code of Federal Regulations (CFR, Title 36, Section 800.16[1]), including Native American traditional cultural places (TCPs). Evaluation of cultural resources consists of determining whether it is significant (i.e., whether it meets 1 or more of the criteria for listing in the NRHP). These eligibility criteria are presented in the PVCCSP EIR.

California Register of Historic Resources

State law also protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources in California Environmental Quality Act (CEQA) documents. A cultural resource is an important historical resource if it meets any of the criteria found in Section 15064.5(a) of the State CEQA Guidelines. These criteria are nearly identical to those for the NRHP. The State Office of Historic Preservation (OHP) maintains the CRHR (*California Public Resources Code*, Section 5020 et seq.).

Properties listed, or formally designated eligible for listing, on the NRHP are nominated to the CRHR and then selected to be listed on the CRHR, as are State Landmarks and Points of Interest.

California Health and Safety Code (Sections 7050.5, 7051, and 7054)

These sections collectively address the illegality of interference with human burial remains (except as allowed under applicable sections of the *California Public Resources Code*). These sections also address the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction. Procedures to be implemented are established for: (1) the discovery of Native American skeletal remains during construction of a project; (2) the treatment of the remains prior to, during, and after evaluation; and (3) reburial.

California Public Resources Code (Section 5097.98)

Section 5097.98 of the *California Public Resources Code* addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction. This Section also establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project, and establishes the NAHC to resolve disputes regarding the disposition of such remains. It has been incorporated into Section 15064.5(e) of the State CEQA Guidelines.

California Public Resources Code (Section 5097.5)

Section 5097.5 of the *California Public Resources Code* protects, among other things, paleontological sites on State lands. Sections 4306 and 4309 of the *California Administrative Code* establish authority and processes to protect paleontological resources while allowing mitigation through the permit process. Potential impacts to paleontological resources must be assessed for any project subject to review under CEQA.

City of Perris

The Project area is located within the PVCCSP area and is therefore subject to applicable mitigation measures in the PVCCSP EIR, as further discussed in Section 4.5.4 and 4.5.5.

The Conservation Element of the City's General Plan identifies goals and policies related to cultural resources. The goals and policies applicable to the proposed project and a discussion of the Project's consistency is provided in Table 4.11-2, *City of Perris General Plan Consistency Analysis*, in Section 4.11, Land Use and Planning, of this EIR.

4.5.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on cultural resources if it will:

- a. Cause a substantial adverse change in the significance of historical resources pursuant to Section 15064.5.

- b. Cause a substantial adverse change in the significance of archaeological resources pursuant to Section 15064.5.
- c. Disturb any human remains, including those interred outside of formal cemeteries.

4.5.4 ENVIRONMENTAL IMPACTS

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

No Standards and Guidelines related to cultural resources are included in the PVCCSP.

PVCCSP EIR mitigation measure MM Cult 1 below outlines the requirements for preparation of a Phase I Cultural Resources Study, which has been prepared for the Project and is included in Appendix D of this EIR. Mitigation measures MM 5-1 and MM 5-2 presented below, implement PVCCSP EIR mitigation measures MM Cult 2 and MM Cult 6, respectively, as subsequently revised by the City of Perris.

MM Cult 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 archeologist² 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 shall also 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.

² For the purpose of this measure, the City of Perris considers professional archaeologists to be those who meet the United States Secretary of the Interior's standards for recognition as a professional, including an advanced degree in anthropology, archaeology, or a related field, and the local experience necessary to evaluate the specific project. The professional archaeologist must also meet the minimum criteria for recognition by the Register for Professional Archaeologists (RPA), although membership is not required.

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 and discovered 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.

Impact Analysis

Threshold a Would the Project cause a substantial adverse change in the significance of historical resources pursuant to Section 15064.5?
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The PVCCSP EIR concludes that, with implementation of identified mitigation measures, development of allowed uses and infrastructure projects identified in the PVCCSP would not conflict with or cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines (City of Perris, 2011).

Under existing conditions, there are no building structures in the Project area and historic maps and aerial photographs indicate no structures have ever been located within the Project area. As previously discussed, the PVSD Channel is not eligible for listing on the CRHR and does not qualify as a significant resource under CEQA. Additionally, the CHBI lists the Rider Street Bridge (Bridge No. 56C0536), which was constructed in 2005. However, this bridge is not old enough to qualify as a historical resource under CEQA and is evaluated by Caltrans as "Not Eligible for the NRHP." As discussed under Threshold b, below, within the Project area the CRA (RIV-6726H) is an actively maintained buried pipeline with no

historic surface elements or character-defining features, and would be protected in place as part of the Project.

Therefore, implementation of the Project would not cause a substantial adverse change in the significance of a historical resource and no impact would occur (BFSA, 2020; BFSA, 2020).

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

No impacts would occur.

Threshold b Would the Project cause a substantial adverse in the significance of archaeological resources pursuant to Section 15064.5?

The PVCCSP EIR concludes that, with implementation of identified mitigation measures, development of allowed uses and infrastructure projects identified in the PVCCSP would not conflict with or cause a substantial adverse change in the significance of an archaeological resource, as defined in Section 15064.5 of the State CEQA Guidelines.

As discussed previously, preparation of the Cultural Resources Survey and PVSD Channel Section 106 Study included completion of required records searches and field surveys. According to the records searches conducted by BFSA, no prehistoric resources were found in the Project area; however, seven archaeological resources were identified within a one-mile radius of the Project area. One resource, the CRA (RIV-6726H), extends between the Rider 2 and Rider 4 building sites, and across the PVSD Channel within the Project area (within the MWD easement). The EIC records search indicate that portions of the CRA have been determined eligible for the CRHP and NRHP. However, the portion of the CRA that transects the Project area is an actively maintained buried pipeline with no historic surface elements or character-defining features. Additionally, this portion of the CRA is located within an MWD easement and, would be protected in place by the Project (refer to Section 3.6.6, PVSD Channel Improvements, of this EIR). Implementation of the Project would have no substantial adverse change to the CRA.

Of the remaining archaeological resources within one mile of the Project area, five are historic (Perris Indian School and Smith-Lowery Farm, farm equipment, the J.B. Mayer Ranch, Quonset huts, and a reservoir remnant and standpipe) and one is prehistoric (a bedrock milling site just under one mile north of the Project area).

Given that major ground disturbing activities associated with the Project would mainly be focused within the extensively impacted area surrounding the PVSD Channel and that no archaeological sites, features, or artifacts were identified within the Project area during the survey, no impacts to known or recorded cultural resources are anticipated with the proposed development of the Project. Further, as a result of previous ground-disturbing activities associated with the historical agricultural uses of the Project area and extensive impacts from the development and regular maintenance of the PVSD Channel, there is minimal to nil potential for archaeological resources to be present or disturbed by the proposed development. (BFSA, 2020)

Notwithstanding, there is a possibility that archaeological resources may be present beneath the site's subsurface, and may be impacted by deeper ground-disturbing activities associated with Project construction. There is a greater likelihood of archaeological resources being found in close proximity to historic water bodies such as the PVSD Channel than at other sites within Perris. Notably, as further described in Section 3.0, Project Description, of this EIR, excavation for installation of the Project's utility infrastructure (including water quality basins) would range from 10 to 15 feet below the ground surface. Downstream of the CRA, excavation in the PVSD Channel bottom could extend up to a maximum of 8 feet. The proposed building sites would be subject to shallower excavation; the building sites would be overexcavated to a depth of at least 4 feet below existing grade and to a depth of 4 feet below proposed building pad subgrade elevation. Excavated materials from the PVSD Channel widening would be placed on the building sites to raise the elevation outside of the 100-year flood plain. If any prehistoric resources are unearthed during construction that meet the definition of an archaeological resource cited in CEQA Guidelines Section 15064.5 and are disturbed/damaged by Project construction activities, impacts to archaeological resources would be potentially significant. Mitigation measure MM 5-1 presented below, which implements PVCCSP EIR mitigation measure MM Cult 2, as subsequently revised by the City of Perris, requires that an archaeological monitor and Luiseño representative be present during initial ground-disturbing activities, and identifies steps to be taken to protect any resources encountered. With implementation of mitigation measure MM 5-1, potential impacts to archaeological resources would be reduced to a less than significant level.

Additional Project-Level Mitigation Measures

MM 5-1 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 within the Project area or within the off-site Project improvement areas for the identification of any previously unknown archaeological and/or cultural resources. Selection of the archaeologist shall be subject to the approval of the City of Perris Director of Development Services and no ground-disturbing activities shall occur within the Project area 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 Luiseño Indians or the Pechanga Band of Luiseño Indians for a Luiseño tribal representative (observer/monitor) to work along with the consulting archaeologist. This tribal 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 tribal 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 tribal

representative(s) should be on-site any time the consulting archaeologist is required to be on-site. Working with the consulting archaeologist, the Luiseño representative(s) shall have the authority to halt, redirect, or divert any activities in areas where the identification, recording, or recovery of Native American resources are on-going.

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

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

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

In the event that archaeological resources are discovered within the Project area 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 undertaken in a manner that avoids destruction or other adverse impacts.

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 tribal representative, determines that monitoring is no longer necessary, monitoring activities can be discontinued following notification to the City of Perris Planning Division.

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

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

Threshold c Would the Project disturb any human remains, including those interred outside of formal cemeteries?
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As identified in the Initial Study for the PVCCSP EIR, the PVCCSP area “has been historically used for agriculture use and therefore, is not expected to contain human remains, including those interred outside of formal cemeteries.” Due to the lack of any indication of a formal cemetery or informal family burial plots on site, the Project would have no impact on known human remains.” In the unlikely event that suspected human remains are uncovered during construction, all activities in the vicinity of the remains shall cease and the contractor shall notify the County Coroner immediately pursuant to Section 7050.5 of the *California Health and Safety Code* and Section 5097.98 of the *California Public Resources Code*. Therefore, impacts to disturbing human remains are less than significant. In addition, mitigation measure MM 5-2, which implements PVCCSP EIR mitigation measure MM Cult 6, as subsequently revised by the City of Perris, further identifies measures that would be taken in the event of the discovery of human remains, and would be implemented to further reduce this less than significant impact.

Additional Project-Level Mitigation Measures

MM 5-2 In the event that human remains (or remains that may be human) are discovered within the Project area during ground-disturbing activities, the construction contractors, Project archaeologist, and/or designated Luiseño tribal representative shall immediately stop all activities within 100 feet of the find. The project proponent shall then inform the Riverside County Coroner and the City of Perris Planning Division immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).

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

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

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

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR Initial Study.

4.5.5 CUMULATIVE IMPACTS

Consistent with the PVCC Specific PVCCSP EIR, the cumulative area for cultural resources is the City of Perris. As identified in the PVCCSP EIR, there were nine identified prehistoric sites (primarily milling slick sites [rocks used to crush grain]), and several sites exhibiting extensive pictographs (rock art), and a few small stone flake scatters. Ten historic archaeological sites occurred within the City at the time the PVCCSP EIR was prepared. However, none are located within the PVCCSP area, which includes the Project area. These historic archaeological sites consist of the remnants (such as foundations) of historic buildings and/or ranch complexes. No known sites likely to contain human remains have been identified in the City of Perris.

Direct impacts to on-site cultural resources are site-specific. Each development proposal received by the City undergoes environmental review and would be subject to the same resource protection requirements as the Project as outlined in the City of Perris General Plan EIR and PVCCSP EIR, as applicable. If there is a potential for significant impacts on cultural resources, an investigation will be required to determine the nature and extent of the resources and to identify appropriate mitigation measures, including requirements such as those identified in this section. Based on the information presented in the required site-specific cultural resource studies, construction activities associated with the Project would not impact any known prehistoric archaeological resources and the likelihood of uncovering previously unknown archaeological resources during Project construction are low due to the nature of the site and the magnitude of disturbance that has occurred on the site. Nonetheless, the potential exists for subsurface archaeological resource that meet the definition of a significant archaeological resource to be discovered within the Project area – and other development project sites in the City – during construction activities. Therefore, without mitigation, the Project would result in a potentially cumulatively considerable contribution to a significant cumulative impact to archaeological resources, if such resources are unearthed during Project construction. The Project includes mitigation measures from the PVCCSP EIR, as revised, to identify, recover, and/or record any cultural resource that may occur within the Project limits resulting in a less than significant impact (refer to mitigation measures MM Cult 1 and MM 5-1). The City of Perris requires incorporation of similar measures in each development Project. As such, the Project

would not result in a cumulatively considerable contribution to a significant cumulative impact to archaeological resources.

Mandatory compliance with the provisions of California Health and Safety Code Section 7050.5, as well as Public Resources Code Section 5097 *et seq.*, (implemented as mitigation measure MM 5-2 in this EIR), would assure that all future development projects within the region, including the currently proposed Project, treat human remains that may be uncovered during development activities in accordance with prescribed, respectful and appropriate practices, thereby avoiding significant cumulative impacts.

4.5.6 REFERENCES

BFSA, 2020. Brian F. Smith and Associates, Inc. *A Class III Section 106 (NHPA) Study for the Perris Valley Storm Drain Channel Widening Project, Perris, Riverside County, California*. June 10, 2020.

BFSA, 2020. Brian F. Smith and Associates, Inc. *A Phase I Cultural Resources Survey for the IDI Rider 2 & Rider 4 High Cube Warehouses and PVSD Channel Improvement Project, Perris, California*. September 25, 2020. Included in Appendix D of this EIR.

City of Perris, 2011. *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report*. November 2011, certified January 10, 2012.

4.6 ENERGY

This section evaluates the proposed Project's potential impacts to energy. This analysis addresses the proposed Project's energy consumption during construction and operation. Information presented in this Section is primarily based on the *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Energy Analysis* (Energy Analysis) prepared by Urban Crossroads (July 2020) and included in Appendix E of this EIR (Urban Crossroads, 2020). References used in preparation of this section are listed under Section 4.6.6, References.

There were no Notice of Preparation (NOP) comment letters received addressing energy issues. Additionally, at the November 6, 2019 Draft Environmental Impact Report (EIR) public scoping meeting, there were no comments from the public or the Planning Commissioners regarding the Project's potential impacts due to energy consumption.

4.6.1 EXISTING SETTING

The most recent data for California's estimated total energy consumption is from 2017 and natural gas consumption is from 2018, released by the United States (U.S.) Energy Information Administration's (EIA) California State Profile and Energy Estimates in 2020 and included:

- Approximately 7,881 trillion British Thermal Unit (BTU) of energy was consumed;
- Approximately 683 million barrels of petroleum;
- Approximately 2,137 billion cubic feet of natural gas;
- Approximately 1 million short tons of coal.

The California Energy Commission's (CEC) Transportation Energy Demand Forecast 2018-2030 was released in order to support the 2017 Integrated Energy Policy Report. The Transportation Energy Demand Forecast 2018-2030 lays out graphs and data supporting their projections of California's future transportation energy demand. The projected inputs consider expected variable changes in fuel prices, income, population, and other variables. Predictions regarding fuel demand included:

- Gasoline demand in the transportation sector is expected to decline from approximately 15.8 billion gallons in 2017 to between 12.3 billion and 12.7 billion gallons in 2030.
- Diesel demand in the transportation sector is expected to rise, increasing from approximately 3.7 billion diesel gallons in 2015 to approximately 4.7 billion in 2030.
- Data from the Department of Energy states that approximately 3.9 billion gallons of diesel fuel were consumed in 2017.

The most recent data provided by the EIA for energy use in California by demand sector is from 2017 and is reported as follows:

- Approximately 40.3% transportation;

- Approximately 23.1% industrial;
- Approximately 18.0% residential; and
- Approximately 18.7% commercial.

In 2018, total system electric generation for California was 285,488 gigawatt hours (GWh). California's massive electricity in-state generation system generated approximately 194,842 GWh which accounted for approximately 68% of the electricity it uses; the rest was imported from the Pacific Northwest (14%) and the U.S. Southwest (18%). Natural gas is the main source for electricity generation at 47% of the total in-state electric generation system power as shown in Table 4.6-1, *Total Electricity System Power (California 2018)*.

Table 4.6-1 Total Electricity System Power (California 2018)

Fuel Type	California In-State Generation (GWh)	Percent of California In-State Generation	Northwest Imports (GWh)	Southwest Imports (GWh)	California Power Mix (GWh)	Percent California Power Mix
Coal	294	0.15%	399	8,740	9,433	3.30%
Large Hydro	22,096	11.34%	7,418	985	30,499	10.68%
Natural Gas	90,691	46.54%	49	8,904	99,644	34.91%
Nuclear	18,268	9.38%	0	7,573	25,841	9.05%
Oil	35	0.02%	0	0	35	0.01%
Other	430	0.22%	0	9	439	0.15%
Renewables	63,028	32.35%	14,074	12,400	89,502	31.36%
Biomass	5,909	3.03%	772	26	6,707	2.35%
Geothermal	11,528	5.92%	171	1,269	12,968	4.54%
Small Hydro	4,248	2.18%	334	1	4,583	1.61%
Solar	27,265	13.99%	174	5,094	32,533	11.40%
Wind	14,078	7.23%	12,623	6,010	32,711	11.46%
Unspecified Sources of Power	N/A	N/A	17,576	12,519	30,095	10.54%
Total	194,842	100%	39,517	51,130	285,488	100%

Source: (Urban Crossroads, 2020)

An updated summary of, and context for energy consumption and energy demands within the State is presented in "U.S. Energy Information Administration, California State Profile and Energy Estimates, Quick Facts" excerpted below:

- California was the seventh-largest producer of crude oil among the 50 states in 2018, and, as of January 2019, it ranked third in oil refining capacity.
- California is the largest consumer of jet fuel among the 50 states and accounted for one-fifth of the nation's jet fuel consumption in 2018.
- California's total energy consumption is second-highest in the nation, but, in 2018, the State's per capita energy consumption was the fourth-lowest, due in part to its mild climate and its energy efficiency programs.

- In 2018, California ranked first in the nation as a producer of electricity from solar, geothermal, and biomass resources and fourth in the nation in conventional hydroelectric power generation.
- In 2018, large- and small-scale solar photovoltaic (PV) and solar thermal installations provided 19% of California's net electricity generation.

As indicated above, California is one of the nation's leading energy-producing states, and California's per capita energy use is among the nation's most efficient.

Electricity

The usage associated with electricity use were calculated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2. The Southern California region's electricity reliability has been of concern for the past several years due to the planned retirement of aging facilities that depend upon once-through cooling technologies, as well as the June 2013 retirement of the San Onofre Nuclear Generating Station (San Onofre). While the once-through cooling phase-out has been ongoing since the May 2010 adoption of the State Water Resources Control Board's once-through cooling policy, the retirement of San Onofre complicated the situation. California ISO studies had revealed the extent to which the South Coast Air Basin (SoCAB) and the San Diego Air Basin (SDAB) region were vulnerable to low-voltage and post-transient voltage instability concerns. A preliminary plan to address these issues was detailed in the 2013 Integrative Energy Policy Report (IEPR) after a collaborative process with other energy agencies, utilities, and air districts. Similarly, the 2018 and 2019 IEPR's identify broad strategies that are aimed at maintaining electricity system reliability.

Electricity is provided to the Project by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons in 15 counties and in 180 incorporated cities, within a service area encompassing approximately 50,000 square miles. Based on SCE's 2018 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases from independent power producers and utilities, including out-of-state suppliers.

California's electricity industry is an organization of traditional utilities, private generating companies, and State agencies, each with a variety of roles and responsibilities to ensure that electrical power is provided to consumers. The California Independent Service Operator (ISO) is a nonprofit public benefit corporation and is the impartial operator of the State's wholesale power grid and is charged with maintaining grid reliability, and to direct uninterrupted electrical energy supplies to California's homes and communities. While utilities (such as SCE) still own transmission assets, the ISO routes electrical power along these assets, maximizing the use of the transmission system and its power generation resources. The ISO matches buyers and sellers of electricity to ensure that enough power is available to meet demand. To these ends, every five minutes the ISO forecasts electrical demands, accounts for operating reserves, and assigns the lowest cost power plant unit to meet demands while ensuring adequate system transmission capacities and capabilities.

Part of the ISO's charge is to plan and coordinate grid enhancements to ensure that electrical power is provided to California consumers. To this end, transmission owners (investor-owned utilities such as SCE) file annual transmission expansion/modification plans to accommodate the State's growing electrical needs. The ISO reviews and either approves or denies the proposed additions. In addition, and

perhaps most importantly, the ISO works with other areas in the western United States electrical grid to ensure that adequate power supplies are available to the State. In this manner, continuing reliable and affordable electrical power is assured to existing and new consumers throughout the State.

Table 4.6-2, *SCE 2018 Power Content Mix*, identifies SCE's specific proportional shares of electricity sources in 2018. As indicated in Table 4.6-2, the 2018 SCE Power Mix has renewable energy at 36% of the overall energy resources. Geothermal resources are at 8%, wind power is at 13%, large hydroelectric sources are at 1%, solar energy is at 13%, and coal is at 0%. Biomass and waste sources have increased by 1% since 2017. Natural gas remains at 17% since 2017.

Table 4.6-2 SCE 2018 Power Content Mix

Energy Resources	2018 SCE Power Mix
Eligible Renewable	36%
Biomass & waste	1%
Geothermal	8%
Small Hydroelectric	1%
Solar	13%
Wind	13%
Coal	0%
Large Hydroelectric	4%
Natural Gas	17%
Nuclear	6%
Other	0%
Unspecified Sources of power*	37%
Total	100%

* "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources
 Source: (Urban Crossroads, 2020)

Natural Gas

The usage associated with natural gas use were calculated using the CalEEMod Version 2016.3.2. The following summary of natural gas customers & volumes, supplies, delivery of supplies, storage, service options, and operations is excerpted from information provided by the California Public Utilities Commission (CPUC).

The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from Pacific Gas and Electric (PG&E), Southern California Gas (SoCalGas), San Diego Gas & Electric (SDG&E), Southwest Gas, and several smaller natural gas utilities. The CPUC also regulates independent storage operators: Lodi Gas Storage, Wild Goose Storage, Central Valley Storage and Gill Ranch Storage.

California's natural gas utilities provide service to over 11 million gas meters. SoCalGas and PG&E provide service to about 5.9 million and 4.3 million customers, respectively, while SDG&E provides service to over 800,000 customers. In 2018, California gas utilities forecasted that they

would deliver about 4,740 million cubic feet per day (MMcfd) of gas to their customers, on average, under normal weather conditions.

The overwhelming majority of natural gas utility customers in California are residential and small commercial customers, referred to as "core" customers. Larger volume gas customers, like electric generators and industrial customers, are called "noncore" customers. Although very small in number relative to core customers, noncore customers consume about 65% of the natural gas delivered by the state's natural gas utilities, while core customers consume about 35%.

A significant amount of gas (about 19%, or 1,131 MMcfd, of the total forecasted California consumption in 2018) is also directly delivered to some California large volume consumers, without being transported over the regulated utility pipeline system. Those customers, referred to as "bypass" customers, take service directly from interstate pipelines or directly from California producers.

Natural gas from out-of-state production basins is delivered into California via the interstate natural gas pipeline system. The gas transported to California gas utilities via the interstate pipelines, as well as some of the California-produced gas, is delivered into the PG&E and SoCalGas intrastate natural gas transmission pipelines systems (commonly referred to as California's "backbone" pipeline system). Natural gas on the utilities' backbone pipeline systems is then delivered to the local transmission and distribution pipeline systems, or to natural gas storage fields.

PG&E and SoCalGas own and operate several natural gas storage fields that are located within their service territories in northern and southern California, respectively. These storage fields provide a significant amount of infrastructure capacity to help meet California's natural gas requirements, and without these storage fields, California would need much more pipeline capacity in order to meet peak gas requirements.

Prior to the late 1980s, California regulated utilities provided virtually all natural gas services to all their customers. Since then, the Commission has gradually restructured the California gas industry in order to give customers more options while assuring regulatory protections for those customers that wish to, or are required to, continue receiving utility-provided services. The option to purchase natural gas from independent suppliers is one of the results of this restructuring process. Although the regulated utilities procure natural gas supplies for most core customers, core customers have the option to purchase natural gas from independent natural gas marketers, called "core transport agents" (CTA). Noncore customers, on the other hand, make natural gas supply arrangements directly with producers or with marketers.

Another option resulting from the restructuring process occurred in 1993, when the Commission removed the utilities' storage service responsibility for noncore customers, along with the cost of this service from noncore customers' transportation rates. The Commission also encouraged the development of independent storage fields, and in subsequent years, all the independent storage fields in California were established. Noncore customers and marketers may now take storage service from the utility or from an independent storage provider (if available), and pay for that service, or may opt to take no storage service at all. For core customers, the Commission assures

that the utility has adequate storage capacity set aside to meet core requirements, and core customers pay for that service.

In a 2006 decision, the Commission adopted a gas transmission framework for Southern California called the "firm access rights" system. SoCalGas and SDG&E implemented the firm access rights (FAR) system in 2008, and it is now referred to as the backbone transmission system (BTS) framework. SoCalGas backbone transmission costs are unbundled from noncore transportation rates. Noncore customers and marketers may obtain, and pay for, firm backbone transmission capacity at various receipt points on the SoCalGas system. A certain amount of backbone transmission capacity is obtained for core customers to assure meeting their requirements.

Many if not most noncore customers now use a marketer to provide for several of the services formerly provided by the utility. Core customers still mainly rely on the utilities for procurement service, but they have the option to take procurement service from a CTA. Backbone transmission and storage capacity is either set aside or obtained for core customers in amounts to assure very high levels of service.

In order properly operate their natural gas transmission pipeline and storage systems, PG&E and SoCalGas must balance the amount of gas received into the pipeline system and delivered to customers or to storage fields. Some of these utilities' storage capacity is dedicated to this service, and under most circumstances, customers do not need to precisely match their deliveries with their consumption. However, when too much or too little gas is expected to be delivered into the utilities' systems, relative to the amount being consumed, the utilities require customers to more precisely match up their deliveries with their consumption. And, if customers do not meet certain delivery requirements, they could face financial penalties. The utilities do not profit from these financial penalties - the amounts are then returned to customers as a whole. If the utilities find that they are unable to deliver all the gas that is expected to be consumed, they may even call for a curtailment of some gas deliveries. These curtailments are typically required for just the largest, noncore customers. It has been many years since there has been a significant curtailment of core customers in California."

As indicated in the preceding discussions, natural gas is available from a variety of in-state and out-of-state sources and is provided throughout the state in response to market supply and demand. Complementing available natural gas resources, biogas may soon be available via existing delivery systems, thereby increasing the availability and reliability of resources in total. The PUC oversees utility purchases and transmission of natural gas to ensure reliable and affordable natural gas deliveries to existing and new consumers throughout the State.

Transportation Energy Resources

The Project would generate additional vehicle trips with resulting consumption of energy resources, predominantly gasoline and diesel fuel. In March 2019, the Department of Motor Vehicles (DMV) identified 36.4 million registered vehicles in California, and those vehicles consume an estimated 17.8 billion gallons of fuel each year. Gasoline (and other vehicle fuels) are commercially provided commodities and would be available to the Project patrons and employees via commercial outlets.

California's on-road transportation system includes 394,383 land miles, more than 27.5 million passenger vehicles and light trucks, and almost 8 million medium- and heavy-duty vehicles. While gasoline consumption has been declining since 2008, it is still by far the dominant fuel. Petroleum comprises about 91% of all transportation energy use, excluding fuel consumed for aviation and most marine vessels. Nearly 17.8 billion gallons of on-highway fuel are burned each year, including 14.6 billion gallons of gasoline (including ethanol) and 3.9 billion gallons of diesel fuel (including biodiesel and renewable diesel). In 2019, Californians also used 194 cubic feet of natural gas as a transportation fuel, or the equivalent of 183 billion gallons of gasoline.

4.6.2 EXISTING POLICIES AND REGULATIONS

Federal

Intermodal Surface Transportation Efficiency Act (ISTEA)

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions. The applicable MPO for the City of Perris is the SCAG. SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is the applicable planning document for the area.

Transportation Equity Act for the 21st Century (TEA-21)

The TEA-21 was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety.

State

Integrated Energy Policy Report

Senate Bill 1389 (Bowen, Chapter 568, Statutes of 2002) requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State's economy; and protect public health and safety (Public Resources Code § 25301a). The CEC prepares these assessments and associated policy recommendations every two years, with updates on alternate years, as part of the Integrated Energy Policy Report (IEPR).

The 2019 IEPR was adopted January 31, 2020, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2019 IEPR focuses on a variety of topics such as including the environmental performance of the electricity generation system, landscape-scale planning, the response to the gas leak at the Aliso Canyon natural gas storage facility, transportation fuel supply reliability issues, updates on Southern California electricity reliability, methane leakage, climate adaptation activities for the energy sector, climate and sea level rise scenarios, and the California Energy Demand Forecast. The 2020 IEPR Update is currently in progress but is not anticipated to be adopted until February 2021.

State of California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies several strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

California Code Title 24, Part 6, Energy Efficiency Standards

California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas (GHG) emissions. The 2019 version of Title 24 was adopted by the CEC and will become effective on January 1, 2020. The 2019 Title 24 standards go into effect on January 1, 2020 and are applicable to building permit applications submitted on or after that date. The 2019 Title 24 standards require solar photovoltaic (PV) systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, update indoor and outdoor lighting for nonresidential buildings. The CEC anticipates that single-family homes built with the 2019 standards will use approximately 7% less energy compared to the residential homes built under the 2016 standards. Additionally, after implementation of solar PV systems, homes built under the 2019 standards will about 53% less energy than homes built under the 2016 standards. Nonresidential buildings will use approximately 30% less energy due to lighting upgrades compared to the prior code.

AB 1493 Pavley Regulations and Fuel Efficiency Standards

California AB 1493, enacted on July 22, 2002, required ARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks). Although aimed at reducing GHG emissions, specifically, a co-benefit of the Pavley standards is an improvement in fuel efficiency and consequently a reduction in fuel consumption.

California Renewable Portfolio Standards (SB 1078)

First established in 2002 under Senate Bill (SB) 1078, California's Renewable Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable resources to 33 percent of total retail sales by 2020. In October 2015, the legislature approved, and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the renewables portfolio standard (RPS), higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Provisions for a 50 percent reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the California Energy Commission (CEC), and local publicly-owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States

4.6.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on energy if it will:

- a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation.
- b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

4.6.4 ENVIRONMENTAL IMPACTS

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

There are no Standards and Guidelines or MMs specifically related to energy included in the PVCCSP. The PVCCSP EIR includes several mitigation measures related to energy consumption, which were adopted to address air quality impacts. As a conservative measure, to provide a worst-case disclosure of the Project's impacts, no credit has been assumed from the following measures.

MM Air 19 *In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g., electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the project site.*

These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris' Building Division) prior to conveyance of applicable streets.

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

Impact Analysis

Threshold a **Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?**

The Project would result in the demand for energy resources during both construction and long-term operation, as discussed below. Information from the California Emissions Estimator Model™ (CalEEMod) 2016.3.2 outputs and information provided by the Project Applicant used in the Project's Air Quality Impact Analysis (AQIA) (included in Appendix B of this EIR) was utilized in the analysis of the Project's energy consumption, which detail Project-related construction equipment, transportation energy demands, and facility energy demands. Refer to Section 4.3.3 in the Air Quality Section of this EIR for a discussion of modeling inputs used in the analysis; a description of the anticipated construction schedule and a list of expected construction equipment is provided in Section 3.6.3, Construction Activities, of this EIR.

Construction Energy Demands

Construction Equipment Electricity Usage Estimates

Based on the 2017 National Construction Estimator, the typical power cost per 1,000 square feet of construction per month is estimated to be \$2.32. For purposes of analysis, it is assumed that Project involves 1,373,449 sf¹ of High-Cube Transload Short-Term Storage Warehouse (without cold storage) and includes improvement to and ongoing maintenance of the PVSD Channel. The total power cost of the on-site electricity usage during the construction of the Project is estimated to be approximately \$111,577.26 with the one-stage bridge construction and \$135,588.93 with the two-stage bridge construction), as shown in Tables 4-6 and 4-7 of the Project's Energy Analysis (in Appendix E of this EIR). As of January 1, 2020, SCE's general service rate is \$0.08 per kilowatt hours (kWh) of electricity for industrial services. As shown on Tables 4-8 and 4-9 of the Project's Energy Analysis, the total electricity usage from on-site Project construction-related activities is estimated to be approximately 1,394,716 kWh with the one-stage bridge construction scenario and 1,694,862 kWh with the two-stage bridge construction scenario.

¹ This analysis is based on an anticipated maximum building square footage of 1,373,449 sf as presented in the NOP for this EIR and consistent with the Project description at the time the Energy Analysis was initiated. However, the site plans for the Rider 2 and Rider 4 buildings were subsequently revised resulting in a reduction in the anticipated maximum building square footage (currently proposed to be 1,352,736 sf). The higher square footages for Rider 2 and Rider 4 have been evaluated for the purposes of this Energy Analysis in order to account for any minor changes that may occur to the building area as part of the final design.

Construction Equipment Fuel Estimates

Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. Project construction activity timeline estimates, construction equipment schedules, equipment power ratings, load factors, and associated fuel consumption estimates are presented in Tables 4-10 and 4-11 of the Project's Energy Analysis. The duration of construction activity was based on information provided by the Project Applicant and the opening year. The associated construction equipment was generally based on CalEEMod defaults. Eight-hour daily use of all equipment is assumed. The aggregate fuel consumption rate for all equipment is estimated at 18.5 horsepower hour per gallon (hp-hr-gal), obtained from CARB 2018 Emissions Factors Tables and cited fuel consumption rate factors presented in Table D-24 of the Moyer guidelines. For the purposes of this analysis, the calculations are based on all construction equipment being diesel-powered which is standard practice consistent with industry standards. Diesel fuel would be supplied by existing commercial fuel providers serving the City and region.

As presented in Table 4-10 and Table 4-11 of the Project's Energy Analysis, Project construction activities would consume an estimated 122,511 gallons of diesel fuel for the one-stage bridge construction scenario and 130,265 gallons of diesel fuel for the two-stage bridge construction scenario. Project construction would represent a "single-event" diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose.

Construction Worker Fuel Estimates

With respect to estimated VMT for the Project, the construction worker trips would generate an estimated 2,475,612 VMT with the one-stage bridge construction and 4,885,486 VMT with the two-stage bridge construction. Data regarding Project-related construction worker trips were based on CalEEMod defaults utilized within the AQIA included in Appendix B of this EIR. As generated by EMFAC2017, an aggregated fuel economy of (light-duty autos) LDAs ranging from model year 1974 to model years 2020 and 2021 are estimated to have fuel efficiencies of 31.03 miles per gallon (mpg) and 31.83 mpg, respectively. Table 4-12 and Table 4-13 in the Project's Energy Analysis provide an estimated annual fuel consumption resulting from Project-related construction worker trips. It is estimated that 38,847 gallons of fuel would be consumed with the one-stage bridge construction and 76,695 gallons of fuel would be consumed with the two-stage bridge construction related to construction worker trips during full construction of the Project.

The EMFAC2017 aggregated fuel economy of light-duty trucks² (LDT1s) ranging from model year 1974 to model years 2020 and 2021 are estimated to have fuel efficiencies of 26.10 mpg and 26.78 mpg, respectively. Table 4-14 and Table 4-15 of the Project's Energy Analysis provide an estimated annual fuel consumption resulting from LDT1s related to the Project construction worker trips. It is estimated that 23,149 gallons of fuel would be consumed with the one-stage bridge construction and 45,656 gallons of fuel would be consumed with the two-stage bridge construction related to construction worker trips during full construction of the Project.

² Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.

The EMFAC2017 aggregated fuel economy of LDT2s³ ranging from model year 1974 to model years 2020 and 2021 are estimated to have fuel efficiencies of 24.25 mpg and 25.09 mpg, respectively. Table 4-16 and Table 4-17 of the Project's Energy Analysis provide an estimated annual fuel consumption resulting from LDT2s related to the Project construction worker trips. It is estimated that 24,708 gallons of fuel would be consumed with the one-stage bridge construction and 48,729 gallons of fuel would be consumed with the two-stage bridge construction related to construction worker trips during full construction of the Project.

It should be noted that construction worker trips would represent a "single-event" gasoline fuel demand and would not require on-going or permanent commitment of fuel resources for this purpose.

Construction Vendor Fuel Estimates

With respect to estimated VMT, the construction vendor trips would generate an estimated 396,391 VMT with the one-stage bridge construction and 856,097 VMT with the two-stage bridge construction. As generated by EMFAC2017, an aggregated fuel economy of (medium-heavy duty trucks (MHDTs) and heavy-heavy duty trucks (HHDTs) ranging from model year 1974 to model years 2021 are estimated to have fuel efficiency of 10.02 mpg. As shown on Table 4-18 and Table 4-19 of the Project's Energy Analysis, it is estimated that 19,779 gallons of fuel would be consumed with the one-stage bridge construction and 42,716 gallons of fuel would be consumed with the two-stage bridge construction related to construction vendor trips (MHDTs) during full construction of the Project. Table 4-20 and Table 4-21 of the Project's Energy Analysis show the estimated fuel economy of HHDTs accessing the Project sites. It is estimated that 28,782 gallons of fuel would be consumed with the one-stage bridge construction and 62,162 gallons of fuel would be consumed with the two-stage bridge construction related to construction vendor trips (HHDTs) during full construction of the Project. It should be noted that Project construction vendor trips would represent a "single-event" diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources for this purpose.

Construction Energy Efficiency/Conservation Measures

The equipment used for Project construction would conform to CARB regulations and California emissions standards. There are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

The Project would utilize construction contractors which practice compliance with applicable CARB regulations regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption.

³ Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

Additionally, certain incidental construction-source energy efficiencies would likely accrue through implementation of California regulations and best available control measures (BACM). More specifically, CCR Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. This requirement would be enforced pursuant to PVCCSP EIR mitigation measure MM Air 4 (refer to Section 4.3, Air Quality, of this EIR). In this manner, construction equipment operators are informed that engines are to be turned off at or prior to five minutes of idling. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints.

Indirectly, construction energy efficiencies and energy conservation would be achieved for the proposed development through energy efficiencies realized from bulk purchase, transport and use of construction materials.

A full analysis related to the energy needed to form construction materials is not included in this analysis due to a lack of detailed Project-specific information on construction materials. At this time, an analysis of the energy needed to create Project-related construction materials would be extremely speculative and thus has not been prepared.

In general, the construction processes promote conservation and efficient use of energy by reducing raw materials demands, with related reduction in energy demands associated with raw materials extraction, transportation, processing and refinement. Use of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations.

Operational Energy Demands

Energy consumption in support of or related to Project operations would include transportation energy demands (energy consumed by resident, employee, and patron vehicles accessing the Project area) and facilities energy demands (energy consumed by building operations and site maintenance activities).

Transportation Energy Demands

Energy that would be consumed by Project-generated traffic is a function of total VMT and estimated vehicle fuel economies of vehicles accessing the Project area.

- **Light-Duty Autos (LDAs).** With respect to estimated VMT, and based on the trip frequency and trip length methodologies cited in the Project's AQIA (Appendix B of this EIR), the Project would generate an estimated 8,004,286 annual VMT along area roadways for all LDAs with full build-out of the Project. Table 4-22 of the Project's Energy Analysis provides an estimated range of annual fuel consumption resulting from Project generated LDAs. It is estimated that 251,462 gallons of fuel would be consumed from Project generated LDA trips.
- **Light-Duty Trucks (LDTs).** With respect to estimated VMT, and based on the trip frequency and trip length methodologies cited in the Project's AQIA, the Project would generate an estimated 557,991 annual VMT along area roadways for all LDT1 vehicles with full build-out of the Project.

Table 4-23 of the Project's Energy Analysis provides an estimated range of annual fuel consumption resulting from Project generated LDT1s. It is estimated that 20,840 gallons of fuel would be consumed from Project generated LDT1 trips. Additionally, the Project would generate an estimated 2,732,232 annual VMT along area roadways for all LDT2 vehicles with full build-out of the Project. Table 4-24 of the Project's Energy Analysis provides an estimated range of annual fuel consumption resulting from Project generated LDT2s. It is estimated that 108,905 gallons of fuel would be consumed from Project generated LDT2 trips.

- **Medium-Duty Trucks (MDTs).** With respect to estimated VMT, and based on the trip frequency and trip length methodologies cited in the Project's AQIA, the Project would generate an estimated 1,750,938 annual VMT along area roadways for all Medium-Duty Trucks (MDV) vehicles with full build-out of the Project. Table 4-25 of the Project's Energy Analysis provides an estimated range of annual fuel consumption resulting from Project generated MDVs. It is estimated that 87,209 gallons of fuel would be consumed from Project generated MDV trips.
- **Light-Heavy Duty Trucks (LHDTs).** With respect to estimated VMT, and based on the trip frequency and trip length methodologies cited in the Project's AQIA, the Project would generate an estimated 1,039,018 annual VMT along area roadways for all Light-Heavy-Duty Trucks (LHDT1)⁴ vehicles with full build-out of the Project. Table 4-26 of the Project's Energy Analysis provides an estimated range of annual fuel consumption resulting from Project generated LHDT1s. It is estimated that 73,048 gallons of fuel would be consumed from Project generated LHDT1 trips.
- **Medium-Heavy Duty Trucks (MHDTs).** With respect to estimated VMT, and based on the trip frequency and trip length methodologies cited in the Project's AQIA, the Project would generate an estimated 1,269,911 annual VMT along area roadways for all MHDTs with full build-out of the Project. Table 4-27 of the Project's Energy Analysis provides an estimated range of annual fuel consumption resulting from Project generated MHDTs. It is estimated that 126,728 gallons of fuel would be consumed from Project generated MHDT trips.
- **Heavy-Heavy Duty Trucks (HHDTs).** With respect to estimated VMT, and based on the trip frequency and trip length methodologies cited in the Project's AQIA, the Project would generate an estimated 3,886,697 annual VMT along area roadways for all HHDTs with full build-out of the Project. Table 4-28 of the Project's Energy Analysis provides an estimated range of annual fuel consumption resulting from Project generated HHDTs. It is estimated that 564,429 gallons of fuel would be consumed from Project generated HHDT trips.

As summarized on Table 4.6-3, *Total Project-Generated Traffic Annual Fuel Consumption (All Vehicles)*, the Project would result in 19,241,072 annual VMT and an estimated annual fuel consumption of 1,232,621 gallons of fuel.

⁴ Vehicles under the LHDT1 category have a GVWR of 8,501 to 10,000 lbs.

Table 4.6-3 Total Project-Generated Traffic Annual Fuel Consumption (All Vehicles)

Vehicle Type	Annual VMT	Estimated Annual Fuel Consumption (gallons)
LDA	8,004,286	251,462
LDT1	557,991	20,840
LDT2	2,732,232	108,905
MDV	1,750,938	87,209
LHDT	1,039,018	73,048
MHDT	1,269,911	126,728
HHDT	3,886,697	564,429
Total (All Vehicles)	19,241,072	1,232,621

Source: (Urban Crossroads, 2020)

Facility Energy Demands

Project building operations and Project area maintenance activities would result in the consumption of electricity. Electricity would be supplied to the Project by SCE. Annual electricity demands of the Project are summarized in Table 4.6-4, *Project Annual Operational Energy Demand Summary*.

Table 4.6-4 Project Annual Operational Energy Demand Summary

Electricity Demand	kWh/year
Other Asphalt Surfaces	0
Other Non-Asphalt Surfaces	0
Parking Lot	71,960
Rider 2 and 4 Warehouse	2,609,550
Total Project Electricity Demand	2,681,510

kWh/year – kilo-watt hours per year
 Source: (Urban Crossroads, 2020)

Based on information provided by the Project Applicant, the Project would not require natural gas for operations and no natural gas infrastructure would be installed as part of the Project. As such, emissions associated with natural gas use were excluded from the analysis.

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building such as in plug-in appliances. In California, the California Building Standards Code Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. Non-building energy use, or “plug-in” energy use can be further subdivided by specific end-use (refrigeration, cooking, appliances, etc.).

Operational Energy Efficiency/Conservation Measures

Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent State and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards; and enhanced building/utilities energy efficiencies mandated under California building codes

(e.g., Title 24, California Green Building Standards Code). It should also be noted that the Project would not result in a substantial increase in demand or transmission service, resulting in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure because it would be served by the existing electric utility lines in the Project vicinity.

Project annual fuel consumption estimates presented previously in Table 4.6-3 represent likely potential maximums that would occur for the Project. Enhanced fuel economies realized pursuant to federal and State regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. The Project Applicant would construct sidewalks, facilitating and encouraging pedestrian access. Facilitating pedestrian and bicycle access would reduce VMT and associated energy consumption. In compliance with the California Green Building Standards Code, the Project would promote the use of bicycles as an alternative mean of transportation by providing short-term and/or long-term bicycle parking accommodations. As supported by the preceding discussions, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Conclusion

As supported by the preceding analyses, Project construction and operations would not result in the inefficient, wasteful or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservation goals within the State of California. As such, the Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during Project construction or operation. Thus, impacts would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Threshold b Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The Project would be subject to applicable PVCCSP EIR mitigation measures (mitigation measures MM Air 19 and MM Air 20) that would serve to reduce the Project's level of energy consumption. Further, the Project is subject to current California Building Code requirements, and must comply with the 2019 Building and Energy Efficiency Standards. Thus, the Project would not conflict with such plans, and no impact would occur. Additionally, and as discussed below, the Project would be consistent with or otherwise would not conflict with State or local plans related to energy conservation. Federal plans are also discussed for informational purposes.

- **ISTEA.** Transportation and access to the Project area is provided by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because SCAG is not planning for intermodal facilities on or through the Project area.
- **TEA-21.** The Project area is located along major transportation corridors with proximate access to the Interstate freeway system. The sites selected for the Project facilitate access, act to reduce vehicle miles traveled (VMT), take advantage of existing infrastructure systems, and promote land use compatibilities through collocation of similar uses. The Project supports the strong planning processes emphasized under TEA-21. The Project is therefore consistent with, would not otherwise interfere with, and would not obstruct implementation of TEA-21.
- **IEPR.** Electricity would be provided to the Project by SCE. SCE's Clean Power and Electrification Pathway (CPEP) white paper builds on existing state programs and policies. As such, the Project is consistent with, and would not otherwise interfere with, nor obstruct implementation the goals presented in the 2019 IEPR. It should also be noted that based on information provided by the Project Applicant, the Project would not require natural gas for operations and no natural gas infrastructure would be installed as part of the Project. As such, emissions associated with natural gas use were excluded from the analysis and no impacts to natural gas usage would occur.
- **State of California Energy Plan.** The Project area is located along major transportation corridors with proximate access to the Interstate freeway system. The sites selected for the Project facilitates access, acts to reduce VMT by developing industrial uses on a light industrial park-designated site. The Project therefore is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan.
- **California Code, Title 24, Part 6, Energy Efficiency Standards.** The 2019 version of Title 24 was adopted by the California Energy Commission (CEC) and became effective on January 1, 2020. Adherence with the current (2019) Title 24 energy efficiency standards is required and has been assumed in this energy analysis for the Project.
- **AB 1493 Pavley Regulations and Fuel Efficiency Standards.** AB 1493 is not applicable to the Project as it is a statewide measure establishing vehicle emissions standards. No feature of the Project would interfere with implementation of the requirements under AB 1493.
- **California's RPS.** California's RPS is not applicable to the Project as it is a statewide measure that establishes a renewable energy mix. No feature of the Project would interfere with implementation of the requirements under RPS.
- **SB 350 – Clean Energy and Pollution Reduction Act of 2015.** This measure is not directly applicable to development projects, but the proposed Project would use energy from Southern California Edison, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. As such, the Project would not conflict with SB 350.

Conclusion

Based on the preceding analysis, the Project would not conflict with any adopted State or local plans for renewable energy or energy efficiency. Impacts due to a conflict with or obstruction of a State or local plan for renewable energy efficiency would therefore be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

4.6.5 CUMULATIVE IMPACTS

Project construction and operations would not result in the inefficient, wasteful or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservation goals within the State of California. Other cumulative developments within the region would similarly be required to demonstrate that the wasteful, inefficient, or unnecessary consumption of energy would not occur. Additionally, other cumulative developments would be subject to the same regulatory requirements as the proposed Project, including compliance with the 2019 Title 24 Building and Energy Efficiency Standards, which would ensure that cumulative development does not result in the wasteful, inefficient, or unnecessary consumption of energy. As such, the Project would not result in a potentially cumulatively-considerable environmental impact due to wasteful, inefficient, or unnecessary consumption of energy. Thus, impacts would be less-than-cumulatively considerable.

There are no adopted State or local plans for renewable energy or energy efficiency in the Project area. Further, the proposed Project and other cumulative developments are subject to current California Building Code requirements and must comply with the 2019 Building and Energy Efficiency Standards and the 2019 California Green Building Standards requirements. The Project and other cumulative developments also inherently would be consistent with the IEPR, State of California Energy Plan, Title 24 Energy Efficiency Standards, AB 1493 (Pavley), and SB 350, as discussed herein. As such, impacts due to a conflict with or obstruction of a State or local plan for renewable energy or energy efficiency would be less-than-cumulatively considerable.

4.6.6 REFERENCES

Urban Crossroads, 2020. *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project – Energy Analysis*. July 22, 2020. Included in Appendix E of this EIR.

4.7 GEOLOGY AND SOILS

This section describes the existing geology and soils within the Project area and analyzes the potential impacts of existing geotechnical hazards that may adversely affect the Project or may be exacerbated by Project implementation. The analysis in this section is based primarily on the following site-specific technical reports prepared for the Project, which are included in Appendix F and Appendix G of this Environmental Impact Report (EIR), and on information included in the Perris Valley Commerce Center Specific Plan Final EIR (PVCCSP Final EIR) (City of Perris, 2011), which is incorporated by reference. All references used in this Section are listed in Section 4.7.6, References.

- *Geotechnical Investigation Rider 2 – Proposed Commercial/Industrial Building, NEC Redlands Avenue and Rider Street, Perris, California* (Rider 2 Geotechnical Investigation), prepared by Southern California Geotechnical (SCG) (September 9, 2019) (Appendix F)
- *Geotechnical Investigation Rider 4 – Proposed Commercial/Industrial Building, SEC Redlands Avenue at Morgan Street, Perris, California* (Rider 4 Geotechnical Investigation), prepared by SCG (September 9, 2019) (Appendix F)
- *Preliminary Environmental Issues – Proposed Bridge Widening (October 28, 2019)*, prepared by SCG (Appendix F)
- *Results of Infiltration Testing Rider 2 – Proposed Commercial/Industrial Building, NEC Redlands Avenue and Rider Street, Perris, California*, prepared by SCG (November 22, 2017) (Appendix F)
- *Results of Infiltration Testing Rider 4 – Proposed Commercial/Industrial Building, NEC Redlands Avenue at Morgan Street, Perris, California*, prepared by SCG (November 30, 2017) (Appendix F)
- *Paleontological Resource and Mitigation Monitoring Assessment, IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project, City of Perris, Riverside County, California* (Paleontological Assessment), prepared by Brian F. Smith and Associates (BFSA) (September 24, 2020) (Appendix G)

There were no comments received on the Notice of Preparation or at the November 6, 2019 EIR public scoping meeting regarding geology and soils.

4.7.1 EXISTING SETTING

Regional Geology

Section 4.5, Geology and Soils, of the PVCCSP EIR, includes a discussion of the regional geology for the PVCCSP area, which includes the Project area. The PVCCSP area is located within the Perris Block within the Peninsular Ranges geomorphic province of southern California. Fault zones in this range are characterized by a northwest-southeast trending which separate elongated structural blocks. The Perris Block is underlain with rocks of the Peninsular Ranges batholiths. This contains a very large mass of crystalline igneous rocks of Cretaceous age and pre-batholithic metasedimentary and metavolcanic rocks of older ages. The Perris Block is bound on the northeast by the San Jacinto Fault, on the north by the

Cucamonga Fault and the San Gabriel Mountains, and on the southwest by the Elsinore Fault and the Santa Ana Mountains.

Local Geology

As required by PVCCSP EIR mitigation measure MM Geo 1 presented below, geotechnical investigations of the Rider 2 and Rider 4 building sites were conducted, and are included in Appendix F. The geotechnical investigations included a visual site reconnaissance, subsurface exploration, field and laboratory testing, and geotechnical engineering analysis to provide criteria for Project design. A total of 22 borings were advanced to depths of approximately 5 to 50 feet below existing site grades (12 borings for the Rider 2 site and 10 borings for the Rider 4 site).

Native alluvial soils were encountered at the ground surface at each of the boring locations. The alluvium underlying the Rider 2 site varies widely in composition and strength, generally consisting of stiff to very stiff silty clays and clayey silts as well as loose to dense silty sands and fine sandy silts. These interbedded layers of sands, silts and clays, generally extend to at least the maximum depth explored of approximately 50 feet. The alluvial soils generally become denser and stiffer with depth. Borings encountered medium dense to very dense clayey sands and silty sands as well as very stiff to hard silty clays and clayey silts below depths of approximately 15 to 20 feet. (SCG, 2019a) The near-surface alluvium underlying the Rider 4 site generally consists of loose to medium dense silty fine sands and fine sandy silts, extending to depths of approximately 3 to 12 feet. At greater depths, the alluvium generally consists of stiff to very stiff silty clays and clayey silts. Interbedded layers of medium dense to dense sandy silts and silty sands as well as stiff to very stiff silty clays and clayey silts extend to at least the maximum depth explored of approximately 50 feet. Most of the alluvial soils possess elevated moisture contents. However, the elevated moisture contents appear to be primarily due to the mineralogy of the soils, as many of these soils possessed damp to moist apparent moisture contents (SCG, 2019b).

Groundwater

Groundwater was encountered at a depth of approximately 33 feet at the Rider 2 site, and 34 feet at the Rider 4 site. Based on the water level measurements and the moisture contents of the recovered soil samples, the static groundwater table is considered to have existed at these depth below existing site grades at the time of the subsurface investigations. Based on data from a monitoring well located approximately 0.9 mile from the Rider 2 site and 0.75 mile from the Rider 4 site, a high groundwater depth of approximately 26 feet was reported and is considered to be conservative with respect to recent site conditions. It is expected that similar soil conditions underlie the PVSD Channel and Rider Street bridge.

Faulting and Seismicity

The Project area is not located within an Alquist-Priolo Earthquake Fault Zone, and SCG did not identify any evidence of faulting during the geotechnical investigations (SCG, 2019a; SCG, 2019b; SCG, 2019c). However, as with all of Southern California, the Project area lies in a seismically active region. The nearest active earthquake fault to the Project area is the San Jacinto Valley fault zone, located approximately 8.7 miles northeast of the area (RCIT, 2020). The maximum credible magnitude earthquake for the San Jacinto Valley fault is 6.9 (City of Perris, 2016).

Topography

The Project area is relatively flat and does not contain, nor is it adjacent to, any steep natural or manufactured slopes. The Rider 2 site generally slopes downward to the east-southeast at an estimated gradient of less than 1 percent. The maximum Rider 2 site elevation is approximately 1,445 feet mean sea level (msl) located in the northwestern corner of the site, and the minimum site elevation is approximately 1,441 feet msl in the southeastern corner of the site. The Rider 4 site generally slopes downward to the southeast also at an estimated gradient of less than 1 percent. The maximum Rider 4 site elevation is 1,448 feet msl located in the northwestern corner of the site, and the minimum site elevation is 1,443 feet msl in the southeastern corner of the site. The elevation of the Perris Valley Storm Drain (PVSD) Channel ranges from 1,432 feet msl to 1,446 feet msl. The topography at Rider Street bridge is relatively flat with an elevation at approximately 1,440 feet msl.

Paleontological Resources

As previously identified, a Paleontological Assessment was prepared for the Project and is included in Appendix G of this EIR. Based on a previous paleontological literature review and a collections and records search conducted by the Geological Sciences Division of the San Bernardino County Museum (SBCM) in Redlands, California for the Stratford Ranch Project (located north of the Project area in the City of Perris), as well as another for a project located on very old alluvial fan sediments, the very old Pleistocene alluvial fan deposits (Qvofa) that directly underlie the younger alluvial valley sediments (Qyv) have a high potential to contain significant non-renewable paleontological resources, and are thus assigned a "high paleontological resource sensitivity". Similar older Pleistocene alluvial fan sediments throughout the lowland (valley) areas of western Riverside County and the Inland Empire have been reported to yield significant fossils of extinct terrestrial mammals from the last Ice Age, such as mammoths, mastodons, giant ground sloths, dire wolves, short-faced bears, saber-toothed cats, large and small horses, camels, and bison. However, the earlier collections and records search report for the Stratford Ranch Project did not identify any nearby fossil localities within the boundaries of that property, nor within a one-mile radius, which encompasses the Project area (BFSA, 2020).

The closest recorded fossil localities may be those reported by the SBCM from Pleistocene older alluvium near the Lakeview Hot Springs area on the southeast side of the Perris Reservoir. Fossil vertebrates collected from these localities included mammoth, extinct horse, and extinct bison. Fossil Bison have been reported from a location approximately six miles northeast of the Project area at a depth of 17 feet below ground surface, suggesting that the fossil was from Pleistocene older alluvial or older alluvial fan sediments (BFSA, 2020).

Another collections and records search of the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County (LACM) in Los Angeles of a property approximately one mile northwest of the Project area is reported not to have identified any previously recorded fossil localities on that property, nor within at least a one-mile radius (BFSA, 2020).

A pedestrian survey of the Project area was conducted by BFSA on May 22, 2019. Where possible, narrow transect paths were employed to ensure maximum lot coverage. All exposed ground was inspected for paleontological resources. Except for a few locations in the western portion of the Project area that had been previously cleared (between 2008 and 2011), ground visibility was generally poor and limited by dense vegetation. No fossils were identified, as would be expected because fossils are not usually found on the surface of flat-lying alluvial plains.

A Paleontological sensitivity map generated by the Riverside County Land Information System in June 2019 ranks the entire project area as having a High paleontological sensitivity (“High B”), which is:

[E]quivalent to High A, but is based on the occurrence of fossils at a specified depth below the surface. The category High B indicates that fossils are likely to be encountered at or below four feet of depth, and may be impacted during excavation by construction activities.

The category “High B” indicates that potential fossils are likely to be encountered at or below four feet of depth and may be impacted during excavation by construction activities. Alluvial valley sediments and very old alluvial fan sediments with a High potential/sensitivity (“High B”) to yield nonrenewable paleontological resources (*i.e.*, fossils). Additionally, based on the Paleontological Sensitivity Map (Exhibit CN-7) in the Conservation Element of the City’s *Comprehensive General Plan 2030*, the Project is located within Area 4 for paleontological sensitivity. Area 4 is assigned a “low to high” paleontological sensitivity, based on the presence of the Pleistocene older valley deposits (High sensitivity) underlying young alluvium at the surface (Low sensitivity). Sites located within Area 4 require that paleontological monitoring be initiated once subsurface excavations reach five feet below the surface, with a stipulation that monitoring “levels” be reduced at the discretion of the project paleontologist, if appropriate (BFSA, 2020).

4.7.2 EXISTING POLICIES AND REGULATIONS

Section 4.5, Geology and Soils, of the PVCCSP EIR provides a discussion of the regulatory framework for the analysis of impacts related to geology and soils. Following is a discussion of regulations that are specifically relevant to the Project, which information that is new or has been updated since the PVCCSP EIR was prepared. It should be noted that development of the Project is also required to comply with regulations pertaining to erosion from wind and water, which are addressed in Section 4.3, Air Quality, and Section 4.10, Hydrology and Water Quality, respectively, of this EIR (e.g., Federal Clean Water Act, South Coast Air Quality Management District [SCAQMD] Rule 403, etc.).

State

Alquist-Priolo Earthquake Fault Zoning Act (A-P Act)

The Alquist-Priolo Special Studies Zones Act of 1972 was renamed in 1994 to the Alquist Priolo Earthquake Fault Zoning (A-P) Act. The A-P Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. Local agencies must regulate most development projects within the zones. Projects include all land divisions and most structures for human occupancy. Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet)

There are no active faults within the Project area and the Project area is not located within any A-P Earthquake Fault Zone.

Seismic Hazards Mapping Act

California Geological Survey (CGS) provides guidance with regard to seismic hazards. Under the CGS Seismic Hazards Mapping Act (SHMA) of 1990 (Public Resources Code, Chapter 7.8, Section 2690-2699.6), seismic hazard zones are identified and mapped to assist local governments in land use planning. The intent of the SHMA is to protect the public from the effects of strong ground shaking, liquefaction, landslides, ground failure, or other hazards caused by earthquakes. The SHMA requires the State Geologist to establish regulatory zones (Zones of Required Investigation) and to issue appropriate maps (Seismic Hazard Zone maps). CGS Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California, provides guidance for the evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigations.

The USGS quadrangle that includes the Project area has not yet been mapped pursuant to the SHMA. However, based on information presented in the site-specific Geotechnical Investigation, the Project area is in an area with moderate to high potential for liquefaction. Due to the relatively flat topography of the Project area, there is a low potential for earthquake-induced landslides.

California Building Code

The California Building Code (also known as the “California Building Standards Code” or CBC) is promulgated under the *California Code of Regulations* (CCR) (Title 24, Parts 1 through 12) and is administered by the California Building Standards Commission (CBSC). The national model code standards adopted into Title 24 apply to all occupancies in California except for modifications adopted by State agencies and local governing bodies. The CBSC published the 2019 CBC in July 2019, which is based on the 2018 International Building Code (IBC) (the national model building code), providing standardized requirements for construction and became effective January 1, 2020. The Project would comply with State requirements regarding seismic design in effect at the time building permits are issued. Cities and counties may adopt ordinances making more restrictive requirements than provided by CBC, because of local climatic, geological, or topographical conditions. Such adoptions and a finding of need statement must be filed with the California Building Standards Commission.

Local

City of Perris General Plan

The specific policies outlined in the City’s General Plan that are related to geology and soils and that apply to the Project are listed in Table 4.11-2, *City of Perris General Plan Consistency Analysis*, of EIR Section 4.11, Land Use and Planning, of this EIR. Notably, the Safety Element policies applicable to the analysis of geology and soils include:

Policy I.E All development will be required to include adequate protection from damage due to seismic incidents.

Measure I.E.1 Require geological and geotechnical investigations by State-licensed professionals, in areas with potential for earthquake-induced liquefaction, landsliding, other slope instability, or settlement as part of the environmental and development review process.

Measure I.E.2 Require implementation of mitigation measures identified in such investigations mentioned above [in Measure I.E.1], prior to the issuance of grading and building permits.

Measure I.E.5 Adopt and enforce the most current version of the California Building Code (CBC).

City of Perris Building Code

Chapter 16.08 (Building, Plumbing and other Codes Adopted), of the City of Perris Municipal Code includes the City's Building Code. Building construction is governed by the CBC; however, the City has amended and provided exemptions to the CBC that address specific geologic considerations in the City. As identified in Chapter 16.08.050 (Adoption of the 2019 California Building Code), the 2019 CBC shall become the building codes of the City for regulating the erection, construction, enlargement, alteration, repair, moving, removal, demolition, conversion, occupancy, equipment, use, height, area and maintenance of all buildings and/or structures in the City.

4.7.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines a project will normally have a significant adverse environmental impact on geology and soils if it will:

- a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:
 - Rupture of a known earthquake fault, as delineated on the most Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault.
 - Strong seismic ground shaking.
 - Seismic-related ground failure, including liquefaction.
 - 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 on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.
- d. Be located on expansive soil, as defined in Table 18-I-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.

4.7.4 ENVIRONMENTAL IMPACTS

Applicable PVCCSP Plan Standards and Guidelines and Mitigation Measures

There are no PVCCSP Standard and Guidelines applicable to the analysis of geology and soils. The PVCCSP EIR includes mitigation measure GEO 1 for potential impacts related to geology and soils. As required by PVCCSP EIR mitigation measure MM Geo 1, site-specific geotechnical reports have been prepared for the Project and are included in Appendix F of this EIR.

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.*

Impact Analysis

Threshold a **Would the Project 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 Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault?**

Fault rupture can occur along pre-existing, known active fault traces; however, fault rupture also can splay from known active faults or rupture along unidentified fault traces. The Geology and Soils section of the PVCCSP EIR Initial Study (Section 3) determined that the PVCCSP area is not located in an Alquist-Priolo Earthquake Fault Zone, and no other known faults are in the vicinity. This is consistent with the conclusions of the site-specific geotechnical studies, which identify that research of available maps indicate that the Rider 2 and Rider 4 sites are not located within an Alquist-Priolo Earthquake Fault Zone, and that SCG did not identify any evidence of faulting during the geotechnical investigation. Therefore, the possibility of significant fault rupture is considered to be low (SCG, 2019a; SCG, 2019b). There would be no impact related to the potential to directly or indirectly expose people or structures to substantial adverse effects related to ground rupture.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

There would be no impact.

Threshold a Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
ii. Strong seismic ground shaking?

The Geology and Soils section of the PVCCSP EIR Initial Study (Section 3) concludes that the PVCCSP area, which includes the Project area, would be subject to strong ground shaking, typical of Southern California, and that design and construction in accordance with current building codes and all geotechnical recommendations would reduce impacts from ground shaking to a less than significant level.

Consistent with PVCCSP EIR mitigation measure MM Geo 1 above, site-specific Geotechnical Investigations have been prepared by a registered geotechnical engineer for the Rider 2 and Rider 4 building sites. As previously identified, the nearest earthquake fault is the San Jacinto Valley fault zone, located approximately 8.7 miles northeast of the site (RCIT, 2020). The Project area is located in an area with high regional seismicity, and the maximum credible magnitude earthquake for the San Jacinto Valley fault is 6.9 (City of Perris, 2016). The risk for seismic hazards is not substantially different than the risk to properties throughout the southern California area.

The Geotechnical Investigations includes site-specific seismic design parameters and provides design/construction recommendations for geotechnical design, grading, construction, foundations, floor slabs, exterior flatwork, retaining walls, and pavement. Consistent with General Plan policies cited above, the Project would be designed and constructed in accordance with all final Geotechnical Investigation recommendations (referred to as mitigation measures in General Plan Measure I.E.2 above), which are based on CBC requirements. The Geotechnical Investigations conclude that the Project is considered feasible from a geotechnical standpoint (SCG, 2019a; SCG, 2019b).

Further, the PVCCSP EIR and the City of Perris Building Code, which incorporates the CBC, provide guidelines and parameters that reduce the effects of ground shaking produced by regional seismic events. The Project Applicant is required to implement seismic design considerations in accordance with the CBC, which is reflected in General Plan Measure I.E.5. Notably, the City would apply a mandatory condition of approval on the Project that would require all buildings to be constructed in accordance with the City of Perris Building Code, which incorporates the CBC.

Consistent with General Plan measures cited above and PVCCSP EIR mitigation measure MM Geo 1, the Project would be designed and constructed in accordance with all final Geotechnical Investigation recommendations (referred to as mitigation measures in General Plan Measure I.E.2 above) and the Geotechnical Investigation shall be reviewed and approved by the City Engineer. With adherence to the City's General Plan policies, compliance with the CBC and City of Perris Building Code, mandatory compliance with the recommendations of the final Geotechnical Investigations related to design and construction, and incorporation of PVCCSP EIR mitigation measure MM Geo 1, the Project would not directly or indirectly expose people or structures to substantial adverse effects, including loss, injury or death, involving seismic ground shaking impacts related to strong seismic ground shaking. This impact is less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR Initial Study.

Threshold a Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

iii. Seismic-related ground failure, including liquefaction?

Liquefaction is the loss of strength in generally cohesionless, saturated soils when the pore-water pressure induced in the soil by a seismic event becomes equal to or exceeds the overburden pressure. The primary factors which influence the potential for liquefaction include groundwater table elevation, soil type and plasticity characteristics, relative density of the soil, initial confining pressure, and intensity and duration of ground shaking. The depth within which the occurrence of liquefaction may impact surface improvements is generally identified as the upper 50 feet below the existing ground surface. Liquefaction potential is greater in saturated, loose, poorly graded fine sands with a mean (d_{50}) grain size in the range of 0.075 to 0.2 millimeters (mm). Non-sensitive clayey (cohesive) soils which possess a plasticity index of at least 18 are generally not considered to be susceptible to liquefaction, nor are those soils which are above the historic static groundwater table (SCG, 2019a; SCG, 2019b).

The Geology and Soils section of the PVCCSP EIR Initial Study (Section 3) identifies that the Specific Plan area includes locations with varying liquefaction potential, from low to very high, and that site-specific geotechnical studies shall determine the liquefaction risk for each project. As previously discussed, based on review of the Riverside County GIS website, the site-specific Geotechnical Investigations indicate the Project area is located within a zone of moderate to high liquefaction susceptibility. As required, the site-specific Geotechnical Investigations included additional subsurface exploration, laboratory testing, and engineering analysis in order to determine the site-specific liquefaction potential. As further discussed in the Geotechnical Investigations, the liquefaction analysis was conducted in accordance with the requirements of Special Publication 117A, and currently accepted practice. A summary of the liquefaction analysis results is presented below (SCG, 2019a; SCG, 2019b).

As part of the liquefaction evaluation two borings were extended to depths of approximately 50 feet for each of the building sites (Rider 2 and Rider 4); Boring Nos. B-1 and B-8. Based on review of the historic high groundwater table was conservatively assumed to exist at a depth of approximately 26 feet, which is higher than the depth free water was encountered in the borings (depth of 33 feet for the two borings at the Rider 2 site, and depth of 34 feet for the two borings at the Rider 4 site) (SCG, 2019a; SCG, 2019b).

Potentially liquefiable soils were encountered at one of the 50-foot deep boring locations for the Rider 2 site (Boring No. B-8; at approximately 32 to 37 feet). Liquefiable soils were encountered at both of the boring locations for the Rider 4 site; liquefiable strata at Boring No. B-1 are present between depths of

approximately 28 and 37 feet, and at Boring No. B-8, the liquefiable soils exist between depths of approximately 37 and 47 feet. The remaining soil strata encountered below the historic high groundwater table either possess adequate factors of safety, or are considered non-liquefiable. Settlement analyses were conducted for the potentially liquefiable strata. Based on the results of the settlement analyses, the total liquefaction-induced settlements for the building sites are estimated to range from 0 to 2.62 inches, and differential settlements are expected to be on the order of approximately 1.5 inches or less. The estimated differential settlement can be assumed to occur across a distance of 100 feet, indicating a maximum angular distortion of approximately 0.001 inches per inch. Therefore, the proposed development is considered feasible to support the proposed structures on shallow foundation, as described in the Geotechnical Investigations (SCG, 2019a; SCG, 2019b).

It is expected that similar soils would underlie the proposed Rider Street bridge area. As required pursuant to the City's General Plan Policy I.E, and implementing measures, future design-level studies for the bridge site would include site-specific liquefaction evaluations and site-specific recommendations outlined in the design-level geotechnical investigation would be incorporated into the bridge design. However, it is expected that similar depths of liquefiable soils would be present in the bridge area, and the design of the bridge would take the potential liquefaction-induced settlements into account. It is expected that the use of CIDH (cast-in-drilled-hole) would mitigate the liquefaction potential. These foundations would be extended below the depth of liquefiable soils and would account for "downdrag" forces, which is settlement of soil after additional loads (i.e., friction or adhesion between the pile and downward moving soil) are added to the pile (SCG, 2019c).

As previously discussed, the Project area is generally flat and does not contain, nor is it adjacent to any, steep natural or manufactured slopes and there is no evidence of historical landslides. As such, the Project area is not susceptible to seismically-induced landslides.

Consistent with General Plan measures cited above and PVCCSP EIR mitigation measure MM Geo 1, the Project would be designed and constructed in accordance with all final Geotechnical Investigation recommendations (referred to as mitigation measures in General Plan Measure I.E.2 above) and the Geotechnical Investigation shall be reviewed and approved by the City Engineer. With adherence to the City's General Plan policies, compliance with the CBC and City of Perris Building Code, mandatory compliance with the recommendations of the final Geotechnical Investigations related to design and construction, and incorporation of PVCCSP EIR mitigation measure MM Geo 1, the Project would not directly or indirectly expose people or structures to substantial adverse effects, including loss, injury or death from seismic-related ground failure, including liquefaction. This impact would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

**Threshold a Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
iv. Landslides?**

The Geology and Soils section of PVCCSP EIR Initial Study (Section 3) concludes that there would be no impacts related to landslides, as the PVCCSP area, which includes the Project area, is relatively flat and not located near any areas that possess potential landslide characteristics. There are no hillsides or steep slopes within the Project area or in the immediate vicinity of the area (refer to the site photographs presented in Section 4.1, Aesthetics, of this EIR). Accordingly, implementation of the Project would not expose people or structures within the Project area to substantial landslide risks, and implementation of the Project would not pose a substantial direct or indirect landslide risk to properties surrounding the Project area. No impact would result.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

No impact would result, consistent with the conclusion of the PVCCSP EIR.

Threshold b Would the Project result in substantial soil erosion or the loss of topsoil?

Erosion is the process by which the upper layers of the surface (such as soils) are worn and removed by the movement of water or wind. Soils with characteristics such as low permeability and/or low cohesive strength are more susceptible to erosion than those soils having higher permeability and cohesive strength. Wind erosion can damage land and natural vegetation by removing soil from one place and depositing it in another. It mostly affects dry, sandy soils in flat, bare areas, but wind erosion may occur wherever soil is loose, dry, and finely granulated. According to soil data compiled by the United States Department of Agriculture (USDA), soils within the Project area and surrounding area primarily contain a low susceptibility to water and wind erosion (USDA, 2020). However, under existing conditions, the Project area has the potential to contribute windblown soil and sand because it is undeveloped with no or little vegetative cover and contains loose and dry topsoil conditions.

The PVCCSP EIR Initial Study concludes that no long-term soil erosion would occur, as PVCCSP implementing projects would involve the development of structures, paving (i.e., hardscape), and landscaping; short-term construction-related erosion potential would be addressed through compliance with National Pollutant Discharge Elimination System (NPDES) permit requirements, and impacts would be less than significant.

Construction-Related Erosion

The largest source of erosion and topsoil loss, particularly in a developed environment, is uncontrolled drainage during construction. The Project area is relatively flat, and surface water flows generally to the southeast. Ground disturbance (including over-excavation, utility trenching, and foundation excavation during construction activities on exposed soils) could lead to erosion and topsoil loss during heavy rains and windy conditions. Grading for the Project would be limited to relatively minor cuts and fills to establish

design grades, to prepare building foundations, and for utility trenching/infrastructure excavation, and proposed PVSD Channel improvements.

As further discussed in Section 4.10, Hydrology and Water Quality, of this EIR, pursuant to the requirements of the State Water Resources Control Board, the Project Applicant would be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities, including grading. The NPDES permit is required for all development projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least 1 acre of total land area. The City's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires development projects to prepare and submit to the City for approval a site-specific Storm Water Pollution Prevention Plan (SWPPP) to demonstrate compliance with the NPDES permit requirements. The SWPPP is required to identify a combination of erosion control and sediment control measures (i.e., Best Management Practices) that will reduce or eliminate sediment discharge to surface water from stormwater and non-stormwater discharges during construction. In addition, as discussed in Section 4.3, Air Quality, of this EIR, the Project Applicant would be required to comply with SCAQMD Rule 403's requirements related to fugitive dust control, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion. With mandatory compliance with all applicable regulatory requirements as presented in the Air Quality and Hydrology and Water Quality sections of this EIR, the potential for water and/or wind erosion within the Project area during construction activities would be less than significant.

Post-Development Erosion

Regarding erosion during long-term Project operation, consistent with the PVCCSP EIR Initial Study, the Rider 2 and Rider 4 building sites would be landscaped or covered with impervious surfaces and surface runoff would be captured and treated by an on-site storm drain system. Implementation of the Project would result in less long-term erosion and loss of topsoil than under the existing condition of the building sites. The City's MS4 NPDES Permit requires the Project Applicant to prepare and submit to the City for approval a WQMP. The WQMP identifies an effective combination of erosion control and sediment control measures (i.e., BMPs) to reduce or eliminate sediment discharge to surface water from stormwater and non-stormwater discharges. The Preliminary WQMP for the Project, prepared by Albert A. Webb and Associates (Webb) (included in Appendix J), incorporate ribbon gutters, curb and gutters, grate inlets, and subsurface storm drain systems. The storm drain systems would be used to convey flows into a proposed water quality storage basin before being pumped into a proposed bioretention basin. These design features would be effective at removing silt and sediment from stormwater runoff, and the Preliminary WQMP requires post-construction maintenance and operational measures to ensure ongoing erosion protection. Compliance with the Preliminary WQMP would be required as a condition of Project approval and long-term maintenance of on-site water quality features is required.

The PVSD Channel is designed such that the velocities would be non-erosive. A concrete-lined drop structure would be installed just downstream of the Metropolitan Water District (MWD) easement to ensure that runoff can get to the lower elevation of the Channel without causing erosion. For the side slopes of the channel, as standard practice and consistent with existing conditions, the Riverside County Flood Control & Water Conservation District (RCFC&WCD) regularly inspects the Channel and as needed track walk the side slopes to remove rills that may appear.

Therefore, the Project would not result in substantial erosion or loss of top soil during long-term operation resulting in a less than significant impact.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

Threshold c	Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
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The Geology and Soils section of the PVCCSP EIR Initial Study (Section 3) concludes that the potential for lateral spreading and landslide is low, as the PVCCSP area is relatively flat; however, the potential for subsidence is high. Seismic-related ground failure is addressed under Threshold a(iii) above. Expansive soil is addressed under Threshold d below. The following discussion of the potential settlement and shrinkage/subsidence potential is summarized from the Geotechnical Investigations and review of the Rider Street Bridge, as applicable (SCG, 2019a; SCG, 2019b; SCG, 2019c).

Settlement Potential

Settlement refers to unequal compression of a soil foundation, shrinkage, or undue loads being applied to a building after its initial construction that affect the soil foundation. Remedial grading, as recommended in the Geotechnical Investigations, would remove the compressible/collapsible near-surface native alluvium, and replace these materials as compacted structural fill. The native soils that would remain in place below the recommended depth of overexcavation would not be subject to significant load increases from the foundations of the new structure. With adherence to remedial grading recommendations, the post-construction static settlements of the proposed structures would be within tolerable limits.

Shrinkage/Subsidence Potential

Subsidence is a gradual settling or sudden sinking of the ground surface (i.e., loss of elevation). The principal causes of subsidence are aquifer-system compaction, drainage of organic soils, underground mining, and natural compaction. Shrinkage is the reduction in volume in soil as the water content of the soil drops (i.e., loss of volume). The Geotechnical Investigations concluded that removal and recompaction of the near-surface native fill soils would result in an average shrinkage of 5 to 10 percent for the Rider 2 building, and 5 to 13 percent for the Rider 4 building. Minor ground subsidence is expected to occur in the soils below the zone of removal, due to settlement and machinery working. Subsidence is estimated to be 0.10 feet. The settlement and subsidence would occur during the initial grading for the Project, and would not affect the proposed buildings. This estimate is based on previous experience and the subsurface conditions encountered at the boring locations. The actual amount of subsidence is expected to be variable and will be dependent on the type of machinery used, repetitions of use, and dynamic effects, which are difficult to assess precisely.

Since the Rider Street bridge would be supported on drilled piers, excessive collapse or subsidence are not expected to be significant issues for the bridge construction. As with the buildings, any settlement and subsidence would occur during the initial grading, and would not affect the proposed bridge structure.

Soluble Sulfates

Representative samples of the near-surface soils at the Rider 2 and Rider 4 sites were submitted for laboratory testing to determine the soluble sulfate content. Soluble sulfates are naturally present in soils, and if the concentration is high enough, can result in degradation of concrete which comes into contact with these soils. The results of the soluble sulfate testing indicate the sulfate classification as negligible.

Consistent with General Plan measures cited above and PVCCSP EIR mitigation measure MM Geo 1, the Project would be designed and constructed in accordance with all Geotechnical Investigation recommendations (referred to as mitigation measures in General Plan Measure I.E.2 above); and the Geotechnical Investigations shall be reviewed and approved by the City Engineer. Furthermore, the City of Perris would conduct a thorough administrative review of future grading permits to ensure that earthwork activities do not result in any conditions that could result in unstable soils. Therefore, with compliance with City General Plan measures, the recommendations of the final Geotechnical Investigations, and PVCCSP EIR mitigation measure MM Geo 1, impacts related to location on an unstable geologic unit or soil would be less than significant; and no additional mitigation is required.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

Threshold d	Would the Project be located on expansive soil, as defined in Table 18-I-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?
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Expansive soils are soils that exhibit cyclic shrink and swell patterns in response to variations in moisture content. The expansion potential of the on-site soils was determined in general accordance with ASTM D-4829. Soil testing conducted as part of the Geotechnical Investigations identified the near surface soils on the Rider 2 site possess a low to medium expansion potential (Expansion Index [EI] = 34 and 68), and soils on the Rider 4 site possess a low expansion potential (EI = 28 and 39). Based on the presence of expansive soils, the recommendations of the Geotechnical Investigations indicate that care should be given to proper moisture conditioning of all building pad subgrade soils to a moisture content of 2 to 4 percent above the ASTM D-1557 optimum during site grading. In addition to adequately moisture conditioning the subgrade soils and fill soils during grading, special care must be taken to maintaining moisture content of these soils at 2 to 4 percent above the optimum moisture content. This requires the contractor to frequently moisture condition these soils throughout the grading process, unless grading occurs during a period of relatively wet weather. Further, provisions should be made to limit the potential for surface water to penetrate the soils immediately adjacent to the structure.

Based on soils data from the Rider 2 and Rider 4 building sites, the Rider Street bridge site is expected to be underlain by low to medium expansive soils as well. Since the bridge would be supported on CIDH or CISS deep foundations, the presence of expansive soils is not expected to be a significant issue for

the bridge construction. Per Caltrans standards, all soils used for backfill and/or embankments at the abutments would be EI less than 50 and Sand Equivalent (SE) greater than 20.

Consistent with General Plan measures cited above and PVCCSP EIR mitigation measure MM Geo 1, the Project would be designed and constructed in accordance with all final Geotechnical Investigations recommendations (referred to as mitigation measures in General Plan Measure I.E.2 above); and the Geotechnical Investigations shall be reviewed and approved by the City Engineer. Therefore, with compliance with City General Plan measures, the recommendations of the final Geotechnical Investigations, and PVCCSP EIR mitigation measure MM Geo 1, impacts related to expansive soils would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

Threshold e	Would the Project 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?
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The Rider 2 and Rider 4 buildings would be connected to an existing sewer line in Redlands Avenue for conveyance of wastewater to treatment facilities, and there would be no impact related to on-site soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

No impact would occur, consistent with the conclusion of the PVCCSP EIR.

Threshold f	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
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The PVCCSP EIR concludes that, with implementation of identified mitigation measures, development of allowed uses and infrastructure projects identified in the PVCC Specific Plan would not directly or indirectly destroy unique paleontological resources, paleontological sites, or unique geologic features.

As previously discussed, no paleontological resources have been identified within the vicinity of the Project area; however, the very old Pleistocene alluvial fan deposits that directly underlie the younger alluvial valley sediments have a high potential to contain significant nonrenewable paleontological resources, and are thus assigned a “high paleontological resource sensitivity”.

Deeper ground-disturbing activities associated with construction, estimated at depths of up to 13 feet for installation of the water quality basins have the potential to encounter previously unknown unique paleontological resources. This could result in a significant impact to paleontological resources. Based on (1) the existence of potentially fossiliferous Quaternary very old alluvial fan deposits beneath the Holocene and upper Pleistocene young alluvial valley deposits; (2) the known occurrence of terrestrial vertebrate fossils at shallow depths from Quaternary older alluvial fan sediments across the Inland Empire of western Riverside County; and (3) the high paleontological sensitivity typically assigned to Quaternary older alluvial fan sediments for yielding paleontological resources, paleontological monitoring would be required during mass grading and excavation activities in undisturbed Quaternary older alluvial fan sediments in order to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources, if present.

Compliance with mitigation measure MM 7-1, which, is an updated version of PVCCSP EIR mitigation measure MM Cult 5 is incorporated into the Project, would ensure that potential impacts to paleontological resources, if present, are less than significant. PVCCSP EIR mitigation measure MM 7-1 requires monitoring during grading activities. The role of the monitor and salvage and resource recovery measures that must be implemented if paleontological resources are found are also identified. No additional mitigation is required.

Additional Project-Level Mitigation Measures

Mitigation measure MM 7-1 below implements PVCCSP EIR mitigation measure MM Cult 5, as subsequently revised by the City of Perris.

MM 7-1 Prior to the issuance of grading permits, the Project Applicant 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 monitor representative) to be present on-site during any project-related excavations that exceed three (3) feet below the pre-grade surface. Selection of the paleontologist shall be subject to approval of the City of Perris Planning Manager and no grading activities shall occur at the site or within the off-site Project improvement areas until the paleontologist has been approved by the City.

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

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

A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered specimens. The report and inventory, when submitted to the City

of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontological resources.

Level of Significance After Mitigation

Implementation of mitigation measure MM 7-1 would reduce any potential impacts to paleontological resources to a less than significant level.

4.7.5 CUMULATIVE IMPACTS

As noted in the foregoing analysis, the potential Project-related impacts related to geology and soils would be considered less than significant with adherence to the City's General Plan policies and implementing measures, compliance with the CBC and City of Perris Building Code, implementation of PVCCSP EIR mitigation measure MM Geo-1, and required incorporation of site-specific geotechnical recommendations contained in the Geotechnical Investigations into the Project design.

With exception of erosion hazards, the effects of geology and soils are inherently restricted to the areas proposed for development and would not contribute to cumulative impacts associated with other existing, planned, or proposed development. For example, development of the Project would not alter geologic events or soil features/characteristics (such as ground shaking, seismic intensity, or soil expansion); therefore, the Project would not affect the level of intensity at which a seismic event on an adjacent site is experienced. However, project development and future development in the area may expose more persons to seismic hazards. As with the Project, future development would have potentially significant geology/soils impacts prior to mitigation and would also be required to have site-specific geotechnical investigations prepared to identify the geologic and seismic characteristics on a site and to provide recommendations for engineering design and construction to ensure the structural integrity of proposed development; as required by the City, these recommendations would be incorporated into project design. Compliance of individual projects with the recommendations of the applicable geotechnical investigation, and adherence to the CBC and City of Perris Building Code would prevent hazards associated with geologic issues (e.g., fault rupture, seismic ground shaking, liquefaction, landslides, unstable soils, expansive soils and other geologic issues). Therefore, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to geology and soils.

With respect to erosion, as discussed under Threshold b, regulatory requirements mandate that the Project incorporate measures design during construction and long-term operation to ensure that significant erosion impacts do not occur. Other development projects in the vicinity of the Project would be required to comply with the same regulatory requirements as the Project to preclude substantial adverse water and wind erosion impacts. Because the Project and other cumulative projects would be subject to similar mandatory regulatory requirements to control erosion hazards during construction and long-term operation, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to erosion.

Although development activities within the Project area would not impact any known paleontological resources, there is the potential that such resources are buried beneath the surface of the Project area and could be impacted during construction. Other projects within the region would similarly have the potential to impact unknown, subsurface paleontological resources during ground-disturbing activities. However, implementation of mitigation measure MM 7-1 for the Project, and similar mitigation

requirements for development in the City, would ensure the proper identification and subsequent treatment of any paleontological resources that may be encountered during ground-disturbing activities associated. With implementation of mitigation measure MM 7-1, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact to paleontological resources.

4.7.6 REFERENCES

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4.8 GREENHOUSE GAS EMISSIONS

This section identifies and evaluates the Project's potential to have adverse effects related to greenhouse gas (GHG) emissions during construction and operation. The analysis in this section is based on Project-specific *IDI Rider 2 and 4 High Cube Warehouse and Perris Valley Storm Drain Channel Improvement Project Greenhouse Gas Analysis, City of Perris* (GHG Analysis), prepared by Urban Crossroads (Urban Crossroads, 2020), and included in Appendix H of this EIR.

Comments relating to the issue of GHG emissions were raised in response to the Project's Notice of Preparation (NOP) for this Draft Environmental Impact Report (EIR). Specifically, in its NOP comment letter, the California Air Resources Board (CARB) requested that an analysis of GHG emissions be conducted. Although not directly related to the issue of GHGs, the South Coast Air Quality Management District (SCAQMD) also commented on the Project's NOP and recommended an analysis of potential air quality emissions (including GHGs).

At the November 6, 2019 EIR public scoping meeting, the Planning Commissioners requested that the EIR address the Project's potential impacts related to GHG emissions.

4.8.1 EXISTING SETTING

Section 4.2, Air Quality, of the Perris Valley Commerce Center Specific Plan (PVCCSP) EIR includes a detailed discussion of the environmental setting at time the EIR was prepared. The discussion includes the following related to GHG issues: setting for the PVCCSP area, stationary and mobile emission sources, GHG constituents, and existing GHG emissions. The following discussion focuses on information that is either particularly relevant to the Project or information that is new or updated since the PVCCSP EIR was prepared.

Global Climate Change and Greenhouse Gases

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the earth's atmosphere, including carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated gases. The majority of scientists believe that this increased rate of climate change is the result of GHGs resulting from human activity and industrialization over the past 200 years.

Global temperatures are regulated by naturally occurring atmospheric gases such as water vapor, CO₂, N₂O, CH₄, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). These particular gases are important due to their residence time (duration they stay) in the atmosphere, which ranges from 10 years to more than 100 years. These gases allow solar radiation into the earth's atmosphere, but prevent radioactive heat from escaping, thus warming the earth's atmosphere. GCC can occur naturally as it has in the past with the previous ice ages.

Gases that trap heat in the atmosphere are often referred to as GHGs. GHGs are released into the atmosphere by both natural and anthropogenic activity. Without the natural GHG effect, the earth's average temperature would be approximately 61 degrees Fahrenheit (°F) cooler than it is currently. The

cumulative accumulation of these gases in the earth’s atmosphere is considered to be the cause for the observed increase in the earth’s temperature.

The effects of climate change in California related to public health, water resources, agriculture, forests and landscapes, rising sea levels, and human health are described in Section 2.6 of the GHG Analysis included in Appendix F of this EIR.

Greenhouse Gases

GHGs trap heat in the atmosphere, creating a GHG effect that results in global warming and climate change. Many gases demonstrate these properties and are discussed in Table 4.8-1, *Greenhouse Gases*. For the purposes of this analysis, emissions of CO₂, CH₄, and N₂O were evaluated because these gases are the primary contributors to GCC from development projects. Although there are other substances such as fluorinated gases that also contribute to GCC, these fluorinated gases were not evaluated as their sources are not well-defined and do not contain accepted emissions factors or methodology to accurately calculate these gases.

Table 4.8-1 Greenhouse Gases

Greenhouse Gases	Description	Sources	Health Effects
Water	<p>Water is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered to be a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. A climate feedback is an indirect, or secondary, change, either positive or negative, that occurs within the climate system in response to a forcing mechanism. The feedback loop in which water is involved is critically important to projecting future climate change.</p> <p>As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to ‘hold’ more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect</p>	<p>The main source of water vapor is evaporation from the oceans (approximately 85%). Other sources include evaporation from other water bodies, sublimation (change from solid to gas) from sea ice and snow, and transpiration from plant leaves.</p>	<p>There are no known direct health effects related to water vapor at this time. It should be noted however that when some pollutants react with water vapor, the reaction forms a transport mechanism for some of these pollutants to enter the human body through water vapor.</p>

Greenhouse Gases	Description	Sources	Health Effects
	<p>energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a “positive feedback loop.” The extent to which this positive feedback loop will continue is unknown as there are also dynamics that hold the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the earth’s surface and heat it up).</p>		
CO ₂	<p>CO₂ is an odorless and colorless GHG. Since the industrial revolution began in the mid-1700s, the sort of human activity that increases GHG emissions has increased dramatically in scale and distribution. Data from the past 50 years suggests a corollary increase in levels and concentrations. As an example, prior to the industrial revolution, CO₂ concentrations were fairly stable at 280 parts per million (ppm). Today, they are around 370 ppm, an increase of more than 30%. Left unchecked, the concentration of CO₂ in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources.</p>	<p>CO₂ is emitted from natural and manmade sources. Natural sources include: the decomposition of dead organic matter; respiration of bacteria, plants, animals and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources include: the burning of coal, oil, natural gas, and wood. CO₂ is naturally removed from the air by photosynthesis, dissolution into ocean water, transfer to soils and ice caps, and chemical weathering of carbonate rocks.</p>	<p>Outdoor levels of CO₂ are not high enough to result in negative health effects. According to the National Institute for Occupational Safety and Health (NIOSH) high concentrations of CO₂ can result in health effects such as: headaches, dizziness, restlessness, difficulty breathing, sweating, increased heart rate, increased cardiac output, increased blood pressure, coma, asphyxia, and/or convulsions. It should be noted that current concentrations of CO₂ in the earth’s atmosphere are estimated to be approximately 370 ppm, the actual reference exposure level (level at which</p>

Greenhouse Gases	Description	Sources	Health Effects
			adverse health effects typically occur) is at exposure levels of 5,000 ppm averaged over 10 hours in a 40-hour workweek and short-term reference exposure levels of 30,000 ppm averaged over a 15 minute period.
CH ₄	CH ₄ is an extremely effective absorber of radiation, although its atmospheric concentration is less than CO ₂ and its lifetime in the atmosphere is brief (10-12 years), compared to other GHGs.	CH ₄ has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of CH ₄ . Other anthropogenic sources include fossil-fuel combustion and biomass burning.	CH ₄ is extremely reactive with oxidizers, halogens, and other halogen-containing compounds. Exposure to high levels of CH ₄ can cause asphyxiation, loss of consciousness, headache and dizziness, nausea and vomiting, weakness, loss of coordination, and an increased breathing rate.
N ₂ O	N ₂ O, also known as laughing gas, is a colorless GHG. Concentrations of N ₂ O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration was 314 parts per billion (ppb).	N ₂ O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used as an aerosol spray propellant, i.e., in whipped cream bottles. It is also used in potato chip bags to keep chips fresh. It is used in rocket engines and in race cars. N ₂ O can be transported into the stratosphere, be deposited on	N ₂ O can cause dizziness, euphoria, and sometimes slight hallucinations. In small doses, it is considered harmless. However, in some cases, heavy and extended use can cause Olney's Lesions (brain damage).

Greenhouse Gases	Description	Sources	Health Effects
		the earth's surface, and be converted to other compounds by chemical reaction.	
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in CH ₄ or ethane (C ₂ H ₆) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble and chemically unreactive in the troposphere (the level of air at the earth's surface).	CFCs have no natural source but were first synthesized in 1928. They were used for refrigerants, aerosol propellants and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and was extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.	In confined indoor locations, working with CFC-113 or other CFCs is thought to result in death by cardiac arrhythmia (heart frequency too high or too low) or asphyxiation.
HFCs	HFCs are synthetic, man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential (GWP). The HFCs with the largest measured atmospheric abundances are (in order), fluoroform (CHF ₃), 1,1,1,2-tetrafluoroethane (CH ₂ FCF ₂), and 1,1-difluoroethane (CH ₃ CF ₂). Prior to 1990, the only significant emissions were of CHF ₃ . CH ₂ FCF ₂ emissions are increasing due to its use as a refrigerant.	HFCs are manmade for applications such as automobile air conditioners and refrigerants.	No health effects are known to result from exposure to HFCs.
PFCs	PFCs have stable molecular structures and do not break down through chemical processes in the lower atmosphere. High-energy ultraviolet rays, which occur about 60 kilometers above earth's surface, are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF ₄) and hexafluoroethane (C ₂ F ₆). The EPA estimates that concentrations of CF ₄ in the atmosphere are over 70 parts per trillion (ppt).	The two main sources of PFCs are primary aluminum production and semiconductor manufacture.	No health effects are known to result from exposure to PFCs.

Greenhouse Gases	Description	Sources	Health Effects
SF ₆	SF ₆ is an inorganic, odorless, colorless, nontoxic, nonflammable gas. It also has the highest GWP of any gas evaluated (23,900). The EPA indicates that concentrations in the 1990s were about 4 ppt.	SF ₆ is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.	In high concentrations in confined areas, the gas presents the hazard of suffocation because it displaces the oxygen needed for breathing.
Nitrogen Trifluoride (NF ₃)	NF ₃ is a colorless gas with a distinctly moldy odor. The World Resources Institute (WRI) indicates that NF ₃ has a 100-year GWP of 17,200.	NF ₃ is used in industrial processes and is produced in the manufacturing of semiconductors, Liquid Crystal Display (LCD) panels, types of solar panels, and chemical lasers.	Long-term or repeated exposure may affect the liver and kidneys and may cause fluorosis.

Source: (Urban Crossroads, 2020)

GHGs have varying Global Warming Potential (GWP) values. GWP of a GHG indicates the amount of warming a gas causes over a given period of time and represents the potential of a gas to trap heat in the atmosphere. CO₂ is utilized as the reference gas for GWP, and thus has a GWP of 1. CO₂ equivalent (CO₂e) is a term used for describing the difference GHGs in a common unit. CO₂e signifies the amount of CO₂ which would have the equivalent GWP. The atmospheric lifetime and GWP of selected GHGs are summarized at Table 4.8-2, *GWP and Atmospheric Lifetime of Select GHGs*. As shown in Table 4.8-2, per the Intergovernmental Panel on Climate Change (IPCC)'s Second Assessment Report GWPs range from 1 for CO₂ to 23,900 for SF₆, while GWP for the IPCC's 5th Assessment Report range from 1 for CO₂ to 23,500 for SF₆.

Table 4.8-2 GWP and Atmospheric Lifetime of Select GHGs

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)	
		Second Assessment Report	5th Assessment Report
CO ₂	-*	1	1
CH ₄	12.4	21	28
N ₂ O	121	310	265
HFC-23	222	11,700	12,400
HFC-134a	13.4	1,300	1,300
HFC-152a	1.5	140	138
SF ₆	3,200	23,900	23,500

*As per Appendix 8.A. of IPCC's 5th Assessment Report, no single lifetime can be given.

Source: (Urban Crossroads, 2020)

Global, National, State, and Regional Contributions to Greenhouse Gas Emissions

Worldwide anthropogenic GHG emissions are tracked by the IPCC for industrialized nations (referred to as Annex I) and developing nations (referred to as Non-Annex I). Human GHG emissions data for Annex I nations are available through 2017. Based on the latest available data, the sum of these emissions totaled approximately 29,216,501 gigagram (Gg) CO₂e as summarized on Table 4.8-3, *Top GHG*

Producing Countries and the European Union. As noted in Table 4.8-3, the United States, as a single country, was the number two producer of GHG emissions in 2017.

Table 4.8-3 Top GHG Producing Countries and the European Union

Emitting Countries	GHG Emissions (Gg CO₂e)
China	11,911,710
United States	6,456,718
European Union (28-member countries)	4,323,163
India	3,079,810
Russian Federation	2,155,470
Japan	1,289,630
Total	29,216,501

Source: (Urban Crossroads, 2020)

California has significantly slowed the rate of growth of GHG emissions due to the implementation of energy efficiency programs as well as adoption of strict emission controls but is still a substantial contributor to the U.S. emissions inventory total. CARB compiles GHG inventories for the State of California. Based upon the 2019 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2017 GHG emissions period, California emitted an average 424.1 million metric tons of CO₂e per year (MMT CO₂e/yr).

4.8.2 EXISTING POLICIES AND REGULATIONS

Section 4.2 of the PVCCSP EIR provides a complete discussion of the regulatory framework for the analysis of GHG impacts. The following discussion summarizes the regulatory information for GHGs presented in the PVCCSP EIR that are particularly relevant to the Project or information that is new or updated since the PVCCSP EIR was prepared. Additional information regarding GHG regulations, and related energy regulations is presented in Section 2.7, Regulatory Setting, of the GHG Analysis included in Appendix F of this EIR, and in Section 4.5, Energy.

Federal

Greenhouse Gases Endangerment

In *Massachusetts v. Environmental Protection Agency* 549 U.S. 497 (2007), decided on April 2, 2007, the United States Supreme Court (Court) found that four GHGs, including CO₂, are air pollutants subject to regulation under Section 202(a)(1) of the Clean Air Act (CAA). The Court held that the EPA Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under section 202(a) of the CAA:

- **Endangerment Finding:** The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs— CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆—in the atmosphere threaten the public health and welfare of current and future generations.
- **Cause or Contribute Finding:** The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles, as discussed in the section “Clean Vehicles” below. After a lengthy legal challenge, the U.S. Court declined to review an Appeals Court ruling that upheld the EPA Administrator’s findings.

Light-Duty Vehicle Greenhouse Gas Emission and Corporate Average Fuel Economy Standards

The U.S. Environmental Protection Agency (USEPA) and the Department of Transportation’s National Highway Traffic Safety Administration (NHTSA) have been working together on developing a National Program of regulations to reduce GHG emissions and to improve fuel economy of light-duty vehicles for model years 2017 and beyond. On April 1, 2010, the USEPA and NHTSA announced a joint Final Rulemaking establishing standards for 2012 through 2016 model year vehicles. This was followed up on in August 2012, when the agencies issued a Final Rulemaking with standards for model years 2017 through 2025. The final standards are projected to result in an average industry fleetwide level of 163 grams/mile of CO₂ in model year 2025, which is equivalent to 54.5 mpg if achieved exclusively through fuel economy improvements.

The EPA and the U.S. Department of Transportation issued final rules for the first national standards to reduce GHG emissions and improve fuel efficiency of heavy-duty trucks (HDT) and buses on September 15, 2011, effective November 14, 2011. For combination tractors, the agencies are proposing engine and vehicle standards that begin in the 2014 model year and achieve up to a 20% reduction in CO₂ emissions and fuel consumption by the 2018 model year. For HDT and vans, the agencies are proposing separate gasoline and diesel truck standards, which phase in starting in the 2014 model year and achieve up to a 10% reduction for gasoline vehicles and a 15% reduction for diesel vehicles by the 2018 model year (12 and 17% respectively if accounting for air conditioning leakage). Lastly, for vocational vehicles, the engine and vehicle standards would achieve up to a 10% reduction in fuel consumption and CO₂ emissions from the 2014 to 2018 model years.

On April 2, 2018, the EPA signed the Mid-term Evaluation Final Determination, which finds that the model year 2022-2025 GHG standards are not appropriate and should be revised. This Final Determination serves to initiate a notice to further consider appropriate standards for model year 2022-2025 light-duty vehicles. On August 24, 2018, the EPA and NHTSA published a proposal to freeze the model year 2020 standards through model year 2026 and to revoke California’s waiver under the CAA to establish more stringent standards.

State

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and State air pollution control programs in California. On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05, which calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80% below 1990 levels by 2050. This Executive Order, the California Global Warming Solutions Act (commonly referred to as AB 32), Senate Bill 32 (SB 32), and other State policies, regulations, and laws addressing GHG emissions are discussed in Section 4.2, Air Quality, of the PVCCSP EIR, and in Section 2.7, Regulatory Setting, of the GHG Analysis included in Appendix F of this EIR. The following standards are particularly relevant to the Project.

Title 24 California Code of Regulations

CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020. The CEC indicates that the 2019 Title 24 standards update indoor and outdoor lighting for nonresidential buildings. The CEC anticipates that nonresidential buildings will use approximately 30% less energy due to lighting upgrades.

CCR, Title 24, Part 11: CALGreen is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2011, and is administered by the California Building Standards Commission (CBSC). CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that have become effective on January 1, 2020. Local jurisdictions are permitted to adopt more stringent requirements, as state law provides methods for local enhancements. CALGreen recognizes that many jurisdictions have developed existing construction and demolition ordinances and defers to them as the ruling guidance provided, they establish a minimum 65% diversion requirement. The code also provides exemptions for areas not served by construction and demolition recycling infrastructure. The State Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy, which is generally enforced by the local building official. 2019 CALGreen standards are applicable to the Project as further described in the GHG Analysis include:

- **Short-term bicycle parking.** If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- **Long-term bicycle parking.** For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- **Designated parking.** In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- **Construction waste management.** Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- **Excavated soil and land clearing debris.** 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phase project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- **Recycling by Occupants.** Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for

recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).

- **Water conserving plumbing fixtures and fittings.** Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
 - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
 - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
 - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute at 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- **Outdoor portable water use in landscaped areas.** Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient (MWELO), whichever is more stringent (5.304.1).
- **Water meters.** Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 sf or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (5.303.1.1 and 5.303.1.2).
- **Outdoor water use in rehabilitated landscape projects equal or greater than 2,500 sf.** Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 sf requiring a building or landscape permit (5.304.3).
- **Commissioning.** For new buildings 10,000 sf and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

Executive Order S-3-05

Executive Order (EO) S-3-05 documents GHG emission reduction goals, creates the Climate Action Team and directs the Secretary of the California EPA to coordinate efforts with meeting the GHG reduction targets with the heads of other state agencies. The EO requires the Secretary to report back to

the Governor and Legislature biannually to report: progress toward meeting the GHG goals; GHG impacts to California; and applicable Mitigation and Adaptation Plans. EO S-3-05 goals for GHG emissions reductions include: reducing GHG emissions to 2000 levels by the year 2010; reducing GHG emissions to 1990 levels by the year 2020; and reducing GHG emissions to 80% below 1990 levels by 2050.

Senate Bill 375

The Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act, SB 375, Chapter 728, Statutes of 2008) supports the State's climate action goals to reduce greenhouse gas (GHG) emissions through coordinated transportation and land use planning with the goal of more sustainable communities. Under the Sustainable Communities Act, CARB sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established these targets for 2020 and 2035 for each region covered by one of the State's metropolitan planning organizations (MPO). CARB will periodically review and update the targets, as needed.

Each of California's MPOs must prepare a "sustainable communities strategy" (SCS) as an integral part of its regional transportation plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate "alternative planning strategy" (APS) to meet the targets. The APS is not a part of the RTP.

The Sustainable Communities Act also establishes incentives to encourage local governments and developers to implement the SCS or the APS. Developers can get relief from certain environmental review requirements under CEQA if their new residential and mixed-use projects are consistent with a region's SCS (or APS) that meets the targets.

Senate Bill 32

On September 8, 2016, Governor Jerry Brown signed the SB 32 and its companion bill, AB 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80% below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature.

CARB Scoping Plan Update

In November 2017, CARB released the *Final 2017 Scoping Plan Update*, which identifies the State's post-2020 reduction strategy. The *Final 2017 Scoping Plan Update* reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the LCFS, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce CH₄ emissions from agricultural and other wastes. The *Final 2017 Scoping Plan Update* establishes a new emissions limit of 260 MMTCO_{2e} for the year 2030, which corresponds to a 40% decrease in 1990 levels by 2030.

California's climate strategy will require contributions from all sectors of the economy, including the land base, and will include enhanced focus on zero- and near-zero-emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (CH₄, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries will further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the *Final 2017 Scoping Plan Update* framework are addressed under the analysis presented under Threshold b in Section 4.8.4, Environmental Impacts, of this EIR.

Regional

South Coast Air Quality Management District

Beginning in April 2008, the SCAQMD convened a Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. On December 5, 2008, the SCAQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold of 10,000 MTCO₂e/yr for industrial projects where the SCAQMD is the lead agency. The policy objective for establishing this significance threshold is to capture projects that represent approximately 90 percent of GHG emissions from new sources and to avoid EIR-level analysis for relatively small impacts.

In September 2010, the Working Group proposed extending the 10,000 MTCO₂e/yr screening threshold currently applicable to industrial projects where the SCAQMD is the lead agency, described above, to other lead agency industrial projects. A project with emissions less than the applicable screening value would be considered to have less than significant GHG emissions. Projects with emissions greater than the screening values would be further analyzed.

Local

City of Perris General Plan Policies

The Conservation Element-Sustainable Community Section of the City of Perris General Plan defines goals and policies related to GHG. The specific goals policies of the General Plan related to GHG that are relevant to the Project and a discussion of the Project's consistency is provided in Table 4.11-2 in Section 4.11, Land Use and Planning, of this EIR.

City of Perris Climate Action Plan (CAP)

The City of Perris Climate Action Plan (CAP) was adopted by the City Council (Resolution Number 4966) on February 23, 2016. The CAP was developed to address GCC through the reduction of harmful GHG emissions at the community level, and as part of California's mandated statewide GHG emissions reduction goals under AB 32. Perris's CAP, including the GHG inventories and forecasts contained within, is based on the Western Riverside Council of Governments (WRCOG's) Subregional CAP. The Perris CAP utilized WRCOG's analysis of existing GHG reduction programs and policies that have already been implemented in the subregion and applicable best practices from other regions to assist in meeting the

2020 subregional reduction target. The CAP reduction measures chosen for the City's CAP were based on their GHG reduction potential, cost-benefit characteristics, funding availability, and feasibility of implementation in the City of Perris. The CAP used an inventory base year of 2010 and included emissions from the following sectors: residential energy, commercial/industrial energy, transportation, waste, and wastewater. The CAP's 2020 reduction target is 15% below 2010 levels, and the 2035 reduction target is 47.5% below 2010 levels. The City of Perris is expected to meet these reduction targets through implementation of statewide and local measures. Beyond 2020, Executive Order S-03-05 calls for a reduction of GHG emissions to a level 80% below 1990 levels by 2050. The CAP suggests that since state and federal strategies for post-2020 are speculative at this point, it is recommended that the City commence planning for the post-2020 period in 2017, at the appropriate midway point between plan implementation and the reduction target.

4.8.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on air quality if it will:

- 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.

Because the City of Perris and other agencies with jurisdiction related to GHG emissions have not established or adopted quantitative significance standards and because the City of Perris has used the SCAQMD 10,000 MTCO₂e/yr standard for projects recommended by the SCAQMD, this standard was determined appropriate to use in determining whether the Project's emissions would be cumulatively considerable and therefore result in a significant impact.

4.8.4 ENVIRONMENTAL IMPACTS

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

There are no Standards or Guidelines specifically related to GHG emissions included in the PVCCSP. The PVCCSP EIR includes the following mitigation measures (MMs) to address air pollutant emissions, which would also reduce GHG emissions.

Mitigation Measures

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 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 Nitrogen Oxides (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.*

Impact Analysis

Threshold a Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
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Please refer to Section 4.3, Air Quality, of this EIR, and the Project's Air Quality Impact Analysis (AQIA) included in Appendix B, for a discussion of the models used to estimate the Project's GHG emissions, and a description of construction and operational modeling assumptions. Modeling and Project-related input assumptions used to evaluate the Project's GHG impacts are based on the same modeling methodology conducted to assess the Project's air quality impacts.

The proposed PVSD Channel improvements, including replacement of the Rider Street bridge, would involve construction activity, and such construction activities are included in the analysis. For on-going operations, vehicular trips would be generated by motor vehicles traveling to and from the PVSD Channel during periodic maintenance, consistent with existing conditions. As such, the PVSD Channel would not generate quantifiable GHG emissions from Project operations. Additionally, the PVSD Channel does not propose any buildings and therefore no permanent source or stationary source emissions. Therefore, there are no significant GHG emissions in regard to operation of the PVSD Channel.

Construction Activities

Project construction activities would generate CO₂ and CH₄ emissions. As previously indicated, for construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To

amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions. The amortized construction emissions are presented in Table 4.8-4, *Amortized Annual Construction Emissions*. As shown, construction of the Project would result in annual GHG emissions of 126.59 MTCO_{2e} when construction of the Project with the one stage bridge construction is amortized over 30 years in accordance with the SCAQMD-recommended methodology, and annual amortized emissions of 138.02 MTCO_{2e} with the two stage bridge construction. Because construction emissions are amortized over a 30-year project lifetime and are included in the evaluation of operational emissions, there is no significance finding for construction emissions.

Table 4.8-4 Amortized Annual Construction Emissions

Activity	Emissions (MT/yr)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ E ^a
Project with One Stage Bridge Construction				
Channel Excavation	140.18	0.04	0.00	141.29
Channel Construction (2020)	40.26	0.01	0.00	40.57
Channel Construction (2021)	1,325.11	0.17	0.00	1,329.30
Rider 2 & 4 (2020)	61.46	0.02	0.00	61.95
Rider 2 & 4 (2021)	2,218.88	0.22	0.00	2,224.50
Total	3,785.90	0.47	0.00	3,797.60
Amortized Construction Emissions (MTCO_{2e})	126.20	0.02	0.00	126.59
Project with Two Stage Bridge Construction				
Channel Excavation	140.18	0.04	0.00	141.29
Channel Construction (2020)	30.62	0.01	0.00	30.86
Channel Construction (2021)	1,318.32	0.16	0.00	1,322.25
Channel Construction (2022)	358.64	0.05	0.00	359.83
Rider 2 & 4 (2020)	61.46	0.02	0.00	61.95
Rider 2 & 4 (2021)	2,218.88	0.22	0.00	2,224.50
Total	4,128.09	0.50	0.00	4,140.67
Amortized Construction Emissions (MTCO_{2e})	137.60	0.02	0.00	138.02

a. CalEEMod reports the most common GHGs emitted which include CO₂, CH₄, and N₂O. These GHGs are then converted into the CO_{2e} in CalEEMod based on their corresponding GWP.

Annual construction outputs are provided in Appendices 3.1 and 3.2 (CalEEMod) of the Project’s GHG Analysis (Appendix H of this EIR).

Source: (Urban Crossroads, 2020)

Operational Activities

Project GHG emissions during long-term operation would result from area source emissions (landscape maintenance equipment); energy source emissions (natural gas and electricity consumption); mobile source emissions (off-site traffic); on-site equipment emissions; water supply, treatment, and distribution; and solid waste. Mobile-source input for Project trip generation was taken from the Project's Traffic Impact Analysis (TIA), included in Appendix L of this EIR. A detailed description of the operational emissions sources is presented in Section 3.6 of the GHG Analysis included in Appendix H of this EIR.

Project operation would be required to comply with mitigation measures from the PVCCSP EIR identified in Section 4.3, Air Quality, of this EIR. Specifically, Mitigation Measure MM Air 20, which sets performance standards on energy and water usage, would apply. Project operation is also assumed to comply with the following mitigation measures to aid in the reduction of GHG emissions: Mitigation measure MM Air 11 (which limits truck idling time), Mitigation Measure MM Air 13 (which promotes the use of "clean" truck fleets), Mitigation Measure MM Air 14 (which requires parking to accommodate ride-sharing vehicles), and Mitigation Measure MM Air 19 (which requires energy-efficient lighting). However, due to uncertainties associated with these mitigation measures and the limitations of the emissions model, these emissions reductions are not quantified. As such, the emissions calculations presented below represent a conservative estimate. The annual GHG emissions associated with the operation of the Project, inclusive of the Project's amortized construction emissions, are estimated to be 13,440.86 MTCO_{2e} per year and 13,452.29 MTCO_{2e} per year, when taking into consideration the one stage and two stage bridge construction scenarios, respectively, as summarized in Table 4.8-5, *Project GHG Emissions*.

The City of Perris does not have an adopted threshold of significance for GHG emissions. For CEQA purposes, the City has discretion to select an appropriate significance criterion, based on substantial evidence. The SCAQMD's adopted numerical threshold of 10,000 MTCO_{2e} per year for industrial stationary source emissions is selected as the significance criterion. The SCAQMD-adopted industrial threshold was selected by the City because the Project is more analogous to an industrial use than any other land use such as commercial or residential in terms of its expected operating characteristics. The Project involves proposed warehouse uses that would serve mid-stream functions in the goods movement chain between manufacturers and consumers, characteristic of an industrial operation. Further, analysis of the Project's traffic generation in this report is based on the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, 2017 for warehouse and industrial land use categories. Also, 10,000 MTCO_{2e} has been used as the significance threshold by many local government lead agencies for logistics projects throughout the Southern California Association of Governments (SCAG) region since the SCAQMD adopted this threshold for its own use. Further, to ensure that the threshold is conservative in its application, although the SCAQMD uses their adopted 10,000 MTCO_{2e} threshold to determine the significance of stationary source emissions for industrial projects, the 10,000 MTCO_{2e} threshold used in this CEQA document is applied to all sources of Project-related GHG emissions whether stationary source, mobile source, area source, or other.

Use of this threshold is also consistent with guidance provided in the California Air Pollution Control Officers Association (CAPCOA) CEQA and Climate Change handbook, as such, the City has opted to use a non-zero threshold approach based on Approach 2 of the handbook. Threshold 2.5 (Unit-Based Thresholds Based on Market Capture) establishes a numerical threshold based on capture of approximately 90% of emissions from future development. The latest threshold developed by SCAQMD using this method is 10,000 MTCO_{2e} based on the review of 711 CEQA projects.

Table 4.8-5 Project GHG Emissions

Emission Source	Emissions (MT/yr)			
	CO ₂	CH ₄	N ₂ O	Total CO ₂ E ^a
Project with One Stage Bridge Construction				
Annual construction-related emissions amortized over 30 years	126.20	0.02	0.00	126.59
Area Source	0.08	2.10E-04	0.00	0.08
Energy Source	957.00	0.04	9.18E-03	960.66
Mobile Source	11,355.41	0.19	0.00	11,360.24
On-Site Equipment	254.20	0.08	0.00	256.26
Waste	262.07	15.49	0.00	649.27
Water Usage	70.94	0.52	0.01	87.76
Total CO₂E (All Sources)	13,440.86			
Project with Two Stage Bridge Construction				
Annual construction-related emissions amortized over 30 years	137.60	0.02	0.00	138.02
Area Source	0.08	2.10E-04	0.00	0.08
Energy Source	957.00	0.04	9.18E-03	960.66
Mobile Source	11,355.41	0.19	0.00	11,360.24
On-Site Equipment	254.20	0.08	0.00	256.26
Waste	262.07	15.49	0.00	649.27
Water Usage	70.94	0.52	0.01	87.76
Total CO₂E (All Sources)	13,452.29			

a. CalEEMod reports the most common GHGs emitted which include CO₂, CH₄, and N₂O. These GHGs are then converted into the CO₂e in CalEEMod based on their corresponding GWP. Further, CO₂e is a term used for describing the difference GHGs in a common unit. CO₂e signifies the amount of CO₂ which would have the equivalent GWP.

Annual construction outputs are provided in Appendices 3.1 and 3.2 (CalEEMod) of the Project’s GHG Analysis (Appendix H); Annual operational outputs are provided in Appendix 3.4 (CalEEMod) of the Project’s GHG Analysis.

Source: (Urban Crossroads, 2020)

As noted in Table 4.8-5, Project emissions of GHGs would exceed the SCAQMD threshold of 10,000 MTCO₂e. Prior to mitigation, the Project’s emissions of GHGs would represent a cumulatively-considerable impact for which mitigation would be required. In addition to the mitigation measures from the PVCCSP EIR identified above, mitigation measures identified in Section 4.3, Air Quality, of this EIR would also serve to reduce GHG emissions (mitigation measures MM 3-1 through MM 3-14. However, quantifiable reductions due to implementation of these measures cannot be specified as there is no way to quantify these reductions in CalEEMod. As such, Project GHG emissions, which exceed applicable SCAQMD numeric thresholds, would be cumulative considerable and significant and unavoidable.

Additional Mitigation Measures

Refer to mitigation measures MM 3-1 through MM 3-14 in Section 4.3, Air Quality, of this EIR, which would also serve to reduce the Project’s emissions of GHGs.

Level of Significance after Mitigation

The Project’s cumulative GHG emissions impacts would be significant and unavoidable.

Threshold b Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

As previously stated, pursuant to Section 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. As such, the Project’s consistency with SB 32 (CARB 2017 Scoping Plan) and the City of Perris CAP is discussed below. It should be noted that the Project’s consistency with the 2017 Scoping Plan also satisfies consistency with AB 32 since the 2017 Scoping Plan is based on the overall targets established by AB 32. Consistency with the 2008 Scoping Plan is not necessary, since the target year for the 2008 Scoping Plan was 2020, and the Project’s buildout year is 2021. As such the 2008 Scoping Plan does not apply and consistency with the 2017 Scoping Plan is relevant. Project consistency with the 2017 Scoping Plan and the City’s CAP are evaluated in the following discussions.

It should be noted that the Project would be required to comply with applicable provisions of Title 24 Energy Efficiency Standards and California Green Building Standards. As previously identified, the State Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy, and adherence to these requirements is confirmed by the City during the respective Project approvals.

2017 CARB Scoping Plan Consistency

The 2017 Scoping Plan Update reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Table 4.8-6, *2017 Scoping Plan Consistency Summary*, summarizes the Project’s consistency with the 2017 Scoping Plan. As summarized, the Project would not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories. As shown in Table 4.8-6, the Project would not conflict with any of the 2017 Scoping Plan elements as any regulations adopted would apply directly or indirectly to the Project. Further, recent studies show that the State’s existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40% below 1990 levels by 2030. As such, Project impacts due to a conflict with the 2017 CARB Scoping Plan would be less than significant.

Table 4.8-6 2017 Scoping Plan Consistency Summary

Action	Responsible Parties	Consistency
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	Consistent. The Project would use energy from Southern California Edison (SCE). SCE has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. The Project would not interfere with or obstruct SCE energy source diversification efforts.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		Consistent. The Project would be designed and constructed to implement the energy efficiency measures for new industrial developments and would include several measures designed to reduce energy consumption. The Project would not interfere with or obstruct

Action	Responsible Parties	Consistency
<p>Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly- owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.</p>		<p>policies or strategies to establish annual targets for statewide energy efficiency savings and demand reduction.</p> <p>Consistent. The Project would be designed and constructed to implement the energy efficiency measures, where applicable by including several measures designed to reduce energy consumption. The Project includes energy efficient field lighting and fixtures that meet the current Title 24 Standards throughout the Project area and would be a modern development with energy efficient boilers, heaters, and air conditioning systems.</p>
<p>Implement Mobile Source Strategy (Cleaner Technology and Fuels)</p>		
<p>At least 1.5 million zero emission and plug-in hybrid light-duty EVs by 2025.</p>	<p>CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies</p>	<p>Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2025 targets. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and will therefore comply with the strategy.</p>
<p>At least 4.2 million zero emission and plug-in hybrid light-duty EVs by 2030.</p>		<p>Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2030 targets. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and will therefore comply with the strategy.</p>
<p>Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.</p>		<p>Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.</p>
<p>Medium- and Heavy-Duty GHG Phase 2.</p>		<p>Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to implement Medium- and Heavy-Duty GHG Phase 2. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and will therefore comply with the strategy.</p>
<p>Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the</p>		<p>Not applicable. This measure is not within the purview of this Project.</p>

Action	Responsible Parties	Consistency
penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO _x standard.		
Last Mile Delivery: New regulation that would result in the use of low NO _x or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		Not applicable. This Project is not responsible for implementation of SB 375 and would therefore not conflict with this measure
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document “Potential VMT Reduction Strategies for Discussion.”		Consistent. This Project would not obstruct or interfere with implementation of SB 375 and would therefore not conflict with this measure.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	Not applicable. The Project is not within the purview of SB 375 and would therefore not conflict with this measure.
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor’s Office of Business and Economic Development (GO-Biz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	Consistent. The Project would not obstruct or interfere with agency efforts to harmonize transportation facility project performance with emissions reductions and increase competitiveness of transit and active transportation modes.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC,	Consistent. The Project would not obstruct or interfere with agency efforts to develop pricing policies to support low-GHG transportation.

Action	Responsible Parties	Consistency
	CARB	
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	Consistent. This measure would apply to all trucks accessing the Project area, this may include existing trucks or new trucks that are part of the statewide goods movement sector. The Project would not obstruct or interfere with agency efforts to Improve freight system efficiency.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.		Not applicable. This measure is not within the purview of this Project.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	Consistent. When adopted, this measure would apply to all fuel purchased and used by the Project in the state. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, California State Water Resource Control Board (SWRCB), Local Air Districts	Consistent. The Project would be required to comply with this measure and reduce any Project-source SLPS emissions accordingly. The Project would not obstruct or interfere agency efforts to reduce SLPS emissions.
50% reduction in black carbon emissions below 2013 levels.		
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	Not applicable. This measure is not within the purview of this Project.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	Consistent. The Project would be required to comply with any applicable Cap-and-Trade Program provisions. The Project would not obstruct or interfere agency efforts to implement the post-2020 Cap-and-Trade Program.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	Consistent. The Project would not obstruct or interfere agency efforts to protect land from conversion through conservation easements and other incentives. Notably, the Project would expand the PVSD Channel, which is

Action	Responsible Parties	Consistency
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity		Public/Quasi-Public (PQP) Conserved Lands, by approximately 20 acres. Consistent. The Project area is vacant disturbed property and does not comprise an area that would effectively provide for carbon sequestration. The Project would not obstruct or interfere agency efforts to increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments		Consistent. To the extent appropriate for the proposed industrial buildings, wood products would be used in construction, including for the roof structure. Additionally, the proposed project includes landscaping, including the planting of trees.
Establish scenario projections to serve as the foundation for the Implementation Plan		Not applicable. This measure is not within the purview of this Project.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	Not applicable. This measure is not within the purview of this Project.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	Not applicable. This measure is not within the purview of this Project.

Source: (Urban Crossroads, 2020)

City of Perris Climate Action Plan Consistency

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

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

The Project would comply with the CAP through compliance with the PVCCSP EIR mitigation measures and additional Project-level air quality mitigation measures identified in Section 4.3, Air Quality, of this EIR, 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.

Further, the Project is subject to California Building Code requirements. New buildings must achieve the 2019 Building and Energy Efficiency Standards and the 2019 California Green Building Standards requirements, which include energy conservation measures and solid waste reduction measures. While the Project does not include reduced parking, increased density, or a mixed-use development, it would provide sidewalks, bike racks, pedestrian walkways, and Transportation Demand Management (TDM) measures to encourage the use of alternative modes of transportation (walking, biking, and transit). The Project would not conflict with applicable GHG reduction measures in the CAP and the impact would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

4.8.5 CUMULATIVE IMPACTS

As discussed above, the assessment of GHG emissions is inherently cumulative because climate change is a global phenomenon. Because the Project's GHG emissions would exceed the SCAQMD's recommended 10,000 MTCO₂e/yr screening threshold, the Project would result in cumulative impacts related to GHG emissions. Project impacts due to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant on a cumulatively-considerable basis.

4.8.6 REFERENCES

Urban Crossroads, 2020. *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project – Greenhouse Gas Analysis*. July 22, 2020. Included in Appendix H of this EIR.

4.9 HAZARDS AND HAZARDOUS MATERIALS

This section identifies and evaluates the Project's potential impacts related to hazards and hazardous materials. The analysis in this section is based in part, on information from the following 2 documents. References used to prepare this section are listed in Section 4.9.6, References, and supporting graphics are provided at the end of this section.

- *Phase I Environmental Site Assessment IDI Rider II and IV High Cube Warehouse & Perris Valley Storm Drain Channel Improvement Project Rider Street and Redlands Avenue, Perris, California 92571*, prepared by Hazard Management Consulting, Inc. (HMC) (Phase I ESA) (September 13, 2019) (Appendix I of this Environmental Impact Report [EIR])
- *Results of Pesticide Sampling Northeast Corner of Rider Street and Redlands Avenue, Perris, California*, prepared by HMC (Pesticide Sampling Results) (January 22, 2020) (Appendix I of this EIR)

For purposes of this EIR, the term "toxic substance" is defined as a substance that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may present an unreasonable risk of injury to human health or the environment. Toxic substances include chemical, biological, flammable, explosive, and radioactive substances. The term "hazardous material" is defined as a substance that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may: 1) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, disposed of, or otherwise mismanaged; or 2) cause or contribute to an increase in mortality or an increase in irreversible or incapacitating illness. Hazardous waste is defined in the California Code of Regulations, Title 22, Section 66261.3. The defining characteristics of hazardous waste are: ignitability (oxidizers, compressed gases, and extremely flammable liquids and solids); corrosivity (strong acids and bases); reactivity (explosives or generates toxic fumes when exposed to air or water); and toxicity (materials listed by the United States Environmental Protection Agency [EPA] as capable of inducing systemic damage to humans or animals). Certain wastes are called "Listed Wastes" and are found in the California Code of Regulations, Title 22, Sections 66261.30 through 66261.35. Wastes appear on the lists because of their known hazardous nature or because the processes that generate them are known to produce hazardous wastes (which are often complex mixtures).

There were two Notice of Preparation (NOP) comment letters received regarding the analysis of hazards and hazardous materials: (1) the California Department of Toxic Substances Control (DTSC) recommended that the EIR address potential impacts resulting from historical agricultural use of the Project area and associated releases of agricultural-related chemicals in the soil; and, (2) the Riverside County Airport Land Use Commission (ALUC) confirmed the Project area is within Zones C1 and D of the March Air Reserve Base/Inland Port (MARB/IP) Airport Influence Area (AIA) and ALUC review for the Project is not required because the City's General Plan has been found consistent with the MARB/IP Airport Land Use Compatibility Plan (ALUCP) (City staff can perform the airport compatibility review). NOP comment letters were also received from the California Department of Forestry and Fire Protection (CalFire) and the March Joint Powers Authority (JPA). Neither of these agencies commented on the issues to be addressed in the EIR; CalFire requested that they be added to the distribution of the EIR for the Project, and March JPA indicated that the Project is not located within its jurisdiction. No comments regarding hazards or hazardous materials were raised at the EIR scoping meeting.

4.9.1 EXISTING SETTING

Section 4.6, Hazards and Hazardous Materials, of the Perris Valley Commerce Center Specific Plan (PVCCSP) Final EIR, identifies that the PVCCSP area and surrounding areas are in transition from agricultural land uses to a mix of commerce, industrial and business park uses. Further, the PVCCSP area, including the Project area, is south of and within the AIA of the MARB/IP Airport, and subject to regulations associated with development near the MARB/IP Airport. The Project area (includes the Rider 2 and Rider 4 building sites and the Perris Valley Storm Drain [PVSD] Channel improvement area), and site-adjacent off-site improvements (collectively referred to herein as the Project area) are currently undeveloped, with the PVSD Channel extending along the eastern boundary of the Project area. The building sites have historically been used primarily for agricultural activities. Existing and previous uses of the Project area, and other characteristics of the Project area relevant to the analysis of potential hazards and hazardous materials impacts are described below. A discussion of relevant MARB/IP Airport regulations and hazards is provided in Section 4.9.2, Existing Policies and Regulations.

Historical Review, Regulatory Records Review, and Field Reconnaissance

HMC conducted a Phase I ESA for the Project area in accordance with the ASTM E1527-13 guidelines to evaluate the potential for Recognized Environmental Conditions (RECs)¹. In preparing the Phase I ESA, HMC reviewed previous ESAs prepared for property within the Project area in 2007, 2018 and 2019. These reports were prepared for various transactions involving portions of the Project area and adjacent properties. The current Phase I ESA is an update of these previous reports and includes the entire Project area. The scope of work for the Phase I ESA included the following: a site walk; review of a regulatory database report; interviews with the current owner; review of historical references including aerial photographs, city directories, Sanborn Maps and topographic maps; on-line research and file review requests concerning the Project area and suspect off site sources at the State of California Regional Water Quality Control Board (RWQCB) and Department of Toxic Substances Control (DTSC) websites; and, review of files maintained by the County of Riverside (HMC, 2019). Refer to the Phase I ESA included in Appendix I of this EIR for a more detailed description of HMC's research results.

Regulatory agency database information was obtained from a standard radius site assessment report by Environmental Data Resources, Inc (EDR Report). The center of the search was in the approximate center of the Project area. Search distances for specific databases were one-quarter to one mile as specified in the ASTM 1527-13 standard. The database search includes over 70 federal, state, local, and proprietary records. A complete copy of EDR report is included in Appendix B of the Phase I ESA. Given the direction of groundwater flow to the east southeast, only those facilities identified in the EDR Report adjacent or west and northwest of the Project area were further considered in the Phase I ESA. There are no adjoining facilities listed in the EDR Report and there are no upgradient facilities that may have a potential impact to the Project area (HMC, 2019).

¹ REC means the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

The research conducted by HMC concluded that the Project area was historically undeveloped and/or agricultural in use from at least 1901 until the present. There were no structures noted within the Project area, with the exception of a construction trailer in the southern portion of the Project area (existing), and no issues of concern were noted for the existing condition. The Project area remains undeveloped, with the PVSD Channel along the eastern Project boundary. It is likely that agricultural-related chemicals including herbicides and pesticides were historically used. However, HMC's review of historic aerial photographs did not indicate any areas of storage or mixing of pesticides and herbicides within the Project area, which was mostly consisted of the "fields" for the farming activity. The Project area is currently undeveloped, vacant fallow land. There was no evidence of chemical use, storage, spills, or trash build up noted during the site visit conducted by HMC, and no evidence of RECs from the current use of the Project area. Further, the Project area is located in an area that has had historical agricultural activities. Surrounding areas include residential uses beyond vacant land to the east, vacant land to the north, vacant land and residential uses to the south (beyond Rider Street), and industrial uses to the west (beyond Redlands Avenue). The Phase I ESA found no evidence of off-site facilities that have impacted the Project area. These results are consistent with previous ESAs conducted for the Project area with regards to historical, then current and neighboring uses including the fact that the Project area was historically undeveloped or agricultural in nature. No RECs were identified and no further action was recommended in the previous reports (HMC, 2019).

Wildland Fire Hazards

The Project area is located in a portion of the City of Perris that is not located adjacent to any wildlands. According to the Perris General Plan Safety Element, the Project area and its surrounding area are not located within a wildfire hazard area (City of Perris, 2016). Additionally, according to the California Department of Forestry and Fire Protection's (Cal Fire) Fire and Resources Assessment Program (FRAP), the Project area is not located in a Very High Fire Hazard Severity Zone (VHFHSZ) of the City (CAL FIRE, 2009).

4.9.2 EXISTING POLICIES AND REGULATIONS

The PVCCSP EIR (Section 4.6, Hazards and Hazardous Materials) cites the following regulations applicable to the analysis of hazards and hazardous materials: (1) State and federal agencies and associated databases that regulate hazardous materials, and (2) State and Federal Aviation Administration (FAA) airspace protection and land use compatibility regulations. In addition, applicable goals, policies, and measures from the Safety Element of the *City of Perris General Plan* related to hazards and hazardous materials are provided in the PVCCSP EIR. The discussion of related regulations from the PVCCSP EIR is incorporated by reference. Following is a discussion of current regulations that are particularly applicable to construction and/or operation of the Project.

Federal

Hazardous Materials Regulations and Plans

Resource Conservation and Recovery Act (RCRA)

The Resource Conservation and Recovery Act (RCRA) gives EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and

disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization and phasing out land disposal of hazardous waste as well as corrective action for releases. Some of the other mandates of this law include increased enforcement authority for EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program (EPA, 2019a).

Hazardous Materials Transportation Act (HMTA)

The Hazardous Materials Transportation Act of 1975 (HMTA) empowered the Secretary of Transportation to designate as hazardous material any "particular quantity or form" of a material that "may pose an unreasonable risk to health and safety or property" (OSHA, 2020a).

Hazardous materials regulations are subdivided by function into four basic areas:

- Procedures and/or Policies 49 CFR Parts 101, 106, and 107
- Material Designations 49 CFR Part 172
- Packaging Requirements 49 CFR Parts 173, 178, 179, and 180
- Operational Rules 49 CFR Parts 171, 173, 174, 175, 176, and 177 (OSHA, 2020a)

The HMTA is enforced by use of compliance orders [49 U.S.C. 1808(a)], civil penalties [49 U.S.C. 1809(b)], and injunctive relief (49 U.S.C. 1810). The HMTA (Section 112, 40 U.S.C. 1811) preempts state and local governmental requirements that are inconsistent with the statute, unless that requirement affords an equal or greater level of protection to the public than the HMTA requirement (OSHA, 2020a).

Hazardous Materials Transportation Uniform Safety Act of 1990

In 1990, Congress enacted the Hazardous Materials Transportation Uniform Safety Act (HMTUSA) to clarify the maze of conflicting state, local, and federal regulations. Like the HMTA, the HMTUSA requires the Secretary of Transportation to promulgate regulations for the safe transport of hazardous material in intrastate, interstate, and foreign commerce. The Secretary also retains authority to designate materials as hazardous when they pose unreasonable risks to health, safety, or property. The statute includes provisions to encourage uniformity among different state and local highway routing regulations, to develop criteria for the issuance of federal permits to motor carriers of hazardous materials, and to regulate the transport of radioactive materials (OSHA, 2020a).

Occupational Safety and Health Act (OSHA)

Congress passed the Occupational and Safety Health Act (OSHA) to ensure worker and workplace safety. Their goal was to make sure employers provide their workers a place of employment free from recognized hazards to safety and health, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions. In order to establish standards for workplace health and safety, the Act also created the National Institute for Occupational Safety and

Health (NIOSH) as the research institution for OSHA. OSHA is a division of the U.S. Department of Labor that oversees the administration of the Act and enforces standards in all 50 states (EPA, 2019b).

Airport Regulations

Federal Aviation Regulations Part 77 Surfaces for Compatibility Planning

As discussed in the PVCCSP EIR, Part 77 of the Federal Aviation Regulations (FAR), Objects Affecting Navigable Airspace, establishes standards for determining obstructions to navigable airspace and the effects of such obstructions on the safe and efficient use of that airspace. The regulations require that the FAA be notified of proposed construction or alteration of objects (whether permanent, temporary, or of natural growth) if those objects would be of a height which exceeds FAR Part 77 criteria. The Part 77 regulations define a variety of imaginary surfaces at certain altitudes around airports. The Part 77 surfaces include the primary surface, approach surface, transitional surface, horizontal surface, and conical surface. Penetrations of the Part 77 surface generally are reviewed on a case-by-case basis.

The FAA has additional guidelines regarding protection of airport airspace, which are set forth in other FAA documents. In general, these criteria specify that no use of land or water anywhere within the boundaries encompassed by FAR Part 77 should be allowed if it could endanger or interfere with the landing, take off, or maneuvering of an aircraft at an airport. Specific characteristics to be avoided include creation of electrical interference with navigational signals or radio communication between the airport and aircraft, lighting which is difficult to distinguish from airport lighting, glare in the eyes of pilots using the airport, smoke, or other impairments to visibility in the airport vicinity, and uses which attract birds and create bird strike hazards.

State

Hazardous Materials Regulations and Plans

Cal/OSHA and the California State Plan

Under an agreement with OSHA, since 1973 California has operated an occupational safety and health program in accordance with Section 18 of the federal OSHA. The State of California's Department of Industrial Relations administers the California Occupational Safety and Health Program, commonly referred to as Cal/OSHA. The State of California's Division of Occupational Safety and Health (DOSH) is the principal agency that oversees plan enforcement and consultation. In addition, the California State program has an independent Standards Board responsible for promulgating State safety and health standards, and reviewing variances. It also has an Appeals Board to adjudicate contested citations and the Division of Labor Standards Enforcement to investigate complaints of discriminatory retaliation in the workplace (OSHA, 2020b).

The California State Plan applies to all public and private sector places of employment in the state, with the exception of federal employees, the United States Postal Service, private sector employers on Native American lands, maritime activities on the navigable waterways of the United States, private contractors working on land designated as exclusively under federal jurisdiction and employers that require federal security clearances. Cal/OSHA is the only agency in the state authorized to adopt, amend, or repeal occupational safety and health standards or orders. Compliance officers inspect workplaces for

hazardous conditions and issue citations and orders where violations are identified. Inspections may be the result of regular scheduling, imminent danger reports, fatalities, and worker complaints or referrals (OSHA, 2020b).

California Hazardous Waste Control Law

The Hazardous Waste Control Law (HWCL) (Health and Safety Code [HSC], Division 20, Chapter 6.5, Article 2, Section 25100, et seq.) is the primary hazardous waste statute in California. The HWCL implements RCRA as a “cradle-to-grave” waste management system in the state. It specifies that generators have the primary duty to determine whether their wastes are hazardous and to ensure its proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reuse as raw materials. The HWCL exceeds federal requirements by mandating source reduction planning and broadening requirements for permitting facilities that treat hazardous waste. It also regulates a number of waste types and waste management activities not covered by federal law (CLI, 2020).

California Code of Regulations (CCR), Titles 22 and 26

A variety of California Code of Regulation (CCR) titles address regulations and requirements for generators of hazardous waste. Title 22 contains detailed compliance requirements for hazardous waste generators, transporters, and facilities for treatment, storage, and disposal. Because California is a fully-authorized state according to RCRA, most regulations (i.e., 40 CFR 260, et seq.) have been duplicated and integrated into Title 22. However, because the DTSC regulates hazardous waste more stringently than the EPA, the integration of state and federal hazardous waste regulations that make up Title 22 does not contain as many exemptions or exclusions as does 40 CFR 260. As with the HSC, Title 22 also regulates a wider range of waste types and waste management activities than does RCRA. To aid the regulated community, California has compiled hazardous materials, waste, and toxics-related regulations from CCR, Titles 3, 8, 13, 17, 19, 22, 23, 24 and 27 into one consolidated listing: CCR Title 26 (Toxics). However, the hazardous waste regulations are still commonly referred to collectively as “Title 22” (DTSC, n.d.; DTSC, 2019).

Aeronautics Act

The Aeronautics Act (Public Utilities Code, Section 21001 et seq.) provides for the right of flight over private property, unless conducted in a dangerous manner or at altitudes below those prescribed by federal authority. The Aeronautics Act gives the State Department of Transportation (Caltrans) and local governments the authority to protect the airspace defined by FAR Part 77 criteria. The Aeronautics Act prohibits any person from constructing a structure or permitting any natural growth of a height that would constitute a hazard to air navigation unless a permit is obtained. No permit is required if it is determined that the structure or growth is not a hazard to aviation. Typically, this has been interpreted to mean that no penetration of FAR Part 77 imaginary surfaces is permitted without a finding by the FAA that the object would not constitute a hazard to air navigation.

The State Aeronautics Act also created the requirement for an Airport Land Use Commission (ALUC) in each county and established statewide requirements for the conduct of airport land use compatibility planning. State statutes require that, once an ALUC has adopted or amended an airport land use compatibility plan, the county (where it has land use jurisdiction within the airport influence area)

and any affected cities must update their General Plans and any applicable specific plans to be consistent with the ALUC's plan (Government Code, Section 65302.3). The California Airport Land Use Planning Handbook is published by the Caltrans Division of Aeronautics to support and amplify the State regulations. The most recent California Airport Land Use Planning Handbook was published in October 2011 and, as required by CEQA Public Resources Code Section 21096, was used as a technical resource in the preparation of this EIR.

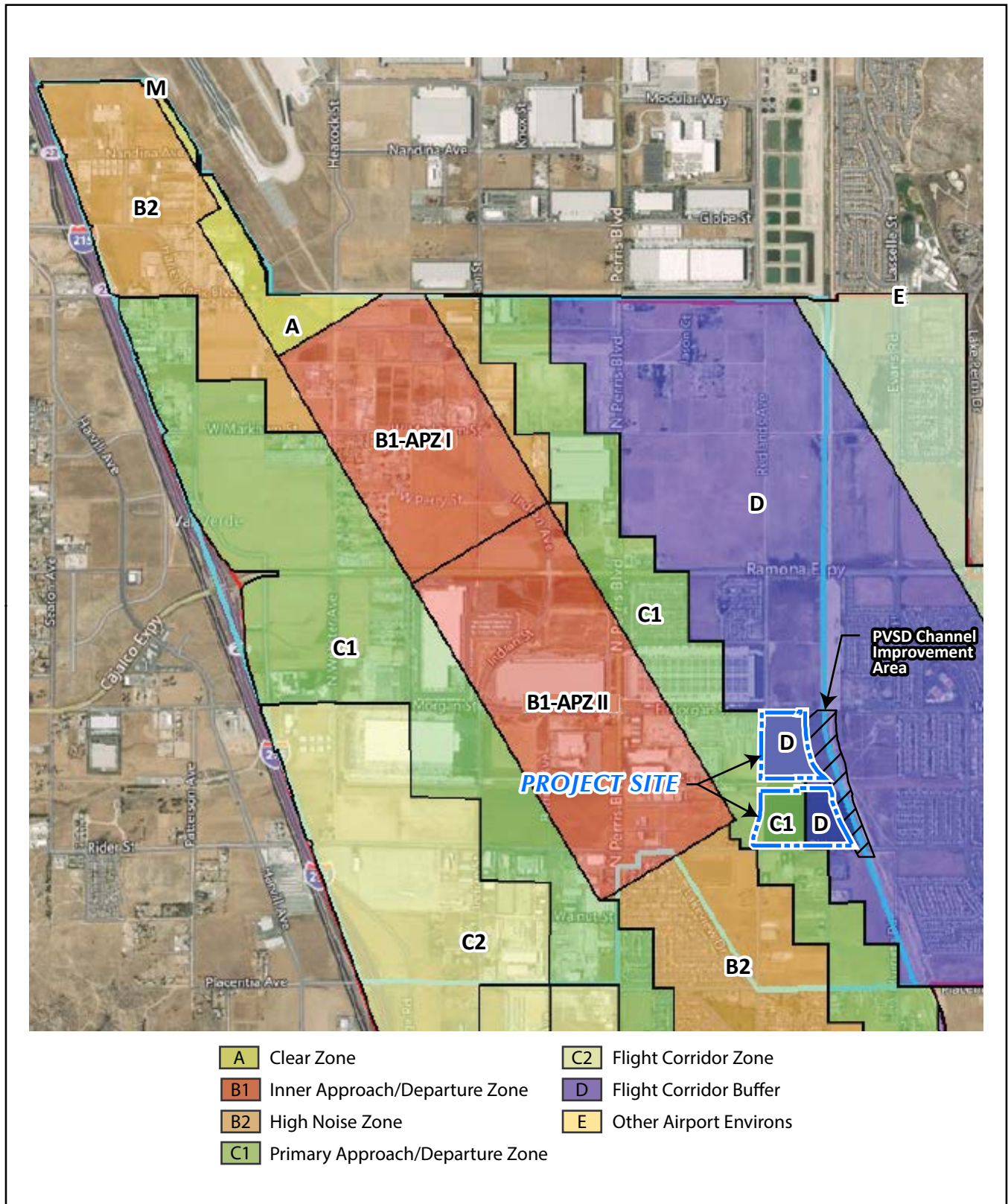
Regional

March Air Reserve Base/Inland Port Airport

The Riverside County ALUC is the lead agency responsible for airport land use compatibility planning in Riverside County. The fundamental purpose of ALUC is to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses. The basic function of the airport land use compatibility plan is to promote compatibility between airports and the land uses that surround them. Compatibility plans serve as a tool for use by airport land use commissions in fulfilling their duty to review proposed development plans for airports and surrounding land uses. Additionally, compatibility plans set compatibility criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances and to landowners in their design of new development.

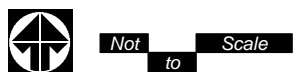
The nearest airport to the Project area is the MARB/IP Airport located approximately 2.6 miles northwest of the Project area. On November 13, 2014, the Riverside County ALUC adopted the MARB/IP ALUCP. The compatibility zones and associated criteria set forth in the MARB/IP ALUCP provide noise and safety compatibility protection (RCALUC, 2014). In 2018, the MARB published an update to its Air Installation Compatible Land Use Zone (AICUZ) study that has not yet been incorporated into the 2014 ALUCP (MARB, 2018). The 2018 AICUZ report provides updated information about the Base operations and related safety and noise impacts.

The Project area is located within the AIA of the MARB/IP Airport, and is subject to the 2014 MARB/IP ALUCP. The Rider 2 site is within the FAR Part 77 Military Outer Horizontal Surface Limits, and Compatibility Zone C1 (Primary Approach/Departure Zone) and Zone D (Flight Corridor Buffer) of the MARB/IP ALUCP. The Rider 4 site is within the FAR Part 77 Military Outer Horizontal Surface Limits, and Compatibility Zone D of the 2014 MARB/IP ALUCP. Figure 4.9-1 depicts the MARB/IP ALUCP Zones. Compatibility Zone C1 encompasses most of the projected 60 dB CNEL contour plus immediately adjoining areas. The zone boundary follows geographic features. Accident potential risks are moderate in that aircraft fly at low altitudes over or near the zone. Zone C1 restricts non-residential intensity to 100 people per average acre and 250 people per single acre. Zone D is intended to encompass other places where aircraft may fly at or below 3,000 feet above the airport elevation either on arrival or departure. Accident potential risk levels in this zone are low. Zone D does not limit non-residential intensity (RCALUC, 2014).



Source(s): Perris Valley Commerce Center Specific Plan (July 2018)

Figure 4.9-1



MARB/IP Airport Land Use Compatibility Plan Zones

Riverside County Department of Environmental Health

Federal and state hazardous materials regulations require all businesses that handle more than a specified amount of hazardous materials or extremely hazardous materials to obtain applicable permits and submit a business plan to its local Certified Unified Program Agency (CUPA). The CUPA also ensures local compliance with all applicable hazardous materials regulations. The CUPA with responsibility for the City of Perris is Riverside County Department of Environmental Health (RCDEH). The RCDEH oversees six hazardous materials programs in the County of Riverside, including inspecting facilities that handle hazardous materials, generate hazardous waste, treat hazardous waste, own/operate underground storage tanks, own/operate aboveground petroleum storage tanks, or handle other materials subject to the California Accidental Release Program (RCDEH, 2020).

County of Riverside Multi-Jurisdictional Local Hazard Mitigation Plan

The purpose of the County of Riverside Multi-Jurisdictional Local Hazard Mitigation Plan is to identify the County's hazards, review and assess past disaster occurrences, estimate the probability of future occurrences and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and man-made hazards. The Plan was prepared pursuant to the requirements of the Disaster Mitigation Act of 2000 to achieve eligibility and potentially secure mitigation funding through Federal Emergency Management Agency (FEMA) Flood Mitigation Assistance, Pre-Disaster Mitigation, and Hazard Mitigation Grant Programs (County of Riverside EMD, 2018).

Local

MARB/IP Airport Overlay Zone

In 2014, and subsequent to approval of the City's 2005 General Plan, the Riverside County ALUC adopted the 2014 MARB/IP ALUCP. Thus, the City was required to update its General Plan to reflect the new ALUCP. The City created an Airport Overlay Zone (AOZ) to accommodate development within the City consistent with the land use designations of the 2014 MARB/IP ALUCP. On July 14, 2016 the Riverside County ALUC determined that the City's AOZ is consistent with the 2014 MARB/IP ALUCP.

In August 2016, the City of Perris approved the following: Resolution 5050 approving General Plan Amendment 15-01522, to amend the City of Perris General Plan (2030) Land Use, Noise, and Safety Elements to implement the 2014 MARB/IP ALUCP; Ordinance Number 1331 approving Ordinance Amendment 16-05024 to update Perris Municipal Code Chapter 19.82 (Districts and Map) to revise the City of Perris Zoning Map to include an Airport Overlay Zoning designation and adopt an AOZ Code Chapter 19 (19.51) to implement the 2014 MARB/IP ALUCP; and, Ordinance Number 1332 approving Specific Plan Amendment 16-05025 to amend the PVCCSP to update the Airport Overlay Zone Section (Section 12) to implement the 2014 MARB/IP ALUCP.

Upon approval by the City, and as identified by the ALUC in its NOP comment letter for this EIR, ALUC review is no longer required for projects within the ALUCP that are consistent with the ALUCP. ALUC maintains review over for projects within Accidental Potential Zone (APZ) I or APZ II of the ALUCP.

City of Perris General Plan Policies

The specific policies outlined in the City's General Plan Safety Element that are related to hazards and hazardous materials and that apply to the Project are listed in Table 4.11-2, *City of Perris General Plan Consistency Analysis*, of Section 4.11, Land Use and Planning, of this EIR.

4.9.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally a significant environmental impact related to hazards and hazardous materials if it will:

- 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 1-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 for 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.

4.9.4 ENVIRONMENTAL IMPACTS

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to hazards and hazardous materials. These Standards and Guidelines (summarized below) are incorporated as part of the Project and are assumed in the analysis presented in this section. The chapters/section numbers provided correspond to the PVCCSP chapters/sections.

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

4.2 On-Site Standards and Guidelines

4.2.1 General On-Site Project Development Standards and Guidelines

- Uses Affecting March Air Reserve Base
- Avigation Easements

Airport Overlay Zone (Chapter 12.0 of PVCCSP)

12.1.3 Compatibility with March ARB/IP ALUCP.

The PVCCSP is in March ARB/IP safety zones and therefore all development 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
- Form 7460-1 (Notice of Proposed Construction or Alteration)

The PVCCSP EIR includes mitigation measures (MMs) for potential impacts related to hazards and hazardous materials, which are listed below. Applicable mitigation measures which are required to be implemented in connection with Project development, construction and operation are identified below and are assumed in the analysis presented in this section.

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

MM Haz 7 *Prior to any excavation or soil removal action on a known contaminated site, or if contaminated soil or groundwater (i.e., with a visible sheen or detectable odor) is encountered, complete characterization of the soil and/or groundwater shall be conducted. Appropriate sampling shall be conducted prior to disposal of the excavated soil. If the soil is contaminated, it shall be properly disposed of, according to Land Disposal restrictions. If site remediation involves the removal of contamination, then contaminated material will*

need to be transported off site to a licensed hazardous waste disposal facility. If any implementing development projects require imported soils, proper sampling shall be conducted to make sure that the imported soil is free of contamination.

Impact Analysis

Threshold a Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

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 federal, State, and City regulations, standards, and guidelines pertaining to hazardous materials management, proposed commercial and industrial developments would not create a significant hazard to the public or the environment through routine use, storage, or disposal of hazardous materials; the impact was determined to be less than significant.

Impact Analysis for Temporary Construction Activities

Heavy equipment (e.g., dozers, excavators) would operate in the Project area during construction of the Rider 2 and Rider 4 buildings and associated improvements, and the PVSD Channel 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. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the EPA, California Department of Toxic Substances Control (DTSC), SCAQMD (discussed in Section 4.3, Air Quality, of this EIR), and RWQCB (discussed in Section 4.10, Hydrology and Water Quality, of this EIR). With mandatory compliance to applicable hazardous materials regulations, the Project 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. Impacts would be less than significant.

Impact Analysis for Long-Term Operational Activities

Operation of the Rider 2 and Rider 4 high cube warehouses 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). There is the potential for routine use, storage, or transport of other hazardous materials; however, the precise materials are not known, as the tenants of the proposed warehouses are not yet defined. In the event that hazardous materials, other than those common materials described above, are associated with future warehouse operations, the hazardous materials would only be stored and transported to and from the building sites. Manufacturing and other chemical processing would not occur within the proposed warehouse uses.

Exposure of people or the environment to hazardous materials during operation of the Project may result from (1) the improper handling or use of 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 previously discussed, 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.

Further, maintenance of the PVSD Channel would also require the use of certain hazards materials (e.g., for weed abatement), consistent with existing maintenance procedures. In addition to compliance with applicable regulations associated with the storage, transport and use of hazardous materials, the Riverside County Flood Control & Water Conservation District (RCFC&WCD), which would continue to be responsible for operation and maintenance of the PVSD Channel, would comply with applicable storm water quality regulations, including its MS4 permit (Municipal Separate Storm Sewer System permits), as discussed in Section 4.10, Hydrology and Water Quality, of this EIR.

Consistent with the conclusion of the PVCCSP EIR, with compliance with applicable regulations, operation of 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 is required.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

<p>Threshold b Would the project 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?</p>
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Hazards from Existing and Previous Uses

The Phase I ESA prepared for the Project concludes that the Project area was historically undeveloped and/or agricultural in use from at least 1901 until the present. There are no structures or issues of concern

noted within the Project area. The PVSD Channel is identified as an unimproved drainage course. No chemical use, storage, spills, or trash build up was identified within the Project area during site visits. The Project area is located in an area that has had historical agricultural activities, and the Phase I ESA did not find evidence of off-site facilities that have impacted the Project area. The Phase I ESA concludes there are no RECs, Controlled Recognized Environmental Conditions (CRECs), or Historical Recognized Environmental Conditions (HRECs) or other significant issues of concern (HMC, 2019).

It is likely that agricultural-related chemicals including herbicides and pesticides were historically used in the Project area; however, review of historic aerial photographs did not indicate any areas of storage or mixing of pesticides and herbicides within the Project area. The Project area was mostly the “fields” for the farming activity. While not a REC, agricultural-related chemicals may be present in the shallow subsurface of the Project which would be considered an Environmental Issue of Note (HMC, 2019). Although not a REC, based on a DTSC’s recommendation, the City requested further chemical analyses to address the potential pesticides that might be present in soil to be reworked during grading activities associated with the Project. The requested investigation was conducted by HMC; the Pesticide Sampling Results are included in Appendix I of this EIR, and summarized below (HMC, 2020).

Since the 1930s, organochlorine pesticides (OCP), such as dichlorodiphenyltrichloroethane (DDT), dieldrin, and heptachlor were commonly used. Some of these insecticides, such as DDT, are persistent organic pollutants which pose a danger when they are released into the environment. In 1970, the United States banned OCPs, and in response, farmers began using other pesticides, such as organophosphorus pesticides (OPPs), which have relatively short half-lives, and therefore were not analyzed during the soil investigation. Arsenic was also analyzed in select samples during the site investigation as a potential chemical of concern due to its used in arsenical pesticides and herbicides prior to the 1950’s. Additionally, historically drainage channels such as the PVSD Channel, which would be improved as part of the Project, have been found to have the potential to be impacted with pesticides from stormwater and irrigation water runoff. Therefore, to ensure that no pesticide impacted soil is present, and because soils excavated from the PVSD Channel would be placed on the building sites, HMC included sampling of soil along the PVSD Channel in the investigation. Groundwater in the vicinity of the Project area has been reported at depths of 26 feet or more below ground surface (bgs) and the potential presence of shallow pesticides in soil is not expected to pose a threat to groundwater (HMC, 2020).

The subsurface investigation was completed on December 10, 2019, and included the collection of soil samples at depths of approximately 0.5- and 1-foot using hand auger equipment. Since potential pesticide use would have been aerially applied, residual contaminants would reside in the upper shallow soils of the Project area. A detailed discussion of the methods for conducting the soils sampling is provided in the Pesticide Sampling Results included in Appendix I of this EIR. Laboratory results were compared to both the state DTSC Screening Levels for industrial/commercial land use (DTSC-SLi) and the federal EPA Regional Screening Levels for industrial/commercial land use (RSLi). These regulatory guidelines are based on a human health risk criterion for dermal exposure, inhalation, and ingestion. The laboratory results indicated no detectable to low concentrations of OCPs, well below both the DTSC-SLi and EPA-RSLi guidelines (HMC, 2020). Accordingly, trace concentrations of pesticides on the Project area do not represent a hazard to the environment or to people who live near the Project area or may work in the area. Impacts would be less than significant. Laboratory results of arsenic slightly exceeded the state DTSC-SLi guidelines, but not the federal EPAR-SLi criteria. Arsenic is a naturally occurring metal. Due to the granitic nature of California geology, concentrations of arsenic sometimes exceed the human health guidelines prepared by the EPA and/or DTSC. The DTSC completed a study of naturally

occurring concentrations of arsenic for school properties for the Los Angeles Unified School District (LAUSD). Based on its study, the DTSC concluded that arsenic would be considered elevated at concentrations exceeding 12 milligrams per kilogram (mg/kg). Based on this information, the concentrations of arsenic detected in the Project area would be considered low. The residual concentrations of OCPs and concentrations of arsenic would not pose a significant human health risk to future workers or occupants of the Project, or pose a threat to groundwater; no further investigations or remediation is required (HMC, 2020).

Hazards from Construction and Operation

As identified in Section 4.6 of the PVCCSP EIR, the handling and transport of hazardous materials can result in accidental releases. However, with required compliance with federal, State, and City regulations, standards, and guidelines pertaining to hazardous materials management, proposed commercial and industrial developments would not create a significant hazard to the public or the environment from accident conditions related to the routine transport, use, or storage of hazardous materials. The impact was determined to be less than significant.

Accidents involving hazardous materials that could pose a significant hazard to the public or the environment would be highly unlikely during the construction and long-term operation of the Project and are not reasonably foreseeable. As discussed above under Threshold “a”, the transport, use, and handling of hazardous materials in the Project area during construction is a standard risk on all construction sites, and there would be no greater risk for upset and accidents than would occur on any other similar construction site. Upon buildout, the Project would operate as warehouse facilities. Based on the operational characteristics of warehouse distribution and light industrial centers, it is possible that hazardous materials could be used during the course of a future occupant’s routine, daily operations; however, as discussed above under Threshold “a”, the Project would be required to comply with all applicable local, State, and federal regulations related to the transport, handling, and usage of hazardous material. In the unlikely event that unknown contaminated soils are encountered during earth-moving activities, PVCCSP EIR mitigation measure MM Haz 7 as described above, would be implemented and would fully address the presence of contaminated soil through appropriate sampling and testing, disposal, and/or remediation.

The Project would not 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 during construction operation. This includes exposure to hazardous materials from previous and current use of the Project area and surrounding areas, and accidental release of hazardous materials during construction and operation of the Project. This impact would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

Threshold c Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

There are no existing or proposed schools within one-quarter mile of the Project area. The closest school is May Ranch Elementary school, located approximately 0.4 miles east of the Rider 2 and Rider 4 building sites at the closest points. Additionally, no schools are located along truck routes that would be used for the Project. No impact related to emissions of hazardous materials within one-quarter mile of a school would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

No impact would occur.

Threshold d Would the project 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?

Based on the EDR Report included in the Phase I ESA (Appendix I of this EIR), the Project area is not included on any regulatory agency database reports (HMC, 2019). Further, based on review of the California Environmental Protection Agency (CalEPA) Cortese List Data Resources, the Project area is not located on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (CalEPA, 2020). Accordingly, no impact would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

No impact would occur.

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

As previously identified, the nearest airport to the Project area is the MARB/IP Airport located approximately 2.6 miles to the northwest. The Project area is within the AIA and the City's AOZ. Safety of people and property on the ground near the MARB/IP Airport is of primary importance in achieving compatible land use. By limiting the number of people in a project area based on its proximity to the

airport and the associated runway, the risk to these people is reduced. The safety zones and occupancy limits for the MARB/IP Airport are established in the 2014 MARB/IP ALUCP.

The Rider 4 building site is completely within Compatibility Zone D (Flight Corridor Buffer). There are no land use restrictions in this zone, no restrictions on the intensity of people at the site, and no open land requirement. As shown in Figure 4.9-1, the western portion of the Rider 2 site is within Compatibility Zone C1 (Primary Approach/Departure Zone) and the eastern portion of the Rider 2 site is within Compatibility Zone D. As presented in Table MA-2, Basic Compatibility Criteria, of the 2014 MARB/IP ALUCP, Compatibility Zone C1 allows a non-residential, average land use intensity of 100 people per acre, and a single-acre land use intensity of 250 people per any single acre. Additionally, there is no “open land” requirement within Compatibility Zone C1. Because the Rider 2 site includes areas within Compatibility Zone C1 and Compatibility Zone D, to allow for a conservative analysis, this analysis applies the occupancy limits for Compatibility Zone C1 to the entire Rider 2 building. Table 4.9-1 provides the average land use intensity calculations used for the Rider 2 building.

Table 4.9-1 Rider 2 Building Average Land Use Intensity Calculation

Land Use	Occupancy Rate (person/sf) ¹	Building Size (sf)	Occupancy (total people)
Office	1 person/100	10,000	100
Warehouse	1 person/500	794,759	1,590
Total		804,759	1,690
1 California Building Code, Section 1004 Occupant Load, Table 1004.1.2 (also cited in Riverside County Airport Land Use Compatibility Plan, Appendix C. Determining Concentrations of People (Adopted, October 14, 2004))			

The proposed Rider 2 building is conservatively estimated to have total occupancy of 1,690 people based on the CBC method for determining concentration of people², which results in an average intensity of approximately 44 people per acre (based on a net site acreage of approximately 38.3 acres). This average occupancy is significantly below the 100 people per acre average intensity allowed in Compatibility Zone C1.

The single-acre intensity calculation assumes the office use in the western portion of the proposed Rider 2 building combined with the remainder of the single acre in warehouse use. Table 4.9-2 provides the single-acre intensity calculation used for the Project. The single-acre occupancy of 127 people per acre is significantly less than the 250 people per single-acre intensity allowed in Compatibility Zone C1.

Table 4.9-2 Rider 2 Building Single-Acre Land Use Intensity Calculation

Land Use	Occupancy Rate (person/sf) ¹	Building Size (sf)	Occupancy (total people)
Office	1 person/100	5,000	50
Warehouse	1 person/500	38,560	77
Total		43,560	127
1 California Building Code, Section 1004 Occupant Load, Table 1004.1.2 (also cited in Riverside County Airport Land Use Compatibility Plan, Appendix C. Determining Concentrations of People (Adopted, October 14, 2004))			

² To allow for a conservative analysis of airport hazard and to be consistent with ALUC’s method for calculation building occupancy, the occupancy estimate used for this airport compatibility assessment exceeds the anticipated occupancy based on the employment generation factors presented in the PVCCSP EIR (781 employees), which is the basis for the discussion of Population and Housing included in Section 6 of this EIR.

As identified on Table MA-2 of the 2014 MARB/IP ALUCP, the ALUCP prohibits certain types of uses within Compatibility Zone C1: children's school, day care centers, libraries, hospitals, congregate care facilities, place of assembly, noise-sensitive outdoor non-residential uses. The Project does not involve any of these prohibited uses. Hazards to flight are prohibited in Compatibility Zone C1 and Zone D. Relevant to the Project, this includes physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations. Additionally, land use development that may cause the attraction of birds to increase is also prohibited. As further discussed below, the Project incorporates mitigation measures MM Haz 2 through MM Haz 6, which reflect the PVCCSP Standards and Guidelines addressing MARB/IP Airport requirements outlined in the ALUCP, including these hazards to flight.

Section 4.12, Noise, of this EIR addresses noise exposure for MARB/IP Airport operations. As identified, Compatibility Zones C1 and D are considered to have a moderate to low noise impact. The majority of the Project area is within the 55 dBA CNEL contour with a portion of the western part of the Rider 2 site within 60 dBA CNEL contour. The Governor's Office of Planning and Research (OPR) Land Use Compatibility for Community Noise Exposure indicate that industrial uses, such as the Project, are considered normally acceptable with exterior noise levels of up to 70 dBA CNEL. The Project would not expose people working at the proposed Rider 2 and Rider 4 buildings to excessive noise levels from airport operations.

The Project area is within the FAR Part 77 Military Outer Horizontal Surface Limits. The proposed Rider 2 and Rider 4 buildings would have a maximum building height of approximately 44 feet 10 inches and would be up to approximately 1,495 feet above mean sea level (msl), which is below the maximum height of 1,565 above msl, which is the Part 77 surface limit for military and civilian aircraft. However, certain construction equipment could extend to heights that exceed 1,565 feet above msl. PVCCSP EIR MM Haz 6 is incorporated into the Project, which requires that FAA Form 7460-1, Notice of Proposed Construction or Alteration, be submitted to the FAA. A determination of no hazard to air navigation is required.

The proposed warehouse uses would not involve an electromagnetic radiation component and would not conflict with MARB/IP Airport operations or radio communications (e.g., microwave transmission in conjunction with a cellular tower, radio wave transmission in conjunction with remote equipment). Further, PVCCSP EIR mitigation measure MM Haz 2 requires the Applicant to convey an aviation easement to the MARB/IP Airport Authority, mitigation measure MM Haz 3 requires that outdoor lighting be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane, and, mitigation measure MM Haz 4 requires that all potential purchasers and tenants be notified that the property is located in the vicinity of an airport, within an AIA.

Based on the analysis presented above, and with incorporation of PVCCSP EIR mitigation measure MM Haz 2 through mitigation measure MM Haz 6, the Project would not result in a conflict with any of the policies or requirements outlined in the MARB/IP ALUCP. Because the ALUCP is intended to minimize potential hazards associated with the MARB/IP Airport, it is concluded that the Project would not result in a safety hazard for people residing or excessive noise for people working in the Project area. Accordingly, impacts would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

Threshold f Would the project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The City of Perris participates in the County of Riverside Multi-Jurisdictional Hazard Mitigation Plan (MHMP), which outlines requirements for emergency access and standards for emergency responses (County of Riverside EMD, 2018). The PVCCSP EIR Initial Study (Section 9, Hazards and Hazardous Materials) concluded that because emergency access would be maintained and improved throughout the PVCCSP area in accordance with the MHMP, development within the PVCCSP would not interfere with adopted emergency response plans.

Implementation of the Project would include roadway improvements along Morgan Street and Rider Street, which would be consistent with the requirements of the PVCCSP. Redlands Avenue is currently being constructed in conjunction with previously approved development to the west. Emergency access to the Project would be provided via driveways along Morgan Street, Redlands Avenue, Rider Street, and Sinclair Street. Implementation of the circulation system pursuant to the PVCCSP would improve emergency access to the site and the area. Accordingly, operation of the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.

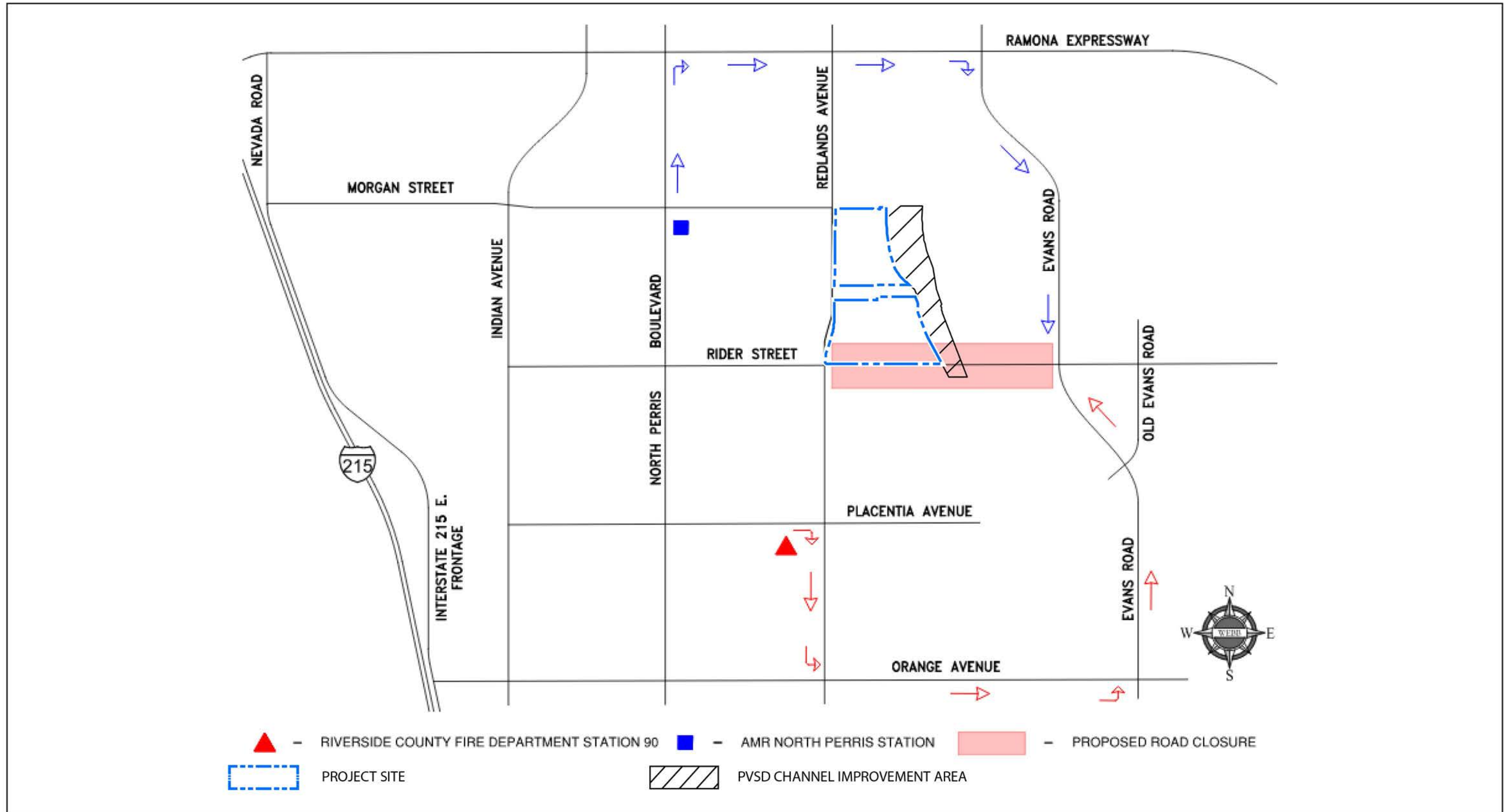
Should the Rider Street bridge construction occur in two stages, east-west access would be maintained continuously during the construction period. Construction of the Rider Street bridge in one stage, which is expected to last approximately 9 months, would require a full closure of Rider Street, preventing east-west travel along this roadway. Detours to get to the east or west side of the PVSD Channel would be accommodated by routes using Ramona Expressway to the north or Orange Avenue to the south (refer to Figure 4.9-2, *Emergency Vehicle Station Location and Detour Routes*). The detour routes appear to be viable routes to the east side of the Rider Street closure, including for emergency vehicles. (Webb, 2020) With the availability of a detour route that effectively accommodates east-west travel while Rider Street is closed, construction of the Project and temporary closure of the Rider Street bridge would not impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.



Source(s): Webb Associates (04-29-2020)

Figure 4.9-2



Emergency Vehicle Station Location and Detour Routes

Threshold g Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

As identified in the PVCCSP EIR Initial Study (Section 9, Hazards and Hazardous Materials), the PVCCSP area, including the Project area, is not adjacent to any wildlands or undeveloped hillsides where wildland fires would be expected to occur, and the City’s General Plan does not designate the PVCCSP area as being at risk from wildfires. Also, according to the California Department of Forestry and Fire Protection (Cal Fire) the Project area is not located in a “Very High Fire Hazard Severity Zone” (CAL FIRE, 2009). No wildlands are located on the Project area and the Project area is surrounded by developed properties, paved roads, and maintained vacant sites. Accordingly, implementation of the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires and no impact would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

No impact would occur.

4.9.5 CUMULATIVE IMPACTS

The cumulative study area associated with hazardous materials is typically site-specific except where past, present, and/or proposed land uses would impact off-site land uses and persons or where past, present, or foreseeable future development in the surrounding area would cumulatively expose a greater number of persons to hazards (e.g., hazardous materials and/or waste contamination). Although the future occupants of the Project’s proposed buildings are not presently known, if businesses that use or store hazardous materials occupy the Project area, the business owners and operators would be required to comply with all applicable federal, state, and local regulations to ensure proper use, storage, and disposal of hazardous substances. Such uses also would be subject to review and permitting requirements by the City of Perris or other oversight agencies, as appropriate. Similarly, any other developments in the area proposing the construction of uses with the potential for use, storage, or transport of hazardous materials also would be required to comply with applicable federal, state, and local regulations, and such uses would also be subject to review and permitting requirements by the City of Perris or other oversight agencies, as appropriate. Further, contractors would be required to comply with applicable regulations during construction, and RCFC&WCD would be required to comply with applicable regulations during continued operation/maintenance of the PVSD Channel. Therefore, the potential for release of toxic substances or hazardous materials into the environment, either through accidents or due to routine transport, use, or disposal of such materials, would be less than significant for the Project and development in the surrounding area. Accordingly, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to hazardous materials.

The Project area is not located within ¼-mile of an existing or planned school; therefore, the Project would not contribute to a cumulatively significant hazards/hazardous materials impact on any public or private schools located within ¼-mile of the site.

The Project area is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. In the unlikely event that, hazardous materials are encountered beneath the surface of the site during grading or construction, the materials would be handled and disposed of in accordance with regulatory requirements. Therefore, the Project would not contribute to a cumulatively significant hazardous materials impact associated with a listed hazardous materials site.

The Project area is within the AIA for MARB/IP Airport and would not conflict with requirements outlined in the MARB/IP ALUCP, PVCCSP, and PVCCSP EIR. The Project would have a less than significant impact related to the potential to result in a safety hazard or excessive noise for people residing or working in the Project area. Cumulative development within the March ARB/IPA's AIA would similarly be required to demonstrate consistency with the MARB/IP ALUCP and adhere to requirements outlined in the PVCCSP and PVCCSP EIR (for projects in the PVCCSP area). Therefore, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to aviation hazards.

The Project would involve implementation of roadway and site access improvements and would not impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan area (i.e., the County of Riverside MHMP). Similarly, cumulative development in proximity to the Project area would be implemented in compliance with PVCCSP, including the construction of required roadways and site access. The Project would not contribute to any cumulative impacts associated with an adopted emergency response plan or emergency evacuation plan.

The Project area is not located within or in proximity to areas identified as being subject to wildland fire hazards. Additionally, surrounding areas that are currently vacant would be developed in a manner consistent with jurisdictional requirements for fire protection, and would generally decrease the fire hazard potential in the local area. As such, fire hazards are anticipated to decline over time, and the Project would not contribute to any cumulative impacts related to wildland fires.

4.9.6 REFERENCES

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RCDEH, 2020. Riverside County Department of Environmental Health website. *Hazardous Materials (HazMat)*. Accessed on March 1, 2020. Available at <https://www.rivcoeh.org/OurServices/HazardousMaterials>

Webb, 2020. *Rider Street Bridge Detour Travel Time Analysis*. Included in Appendix L of this EIR.

4.10 HYDROLOGY AND WATER QUALITY

This section identifies and evaluates the Project's potential to have adverse hydrology and water quality effects. Information presented in this section is primarily based on the following technical reports, which are included in their entirety in Appendix J of this EIR. References used in this section are listed in Section 4.10.7, References.

- Albert A. Webb Associates, Inc (Webb). 2018. *Rider Distribution Center II Design Review/Case No: 19-00004 City of Perris, Riverside County, California, Preliminary Drainage Study*. May 2018.
- Albert A. Webb Associates, Inc. (Webb). 2019a. *Project Specific Water Quality Management Plan Rider Distribution Center II*. July 2019.
- Albert A Webb Associates, Inc. (Webb). 2019b. *Rider Distribution Center IV Design Review/Case No: 19-00006 City of Perris, Riverside County, California, Preliminary Drainage Study*. April 2019.
- Albert A. Webb Associates, Inc. (Webb). 2019c. *Project Specific Water Quality Management Plan Rider IV Distribution Center*. August 2019.

There were no comments received on the Notice of Preparation or at the November 6, 2019 Environmental Impact Report (EIR) public scoping meeting regarding hydrology and water quality.

4.10.1 EXISTING SETTING

Section 4.7, Hydrology and Water Quality, of the Perris Valley Commerce Center Specific Plan (PVCCSP) Environmental Impact Report (EIR), includes a detailed discussion of the current environmental setting, which includes information related to the following hydrology and water quality issues: setting, surface water resources, groundwater resources, and storm drain facilities. The following discussion focuses on information that is particularly relevant to the Project, information that is new or updated since the PVCCSP EIR was prepared, or information that is Project-site specific.

Watershed Description

The Project area is in the San Jacinto Watershed, which is part of the larger Santa Ana River Watershed. The 24 mile long San Jacinto River is the main drainage feature in this watershed and flows from the San Jacinto Mountains, across the San Jacinto Valley, through the City of Perris, to Railroad Canyon Reservoir, and finally to its terminus in Lake Elsinore, southwest of Perris (Figure 4.7-1, Hydrology Map, of the PVCCSP EIR). Lake Elsinore discharges into Temescal Wash, which is tributary to the Santa Ana River, which ultimately drains into the Pacific Ocean.

Hydrology and Water Quality Setting

The PVCCSP area, which includes the Project area, is relatively flat and generally slopes in a southeasterly direction towards the Perris Valley Storm Drain Channel (PVSD Channel), which is located along the eastern portion of the Project area. Existing City storm drains flow laterally into the PVSD Channel from east to west and transport the flows through Perris Valley to Reach 3 of the San Jacinto River near I-215.

Under existing conditions, storm water sheet flows across the Project area in a southeasterly direction towards the PVSD Channel and Rider Street. The backbone drainage facility for the Rider 2 site is the existing Perris Valley Channel Master Drainage Plan (PVCMDP) storm drain Lateral A-B in Rider Street, which was designed to account for the fully developed condition of the tributary watershed it serves, including the Rider 2 site. Lateral A-B, which consists of an 8-foot by 7-foot reinforced concrete box (RCB), conveys storm water to the PVSD Channel to the east. Storm water runoff from the Rider 4 site currently sheet flows to the southeast corner of the site and into the PVSD Channel; there are no other storm drain facilities for the Rider 4 site. The planned backbone drainage facility for the Rider 4 site is the PVCMDP storm drain Lateral G-2, which will ultimately flow to the PVSD Channel to the east.

Under existing conditions, the Project area has been divided into two drainage management areas (DMAs), which are each identified as DMA-A in the respective Water Quality Management Plans (WQMPs) for the Rider 2 and Rider 4 sites (see Appendix J). One DMA includes the Rider 4 site, is located north of Sinclair Street, and excludes the PVSD Channel. The other DMA includes the Rider 2 site, excluding the PVSD Channel.

Under existing conditions, the western portion of the Project area (the Rider 2 and Rider 4 sites) are disturbed and undeveloped, and the eastern portion of the Project area contains an existing segment of the PVSD Channel. The primary pollutant of concern for the existing site condition is sediment from erosion. There are no structural or non-structural best management practices in place within the Project area.

Floodplain

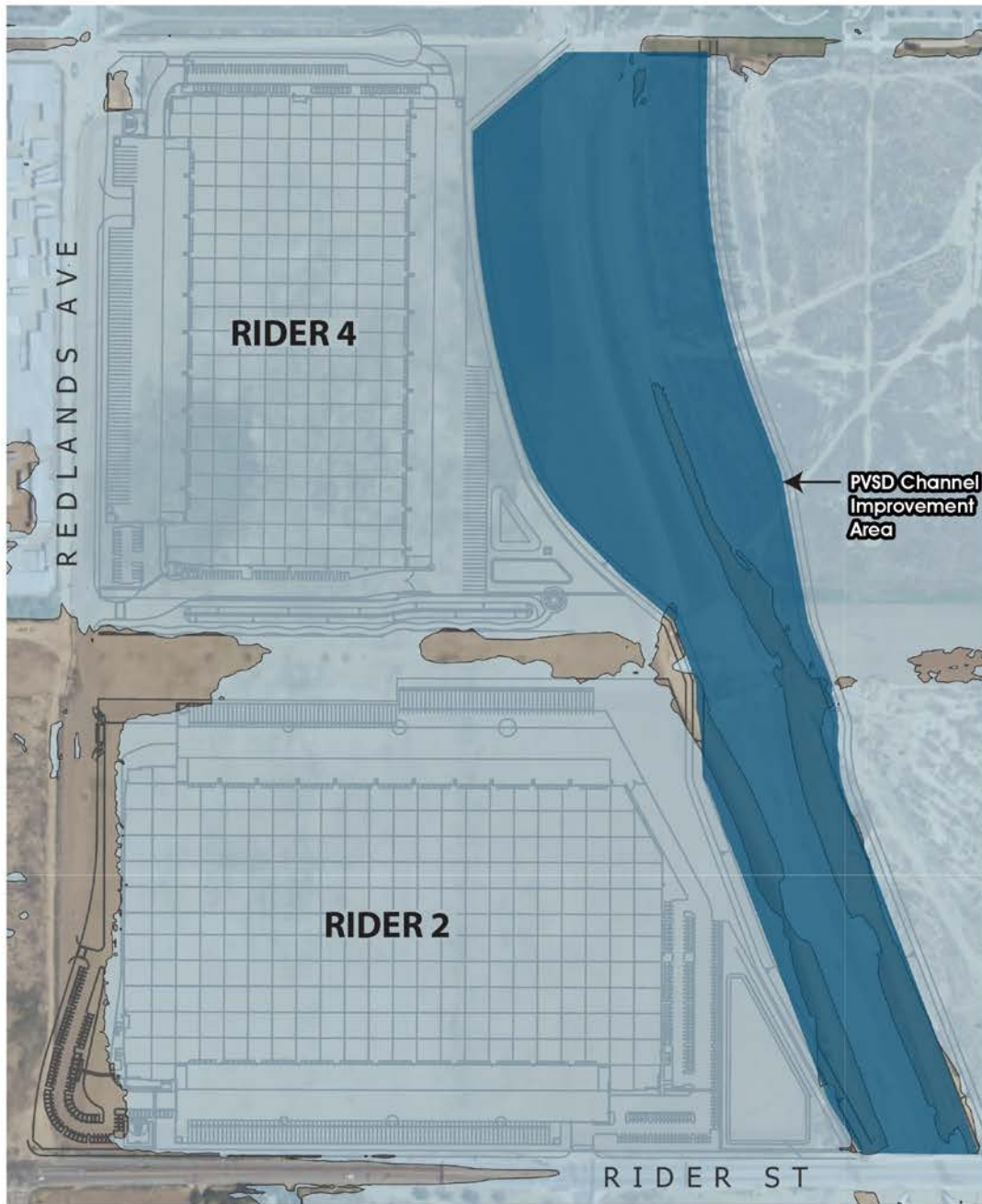
Due to the area's relatively flat terrain and the lack of regional drainage infrastructure, flooding may occur in both major and minor storm events. During larger storm events, runoff creates flooding through the PVCCSP area and flows through the Project area toward the PVSD Channel. As identified in the PVCCSP EIR, and shown on Figure 4.10-1, Existing and Proposed Floodplain Delineation, the Project area is located within a designated 100-year floodplain. Specifically, most of the Project area is located within Federal Emergency Management Agency (FEMA) Flood Hazard Zone AE, which indicates that an area is subject to inundation by the 1-percent annual chance flood event (100-year flood event). Because the Project area is currently located in a designated 100-year flood hazard area, a Conditional Letter of Map Revision (CLOMR¹) and Letter of Map Revision (LOMR²) from FEMA would be required prior to development, as further discussed under the analysis of Threshold "d".

Groundwater



As discussed in the PVCCSP EIR and the Initial Study for the Project included in Appendix A, the PVCCSP area, including the Project area, is located within the Eastern Municipal Water District's (EMWD's) Perris North Groundwater Management Zone of the West San Jacinto Groundwater Sub-basin. During soil sampling conducted for the Project, groundwater was encountered at a depth of approximately 33 feet at the Rider 2 site, and 34 feet at the Rider 4 site. Based on the water level measurements and the moisture contents of the recovered soil samples, the static groundwater table is

¹ A CLOMR is FEMA's comment on a proposed project that would, upon construction, result in the modification of the existing regulatory floodway.

² A LOMR is FEMA's official modification to an effective FIRM. LOMRs can result in a physical change to the existing regulatory floodway.



Legend

- Sites
-  Flood Extents with Proposed Channel
-  Flood Extents with Existing Channel

Source(s): Webb Associates (10-03-2019)

Figure 4.10-1



Not to Scale

Existing and Proposed Floodplain Delineation

considered to have existed at these depth below existing site grades at the time of the subsurface investigations. Based on data from a monitoring well located approximately 0.9 mile from the Rider 2 site and 0.75 mile from the Rider 4 site, a high groundwater depth of approximately 26 feet was reported and is considered to be conservative with respect to recent site conditions (SCG, 2019a; SCG, 2019b).

4.10.2 EXISTING POLICIES AND REGULATIONS

Section 4.7 of the PVCCSP EIR provides a complete discussion of the regulatory framework for the analysis of hydrology and water quality impacts, as identified below. Following is a discussion of regulations that are specifically relevant to the Project and includes information that is new or has been updated since the PVCCSP EIR was prepared. It should be noted that development of the Project is also required to comply with Design Standards and Guidelines of the PVCCSP related to hydrology and water quality (these are identified in Section 4.10.4, of this section).

Federal

Clean Water Act

As discussed in the PVCCSP EIR, the Federal Water Pollution Control Act (commonly known as the Clean Water Act [CWA]) requires States to conduct water quality assessments of water resources. These assessments are used to identify water bodies that do not meet water quality standards, and which are placed on a list of impaired waters pursuant to Section 303(d) of the CWA. In 1972, the CWA was amended to require National Pollutant Discharge Elimination System (NPDES) permits for the discharge of pollutants to “waters of the U.S.” from any point source. In 1987, the CWA was amended again to require that the U.S. Environmental Protection Agency (USEPA) establish regulations for permitting under the NPDES permit program of municipal and industrial storm water discharges. On November 16, 1990, the USEPA published final regulations for storm water discharges associated with industrial activity, for construction activities on five acres or more, and from large municipal separate storm sewer systems (MS4). An MS4 is a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains). MS4s are owned or operated by a public body that has jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes. The MS4s are only designated or used for collecting or conveying storm water (i.e., not wastewater or combined sewage). In 1998, individual NPDES permits were required for storm water discharges associated with industrial activities. In 1999, regulations were adopted to address storm water discharges from small MS4s and construction sites that are one acre or more.

In addition, the CWA requires states to adopt water quality standards for water bodies and have those standards approved by the USEPA. Water quality standards consist of designated beneficial uses for a water body (e.g., wildlife habitat, agricultural supply, fishing), along with the water quality criteria necessary to support those uses. Water quality criteria are prescribed concentrations or levels of constituents—such as lead, suspended sediment, and fecal coliform bacteria—or narrative statements that represent the quality of water that supports a particular use. Because California has not established a complete list of acceptable water quality criteria, the USEPA established numeric criteria for priority toxic pollutants in the form of the California Toxics Rule (CTR) (see 40 *Code of Federal Regulations* [CFR] 131.38).

State/Regional

The PVCCSP EIR addresses the following: the California Water Code, the California Health and Safety Code, the California Fish and Game Code, the California Harbors and Navigation Code, and the California Food and Agriculture Code. Following is a discussion of the programs particularly relevant to the Project.

California Water Code

The California Water Code is the principal State law regulating water quality in California. The other codes mentioned contain water quality provisions that require compliance. The CWA places the primary responsibility for the control of water pollution and for planning the development and use of water resources with the States, although it does establish certain guidelines for States to follow in developing their programs. California's primary statute governing water quality and water pollution issues is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act) (California Water Code, Division 7). The Porter-Cologne Act establishes waste discharge requirements, water quality control planning and monitoring, enforcement of discharge requirements, and ground and surface water quality objectives. It also prevents waste and unreasonable use of water, and it adjudicates water rights. It directs each Regional Water Quality Control Board (RWQCB) to develop a Water Quality Control Plan (Basin Plan) for all areas within its region. The Basin Plan serves as the basis for each RWQCB's regulatory programs. The Project area is located within the purview of the Santa Ana RWQCB (Region 8), and must comply with applicable elements of the region's Santa Ana River Basin Plan (discussed below), the Porter-Cologne Water Quality Control Act, and the CWA. Following is a discussion of water quality regulations particularly relevant to the Project.

Water Quality Control Plan for the Santa Ana River Basin

The Santa Ana RWQCB Water Quality Control Plan for the Santa Ana River Basin (Basin Plan) was originally adopted in 2005 and has been subsequently amended through June 2019 (RWQCB, 2019). The Basin Plan is designed to preserve and enhance water quality and to protect the beneficial uses of all regional waters. Specifically, the Basin Plan: 1) designates beneficial uses for surface and subsurface waters (groundwater); 2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and to conform to the State's anti-degradation policy; 3) describes the implementation plan to achieve water quality objectives and to protect the beneficial uses of all waters in the region; 4) describes the comprehensive monitoring and assessment program used to evaluate the effectiveness of the Basin Plan; and 5) provides an overview of water resource management studies and projects which are in progress in the region. Additionally, the Basin Plan incorporates by reference all applicable State and Regional Board plans and policies.

The Basin Plan establishes or designates beneficial uses and water quality objectives for all the ground and surface waters in the region. Beneficial uses are the uses of water necessary for the survival and well-being of humans, plants, and wildlife. These uses serve to promote the tangible and intangible economic, social, and environmental goals. Water quality objectives are the levels of water quality constituents or characteristics that must be met to protect beneficial uses. The Basin Plan for the Santa Ana River Basin also establishes an implementation program that describes the actions that the Santa Ana RWQCB and others must achieve and maintain for the designated beneficial uses and water quality objectives of the region's waters.

Water bodies that do not meet water quality standards are deemed “impaired” and, under Section 303(d) of the CWA, are placed on a list of impaired waters for which a Total Maximum Daily Load (TMDL) must be developed for the impairing pollutant(s). A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality standards (with a “factor of safety” included). Once established, the TMDL is allocated among current and future pollutant sources to the water body. TMDLs must consider and include allocations to both point sources and non-point sources of listed pollutants. Table 4.10-1, Receiving Waters Tributary to the Project Area, indicates that the Basin Plan’s beneficial use designations for the receiving waters that the Project is tributary to (in order of upstream to downstream) as well as the 303(d) listed impairment (if any).

The definitions of the beneficial uses applicable to the Project area are as follows (RWQCB, 2019):

- **Municipal and Domestic Supply (MUN):** Uses of water for community, military, municipal, or individual water supply systems including, but not limited to, drinking water supply.
- **Agricultural Supply (AGR):** Uses of water for farming, horticulture, or ranching including, but not limited to, irrigation, stock watering, or support of vegetation for range grazing.
- **Groundwater Recharge (GWR):** Uses of water for natural or artificial recharge of groundwater for purposes including, but not limited to, future extraction, maintaining water quality, or halting of saltwater intrusion into freshwater aquifers.
- **Water Contact Recreation (REC1):** Uses of water for recreational activities involving bodily contact with water where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and scuba diving, surfing, white water activities, fishing, or use of natural hot springs.
- **Non-Contact Water Recreation (REC2):** Uses of water for recreational activities involving proximity to water, but not normally involving bodily contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.
- **Warm Freshwater Habitat (WARM):** Uses of water that support warm water ecosystems including, but not limited to, preservation and enhancement of aquatic habitats, vegetation habitats, and fish and wildlife habitats (including invertebrates).
- **Wildlife Habitat (WILD):** Uses of water that support wildlife habitat including, but not limited to, preservation and enhancement of vegetation and prey species used by waterfowl and other wildlife water.

Table 4.10-1 Receiving Waters Tributary to the Project Area

Receiving Waters	EPA Approved 303(d) List Impairments	Designated Beneficial Uses	Proximity to RARE Beneficial Use
Perris Valley Storm Drain	None	None	Not a water body classified as RARE
San Jacinto River (Reach 3)	None	MUN, AGR, GWR, REC1, REC2, WARM, WILD	Not a water body classified as RARE
San Jacinto River (Reach 2)	None	MUN, AGR, GWR, REC1, REC2, WARM, WILD	Not a water body classified as RARE
Canyon Lake	Nutrients, Pathogens	MUN, AGR, GWR, REC1, REC2, WARM, WILD	Not a water body classified as RARE
San Jacinto River (Reach 1)	None	MUN, AGR, GWR, REC1, REC2, WARM, WILD	Not a water body classified as RARE
Lake Elsinore	PCBs, Organic Compounds, Nutrients, Organic Enrichment (Low DO), Sediment Toxicity, Unknown Toxicity	REC1, REC2, WARM, WILD	Not a water body classified as RARE

Source: (Webb, 2019a; Webb, 2019c, Table A.1)

National Pollutant Discharge Elimination System Municipal Separate Storm Sewer System Permit

On January 29, 2010, the Santa Ana RWQCB issued the NPDES Permit and Waste Discharge Requirements for the Riverside County Flood Control and Water Conservation District (RCFC&WCD), the County of Riverside, and the Incorporated Cities of Riverside County Within the Santa Ana Region (Order No. R8-2010-0033 and NPDES No. CAS 618033). Order No. R8-2010-0033, which remains in effect until the effective date of a new permit, regulates the way the Permittees manage urban runoff in the Santa Ana Region. This order renews Order No. R8-2002-001 and regulates discharges of urban runoff from the MS4s in the Riverside County portion of the Santa Ana Region. As part of the permit application, the Permittees submitted a revised Drainage Area Management Plan that contained programs, policies, and Best Management Practices (BMPs) to achieve the water quality standards in receiving waters. The City of Perris, as a co-permittee is responsible for implementing MS4 permits in Region 8.

Sustainable Groundwater Management Act (SGMA)

The 2014 Sustainable Groundwater Management Act (SGMA) requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under SGMA, these basins should reach sustainability within 20 years of implementing their sustainability plans. The DWR categorizes the priority of groundwater basins. For critically over-drafted basins, that will be 2040. For the remaining high and medium priority basins, 2042 is the deadline. The SGMA also requires local public agencies and Groundwater Sustainability Agencies (GSAs) in high- and medium-priority basins to develop and implement Groundwater Sustainability Plans (GSPs) or Alternatives to GSPs. GSPs are detailed road maps for how groundwater basins will reach long term sustainability (DWR, 2019).

Riverside County Drainage Area Management Plan – Santa Ana Region

In compliance with the requirements of the Santa Ana Region MS4 Permit, the Riverside County Drainage Area Management Plan – Santa Ana Region (DAMP) (last updated in June 2017) was developed by the Riverside County Flood Control and Water Conservation District (RCFC&WCD) to provide guidance to permittees on the development and implementation of Local Implementation Plans (LIPs) (RCFCWCD, 2017). The Riverside County DAMP, which is applicable to the Santa Ana Watershed region of Riverside County, describes the program elements needed to comply with the MS4 Permit. It addresses the development of local storm water ordinances, grading/erosion ordinances, and litter/trash control ordinances, including illicit connections and illegal discharges. The requirements for post-construction urban runoff from new development and significant redevelopment projects through a WQMP, operation and maintenance of the MS4, and commercial and industrial facility inspection programs are also addressed. In June 2017, the DAMP was updated to include the approval of the Watershed Action Plan and its supporting documents.

Riverside County Water Quality Management Plan

The MS4 Permit and DAMP require new development and significant redevelopment projects to prepare WQMPs for managing the quality of storm water or urban runoff that flows from a project site after construction is completed and after the facilities or structures are occupied and/or operational. A WQMP is required to reduce or eliminate water pollution in urban runoff that flows from storm water drainage systems into receiving waters. A WQMP must describe the site design, source-control, and treatment-control BMPs that will be implemented and maintained throughout the life of a project. The WQMP must include a statement that the project would implement appropriately sized treatment-control BMPs targeted to address the pollutants of concern and to achieve the required level of treatment either singly or in combination. On October 22, 2012, the Executive Officer of the Santa Ana RWQCB approved the Water Quality Management Plan Guidance and Template for the Santa Ana Region of Riverside County; the guidance was updated in June 2016. The Riverside County WQMP addresses post construction urban runoff from new development and redevelopment projects in the Santa Ana River Watershed. It requires that Low Impact Development (LID) retention BMPs (e.g., infiltration, harvest and use, evapotranspiration, and/or bio-treatment) to be used unless it can be shown that these BMPs are infeasible.

National Pollutant Discharge Elimination System Construction General Permit

Pursuant to Section 402(p) of the CWA, which requires regulations for permitting of certain storm water discharges, the State Water Resources Control Board (SWRCB) has issued a statewide general NPDES Permit for storm water discharges from construction sites ([NPDES No. CAS000002] Water Quality Order 2009-0009-DWQ.³ Under this Construction General Permit, storm water discharges from construction sites with a disturbed area of one acre or more are required to either obtain individual NPDES permits for storm water discharges or to be covered by the Construction General Permit. Coverage under the Construction General Permit is accomplished by determining the risk level of the construction site and by

³ NPDES No. CAS000002, Water Quality Order 2009 0009 DWQ, SWRCB NPDES General Permit for Storm Water Discharges Associated with Construction Activity (adopted by the SWRCB on September 2, 2009, and effective on July 1, 2010). This order was amended by 2010-0014-DWQ, which became effective on February 14, 2011, and 2012-0006-DWQ, which became effective on July 17, 2012. In accordance with the language set forth in Order No. 2009-0009-DWQ, this permit has been administratively extended indefinitely.

preparing a Storm Water Pollution Prevention Plan (SWPPP) that includes a site evaluation and assessment, BMPs to be implemented at the construction site, and an inspection program. The SWPPP should also outline the monitoring and sampling program to verify compliance with discharge Numeric Action Levels (NALs) according to the Risk Level for the site, as set by the Construction General Permit. The primary objective of the SWPPP is to ensure that the responsible party properly construct, implement, and maintain BMPs to reduce or eliminate pollutants in storm water discharges and authorized non-storm water discharges from the construction site. Permit Registration Documents (SWPPP, Notice of Intent, and other documents), as well as annual reports, Notice of Terminations, and NAL exceedance reports, must be electronically submitted to the SWRCB and the permit fee mailed to the SWRCB for Construction General Permit coverage.

Riverside County Master Drainage and Area Drainage Plans

The RCFC&WCD prepares Master Drainage Plans (MDPs) to address the current and future drainage needs of various communities in Riverside County. MDP boundaries generally follow regional watershed limits. The MDPs provide a conceptual plan of proposed drainage facilities that may include channels, storm drains, levees, basins, dams, or any other conveyance capable of economically relieving flooding problems within the plan area. The MDPs also include an estimate of facility capacity, sizes, and costs. The Perris Valley Master Drainage Plan (PVMDP) was adopted by the Riverside County Flood Control & Water Conservation District (RCFC&WCD) in July 1987, was revised in June 1991 to merge the Lower Perris MDP and PVMDP, and addresses drainage infrastructure required for the 38-square-mile Perris Valley area (RCFC&WCD, 1991a). The infrastructure plans associated with the PVCCSP involve modifications to the PVMDP. The Perris Valley Channel Master Drainage Plan (PVCMDP) was adopted in October 1989 and addresses drainage needs along the PVSD Channel, which flows to the San Jacinto River (RCFC&WCD, 1989). The PVCMDP serves as long-term guide to the design and construction of the ultimate channel, and identifies the sizing and location of local drainage facilities to be constructed by developers and others within the area. The PVCCSP also anticipates the construction of other adopted PVMDP facilities to accommodate the 100-year storm flows in the area.

An Area Drainage Plan (ADP) is an implementing tool that identifies the storm drainage improvements for flood protection in the watershed, estimates the costs of constructing these improvements, and sets drainage fees to be collected from properties in the area covered by the plan and to be used for funding the construction of the drainage facilities. The Perris Valley ADP was adopted in July 1987 and revised in June 1991. The 1991 revisions included a slight change in the boundaries of the plan, adding completed storm drain facilities, and revising the fee allocation. The Perris Valley ADP includes storm drains 48 inches in diameter or larger, with smaller facilities to be constructed as part of individual development projects (RCFC&WCD, 1991b). Drainage fees are paid at the time of tentative map recordation or the grading/building permit stage.

Since 1991, additional storm drainage improvements have been built in the area. Also, as identified in the PVCCSP and associated EIR, an updated PVMDP will be needed to meet the PVCC development goals. The PVCCSP identifies a number of modifications to the PVMDP to provide flood protection to surrounding properties and roadways in the PVCCSP area. The City approved these improvements with adoption of the PVCCSP.

In addition to the modifications identified in the PVCCSP, other drainage facilities identified in PVMDP as well as channel improvements outlined in the PVSCMD need to be constructed. It is anticipated that

drainage facilities would be constructed in conjunction with future development projects within the PVCCSP area. Relevant to the Project, this includes the improvements to the PVSD Channel and Line G, which extends in an east-west direction between the Rider 2 and Rider 4 sites and discharges to the PVSD Channel within the Project area. These facilities are required to accommodate developed 100-year storm flows and would be implemented as part of the Project.

Local

City of Perris Municipal Code

As identified in the PVCCSP EIR, the City of Perris Municipal Code identifies policies related to storm water runoff management. The specific Municipal Code policy that is relevant to the Project is as follows:

Chapter 14.22 Stormwater/Urban Runoff Management and Discharge Control. The intent of this chapter is to protect and enhance the water quality of water courses, water bodies, groundwater, wetlands, and regional receiving waters in the City, pursuant to and consistent with the Federal Clean Water Act (33 United States Code [USC], Section 1342) and California Regional Water Quality Control Board NPDES Permit No. CAS 618033, Order No. R8-2002-0011, and any amendment, revision or re-issuance thereof (Ord. 1194 Section 3[part], 2006)⁴. This ordinance sets guidelines for:

- A. Prohibiting non-storm water discharges into the storm water conveyance system;
- B. Eliminating discharges into the storm water conveyance system from spills, dumping or disposal of materials other than storm water or permitted or exempted discharges;
- C. Reducing pollutants in storm water discharges, including those pollutants taken up by storm water as it flows over urban areas (urban runoff), to the maximum extent practicable; and
- D. Reducing pollutants in storm water discharges to achieve applicable water quality objectives for receiving waters within the city and Santa Ana River Watershed.

City of Perris General Plan

The General Plan Conservation Element identifies goals related to water quality. These goals and policies and a discussion of the Project's consistency are discussed in Table 4.11-2, *City of Perris General Plan Consistency Analysis*, in Section 4.11, Land Use and Planning.

4.10.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on hydrology and water quality if it will:

- a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;

⁴ As noted previously, Order No. 2010-0033 is the current NPDES Permit.

- 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:
 - Result in substantial erosion or siltation on or off site;
 - Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;
 - Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or
 - Impede or redirect flood flows;
- d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or
- e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

4.10.4 ENVIRONMENTAL IMPACTS

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to hydrology and water quality. These Standards and Guidelines (summarized below) are incorporated as part of the Project's Rider 2 and 4 site development (the warehouse component) and are assumed in the analysis presented in this section. The chapters/section numbers provided correspond to the PVCCSP chapters/sections. There are no MMs for hydrology and water quality included in the PVCCSP EIR.

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

4.2 On-Site Standards and Guidelines

4.2.1 General On-Site Project Development Standards and Guidelines

- Water Quality Management Plan
- Uses Affecting March Air Reserve Base: All retention and water quality basins shall be designed
- Easements on MWD Property

4.2.2 Site Layout for Commerce Zones

- 4.2.2.7 Water Quality Site Design

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

5.4 Off-Site Infrastructure Standards

5.4.4 Storm Drain Standards and Guidelines

- Riverside County Flood Control and Water Conservation District Standard
- Collect and Discharge Storm Water
- FEMA Floodplain
- On-Site Retention

Landscape Standards and Guidelines (Chapter 6.0 of the PVCCSP)

6.3 Planting Guidelines

- Erosion Control
- Positive Drainage to Street or Collection Device
- Concrete Gutters/Swales Are Prohibited Landscape Areas

Industrial Design Standards and Guidelines (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; Truck-Wells.

Applicable Standard Regulatory Requirements

Adherence to NPDES requirements is required of all development within the City and would reduce Project-related impacts related to water quality. BMPs have been incorporated into the Project in compliance with these standard regulatory requirements. Regulatory requirements (RRs) 10-1 through 10-4 would be incorporated into the Project's Mitigation Monitoring and Reporting Program to track implementation of these standard requirements.

- RR 10-1** Prior to grading plan approval and the issuance of a grading permit for the Rider 2 and Rider 4 developments and the PVSD Channel improvements, the Project proponent shall provide evidence to the City that a Notice of Intent (NOI) has been filed with the Regional Water Quality Control Board for coverage under the State National Pollutant Discharge Elimination System (NPDES) General Construction Permit for discharge of storm water associated with construction activities.

RR 10-2 Prior to grading plan approval and the first issuance of a grading permit by the City for the Rider 2 and Rider 4 developments and the PVSD Channel improvements, the Project proponent shall submit to the City of Perris a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP shall include a surface water control plan and erosion-control plan citing specific measures to control erosion during the entire grading and construction period. Additionally, the SWPPP shall identify structural and non-structural Best Management Practices (BMPs) to control sediment and nonvisible discharges from the site. BMPs to be implemented in the SWPPP may include (but shall not be limited to) the following:

- Sediment discharges from the site may be controlled by the following: sandbags; silt fences; straw wattles and temporary debris basins (if deemed necessary); and other discharge control devices. The construction and condition of the BMPs will be periodically inspected during construction, and repairs will be made when necessary as required by the SWPPP.
- No materials of any kind shall be placed in drainage ways.
- Materials that could contribute nonvisible pollutants to storm water must be contained, elevated, and placed in temporary storage containment areas.
- All loose piles of soil, silt, clay, sand, debris, and other earthen material shall be protected per RWQCB standards to eliminate any discharge from the site. Stockpiles will be surrounded by silt fences.
- The SWPPP will include inspection forms for routine monitoring of the site during the construction phase to ensure NPDES compliance.
- Additional BMPs and erosion-control measures will be documented in the SWPPP and utilized if necessary.
- The SWPPP will be kept on site for the entire duration of project construction and will also be available to the local RWQCB for inspection at any time.

In the event that it is not feasible to implement the above BMPs, the City of Perris can make a determination that other BMPs will provide equivalent or superior treatment either on or off site.

RR 10-3 Prior to issuance of grading permits for the Rider 2 and Rider 4 developments and the PVSD Channel improvements, the Project proponent shall provide evidence to the City that the following provisions have been added to construction contracts for the Project:

- The Construction Contractor shall be responsible for performing and documenting the application of BMPs identified in the SWPPP. Weekly inspections shall be performed on sediment-control measures called for in the SWPPP. Monthly reports shall be maintained by the Contractor and submitted to the City for inspection. In addition, the Contractor will also be required to maintain an inspection log and have the log on site to

be reviewed by the City of Perris and the representatives of the Regional Water Quality Control Board.

RR 10-4 Prior to grading plan approval and issuance of a grading permit by the City for the Rider 2 and Rider 4 developments, the Project proponent shall receive approval from the City of Perris for a Final Water Quality Management Plan (Final WQMP). The Final WQMP shall specifically identify pollution-prevention, site-design, source-control, and treatment-control BMPs that shall be used on site to control predictable pollutant runoff in order to reduce impacts to water quality to the maximum extent practicable. Source control BMPs to be implemented in the Final WQMP may include (but shall not be limited to) those listed in Table 4.10-3. Treatment-control BMPs shall include on-site detention/sand filtration basins to treat the site's runoff; these facilities shall be maintained and inspected at least twice per year and prior to October 1. Additional BMPs will be documented in the WQMP and utilized if necessary. In the event that it is not feasible to implement the BMPs identified in the Final WQMP, the City of Perris can make a determination that other BMPs shall provide equivalent or superior treatment either on or off site.

Impact Analysis

Threshold a Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

The PVCCSP EIR concludes that development of planned uses under the PVCCSP would result in increased storm water flows in the Specific Plan area. However, with implementation of site-specific WQMPs and the construction of on- and off-site storm drain facilities, impacts to the natural drainage pattern would not result in substantial erosion or siltation.

Preliminary Project-specific WQMPs for the Rider 2 Building and Rider 4 Building (included in Appendix J of this EIR) have been prepared for the Project and evaluate potential water quality impacts associated with post-construction permanent and site operational activities. The WQMPs were prepared to comply with the requirements of the City of Perris Water Quality Ordinance 1194, which revised Chapter 14.22 of the City of Perris Municipal Code, as discussed above.

Construction-Related Impacts

The Project would include the development of two warehouse buildings and includes the expansion of the existing PVSD Channel within the eastern portion of the Project area. Construction-related activities have the potential to result in impacts to water quality. The grading and construction phases would require the disturbance of surface soils and removal of the existing, limited vegetative cover. During the construction period, grading activities would result in exposure of soil to storm runoff, potentially causing erosion and sedimentation in runoff. Sediments also transport substances such as nutrients, hydrocarbons, and trace metals, which would be conveyed to the storm drain facilities and receiving waters. Substances such as fuels, oil and grease, solvents, paints and other building construction materials, wash water, and dust control water could also enter storm runoff and be transported to nearby waterways. This could potentially degrade the quality of the receiving waters and potentially result in the impairment of downstream water sources.

Construction activities for the Project would occur over an area more than one acre. Therefore, the Project (Rider 2 and Rider 4 developments and the PVSD Channel improvements) is required to obtain coverage under an NPDES permit. Construction impacts due to Project development would be minimized through compliance with the NPDES Construction General Permit, discussed above under Existing Policies and Regulations. As part of compliance with the NPDES requirements, a Notice of Intent (NOI) would be prepared and submitted to the SWRCB, and a Water Discharge Identification Number would be obtained prior to grading. This will provide notification and intent to comply with the State of California Construction General Permit. This permit requires the discharger to perform a risk assessment for the proposed development (with differing requirements based upon the determined risk level) and to prepare and implement an SWPPP, which must include erosion-control and sediment-control best management practices (BMPs) that would meet or exceed measures required by the determined risk level of the construction site, in addition to tracking control, waste management, and site BMPs that control the other potential construction-related pollutants. These measures may include the use of gravel bags, silt fences, straw wattles, hay bales, check dams, hydroseed, or soil binders. The construction contractor would be required to operate and maintain these BMPs throughout the duration of on-site construction activities. A Construction Site Monitoring Program that identifies monitoring and sampling requirements during construction is a required component of the SWPPP. In addition, the construction contractor would be required to maintain an inspection log and have the log on site to be reviewed by the City and representatives of the RWQCB.

The NPDES permit program was established under Section 402 of the CWA, which prohibits the unauthorized discharge of pollutants, including municipal, commercial, and industrial wastewater discharges. An NPDES permit would generally specify an acceptable level of pollutants or pollutant parameters in a discharge. The permittee may choose which technologies to use to achieve that level. Some permits however do contain generic BMPs. Table 4.10-2, Construction Activity Best Management Practices, lists BMPs for runoff control, sediment control, erosion control, and housekeeping that may be used during the construction phase of the Project.

Table 4.10-2 Construction Activity Best Management Practices

Runoff Control	Sediment Control	Erosion Control	Good Housekeeping
Temporary diversion dikes	Install perimeter controls (e.g., silt fences)	Chemical stabilization	Create waste collection area
Preserve natural vegetation	Install sediment-trapping devices (e.g., straw wattles, hay bales, gravel bags)	Dust control	Put lids on containers
Stabilize drainage ways	Inlet protection (e.g., check dams)	Construction sequencing	Clean up spills immediately
Source: (EPA, 2018)			

The construction-phase BMPs would ensure effective control of not only sediment discharge, but also of pollutants associated with sediments (e.g., nutrients, hydrocarbons, and trace metals). Mandatory compliance with regulatory requirements for the protection of water quality during construction (refer to regulatory requirements (RR 10-1 through RR 10-3), including implementation of a SWPPP, would ensure that the Project does not violate any water quality standards or waste discharge requirements during construction activities. Therefore, water quality impacts associated with construction activities would be less than significant.

Operational Water Quality Impacts

Under existing conditions, the western portion of the Project area, consisting of the Rider 2 and Rider 4 sites, is disturbed and undeveloped and the eastern portion of the site contains a segment of the existing PVSD Channel. Development of the proposed Rider 2 and Rider 4 buildings and associated improvements would result in the conversion of existing on-site permeable surfaces to impermeable surfaces. The water runoff from impervious surfaces, including the proposed building, roadways, landscaped areas, and parking lots, may carry a variety of pollutants. Potential water pollutants that could be generated at the Project area in its post-development condition include the following:

- Bacterial Indicators
- Heavy metals (parking lots and loading docks)
- Nutrients (landscaping)
- Pesticides (parking lots and loading docks)
- Toxic Organic Compounds
- Sediments (landscaping)
- Trash and Debris (waste containers and parking lots)
- Oxygen Demanding Substances (parking lots and loading docks)
- Oil and Grease (parking lots and loading docks)

A “pollutant of concern” is water pollutant that is also an impairment to the receiving water body. Based on the Project-specific WQMPs (included in Appendix J of this EIR), the Project’s potential pollutants of concern include: bacterial indicators, metals, nutrients, pesticides, toxic organic compounds (TOCs), sediments, trash and debris, and oil and grease. These pollutants may lead to the degradation of storm water quality in downstream water bodies. It should be noted that there would be a reduction in sediments with implementation of the Project as landscaped areas, impervious surfaces, and BMPs would reduce suspended sediment in runoff compared to the undeveloped existing condition.

Pollutant concentrations in urban runoff are extremely variable and are dependent on storm intensity, land use, elapsed time since previous storms, and the volume of runoff generated in a specific area that reaches a receiving water. As such, potential water quality impacts are related to the increase in the peak runoff, new urban uses, and the sensitivity of the receiving water. The primary receiving waters for runoff from the Project area are identified in Table 4.10-1. As shown, Canyon Lake is impaired for nutrients and pathogens, and Lake Elsinore is impaired for polychlorinated biphenyls (PCBs), organic compounds, nutrients, organic enrichment, sediment toxicity, and unknown toxicity.

The MS4 Permit requirements for new development calls for compliance with water quality regulatory requirements applicable to storm water runoff. The effectiveness of storm water quality controls is primarily based on two factors: (1) the amount of runoff that is captured by the controls; (2) the selection

of BMPs to address identified pollutants of concern. Selection and numerical sizing criteria for new development treatment controls are included in the MS4 Permit.

As previously noted, a WQMP is required to reduce or eliminate water pollution caused by runoff that flows from storm water drainage systems into receiving waters. Project-specific Preliminary WQMPs for the Rider 2 Building and Rider 4 Building have been prepared for the Project (included in Appendix J of this EIR) to identify appropriate BMPs for the Project. A Final Project-specific WQMP that is in substantial conformance with the approved Preliminary Project-Specific WQMP shall be approved by the City prior to the issuance of grading permits (refer to regulatory requirement RR 10-4).

As identified in the Preliminary WQMPs prepared for the Project, low-impact development (LID) BMPs (e.g., bioretention and biotreatment) are proposed to detain storm water on site for runoff mitigation. In compliance with the Standards and Guidelines identified previously (Section 4.2.2.7 and 8.2.1 of the PVCCSP), and described in Section 3.6.5, Utilities and Infrastructure, of this EIR, the Preliminary WQMP identifies site-design BMPs, structural and non-structural source-control BMPs, and treatment-control BMPs that would be implemented for the Project.

The Rider 2 WQMP indicates that storm water flows generated by the development of the Rider 2 site would be collected and conveyed to a proposed bio-retention basin in the southeast portion of the site. The Rider 4 WQMP indicates that storm water flows from the Rider 4 site would be conveyed into the modular wetlands system (MWS) located on the southeast corner of the site. Refer to Figure 3-21 and Figure 3-22 in Section 3.0, Project Description, of this EIR, which depict the post-construction BMP site maps. The bio-retention basin and MWS would remove pollutants from runoff, thereby providing first-flush capture, detention, and filtration of storm water runoff before it is discharged from the site. On-site runoff would continue to flow the PVSD Channel, consistent with existing conditions.

Source-control BMPs would also be incorporated into the Project to reduce the amount of pollutants released into the environment. Source-control BMPs are permanent, structural features that would be included in Project plans and operational BMPs that would be implemented by the site’s occupant or user. Table 4.10-3 lists permanent and operational source-control BMPs that have been incorporated into the Project, as identified in the Preliminary WQMPs.

Table 4.10-3 Permanent and Operational Source Control BMPs

Potential Sources of Runoff Pollutants	Permanent Structural Source Control BMPs	Operational Source Control BMPs
On-site storm drain catch basins and grated inlets.	On-site storm drain signage will utilize language, “No Dumping Drains to River,” or equally approved text that is consistent with the City of Perris’ requirements. Landscape area drains surrounded by vegetation will not be signed. Catch Basin Markers may be available from the Riverside County Flood Control and Water District Conservation District.	Maintain and periodically repaint or replace inlet markings. Provide storm water pollution prevention information to new site owners, lessees, or operators. Include the following in lessee agreements: <i>“Tenants shall not allow anyone to discharge anything to storm drains or to store or deposit materials so as to create a</i>

Potential Sources of Runoff Pollutants	Permanent Structural Source Control BMPs	Operational Source Control BMPs
	<p>On-site drainage structures, including all storm drain clean outs, area drains, inlets, catch basins, inlet & outlet structures, forebays, & water treatment control basins shall be inspected and maintained on a regular basis to insure their operational adequacy.</p>	<p><i>potential discharge to storm drains.</i></p> <p>Maintenance should include removal of trash, debris, & sediment and the repair of any deficiencies or damage that may impact water quality.</p> <p>See applicable operational BMPs in Fact Sheet SC-44, "Drainage System Maintenance," in Appendix 10 (California Stormwater Quality Association [CASQA] Stormwater Quality Handbook at www.cabmphandbooks.com</p>
<p>Interior floor drains and elevator shaft sump</p>	<p>The interior floor drains and elevator shaft sump pumps will be plumbed to sanitary sewer.</p>	<p>Inspect and maintain drains to prevent blockages and overflow.</p>
<p>Landscape/Outdoor Pesticide Use</p>	<p>The final landscape shall be designed to accomplish all of the following:</p> <p>Preserve existing native trees, shrubs, and ground cover to the maximum extent possible.</p> <p>Design landscape to minimize irrigation and runoff, to promote surface infiltration where appropriate and to minimize the use of fertilizers and pesticides that can contribute to storm water pollution.</p> <p>Where landscaped areas are used to retain or detain storm water, specify plants that are tolerant of saturated soil conditions.</p> <p>Consider using pest-resistant plants, especially adjacent to hardscape.</p> <p>To ensure successful establishments, select plants appropriate to site, soils, slopes, climate, sun, wind, rain, land use, air movement, ecological consistency, and plant interactions.</p>	<p>Maintain landscaping using minimum or no pesticides</p> <p>Provide Integrated Pest Management (IPM) information to new owners, lessees, and operators.</p> <p>Landscape maintenance should include mowing, weeding, trimming, removal of trash & debris, repair of erosion, revegetation, and removal of cut & dead vegetation.</p> <p>Irrigation maintenance should include the repair of leaky or broken sprinkler heads, the maintaining of timing apparatus accuracy, and the maintaining of shut off valves in good working order.</p> <p>See applicable operational BMPs in "What you should know for.... Landscape and Gardening" at http://rcflood.org/storm water and Appendix 10.</p>

Potential Sources of Runoff Pollutants	Permanent Structural Source Control BMPs	Operational Source Control BMPs
	<p>Pesticide usage should be at a necessary minimum and be consistent with the instructions contained on product labels and with the regulations administered by the State Department of Pesticide Regulation.</p> <p>Pesticides should be used at an absolute minimum or not at all in the retention/infiltration basin. If used, it should not be applied in proximity to the rainy season.</p>	
<p>Refuse Trash Storage Areas</p>	<p>Trash container storage areas shall be paved with an impervious surface, designed not to allow run-on from adjoining areas, designed to divert drainage from adjoining roofs and pavements from the surrounding area, and screened or walled to prevent off-site transport of trash.</p> <p>Trash dumpsters (containers) shall be leak proof and have attached covers or lids.</p> <p>Trash enclosures shall be roofed per City standards and the details on the PWQMP Exhibit in Appendix 1 of the PWQMP.</p> <p>Trash compactors shall be roofed and set on a concrete pad per City standards. The pad shall be a minimum of 1 foot larger all around than the trash compactor and sloped to drain to a sanitary sewer line. Connection of trash area drains to the MS4 is prohibited.</p> <p>See CASQA SD-32 BMP Fact Sheets in Appendix 10 of the PWQMP for additional information.</p> <p>Signs shall be posted on or near dumpsters with the words "Do not dump hazardous materials here" or similar.</p>	<p>An adequate number of receptacles shall be provided. Inspect receptacles regularly; repair or replace leaky receptacles. Keep receptacles covered. Prohibit/prevent dumping of liquid or hazardous wastes. Post "no hazardous materials" signs. Inspect and pick up litter daily and clean up spills immediately. Keep spill control materials available onsite.</p> <p>See Fact Sheet SC-34, in Appendix 10 of the PWQMP, "Waste Handling and Disposal" in the CASQA Stormwater Quality Handbook at www.cabmphandbooks.com</p>
<p>Loading Docks</p>	<p>Loading docks will not be covered and are 4 feet above finished pavement surface.</p>	<p>Move loaded and unloaded items indoors as soon as possible.</p>

Potential Sources of Runoff Pollutants	Permanent Structural Source Control BMPs	Operational Source Control BMPs
	<p>Spill kits are to be kept on site at all times per SC-11.</p>	<p>Inspect for accumulated trash and debris. Implement good housekeeping procedures on a regular basis. Sweep areas clean instead of using wash water. Loading docks will be kept in a clean and orderly condition, through a regular program of sweeping and litter control, and immediate clean-up of any spills or broken containers. Property owner will ensure that loading docks will be swept as needed. Clean-up procedures will not include the use of wash-down water. Property owner will be responsible for implementation of loading dock housekeeping procedures.</p> <p>See the Fact Sheet SC-30, in Appendix 10 of the PWQMP, "Outdoor Loading and Unloading" in the CASQA Stormwater Quality Handbooks at www.cabmphandbooks.com</p>
<p>Fire Sprinkler Test Water</p>	<p>Provide a means to drain fire sprinkler test water to the sanitary sewer.</p>	<p>See the note in the Fact Sheet SC-41, in Appendix 10 of the PWQMP, "Building and Grounds Maintenance," of the CASQA Stormwater Quality Handbooks at www.cabmphandbooks.com.</p>
<p>Miscellaneous Drain or Wash Water or Other Sources</p> <p>Boiler drain lines</p> <p>Condensate drain lines</p> <p>Rooftop equipment Drainage sumps</p> <p>Roofing, gutters, and trim</p>	<p>Boiler drain lines shall be directly or indirectly connected to the sanitary sewer system and may not discharge to the storm drain system.</p> <p>Condensate drain lines may discharge to landscaped areas if the flow is small enough that runoff will not occur.</p> <p>Condensate drain lines may not discharge to the storm drain system.</p> <p>Rooftop equipment with potential to produce pollutants shall be roofed and/or have secondary containment.</p> <p>Any drainage sumps on site shall feature a sediment sump to reduce</p>	

Potential Sources of Runoff Pollutants	Permanent Structural Source Control BMPs	Operational Source Control BMPs
	the quantity of sediment in pumped water. Avoid roofing, gutters and trim made of copper or other unprotected metals that may leach into runoff.	
Other sources	Include controls for other sources as specified by local reviewer.	
Plazas, sidewalks, and parking lots	Spill kits are to be kept on site at all times per SC-11.	Sweep plazas, sidewalks, and parking lots regularly to prevent accumulation of litter and debris. Collect debris from pressure washing to prevent entry into the storm drain system. Collect wash water containing any cleaning agent or degreaser and discharge to the sanitary sewer not to a storm drain.
Source: (Webb, 2019a) (Webb, 2019c)		

The proposed on-site storm drain system would convey all runoff to the proposed water quality treatment facilities, which would remove potential pollutants within the runoff and filter the water to meet the water quality standards of the Santa Ana RWQCB. Based on the Project’s WQMPs, the water quality volume for the 85th percentile, 24-hour storm event at the Rider 2 and Rider 4 sites would be treated through detention and filtration by the proposed detention basin (refer to Appendix 6 of the respective WQMPs).

By complying with the NPDES permit and WQMP requirements (refer to RR 10-4) and by incorporating Standards and Guidelines from the PVCCSP related to water quality, the Project would not provide substantial additional sources of polluted runoff to receiving waters. Long-term water quality impacts would be less than significant.

Groundwater Quality

The Project area is located within the EMWD’s Perris North groundwater subbasin. During soil sampling conducted for the Project, groundwater was encountered at a depth of approximately 33 feet at the Rider 2 site, and 34 feet at the Rider 4 site. Several monitoring wells are located within a mile radius of the Project area with high groundwater level readings ranging from 26 to 108± feet from the ground surface. Based on data from a monitoring well located approximately 0.9 mile from the Rider 2 site and 0.75 mile from the Rider 4 site, a high groundwater depth of approximately 26 feet was reported and is considered to be conservative with respect to recent site conditions (SCG, 2019a; SCG, 2019b).

Excavation activities associated with the Project are not anticipated to reach a depth of 26 feet; thus, construction activities, including grading, are not anticipated to encounter significant amounts of groundwater. Nonetheless, since the Project would comply with regulatory requirements (see regulatory

requirements RR 10-1 to RR 10-3), including the Construction General Permit, surface water that may percolate into the soil would not adversely affect groundwater on or off site.

Through compliance with the NPDES permits, implementation of WQMP requirements (see regulatory requirement RR 10-4), and incorporating PVCCSP Standards and Guidelines related to water quality, the Project would result in less than significant impacts related to long-term water quality.

Additional Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

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

The PVCCSP EIR concludes that implementation of the PVCCSP and implementation of BMPs by implementing projects would not result in adverse effects to groundwater supplies or interfere with groundwater recharge. Impacts related to groundwater would be less than significant.

Potable water service is provided to the City of Perris by the EMWD. The EMWD has four sources of water supply: imported water purchased from the Metropolitan Water District (MWD), local potable groundwater, local desalinated groundwater, and recycled water. According to the Project-specific Water Supply Assessment (WSA) prepared by EMWD and included in Appendix M of this EIR (EMWD, 2019a), groundwater is not being proposed to serve the Project, as EMWD considers current groundwater production to be utilized exclusively by existing customers. Therefore, groundwater would not be used to serve the Project and the Project would not have the potential to substantially decrease groundwater supplies.

Natural recharge to the San Jacinto groundwater basin is primarily from percolation of flows in the San Jacinto River and its tributary streams, with percolation of water stored in Lake Perris as an additional source of recharge. The Project area is not located within a recharge area. Implementation of the Project would reduce the pervious areas available for potential natural recharge due to construction of the industrial buildings, parking, areas, roadway improvements, and other improvements. The Rider 2 and Rider 4 sites collectively are relatively small (approximately 65 net acres) in relation to the total size of the groundwater subbasin and the Project area's only source of water is from precipitation, providing little opportunity to recharge under existing conditions.

Based on the foregoing analysis, the Project is not anticipated to substantially decrease groundwater supplies or interfere substantially with groundwater recharge and impacts would be less than significant.

Additional Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

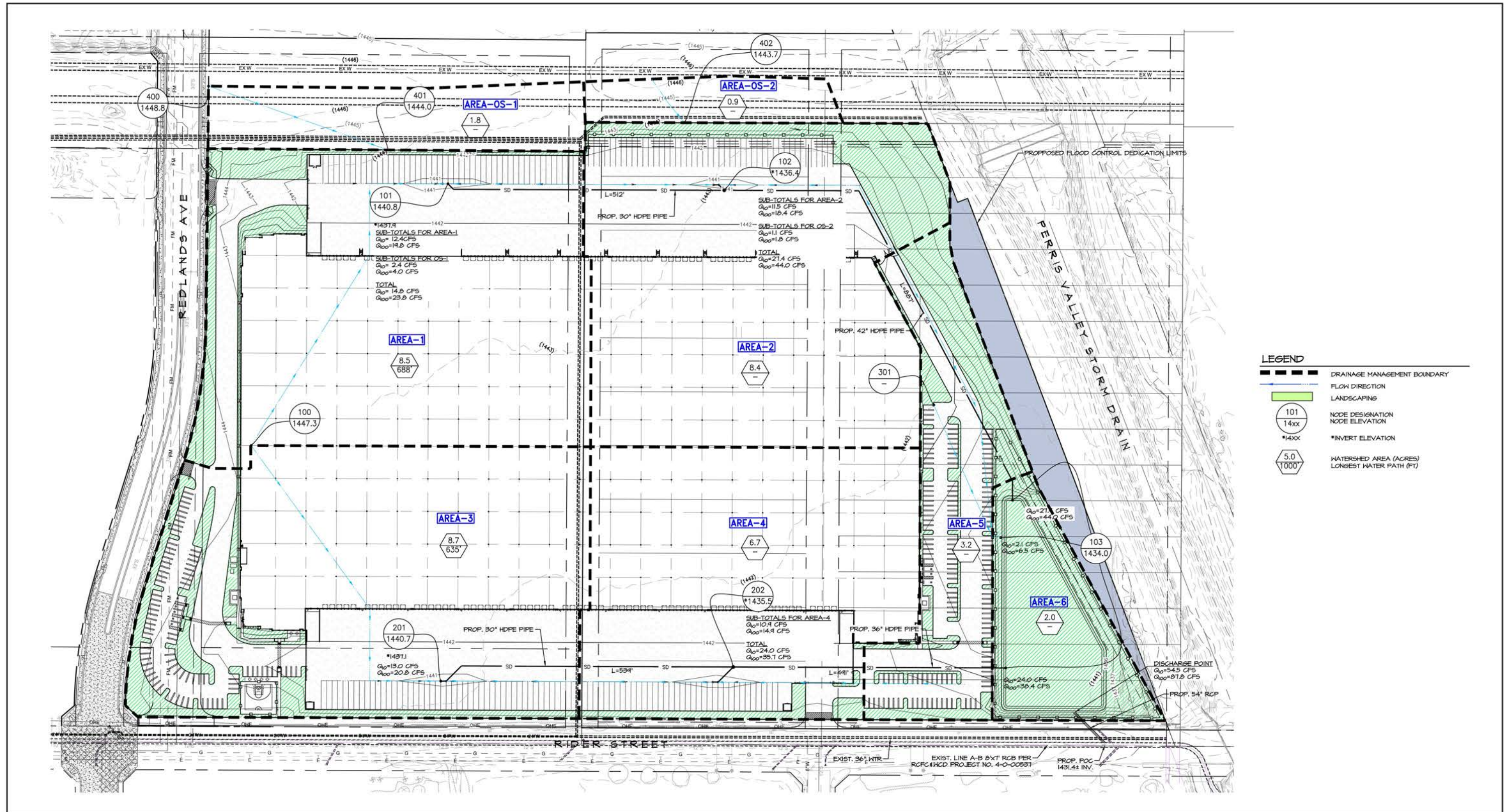
Threshold c Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:

- i. Result in substantial erosion or siltation on or off site;**
- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;**
- iii. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or**
- iv. Impede or redirect flood flows?**

The PVCCSP EIR concludes that development of planned uses under the PVCCSP would result in increased storm water flows in the PVCCSP area. However, with implementation of site-specific WQMPs and the construction of on- and off-site storm drain facilities, impacts to the natural drainage pattern would not result in on- or off-site flooding, substantial erosion or siltation, exceed the capacity of existing or proposed storm water drainage systems, and would not impede or redirect flood flows.

Preliminary Hydrology Studies for the Rider 2 and Rider 4 buildings (included in Appendix J of this EIR) have been prepared to evaluate runoff flows associated with the 100-year and 10-year frequency storm from the building sites using the Rational Method and the Unit Hydrograph Method, in accordance with the RCFC&WCD Hydrology Manual. These calculations were used to determine the required storm drain facilities, alignment, and sizes required to protect the sites, and to determine the necessary basin area and volume required for water quality treatment.

“First flush” storm water flows originating from Rider 2 site in the proposed developed condition would be captured by inlets located on the northern and southern boundaries of the proposed Rider 2 Building. The proposed inlets are anticipated to adequately capture and convey 100-year flows. As shown on Figure 4.10-2, On-Site Rational Method Hydrology Map – Rider 2 Site, flows captured on the northern side of the Rider 2 Building would be conveyed by a 30-inch high density polyethylene (HDPE) storm drain, that transitions into a 42-inch HDPE storm drain, to the proposed basin located east of the Rider 2 Building. Flows captured on the southern side of the Rider 2 Building would be conveyed by a 30-inch HDPE, that transitions to a 36-inch HDPE, to the proposed basin east of the Rider 2 Building.



Source(s): Webb Associates (08-26-2019)

Figure 4.10-2



On-Site Rational Method Hydrology Map – Rider 2 Site

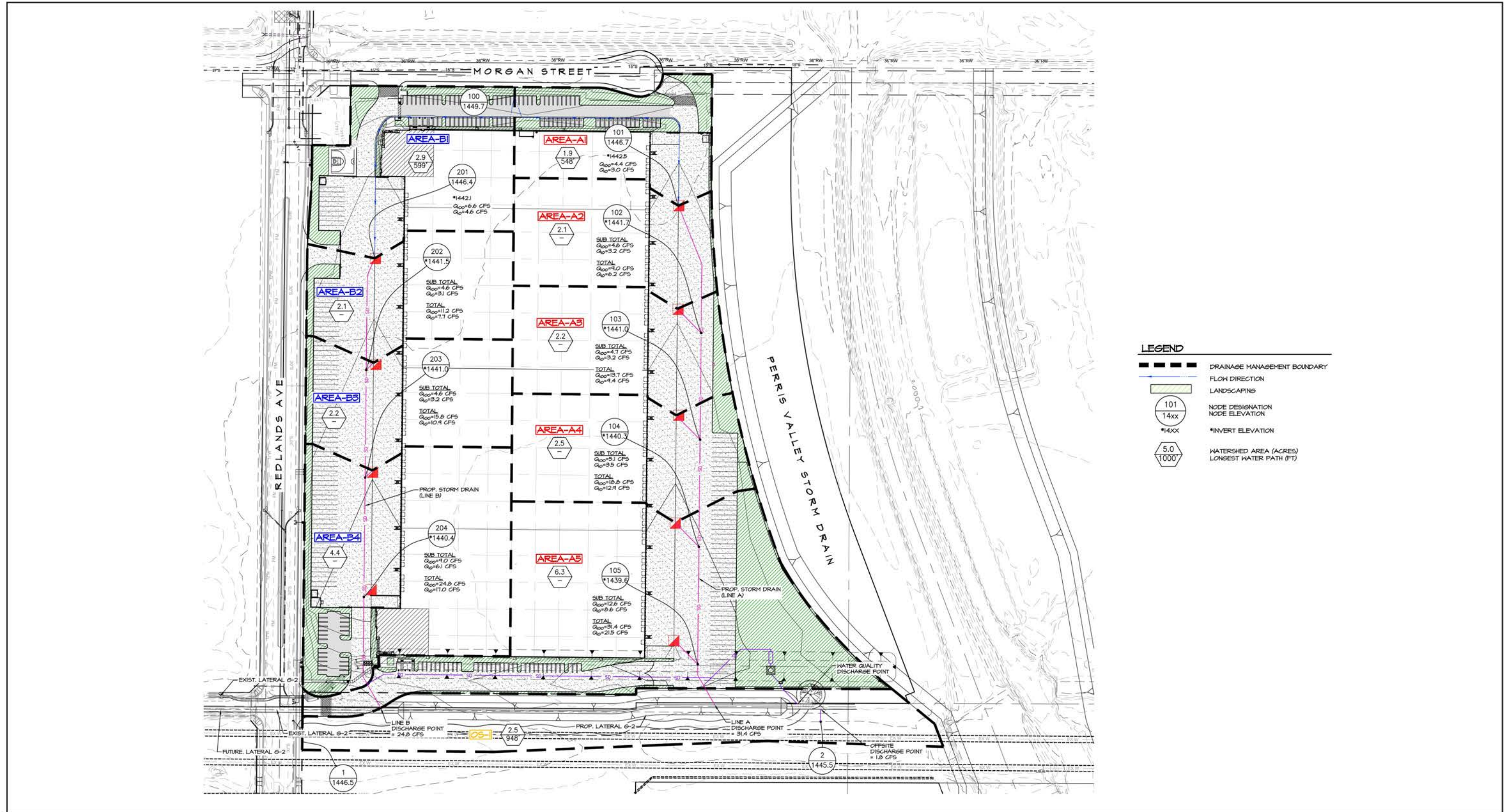
Runoff captured in the proposed basin would discharge from the Outlet Structure A, which is located at the southeast corner of the proposed basin and has a 100-year flow rate of 87.8 cfs, and into the existing 24-inch Lateral A-B-2 reinforced concrete pipe (RCP) that connects to an existing 8-foot by 7-foot reinforced concrete box (RCB) storm drain, Line A-B, which ultimately drains to the PVSD Channel, which would be improved with the Project. Because the Project proposes to discharge on-site runoff only at the existing Lateral A-B-2, the lateral would be redesigned and upsized to 54-inches to accommodate the Project's 87.8 cfs flow rate.

Storm water flows originating from the Rider 4 site would be captured by storm inlets located on the eastern and western boundaries of the Rider 4 Building. The inlets on grade were designed with a worst-case tributary flow of 6.6 cubic feet per second (cfs) and have a capture efficiency of 93 percent. The inlets in sag were designed with a worst-case tributary flow of 13.5 cfs, which accounts for the worst-case tributary flow plus 10 percent. The inlets in sag create a ponding depth of 0.36 feet, which is determined to be within normal parameters. As shown in Figure 4.10-3, On-Site and Off-Site Rational Method Hydrology Map – Rider 4 Site, flows captured on the eastern side of the Rider 4 Building would be conveyed by proposed Line A and flows captured on the western side of the Rider 4 Building would be conveyed by proposed Line B. Both Line A and B connect to a low flow manhole, which allow treatment flow to be captured and conveyed to the proposed detention basin before being pumped into an on-site vault. From the on-site vault, runoff is gravity fed into Lateral G-2, a PVMDP facility that would be constructed as part of the Project, that proposes a peak flow rate of 301 cfs and ultimately drains into the PVSD Channel to the east.

The Rider 4 site also received a small amount of off-site storm water flows that come from an existing ridgeline located on the south side of the Project boundary in Metropolitan Water District (MWD) right-of-way. These off-site flows would impact the area designated for the proposed multi-purpose trail. The area would be landscaped and depressed to conform to water quality standards Refer to site Section E-E in Figure 3-27 presented in Section 3.0, Project Description, of this EIR. Runoff generated from this area would also be conveyed into proposed Lateral G-2. Redlands Avenue protects the site from any runoff from the west. On the north side of the site, there is a swale that prevents flows from running on site. To the east, the PVSD Channel conveys runoff away from the site.

Implementation of the Rider 2 and Rider 4 buildings and associated site improvements would increase the impervious area of the sites and would increase the amount and rate of runoff. However, on-site flows would ultimately be discharged to the PVSD Channel, consistent with existing conditions. The proposed storm drain improvements, including PVSD Channel improvements, as identified above and described in Section 3.0 of this EIR, would provide adequate capacity to handle the storm water runoff from the Project area and would not exceed the capacity of existing or planned storm water drainage systems. Additionally, as described above, because the Project would implement short- and long-term water quality controls (i.e., BMPs) consistent with applicable regulatory requirements, the Project would not result in substantial erosion or siltation on or off site during both construction and operation or provide substantial additional sources of polluted runoff. Implementation of the Project would result in less than significant impacts.

It should be noted that the PVSD Channel improvements being implemented as part of the Project include construction of planned PVCMDP improvements. These improvements have been designed to



Source(s): Webb Associates (08-26-2019)

Figure 4.10-3



On-Site and Off-Site Rational Method Hydrology Map – Rider 4 Site

accommodate 100-year storm flows (refer to the description of improvements included in Section 3.6.7, of this EIR). As required, a hydrology study for PVSD Channel improvements will be submitted along with construction drawings to RCFC&WCD for review. Therefore, the Project would not impede or redirect flood flows. This issue is further addressed under Threshold d, below.

Additional Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

Threshold d Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The PVCCSP EIR concludes that implementing projects within the PVCCSP area that occur within the floodplain would be in compliance with Title 15 “Floodplain Regulations,” of the City’s Municipal Code, which regulates, restricts, or prohibits development in flood hazard areas. With adherence to applicable requirements, development proposed by the PVCC would not be exposed to significant risk from flooding.

Under existing conditions, most of the Project area is located within FEMA Flood Hazard Zone AE, which indicates that an area is subject to inundation by the 1-percent annual chance flood event (100-year flood event). As described in Section 3.6.7, PVSD Channel Improvement, of this EIR, the Project includes implementation of planned PVCMDP improvements to the PVSD Channel to accommodate 100-year storm flows. The PVSD Channel improvements to be implemented as part of the Project are adjacent to the eastern boundaries of the Rider 2 and Rider 4 sites; the improvements begin approximately 100 feet north of Morgan Street and extend to just south of Rider Street. The PVSD Channel in this area would transition to a 550-foot-wide channel. Downstream of the CRA, the PVSD Channel would be deepened and would transition with an engineered drop structure at the MWD easement to a 440-foot-wide channel with a 56-foot-wide by 5-foot-deep low flow channel. In this area, the proposed PVSD Channel right-of-way would be 495 feet wide. The PVSD Channel would be earthen except in the vicinity of the engineered drop structure and Rider Street bridge, where it would have concrete side slopes. Erosion protection features would be installed, and existing storm drain inlets that tie into the PVSD Channel would be reconstructed as part of the Project. The Rider Street bridge would also be expanded as part of the PVSD Channel improvements. Refer to site Section A-A and Section F-F in Figure 3-27 presented in Section 3.0, Project Description, of this EIR, which depict typical sections across the PVSD Channel, and Figure 3-23, which depicts the conceptual plan and elevations for the bridge.

Once widened, dirt from the PVSD Channel improvements would be used as fill to elevate the Rider 2 and Rider 4 sites above the 100-year floodplain. Therefore, improvements to the PVSD Channel and increased elevation would protect the buildings sites during a 100-year storm event and ensure that the Project does not have the potential to result in flooding on- or offsite nor impede or redirect flood flows. Figure 4.10-1, Existing and Proposed Floodplain Delineation, depicts the 100-year flood plain within the PVSD Channel with implementation of the proposed improvement. However, because the Rider 2 and Rider 4 building sites are currently located in a designated flood hazard area, a CLOMR and LOMR from

FEMA are required. If FEMA determines that the Project is consistent with the original CLOMR approval and meets the minimum floodplain management criteria of the National Flood Insurance Program (NFIP), then a LOMR would be issued and FEMA's FIRM would be officially revised to remove the affected area of the sites from the floodplain. Mitigation measures MM 10-1 and 10-2 ensure that the LOMR and CLOMR are obtained and the Rider 2 and Rider 4 sites are removed from the flood hazard area. Therefore, implementation of the Project would result in less than significant impacts related to the release of pollutants due to Project inundation.

A tsunami is a very large ocean wave caused by an underwater earthquake or volcanic eruption. The Project area is located approximately 40 miles northeast 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 due to seismic disturbances. The Project area is located approximately 1.6 miles southwest of the Perris Reservoir and, as such, a seiche from this water body would not impact the Project area.

As identified in Section 4.7, Hydrology and Water Quality, of the PVCCSP EIR, and shown in Exhibit S-15 (Dam Inundation Map) of the City's General Plan Safety Element, the Project area is located in an identified dam inundation area. Specifically, the Project area is within the potential dam inundation plain of Lake Perris to the immediate northeast of the City. In July 2005, the California Department of Water Resources (DWR) identified potential seismic safety problems with Perris Dam that could result in significant damage and uncontrolled water releases in the event of a major earthquake. DWR is currently upgrading the seismic safety of Perris Dam; construction to strengthen the foundation began in October 2014 and was completed in April 2018, with additional improvements to the outlet tower and emergency release facility still to be completed (DWR, 2020b). The lake level was lowered to ensure maximum public safety until the dam repairs are complete. Although the Project area is within the dam inundation zone, occurrence of flooding from the Lake Perris reservoir in the City is extremely remote, as Perris Dam has been engineered and constructed and is being retrofitted with the knowledge that the area is seismically active. Due to the unlikely possibility of dam failure, potential for flooding resulting from the failure of a dam is low. Therefore, dam inundation impact associated with the construction and operation of the Project is less than significant, and no mitigation would be required.

Additional Project-Level Mitigation Measures

MM 10-1 Prior to the issuance of a grading permit for structures located within the 100-year floodplain (as shown on the applicable FEMA Flood Insurance Rate Map [FIRM]), the Project Applicant shall provide evidence to the City of Perris that a Conditional Letter of Map Revision (CLOMR) has been issued by FEMA for the Project.

MM 10-2 Prior to the inspection for occupancy for structures located within the 100-year floodplain (as shown on the applicable FEMA FIRM), the Project Applicant shall provide evidence to the City of Perris that a Final Letter of Map Revision (LOMR) has been issued by FEMA verifying that flood control measures have been completed and the proposed structures are permanently removed from the FEMA 100-year floodplain. The pad elevation shall be a minimum one-foot above the 100-year flood plain elevation as identified on the applicable FEMA FIRM.

Level of Significance After Mitigation

Project impacts would be less than significant with mitigation. This is consistent with the conclusions of the PVCCSP EIR.

Threshold e Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

At the time the PVCCSP EIR was drafted, the topic of water quality control plans and sustainable groundwater management plans were not included in Appendix G of the State CEQA Guidelines. Therefore, neither the PVCCSP Initial Study nor the PVCCSP analyze the PVCCSP's impacts related to conflicts with a water quality control plan and sustainable groundwater management plan. However, the PVCCSP Initial Study concludes that future development within the PVCCSP area would be required to comply with all existing regulations including implementation of a WQMP to address potential pollutants generated from project operations and coverage under the State's General Permit for Construction Activities to address potential pollutants generated during construction. Impacts to water quality would be less than significant. The PVCCSP EIR concludes that the implementation of the PVCCSP and implementing projects would not have a substantial effect on groundwater recharge within the Perris North Groundwater Management Zone of the West San Jacinto Groundwater Sub-basin.

As discussed in Threshold 10a above, the Project area is located within the Santa Ana River Basin and Project-related construction and operational activities would be required to comply with the Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Plan by preparing and adhering to a SWPPP and WQMP and by installing and maintaining BMPs. Implementation of the Project would not conflict with or obstruct the Santa Ana River Basin Water Quality Control Plan and no impact would occur.

Under the Sustainable Groundwater Management Act (SGMA) passed in 2014 (*California Water Code* Section 10729[d]), each high and medium priority basin, as identified by the California Department of Water Resources (DWR), is required to have a Groundwater Sustainability Agency (GSA) that will be responsible for groundwater management and development of a Groundwater Sustainability Plan (GSP) (DWR, 2020a). The San Jacinto Groundwater Basin is a high priority basin (DWR, 2019). The EMWD Board of Directors is the GSA for the West San Jacinto Groundwater Sub-basin and is responsible for development and implementation of a GSP. The EMWD Board of Directors is required to develop a GSP by 2022 and implement the GSP by 2042. The GSP will document the basin conditions and basin management will be based on measurable objectives and minimum thresholds defined to prevent significant and unreasonable impacts to the sustainability indicators defined in the GSP. At the time this EIR was prepared, a GSP for the West San Jacinto Groundwater Sub-basin was not adopted (EMWD, 2019c). EMWD anticipates that a complete draft GSP will be available on or before December 2020 (EMWD, 2019b). Although the GSP has not been adopted, the Project would not conflict with the plan because groundwater would not be used to serve the Project; the Project would be supplied with imported, purchased water for potable water demands and recycled water for non-potable water demands (see the Project-specific WSA included in Appendix M of this EIR), and the Project area is not within a groundwater recharge area. Therefore, the Project does not have the potential to conflict or obstruct implementation of a sustainable groundwater management plan and no impacts would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

No impacts would occur.

4.10.5 CUMULATIVE IMPACTS

Consistent with the PVCCSP EIR, the geographic context for the Hydrology and Water Quality cumulative impact analysis is the Perris Valley/San Jacinto Watershed Hydrologic Unit and the EMWD service area. Cumulative development in the watershed would result in an increase in impervious surfaces in addition to changes in land use and associated pollutant runoff. Increased impervious surface areas are likely to alter hydrology and increase potential pollutant loads. However, all development and future development in the City and throughout the watershed must obtain coverage under and comply with requirements of the NPDES permit program. Although continued growth is anticipated to occur in the City of Perris and surrounding areas, new development and significant redevelopment would have to minimize their individual impacts to water quality and pollutant transport through implementation of construction and post-construction BMPs. As noted in the PVCCSP EIR, development throughout the PVCCSP area and the City would be regulated through the County's WQMP requirements and the NPDES permit requirements. Because these requirements would be imposed on all developments, it is anticipated that each development would be required to mitigate its own specific impact on water quality and drainage. Consistent with the conclusions of the PVCCSP EIR, no significant cumulative impacts related to water quality would occur.

The Project is consistent with the EMWD's Urban Water Management Plan, and there are no components of the Project that would conflict, on a direct or cumulative basis, with the EMWD's Groundwater Management Plan policies. Additionally, although development of the Project would increase impervious surface coverage on the property, the Project would not directly interfere with groundwater recharge because almost all the Project related runoff would discharge in to the PVSD Channel, as occurs under existing conditions. Additionally, the Project would either mimic or reduce the 100-year peak flow on site and the total amount of water leaving the site under developed conditions would be virtually the same as occurs under existing conditions. Furthermore, the Project's required long-term operational WQMP would ensure that runoff from the Project area does not contain substantial pollutants that could impair surface or groundwater quality. Other developments within the cumulative study area would also be required to implement operational WQMPs, and would be required to demonstrate that overall runoff does not substantially change in terms of peak volumes or total volumes of runoff. Therefore, the Project would result in a less than cumulatively considerable impact to groundwater supply, recharge, and quality.

Storm water flow conveyance and flood potential would increase as development results in greater amounts of impervious surfaces and channelization for conveyance of peak flows. However, the RCFC&WCD, the PVMDP, and PVCMDP guide and govern local and regional hydrology and hydraulic modifications. The capacities of planned drainage facilities have been determined assuming a full buildout scenario. The Project would mitigate the increased runoff for the 100-year flow caused by the Project as required by the City with an on-site storm drain system. All development in the County of Riverside and the San Jacinto Watershed (including the City of Perris) must comply with the requirements of the applicable NPDES permit, the RCFC&WCD DAMP, the PVMDP and ADP, and other pertinent local drainage and conveyance ordinances. Existing regulations effectively minimize potential impacts to flow conveyance and flooding. As identified previously, the Project includes site-design BMPs, and the on-site drainage system would be designed so that runoff from the Project area is directed to on-site

treatment-control BMPs and flow volumes exiting the site are within less than or equal to pre-development conditions. Further, the Project implements the planned regional improvements to the PVSD Channel along the eastern portion of the Project area. Accordingly, the Project-related contribution to impacts associated with storm water flow conveyance would not be cumulatively considerable, and thus less than significant.

Future development within the City of Perris and the PVCCSP area, including the Project area, could place structures within the 100-year flood hazard area that could impede or redirect flood flows. The Project and other development projects within a floodplain are required to obtain a CLOMR and LOMR from FEMA that would remove the sites from the 100-year flood hazard area. Development of projects within the PVCCSP area and the Perris Valley that occurs within the floodplain is restricted by the City of Perris to ensure that flood flow is not redirected or impeded to the detriment of properties within the City of Perris or properties upstream or downstream. The PVCCSP EIR finds that less than significant impacts would occur relative to the risk to property and life resulting from construction within the 100-year floodplain within the City, which is consistent with City of Perris General Plan EIR. As such, no significant cumulative impacts from the Project relating to flooding would result.

As discussed above under Threshold e, the Project does not have the potential to conflict with any water quality control plans or sustainable groundwater management plans on a direct basis. As such, the Project would not conflict with such plans on a cumulative basis; no significant cumulative impacts from the Project related to conflicts with water quality control plans or sustainable groundwater management plans would result.

4.10.6 REFERENCES

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4.11 LAND USE AND PLANNING

This section describes the Project area and existing land uses in the surrounding area, and evaluates the Project's consistency with the City of Perris General Plan (including goals and policies), zoning, and the *Perris Valley Commerce Center Specific Plan* (PVCCSP). Information presented in this section is based on a review of relevant planning programs, information presented in the PVCCSP EIR, and site reconnaissance. References used in this section are listed below under Subsection 4.11.6, References.

A Notice of Preparation (NOP) comment letter was received from the Southern California Association of Governments (SCAG) requesting that the consistency of the Project with the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals be addressed. SCAG identifies that RTP/SCS strategies provide guidance for considering the project in the context of these goals and recommends that the 2016 RTP/SCS Final Program EIR mitigation measures be used for guidance, as appropriate.

The Riverside County Airport Land Use Commission (ALUC) also submitted a comment on the NOP noting that the Project does not require ALUC review as the City's General Plan has been found consistent with the March Air Reserve Base/Inland Port (MARB/IP) Airport Land Use Compatibility Plan (ALUCP), and the Project does not require any legislative actions. City staff can perform the airport compatibility review; a detailed assessment of the Project consistency with the MARB/IP ALUCP is provided in Section 4.9, Hazards and Hazardous Materials, of this EIR.

4.11.1 EXISTING SETTING

Project Area

The approximately 94.7-acre Project area consists of the 38.3-net acre Rider 2 site, 26.7-net acre Rider 4 site, and 29.7-acre PVSD Channel improvement area, and is located in the City of Perris in Riverside County. The Project area is bordered by Morgan Street to the north, Rider Street to the south, and Redlands Avenue to the west. The existing PVSD Channel extends along the eastern portion of the Project area, and also forms a portion of the eastern boundary of the PVCCSP area. Additionally, the site-adjacent off-site improvement areas encompass approximately 4.5-acres and consist of: (1) area that would be dedicated for roadways improvements along Rider Street and Morgan Street; (2) the 0.2-acre EMWD parcel southeast of the Redlands Avenue/Morgan Street intersection that ultimately would be included as part of the Project area and used for Redlands Avenue streetscape improvements; (3) area that would be dedicated for the PVSD Channel improvements; and, (4) the area south of the Rider 4 site and north of the Metropolitan Water District (MWD) property where the proposed linear trail would be constructed, backbone storm drain infrastructure would be installed, and Sinclair Street would be improved to provide access to the Rider 4 site.

The Project area is approximately 1.6 miles east of Interstate 215 (I-215), 0.5 mile south of Ramona Expressway, and approximately 7 miles south of State Route (SR)-60. The Project area is located approximately 2.6 miles southeast of the MARB/IP Airport. Figure 3-1, *Regional and Local Vicinity Map*, in Section 3.0, Project Description, of this EIR, depicts the regional location and local vicinity of the Project area.

As shown in the aerial photograph provided in Figure 3-2, the Project area is vacant and undeveloped, except for the eastern portion of the Project area that includes the PVSD Channel. Temporary construction trailers for development of previously approved buildings in the Rider Business Center (Rider 1 and Rider 3) have been placed in the southwest portion of the Rider 2 site, adjacent to Rider Street. The Colorado River Aqueduct (CRA) is located within MWD property that extends in an east-west direction between the Rider 2 and Rider 4 sites and connects to the PVSD Channel within the Project area.

The Rider 2 and Rider 4 sites can generally be characterized as disced and disturbed vacant land that was historically utilized for agricultural purposes. The PVSD Channel is an engineered flood control channel constructed in 1955 that is mowed and maintained on an annual basis by the Riverside County Flood Control and Water Conservation District (RCFC&WCD). The Rider 2 and Rider 4 sites are within the existing 100-year flood plain for the PVSD Channel. There is an existing bikeway/trail that extends along the eastern side of the PVSD Channel.

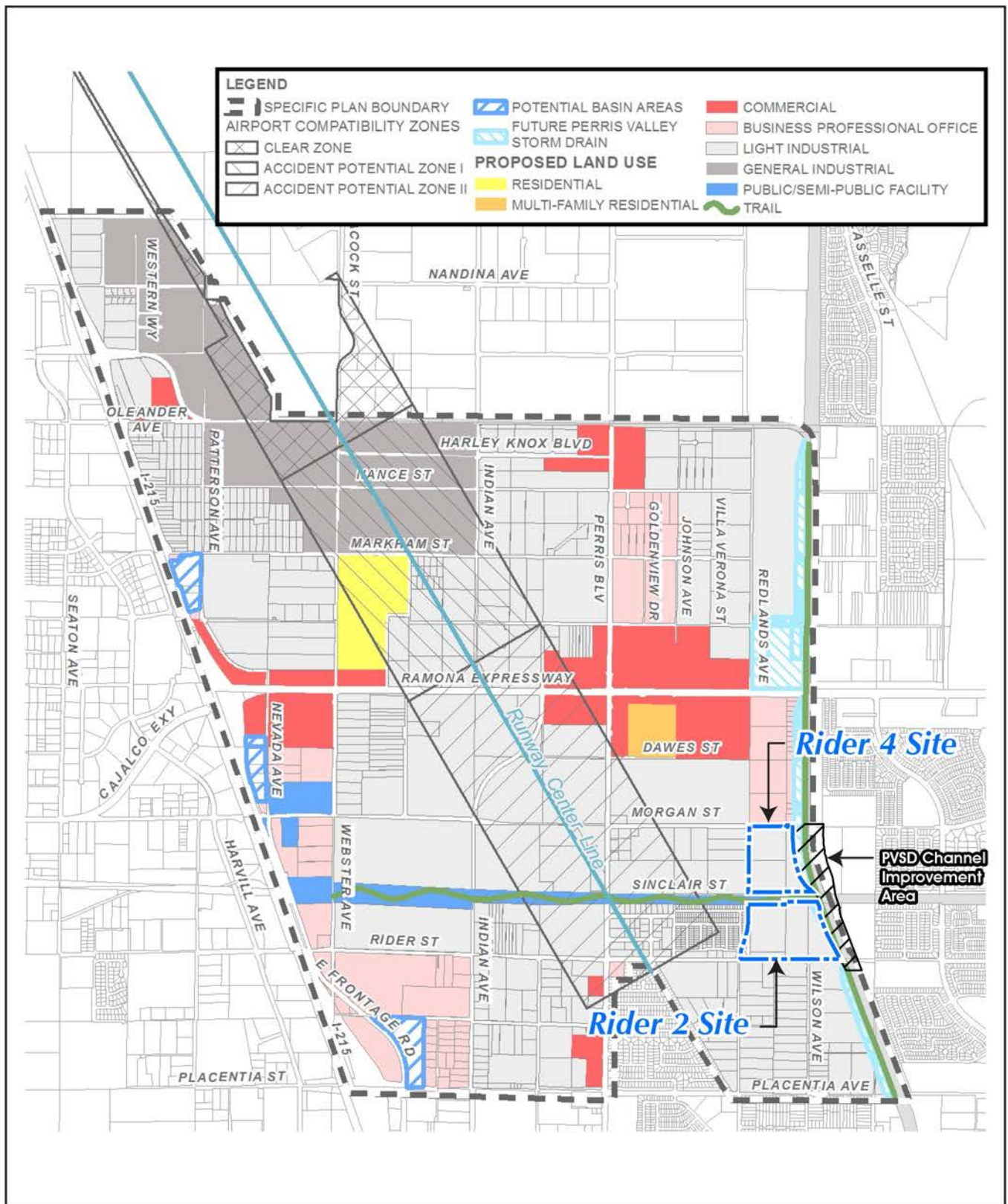
Rider Street is an existing roadway south of the Rider 2 Street, and Redlands Avenue was recently constructed west of the Project area as part of the Rider 3 Project. Morgan Street is unimproved north of the Rider 4 site.

Surrounding Land Uses

As previously shown in Figure 3-2, Aerial Photograph, of this EIR, the Project area is bordered by an operating trailer storage yard facility and the Rider 3 building within the PVCCSP area to the west; undeveloped, vacant land within the PVCCSP area the north; Morgan Park and single family residential uses within the May Ranch Specific Plan area to the northeast; undeveloped, vacant land and single family residential uses within the New Horizons Specific Plan area to the east; and, vacant land, non-conforming residential uses, and the Southern California Edison (SCE) Bunker Substation within the PVCCSP area to the south. It should be noted that the City of Perris plans to construct Morgan Park Phase II, consisting of a lighted soccer field and parking area south of the existing Morgan Park (south of Morgan Street) (City of Perris, 2019b). The park will be constructed in 2020.

General Plan and Zoning Designations

The current General Plan land use designation for the Project area is “PVCC SP – Perris Valley Commerce Center Specific Plan” (City of Perris, 2013). The City of Perris Zoning Map, last updated in October 2016, identifies that the Project area is within the “PVCC SP – Perris Valley Commerce Center Specific Plan” area, and identifies the PVCCSP land use designations (City of Perris, 2020). A discussion of the PVCCSP is provided in Section 4.11.2 below. Figure 4.11-1, *Perris Valley Commerce Center Specific Plan Land Use Designations*, depicts the PVCCSP boundary and approved land use designations within the PVCCSP area. As shown, the Rider 2 and Rider 4 sites have a PVCCSP land use designation of Light Industrial, and the PVSD Channel Improvement area is designated as Future Perris Valley Storm Drain. The MWD property that extends between the Rider 2 and Rider 4 sites is designated Public/Semi-Public Facility, and Trail, including the area that extends into the PVSD Channel improvement area. (City of Perris, 2018)



Source(s): Perris Valley Commerce Center Specific Plan (July 2018)

Figure 4.11-1



Perris Valley Commerce Center Specific Plan Land Use Designations

The Light Industrial designation provides for the development of light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials, and retail-related to manufacturing. As identified in Section 2.1.1, Industrial Uses, of the PVCCSP, this zone correlates with the “Light Industrial” General Plan land use designation.

The Public/Semi-Public Facility designation provides for a wide range of public and semi-public uses such as schools and administrative offices, government facilities, public utilities, recreational facilities, and religious institutions. This zone correlates with the “Public/Semi-Public Facilities/Utilities” General Plan land use designation.

The PVCCSP land use designation for areas surrounding the Project area to west and south is also Light Industrial. The area north of the Project area is designated as Business Professional Office. This zone provides for uses associated with business, professional or administrative services located in areas of high visibility from major roadways with convenient access for automobiles and public transit service. Small-scale warehousing and light manufacturing are also allowed. This zone combines the General Plan Land Use designations of Business Park and Professional Office.

The area immediately to the east of the Project area is within the New Horizons Specific Plan area, which encompasses the area east of the PVSD Channel, south of Morgan Street, north Rider Street and west of Evans Road. The eastern portion of the New Horizons Specific Plan area has been developed with single-family residential uses. The western portion of the New Horizons Specific Plan area, which abuts the Project area, is currently undeveloped and is designated for multi- and single-family residential uses. An expansion of Morgan Park consisting of an athletic field, is approved for an area south of Morgan Street adjacent to the existing residences. The area to the northeast and southeast of the Project area is within the May Ranch Specific Plan area. The area to the northeast is developed with Morgan Park and single-family residential uses beyond park. The area to the southeast is undeveloped with single-family residential uses beyond the undeveloped property.

4.11.2 EXISTING POLICIES AND REGULATIONS

Section 4.8, Land Use and Planning, of the PVCCSP EIR provides a complete discussion of “Regulatory Regulations” relevant to development within the PVCCSP area. Following is a discussion of these regulatory regulations as related to the Project.

Regional

Regional regulatory regulations discussed in the PVCCSP EIR include planning programs related to the March Air Reserve Base (MARB), and the Southern California Association of Governments (SCAG) 2008 Regional Comprehensive Plan (RCP) and 2008 Regional Transportation Plan (RTP). Subsequent to certification of the PVCCSP EIR in January 2012, SCAG adopted the 2012 Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS) (in April 2012), and the 2016-2040 RTP/SCS (April 2016). SCAG’s RTP/SCS is discussed below. The MARB/IP ALUCP is discussed in Section 4.9, Hazards and Hazardous Materials, of this EIR. Additionally, other regional programs applicable to the Project are addressed in the respective topical sections of this EIR (e.g., air quality, biological resource, water quality, etc.).

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a Joint Powers Authority (JPA) under California State law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under State law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties: Riverside, Los Angeles, Orange, San Bernardino, Ventura, and Imperial. As the designated MPO, the federal government mandates SCAG to research and draw up plans for transportation, growth management, hazardous waste management, and air quality. Additionally, SCAG reviews environmental impact reports for projects having regional significance to ensure they are in line with approved regional plans (SCAG, 2020). As identified in Section 15206 of the CEQA Guidelines, regionally significant industrial projects include “A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area.”

SCAG adopted the 2016-2040 RTP/SCS in April 2017 to address the region’s future needs for “mobility, economy, and sustainability”. The 2016-2040 RTP/SCS combines the need for mobility with a “sustainable future” through a reduction in the amount of emissions produced from transportation sources. This would be made through the operation of low or no emission transportation systems by 2040. The RTP/SCS also focuses on the economy, with expectations of shortening the gap between the regional transportation system and economic vitality. To address the mobility challenge of the region’s continuing roadway congestion, the RTP/SCS proposes transportation investments in transit; passenger and high-speed rail; active transportation; transportation demand management; transportation systems management; highways, arterials, and goods movement; aviation and airport ground access; and operations and maintenance projects. These are expected to indirectly create investment opportunities in the region. The 2016–2040 RTP/SCS includes population, household, and employment projections for individual cities and counties, and identifies the regional housing needs allocations for the region. Further, the RTP/SCS provides objectives for meeting emissions reduction targets set forth by the California Air Resources Board (CARB); these objectives were provided in direct response to Senate Bill 375 (SB 375) which was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. (SCAG, 2016)

The 2016-2040 RTP/SCS also includes an appendix titled “Goods Movement” that is applicable to the Project because the Project entails the development of warehouse buildings in the SCAG region that could support a variety of light industrial, warehousing, and logistics users. In April 2018 SCAG published *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region’s freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, state highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet of warehouse building space, and undeveloped land that could accommodate an additional 338 million square feet of new warehouse building space. These regions attract robust logistics activities, and are a major reason why the region is a critical mode in the global supply chain (SCAG, 2018).

The RTP/SCS is updated periodically to allow for the consideration and inclusion of new transportation strategies and methods. SCAG's Regional Council adopted the 2020-2045 RTP/SCS (referred to as "Connect SoCal") and its associated Program EIR on May 7, 2020 for federal transportation conformity purposes only. Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Because Connect SoCal is not entirely adopted, the 2016 RTP/SCS goals and 2016 Program EIR are still valid until the full adoption of Connect SoCal and recertification of the associated Program EIR. Because the goals of the 2016 RTP/SCS are still valid at the time this EIR is being prepared, SCAG recommends completing a Project consistency analysis for goals outlined in the 2016 RTP/SCS and Connect SoCal (Au, 2020).

Local

Section 4.8 of the PVCCSP EIR includes a discussion of the City of Perris General Plan 2030 and the City's Zoning Ordinance (Perris Municipal Code, Title 19), which is based on the status of these regulatory plans prior to adoption of the PVCCSP in January 2012. The following discussion summarizes the current regulatory information for land use and planning that is specifically relevant to the Project, as updated since the PVCCSP EIR was prepared.

City of Perris General Plan

The *City of Perris General Plan 2030* (General Plan) was approved in April 2005 and includes land use policies and land use maps to guide the future development of the City of Perris. As shown in Exhibit LU-1: Planning Areas, of the General Plan Land Use Element, the City of Perris is divided into 10 Planning Areas to provide more detailed land use and policy direction regarding local issues (e.g., land use circulation and open space). The planning areas are defined by similarities and opportunities in land uses, development patterns, and future developments. The Project area lies within Planning Area 3: Agricultural Conversion Area. This Planning Area consists of large tracts of land used primarily for agriculture when the Land Use Element was prepared. Proximity to the I-215 corridor suggests conversion of agricultural land, over the long term, to uses that are compatible with surrounding commercial and industrial uses (City of Perris, 2016a).

The Perris General Plan consists of eight elements, including new or updated elements since approval of the General Plan in 2005. The General Plan elements address issues that affect the City, and include: Housing, Land Use, Circulation, Conservation and Sustainable Community, Noise, Safety, Open Space, and Healthy Community. All activities undertaken by a planning agency must be consistent with the goals and policies of the agency's general plan. The City of Perris General Plan's Land Use Element plays a central planning role in correlating all City land use issues, goals, and objectives into one set of development policies. The Land Use Element includes a Land Use Map (referred to as the General Plan Map), which was updated on January 3, 2013. As previously discussed, the Project area is designated "PVCC SP – Perris Valley Commerce Center Specific Plan" on the General Plan Land Use Map (City of Perris, 2013).

Specific goals and policies of the respective elements of the City's General Plan that are relevant to the Project are provided in Table 4.11-2, *City of Perris General Plan Consistency Analysis*, of this section, along with an analysis of the Project's consistency with these goals and policies.

City of Perris Zoning Code Title 19

The City of Perris Zoning Ordinance (Municipal Code, Title 19) contains the regulatory framework that specifies allowable uses for real property and development intensities; the technical standards such as site layout, building setbacks, heights, lot coverage, and parking; aesthetics related to physical appearance, landscaping, and lighting; a program that implements policies of the General Plan; and the procedural standards for amending or establishing new zoning regulations.

As previously identified, the Project area also has a zoning designation of “PVCC SP – Perris Valley Commerce Center Specific Plan¹.” Specific Plans are plans pertaining to areas or projects in the City. A specific plan is a tool for the systematic implementation of the General Plan. It effectively establishes a link between implementing policies of the General Plan and the individual development proposals in a defined area. A Specific Plan may be as general as setting forth broad policy concepts, or as detailed as providing direction to every facet of development from the type, location, and intensity of uses to the design and capacity of infrastructure, and from the resources used to finance public improvements to the design guidelines of a subdivision. After a Specific Plan has been adopted, subsequent subdivision and development, public works projects, and zoning regulations must be consistent with the Specific Plan (City of Perris, 2019a).

There are currently 13 Specific Plans in the City of Perris. The following is a discussion of the PVCCSP, which is the basis for future development in the PVCCSP area, including the Project area.

Perris Valley Commerce Center Specific Plan

The PVCCSP was adopted by the City of Perris in January 2012 (Ordinance No. 1284) and was last amended in July 2018. The PVCCSP is the culmination of a multi-year planning effort through which the City engaged in planning efforts to ascertain the appropriate land uses in the northwestern area of the City in light of the existence of the MARB to the north, the development of logistics warehouse uses surrounding the MARB, and the changing economic conditions. The City identified the intent of the PVCCSP as follows (City of Perris, 2018):

The intent of the Perris Valley Commerce Center Specific Plan is to provide high quality industrial, commercial, and office land uses to serve the existing and future residents and businesses of the City of Perris. The plan will promote recognition throughout the region for its aesthetic cohesiveness, superior land planning, and architectural design.

The objectives of the PVCCSP seek to promote various land uses for the area, to streamline the development process, to promote sustainable development through the encouragement of “green” technologies, to provide a strong sense of place by establishing an identity for the area, and to identify infrastructure utility needs and to provide plans for vehicular and non-vehicular circulation.

¹ The California Government Code (Title 7, Division 1, Article 8, Section 65450) grants authority to Cities to adopt Specific Plans for purposes of implementing the goals and policies of their General Plans. The California Government Code states that Specific Plans may be adopted either by Resolution or by Ordinance and that the Specific Plan is required to be consistent with the General Plan. (City of Perris, 2018)

In compliance with the requirements of the California Government Code, the PVCCSP adopted a comprehensive land use plan, infrastructure plan, and design Standards and Guidelines. The City of Perris will use the Specific Plan Standards and Guidelines to evaluate development projects subject to discretionary review within the PVCCSP boundaries.

As described in Section 3.0, Project Description, of this EIR, the Project is designed to implement the City's established land use vision as set forth in the PVCCSP and to comply with the PVCCSP development Standards and Guidelines. As noted previously, the Rider 2 and Rider 4 sites have a PVCCSP land use designation of Light Industrial, and the PVSD Channel Improvement area is designated as Future Perris Valley Storm Drain. The MWD property that extends between the Rider 2 and Rider 4 sites is designated Public/Semi-Public Facility, and Trail, including the area that extends into the PVSD Channel improvement area. Allowed land uses under the Light Industrial and Public/Semi-Public Facility designations are presented in Table 2.0-2 of the Specific Plan. Relevant PVCCSP Standards and Guidelines that are incorporated into the Project are listed in the introduction to the analysis for each topical issue in Section 4.0 of this EIR and are assumed in the analysis presented.

4.11.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on land use and planning if it will:

- a. Physically divide an established community.
- b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4.11.4 ENVIRONMENTAL IMPACTS

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to land use and planning. These Standards and Guidelines (summarized below) are incorporated as part of the Project's Rider 2 and 4 buildings (the warehouse component) and are assumed in the analysis presented in this section. The chapters/section numbers provided correspond to the PVCCSP chapters/sections. There are no MMs for land use and planning included in the PVCCSP EIR.

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

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.
- Easements on MWD Property.

Impact Analysis

Threshold a Would the project physically divide an established community?

The PVCCSP EIR Initial Study concludes that the PVCCSP area includes some vacant and agricultural land, but is otherwise developed with light industrial, industrial, commercial, and business park uses. Development of the PVCCSP would not divide or disrupt travel between different parts of the City. The PVCCSP is intended to unify the PVCCSP area to create a higher quality neighborhood. The Initial Study concludes that implementation of the PVCCSP would not divide an established community (City of Perris, 2009).

As shown in Figure 3-2 of this EIR, the Project area is vacant and undeveloped, except for the eastern portion of the Project area that contains a portion of the PVSD Channel. The land uses surrounding the Project area to the north, west and south are within the PVCCSP area and include a mix of undeveloped and vacant land, industrial uses, and non-conforming single-family residences. The area to the east is within the May Ranch and New Horizons Specific Plan areas and includes undeveloped land with Morgan and Morgan Park (to the northeast). As with the Project, development of the areas surrounding the Project area would be implemented in accordance with the respective Specific Plans. The Project involves the development of industrial uses and PVSD Channel improvements, consistent with development and infrastructure improvements anticipated by the PVCCSP. 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. Further, the PVSD Channel improvements would include replacement of the regional trail on the eastern side of the PVSD Channel that connects to existing trails in the area. The Project would not physically divide an established community and no impact would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

The Project would result in no impacts. This is consistent with the conclusion of the PVCCSP EIR Initial Study.

Threshold b Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The PVCCSP EIR concludes that implementation of future development and infrastructure projects in compliance with the PVCCSP would not conflict with any applicable land use plan, policy, or regulation (City of Perris, 2011)

An analysis of the Project’s consistency with existing regional and local plans (including applicable goals, objectives, and policies) is provided below.

Regional

Southern California Association of Governments

SCAG’s 2016 RTP/SCS and Connect SoCal seek to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. These long-range visioning plans balance future mobility and housing needs with economic, environmental and public health goals. Table 4.11-1 below present the Project’s consistency with the 2016-2040 RTP/SCS and Connect SoCal. As demonstrated through this analysis, implementation of the Project would not conflict with the goals and policies of SCAG’s regional planning program.

Table 4.11-1 SCAG Policy Consistency Analysis

RTP/SCS Goal	Goal Statement	Project Consistency Discussion
2016 RTP/SCS		
G1	Align the plan investments and policies with improving regional economic development and competitiveness.	No Conflict. This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive local and regional planning efforts. The Project implements the PVCCSP. The PVCCSP Design Standards and Guidelines intend to create eco-friendly, high-quality developments to establish a regional character that identifies the community. The PVCCSP area is highly sought after due to rapid regional growth, available land, a locally available employee base, proximity to major transportation routes and the MARB/IP Airport. The PVCCSP seeks to unify the area’s character and develop a business community that fosters long-term economic success. Through the utilization of an established set of Guidelines, the PVCCSP, of which the Project is a part, creates mixed-use developments that are aesthetically pleasing while respecting the basic industrial/commercial use and function of the Specific Plan. The Project has been designed in compliance with the applicable Standards and Guidelines outlined in the PVCCSP and optimizes the development intensity on the Rider 2 and Rider 4 building sites which are planned for industrial development.
G2	Maximize mobility and accessibility for all people and goods in the region.	No Conflict. The Project involves industrial development within the Rider 2 and Rider 4 sites (approximately 65 acres) and is located approximately 1.6 miles from the I-215. The Project includes construction of on- and off-site roadway improvements that would allow for efficient access to the Project area and would benefit persons of all social and economic groups who utilize these roadways. Roadway improvements would meet established design requirements for public safety.
G3	Ensure travel safety and reliability for all people and goods in the region.	No Conflict. As disclosed in Section 4.13, Transportation, of this EIR, the Project would not result in a substantial safety hazard to motorists. Additionally, the proposed warehouse buildings would accommodate the movement of goods throughout the region, which would shorten the length of vehicular trips and increase the reliability of the movement of goods throughout the region.

RTP/SCS Goal	Goal Statement	Project Consistency Discussion
G4	Preserve and ensure a sustainable regional transportation system.	No Conflict. The Project contributes to and would be consistent with planned land use and growth assumptions in the City of Perris, as anticipated by the PVCCSP. In addition to the construction of roadway improvements, the Project developers would pay applicable traffic mitigation fees (e.g., North Perris Road and Bridge Benefit District [NPRBBD] fees) that would fund additional traffic improvements in the study area (consistent with the PVCCSP Circulation Plan) and maintenance of roadway infrastructure in the Project area.
G5	Maximize the productivity of our transportation system.	
G6	Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	No Conflict. As discussed in Section 4.13, Transportation, of this EIR, the PVCCSP Standards and Guidelines incorporate pedestrian paths and sidewalks into roadway design, and provide for trails to accommodate non-motorized forms of transportation throughout the Specific Plan area. The Project would include roadway and sidewalk improvements, implementation of a linear trail between the Rider 2 and Rider 4 sites, meeting the intent of the MWD trail anticipated by PVCCSP EIR mitigation measure MM Trans 6), an on-street bikeway along Rider Street, and replacement of the existing regional trail that currently extends along the eastern side of the PVSD Channel and connects to the regional trail system. Additionally, as required by PVCCSP EIR mitigation measure MM Trans 5, bicycle parking and bicycle racks would be provided at the proposed building sites to encourage employees to bicycle to work.
G7	Actively encourage and create incentives for energy efficiency, where possible.	No Conflict. This policy provides guidance to City staff to establish local incentive programs to encourage and promote energy efficient development. A key objective of the PVCCSP is to promote sustainable development and to encourage the use of “green” technologies. In addition to complying with the California Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings and the Title 24 California Green Building Standards Code (CALGreen Code), as presented in Section 4.8, Greenhouse Gas Emissions, of this EIR, the Project incorporates PVCCSP EIR mitigation measures that serve to conserve energy and reduce greenhouse gas emissions. Also refer to the analysis in Section 4.6, Energy, of this EIR, which demonstrates that the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.
G8	Encourage land use and growth patterns that facilitate transit and active transportation.	No Conflict. Refer to the consistency analysis for RTP/SCS Goal G6, which addresses the project’s components that facilitate pedestrian and bicycle travel. This policy provides guidance to establish a local land use plan that facilitates the use of transit and active (non-motorized) forms of transportation. The Project proposes to develop the property with two warehouse buildings in an area designated for Light Industrial development by the PVCCSP. Accordingly, the Project would implement the City of Perris’ vision for the planned and orderly pattern of growth of industrial development within PVCCSP area. The Project also does not include any elements that would impede access to public transit, including transit routes along Rider Street and Redlands Avenue. It should be noted that bus stops have been installed on Redlands Avenue and Rider Street in the vicinity of the Project area as part of the Project Applicant’s Rider 1 and Rider 3 building projects.
G9	Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	No Conflict. The Project is not a transportation project and does not involve the construction of new or expansion of existing transit facilities beyond sidewalks along roadways to be constructed as part of the Project. Therefore, security associated with regional transportation systems is not applicable to the Project. The potential impact of the

RTP/SCS Goal	Goal Statement	Project Consistency Discussion
		Project to public services, including police and fire, is discussed in Section 6.1, Effects Determined Not to be Significant, of this EIR.
Connect SoCal		
1	Encourage regional economic prosperity and global competitiveness.	No Conflict. Refer to the consistency analysis for Goal G1 of the 2016 RTP/SCS.
2	Improve mobility, accessibility, reliability, and travel safety for people and goods.	No Conflict. Refer to the consistency analysis for Goals G2 and G3 of the 2016 RTP/SCS.
3	Enhance the preservation, security, and resilience of the regional transportation system.	No Conflict. Refer to the consistency analysis for Goals G4 and G9 of the 2016 RPT/SCS.
4	Increase person and goods movement and travel choices within the transportation system.	No Conflict. The Project involves development of a contemporary logistics center within an area planned for industrial uses, in proximity to designated truck routes and to the State highway system, which would avoid or shorten truck-trip lengths on other roadways. Also, refer to the consistency analysis for Goals G6 and G8 of the 2016 RTP/SCS, which addresses accommodations for alternative modes of transportation (e.g., transit, bicycle and walking).
5	Reduce greenhouse gas emission and improve air quality.	No Conflict. Refer to the consistency analysis for goals G6 and G7 of the 2016 RTP/SCS.
6	Support healthy and equitable communities.	No Conflict. This policy pertains to health and equitable communities, and these issues area addressed through goals and policies outlined in the Healthy Community Element of the Perris General Plan. Relevant to the Project, the proposed building design would support the health of occupants and users by using non-toxic building materials and finishes, and by using windows and design features to maximize natural light and ventilation. It would also provide employment opportunities close to existing residences, which would allow members of the community to walk or bike to work.
7	Adapt to a changing climate and support an integrated regional development.	No Conflict. Connect SoCal indicates that since the adoption of the 2016 RTP/SCS, there have been significant drivers of change in the goods movement industry including emerging and new technologies, more complex supply chain strategies, evolving consumer demands and shifts in trade policies. E-commerce continues to be one of the most influential factors shaping goods movement. As previously identified, the Project involves the development of two high-cube warehouse buildings that are designed to meet contemporary industry standards and operational characteristics. The Project would accommodate a wide variety of users, and would be economically competitive with similar industrial buildings in the local area and region. Further, the Project is located in an area designated for industrial development in the City of Perris, which benefits from its proximity to key freeway infrastructure (e.g., I-215, SR-60).
8	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	No Conflict. Connect SoCal indicates that the advancement of automation is expected to have considerable impacts throughout regional supply chains. Notably, warehouses, such as those proposed with the Project, are increasingly integrating automation to improve operational efficiencies in response to the surge in direct-to-consumer e-commerce. Additionally, continued developments and demonstrations of automated truck technologies will alter the goods movement environment with far-reaching impacts ranging from employment to highway safety. The Project would meet contemporary industry standards and operational characteristics relative to transportation technologies and data-driven solutions.

RTP/SCS Goal	Goal Statement	Project Consistency Discussion
9	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	No Conflict. The Project is located in an area designated for industrial uses and would not interfere with the City’s ability to encourage the development of diverse housing types that are supported by multiple transportation options in other parts of the City, as appropriate.
10	Promote conservation of natural and agricultural lands and restoration of habitats.	No Conflict. As discussed in Section 4.2, Agriculture and Forestry Resources, of this EIR, the Project involves an orderly conversion of land previously used for agricultural purposes to Light Industrial land uses, as anticipated in the PVCCSP and the City of Perris General Plan. There are no lands on the Project area designated for agricultural uses. with respect to natural resources, refer to the discussion in Table 4.11-2 regarding the Project’s consistency with the Conservation Element of the City’s General Plan. In summary, the Project incorporates mitigation measures from the PVCCSP EIR that would ensure that any potential impacts to burrowing owl and migratory birds would be reduced to a less than significant level. Additionally, the Project Applicant would obtain required permits and approvals for temporary and permanent impacts to jurisdictional areas; however, development of the Project would increase, rather than decrease the jurisdictional area within the PVSD Channel.

Local

Perris Valley Commerce Center Specific Plan and Zoning

As discussed previously, the PVCCSP governs land use within the PVCCSP area and is itself a document devoted to specific land use policies and regulations. The Rider 2 and Rider 4 sites have a PVCCSP land use designation of Light Industrial, and the PVSD Channel Improvement area is designated as Future Perris Valley Storm Drain. The MWD property that extends between the Rider 2 and Rider 4 sites is designated Public/Semi-Public Facility, and Trail, including the area that extends into the PVSD Channel improvement area. No Conflict with these designations, the Project involves the construction and operation of two high-cube warehouse/distribution buildings totaling approximately 1.35 million square feet, as well as associated truck trailer and automobile parking facilities, landscaping, and infrastructure. The Project also implements a linear trail north of the MWD property between the Rider 2 and Rider 4 site. This trail would meet the intent of the segment of the MWD trail required by the PVCCSP . Further, the Project involves implementation of improvements to the existing PVSD Channel and the Rider Street bridge over the Channel that are anticipated by the PVCCSP and the PVCMDP. As described in Section 3.0, Project Description, and identified in the analysis for each topical issue in Section 4.0 of this EIR, the Project implements applicable requirements (Standards and Guidelines) of the PVCCSP related to architecture and design, landscaping (including along Morgan Street, Rider Street, Redlands Avenue, which are a designated “Major Roadway Visual Corridors”), infrastructure, and sustainable development. The Project is consistent with and implements the PVCCSP. The Project does not require a zone change or any amendment to the PVCCSP.

City of Perris General Plan

Activities undertaken by a planning agency must be consistent with the goals and policies of the agency’s general plan. The City of Perris General Plan was approved in 2005, and as subsequently amended, serves as the main land use policy document for the City. Therefore, future development in the City must comply with the General Plan’s goals and policies. The State’s general rule for a General Plan

consistency determination is that “an action, program, or project is consistent with the General Plan if, considering all its aspects, it will further the objectives and policies of the General Plan and not obstruct their attainment” (OPR, 2017).

Table 4.8-B of the PVCCSP EIR addresses the PVCCSP’s consistency with the goals, policies, and measures of the City’s General Plan. The PVCCSP EIR concludes that implementation of the PVCCSP, of which the Project is a part, would not result in inconsistencies with the General Plan goals and policies. Therefore, because the Project is consistent with the PVCCSP, it can be concluded that it is also consistent with the General Plan. However, as required by Section 15125(d) of the State CEQA Guidelines, Table 4.11-2 below addresses the Project’s consistency with applicable goals and policies, as outlined in the City’s General Plan. As identified through this consistency analysis, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect.

Table 4.11-2 City of Perris General Plan Consistency Analysis

GENERAL PLAN GOAL	CONSISTENCY ANALYSIS
Circulation Element	
<p>Goal I. A comprehensive transportation system that will serve projected future travel demand, minimize congestion, achieve the shortest feasible travel times and distances, and address future growth and development in the City.</p>	<p>No Conflict. As described in Section 3.0 of this EIR, the Project would include roadway improvements, including driveways into the building sites, to accommodate Project circulation needs. Specifically, Sinclair Street (between the Rider 2 and Rider 4 buildings, Morgan Street (north of the Rider 4 site), and Rider Street (south of the Rider 2 site) would be improved. Traffic-control improvements would also be implemented as part of the Project. Redlands Avenue, which is along the western boundaries of the Rider 2 and Rider 4 sites, was recently constructed by the Project Applicant as part of the Rider 3 building.</p>
<p>Policy I.A. Design and develop the transportation system to respond to concentrations of population and employment activities, as designated by the Land Use Element and in accordance with the designated Transportation System, Exhibit 4.2, Future Roadway Network (refer to City of Perris General Plan).</p>	<p>No Conflict. Although not required to determine whether the Project would have a significant transportation impact, a traffic analysis was prepared for the Project (included in Appendix L of this EIR) and was used to determine the improvements that are required to be constructed to implement the PVCCSP’s Circulation Plan, consistent with the City’s General Plan for the Future Roadway Network. The Project incorporates the improvements recommended by the traffic analysis (refer to project design feature PDF 13-1 through PDF 13-3) and would construct the PVCCSP roadways that are adjacent to the building sites, as required.</p>
<p>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-n-ride facilities, and pedestrian facilities.</p>	<p>No Conflict. Roadway improvements included as part of the Project would be constructed according to the standards of the City of Perris and would include sidewalks on each roadway, and an on-street bikeway along Rider Street, as required by the PVCCSP. As further discussed in EIR Section 4.13, Transportation, the Project area is located near an existing bus routes along Rider Street (Riverside Transit Authority [RTA] Route 41), transportation corridors, and I-215, which provide the potential for service to park-and-ride facilities. It should be noted that in compliance with PVCCSP EIR mitigation measure MM Trans 4, the Project Applicant coordinated with RTA regarding provision of bus stops in the</p>

GENERAL PLAN GOAL	CONSISTENCY ANALYSIS
	vicinity of the Project, in coordination with the Rider 1 and Rider 3 buildings that were recently completed. At the direction of RTA, bus stops have been installed on Redlands Avenue and Rider Street in the vicinity of the Project area as part of the Project Applicant's Rider 1 and Rider 3 building projects. These bus stops would also serve the Project and no additional bus stops are required.
Goal II. A well planned, designed, constructed, and maintained street and highway system that facilitates the movement of vehicles and provides safe and convenient access to surrounding developments.	No Conflict. In addition to the construction of roadway improvements as required by the PVCCSP, the Project developer would pay applicable traffic mitigation fees (e.g., North Perris Road and Bridge Benefit District [NPRBBD] fees (refer to PVCCSP EIR mitigation measure MM Trans 3), which include the Transportation Uniform Mitigation Fee [TUMF] and City of Perris Development Impact Fee [DIF]), or fair share payments, that would fund additional traffic improvements to General Plan roadways in the Project area and would go toward the maintaining roadway infrastructure in the Project area.
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.	No Conflict. The Project maintains the existing roadway network and provides roadway improvements based on the demand determined by the traffic analysis prepared for the Project.
Goal III. To financially support a transportation system that is adequately maintained.	No Conflict. Refer to the consistency analysis for Circulation Goals I and II, and associated policies, above.
Policy III.A Implement a transportation system that accommodates and is integrated with new and existing development and is consistent with financing capabilities.	No Conflict. The Project incorporates a transportation system that builds upon and improves the existing roadways in the area to support existing development and the Project.
Goal IV. Safe and convenient pedestrian access and non-motorized facilities between residential neighborhoods, parks, open space, and schools that service those neighborhoods.	No Conflict. As required by the PVCCSP, the Project would include sidewalks as part of the roadway improvements constructed adjacent to the building sites. These sidewalks would help to complete pedestrian pathways along roadways that currently do not have sidewalks or curbs and gutters.
Goal V. Efficient goods movement.	No Conflict. The Project involves the development of two warehouses located approximately 1.6 miles from and with near-direct access to I-215, which would allow easy access for inbound and outbound trucks. Additionally, the Project area is located approximately 2.6 miles southeast of March Inland Port (MIP), which is used primarily for the distribution of goods.
Policy V.A. Provide for safe movement of goods along the street and highway system.	No Conflict. All roadway construction and improvements would be completed according to the standards and requirements set forth by the City of Perris and in coordination with the City Engineer to ensure that roadways are safe and efficient.
Goal VII. A transportation system that maintains a high level of environmental quality.	No Conflict: The Project includes roadway improvements required by the PVCCSP and the Project developer would pay traffic fees and fair share fees for roadway improvements to improve the flow of traffic in the Project area by limiting delay times at intersections and improving the overall flow of traffic.
Policy VII.A. Implement the Transportation System in a manner consistent with Federal, State, and local environmental quality standards and regulations.	No Conflict. This EIR has been prepared in accordance with the State CEQA Guidelines. Further, although not required to determine transportation impacts pursuant to CEQA, a traffic analysis has been prepared for the Project in accordance with

GENERAL PLAN GOAL	CONSISTENCY ANALYSIS
	<p>the guidance provided by the City of Perris, the County of Riverside, and the California Department of Transportation (Caltrans). Through the required public review of the EIR, local, State, and federal agencies can comment on the Project and its consistency with the applicable standards and regulations. By considering the comments of these agencies in the EIR and throughout the development process, the Project would maintain consistency.</p>
<p>Goal VIII. Enhanced traffic flow, reduced travel delay, reduced reliance on single-occupant vehicles, and improved safety along the City and State roadway system.</p>	<p>No Conflict. The Project design incorporates improvements to local roadways based on the projection of future traffic resulting from the Project. These improvements—as well as the required mitigation measures that would provide funding for any necessary improvements to local roadways—would ensure that traffic delays are minimized and safety is increased. Additionally, refer to the consistency analysis for RTP/SCS Goal 6 which addresses non-vehicular transportation.</p>
<p>Conservation Element</p>	
<p>Goal I: Agricultural Resources. Orderly conversion of agricultural lands.</p>	<p>No Conflict. As stated in Section 4.2, Agriculture and Forestry Resources, of the EIR, the Project is an orderly conversion of land previously used for agricultural purposes to Light Industrial land uses, as anticipated in the PVCCSP and the City of Perris General Plan. There are no lands on the Project area designated for agricultural uses.</p>
<p>Goal II: Biological Resources. Preservation of areas with significant biotic communities.</p> <p>Policy II.A. Comply with state and federal regulations to ensure protection and preservation of significant biological resources.</p>	<p>No Conflict. As identified in Section 4.4, Biological Resources, of this EIR, required biological surveys were conducted for the Project to determine the presence or absence of protected biological resources or protected habitat areas. Based on a Project-specific Habitat Assessment, the Rider 2 and Rider 4 building sites and site-adjacent roadway improvement areas do not contain any special-status vegetation communities. The PVSD Channel improvement area does not support potential habitat for riparian birds or fairy shrimp but does support both state and federal jurisdictional waters and MSHCP Riparian/Riverine areas. No vernal pools are present. While there would be temporary and permanent impacts to jurisdictional areas, the proposed PVSD Channel improvements would increase the overall limits of Army Corps of Engineers (Corps)/Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife (CDFW), and MSHCP Riparian/Riverine habitats and Public/Quasi-Public (PQP) Conserved Lands by at least 20 acres. As such, development of the Project would increase, rather than decrease the preservation of areas with biotic communities. The Project Applicant would obtain required permits and approvals for impacts to jurisdictional areas.</p> <p>Based on focused surveys for burrowing owl and sensitive plant species no burrowing owl or sensitive plants are present within the Project area. However, construction of the Project has the potential to impact burrowing owl, if present during construction, and migratory birds if construction occurs during the peak bird nesting season. The Project incorporates</p>

GENERAL PLAN GOAL	CONSISTENCY ANALYSIS
	mitigation measures from the PVCCSP EIR that would ensure that any potential impacts to burrowing owl and migratory birds would be reduced to a less than significant level.
<p>Goal III: Biological Resources. Implementation of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).</p> <p>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.</p>	<p>No Conflict. As stated in Section 4.4, Biological Resources, of this EIR, the Project area is not located within an MSHCP Cell Criteria Area, proposed MSHCP Conservation Area, or MSHCP Cores and Linkages. However, the Project area is in an MSHCP-designated Burrowing Owl Survey Area, a Criteria Area Plant Species Survey Area, and in a Narrow Endemic Plant Species Survey Area. In compliance with the requirements of the MSHCP, habitat assessments and focused surveys for Burrowing Owl and Criteria Area and Narrow Endemic Plant Species, were conducted for the entire Project area and site-adjacent improvement areas. A jurisdictional delineation was conducted for the PVSD Channel improvement area; however, the habitat assessment determined there are no jurisdictional areas within the Rider 2 and Rider 4 building sites. The biological resources technical reports are provided in Appendix C of this EIR. The Project's consistency with the MSHCP was also reviewed and it was determined that, with implementation of the required mitigation measures, the Project would be consistent with and implement the MSHCP.</p>
<p>Goal IV: Cultural Resources. Protection of historical, archaeological, and paleontological sites.</p> <p>Policy IV.A. Comply with state and federal regulations and ensure preservation of the significant historical, archaeological, and paleontological resources.</p>	<p>No Conflict. In compliance with mitigation measure MM Cult 1 of the PVCCSP EIR, a Phase I Cultural Resources Study was prepared for the Project to address potential impacts to historic and archaeological resources. Additionally, a Paleontological Resources and Mitigation Monitoring Assessment was prepared. These reports are included in Appendix D and Appendix G, of this EIR, respectively. No historic, archaeological, or paleontological resources were found within the Project area and site-adjacent improvement areas during site surveys, and no resources were identified based on the records searches conducted. However, due to the potential to encounter unknown resources during construction, mitigation measures are incorporated into the Project (refer to mitigation MM 5-1 and MM 5-2 in Section 4.5, Cultural Resources, and mitigation measure MM 7-1 in Section 4.7, Geology and Soils), which include requirements for monitoring and actions to be taken in the event resources are discovered during construction. These measures have been incorporated into the Project to ensure that any significant historic, archaeological, and/or paleontological sites encountered during construction are protected in accordance with local, State, and federal regulations. It should also be noted that a <i>Class III Section 106 (NHPA) Study for the Perris Valley Storm Drain Channel Widening Project</i> has been prepared in compliance with the National Historic Preservation Act to address potential impacts to archaeological resources from the PVSD Channel improvements; this study would be used by the Corps when considering permits to federal jurisdictional resources.</p>
<p>Goal V: Water Supply. An adequate water supply to support existing and future land uses, anticipated in the Land Use Element.</p>	<p>No Conflict. As discussed in Section 4.15, Utilities and Service Systems, of this EIR, a Water Supply Assessment (WSA) was prepared for the Project by the Eastern Municipal</p>

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<p>Policy V.A. Coordinate land-planning efforts with local water purveyors.</p>	<p>Water District (EMWD), the local water purveyor. The WSA is included in Appendix M of this EIR and concludes that EMWD has sufficient water supplies available to serve the Project and future uses from EMWD's entitlements and resources. The land use considered for the Project area in EMWD's 2015 Urban Water Management Plan (UWMP) demand projection was Business Park/Light Industrial/Warehouse, Business Park/Light Industrial, and Open Space Recreation. Accordingly, the demand for this Project is anticipated to be within the limits of the projected demand accounted for in the 2015 UWMP. The combined total demand from this Project and other new/planned developments falls below the total amount of new demand anticipated in the 2015 UWMP.</p>
<p>Goal VI: Water Quality. Achieve regional water quality objectives and protect the beneficial uses of the region's surface and groundwater.</p>	<p>No Conflict. As discussed in Section 4.10, Hydrology and Water Quality, of this EIR, Preliminary Water Quality Management Plans (WQMP) have been prepared for the Rider 2 and Rider 4 building sites that include Best Management Practices (BMPs) to manage post-development water quality to protect regional water quality. In addition, the Project development would be required to submit a Storm Water Pollution Prevention Plan (SWPPP) to and receive approval from the City of Perris. The SWPPP would include a surface water control plan and erosion-control plan citing specific measures to control on- and off-site erosion during the entire grading and construction period.</p> <p>As discussed in Section 4.7, Geology and Soils, of this EIR, based on data from a monitoring well located approximately 0.9 mile from the Rider 2 site and 0.75 mile from the Rider 4 site, a high groundwater depth of approximately 26 feet was reported and is considered to be conservative with respect to recent site conditions. Therefore, Project construction and operation, which would not extend below a depth of approximately 15 feet (for installation of infrastructure) would not impact groundwater.</p>
<p>Policy VI.A. Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).</p>	<p>No Conflict. As discussed in Section 4.10, Hydrology and Water Quality, of this EIR, implementation of the Project would involve grading more than 1 acre. Therefore, the Project developer would be required to obtain a National Pollutant Discharge Elimination System (NPDES) General Construction permit and comply with permit requirements effective at the time of construction.</p>
<p>Goal VIII. Create a vision for energy and resource conservation and the use of green building design of the City, to protect the environment, improve quality of life, and promote sustainability.</p>	<p>No Conflict. As previously identified, an objective of the PVCCSP is to promote sustainable development. Refer to the consistency analysis for RTP/SCS Goal 7, which addresses the energy efficiency and conservation.</p>
<p>Policy VIII.A. Adopt and maintain development regulations that encourage water and resource conservation.</p>	<p>No Conflict. As identified in Section 3.0, Project Description, and further discussed in Section 4.8, Greenhouse Gas Emissions, and Section 4.15, Utilities and Service Systems, of this EIR, the PVCCSP and PVCCSP EIR includes requirements related to water and resource conservation. These requirements have been incorporated into the Project. Notably, as with all new development in the City of Perris and in the EMWD service area, the Project would install water efficient devices and landscaping.</p>

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<p>Policy VIII.B. Adopt and maintain development regulations that encourage recycling and reduced waste generation by construction projects.</p>	<p>No Conflict. As discussed in Section 4.15, Utilities and Service Systems, the Project would comply with the requirements of the CalGreen Code to divert at least 65 percent of construction waste from landfills. This exceed the 50 percent diversion requirement established in Chapter 7.44, Construction and Demolition Waste Management, of the City's Municipal Code.</p>
<p>Goal IX. Encourage project designs that support the use of alternative transportation facilities.</p>	<p>No Conflict. Refer to the consistency analysis for RTP/SCS Goal G6 and Goal G8, which address the use of alternative transportation facilities.</p>
<p>Goal X. Encourage improved energy performance standards above and beyond the California Title 24 requirements.</p>	<p>No Conflict. The Conservation Element was adopted in 2005 and California Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings have been revised numerous times. Notably, the 2019 Title 24 Standards became effecting in January 2020. Additionally, the Title 24 California Green Building Standards Code (CALGreen Code) went into effect in 2011. The Project would comply with the current Title 24 and CalGreen Code requirements in effect at the time building permits are issues, and requirements outlined in the PVCCSP and PVCCSP EIR relative to energy conservation, including the requirement for installation of energy-efficient street lighting throughout the project area.</p>
<p>Land Use Element</p>	
<p>Goal II. New development consistent with infrastructure capacity and municipal services capabilities.</p> <p>Policy II.A Require new development to pay its full, fair-share of infrastructure costs.</p>	<p>No Conflict. The PVCCSP includes an Infrastructure Plan that identifies the utility infrastructure necessary to serve the allowed development in the PVCCSP area. Each individual development, including the Project, is required to implement the infrastructure needed to serve its proposed uses. Water, wastewater, drainage, and dry utility lines that would be installed as part of the Project are described in Section 3.0, Project Description, of this EIR. Further, the Project includes implementation of a segment of the regional PVSD Channel improvements planned adjacent to the building sites.</p>
<p>Goal III. Commerce and industry to provide jobs for residents at all economic levels.</p> <p>Policy III.A Accommodate diversity in the local economy.</p>	<p>No Conflict. As identified in the Project's Notice of Preparation and Section 6.1, Effects Determined Not be Significant, of this EIR, the Project would generate construction jobs and, during operation, potentially employ 1,333 new employees. It is anticipated that there would be employment opportunities generated for residents.</p>
<p>Goal IV. Consistency among all planning documents.</p>	<p>No Conflict. As addressed in the respective sections of this EIR, implementation of the Project would be consistent with applicable local planning documents, including the Perris General Plan, Zoning Code, and the PVCCSP through adherence to the site's General Plan land use designation and zoning associated with the PVCCSP and incorporation of applicable Standards and Guidelines from the Specific Plan. Further the Project is consistent with the South Coast Air Quality Management District's (SCAQMD's) Air Quality Management Plan (refer to EIR Section 4.3, Air Quality), the MSHCP (refer to discussion provided for Goal III of the Conservation Element), and regional plans addressing water quality requirements (refer to Section 4.5, Hydrology and</p>

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	Water Quality) and MARB/IP Airport uses (refer to discussion provided in Section 4.9, Hazards and Hazardous Materials).
<p>Goal V. Protection from natural or man-made disasters.</p> <p>Policy V.A. Restrict development in areas at risk of damage due to disasters.</p>	<p>No Conflict. As discussed in EIR Section 4.10, Hydrology and Water Quality, the Project area is located within the 100-year floodplain. However, the PVSD Channel improvements that would be implemented as part of the Project would contain a 100-year storm event, and would remove the Rider 2 and Rider 4 sites from the 100-year floodplain.</p> <p>As identified in EIR Section 4.7, Geology and Soils, the Project area is not within an Alquist-Priolo Earthquake Fault Zone. Further, compliance with requirements of the PVCCSP EIR, the City's General Plan measures, and recommendations from the Project-specific geotechnical report would ensure that potential impacts related to geology and soils are less than significant.</p>
Noise Element	
<p>Goal I: Land Use Siting. Future land uses compatible with projected noise environments.</p> <p>Policy I.A The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development.</p>	<p>No Conflict. As discussed in Section 4.12, Noise, of this EIR, the background ambient noise levels in the vicinity of the Project area are dominated by the transportation-related noise associated with the arterial roadway network. Additional background noise sources include aircraft overflight noise from the MARB/IPA. Based on State of California Noise/Land Use Compatibility Criteria presented in Exhibit N-1 of the General Plan Noise Element, industrial uses, such as the Project, are considered normally acceptable with exterior noise levels of up to 70 dBA CNEL, and conditionally acceptable with exterior noise levels between 70 to 80 dBA CNEL. Based on projected traffic noise levels along roadways adjacent to the Rider 2 and Rider 4 building sites presented in Section 4.12, the Project would be exposed to estimated exterior noise levels of 64.0 dBA CNEL along Morgan Street, 73.6 dBA CNEL along Redlands Avenue, and 75.4 dBA CNEL along Rider Street. Therefore, the noise levels would not exceed those considered conditionally acceptable, and conventional construction would ensure that the noise levels are compatible with the proposed industrial use.</p>
<p>Goal II: Existing Sensitive Receptors. Roadway improvements compatible with existing noise-sensitive land uses.</p> <p>Policy II.A. Appropriate measures shall be taken in the design phase of future roadway widening projects to minimize impacts on existing sensitive noise receptors.</p>	<p>No Conflict. The Project includes construction of Morgan Street at the half-section width for a Local Street (60-foot right-of-way) between Redlands Avenue and the Project's eastern boundary. A cul-de-sac would be constructed at the eastern end of Morgan Street. Street improvements for Redlands Avenue (to its ultimate full-width as a Secondary Arterial) are being constructed as part of the Rider 1 and Rider 3 projects; this includes street improvements to the curb on the east side of the roadway adjacent to the Rider 2 and Rider 4 sites. Rider Street would be constructed to its ultimate half-section width as a Secondary Arterial (94-foot right-of-way) between Redlands Avenue and the Project's eastern boundary. The City of Perris Municipal Code limits the hours for construction to between 7:00 AM and 7:00 PM and prohibits construction on Sundays and most legal holidays. Mitigation measure MM Noise 1 from the PVCCSP EIR requires construction equipment to operate with adequate mufflers. Mitigation measure MM Noise 1 also requires that stationary equipment</p>

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	<p>(e.g., compressors or welders) be oriented to direct noise away from the nearest sensitive receptors. Mitigation Measures MM Noise 2 and MM Noise 3 require stationary equipment, stockpiles, and staging areas to be at least 446 feet from an occupied residence or incorporate additional noise-reduction measures. Mitigation measure MM Noise 4 limits haul truck deliveries to the same hours allowed for construction. Project-specific mitigation measure MM 12-1 requires a 100-foot buffer between requires a minimum 100-foot buffer zone separating large construction equipment (e.g. dozers, graders, scrapers, etc.) from receiver locations R2 and R7 (Morgan Park and residential uses south of Rider Street). With implementation of these measures, the Project would not result in a substantial temporary or periodic increase in ambient noise levels during construction of the proposed roadways improvements. No off-site traffic noise levels would result along the roadway segments being implemented as part of the Project.</p>
<p>Goal IV: Air Traffic Noise. Future land uses compatible with noise from air traffic.</p>	<p>No Conflict. Section 4.12, Noise, of this EIR, addresses noise exposure from MARB/IP Airport operations. As identified, Compatibility Zones C1 and D are considered to have a moderate to low noise impact. The majority of the Project area is within the 55 dBA CNEL contour with a portion of the western part of the Rider 2 site within 60 dBA CNEL contour. The Project would not expose people working at the site to excessive noise levels from airport operations.</p>
<p>Goal V: Stationary Source Noise. Future non-residential land uses compatible with noise-sensitive land uses.</p> <p>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.</p>	<p>No Conflict. As discussed in Section 4.12, Noise, of this EIR, there are sensitive receptors within 160 feet of the Project area. The Project would contribute a daytime operational noise level increase of up to 0.2 dBA Leq and a nighttime operational noise level increase of up to 1.4 dBA Leq at the sensitive receiver locations. Since the Project-related operational noise level contributions would not exceed the significance criteria of 5 dBA when the without Project noise levels are below 60 dBA CNEL or 3 dBA when the without Project noise levels exceed 60 dBA CNEL, the increases at the sensitive receiver locations are considered less than significant and no mitigation is required.</p>
<p>Open Space Element</p>	
<p>Goal I. Recreational opportunities available to all members of the community.</p>	<p>No Conflict. The Project does not involve the development of residential uses, and the proposed industrial uses would not create an increase in the demand for recreational facilities such as neighborhood and regional parks. However, as described in Section 3.0, Project Description, in compliance with Section 8.2 of the PVCCSP, the Project would provide employee amenities.</p>
<p>Goal II. Establish comprehensive trail system for pedestrian, bicycle, and equestrian use.</p>	<p>No Conflict. As shown in Figure 3.0-5, Trails Plan, of the PVCCSP, a planned regional trail is located along the PVSD Channel in the Project area. The Project would include 15-foot wide access roads on each side of the PVSD Channel. The eastern access road would also serve as a regional trail, consistent with the PVCCSP, and would replace the existing trail that currently extends along the eastern side of the PVSD Channel and connects to Morgan Park northeast of the</p>

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	<p>Project area. The Project also would support local non-vehicular circulation. As noted in Section 3.0, Project Description, roadway construction and improvements would include a 55-foot wide greenbelt, south of the Rider 4 site; the greenbelt would include a meandering decomposed granite trail, landscaping and a circular like turnaround, consistent with the requirements outlined in the PVCCSP for the MWD Trail.</p>
Safety Element	
<p>Goal I. Reduced risk of damage to property or loss of life due to natural or man-made disasters.</p> <p>Policy I.B: Flooding. The City of Perris shall restrict future development in areas of high flood hazard until it can be shown that risk is or can be mitigated.</p>	<p>No Conflict. Refer to the consistency analysis for Goal V and Policy V.5 of the Land Use Element, above.</p>
<p>Policy I.D. Consult the AICUZ Land Use Compatibility Guidelines and ALUCP Airport Influence Area development restrictions when considering development project applications.</p>	<p>No Conflict. The Project area is located within the MARB/IP Airport Influence Area (AIA). Specifically, the Rider 2 site is within the Outer Horizontal Surface and Approach/Departure Clearance Surface of the Federal Aviation Regulations (FAR), Part 77 (Imaginary Surfaces), and Compatibility Zone C1 (Primary Approach/Departure Zone) and Zone D (Flight Corridor Buffer) of the 2014 MARB/IP Airport Land Use Compatibility Plan (ALUCP). The Rider 4 site is within the Outer Horizontal Surface, Transitional, Conical Surface, and Primary Approach/Departure Clearance Surface of the FAR, Part 77 (Imaginary Surfaces), and Compatibility Zone D of the 2014 MARB/IP ALUCP. The Project would not exceed the occupancy limits established for land uses within the AIA. As identified in EIR Section 4.9, Hazards and Hazardous Materials, the Project incorporates and would comply with PVCCSP EIR mitigation measures MM Haz 2 through MM Haz 6. While the height of the proposed building would not require Federal Aviation Administration (FAA) notification pursuant to Part 77 of the FAR, it is possible that construction equipment would encroach into the imaginary surface, requiring notification, consistent with PVCCSP EIR mitigation measure MM HAZ-6. The PVCCSP EIR measures would be incorporated in the Mitigation Monitoring and Reporting Program and conditions of approval for the Project.</p>
<p>Policy I.E Seismic Hazards. All development will be required to include adequate protection from damage due to seismic incidents.</p>	<p>No Conflict. As identified in Section 4.7, Geology and Soils, of this EIR, the PVCCSP EIR, and the California Building Code (CBC), as adopted by the City, provide guidelines and parameters that reduce the effects of ground shaking produced by regional seismic events, and the Project proponent would be required to implement seismic design considerations in accordance with the current CBC, which is reflected in General Plan Measure I.E.5. Further, consistent with General Plan measures and mitigation measure MM Geo 1 from the PVCCSP EIR, the Project would be designed and constructed in accordance with all final Geotechnical Report recommendations (General Plan Measure I.E.2).</p>
<p>Goal II. Improved response times for emergency service providers (police, fire, medical services).</p>	<p>No Conflict. The Project would construct roadways adjacent to the building sites necessary to serve the proposed uses and would improve emergency access to the Project area and</p>

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<p>Policy II.A. The City shall require roadway improvements to expedite quick and safe travel by emergency responders.</p>	<p>surrounding areas. Roadway improvements and access would be constructed in accordance with City standards. This would ensure that access is suitable for quick and safe travel for emergency responders.</p>
<p>Policy II.B. Provide adequate emergency facilities to serve existing and future residents.</p>	<p>No Conflict. As identified in EIR Section 6.1.3, Public Services and Recreation, of this EIR, development of the Project would not cause staffing, facilities, or equipment for public services to operate at a deficient level of service. Further, the Project would be required to pay NPRBBD fees, inclusive of the City's Development Impact Fee (DIF), which provides a funding source to construct the police, fire, community amenities, government facilities, and roadway infrastructure necessary to mitigate the impacts of the growth expected in the City of Perris over the next 25 years, including within the PVCCSP area.</p>
<p>Healthy Community Element</p>	
<p>Goal HC-1. Citywide Health – Foster educational opportunities that show a connection between “place” and health.</p> <p>Policy HC 1.3. Improve safety and the perception of safety by requiring adequate lighting, street visibility, and defensible space,</p>	<p>No Conflict. As described in Section 4.1, Aesthetics, of this EIR, development of the Project with industrial uses would introduce new permanent sources of light into the area in the form of signage, building lighting, and parking lot lighting for nighttime operations, security, and safety. Street lighting would also be installed along Rider Street and Morgan Street.</p>
<p>Goal HC-2. Community Design – Facilitate local efforts to improve the opportunities and choices for a healthy and active lifestyle.</p> <p>Policy HC 2.1. Implement the Perris Trail Master Plan</p>	<p>No Conflict. The Project would include roadway and sidewalk improvements, implementation of a linear trail between the Rider and Rider 4 sites, meeting the intent of the MWD trail anticipated by PVCCSP EIR mitigation measure MM Trans 6), and replacement of the existing regional trail that currently extends along the eastern side of the PVSD Channel and connects to the regional trail system.</p>
<p>Policy HC 2.3. Promote increased physical activity, reduced driving and increased walking, cycling and public transit by:</p> <ul style="list-style-type: none"> • 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 	<p>No Conflict. Refer to the consistency analysis for Policy I.B and Goal IV of the Circulation Element, above, regarding pedestrian and bicycle travel and facilitating the use of transit.</p>
<p>Policy HC 2.4. Promote development patterns and policies that:</p> <ul style="list-style-type: none"> • 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 	<p>No Conflict. As further discussed in Section 4.13, Transportation, the Project is in a designated low vehicle miles traveled (VMT) area and the Project VMT per employee would be less than the established citywide average, which would also serve to reduce commute times. The Project Applicant would develop the vacant Rider 2 and Rider 4 sites with industrial uses consistent with the design guidelines and development standards outlined in the PVCCSP. The Project includes employee amenities, which would provide space for future employees to interact, and would also include a linear trail/landscaped area that would also provide an area for people to congregate and interact.</p>
<p>Policy HC 2.6 Encourage land use and urban design to promote physical activity, provide access to nutritious foods, and reduce air pollution</p>	<p>No Conflict. Refer to the consistency analysis for Policy HC 2.2, Policy HC 2.3, and Policy HC 2.4, above, which address the Project's consistency with policies that promote physical</p>

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	activities. Also, refer to the consistency analysis for Goal G6 of the 2016 RTP/SCS, which addresses air quality.
<p>Goal HC-3. Multimodal Transportation – Support efforts to create transportation options beyond an auto-centric focus.</p> <p>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</p>	<p>No Conflict. Refer to the consistency analysis for Policy I.B of the Circulation Element, which addresses a variety of transportation options relevant to the Project.</p>
<p>Policy HC 3.4. Ensure that regional trail plans are implemented at the development plan review level.</p>	<p>No Conflict. Refer to the consistency analysis for Policy HC 2.1, above, which address the Project’s consistency with regional trail plans.</p>
<p>Policy HC 3.5. Promote job growth within Perris to reduce the substantial out-of-Perris job commutes that exist today</p>	<p>No Conflict. As identified in the Project’s Notice of Preparation and Section 6.1, Effects Determined Not be Significant, of this EIR, the Project would generate construction jobs and, during operation, potentially employ 1,333 new employees. It is anticipated that there would be employment opportunities generated for local residents.</p>
<p>Goal 4. Public and Open Space – Facilitate the creation and maintenance of spaces for public recreation.</p> <p>Policy HC 4.1. Promote public spaces that foster positive human interaction and healthy lifestyles</p>	<p>No Conflict. Refer to the consistency analysis for Goal I and Goal II of the Open Space Element, and Policy HC 2.4, above, which address spaces for interaction.</p>
<p>Goal HC-6. Healthy Environment – Support efforts of local businesses and regional agencies to improve the health of our region’s environment.</p> <p>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</p>	<p>No Conflict. As previously identified, an objective of the PVCCSP is to promote sustainable development. Refer to the consistency analysis for Goal G6 and G7 of the 2016 RTP/SCS, above, regarding air quality and health of the residents in the region. Also, refer to the consistency analysis for Connect SoCal Goal 8, which addresses new technology.</p>
<p>Policy HC 6.2. Support regional water quality efforts that balance water conservation, use of recycled water, and best practices in watershed management</p>	<p>No Conflict. Refer to the consistency analysis for Policy VIII.A of the Conservation Element, above, which addresses water and resource conservation. Further, as discussed in Section 4.10, Hydrology and Water Quality, of this EIR, the Project would be implemented in compliance with applicable regulations for the protection of water quality during construction and operation.</p>
<p>Policy HC 6.3. Promote measures that will be effective in reducing emissions during construction activities:</p> <ul style="list-style-type: none"> • Perris will ensure that construction activities follow existing South Coast Air Quality Management District (SCAQMD) rules and regulations • All construction equipment for public and private projects will also comply with California Air Resources Board’s vehicle standards. For projects that may exceed daily construction emissions established by the SCAQMD, Best Available Control Measures will be incorporated to reduce construction emissions to below daily emission standards established by the SCAQMD • Project proponents will be required to prepare and implement a Construction Management Plan which will include Best Available Control Measures among others. Appropriate control measures will be determined on a 	<p>No Conflict. As further discussed in Section 4.3, <i>Air Quality</i>, of this EIR, the Project would be implemented in compliance with applicable SCAQMD rules in place to protect air quality in the region during construction activities. Additionally, the Project incorporates mitigation measures from the PVCCSP EIR to reduce Project-related construction emissions, and additional Project-specific mitigation measures have been identified to further reduce air quality emissions during construction.</p>

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project by project basis, and should be specific to the pollutant for which the daily threshold is exceeded	
Source (Policies): (City of Perris, 2008a; City of Perris, 2008b; City of Perris, 2016b; City of Perris, 2016c; City of Perris , 2006; City of Perris, 2015; City of Perris, 2016a)	

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusion of the PVCCSP EIR.

4.11.5 CUMULATIVE IMPACTS

As identified in Section 5.0, Other CEQA Topics, of the PVCCSP EIR, this cumulative impact analysis considers development of the Project in relation to the City’s General Plan land use policies and zoning ordinances, along with other developmental policies. The PVCCSP EIR concludes that cumulative impacts associated with the development of allowed uses under the PVCCSP, which would include the Project, would be consistent with all applicable General Plan Policies and regional plans, and cumulative impacts would be less than significant.

Consistent with this conclusion and as discussed in this section, the Project would not result in a significant impact on land use and planning. Implementation of cumulative development in accordance with the General Plan and the PVCCSP, including the Project, would continue to convert undeveloped land to urban uses. The character and overall intensity of the Project are consistent with existing land uses within the City and in the Project vicinity. The Project is therefore consistent with the planned development for the Project area. Furthermore, cumulative development projects would be reviewed for consistency with adopted land use plans and policies by the City of Perris (including General Plan policies and zoning requirements), in accordance with the requirements of CEQA, the state Zoning and Planning Law, and the State Subdivision Map Act, all of which require findings of plan and policy consistency prior to approval of entitlements for development. Future development in the City would also be governed by policies, implementation measures, and programs to ensure orderly urban development.

Therefore, it can be assumed that through these requirements, future development would be consistent with adopted goals and polices and compatible with existing land uses. However, even if the cumulative impact of these projects would be significant, the Project’s contribution to such cumulative land use impacts is less than significant and is thus not cumulatively considerable because (1) the proposed development would not change the type or amount of development anticipated by the City’s General Plan and PVCCSP; (2) the Project does not conflict with adopted goals and policies as identified through the analysis presented in this section.

4.11.6 REFERENCES

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4.12 **NOISE**

This section identifies and evaluates the Project's potential to have adverse effects related to noise during construction and operation. The following analysis is based on the Perris Valley Commerce Center Specific Plan (PVCCSP) Environmental Impact Report (EIR), and two Project-specific technical studies prepared by Urban Crossroads, including the *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Noise Impact Analysis, City of Perris* (Noise Analysis) (August 2020) that assumes all truck traffic would utilize the Harley Knox interchange at I-215 (Urban Crossroads, 2020a), and the *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Focused Off-Site Analysis Noise Memo (With I-215 Freeway/Placentia Avenue Interchange), City of Perris* (Focused Off-site Noise Analysis) (July 2020) that assumes Project-related truck traffic would utilize the Placentia Avenue interchange with I-215 (Urban Crossroads, 2020b). The Noise Analysis and Focused Off-site Noise Analysis are included in Appendix K of this EIR.

There were no Notice of Preparation (NOP) comment letters received addressing noise issues. At the November 6, 2019 Draft EIR public scoping meeting, the Planning Commissioners requested that the Draft EIR address potential impacts to adjacent residential uses, including impacts due to noise.

4.12.1 **EXISTING SETTING**

Section 4.9, Noise, of the PVCCSP EIR, includes a detailed discussion of the current environmental setting, which includes the following subsections related to noise issues: acoustical analysis background, groundborne vibration background, existing noise levels, and existing traffic noise levels. Additional information about the fundamentals of noise is provided in the Noise Analysis included in Appendix K of this EIR. The discussion in this section focuses on information that is either particularly relevant to the Project or specific to the Project area.

Acoustical Analysis Background

The PVCCSP EIR defines noise as unwanted or objectionable sound. The effect of noise on people can include general annoyance, interference with speech communication, sleep disturbance and, in the extreme, hearing impairment. The unit of measurement used to describe a noise level is the decibel (dB). However, since the human ear is not equally sensitive to all frequencies within the sound spectrum, the "A-weighted" noise scale, which weights the frequencies to which humans are sensitive, is used for measurements. Noise levels using A-weighted measurements are written dB(A) or dBA. Decibels are measured on a logarithmic scale which quantifies sound intensity in a manner that is similar to the Richter scale used for earthquake magnitudes. In the case of noise, a doubling of the energy from a noise source, such as the doubling of a traffic volume, would increase the noise level by 3 dBA; a halving of the energy would result in a 3 dBA decrease.

The PVCCSP EIR further states that average noise levels over a period of minutes or hours are usually expressed as dB Leq or the equivalent noise level for that period of time. For example, Leq₍₃₎ would represent a three-hour average. When no time-period is specified, a one-hour average is assumed. Noise standards for land use compatibility are stated in terms of the Community Noise Equivalent Level (CNEL) and the Day-Night Average Noise Level (Ldn). CNEL is a 24-hour weighted average measure of community noise. The computation of CNEL adds 5 dBA to the average hourly noise levels between 7 p.m. and 10 p.m. (evening hours), and 10 dBA to the average hourly noise levels between 10p.m. to 7 a.m. (nighttime hours). This weighting accounts for the increased human sensitivity to noise in the

evening and nighttime hours. Ldn is a very similar 24-hour weighted average which weighs only the nighttime hours and not the evening hours. CNEL is normally about 1 dB higher than Ldn for typical traffic and other community noise levels.

Groundborne Vibration

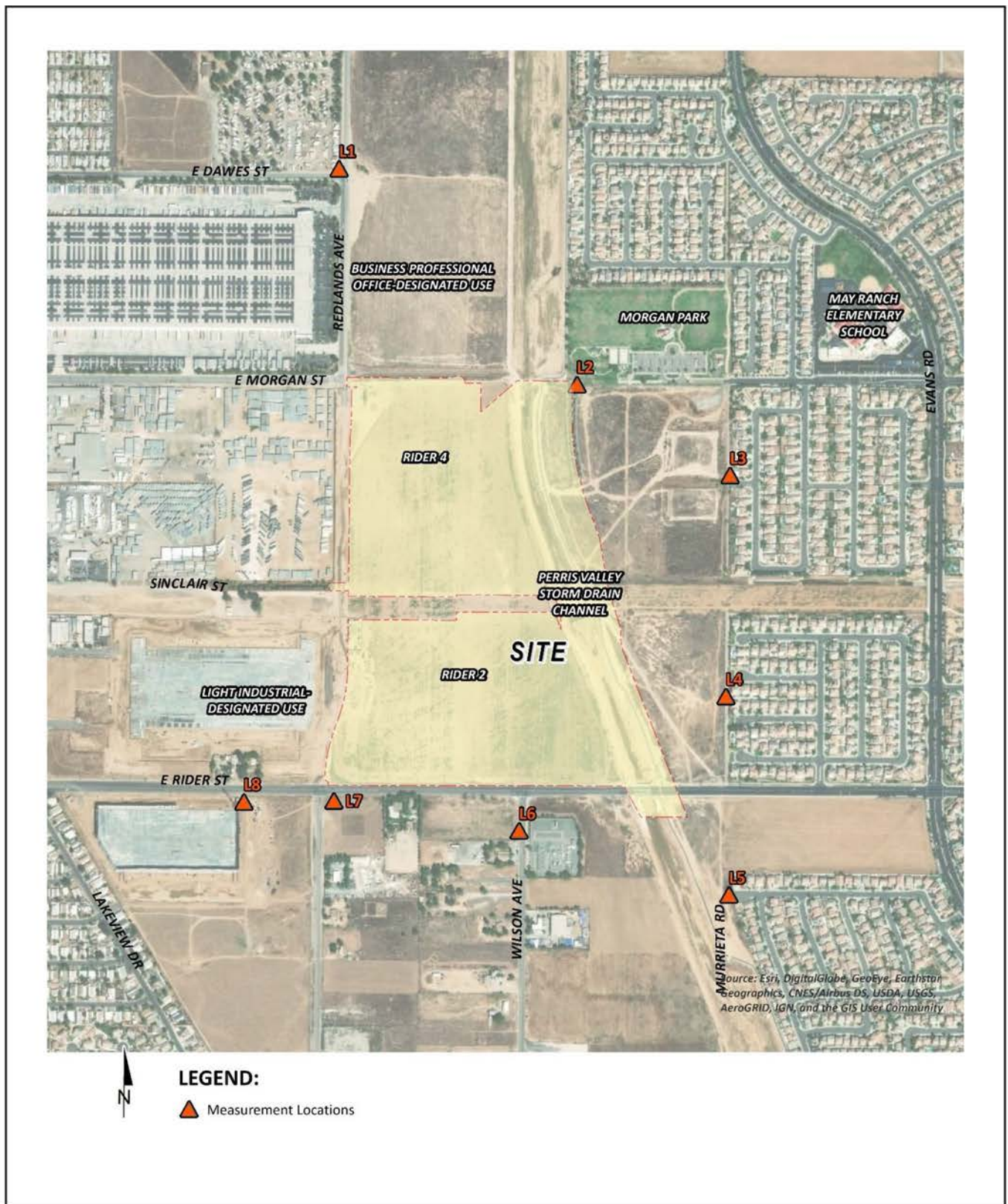
Operational and construction activities can result in varying degrees of ground-borne vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Construction vibration is generally associated with pile driving and rock blasting. Other construction equipment such as air compressors, light trucks, hydraulic loaders, etc., generates little or no ground vibration. Large bulldozers and loaded trucks can cause perceptible vibration levels proximate receptors. The United States Department of Transportation Federal Transit Administration (FTA) provides guidelines for maximum-acceptable vibration criteria for different types of land uses. These guidelines allow 78 Vibration Decibels (VdB) for residential uses and buildings where people normally sleep, and provide a substantiated basis for determining the relative significance of potential Project-related vibration impacts due to on-site operational and construction activities.

Existing Noise Levels

To assess the existing noise level environment, eight 24-hour noise level measurements were taken at potential receiver locations in the Project study area. The measurement locations were selected to describe and document the existing noise environment within the Project study area (ambient noise survey locations are shown in Figure 4.12-1, Noise Measurement Locations). To describe the existing noise conditions, noise level measurements were collected by Urban Crossroads, Inc. on Thursday, July 19th, 2018. Noise level measurements were taken using a Piccolo Type 2 integrating sound level meter and dataloggers and calibrated using a Larson-Davis calibrator, Model CAL 150 integrating sound level meter. The sound level meter was programmed to record noise levels in “slow” mode in A weighted form. The sound level meters and microphones were equipped with a windscreen during all measurements. The Leq, maximum noise level (L_{max}), and minimum noise level (L_{min}) values taken at each ambient noise measurement location are presented in Table 4.12-1, 24-Hour Ambient Noise Level Measurements.

As shown in Table 4.12-1, average daytime noise levels in the study area range from 53.9 to 67.7 dBA Leq, and average nighttime noise levels range from 44.9 to 63.7 dBA Leq. The background ambient noise levels in the Project study area are dominated by the transportation-related noise associated with the arterial roadway network (i.e., Redlands Avenue, Dawes Street, Morgan Street, Rider Street, and local residential roads). This includes the auto and heavy truck activities near the noise level measurement locations. Additional background noise sources in the Project study area include aircraft overflight noise from the March Air Reserve Base/Inland Port Airport (MARB/IPA). Based on Figure 4.9-6 of the PVCCSP EIR, Projected Noise Contours for March ARB, the Project area is partially within the 60 to 65 dBA CNEL noise contours.

Estimated existing traffic noise levels on roads that would be used by Project-generated traffic are shown in Table 4.12-2, Existing Without Project Conditions Noise Contours. Segments adjacent to sensitive receptors are identified in Table 4.9-B of the PVCCSP EIR, or were identified by on-site observation.



Source(s): Urban Crossroads (08-31-2020)

Figure 4.12-1



Noise Measurement Locations

Table 4.12-1 24-Hour Ambient Noise Level Measurements

Location ¹	Distance to Project Boundary (Feet)	Description	Energy Average Noise Level (dBA L _{eq}) ²		CNEL
			Daytime	Nighttime	
L1	1,346	Located north of the Project area on Redlands Avenue adjacent to an existing RV park and industrial use.	62.9	59.2	67.5
L2	30	Located east of the Project area at the southwest corner of Morgan Park.	53.9	44.9	55.2
L3	944	Located east of the Project area adjacent to existing residence west of Evans Road.	56.1	55.3	61.9
L4	509	Located east of the Project area adjacent to existing residence north of Rider Street.	55.9	48.6	57.7
L5	567	Located southeast of the Project area adjacent to residence on Parula Street.	55.6	48.0	56.9
L6	278	Located south of the Project area across Rider Street adjacent to a non-conforming existing residence.	63.7	59.0	66.9
L7	107	Located south of the Project area on the southeast corner of Redlands Avenue and Rider Street near non-conforming existing residences	67.7	63.4	71.4
L8	538	Located southwest of the Project area adjacent to Rider Street and the nearest non-conforming residences.	67.6	63.7	71.4

1. See Figure 4.12-1 for the noise level measurement locations.
2. The long-term 24-hour measurement printouts are included in Appendix 5.2 of the Project's Noise Analysis (Appendix K). "Daytime" = 7:01 a.m. to 10:00 p.m.; "Nighttime" = 10:01 p.m. to 7:00 a.m.
 Source: (Urban Crossroads, 2020a)

Table 4.12-2 Existing Without Project Conditions Noise Contours

ID	Road	Segment	Adjacent Existing Land Use	CNEL at Nearest Adjacent Land Use (dBA) ²	Distance to Contour from Centerline (Feet)		
					70 dBA CNEL	65 dBA CNEL	60 dBA CNEL
1	Perris Bl.	n/o Harley Knox Bl.	Commercial	76.7	180	388	835
2	Perris Bl.	s/o Harley Knox Bl.	Commercial	75.7	153	330	712
3	Perris Bl.	n/o Ramona Expwy.	Commercial	75.5	149	322	694
4	Perris Bl.	s/o Ramona Expwy.	Commercial	74.8	133	286	616
5	Perris Bl.	s/o Morgan St.	Light Industrial	75.0	139	298	643
6	Perris Bl.	s/o Rider St.	Light Industrial (Residential)	75.3	145	313	675
7	Redlands Av.	s/o Harley Knox Bl.	Light Industrial	68.5	RW	80	173
8	Redlands Av.	s/o Markham St.	Light Industrial	68.9	RW	86	185
9	Redlands Av.	s/o Ramona Expwy.	Commercial (Residential)	64.4	RW	RW	92
10	Redlands Av.	s/o Rider St.	Light Industrial (Residential)	67.5	RW	69	149
11	Harley Knox Bl.	e/o Western Wy.	Light Industrial	74.0	119	257	553
12	Harley Knox Bl.	e/o Patterson Av.	General Industrial	73.6	111	239	514
13	Harley Knox Bl.	e/o Webster Av.	General Industrial	73.3	106	229	493
14	Harley Knox Bl.	e/o Indian Av.	Light Industrial	72.2	90	194	418
15	Harley Knox Bl.	e/o Perris Bl.	Commercial (Non-Conforming Residential)	67.8	RW	99	214
16	Markham St.	w/o Redlands Av.	Light Industrial	58.8	RW	RW	RW
17	Ramona Expwy.	w/o Nevada Av.	Commercial	75.8	223	481	1035
18	Ramona Expwy.	e/o Nevada Av.	Commercial	75.5	212	458	986
19	Ramona Expwy.	e/o Webster Av.	Commercial/Light Industrial	75.0	199	428	922
20	Ramona Expwy.	e/o Indian Av.	Light Industrial	75.1	202	435	936
21	Ramona Expwy.	e/o Perris Bl.	Commercial (Residential)	74.6	188	404	871
22	Ramona Expwy.	w/o Redlands Av.	Commercial (Residential)	74.9	195	419	903
23	Ramona Expwy.	e/o Redlands Av.	Office	75.4	210	452	974
24	Morgan St.	e/o Perris Bl.	Light Industrial	62.8	RW	RW	73
25	Rider St.	e/o Perris Bl.	Light Industrial (Residential)	73.7	83	178	383
26	Rider St.	w/o Redlands Av.	Light Industrial (Residential)	73.7	83	178	384
27	Rider St.	e/o Redlands Av.	Light Industrial (Residential)	74.6	95	205	441

RW: Location of the respective noise contour falls within the right-of-way of the road.

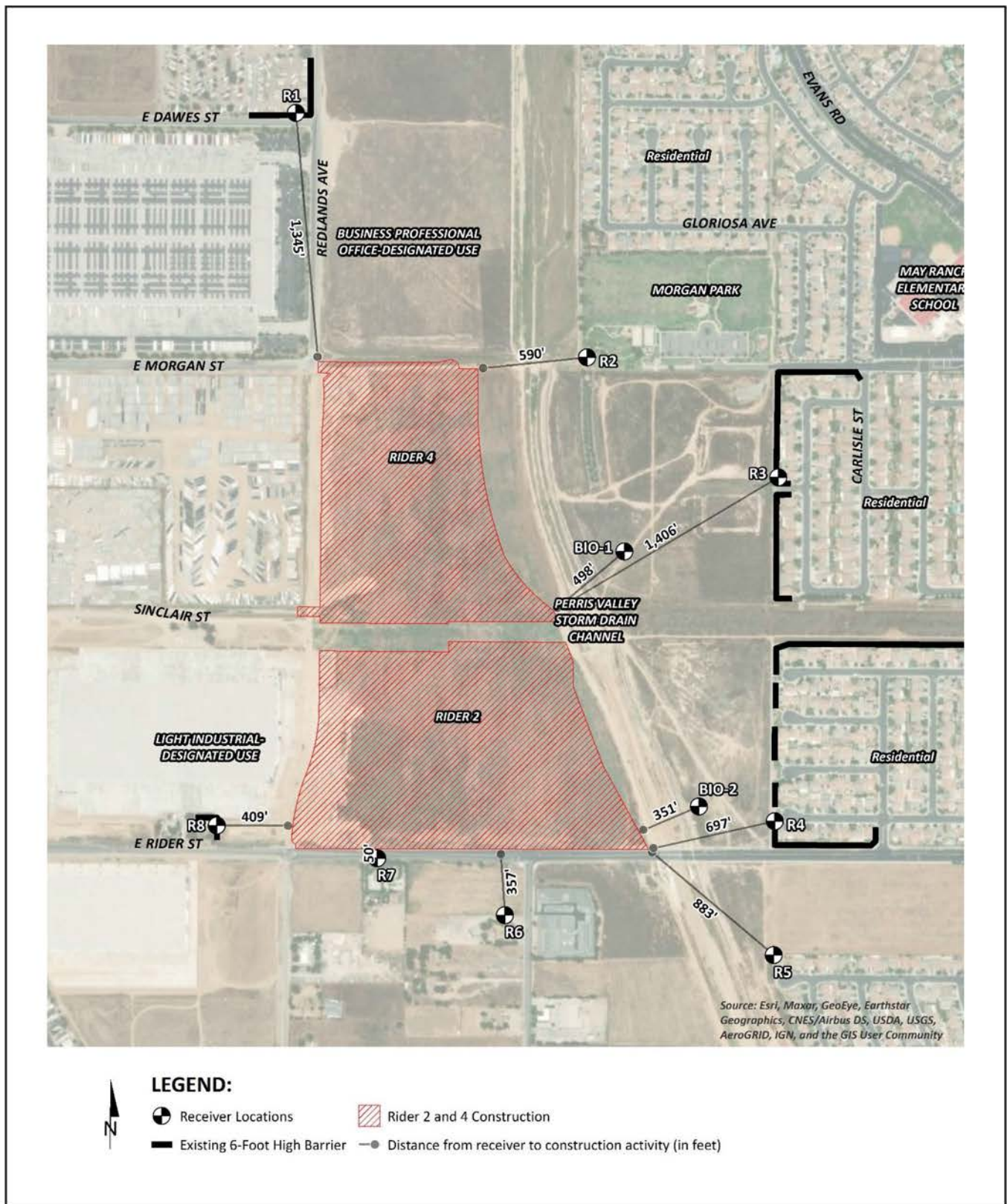
1. Based on PVCCSP Land Use Plan and Nearmap aerial imagery.

2. The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the nearest adjacent land use.

Source: (Urban Crossroads, 2020a)

Sensitive Receptors

To assess the potential for construction and long-term operational noise impacts, eight receiver locations, as shown on Figure 4.12-2, Rider 2 and Rider 4 Warehouse Construction Activities and Receiver Locations, Figure 4.12-3, PVSD Channel Improvements Construction Activities and Receiver Locations, and Figure 4.12-4, Receiver Locations, were identified as representative locations for analysis. As identified in the PVCCSP EIR, sensitive receptors are areas where humans are participating in activities that may be subject to the stress of significant interference from noise and often include residential dwellings, mobile homes, hotels, motels, hospitals, nursing homes, educational facilities, and libraries.

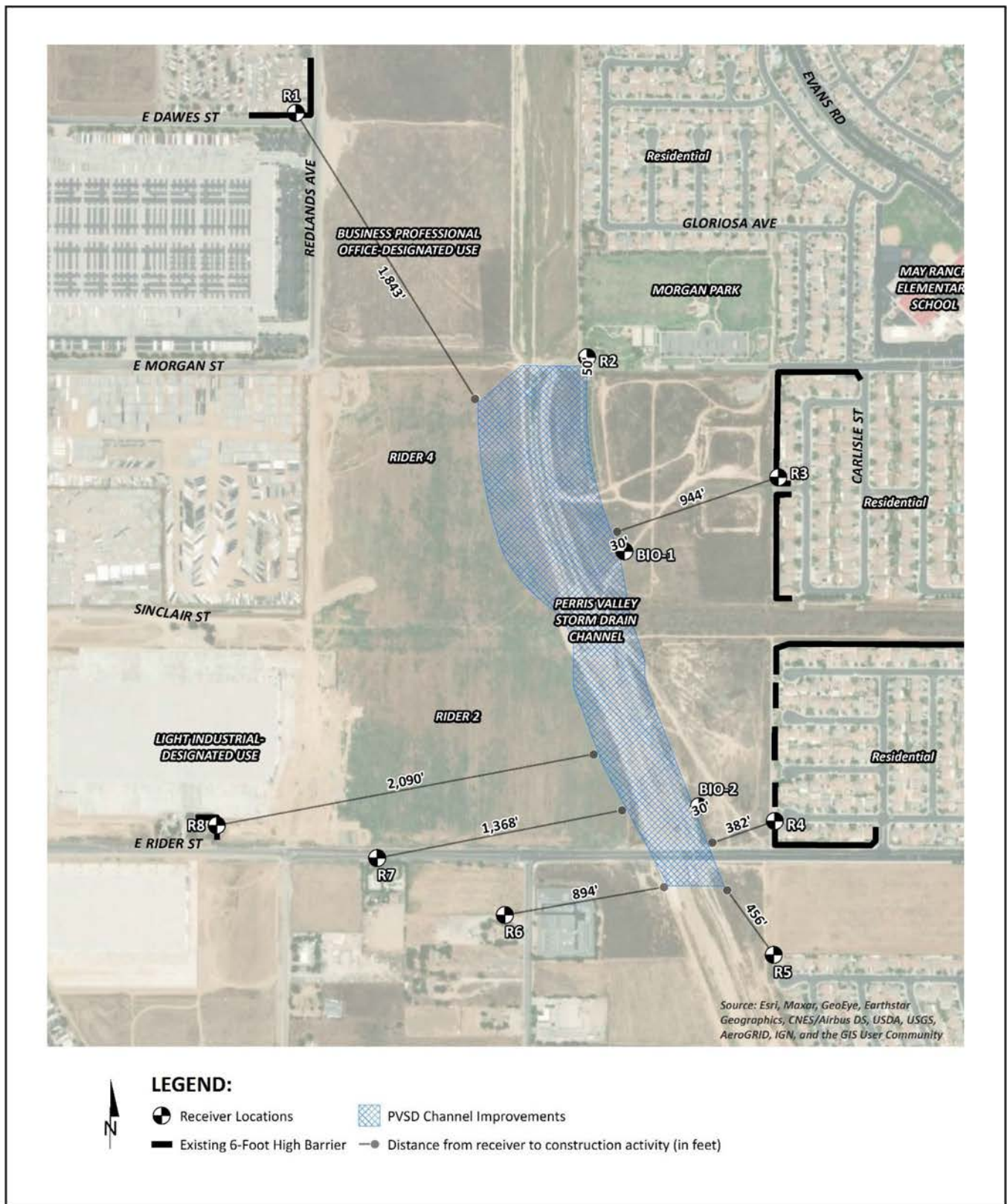


Source(s): Urban Crossroads (08-31-2020)

Figure 4.12-2



Rider 2 and Rider 4 Warehouse Construction Activities and Receiver Locations

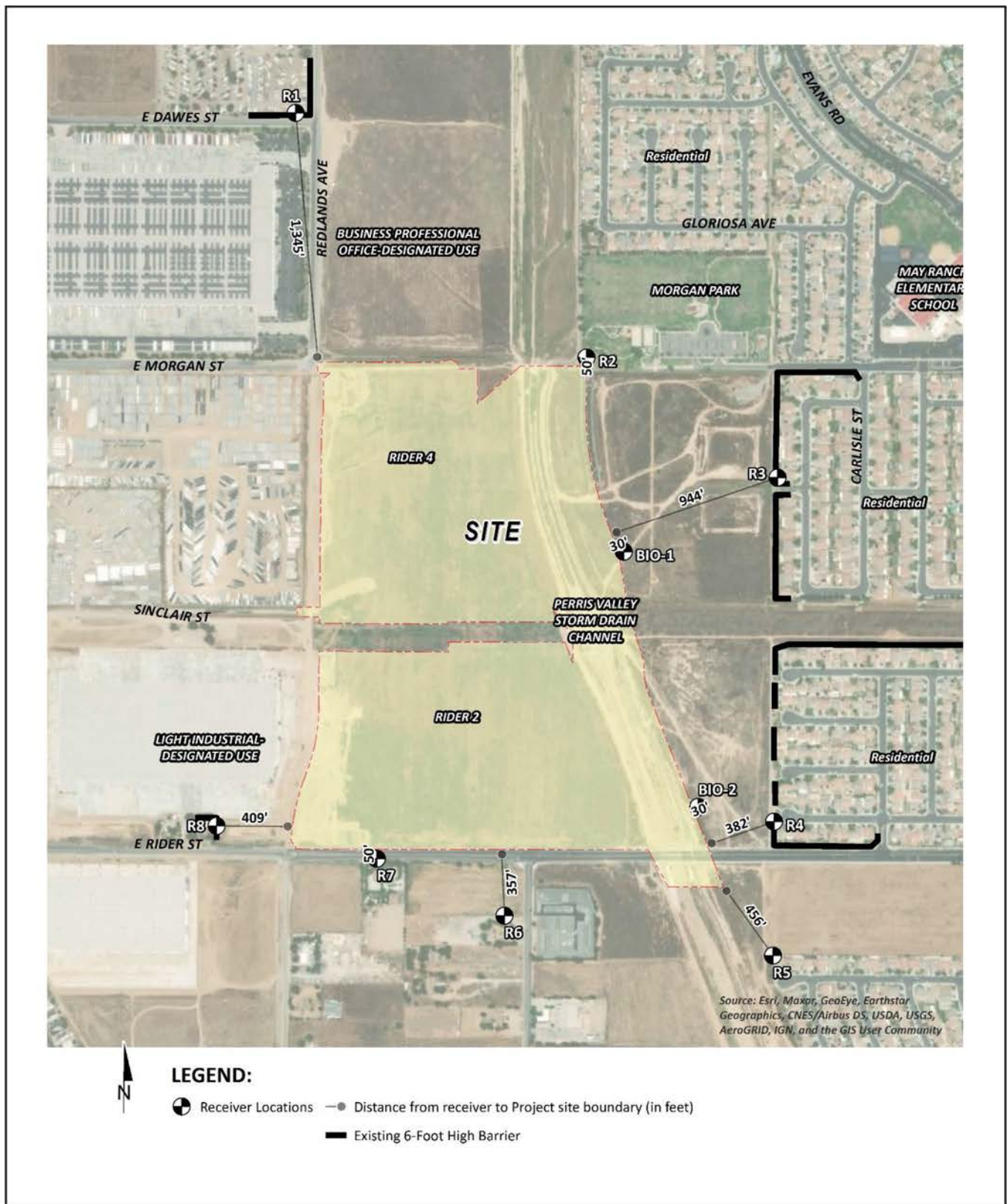


Source(s): Urban Crossroads (08-31-2020)

Figure 4.12-3



PVSD Channel Improvements Construction Activities and Receiver Locations



Source(s): Urban Crossroads (08-31-2020)

Figure 4.12-4



Receiver Locations

Other receptors include office and industrial buildings, which are not considered as sensitive as single-family homes, but are still protected by City of Perris land use compatibility standards, as discussed below. Representative sensitive receivers in the Project study area include single-family residences and Morgan Park, as described below. In addition, other receivers include an existing RV park, which is a transient commercial use and is not considered a sensitive land use, and receiver locations R3 and R4, which represent existing open space uses and potential sensitive receiver locations for purposes of analyzing impacts to biological resources, as further discussed in Section 4.4, Biological Resources, of this EIR. Sensitive land uses in the Project study area that are located at greater distances than receivers identified on Figure 4.12-4 would experience lower noise levels from Project-related construction or operational activities due to the additional attenuation from distance and the shielding of intervening structures. Distance is measured in a straight line from the project boundary to each receiver location.

- R1: Location R1 represents the existing Camper Resorts of America RV park located approximately 1,345 feet north of the Project area, which is a transient commercial use and is not considered a sensitive receiver. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.
- R2: Location R2 represents the existing park, Morgan Park, located approximately 50 feet northeast of the Project area (east of the PVSD Channel Improvement Project). A 24-hour noise measurement was taken near this location, L2, to describe the existing ambient noise environment.
- R3: Location R3 represents the existing single-family residential property line at 3502 Churchill lane located approximately 944 feet east of the Project area (east of the PVSD Channel Improvement Project). A 24-hour noise measurement was taken near this location, L3, to describe the existing ambient noise environment.
- R4: Location R4 represents the existing single-family residential property line at 805 Finnegan Way located approximately 382 feet east of the Project area (east of the PVSD Channel Improvement Project). A 24-hour noise measurement was taken near this location, L4, to describe the existing ambient noise environment.
- R5: Location R5 represents existing single-family residential property line located at 812 Parula Street approximately 456 feet southeast of the Project area. A 24-hour noise measurement was taken near this location, L5, to describe the existing ambient noise environment.
- R6: Location R6 represents existing non-conforming residential property line within light industrial-designated land use located approximately 357 feet south of the Project area. A 24-hour noise measurement was taken near this location, L6, to describe the existing ambient noise environment.
- R7: Location R7 represents existing non-conforming residential property line within light industrial-designated land use located approximately 50 feet south of the Project area. A 24-hour noise measurement was taken near this location, L7, to describe the existing ambient noise environment.
- R8: Location R8 represents existing non-conforming residential property line within light industrial-designated land use located approximately 409 feet west of the Project area. A 24-hour noise measurement was taken near this location, L8, to describe the existing ambient noise environment.
- BIO-1: Location BIO-1 represents open space located approximately 30 feet east of the Project area (east of the PVSD Channel Improvement Project).

BIO-2: Location BIO-2 represents open space located approximately 30 feet east of the Project area (east of the PVSD Channel Improvement Project).

4.12.2 EXISTING POLICIES AND REGULATIONS

Section 4.9, Noise, of the PVCCSP EIR includes discussions of noise regulations. Following is a discussion of applicable State and local regulations related to noise, which are further discussed in the Noise Analysis included in Appendix K of this EIR. There are no regional noise or vibration policies or regulations applicable to the Project with the exception of regulations related to the MARB/IP, which are addressed herein.

State

Noise Standards

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city adopt a General Plan that includes a Noise Element which is to be prepared according to guidelines adopted by the Governor's Office of Planning and Research (OPR). The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. The City of Perris has adopted a modified version of the State guidelines in its Noise Element, as discussed below.

Green Building Standards Code

The State of California's Green Building Standards Code contains mandatory measures for non-residential building construction in Section 5.507 on Environmental Comfort. These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when non-residential structures are developed in areas where the exterior noise levels exceed 65 dBA CNEL, such as within a noise contour of an airport, freeway, railroad, and other areas where noise contours are not readily available. If the development falls within an airport or freeway 65 dBA CNEL noise contour, the combined sound transmission class (STC) rating of the wall and roof-ceiling assemblies must be at least 50. For those developments in areas where noise contours are not readily available, and the noise level exceeds 65 dBA Leq for any hour of operation, a wall and roof-ceiling combined STC rating of 45, and exterior windows with a minimum STC rating of 40 are required (Section 5.507.4.1).

As further discussed below, the Project area is located outside of the 65 dBA CNEL noise level contour boundaries of the MARB/IPA. In addition, the Project area is located outside of the 65 dBA CNEL noise level contours of the I-215 Freeway. Therefore, no further analysis is provided in relation to the State of California's Green Building Standards Code requirements.

Local

City of Perris General Plan

The City of Perris has adopted a Noise Element of the General Plan to control and abate environmental noise, and to protect the citizens of Perris from excessive exposure to noise. The Noise Element specifies the maximum allowable unmitigated exterior noise levels for new developments impacted by transportation noise sources such as arterial roads, freeways, airports, and railroads. In addition, the

Noise Element identifies noise policies and implementation measures designed to protect, create, and maintain an environment free from noise that may jeopardize the health or welfare of sensitive receptors, or degrade quality of life. The specific goals and policies of the General Plan related to noise that are relevant to the Project and a discussion of the Project's consistency is provided in Table 4.11-2, City of Perris General Plan Consistency Analysis, in Section 4.11, Land Use and Planning, of this EIR.

The noise standards identified in the City of Perris General Plan are guidelines to evaluate the acceptability of the transportation related noise level impacts. These standards are based on the OPR and are used to assess the long-term traffic noise impacts on land uses. According to the City's Land Use Compatibility for Community Noise Exposure (Exhibit N-1), noise-sensitive land uses such as single-family residences are *normally acceptable* with exterior noise levels below 60 dBA CNEL and *conditionally acceptable* with noise levels below 65 dBA CNEL. Industrial uses, such as the Project, are considered *normally acceptable* with exterior noise levels of up to 70 dBA CNEL, and *conditionally acceptable* with exterior noise levels between 70 to 80 dBA CNEL.

Additionally, Policy V.A of the General Plan Noise Element, which addresses noise levels generated by industrial uses, is addressed under Threshold a of this section. Implementation Measure V.A.1 requires that new large-scale industrial facilities located within 160 feet of sensitive land uses identify specific measures necessary to ensure that noise levels to be generated in conjunction with operation of a proposed facility do not exceed 60 dBA CNEL at the property line of the adjoining sensitive land use.

City of Perris Noise Ordinance

To analyze noise impacts originating from a designated fixed location or private property, such as the Project, operational noise is typically evaluated against standards established under a City's Municipal Code. Chapter 7.34, Noise Control, of the City of Perris Municipal Code is the City's noise ordinance. The following sections from the noise ordinance are applicable to the Project:

Section 7.34.040 – Sound Amplification

No person shall amplify sound using sound amplifying equipment contrary to any of the following:

- The only amplified sound permitted shall be either music, the human voice, or both.
- The volume of amplified sound shall not exceed the noise levels set forth in this subsection when measured outdoors at or beyond the property line of the property from which the sound emanates (see Table 4.12-3).

Table 4.12-3 Noise Ordinance Property Line Sound Level Noise Limits

Time Period	Maximum Noise Level
Nighttime: 10:01 PM–7:00 AM	60 dBA
Daytime: 7:01 AM–10:00 PM	80 dBA
dBA: A-weighted decibel	

Source: (Urban Crossroads, 2020a)

Section 7.34.050 – General Prohibition

- It unlawful for any person to willfully make, cause or suffer, or permit to be made or caused, any loud excessive or offensive noises or sounds which unreasonably disturb the peace and quiet of

any residential neighborhood or which are physically annoying to persons of ordinary sensitivity or which are so harsh, prolonged or unnatural or unusual in their use, time or place as to occasion physical discomfort to the inhabitants of the city, or any section thereof. The standards for dBA noise level in Section 7.34.040 shall apply to this section. To the extent that the noise created causes the noise level at the property line to exceed the ambient noise level by more than 1.0 decibel, it shall be presumed that the noise being created also is in violation of this section.

- The characteristics and conditions which should be considered in determining whether a violation of the provisions of this section exists should include, but not be limited to, the following:
 - The level of the noise.
 - Whether the nature of the noise is usual or unusual.
 - Whether the origin of the noise is natural or unnatural.
 - The level of the ambient noise.
 - The proximity of the noise to sleeping facilities.
 - The nature and zoning of the area from which the noise emanates and the area where it is received.
 - The time of day or night the noise occurs.
 - The duration of the noise.
 - Whether the noise is recurrent, intermittent, or constant.

Section 7.34.060 – Construction Noise

The City of Perris Municipal Code, Section 7.34.060, identifies the City's construction noise standards and permitted hours of construction activity. Pursuant to Section 7.34.060, it is unlawful for any person between the hours of 7:00 PM of any day and 7:00 AM of the following day, or on a legal holiday, with the exception of Columbus Day and Washington's birthday, or on Sundays to erect, construct, demolish, excavate, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise. Further, Section 7.34.060 identifies that a noise level standard of 80 dBA L_{max} at residential properties shall apply to the noise-sensitive receiver locations located in the City of Perris.

March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (ALUCP)

The *March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan* (MARB/IP ALUCP) includes the policies for determining the land use compatibility of the Project, although it is located further than 2 miles of an airport runway. The MARB/IP ALUCP, Map MA-1, indicates that the Project area is located within Compatibility Zones C-1 and D, and the Table MA-1 Compatibility Zone Factors indicates that this area is considered to have a moderate to low noise impact, and is mostly within the 55 dBA CNEL contour with a portion of the southwestern part of the Rider 2 site within 60 dBA CNEL contour (refer to Exhibit 3-A of the Noise Analysis). Further, the Basic Compatibility Criteria, listed in Table MA-2 of the MARB/IPA LUCP identifies no prohibited uses other than those that would pose a safety risk due to building height. The MARB/IPA LUCP does not identify industrial-use specific noise compatibility standards, and therefore, the OPR Land Use Compatibility for Community Noise Exposure, previously discussed, is used to assess potential aircraft-related noise levels within the Project area. The OPR guidelines indicate that

industrial uses, such as the Project, are considered *normally acceptable* with exterior noise levels of up to 70 dBA CNEL.

4.12.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a Project would normally have a significant adverse environmental impact related to noise if it would:

- a. Result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- b. Result in the generation of excessive groundborne vibration or groundborne noise levels.
- c. For a project located within the vicinity of a private airship 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, expose people residing or working in the project area to excessive noise levels.

4.12.4 ENVIRONMENTAL IMPACTS

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to noise. These Standards and Guidelines (summarized below) are incorporated as part of the Project (i.e., the warehouse component) and are assumed in the analysis presented in this section. The chapters/section numbers provided correspond to the PVCCSP chapters/sections. The PVCCSP EIR includes MMs for potential impacts to noise, which are listed below.

Airport Overlay Zone (Chapter 12.0 of PVCCSP)

12.1.3 Compatibility with March ARB/IP ALUCP.

The PVCCSP is located in March ARB/IP safety zones and therefore all development shall comply with the following measures:

- **Noise Standard:** All building office areas shall be constructed with appropriate sound mitigation measures as determined by an acoustical engineer or architect to ensure appropriate interior sound levels.
- **Notice of Airport in the Vicinity:** Prior to approval of new development projects, all applicants shall prepare an aerial photograph identifying the location of the March ARB/IP in relationship to the project site, and a Notice of Airport in the Vicinity. Because the entire PVCCSP lies within the MARB Airport Influence Area (AIA), notice must be provided to all potential purchasers or tenants (refer to mitigation measure MM Haz 4 in Section 4.9, Hazards and Hazardous Materials, of this EIR).

The following mitigation measures from the PVCCSP EIR for noise impacts are incorporated as part of the Project and are assumed in the analysis presented in this subsection.

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

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

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

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

Thresholds of Significance

Noise level increases at nearby receiver locations resulting from the Project are evaluated based on the PVCCSP EIR thresholds of significance described below at nearby sensitive receiver locations. Further, CEQA requires that consideration be given to the magnitude of the increase, the existing ambient noise levels, and the location of noise-sensitive receivers to determine if a noise increase represents a significant adverse environmental impact. This approach recognizes that there is no single noise increase that renders the noise impact significant.

According to the PVCCSP EIR, there is no official "industry standard" of determining significance of noise impacts. However, typically, a jurisdiction will identify either 3 dBA or 5 dBA increase as being the threshold because these levels represent varying levels of perceived noise increases. The PVCCSP EIR indicates that a 5 dBA noise level increase is considered discernable to most people in an exterior environment when the existing noise levels are below 60 dBA. Further, it identifies a 3 dBA increase threshold when the existing ambient noise levels already exceed 60 dBA. In addition, according to the PVCCSP EIR, an increase of 5 dBA or more above without Project noise levels is considered a significant impact at all other sensitive land uses.

Noise impacts shall be considered significant if any of the following occur as a direct result of the proposed development.

Off-Site Traffic Noise

To assess the off-site transportation CNEL noise level impacts associated with the Project, 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 following PVCC SP EIR significance criteria:

- When the resulting noise levels at noise-sensitive land uses (e.g. residential, etc.):
 - are less than 60 dBA CNEL and the Project creates a 5 dBA CNEL or greater Project-related noise level increase; or

- exceed 60 dBA CNEL and the Project creates a 3 dBA CNEL or greater Project-related noise level increase.

Operational Noise

To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against the stationary source City of Perris L_{max} exterior noise level standards in the Municipal Code and the 24-hour CNEL noise level criteria for new industrial facilities identified in City of Perris General Plan Noise Element.

- If Project-related operational noise levels
 - exceed the 80 dBA L_{max} daytime or 60 dBA L_{max} nighttime noise level standards at the nearby sensitive receiver locations in the City of Perris (City of Perris Municipal Code, Section 7.34.040); or
 - exceed the 60 dBA CNEL exterior noise level standard at residential receiver locations within 160 feet of the Project area, in the City of Perris (City of Perris General Plan Noise Element, Implementation Measure V.A.1).
- If the resulting ambient noise levels at the nearby noise-sensitive receivers near the Project area:
 - are less than 60 dBA L_{eq} and the Project creates a 5 dBA L_{eq} or greater Project-related noise level increase; or
 - exceed 60 dBA L_{eq} and the Project creates a 3 dBA L_{eq} or greater Project-related noise level increase (PVCCSP EIR, Page 4.9-20).
- If long-term project generated operational source vibration levels could exceed the FTA maximum acceptable vibration standard of 78 VdB at noise-sensitive receiver locations.

Construction Noise and Vibration

Noise from construction activities are typically evaluated against standards established under a City's Municipal Code. In addition, since the City of Perris has not identified or adopted specific vibration level standards guidelines for maximum-acceptable vibration criteria for different types of land uses were derived from the United States Department of Transportation Federal Transit Administration (FTA).

- If Project-related construction activities create noise levels at sensitive receiver locations in the City of Perris which exceed the construction noise level limit of 80 dBA L_{max} (City of Perris Municipal Code 7.34.060).
- If short-term project generated construction source vibration levels could exceed the FTA maximum acceptable vibration standard of 78 VdB at noise-sensitive receiver locations.

Impact Analysis

Threshold a Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Consistent with the analysis presented in the PVCCSP EIR, the Project has the potential to result in a substantial temporary or permanent increase in ambient noise levels during construction of the Project, during long-term site operations, and due to Project-related traffic. Each is discussed below.

Construction-Related Noise Impacts

The PVCCSP EIR concludes that construction-generated noise resulting from implementation of the PVCCSP and its subsequent implementing development and infrastructure projects could result in potentially significant impacts, but concluded that compliance with the day and hour limits of the Municipal Code (Noise Ordinance) and incorporation of mitigation measures MM Noise 1 through MM Noise 4 would reduce impacts to less than significant levels. The PVCCSP EIR further concludes that the transport of workers and equipment to and from the Project area would incrementally increase noise on access roads leading to the site. Although there would be relatively high intermittent noise from passing vehicles, the noise increase would be minor when averaged over longer periods of time. In addition, truck traffic on public roads is exempt from local regulations. Therefore, short-term construction noise associated with worker commutes and equipment transport would be less than significant.

Noise generated by the Project construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that when operating at the Project area boundaries closest the nearest receiver locations can reach high levels. The number and mix of construction equipment are expected to occur in stages as described in Section 3.6.3, Construction Activities, of this EIR. It should be noted that staging of the Rider Street bridge construction (whether the bridge is built in one or two stages) only changes the duration of the potential noise level impacts and does not affect the Project construction noise levels at the nearest receiver locations. Further, the Project does not require pile driving. Noise levels generated by heavy construction equipment can range from approximately 68 dBA to in excess of 80 dBA L_{max} when measured at 50 feet. However, these noise levels diminish with distance from the construction site at a rate of 6 dBA per doubling of distance. For example, a noise level of 85 dBA L_{max} measured at 50 feet from the noise source to the receiver would be reduced to 79 dBA L_{max} at 100 feet from the source to the receiver, and would be further reduced to 73 dBA L_{max} at 200 feet from the source to the receiver.

The construction noise analysis was prepared using reference construction equipment noise levels from the Federal Highway Administration (FHWA) published Roadway Construction Noise Model (RCNM), which includes a national database of construction equipment reference noise emission levels. The RCNM equipment database provides a comprehensive list of the noise generating characteristics for specific types of construction equipment including reference L_{max} noise levels measured at 50 feet. Table 10-1 and Table 10-2 of the Project's Noise Analysis (Appendix K) provide a summary of the construction reference noise levels for the Rider 2 and Rider 4 buildings and the PVSD Channel improvement including the Rider Street bridge construction), respectively.

Using the reference RCNM L_{max} construction equipment noise levels, calculations of the Project construction noise level impacts at the nearest receiver locations were completed. Tables 10-3 and Table 10-4 of the Project’s Noise Analysis (Appendix K) provide a summary of the noise levels by construction stage at the nearest receiver locations. The noise analysis shows that the Project construction activities are expected to range from 52.6 to 85.0 dBA L_{max} at the nearest receiver locations (refer to Figure 4.12-2, Rider 2 and Rider 4 Warehouse Construction Activities and Receiver Locations).

The construction noise analysis shows that the highest construction noise levels would occur when equipment is operating at the closest point from the edge of the Project construction boundary to each of the nearest receiver locations. As shown on Table 4.12-4, Construction Noise Level Compliance, the highest unmitigated construction noise levels are expected to range from 52.6 to 85.0 dBA L_{max} . The construction noise analysis shows that receiver locations R2 and R7 would exceed the City of Perris Municipal Code 80 dBA L_{max} significance threshold for construction activity. Therefore, the unmitigated noise impact due to Project construction activities is considered potentially significant. All other receiver locations would experience less than significant construction noise levels.

Located 50 feet northeast of the PVSD Channel Improvement area, receiver location R2 represents Morgan Park. Receiver location R7 describes the residential property line at 475 E Rider Street located 50 feet south of the Rider 2 construction boundary. While the analysis shows that receiver locations R2 and R7 would exceed the City of Perris 80 dBA L_{max} construction significance threshold, neither R2 or R7 represent private outdoor living areas or areas of frequent human use. However, since receiver locations R2 and R7 would experience potentially significant construction noise level impacts, temporary construction noise mitigation measure is required.

Table 4.12-4 Construction Noise Level Compliance

Receiver Location ¹	Highest Construction Noise Levels (dBA L_{max})			
	Rider 2 and 4 Warehouse	PVSD Channel Improvements	Threshold ³	Threshold Exceeded? ⁴
R1	56.4	53.7	80	No
R2	63.6	85.0	80	Yes
R3	56.0	59.5	80	No
R4	62.1	67.3	80	No
R5	60.1	65.8	80	No
R6	67.9	60.0	80	No
R7	85.0	56.3	80	Yes
R8	66.7	52.6	80	No
BIO-1	65.0	89.4	-.5	-.5
BIO-2	68.1	89.4	-.5	-.5

¹ Noise receiver locations are shown on Exhibits 4.12-2 and 4.12-3.

² Highest construction noise level calculations based on distance from the construction noise source activity to the nearest receiver locations as shown on Table 10-3 and 10-4 of the Noise Analysis included in Appendix K of this EIR.

³ Construction noise level thresholds as discussed previously.

⁴ Do the estimated Project construction noise levels exceed the construction noise level threshold?

⁵ Receiver location and Project construction noise levels provided for informational purposes. Potential impacts to biological resources are addressed in Section 4.4 of this EIR. (Urban Crossroads, 2020a)

Mitigation measure MM 12-1 requires a minimum 100-foot buffer zone separating large construction equipment (e.g. dozers, graders, scrapers, etc.) from receiver locations R2 and R7. Using the drop-off

rate of 6 dBA per doubling of distance, the highest construction equipment reference noise level noise levels associated with large construction equipment of 85 dBA L_{max} at 50 feet would be reduced to 79 dBA L_{max} at 100 feet. With the required minimum 100-foot buffer zone separating large construction equipment (e.g. dozers, graders, scrapers, etc.) from receiver locations R2 and R7, the Project construction noise levels would satisfy the City of Perris 80 dBA L_{max} construction noise level threshold. Therefore, the Project construction noise levels are considered less than significant with mitigation.

Operational-Related Noise Impacts

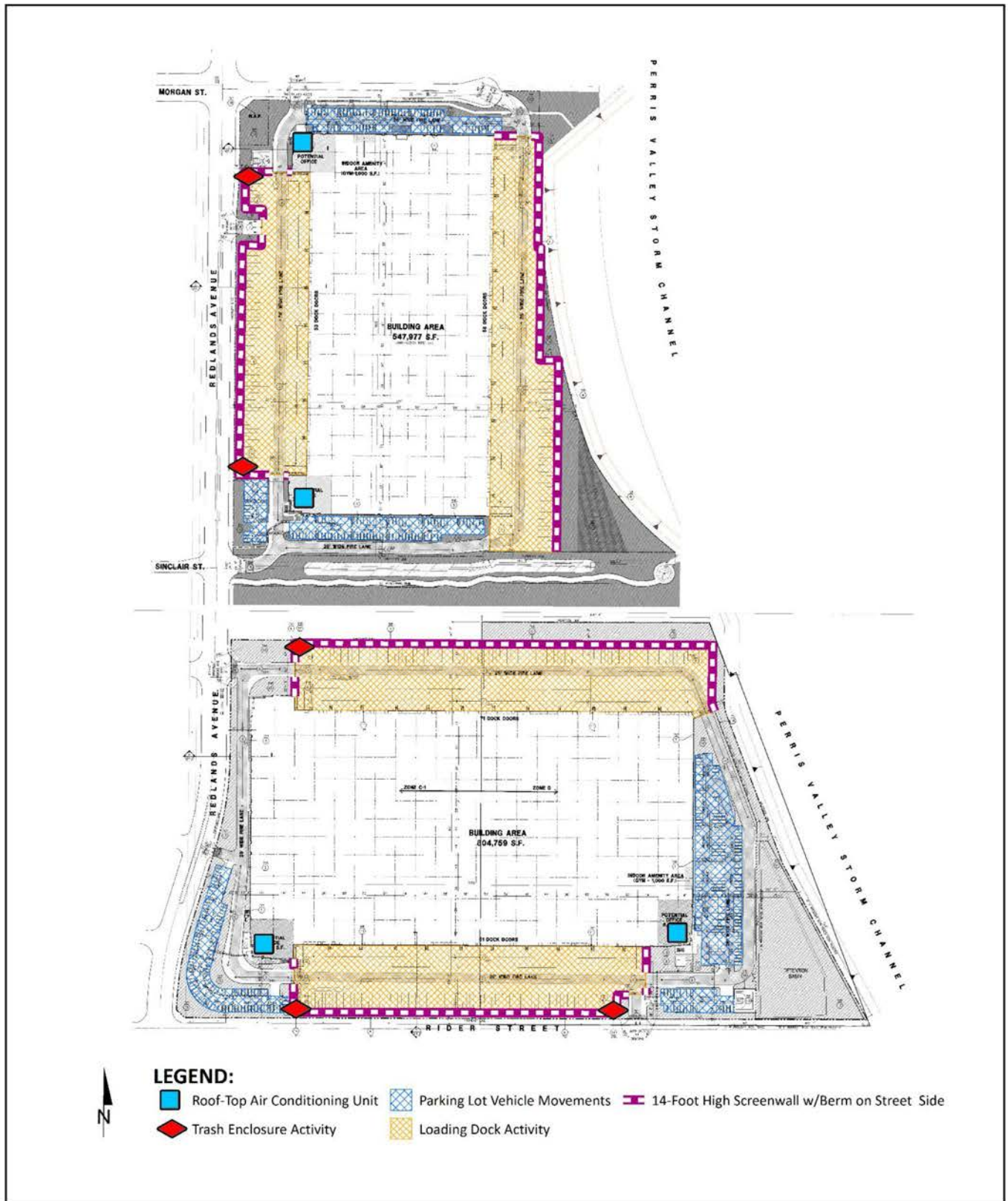
Project Operational Noise Levels

To present the potential worst-case noise conditions, this analysis assumes the Project would be operational 24 hours per day, seven days per week. The Project business operations would primarily be conducted within the enclosed buildings, except for traffic movement, parking, as well as loading and unloading of trucks at designated loading bays. The on-site Project-related noise sources are expected to include: loading dock activity, roof-top air conditioning units, parking lot vehicle movements, and trash enclosure activity, which are further described in Section 9.2 of the Noise Analysis included in Appendix K of this EIR. Figure 4.12-5, Operational Noise Source Locations, identifies the noise source locations used to assess the operational noise levels. The operational noise analysis includes the planned 14-foot-high screen wall on the perimeter of the truck trailer parking areas for each building. The screen wall locations are designed for screening, privacy, noise control, and security with berms.

The Project's operational noise levels were estimated based on reference noise level measurements of similar operational activities associated with these noise sources. The reference noise level measurements collected by Urban Crossroads from existing similar operational noise sources are shown on Table 9-1 of the Project's Noise Analysis (Appendix K of this EIR). Refer to Noise Analysis Section 9.2 for a discussion of the reference noise level measurements and inputs.

Using the reference noise levels to represent the proposed warehouse operations, operational source noise levels that are expected to be generated within the Project area and the Project-related noise level increases that would be experienced at each of the receiver locations were calculated. Table 9-2 of the Project's Noise Analysis included in Appendix K shows the Project operational noise levels during the daytime hours of 7:01 a.m. to 10:00 p.m., and Table 9-3 shows the Project operational noise levels during the nighttime hours of 10:01 p.m. to 7:00 a.m. As shown in these tables, there are minor differences between the daytime and nighttime noise levels, which is largely related to the duration of noise activity by the individual noise source activity (as shown in Table 9-1 of the Project's Noise Analysis). While the individual noise source levels vary between the daytime and nighttime operational noise levels, the loading dock activity noise source levels effectively overshadows the other noise source activity. This effectively produces the same daytime and nighttime noise levels, which are expected to range from 44.5 to 59.9 dBA L_{max} .

To demonstrate compliance with local noise regulations, the Project-only operational noise levels are evaluated against exterior noise level thresholds based on the City of Perris L_{max} exterior noise level standards at the receiver locations. Table 4.12-5, Operational Noise Level Compliance, shows the operational noise levels associated with the Project would satisfy the City of Perris operational noise level standards at all the nearest receiver locations. Therefore, the operational noise impacts are considered less than significant.



Source(s): Urban Crossroads (08-31-2020)

Figure 4.12-5



Operational Noise Source Locations

Table 4.12-5 Operational Noise Level Compliance (L_{max})

Receiver Location ¹	Project Operational Noise Levels (dBA L _{max}) ²		Exterior Noise Level Standards (dBA L _{max}) ³		Noise Level Standards Exceeded? ⁴	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	44.5	44.5	80	60	No	No
R2	53.7	53.7	80	60	No	No
R3	47.6	47.6	80	60	No	No
R4	52.9	52.9	80	60	No	No
R5	49.5	49.5	80	60	No	No
R6	55.7	55.7	80	60	No	No
R7	59.9	59.9	80	60	No	No
R8	44.5	44.5	80	60	No	No
BIO-1	57.9	57.9	.5	.5	.5	.5
BIO-2	55.4	55.4	.5	.5	.5	.5

¹ See Figure 4.12-4 for the receiver locations.

² Project operational noise levels as shown on Tables 9-2 and 9-3.

³ Exterior noise level standard described previously.

⁴ Do the estimated Project operational noise source activities exceed the noise level standards?

⁵ Receiver location for biological resources and Project operational noise levels provided for informational purposes.

Daytime = 7:01 a.m. to 10:00 p.m.; Nighttime = 10:01 p.m. to 7:00 a.m.

Source: (Urban Crossroads, 2020a)

Consistent with the City of Perris General Plan Noise Element, Implementation Measure V.A.1, Project operational noise levels at nearby sensitive receiver locations cannot exceed 60 dBA CNEL. The CNEL metric is typically used to describe 24-hour transportation-related noise levels; however, the City of Perris General Plan Noise Element requires new industrial land use such as the Project to demonstrate compliance at any noise-sensitive land use within 160 feet of the Project area. Table 4.12-6, Operational Noise Level Compliance, includes the evening and nighttime adjustments made to the operational noise levels during the applicable hours to convert the worst-case hourly operational noise levels (Leq) to 24-hour CNELs. Table 4.12-6 indicates that the 24-hour noise levels associated with the Project at the nearby receiver locations are expected to range from 42.8 to 58.3 dBA CNEL. The Project-related operational noise levels shown on Table 4.12-6 would satisfy the City of Perris 60 dBA CNEL exterior noise level standards at the nearby sensitive receiver locations; therefore, Project-related noise during long-term operations would be less than significant.

Project Operational Noise Increases

To describe the Project operational noise level contributions, the Project operational noise levels are combined with the existing ambient noise levels measurements for the nearby receiver locations potentially impacted by Project operational noise sources. Refer to Section 9.6 of the Project’s Noise Analysis (Appendix K of this EIR) for a description of how Project-related noise level contributions were calculated. Noise levels that would be experienced at receiver locations when Project-source noise is added to the ambient daytime and nighttime conditions are presented on Table 4.12-7, *Project Daytime Noise Level Contributions*, and Table 4.12-8, *Project Nighttime Noise Level Contributions*.

Table 4.12-6 Operational Noise Level Compliance (CNEL)

Receiver Location ¹	Project Operational Noise Levels			Exterior Noise Level Standards (CNEL) ³	Noise Level Standards Exceeded? ⁴
	Daytime (dBA L _{eq})	Nighttime (dBA L _{eq})	24-Hour (CNEL)		
R1	36.2	36.2	42.8	60	No
R2	45.4	45.4	52.1	60	No
R3	39.2	39.2	45.9	60	No
R4	44.6	44.6	51.3	60	No
R5	41.1	41.1	47.8	60	No
R6	47.3	47.3	54.0	60	No
R7	51.6	51.6	58.3	60	No
R8	36.1	36.1	42.8	60	No
BIO1	49.5	49.5	56.2	-.5	-.5
BIO-2	47.0	47.0	53.7	-.5	-.5

¹ See Exhibit 4.12-4 for the receiver locations.

² Project operational noise level calculations are included in Appendix 9.1 of the Noise Analysis is Appendix K.

³ City of Perris General Plan Noise Element Implementation Measure V.A.1

⁴ Do the estimated Project operational noise source activities exceed the noise level standards?

⁵ Biological resource receiver location and Project operational noise levels provided for informational purposes.

"Daytime = 7:01 a.m. to 10:00 p.m.; Nighttime = 10:01 p.m. to 7:00 a.m.

Source: (Urban Crossroads, 2020a)

Table 4.12-7 Project Daytime Noise Level Contributions (DBA LEQ)

Receiver Location ¹	Total Project Operational Noise Level ²	Measurement Location ³	Reference Ambient Noise Levels ⁴	Combined Project and Ambient ⁵	Project Increase ⁶	Increase Criteria ⁷	Increase Criteria Exceeded?
R1	36.2	L1	62.9	62.9	0.0	3.0	No
R2	45.4	L2	53.9	54.5	0.6	5.0	No
R3	39.2	L3	56.1	56.2	0.1	5.0	No
R4	44.6	L4	55.9	56.2	0.3	5.0	No
R5	41.1	L5	55.6	55.8	0.2	5.0	No
R6	47.3	L6	63.7	63.8	0.1	3.0	No
R7	51.6	L7	67.7	67.8	0.1	3.0	No
R8	36.1	L8	67.6	67.6	0.0	3.0	No

¹ See Figure 4.12-4 for the receiver locations.

² Total Project daytime operational noise levels as shown on Table 9-2 of the Noise Analysis in Appendix K of this EIR.

³ Reference noise level measurement locations as shown on Figure 4.12-1.

⁴ Observed daytime ambient noise levels as shown on Table 4.12-1.

⁵ Represents the combined ambient conditions plus the Project activities.

⁶ The noise level increase expected with the addition of the Project activities.

⁷ Significance increase criteria as described above.

(Urban Crossroads, 2020a)

Table 4.12-8 Project Nighttime Noise Level Contributions (DBA LEQ)

Receiver Location ¹	Total Project Operational Noise Level ²	Measurement Location ³	Reference Ambient Noise Levels ⁴	Combined Project and Ambient ⁵	Project Increase ⁶	Increase Criteria ⁷	Increase Criteria Exceeded?
R1	36.2	L1	59.2	59.2	0.0	5.0	No
R2	45.4	L2	44.9	48.2	3.3	5.0	No
R3	39.2	L3	55.3	55.4	0.1	5.0	No
R4	44.6	L4	48.6	50.1	1.5	5.0	No
R5	41.1	L5	48.0	48.8	0.8	5.0	No
R6	47.3	L6	59.0	59.3	0.3	5.0	No
R7	49.5	L7	63.4	63.6	0.2	3.0	No
R8	47.0	L8	63.7	63.8	0.1	3.0	No

1. See Figure 4.12-4 for the receiver locations.
2. Total Project nighttime operational noise levels as shown on Table 4.12-5.
3. Reference noise level measurement locations as shown on Figure 4.12-1.
4. Observed nighttime ambient noise levels as shown on Table 4.12-1.
5. Represents the combined ambient conditions plus the Project activities.
6. The noise level increase expected with the addition of the Project activities.
7. Significance Criteria as defined herein.
(Urban Crossroads, 2020a)

As indicated on Table 4.12-7 and Table 4.12-8, the Project would contribute a daytime operational noise level increase of up to 0.6 dBA Leq and a nighttime operational noise level increase of up to 3.3 dBA Leq at the receiver locations. Because the Project-related operational noise level contributions would not exceed the significance criteria of 5 dBA when the without Project noise levels are below 60 dBA CNEL or 3 dBA when the without Project noise levels exceed 60 dBA CNEL, the increases at the sensitive receiver locations are considered less than significant.

Traffic-Related Noise Impacts

Under existing conditions, it is expected that Project truck traffic would utilize the interchange of Harley Knox Boulevard at the I-215. However, Caltrans plans to construct an interchange with I-215 at Placentia Avenue. Once constructed (estimated to be complete in 2021), it is expected that Project traffic would also utilize the new interchange to access I-215. Accordingly, the analysis herein evaluates traffic-related noise impacts that could result from the Project both prior to and following construction of the new interchange at Placentia Avenue. To provide a conservative analysis, the analyses for each scenario assumes that all truck traffic would use either the Harley Knox Boulevard or Placentia Avenue interchanges with I-215. However, it is anticipated that ultimately trucks would use both interchanges, which would generate reduced noise levels compared to what is presented in this analysis.

The expected roadway noise level increases from vehicular traffic were calculated using a computer program that replicates the Federal Highway Administration (FHWA) Traffic Noise Prediction Model FHWA-RD-77-108, as further described in the Noise Analysis included in Appendix K of this EIR. Table 6-1 of the Noise Analysis and Table B of the Focused Off-site Noise Analysis present the roadway parameters used to assess the Project’s off-site transportation noise impacts. The estimated Project trip generation is presented in Section 4.12, Transportation, of this EIR. To quantify the off-site noise levels, the Project-generated truck trips were added to the heavy truck category in the FHWA noise prediction

model. The addition of the Project-generated truck trips increases the percentage of heavy trucks in the vehicle mix. This approach recognizes that the FHWA noise prediction model is significantly influenced by the number of heavy trucks in the vehicle mix. The estimated vehicle mix with the Project is presented in Table 6-5 of the Noise Analysis and Table F of the Focused Off-site Noise Analysis.

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 discussed previously. 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, and 60 dBA noise levels. The noise contours do not consider the effect of any existing noise barriers or topography that may attenuate ambient noise levels. In addition, because the noise contours reflect modeling of vehicular noise on area roadways, they appropriately do not reflect noise contributions from the surrounding stationary noise sources. Table 4.12-9 identifies the estimated exterior traffic noise levels, without barrier attenuation, for the 27 study area roadway segments under Existing and Existing with Project conditions with use of the Harley Knox interchange. Table 4.12-10 identifies the estimated exterior traffic noise levels, without barrier attenuation, for the 20 study area roadway segments under Existing and Existing with Project conditions with us of the Placentia interchange.

Table 4.12-9 shows that the traffic noise levels with Existing and Existing with Project conditions with trucks using the Harley Knox/I-215 interchange would range from 58.8 to 76.7 dBA CNEL. The Project is expected to generate existing off-site traffic noise level increases ranging from 0.0 dBA CNEL to up to 8.4 dBA CNEL. Based on the 5 dBA CNEL increase significance criteria when noise levels at noise-sensitive land uses are below 60 dBA CNEL or the 3 dBA CNEL increase criteria when the noise levels already exceed 60 dBA CNEL, 1 of the 27 study area roadway segments are shown to experience potentially significant off-site traffic noise level increases due to the Project truck trip distribution under Existing with Project conditions. The existing noise-sensitive land uses on this segment are described below. All other roadway segments would not experience noise level increases at sensitive receivers under Existing with Project conditions that would exceed the established thresholds of significance.

- Non-conforming, existing noise-sensitive uses on Harley Knox Boulevard east of Perris Boulevard (Segment 15). A review of the Project study area indicates that three existing residences adjacent to this segment do not conform to the underlying industrial land use designation of the PVCC SP and City of Perris Zoning Map. Therefore, these residences are considered an existing non-conforming use. Even though these existing non-conforming residences likely would ultimately be developed with land uses that are consistent with the underlying industrial land use designation of the PVCCSP and City of Perris Zoning Map, for purposes of analysis they are considered sensitive noise receivers until such time they are unoccupied or no longer exist.

Table 4.12-10 shows that the traffic noise levels under Existing conditions would range from 63.0 to 76.1 dBA CNEL, and the noise levels under Existing with Project conditions with trucks using the Placentia Avenue/I-215 interchange would range from 63.4 to 76.1 dBA CNEL. The Project is expected to generate existing off-site traffic noise level increases ranging from 0.0 dBA CNEL to up to 9.2 dBA CNEL. Based on the established significance criteria, 1 of the 20 study area roadway segments is shown to experience potentially significant off-site traffic noise level increases due to the Project truck trip distribution under Existing with Project conditions. The existing noise-sensitive land uses this segment is described below. All other roadway segments would not experience noise level increases under Existing with Project conditions that would exceed the established thresholds of significance.

Table 4.12-9 Existing Conditions with Project Traffic Noise Impacts (Harley Knox Interchange)

ID	Road	Segment	CNEL at Adjacent Land Use (dBA) ¹			Noise-Sensitive Land Use? ²	Incremental Noise Level Increase Threshold ³	
			Existing Ambient	Existing +Project	Project Increase		Limit	Exceeded?
1	Perris Bl.	n/o Harley Knox Bl.	76.7	76.7	0.0	No	n/a	No
2	Perris Bl.	s/o Harley Knox Bl.	75.7	75.7	0.0	No	n/a	No
3	Perris Bl.	n/o Ramona Expwy.	75.5	75.5	0.0	No	n/a	No
4	Perris Bl.	s/o Ramona Expwy.	74.8	74.8	0.0	No	n/a	No
5	Perris Bl.	s/o Morgan St.	75.0	75.1	0.1	No	n/a	No
6	Perris Bl.	s/o Rider St.	75.3	75.4	0.1	Yes	3.0	No
7	Redlands Av.	s/o Harley Knox Bl.	68.5	73.7	5.2	No	n/a	No
8	Redlands Av.	s/o Markham St.	68.9	73.8	4.9	No	n/a	No
9	Redlands Av.	s/o Ramona Expwy.	64.4	72.8	8.4	No	n/a	No
10	Redlands Av.	s/o Rider St.	67.5	67.6	0.1	Yes	3.0	No
11	Harley Knox Bl.	e/o Western Wy.	74.0	75.8	1.8	No	n/a	No
12	Harley Knox Bl.	e/o Patterson Av.	73.6	75.5	1.9	No	n/a	No
13	Harley Knox Bl.	e/o Webster Av.	73.3	75.3	2.0	No	n/a	No
14	Harley Knox Bl.	e/o Indian Av.	72.2	75.0	2.8	No	n/a	No
15	Harley Knox Bl.	e/o Perris Bl.	67.8	72.8	5.0	Yes	3.0	Yes
16	Markham St.	w/o Redlands Av.	58.8	58.8	0.0	No	n/a	No
17	Ramona Expwy.	w/o Nevada Av.	75.8	75.8	0.0	No	n/a	No
18	Ramona Expwy.	e/o Nevada Av.	75.5	75.5	0.0	No	n/a	No
19	Ramona Expwy.	e/o Webster Av.	75.0	75.0	0.0	No	n/a	No
20	Ramona Expwy.	e/o Indian Av.	75.1	75.1	0.0	No	n/a	No
21	Ramona Expwy.	e/o Perris Bl.	74.6	74.7	0.1	Yes	3.0	No
22	Ramona Expwy.	w/o Redlands Av.	74.9	74.9	0.0	Yes	3.0	No
23	Ramona Expwy.	e/o Redlands Av.	75.4	75.4	0.0	No	n/a	No
24	Morgan St.	e/o Perris Bl.	62.8	63.2	0.4	No	n/a	No
25	Rider St.	e/o Perris Bl.	73.7	73.7	0.0	Yes	3.0	No
26	Rider St.	w/o Redlands Av.	73.7	73.8	0.1	Yes	3.0	No
27	Rider St.	e/o Redlands Av.	74.6	74.6	0.0	Yes	3.0	No

¹ The CNEL is calculated at the boundary of the right-of-way of each roadway and the nearest adjacent land use.

² Yes = Existing, noise-sensitive land uses adjacent to the study area roadway segment.

³ Does the Project create an incremental noise level increase exceeding the established significance criteria?

Source: (Urban Crossroads, 2020a)

Table 4.12-10 Existing Conditions with Project Traffic Noise Impacts (Placentia Interchange)

ID	Road	Segment	CNEL at Adjacent Land Use (dBA) ¹			Noise-Sensitive Land Use? ²	Incremental Noise Level Increase Threshold ³	
			Existing Ambient	Existing +Project	Project Increase		Limit	Exceeded?
1	Indian Av.	s/o Morgan St.	72.2	75.4	3.2	No	n/a	No
2	Indian Av.	s/o Rider St.	70.3	74.6	4.3	Yes	3.0	Yes
3	Perris Bl.	n/o Ramona Exwy.	75.5	75.5	0.0	No	n/a	No
4	Perris Bl.	s/o Ramona Exwy.	74.7	74.7	0.0	No	n/a	No
5	Perris Bl.	s/o Morgan St.	75.0	75.0	0.0	No	n/a	No
6	Perris Bl.	s/o Rider St.	75.2	75.2	0.0	Yes	3.0	No
7	Perris Bl.	s/o Placentia Av.	75.3	75.3	0.0	Yes	3.0	No
8	Redlands Av.	n/o Morgan St.	63.0	63.4	0.4	No	n/a	No
9	Redlands Av.	s/o Rider St.	68.2	68.3	0.1	No	n/a	No
10	Redlands Av.	s/o Placentia Av.	70.0	70.0	0.0	Yes	3.0	No
11	Ramona Exwy.	w/o Perris Bl.	76.1	76.1	0.0	No	n/a	No
12	Ramona Exwy.	e/o Perris Bl.	75.6	75.6	0.0	Yes	3.0	No
13	Morgan St.	e/o Indian Av.	64.9	73.2	8.3	No	n/a	No
14	Morgan St.	e/o Perris Bl.	64.0	73.2	9.2	No	n/a	No
15	Rider St.	e/o Perris Bl.	73.2	73.3	0.1	Yes	3.0	No
16	Rider St.	e/o Redlands Av.	74.2	74.2	0.0	Yes	3.0	No
17	Placentia Av.	w/o I-215 Frontage Rd.	71.5	71.5	0.0	No	n/a	No
18	Placentia Av.	w/o Indian Av.	-.4	-.4	-.4	Yes	3.0	No
19	Placentia Av.	e/o Indian Av.	-.4	-.4	-.4	No	n/a	No
20	Placentia Av.	e/o Perris Bl.	68.7	68.8	0.1	Yes	3.0	No

¹ The CNEL is calculated at the boundary of the right-of-way of each roadway and the nearest adjacent land use.

² Yes = Existing, noise-sensitive land uses adjacent to the study area roadway segment.

³ Does the Project create an incremental noise level increase exceeding the established significance criteria?

⁴ The I-215 Freeway and Placentia Avenue interchange is anticipated to be completed and operational in 2021.

Source: (Urban Crossroads, 2020b)

- Non-conforming, existing noise-sensitive uses (non-conforming residences) on Indian Avenue south of Rider Street (Segment 2). A review of the Project study area indicates that the seven existing residences adjacent to this segment do not conform to the underlying business professional land use designation of the PVCCSP and City of Perris Zoning Map. Therefore, these residences are considered an existing non-conforming use. Even though these existing non-conforming residences likely would ultimately be developed with land uses that are consistent with the underlying business professional office land use designation, for purposes of analysis they are considered sensitive noise receivers until such time they are unoccupied or no longer exist.

Off-site Traffic Noise Mitigation

To reduce the potentially significant Project traffic noise level increases for Existing plus Project conditions, potential noise mitigation measures, including use of rubberized asphalt hot mix pavement and off-site noise barriers for the existing non-conforming residential use adjacent to impacted roadway segments, have been considered.

Rubberized Asphalt

Due to the potential noise attenuation benefits, rubberized asphalt is considered as a mitigation measure for the Project-related roadway improvements associated with Project construction. To reduce traffic noise levels at the noise source, Caltrans research has shown that rubberized asphalt can provide noise attenuation of approximately 4 dBA for automobile traffic noise levels. Changing the pavement type of a roadway has been shown to reduce the amount of tire/pavement noise produced at the source under both near-term and long-term conditions. Traffic noise is generated primarily by the interaction of the tires and pavement, the engine, and exhaust systems. For automobiles noise, as much as 75 to 90-percent of traffic noise is generated by the interaction of the tires and pavement, especially when traveling at higher and constant speeds. According to research conducted by Caltrans and the Canadian Ministry of Transportation and Highways, a 4 dBA reduction in tire/pavement noise is attainable using rubberized asphalt under typical operating conditions.

The effectiveness of reducing traffic noise levels is higher on roadways with low percentages of heavy trucks, since the heavy truck engine and exhaust noise is not affected by rubberized alternative pavement due to the truck engine and exhaust stack height above the pavement itself. Per Caltrans guidance a truck stack height is modeled using a height of 11.5 feet above the road. With the primary off-site traffic noise source consisting of heavy trucks with a stack height of 11.5 feet off the ground, the tire/pavement noise reduction benefits associated rubberized asphalt primarily would be limited to autos.

While the off-site Project-related traffic noise level increases would theoretically be reduced with the 4 dBA reduction provided by rubberized asphalt, the reduction would not provide reliable benefits for the noise levels generated by heavy truck traffic. This is, as previously stated, due to the noise source height difference between automobiles and trucks. While rubberized asphalt would provide some noise reduction, it is only effective for tire-on-pavement noise at higher speeds and would not reduce truck-related off-site traffic noise levels associated with truck engine and exhaust stacks to less than significant impacts. Since the use of rubberized asphalt would not lower the off-site traffic noise levels below a level of significance, rubberized asphalt is not proposed as mitigation for the Project and the off-site Project-related traffic noise level increases at the noise-sensitive receiver along Harley Knox Boulevard uses would remain significant and unavoidable.

Off-Site Noise Barriers

Since existing and future noise-sensitive receiving land uses are located adjacent to the impacted roadway segments in the Project study area, off-site noise barriers were considered as a potential traffic noise mitigation measure to reduce the impacts. Off-site noise barriers are estimated to provide a readily perceptible 5 dBA reduction which, according to the FHWA, is simple to attain when blocking the line-of-sight from the noise source to the receiver. Caltrans guidance in the Highway Design Manual, Section 1102.3(3), indicates that for design purposes, the noise barrier should intercept the line of sight from the

exhaust stack of a truck to the receptor, and an 11.5-foot-high truck stack height is assumed to represent the truck engine and exhaust noise source. Therefore, any exterior noise barriers at receiving noise sensitive land uses experiencing Project-related traffic noise level increases would need to be high enough and long enough to block the line-of-sight from the noise source (at 11.5 feet high per Caltrans) to the receiver (at 5 feet high per FHWA guidance) in order to provide a 5 dBA reduction per FHWA guidance.

In addition, according to FHWA guidance, outdoor living areas are generally limited to outdoor living areas of frequent human use (e.g., backyards of single-family homes). Therefore, front and side yards of residential homes adjacent to off-site roadway segments do not represent noise sensitive areas of frequent human use that require exterior noise mitigation. Exterior noise mitigation in the form of noise barriers is not anticipated to provide the FHWA attainable reduction of 5 dBA required to reduce the off-site traffic noise level increases and would also require potential openings for driveway access to individual residential lots fronting the road. As such, off-site noise barriers would not be feasible and would not lower the off-site traffic noise levels below a level of significance, and therefore, noise barriers are not proposed as mitigation for the Project.

Significance of Off-Site Traffic Noise Impacts

Because neither form of mitigation would eliminate the off-site traffic noise level increases at the sensitive land uses adjacent to the impacted roadway segments, the Project-related off-site traffic noise level increases at adjacent noise-sensitive land uses are considered a significant and unavoidable impact.

Additional Project-Level Mitigation Measures

As discussed above, there are no feasible mitigation measures available that would reduce the Project's traffic-related noise impacts to less-than-significant levels.

The following mitigation measure addresses construction-related noise impacts.

MM 12-1 Prior to the issuance of each grading permit, the Property Owner/Developer shall provide evidence to the City that the Contractor Specifications require that a minimum 100-foot buffer zone be provided to separate large construction equipment (e.g. dozers, graders, scrapers, etc.) from receiver locations R2 (Morgan Park) and R7 (residential property line at 475 E Rider Street).

Level of Significance After Mitigation

Construction-related noise impacts would be less than significant.

Off-site traffic noise impacts would be significant and unavoidable.

Threshold b Would the project result in generation of excessive groundborne vibration or groundborne noise levels?
--

Construction-related Vibration Impacts

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures, and soil type. It is expected that ground-borne vibration

from Project construction activities would cause only intermittent, localized intrusion. The Project's construction activities most likely to cause vibration impacts include the following:

- **Heavy Construction Equipment.** Although all heavy mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage. It should be noted that no pile driving is required for construction of the Project, including the Rider Street bridge.
- **Trucks.** Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes generally eliminates the problem.

Ground-borne vibration levels resulting from construction activities occurring within the Project area were estimated by data published by the FTA. Construction activities that would have the potential to generate low levels of ground-borne vibration within the Project area include grading. Using the vibration source level of construction equipment provided on Table 6-7 of the Project's Noise Analysis (Appendix K) and the construction vibration assessment methodology published by the FTA, it is possible to estimate the Project vibration impacts. Tables 10-6 and 10-7 presents the expected Project related vibration levels at the nearby receiver locations with construction of the Rider 2 and 4 buildings, and the PVSD Channel improvements (including the Rider Street bridge), respectively.

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 25 feet. Construction vibration levels are expected to range from 29.3 to 78.0 VdB at residential receiver locations. Using the construction vibration assessment methods provided by the FTA, Project construction vibration levels would not exceed the FTA 78 VdB threshold at all sensitive residential receiver locations, and therefore, vibration-related impacts would be less than significant. Further, vibration levels at the site of the closest sensitive receiver are unlikely to be sustained during the entire construction period but would occur rather only during the times that heavy construction equipment is operating at the Project area perimeter.

Operational-Related Vibration Impacts

To assess the potential vibration impacts from truck haul trips associated with operational activities the FTA Transit Noise and Vibration Impact Assessment Manual maximum-acceptable vibration criteria of 78 VdB for daytime residential uses in buildings where people normally sleep is used. However, trucks rarely create vibration that exceeds 70 VdB (unless there are bumps due to frequent potholes in the road). Trucks transiting on the Rider 2 and Rider 4 sites would be travelling at very low speeds so it is expected that truck vibration impacts at the nearest homes would satisfy the maximum-acceptable vibration criteria of 78 VdB for daytime and 72 VdB for nighttime for residential uses, and therefore, would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project-generated vibration impacts during construction and operation would be less than significant.

Threshold 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?

There are no private airport facilities within the Project vicinity, although the MARB/IPA is located approximately 2.6 miles northwest of the Project area. As previously discussed, the MARB/IP ALUCP, Map MA-1, indicates that the Project area is located within Compatibility Zones C-1 and D, and the Table MA-1 Compatibility Zone Factors indicates that this area is considered to have a moderate to low noise impact, and is mostly within the 55 dBA CNEL contour with a portion of the southwestern part of the Rider 2 site within 60 dBA CNEL contour (refer to Exhibit 3-A of the Noise Analysis). Further, the Basic Compatibility Criteria, listed in Table MA-2 of the MARB/IPA LUCP identifies no prohibited uses other than those that would pose a safety risk due to building height. The MARB/IPA LUCP does not identify industrial-use specific noise compatibility standards, and therefore, the OPR Land Use Compatibility for Community Noise Exposure, previously discussed, is used to assess potential aircraft-related noise levels within the Project area. The OPR guidelines indicate that industrial uses, such as the Project, are considered *normally acceptable* with exterior noise levels of up to 70 dBA CNEL. The Project would have a less than significant related to the exposure of people to excessive noise levels from airport operations. Notwithstanding this conclusion, as required by the PVCCSP, notice would be provided to potential purchasers or tenants that the Project is within the MARP/IPA AIA (refer to mitigation measure MM Haz 4 in Section 4.9, Hazards and Hazardous Materials, of this EIR).

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

4.12.5 CUMULATIVE IMPACTS

Section 4.7.6, Cumulative Impacts, of the IPDC Final EIR discusses cumulative noise impacts in the PVCCSP area. The PVCCSP EIR determined that the noise impact of construction of development and infrastructure projects in the PVCCSP area would not be cumulatively considerable or significant, but off-site impacts due to traffic from buildout of allowed uses under the PVCCSP would exceed significance thresholds along roadway segments adjacent to sensitive receptors resulting in a substantial increase in the ambient noise environment. Therefore, the potential cumulative noise impacts would be significant, and the cumulative contribution of PVCCSP-generated traffic would be considerable.

As discussed under the analysis of Threshold a, Project construction-related noise impacts would be less than significant. As it is unlikely that any other cumulative developments would be under construction in close proximity to the Project concurrent with Project construction, cumulatively-considerable construction-related noise impacts would be less than significant. Additionally, the analysis of operational-related noise level contributions, which are presented in Table 4.12-7 and Table 4.12-8, demonstrates that Project-related operational noise would not result in a cumulative increase in noise levels that exceeds the City's thresholds of significance.

With respect to traffic-related noise impacts, Table 7-5 of the Project's Noise Analysis included in Appendix K of this EIR presents a comparison of the Existing and the Existing plus Ambient plus Cumulative (EAC) with Project CNEL noise levels with trucks using the Harley Knox Boulevard/I-215 interchange. Table 7-5 also presents a comparison of the cumulative off-site traffic impact based on the difference between the Existing and the EAC plus Project traffic volumes. Table L of the Focused Noise Analysis provides this information with trucks using the Placentia Avenue/I-215 interchange. This comparison is used by the City of Perris to describe the cumulative off-site traffic noise impacts. The cumulative off-site traffic noise impacts would range from 0.2 dBA CNEL to 9.2 dBA CNEL with use of the Harley Knox Boulevard/I-215 interchange, and 0.4 dBA CNEL to 9.4 dBA CNEL with use of the Placentia Avenue/I-215 interchange.

Based on the 5 dBA CNEL increase significance criteria when noise levels at noise-sensitive land uses are below 60 dBA CNEL or the 3 dBA CNEL increase criteria when the noise levels already exceed 60 dBA CNEL, the same study area roadway segment and associated sensitive receiver impacted under the Existing with Project conditions would be impacted with truck use of only the Harley Knox Boulevard/I-215 interchange: the non-conforming, existing noise-sensitive uses on Harley Knox Boulevard east of Perris Boulevard along Segment 15. With truck use of only the Placentia Avenue/I-215 interchange, and consistent with the Existing with Project conditions, the non-conforming, existing non-conforming residences on Indian Avenue south of Rider Street (Segment 2) would be impacted. Additionally, residential uses on Placentia Avenue east of Perris Boulevard (along Segment 20) would be impacted with truck use of only the Placentia Avenue/I-215 interchange. This area is largely developed with residential tract homes located north and south of Placentia Avenue. Consistent with the City of Perris exterior noise requirements, these homes benefit from exterior noise barriers needed to reduce the future long-range General Plan buildout traffic condition on Placentia Avenue. While exterior noise mitigation is provided for these existing noise-sensitive residential land uses adjacent to Placentia Avenue, the residents may perceive a Project-related cumulative traffic noise level increase exceeding the PVCCSP EIR noise criteria. As previously discussed, there is no feasible mitigation for this impact. Therefore, the Project's potential cumulative off-site traffic-related noise impacts would be significant, and the cumulative contribution would be considerable resulting in a significant and unavoidable cumulative impact.

The analysis presented under Threshold b demonstrates that Project-related vibration impacts would be less than significant during Project construction and operation. As it is unlikely that other sources of vibration would occur concurrent with Project construction activities, impacts would be less-than-cumulatively considerable. For long-term operation, vibration from truck traffic is rarely perceptible beyond the roadway right-of-way, and vibration impacts would therefore be less than cumulatively considerable.

The Project would not be exposed to airport-related noise levels in excess of 70 dBA. Additionally, there are no components of the Project that would cause or contribute to increased aircraft activity in the local area. Thus, Project impacts due to airport-related noise would be less than cumulatively considerable.

4.12.6 REFERENCES

Urban Crossroads, 2020a. *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Noise Impact Analysis*, City of Perris. August 31, 2020. Included in Appendix K of this EIR.

Urban Crossroads, 2020b. *Focused Off-site Noise Analysis (With I-215 Freeway/Placentia Avenue Interchange)*, City of Perris. July 17, 2020. Included in Appendix K of this EIR.

4.13 TRANSPORTATION

This section assesses transportation impacts resulting from implementation of the Project. In accordance with Senate Bill (SB) 743, further discussed under 4.13.2 Existing Policies and Regulations, below, the California Natural Resources Agency (CNRA) adopted changes to the California Environmental Quality Act (CEQA) Guidelines in December 2018, which identify that vehicle miles traveled (VMT) is the appropriate metric to evaluate a project's transportation impacts. As of December 2018, when the revised CEQA Guidelines were adopted, automobile delay, as measured by "level of service" (LOS) and other similar metrics, no longer constitutes a significant environmental effect under CEQA. Lead agencies in California must begin using VMT to evaluate project transportation impacts no later than starting on July 1, 2020. The City of Perris adopted its *Transportation Impact Analysis Guidelines for CEQA*, which includes guidance for conducting the required VMT analysis, on June 9, 2020.

Notwithstanding the current method of analysis for CEQA purposes, the Perris Valley Commerce Center Specific Plan (PVCCSP) Environmental Impact Report (EIR) mitigation measure MM Trans 7 requires project-level traffic impact studies to be prepared for individual development projects in the PVCCSP area. The City of Perris continues to require the Project-level traffic analysis to inform the development of conditions of approval for individual projects implementing the PVCCSP. The City-required *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Traffic Impact Analysis, City of Perris* has been prepared (Urban Crossroads, 2020a), and is provided in Appendix L of this EIR, for informational purposes and to comply with PVCCSP EIR MM Trans 7. Information from the Project-level traffic analysis is also used as the basis for addressing other Project impacts (e.g., air quality and health risk, greenhouse gas emissions, noise, etc.), as discussed in the respective sections of this EIR. It should be noted that due to the planned construction of a new interchange at Placentia Avenue and Interstate (I)-215, the City of Perris also required that in addition to a traffic study assessing the use of the Harley Knox Boulevard interchange at I-215, a focused traffic study assuming the use of the Placentia Avenue/I-215 intersection be prepared. *The IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Focused Traffic Assessment (With I-215 Freeway/Placentia Avenue Interchange), City of Perris* (Urban Crossroads, 2020b) is also included in Appendix L of this EIR. Each traffic study is conservative to the extent that they assume all of the Project truck traffic would either use the Harley Knox Boulevard/I-215 or Placentia Avenue/I-215 interchange.

In response to the Notice of Preparation (NOP), a comment regarding transit facilities was received from the Riverside Transit Agency regarding the provision of pedestrian and transit facilities in the vicinity of the Project. Additionally, the South Coast Air Quality Management District (SCAQMD) provided input on trip generation rates for high cube warehouse projects.

Additionally, at the Draft EIR public scoping meeting on November 6, 2019, the City of Perris Planning Commission requested that the following issues be addressed: traffic impacts; use of truck routes that avoid sensitive receptors; and avoidance of the use of Perris Boulevard, except to cross this street to get to the designation.

4.13.1 EXISTING SETTING

Regional and Local Roadway Circulation System

As identified in the PVCCSP EIR, there are two primary transportation facilities located within the PVCCSP area: I-215 and Ramona Expressway. I-215, traversing north to south, is the only State highway located in the Specific Plan area and parallels its western boundary. Ramona Expressway is a City facility that traverses east to west through the PVCCSP area. Figure 4.13-1, Existing Circulation System, depicts the existing circulation system (e.g., number of lanes, divided or undivided roadway, etc.).

Under existing conditions, regional access to the Project area is provided via I-215. Local access to the Project area is currently provided from Redlands Avenue (recently constructed west of the Project area), and Rider Street (south of the Project area), and Morgan Street (currently terminates at its intersection with Redlands Avenue northwest of the Project area).

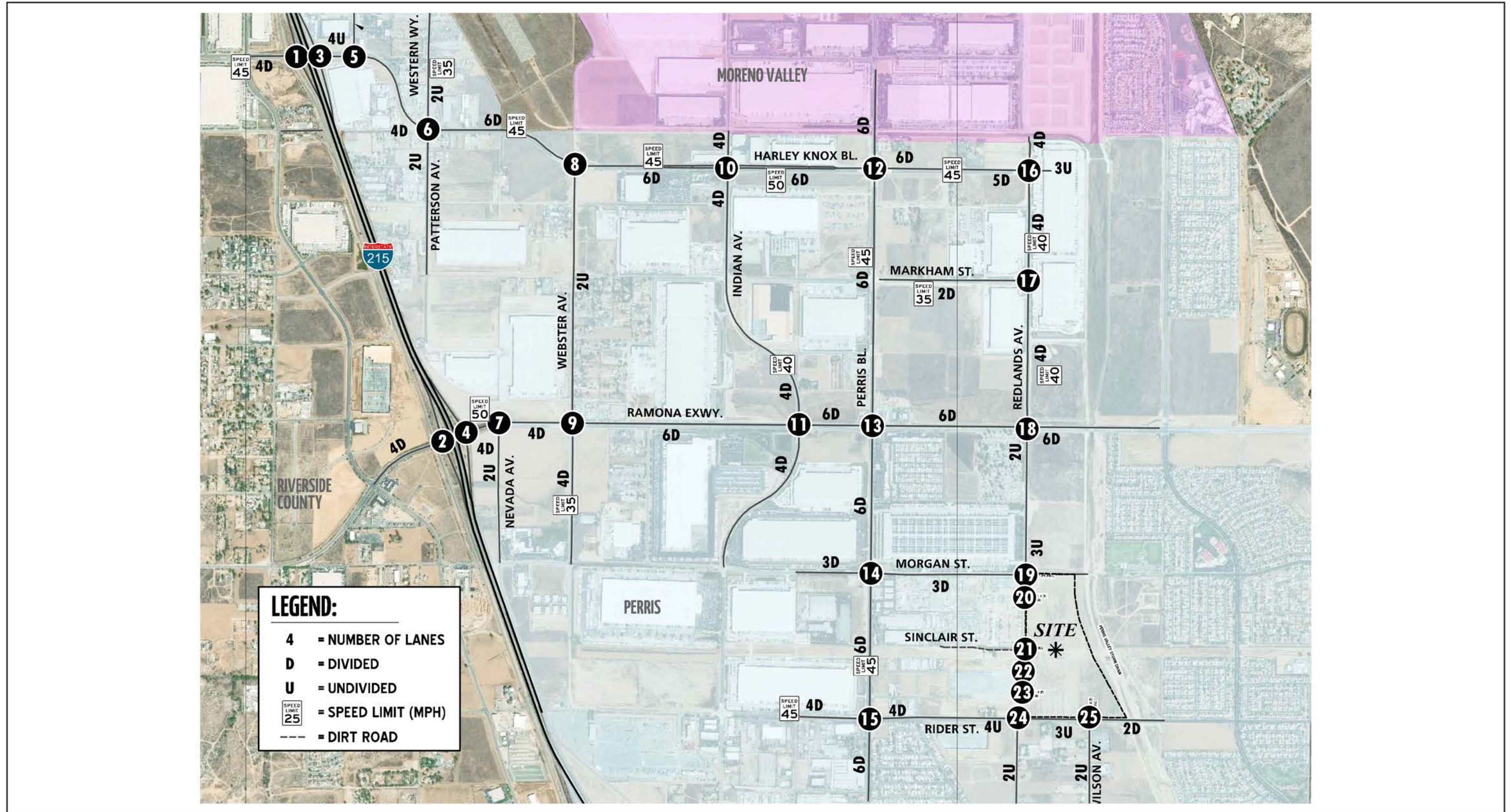
Truck Routes

The PVCCSP designated truck route map is shown on Figure 4.13-2, Perris Valley Commerce Center Specific Plan Truck Route Plan. As shown, Harley Knox Boulevard, Indian Avenue, Perris Boulevard, Redlands Avenue, Morgan Street, and portions of Rider Street are identified as designated truck routes. Although the City's General Plan Circulation Element truck route map identifies Ramona Expressway as a designated truck route, consistent with the PVCCSP truck route plan, the City prohibits truck access along Ramona Expressway. It should be also be noted that the City's policy is for trucks to utilize the Harley Knox Boulevard interchange at I-215. As such, the truck route for the Project area under existing conditions is for truck traffic to travel north on Redlands Avenue and then west on Harley Knox Boulevard to I-15.

Transit Service

Transit service in the Project area is provided by the Riverside Transit Authority (RTA), a public transit agency serving the Riverside County region. As shown in Figure 4.13-3, Existing Transit Routes, existing RTA Route 41 travels along Rider Street along the southern boundary of the Project. This route traverses through the PVCCSP area along portions of the Ramona Expressway, Perris Boulevard, and Rider Street and connects the Mead Valley Community Center to the Riverside County Regional Medical Center in Moreno Valley by traveling through the City of Perris. Further, Route 19 travels through the PVCCSP area along Perris Boulevard connecting the Moreno Valley Mall to the City of Perris Civic Center and Downtown. This route includes alternate routing that traverses west on the Ramona Expressway and makes a loop, following Indian Avenue, Morgan Street, Webster Avenue and then back to the Ramona Expressway; this loop provides service to several large employers and a high school.

Transit service is reviewed and updated by RTA periodically to address ridership, budget and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate. Consistent with mitigation measure MM Trans 4 of the PVCC SP EIR, the Project Applicant has coordinated with RTA with respect to the bus routes and bus stops.

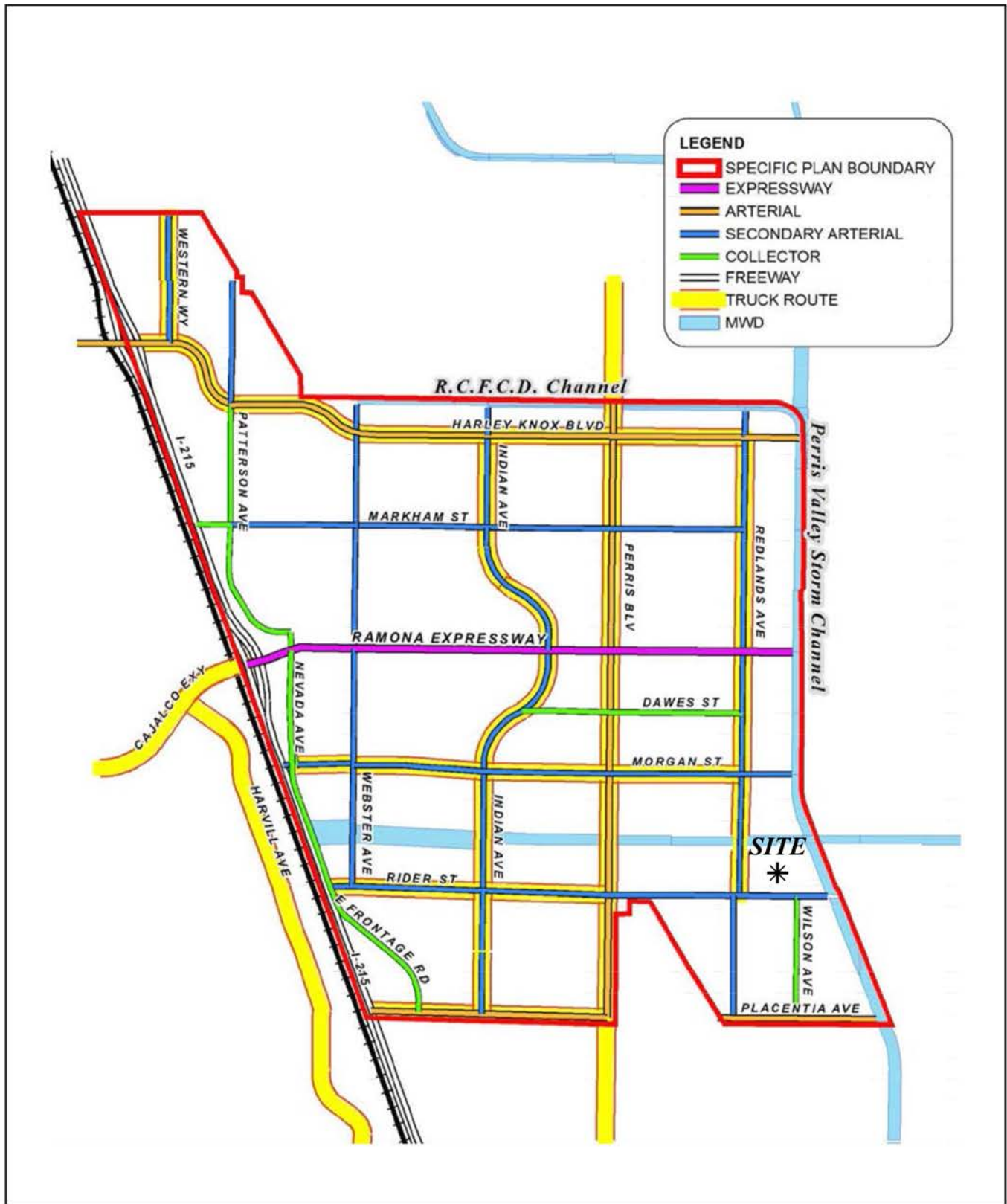


Source(s): Urban Crossroads (02-26-2020)

Figure 4.13-1



Existing Circulation System

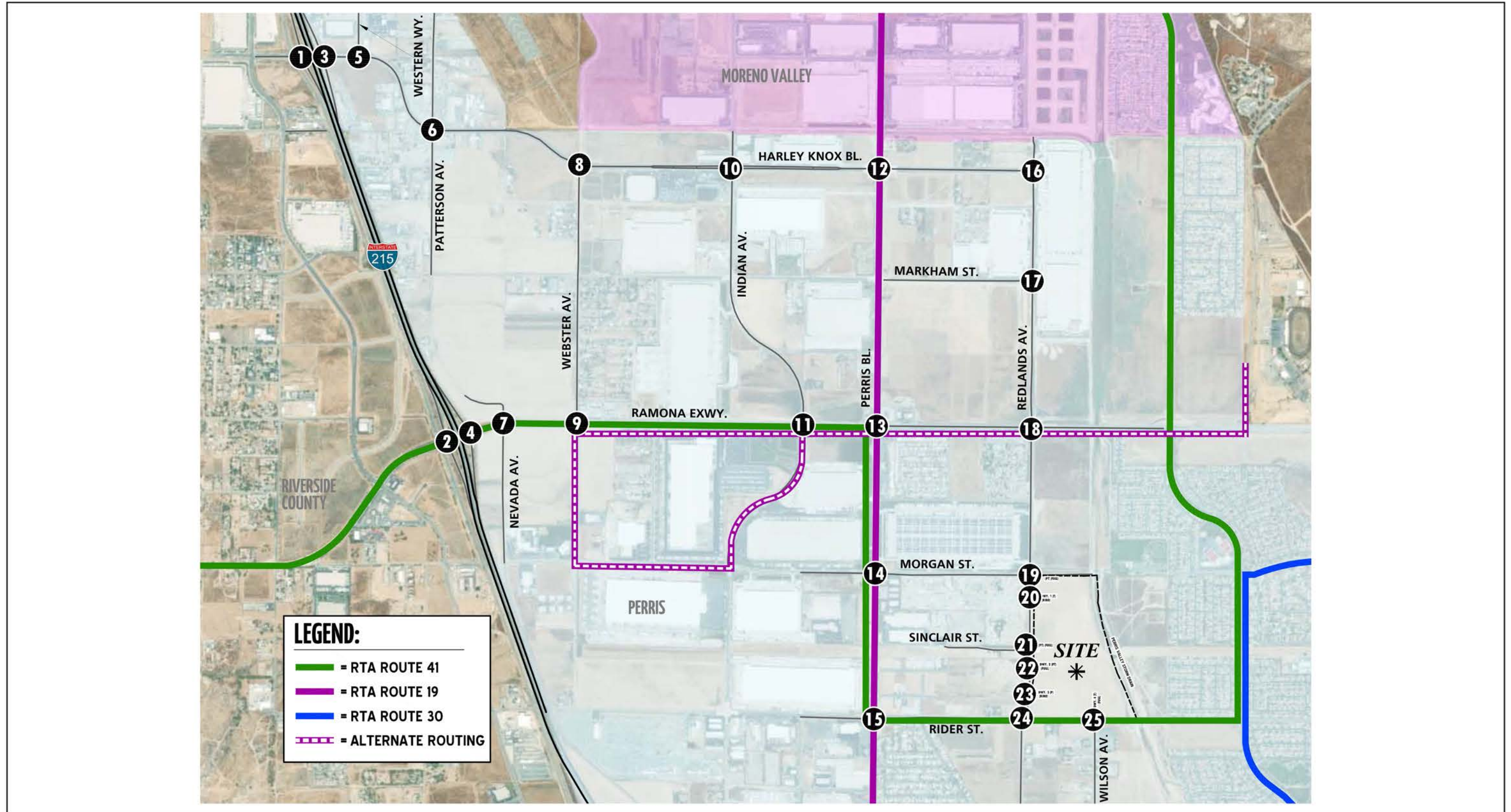


Source(s): Urban Crossroads (02-26-2020)

Figure 4.13-2



Perris Valley Commerce Center Specific Plan Truck Route Plan



Source(s): Urban Crossroads (02-26-2020)

Figure 4.13-3



Existing Transit Routes

RTA has confirmed that there are no other RTA routes anticipated to serve the Project aside from the existing Route 41. New bus stops requested by RTA along the existing route near the intersection of Rider Street and Redlands Avenue are being completed by the Rider 1 and Rider 3 projects.

The PVCCSP identified the Perris Valley Rail Line (PVL), which was planned as part of RCTC's Metrolink system. This passenger train is now in operation and runs from the Los Angeles Union Station to the Perris-South Station on A Street (near the Orange Empire Railway Museum). The PVL uses the tracks parallel and west of I-215, west of the Project area. Stops along the PVL include the Perris-Downtown Station and Moreno Valley/March Field Station.

Bicycle and Pedestrian Facilities

In an effort to promote alternative modes of transportation, the City of Perris General Plan Circulation Element and PVCCSP identify trails and bicycle facilities. The PVCCSP Trail System is shown on Figure 3.0-5 of the PVCCSP. There are regional trails planned along Ramona Expressway and the Perris Valley Storm Drain (PVSD) Channel, and planned Class II bike lanes along Perris Boulevard, Morgan Street, and Rider Street. Figure 4.13-4, depicts the existing bicycle and pedestrian facilities, including bike lanes, sidewalks and crosswalk locations along roadways with use of the Harley Knox Boulevard truck route, and Figure 4.13-5 shows this information relevant to roadways with use of the Placentia Avenue truck route. It should be noted that an on-street bikeway has recently been constructed along Rider Street as part of the Rider 3 building project the Rider 3 Project; the on-street bikeway extends approximately 140 feet east of Redlands Avenue, adjacent to the Rider 2 site. Additionally, sidewalks have been constructed along Rider Street and Redlands Avenue as part of the Rider 1 and/or Rider 3 projects. It should also be noted that the planned MWD trail extends between the Rider 2 and Rider 4 building sites.

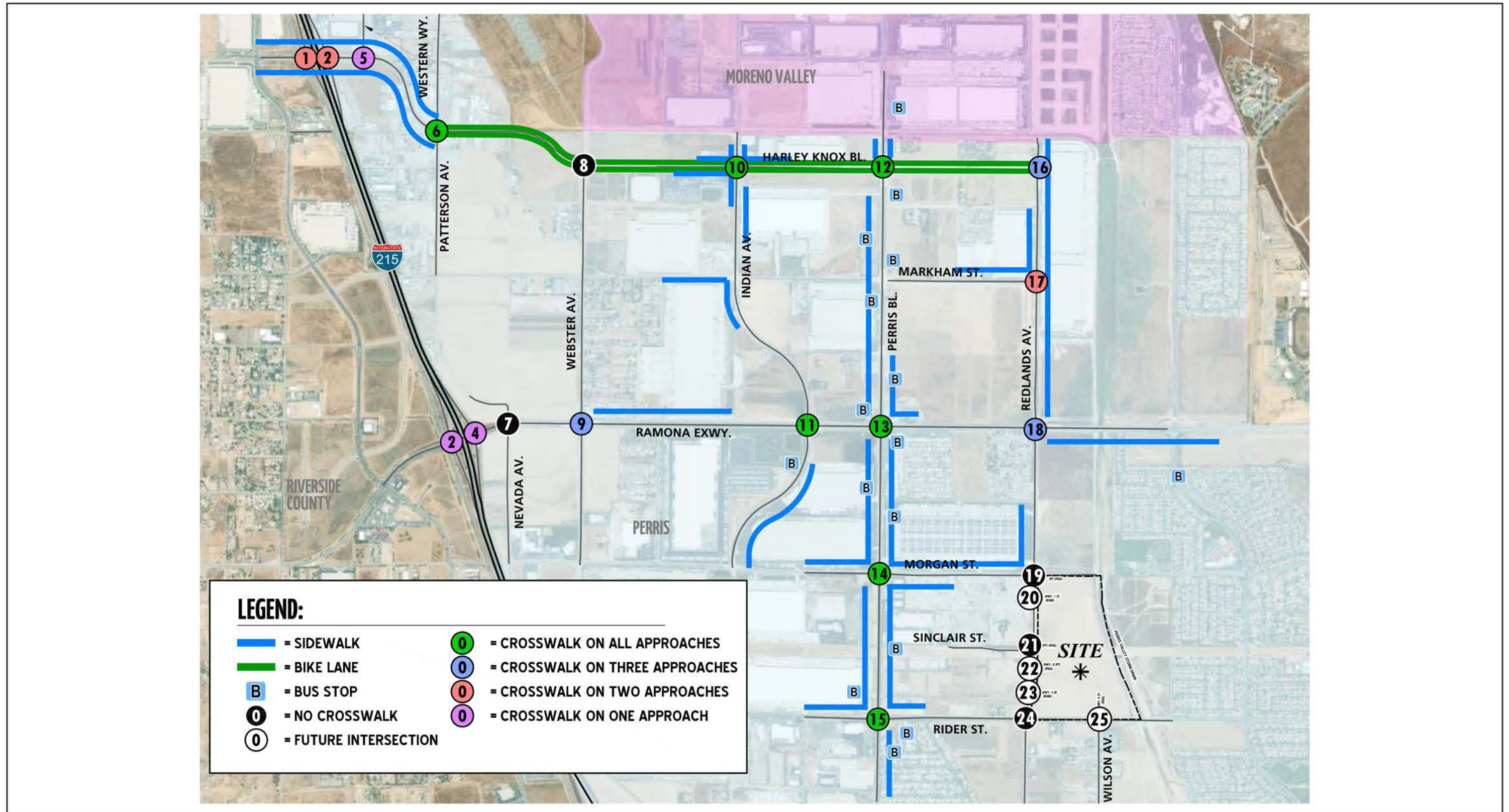
4.13.2 EXISTING POLICIES AND REGULATIONS

Section 4.10 of the PVCCSP EIR provides a discussion of "Related Regulations" relevant to development within the PVCCSP area, including Levels of Service, City of Perris General Plan, Fair Share Fee Programs, Guidelines Pertaining to Fire Department Access, and Design Considerations. The Project-specific traffic impact analysis (TIA) included in Appendix L of this EIR also discusses existing regulations related to transportation and circulation. Following is a summary of existing policies and regulations that are particularly relevant to the Project.

State of California

Senate Bill 743 and VMT-Based Analyses

Senate Bill 743, which was codified in Public Resources Code (PRC) Section 21099, requires changes to CEQA Guidelines regarding the analysis of transportation impacts. Pursuant to PRC Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." To that end, in developing the criteria, OPR proposed, and the CNRA certified and adopted changes to the CEQA Guidelines in December 2018, which entailed changes to the thresholds of significance for the evaluation of impacts to transportation.

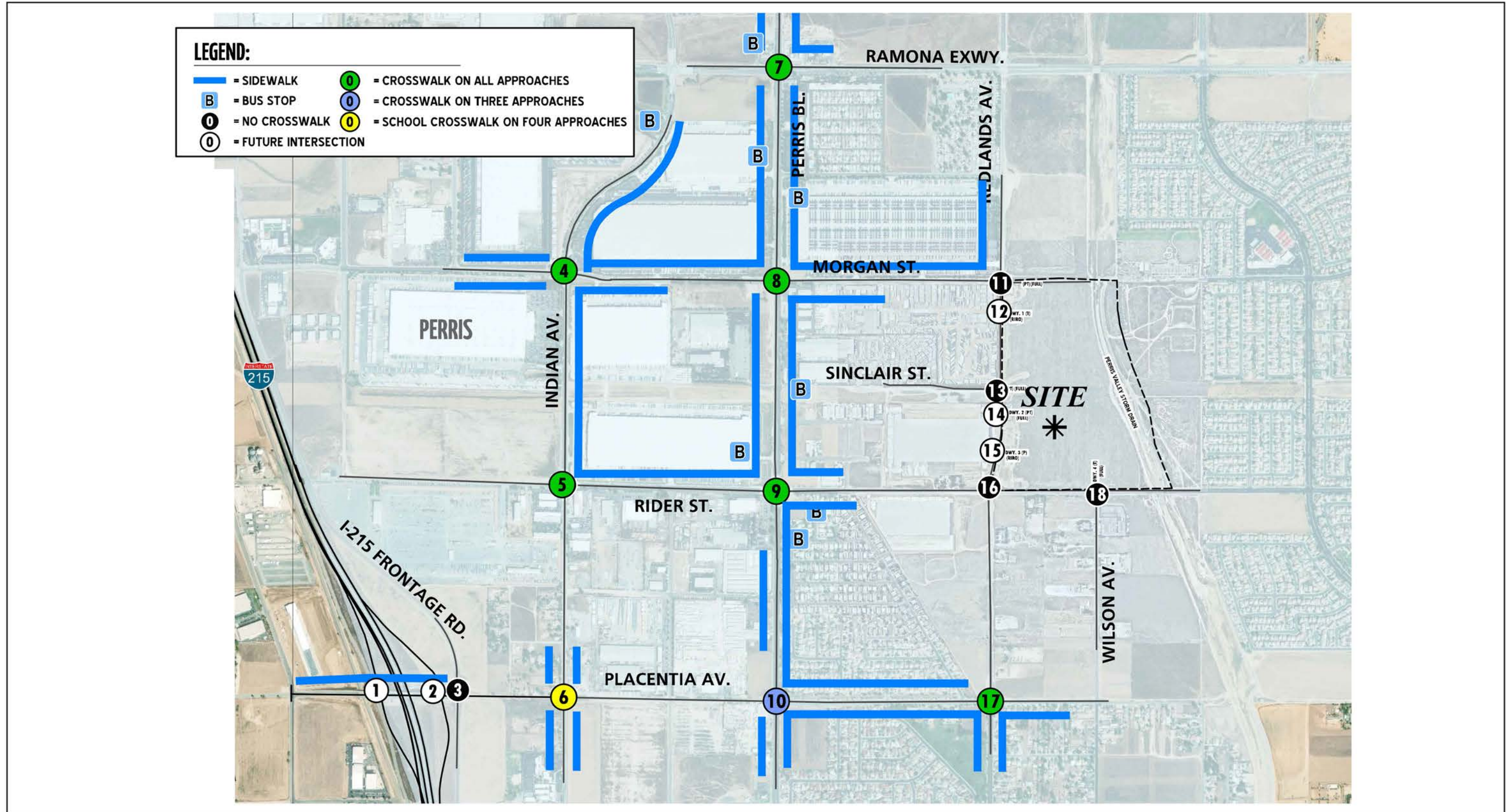


Source(s): Urban Crossroads (02-26-2020)

Figure 4.13-4



**Existing Pedestrian and Bicycle Facilities -
 Harley Knox Boulevard Truck Route**



Source(s): Urban Crossroads (02-26-2020)

Figure 4.13-5



**Existing Pedestrian and Bicycle Facilities -
 Placentia Avenue Truck Route**

The updated CEQA Guidelines include the addition of CEQA Guidelines Section 15064.3, of which Subdivision b establishes criteria for evaluating a project's transportation impacts based on project type and using automobile VMT as the metric. As identified in Section 15064.3(b)(4) of the CEQA Guidelines, a lead agency has the discretion to choose the most appropriate methodology to evaluate a project's VMT. As previously identified, the City of Perris adopted its guidelines for conducting VMT analysis in June 2020. Beginning July 1, 2020, the provisions of CEQA Guidelines Section 15064.3 apply statewide. Pursuant to SB 743 and PRC Section 21099, the requirement for analyzing congestion impacts for CEQA purposes was eliminated in December 2018. Therefore, an analysis of congestion impacts, including analysis of impacts related to the LOS of the circulation system is not provided in this EIR.

Regional Plans

SCAG Regional Transportation Plan/Sustainable Communities Strategy

As further discussed in Section 4.11, Land Use and Planning, of this EIR, the Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code Section 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). The Project area is within SCAG's regional authority. On April 7, 2016, SCAG adopted the *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)* with goals to: (1) align the plan investments and policies with improving regional economic development and competitiveness; (2) maximize mobility and accessibility for all people and goods in the region; (3) ensure travel safety and reliability for all people and goods in the region; (4) preserve and ensure a sustainable regional transportation system; (5) maximize the productivity of our transportation system; (6) protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking); (7) actively encourage and create incentives for energy efficiency, where possible; (8) encourage land use and growth patterns that facilitate transit and active transportation; and (9) maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies. Performance measures and funding strategies also are included to ensure that the adopted goals are achieved through implementation of the RTP. (SCAG, 2016)

In April 2018 SCAG published *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region's freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, state highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet of warehouse building space, and undeveloped land that could accommodate an additional 338 million square feet of new warehouse building space. These regions attract robust logistics activities, and are a major reason why the region is a critical mode in the global supply chain. (SCAG, 2018)

On May 7, 2020, SCAG's Regional Council adopted Connect SoCal (the 2020 - 2045 RTP/SCS) for federal transportation conformity purposes only. In light of the COVID-19 pandemic, the Regional Council will consider approval of Connect SoCal in its entirety and for all other purposes within 120 days from May 7, 2020 (September 2020). Connect SoCal is a long-range visioning plan that builds upon and

expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal also recognizes the opportunities and challenges that come with goods movement, and includes a focus on its rapidly changing nature. As with the 2016-2040 RTP/SCS, Connect SoCal includes a Transportation System Goods Movement Technical Report. (SCAG, 2020)

County of Riverside Congestion Management Program

Within the SCAG region there are five Congestion Management Agencies (CMAs) that have the responsibility of preparing the Congestion Management Program (CMP) for their respective county. In its role as Riverside County's CMA, the Riverside County Transportation Commission (RCTC) prepares and periodically updates the County's CMP to focus on meeting federal Congestion Management System guidelines. The intent of a CMP is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related impacts, and improve air quality. Counties within California have developed CMPs with varying methods and strategies to meet the intent of the CMP legislation. RCTC adopted the current CMP in 2011. None of the study area intersections are identified as CMP facilities in the County of Riverside CMP as the crossing roadways in the TIA study areas (Harley Knox Boulevard, Ramona Expressway and Placentia Avenue) are not CMP facilities (referred to as Principal Arterials in the CMP). However, the RCTC monitors the CMP roadway network system to minimize LOS deficiencies. The RCTC does not require TIAs for development proposals. However, the City is required to maintain minimum LOS thresholds identified in the General Plan and continues to require TIAs on development projects.

Local and Regional Funding Mechanisms

Transportation improvements throughout Riverside County, including the City of Perris, are funded through a combination of direct project mitigation, fair share contributions, or through local and regional transportation mitigation fee programs. The proposed Project is located within the North Perris Road and Bridge Benefit District (NPRBBD), a transportation improvement funding district established by the City of Perris in 2008 to ensure timely impact mitigation with significant local control. Other fee programs applicable to development in the City include the Transportation Uniform Mitigation Fee (TUMF) program and the City of Perris Development Impact Fee (DIF) program. Identification and timing of needed improvements is generally determined through local jurisdictions based upon a variety of factors. Applicable programs are summarized below based information presented in the Project-specific TIA (Urban Crossroads, 2020a).

Transportation Uniform Mitigation Fee (TUMF) Program

The TUMF program is administered by the Western Riverside Council of Governments (WRCOG) based upon a regional Nexus Study most recently updated in 2017 to address major changes in right of way acquisition and improvement cost factors. This regional program was put into place to ensure that development pays its fair share and that funding is in place for construction of facilities needed to maintain the requisite LOS and critical to mobility in the region. TUMF is a truly regional mitigation fee program and is imposed and implemented in every jurisdiction in Western Riverside County. TUMF guidelines

empower a local zone committee to prioritize and arbitrate certain projects. The Project is located in the Central Zone. The zone has developed a 5-year capital improvement program to prioritize public construction of certain roads. TUMF is focused on improvements necessitated by regional growth.

North Perris Road and Bridge Benefit District (NPRBBD)

The NPRBBD is comprised of approximately 3,500 acres of land located in the northern portion of the City of Perris and is consistent with the boundary of the PVCCSP. The Project area is within the boundaries of the NPRBBD. The purpose of the NPRBBD is to improve the efficiency of the financing of specific regional road and bridge improvements that are determined to provide benefit to the developing properties within the NPRBBD boundary. In addition, the NPRBBD includes additional improvements to supplement the TUMF and City of Perris Development Impact Fee (DIF) program network (discussed below). NPRBBD fees are inclusive of TUMF and DIF. The City of Perris DIF program is discussed below. A significant portion of the fees collected through this mechanism are earmarked for use within the boundary sufficient to fully fund the included improvements. The balance of TUMF is transmitted to WRCOG for use in addressing cumulative impacts elsewhere within Western Riverside County. The City treats the DIF component collected within the NPRBBD in a similar way to ensure the local circulation network outside the program boundaries is adequately addressed. Table 1-5 of the Project-specific TIA included in Appendix L lists each facility identified within the NPRBBD, the General Plan roadway classification and the current estimated construction cost for the facilities. The listed facilities identified within the NPRBBD provide additional benefit by providing alternate truck routes in the City of Perris. NPRBBD fees are paid as a one-time fee payment to the City prior to the issuance of a building permit, and include the TUMF and City DIF fees. The NPRBBD fee funds certain facilities described in the TUMF and DIF programs and additional improvements to supplement the TUMF and DIF network.

City of Perris Development Impact Fee (DIF) Program

In 1991 the City of Perris created a DIF program to impose and collect fees from new residential, commercial and industrial development for the purpose of funding roadways and intersections necessary to accommodate City growth as identified in the City's General Plan Circulation Element. This DIF program has been successfully implemented by the City since 1991 and was updated in 2014. The City updated the DIF program to add new roadway segments and intersections necessary to accommodate future growth and to ensure that the identified street improvements would operate at or above the City's LOS performance threshold. The City's DIF program includes facilities that are not part of, or which may exceed improvements identified and covered by the TUMF program. As a result, the pairing of the regional and local fee programs provides a more comprehensive funding and implementation plan to ensure an adequate and interconnected transportation system. Under the City's DIF program, the City may grant to developers a credit against specific components of fees when those developers construct certain facilities and landscaped medians identified in the list of improvements funded by the DIF program.

Similar to the TUMF Program, after the City's DIF fees are collected through the NPRBBD, they are placed in a separate interest-bearing account pursuant to the requirements of Government Code sections 66000 et seq. The timing to use the DIF fees is established through periodic capital improvement programs, which are overseen by the City's Public Works Department. Periodic traffic counts, review of traffic accidents, and a review of traffic trends throughout the City are also periodically performed by City staff and consultants. The City uses this data to determine the timing of the improvements listed in its facilities list. The City also uses this data to ensure that the improvements listed on the facilities list are

constructed before the LOS falls below the LOS performance standards adopted by the City. In this way, the improvements are constructed before the LOS falls below the City's LOS performance thresholds. The City's DIF program establishes a timeline to fund, design, and build the improvements.

The City has an established, proven track record with respect to implementing the City's DIF Program. Many of the intersections included in the Project-specific TIA are at various stages of widening and improvement based on the City's collection of DIF fees. Under DIF program, as a result of the City's continual monitoring of the local circulation system, the City insures that DIF improvements are constructed prior to when the LOS would otherwise fall below the City's established performance criteria.

Fair Share Contribution

Project mitigation may include a combination of fee payments to established programs (e.g., TUMF, NPRBBD, and/or DIF), construction of specific improvements, payment of a fair share contribution toward future improvements, or a combination of these approaches. Improvements constructed by development may be eligible for a fee credit or reimbursement through the program, where appropriate (to be determined at the City's discretion). When off-site improvements are identified with a minor share of responsibility assigned to proposed development, for improvements not funded through payment of the NPRBBD, the approving jurisdiction may elect to collect a fair share contribution or to require the development to construct improvements. Improvements included in a defined program, i.e., NPRBBD, and constructed by development may be eligible for a fee credit or reimbursement through the program where appropriate.

City of Perris General Plan Policies

The purpose of the Circulation Element of the General Plan is to provide for a safe, convenient and efficient transportation system for the city. In order to meet this objective, the Circulation Element has been designed to accommodate the anticipated transportation needs based on the estimated intensities of various land uses within the region. The Circulation, Conservation, and Open Space elements of the City's General Plan identify goals and policies related to vehicular and non-vehicular transportation and circulation. The goals and policies applicable to the proposed Project and a discussion of the Project's consistency is provided under the discussion of Threshold a, below.

4.13.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of State CEQA Guidelines, a project will normally have a significant adverse environmental impact on transportation if it will:

- a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- b. 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); and
- d. Result in inadequate emergency access.

4.13.4 ENVIRONMENTAL IMPACTS

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to transportation and circulation. These Standards and Guidelines (summarized below) are incorporated as part of the Project and are assumed in the analysis presented in this section. The chapters/section numbers provided correspond to the PVCCSP chapters/sections (City of Perris, 2018).

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

4.2 On-Site Standards and Guidelines

Vehicular Access and On-Site Circulation (Section 4.2.2.2)

- **Establish Truck Routes.** Truck routes are required for trucks having a maximum gross weight of 5 tons. These routes (Figure 3.0-3 in the PVCC Specific Plan) should avoid conflicts with established communities and be separated from passenger vehicles where possible.
- **Minimize Vehicular Conflict.** Site access should promote safety, efficiency, convenience, and minimize conflict between employee/customer vehicles and large trucks by creating separate access points when possible.
- **Access Points Easily Identifiable.** Entry drives should be easily identifiable through the use of enhanced landscaping and special pavements (accent colors, textures, and patterns). Landscaped medians should be provided on major project entrances. Signage should also be used to identify customer and service entrances. Driveways used exclusively for deliveries or loading activities are excluded.
- **Shared Access.** The City encourages shared driveway access whenever possible. Reciprocal ingress/egress access easements shall be provided for circulation and parking to facilitate ease of vehicular movement between properties and to limit the number of vehicular access points to adjoining streets.
- **Emergency Vehicle Access.** Design of primary drive aisles must allow for emergency vehicle access. Typically, this requirement is a minimum of 20 feet. However, applicants are encouraged to check with the City's Fire Marshall.
- **Visual Link to Building and Entry.** A well-designed entry should offer a visual link to the building and entry through the use of business signs, paving, and landscaping.
- **Primary Entry Drive/Location of Building.** The primary entry drive should be oriented toward the main entrance of the building.
- **Entry Median.** A landscaped center median shall be provided at the primary entrance for sites requiring 100 or more parking spaces.

- **Landscape Parkways/Sides of Entry.** Landscaped parkways shall border both sides of all entry drives to create a sense of arrival.
- **Dual Axle Entrances.** Entrances used primarily or solely by dual axle vehicles shall provide a minimum 50-foot radius curb returns.
- **Avoid Back-up onto Public Streets.** To avoid back-up onto public streets, entry drive approaches shall avoid conflict points such as parking stalls, internal drive aisles, or pedestrian crossings. Final determination of the driveway approach length shall be determined by the Planning Manager and the City Engineer after consideration of the project site design.
- **Minimize Interactions.** Minimize interactions between trucks, cars and pedestrians by having separate circulation. The placement of loading areas and dock facilities should minimize the interaction between trucks and visitor/customer automobiles. Access to loading and delivery areas should be separated from parking areas to the greatest extent feasible.
- **Consideration of Large Truck Maneuverability.** The design and location of loading facilities should take into consideration the specific dimensions required for the maneuvering of large trucks and trailers into and out of loading positions at docks or in stalls and driveways.

Pedestrian Access and On-Site Circulation (Section 4.2.2.3)

- **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 [Americans with Disabilities Act (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).

Off-Site Design Standards and Guidelines (from Chapter 5.0 of the PVCC Specific Plan)

5.2 Off-Site Vehicular Circulation

5.2.1 Roadway Standards and Guidelines

- **Roadway Design Requirements.** All intersection spacing and/or access openings shall be in compliance with Table 5.0-1 (in the PVCCSP), or as otherwise approved by the City Engineer.
- **Cross-Sections.** All Specific Plan roads shall be constructed per the standard cross-sections shown in Figure 5.0-1 (in the PVCCSP).

- **Lane Requirements/Expanded Intersections.** All Specific Plan roads shall be constructed per the lane requirements outlined in Table 5.0-2 (in the PVCCSP) and provide expanded intersections as depicted in Figures 5.0-2a to Figure 5.0-2d (in the PVCCSP). Any roadway with classification of a Secondary Arterial and greater that intersects with an Expressway, Arterial, Secondary Arterial or Collector, shall provide additional turn lanes as outlined in Table 5.0-2 (in the PVCCSP).
- **Intersection Sight Distance.** Intersections, including driveways, shall comply with required site distance as shown in Figure 5.0-3 (in the PVCCSP).
- **Traffic Signal Interconnect.** Each project will be required to install signal interconnect conduit and pull boxes on project frontage located along roadways designated as Secondary Arterials or greater. Pull boxes shall be spaced a minimum of 500 feet apart. All conduit shall be 2-inch galvanized steel conduit. All conduits placed under paving shall be installed without open cutting. All pull boxes shall be No. 5. Pull Boxes in the unimproved areas that are not protected by curb and gutter shall be traffic bearing type.
- **No Textured Pavement Within City Right-of-Way.** No textured pavement accents will be permitted within the City maintained rights-of-way, unless part of a gateway, mid-block crossing of [Metropolitan Water District] Trail or otherwise approved by the City Engineer.

5.2.2 Truck Route Standards and Guidelines

- **Establish Truck Routes.** Routes in which large trucks will travel will be established in order to avoid conflicts with established residential communities and to improve the flow of traffic through the City. Refer to Figure 3.0-3 (in the PVCCSP) for City established truck routes.
- **Interim Truck Routes.** Ramona Expressway and Perris Boulevard are designated truck routes. However, the City will encourage truck traffic to use Indian Avenue, Redlands Avenue, and Harley Knox Boulevard in lieu of Ramona Expressway and Perris Boulevard. It is anticipated that the truck route designation will be lifted from Ramona Expressway and Perris Boulevard as these other routes become established.¹
- **Large Turning Radius.** A 35-foot turning radius shall be provided at intersections along truck route. A minimum 40-foot turning radius shall be required for driveways with 50 feet being the preferred driveway turning radius.
- **Concrete Intersections and Approaches.** All major intersections and approaches shall be paved with concrete for a minimum distance of 150 feet on either side of the centerline.
- **Increased Stacking.** Typical stacking distance at turn pockets is 200 feet. Increased stacking distance in turn pockets along the truck routes shall be provided as deemed necessary by the City and City Engineer.
- **Acceleration/Deceleration Lanes.** Acceleration, deceleration, as well as right-turn lanes may be required to prevent traffic congestion at truck entrances and exits.

¹ Ramona Expressway is no longer a designated truck route in the PVCCSP.

- **Mitigation Measures.** Each development project shall comply with the on-site and off-site street improvement recommendations and mitigation measures outlined in the subsequent traffic studies for each individual project, or as otherwise interpreted by the City Engineer.

5.3 Off-Site Non-Vehicular Circulation

5.3.1 *Trail Standards and Guidelines*

- **MWD Trail.** All development projects adjacent to the MWD Trail shall coordinate with the City of Perris Parks and Recreation Department to determine the development plan for the trail.
 - Segment 1 – Greenbelt (Figure 5.0-6a) Segment 1 will eventually link the Perris Valley Channel trail with the MWD trail. There is an existing roadway dedication for Sinclair Street all the way to the channel. Because the road will not serve future circulation, it will be used to supplement the MWD trail with a greenbelt and a circular like turnaround.
 - Segment 2 – Sinclair Terminus Segment 2 anticipates the terminus of Sinclair Street in the event the access needs to be provided to existing parcels between the channel and Redlands Avenue. The City will determine if the road section or the length of extension necessary to service property owners to the south of Redlands can be eliminated. If the road section is eliminated, the section for Segment 1 will apply.
- **Perris Valley Storm Channel Trail.** The Perris Valley Channel Trail (Figure 5.0-7) shall be constructed in accordance with the San Jacinto River Plan. Project proponents may either construct according to the said guidelines or contribute funds in lieu of construction. Projects adjacent to the future trail shall set aside enough land to ensure its proper development.

The PVCCSP EIR includes mitigation measures relevant to the analysis of potential traffic and circulation impacts. These are restated below, incorporated as part of the Project, and assumed in the analysis presented in this section. These mitigation measures will be included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project. It should be noted that although no longer required for purposes of CEQA, mitigation measure MM Trans 7 requires project-level traffic impact studies to be prepared for individual development projects in the PVCCSP area. The City of Perris continues to require the Project-level traffic analysis to inform the development of conditions of approval for individual projects implementing the PVCCSP. This requirement has been met through the preparation of the TIAs included in Appendix L of this EIR.

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 includes the NPRBBD (North Perris Road and Bridge Benefit District). The fees shall be collected and utilized as needed by the City of Perris to construct the improvements necessary to maintain the required level of service and build or improve roads to their build-out level.

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 will 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 6 *Each implementing development project that is located adjacent to the MWD Trail shall coordinate with the City of Perris Parks and Recreation Department to determine the development plan for the trail.*

MM Trans 8 *Proposed mitigation measures resulting from project-level traffic impact studies shall be coordinated with the NPRBBD to ensure that they are in conformance with the ultimate improvements planned by the NPRBBD. The applicant shall be eligible to receive proportional credits against the NPRBBD for construction of project level mitigation that is included in the NPRBBD.*

Project Design Features

As required by PVCCSP EIR mitigation measure MM Trans 1, the site-adjacent roadway and access improvements as well as the truck access recommendations for each driveway that were recommended in the TIA (refer to Sections 1.7 through 1.11) have been incorporated into the Project (refer to the discussion provided in Section 3.6.3, Vehicular and Non-Vehicular Circulation and Parking, of this EIR). These improvements are identified below as PDFs. They are included in this section to ensure that they are implemented and tracked through the Project's Mitigation Monitoring and Reporting Program. Additionally, as required by PVCCSP EIR mitigation measure MM Trans 8, required improvements shall be coordinated with the NPRBBD to ensure that they are in conformance with the ultimate improvements planned by the NPRBBD.

Roadway Improvements

PDF 13-1 *Prior to the issuance of occupancy permits, the Project proponent shall have constructed the roadway improvements outlined below. These roadways shall be improved consistent with the PVCCSP and the City of Perris General Plan's Circulation Element. The Project*

shall improve these roadways as required by the final Conditions of Approval for the proposed Project and applicable City of Perris standards

- Construct Redlands Avenue to its ultimate half-section width as a Secondary Arterial (94-foot right-of-way) between Morgan Street and Rider Street.
- Construct Rider Street to its ultimate half-section width as a Secondary Arterial (94-foot right-of-way) between Redlands Avenue and the Project's eastern boundary.
- Construct Morgan Street at the half-section width for a Local Street (60-foot right-of-way) between Redlands Avenue and the Project's eastern boundary. A cul-de-sac shall be constructed at the eastern end of Morgan Street.

Site Access Improvements

PDF 13-2 Prior to the issuance of occupancy permits, the Project proponent shall have constructed the site adjacent access improvements outlined below, consistent with the PVCCSP and the City of Perris General Plan's Circulation Element. The proposed Project shall improve these roadways as required by the final Conditions of Approval for the proposed Project and applicable City of Perris standards

- **Redlands Avenue & Morgan Street.** Install a stop control on the westbound approach and construct the intersection with the following geometrics:
 - *Northbound Approach (Redlands Avenue):* One left turn lane with a minimum of 100 feet of storage and one shared through-right turn lane.
 - *Southbound Approach (Redlands Avenue):* One left turn lane with a minimum of 100 feet of storage and one shared through-right turn lane.
 - *Eastbound Approach (Morgan Street):* One left turn lane with 100 feet of storage and one shared through-right turn lane.
 - *Westbound Approach (Morgan Street):* One shared left-through-right turn lane.

There are two other full access driveways proposed along Morgan Street (Driveway A and Driveway B). Both Driveway A and Driveway B shall have a stop control on the driveway (minor approach) with free flow along Morgan Street. Each approach shall accommodate a single lane in each direction to facilitate site access.

- **Redlands Avenue & Driveway 1.** Install a stop control on the westbound approach and construct the intersection with the following geometrics:
 - *Northbound Approach (Redlands Avenue):* One through lane and one shared through-right turn lane.
 - *Southbound Approach (Redlands Avenue):* One through lane.
 - *Westbound Approach (Driveway 1):* One right turn lane.

- **Redlands Avenue & Sinclair Street.** Install a stop control on the eastbound and westbound approaches and construct the intersection with the following geometrics:
 - *Northbound Approach (Redlands Avenue):* One through lane, and one shared through-right turn lane.
 - *Southbound Approach (Redlands Avenue):* One left turn lane with a minimum of 100 feet of storage and one shared through-right turn lane.
 - *Eastbound Approach (Sinclair Street):* One shared left-through-right turn lane.
 - *Westbound Approach (Sinclair Street):* One right turn lane.
- **Redlands Avenue & Driveway 2.** Install a stop control on the westbound approach and construct the intersection with the following geometrics:
 - *Northbound Approach (Redlands Avenue):* One through lane and one shared through-right turn lane.
 - *Southbound Approach (Redlands Avenue):* One left turn lane with a minimum of 100 feet of storage and one through lane.
 - *Westbound Approach (Driveway 2):* One shared left-right turn lane.
- **Redlands Avenue & Driveway 3.** Install a stop control on the westbound approach and construct the intersection with the following geometrics:
 - *Northbound Approach (Redlands Avenue):* One through lane and one shared through-right turn lane.
 - *Southbound Approach (Redlands Avenue):* One through lane.
 - *Westbound Approach (Driveway 3):* One right turn lane.
- **Redlands Avenue & Rider Street.** Install a traffic signal and construct the intersection with the following geometrics:
 - *Northbound Approach (Redlands Avenue):* One left turn lane with a minimum of 100 feet of storage and one shared through-right turn lane.
 - *Southbound Approach (Redlands Avenue):* One left turn lane with a minimum of 100 feet of storage and one shared through-right turn lane.
 - *Eastbound Approach (Rider Street):* One left turn lane with a minimum of 100 feet of storage, one through lane, and one right turn lane.
 - *Westbound Approach (Rider Street):* One left turn lane with a minimum of 100 feet of storage, one through lane, and one shared through-right turn lane.

- **Driveway 4/Wilson Avenue & Rider Street.** Install a traffic signal and construct the intersection with the following geometrics:
 - *Northbound Approach:* One shared left-through-right turn lane.
 - *Southbound Approach (Driveway 4):* One shared left-through-right turn lane.
 - *Eastbound Approach (Rider Street):* One left turn lane with a minimum of 100 feet of storage, one through lane, and one right turn lane.
 - *Westbound Approach (Rider Street):* One left turn lane with a minimum of 100 feet of storage, one through lane, and one shared through-right turn lane.

On-site traffic signing and striping should be implemented in conjunction with detailed construction plans for the Project area. Sight distance at each Project access point shall be reviewed with respect to City of Perris and PVCCSP sight distance standards at the time of preparation of final grading, landscape, and street improvement plans.

Truck Access and Circulation

PDF 13-3 Prior to the issuance of occupancy permits, the Project proponent shall construct the truck access roadway improvements at the following driveways to provide the necessary curb radii to accommodate a truck with a 67-foot wheelbase (WB-67):

- Morgan Street at Redlands Avenue shall provide a 70-foot radius on the northeast curb.
- Driveway 1 at Redlands Avenue shall provide a 45-foot radius on the northeast curb.
- Sinclair Street at Redlands Avenue shall provide a 60-foot radius on the northeast curb.
- Driveway 2 at Redlands Avenue shall provide a 45-foot radius on the northeast curb.

Trip Generation and Distribution

Trip generation represents the amount of traffic that is attracted to and produced by a development, and is based upon the specific land uses planned for a given project. Trip generation rates for the Project are shown in Table 4.13-1, Trip Generation Summary, together with the trip generation summary illustrating daily and peak hour trip generation estimates. The trip generation rates used for this analysis are based on information collected by the Institute of Transportation Engineers (ITE) as provided in their Trip Generation Manual (10th Edition, 2017). For purposes of this analysis, ITE land use code 154 (High-Cube Transload and Short-Term Storage Warehouse) has been used to derive site-specific trip generation estimates. Passenger car equivalent (PCE) factors were applied to the trip generation rates for heavy trucks (i.e., large 2-axles, 3-axles, 4 or more axles). PCEs allow the typical “real-world” mix of vehicle types to be represented as a single, standardized unit (e.g., the passenger car). A PCE factor of 1.5 has been applied to 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for 4+-axle trucks to estimate each turning movement. These factors are consistent with the values recommended for use in the San

Bernardino County CMP and are in excess of the factor recommended for use in the County of Riverside traffic study guidelines. Additional information regarding the breakdown of trips by vehicle mix is provided in the TIA included in Appendix L. Project actual daily and peak hour trip generation by vehicle type is shown in Table 4.13-1. The Project is estimated to generate a total of approximately 1,926 trip-ends per day, with 115 AM peak hour trips and 142 PM peak hour trips.² This represents approximately 0.5% percent of the projected daily trips associated with the PVCCSP.

Table 4.13-1 Trip Generation Summary (Actual Vehicles)

Project Trip Generation Rates									
Land Use ¹	ITE LU Code	Units ²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
High-Cube Transload Short-Term Warehouse without Cold Storage ^{3,4}	154	TSF	0.062	0.018	0.080	0.028	0.072	0.100	1.400
Passenger Cars (69.2% AM, 78.3% PM, 67.8% Daily)			0.043	0.013	0.056	0.022	0.056	0.078	0.949
2-Axle Trucks (5.14% AM, 3.62% PM, 5.38% Daily)			0.003	0.001	0.004	0.001	0.003	0.004	0.076
3-Axle Trucks (6.38% AM, 4.49% PM, 6.66% Daily)			0.004	0.001	0.005	0.001	0.003	0.004	0.093
4-Axle+ Trucks (19.28% AM, 13.59% PM, 20.16% Daily)			0.012	0.003	0.015	0.004	0.010	0.014	0.282
Project Trip Generation									
Project	Quantity	Units ²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
High-Cube Transload Short-Term Warehouse without Cold Storage	1,373.449	TSF							
Passenger Cars:			60	18	78	31	77	108	1,304
Truck Trips:									
2-axle:			5	2	7	2	5	7	106
3-axle:			6	2	8	2	5	7	128
4+-axle:			17	5	22	6	14	20	388
- Net Truck Trips (Actual Vehicles)			28	9	37	10	24	34	622
TOTAL NET TRIPS (Actual Vehicles)			88	27	115	41	101	142	1,926

¹Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition (2017).

²TSF = thousand square feet

³Vehicle Mix Source: Institute of Transportation Engineers (ITE), High-Cube Warehouse Vehicle Trip Generation Analysis (October 2016).

⁴Truck Mix Source: SCAQMD Warehouse Truck Trip Study Data Results and Usage (2014)

Normalized % - Without Cold Storage; 16.7% 2-Axle trucks, 20.7% 3-Axle trucks, 62.6% 4-Axle trucks

Source: (Urban Crossroads, 2020a)

² This trip generation estimate is based on an anticipated maximum building square footage of 1,373,449 sf as presented in the NOP for this EIR and consistent with the Project description at the time the TIA was prepared. However, the site plans for the Rider 2 and Rider 4 buildings were subsequently revised resulting in a reduction in the anticipated maximum building square footage (currently proposed to be 1,352,736 sf). The higher square footages for Rider 2 and Rider 4 have been evaluated for the purposes of this TIA in order to account for any minor changes that may occur to the building area as part of the final design.

Trip distribution is the process of identifying the probable destinations, directions, or traffic routes that would be utilized by Project traffic. The potential interaction between the planned land uses and surrounding regional access routes are considered in order to identify the route where the Project traffic would distribute. The Project trip distribution was developed based on anticipated travel patterns to and from the Project site for both passenger cars and truck traffic. The trip distribution patterns are illustrated on Figure 4.13-6, Project (Passenger Car) Trip Distribution, and Figure 4.13-7, Project (Truck) Trip Distribution based on truck traffic using the I-215/Harley Knox Boulevard interchange. Figure 4.13-8 and Figure 4.13-9 present the passenger car and truck distribution using the future I-215/Placentia Avenue interchange.

The assignment of traffic from the Project to the adjoining roadway system is based on Project trip generation, trip distribution, and the arterial highway and local street system improvements that would be in place by the time of initial occupancy of the Project. Based on the identified Project traffic generation and trip distribution patterns, Project ADT volumes for the weekday and peak hour volumes are shown on Exhibit 4-4, Project Only (PCE) Traffic Volumes, of the respective TIAs included in Appendix L of this EIR.

Impact Analysis

Threshold a Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

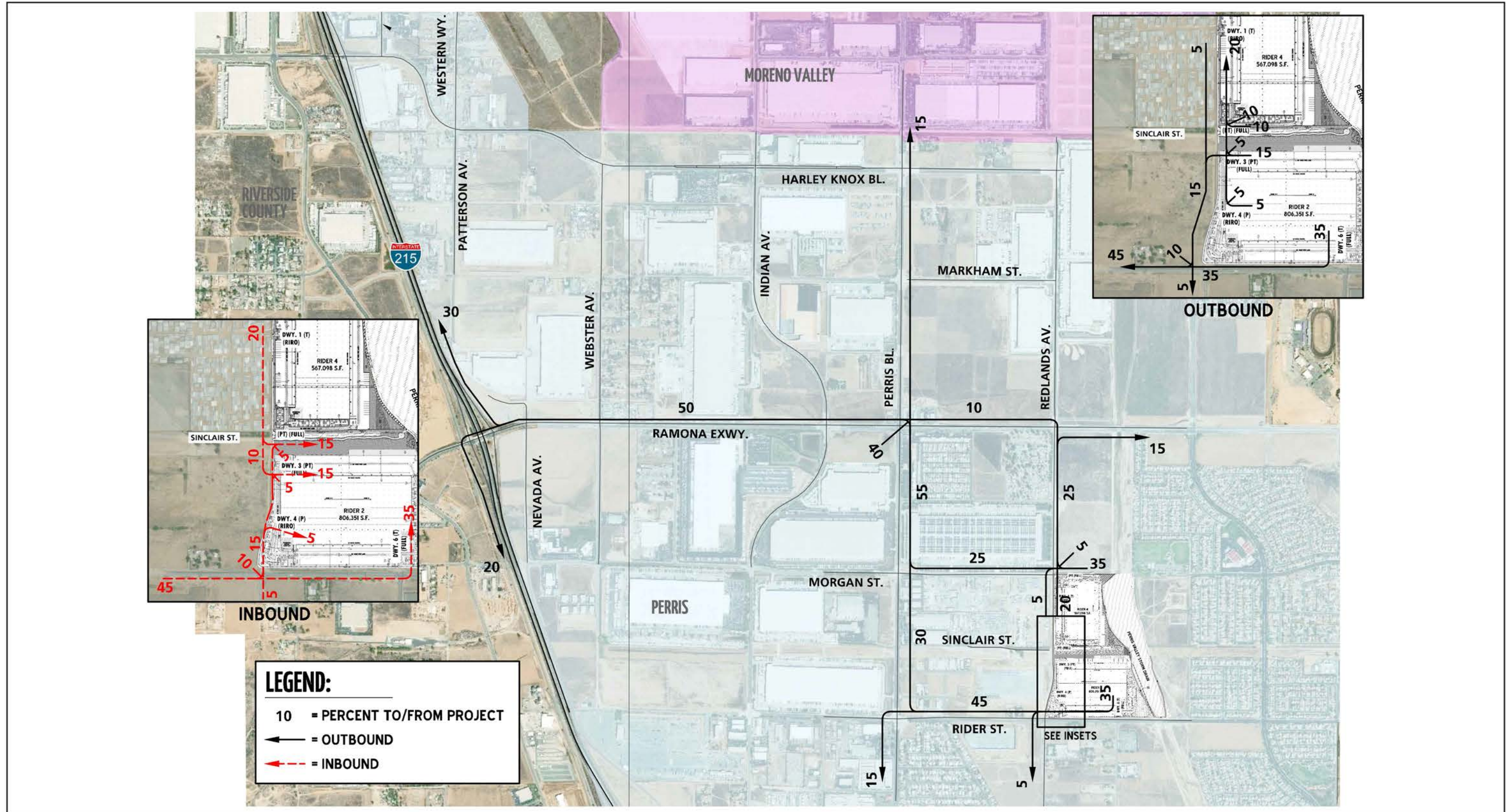
Regional

SCAG 2016-2040 RTP/SCS

SCAG's 2016 RTP/SCS and Connect SoCal seek to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. Table 4.11-1, SCAG Policy Consistency Analysis, in Section 4.11, Land Use and Planning, of this EIR, addresses the Project's consistency with the 2016-2040 RTP/SCS and Connect SoCal. As demonstrated through this analysis, implementation of the Project would be consistent with the goals and policies of SCAG's regional planning program, including the goals related to vehicular and non-vehicular circulation, and goods movement.

Riverside County CMP

The RCTC monitors the CMP roadway network system to minimize LOS deficiencies. Pursuant to SB 743, LOS is no longer the basis for determining whether a Project has a significant impact pursuant to CEQA. However, for informational purposes, the Project's consistency with the CMP is being discussed. Within the project study area, I-215 is recognized as a key transportation facility within the CMP system. Although the California Department of Transportation (Caltrans) utilizes LOS D as their stated threshold, the RCTC has adopted LOS E as the minimum standard for intersections and segments along the CMP System of Highways and Roadways.

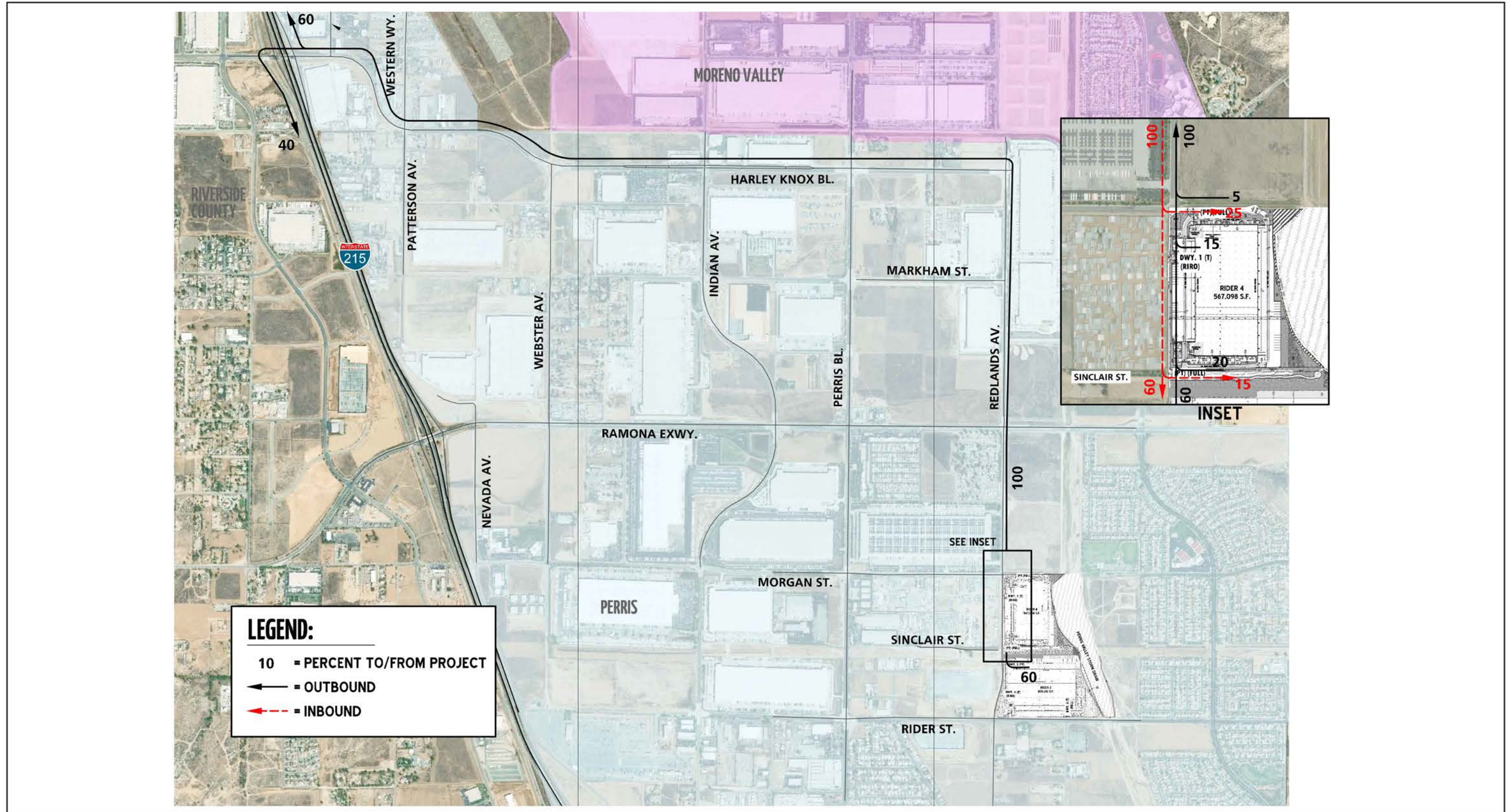


Source(s): Urban Crossroads (02-26-2020)

Figure 4.13-6



**Project (Passenger Car) Trip Distribution with
 Harley Knox Boulevard/I-215 Interchange**

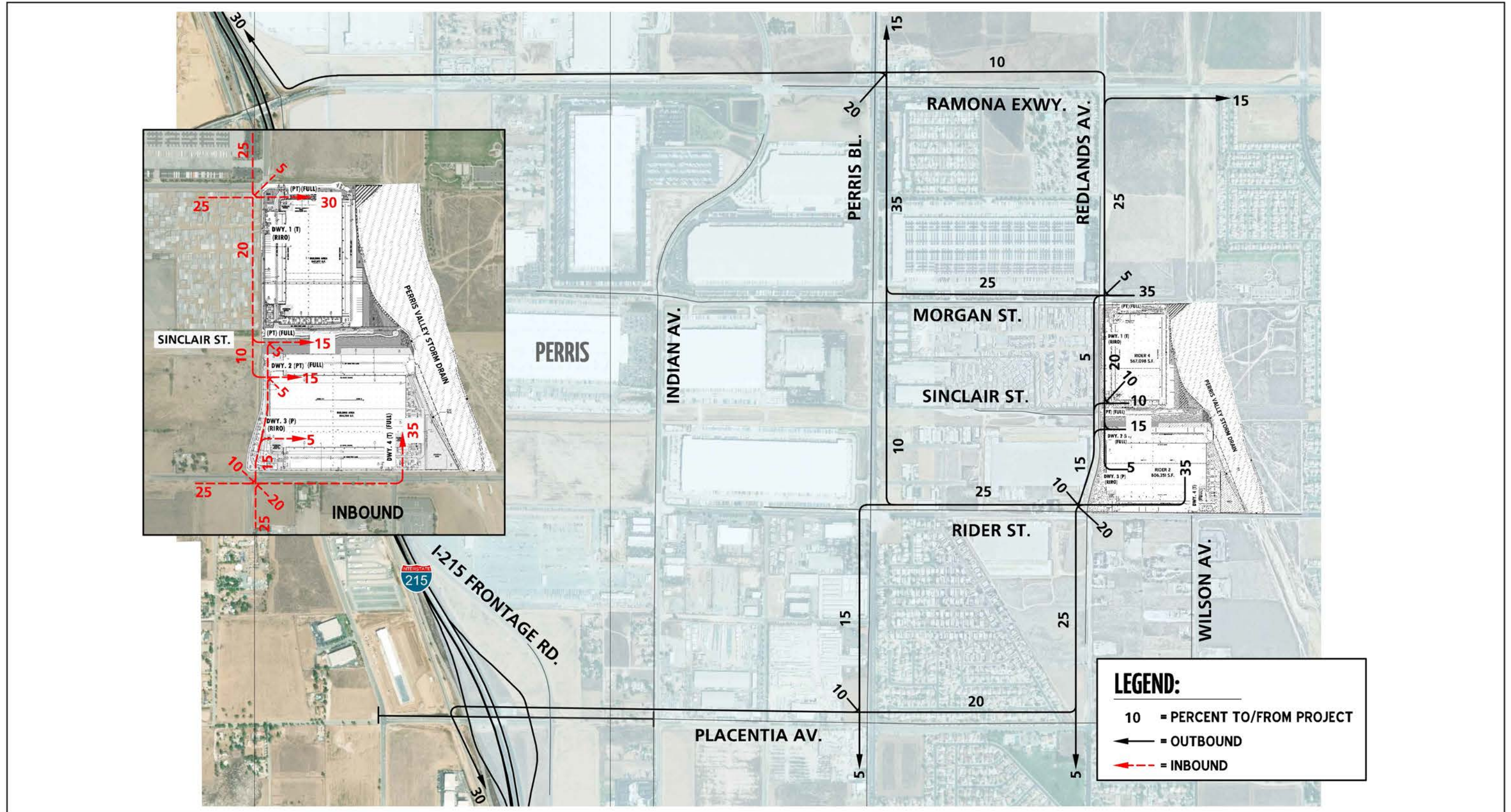


Source(s): Urban Crossroads (02-26-2020)

Figure 4.13-7



**Project (Truck) Trip Distribution with
 Harley Knox Boulevard/I-215 Interchange**

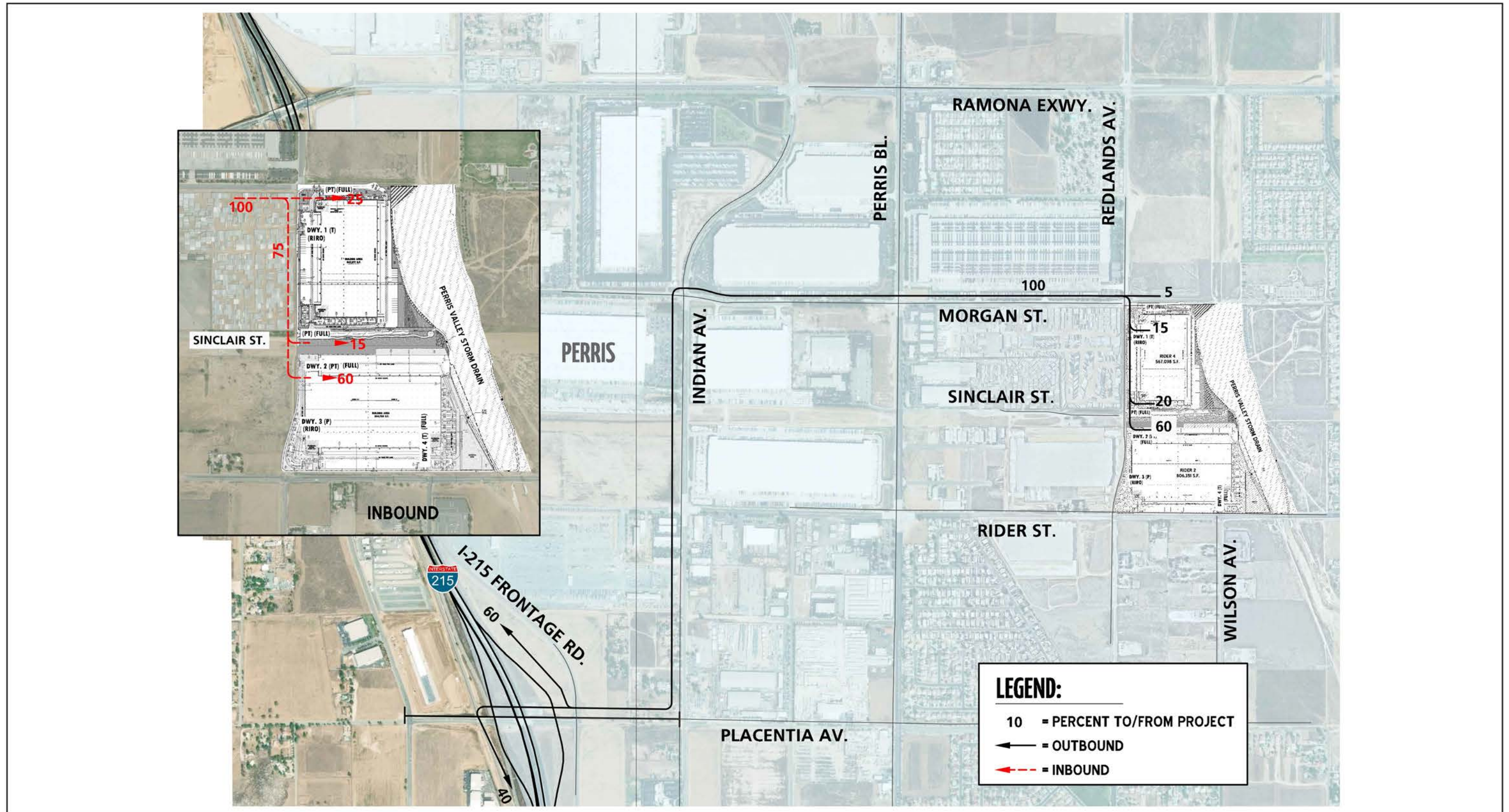


Source(s): Urban Crossroads (02-26-2020)

Figure 4.13-8

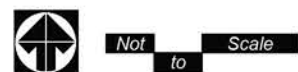


Project (Passenger Car) Trip Distribution with
 Placentia Avenue/I-215 Interchange



Source(s): Urban Crossroads (02-26-2020)

Figure 4.13-9



**Project (Truck) Trip Distribution with
 Placentia Avenue/I-215 Interchange**

The Project would contribute traffic to freeway mainline segments along I-215, and the Project TIAs analyzed the northbound and southbound segments of I-215 north and south of the existing interchanges at Harley Knox Boulevard and Ramona Expressway, and the north and south of the planned future interchange at Placentia Avenue. As identified in the Project TIAs, various segments of I-215 freeway mainline segments would operate at an unacceptable LOS F. However, this condition occurs without and with the Project, and the Project does not cause the freeway mainline segments to operate at an unacceptable LOS. The Project would not conflict with the Riverside County CMP.

It should be noted that *The Project Study Report/Project Development Support in Riverside County on I-215 and SR-60 between Nuevo Road (I-215) & I-215/SR-60 Junction and Box Springs Road (I-215) & Day Street (SR-60)*, also known as the I-215 North Project, includes the construction of an high-occupancy vehicle (HOV) lane in each direction of the I-215 Freeway between Nuevo Road and Box Springs Road within the existing median. At this time, the I-215 North Project has no anticipated start or completion date. Further, Caltrans has no near-term fee programs or other improvement programs in place to address the deficiencies caused by development projects on the State highway system freeway facilities.

City of Perris

City of Perris General Plan

As presented in Section 4.11, Land Use and Planning, of this EIR, the Project does not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect, including policies outlined in the City’s General Plan. Table 4.13-2 restates the consistency analysis for the General Plan goals and policies that address the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Table 4.13-2 City of Perris General Plan Consistency Analysis

GENERAL PLAN GOAL	CONSISTENCY ANALYSIS
Circulation Element	
<p>Goal I. A comprehensive transportation system that will serve projected future travel demand, minimize congestion, achieve the shortest feasible travel times and distances, and address future growth and development in the City.</p>	<p>No Conflict. As described in Section 3.0 of this EIR, the Project would include roadway improvements, including driveways into the building sites, to accommodate Project circulation needs. Specifically, Sinclair Street (between the Rider 2 and Rider 4 buildings, Morgan Street (north of the Rider 4 site), and Rider Street (south of the Rider 2 site) would be improved. Traffic-control improvements would also be implemented as part of the Project. Redlands Avenue, which is along the western boundaries of the Rider 2 and Rider 4 sites, was recently constructed by the Project Applicant as part of the Rider 3 building.</p>
<p>Policy I.A. Design and develop the transportation system to respond to concentrations of population and employment activities, as designated by the Land Use Element and in accordance with the designated Transportation System, Exhibit 4.2, Future Roadway Network (refer to City of Perris General Plan).</p>	<p>No Conflict. Although not required to determine whether the Project would have a significant transportation impact pursuant to CEQA, a traffic analysis was prepared for the Project (included in Appendix L of this EIR) and was used to determine the improvements that are required to be constructed to implement the PVCCSP’s Circulation Plan, consistent with the City’s General Plan for the Future Roadway Network. The Project incorporates the</p>

GENERAL PLAN GOAL	CONSISTENCY ANALYSIS
	improvements recommended by the traffic analysis (refer to project design feature PDF 13-1 through PDF 13-3) and would construct the PVCCSP roadways that are adjacent to the building sites, as required.
<p>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-n-ride facilities, and pedestrian facilities.</p>	<p>No Conflict. Roadway improvements included as part of the Project would be constructed according to the standards of the City of Perris and would include sidewalks on each roadway, and an on-street bikeway along Rider Street, as required by the PVCCSP. As previously identified, the Project area is located near an existing bus routes along Rider Street (RTA Route 41), transportation corridors, and I-215, which provide the potential for service to park-and-ride facilities. It should be noted that in compliance with PVCCSP EIR mitigation measure MM Trans 4, the Project Applicant coordinated with RTA regarding provision of bus stops in the vicinity of the Project, in coordination with the Rider 1 and Rider 3 buildings that were recently completed. At the direction of RTA, bus stops have been installed on Redlands Avenue and Rider Street in the vicinity of the Project area as part of the Project Applicant’s Rider 1 and Rider 3 building projects. These bus stops would also serve the Project and no additional bus stops are required.</p>
<p>Goal II. A well planned, designed, constructed, and maintained street and highway system that facilitates the movement of vehicles and provides safe and convenient access to surrounding developments.</p>	<p>No Conflict. In addition to the construction of roadway improvements as required by the PVCCSP, the Project developer would pay applicable traffic mitigation fees (e.g., NPRBBD fees (refer to PVCCSP EIR mitigation measure MM Trans 3), which include the TUMF and City of Perris DIF, or fair share payments, that would fund additional traffic improvements to General Plan roadways in the Project area and would go toward the maintaining roadway infrastructure in the Project area.</p>
<p>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.</p>	<p>No Conflict. The Project maintains the existing roadway network and provides roadway improvements based on the demand determined by the traffic analysis prepared for the Project.</p>
<p>Goal III. To financially support a transportation system that is adequately maintained.</p>	<p>No Conflict. Refer to the consistency analysis for Circulation Goals I and II, and associated policies, above.</p>
<p>Policy III.A Implement a transportation system that accommodates and is integrated with new and existing development and is consistent with financing capabilities.</p>	<p>No Conflict. The Project incorporates a transportation system that builds upon and improves the existing roadways in the area to support existing development and the Project.</p>
<p>Goal IV. Safe and convenient pedestrian access and non-motorized facilities between residential neighborhoods, parks, open space, and schools that service those neighborhoods.</p>	<p>No Conflict. As required by the PVCCSP, the Project would include sidewalks as part of the roadway improvements constructed adjacent to the building sites. These sidewalks would help to complete pedestrian pathways along roadways that currently do not have sidewalks or curbs and gutters.</p>
<p>Goal V. Efficient goods movement.</p>	<p>No Conflict. The Project involves the development of two warehouses located approximately 1.6 miles from and with near-direct access to I-215, which would allow easy access for inbound and outbound trucks. Additionally, the Project area is located approximately 2.6 miles southeast of March Inland Port (MIP), which is used primarily for the distribution of goods.</p>

GENERAL PLAN GOAL	CONSISTENCY ANALYSIS
<p>Policy V.A. Provide for safe movement of goods along the street and highway system.</p>	<p>No Conflict. All roadway construction and improvements would be completed according to the standards and requirements set forth by the City of Perris and in coordination with the City Engineer to ensure that roadways are safe and efficient.</p>
<p>Goal VII. A transportation system that maintains a high level of environmental quality.</p>	<p>No Conflict: The Project includes roadway improvements required by the PVCCSP and the Project developer would pay traffic fees and fair share fees for roadway improvements to improve the flow of traffic in the Project area by limiting delay times at intersections and improving the overall flow of traffic.</p>
<p>Policy VII.A. Implement the Transportation System in a manner consistent with Federal, State, and local environmental quality standards and regulations.</p>	<p>No Conflict. This EIR has been prepared in accordance with the State CEQA Guidelines. Further, although not required to determine transportation impacts pursuant to CEQA, a traffic analysis has been prepared for the Project in accordance with the guidance provided by the City of Perris, the County of Riverside, and Caltrans. Through the required public review of the EIR, local, State, and federal agencies can comment on the Project and its consistency with the applicable standards and regulations. By considering the comments of these agencies in the EIR and throughout the development process, the Project would maintain consistency.</p>
<p>Goal VIII. Enhanced traffic flow, reduced travel delay, reduced reliance on single-occupant vehicles, and improved safety along the City and State roadway system.</p>	<p>No Conflict. The Project design incorporates improvements to site-adjacent local roadways based on the projection of future traffic resulting from the Project. These improvements—as well as the required payment of fees to provide funding for any necessary improvements to local roadways—would ensure that traffic delays are minimized and safety is increased. Additionally, refer to the consistency analysis for Goal IX below, which addresses non-vehicular transportation.</p>
<p>Conservation Element</p>	
<p>Goal IX. Encourage project designs that support the use of alternative transportation facilities.</p>	<p>No Conflict. As discussed previously, the PVCCSP Standards and Guidelines incorporate pedestrian paths and sidewalks into roadway design, and provide for trails to accommodate non-motorized forms of transportation throughout the PVCCSP area. The Project would include roadway and sidewalk improvements, implementation of a linear trail north of the MWD easement between the Rider and Rider 4 sites, which would meet the intent of the MWD trail anticipated by the PVCCSP EIR mitigation measure MM Trans 6), an on-street bikeway along Rider Street, and replacement of the existing regional trail that currently extends along the eastern side of the PVSD Channel and connects to the regional trail system. The Project would not preclude construction of the MWD trail in future should the City and MWD agree to provisions for the construction of this facility on MWD property. Additionally, as required by PVCCSP EIR mitigation measure MM Trans 5, bicycle parking and bicycle racks would be provided at the proposed building sites to encourage employees to bicycle to work.</p> <p>The Project does not include any elements that would impede access to public transit, including transit routes along Rider Street and Redlands Avenue. It should be noted that bus</p>

GENERAL PLAN GOAL	CONSISTENCY ANALYSIS
	stops have been installed on Redlands Avenue and Rider Street in the vicinity of the Project area as part of the Project Applicant's Rider 1 and Rider 3 building projects.
Open Space Element	
Goal II. Establish comprehensive trail system for pedestrian, bicycle, and equestrian use.	No Conflict. As shown in Figure 3.0-5, Trails Plan, of the PVCCSP, a planned regional trail is located along the PVSD Channel in the Project area. The Project would include 15-foot wide access roads on each side of the PVSD Channel. The eastern access road would also serve as a regional trail, consistent with the PVCCSP, and would replace the existing trail that currently extends along the eastern side of the PVSD Channel and connects to Morgan Park northeast of the Project area. The Project also would support local non-vehicular circulation. As noted in Section 3.0, Project Description, roadway construction and improvements would include a 55-foot wide greenbelt, south of the Rider 4 site. The greenbelt would include a meandering decomposed granite trail, landscaping and a circular like turnaround.

Perris Valley Commerce Center Specific Plan

As identified previously, the PVCCSP includes various Standards and Guidelines for the provision of on-site and off-roadway improvements, vehicular and non-vehicular circulation, and site access. As discussed through the analysis presented in this section, the Project would be developed in accordance with the PVCCSP Standard and Guidelines.

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

Additional Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

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

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

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

As required by the City's TIA Guidelines, an initial screening assessment utilizing the City of Perris VMT Scoping Form was completed for the Project and is included in Appendix L of this EIR. The Project area is within a low VMT area, and the Project's VMT per employee (10.66) would be less than the established citywide average (based on 2012 base year projections from the Riverside Transportation Analysis Model (RIVTAM)). Therefore, the Project would have a less than significant impact on VMT. No mitigation is required and no additional VMT modeling is required to reduce the Project's impact on VMT. (Urban Crossroads, 2020c)

Additional Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant.

Threshold c Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?

The analysis contained in the PVCCSP EIR concludes that implementation of the PVCCSP and the subsequent implementation of development and infrastructure projects would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Construction-related Hazards

As described in Section 3.6.8, Construction Activities, of this EIR, construction activities for the PVSD Channel improvements, including the Rider Street bridge replacement, would overlap with construction

activities for the Rider 2 and Rider 4 buildings. During the Project's construction phase, traffic to-and-from the subject property would be generated by activities such as construction employee trips, the use/delivery of heavy equipment, and the overlap of construction-related activities. Vehicular traffic associated with construction employees would be substantially less than daily and peak hour traffic volumes generated during Project operational activities because construction activities typically begin and end outside of the peak hours. Accordingly, a majority of the construction employees would not be driving to/from the Project area during hours of peak congestion. It is estimated that construction worker vehicles are forecast to generate approximately 22 peak hour trips (Urban Crossroads, 2020a).

Construction materials would be delivered to the site throughout the construction phase – mostly outside of peak hours – based on need and would not occur on an everyday basis. Heavy equipment would be utilized within the Project area during the construction phase. As most heavy equipment is not authorized to be driven on public roadways, most equipment would be delivered and removed from the site via flatbed trucks (sometimes with multiple pieces of equipment delivered to the site on a single trip). As with the delivery of construction materials, the delivery of heavy equipment to the Project area would not occur on a daily basis but would occur periodically throughout the construction phase based on need. Trucks delivering materials and equipment would follow designated truck routes and would not increase traffic-related hazards during construction.

As described in project design features PDF 13-1 and PDF 13-2, the Project would implement site-adjacent roadway improvements and Project driveways along Morgan Street, Rider Street and Sinclair Street. Additionally, Project driveways would be constructed along Redlands Avenue. Construction activities associated with the Project could result in the temporary closure of traffic lanes or roadway segments along Redlands Avenue and Rider Street during various construction activities associated with the construction of the Rider 2 and Rider 4 buildings, including, but not limited to, accommodating the delivery of construction materials and equipment; providing adequate site access for construction vehicles and equipment; and installation of utility infrastructure. Morgan Street and Sinclair Street are not through streets, and would ultimately only provide access to the Rider 4 site; however, these roadways would have intersections with Redlands Avenue. Further, the construction of infrastructure would coincide with roadway improvements, which would include road or lane closures, as well as the presence of construction workers and equipment on public roads. The reduction of roadway capacity, the narrowing of traffic lanes, and the occasional interruption of traffic flow on streets associated with Project-related construction activities could pose hazards to vehicular traffic due to localized traffic congestion, decreased turning radii, or the condition of roadway surfaces.

Project-specific construction plans are finalized on a project-by-project basis by the City and are required to ensure adequate traffic flow. At the time of approval of any site-specific plans required for the construction of roadway facilities or infrastructure, the Project Applicant would be required to implement measures that would maintain traffic flow and access. Notably, mitigation measure MM Air-2 in Section 4.2, Air Quality, of this EIR, requires that a traffic control plan be provided to the City. The traffic control plan would describe in detail safe detours and provide temporary traffic control during construction activities for the project to minimize congestion and disruption. To reduce traffic congestion, the plan would include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on and off site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to

improve traffic flow. The Project would have a less than significant impact during construction associated with increased hazards.

Operational Hazards

The Project includes the construction of roadway and site access improvements (refer to project design features PDF 8-1, PDF 8-2, and PDF 8-3). Roadway and circulation improvements have been designed in compliance with Standards and Guidelines set forth in Sections 4.2 and 5.2 of the PVCCSP and in compliance with PVCCSP EIR mitigation measures MM Trans 1 (construct circulation improvements as required by the PVCCSP Circulation Plan) and MM Trans 2 (adequate sight distance). The design of roadways must provide adequate sight distance and traffic-control measures. This provision is normally realized through roadway design to facilitate roadway traffic flows. Roadway improvements in and around the Project area would be designed and constructed to satisfy all City and Caltrans requirements for street widths, corner radii, and intersection control. They would also incorporate design standards tailored specifically to Project access requirements.

Exhibit 1-5 of the TIA included in Appendix L illustrates the inbound and outbound truck access for the site at each of the Project driveways. The appropriate curb radii have been determined so that trucks would have sufficient space to execute turning maneuvers. The ingress and egress of trucks at each Project driveway is consistent with the truck trip distribution assumed in the TIA. Project design feature PDF 8-3 identifies the curb radii that would be implemented to accommodate a truck with a 67-foot wheelbase (WB-67) (53-foot trailer) for each Project driveway. The Project is anticipated to construct curb and gutter improvements and sidewalks along the site frontage on Morgan Street, Redlands Avenue, and Rider Street.

The intersection corner sight distance has been evaluated in the TIA for each Project driveway on Redlands Avenue and Rider Street. Sight distance is the continuous length of highway ahead visible to the driver. At unsignalized intersections, intersection sight distance must provide a substantially clear line of sight between the driver of the vehicle waiting on the minor road (driveway) and the driver of an approaching vehicle. For the purposes of the Project analysis, a 7 ½ second criterion has been applied to the outside travel lanes in either direction to provide the most conservative sight distance. The 7 ½ second criterion allows waiting vehicles to either cross all lanes of through traffic by turning left or cross the near lanes by turning right without requiring through traffic to radically alter their speed.

The County's Standard No. 821 states that the minimum intersection corner sight distance on a roadway with a speed limit of 40 miles per hour is 440-feet. As shown on Exhibit 1-6 of the TIA included in Appendix L, it is anticipated that the minimum 440-foot intersection sight distance could be accommodated on Redlands Avenue (Secondary Arterial with a posted speed limit of 40 miles per hour) in both the northbound and southbound directions, and on Rider Street.

The County's Standard No. 821 states that the minimum intersection corner sight distance on a roadway with a speed limit of 45 miles per hour is 495-feet. As shown on Exhibit 1-6 of the TIA included in Appendix L, it is anticipated that the minimum 495-foot intersection sight distance could be accommodated on Rider Street (Secondary Arterial with a posted speed limit of 45 miles per hour) in both the eastbound and westbound directions.

Adequate visibility for vehicular and pedestrian traffic can be provided at each Project driveway by limiting sight obstructions within the limited use area. As required by PVCCSP EIR mitigation measure MM Trans 2, sight distance would 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.

Adherence to applicable City requirements would ensure the proposed Project would not include any sharp curves or dangerous intersections or driveways. In the absence of a roadway design hazard, no impact would occur during operation. Therefore, no mitigation is required.

Additional Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This conclusion is consistent with the PVCCSP EIR Initial Study.

Threshold d Would the Project result in inadequate emergency access?

As discussed above under Threshold c, construction activities that may temporarily restrict vehicular traffic flow would be required to implement adequate measures to facilitate the passage of vehicles through/around any required lane or road closures (refer to mitigation measure MM Air 2 in Section 4.2, Air Quality, requires that a traffic control plan be provided to the City). Site-specific activities such as temporary construction activities are finalized on a project-by-project basis by the City and are required to ensure adequate emergency access.

As further described in Section 3.6.2 of this EIR, the Project involves implementation of regional drainage improvements for the PVSD Channel, which also require replacement of the Rider Street bridge over the PVSD Channel. Should the Rider Street bridge construction occur in two stages, east-west access would be maintained continuously during the construction period, and adequate emergency access would be provided. Construction of the Rider Street bridge in one stage, which is expected to last approximately 9 months, would require a full closure of Rider Street, preventing east-west travel across the PVSD Channel. Detours to get to the east or west side of the PVSD Channel would be accommodated by routes using Ramona Expressway to the north or Orange Avenue to the south (refer to Figure 4.9-2 in Section 4.9, Hazards and Hazardous Materials, of this EIR). A travel time analysis was prepared to determine additional travel time needed during a full closure of Rider Street between Redlands Avenue and Evans Road. The local fire station and American Medical Response (AMR) station are located west of the PVSD Channel; Riverside County Fire Department Station 90 is located at 333 Placentia Avenue, and AMR North Perris station is located at 3553A North Perris Boulevard. Both sites are relatively close to the proposed Rider Street bridge closure. The detour route is 1 to 1.5 miles longer and 2 to 3 minutes longer than with Rider Street open when traveling under normal conditions. With the proposed detour, the travel time for Station 90 would increase from 3 to 6 minutes and the travel time for the AMR station would increase from 4 to 6 minutes. The detour routes appear to be viable routes to the east side of the Rider Street closure. (Webb, 2020) With the availability of a detour route that effectively accommodates east-west travel while Rider Street is closed, construction of the Project and temporary closure of the Rider Street bridge would not result in inadequate emergency access and this impact would be less than significant.

The roadway improvements that would occur as a part of the Project would improve traffic circulation in the area, in accordance with the PVCCSP. These would also improve the ability of emergency vehicles to access the Project area and surrounding properties. The Project driveways have been designed to accommodate large trucks with trailers that would be used for the distribution of goods to and from the site. As discussed above, adequate turn radii and sight distance would be provided. Thus, the Project would provide ample vehicular access for emergency vehicles. The Project is required to comply with the City's development review process including review for compliance with all applicable fire code requirements for access to the site. The Project has been reviewed by the Riverside County Fire Department to determine the specific fire requirements applicable to the Project and has been designed in compliance with these requirements. This ensures that the Project would provide adequate emergency access to and from the site. Therefore, impacts are less than significant and no mitigation is required.

Based on the proposed Project design and with required adherence to City requirements for emergency vehicle access, impacts would be less than significant.

Additional Project-Level Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

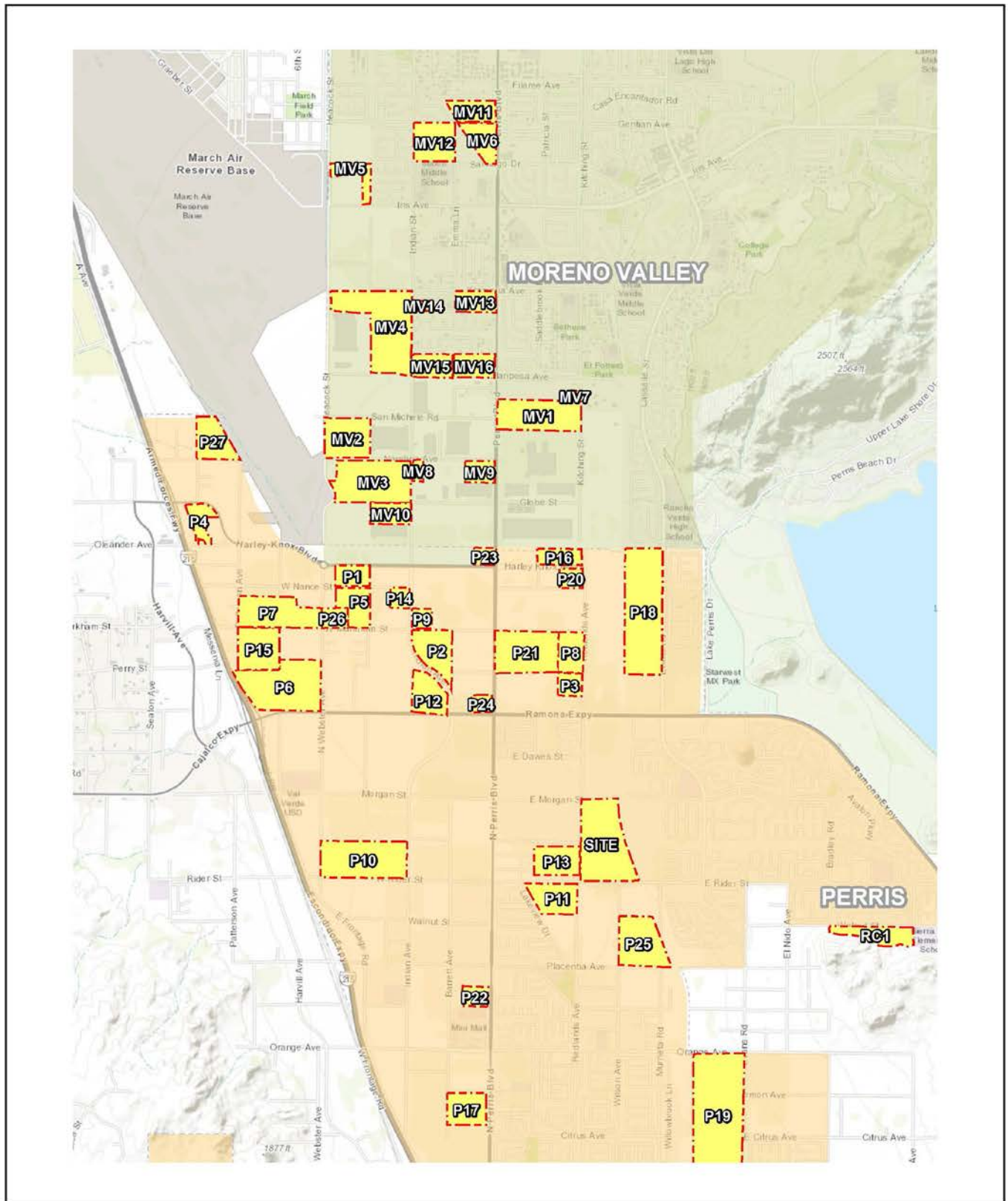
Project impacts would be less than significant. This conclusion is consistent with the PVCCSP EIR Initial Study.

4.13.5 CUMULATIVE IMPACTS

During preparation of the TIA, adjacent jurisdictions of the County of Riverside and the City of Moreno Valley were contacted to obtain the most current list of cumulative projects from their respective jurisdictions. Figure 4.13-10, *Cumulative Development Location Map*, depicts the cumulative development projects identified. As shown, the majority of the projects are in the City of Perris, including with the PVCCSP. Project in the City of Moreno Valley are north of Harley Knox Boulevard.

As identified in the analysis presented under Threshold a, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Cumulative development projects would be reviewed for consistency with adopted programs, plans, ordinances, or policies, including but not limited to the SCAG RTP/SCS, City of Perris General Plan, and the PVCCSP, as applicable. Even if cumulative development projects are in conflict, the Project would not contribute to a cumulative impact and thus would not cumulatively considerable because the Project does not conflict with a program, plan, ordinance, or policy addressing the circulation system, as identified through the analysis presented in this section.

As discussed under Threshold b, the Project is consistent with land use designations in both the City of Perris's General Plan and with the PVCCSP. The Project is therefore deemed consistent with the SCAG RTP/SCS. As such, no additional cumulative analysis is required, and the Project's cumulative impact relative to VMT is considered less than significant. The Project would not result in a cumulatively considerable contribution to a significant cumulative VMT impact.



Source(s): Urban Crossroads (02-26-2020)

Figure 4.13-10



Cumulative Development Location Map

Cumulative development projects would contribute to construction traffic and associated temporary lane and road closures during construction. However, the potential construction-related traffic impacts resulting from the Project would be less than significant with implementation of PVCCSP EIR mitigation measure MM Air 2, which requires the preparation of a traffic control plan. The requirement for a traffic control plan during construction is a standard requirement for construction projects in the City.

As with the Project, cumulative development in the vicinity of the Project would be required to construct roadways and Project access driveways in accordance with applicable PVCCSP Standards and Guidelines ensure impacts are less than significant. Further, providing sufficient emergency access during construction and operation is also a standard requirement. The Project would not result in a cumulatively considerable contribution to a significant cumulative impact associated with traffic-related hazards or emergency access.

4.13.6 REFERENCES

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SCAG, 2020. *Connect SoCal, The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments*. May 7, 2020. Available at <https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx>

Urban Crossroads, 2020b. *IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Traffic Impact Analysis*. May 15, 2020. Included in Appendix L of this EIR.

Urban Crossroads, 2020c. *IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Focused Traffic Assessment (With I-215 Freeway/Placentia Avenue Interchange)*, City of Perris. May 15, 2020. Included in Appendix L of this EIR.

Urban Crossroads, 2020c. *IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project VMT Scoping Form for Land Use Projects*. June 22, 2020. Included in Appendix L of this EIR.

Webb Associates, 2020. *Rider Street Bridge Detour Travel Time Analysis*. April 29, 2020.

4.14 **TRIBAL CULTURAL RESOURCES**

This section identifies the potential for the Project area and site-adjacent off-site improvement areas (collectively referred to herein as the “Project area”) to contain tribal cultural resources, and evaluates the Project’s potential impacts to tribal cultural resources. The analysis in this Section is based primarily on the following two site-specific reports. References used to prepare this section are listed in Section 4.14.6, References.

- *A Phase I Cultural Resources Survey for the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project, Perris California*, prepared by Brian F. Smith and Associates, Inc. (BFS) (Cultural Resources Survey) (September 2020) (Appendix D of this Environmental Impact Report [EIR])
- *A Class III Section 106 (NHPA) Study for the Perris Valley Storm Drain Channel Widening Project, Perris, Riverside County, California*, prepared by Brian F. Smith and Associates, Inc. (PVSD Channel Section 106 Study) (June 2020)¹

The Cultural Resources Survey was prepared in compliance with Perris Valley Commerce Center Specific Plan (PVCCSP) EIR mitigation measure MM Cult 1. The Confidential Appendix for the Cultural Resources Survey and the PVSD Channel Section 106 Study are not appended to this Environmental Impact Report (EIR). While they are on file with the City of Perris Planning Division, they are not available for public review. Any review may only be conducted by a qualified professional ethically required to keep the data in the reports from public dissemination and ultimately protecting resources from any possible adverse impacts. This level of confidentiality is referenced in Section 6354.10 of the *California Government Code*.

No comments regarding cultural resources were raised at the EIR scoping meeting. In its Notice of Preparation (NOP) comment letter, the Native American Heritage Commission (NAHC) provided information about Assembly Bill (AB) 52 and Senate Bill (SB) 18, which address requirements for consultation with Native American tribes related to tribal cultural resources; and, provided standard guidance on the scope of the analysis of potential impacts to archaeological resources and tribal cultural resources. As further discussed below, the City of Perris has completed Native American consultation required by AB 52; SB 18 is not applicable to the Project as it does not include a General Plan Amendment or Specific Plan Amendment.

The City of Perris sent the NOP for this EIR to the following Native American tribes: Pechanga Band of Luiseño Mission Indians (Pechanga Tribe), Soboba Band of Luiseño Indians, Rincon Band of Luiseño Indians, Agua Caliente Band of Cahuilla Indians, Desert Cahuilla Indians, Luiseño Indians, and Morongo Band of Mission Indians. The Rincon Band of Luiseño Indians was the only tribe to respond to the NOP.

¹ As identified in Section 3.0, Project Description, of this EIR, the proposed improvements to the PVSD Channel entail Phase 1 of a larger channel improvement project, which would ultimately extend north to just past Ramona Expressway and south of Rider Street. Phase 1 of the proposed PVSD Channel improvements, which would be implemented as part of the Project, begin approximately 100 feet north of Morgan Street and extend to just south of Rider Street. As part of processing a Section 404 Permit for the PVSD Channel Widening Project, the United States Army Corps of Engineers (USACE) has requested that a Section 106 archaeological review be conducted as part of their review for the permit for the USACE Area of Potential Effect (APE). The *Class III Section 106 (NHPA) Study for the Perris Valley Storm Drain Channel Widening Project* addresses the larger channel improvement project.

In its NOP comment letter, the Rincon Band of Luiseño Indians requested that an archaeological record search be conducted with a copy of the results provided to the Rincon Band, and requested to be notified of the Public Review Draft of the EIR. The archaeological records search was provided to the tribe, as requested, and the tribe is on the distribution list for the EIR.

4.14.1 EXISTING SETTING

Section 4.4, Cultural Resources, of the PVCCSP EIR, includes a detailed discussion of the environmental setting for cultural resources, including geologic setting, ethnohistoric setting, archaeological setting, and historic setting. This information remains applicable to the Project. Section 4.5, Cultural Resources, of this EIR summarizes Project-specific existing setting information presented in the technical reports prepared for this Project based on the research and field surveys conducted. Following is a summary of information provided in the Project-specific technical reports relevant to tribal cultural resources.

Prehistoric Period

Paleo Indian, Archaic Period Milling Stone Horizon, and the Late Prehistoric Takic groups are the three general cultural periods represented in Riverside County. The discussion of the cultural history of Riverside County presented in the Cultural Resources Survey included in Appendix D references the San Dieguito Complex, Encinitas Tradition, Milling Stone Horizon, La Jolla Complex, Pauma Complex, and San Luis Rey Complex, since these culture sequences have been used to describe archaeological manifestations in the region. The Late Prehistoric component present in the Riverside County area was represented by the Cahuilla, Gabrielino, and Luiseño Indians. Absolute chronological information, where possible, is incorporated in the Cultural Resources Survey to examine the effectiveness of continuing to interchangeably use these terms. Cultural periods are summarized in Section 4.5 of this EIR, and further described in the Cultural Resources Survey included in Appendix D; the protohistoric and ethnohistoric periods, which are particularly relevant to tribal cultural resources are summarize below.

Protohistoric and Ethnohistoric Periods

The Project area is located within the traditional cultural territory occupied by the Luiseño. When contacted by the Spanish in the sixteenth century, the Luiseño occupied a territory bounded on the west by the Pacific Ocean, on the east by the Peninsular Ranges mountains at San Jacinto (including Palomar Mountain to the south and Santiago Peak to the north), on the south by Agua Hedionda Lagoon, and on the north by Aliso Creek in present-day San Juan Capistrano. The Luiseño occupied sedentary villages most often located in sheltered areas in valley bottoms, along streams, or along coastal strands near mountain ranges. Villages were located near water sources to facilitate acorn leaching and in areas that offered thermal and defensive protection. Villages were composed of areas that were publicly and privately (by family) owned. Publicly owned areas included trails, temporary campsites, hunting areas, and quarry sites. The most important food source for the Luiseño was the acorn, and seeds, particularly of grasses, composites, and mints, were also heavily exploited. Hunting augmented this vegetal diet; hunting implements included the bow and arrow. The Luiseño had a well-developed basket industry. Baskets were used in resource gathering, food preparation, storage, and food serving. Social groups within the Luiseño nation consisted of patrilinear families or clans, which were politically and economically autonomous. Several clans comprised a religious party, or nota, which was headed by a chief who organized ceremonies and controlled economics and warfare (BFSA, 2020).

The Project area is also located in the region known to have been occupied by the Cahuilla Indians. The Cahuilla occupied territory that included the San Bernardino Mountains, Orocopia Mountain, and the Chocolate Mountains to the west, Salton Sea and Borrego Springs to the south, Palomar Mountain and Lake Mathews to the west, and the Santa Ana River to the north. The Cahuilla differ from the Luiseño and Gabrielino in that their religion is more similar to the Mohave tribes of the eastern deserts than the Chingichngish religious group of the Luiseño and Gabrielino. Cahuilla villages were typically permanent and located on low terraces within canyons in proximity to water sources. These locations proved to be rich in food resources and also afforded protection from prevailing winds. Villages had areas that were publicly owned and areas that were privately owned by clans, families, or individuals. The Cahuilla's use of plant resources is well documented. Plant foods harvested by the Cahuilla included valley oak acorns and single-leaf pinyon pine nuts. The Cahuilla were also hunters; hunting implements included the bow and arrow, throwing sticks, and clubs. The Cahuilla was not a political nation, but rather a cultural nationality with a common language. Clans were composed of 3 to 10 lineages; each lineage owned a village site and specific resource areas. A system of ceremonial hierarchy operated within each lineage (BFSA, 2020).

The territory of the Gabrielino covers much of present-day Los Angeles and Orange counties; however, trade of materials and resources controlled by the Gabrielino extended as far north as the San Joaquin Valley, as far east as the Colorado River, and as far south as Baja California (BFSA, 2020).

Tribal Cultural Resources

As further discussed in Section 4.5, Cultural Resources, of this EIR, BFSA conducted a records search at the Eastern Information Center (EIC) located at the University of California, Riverside, which is the State of California's official cultural resource records repository for the County of Riverside. The results of the records search are provided in the Confidential Appendix of the Cultural Resource Survey. Based on the results of the records search, no tribal cultural resources were located within the Project area. Only one archaeological site within one mile of the Project area was a prehistoric resource (RIV-7758; a bedrock milling site just under one mile north of the Project area).

During preparation of the Cultural Resources Survey, and as further discussed under Threshold "a.ii", below, BFSA contacted various Native American tribes regarding the Project and requested a records search of the Sacred Lands Files (SLFs) from the NAHC. Further, the City of Perris provided a notification of the Project to tribes that have requested such notice, as required by AB 52, and entered into consultation with tribes that requested consultation. The results of this Native American outreach/consultation did not reveal the presence of any tribal cultural resources within the Project area; however, tribes did indicate the potential for tribal cultural resources to be encountered during excavation activities.

As further discussed in Section 4.5, Cultural Resources, of this EIR, BFSA conducted pedestrian surveys of the Project area on August 9 and October 24, 2018. No tribal cultural resources (or any other resources were discovered during the surveys.

4.14.2 EXISTING POLICIES AND REGULATIONS

As previously discussed in Section 4.5, Cultural Resources, of this EIR, Section 4.4 of the PVCCSP EIR provides a complete discussion of the regulatory framework for the analysis of cultural resources,

including regulations relevant to the analysis of tribal cultural resources. The PVCCSP EIR is incorporated by reference. The following discussion addresses regulatory information particularly relevant to tribal cultural resources, including regulation that became effective subsequent to preparation of the PVCCSP EIR.

State

Assembly Bill (AB) 52

California AB 52 (2014) Chapter 532 is an act to amend Section 5097.94 of, and add Sections 21073, 21074, 21080.3.1, 21080.3.2, 21802.3, 21083.09, 21084.2 and 21084.3 to the California Public Resources Code, relating to Native Americans. AB 52 was approved by the Governor on September 25, 2014. AB 52 requires (OPR, 2017):

“a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed Project, if the tribe requested to the lead agency, in writing, be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation, prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project.”

If the tribes desire notification of proposed projects in that area that may cause a substantial adverse change in the significance of a tribal cultural resource, AB 52 requires that Native American tribes send written notice of their geographic areas of traditional and cultural affiliation to CEQA lead agencies. The CEQA lead agency is then required to provide such notification and consult with the tribe(s) if the tribe(s) requests consultation (OPR, 2017).

The provisions listed in AB 52 are applicable to projects that have a notice or preparation or a notice of negative declaration filed on or after July 1, 2015. By requiring the CEQA lead agency to consider the effects relative to tribal cultural resources and to conduct consultation with California Native American tribes, AB 52 imposes a state-mandated program. AB 52 requires the NAHC to provide each California Native American tribe, as defined, on or before July 1, 2016, with a list of all public agencies that may be a lead agency within a geographic area in which the tribe is traditionally or culturally affiliated; the contact information of those agencies; and information on how the tribe may request those public agencies to notify the tribe of projects within the jurisdiction of those public agencies for the purposes of requesting consultation.

As indicated above, the City provided notice of the Project to the Native American tribes that have requested such notice. The results of the AB 52 consultation process are discussed below under the analysis of Threshold “a.ii”, below.

Senate Bill (SB) 18

California SB 18 requires that lead agencies consult with California Native American tribes during the local planning process for the purposes of protecting Traditional Tribal Cultural Places whenever a project proposes to amend or adopt any general plan or specific plan, or designate land as open space. Because the proposed Project does not propose a General Plan Amendment or Specific Plan Amendment, the

City of Perris is not subject to the requirements associated with the SB 18 process for Native American consultation.

California Health and Safety Code (Sections 7050.5, 7051, and 7054)

These sections collectively address the illegality of interference with human burial remains (except as allowed under applicable sections of the *California Public Resources Code*). These sections also address the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction. Procedures to be implemented are established for: (1) the discovery of Native American skeletal remains during construction of a project; (2) the treatment of the remains prior to, during, and after evaluation; and (3) reburial.

California Public Resources Code (Section 5097.98)

Section 5097.98 of the *California Public Resources Code* addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction. This Section also establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project, and establishes the NAHC to resolve disputes regarding the disposition of such remains. It has been incorporated into Section 15064.5(e) of the State CEQA Guidelines.

California Public Resources Code (Section 5097.5)

Section 5097.5 of the *California Public Resources Code* protects, among other things, paleontological sites on State lands. Sections 4306 and 4309 of the *California Administrative Code* establish authority and processes to protect paleontological resources while allowing mitigation through the permit process. Potential impacts to paleontological resources must be assessed for any project subject to review under CEQA.

Local

City of Perris General Plan Policies

The specific policies outlined in the City's General Plan that are related to tribal cultural resources and the Project are listed in Table 4.11-2, *City of Perris General Plan Consistency Analysis*, of Section 4.11, Land Use and Planning, of this EIR.

4.14.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on tribal cultural resources if it will:

- 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.

4.14.4 ENVIRONMENTAL IMPACTS

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

There are no PVCCSP Standards and Guidelines related to the analysis of tribal cultural resources. As previously discussed, PVCCSP EIR mitigation measure MM Cult 1, which is presented in Section 4.5, Cultural Resources, of this EIR, outlines the requirements for preparation of a Phase I Cultural Resources Study, which has been prepared for the Project and is included in Appendix D of this EIR. Mitigation measures MM 5-1 and MM 5-2, which are restated below under Threshold “a.ii”, implement PVCCSP EIR mitigation measures MM Cult 2 and MM Cult 6, respectively, as subsequently revised by the City of Perris.

Impact Analysis

Threshold a.i Would the Project cause a substantial adverse change in the significance of a tribal cultural resource ...and that is 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)?

As discussed in Threshold “a” in Section 4.5, Cultural Resources, of this EIR, a records search and literature review of the Project area and surrounding areas was undertaken at the EIC at University of California, Riverside. Based on this search and review of existing literature related to cultural and historic resources within the Project area, no tribal cultural resources listed or eligible for listing in the CRHR or in a local register of historical resources were identified. Accordingly, no impact would occur (BFSA, 2020; BFSA, 2020).

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

No Impact would occur.

Threshold a.ii **Would the Project cause a substantial adverse change in the significance of a tribal cultural resource...and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency will consider the significance of the resource to a California Native American tribe.**

Assembly Bill 52 (AB 52), which became effective on July 1, 2015, requires lead agencies to provide notice to Native American tribes that are traditionally and culturally affiliated with the geographic area of a Project if they have requested notice of projects proposed within that area. On November 4, 2019, the City of Perris sent Project notification letters to the following tribes that have requested such notification: Agua Caliente Band of Cahuilla Indians, Torrez Martinez Desert Cahuilla Indians, Luiseño Indians, Morongo Band of Mission Indians, Pechanga Band of Mission Indians, Rincon Band of Mission Indians, and Soboba Band of Luiseño Indians.

The Pechanga Band of Mission Indians and Rincon Band of Mission Indians requested consultation with the City regarding the Project. Much of the written and oral communication between the Native American tribes and the City of Perris is considered confidential in respect to places that have traditional tribal cultural significance (OPR, 2017), and although relied upon in part to inform the preparation of this EIR section, those communications are treated as confidential and are not available for public review. In summary, the City provided information to the tribes, as requested, including the technical reports prepared (including the Cultural Resources Survey provided in Appendix D of this EIR and the Confidential Appendix available at the City), Project plans, and proposed mitigation measures. The tribes indicated they would provide additional information and comments to the City, including comments on the proposed mitigation measures, following review of the requested materials. No further comments have been received from tribes and the City has concluded the tribal consultation process.

In addition to the Native American scoping and consultation conducted pursuant to the requirements of AB 52 by the City of Perris, the City requires consultants completing cultural resources studies to contact NAHC for a sacred land file (SLF) search. A records search of the Sacred Lands Files (SLFs) from the NAHC was requested by BFSA and did not indicate the presence of any sacred sites or locations of religious or ceremonial importance within the subject property. In accordance with the recommendations of the NAHC, BFSA contacted all Native American consultants listed in the NAHC response letter and received 10 responses. The Soboba Band of Luiseño Indians indicated that the area is culturally sensitive and have requested to consult on the Project. The Cabazon Band of Mission Indians indicated that the Project is located outside of the tribe's current reservation boundaries and not within its traditional use area. The Twenty-Nine Palms Band of Mission Indians stated they are unaware of any tribal cultural resources within the Project area. The San Manuel Band of Mission Indians stated that the Project is located outside of the Serrano ancestral territory. The Juaneño Band of Mission Indians, Acjachemen Nation and the San Luis Rey Band of Mission Indians deferred to the Pechanga Band. The Agua Caliente Band of Cahuilla Indians deferred to Soboba and Morongo tribes. The Colorado River Indian Tribes deferred to other affiliated tribes. The Gabrieleño Band of Mission Indians – Kizh Nation declined to participate in this phase of the project. Further, the Cahuilla Band of Indians stated that they do not have knowledge of cultural resources within the Project area, but they would like to consult on the Project and requested on-site monitors be present, as the Project area is located within the tribe's Traditional Land

Use Area. Original correspondence is provided in the Confidential Appendix of the Cultural Resources survey (BFSA, 2020).

As previously discussed, no cultural resources, including tribal cultural resources, were observed during the field survey and no information obtained through Native American consultation or review of applicable records indicates that tribal cultural resources are present within the Project area. Therefore, the Project would not impact any known tribal cultural resources. Although it is not likely, there is a remote possibility that tribal cultural resources may be present beneath the site's subsurface, and if present, could be impacted by deeper ground-disturbing activities associated with Project construction that extend below disturbed soils. There is a greater likelihood of archaeological resources being found in close proximity to historic water bodies such as the PVSD Channel than at other sites within Perris. Notably, as further described in Section 3.0, Project Description, of this EIR, excavation for installation of the Project's utility infrastructure (including water quality basins) would range from 10 to 15 feet below the ground surface. Downstream of the CRA, excavation in the PVSD Channel bottom could extend up to a maximum of 8 feet. The proposed building sites would be subject to shallower excavation; the building sites would be over excavated to a depth of at least 4 feet below existing grade and to a depth of 4 feet below proposed building pad subgrade elevation. Excavated materials from the PVCSD Channel widening would be placed on the building sites to raise the elevation outside of the 100-year flood plain. Without mitigation, construction activities including excavation could encounter unknown tribal cultural resources resulting in a potentially significant impact. Mitigation measure MM 5-1 (restated below), which implements PVCCSP EIR mitigation measure MM Cult 2 as subsequently revised by the City, requires that an archaeological monitor and Luiseño representative be present during initial ground-disturbing activities and identifies steps that would be taken to ensure potential impacts to tribal cultural resources are less than significant. It should also be noted that mitigation measure MM 5-2 (restated below) implements PVCCSP EIR mitigation measure MM Cult 6, as subsequently revised by the City, and identifies actions to be taken in the event that human remains are found.

With implementation of mitigation measures MM 5-1 and MM 5-2, potential impacts to tribal cultural resources would be less than significant.

Additional Project-Level Mitigation Measures

MM 5-1 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 within the Project area or within the off-site Project improvement areas for the identification of any previously unknown archaeological and/or cultural resources. Selection of the archaeologist shall be subject to the approval of the City of Perris Director of Development Services and no ground-disturbing activities shall occur within the Project area 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 Luiseño Indians or the Pechanga Band of Luiseño Indians for a Luiseño tribal representative (observer/monitor) to work along with the consulting archaeologist. This tribal 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 tribal 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 tribal representative(s) should be on-site any time the consulting archaeologist is required to be on-site. Working with the consulting archaeologist, the Luiseño representative(s) shall have the authority to halt, redirect, or divert any activities in areas where the identification, recording, or recovery of Native American resources are on-going.

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

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

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

In the event that archaeological resources are discovered within the Project area 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 undertaken in a manner that avoids destruction or other adverse impacts.

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 tribal representative, determines that monitoring is no longer necessary, monitoring activities can be discontinued following notification to the City of Perris Planning Division.

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

MM 5-2

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

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

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

Level of Significance After Mitigation

Project impacts are less than significant.

4.14.5 CUMULATIVE IMPACTS

This cumulative impact analysis considers development of the Project in conjunction with other development projects and planned development in the City, including the PVCCSP area that have a potential for uncovering tribal cultural resources. As noted previously, the City of Perris conducted Native American consultation with potentially culturally affiliated tribes, as required by AB 52. As a result of this consultation effort, no tribal cultural resources were identified on site, although tribes did indicate a concern over potential impacts to subsurface resources. Other cumulative developments within the region also would have the potential to result in impacts to subsurface tribal cultural resources. Therefore, the Project's potential impacts to subsurface tribal cultural resources represents a cumulatively-considerable contribution to a significant cumulative impact, prior to mitigation. As discussed in Threshold "a.ii," with implementation of mitigation measures MM 5-1 and MM 5-2, the Project's potential impact to tribal cultural resources would be less than significant. Each development proposal received by the City undergoes environmental review and would be subject to the same resource protection requirements as the Project. Neither the Project nor other cumulative developments are expected to result in significant impacts to tribal cultural resources provided site-specific surveys are conducted and required measures to protect the tribal cultural resources are implemented. As such, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact to tribal cultural resources.

4.14.6 REFERENCES

- BFSA, 2020. Brian F. Smith and Associates, Inc. *A Class III Section 106 (NHPA) Study for the Perris Valley Storm Drain Channel Widening Project, Perris, Riverside County, California*. June 10, 2020.
- BFSA, 2020. Brian F. Smith and Associates, Inc. *A Phase I Cultural Resources Survey for the IDI Rider 2 & Rider 4 High Cube Warehouses and PVSD Channel Improvement Project, Perris, California*. September, 2020. Included in Appendix D of this EIR.
- OPR, 2017. State of California Governor's Office of Planning and Research. *Technical Advisory: AB 52 and Tribal Cultural Resources in CEQA*. June 2017. Available at <http://nahc.ca.gov/wp-content/uploads/2017/06/Technical-Advisory-AB-52-and-Tribal-Cultural-Resources-in-CEQA.pdf>

4.15 UTILITIES AND SERVICE SYSTEMS

This section analyzes the existing and planned water (domestic and recycled), wastewater, drainage/storm water, and dry utility infrastructure to serve the proposed Project; water supply; and the impacts that could result from the construction and operation of the proposed Project. Information presented in this section related to water, wastewater, and dry utility infrastructure is based on information from the project application, as provided by the Project Engineer. Information presented in this section related to storm drain infrastructure is based on the Project-specific drainage studies included in Appendix J of this Environmental Impact Report (EIR). A Project-specific Water Supply Assessment was also prepared by the Eastern Municipal Water District and is included in Appendix M of this EIR. references used are listed in Section 4.15.6.

There were no comments regarding utilities or service systems received in response to the Notice of Preparation or during the EIR public scoping meeting.

4.15.1 EXISTING SETTING

Domestic and Recycled Water Service

Under existing conditions, the Project area is vacant and undeveloped, with the exception of the Perris Valley Storm Drain (PVSD) Channel, which extends along the eastern portion of the Project area. The Colorado River Aqueduct (CRA) is located within the Metropolitan Water District (MWD) easement that extends between the Rider 2 and Rider 4 building sites. The CRA is underground in this area and connects to the PVSD Channel within the Project area.

Water service to the Project would be provided by the Eastern Municipal Water District (EMWD). EMWD's water system includes 2,421 miles of transmission and distribution water mains, 4 operating regional water reclamation facilities, and 2 water filtration facilities. EMWD serves a population of approximately 825,000 people and an area that covers 555-square miles (EMWD, 2020a). There is an existing 12-inch domestic water line located in Redlands Avenue that would serve the Rider 4 site, and a 36-inch domestic water line in Redlands Avenue that would serve the Rider 2 site. Additionally, there is an 8-inch recycled water line installed in Redlands Avenue that would serve both the Rider 2 and Rider 4 sites.

Water Supply and Demand

The *Water Supply Assessment Report, IDI Logistics Rider 2 & 4*, prepared by EMWD for the Project is included in Appendix M of this EIR, and includes a detailed discussion of the EMWD's water supply and projected water demands (EMWD, 2019) In summary, EMWD Board of Directors adopted the 2015 UWMP. This plan provides information on EMWD's projected supplies and demands in five-year increments through the year 2040, and reports EMWD's progress on water use efficiency targets as defined in the Water Conservation Act of 2009. The 2015 UWMP shows that the majority of EMWD's existing and future planned demand is to be met through imported water delivered by MWD. Demand for EMWD shown in the 2015 UWMP is projected across the District as a whole and is not project specific. The 2015 UWMP relies heavily on information and assurances contained within MWD's 2015 Urban Water Management Plan (UWMP-MWD) when determining supply reliability.

Consistent with the significant percentage of undeveloped land within EMWD's service area, growth is anticipated to continue throughout the 2015 UMWP's 25-year planning horizon; approximately 40 percent of EMWD's service area is built out. EMWD has 4 sources of water supply: imported water purchased from MWD, local potable groundwater, local desalinated groundwater, and recycled water. An annual breakdown of EMWD's supplies between 2014 and 2018 is shown in Table 2 of the WSA included in Appendix M of this EIR; Table 2 supplements information from the 2015 UWMP. On average from 2010 through 2015, EMWD's water supply portfolio averaged approximately 57 percent of imported water, 10 percent groundwater, 4 percent desalinated groundwater, and 29 percent recycled water, as further discussed below. As future development increases the water demands within EMWD's service area, it is anticipated that the majority of the new demands will be met through additional imported water from MWD. Imported supply sources will be supplemented by local supply projects increasing the desalination of brackish groundwater and the use of recycled water. EMWD also plans to continue its efforts to enhance water use efficiency within its service area.

- **Imported Water.** EMWD is a member agency of MWD and relies on MWD to provide the majority of its potable water supply and a small percent of its non-potable water supply. The northern portion of EMWD's service area is supplied by MWD's Mills Water Filtration Plant (WFP), while the southeastern portion of EMWD's service area is supplied by MWD's Skinner WFP. Untreated water from MWD is treated at EMWD's Perris and Hemet WFPs, and is also delivered directly to a number of agricultural and wholesale customers.

EMWD's water supply reliability is primarily established through MWD, of which EMWD is a member agency. In the 2015 UWMP-MWD, the reliability of water delivery through the State Water Project (SWP) and the CRA was assessed by MWD. MWD determined that its water sources will continue to provide a reliable supply to its member agencies during normal, single-dry, and multiple-dry years during the UWMP planning horizon. Unprecedented shortages are addressed in the Water Shortage Contingency Analysis and Catastrophic Supply Interruption Planning portions of the UWMP-MWD.

- **Groundwater.** The San Jacinto Groundwater Basin is managed under two groundwater management plans. The Hemet/San Jacinto Groundwater Management Plan (HSJ Management Plan) covers the Hemet South, Canyon, San Jacinto Upper Pressure, and Hemet North portion of the Lakeview/Hemet North Groundwater Management Zones. The West San Jacinto Groundwater Basin Management Plan (WSJ Management Plan) covers the Perris North, Perris South, San Jacinto Lower Pressure, Menifee, and the Lakeview portion of the Lakeview/Hemet North Management Zones. Protecting the groundwater supply available to EMWD is an important part of EMWD's planning efforts. EMWD is actively working with other agencies and groups to ensure that groundwater will continue to serve as a reliable water resource in the future. This effort includes the replacement of groundwater extracted beyond a given basin's safe yield. EMWD extracts groundwater within its service area under the HSJ and WSJ Management Plans. Under the HSJ Management Plan, imported water will be recharged in the Hemet/San Jacinto area to support groundwater extractions, while pumping in the WSJ area will remain relatively constant. The groundwater produced by EMWD is allocated towards meeting existing demands. Although the planned expansion of the EMWD's desalination facilities will provide an additional supply of water, the amount will not be sufficient to accommodate the proposed growth within the

District's service area. The majority of the increased water demand will be met by increasing the use of imported water from MWD.

- **Recycled Water.** Recycled water is used extensively in EMWD's service area in place of potable water. This offset to municipal demand comes from recycled water use to irrigate landscape and for industrial purposes. The majority of EMWD's agricultural customers also use recycled water, in some cases, in lieu of groundwater production. EMWD's recycled water supply will expand as the population within EMWD's service area continues to grow. EMWD currently uses all of its recycled water and is limited only by the amount available to serve during peak demands and by system losses. EMWD stores recycled water during low demand periods and does not discharge recycled water. The District anticipates that this will continue even as the supply grows via programs to retrofit additional landscape customers currently using potable water and future indirect potable recharge.

Tables 4 and 5 of the WSA included in Appendix M of this EIR identify the historic and projected customer distribution and water use by the various potable/raw retail customer types. EMWD's primary retail customers for potable/raw water can be divided into residential, commercial, industrial, institutional, and landscape sectors. The residential sector is EMWD's largest customer segment; however, each sector plays a role in the growth and development of EMWD's service area. Based on the water delivery information presented in Table 5 of the WSA, the industrial sector represented 0.4 percent of the overall potable water use in the EMWD's service area (300-acre feet [AF] of the 68,900 AF delivered). This trend is projected to continue with the industrial sector representing 0.4 percent of the potable water projected to be delivered in 2040 (600 AF of the 134,000 AF projected to be delivered).

EMWD also provides wholesale water service to a number of sub-agencies, serves recycled water, and imports water for recharge purposes.

Wastewater Service

EMWD is responsible for all wastewater collection and treatment in its service area and would provide sanitary sewer service to the Project. There are four active regional water reclamation facilities (RWRF) located in the EMWD service area that treat more than 43 million gallons of wastewater each day through 1,813 miles of sewer pipelines (EMWD, 2020b). In 2017, recycled water comprised 35 percent of EMWD's overall water supply portfolio, with recycled water sales exceeding 33,000 AF (EMWD, 2018).

The Perris Valley Regional Water Reclamation Facility (PVRWRF), located on a 300-acre site west of Interstate (I) 215 and south of Case Road, serves a 120-square-mile area including Perris, Menifee, Romoland, Homeland, Winchester and beyond. The plant produces tertiary-treated water and can store more than 2 billion gallons of recycled water for use by surrounding agricultural customers. Wastewater generated by the Project would be treated at the PVRWRF. With the completion of its most recent expansion in 2014, the PVRWRF has the current capacity to treat 22 million gallons per day (mgd) of wastewater, with an ultimate capacity of 100 mgd. Typical daily flows are 13.8 mgd. Therefore, the PVRWRF is poised to meet current and future demands of the region (EMWD, 2016).

There is an existing 33-inch sewer line in Redlands Avenue that would serve both the Rider 2 and Rider 4 sites.

Storm Water Conveyance Facilities

As previously identified, the PVSD Channel, which is the backbone of the City's storm drain system extends along the eastern portion of the Project area. Existing City storm drains flow laterally into the PVSD Channel from east to west and transport the flows through Perris Valley to Reach 3 of the San Jacinto River near I-215. The Perris Valley Channel Master Drainage Plan (PVCMDP) was adopted in October 1989 and addresses drainage needs along the PVSD Channel (RCFC&WCD, 1989). The PVCMDP serves as a long-term guide to the design and construction of the ultimate channel, and identifies the sizing and location of local drainage facilities to be constructed by developers and others within the area. As described in Section 3.6.7, PVSD Channel Improvements, of this EIR, the PVSD Channel will be improved as part of the Project to accommodate the 100-year storm event consistent with the PVCMDP.

The backbone drainage facility for the Rider 2 site is the existing PVCMDP storm drain Lateral A-B in Rider Street, which was designed to account for the fully developed condition of the tributary watershed it serves, including the Rider 2 site. Lateral A-B, which consists of an 8-foot by 7-foot reinforced concrete box (RCB), conveys storm water to the PVSD Channel to the east. Storm water runoff from the Rider 4 site currently sheet flows to the southeast corner of the site and into the PVSD Channel; there are no other storm drain facilities for the Rider 4 site. The planned backbone drainage facility for the Rider 4 site is the PVCMDP storm drain Lateral G-2, which will ultimately flow to the PVSD Channel to the east.

Dry Utilities

Southern California Edison (SCE) supplies electric power to the Project area, and Charter Communications supplies communications and data. The Project would include the installation of on-site dry utility infrastructure to connect with the existing infrastructure. There are existing power poles along the Project perimeter that would be protected in place or relocated as part of the Project. The Project would not require natural gas for operations.

Solid Waste Collection and Disposal

Trash, recycling, and green waste service in the City of Perris is provided by CR&R Waste Services. In addition to normal trash collection, the County of Riverside also sponsors several hazardous waste collection events throughout the year. Waste is transported to the Perris Transfer Station and Materials Recovery Facility located at 1706 Goetz Road, approximately 6 miles south of the Project area. At this facility, recyclable materials are separated from solid wastes. Recyclable materials are sold in bulk and transported for processing and transformation for other uses. Solid waste produced from the Project would be transported to either the Badlands Landfill or El Sobrante Landfill.

The Project area is located approximately 9.6 miles southwest of the Badlands Landfill located at 31125 Ironwood Avenue in the City of Moreno Valley. The landfill is a regional municipal solid waste landfill that is owned and operated by Riverside County. The Badlands Landfill has a total capacity of approximately 34,400,000 cubic yards (cy), is permitted to accept a maximum of 4,800 tons per day, and, as of January 2015, has a remaining capacity of 15,748,799 cy. As of January 2020, the Badlands Landfill was

accepting an average of 2,885 tons per day, approximately 40 percent below the maximum daily capacity. The landfill is projected to reach capacity by January 2022. (CalRecycle, 2020a; CalRecycle, 2020b)

The Project area is located approximately 15 miles northeast of the El Sobrante Landfill located at 10910 Dawson Canyon Road in the City of Corona. The landfill is a regional municipal solid waste landfill that is owned and operated by USA Waste Services of California, Inc. The El Sobrante Landfill has a total capacity of 209,910,000 cy, is permitted to accept 16,054 tons per day, and, as of April 2018, has a remaining capacity of 143,977,170 cy. As of February 2020, the El Sobrante Landfill was accepting an average of 10,058 tons per day, approximately 38 percent below the maximum daily capacity. (CalRecycle, 2020c; CalRecycle, 2020d)

4.15.2 EXISTING POLICIES AND REGULATIONS

Section 4.11 of the PVCCSP EIR provides a complete discussion of the regulatory framework for the analysis of utilities and service systems impacts; regulations particularly relevant to the Project are presented below, and updated, as applicable.

Certain regulations have been addressed in other sections of this EIR: the Clean Water Act, Perris Valley Master Drainage Plan (PVMDP), and PVCMDP are addressed in Section 4.10, Hydrology and Water Quality; and, the California Green Building Standards Code (CalGreen, Part 11 of Title 24, California Code of Regulations) is discussed in Section 4.8, Greenhouse Gas Emissions.

State

State Water Code

Section 13550-13556 of the State Water Code state that local, regional, or state agencies shall not use water from any source of quality suitable for potable domestic use if suitable recycled water is available as provided in Section 13550 of the Water Code.

Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act was established to ensure adequate water supplies are available for future uses. To promote the conservation and efficient use of water, the Act requires local agencies to adopt a water efficient landscape ordinance. The City of Perris implements the model ordinance adopted by the State through regulations contained in Section 19.70, Landscaping, of the City's Municipal Code.

Urban Water Management Planning Act

The Urban Water Management Planning Act (UWMP Act) (*California Water Code*, Section 10610 et. Seq.) was enacted in 1983 and applies to municipal water suppliers, such as the EMWD, that serve more than 3,000 customers or provide more than 3,000 acre-feet per year (AFY) of water. The UWMP Act requires these suppliers to prepare and update their Urban Water Management Plan (UWMP) every five years to demonstrate an appropriate level of reliability in supplying anticipated short-term and long-term water demands during normal, single-dry, and multiple-dry years.

EMWD's 2015 UWMP and MWD's UWMP-MWD, all prepared pursuant to California Water Code Division 6, Part 2.55, Section 10608 (Sustainable Water Use and Demand Reduction) and California Water Code Division 6, Part 2.6, Sections 10608-10656 (Urban Water Management Planning), describe future water demands and future availability of the water supply sources used by EMWD and other retail water agencies operating within the San Jacinto Groundwater Basin. These UWMP documents were used to prepare the WSA for the Project, which is included in Appendix M of this EIR (EMWD, 2019).

The UWMP Act has been modified over the years in response to the State's water shortages, droughts, and other factors. A significant amendment was made in 2009, after the drought of 2007-2009 and as a result of the governor's call for a statewide 20 percent reduction in urban water use by the year 2020. This was the Water Conservation Act of 2009, also known as SB X7-7. This Act required agencies to establish water use targets for 2015 and 2020 that would result in statewide savings of 20 percent by December 31, 2020. Beginning in 2016, retail water suppliers are required to comply with the water conservation requirements in SB X7-7 in order to be eligible for State water grants or loans. Retail water agencies are required to set targets and track progress toward decreasing daily per capita urban water use in their service area, which will assist the State in meeting its 20 percent reduction goal by 2020.

Senate Bill 610

The California Water Code (Water Code) Sections 10910 through 10915 were amended by the enactment of SB 610 in 2002. SB 610 requires an assessment of whether available water supplies are sufficient to serve the demand generated by a proposed project, as well as the reasonably foreseeable cumulative demand in the region over the next 20 years under average normal year, single dry year, and multiple dry year conditions. Under SB 610, a WSA must be prepared in conjunction with the land use approval process associated with a project and is required for any "project" that is subject to CEQA and meets certain criteria relative to size. Relevant to the Project, this includes a proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area. (DWR, 2003)

Because the Project proposes more than 650,000 square feet of floor area for an industrial land use, the Project meets the definition of a "project" pursuant to SB 610. The required WSA has been prepared for the Project and is included in Appendix M of this EIR.

California Integrated Waste Management Act (AB 939)

The California Integrated Waste Management Act of 1989 (AB 939), created the Board now known as California Department of Resources Recycling and Recovery (CalRecycle) and accomplished the following: (1) it required each jurisdiction in the state to submit detailed solid waste planning documents for CalRecycle approval; (2) it set diversion requirements of 25 percent in 1995 and 50 percent in 2000; (3) it established a comprehensive statewide system of permitting, inspections, enforcement, and maintenance for solid waste facilities; and (4) it authorized local jurisdictions to impose fees based on the types or amounts of solid waste generated. Jurisdictions select and implement the combination of waste prevention, reuse, recycling, and composting programs that best meet the needs of their community while achieving the diversion requirements (CalRecycle, 2018a).

Solid Waste Disposal Measurement Act of 2008

The purpose of the Solid Waste Disposal Measurement Act of 2008 (SB 1016) is to make the process of goal measurement (as established by AB 939) simpler, more timely, and more accurate. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population (or in some cases employment) and (2) its disposal, as reported by disposal facilities. Each year CalRecycle calculates each jurisdiction's per capita (per resident or per employee) disposal rates. If business is the dominant source of a jurisdiction's waste generation, CalRecycle may use the per employee disposal rate. Each year's disposal rate will be compared to that jurisdiction's 50 percent per capita disposal target. As such, jurisdictions will not be compared to other jurisdictions or the statewide average, but they will only be compared to their own 50 percent per capita disposal target. Among other benefits, per capita disposal is an indicator that allows for jurisdiction growth because, as residents or employees increase, report-year disposal tons can increase and still be consistent with the 50 percent per capita disposal target. A comparison of the reported annual per capita disposal rate to the 50 percent per capita disposal target will be useful for indicating progress or other changes over time (CLI, 2008).

Waste Reuse and Recycling Act (AB 1327)

The Waste Reuse and Recycling Act (WRRRA) required the California Integrated Waste Management Board (CIWMB) to approve a model ordinance for adoption by any local government for the transfer, receipt, storage, and loading of recyclable materials in development projects by March 1, 1993. The WRRRA also required local agencies to adopt a local ordinance by September 1, 1993, or allow the model ordinance to take effect. The WRRRA requires all development projects that are commercial, industrial, institutional, or marina in nature and where solid waste is collected and loaded, to provide an adequate area for collecting and loading recyclable materials over the lifetime of the project. The area is required to be provided before building permits are issued (CalRecycle, 2018b).

Assembly Bill 341

Assembly Bill (AB) 341 (Chapter 476, Statutes of 2011) directed CalRecycle to develop and adopt regulations for mandatory commercial recycling. The final regulation was approved by the Office of Administrative Law on May 7, 2012. AB 341 was designed to help meet California's recycling goal of 75 percent by the year 2020. AB 341 requires all commercial businesses and public entities that generate four cubic yards or more of waste per week to have a recycling program in place. In addition, multi-family apartments with five or more units are also required to form a recycling program (CalRecycle, 2018c).

City of Perris General Plan Policies

The General Plan Conservation Element identifies goals and policies related to resource conservation. The goals and policies applicable to the Project and a discussion of the Project's consistency is provided in Table 4.11-2, *City of Perris General Plan Consistency Analysis*, in Section 4.11, Land Use and Planning, of this EIR.

4.15.3 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the State CEQA Guidelines, a project will normally have a significant adverse environmental impact on utilities and service systems if it will:

- 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. 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.
- c. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
- 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.

4.15.4 ENVIRONMENTAL IMPACTS

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to utilities and service systems. These Standards and Guidelines (summarized below) are incorporated as part of the Project's Rider 2 and 4 Buildings (the warehouse component) and are assumed in the analysis presented in this section. The chapters/section numbers provided correspond to the PVCCSP chapters/sections. There are no MMs for utilities and service systems included in the PVCCSP EIR.

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

4.2 On-Site Standards and Guidelines

4.2.1 General On-Site Project Development Standards and Guidelines

- Trash and Recyclable Materials
- Waste Hauling
- Easements on MWD Property

4.2.7 Utilities

- Utility Connections and Meters

- Pad-Mounted Transformers and Meter Box Locations
- Electrical, Telephone, CATV and Similar Service Wires and Cables
- Electrical Transmission Lines

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

5.2 Off-Site Vehicular Circulation

5.2.1 Roadway Standards and Guidelines

- Nuisance Storm Flows
- Inverted Median

5.4 Off-Site Infrastructure Standards

5.4.1 Water Standards and Guidelines

- Design Standards
- Water Supply Assessment
- Plan of Service
- Fire Protection
- Irrigation Water Demand
- Conservation Measures
- Inspection

5.4.2 Sewer Standards and Guidelines

- Design Standards
- Plan of Service

5.4.3 Recycled Water Standards and Guidelines

- Recycled Water Candidates
- On-Site Recycled Waterline

5.4.4 Storm Drain Standards and Guidelines

- Riverside County Flood Control and Water Conservation District Standard
- Collect and Discharge Storm Water
- FEMA Floodplain

- On-Site Retention

Landscape Standards and Guidelines (Chapter 6.0 of the PVCCSP)

6.4 Irrigation and Water Conservation

- Compliance with City of Perris Municipal Zoning Code, Chapter 19.70.020, “Water Conservation Requirements for New or Rehabilitated Landscapes.”

Impact Analysis

Threshold a Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment facilities or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Threshold b Would the project result in a determination by the wastewater treatment provider which serves or may serve the project determined that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?

The PVCCSP EIR concludes that development in the PVCCSP area would result in increased water demand and wastewater generation. PVCCSP EIR also concludes that development of the PVCCSP would result in increased impervious surface and storm water flows in the Specific Plan area. However, implementation of project-specific water and wastewater facilities and storm drain facilities and adherence to standard EMWD and City conditions relative to the design and installation of new water and wastewater infrastructure and/or connections to existing infrastructure would ensure that no significant impacts would occur.

Further, the PVCCSP EIR concludes that the Perris Valley Regional Water Reclamation Facility (PVRWRF) has sufficient capacity to treat the wastewater generated within the PVCCSP area and impacts would be less than significant.

Domestic and Recycled Water Facilities

Water demand associated with the proposed Rider 2 and Rider 4 buildings would consist of interior plumbing devices (i.e., sinks, toilets, faucets), outdoor landscape irrigation, and various industrial process systems. The PVSD Channel component of the Project would not result in increased water demand. As previously stated, the Project would receive water services from EMWD.

Based on the water usage assumptions presented in Table 4.11-D, *Perris Valley Commerce Center Project Water Usage*, of the PVCCSP EIR, the Project is anticipated to have a water demand of approximately 48.8 AFY¹. This represents approximately 1.8 percent of the projected water usage for the entire Specific Plan area, which is 2,671.5 AFY (City of Perris, 2011). Based on the Project-specific WSA

¹ 65 acres x 0.75 AFY (water demand factor for commercial/industrial land uses)

prepared for the Project, the water demand would be 45 AFY, slightly less than anticipated in the PVCCSP EIR.

The development of the Project would require construction of new water distribution lines within the Project area's development footprint. The final design and sizing of on-site facilities would accommodate the anticipated water demand (landscaping, potable, and fire flow) based on the proposed land use. These new water distribution lines would connect to existing facilities that are located within the Project area and within adjacent roadways. Specifically, the Rider 2 site would connect to the existing 36-inch water line located beneath Redlands Avenue and the Rider 4 site would connect to the 12-inch water line located beneath Redlands Avenue. No new or expanded off-site domestic water lines would be required to serve the Project.

EMWD policy recognizes recycled water as the preferred source of supply for non-potable water demands. There is an 8-inch recycled water line installed in Redlands Avenue that would serve both the Rider 2 and Rider 4 sites. The Project would include connections to this recycled water line to provide water for landscape irrigation within the building sites. No new or expanded off-site recycled water lines would be required to serve the Project.

Wastewater and Wastewater Treatment Facilities

Based on the wastewater generation factor of 1,700 gallons per day per acre (gpd/acre) for Light Industrial land use designations applied in the PVCCSP EIR (refer to Table 4.11-I, *PVCC Projected Generation of Wastewater*), the Project would generate approximately 110,500 gpd (0.1 mgd) of wastewater. As part of the Project, on-site wastewater collection systems would be constructed at the Rider 2 and Rider 4 building sites to collect wastewater and to convey wastewater to the existing 33-inch sewer line beneath Redlands Avenue. These on-site facilities would be sized to accommodate the wastewater generated by the Project. No new or expanded off-site sewer lines are required to serve the Project.

The 0.1 mgd of wastewater generated by the Project would be treated at the PVRWRF. As identified previously, the PVRWRD is designed to meet the projected demands of anticipated development in the region. This includes wastewater generated anticipated with buildout of the PVCCSP, which includes the proposed development. The Project's anticipated wastewater generation represents approximately 2 percent of the projected wastewater generation for the entire PVCCSP area, which is 5,316,295 gpd and approximately 0.4 percent of the PVRWRF's current daily capacity (22 mgd). The PVRWRF has sufficient capacity to treat wastewater generated by the Project in addition to EMWD's existing commitments. No new or expanded wastewater treatment facilities would be required.

Stormwater Drainage Facilities

As further discussed in Section 4.10, Hydrology and Water Quality, of this EIR, the Project would increase the amount of impervious surface within the Project area. As discussed in Section 3.0, Project Description, the Project would construct an on-site storm drain system, including curb and gutter, ribbon gutter, and storm drain lines that would flow to the proposed water quality facilities that would also be constructed as part of the Project. Stormwater from the Rider 2 site would flow to the existing PVCMDP Lateral A-B in Rider Street, and stormwater from the Rider 4 site would flow to the segment of PVCMDP Lateral G-2 (south of the Rider 4 site) that would also be installed as part of the Project. A pump station

is also required in the southwest portion of the Rider 4 site. Flows from Lateral A-B and Later G-2 would enter the PVSD Channel to the east.

As described in Section 3.6.7 of this EIR, the Project also involves improvement to the existing PVSD Channel, which is a regional facility located along the eastern portion of the Project area. The drainage needs along the PVSD Channel are outlined in the Master Drainage Plan for the Perris Valley Channel (RCFC&WCD, 1989). The proposed improvements to the PVSD Channel entail Phase 1 of a larger channel improvement project to accommodate 100-year storm flows, which begins approximately 100 feet north of Morgan Street and extends to just south of Rider Street; the Rider Street Bridge would also be extended. The proposed PVSD Channel right-of-way would be up to 580 feet wide and would include 15-foot wide access roads on each side until it reaches the CRA. The Project has been designed to protect the CRA. The CRA would have a concrete lined channel section constructed over the facility. The PVSD Channel would be aligned such that the existing manhole structures would be avoided and can remain protected in place. At the upstream and downstream ends of the concrete lining, cutoff walls would be constructed to protect against scour and channel degradation. Downstream of the CRA, the PVSD Channel would be deepened and would transition with an engineered drop structure at the MWD easement to a 440-foot-wide channel with a 56-foot-wide by 5-foot-deep low flow channel. The PVSD Channel would be earthen except in the vicinity of the engineered drop structure and Rider Street bridge, where it would have concrete side slopes. Erosion protection features would be installed, and existing storm drain inlets that tie into the PVSD Channel would be reconstructed as part of the Project. Based on preliminary design information, the bridge length would be approximately 260 feet with five spans, two abutments and four piers. Each pier in the channel would be supported by six 30-inch diameter columns. It is anticipated that 30-inch piles would support the column; however, this would be confirmed during the more detailed bridge design process.

Each element of the Project's proposed stormwater drainage system is designed to accommodate anticipated stormwater flows from the Rider 2 and Rider 4 sites under developed conditions. Additionally, the Project would install the backbone later G-2 storm drain. The proposed improvements to the PVSD Channel would remove the Rider 2 and Rider 4 sites from the 100-year flood plain and have been designed to protect the CRA facilities. No new or expanded off-site storm drain facilities are required to accommodate runoff from the Project area, beyond that proposed as part of the Project.

Dry Utilities (Electrical Power, Natural Gas, and Telecommunications)

The Project would include installation of on-site dry utility infrastructure to connect with the existing SCE and Charter Communications infrastructure adjacent to the Project area. There are existing power poles along the Project perimeter that would be protected in place or relocated as part of the Project. The Project would be served in accordance with the State of California's Public Utilities Commission (CPUC) and Federal Energy Regulatory Commission tariffs. The Project would not require natural gas for operations; therefore, no natural gas infrastructure would be installed as part of the Project. No new or expanded off-site dry utilities are required to serve the Project.

Environmental Impacts from Utility and Infrastructure Systems

As identified in the PVCCSP and PVCCSP EIR, domestic and recycled water infrastructure, sewer lines, storm drain infrastructure, and dry utilities would be installed in compliance with the requirements of the respective utility providers, and consistent with final plans approved by the utility providers. All

construction activities associated with the proposed utility infrastructure would be within the Project's construction impact area as shown in Figure 3-28, in Section 3.0, Project Description, of this EIR. The installation of the proposed infrastructure improvements would result in physical environmental impacts; however, these impacts have been included in the analyses of construction-related effects presented throughout this EIR, including the PVSD Channel improvements (e.g., air quality impacts, impacts to biological and cultural resources, water quality impacts, and noise and vibration impacts, etc.). Any applicable PVCCSP EIR mitigation measures and Project-specific mitigation measures for construction identified for each topical issue would address potential significant impacts associated with construction and installation of utilities. Therefore, through consistent implementation of a variety of measures related to construction impacts, no additional impacts related to construction and operation of utility systems would occur.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

<p>Threshold c Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during, normal, dry, and multiple dry years?</p>
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In compliance with Sections 10910–10915 of the California Water Code (commonly referred to as “Senate Bill 610” (SB 610) according to the enacting legislation), a WSA was prepared for the PVCCSP as part of the PVCCSP EIR to assess the impact of development allowed by the PVCCSP on existing and projected water supplies. The EMWD approved this WSA in July 2011 and determined that existing and planned EMWD water supplies are sufficient to meet project-related demands (City of Perris, 2011). Subsequently, the EMWD adopted its updated 2015 Urban Water Management Plan (UWMP), which contains more accurate projections for water supply and the ability to serve uses within its service area, including the PVCCSP area. The Project is being developed within the PVCCSP area and is consistent with the PVCCSP land use and growth assumptions assumed in the WSA prepared for the PVCCSP. The PVCCSP EIR concludes that the EMWD has adequate water supply to meet the potable demand for future development allowed by the PVCCSP as part of its existing and future demands and water supply would be less than significant.

Although the Project implements the PVCCSP and the water demand from the Project was anticipated in the PVCCSP WSA, a Project-specific WSA has been prepared by EMWD for the Project and is included in Appendix M of this EIR (EMWD, 2019), and is summarized herein.

EMWD's 2015 UWMP includes estimates of EMWD's demand during average, single and multiple dry years. EMWD's 2015 UWMP discusses the supply reliability for EMWD during dry years. It is anticipated that the majority of water for future development will be supplied by imported water from MWD during single dry years. Typically, MWD does not place imported water limits on a member agency but predicts the future water demand based on regional growth information. The 2015 UWMP – MWD shows that

MWD would have the ability to meet all of its member agencies' project supplemental demand through 2040, even under a repeat of historic drought scenarios. EMWD maintains a Water Shortage Contingency Plan (WSCP) that aims to reduce demand during water shortage using significant penalties for wasteful water use. EMWD's WSCP details demand reductions for several stages of shortage through a 50 percent or greater reduction. EMWD is currently in Stage 2 of the WSCP in response to improved statewide water supply conditions and the declared end of the drought emergency.

EMWD estimates the annual water demand for the Project to be 45 AF (refer to Table 9 or the WSA). The Project demand will be served using imported water from MWD, supplemented with new local supply projects during multiple-dry years, if needed. The land use considered for the Project area in the 2015 UWMP demand projection was Business Park/Light Industrial/Warehouse, Business Park/Light Industrial, and Open Space Recreation, with a projected demand of 51 AF (refer to table 10 of the WSA). Accordingly, the demand for this Project is anticipated to be within the limits of the projected demand accounted for in the 2015 UWMP. The combined total demand from the Project and other new/planned developments falls below the total amount of new demand anticipated in the 2015 UWMP. EMWD is constantly updating its water supply portfolio and developing local resources to meet future demand. In 2021, the EMWDs UWMP will be updated and include the Project in future demand projections and updates to the EMWD supply portfolio.

EMWD relies on MWD and local resources to meet the needs of its growing population. MWD stated in the 2015 UWMP – MWD that with the addition of all water supplies, existing and planned, MWD has the ability to meet all of its member agencies' projected supplemental demand through 2040, even under a repeat of historic multiple-year drought scenarios. Based on present information and the assurance that MWD is engaged in identifying solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies, EMWD has determined that it will be able to provide adequate water supplies to meet the potable water demand for this Project as part of its existing and future demands. Therefore, this impact is less than significant.

As with all new development in the City of Perris and in the EMWD service area, and as required by the PVCCSP standards and guidelines and applicable local and state regulations, the Project would install water efficient devices and landscaping. Further as discussed under Threshold a, the Project would include the installation of water infrastructure needed to serve the Project, as required by EMWD.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

Threshold d Would the project 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?

The PVCCSP EIR estimates that construction of future development under the Specific Plan would generate approximately 104,671.09 tons of solid waste over the 20-year construction period, which was determined to be approximately 0.10 percent of the combined annual capacity (i.e., yearly intake) of the Badlands and El Sobrante landfills (see Table 4.11-J, *Estimated Construction-Related Solid Waste Generation and Contribution*). The PVCCSP EIR concludes that, with the development of the PVCCSP, construction-related solid waste would not substantially contribute to exceeding the permitted capacity of these landfills. The PVCCSP EIR estimates that operation of future development under the Specific Plan would generate approximately 544,048.96 tons per year of solid waste, which was calculated to be approximately 10.65 percent of the combined annual capacity of the Badlands and El Sobrante landfills (see Table 4.11-K, *Anticipated Solid Waste Generation and Contribution*). The PVCCSP EIR concludes that, with the development of the PVCCSP, operational solid waste would not substantially contribute to exceeding the permitted capacity of the local infrastructure (City of Perris, 2011).

Construction-Related Solid Waste

Construction of the Project would result in the generation of construction-related waste, primarily consisting of discarded materials and packaging. Based on the U.S. Environmental Protection Agency's (EPA's) new construction waste generation rate of 3.89 pounds per square foot (lbs/sf) for Light Industrial uses, as applied in the PVCCSP EIR, construction of the proposed 1,352,736 sf of industrial warehouse/distribution uses would generate approximately 2,637.8 tons of solid waste over the construction period, which represents approximately 3.8 percent of the estimated construction solid waste stream for the development of allowed Light Industrial uses within the PVCCSP area, which was determined to be accommodated by the landfills serving the City (City of Perris, 2011). The Project's building construction is anticipated to occur over a period of approximately 12 months, which corresponds to an average of approximately 9.2 tons of construction waste generated per day from building construction activity. As previously stated, the Badlands Landfill is currently permitted to accept 4,800 tons per day and the El Sobrante Landfill is permitted to accept 16,054 tons per day. The Project's construction-related solid waste represents approximately 0.2 percent of the Badlands Landfill maximum daily capacity and 0.06 percent of the El Sobrante Landfill maximum daily capacity. It should be noted that the PVSD Channel improvements incrementally increase the amount of solid waste generation compared to that generated by the building construction.

However, based on more stringent requirements for waste reduction and diversion from landfills (65 percent per the Cal Green Code as discussed under Threshold "e", below), it is anticipated the solid waste generated by the Project during construction that would be diverted to landfills would be reduced compared to the estimate in the PVCCSP EIR (923.2 tons overall and an average of approximately 3.2 tons per day). Therefore, the disposal of construction-related solid waste associated with the Project would not exceed the permitted capacity of the Badlands or El Sobrante Landfills, and the impact would be less than significant. Therefore, the Project would result in a less than significant impact related to exceeding landfill capacity during construction.

Operational Solid Waste

Based on the operational solid waste disposal factor of 0.0108 tons/sf/year for Light Industrial uses identified in the PVCCSP EIR, the Project would generate approximately 14,609.5 tons/year of solid waste requiring landfill disposal (City of Perris, 2011). This represents approximately 3.8 percent of the estimated annual operation solid waste stream for the development of allowed uses in the PVCCSP area (388,743.42 tons/year), which was determined to be accommodated by the landfills serving the City. Based on this amount of annual solid waste generation the Project would generate approximately 40 tons of solid waste per day, which represents approximately 0.8 percent of the Badlands Landfill maximum daily capacity and 0.2 percent of the El Sobrante Landfill maximum daily capacity.

However, based on more stringent requirements for waste reduction and diversion from landfills (discussed in Threshold “e”, below), it is anticipated the solid waste generated by the Project during operation that would be diverted to landfills would be reduced compared to the estimate in the PVCCSP EIR. The ongoing operations of the PVSD Channel would generate nominal, if any, solid waste. Therefore, the disposal of operational solid waste associated with the Project would not exceed the permitted capacity of the Badlands or El Sobrante Landfills, and the impact would be less than significant.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR.

Threshold e Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?
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The PVCCSP EIR Initial Study concluded that the PVCCSP would comply with mandatory federal, State, and local management and reduction statutes and regulations related to solid waste and no impacts would occur.

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 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 AB 341, *Mandatory Commercial Recycling*, and the *California Solid Waste Reuse and Recycling Act of 1991*.

Additionally, the Project would be required to comply with applicable practices enacted by the City under the California Integrated Waste Management Act of 1989 (AB 939) and any other applicable local, State, and federal solid waste management regulations. AB 939 required that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The diversion goal has been increased to 75 percent by 2020 by SB 341. Further, the Solid Waste Disposal Measurement Act of 2008 (SB 1016) was

established to make the process of goal measurement (as established by AB 939) simpler, more timely, and more accurate. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population (or in some cases employment); and (2) its disposal, as reported by disposal facilities. In 2017 (the last year data was approved), the City implemented 38 programs to reduce solid waste generation and achieve the increased solid waste diversion required. These programs involve composting, facility recovery, household hazardous waste, policy incentives, public education, recycling, source reduction, and special waste materials (CalRecycle, 2020a). The City had an average disposal rate of 5.1 pounds per resident per day and 19.9 pounds per employee per day in 2018, which exceeds the established disposal rate target of 6.3 pounds per resident per day and meets the disposal rate target of 20.6 pounds per employee per day (CalRecycle, 2020b).

Building operators would participate in the City's recycling programs and comply with hazardous waste disposal regulations. As such, the Project would not conflict with any federal, State, or local regulations related to solid waste. Therefore, no impact related to compliance with solid waste statutes would occur, and no mitigation is required.

Additional Project-Level Mitigation Measures

No additional mitigation measures are required.

Level of Significance After Mitigation

Project impacts would be less than significant. This is consistent with the conclusions of the PVCCSP EIR Initial Study.

4.15.5 CUMULATIVE IMPACTS

Consistent with the PVCCSP EIR, the geographic context for the Utilities and Service Systems cumulative impact analysis is the service area for the respective utility providers, or the service area for specific facilities (e.g., the PVRWRF and landfills).

The EMWD will have to increase the capacities of their facilities to serve the City of Perris. The cumulative growth from the PVCCSP, including the Project, and other development in the City has been addressed by the City in the Perris General Plan EIR and by EMWD in its UWMP process. The PVCCSP EIR determined that the physical environmental impacts associated with construction of new water and sewer facilities, as identified in the PVCCSP, which includes the Project, were less than significant. At such time that EMWD constructs its own expanded facilities, the EMWD will serve as its own lead agency under CEQA and will make their own CEQA determinations at the time they construct their planned facilities. As described in Section 4.11 of the PVCCSP EIR, there is adequate existing capacity to provide water and sewer service to the PVCCSP development.

As with the Project, individual cumulative development projects would require the construction of necessary infrastructure (water and wastewater lines, storm drain facilities, pump stations, dry utility infrastructure, and others) to serve the projects. However, the infrastructure needed for the Project would be limited to relatively small distribution and collection lines, which would occur within the Project's identified construction impact area. No new or expanded off-site infrastructure is required. The

environmental impacts associated with the construction of these facilities have been addressed throughout this EIR and would be less than significant with mitigation. Therefore, the Project would not have a cumulatively considerable contribution to a significant cumulative impact associated with construction of utility infrastructure, consistent with the conclusions of the PVCCSP EIR.

The PVRWRF has an existing capacity of 22 million gpd and a proposed ultimate capacity of 100 million gpd, and is poised to meet current and future demands of the region (EMWD, 2016). As such, there is adequate existing and proposed capacity to provide wastewater treatment for the Project and cumulative development. Therefore, the Project would not have a cumulatively considerable contribution to a significant cumulative impact associated with water treatment facilities, consistent with the conclusions of the PVCCSP EIR.

Cumulative development in the watershed would result in an increase in impervious surfaces in addition to changes in land use. Increased impervious surface areas would alter hydrologic conditions by increasing storm water flows. As described in Section 4.11 of the PVCCSP EIR, with implementation of planned improvements included with the PVCCSP, there will be adequate existing capacity to accommodate storm water runoff from the PVCCSP development. Further, the Project involves implementation of PVSD Channel improvements and backbone storm drain infrastructure (lateral G-2) anticipated in the PVCCSP and evaluated in the PVCCSP EIR. As with the Project, cumulative development projects that would result in increased storm water runoff volumes would be required to address potential drainage system effects and to comply with existing regulations related to hydrology (as further described in Section 4.10, Hydrology and Water Quality, of this EIR) to ensure that Project-specific storm drain facility improvements are provided to avoid adverse effects on the existing and planned regional storm water drainage system. The Project would not have a cumulatively considerable contribution to a significant cumulative impact associated with storm drain facilities, consistent with the conclusions of the PVCCSP EIR.

The WSA analyzes the availability of EMWD water supplies to serve its customers, with the addition of water demand from the Project. As discussed above, the WSA indicates that the EMWD would have adequate water supplies to meet the demands of the Project, which are less than anticipated in EMWD's 2015 UWMP for the Project area. Thus, the Project would not have a cumulatively considerable contribution to a significant cumulative impact associated with water supply, consistent with the conclusions of the PVCCSP EIR.

Solid waste generated by the Project would represent nominal proportions of the daily disposal capacity at the Badlands and El Sobrante landfills. These solid waste facilities are currently projected to remain open and have sufficient daily capacity to handle solid waste generated by the Project and other cumulative developments both during construction and long-term operation. Further, the Project would adhere to regulations set forth in the CIWMP and other local and State regulations (including AB 341 and AB 939) during both construction and long-term operations. Other cumulative development would also be required to comply with such regulations. Therefore, the Project would not have a cumulatively considerable contribution to a significant cumulative impact related to solid waste disposal and compliance with regulations addressing the reduction of solid waste generation and disposal, consistent with the conclusions of the PVCCSP EIR.

Therefore, the Project would result in a less than cumulatively considerable impact on statutes and regulations related to solid waste.

4.15.6 REFERENCES

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5.0 ALTERNATIVES

5.1 INTRODUCTION

An environmental impact report (EIR) must identify ways to mitigate or avoid the significant effects that a project may have on the environment. In compliance with Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, an EIR must “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives”. The City of Perris, as the CEQA Lead Agency, is responsible for selecting a range of project alternatives. This section identifies potential alternatives to the Project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines on alternatives (Sections 15126.6[b]–15126.6[f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR.

- *“The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objective, or would be more costly” (Section 15126.6[b]).*
- *“The specific alternative of ‘no project’ shall also be evaluated along with its impact” (Section 15126.6[e][1]).*
- *“The ‘no project’ analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives” (Section 15126.6[e][2]).*
- *“The range of alternatives required in an EIR is governed by the ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (Section 15126.6[f]).*
- *For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (Section 15126.6[f][2][A]).*

- *“If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given locations” (Section 15126.6[f][2][B]).*
- *“An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (Section 15126.6[f][3]).*

Pursuant to the guidelines stated above, a range of alternatives to the Project is considered and evaluated in this EIR. These alternatives were developed in the course of project planning and environmental review. The discussion in this section provides the following:

- A description of alternatives considered.
- A comparative analysis of the alternatives under consideration and the Project. The focus of this analysis is to determine if alternatives are capable of eliminating or reducing the significant environmental effects of the Project to a less than significant level.
- An analysis of whether the alternatives meet most of the objectives of the Project (as presented in Section 3.5 of this EIR and restated below).

5.1.1 SUMMARY OF THE PROJECT

The Project implements the Perris Valley Commerce Center Specific Plan (PVCCSP) (City of Perris, 2018) and involves the construction and operation of two Class A high cube warehouse buildings (i.e., Rider 2 building and Rider 4 building) with a total building size of approximately 1,352,736 square feet (sf) on approximately 65 net acres (refer to Figure 3-4 and Figure 3-5, which depict the conceptual site plans for the Rider 2 and Rider buildings, respectively). The Project also involves improvements to a portion of the Perris Valley Storm Drain (PVSD) Channel, and replacement of the Rider Street bridge over the PVSD Channel. The proposed Rider 2 building would be 804,759 sf and the proposed Rider 4 building would be 547,977 sf; both buildings would consist of warehouse and office space. The buildings are not designed to accommodate any warehouse cold storage or refrigerated uses. The proposed development has been designed in compliance with the applicable Standards and Guidelines in the PVCCSP, including but not limited to landscape, parkway, setback, lot coverage, Floor Area Ratio (FAR), architectural requirements, and residential buffer requirements.

The Project includes an approximately 90-foot wide greenbelt along the Sinclair Street alignment (paper street), north of and outside of the MWD right-of-way. The greenbelt would include a meandering 15-foot wide decomposed granite trail and landscaping and would connect to the regional trail that would be constructed as part of the Project on the west side of the PVSD Channel. The PVCCSP includes a Visual Overlay Zone along I-215 and major roadways. Morgan Street, Redlands Avenue, and Rider Street are designated as a “Major Roadway Visual Corridor” and are subject to the standards and guidelines outlined in Section 4.2.9.2, Major Roadway Visual Zones, of the PVCCSP. Walls and fences would be provided on-site as required for screening, privacy, and security.

Access to the Project area would be provided from Morgan Street, Redlands Avenue, and Rider Street via six Project driveways. Access would also be provided from Sinclair Street. Roadway improvements

would be made along Redlands Avenue and Rider Street adjacent to the Project area, and Morgan Street would be constructed east of Redlands Avenue at the half-section width for a Local Street. Automobile and truck parking would be provided for the proposed buildings.

The Project would also include the installation or accommodation for on-site storm drain, water quality, water, sewer, electric, and telecommunications infrastructure systems to serve the proposed industrial uses. The on-site utility infrastructure would connect to existing utilities in the vicinity of the Project area.

The proposed improvements to the PVSD Channel would include the deepening of the PVSD Channel and the widening of the PVSD Channel to 550-feet. The PVSD Channel's right-of-way would extend to 580 feet wide and would include 15-foot wide access roads on each side of the channel until it reaches the CRA. The proposed widening of the PVSD Channel would also require replacing the existing Rider Street bridge over the Channel. The proposed bridge would be a 5-span continuous slab structure, 260 feet long and 78 feet 6 inches wide. There would be four piers in the channel and two abutments at the banks. The abutments and pier columns would be supported by six 30-inch diameter cast-in-drilled-hole concrete piles; no pile driving would be required to construct the bridge.

It is estimated that construction of the Project and PVSD Channel improvements would occur over an approximate 14-month period. If the Rider Street bridge is constructed in one stage, it would occur during this same construction period, while if construction of the Rider Street bridge occurs in two stages, this would extend the overall construction period by 5 months. The excavated soils from the PVSD Channel would be placed on the Rider 2 and Rider 4 sites to elevate the sites above the 100-year flood plain. The soils would be moved from the Channel to the building sites using scrapers, which would eliminate the need for heavy trucks to haul the soil. It is estimated that the Project would require approximately 180,000 cubic yards of earth work. The physical impact area associated with the Project is 99.2 acres including on- and off-site improvement areas: 29.1 acres associated with the Rider 2 building; 30.4 acres associated with the Rider 4 building; and, 29.7 acres associated with PVSD Channel improvements, including the Rider Street bridge.

The Project's proposed light industrial uses and PVSD Channel improvements are consistent with the PVCCSP. The Project would not require a Specific Plan Amendment, General Plan Amendment, or Zone Change. The Project involves a Development Plan Review (DPR) (Case No. 19-00004), Tentative Parcel Map (TPM) No. 37437 (Case No. 19-05-058), and Tentative Parcel Map (TPM) No. 37438 (Case No. 19-05-096), which are further described in Section 3.7, Summary of Requested Actions, of this EIR.

5.1.2 PROJECT OBJECTIVES

As stated in Section 3.5, of this EIR, and pursuant to Section 15124 of the CEQA Guidelines, the following objectives have been established for the Project to aid decision makers in their review of the Project.

1. Implement the Perris Valley Commerce Center Specific Plan through development of land uses allowed by the Light Industrial land use designation and consistent with the Standards and Guidelines relevant to the Project area and proposed uses.
2. Implement City of Perris General Plan policies and objectives relevant to the Project area and proposed industrial development.

3. To expand economic development and facilitate job creation in the City of Perris by establishing a new industrial development area adjacent to an already-established industrial area, including the initial phase of the Rider Logistics Center.
4. Maximize development of Class A speculative high cube warehouse industrial buildings in the Project area that meet contemporary industry standards for operational design criteria, can accommodate a wide variety of users, and are economically competitive with similar warehouse buildings in the local area and region, which will assist the City of Perris in competing economically on a domestic and international scale through the efficient and cost-effective movement of goods.
5. To attract new businesses to the City of Perris and thereby provide a more equal jobs-housing balance in the Riverside County/Inland Empire area that will reduce the need for members of the local workforce to commute outside the area for employment.
6. Provide for uses that will generate tax revenue for the City of Perris including, but not limited to, increased property tax, in order to support the City's ongoing municipal operations.
7. Provide Class A high cube warehouses that take advantage of the area's proximity to various freeways and existing and planned transportation corridors to reduce traffic congestion on surface streets and to reduce concomitant air pollutant emissions from vehicle sources.
8. Accommodate new development in a phased, orderly manner that is coordinated with the provision of necessary infrastructure and public improvements.
9. Implement PVSD Channel Improvements anticipated by the PVCMDP and PVCCSP in conjunction with the adjacent Rider 2 and Rider 4 high cube warehouse buildings to accommodate the 100-year storm flows in the area.
10. To assist the SCAG region in achieving jobs/housing balance region-wide by providing additional job opportunities in a housing rich area of the Inland Empire.

5.1.3 SUMMARY OF PROPOSED PROJECT SIGNIFICANT AND UNAVOIDABLE IMPACTS

The analysis in Section 4.0 concludes that, despite implementation of mitigation measures, significant environmental impacts would result from the construction and operation of the Project. As previously mentioned, an EIR should consider a range of feasible alternatives that would attain most of the Project objectives, listed above, while reducing one or more of the significant and unavoidable impacts of the Project. Significant and unavoidable impacts that would result from implementation of the Project include those listed below.

- **Cumulative Considerable Increase in Criteria Pollutant During Construction and Operation.** Maximum daily emissions from Project construction and operations would exceed the South Coast Air Quality Management District (SCAQMD) CEQA significance thresholds for nitrogen oxides (NOx) and cannot be effectively reduced to a level below SCAQMD thresholds. The NOx exceedance during construction is primarily due to the overlap in construction activities with the majority of emissions occurring during the Rider 2 and 4 Warehouse Construction – Building Construction phase (due to vendor trips accessing the Project area). With respect to operations, the magnitude of NOx reductions from identified mitigation measures would be

relatively small because over 95 percent of operational-source NO_x emissions would be generated from the mobile activities. Because NO_x is an ozone (O₃) precursor, this could also result in additional violations of the State and federal O₃ standards. O₃ is a nonattainment pollutant. There are no additional feasible mitigation measures beyond those identified in Section 4.3, Air Quality, of this EIR, that would reduce the project's NO_x emissions to a less than significant level. Therefore, the Project's construction and operational air quality impacts are significant and unavoidable relative to NO_x emissions, and the Project would result in a cumulatively considerable net increase in a criteria pollutant for which the Project region is in non-attainment, which is a significant and unavoidable impact.

- **Cumulative Greenhouse Gas Emissions.** The Project's GHG emissions would exceed the SCAQMD's recommended 10,000 million tons of carbon dioxide equivalent per year (MTCO₂e/yr) screening threshold for industrial projects. There are no additional feasible mitigation measures beyond those identified that would reduce the project's GHG emissions to a less than significant level. Therefore, this impact would be cumulatively considerable and significant and unavoidable.
- **Off-site Traffic Noise Impacts (Project and Cumulative).** Off-site Project-generated traffic noise would exceed the established threshold of significance along one roadway segment adjacent to sensitive noise receivers with trucks using only the Harley Knox Boulevard/I-215 interchange under Existing Plus Project and Cumulative traffic conditions. With truck use of only the Placentia Avenue/I-215 interchange off-site Project-generated traffic noise would be significant along one roadway segment adjacent to sensitive noise receivers under Existing Plus Project conditions, and two roadway segments under Cumulative conditions. There is no feasible mitigation for these impacts resulting in significant and unavoidable Project and Cumulative off-site traffic noise impacts.

5.2 ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD FOR FURTHER ANALYSIS

Section 15126.6(c) of the CEQA Guidelines specifies that an EIR should: (1) identify alternatives that were considered by the lead agency but were rejected because they were determined to be infeasible during the scoping process, and (2) briefly explain the reasons underlying the lead agency's determination. This section of the CEQA Guidelines states "Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The following alternatives were considered during the scoping and planning process, but were not selected for detailed analysis in this EIR. As described in greater detail below, the main reason for rejecting these alternatives was that they would not avoid or substantially reduce significant impacts associated with the Project, and would not be consistent with the Project objectives.

5.2.1 ALTERNATIVE SITE

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location, which are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is determining whether any of the significant effects of the project would be avoided or substantially lessened by developing the project at another location. Only locations that would

avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines, Section 15126.6[f][2][B]).

To meet a key Project objective to implement the PVCCSP through development of land uses allowed by the Light Industrial land use designation, the Alternative Site must be located within the PVCCSP area on a site designated for Light Industrial land uses. Further, any development within the PVCCSP area would be required to comply with the Standards and Guidelines outlined in the PVCCSP, similar to the Project. Sites designated for Light Industrial development within the PVCCSP area are limited to the area shown on Figure 4.11-1, Perris Valley Commerce Center Specific Plan Land Use Designations. The sites designated for Light Industrial uses include currently developed sites and vacant land. It is not anticipated that a site currently developed with Light Industrial uses would be redeveloped to accommodate the Project. Additionally, if removal of existing uses was required to implement the Project at an alternative site, construction-related impacts (including air quality emissions) would be greater than the Project since the Project area is currently undeveloped.

Development of Class A high cube warehouses similar to the size proposed by the Project at other sites within PVCCSP area would be expected to have similar significant and unavoidable impacts as the Project related to an increase in truck and vehicular trips: cumulatively considerable regional air quality impacts during construction and operational, cumulative greenhouse gas (GHG) emissions impacts, and Project and cumulative off-site traffic noise impacts. Therefore, development of the Project on an alternative site in the PVCCSP area that is designated for Light Industrial land uses would not avoid the direct and cumulative impacts of the Project related to air quality and GHG emissions.

It should also be noted that one of the primary reasons for the significant and unavoidable construction-related air quality impacts is the overlapping construction activities associated with the Rider 2 and Rider 4 buildings and the PVSD Channel improvements (including the Rider Street bridge). The proposed PVSD Channel improvements implement regional drainage improvements that can not be implemented elsewhere (i.e., at an alternative site). Additionally, the use of soil excavated from the PVSD Channel to raise the elevations of the building sites eliminates the need to transport this soil elsewhere, thereby reducing overall truck trips and associated emissions during construction.

As identified in the analysis presented in Section 4 of this EIR, with incorporation of PVCCSP Standards and Guidelines, PVCCSP EIR mitigation measures, regulatory requirements and Project-level mitigation measures, the Project would result in less than significant impacts or less than significant impacts with mitigation for construction-related, operational, and cumulative impacts related to aesthetics, agricultural resources, biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, transportation, tribal cultural resources, and utilities and services systems. Under this alternative, impacts associated with these topics would be similar to the Project, depending on the characteristics of that alternative site, because development of the Project at an alternative site would have a similar construction impact area, type of uses, and project size and would be subject to the same regulatory requirements, PVCCSP Standards and Guidelines, and mitigation measures.

Additionally, the Project Applicant does not own any other land in the PVCCSP area that would accommodate the Project and meet the Project objectives. CEQA does not require the consideration of sites not owned by the landowner or which could not be reasonably acquired by the landowner as alternatives to the proposed project (CEQA Guidelines, Section 15126.6[f][1]).

In summary, an alternative site in the PVCCSP area that is designated for Light Industrial uses would likely meet the Project objectives, but would not substantially reduce or avoid significant unavoidable impacts related to air quality and GHG emissions that would result from the Project. Therefore, further analysis of an alternative site(s) in this EIR is not required.

5.2.2 JURISDICTIONAL AREA IMPACT REDUCTION/AVOIDANCE ALTERNATIVE

A Jurisdictional Area Impact Reduction/Avoidance Alternative would involve development of only the areas of the Project area that do not contain jurisdictional biological resources. As noted in Section 4.4, Biological Resources, of this EIR, the Rider 2 and 4 sites and site-adjacent improvement areas would not result in impacts to jurisdictional waters or wetlands as there are no jurisdictional features present within these areas. Further, the PVSD Channel improvement area does not contain federally protected or other jurisdictional wetlands.

However, as shown on Figure 4.4-7 and Figure 4.4-8 of this EIR, the PVSD Channel improvement would impact jurisdictional water and riverine/riparian areas. The PVSD Channel improvements would temporarily impact 3.37 acres and 2,660 linear feet of Waters of the United States (WoUS) subject to the jurisdiction of the Army Corp of Engineers (Corps) and the Regional Water Quality Control Board (RWQCB) (all non-wetland waters), and 6.38 acres and 2,660 linear feet of streambed subject to the jurisdiction of California Department of Fish and Wildlife (CDFW) (0.20 acre and 264 linear feet of which consist of riparian streambed). The PVSD Channel improvements would also permanently impact 0.98 acre and 415 linear feet of WoUS subject to the jurisdiction of the Corps and the Regional Board (all non-wetland waters), and 1.14 acres and 415 linear feet of streambed subject to the jurisdiction of CDFW (all non-riparian).

The PVSD Channel improvements and associated Rider Street bridge are associated with planned regional improvements, and impacts to jurisdictional areas associated with these improvements cannot be avoided. Additionally, although implementation of the Project would result in permanent impacts to jurisdictional biological resources, there would be an overall increase in the amount of on-site jurisdictional waters beyond pre-Project conditions by up to 20 acres. Thus, the Project's impact was determined to be less than significant. Under the Jurisdictional Area Impact Reduction/Avoidance Alternative, impacts to jurisdictional areas would be avoided; however, the regional drainage improvements would not occur and there would not be an associated increase in jurisdictional area. The Project's impacts to biological resources are less than significant with mitigation; therefore, this alternative would not avoid a significant Project impact.

As noted previously, an alternative can be eliminated from detailed consideration in an EIR based on failure to meet most of the basic project objectives and the inability to avoid significant environmental impacts. The Jurisdictional Area Impact Reduction/Avoidance Alternative, which would still involve development of the Rider 2 and Rider 4 sites would meet most of the Project objectives; however, this alternative would not meet the objective of implementing PVSD Channel Improvements anticipated by the Perris Valley Channel Master Drainage Plan (PVCMDP) and PVCCSP. By eliminating completion of the planned regional drainage improvements, this alternative would have potential flooding impacts that would not occur with Project.

Further analysis of a Jurisdictional Area Impact Reduction/Avoidance Alternative is not required in this EIR.

5.2.3 FARMLAND AVOIDANCE ALTERNATIVE

The Project area contains 75.9 acres of “Farmland of Statewide Importance” and approximately 23.2 acres of “Farmland of Local Importance.” As shown on Figure 4.2-3, FMMP Farmlands Map, the area designated as Farmland of Statewide Importance includes the Rider 2 and Rider 4 building sites; therefore, this alternative would effectively eliminate any developed on the proposed building sites. As discussed in Section 4.2, Agriculture and Forestry Resources, the Project’s impacts to Farmland are less than significant based on the California Agricultural Land Evaluation and Site Assessment (LESA) analysis of the Project area.

As noted previously, an alternative can be eliminated from detailed consideration in an EIR based on failure to meet most of the basic project objectives and the inability to avoid significant environmental impacts. The Farmland Avoidance Alternative would not meet any of the Project objectives, which are related to development of a large-scale, highly efficient, Class A high cube warehouse.

The existing General Plan land use designation and zoning for the Project area is Specific Plan (i.e., the PVCCSP). The Rider 2 and Rider 4 sites are designated for Light Industrial uses in the PVCCSP. Therefore, preservation of the on-site Farmland of Statewide Importance would not be consistent with the City’s zoning or with the PVCCSP’s land use designations. Additionally, this alternative would be inconsistent with the City’s General Plan land use designations, goals and policies, zoning. The City’s 1991 General Plan Land Use Element redesignated all agricultural lands in the City for uses other than agriculture, thereby eliminating the City’s General Plan “agricultural” land use designation. The Comprehensive General Plan 2030 approved in 2005 also does not include any agricultural land use designations, with the exception of one small parcel that is designated “Light Agriculture” and is not in proximity to the Project area (City of Perris, 2005). The City’s long-range planning goal, as demonstrated through the General Plan Land Use Map (City of Perris, 2013), is to ultimately convert all existing Farmland in the City to non-agricultural uses rather than support the continuation of agricultural uses, which are not economically viable. The utilization of any portion of the Project area for low quality agricultural activity would not be consistent with the Project area’s existing land use designation (Specific Plan) and would impede the City from achieving the goals and objectives set forth in its General Plan including, but not limited to the following, which are further addressed in Section 4.11, Land Use and Planning, of this EIR:

- Orderly conversion of agricultural lands (Conservation Element, Goal I).
- Commerce and industry to provide jobs for residents at all economic levels (Land Use Element, Goal III).

Therefore, although this alternative would avoid the Project significant and unavoidable impacts due to the lack of development, this alternative would result in a significant and unavoidable Land Use and Planning impact due to inconsistency with the General Plan and its established goals and policies. The City is required to ensure that actions taken by the City are consistent with the General Plan.

In summary, there is no need to further evaluate a Farmland Avoidance Alternative since the Project would not result in a significant impact to Farmland. Additionally, such as alternative would not achieve the Project objectives and would conflict with the City’s General Plan land use designation, zoning, and

PVCCSP, and goals and policies that anticipate the conversion of agricultural lands to accommodate planned development.

5.3 ALTERNATIVE ANALYSIS

Based on the criteria listed previously, the alternatives described below have been determined to represent a reasonable range of alternatives. As described in Sections 4.1 through 4.15 of this EIR, the potentially significant impacts of the Project can be mitigated to a less than significant level with the exception of regional air quality impacts during construction and operation, cumulative GHG emissions impacts, and Project and cumulative off-site traffic noise impacts.

For the three “build” alternatives below, it is assumed that the PVCCSP Standards and Guidelines, Specific Plan EIR mitigation measures, and Project-specific mitigation measures identified for the Project would also be implemented with the alternative, and thus serve to reduce or avoid potential significant impacts similar to the Project.

The alternatives considered in this EIR include the following.

- Alternative 1 – No Project/No Development
- Alternative 2 – Reduced Intensity
- Alternative 3 – Reduced Development Area/One Building Alternative (Rider 2 Building)
- Alternative 4 – Alternate Use Compliant with the PVCCSP

5.3.1 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT ALTERNATIVE

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate a “no project” alternative to allow decision makers to compare the impacts of approving a Project with the impacts of not approving that project. Section 15126.6(e)(3) of the CEQA Guidelines describes the two general types of no project alternative: (a) when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the no project alternative would be the continuation of that plan and (b) when the project is other than a land use/regulatory plan (such as a specific development on an identifiable property), the no project alternative is the circumstance under which the project does not proceed. The Project is consistent with the PVCCSP and the City of Perris General Plan land use designation for the site (Specific Plan). For this reason, this EIR assumes the No Project/No Development Alternative would result in no new development or other improvements within the Project area.

Description of the Alternative

Under the No Project/No Development Alternative, the proposed development of two Class A high cube warehouse buildings and associated parking, infrastructure, and landscaping would not occur. Additionally, the planned regional PVSD Channel improvements would not be implemented. The Project area would remain in its current condition, and the Rider 2 and Rider sites would remain vacant.

Comparative Analysis of Environmental Impacts

Aesthetics

The No Project/No Development Alternative does not involve any development or change in the current condition of the Project area. There would be no change to the visual quality or character of the Project area or surrounding areas. Aesthetic changes associated with development of the Project area would not occur with this alternative. No significant and unavoidable aesthetic impacts related to visual change were identified for the Project and no significant and unavoidable aesthetic impacts would occur under this alternative.

Agriculture and Forestry Resources

There is no forest land within the Project area; therefore, the Project and the No Project/No Development Alternative would avoid impacts to forestry resources. Under the No Project/No Development Alternative, there would be no construction or development and the Project area would remain in its current condition and on-site Farmland would not be converted to non-agricultural uses. Therefore, this alternative would avoid all of the Project's less than significant impacts to agriculture and forestry resources.

Air Quality

The No Project/No Development Alternative would not involve any construction activities at the building sites or within the PVSD Channel. Therefore, the significant and unavoidable construction-related air quality emissions resulting from the Project would not occur. Because there would be no development within the Project area, operational activities and new traffic generated by the Project would not occur. SCAQMD thresholds for long-term operational emissions would not be exceeded. Therefore, this alternative would avoid significant long-term and cumulative unavoidable operational air quality impacts that would occur with implementation of the Project. As such, the air quality impacts of this alternative would be lower than those of the Project.

Biological Resources

The No Development Alternative would leave the Rider 2 and Rider 4 sites in their existing condition, which would include periodic disturbances related to discing and other routine, and on-site maintenance activities. Additionally, the PVSD Channel improvements would not occur. While this alternative would avoid temporary impacts to disturbed southern riparian scrub habitat, and temporary and permanent impacts to jurisdictional areas associated with the PVSD Channel and Rider Street bridge improvements, and would not result in potential impacts to nesting birds during construction, the Project's impacts would be less than significant with incorporation of applicable PVCCSP EIR mitigation measures and Project-specific mitigation measures. Additionally, without implementation of the regional drainage improvements, the No Project/No Development Alternative would not increase jurisdictional areas.

Cultural Resources

There are no historic or known archeological resources in the Project area. Therefore, no impact to historic or known archeological resources would occur with implementation of the No Project/No Development Alternative or the Project. The No Project/No Development Alternative would not involve

any excavation or grading activities. Therefore, the potential to discover previously unidentified archaeological resources is eliminated. With incorporation of the applicable PVCCSP EIR mitigation measures and Project-specific mitigation measures, Project impacts to archaeological resources are less than significant. This alternative would avoid the less than significant impacts to cultural resources resulting from implementation of the Project.

Energy

The No Project/No Development Alternative would not involve any construction activities or new development in the Project area. In the absence of construction activities and operation of the proposed uses, this alternative would require no demand for near-term or long-term energy or fuel use on the site. This alternative would avoid the Project's near- and long-term energy use and would avoid the Project's less than significant impacts.

Geology and Soils

The No Development Alternative would leave the property in its existing condition, which would include periodic ground disturbances related to discing, and other routine, on-site maintenance activities; these activities all have the potential to result in water and/or wind erosion that would not occur with the Project. The No Development Alternative would not construct any new structures in the Project area; accordingly, there would be no potential for this alternative to expose people or structures to safety risks associated with geologic hazards or result in significant adverse impacts to paleontological resources. This alternative would reduce the Project's less than significant impacts related to geology and soils.

Greenhouse Gas Emissions

The No Project/No Development Alternative would not involve any construction activities or new development in the Project area. In the absence of construction activities and operation of the proposed uses (including traffic generation), this alternative would not generate GHG emissions. The No Project/No Development Alternative would eliminate the significant and unavoidable cumulative impacts related to GHG emissions that would be generated by the Project.

Hazards and Hazardous Materials

Because no development would occur under the No Development Alternative, no new hazards would be introduced to the Project area. Routine weed abatement activities would continue to occur in the Project area to remove dry/dead vegetation that has the potential to pose a fire hazard, as required by the City of Perris. This alternative would reduce the Project's less than significant impacts related to hazards and hazardous materials.

Hydrology and Water Quality

Under the No Project/No Development Alternative, existing hydrology patterns and characteristics of the Project area and water quality conditions would remain unchanged. The Project would result in an increase in impervious surfaces, which would increase the amount of storm water runoff from the Project area and potentially increase the amount of pollutants entering the storm water. Each of these impacts—which would be less than significant for the Project through incorporation of applicable PVCCSP

Standards and Guidelines and Specific Plan EIR mitigation measures, compliance with existing regulatory requirements, and implementation of Project-specific mitigation measures—would be avoided under the No Project/No Development Alternative.

The Project would also result in an increase in the potential for soil erosion during grading and construction, although incorporation of PVCCSP Standards and Guidelines and Specific Plan EIR mitigation measures, compliance with existing regulatory requirements, and implementation of Project specific mitigation measures would reduce this potential to a level considered less than significant. Since No Project/No Development Alternative would not include any grading or construction, the potential increase for construction-related soil erosion that would result from the Project would not occur.

Under the No Project/No Development Alternative, the planned regional PVSD Channel improvements would not be implemented, resulting in continued potential flooding impacts, and a greater impact compared to the Project.

Overall, the No Project/No Development Alternative would avoid the less than significant hydrology and water quality impacts resulting from the Project, but would have greater impacts associated with potential flooding.

Land Use and Planning

Under the No Project/No Development Alternative, there would be no change in the existing or planned conditions in the Project area. This alternative would not result in any direct or indirect physical land use impacts. The City of Perris General Plan land use and zoning designation for the Project area is “Specific Plan” for the PVCCSP area. The PVCCSP designates the Rider 2 and Rider 4 sites for Light Industrial uses, and the PVSD Channel is designated for the Future Perris Valley Storm Drain. Therefore, implementation of the No Project/No Development Alternative would not comply with existing zoning and land use designations for future development with Light Industrial uses and channel improvements. Similarly, this alternative would not be consistent with goals and policies of the Land Use Element of the General Plan related to commerce and industry to provide jobs for residents at all economic levels. Therefore, land use impacts from the No Project/No Development Alternative would be potentially significant and greater than the Project related to consistency with planning programs.

The No Project/No Development Alternative would not involve any development and would not conflict with regional planning programs addressing operations at March Air Force Base (MARB), nor would it conflict with the Southern California Association of Government’s (SCAG’s) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) or Connect SoCal Plan. Development of the Project would also not conflict with these regional planning programs.

Noise

The No Project/No Development Alternative would not involve any grading or construction activities. Therefore, noise and vibration effects associated with these construction activities would not occur under this alternative. However, the construction-related noise impacts from the Project would be less than significant. The increase in long-term, traffic-related, and operational noise levels associated with the Project would not occur. Therefore, this alternative would avoid the Project’s significant and unavoidable off-site traffic-related noise impacts.

Transportation

The No Project/No Development Alternative would not change the existing circulation conditions because no new development would occur in the Project area and because circulation improvements proposed with the Project would not be implemented (including roadway, trail, and sidewalk improvements). No long-term (operational) vehicular trips would be generated under the No Project/No Development Alternative. The Project would have less than significant impacts related to consistency with plans and programs addressing circulation, vehicle mile traveled (VMT), potential hazards, and emergency access. Therefore, this alternative would avoid the Project's less than significant impacts related to transportation.

Tribal Cultural Resources

The No Development Alternative would leave the property in its existing condition. No grading would occur under this alternative and there would be no potential impacts to tribal cultural resources that may be buried beneath the ground surface. This alternative would avoid all new disturbances and would avoid the potential for Project construction activities to damage buried tribal cultural resources, although Project impacts are also less than significant with implementation of the identified mitigation measures.

Utilities and Service Systems

The No Project/No Development Alternative would not place any new demands on local and regional utilities and service systems because no new development would occur. Under this alternative, no new utilities would be constructed and no physical impacts would result. Impacts to utilities and services systems, including impacts related to solid waste management under this alternative and the Project would be less than significant.

Conclusions

Avoid or Substantially Lessen the Significant Impacts of the Project

The No Project/No Development Alternative would avoid significant and unavoidable air quality, GHG Emissions and noise impacts resulting from implementation of the Project. Additionally, because no development would occur under the No Project/No Development Alternative, less than significant impacts resulting from the Project for the following environmental topics would be avoided: aesthetics, agriculture and forestry resources, biological cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, transportation, tribal cultural resources, and utilities and service systems. This alternative would not create additional jurisdictional areas, would not improve flooding conditions by containing the 100-year flood within the PVSD Channel, and would have greater land use and planning impacts compared to the Project due to inconsistency with planning programs.

Attainment of Project Objectives

The No Project/No Development Alternative would not involve any development in the Project area. This alternative would not attain any of the Project Objectives identified above in Section 5.1.2, including implementation of the PVCCSP and the City's General Plan goals and policies relevant to the Project area and proposed industrial development, and completion of regional PVSD Channel improvements.

5.3.2 ALTERNATIVE 2: REDUCED INTENSITY ALTERNATIVE

Description of the Alternative

The purpose of the Reduced Intensity Alternative is to address significant and unavoidable impacts of the Project related to operational air quality, GHG emissions, and off-site traffic-related noise impacts. Each of these impacts is primarily associated with vehicular (including truck) trips. Under this alternative, the Project area would be developed with two industrial buildings with a total square footage of 1,014,552 sf. This represents a reduction in development of 338,184 sf compared to the Project (approximately 25 percent). The PVSD Channel improvements would also be implemented.

The configuration of the buildings is not relevant to the analysis of potential traffic-related air quality, GHG emissions, and off-site noise impacts. This analysis is solely related to the volume of traffic, which correlates to air quality and GHG emissions and noise from truck trips. However, for purposes of analysis, it is assumed that the buildings would have a similar configuration as the Project and other components of the Project related to access, landscaping, infrastructure, and other amenities would be the same.

Relevant to this alternatives analysis is the amount of average daily trip (ADT) generation. Applying the trip generation calculations for the Project (as presented in Table 4.13-1, Trip Generation Summary, in Section 4.13, Transportation), the Reduced Intensity Alternative would result in a net reduction in ADT compared to the Project. This alternative would result in approximately 1,445 ADT compared to 1,926 ADT with the Project.

Comparative Analysis of Environmental Impacts

Aesthetics

Similar to the Project, development of the Reduced Intensity Alternative would alter the existing visual condition of the Project area through introduction of development on previously vacant, undeveloped sites. The Reduced Intensity Alternative would comply with the Standards and Guidelines set forth in PVCCSP, as described in Section 4.1, Aesthetics, including building orientation, screening, architecture, lighting, signage, walls/fences, and landscaping. The architectural design of the building would be the same as the Project as identified in Figures 3-6 through 3-11. Further, the landscaping along Redlands Avenue, Rider Street and Morgan Street, which are designated Major Roadway Visual Corridors in the PVCCSP, would be the same as with the Project. It is expected that the overall visual appearance under this alternative would be similar to the Project and would not represent a significant impact. As with the Project, the development associated with the Reduced Intensity Alternative would comply with County of Riverside Ordinance No. 655, which addresses nighttime lighting that could affect the Palomar Observatory, and requirements set forth in the PVCCSP related to lighting and glare. With incorporation of the applicable PVCCSP Standards and Guidelines and the Project-specific mitigation addressing construction activities, the Reduced Intensity Alternative would have similar, less than significant impacts as the Project related to aesthetics.

Agriculture and Forestry Resources

The Reduced Intensity Alternative would involve the same construction impact area as the Project as shown on Figure 3-27 in Section 3.0, Project Description, of this EIR. Therefore, this alternative would

result in the same potential impacts to on-site Farmland as the Project and would result in the conversion of Farmland to non-agricultural uses. The Reduced Intensity Alternative would have similar, less than significant impacts as the Project related to agriculture resources, and no impact to forestry resources.

Air Quality

As with the Project, development of the Reduced Intensity Alternative would result in less than significant impacts related to sensitive receptors including health risk because the total trip generation would be lower than that for the Project. Therefore, localized emissions of diesel particulate matter and toxic air contaminants would be reduced. As with the Project, the Reduced Intensity Alternative would be consistent with PVCCSP and would be consistent with the vehicular trips anticipated in the AQMP, thereby resulting in a less than significant impact related to consistency with the AQMP.

Implementation of the Reduced Intensity Alternative would have the same construction impact area as the Project, and the construction assumptions with respect to the intensity of construction would be similar. Therefore, construction emissions and associated impacts would be significant and unavoidable, even with mitigation, similar to the Project.

Because the building operations with the Project would be reduced with the Reduced Intensity Alternative, total operational emissions (which include area, energy, and mobile sources) including NOx emissions would be lower than the Project due to the 338,184-sf reduction in the size of the buildings. Operational emissions would be reduced by approximately 25 percent consistent with the reduction in building size and trip generation (which is calculated based on building size). Based on the estimated NOx emissions for the Project (refer to Tables 4.3-7 through 4.3-9 in Section 4.3, Air Quality), the Reduced Intensity Alternative would generate approximately 119.66 lbs/day of NOx (compared to 159.55 lbs/day with the Project).

Despite this reduction in emissions, operational regional emissions generated with the Reduced Intensity Alternative would exceed the SCAQMD CEQA significance threshold for NOx as with the Project. As with the Project, even with implementation of mitigation measures identified in Section 4.3, Air Quality, the amount of NOx emissions reduction would not reduce emissions to below the 55 lbs/day threshold of significance. Long-term operational emissions of NOx (an ozone precursor) resulting from the Reduced Intensity Alternative would be cumulatively considerable for O₃—which is a nonattainment pollutant—resulting in a significant cumulative impact. Therefore, although the amount of emissions would be reduced, the Reduced Intensity Alternative would not eliminate the Project's significant, unavoidable operational and cumulative air quality impacts resulting from operational emissions, and the decrease in emissions is not considered to be substantial.

Biological Resources

The Reduced Intensity Alternative would involve the same construction impact area as the Project as shown on Figure 3-27, including impacts within the PVSD Channel. Therefore, this alternative would result in the same temporary and/or permanent impacts to biological resources (including potential impacts to nesting birds, disturbed southern riparian scrub, and jurisdictional areas) as the Project. With incorporation of the applicable PVCCSP EIR mitigation measures and Project-level mitigation measures, the impacts to biological resources would be less than significant with the Reduced Intensity Alternative and the Project.

Cultural Resources

There are no historic or known archeological resources in the Project area. Therefore, no impact to historic or known archeological resources would occur with implementation of the Reduced Intensity Alternative or the Project. The Reduced Intensity Alternative would involve the same construction impact area as the Project as shown on Figure 3-27. Therefore, this alternative would result in the same potential impacts to unknown archaeological resources as the Project. With incorporation of the applicable PVCCSP EIR mitigation measures and Project-level mitigation measures, the Reduced Intensity Alternative would have similar, less than significant impacts as the Project related to cultural resources.

Energy

Implementation of the Reduced Intensity Alternative would result in lower energy demand during construction compared to the Project because of the overall reduction in building size. The Reduced Intensity Alternative would involve development of two industrial buildings totaling 1,014,552 sf, which is 338,184 sf less than the Project. This alternative would result in reduced energy demand during operational activities. Therefore, the Reduced Intensity Alternative would have reduced energy impacts than the Project. The Reduced Intensity Alternative would have similar, less than significant impacts as the Project related to energy.

Geology and Soils

The Reduced Intensity Alternative would involve the same construction impact area as the Project as shown on Figure 3-27. Therefore, this alternative would result in the same potential impacts related to geology and soils and seismic hazards as the Project. With adherence to applicable building codes and incorporation of the recommendations from the site-specific geotechnical studies, the Project would not expose people or structures to substantial safety risks associated with geologic hazards. Further, because the construction impact area would be the same as the Project, this alternative would also have the potential to impact subsurface paleontological resources and the impact would be reduced to a less than significant level with mitigation. Therefore, with incorporation of the applicable PVCCSP EIR mitigation measures and Project-level mitigation measures, and adherence to applicable regulations, geology and soils impacts would be less than significant with implementation of the Reduced Intensity Alternative and the Project.

Greenhouse Gas Emissions

Implementation of the Reduced Intensity Alternative would result in lower energy demand during construction compared to the Project because of the reduction in building size. This alternative would also result in reduced emissions from all operational GHG sources because the emissions from each source would vary in direct proportion to the building size. Total operational emissions (which include energy, mobile, solid waste, and water consumption sources) for this alternative would be approximately 10,089 MTCO₂e/yr (compared to 13,452.29 MTCO₂e/yr with the Project). Therefore, the Reduced Intensity Alternative would have lower GHG emission impacts than the Project. However, the GHG emissions under this alternative would still exceed the SCAQMD's 10,000 MTCO₂e/yr screening threshold and the impact would be cumulatively significant and unavoidable, consistent with the Project.

Hazards and Hazardous Materials

Neither implementation of the Reduced Intensity Alternative nor the Project would result in a significant impact related to hazards or hazardous materials. Based on the location and condition of the Project area, the Reduced Intensity Alternative and the Project would have no impact associated with hazardous emissions within 0.25 mile of a school, location on a hazardous materials site, or wildland fire. Land uses that would occur on-site under the Reduced Intensity Alternative would have a similar potential to handle and store hazardous materials as the Project, and similar impacts related to hazards associated with the MARB/IPA, and emergency response/evacuation. With incorporation of the applicable PVCCSP EIR mitigation measures and mandatory regulatory compliance, both the Reduced Intensity Alternative and the Project would pose a less than significant hazard to the public or the environment related to hazards and hazardous materials.

Hydrology and Water Quality

The Reduced Intensity Alternative would involve development of the same area that would occur with implementation of the Project. Therefore, this alternative would result in similar impacts related to hydrology and water quality as the Project. Similar to the Project, development under this alternative would increase the amount of storm water runoff and alter existing drainage patterns due to the increase in the amount of impervious surfaces. As with the Project, application of Best Management Practices (BMPs) and other regulatory requirements would ensure that impacts to hydrology and storm drain infrastructure are less than significant. An on-site storm drain system would be constructed to detain flows such that they are released from the site at near pre-development levels and would not result in impacts to storm drain facilities or flooding. Additionally, the proposed PVSD Channel improvement to address regional flooding issues would be constructed and would accommodate the 100-year flood conditions. As with the Project, with the incorporation of applicable PVCCSP Standards and Guidelines, regulatory requirements and Project-specific mitigation measures, the Reduced Intensity Alternative would have similar, less than significant impacts as the Project related to hydrology and flooding.

As with the Project, the Reduced Intensity Alternative would not involve excavation at depths that would encounter groundwater, and would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

As with the Project, the Reduced Intensity Alternative would result in surface runoff after Project implementation. Surface runoff from a developed condition (with either this alternative or the Project) would have a different composition in comparison to the existing condition, which is undeveloped. This runoff is likely to include a similar amount and type of pollutants commonly found in urban runoff. The Project and this alternative would be required to comply with applicable regulations related to water quality, including, but not limited to the Municipal Separate Storm Sewer (MS4) and National Pollutant Discharge Elimination System (NPDES) permit requirements, which would minimize potential short-term, construction-related and long-term, operational water quality impacts. With the incorporation of applicable PVCCSP Standards and Guidelines, and adherence to applicable requirements, the Reduced Intensity Alternative would have similar, less than significant impacts as the Project related to water quality during construction and operation.

Land Use and Planning

The City of Perris General Plan land use and zoning designation for the Project area is “Specific Plan” for the PVCCSP area. The PVCC Specific Plan serves as the regulatory document for future development in the Specific Plan area. The PVCCSP designates the Project area for Light Industrial uses and Future Perris Valley Storm Drain. As with the Project, the Reduced Intensity Alternative would result in the development of an industrial project and would implement planned regional PVSD Channel consistent with the PVCCSP. Under this alternative, the Project area would be developed in compliance with the relevant Standards and Guidelines outlined in the PVCCSP and would not result in significant land use impacts, as with the Project. The development of a 1,014,552-sf high cube warehouse in the Project area would be consistent with the PVCCSP and relevant goals and policies of the City of Perris General Plan. The Reduced Intensity Alternative would have similar, less than significant, impacts as the Project related to land use and planning.

The Reduced Intensity Alternative would not conflict with regional planning programs addressing operations at MARB, nor would it conflict with SCAG’s RTP/SCS or Connect SoCal Plan. Development of the Project would also not conflict with these regional planning programs.

Noise

Because construction activities would be similar, implementation of the Reduced Intensity Alternative would result in similar noise impacts during construction as the Project. Construction noise impacts would be less than significant, similar to the Project.

As identified previously, the Reduced Intensity Alternative would generate fewer Project-generated trips than the Project (approximately 1,445 daily trips compared to 1,926 daily trips with the Project). The volume of trucks on the designated truck routes, including, but not limited to Harley Knox Boulevard, Redlands Avenue, and Indian would be lower than the Project, thereby reducing off-site noise levels from trucks. However, the reduction in truck trips would not eliminate the significant and unavoidable off-site traffic-related noise impacts. Similar to the Project, Project and cumulative off-site traffic noise impacts would be significant and unavoidable with the Reduced Intensity Alternative as the decrease in noise impacts is not considered substantial.

The Reduced Intensity Alternative would reduce the truck activity at the building loading docks compared to what would occur with the Project, thereby reducing operational noise potentially impacting nearby sensitive noise receivers. Therefore, the this alternative and the Project would have a less than significant impact related to operational noise.

As with the Project, the Reduced Intensity Alternative would not be subjected to substantial noise levels from MARB/IPA operations resulting in a less than significant impact.

Transportation

The Project area is within a low VMT area, which would not change under the Reduced Intensity Alternative. Therefore, as with the Project, development under this alternative would also have a less than significant VMT impact.

As with the Project, this alternative would incorporate applicable PVCCSP Standards and Guidelines related to transportation and circulation, including construction of adjacent roadways and access improvements necessary to serve the Project, and construction of improvements to encourage pedestrian and bicycle travel, and transit use. The Reduced Intensity Alternative and the Project would not conflict with applicable programs, plans, ordinances or policies addressing the circulation system; would not create hazards through design; and, would not result in inadequate emergency access. As with the Project, transportation impacts under this alternative would remain less than significant.

Tribal Cultural Resources

The Reduced Intensity Alternative would involve the same construction impact area as the Project as shown on Figure 3-27. Although there are no known tribal cultural resources within the Project area, this alternative would result in the same potential impacts to tribal cultural resources within the Project area as the Project, should they be present. With incorporation of the applicable PVCCSP EIR mitigation measures and Project-level mitigation measures, the Reduced Intensity Alternative would have similar, less than significant impacts as the Project related to tribal cultural resources.

Utilities and Service Systems

As with the Project, the Reduced Intensity Alternative would increase the water demand, wastewater generation, and electric demand at the Project site compared to existing conditions where the site is undeveloped. Additionally, as discussed above under Hydrology and Water Quality, the Reduced Intensity Alternative would involve development of the same area that would occur with implementation of the Project and would generate a similar amount of storm water runoff. Although the total building size would be reduced, the overall utility infrastructure needed to serve the Reduced Intensity Alternative would be the same as the Project and would be located within the same construction impact area as shown on Figure 3-27 for the Project. Therefore, as with the Project, the Reduced Intensity Alternative would have similar, less than significant impacts as the Project related to the installation of utility infrastructure.

The PVCCSP EIR estimates water demand and wastewater generation based on the size of the development area (acres); therefore, the Reduced Intensity Alternative, which has the same development area as the Project, would have the same estimated water demand and wastewater generation as the Project. Therefore, the conclusions of the Project-specific Water Supply Assessment (WSA) would be applicable to this alternative, and the Eastern Municipal Water District (EMWD) would have sufficient water to serve the Reduced Intensity Alternative. Similarly, there would be adequate capacity in EMWD wastewater treatment facilities to treat wastewater generated. The Reduced Intensity Alternative and Project would have less than significant impacts related to water supply and wastewater treatment.

As with the Project, construction and operation of industrial uses under the Reduced Intensity Alternative would comply with applicable local and state regulations related to solid waste management and diversion of solid waste from landfills. The Reduced Intensity Alternative and Project would have less than significant impacts related to solid waste.

Conclusions

Avoid or Substantially Lessen the Significant Impacts of the Project

Due to the 25 percent reduction in building size with the Reduced Intensity Alternative, there would be a related 25 percent reduction in average daily trip generation, including truck trips. Significant and unavoidable impacts associated with cumulatively considerable regional operational air quality impacts, cumulative GHG emissions, and off-site traffic-related noise impacts that result from the Project would be reduced, but not eliminated with this alternative, and these decreases in significant and unavoidable impacts are not considered substantial. With respect to cumulatively considerable regional operational air quality impacts, the construction activities for this alternative would be similar to the Project and would also be significant and unavoidable. For all other topical areas, similar or reduced impact levels would occur with the Reduced Intensity compared to the Project.

Attainment of Project Objectives

Following is a discussion of the Reduced Intensity Alternative's ability to attain the Project Objectives.

- 1. Implement the Perris Valley Commerce Center Specific Plan through development of land uses allowed by the Light Industrial land use designation and consistent with the Standards and Guidelines relevant to the Project area and proposed uses.** The Reduced Intensity Alternative would attain this objective.
- 2. Implement City of Perris General Plan policies and objectives relevant to the Project area and proposed industrial development.** The Reduced Intensity Alternative would attain this objective.
- 3. To expand economic development and facilitate job creation in the City of Perris by establishing a new industrial development area adjacent to an already-established industrial area, including the initial phase of the Rider Logistics Center.** The Reduced Intensity Alternative would attain this objective, but not to the same extent as the Project since the reduced building size would also reduce the number of potential jobs created (when considering jobs are based on a certain number of employees per square foot of development).
- 4. Maximize development of Class A speculative high cube warehouse industrial buildings in the Project area that meet contemporary industry standards for operational design criteria, can accommodate a wide variety of users, and are economically competitive with similar warehouse buildings in the local area and region, which will assist the City of Perris in competing economically on a domestic and international scale through the efficient and cost-effective movement of goods.** The 1,014,552 sf of buildings under the Reduced Intensity Alternative, would be 25 percent less than the Project, and would not maximize development of the site based on the development standards outlined in the PVCCSP. Therefore, the Reduced Intensity Alternative would not achieve this objective.
- 5. To attract new businesses to the City of Perris and thereby provide a more equal jobs-housing balance in the Riverside County/Inland Empire area that will reduce the need for members of the local workforce to commute outside the area for employment.** The Reduced

Intensity Alternative would attain this objective, but would not generate as many employment opportunities as the Project.

6. **Provide for uses that will generate tax revenue for the City of Perris including, but not limited to, increased property tax, in order to support the City's ongoing municipal operations.** The Reduced Intensity Alternative would have 25 percent less building space than the Project, and thus would not generate as much tax revenue as the Project. Therefore, the Reduced Intensity Alternative would not achieve this objective as effectively as the Project.
7. **Provide Class A high cube warehouses that take advantage of the area's proximity to various freeways and existing and planned transportation corridors to reduce traffic congestion on surface streets and to reduce concomitant air pollutant emissions from vehicle sources.** The Reduced Intensity Alternative would attain this objective.
8. **Accommodate new development in a phased, orderly manner that is coordinated with the provision of necessary infrastructure and public improvements.** The Reduced Intensity Alternative would attain this objective.
9. **Implement PVSD Channel Improvements anticipated by the PVCMDP and PVCCSP in conjunction with the adjacent Rider 2 and Rider 4 high cube warehouse buildings to accommodate the 100-year storm flows in the area.** The Reduced Intensity Alternative would attain this objective.
10. **To assist the SCAG region in achieving jobs/housing balance region-wide by providing additional job opportunities in a housing rich area of the Inland Empire.** The Reduced Intensity Alternative would attain this objective, but would not generate as many employment opportunities as the Project.

5.3.3 ALTERNATIVE 3: REDUCED DEVELOPMENT AREA/ONE BUILDING ALTERNATIVE (RIDER 2 BUILDING)

Description of the Alternative

The purpose of the Reduced Development Area/One Building Alternative (Rider 2 Building) (referred to herein as the Reduced Development Area Alternative) is to address significant and unavoidable impacts of the Project related to regional construction and operational air pollutant emissions, GHG emissions, and off-site traffic related noise. Under this alternative, the Rider 4 building would be eliminated; the development would be limited to the Rider 2 building and the PVSD Channel improvements (including the Rider Street bridge), consistent with the Project. Under this alternative, the physical impact area from the Rider 2 and Rider 4 buildings would be reduced from 69.5 acres (including on-site and off-site improvement areas) to 39.1 acres. The physical impact area associated with the PVSD Channel improvements would remain at 29.7 acres. Although the Rider 4 site would not be developed under this alternative, soil removed from the PVSD Channel would still be placed on the Rider 4 site.

As with the Project, under this alternative, the Rider 2 building would consist of one Class A high cube, non-refrigerated warehouse building with a total square footage of 804,759 sf, as shown on the conceptual site plan for the Rider 2 building presented in Figure 3-4. It should be noted that this

Alternative would only delay, but not eliminate the ultimate development of the Rider 4 building site pursuant to the approved PVCCSP, which anticipates development of the Rider 4 site with Light Industrial uses. The architecture, landscape, hardscape, and lighting concepts would be the same as the Project and would be consistent with the Standards and Guidelines identified in the PVCCSP, as described in Section 3.0, Project Description. As with the Project, access to the site would be provided from access points along Redlands Avenue and Rider Street. It is also assumed that required utility infrastructure and roadway improvements similar to that described for the Project would occur with this alternative. It should be noted that this alternative would not include the implementation of a linear park on the north side of the MWD easement as that Project feature is associated with the Rider 4 building.

Relevant to this alternatives analysis is the amount of average daily trip (ADT) generation. Applying the trip generation calculations for the Project (as presented in Table 4.13-1, Trip Generation Summary, in Section 4.13, Transportation), the Reduced Development Area Alternative would result in a net reduction in ADT compared to the Project. This alternative would result in approximately 1,128 ADT compared to 1,926 ADT with the Project.

Comparative Analysis of Environmental Impacts

Aesthetics

Similar to the Project, development of the Reduced Development Area Alternative would alter the existing visual condition of the Project area through introduction of development on a previously vacant, undeveloped area (Rider 2 site). However, the Reduced Development Area Alternative would only develop the Rider 2 building and leave the Rider 4 building in its existing undeveloped condition. The Reduced Development Area Alternative would comply with the Standards and Guidelines set forth in PVCCSP, as described in Section 4.1, Aesthetics, including lot coverage, screening, architecture, lighting, signage, walls/fences, and landscaping. The architectural design of the building would be similar to that of the Project as identified in Figures 3-6, 3-7 and 3-10. Further, the landscaping along Redlands Avenue and Rider Street, which are designated Major Roadway Visual Corridors in the PVCCSP, and along the eastern portion of the Project site (adjacent to the PVSD channel) would be similar to the Project. It is expected that the overall visual appearance under this alternative would be similar to the Project and would not represent a significant impact. As with the Project, the development associated with the Reduced Development Area Alternative would comply with County of Riverside Ordinance No. 655, which addresses nighttime lighting that could affect the Palomar Observatory, and requirements set forth in the PVCCSP related to lighting and glare. With incorporation of the applicable PVCCSP Standards and Guidelines and the Project-specific mitigation addressing construction activities, the Reduced Development Area Alternative would have similar, less than significant impacts as the Project related to aesthetics.

Agriculture and Forestry Resources

The Reduced Development Area Alternative would reduce the physical impact area as compared to the Project, and would avoid impacts to Farmland of Statewide Importance that occurs on the Rider 4 site. Therefore, this alternative would result in less impacts to Farmland of Statewide Importance compared to the Project; however, the development of the Rider 2 site under the Reduced Development Area Alternative would still result in the conversion of Farmland of Statewide Importance to non-agricultural

uses. The Reduced Development Area Alternative and the Project would have less than significant impacts to agriculture resources, and no impact to forestry resources.

Air Quality

As with the Project, development of the Reduced Development Area Alternative would result in less than significant impacts related to sensitive receptors including health risk because the total trip generation would be lower than that for the Project. Therefore, localized emissions of diesel particulate matter and toxic air contaminants would be reduced. As with the Project, the Reduced Development Area Alternative would be consistent with PVCCSP and would be consistent with the vehicular trips anticipated in the AQMP, thereby resulting in a less than significant impact related to consistency with the AQMP.

Implementation of the Reduced Development Area Alternative would have a reduced construction impact area as the Project and construction emission would likely be reduced. However, construction of the Rider 2 building would still overlap with construction of the PVSD Channel improvements, including the Rider Street bridge. As discussed in Section 4.3, Air Quality, of this EIR, the NO_x exceedance from the Project is primarily due to the overlap in construction activities. As previously discussed, NO_x is an O₃ precursor, which is a nonattainment pollutant. Therefore, this alternative would reduce but not avoid the significant and unavoidable regional construction-related air quality impacts resulting from the Project.

Due to the reduction in building size and reduction in associated trip generation, the total operational emissions (which include area, energy, and mobile sources) with the Reduced Development Area Alternative would be reduced by approximately 41 percent compared to the Project (consistent with the reduction in building size). As with the Project, operational regional emissions generated would exceed the SCAQMD CEQA significance threshold for NO_x with operation of one high cube warehouse. The emissions for this alternative would be approximately 89 lbs/day compared to approximately 152 lbs/day with the Project. As with the Project, even with implementation of applicable PVCCSP EIR mitigation measures and additional Project-level mitigation measures identified in Section 4.3 Air Quality, the amount of NO_x emissions reduction would not reduce emissions from an estimated 89 lbs/day to the 55 lbs/day threshold of significance. Therefore, operational emissions of NO_x resulting from the Reduced Development Area Alternative would be cumulatively considerable for O₃ resulting in a significant unavoidable cumulative impact. Therefore, although the operational air quality emissions would be reduced, there would be significant and unavoidable operational cumulative air quality impacts resulting from this alternative, as with the Project.

Biological Resources

The Reduced Development Area Alternative would generally involve the same physical impact area as the Project as shown on Figure 3-27, including impacts within the PVSD Channel. Although the Rider 4 building would not be constructed, soil excavated from the PVSD Channel would still be placed on the Rider 4 site to raise the site out of the 100-year flood plain. Therefore, this alternative would result in the same temporary and/or permanent impacts to biological resources (including potential impacts to nesting birds, disturbed southern riparian scrub, and jurisdictional areas) as the Project. With incorporation of the applicable PVCCSP EIR mitigation measures and Project-level mitigation measures, the impacts to biological resources would be less than significant with the Reduced Development Area Alternative and the Project.

Cultural Resources

There are no historic or known archeological resources in the Project area. Therefore, no impact to historic or known archeological resources would occur with implementation of the Reduced Development Area Alternative or the Project. With elimination of the Rider 4 building, the Reduced Development Area Alternative would eliminate excavation at the Rider 4 site, including for utility infrastructure. However, with implementation of the Rider 2 building and the PVSD Channel improvements, this alternative would result in the same potential impacts to unknown archaeological resources as the Project. With incorporation of the applicable PVCCSP EIR mitigation measures and Project-level mitigation measures, the Reduced Development Area Alternative would have similar, less than significant impacts as the Project related to cultural resources.

Energy

Implementation of the Reduced Development Area Alternative would result in lower energy demand during construction compared to the Project because of the reduction in building size. The Reduced Development Area Alternative would involve development of one industrial building totaling 804,759 sf, which is 547,977 sf less than the Project. This alternative would result also in reduced energy demand during operational activities. Therefore, the Reduced Development Area Alternative would have reduced energy impacts than the Project. However, the Reduced Development Area Alternative would have similar, less than significant impacts as the Project related to energy.

Geology and Soils

Even with elimination of the Rider 4 building, the Reduced Development Area Alternative, which would still involve the development of the Rider 2 building, would result in the same potential impacts related to geology and soils and seismic hazards as the Project. With adherence to applicable building codes and incorporation of the recommendations from the site-specific geotechnical studies, the Project would not expose people or structures to substantial safety risks associated with geologic hazards. Further, because this alternative would involve excavation activities for the Rider 2 building and the PVSD Channel improvements, this alternative would also have the same potential as the Project to impact subsurface paleontological resources, and the impact would be reduced to a less than significant level with mitigation. Therefore, with incorporation of the applicable PVCCSP EIR mitigation measures and Project-level mitigation measures, and adherence to applicable regulations, geology and soils impacts would be less than significant with implementation of the Reduced Development Area Alternative and the Project.

Greenhouse Gas Emissions

Implementation of the Reduced Development Area Alternative would result in lower energy demand during construction compared to the Project because of the reduction in building size and overall reduction in construction activities. The Reduced Development Area Alternative would involve development of one industrial building totaling 804,759 sf, which is 547,977 sf less than the Project. This alternative would result in reduced emissions from all operational GHG sources because the emissions from each source would vary in direct proportion to the building size. Total operational GHG emissions (which include energy, mobile, solid waste, and water consumption sources) resulting from this alternative are estimated to be approximately 7,914 MTCO₂e/yr (compared to 13,452.29 MTCO₂e/yr with

the Project). Therefore, the Reduced Development Area Alternative would have lower GHG emission impacts than the Project. The GHG emissions under this alternative would not exceed the SCAQMD's 10,000 MTCO₂e/yr screening threshold and the Reduced Development Area Alternative would reduce impacts to a less than significant level. Therefore, this alternative would avoid the significant and unavoidable cumulative GHG emissions impacts that would result with implementation of the Project.

Hazards and Hazardous Materials

Neither implementation of the Reduced Development Area Alternative nor the Project would result in a significant impact related to hazards or hazardous materials. Based on the location and condition of the Project area, the Reduced Development Area Alternative and the Project would have no impact associated with hazardous emissions within 0.25 mile of a school, location on a hazardous materials site, or wildland fire. Land uses that would occur on-site under the Reduced Development Area Alternative would have a similar potential to handle and store hazardous materials as the Project, and similar impacts related to hazards associated with the MARB/IPA, and emergency response/evacuation. With incorporation of the applicable PVCCSP EIR mitigation measures and mandatory regulatory compliance, both the Reduced Development Area Alternative and the Project would pose a less than significant hazard to the public or the environment related to hazards and hazardous materials.

Hydrology and Water Quality

While the Project involves the development of the Rider 2 and Rider 4 buildings, the drainage plan and preliminary WQMP for each building are site-specific and independent of each other. With the elimination of the Rider 4 site under this alternative, the increase in impervious area would be reduced; however, the PVSD Channel improvements and storm drain/water quality system for the Rider 2 building would remain the same. Therefore, this alternative would result in similar impacts related to hydrology and water quality as the Project.

Similar to the Project, development under this alternative would increase the amount of storm water runoff and alter existing drainage patterns due to the increase in the amount of impervious surfaces. As with the Project, application of BMPs and other regulatory requirements would ensure that impacts to hydrology and storm drain infrastructure from the Rider 2 building are less than significant. An on-site storm drain system would be constructed to detain flows such that they are released from the site at near pre-development levels and would not result in impacts to storm drain facilities or flooding. Additionally, the proposed PVSD Channel improvements would accommodate the 100-year flood conditions. As with the Project, with the incorporation of applicable PVCCSP Standards and Guidelines, regulatory requirements and Project-specific mitigation measures, the Reduced Development Area Alternative would have similar, less than significant impacts as the Project related to hydrology and flooding.

As with the Project, the Reduced Development Area Alternative would result in surface runoff after Project implementation. Even though the total amount of impervious area and amount of industrial development would be reduced, as with the Project, surface runoff from a developed condition (with either this alternative or the Project) would have a different composition in comparison to the existing condition, which is undeveloped. As with the Project, the runoff from the Rider 2 site is likely to include a similar amount and type of pollutants commonly found in urban runoff. The Project and this alternative would be required to comply with applicable regulations related to water quality, including, but not limited to the Municipal Separate Storm Sewer (MS4) and National Pollutant Discharge Elimination System (NPDES)

permit requirements, which would minimize potential short-term, construction-related and long-term, operational water quality impacts. With the incorporation of applicable PVCCSP Standards and Guidelines, and adherence to applicable requirements, the Reduced Development Area Alternative would have similar, less than significant impacts as the Project related to water quality during construction and operation.

As with the Project, the Reduced Development Area Alternative would not involve excavation at depths that would encounter groundwater, and would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

Land Use and Planning

The City of Perris General Plan land use and zoning designation for the Project area is “Specific Plan” for the PVCCSP. The PVCCSP serves as the regulatory document for future development in the Specific Plan area. The PVCCSP designates the Project area for Light Industrial uses and Future Perris Valley Storm Drain. As with the Project, the Reduced Development Area Alternative would result in the development of an industrial project and would implement planned regional PVSD Channel consistent with the PVCCSP. Under this alternative, the Project area would be developed in compliance with the relevant Standards and Guidelines outlined in the PVCCSP and would not result in significant land use impacts, as with the Project. The development of the Rider 2 building in the Project area would be consistent with the PVCCSP and relevant goals and policies of the City of Perris General Plan. The elimination of the Rider 4 building under this alternative would not preclude its implementation in the future, rather it would delay implementation of development of the Rider 4 site as anticipated in the PVCCSP. The Reduced Development Area Alternative would have similar, less than significant, impacts as the Project related to land use and planning.

The Reduced Development Area Alternative would not conflict with regional planning programs addressing operations at MARB, nor would it conflict with the SCAG’s RTP/SCS and Connect SoCal Plan. Development of the Project would also not conflict with these regional planning programs.

Noise

Because the type of construction activities and distance to the nearest sensitive receivers would be similar (the Rider 2 site and PVSD Channel improvement areas are closest to sensitive receivers), implementation of the Reduced Development Area Alternative would result in similar noise impacts during construction as the Project. Construction noise impacts would be less than significant, similar to the Project.

As identified previously, the Reduced Development Alternative, which would involve development of only the Rider 2 building, would generate fewer Project-generated trips than the Project (approximately 1,128 daily trips compared to 1,926 daily trips with the Project). The volume of daily trucks on the designated truck routes, including, but not limited to Harley Knox Boulevard, Redlands Avenue, and Indian would also be lower than the Project (364 trucks compared to 622 trucks), thereby reducing off-site noise levels from trucks. However, the reduction in truck trips would not eliminate the significant and unavoidable off-site traffic-related noise impacts. Similar to the Project, Project and cumulative off-site traffic noise impacts would be significant and unavoidable, and the decrease in noise impacts is not considered to be substantial.

With the Reduced Development Area Alternative, the operational noise impacts at the Rider 2 site would be the same as with the Project; however, there would be a reduction in the overall operational noise due to the elimination of operational activities at the Rider 4 site. Therefore, this alternative and the Project would have a less than significant impact related to operational noise.

As with the Project, the Reduced Development Area Alternative would not be subjected to substantial noise levels from MARB/IPA operations resulting in a less than significant impact.

Transportation

The Project area is within a low VMT area, which would not change under the Reduced Development Area Alternative. Therefore, as with the Project, development under this alternative would also have a less than significant VMT impact.

As with the Project, this alternative would incorporate applicable PVCCSP Standards and Guidelines related to transportation and circulation, including construction of adjacent roadways and access improvements necessary to serve the Project, and construction of improvements to encourage pedestrian and bicycle travel, and transit use. The Reduced Development Area Alternative and the Project would not conflict with applicable programs, plans, ordinances or policies addressing the circulation system; would not create hazards through design; and, would not result in inadequate emergency access. As with the Project, transportation impacts under this alternative would remain less than significant.

Tribal Cultural Resources

There are no known tribal cultural resources within the Project area; however, because the Reduced Development Area Alternative would involve excavation activities for the Rider 2 building and the PVSD Channel improvements, this alternative would have the same potential as the Project to impact subsurface tribal cultural resources, should they be present. With incorporation of the applicable PVCCSP EIR mitigation measures and Project-level mitigation measures, the Reduced Intensity Alternative would have similar, less than significant impacts as the Project related to tribal cultural resources.

Utilities and Service Systems

As with the Project, the Reduced Development Area Alternative would increase the water demand, wastewater generation, and electric demand at the Project site compared to existing conditions, where the site is undeveloped. Additionally, as discussed above under Hydrology and Water Quality, with respect to the Rider 2 site, the Reduced Development Area Alternative would generate a similar amount of storm water runoff as with the Project. Although the total building area and development area would be reduced, the overall utility infrastructure needed to serve the Rider 2 site would be the same as the Project and would be located within the same construction impact area as shown on Figure 3-27 for the Rider 2 site. Therefore, as with the Project, the Reduced Development Area Alternative would have similar, less than significant impacts as the Project related to the installation of utility infrastructure.

The PVCCSP EIR estimates water demand and wastewater generation based on the size of the development area (acres); therefore, the Reduced Development Area Alternative, which would have a reduced building development area compared to the Project (38.3 acres compared to 65 acres), would

have a reduced water demand and wastewater generation than the Project. Therefore, the conclusions of the Project-specific WSA would be applicable to this alternative, and the EMWD would have sufficient water to serve the Reduced Development Area Alternative. Similarly, there would be adequate capacity in EMWD wastewater treatment facilities to treat wastewater generated. The Reduced Development Area Alternative and Project would have less than significant impacts related to water supply and wastewater treatment.

As with the Project, construction and operation of industrial uses under the Reduced Development Area Alternative would comply with applicable local and state regulations related to solid waste management and diversion of solid waste from landfills. The Reduced Development Area Alternative and Project would have less than significant impacts related to solid waste.

Conclusions

Avoid or Substantially Lessen the Significant Impacts of the Project

Due to the 41 percent reduction in development area and building size with the Reduced Development Area Alternative, there would be a related reduction in construction activities and operational activities, including trip generation. While significant and unavoidable impacts cumulative GHG emissions would be eliminated with this alternative, significant and unavoidable cumulative impacts associated with construction and operational regional air quality impacts, and Project and cumulative off-site traffic-related noise impacts would be reduced, but not avoided. For all other topical areas, similar or reduced impact levels would occur with the Reduced Development Area compared to the Project. It should be noted that the reduction in development area associated with this alternative would delay, but would not avoid the future development of industrial uses on the Rider 4 site.

Attainment of Project Objectives

Following is a discussion of the Reduced Development Area Alternative's ability to attain the Project Objectives.

- 1. Implement the Perris Valley Commerce Center Specific Plan through development of land uses allowed by the Light Industrial land use designation and consistent with the Standards and Guidelines relevant to the Project area and proposed uses.** The Reduced Development Area Alternative would attain this objective, but less effectively than the Project since implementation of the allowed PVCCSP uses on the Rider 4 site would not be implemented.
- 2. Implement City of Perris General Plan policies and objectives relevant to the Project area and proposed industrial development.** The Reduced Development Area Alternative would attain this objective, but less effectively than the Project.
- 3. To expand economic development and facilitate job creation in the City of Perris by establishing a new industrial development area adjacent to an already-established industrial area, including the initial phase of the Rider Logistics Center.** The Reduced Development Area Alternative would meet this objective; however, the anticipated employment would be reduced compared to the Project. Therefore, although employment opportunities would be created, employment-generating development is not maximized under this alternative due to

the reduction in building size. The Reduced Development Area Alternative does not achieve this objective to the same extent as the Project.

4. **Maximize development of Class A speculative high cube warehouse industrial buildings in the Project area that meet contemporary industry standards for operational design criteria, can accommodate a wide variety of users, and are economically competitive with similar warehouse buildings in the local area and region, which will assist the City of Perris in competing economically on a domestic and international scale through the efficient and cost-effective movement of goods.** By limiting development to the 804,759-sf Rider 2 building, the Reduced Development Area Alternative would be 41 percent smaller than the Project. This alternative would not maximize development of the site based on the development standards outlined in the PVCCSP. Therefore, the Reduced Development Area Alternative would not achieve this objective.
5. **To attract new businesses to the City of Perris and thereby provide a more equal jobs-housing balance in the Riverside County/Inland Empire area that will reduce the need for members of the local workforce to commute outside the area for employment.** The Reduced Development Area Alternative would attain this objective, but less effectively than the Project since it would not generate as many employment opportunities.
6. **Provide for uses that will generate tax revenue for the City of Perris including, but not limited to, increased property tax, in order to support the City's ongoing municipal operations.** The Reduced Development Area Alternative, with elimination of the Rider 4 building, would not maximize development of the Project area and thus would not generate as much tax revenue as the Project. Therefore, the Reduced Development Area Alternative would not achieve this objective as effectively as the Project.
7. **Provide Class A high cube warehouses that take advantage of the area's proximity to various freeways and existing and planned transportation corridors to reduce traffic congestion on surface streets and to reduce concomitant air pollutant emissions from vehicle sources.** The Reduced Development Area Alternative would attain this objective.
8. **Accommodate new development in a phased, orderly manner that is coordinated with the provision of necessary infrastructure and public improvements.** The Reduced Development Area Alternative would attain this objective.
9. **Implement PVSD Channel Improvements anticipated by the PVCMDP and PVCCSP in conjunction with the adjacent Rider 2 and Rider 4 high cube warehouse buildings to accommodate the 100-year storm flows in the area.** The Reduced Development Area Alternative would attain this objective.
10. **To assist the SCAG region in achieving jobs/housing balance region-wide by providing additional job opportunities in a housing rich area of the Inland Empire.** The Reduced Intensity Alternative would attain this objective, but would not generate as many employment opportunities as the Project.

5.3.4 ALTERNATIVE 4: ALTERNATE USE COMPLIANT WITH THE PVCCSP

Description of the Alternative

Similar to the Reduced Development Area Alternative, the purpose of the Alternate Use Compliant with the PVCCSP (referred to herein as the Alternate PVCCSP Use Alternative) is to address significant and unavoidable impacts of the Project related to regional construction and operational air pollutant emissions, GHG emissions, and off-site traffic related noise. Under this alternative, the Rider 2 building and the PVSD Channel improvements (including the Rider Street bridge) would be implemented, consistent with the Project. However, an approximately 9-acre trailer storage yard would be implemented on the Rider 4 site, rather than the Rider 4 building (refer to the conceptual site plan provided on Figure 5-1, Rider 4 Site Alternate Use – Trailer Storage Yard).

The trailer storage yard, as an accessory use to the Rider 2 building, is allowed by the PVCCSP. As shown on Figure 5-1, the accessory trailer yard would be located in the western portion of the Rider 4 site along Redlands Avenue, and would accommodate approximately 320 trailer parking stalls (10 feet by 53 feet). Access could be provided from Morgan Street, which would also be constructed under this alternative or from Sinclair Street. No access would be provided from Redlands Avenue. An office area would be provided in the northern portion of the trailer storage yard, along with automobile parking. A screenwall would be provided along northern, western, and southern perimeters of the trailer yard. Landscaping and lighting would be installed in compliance with the Standards and Guidelines identified in the PVCCSP.

Under this alternative, the physical impact area for the Rider 2 and Rider 4 sites would be reduced from 69.5 acres to approximately 52 acres. The physical impact area associated with the PVSD Channel improvements would remain at 29.7 acres. Although the Rider 4 site would not be developed under this alternative, soil removed from the PVSD Channel would still be placed over the entire Rider 4 site.

Relevant to this alternatives analysis is the ADT generation. Applying the trip generation calculations presented in Table 5-1, the Alternate PVCCSP Use Alternative would result in a net reduction in ADT compared to the Project. This alternative would result in approximately 1,528 ADT compared to 1,926 ADT with the Project. However, the number of truck trips would increase from 622 average daily trips to 655 average daily trucks.

Comparative Analysis of Environmental Impacts

Aesthetics

Similar to the Project, development of the Alternate PVCCSP Use Alternative would alter the existing visual condition of the Project area through introduction of development on a previously vacant, undeveloped area. However, the Alternate PVCCSP Use Alternative would only develop the Rider 2 building and the western portion of the Rider 4 site. The trailer storage yard on the Rider 4 site would provide a larger buffer between the site and uses to the east, and would not introduce an industrial warehouse building. The Alternate PVCCSP Use Alternative, including the Rider 2 building, would comply with the Standards and Guidelines set forth in PVCCSP, as applicable including lot coverage, screening, architecture, lighting, signage, walls/fences, and landscaping. Further, the landscaping along Redlands Avenue and Rider Street, which are designated Major Roadway Visual Corridors in the PVCCSP, would

be similar to the Project. As with the Project landscaping and walls/fences would be used to visually screen the sites from vantage points to the east. It is expected that the overall visual appearance under this alternative would be similar to the Project and would not represent a significant impact. As with the Project, the development associated with the Alternate PVCCSP Use Alternative would comply with County of Riverside Ordinance No. 655, which addresses nighttime lighting that could affect the Palomar Observatory, and requirements set forth in the PVCCSP related to lighting and glare.

With incorporation of the applicable PVCCSP Standards and Guidelines and the Project-specific mitigation addressing construction activities, the Alternate PVCCSP Use Alternative would have similar, less than significant impacts as the Project related to aesthetics.

Table 5-1 Trip Generation Summary - Rider 4 Site Alternate Use Trailer Storage Yard

Project Trip Generation									
Project Land Use	Quantity	Units ²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Actual Vehicles									
Alternative Use: Trailer Yard/Storage	9,000	AC							
Passenger Cars:			2	2	4	7	4	11	102
Truck Trips:									
2-axle:			1	2	3	3	2	5	66
3-axle:			2	3	5	5	3	8	135
4+-axle:			5	8	13	11	6	17	352
- Net Truck Trips (Actual Vehicles)			8	13	21	19	11	30	553
TOTAL NET TRIPS (Actual Vehicles)			10	15	25	26	15	41	655
Passenger Car Equivalent									
Alternative Use: Trailer Yard/Storage	9,000	AC							
Passenger Cars:			2	2	4	7	4	11	102
Truck Trips:									
2-axle:			2	3	5	4	2	6	100
3-axle:			4	6	10	9	5	14	270
4+-axle:			14	23	37	33	17	50	1,051
- Net Truck Trips (PCE)			20	32	52	46	24	70	1,421
TOTAL NET TRIPS (PCE)			22	34	56	53	28	81	1,523

¹ Trip Generation Source: Mix for truck storage facilities obtained from City of San Bernardino.

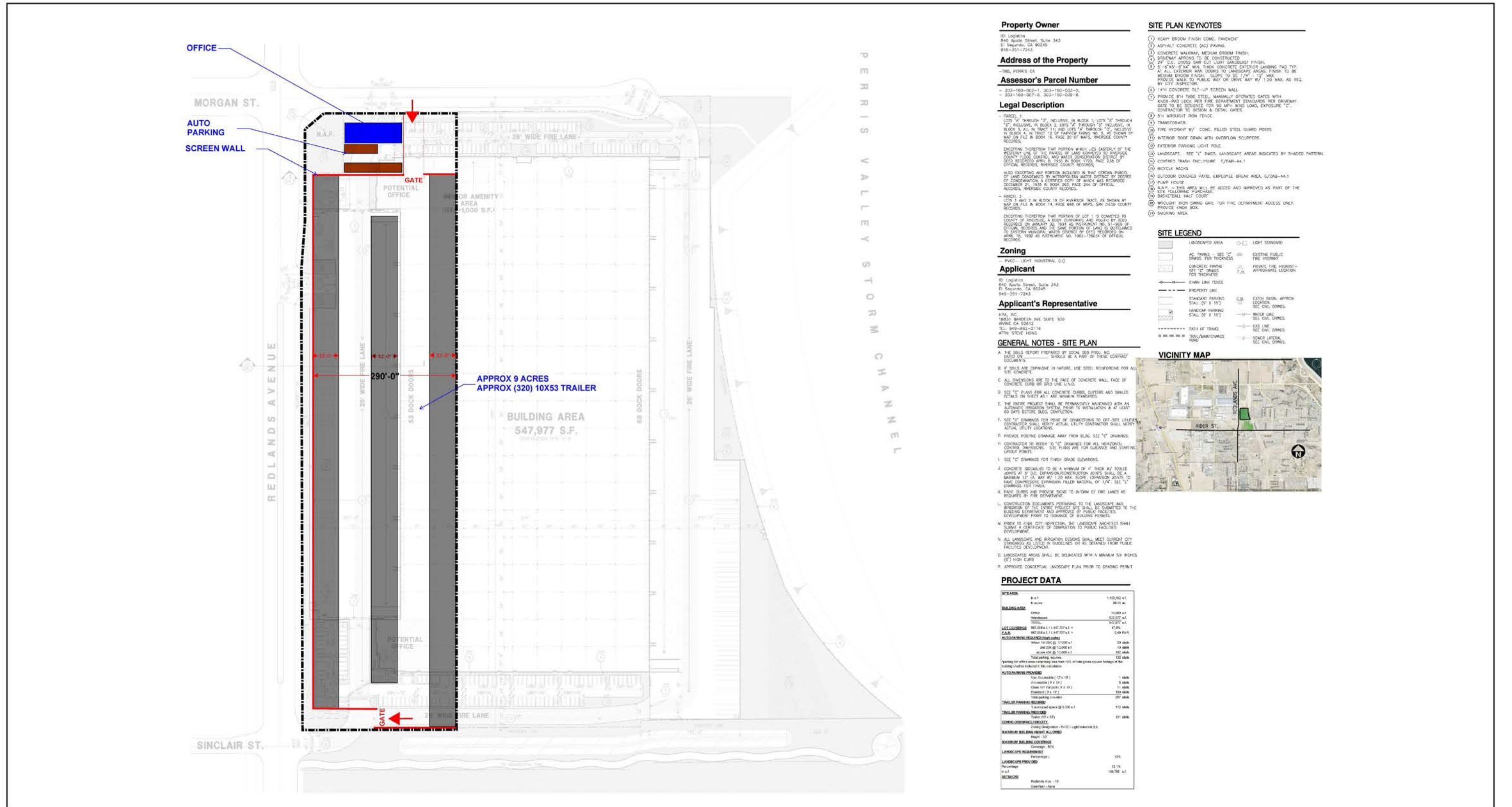
Truck Mix Source: Fontana Truck Trip Generation Study, 2003, Truck Terminals.

² AC = Acres

³ PCE factors: 2-axle = 1.5, 3-axle = 2.0, 4+-axle =3.0

Agriculture and Forestry Resources

The Alternate PVCCSP Use Alternative would reduce the physical impact area as compared to the Project, and would reduce impacts to Farmland of Statewide Importance that occurs on the Rider 4 site. Therefore, this alternative would result in less impacts to Farmland of Statewide Importance compared to the Project; however, the development of the Rider 2 site and 9-acres on the Rider 4 site under the Alternate PVCCSP Use Alternative would still result in the conversion of Farmland of Statewide Importance to non-agricultural uses. The Alternate PVCCSP Use Alternative and the Project would have less than significant impacts to agriculture resources, and no impact to forestry resources.



Source(s): HPA (07-14-2020)

Figure 5-1



Rider 4 Site Alternate Use – Trailer Storage Yard

Air Quality

As with the Project, development of the Alternate PVCCSP Use Alternative would result in less than significant impacts related to sensitive receptors including health risk because the total trip generation would be lower than that for the Project and there would be a slight increase in truck trips. Therefore, localized emissions of diesel particulate matter and toxic air contaminants would be similar. As with the Project, the Alternate PVCCSP Use Alternative would be consistent with PVCCSP and would be consistent with the vehicular trips anticipated in the AQMP, thereby resulting in a less than significant impact related to consistency with the AQMP.

Implementation of the Alternate PVCCSP Use Alternative would have a reduced construction impact area as the Project and construction emission would likely be reduced. However, construction of the Rider 2 building and trailer storage yard would still overlap with construction of the PVSD Channel improvements, including the Rider Street bridge. As discussed in Section 4.3, Air Quality, of this EIR, the NO_x exceedance from the Project is primarily due to the overlap in construction activities. As previously discussed, NO_x is an O₃ precursor, which is a nonattainment pollutant. Therefore, this alternative would reduce but not avoid the significant and unavoidable regional construction-related air quality impacts resulting from the Project.

Due to the reduction in trip generation, the total operational emissions would also be reduced. The majority of the operational emissions are associated with mobile sources. Therefore, when taking into consideration the reduction in ADT, it estimated that operational NO_x emissions would be less than that Project (approximately 152 lbs/day) but would still exceed the SCAQMD CEQA significance threshold for NO_x (55 lbs/day), even with implementation of applicable PVCCSP EIR mitigation measures and additional Project-level mitigation measures identified in Section 4.3. Therefore, operational emissions of NO_x resulting from the Alternate PVCCSP Use Alternative would be cumulatively considerable for O₃ resulting in a significant unavoidable cumulative impact. Although the operational air quality emissions would be reduced, there would be significant and unavoidable operational cumulative air quality impacts resulting from this alternative, as with the Project, and the decrease in emission is not considered to be substantial.

Biological Resources

The Alternate PVCCSP Use Alternative would generally involve the same physical impact area as the Project as shown on Figure 3-27, including impacts within the PVSD Channel. Although the development area on the Rider 4 building site would be reduced with the 9-acre trailer storage yard, soil excavated from the PVSD Channel would still be placed on the Rider 4 site to raise the site out of the 100-year flood plain. Therefore, this alternative would result in the same temporary and/or permanent impacts to biological resources (including potential impacts to nesting birds, disturbed southern riparian scrub, and jurisdictional areas) as the Project. With incorporation of the applicable PVCCSP EIR mitigation measures and Project-level mitigation measures, the impacts to biological resources would be less than significant with the Alternate PVCCSP Use Alternative and the Project.

Cultural Resources

There are no historic or known archeological resources in the Project area. Therefore, no impact to historic or known archeological resources would occur with implementation of the Alternate PVCCSP

Use Alternative or the Project. However, as with the Project, this alternative would result in potential impacts to unknown archaeological resources. With incorporation of the applicable PVCCSP EIR mitigation measures and Project-level mitigation measures, this alternative would have similar, less than significant impacts as the Project related to cultural resources.

Energy

Implementation of the Alternate PVCCSP Use Alternative would result in lower energy demand during construction compared to the Project because of the reduction in building size. The Alternate PVCCSP Use Alternative would involve development of one industrial building totaling 804,759 sf (Rider 2 building), which is 547,977 sf less than the Project, and a small office to support the trailer storage yard. This alternative would result also in reduced energy demand during operational activities. Therefore, the Alternate PVCCSP Use Alternative would have reduced energy impacts than the Project. However, the Alternate PVCCSP Use Alternative would have similar, less than significant impacts as the Project related to energy.

Geology and Soils

Even with elimination of the Rider 4 building, the Alternate PVCCSP Use Alternative, which would still involve the development of the Rider 2 building and a 9-acre trailer storage yard on the Rider 4 site, would result in the same potential impacts related to geology and soils and seismic hazards as the Project. With adherence to applicable building codes and incorporation of the recommendations from the site-specific geotechnical studies, the Project would not expose people or structures to substantial safety risks associated with geologic hazards. Further, because this alternative would involve excavation activities, this alternative would have the same potential as the Project to impact subsurface paleontological resources, and the impact would be reduced to a less than significant level with mitigation. Therefore, with incorporation of the applicable PVCCSP EIR mitigation measures and Project-level mitigation measures, and adherence to applicable regulations and geotechnical recommendations, geology and soils impacts would be less than significant with implementation of the Alternate PVCCSP Use Alternative and the Project.

Greenhouse Gas Emissions

Implementation of the Alternate PVCCSP Use Alternative would result in lower energy demand during construction compared to the Project because of the reduction in building size and overall reduction in construction activities. The Alternate PVCCSP Use Alternative would involve development of one industrial building totaling 804,759 sf, which is 547,977 sf less than the Project, and a 9-acre trailer storage yard, which would generate more average daily truck trips than the Project. The Project would generate up to approximately 13,452 MTCO₂e/yr of GHG emissions. This alternative would result in reduced emissions from all operational GHG sources compared to the Project; however, because the majority of GHG emissions from the Project (85 percent) are from mobile sources (approximately 11,355 MTCO₂e/yr), the reduction in ADT with this alternative (with an increase in truck trips) would still exceed the SCAQMD's 10,000 MTCO₂e/yr screening threshold. Therefore, this alternative would reduce, but not avoid, the significant and unavoidable cumulative GHG emissions impacts resulting from the Project and the decrease in GHG emissions is not considered to be substantial.

Hazards and Hazardous Materials

Neither implementation of the Alternate PVCCSP Use Alternative nor the Project would result in a significant impact related to hazards or hazardous materials. Based on the location and condition of the Project area, the Alternate PVCCSP Use Alternative and the Project would have no impact associated with hazardous emissions within 0.25 mile of a school, location on a hazardous materials site, or wildland fire. Land uses that would occur on-site under the Alternate PVCCSP Use Alternative would have a similar potential to handle and store hazardous materials as the Project, and similar impacts related to hazards associated with the MARB/IPA, and emergency response/evacuation. With incorporation of the applicable PVCCSP EIR mitigation measures and mandatory regulatory compliance, both the Alternate PVCCSP Use Alternative and the Project would pose a less than significant hazard to the public or the environment related to hazards and hazardous materials.

Hydrology and Water Quality

While the Project involves the development of the Rider 2 and Rider 4 buildings, the drainage plan and preliminary WQMP for each building are site-specific and independent of each other. With the replacement of the Rider 4 building with a 9-acre trailer storage yard, the increase in impervious area would be reduced with this alternative. However, in accordance with applicable regulations, the trailer storage yard would be designed with a storm drain system that would ensure impacts related to hydrology are less than significant. Additionally, the PVSD Channel improvements and storm drain/water quality system for the Rider 2 building would remain the same. Therefore, this alternative would result in similar impacts related to hydrology and water quality as the Project.

Similar to the Project, development under this alternative would increase the amount of storm water runoff and alter existing drainage patterns due to the increase in the amount of impervious surfaces. As with the Project, application of BMPs and other regulatory requirements would ensure that impacts to hydrology and storm drain infrastructure from the Rider 2 and Rider 4 sites are less than significant. An on-site storm drain system would be constructed to detain flows such that they are released from the sites at near pre-development levels and would not result in impacts to storm drain facilities or flooding. Additionally, the proposed PVSD Channel improvements would accommodate the 100-year flood conditions. As with the Project, with the incorporation of applicable PVCCSP Standards and Guidelines, regulatory requirements and Project-specific mitigation measures, the Alternate PVCCSP Use Alternative would have similar, less than significant impacts as the Project related to hydrology and flooding.

As with the Project, the Alternate PVCCSP Use Alternative would result in surface runoff after Project implementation. Even though the total amount of impervious area and amount of industrial development would be reduced, as with the Project, surface runoff from a developed condition (with either this alternative or the Project) would have a different composition in comparison to the existing condition, which is undeveloped. As with the Project, the runoff from the Rider 2 site is likely to include a similar amount and type of pollutants commonly found in urban runoff. The Project and this alternative would be required to comply with applicable regulations related to water quality, including, but not limited to the Municipal Separate Storm Sewer (MS4) and National Pollutant Discharge Elimination System (NPDES) permit requirements, which would minimize potential short-term, construction-related and long-term, operational water quality impacts. With the incorporation of applicable PVCCSP Standards and Guidelines, and adherence to applicable requirements, the Alternate PVCCSP Use Alternative would

have similar, less than significant impacts as the Project related to water quality during construction and operation.

As with the Project, the Alternate PVCCSP Use Alternative would not involve excavation at depths that would encounter groundwater, and would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

Land Use and Planning

The City of Perris General Plan land use and zoning designation for the Project area is “Specific Plan” for the PVCCSP. The PVCCSP serves as the regulatory document for future development in the Specific Plan area. The PVCCSP designates the Project area for Light Industrial uses and Future Perris Valley Storm Drain. As with the Project, the Alternate PVCCSP Use Alternative would result in the development of industrial uses allowed by the PVCCSP in areas designated Light Industrial, and would implement planned regional PVSD Channel consistent with the PVCCSP. Under this alternative, the Project area would be developed in compliance with the relevant Standards and Guidelines outlined in the PVCCSP and would not result in significant land use impacts, as with the Project. This alternative would be consistent with the PVCCSP and relevant goals and policies of the City of Perris General Plan. The Alternate PVCCSP Use Alternative would have similar, less than significant, impacts as the Project related to land use and planning.

The Alternate PVCCSP Use Alternative would not conflict with regional planning programs addressing operations at MARB, nor would it conflict with the SCAG’s RTP/SCS and Connect SoCal Plan. Development of the Project would also not conflict with these regional planning programs.

Noise

Because the type of construction activities and distance to the nearest sensitive receivers would be similar (the Rider 2 site and PVSD Channel improvement areas are closest to sensitive receivers), implementation of the Alternate PVCCSP Use Alternative would result in similar noise impacts during construction as the Project. Construction noise impacts would be less than significant, similar to the Project.

As identified previously, the Alternate PVCCSP Use Alternative would result in a net reduction in ADT compared to the Project. This alternative would result in approximately 1,528 ADT compared to 1,926 ADT with the Project. However, the number of truck trips would decrease from 622 average daily trips to 553 average daily trucks. Therefore, the volume of trucks on the designated truck routes, including, but not limited to Harley Knox Boulevard, Redlands Avenue, and Indian would be lower than with the Project, thereby reducing off-site noise levels from trucks. However, the reduction in truck trips would not eliminate the significant and unavoidable off-site traffic-related noise impacts. Similar to the Project, Project and cumulative off-site traffic noise impacts would be significant and unavoidable under this alternative, and the decrease in noise impacts is not considered to be substantial.

With the Alternate PVCCSP Use Alternative, the operational noise impacts at the Rider 2 site would be the same as with the Project. The trailer storage yard would also generate noise; however, the distance to sensitive receivers is increased with the trailer storage yard located in the western portion of the Rider

4 site. Therefore, this alternative and the Project would have a less than significant impact related to operational noise.

As with the Project, the Alternate PVCCSP Use Alternative would not be subjected to substantial noise levels from MARB/IPA operations resulting in a less than significant impact.

Transportation

The Project area is within a low VMT area, which would not change under the Alternate PVCCSP Use Alternative. Therefore, as with the Project, development under this alternative would also have a less than significant VMT impact.

As with the Project, this alternative would incorporate applicable PVCCSP Standards and Guidelines related to transportation and circulation, including construction of adjacent roadways and access improvements necessary to serve the Project, and construction of improvements to encourage pedestrian and bicycle travel, and transit use. The Alternate PVCCSP Use Alternative and the Project would not conflict with applicable programs, plans, ordinances or policies addressing the circulation system; would not create hazards through design; and, would not result in inadequate emergency access. As with the Project, transportation impacts under this alternative would remain less than significant.

Tribal Cultural Resources

There are no known tribal cultural resources within the Project area; however, because the Alternate PVCCSP Use Alternative would involve excavation activities, this alternative would have the same potential as the Project to impact subsurface tribal cultural resources, should they be present. With incorporation of the applicable PVCCSP EIR mitigation measures and Project-level mitigation measures, the Reduced Intensity Alternative would have similar, less than significant impacts as the Project related to tribal cultural resources.

Utilities and Service Systems

As with the Project, the Alternate PVCCSP Use Alternative would increase the water demand, wastewater generation, and electric demand at the Project site compared to existing conditions, where the site is undeveloped. Additionally, as discussed above under Hydrology and Water Quality, with respect to the Rider 2 site, the Alternate PVCCSP Use Alternative would generate a similar amount of storm water runoff as with the Project. A 9-acre trailer storage yard at the Rider 4 site would create less impervious area, and associated runoff. Although the total building area and development area would be reduced, the overall utility infrastructure needed to serve the Rider 2 site would be the same as the Project and, any development on the Rider 4 site would also require infrastructure as none currently exists. The physical impacts would be within the construction impact area as shown on Figure 3-27. Therefore, as with the Project, the Alternate PVCCSP Use Alternative would have similar, less than significant impacts as the Project related to the installation of utility infrastructure.

The PVCCSP EIR estimates water demand and wastewater generation based on the size of the development area (acres); therefore, the Alternate PVCCSP Use Alternative, which would have a reduced development area compared to the Project, would have a reduced water demand and wastewater generation than the Project. Therefore, the conclusions of the Project-specific WSA would

be applicable to this alternative, and the EMWD would have sufficient water to serve the Alternate PVCCSP Use Alternative. Similarly, there would be adequate capacity in EMWD wastewater treatment facilities to treat wastewater generated. The Alternate PVCCSP Use Alternative and Project would have less than significant impacts related to water supply and wastewater treatment.

As with the Project, construction and operation of industrial uses under the Alternate PVCCSP Use Alternative would comply with applicable local and state regulations related to solid waste management and diversion of solid waste from landfills. The Alternate PVCCSP Use Alternative and Project would have less than significant impacts related to solid waste.

Conclusions

Avoid or Substantially Lessen the Significant Impacts of the Project

Due to the reduction in development area and overall industrial building area with the Alternate PVCCSP Use Alternative, there would be a related reduction in construction activities and operational activities, including trip generation, although the number of truck trips would increase. Significant and unavoidable cumulative impacts associated with construction and operational regional air quality impacts, cumulative GHG emissions, and Project and cumulative off-site traffic-related noise impacts, would be reduced, but not eliminated, and these decreases in significant and unavoidable impacts are not considered substantial. For all other topical areas, similar or reduced impact levels would occur with the Reduced Development Area compared to the Project.

Attainment of Project Objectives

Following is a discussion of the PVCCSP Use Alternative's ability to attain the Project Objectives.

- 1. Implement the Perris Valley Commerce Center Specific Plan through development of land uses allowed by the Light Industrial land use designation and consistent with the Standards and Guidelines relevant to the Project area and proposed uses.** The Alternate PVCCSP Use Alternative would attain this objective, but less effectively than the Project since the majority of the Rider 4 site would be underutilized.
- 2. Implement City of Perris General Plan policies and objectives relevant to the Project area and proposed industrial development.** The Alternate PVCCSP Use Alternative would attain this objective, but less effectively than the Project. The Alternate PVCCSP Use Alternative would not develop the Project area to the fullest extent per the General Plan land use.
- 3. To expand economic development and facilitate job creation in the City of Perris by establishing a new industrial development area adjacent to an already-established industrial area, including the initial phase of the Rider Logistics Center.** The Alternate PVCCSP Use Alternative would reduce the anticipated employment when compared to the Project due to the reduced scale and type of development (one warehouse building and a trailer yard). Therefore, although employment opportunities would be created, employment-generating development is not maximized under this Alternative due to the reduced scale of development. The Alternate PVCCSP Use Alternative does not achieve this objective to the same extent as the Project.

4. **Maximize development of Class A speculative high cube warehouse industrial buildings in the Project area that meet contemporary industry standards for operational design criteria, can accommodate a wide variety of users, and are economically competitive with similar warehouse buildings in the local area and region, which will assist the City of Perris in competing economically on a domestic and international scale through the efficient and cost-effective movement of goods.** By limiting development to the Rider 2 building and a trailer storage yard on the Rider 4 site, the Alternate PVCCSP Use Alternative would not maximize development of the site. Therefore, the Reduced Development Area Alternative would not achieve this objective.
5. **To attract new businesses to the City of Perris and thereby provide a more equal jobs-housing balance in the Riverside County/Inland Empire area that will reduce the need for members of the local workforce to commute outside the area for employment.** The Alternate PVCCSP Use Alternative would attain this objective, but less effectively than the Project due to the reduced scale and type of development.
6. **Provide for uses that will generate tax revenue for the City of Perris including, but not limited to, increased property tax, in order to support the City's ongoing municipal operations.** The Alternate PVCCSP Use Alternative, with implementation of a trailer storage yard on the Rider 4 site instead of an industrial warehouse building, would not maximize development of the Project area and thus would not generate as much tax revenue as the Project. Therefore, the Alternate PVCCSP Use Alternative would not achieve this objective as effectively as the Project.
7. **Provide Class A high cube warehouses that take advantage of the area's proximity to various freeways and existing and planned transportation corridors to reduce traffic congestion on surface streets and to reduce concomitant air pollutant emissions from vehicle sources.** The Alternate PVCCSP Use Alternative would attain this objective.
8. **Accommodate new development in a phased, orderly manner that is coordinated with the provision of necessary infrastructure and public improvements.** The Alternate PVCCSP Use Alternative would attain this objective.
9. **Implement PVSD Channel Improvements anticipated by the PVCMDP and PVCCSP in conjunction with the adjacent Rider 2 and Rider 4 high cube warehouse buildings to accommodate the 100-year storm flows in the area.** The Alternate PVCCSP Use Alternative would attain this objective.
10. **To assist the SCAG region in achieving jobs/housing balance region-wide by providing additional job opportunities in a housing rich area of the Inland Empire.** The Reduced Intensity Alternative would attain this objective, but would not generate as many employment opportunities as the Project due to the reduced scale and type of development.

5.4 COMPARISON OF PROJECT ALTERNATIVES

Based on the preceding analysis, Table 5-2, Comparison of Alternatives to the Project, compares the impacts of the alternatives with those of the Project. This table identifies whether the alternative results in: (1) a reduction of the impact; (2) a greater impact than the Project; or (3) a similar impact as the Project. The impact of the respective alternatives is identified followed parenthetically by the comparison to the impact of the Project.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. Section 15126.6(e)(2) of the CEQA Guidelines states that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

The No Project/No Development Alternative has the least impact to the environment because it would not involve any construction activities or warehouse operations. There would be no impacts associated with a cumulatively considerable increase of NO_x (an O₃ precursor) during construction and operation, no cumulative impacts related to GHG emissions, and no off-site traffic-related noise impacts. These impacts are considered significant and unavoidable for the Project. While this alternative would avoid the significant effects of the Project, it would not be consistent with the General Plan, zoning, or PVCCSP, resulting in a significant land use impact, and would not involve implementation of planned regional PVSD Channel improvements, which are needed to address flooding issues. Additionally, none of the Project objectives would be met.

With regard to the remaining development alternatives, the Reduced Intensity, Reduced Development Area, and Alternate PVCCSP Use alternatives are each environmentally superior to the Project. As shown in Table 5-2, the Reduced Development Area Alternative would have less impacts for more impact categories compared to the Reduced Intensity and PVCC Alternatives, and would be considered the environmentally superior alternative. The reduction in impacts for the Reduced Development Area Alternative is due to that fact that this alternative is limited to just construction of the Rider 2 building, which would reduce the physical impact area, and would reduce the overall building area by approximately 41 percent. Therefore, there would be a corresponding reduction in operational impacts, including trip generation. The reduction in the size of the Project area reduces construction related impacts (e.g., air pollutant and GHG emissions), reduces the amount of Farmland converted to non-agricultural uses, and reduces the off-site traffic-related noise impacts. The Reduced Development Area Alternative would avoid the Project's significant and unavoidable impact to GHG emissions. However, it would not avoid the Project's significant unavoidable impacts related to air quality (operational and cumulative) and off-site traffic-related noise. For the other impact categories, the level of impact would be similar or slightly reduced as compared to the Project. It should be noted that the Reduced Development Area Alternative would delay, but not eliminate the ultimate development (and potential environmental impacts associated with development) of the Rider 4 site, and thus the reduced impacts of the Reduced Development Area Alternative would be somewhat smaller, when compared to the Project, because development of the property where this Alternative is situated likely would take place in the future. The Reduced Development Area Alternative would attain the Project objectives, but not to the same extent as the Project as there would be less employment generation and less economic benefit to the City.

Table 5-2 Comparison of Alternatives to the Project

Impact Area	Project	No Project/ No Development (Alternative 1)	Reduced Intensity (Alternative 2)	Reduced Development Area/One Building Rider 2 (Alternative 3)	Alternate PVCCSP Use Trailer Storage Yard (Alternative 4)
Aesthetics	LS	No Impact (less)	LS (similar)	LS (similar)	LS (similar)
Agricultural Resources	LS	No Impact (less)	LS (similar)	LS (less)	LS (less)
Air Quality					
Construction	SU	No Impact (less)	LS (less)	SU (less)	SU (less)
Operation	SU	No Impact (less)	SU (less)	SU (less)	SU (less)
Biological Resources	LS	No Impact (less)	LS (similar)	LS (less)	LS (less)
Cultural Resources	LS	No Impact (less)	LS (similar)	LS (similar)	LS (similar)
Energy	LS	No Impact (less)	LS (similar)	LS (less)	LS (less)
Geology and Soils	LS	No Impact (less)	LS (similar)	LS (similar)	LS (similar)
Greenhouse Gas Emissions (Cumulative)	SU	No Impact (less)	SU (less)	LS (less)	SU (less)
Hazards and Hazardous Materials	LS	No Impact (less)	LS (similar)	LS (similar)	LS (similar)
Hydrology and Water Quality	LS	No Impact (greater)	LS (similar)	LS (similar)	LS (similar)
Land Use and Planning	LS	SU (greater)	LS (similar)	LS (similar)	LS (similar)
Noise					
Construction	LS	No Impact (less)	LS (similar)	LS (similar)	LS (similar)
On-site Operations	LS	No Impact (less)	LS (similar)	LS (less)	LS (less)
Off-site Traffic-Related	SU	No Impact (less)	SU (less)	SU (less)	SU (less)
Transportation	LS	No Impact (less)	LS (similar)	LS (similar)	LS (similar)
Tribal Cultural Resources	LS	No Impact (less)	LS (similar)	LS (similar)	LS (similar)
Utilities and Service Systems	LS	No Impact (less)	LS (similar)	LS (less)	LS (less)
LS: Less Than Significant, SU: Significant and Unavoidable					

5.6 REFERENCES

City of Perris, 2005. *Perris Comprehensive General Plan 2030*. Approved April 26, 2005.

City of Perris, 2018. *Perris Valley Commerce Center Amendment No. 9 Specific Plan*. Adopted January 10, 2012 and subsequently amended and approved August 28, 2018.

6.0 OTHER CEQA CONSIDERATIONS

Section 15126 of the Guidelines for the Implementation of the California Environmental Quality Act (CEQA) (State CEQA Guidelines) requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. It also sets forth general content requirements for environmental impact reports (EIRs). Potential significant effects of the proposed IDI Rider 2 & 4 Warehouses and PVSD Channel Improvement Project (Project); mitigation measures to address these effects and potential cumulative impacts have been identified throughout the analysis presented in Sections 4.1 through 4.15 of this EIR. An analysis of alternatives is included in Section 5.0, Alternatives.

This section provides: (1) a summary of effects determined not to be significant, (2) identification of significant environmental effects that cannot be avoided if the Project is implemented, (3) identification of significant irreversible environmental changes that would result from implementing the Project, and (4) growth-inducing impacts of the Project.

6.1 EFFECTS DETERMINED NOT TO BE SIGNIFICANT

Section 15128 of the State CEQA Guidelines states that “an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR”. The Notice of Preparation (NOP) for this EIR, included in Appendix A, identified environmental issues for which it was determined the Project would result in no impact or less than significant impacts. This included the following topical issues: Mineral Resources, Population and Housing, and Wildfire. Based on further review of the Project it was also concluded that the Project, which does not involve residential uses, would not result in physical environmental impacts related to Public Services or Recreation.

As discussed in Section 2.0 and described in Section 3.0 of this EIR, the Project implements and is consistent with the *Perris Valley Commerce Center Specific Plan (PVCCSP)* (amended though July 2018) (City of Perris, 2018). As such, and as further discussed below, the findings contained in the *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (PVCCSP EIR)* (State Clearinghouse No. 2009081086), are also applicable to the Project, and it can be concluded that implementation of the Project would not result in significant impacts for the environmental issues discussed below, consistent with the conclusions of the PVCCSP EIR (City of Perris, 2011).

6.1.1 MINERAL RESOURCES

Figure OS-6 of the Riverside County General Plan and the California Department of Conservation’s Mineral Land Classification for the area shows that the Project area is located within Mineral Resource Zone 3 (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 (DOGGR) Well Finder. No sites within the City of Perris City limits have been designated as locally important mineral resource recovery sites in the City of Perris General Plan or the Riverside County General Plan. Accordingly, no impact to the availability of a regionally or locally important mineral resource would occur. No impacts are anticipated.

6.1.2 POPULATION AND HOUSING

The Project area is currently undeveloped and construction of the Project would not require the construction of replacement housing, and would not displace any existing housing or residents. The Project does not involve the development of residential uses and would not directly increase the resident population, but the Project would create jobs and increase employment in the City of Perris. 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 a Project. The Project would create short-term jobs during the construction phase. These short-term positions would be filled by workers who, for the most part, would already reside in the local area; therefore, construction of the Project would not generate a substantial temporary or permanent increase in population within the Project area.

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. As this relates to industrial uses, one employee per 1,030 sf is estimated for Light Industrial floor space. The Project consists of the construction and operation of up to 1,352,736 sf of warehouse/distribution uses, which are allowed under the Light Industrial Specific Plan land use designation. Based on this generation factor, the Project could employ approximately 1,313 new employment opportunities. The PVCCSP EIR estimates that implementation of the land uses allowed under the PVCCSP would result in the generation of approximately 56,087 jobs/employees in the area (see Table 4.8-E under Section 4.8, Land Use and Planning, and the discussion of "Growth Inducing Impacts" in Section 5 of the PVCCSP EIR). Therefore, the employment generation estimated for the Project (1,313 employees) represents approximately 2.3 percent of the total employment generation anticipated in the Specific Plan area. Further, this represents approximately 4.1 percent of the City's projected employment base by 2040 as presented in the Southern California Association of Governments (SCAG) 2016 Regional Transportation/Sustainable Communities Strategy (RTP/SCS). Additionally, similar to the short-term construction jobs, it is anticipated that these new warehouse/distribution positions would be filled by workers who would already reside in the local area. The Project would involve the installation of utilities necessary to connect to existing infrastructure systems adjacent to or in the vicinity of the Project area and would involve improvements to adjacent roadways, consistent with the PVCCSP. Additionally, the Project would involve the construction of PVSD Channel improvements consistent with the Perris Valley Channel Master Drainage Plan (PVCMDP). Therefore, the Project would not directly or indirectly generate substantial unplanned population growth in the area.

6.1.3 PUBLIC SERVICES

The PVCCSP EIR Initial Study concluded that implementation of development allowed by the PVCCSP, which includes the Project, would result in less than significant impacts to public services. Further, in accordance with the State CEQA Guidelines, the Project's NOP was circulated for public review and comment and a public scoping meeting with the City of Perris Planning Commission was held; the NOP was transmitted to the agencies that provide public services to the site. No comments regarding public services were provided at the public scoping meeting for this EIR. Written comments were received from the California Department of Forest and Fire Protection (CAL FIRE)/Riverside County Fire Department (RCFD); however, the no comments regarding the Project were provided. Based on further review, the City of Perris has concluded that the Project would not result in potentially significant impacts to public services as discussed below.

- **Fire Protection.** While implementation of the Project would not involve new residential uses or uses that would increase the City's population, the operation of two new warehouses would increase the demand for fire protection, prevention, and emergency medical services at the currently undeveloped sites. CAL FIRE, under contract with Riverside County and operating as RCFD, provides fire prevention and suppression to the City of Perris. RCFD Station No.1 located at 210 W. San Jacinto Avenue and RCFD Station No. 90 at 333 Placentia Avenue exclusively serve the City of Perris. RCFD Station No. 1 is approximately 4.2 roadway miles southwest of the Project area. RCFD Station No. 90 is approximately 0.6 roadway miles south of the Project area. Other RCFD stations respond to emergency service calls in the City on an as-needed basis. According to the National Fire Protection Association (NFPA), the Project meets the "urban" land use category, which requires a 9-minute total response time (NFPA, 2019a; NFPA, 2019b). Due to the distance of the Project to RCFD Station No. 90, it is anticipated that this fire station would provide first response to the Project. The development of the Project would not cause fire staffing, facilities, or equipment to operate at a deficient level of service. Additionally, the proposed project would be required to pay North Perris Road and Bridge Benefit District (NPRBBD) fees, inclusive of the City's Development Impact Fee (DIF), which provides a funding source for construction of fire facilities as a result of impacts related to future growth in the City. The Project would not require the construction of new or expanded fire protection facilities; therefore, no physical impacts would result and the impact would be less than significant.
- **Police Protection.** While implementation of the Project would not involve new residential uses or uses that would increase the City's population, the operation of two new warehouses would increase the demand for police protection services at the currently undeveloped sites. The Project would be designed and operated in compliance with the standards provided within the City's Municipal Code, Riverside County Sheriff's Department (RCSD), and the PVCCSP for new development in regards to public safety. RCSD, under contract with the City of Perris and operating as the Perris Police Department, provides law enforcement services to the City. The Perris Police Station is located at 137 N. Perris Boulevard and is located approximately 3.0 roadway miles southwest of the Project area. Sheriff response times vary by time of day and priority of the call. Average response time from dispatch to on-scene arrival for Priority I¹ calls as of August 2019 was 9.44 minutes and for Priority IA² calls as of August 2019 was 6.76 minutes (Grimm, 2019). Although the Project would introduce new uses to the site, the Project Applicant would be required to pay into the City's NPRBBD, inclusive of the City's DIF, which provides a funding source for construction of police facilities as a result of impacts related to future growth in the City. The Project would not require the construction of new or expanded police protection facilities; therefore, no physical impacts would result and the impact would be less than significant.
- **Schools.** The Project area is located with the Val Verde Unified School District (VVUSD). This school district covers 67 square miles in Riverside County, and is comprised of 21 schools serving pre-kindergarten through 12th grade (VVUSD, 2020). The Project area is within the service area for the following schools: May Ranch Elementary, Sierra Vista Elementary School (6th grade), Lake Side Middle School, and Orange Vista High School. The proposed project would not directly

¹ Priority I Calls: Emergency call which requires immediate response and there exists an immediate and substantial risk of major property loss or damage.

² Priority IA Calls: Emergency call which requires immediate response and there is reason to believe that an immediate threat to life exists.

create a source of students, as the project does not involve the development of residential land uses. Therefore, no direct impact on school services or facilities would occur and there would be need for new or expanded school facilities. Additionally, appropriate developer impact fees, as required by State law, shall be assessed and paid to the school district. With the payment of these required fees and with no additional students generated from the Project, no significant impacts to school services would result.

- **Parks.** The City of Perris Community Services Department provides community services and recreational and leisure time opportunities and is responsible for the planning, development, and maintenance of the City's parks and recreational facilities. The Project area currently does not contain any parkland or recreational facilities. The nearest park is Morgan Park Phase 1 located to the northeast and includes the following amenities: barbecues, basketball court, group shelter, parking lot, picnic tables, playground, restrooms, snack bar, soccer field, and walking trail (City of Perris, 2020). Additionally, the City plans to construct Morgan Park Phase 2 east of the Project area (south of Morgan Street and Morgan Park Phase 1), which will include a lighted soccer field and surface parking. Construction of Morgan Park Phase 2 is planned to be initiated in April 2020 (City of Perris, 2019). The Project does not propose the development of any type of residential land use or other use that would result in a direct increase in the City's population. However, as required by the City of Perris, the Project Applicant would be required to pay applicable Development Impact Fees, including fees for parks. The Project would not require the construction of new or expanded park facilities; therefore, no physical impacts would result and the impact would be less than significant.
- **Other Public Facilities.** Residents of the City of Perris are provided library services through the Riverside County Library System (RCLS). As identified in the PVCCSP EIR IS, development of allowed uses under the PVCCSP, including Light Industrial uses proposed as part of the Project, would not directly increase the demand for library or other public services as no new residential uses would be developed and there would be no direct increase in population. However, as required by the City of Perris, the Project Applicant would be required to pay applicable Development Impact Fees, including fees for community amenities and government facilities. The Project would not require the construction of new or expanded library facilities; therefore, no physical impacts would result and the impact would be less than significant.

Consistent with existing conditions, operation and maintenance of the PVSD Channel would be the responsibility of the Riverside County Flood Control and Water Conservation District (RFCF&WCD). The Project implements a regional drainage improvement that is anticipated in PVCCSP and PVCCSP EIR. The physical impacts associated with construction and operation of the PVSD Channel improvements are addressed throughout the analysis presented in this EIR. No additional impacts would result.

6.1.4 RECREATION

As identified above, the City's Community Services Department is responsible for recreational facilities in the City. The Project would not include a residential use or other use that would directly increase the City's population and the demand for recreational facilities. As identified in the PVCCSP EIR IS, the City requires that large projects provide an on-site recreational amenity. As required by Section 8.2 of the PVCCSP, the Project would provide employee amenities. Additionally, as described in Section 3.0,

Project Description, of this EIR, the Project involves implementation of a linear trail that abuts the northern boundary of the segment of the MWD trail that extends between the Rider 2 and Rider 4 building sites, and would replace the regional trail along the PVSD Channel that would be removed to implement the channel improvements. The proposed linear trail would meet the intent of the MWD trail on MWD's property as anticipated in the PVCCSP. Therefore, the Project would not result in or accelerate the physical deterioration of existing neighborhood or regional parks or recreational facilities. Further, the physical impacts associated with construction and operation of the on-site amenities and recreational features are addressed throughout the analysis presented in this EIR. Additionally, as required by the City of Perris, the Project Applicant would be required to pay applicable Development Impact Fees, including fees for parks. No additional impacts would result.

6.1.5 WILDFIRE

According to Exhibit S-16, Wildfire Constraint Areas, of the City General Plan Safety Element, the Project area is not located in or near an area identified as being a "Wildfire Hazard Area" (City of Perris, 2016). Additionally, according to the California Department of Forestry and Fire Protection's (CalFire) Fire and Resources Assessment Program (FRAP), the Project area is not located in a Very High Fire Hazard Severity Zone (VHFHSZ) of the City (CAL FIRE, 2009). The Project area is located within the limits of the City of Perris, and is therefore not within a State Responsibility Area (SRA), which is the land where the State of California is financially responsible for the prevention and suppression of wildfires. Further, as previously identified, the NOP for this EIR was sent to CalFire and they did not have comments on the scope of the EIR. Therefore, the Project would have no impacts related to wildfires.

6.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The environmental impacts of the Project are discussed in Sections 4.1 through 4.15 of this EIR, as applicable. With incorporation of applicable PVCCSP EIR mitigation measures and Project-specific mitigation measures, impacts related to the following topical issues would be less than significant: Aesthetics, Agriculture and Forestry Resources, Biological Resources, Cultural Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Transportation, Tribal Cultural Resources, and Utilities and Services Systems.

Even with incorporation of the applicable PVCCSP EIR mitigation measures, the Project would result in the following significant and unavoidable impacts. No mitigation measures are feasible to reduce these potentially significant project and cumulative impacts to a less than significant level. Therefore, adoption of a Statement of Overriding Considerations is required.

- **Cumulative Considerable Increase in Criteria Pollutant During Construction and Operation.** Maximum daily emissions from Project construction and operations would exceed the South Coast Air Quality Management District (SCAQMD) CEQA significance thresholds for nitrogen oxides (NOx) and cannot be effectively reduced to a level below SCAQMD thresholds. The NOx exceedance during construction is primarily due to the overlap in construction activities with the majority of emissions occurring during the Rider 2 and 4 Warehouse Construction – Building Construction phase (due to vendor trips accessing the Project area). With respect to operations, the magnitude of NOx reductions from identified mitigation measures would be

relatively small because over 95 percent of operational-source NOx emissions would be generated from the mobile activities. Because NOx is an ozone (O₃) precursor, this could also result in additional violations of the State and federal O₃ standards. O₃ is a nonattainment pollutant. There are no additional feasible mitigation measures beyond those identified in Section 4.3, Air Quality, of this EIR, that would reduce the project's NOx emissions to a less than significant level. Therefore, the Project's construction and operational air quality impacts are significant and unavoidable relative to NOx emissions, and the Project would result in a cumulatively considerable net increase in a criteria pollutant for which the Project region is in non-attainment, which is a significant and unavoidable impact.

- **Cumulative Greenhouse Gas Emissions.** The Project's GHG emissions would exceed the SCAQMD's recommended 10,000 million tons of carbon dioxide equivalent per year (MTCO₂e/yr) screening threshold for industrial projects. There are no additional feasible mitigation measures beyond those identified that would reduce the project's GHG emissions to a less than significant level. Therefore, this impact would be cumulatively considerable and significant and unavoidable.
- **Off-site Traffic Noise Impacts (Project and Cumulative).** Off-site Project-generated traffic noise would exceed the established threshold of significance along one roadway segment adjacent to sensitive noise receivers with trucks using only the Harley Knox Boulevard/I-215 interchange under Existing Plus Project and Cumulative traffic conditions. With truck use of only the Placentia Avenue/I-215 interchange off-site Project-generated traffic noise would be significant along one roadway segment adjacent to sensitive noise receivers under Existing Plus Project conditions, and two roadway segments under Cumulative conditions. There is no feasible mitigation for these impacts resulting in significant and unavoidable Project and Cumulative off-site traffic noise impacts.

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

Section 15126.2(d) of the State CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by a proposed project. Specifically, Section 15126.2(d) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses.
- The project would involve a large commitment of nonrenewable resources.

- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project.
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Determining whether the proposed project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. The Project area has historically been used for agricultural purposes and contains a portion of the existing PVSD Channel. However, the City's General Plan and the PVCCSP anticipate that the proposed building sites will eventually support uses that would generate jobs and revenue while expanding the availability of goods and services. Additionally, the Project would permanently alter the site by converting the undeveloped property to urban uses. This is a significant irreversible environmental change that would occur because of Project implementation. Because no significant mineral resources were identified within the Project limits, no significant impacts related to these issues would result from development of the proposed expansion site.

Construction and long-term operation of the Project would require the commitment and reduction of nonrenewable and/or slowly renewable resources, including petroleum fuels and natural gas (for vehicle emissions, construction, lighting, heating, and cooling of structures) as well as lumber, sand/gravel, steel, copper, lead, and other metals (for use in building construction, piping, and roadway infrastructure). Other resources that are slow to renew and/or recover from environmental stressors would also be impacted by Project implementation, such as air quality (through the combustion of fossil fuels and production of greenhouse gases) and water supply (through the increased demands for potable water for drinking, cleaning, landscaping, and general maintenance needs). However, their use is not expected to negatively impact the availability of these resources, as the Project remains consistent with the current land use and zoning designation under the PVCCSP, which indicates that the City anticipates growth.

An increased commitment of public services (e.g., police, fire, sewer, and water services) would also be required. Project development is an irreversible commitment of the land, energy resources, and public services. After the 50- to 75-year structural lifespan of the building is reached, it is improbable that the site would revert to its current use due to the large capital investment that will already have been committed.

6.4 GROWTH INDUCING IMPACTS

CEQA requires a discussion of ways in which the proposed project could be growth inducing. The State CEQA Guidelines identify a project as growth inducing if it fosters economic or population growth or if it encourages the construction of additional housing either directly or indirectly in the surrounding environment (State CEQA Guidelines, Section 15126.2[e]). New employees from commercial or industrial development and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

To address this issue, potential growth-inducing effects are examined through analysis of the following questions:

1. Would this project remove obstacles to growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area or through changes in existing regulations pertaining to land development)?
2. Would this project result in the need to expand one or more public services to maintain desired levels of service?
3. Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
4. Would approval of this project involve some precedent setting action that could encourage and facilitate other activities that could significantly affect the environment?

A project could indirectly induce growth by reducing or removing barriers to growth, or by creating a condition that attracts additional population or new economic activity. However, a project's potential to induce growth does not automatically result in growth. Growth can only happen through capital investment in new economic opportunities by the private or public sectors. Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of little significance to the environment. This issue is presented to provide additional information on ways in which the Project could contribute to significant changes in the environment, beyond the direct consequences of implementing the Project examined in the preceding sections of this EIR.

- 1. Would this project remove obstacles to growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development)?** As identified in Section 5.0, Other CEQA Topics, of the PVCCSP EIR, the City of Perris General Plan EIR concludes that new development consistent with the Perris General Plan would require extension and upgrading of major infrastructure (e.g., sewer and water facilities, storm drains, roadways, and dry utilities), and indirect extension of infrastructure represents a significant impact. The Project implements the PVCCSP and would not involve the construction of any major roadways or infrastructure that are not already planned in the City General Plan or PVCCSP to accommodate anticipated growth. This includes the implementation of the regional PVSD Channel improvements that would occur with Project. Further, existing utility infrastructure and facilities are available adjacent to or in proximity to the site. New utility infrastructure would be required to serve the proposed development and connect to existing utilities. The utility infrastructure would be sized and located expressly to serve the proposed development and would not therefore induce growth in the Project vicinity.

The Project implements the approved PVCCSP and planned regional drainage improvements. No Specific Plan amendment, General Plan amendment, or zone change is proposed. Therefore, the Project would not change existing regulations pertaining to land development. The Project is therefore not considered to be growth inducing with respect to removal of obstacles to growth.

- 2. Would this project result in the need to expand one or more public services to maintain desired levels of service?** The Project would not necessitate the expansion of existing public service facilities to maintain desired levels of service. If these facilities or associated resources do need to be expanded, funding mechanisms are in place through existing regulations and

standard practices to accommodate such growth. This Project would not, therefore, have significant growth inducing consequences with respect to public services.

- 3. Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?** A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with the increase in project population and thus reducing or removing the barriers to growth. This occurs in suburban or rural areas where population growth results in increased demand for service and commodity markets responding to the new population. This type of growth is, however, a regional phenomenon resulting from introduction of a major employment center or regionally significant housing project. Additional commercial uses may be drawn to the area by the increased number of residents in the area because of a project. However, it is expected that any such development would occur consistent with planned growth identified in the City's General Plan.

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 a project. The Project consists of the construction and operation of two warehouse buildings totaling approximately 1,352,736 sf and the expansion of the existing PVSD Channel. During Project construction, design, engineering, and construction-related jobs would be created. This would last until Project construction is completed. 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. As this relates to industrial uses, 1 employee per 1,030 square feet is estimated for Light Industrial floor space. Assuming the employment generation for the proposed would be consistent with Table 4.8-E of the PVCCSP EIR, the Project would generate approximately 1,313 new employees. The PVCCSP EIR estimates that implementation of the land uses allowed under the PVCCSP would result in the generation of approximately 56,087 jobs/employees in the area. Therefore, the employment generation estimated for the Project represents approximately 2.3 percent of the total employment generation anticipated in the Specific Plan area. Additionally, it is anticipated that these new warehouse/distribution positions would be filled by workers who would already reside in the region. Consistent with the conclusions of the PVCCSP EIR, operation of the Project would not generate a permanent increase in population within the City and would not increase the demand for additional goods and services.

- 4. Would approval of this project involve some precedent setting action that could encourage and facilitate other activities that could significantly affect the environment?** As identified above, the Project would implement the PVCCSP and would not involve a General Plan amendment or zone change. Additionally, no changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, fire codes) are proposed or required to implement this Project. The PVCCSP EIR mitigation measures have been identified in Sections 4.1 through 4.15 of this EIR to ensure that implementation of the Project complies with all applicable City plans, policies, and ordinances to ensure that no conflicts with adopted land development regulations occur and that environmental impacts are minimized. The Project does not propose any precedent-setting actions that, if approved, would specifically allow, or encourage other projects and resultant growth to occur.

6.5 REFERENCES

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7.0 LIST OF EIR PREPARERS

7.1 LEAD AGENCY

CITY OF PERRIS

Kenneth Phung	Planning Manager
Mary Blais	Contract Planner
Cathy Perring	Contract Planner
Michael Brown, Cadence Environmental Consultants	City EIR Consultant

7.2 CONSULTANTS INVOLVED IN THE PREPARATION OF THE EIR

The following individuals were involved in the preparation of the EIR and/or technical reports in support of the EIR.

**T&B PLANNING, INC.
(EIR Preparation)**

Christina Andersen	Principal-in-Charge/Project Manager
Jerrica Harding	Senior Associate
Emilie Colwell	Environmental Analyst
Christhida Mroska	Environmental Analyst
Lauren Fujimori	Environmental Analyst
Cristina Maxey	Graphics

**URBAN CROSSROADS
(Air Quality, Energy, Greenhouse Gas, Noise, and Traffic Analysis)**

Aric Evatt	President
Bill Lawson, P.E., INCE	Principal/Noise
Haseeb Qureshi	Associate Principal
Connor Paquin	Transportation Engineer
Charlene So, P.E.	Associate Principal
Alyssa Tamase	Analyst

**GLENN LUKOS ASSOCIATES, INC.
(Biological Technical Report)**

Martin Rasnick	Principal/Director Regulatory Specialist
Lesley Lokovic Gamber	Regulatory Specialist
Trina Ming	Restoration Specialist
April Nakagawa	Biologist
David Smith	Biologist
Jillian Stephens	Biologist

BRIAN F. SMITH AND ASSOCIATES, INC.
(Phase I Cultural Resources Survey and Paleontological Assessment)

Brian F. Smith, M.A. Principal Investigator
Andrew J. Garrison, M.A., RPA Senior Project Archaeologist
Todd Wirths, M.S., P.G. Senior Paleontologist

SOUTHERN CALIFORNIA GEOTECHNICAL
(Geotechnical Investigation and Infiltration Test)

Gregory K. Mitchell, GE Principal Engineer
Robert G. Trazo, GE Principal Engineer
Scott McCann Staff Scientist

HAZARD MANAGEMENT CONSULTING
(Phase I Environmental Site Assessment and Pesticide Soil Testing)

Mark Cousineau, NREP Principal
Paul Roberts, P.G. Principal Geologist

ALBERT A. WEBB ASSOCIATES
(Drainage Report and Water Quality Management Plan)

DJ Arellano, P.E. Senior Engineer