

**STATEMENT OF FACTS AND FINDINGS  
AND  
STATEMENT OF OVERRIDING CONSIDERATIONS  
REGARDING THE ENVIRONMENTAL EFFECTS FOR THE  
IDI RIDER 2 & 4 HIGH CUBE WAREHOUSES AND  
PVSD CHANNEL IMPROVEMENT PROJECT**

**June 2021**

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## **SECTION 1.0 STATEMENT OF FACTS AND FINDINGS**

### **1.1 INTRODUCTION**

The California Environmental Quality Act (“CEQA”) (Pub. Resources Code, Sections 21000-21178) and the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines) (Cal. Code Regs., tit. 14, Sections 15000-15387) require that the lead agency for a project analyze and provide findings on the project’s environmental impacts before approving the project. The City of Perris (the “City”), in its capacity as the CEQA Lead Agency, has prepared these Findings of Fact (“Findings”) to comply with CEQA for the IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain (PVSD) Channel Improvement Project (the “Project”). The Project is within the City’s jurisdiction. Specifically, regarding Findings, State CEQA Guidelines Section 15091 establishes the following requirements:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
  - 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
  - 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
  - 3. Specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.
- (b) The findings required by subdivision (a) shall be supported by substantial evidence in the record.
- (c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subdivision (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.
- (d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.
- (e) The public agency shall specify the location and custodian of the documents or other materials which constitute the record of the proceedings upon which its decision is based.

- (f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

Section 15093 of the State CEQA Guidelines further provides:

- (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”
- (b) Where the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. This statement of overriding considerations shall be supported by substantial evidence in the record.
- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

Where a project will cause unavoidable significant environmental impacts, the Lead Agency may still approve a project where its benefits outweigh the adverse impacts. Further, as provided in the Statement of Overriding Considerations, the Lead Agency sets forth specific reasoning by which benefits are balanced against effects, and approves the project.

The City of Perris (City), the CEQA Lead Agency, finds and declares that the *IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project Environmental Impact Report* (EIR, State Clearinghouse [SCH] No. 2019100297) has been completed in compliance with CEQA and the State CEQA Guidelines. The City finds and certifies that the EIR was reviewed and that information contained in the EIR was considered prior to approving the Project.

Having received, reviewed and considered the Draft Environmental Impact Report (Draft EIR) and the Final Environmental Impact Report (Final EIR) for the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project (collectively, “the EIR”), as well as all other information in the record of proceedings on this matter, the Findings and Facts in Support of Findings (Findings) and Statement of Overriding Considerations (SOC) included in this document are hereby adopted by the City of Perris (City) in its capacity as the CEQA Lead Agency.

Based upon its review of the EIR, the Lead Agency finds that the Final EIR is an adequate assessment of the potentially significant environmental impacts of the Project, represents the independent judgment of the City, and sets forth an adequate range of alternatives to this project.

## **1.2 RECORD OF PROCEEDING**

For purposes of CEQA and these Findings, the Record of Proceedings for the Project consists of the following documents and other evidence:

- a) The Notice of Preparation and all other public notices issued by the City in conjunction with the proposed Project (as defined below);
- b) The Draft EIR, all appendices, and technical reports, thereto;
- c) The certified Final EIR State Clearinghouse No. 2019100297;
- d) Comments and Responses to Comments on the Draft EIR received during the public review comment period, including a list of all persons, organizations, and public agencies commenting;
- e) All written and verbal public testimony presented during noticed public hearings for the proposed Project at which such testimony was taken;
- f) Information provided in submissions of testimony from officials and Departments of the City, the public and other municipalities, and agencies;
- g) The Mitigation Monitoring and Reporting Program (MMRP);
- h) Transmittal packages to the Perris Planning Commission for review and minutes of the Perris Planning Commission hearing(s);
- i) The Ordinances and Resolutions adopted by the City in connection with the Project, and all documents incorporated therein;
- j) Matters of common knowledge to the City, including but not limited to federal, state, and local laws and regulations;
- k) Any documents expressly cited in these Findings; and
- l) Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(c).

### **1.3 CUSTODIAN AND LOCATION OF RECORDS**

The documents and other materials that constitute the administrative record for the City's approval of the Final EIR and actions related to the Project are located at the City of Perris Development Services Department, 135 North "D" Street, Perris, California 92570. The City of Perris is the custodian of the Project's Administrative Record. Copies of the documents and other materials that constitute the record of proceedings are, at all relevant times have been, and will be available upon request directed to the City's Planning Division. These Findings provide this information in compliance with Section 21081.6(a)(2) of the *California Public Resources Code* and Section 15091(e) of the State CEQA Guidelines.

## **SECTION 2.0 PROJECT SUMMARY**

### **2.1 INTRODUCTION**

The proposed IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project is intended to implement the land use and related plans adopted by the City Council in January 2012 with the Perris Valley Commerce Center Specific Plan (PVCCSP) (Ordinance No. 1284). The PVCCSP is a comprehensive planning effort undertaken by the City to redesignate a large portion of the northern part of the City with job-creating land uses. The City has long suffered from a poor jobs-housing balance (meaning most City residents commute to Los Angeles or Orange Counties for employment) and one of the goals of the PVCCSP is to implement job-creating land uses to help alleviate the jobs-housing imbalance in the City. To this end, the PVCCSP designates a large portion of the City with broad categories of compatible commercial and industrial uses. The Project area is within the PVCCSP planning area, and the PVCCSP land use designation applicable to the Project area envisions that the Project area will be utilized for light industrial uses and the future PVSD channel. Thus, one of the Project's primary purposes is to implement the previous policy decision made by the City Council and to implement the PVCCSP for the Project area. The Project is consistent with the land use and growth assumptions anticipated in the PVCCSP for the Project area.

The environmental impacts resulting from implementation of allowed development under the PVCCSP, including the Project, have been evaluated in the *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report* (PVCCSP EIR, 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 subsequent project to permit discussion solely of new effects which had not been considered before". As such, the environmental analysis for the Project presented in the 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 2.5 of this document).

A Notice of Preparation (NOP) was prepared for the Project (1) to identify environmental issues/impacts that would have no impact and would require no further evaluation in the Project-level EIR, and (2) to identify those issues requiring additional Project-level impact analysis. The NOP is included in Appendix A of the Draft EIR. The environmental analysis conclusions of the NOP and Draft EIR for the Project are addressed in these Findings.

### **2.2 DESCRIPTION OF PROJECT PROPOSED FOR APPROVAL AND SETTING**

#### **2.2.1 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.

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 or Metropolitan) 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.

## **2.2.2 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 a trail and greenbelt within 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, approximately 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.

### **2.3 PROJECT OBJECTIVES**

The following objectives have been established for 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 Southern California Association of Governments (SCAG) region in achieving jobs/housing balance region-wide by providing additional job opportunities in a housing rich area of the Inland Empire.

## **2.4 REQUIRED DISCRETIONARY ACTIONS AND PERMITS**

The following discretionary actions are anticipated to be taken by the City of Perris as part of the Project:

- Certification of EIR with the determination that the EIR has been prepared in compliance with the requirements of CEQA (Case No. 19-05180).
- Approval of Development Plan Reviews (DPR) (Case Nos. 19-00004 and 19-00006) for the Rider 2 and Rider 4 site plans and building elevations, respectively.
- Approval of Tentative Parcel Map (TPM) No. 37437 (Case No. 19-05058) 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).
- Approval of 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 three unimproved streets (Kitching Street, Sinclair Street, and Adams Street).

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

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

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

- **United States Army Corps of Engineers (ACOE).** Issuance of a 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 a Conditional Letter of Map Revision (CLOMR) and Final Letter of Map Revision (LOMR).

- **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 Control Board (RWQCB).** Issuance of: a Construction Activity General Construction Permit; National Pollutant Discharge Elimination System (NPDES) permit; and 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 (Metropolitan).** Review and approval of a lease agreement and/or any encroachment within Metropolitan's property for implementation of any Project features, including the PVSD Channel improvements.
- **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 heating, ventilation, and air conditioning (HVAC) units.
- **Other Utility Agencies.** Issuance of permits and associated approvals, as necessary for the installation of new utility infrastructure or connections to existing facilities.

## 2.5 OTHER CEQA DOCUMENTS REFERENCED

Under Section 15150 of the State CEQA Guidelines, an EIR may incorporate by reference all or portions of another document that are a matter of public record or are generally available to the public. The previously prepared EIRs and environmental analyses listed below were relied upon or consulted in the preparation of the Project's EIR and were incorporated by reference:

- *Perris Comprehensive General Plan 2030*, 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.
- *Perris Valley Commerce Center Final Environmental Impact Report* (SCH No. 2009081086), certified January 10, 2012.

### **SECTION 3.0 ENVIRONMENTAL REVIEW / PUBLIC PARTICIPATION**

The City of Perris conducted an extensive review of this Project, which included a Draft EIR, a Final EIR, and technical reports, along with a public review and comment period. The following is a summary of the City's environmental review of this Project:

- Pursuant to the provision of Section 15082 of the State CEQA Guidelines, as amended, the City of Perris circulated a Notice of Preparation (NOP) to the State Clearinghouse, responsible agencies, and other interested parties for a 30-day period. The 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. The City also directly distributed the NOP to 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.
- A scoping meeting was held before the City of Perris Planning Commission on November 6, 2019, pursuant to the requirements of Section 15082(c)(1) of the State CEQA Guidelines.
- The City of Perris circulated the Draft EIR for the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project from September 30, 2020, to November 16, 2020. A notice advising of the availability of the Draft EIR was posted by the Riverside County Clerk on September 30, 2020. The Notice of Availability (NOA) of the Draft EIR and a USB device with the Draft EIR and technical appendices was circulated to the State Clearinghouse (SCH), responsible agencies, and other interested agencies and parties on or about September 30, 2020.
- The NOA was also sent to adjacent property owners within 300-feet of the Project area, and was posted in the Perris Progress (the newspaper of general circulation in the area affected by the Project) on September 30, 2020.
- The NOA, Draft EIR, and associated technical studies were made available to the public on the City's website.
- A Notice of Completion (NOC) was also transmitted to the SCH on September 30, 2020.
- The City received a total of seven comment letters from various agencies and other interested parties. The City prepared responses to all written comments. The comments and responses are contained in Section 2.2 of the Final EIR.
- In accordance with the provisions of Section 21092.5 of the *California Public Resources Code*, the City of Perris has provided a written proposed response to each commenting public agency no less than ten days prior to the proposed certification date of the Final EIR.
- The City published a notice on June 2, 2021, in the Perris Progress that the Planning Commission would hold a public hearing on June 16, 2021, to consider recommending approval of the Project and certification of the Final EIR.
- The City mailed notice of the Planning Commission hearing to all property owners within a 300-foot radius of the Project area on May 28, 2021.
- The City sent notice of the Planning Commission's hearing to all organizations and individuals who had previously requested notification of anything having to do with the Project on May 28, 2021.

- The City held a public hearing of the Planning Commission on June 16, 2021, and, after full consideration of all comments, written and oral, recommended certification of the Final EIR, prepared in compliance with CEQA, and recommended approval of the Project.

## **SECTION 4.0 INDEPENDENT JUDGMENT AND FINDING**

The Project Applicant retained the independent consulting firm of T&B Planning, Inc. (T&B Planning) to prepare the EIR for the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project. T&B Planning prepared the EIR under the supervision, direction, and review of the City with the assistance of an independent peer review consultant hired by the City (Cadence Environmental Consultants). The City of Perris is the Lead Agency for the preparation of the EIR, as defined by CEQA (*California Public Resources Code*, Section 21067 as amended). The City has received and reviewed the EIR prior to its certification and prior to making any decision to approve or disapprove the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project. All findings set forth herein are based on substantial evidence in the record as indicated with respect to each specific finding.

### **FINDING**

The EIR for the Project reflects the independent judgment of the City of Perris. The City has exercised independent judgment in accordance with Section 21082.1(c)(3) of the *California Public Resources Code* in retaining its own environmental consultant to review the EIR, and directing the consultant in the preparation of the EIR. The City has independently reviewed and analyzed the EIR and accompanying studies and finds that the report reflects the City's independent judgment.

The City has considered all the evidence presented in its consideration of the Project and the EIR, including, but not limited to, the Final EIR and its supporting studies; written and oral evidence presented at hearings on the Project; and written evidence submitted to the City by individuals, organizations, regulatory agencies, and other entities. On the basis of such evidence, the City finds that, with respect to each environmental impact identified in the review process, the impact (1) is less than significant and would not require mitigation; or (2) is potentially significant but would be avoided or reduced to a less than significant level by implementation of identified mitigation measures; or (3) would be significant and not able to be fully mitigated but would be, to the extent feasible, lessened by implementation of identified mitigation measures. The EIR also identifies certain significant adverse environmental effects of the Project which cannot be avoided or substantially lessened. Prior to approving this Project, the City will also adopt a Statement of Overriding Considerations which finds, based on specific reasons and substantial evidence in the record (as specified in Section 7.0), that certain identified economic, social, or other benefits of the Project outweigh such unavoidable adverse environmental effects.

## **SECTION 5.0 ENVIRONMENTAL IMPACTS AND FINDINGS**

### **5.1 EFFECTS DETERMINED NOT TO BE SIGNIFICANT**

Through the preparation of the NOP included in Appendix A of the Draft EIR, and analysis conducted during preparation of the Draft EIR, it was concluded that the Project would have no impact or result in a less than significant impact for a number of environmental topic areas, as identified below. Although impacts determined not to be significant do not themselves require mitigation, in some cases mitigation measures have been identified to further reduce less than significant impacts. In these cases, the mitigation measures are noted, although the impacts would be less than significant even without such measures. Additionally, impacts that are less than significant with adherence to regulatory requirements (RRs) are identified.

- Aesthetics (scenic vistas, scenic resources within a State scenic highway, and substantially degrade the existing visual character of public views, light and glare during operation, and associated cumulative impacts).
- Agriculture and Forestry Resources (convert Farmland to non-agricultural use, conflict with agricultural zoning or a Williamson Act contract, conflict with zoning for or cause forest land or timberland to be rezoned, loss of forest lands or conversion to non-forest use, other changes that involve conversion of Farmland or forest land, and associated cumulative impacts).
- Air Quality (Air Quality Management Plan consistency, exposure of sensitive receptors to substantial pollutant concentrations during operations, and other emissions/odors, and associated cumulative impacts).
- Biological Resources (wildlife movement, conflict with local policies and ordinance protecting biological resources, and associated cumulative impacts).
- Cultural Resources (historic resources and associated cumulative impacts).
- Energy (energy consumption, conflict with plans for renewable energy or energy efficiency, and associated cumulative impacts).
- Geology and Soils (rupture of a known earthquake fault, direct or indirect effects due to strong seismic ground shaking, landslides, soil erosion or loss of topsoil, soils incapable of supporting septic tanks, and associated cumulative impacts).
- Greenhouse Gas (GHG) Emissions (conflict with an applicable plan, policy, or regulation for reducing GHG emissions; and associated cumulative impacts)
- Hazards and Hazardous Materials (significant hazard to the public or environment through the transport, use, or disposal of hazardous materials; hazardous material substances or waste near a school; located on a list of hazardous materials sites; interfere with an emergency response plan; wildland fires; and associated cumulative impacts).
- Hydrology and Water Quality (violate water quality standards or degrade surface or groundwater quality; decrease groundwater supplies; alter the existing drainage pattern resulting in erosion, flooding, or exceedance of the capacity of storm water drainage systems; conflict or obstruct the implementation of a water quality or groundwater plan; and associated cumulative impacts).
- Land Use and Planning (physically divide an established community; conflict with any land use plans, policies, or regulations; and associated cumulative impacts).



- Mineral Resources (loss of availability of a known, valuable mineral resource or locally important mineral resource recovery site, and associated cumulative impacts).
- Noise (substantial permanent increase in ambient noise levels from on-site operations, excessive groundborne vibration or groundborne noise levels, and associated cumulative impacts).
- Population and Housing (induce substantial population growth, displace substantial numbers of existing housing or people, and associated cumulative impacts).
- Public Services (fire protection, police protection, schools, parks, other public facilities, and associated cumulative impacts).
- Recreation (increased use of existing recreational facilities, construction or expansion of recreational facilities, and associated cumulative impacts).
- Transportation (conflict with CEQA Guidelines Section 15064.3 subdivision b and associated cumulative impacts).
- Tribal Cultural Resources (change in the significance of a listed or eligible for listing tribal cultural resources, and associated cumulative impacts).
- Utilities and Service Systems (new or expanded utility facilities, sufficient water supplies exceed the capacity of wastewater treatment facilities, generate solid waste in excess of capacity of infrastructure, comply with solid waste regulations, and associated cumulative impacts).
- Wildfire (location in a State Responsibility Area or very high fire hazard severity zone, and associated cumulative impacts)

### **Findings:**

**The City finds that, based on substantial evidence in the record, the following impacts, to the extent they result from the Project, will be less than significant.**

#### **5.1.1 AESTHETICS**

**Scenic Vistas.** As discussed in Section 4.1, Aesthetics, of the Draft EIR, scenic vistas are the view of an area that is visually or aesthetically pleasing. The City identifies views of Lake Perris Dam, the Bernasconi Hills, the Gavilan Hills, Motte-Rimrock Reserve, and the March Air Reserve Base as scenic vistas. The Project area is not within a scenic vista and development of the Project area would not adversely affect a scenic vista because of the relatively flat nature of the Project area and orientation of the proposed buildings. Additionally, the Project would be developed in compliance with the Standards and Guidelines identified in the PVCCSP to address visual character. 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 Metropolitan property, 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 Metropolitan property 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.

**Damage Scenic Resources within a State Scenic Highway.** As discussed in Section 4.1, Aesthetics, of the Draft EIR, no specific scenic resources such as trees, rock outcroppings or unique features exist within the PVCCSP area, including the Project area. The Project area is not located along a state scenic highway. The nearest “Officially Designated” State Scenic highway is State Route (SR) 243, located approximately 20 miles east of the Project area. As such, development of the Project would not affect views from a state scenic highway.

**Substantially Degrade the Existing Visual Character of the Site.** As discussed in Section 4.1, Aesthetics, of the Draft EIR, 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. 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 in an attractive, well-designed manner using architectural elements, landscaping, and project design. The architectural Standards and Guidelines outlined in the PVCCSP have been developed to ensure aesthetic cohesiveness and superior architectural design and to improve the visual character in the PVCCSP area. 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.

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 CRA; within the Metropolitan property) and associated Metropolitan manholes using engineered drop structure. 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.

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.

**Light and Glare During Operation.** As discussed in Section 4.1, Aesthetics, of the Draft EIR, development of the Project 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. It is anticipated that lighting would be similar to that used in nearby warehouse uses. All lighting would be subject to lighting requirements contained in the PVCCSP, the County of Riverside Ordinance No. 655, and City of Perris Municipal Code Section 19.02.110. Adherence to these regulations would ensure that any building or parking lighting would not significantly affect adjacent uses. Therefore, operational impacts related to lighting would be less than significant and no mitigation is required.

Building materials would be subject to the PVCCSP Standards and Guidelines related to exterior color and materials and would not include reflective surfaces that result in substantial glare. Proposed exterior surfaces of the structures would be finished with a combination of painted concrete tilt-up panels and low-reflective materials, including low-reflective glass. The project would comply with the requirements of the PVCCSP related to building materials to ensure that glare would not create a nuisance to on- and off-site viewers of the project site. The potential impact would be less than significant and no mitigation is required.

Refer to Section 5.2.6, which addresses lighting hazards associated with the MARB/IP Airport.

**Cumulative Impacts.** As discussed in Section 4.1, Aesthetics, of the Draft EIR, development within the City of Perris and specifically the PVCCSP area, would 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 the PVCCSP. Cumulative projects in the same viewshed as the Project would be required to comply with all standards and guidelines set forth in the PVCCSP regarding architectural design, landscaping, and others, it is expected that these projects would also conform to the overall visual theme of the area. Cumulative impacts related to the change in visual character would be less than significant. Cumulatively, more lighting would be introduced into the area by proposed, existing, and future development. As with past and currently proposed development, cumulative lighting-related impacts would be reduced through the adherence to applicable City and County lighting standards, and requirements outlined in the PVCCSP.

### 5.1.2 AGRICULTURE AND FORESTRY RESOURCES

**Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.** As discussed in Section 4.2, Agriculture and Forestry Resources, of the Draft EIR, 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." Under existing conditions, the Project area is not utilized for agricultural purposes. To quantify a development project's potential impacts on agricultural resources, the California Department of Conservation has developed the Land Evaluation and Site Assessment Model (LESA), a method of rating the relative quality of land resources and potential impacts to agricultural resources. The Project area received a Land Evaluation (LE) subscore of 18.52 and a Site Assessment (SA) subscore of 26.06, which sums to a final LESAs score of 44.58. Pursuant to the LESAs Model scoring system, a final LESAs 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 LE factor score is less than 20, the Project's conversion of Farmland to a non-agricultural use would be less than significant.

**Conflict with an Agricultural Zoning or a Williamson Act Contract.** As discussed in Section 4.2, Agriculture and Forestry Resources, of the Draft EIR, the City's General Plan does not identify agricultural zones on the Project area or any of the surrounding properties. The Project area's underlying zoning designation was amended to "Specific Plan" with an underlying Specific Plan land use designation of "Light Industrial" and "Public/Semi Public Facility." Land use designations envisioned under the PVCCSP do not include any agricultural land uses. The Project area is not covered under a Williamson Act Contract; therefore, the Project would not conflict with any Williamson Act Contract.

**Conflict with Zoning for or Cause Forest Land or Timberland to Be Rezoned. Result in Loss or Conversion of Forest Land to Non-Forest Use.** As discussed in Section 4.2, Agriculture and Forestry Resources, of the Draft EIR, according to the PVCCSP, there are no areas within the PVCCSP, including the Project area, that are designated for forest land. The Project would not conflict with existing forest zoning for or cause rezoning of forest land or timberland to other uses. Further, the Project area does not contain forest land or any vegetation communities associated with forest land. 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.

**Involve Other Changes that Could Result in the Conversion of Farmland to Non-Agricultural Use or Conversion of Forest Land to Non-Forest Use.** As discussed in Section 4.2, Agriculture and Forestry Resources, of the Draft EIR, there are no agricultural activities occurring in the area surrounding the Project area and site adjacent areas designated Farmland (Farmland of Statewide Importance) include existing roadways or the Metropolitan property that is not used for agricultural purposes. Based on the results of the LESA, which takes into consideration Farmland in the zone of influence, 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).

**Cumulative Impacts.** As discussed in Section 4.2, Agriculture and Forestry Resources, of the Draft 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 conversion of agricultural uses and Farmland to a more urbanized, non-agricultural land use is a continuing development trend occurring in the region. 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, except for 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 PVCCSP would result in the continued conversion of Farmland to non-agricultural uses. 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 agricultural and forest land would not occur and the Project has no potential to result in a cumulatively considerable impact to the loss of these lands.

### 5.1.3 AIR QUALITY

**Air Quality Management Plan (AQMP) Consistency.** As discussed in Section 4.3, Air Quality, of the Draft EIR, 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 warehouse buildings 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.

**Exposure of Sensitive Receptors to Substantial Pollutant Concentrations During Operation.** As discussed in Section 4.3, Air Quality, of the Draft EIR, Project operational-source emissions would not exceed applicable SCAQMD localized significance thresholds (LST) for the nearest sensitive receptor. Therefore, the Project would have a less than significant localized impact during long-term operational activities.

Long-term operational emissions would result from the operation of diesel-powered trucks delivering and removing supplies and materials to and from the Project area. In compliance with PVCCSP EIR mitigation measure MM Air 15, a Health Risk Assessment (HRA) was prepared for the Project. Based on the operational assumptions presented in the Draft EIR, and assuming truck use of the existing Harley Knox Boulevard interchange with I-215, at the nearest residential sensitive receptors (existing non-conforming residence within a light industrial-designated land use), which is the Maximally Exposed Individual Receptor (MEIR), the maximum incremental cancer risk attributable to Project diesel particulate matter (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.

The worker receptor land use with the greatest potential exposure to Project DPM source emissions is located 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.

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.

A HRA was also conducted for mobile source emissions assuming truck use of the Placentia Avenue/I-215 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. 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.

For operational emissions, vehicle exhaust is the primary source of carbon monoxide (CO) and the highest CO concentrations would be found close to congested intersections and roadway segments. 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 Bay Area Air Quality Management District 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.

Therefore, less than significant impacts to sensitive receptors during operation would occur and no mitigation is required.

**Other Emissions (Such as Those Leading to Odors).** As discussed in Section 4.3, Air Quality, of the Draft EIR, 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. The Project does not propose or require any additional land uses typically associated with emitting objectionable odors. 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.

**Cumulative Impacts.** As discussed in Section 4.3, Air Quality, of the Draft EIR, 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.

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

With respect to cumulative TAC emissions, there are no state or federal ambient air quality standards applicable to TAC emissions. 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. 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. Thus, Project-related odor impacts would be less than cumulatively considerable.

#### **5.1.4 BIOLOGICAL RESOURCES**

**Wildlife Movement.** As discussed in Section 4.4, Biological Resources, of the Draft EIR, 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, for the Project would not interfere with the movement of native resident migratory fish. Further, there is no potential for wildlife nurseries to be present within the Project area. 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 sites 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. During construction activities, wildlife may temporarily avoid use of the PVSD Channel. 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.

**Local Policies and Ordinances Protecting Biological Resources.** As discussed in Section 4.4, Biological Resources, of the Draft EIR, 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. Further, 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 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. No significant impacts would occur, consistent with the conclusion presented in the PVCCSP EIR.

**Cumulative Impacts.** As discussed in Section 4.4, Biological Resources, of the Draft EIR, the PVCCSP area, including the Project area, is within the Western Riverside MSHCP and the City of Perris requires that all projects in the City comply with requirements of the Western Riverside County MSHCP. The MSHCP has identified approximately 500,000 acres for conservation. By providing the mechanism to preserve large habitat blocks and maintaining connectivity, the

MSHCP has minimized the cumulative impacts of proposed projects within the MSHCP study area. Cumulative impacts to biological resources are considered fully assessed and mitigated on a regional scale by the MSHCP. The Project area not occur within or adjacent to any MSHCP Cell Criteria, proposed MSHCP Conservation Areas, Cores, or Linkages. The Project would not result in a significant contribution to cumulative impacts related to wildlife movement.

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.

### 5.1.5 CULTURAL RESOURCES

**Historic Resources.** As identified in Section 4.5, Cultural Resources, of the Draft EIR, the Project area does not have buildings and historic maps and aerial photographs indicate no structures have ever been located within the Project area. The PVSD Channel is not eligible for listing in the California Register of Historic Resources (CRHR) and does not qualify as a significant resource under CEQA, and the Rider Street Bridge is not old enough to qualify as a historical resource. Further, the CRA, which would be protected in place as part of the Project, is an actively maintained buried pipeline with no historic surface elements or character-defining features. Therefore, no historic resources are located within the Project area or in the surrounding area and the Project would not cause a substantial adverse change to a historic resource.

**Cumulative Impacts.** Implementation of the Project would not result in a substantial adverse change to the significance of a historical resource and would not contribute to a significant cumulative impact to historical sites and/or resources.

### 5.1.6 ENERGY

**Wasteful, Inefficient, or Unnecessary Energy Consumption.** As identified in Section 4.6, Energy, of the Draft EIR, 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 conservations 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.

**Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency.** As identified in Section 4.6, Energy, of the Draft EIR, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, including the Integrative Energy Policy Report (IEPR), State of California Energy Plan, Title 24 Energy Efficiency Standards, Assembly Bill (AB) 1493 Pavley Regulations and Fuel Efficiency Standards, California's Renewable Portfolio Standards (RPS), and SB 350 (Clean Energy and Pollution Reduction Act of 2015).

**Cumulative Impacts.** As identified in Section 4.6, Energy, of the Draft EIR, as with the Project, cumulative development projects would be required to demonstrate that the wasteful, inefficient,



or unnecessary consumption of energy would not occur, and would be subject to the same regulatory requirements as the Project. As such, the Project would not result in a potentially cumulatively considerable environmental impact due to wasteful, inefficient, or unnecessary consumption of energy. Additionally, the Project would not conflict with or obstruction of a State or local plan for renewable energy or energy efficiency, and 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.

### 5.1.7 GEOLOGY AND SOILS

**Rupture of a Known Earthquake Fault.** As identified in Section 4.7, Geology and Soils, of the Draft EIR, the PVCCSP area is not located in an Alquist-Priolo Earthquake Fault Zone and there are no other known faults in the Project vicinity. The Project-specific Geotechnical Investigations concludes there are no known active or potentially active faults traversing the Project area and the site is not within an Alquist-Priolo Earthquake Fault Zone. Also, the City of Perris General Plan does not indicate the presence of any active faults. 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.

**Strong Seismic Shaking.** As identified in Section 4.7, Geology and Soils, of the Draft EIR, the Project area is in an area with high regional seismicity. The risk for seismic hazards is not substantially different than the risk to properties throughout the Southern California Area. In accordance with PVCCSP mitigation measure Geo 1, Project-specific Geotechnical Investigations have been prepared and include site-specific seismic design parameters and provides design/construction recommendations for geotechnical design, grading, construction, foundations, floor slabs, exterior flatwork, retaining walls, and pavement. The Project would be required to incorporate the recommendations identified in the Geotechnical Investigations. Moreover, the Project Applicant is required to implement seismic design considerations in accordance with the California Building Code. As such, the Project would not directly or indirectly expose people or structure to substantial adverse effects, including loss, injury, or death, involving seismic ground shaking impacts. Impacts would be less than significant.

**Landslides.** As identified in Section 4.7, Geology and Soils, of the Draft EIR, the PVCCSP area, which includes the Project area, is relatively flat and is 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. As such, the implementation of the Project would not expose people or structure within the Project area to substantial landslide risks. No impacts would occur.

**Soil Erosion or Loss of Top Soil.** As identified in Section 4.7, Geology and Soils, of the Draft EIR, short-term construction-related erosion potential would be addressed through compliance with National Pollutant Discharge Elimination System (NPDES) permit requirements, and SCAQMD Rule 403's requirements related to fugitive dust control, and impacts would be less than significant. 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 proposed 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. Additionally, the PVSD Channel is designed such that the velocities would be non-erosive. Erosion impacts would be less than significant.

**Soils Incapable of Supporting Septic Tanks.** As identified in Section 4.7, Geology and Soils, of the Draft EIR, the Project would connect to existing sewer facilities, and therefore septic tanks or an alternative wastewater disposal system would not be required. No impact would occur.

**Cumulative Impacts.** As identified in Section 4.7, Geology and Soils, of the Draft EIR, 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. 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, landslides). 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, 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.

The Project would connect to the existing sewer system. The Project does not include the use of septic tanks or alternative wastewater disposal systems. No cumulative impacts would occur.

#### **5.1.8 GREENHOUSE GAS EMISSIONS**

**Conflict with Plan, Policy, or Regulation Adopted to Reduce GHG Emissions.** As identified in Section 4.8, Greenhouse Gas Emissions, of the Draft EIR, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases, including the Senate Bill (SB) 32 (California Air Resources Board [CARB] 2017 Scoping Plan, and the City of Perris Climate Action Plan. Therefore, no impact would occur.

**Cumulative Impacts.** As identified in Section 4.8, Greenhouse Gas Emissions, of the Draft EIR, Project impacts due to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs also would be less than significant on a cumulatively-considerable basis.

#### **5.1.9 HAZARDS AND HAZARDOUS MATERIALS**

**Create a Significant Hazard to the Public or Environment Through Use, Transport, and/or Disposal of Hazardous Materials.** As identified in Section 4.9, Hazards and Hazardous Materials, of the Draft EIR, the Project's construction phase would include the use of heavy equipment, which would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, all of which are considered hazardous if improperly stored or handled. 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, and the RWQCB. With mandatory compliance to applicable hazardous materials regulations, the Project

would not create a significant hazard to the public or the environment and impacts would be less than significant.

The operation of the Project's proposed buildings would involve the use of materials common to urban development that are labeled hazardous. There is a potential for potential for routine use, storage, or transport of other hazardous materials; however, the precise materials are not known. The Project's future tenants would be required to comply with the requirements of the Hazardous Materials Transportation Act. Additionally, hazardous materials or wastes stored on-site would be subject to requirements associated with accumulation time limits, amounts, and proper storage locations and containers, and proper labeling. Moreover, for the 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 hazardous 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 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).

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.

**Emissions and/or Handling of Hazardous Materials Substances or Waste within One-Quarter Mile of an Existing or Proposed School.** As identified in Section 4.9, Hazards and Hazardous Materials, of the Draft EIR, there are no existing or proposed schools within one-quarter mile of the Project area. The closest school to the Project area is May Ranch Elementary School that is located approximately 0.4 miles east of the Rider 2 and Rider 4 building sites at the closest points. Moreover, there are no school located along truck routes that would be used for the Project. There would be no impact related to emissions of hazardous materials within ¼ mile of a school.

**Hazardous Materials Sites Compiled Pursuant to Section 65962.5 of the California Government Code.** As identified in Section 4.9, Hazards and Hazardous Materials, of the Draft EIR, the Project area is not included on any regulatory agency database reports, and is not located on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List). No impact would occur.

**Impair Implementation of or Interfere with an Emergency Response Plan.** As identified in Section 4.9, Hazards and Hazardous Materials, of the Draft EIR, emergency access throughout the PVCCSP area, including the Project area, would be maintained, and provided in accordance with the County of Riverside's Multi-Hazard Functional Plan, which is applicable to the Project, and development pursuant to the PVCCSP would not interfere with adopted emergency response or evacuation plans. Additionally, the Project includes roadway improvements to Morgan Street and Rider Street. 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. 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 nine 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. The detour routes appear to be viable routes to the east side of the Rider Street closure, including for emergency vehicles. 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. There would be a less than significant impact related to emergency response or evacuation plans because of the Project.

**Wildland Fires.** As identified in Section 4.9, Hazards and Hazardous Materials, of the Draft EIR, 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 (Exhibit S-16, Wildfire Constraint Areas) 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." No wildlands are located on the Project area and the Project area is surrounded by developed properties, paved roads, and maintained vacant sites. The Project area would not be susceptible to wildfires and there would be no impact.

**Cumulative Impacts.** As identified in Section 4.9, Hazards and Hazardous Materials, of the Draft EIR, 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 would not contribute to any cumulative impacts associated with an adopted emergency response plan or emergency evacuation plan. Additionally, fire hazards are anticipated to decline over time, and the Project would not contribute to any cumulative impacts related to wildland fires.

#### **5.1.10 HYDROLOGY AND WATER QUALITY**

**Violate Water Quality Standards or Waste Discharge Requirements or Substantially Degrade Surface or Groundwater Quality.** As identified in Section 4.10, Hydrology and Water Quality, of the Draft EIR, construction-related activities have the potential to result in impacts to water quality. 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, below), including implementation of a Storm Water Pollution Prevention Plan (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.

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. The proposed on-site storm drain system would convey 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. By complying with the NPDES permit and WQMP requirements (refer to RR 10-4, below) 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.

Construction activities 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.

**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 surrounding 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.

**Substantially Decrease Groundwater Supplies or Interfere Substantially with Groundwater Recharge Such that the Project May Impede Sustainable Groundwater Management of the**

**Basin.** As identified in Section 4.10, Hydrology and Water Quality, of the Draft EIR, according to the Project-specific Water Supply Assessment (WSA) prepared by EMWD groundwater would not be used to serve the Project and the Project would not have the potential to substantially decrease groundwater supplies. Further, the Project area is not located within a recharge area. Therefore, the Project is not anticipated to substantially decrease groundwater supplies or interfere with groundwater recharge and impacts would be less than significant.

**Alter the Existing Drainage Pattern Resulting in Erosion or Siltation On- or Off-Site, Flooding On-Site, or Off-Site, Contribute Runoff Water that Would Exceed the Capacity of Storm Water Drainage Systems, or Impede or Redirect Flood Flows.** As identified in Section 4.10, Hydrology and Water Quality, of the Draft EIR, implementation of the Project would increase the amount of impervious surface area on-site 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, 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, 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. Proposed improvements to the PVSD Channel are designed to accommodate 100-year storm flows. Therefore, the Project would not impede or redirect flood flows. Implementation of the Project would result in less than significant impacts.

**Conflict or Obstruct the Implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan.** As identified in Section 4.10, Hydrology and Water Quality, of the Draft EIR, 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.

The San Jacinto Groundwater Basin is a high priority basin. A Groundwater Sustainability Plan (GSP) for the West San Jacinto Groundwater Sub-basin has not been adopted; however, the Project would not conflict with the GSP 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 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.

**Cumulative Impacts.** As identified in Section 4.10, Hydrology and Water Quality, of the Draft EIR, 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. Because these requirements would be imposed on all developments, each development would be required to mitigate its own specific impact on water quality and drainage. No significant cumulative impacts related to surface or groundwater water quality would occur.

Existing regulations effectively minimize potential impacts to flow conveyance and flooding. The Project-related contribution to impacts associated with storm water flow conveyance would not be cumulatively considerable, and thus less than significant.

The Project would not 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.

#### **5.1.11 LAND USE AND PLANNING**

**Physically Divide an Established Community.** As identified in Section 4.11, Land Use and Planning, of the Draft EIR, 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. The Project would not physically divide an established community and no impact would occur.

**Conflict with any Land Use Plan, Policy, or Regulation to Avoid or Mitigate an Environmental Effect.** As identified in Section 4.11, Land Use and Planning, of the Draft EIR, the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including the Regional Transportation Plan/Sustainable Communities Strategy (refer to Tables 4.11-1 of the Draft EIR), the City of Perris General Plan 2030 (refer to Tables 4.11-2 of the Draft EIR), the City of Perris Zoning Ordinance, and the PVCCSP. Project impacts would be less than significant.

**Cumulative Impacts.** As identified in Section 4.11, Land Use and Planning, of the Draft EIR, 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 Project is consistent with the planned development for the Project area as anticipated in the PVCCSP. 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.

#### **5.1.12 MINERAL RESOURCES**

**Loss of Availability of a Known, Valuable Mineral Resource, or a Locally Important Mineral Resource Recovery Site.** As identified in Section 6.1.1, Mineral Resources, of the Draft EIR, no sites within the City of Perris city limits have been designated as locally important mineral resource recovery sites in the Perris General Plan or County of Riverside General Plan. Accordingly, no impact to the availability of a known, valuable mineral resource recovery site would occur.

**Cumulative Impacts.** Because the Project site is not identified as a significant source of sand/gravel deposits and future development within the City would not decrease the local or regional availability of mineral resources, no significant cumulative impacts would result.

#### **5.1.13 NOISE**

**Substantial Permanent Increase in Ambient Noise Levels from On-site Operations.** As identified in Section 4.12, Noise, of the Draft EIR, the Project-only operational noise levels were evaluated against exterior noise level thresholds based on the City of Perris  $L_{max}$  exterior noise level standards at the receiver locations. The operational noise levels associated with the Project



would satisfy the City of Perris operational noise level standards at all the nearest receiver locations. Further, the Project-related operational noise levels 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.

The Project would contribute a daytime operational noise level increase of up to 0.6 dBA Leq and a nighttime operation noise level increase of up to 3.3 dBA Leq at the receiver locations. The Project's increase in ambient noise would not exceed the significance criteria of 5 dBA when "without Project" noise levels are below 60 dBA CNEL or 3 dBA when "without Project" noise levels exceed 60 dBA CNEL. Thus, the Project's increase in ambient noise is considered less than significant.

**Result in Excessive Groundborne Vibration and Groundborne Noise Levels.** As identified in Section 4.12, Noise, of the Draft EIR, the Project's construction activities most likely to cause vibration impacts include heavy construction equipment and trucks. Using the construction vibration assessment methods provided by the Federal Transit Administration (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.

During Project operation, truck haul trips are anticipated to be primary source of vibration. 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.

**Cumulative Impacts.** As identified in Section 4.12, Noise, of the Draft EIR, it is unlikely that other sources of vibration would occur concurrent with Project construction activities; therefore, construction-related vibration 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 analysis of operational-related noise level contributions, which are presented in Table 4.12-7, Project Daytime Noise Level Contribution (dBA Leq), and Table 4.12-8, Project Nighttime Noise Level Contribution (dBA Leq), demonstrates that Project-related operational noise would not result in a cumulative increase in noise levels that exceeds the City's thresholds of significance.

#### **5.1.14 POPULATION AND HOUSING**

**Induce Substantial Population Growth.** As identified in Section 6.1.2, Population and Housing of the Draft EIR, the Project does not involve the development of residential uses and would not directly increase the population in the City of Perris. The Project would create short-term jobs during the construction phase, which would be filled by workers who, for the most part, would already reside in the local area and would not generate a substantial temporary or permanent increase in population within the Project area. The employment generation estimated for the Project (up to approximately 1,313 employees) would represent approximately 2.3 percent of the total employment generation anticipated in the PVCCSP area. It is also anticipated that these new warehouse 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. 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.

**Displace Substantial Numbers of Existing Housing or People.** As identified in Section 6.1.2, Population and Housing of the Draft EIR, the Project area is undeveloped and the Project would not result in the displacement of existing housing or people, nor necessitate the construction of replacement housing elsewhere.

**Cumulative Impacts.** The Project is consistent with the General Plan, zoning, and PVCCSP land use and growth assumptions for the Project area. The Project would not contribute to population growth and therefore would not result in an increased demand on the current or future housing in the region. The Project would not require an influx of new workers who would need to locate temporarily or permanently in the area. Implementation of the Project would not result in a cumulatively significant population or housing impact, nor would the proposed uses significantly induce growth in areas where growth was not previously anticipated.

#### 5.1.15 PUBLIC SERVICES

As identified in Section 6.13, Public Services, of the Draft EIR, the City of Perris has concluded that the Project would not result in potentially significant impacts to public services as discussed below.

**Fire Protection.** The Project would be designed and operated per applicable standards required by the City, and Riverside County Fire Department (RCFD). Implementation of the Project would not involve new residential uses or an increase in the City's population; however, the operation of two new industrial warehouse uses would increase the demand for fire protection, prevention, and emergency medical services at the currently undeveloped Project area. The development of the Project would not cause fire staffing, facilities, or equipment to operate at a deficient level of service. The 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 because 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 significant impacts related to fire protection facilities would result with implementation of the Project.

**Police Protection.** The Project would be designed and operated per applicable standards required by the City, Riverside County Sheriff's Department (RCSD), and PVCCSP for new development in regards to public safety. In addition, the Project 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 significant impacts related to police protection facilities would result with implementation of the Project.

**Schools.** The Project area is located within the boundaries of the Val Verde Unified School District (VVUSD). The Project would not directly 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. Additionally, it is expected that the new jobs that would be created by the Project would be filled by residents of the City and surrounding area and the Project would not induce population growth. 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 Project impacts to school services would result.

**Parks.** The Project area does not contain any parkland or recreational facilities. The nearest park to the Project area is Morgan Park Phase I located northeast. The Project does not propose new residential uses and would not result in a direct increase in the population within the City. As stated above, it is expected that the new jobs that would be created by the Project would be filled by residents of the City and the surrounding area and the Project would not induce population growth. 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. No significant Project impacts to parks would result.

**Other Public Facilities.** 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.

**Cumulative Impacts.** New development within the service areas of the RCSD and RCFD would be required to adhere to conditions established by fire and police service providers, and pay the applicable fees to ensure adequate staffing and equipment levels. Therefore, there would be no cumulative impact on police and fire services in the City. The Project would not generate new population in the City and would result in less than significant cumulative impacts to school, park, and other public facilities.

#### **5.1.16 RECREATION**

**Increased Use of Existing Neighborhood and Regional Parks or Other Recreational Facilities.** As identified in Section 6.1.4, Recreation, of the Draft EIR, 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. The City requires that large projects provide an on-site recreational amenity. The Project would provide employee amenities and would not result in or accelerate the physical deterioration of existing neighborhood and regional parks or recreational facilities. The Project would not increase the use of existing neighborhood and regional parks or other recreational facilities, and no environmental impacts would result.

**Construction or Expansion of Recreational Facilities.** The Project does not involve the development of residential uses, and the proposed industrial uses would not create an increase in the use of such facilities. In addition to the on-site employee amenities, the Project involves implementation of a linear trail that abuts the northern boundary of the segment of the "MWD trail" as designated in the PVCCSP 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 physical impacts associated with construction and operation of the on-site amenities and recreational features are addressed throughout the analysis presented in the 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.

**Cumulative Impacts.** Implementation of the Project would not increase the use of existing parks and recreation facilities; therefore, the Project would not contribute to cumulative impacts. Additionally, as future residential development is proposed, the City will require developers to provide the appropriate amount of parkland or payment of in-lieu fees, which will contribute to future recreational facilities. Payment of these fees and/or implementation of facilities on a project-by-project basis would offset cumulative parkland impacts by providing funding for new and/or renovated parks equipment and facilities. The Project would result in less than significant cumulative impacts.

### 5.1.17 TRANSPORTATION

**Conflict or be Inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b).** The City of Perris adopted its *Transportation Impact Analysis Guidelines for CEQA* (TIA Guidelines) in June 2020. The screening criteria adopted by the City of Perris are based on the recommendations from California Office of Planning and Research (OPR) and the Western Riverside Council of Governments (WRCOG) for setting screening thresholds for land use projects, and include: a project that provides 100 percent affordable housing, a project within one-half mile of qualifying transit, a project that is a local serving land use, a project in a low VMT area, and a project with net daily trips less than 500 ADT. Relevant to the Project, projects that locate in areas with low VMT, and that incorporate similar features (i.e., land use type, access to the circulation network, etc.), will tend to exhibit similarly low VMT. If a project is located in a Traffic Analysis Zone (TAZ) with VMT per capita or VMT per employee that is less than or equal to the citywide average, then the project is considered to be located in a low VMT area and can be presumed to have a less than significant impact on VMT. As required by the City's TIA Guidelines, an initial screening assessment utilizing the City of Perris VMT Scoping Form for Land Use Projects was completed for the Project. 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, and no additional VMT modeling is required to reduce the Project's impact on VMT.

**Cumulative Impacts.** The Project is consistent with land use designations in both the City of Perris's General Plan, and the PVCCSP, and is within a low VMT area, resulting in a less than significant transportation impact. No further VMT analysis is required and the Project's cumulative impact is considered less than significant.

### 5.1.18 TRIBAL CULTURAL RESOURCES

**Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource Listed or Eligible for Listing in the CRHR, or in a Local Register of Historical Resources.** As identified in Section 4.14, Tribal Cultural Resources, of the EIR, based on the records search and literature review of the Project area and surrounding areas, 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.

**Cumulative Impacts.** The Project would not impact tribal cultural resources listed or eligible for listing in the CRHR or in a local register of historical resources and would not contribute to cumulative impacts to such resources.

## 5.1.19 UTILITIES AND SERVICE SYSTEMS

### **Require or Result in the Relocation or Construction of New or Expanded Utility Facilities.**

As identified in Section 4.15, Utilities and Service Systems, of the Draft EIR, domestic and recycled water infrastructure, sewer lines, storm drain infrastructure, and dry utilities would be installed as part of the Project 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 the 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 additional Project-level mitigation measures for construction identified for each topical issue would address potential significant impacts associated with construction and installation of utilities. Therefore, through implementation of a variety of measures related to construction impacts, no additional impacts related to construction and operation of utility systems would occur.

**Sufficient Water Supplies:** As identified in Section 4.15, Utilities and Service Systems, of the Draft EIR, in compliance with Sections 10910–10915 of the *California Water Code*, a WSA was prepared for the PVCCSP to assess the impact of development allowed by the PVCCSP on existing and projected water supplies. Although the Project implements the PVCCSP and the water demand from the Project was anticipated in the PVCCSP WSA, a Project-specific WSA was also prepared by EMWD for the Project. The Project demand will be served using imported water from Metropolitan, supplemented with new local supply projects during multiple-dry years, if needed. The water 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 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.

**Exceed the Wastewater Treatment Provider Capacity.** As identified in Section 4.15, Utilities and Service Systems, of the Draft EIR, the Project's proposed warehouse buildings are estimated to generate approximately 110,500 gpd (0.1 million gallons per day) of wastewater that would be treated at the Perris Valley Regional Water Reclamation Facility (PVRWRF). 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 and Project impacts would be less than significant.

**Generated Solid Waste in Excess of the Capacity of Local Infrastructure.** As identified in Section 4.15, Utilities and Service Systems, of the Draft EIR, and based on solid waste generation factors outlined in the PVCCSP EIR, construction of the Project would generate approximately 2,637.8 tons of solid waste over the construction period, and operation of the Project would generate approximately 14,609.5 tons per year of solid waste requiring landfill disposal. However, based on more stringent requirements for waste reduction and diversion from landfills (65 percent per the Cal Green Code), solid waste diverted to landfills would be reduced compared to the estimate in the PVCCSP EIR. The disposal of operational solid waste associated with the Project

would not exceed the permitted capacity of the Badlands or El Sobrante Landfills, and there would be a less than significant impact.

**Comply with Federal, State, and Local Statutes and Regulations Related to Solid Waste.**

As identified in Section 4.15, Utilities and Service Systems, of the Draft EIR, the Project would be required to coordinate with CR&R Waste Services to develop a collection program for recyclables, 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 solid waste management requirements established by local, State, and federal solid waste management regulations, including the California Integrated Waste Management Act of 1989 (AB 939); and SB 1016, which builds on AB 939. With application of 38 programs to reduce solid waste generation, the City of Perris achieves established solid waste diversion requirements. 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.

**Cumulative Impacts.** As identified in Section 4.15, Utilities and Service Systems, of the Draft EIR, 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. As with the Project, individual cumulative development projects would require the construction of necessary infrastructure 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 the 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. 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. 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 the 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. 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 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.

#### **5.1.20 WILDFIRE**

**Location in a State Responsibility Area or Very High Fire Hazard Severity Zone.** As discussed in Section 6.1.5, Wildfire, of the Draft EIR, the Project area is not located in or near an area identified as being a “Wildfire Hazard Area” in the General Plan, and is not located in a Very High Fire Hazard Severity Zone (VHFHSZ) of the City. The Project area is located within the limits of the City of Perris, and is therefore not within a State Responsibility Area (SRA).

**Cumulative Impacts.** The Project would have no Project impacts related to wildfires and would not contribute to cumulative wildfire impacts.

### **5.2 EFFECTS DETERMINED TO BE MITIGATED TO LESS THAN SIGNIFICANT LEVELS**

The IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project EIR found that the Project would result in less than significant impacts for certain impact categories with incorporation of applicable PVCCSP EIR mitigation measures into the Project. The City of Perris previously adopted Findings for those impacts and mitigation measures as part of the certification of PVCCSP EIR and approval of PVCCSP; however, the appropriate Findings are restated in this section.

The IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project EIR also determined that the Project would result in less than significant impacts for certain impact categories based on (1) incorporation of design features into the Project to reduce potential environmental impacts (project design features [PDF]), and/or (2) implementation of Project-level mitigation measures identified to reduce potentially significant Project impacts to a less than significant level.

PVCCSP EIR mitigation measures incorporated into the Project, project design features, and additional project-level mitigation measures will be implemented pursuant to the MMRP prepared for the Project and included as Section 4.0 of the Final EIR.

The City of Perris, having reviewed and considered the information contained in the EIR, the Technical Appendices and the administrative record, finds, pursuant to Section 21081(a)(1) of the *California Public Resources Code* and Section 15091(a)(1) of the State CEQA Guidelines that “changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR” for the following categories which are further discussed below.

- Aesthetics (light and glare during construction)
- Air Quality (expose sensitive receptors to substantial pollutant concentrations during construction and associated cumulative impacts)
- Biological Resources (effects on candidate, sensitive or special status species; riparian habitat, sensitive natural community, or federally protected wetlands; and habitat conservation plan, natural conservation community plan, or other plan [MSHCP])
- Cultural Resources (archaeological resources and human remains)
- Geology and Soils (seismic-related ground failure including liquefaction; unstable soil; expansive soils; and paleontological resources)
- Hazards and Hazardous Materials (create a significant hazard through upset and accident conditions involving the release of hazardous materials, and safety hazard for those residing or working within an airport land use plan)
- Hydrology and Water Quality (risk release of pollutants due to project inundation)
- Noise (substantial temporary increase in ambient noise levels from construction, and located within an airport land use plan and would expose people to excessive noise levels)
- Transportation (conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway bicycle, and pedestrian facilities; increase hazards due to a geometric design feature; emergency access; and, cumulative impacts)
- Tribal Cultural Resources (cause a substantial adverse change in the significance of a tribal cultural resource, and cumulative impacts)

### **Findings:**

**The City finds that, based on substantial evidence in the record, the following impacts, to the extent they result from the Project, can be mitigated to less than significant levels.**

#### **5.2.1 AESTHETICS**

**Light and Glare During Construction.** As identified in Section 4.1, Aesthetics, of the Draft EIR, night time lighting would be needed at certain times during construction activities 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 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.



**Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The potential impacts from light and glare during construction have been eliminated or substantially lessened to a level of less than significant by virtue of Project-level mitigation measure MM 1-1 (Draft EIR page 4.1-21).

**Additional Project-Level Mitigation Measure**

**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.

**5.2.2 AIR QUALITY**

**Expose Sensitive Receptors to Substantial Pollutant Concentrations During Construction and Associated Cumulative Impacts.** As discussed in Section 4.2, Air Quality, of the Draft EIR, during the Project's construction phase, the Project's localized construction-source emissions would exceed the thresholds of significance for emissions of PM<sub>10</sub> and PM<sub>2.5</sub> during the 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 and MM Air 9 and Project-level MM 3-15 [replaces PVCCSP EIR MM Air 6]). After implementation of these mitigation measures, localized emissions resulting from the Project construction would not exceed localized thresholds of significant for emissions of any criteria pollutant. Impacts would be less than significant and no additional mitigation is required. Further, As discussed in the Project's construction health risk assessment memorandum, the Project would not expose sensitive receptors to construction-related DPM and impacts would be less than significant.

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

**Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid**

**or substantially lessen the significant environmental effect as identified in the Final EIR.**

**2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The potential for the Project to expose sensitive receptors to substantial pollutant concentrations, and associated cumulative impacts, have been eliminated or substantially lessened to a level of less than significant by incorporation of PVCCSP EIR mitigation measures MM Air 3 and MM Air 9 (Draft EIR pages 4.3-22 and 4.3-23), and Project-level MM 3-15 (replaces PVCCSP EIR MM Air 6).

**Applicable PVCCSP EIR Mitigation Measures**

**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 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.

**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.

### **Additional Project-Level Mitigation Measures**

**MM 3-15** Prior to grading permit issuance, the City of Perris Planning Division and City of Perris Engineering Division shall review and approve a construction management plan. The construction management plan also shall include the following notes. Project contractors shall be required to comply with these notes and permit periodic inspection of the construction site by City of Perris staff to confirm compliance.

During construction activity, all off-road construction equipment with more than 50 horsepower shall be California Air Resources Board (CARB) Tier 3 Compliant or better.

If Tier 4 Final Compliant equipment can be reasonably and feasibly acquired by the Project grading contractor, Tier 4 Final Compliant equipment shall be used in lieu of Tier 3 Compliant or Tier 4 Interim Compliant equipment. If Tier 4 Final Compliant equipment is not economical to use during grading activity due to lack of local availability of such equipment, the Project Applicant or contractor(s) shall provide evidence to the City of Perris showing that the contractor(s) attempted to secure the use of Tier 4 Final Compliant equipment, but such equipment was not locally available (within a 50-mile radius). or was uneconomical to use due to a lack of supply of such equipment. All Tier 3 Compliant and Tier 4 Interim Compliant equipment over 50 horsepower, if used, shall be fitted with Best Available Control Technology (BACT) devices, if technically feasible and if the BACT devices can be reasonably acquired by the Project grading contractor, to minimize air pollutant emissions.

The contractor(s) shall keep a copy of each unit's certified tier specification and California Air Resources Board (CARB) on the Project Site in a location available to the City or City designee for inspection upon request. The City shall review and approve the list of equipment over 50 horsepower, their CARB tier levels, and list of BACT devices installed on Tier 3 Compliant and Tier 4 Interim Compliant equipment, prior to the mobilization of equipment to the site.

### **5.2.3 BIOLOGICAL RESOURCES**

**Effects on Candidate, Sensitive, or Special Status Species.** As discussed in Section 4.4, Biological Resources, of the Draft EIR, implementation of the 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. The Project would temporarily impact approximately 0.20-acre of disturbed southern riparian scrub within the PVSD Channel; however, the riparian area is not anticipated to support high value

biological functions and values due to high cover of non-native plant species and routine mowing. Additionally, measures to ensure consistency with the MSHCP and to ensure any temporary impacts that would occur would be implemented. The Project would not impact lands designated as critical habitat by the USFWS, as none is present within the Project area.

The Project would not result in any impacts to special-status plants as no special-status plant species are present within the Project area. The Project area is located within the Narrow Endemic Plant Species Survey Areas (NEPSSA) and Criteria Area Plant Species Survey Area (CAPSSA); however, 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.

The Project area is located within the Stephen's Kangaroo Rat (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 and have a low potential to occur in the PVSD Channel improvement area. 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.

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. 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 these species are Covered Species under the MSHCP, with any potential impacts mitigated through compliance with the MSHCP. A single burrowing owl was observed north of the Rider 4 site during focused surveys; however, no burrowing owl individuals or signs of burrowing owl use were observed within the Project impact area. 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.

The Project also 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. 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.

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 discussed 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, the Project would result in a less than significant indirect impacts to special-status biological resources.

### **Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The potential impacts to species identified as a candidate, sensitive, or special status species have been eliminated or substantially lessened to a level of less than significant by incorporation of PVCCSP EIR mitigation measures MM Bio 1 and MM Bio 2 (Draft EIR pages 4.4-21 and 4.4-22).

### **Applicable PVCCSP EIR 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 would be conducted for implementing development or infrastructure projects within burrowing owl survey areas. A pre-construction survey for resident burrowing owls

would also be conducted by a qualified biologist within 30 days prior to commencement of grading and construction activities within those portions of implementing Project areas containing suitable burrowing owl habitat and for those properties within an implementing Project area 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 would be conducted in accordance with the current Burrowing Owl Instruction for the Western Riverside MSHCP.

If active nests are identified on an implementing Project area 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 area 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<sup>1</sup>. 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 can leave the nest and fly) by installing one-way doors in burrow entrances. These one-way doors allow the owl to exit the burrow, but not enter it. These doors shall be left in place 48 hours to ensure owls have left the burrow. Artificial burrows shall be provided nearby. The implementing project area shall be monitored daily for one week to confirm owl use of burrows before excavating burrows in the impact area. Burrows shall be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible pipe shall be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow. The CDFG shall be consulted prior to any active relocation to determine acceptable receiving sites available where this species has a greater chance of successful long-term relocation. If avoidance is infeasible, then a DBESP would be required, including associated relocation of burrowing owls. If conservation is not required, then owl relocation would still be required following accepted protocols. Take of active nests would be avoided, so it is strongly recommended that any relocation occur outside of the nesting season.

**Riparian Habitat, Sensitive Natural Community, or Federally Protected Wetlands.** As discussed in Section 4.4, Biological Resources, of the Draft EIR, 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, the proposed PVSD Channel improvement would temporarily impact approximately 3.37 acres and 2,660 linear feet of Water of the United States (WoUS) that is subject to the jurisdiction of the Corps and RWQCB (all non-riparian) and approximately 6.38 acres and 2,660 linear feet of streambed that is subject to the jurisdiction of CDFW. Additionally, the Project's proposed PVSD Channel improvements would permanently impact approximately 0.98 acre and 415 linear feet of WoUS that is subject to the jurisdictions of the Corps and the

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<sup>1</sup> As of January 1, 2013, the California Department of Fish Game (CDFG) is referred to as the California Department of Fish and Wildlife (CDFW).

RWQCB (all non-wetland waters) and 1.14 acres and 415 linear feet of streambed that is subject to the jurisdiction of CDFW (all non-riparian). 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, most of these impacts are only temporary.

The Project's PVSD Channel improvements would result in temporary impacts to MSHCP Riparian/Riverine vegetation totaling approximately 0.20 acre and 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. These MSHCP Riverine resources include ruderal upland, ruderal channel, and developed area. Although these types of resources may provide potentially important hydrological functions and values, the vegetation types found within the Project impact area are not anticipated 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, most of these impacts are only temporary.

The Project's proposed PVSD Channel improvements would increase the amount of Corps/RWQCB and CDFW jurisdiction on-site beyond pre-project conditions by up to 20 acres; therefore, the Project is self-mitigating and impacts would be reduced to a less than significant level. Notwithstanding this conclusion, the Project Applicant would incorporate PVCCSP EIR mitigation measures Bio 3 and Bio 4 to reduce impacts to riparian habitat, wetlands, and other sensitive natural communities. PVCCSP EIR mitigation measure MM Bio 3 would require the Project Applicant to obtain a Clean Water Act Section 404 permit and a Section 401 Water Quality Certification. Additionally, potential impacts to CDFW jurisdiction would require a Streambed Alteration Agreement. Further, the Project Applicant would incorporate PVCCSP EIR mitigation measure MM Bio 4, which would require that a Determination of Biologically Equivalent or Superior Preservation (DBESP) be drafted and approved by the City. 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.

**Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
  
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The potential impacts to riparian habitat, other sensitive natural community, or wetlands have been eliminated or substantially lessened to a level of less than significant by incorporation of PVCCSP EIR mitigation measures MM Bio 3 and MM Bio 4 (Draft EIR pages 4.4-22 and 4.4-23).

**Applicable PVCCSP Mitigation Measures**

**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.

**Habitat Conservation Plan, Natural Conservation Community Plan, or Other Plan (MSHCP).** As discussed in Section 4.4, Biological Resources, of the Draft EIR, 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). As discussed previously, 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.

As discussed 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 impact MSHCP riparian resources. 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; 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. The Project would be consistent with Volume I, Section 6.1.2 of the MSHCP.

Although the Project area is not within a MSHCP Criteria Area or Criteria Cell, the Project's proposed development is anticipated to occur adjacent to a MSHCP Conservation Area and has the potential to result in edge effects. To minimize edge effects, guidelines pertaining to urban/wildland interface 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. The Project has the potential to result in significant impacts related to conflicts with lighting, noise, and barriers guidelines. As discussed below, 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.

- 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. As required by mitigation measure MM 1-1, presented previously under Aesthetics, if night lighting is required during construction, it 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.

- 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. 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. If this is not feasible, the Project Applicant would incorporate Project-level mitigation measure MM 4-2, which would require 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 Project-level mitigation measure MM 4-2, potential noise impacts would be reduced to a less than significant level.
- Due to the Project area's proximity to an MSHCP Conservation Area, the Project Applicant would be required to incorporate barriers, where appropriate to minimize unauthorized public domestic animal predation, illegal trespass, or dumping in the MSHCP Conservation Area. Further, the Project Applicant would implement Project-level mitigation measure MM 4-1, which requires orange slit fencing to be place 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. With implementation of Project-level mitigation measure MM 4-1, impacts to the MSHCP Conservation Area would be less than significant.

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. 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.

### **Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**

**2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The potential for impacts due to a conflict with an adopted habitat conservation plan or natural community conservation plan, and specifically the Western Riverside County MSHCP, have been eliminated or substantially lessened to a level of less than significant by incorporation of PVCCSP EIR mitigation measure MM Bio 2 (Draft EIR page 4.4-23) and Project-level mitigation measures MM 1-1 (Draft EIR page 4.1-21), MM 4-1 and MM 4-2 (Draft EIR pages 4.4-34 and 4.4-35).

**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 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.

**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. 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. Cumulative impacts to biological resources are considered fully assessed and mitigated on a regional scale by the MSHCP.

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. However, impacts to native birds by the 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 Project Applicant would incorporate PVCCSP EIR mitigation measure MM Bio 1 and Project-level mitigation measure MM 4-2, which would reduce Project impacts to a less than significant level. The Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to nesting birds.

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. As such, 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. The Project would not result in a cumulatively considerable contribution to a significant cumulative impact related to jurisdictional water or riparian resources.

### **Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The Project’s potential cumulative impacts are eliminated or substantially lessened to a level of less than significant by incorporation of PVCCSP EIR mitigation measure MM Bio 2 (Draft EIR page 4.4-23) and Project-level mitigation measure MM 4-2 (Draft EIR pages 4.4-34 and 4.4-35), identified above.

### **5.2.4 CULTURAL RESOURCES**

**Archaeological Resources.** As discussed in Section 5.5, Cultural Resources, of the Draft EIR, in compliance with PVCCSP EIR mitigation measure MM Cult 1, a Phase I Cultural Resources Survey Report was completed for the Project. According to the records searches conducted by BFSAs, 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 Metropolitan property). However, implementation of the Project would have no substantial adverse change to the CRA. Further, due to 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.

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. 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. The Project Applicant would implement Project-level mitigation measure MM 5-1, which implements PVCCSP EIR mitigation measure MM Cult 2, and 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 the implementation of mitigation measure MM 5-1, potential impacts to archaeological resources would be reduced to a less than significant level.

### **Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
  
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The potential impacts to archaeological resources have been eliminated or substantially lessened to a level of less than significant by previous completion of PVCCSP EIR mitigation measure MM Cult 1 (Draft EIR pages 4.5-11 through 4.5-12), and implementation of Project-level mitigation measure MM 5-1 (Draft EIR pages 4.5-14 through 4.5-16).

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

**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 archeologist<sup>2</sup> 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

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<sup>2</sup> 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.

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 area.

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 area.

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. ***This mitigation measure was completed with preparation of the Draft EIR.***

## **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.

**Human Remains.** As discussed in Section 5.5, Cultural Resources, of the Draft EIR, the PVCCSP area has been historically used for agriculture use and therefore, not expected to contain human remains, including those interred outside of formal cemeteries. 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. Additionally, the Project Applicant would implement Project-level mitigation measure MM 5-2, which implements PVCCSP EIR mitigation measure MM Cult 6. The incorporation of Project-level mitigation measure MM 5-2 would further reduce potential impacts to human remains. Impacts would be less than significant.

## **Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The potential impacts to human remains have been eliminated or substantially lessened to a level of less than significant by incorporation of the Project-level mitigation measure MM 5-2 (Draft EIR pages 4.5-16 through 4.5-17).

## **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 5097.98l and 5097.94(k)).

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

**Cumulative Impacts – Archeological Resources and Human Remains.** As discussed in Section 5.5, Cultural Resources, of the Draft EIR, direct impacts to on-site cultural resources are site-specific. 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. 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. As such, 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 Project would not result in a cumulatively considerable contribution to a significant cumulative impact to archaeological resources.

Additionally, 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 Project, treat human remains that may be uncovered during development activities in accordance with prescribed, respectful and appropriate practices, thereby avoiding significant cumulative impacts.

### **Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
  
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The Project's potential cumulative impacts have been eliminated or substantially lessened to a level of less than significant by previous completion of the PVCCSP EIR mitigation measure MM Cult 1 (Draft EIR pages 4.5-11 through 4.5-12) and implementation of Project-level mitigation measures MM 5-1 and MM 5-2 (Draft EIR pages 4.5-14 through 4.5-17).

### **5.2.5 GEOLOGY AND SOILS**

**Seismic-Related Ground Failure Including Liquefaction.** As discussed in Section 4.7, Geology and Soils, of the Draft EIR, the Project-specific Geotechnical Investigation indicated that the Project area is within an area that has a moderate to high liquefaction susceptibility. Potentially liquefiable soils were encountered at the boring locations. 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 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. 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.

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.

### **Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The Project's potential impacts related to ground failure have been eliminated or substantially lessened to a level of less than significant by incorporation of PVCCSP EIR mitigation measure MM Geo 1 (Draft EIR page 4.7-7).

### **Applicable PVCCSP EIR 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.

**Unstable Soil.** As discussed in Section 4.7, Geology and Soils, of the Draft EIR, the potential for lateral spreading and landslide is low, as the PVCCSP area is relatively flat; however, the potential for subsidence is high. 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.

The Geotechnical Investigations also 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. 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.

Representative samples of the near-surface soils at the Rider 2 and Rider 4 sites were submitted for testing to determine the soluble sulfate content; the results of the testing indicated a negligible classification.

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.

**Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The Project's impacts related to unsuitable soils have been eliminated or substantially lessened to a level of less than significant by incorporation of PVCCSP EIR mitigation measure MM Geo 1 (Draft EIR page 4.7-7).

**Expansive Soils.** As discussed in Section 4.7, Geology and Soils, of the Draft EIR, 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, and soils on the Rider 4 site possess a low expansion potential. The Project Applicant would incorporate the recommendations identified in the Geotechnical Investigations to ensure that the proposed buildings are not located on expansive soils. 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.

**Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid**

**or substantially lessen the significant environmental effect as identified in the Final EIR.**

**2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The Project's potential impacts related to expansive soils have been eliminated or substantially lessened to a level of less than significant by incorporation of PVCCSP EIR mitigation measure MM Geo 1 (Draft EIR page 4.7-7).

**Directly or Indirectly Destroy a Unique Paleontological Resource or Site or Unique Geologic Feature.** As discussed in Section 4.7, Geology and Soils, of the Draft EIR, 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 assigned a "high paleontological resource sensitivity." As such, the Project's deeper ground-disturbing activities could result in a significant impact to paleontological resources. The Project Applicant would implement Project-level mitigation measure MM 7-1, which is an updated version of PVCCSP EIR mitigation measure MM Cult 5. MM 7-1 requires monitoring during grading activities, identifies the role of the monitor, and identifies the salvage and resource recovery measures that must be implemented if paleontological resources are found. With implementation of MM 7-1, impacts to paleontological resources be less than significant.

**Findings:**

**1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**

**2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The potential impacts on paleontological resources have been eliminated or substantially lessened to a level of less than significant by incorporation of Project-level mitigation measure MM 7-1 (Draft EIR pages 4.7-16 and 4.7-17).

**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 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.

**Cumulative Impacts.** As discussed in Section 4.7, Geology and Soils, of the Draft EIR, 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 (refer to PVCCSP EIR mitigation measures MM Geo 1). 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., liquefaction, 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.

Additionally, 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 Project-level 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. Therefore, a less than significant cumulative impact related to paleontological resources would occur with implementation of the Project.

**Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
  
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The Project's contribution to potential cumulative impacts to geology and soils have been eliminated or substantially lessened to a level of less than

significant by incorporation of PVCCSP EIR mitigation measure MM Geo 1 (Draft EIR page 4.7-7) and Project-level mitigation measure MM 7-1 (Draft EIR page 4.7-16 – 4.7-18).

## 5.2.6 HAZARDS AND HAZARDOUS MATERIALS

**Create a Significant Hazard to the Public or Environment Through Upset and Accident Conditions Involving the Release of Hazardous Materials.** As discussed in Section 4.9, Hazards and Hazardous Materials, of the Draft EIR, the Project-specific Phase I Environmental Site Assessment (ESA) identified that the Project area was historically undeveloped and/or was used for agricultural purposes from at least 1901 until the present. The Phase I ESA concluded there are no Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), or Historical Recognized Environmental Conditions (HRECs) or other significant issues of concern. 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 and pesticide sampling was completed. The laboratory results indicated no detectable to low concentrations of organochlorine pesticides (OCPs), well below both the DTSC-Screening Levels for industrial/commercial land use and EPA-Regional Screening Levels for industrial/commercial land use. Impacts would be less than significant. The concentrations of arsenic detected in the Project area would also be considered low based on guidance provided by the DTSC. 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, resulting in a less than significant impact.

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. 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, 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 would be implemented and would address the presence of contaminated soil through appropriate sampling and testing, disposal, and/or remediation. This impact would be less than significant.

### **Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** It is unlikely that contaminated soils would be encountered at the Project area. However, potential impacts have been eliminated or substantially lessened to a level of less than significant by virtue of the incorporation of PVCCSP EIR mitigation measure MM Haz 7 (Draft EIR pages 4.9-12 and 4.9-13).

## **Applicable PVCCSP EIR Mitigation Measures**

**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 would 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.

**Safety Hazard for Those Residing or Working Within an Airport Land Use Plan or Within Two Miles of a Public or Public Use Airport.** As identified in Section 4.9, Hazards and Hazardous Materials, of the Draft EIR, the PVCCSP area, including the Project area, is within the March Air Reserve Base/Inland Port (MARB/IP) Airport Influence Area (AIA). The Project area is also within the City's Airport Overlay Zone (AOZ), created to accommodate development within the City consistent with the land use designations of the 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, MARB/IP Airport Land Use Compatibility Zones, of the Draft EIR, 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. Hazards to flight are prohibited in Compatibility Zone C1 and Zone D. The average occupancy of the Rider 2 building (44 people per acre) is significantly below the 100 people per acre average intensity allowed in Compatibility Zone C1, and 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. Further, the Project does not involve any of the prohibited uses in Compatibility Zone C1. As further discussed below, the Project would not expose people working at the proposed Rider 2 and Rider 4 buildings to excessive noise levels from airport operations.

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. The Project incorporates PVCCSP EIR 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 hazards to flight. Accordingly, as discussed below impacts would be less than significant.

- 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 feet 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.
- PVCCSP EIR mitigation measure MM Haz 2 requires the Applicant to convey an avigation 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.

**Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** Potential safety hazards related to the MARB/IPA have been eliminated or substantially lessened to a level of less than significant by incorporation of PVCCSP EIR mitigation measures MM Haz 2 through MM Haz 6 (Draft EIR pages 4.9-11 and 4.9-12) into the Project.

**Applicable PVCCSP EIR Mitigation Measures**

- MM Haz 2** Prior to the recordation of a final map, issuance of a building permit, or conveyance to an entity exempt from the Subdivision Map Act, whichever occurs first, the landowner shall convey an avigation easement to the MARB/March Inland Port Airport Authority.
- MM Haz 3** Any outdoor lighting installed shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane.
- MM Haz 4** The following notice shall be provided to all potential purchasers and tenants:
- “This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example, noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you. Business & Profession Code 11010 13(A)”
- MM Haz 5** The following uses shall be prohibited:
- (a) Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.



- (b) Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.
- (c) Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area.
- (d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.
- (e) All retention and water quality basins shall be designed to dewater within 48 hours of a rainfall event.

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

### **5.2.7 HYDROLOGY AND WATER QUALITY**

**Risk Release of Pollutants Due to Project Inundation.** As discussed in Section 4.10, Hydrology and Water Quality, of this Draft EIR, the Project area is located approximately 40 miles northeast of the Pacific Ocean and there are no enclosed bodies of water in proximity to the Project area. Therefore, the Project would not risk the release of pollutants due to a tsunami or seiche. However, 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). The Project includes implementation of planned PVCMDP improvements to the PVSD Channel to accommodate 100-year storm flows. 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. Figure 4.10-1, Existing and Proposed Floodplain Delineation, of the Draft EIR depicts the 100-year flood plain within the PVSD Channel with implementation of the proposed improvement. 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. The Project Applicant would incorporate 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 from flooding.

The Project area is also within the potential dam inundation plain of Lake Perris to the immediate northeast of the City. 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.

**Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
  
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** Potential safety hazards related to release of pollutants due to Project inundation have been eliminated or substantially lessened to a level of less than significant by incorporation of Project-level mitigation measures MM 10-1 and MM 10-2 (Draft EIR page 4.10-28) into the Project.

**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.

**5.2.8 NOISE**

**Substantial Temporary Increase in Ambient Noise Levels (Construction Sources).** As identified in Section 4.12, Noise, of the Draft EIR, even with implementation of PVCCSP EIR mitigation measures MM Noise-1 through MM Noise-4, the Project's construction noise levels are anticipated to exceed the City's noise level thresholds absent mitigation. As such, the Project Applicant would incorporate Project-level mitigation measure MM 12-1, which requires a minimum 100-foot buffer zone separating large construction equipment (e.g., dozers, graders, scrapers, etc.) from receiver locations R2 (Morgan Park) and R7 (residential property south of Rider Street). 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.

**Cumulative Impacts.** As identified above, 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.

**Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** Potential impacts related to substantial temporary increases in ambient noise levels during Project construction have been eliminated or substantially lessened to a level of less than significant by incorporation of PVCCSP EIR mitigation measures MM Noise 1 through MM Noise 4 (Draft EIR page 4.12-13) and Project-level mitigation measure MM 12-1 (Draft EIR page 4.12-28) into the Project.

**Applicable PVCCSP EIR 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, 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.

**Additional Project-Level Mitigation Measures**

- 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).

**Located within the Vicinity of a Private Airstrip or an Airport Land Use Plan or within Two Miles of a Public Airport or Public Use Airport and Would Expose People to Excessive Noise Levels.** As discussed in Section 4.12, Noise, of the Draft EIR, 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. 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. 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. 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 impact 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 MARB/IPA AIA (refer to mitigation measure MM Haz 4 in Section 5.2.6, Hazards and Hazardous Materials, above).

### **Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** Potential impacts related to excessive noise levels due to air travel have been eliminated or substantially lessened to a level of less than significant by incorporation of PVCCSP EIR mitigation measures MM Haz 4 (Draft EIR page 4.9-11 and 4.9-12) into the Project.

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

See mitigation measure MM HAZ 4 in Section 5.2.6, Hazards and Hazardous Materials.

## **5.2.9 TRANSPORTATION**

**Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System, Including Transit, Roadway Bicycle, and Pedestrian Facilities.** As presented in Table 4.11-1, SCAG Policy Consistency Analysis, in EIR Section 4.11, Land Use and Planning, implementation of the Project would be consistent with the goals and policies of SCAG's regional planning programs (SCAG's 2016 RTP/SCS and Connect SoCal), including the goals related to vehicular and non-vehicular circulation, and good movement. Further, as identified in Section 4.13, Transportation, of the Draft EIR, the Project, which incorporates applicable PVCCSP EIR mitigation measures addressing transportation, would not result in any conflicts with any City General Plan policies that address the circulation system, including goals and policies outlined in the Circulation Element, Conservation Element, and Open Space Element. Notably, mitigation measure MM Trans 3 requires payment of traffic fees; mitigation measure MM Trans 4, requires coordination with the Riverside Transit Authority (RTA) regarding bus stops; mitigation measure MM Trans 5 requires accommodations for bicycles; and, mitigation measure MM Trans 6 requires trail improvements along the Metropolitan property. Moreover, the Project Applicant would develop the Project in accordance with the PVCCSP Standards and Guidelines that pertain to on-site and off-site roadway improvements, vehicular and non-vehicular circulation, and site access as outlined in PVCCSP EIR mitigation measure MM Trans 1, and project design features PDF 13-1 through PDF 13-3. As required by PVCCSP EIR mitigation measure MM Trans 8, required

improvements would be coordinated with the NPRBBD to ensure that they are in conformance with the ultimate improvements planned by the NPRBBD. As such, the Project would not result in conflicts with regional, or local programs, plans, ordinances, or policies addressing the circulation system and impacts would be less than significant.

The Riverside County Transportation Commission (RCTC) monitors the Congestion Management Plan (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 Draft EIR concludes that the Project would not conflict with the RCTC CMP.

### **Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project, which avoids or substantially lessens the significant environmental effect as identified in the EIR.**
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** Potential impacts related to conflict with a program, plan, ordinance, or policy addressing the circulation system have been eliminated or substantially lessened to a level of less than significant by incorporation of PVCCSP EIR mitigation measures MM Trans 1 (Draft EIR page 4.13-16), MM Trans 3 through MM Trans 6 (Draft EIR pages 4.13-16 and 4.13-17, and MM Trans 8 (Draft EIR page 4.13-17), and project design features PDF 13-1 through PDF 13-3 (Draft EIR pages 4.13-17 through 4.13-20) into the Project.

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

- 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 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**

**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 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.

**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 Project shall improve these roadways as required by the final Conditions of Approval for the 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.

### 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.

**Substantially Increase Hazards Due to a Geometric Design Feature.** As discussed in Section 4.13, Transportation, of the Draft EIR, 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. The Project would implement site-adjacent roadway improvements and Project driveways along Morgan Street, Rider Street and Sinclair Street, and driveways along Redlands Avenue (refer to project design features PDF 13-1 through PDF 13-3). 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 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. The Project Applicant would implement PVCCSP EIR mitigation measure MM Air-2, which requires that a traffic control



plan be provided to the City. With the implementation of PVCCSP EIR mitigation measure MM Air-2, the Project would have a less than significant impact during construction associated with increased hazards.

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 and MM Trans 2. Roadway improvements in and around the Project area would be designed and constructed to satisfy applicable requirements for street widths, corner radii, and intersection control. They would also incorporate design standards tailored specifically to Project access requirements. Additionally, the Project's roadway improvements would be designed in accordance with the County's Standard No. 821, which addresses intersection corner sign distance. Adherence to applicable City requirements would ensure the 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.

### **Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project, which avoids or substantially lessens the significant environmental effect as identified in the EIR.**
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** Potential impacts related to traffic hazards due to a geometric design feature or incompatible uses have been eliminated or substantially lessened to a level of less than significant by incorporation of PVCCSP EIR mitigation measures MM Air 2 (Draft EIR page 4.3-22), MM Trans 1 through MM Trans 6, and MM Trans 8 (Draft EIR pages 4.13-16 and 4.13-17), and project design features PDF 13-1 through PDF 13-3 (Draft EIR pages 4.13-17 through 4.13-20) into the Project.

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

Refer to MM Air 2 in Section 5.2.2, Air Quality, mitigation measures MM Trans 1 and MM Trans 2, above.

### **Project Design Features**

Refer to project design features PDF 13-1 through PDF 13-3, above.

**Inadequate Emergency Access.** As discussed in Section 4.13, Transportation, of the Draft EIR, 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 PVCCSP EIR mitigation measure MM Air 2 in Section 5.2.2, Air Quality, which requires that a traffic control plan be provided to the City). Further, 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 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, as discussed previously, 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. 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.

### **Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project, which avoids or substantially lessens the significant environmental effect as identified in the EIR.**
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** Potential impacts related to inadequate emergency access have been eliminated or substantially lessened to a level of less than significant by incorporation of PVCCSP EIR mitigation measures MM Air 2 (Draft EIR page 4.3-22), MM Trans 1 and MM Trans 2 (Draft EIR page 4.13-16), and project design features PDF 13-1 through PDF 13-3 (Draft EIR pages 4.13-17 through 4.13-20) into the Project.

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

Refer to MM Air 2 in Section 5.2.2, Air Quality, mitigation measures MM Trans 1 and MM Trans 2, above.

### **Project Design Features**

Refer to project design features PDF 13-1 through PDF 13-3, above.

**Cumulative Impacts.** With implementation of applicable PVCCSP EIR mitigation measures, and project design features identified previously, 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.

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.

**Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project, which avoids or substantially lessens the significant environmental effect as identified in the EIR.**
  
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** Potential impacts related to cumulative impacts have been eliminated or substantially lessened to a level of less than significant by incorporation of PVCCSP EIR mitigation measure mitigation measures MM Air 2 (Draft EIR page 4.3-22), MM Trans 1 through MM Trans 6, and MM Trans 8 (Draft EIR pages 4.13-16 and 4.13-17), and project design features PDF 13-1 through PDF 13-3 (Draft EIR pages 4.13-17 through 4.13-20) into the Project.

**Applicable PVCCSP EIR Mitigation Measures**

Refer to MM Air 2 in Section 5.2.2, Air Quality; and mitigation measures MM Trans 1 through MM Trans 6, and MM Trans 8, above.

**Project Design Features**

Refer to project design features PDF 13-1 through PDF 13-3, above.

**5.2.10 TRIBAL CULTURAL RESOURCES**

**Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource.** 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. Without mitigation, construction activities including excavation could encounter unknown tribal cultural resources resulting in a potentially significant impact. Mitigation measure MM 5-1 (presented in Section 5.2.4, Cultural Resources), 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 (presented in Section 5.2.4, Cultural Resources) 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.

**Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid**

**or substantially lessen the significant environmental effect as identified in the Final EIR.**

**2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The potential impacts to tribal cultural resources have been eliminated or substantially lessened to a level of less than significant by implementation of Project-level mitigation measure MM 5-1 (Draft EIR pages 4.5-14 through 4.5-16), and MM 5-2 (Draft EIR pages 4.5-16 and 4.5-17).

**Additional Project-Level Mitigation Measures**

Refer to Project-level mitigation measures MM 5-1 and MM 5-2 in Section 5.2.4, Cultural Resources.

**Cumulative Impacts.** 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. 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.

**Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**
- 2. The effects identified in the EIR have been determined not to be significant.**

**Facts in Support of Findings:** The potential cumulative impacts to tribal cultural resources have been eliminated or substantially lessened to a level of less than significant by implementation of Project-level mitigation measure MM 5-1 (Draft EIR pages 4.5-14 through 4.5-16), and MM 5-2 (Draft EIR pages 4.5-16 and 4.5-17).

**Additional Project-Level Mitigation Measures**

Refer to Project-level mitigation measures MM 5-1 and MM 5-2 in Section 5.2.4, Cultural Resources.

### 5.3 **ENVIRONMENTAL EFFECTS WHICH REMAIN SIGNIFICANT AND UNAVOIDABLE AFTER MITIGATION AND FINDINGS**

The purpose of this section is to present the Findings and Facts in the Support of Findings relative to those Project impacts that cannot be reduced to a level considered less than significant with the incorporation of PVCCSP EIR mitigation measures into the Project, and implementation of Project-specific project design features, and/or additional Project-level mitigation measures.

The City of Perris, having reviewed and considered the information contained in the Final EIR, Technical Appendices and the administrative record, finds, pursuant to California Public Resources Code 21081 and CEQA Guidelines 15091, that:

- Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can or should be adopted by such other agency.
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

Therefore, the Project would cause significant unavoidable impacts for the following categories. The City must adopt a Statement of Overriding Consideration as a condition of Project approval and identify overriding economic, legal, social, technological, or other benefits of the Project that outweigh the significant effects of the Project (refer to Section 7.0 of this document).

- **Air Quality.** Cumulatively considerable net increase of a criteria pollutant for which the Project region is non-attainment (NOx, which is an ozone [O<sub>3</sub>] precursor).
- **Greenhouse Gas Emissions.** Substantial cumulative generation of greenhouse gas emissions.
- **Noise.** Substantial permanent or temporary increase in ambient noise (Project and cumulative off-site traffic noise)

#### 5.3.1 AIR QUALITY

**Result in a Cumulatively Considerable Net Increase of Any Criteria Pollutant for Which the Project Region is Nonattainment (Construction and Operation).** As discussed in Section 4.3, Air Quality of the Draft EIR, and shown in Table 4.3-3, Attainment Status of Criteria Pollutants in the SoCAB, the CAAQS designate the Project area as nonattainment for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, while the NAAQS designates the Project area as nonattainment for O<sub>3</sub> and PM<sub>2.5</sub>. In compliance with PVCCSP EIR mitigation measure MM Air 1 and MM Air 10, a Project-specific air quality analysis was conducted to determine the potential air quality impacts resulting from the Project during construction and operation of the Project.

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, including mitigation measures MM Air 2 (traffic control plans), MM Air 3 (compliance with SCAQMD Rule 403), MM Air 4 (limits idling of

construction equipment on site to no more than five minutes), MM Air 5 (use of electricity from power poles), MM Air 7 (construction equipment maintenance), MM Air 8 (paint application equipment restrictions), and MM Air 9 (use of low VOC paints). 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 of the Draft EIR, for the construction scenarios with construction of the Rider Street bridge in one-stage and two-stages, respectively. Additional Project-level mitigation measures MM 3-15 (requires use of Tier 3 and Tier 4 equipment and replaces PVCCSP EIR MM Air 6) and MM 3-16 (requires use of electric hookups for electric construction tools), would be incorporated into the Project and identify measures to further reduce construction-related air quality emissions, notably NO<sub>x</sub>. After implementation of applicable PVCCSP EIR mitigation measures and Project-level mitigation measures, emissions resulting from the Project construction would still exceed thresholds established by the SCAQMD for emissions of NO<sub>x</sub>, which is a precursor to O<sub>3</sub>. Therefore, the Project would result in a significant and unavoidable cumulatively considerable net increase of a criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard.

Vehicular trips associated with the PVSD Channel and Rider Street bridge would be generated by motor vehicles traveling to and from these facility during periodic maintenance, which occurs under existing conditions. Additionally, these Project components do not involve any buildings and therefore no permanent source or area stationary source emissions. Therefore, there is no significant operational emissions in regard to PVSD Channel improvements, including the Rider Street bridge.

Project operation would be required to comply with 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 13 (which promotes the use of “clean” truck fleets), mitigation measure MM Air 14 (which requires parking to accommodate ride-sharing vehicles), and MM Air 20 (which sets performance standards on energy and water usage). 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 taken in the estimate of emissions, leading to an overstatement of impacts. As shown on Table 4.3-9, Summary of Peak Operational Emission, maximum daily emissions from Project operations would exceed the SCAQMD CEQA significance thresholds for NO<sub>x</sub>, which is an O<sub>3</sub> precursor. The SoCAB is in nonattainment for O<sub>3</sub>. Over 95 percent of operational-source NO<sub>x</sub> emissions would be generated from the mobile activities. Therefore, the Project would result in a 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, resulting in a significant Project and cumulative impact. Additional Project-level mitigation measures MM 3-1 through MM 3-14, would be incorporated into the Project and identify measures to further reduce air quality emissions, notably NO<sub>x</sub>. However, even with implementation of these mitigation measures, this impact would be significant and unavoidable.

Emissions for other pollutants would not exceed the SCAQMD thresholds. Further, the Project’s emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level.

### **Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project that avoid or substantially lessen the significant environmental effect as identified in the EIR.**
- 2. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.**
- 3. Impacts associated with construction-related and operational air quality emissions from implementation of the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project have been reduced to the extent feasible. However, after implementation of mitigation measures contained in the EIR, the impacts would constitute a significant and unavoidable impact.**

**Facts in Support of Findings:** Maximum daily emissions from Project construction would exceed the SCAQMD CEQA mass daily significance thresholds for NO<sub>x</sub>. The NO<sub>x</sub> 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). Even with incorporation of PVCCSP EIR mitigation measures MM Air 2, MM Air 3, MM Air 4, MM Air 5, MM Air 7, MM Air 8, and MM Air 9, and additional Project-level mitigation measures MM 3-15 and MM 3-16 (Draft EIR pages 4.3-31 through 4.3-33), construction-related NO<sub>x</sub> emissions cannot be effectively reduced to a level below SCAQMD thresholds. 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<sub>x</sub> emissions to levels that are less than significant. Further, while construction-related emissions could be reduced to less than significant levels by restricting the amount of heavy-duty construction vehicles operating on a daily basis, this would, in turn, increase the length of time that nearby receptors such as residents would be exposed to other construction-related effects of the project such as fugitive dust and noise. Thus, NO<sub>x</sub> emissions during construction are considered significant and unavoidable, consistent with the conclusions of the PVCCSP EIR.

Maximum daily emissions from Project operations would exceed the SCAQMD CEQA mass daily significance thresholds for NO<sub>x</sub>. This exceedance is primarily due to the extensive haul truck travel resulting from operations. The EIR analysis utilized a conservative average truck trip length of 60 miles rather than the default trip length of 16.6 miles that the SCAQMD identifies for non-residential land uses within Riverside County. Because NO<sub>x</sub> is an O<sub>3</sub> precursor, this could result in increased violations to the State and federal O<sub>3</sub> standards. Even with incorporation of PVCCSP EIR mitigation measures MM Air 11, MM Air 13, MM Air 14, and MM Air 20 (Draft EIR pages 4.3-24 and 4.3-25), and additional Project-level mitigation measures MM 3-1 through MM 3-14 (Draft EIR pages 4.3-31 through 4.3-33), NO<sub>x</sub> emissions cannot be effectively reduced to a level below SCAQMD thresholds. The magnitude of NO<sub>x</sub> reductions from mitigation measures MM 3-1 through MM 3-14 would be relatively small because most of the operational emissions would be generated by long-haul diesel trucks while on the road. The trucks would not be owned by the Project proponent or warehouse operators; thus, near-term mitigation of truck emissions is not feasible. The amount of NO<sub>x</sub> reductions resulting from implementation of mitigation measures would not reduce Project emissions to the 55 lbs/day threshold of significance. 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. Therefore, even with implementation of the identified mitigation measures, this impact would be significant and unavoidable, consistent with the conclusions of the PVCCSP EIR.

The City of Perris understands that the SCAQMD CEQA mass daily thresholds of significance are specific values that apply to all general development projects regardless of size. For example, these thresholds are used for projects as small as a single-family home all the way to the overall development allowed under a specific plan such as the PVCCSP. This can give the impression that large projects are “bad” because they generate emissions that exceed one or more mass daily thresholds while smaller projects are “good” because their emissions do not exceed any of the mass daily thresholds. The Project is proposed to comply with the existing land use designations and development standards for the Project area. The Project does not allow for any additional development that exceeds the standards for the Project area. As such, the Project does not generate greater emissions on a square-foot basis than other light industrial projects in Perris that are smaller in overall size and do not exceed the SCAQMD mass daily CEQA thresholds of significance.

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

Refer to mitigation measures MM Air 3, MM Air 6, and MM Air 9 in Section in Section 5.2.2, Air Quality.

**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 was completed with preparation of the Draft EIR.***

**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. ***This mitigation measure was completed with preparation of the Draft EIR.***

**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 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.

### **Additional Project-Level Mitigation Measures**

The following additional mitigation measures are required to reduce operational emissions of NOx from area and mobile sources.

**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.

**MM 3-15** Prior to grading permit issuance, the City of Perris Planning Division and City of Perris Engineering Division shall review and approve a construction management plan. The construction management plan also shall include the following notes. Project contractors shall be required to comply with these notes and permit periodic inspection of the construction site by City of Perris staff to confirm compliance.

During construction activity, all off-road construction equipment with more than 50 horsepower shall be California Air Resources Board (CARB) Tier 3 Compliant or better.

If Tier 4 Final Compliant equipment can be reasonably and feasibly acquired by the Project grading contractor, Tier 4 Final Compliant equipment shall be used in lieu of Tier 3 Compliant or Tier 4 Interim Compliant equipment. If Tier 4 Final Compliant equipment is not economical to use during grading activity due to lack of local availability of such equipment, the Project Applicant or contractor(s) shall provide evidence to the City of Perris showing that the contractor(s) attempted to secure the use of Tier 4 Final Compliant equipment, but such equipment was not locally available (within a 50-mile radius). or was uneconomical to use due to a lack of supply of such equipment. All Tier 3 Compliant and Tier 4 Interim Compliant equipment over 50 horsepower, if used, shall be fitted with Best Available Control Technology (BACT) devices, if technically feasible and if the BACT devices can be reasonably acquired by the Project grading contractor, to minimize air pollutant emissions.

The contractor(s) shall keep a copy of each unit's certified tier specification and California Air Resources Board (CARB) on the Project Site in a location available to the City or City designee for inspection upon request. The City shall review and approve the list of equipment over 50 horsepower, their CARB tier levels, and list of BACT devices installed on Tier 3 Compliant and Tier 4 Interim Compliant equipment, prior to the mobilization of equipment to the site.

**MM 3-16** During construction activity, electrical hook ups to the power grid for electric construction tools, such as saws, drills and compressors, and using electric tools shall be provided where feasible.

### **5.3.2 GREENHOUSE GAS EMISSIONS**

**Substantial Greenhouse Gas Emissions.** As identified in Section 4.8, Greenhouse Gas Emissions, of the Draft EIR, construction activities would result in the temporary generation of GHGs from off-road and on-road construction equipment and worker vehicles. As shown on Table 4.8-4, Amortized Annual Construction Emissions, of the Draft EIR, the total annual estimated construction GHG emissions for the Project, including amortized construction-related GHG emissions, is 126.59 MTCO<sub>2</sub>e/yr when construction of the Project entails a one stage bridge construction and 138.02 MTCO<sub>2</sub>e/yr when construction of the Project entails a 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.

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. Project operation would be required to comply with the mitigation measures from the PVCCSP EIR identified in Section 4.3, Air Quality, of the Draft EIR, and presented in Section 5.3.1, above. Specifically, the Project would be required to comply with PVCCSP EIR 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). Due to uncertainties associated with these mitigation measures and the limitations of the emissions model, these emissions reductions are not quantified as part of the analysis. As such, the emissions calculations presented in the Draft EIR represent a conservative estimate. During Project operation, the Project is calculated to emit 13,440.86 MTCO<sub>2</sub>e per year and 13,452.29 MTCO<sub>2</sub>e per year, when taking into consideration the one stage and two stage bridge construction scenarios. Project emissions of GHGs would exceed the SCAQMD threshold of 10,000 MTCO<sub>2</sub>e. 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 3-16). 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.

**Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project that avoids or substantially lessens the significant environmental effect as identified in the EIR.**
- 2. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.**
- 3. Cumulative GHG impacts from implementation of the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project have been reduced to the extent feasible. However, the impacts would constitute a significant and unavoidable impact.**

**Facts in Support of Findings:** There are no additional feasible mitigation measures that would reduce the Project’s cumulative impacts related to GHG emissions to a less than significant level. Therefore, the Project would still result in significant and unavoidable cumulative impacts related to GHG emissions.

The City of Perris understands that the SCAQMD CEQA thresholds of significance are specific values that apply to all general development projects regardless of size. For example, these thresholds are used for projects as small as a single-family home all the way to the overall development allowed under a specific plan such as the PVCCSP. This can give the impression that large projects are “bad” because they generate emissions that exceed the SCAQMD thresholds while smaller projects are “good” because their emissions do not exceed the thresholds. The Project is proposed to comply with the existing land use designations and development standards for the Project area. The Project does not allow for any additional development that exceeds the standards for the Project area. As such, the Project does not generate greater emissions on a square-foot basis than other light industrial projects in Perris that are smaller in overall size and do not exceed the SCAQMD thresholds of significance.

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

Refer to PVCCSP EIR mitigation measures MM Air 11, MM Air 13, and MM Air 14, in Section 5.3.1.

**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.

### **Additional Project-Level Mitigation Measures**

No additional mitigation measures beyond Project-level mitigation measures MM 3-1 through 3-16 in Section 5.3.1 of this document are available to further reduce the significant cumulative GHG emissions impact.

### **5.3.3 NOISE**

**Substantial Permanent Increase in Ambient Noise Level (Off-site Traffic Noise).** As identified in Section 4.12, Noise, of the Draft EIR, 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, it is anticipated that Project traffic would also utilize the new interchange to access I-215. To provide a conservative analysis, the analyses 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.

As shown in Table 4.12-9, Existing Conditions with Project Traffic Noise Impacts (Harley Knox Interchange), the Project is anticipated to generate off-site traffic noise level increases ranging from 0.0 dBA CNEL to up to 8.4 dBA CNEL under Existing and Existing with Project conditions when considering trucks using the I-215/Harley Knox Boulevard 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, 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. The existing non-conforming, existing noise-sensitive uses along this segment (Harley Knox Boulevard east of Perris Boulevard-Segment 15) include 3 existing residences that do not conform to the underlying industrial land use designation of the PVCCSP and City of Perris Zoning Map. Therefore, these residences are considered an existing non-conforming use. Additionally, as shown on Table 4.12-10, Existing Conditions with Project Traffic Noise Impacts (Placentia Interchange), the Project is anticipated to generate existing off-site traffic noise level increases ranging from 0.0 dBA CNEL to up to 9.2 dBA CNEL, when considering trucks using the I-215/Placentia Avenue interchange. 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. The non-conforming, existing noise-sensitive uses (non-conforming residences) along this segment (Indian Avenue south of Rider Street - Segment 2) include 7 existing residences that 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.

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. The Project Applicant also considered the incorporation of off-site noise barriers to reduce impacts. Both forms of mitigation would reduce noise impacts; however, neither form of mitigation would minimize this impact to a level of insignificance and thus the mitigation is not proposed. As such, the Project's off-site traffic noise impacts would remain significant and unavoidable with the incorporation of mitigation.

**Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project that avoids or substantially lessens the significant environmental effect as identified in the EIR.**
- 2. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.**
- 3. Impacts associated with off-site traffic noise levels from implementation of the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project have been reduced to the extent feasible. There is no feasible mitigation to reduce these impacts to a less than significant level; therefore, the impacts would constitute a significant and unavoidable impact.**

**Facts in Support of Findings:** As discussed in Section 4.12, Noise, of the Draft EIR, and presented below, there are no feasible mitigation measures available that would reduce the Project's traffic-related noise impacts to less than significant levels. Therefore, the Project would still result in significant and unavoidable impacts related to off-site traffic noise levels.

- **Rubberized Asphalt.** Due to the potential noise attenuation benefits, rubberized asphalt was 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 with 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.

**Cumulative Impacts (Off-site Traffic Noise).** With respect to traffic-related noise impacts, Table 7-5 of the Project's Noise Analysis included in Appendix K of the 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 established noise impact criteria, 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.

**Findings:**

- 1. Changes or alterations have been required in, or incorporated into, the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project that avoids or substantially lessens the significant environmental effect as identified in the EIR.**
- 2. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.**
- 4. Impacts associated with cumulative off-site traffic noise levels from implementation of the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project have been reduced to the extent feasible. There is no feasible mitigation to reduce these impacts to a less than significant level; therefore, the impacts would constitute a significant and unavoidable cumulative impact.**

**Facts in Support of Findings:** As discussed in Section 4.12, Noise, of the Draft EIR, and presented above, there are no feasible mitigation measures available that would reduce the Project's traffic-related noise impacts to less than significant levels. Therefore, the Project would result in significant and unavoidable impacts related to cumulative off-site traffic noise levels.

**5.4 ALTERNATIVES TO THE PROPOSED PROJECT**

The Draft EIR addresses the environmental effects of alternatives to the Project. A description of these alternatives, a comparison of their environmental impacts to the Project, and the City's findings are listed below. These alternatives are compared against the Project relative to the identified Project impacts summarized in Section 5.2 and Section 5.3 and to the Project objectives, as stated in Section 2.3 of this document. The Reduced Intensity, Reduced Development Area, and Alternate PVCCSP Use alternatives are each environmentally superior to the Project. 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.

In making the following alternatives findings, the City of Perris certifies that it has independently reviewed and considered the information on alternatives provided in the Draft EIR, including the information provided in the comments on the Draft EIR and the responses thereto.

#### **5.4.1 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT 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.

##### **Findings:**

- 1. The findings of the Project set forth in this document and the overriding social, economic and other issues set forth in the Statement of Overriding Considerations provide support for the Project and the elimination of this alternative from further consideration.**

**Facts in Support of Findings:** The No Project/No Development Alternative is addressed in the Draft EIR (pages 5-9 through 5-13; and page 5-40, Table 5-2, Comparison of Alternatives to the Proposed Project). As identified, 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 and would not improve flooding conditions by containing the 100-year flood within the PVSD Channel, which would occur with the Project.

Further, 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 site for Light Industrial and Public/Semi-Public Facilities/Utilities uses. 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 and Public/Semi-Public Facilities/Utilities uses. 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 greater than the Project related to consistency with planning programs.

The No Project/No Development Alternative would not involve any development within the Project area. This alternative would not attain any of the Project Objectives identified above in Section 2.3 of this document, including implementation of the PVCCSP and the City’s General Plan goals and policies relevant to the Project area and proposed industrial development (Draft EIR, page 5-13).

## 5.4.2 ALTERNATIVE 2: REDUCED INTENSITY 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.

### Findings:

- 1. The findings of the Project set forth in this document and the overriding social, economic and other issues set forth in the Statement of Overriding Considerations provide support for the Project and the elimination of this alternative from further consideration.**

**Facts in Support of Findings:** The Reduced Intensity Alternative is addressed in the Draft EIR (pages 5-14 through 5-21, Table 5-2, Comparison of Alternatives to the Proposed Project). This alternative would reduce the building size by 25 percent. As such, there would be a related 25 percent reduction in average daily trip generation, including truck trips. The Reduced Intensity Alternative would result in a net reduction in ADT compared to the Project (approximately 1,445 ADT compared to 1,926 ADT with the Project). 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 construction-related air quality impacts, the construction activities for this alternative would be similar to the Project and would also be significant and unavoidable.

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. Additionally, despite the reduction in building size, operational regional emissions generated under this alternative would exceed the SCAQMD CEQA significance threshold for NO<sub>x</sub> as with the Project. As with the Project, even with implementation of mitigation measures identified in Section 4.3, Air Quality, the amount of NO<sub>x</sub> emissions reduction would not reduce emissions to below the 55 lbs/day threshold of significance. Long-term operational emissions of NO<sub>x</sub> (an ozone precursor) resulting from the Reduced Intensity Alternative would be cumulatively considerable for O<sub>3</sub>—which is a nonattainment pollutant—resulting in a significant cumulative impact.

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

MTCO<sub>2</sub>e/yr screening threshold and the impact would be cumulatively significant and unavoidable, consistent with the Project.

The Reduced Intensity Alternative would generate fewer Project-generated trips than the Project. 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.

Similar or reduced impact levels would occur with this alternative compared to the Project for the remaining topical issues (Draft EIR, pages 5-14 through 5-21; page 5-40, Table 5-2, Comparison of Alternatives to the Project).

The Reduced Intensity Alternative would attain the Project objectives related to implementation of the PVCCSP, implementing the City's General Plan policies, taking advantage of the area's proximity to various freeways and existing and planned transportation corridors, phased and orderly development, and implementing PVSD Channel improvements anticipated in the PVCCSP. However, it would not attain to the same extent project objectives related to provision of jobs and economic development, and increased revenue for the City and would result in an underutilization of the development sites. This Alternative would not meet Project objectives associated with maximizing Class A speculative high cube warehouse industrial buildings in the Project area. (Draft EIR pages 5-20 and 5-21)

#### **5.4.3 ALTERNATIVE 3: REDUCED DEVELOPMENT AREA/ONE BUILDING ALTERNATIVE (RIDER 2 BUILDING)**

The Reduced Development Area/One Building Alternative (Rider 2 Building) is addressed in the Draft EIR (pages 5-21 through 5-29, Table 5-2, Comparison of Alternatives to the Proposed Project). 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 (an approximately 41 percent reduction); 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. 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 north of the Metropolitan property as that Project feature is associated with the Rider 4 building.

## **Findings:**

- 1. The findings of the Project set forth in this document and the overriding social, economic and other issues set forth in the Statement of Overriding Considerations provide support for the Project and the elimination of this alternative from further consideration.**

**Facts in Support of Findings:** Due to the 41 percent reduction in development area and building size with the Reduced Development 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.

Implementation of the Reduced Development Area Alternative would result in a reduced construction impacts area as compared to the Project and construction emissions would likely be reduced. However, the construction of the Rider 2 building would still overlap with the construction of the PVSD Channel improvements, including the Rider Street bridge. Under this alternative, the Project would still exceed the NO<sub>x</sub> emission thresholds. This alternative would reduce but not avoid the significant and unavoidable regional construction-related air quality impacts resulting from the Project.

As with the Project, operational regional emissions generated by the Reduced Development Area Alternative would exceed the SCAQMD CEQA significance threshold for NO<sub>x</sub> 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<sub>x</sub> 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<sub>x</sub> resulting from the Reduced Development Area Alternative would be cumulatively considerable for O<sub>3</sub> 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.

Total operational GHG emissions resulting from this alternative are estimated to be approximately 7,914 MTCO<sub>2</sub>e/yr (compared to 13,452.29 MTCO<sub>2</sub>e/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 MTCO<sub>2</sub>e/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.

Under this alternative, the development 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). Although this alternative would reduce the Project-generated trips and reduce the volume of daily truck trips, this alternative is not anticipated to result in a reduction of trips that would eliminate the significant and unavoidable off-site traffic-related noise impacts; the decrease in noise impacts is not considered to be substantial. Similar to the Project, this

alternative would result in Project and cumulative off-site traffic noise impacts that would be significant and unavoidable.

For all other topical areas, similar or reduced impact levels would occur with the Reduced Development Area compared to the Project (Draft EIR pages 5-22 through 5-28; page 5-40, Table 5-2, Comparison of Alternatives 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.

The Reduced Development Area would attain the Project objective related to taking advantage of the area's proximity to various freeways and existing and planned transportation corridors, phased and orderly development, and implementation of PVSD Channel improvements. However, it would not attain to the same extent project objectives related to implementation of the PVCCSP and General Plan goals and policies, provision of jobs and economic development, and increased revenue for the City and would result in an underutilization of the development sites. This Alternative would not meet Project objectives associated with maximizing Class A speculative high cube warehouse industrial buildings in the Project area. (Draft EIR pages 5-28 and 5-29)

#### **5.4.4 ALTERNATIVE 4: ALTERNATIVE USE COMPLIANT WITH THE PVCCSP ALTERNATIVE**

The Alternate Use Compliant with the PVCCSP (referred to herein as the Alternate PVCCSP Use Alternative) is addressed in the Draft EIR (pages 5-30 through 5-39, Table 5-2, Comparison of Alternatives to the Proposed Project). The purpose of 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. The trailer storage yard, as an accessory use to the Rider 2 building, is allowed by the PVCCSP. The accessory trailer yard would be in the western portion of the Rider 4 site along Redlands Avenue, and would accommodate approximately 320 trailer parking stalls (10 feet by 52 feet).

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.

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 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.

#### **Findings:**

- 1. The findings of the Project set forth in this document and the overriding social, economic and other issues set forth in the Statement of Overriding Considerations provide support for the Project and the elimination of this alternative from further consideration.**



**Facts in Support of Findings:** 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. The Project's significant and unavoidable cumulative impacts associated with construction and operational regional air quality impacts, cumulative GHG emission, and Project 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.

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. Under this alternative, the Project would still exceed the NO<sub>x</sub> emission thresholds. This alternative would reduce but not avoid the significant and unavoidable regional construction-related air quality impacts resulting from the Project. 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.

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. Under this Alternative, the Project would generate up to approximately 13,452 MTCO<sub>2</sub>e/yr of GHG emissions. However, because the majority of GHG emissions from the Project are from mobile sources, the reduction in ADT with this alternative would still exceed the SCAQMD's 10,000 MTCO<sub>2</sub>e/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.

This alternative would result in a net reduction in ADT as compared to the Project (approximately 1,528 ADT compared to 1,926 ADT) and would result in a decrease in average daily truck trips. As such, under this alternative, the Project's off-site noise impacts would be reduced. However, the reduction is not considered substantial and would not eliminate the Project's significant and unavoidable off-site traffic-related noise impacts.

For all other topical areas, similar or reduced impact levels would occur with the Alternate PVCCSP Use Alternative Area compared to the Project (Draft EIR pages 5-30 through 5-38; page 5-40, Table 5-2, Comparison of Alternatives to the Project).

The Alternate PVCCSP Use Alternative would attain the Project objective related to taking advantage of the area's proximity to various freeways and existing and planned transportation corridors, phased and orderly development, and implementation of PVSD Channel improvements. However, it would not attain to the same extent project objectives related to implementation of the PVCCSP and General Plan goals and policies, provision of jobs and economic development, and increased revenue for the City and would result in an underutilization of the development sites. This Alternative would not meet Project objectives associated with maximizing Class A speculative high cube warehouse industrial buildings in the Project area. (Draft EIR pages 5-38 and 5-39)

## **SECTION 6.0 CERTIFICATION OF THE FINAL EIR**

The City declares that no new significant information as defined by the CEQA Guidelines, Section 15088.5, has been received by the City after circulation of the Draft EIR that would require recirculation. The City certifies the Final EIR based on the findings and conclusions discussed below.

### **6.1 FINDINGS**

The Project would have the potential for creating significant adverse impacts. These significant adverse environmental impacts have been identified in the EIR and will require mitigation as set forth in the Findings. As described in Section 5.3 of this document, significant adverse impacts which cannot be mitigated to a level of insignificance after mitigation include: 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 (NO<sub>x</sub> emissions during construction and operation), cumulative GHG emissions, and off-site traffic noise impacts (Project and cumulative).

### **6.2 CONCLUSIONS**

1. Except as to those impacts stated above relating to air quality, GHG emissions, and noise, all other significant environmental impacts from the implementation of the Project have been identified in the EIR and, with implementation of the Project design features and mitigation measures identified, will be mitigated to a level considered less than significant.
2. Alternatives to the Project, which could potentially achieve the basic objectives of the Project, have been considered and rejected in favor of the Project.
3. Environmental, economic, social, and other considerations and benefits derived from the development of the Project override and make infeasible any alternatives to the Project or further mitigation measures beyond those incorporated into the Project.

## **SECTION 7.0 STATEMENT OF OVERRIDING CONSIDERATIONS**

### **7.1 INTRODUCTION**

The California Environmental Quality Act (CEQA) and the State CEQA Guidelines provide in part the following:

- a) CEQA requires that the decision maker balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve the Project. If the benefits of the proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”
- b) Where the decision of the public agency allows the occurrence of significant effects that are identified in the Final EIR but are not mitigated, the agency must state in writing the reasons to support its action based on the Final EIR and/or other information in the record. This statement may be necessary if the agency also makes the finding under Section 15091(a)(2) or 15091(a)(3) of the State CEQA Guidelines.
- c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the Project approval and should be mentioned in the Notice of Determination (Section 15093 of the State CEQA Guidelines).

The City, having reviewed and considered the information contained in the Final EIR for the Project, Responses to Comments and the public record, adopts the following Statement of Overriding Considerations that have been balanced against the unavoidable adverse impacts in reaching a decision on this Project.

### **7.2 SIGNIFICANT UNAVOIDABLE IMPACTS**

Although all potential Project impacts have been substantially avoided or mitigated as described in the preceding findings, there are no additional feasible mitigation measures for the following impacts. These impacts are considered significant and unavoidable.

- **Cumulatively Considerable Net Increase of a Criteria Pollutant.** Long-term NO<sub>x</sub> emissions from construction of the Project (including the PVSD Channel improvements and Rider Street bridge), and mobile sources during operation, would exceed established SCAQMD thresholds of significance. Because NO<sub>x</sub> is an ozone (O<sub>3</sub>) precursor, this could result in additional violations of the State and federal O<sub>3</sub> standards. O<sub>3</sub> is a nonattainment pollutant.
- **Cumulative Greenhouse Gas Emissions.** The Project’s GHG emissions would exceed the SCAQMD’s recommended 10,000 MTCO<sub>2</sub>e/yr screening threshold for industrial projects.
- **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.

Details of these significant unavoidable adverse impacts were discussed in the EIR and are summarized, or were otherwise provided in Section 5.3, Environmental Effects Which Remain Significant and Unavoidable after Mitigation and Findings, in this document.

### **7.3 OVERRIDING CONSIDERATIONS**

To the extent that the significant effects of the Project are not avoided or substantially lessened to below a level of significance, the City of Perris, having reviewed and considered the information contained in the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project EIR and the public record, and having balanced the benefits of the Project against the unavoidable effects which remain, finds that such unmitigated effects to be acceptable in view of the following overriding considerations. The City finds that any one of these Project benefits standing alone would be sufficient to sustain the Statement of Overriding Considerations.

- 1. The City of Perris finds that all feasible mitigation measures have been imposed to lessen Project impacts to less than significant levels. Furthermore, the City of Perris finds that alternatives to the Project are infeasible because, while they have similar or fewer environmental impacts, they do not provide the benefits of the Project, or they are otherwise socially or economically infeasible when compared to the Project, as described in the Statement of Facts and Findings.**

*With the exception of air quality, GHG emission, and noise impacts, based on the analysis presented in the Draft EIR, potential Project impacts are adequately reduced to less than significant levels through implementation of the identified PVCCSP mitigation measures, regulatory requirements, project design features, and additional Project-level mitigation measures developed for the Project.*

*The significant and unavoidable air quality impact resulting from the Project construction and operation is primarily associated with NOx emissions resulting from the Project's mobile sources (vehicular emissions). There is no feasible mitigation to reduce this impact to a less than significant level. This is further discussed in Response to Comment Letter F in the Final EIR. With the exception of the No Project Alternative, the Project alternatives would not avoid this air quality impact (refer to the discussion provided in Section 5.4). Elimination of this significant impact related to operations would require reducing the number of vehicle trips through a reduction in the size of the Project to a level that would result in a substantial underutilization of the development sites and would not meet the Project objectives.*

*The Project's significant and unavoidable cumulative GHG emissions impact is primarily associated with GHG emissions from mobile sources. Because the Project's GHG emissions exceed the SCAQMD's 10,000 MTCO<sub>2</sub>e/yr screening threshold, the impact would be cumulatively considerable and significant. There are no additional feasible mitigation measures that would reduce the Project's cumulative impacts related to GHG emissions to a less than significant level. The Reduced Development Area/One Building Alternative (Rider 2 Building) would eliminate this alternative, but would not meet the Project objectives to the same extent as the Project. Further, 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. The other Project alternatives would not avoid this impact.*

*The Project's significant and unavoidable Project impacts on sensitive noise receptors are due to off-site traffic noise. As discussed in Section 5.3.3 of this document, there is no*

*feasible mitigation to reduce these impacts to a less than significant level. With the exception of the No Project Alternative, the Project alternatives would not avoid this impact. Elimination of this significant impact would require reducing the number of vehicle trips (truck trips) through a reduction in the size of the Project to a level that would not meet the Project objectives.*

- 2. The IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project is consistent with and will contribute to achieving the goals and objectives established by the Perris General Plan and the Perris Valley Commerce Center Specific Plan. Implementing the City's General Plan as a policy is a legal and social prerogative of the City.**

*As noted in Section 2.2, Type of EIR, of the Draft EIR, the Project implements the approved PVCCSP within the Project area and does not propose any change to the site's existing land use designation or zoning. Table 4.8-B of the PVCCSP EIR addresses the consistency of the PVCCSP with the identified 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. Because the Project is consistent with, and implements the PVCCSP, it can be concluded that it is also consistent with the General Plan. Further, the Project is consistent with the intent of the PVCCSP "to provide high quality industrial, commercial, and office land uses to serve the existing and future residents and businesses of the City of Perris," and specifically with the land use designation of General Industrial. Therefore, the Project is also consistent with the General Plan land use designation (Specific Plan) for the Project area. Further, Table 4.11-2, City of Perris General Plan Consistency Analysis, of the Draft EIR, addresses the Project's consistency with the City's General Plan goals and policies. As identified through this consistency analysis, the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.*

- 3. The IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project will contribute towards maximizing employment opportunities in the City to improve the jobs-housing balance and to reduce unemployment within the City. Jobs for residents at a variety of income levels will be provided.**

*There are numerous methodologies for estimating employment generation from individual projects. 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. The Final EIR estimates the Project would generate approximately 1,313 new employment opportunities. This employment estimate is based on the employee generation rates used in the PVCCSP EIR which identifies an average employment generation factor of 1 employee per 1,030 square feet for Light Industrial floor space. The Economic Impact Study for the IDI Logistics Rider Logistics Project, City of Perris, CA, prepared by DTA (February 9, 2021) estimates the Project would generate 1,057 permanent jobs in the City of Perris (820 direct jobs at the proposed buildings and 237 off-site indirect/induced jobs); additional indirect/induced jobs would be created in the County. Despite the difference in potential employment generation based on varying methodologies, it is apparent that development of the Project would result in the creation of new jobs, which would be an increase over existing conditions where no employment opportunities currently exist. This increase in jobs would be an overall benefit to the local and regional economy, as discussed above under Item 4.*

Based on the most recent adopted housing and employment growth forecast data available from the Southern California Association of Governments (SCAG)<sup>3</sup>, the estimated 2016 jobs-to-housing ratio for the City of Perris was 0.94 (16,100 jobs / 17,200 households). In 2045, the estimated future jobs-to-housing ratios for the City is 0.78 (26,400 jobs / 33,800 households = 0.78). The jobs-to-housing ratio refers to the ratio of residents and jobs in an area. Because these ratios are below 1.0, they indicate that the City of Perris is “jobs poor.” Therefore, the provision of additional jobs by maximizing employment in the Project area would support a better jobs-to-housing ratio and would reduce unemployment in the City.

New jobs associated with the Project are expected to include both manual occupations (e.g., trucking, dock work, and freight handling) and other office-based occupations (e.g., logistics, sales, management, and freight forwarding). Both manual and office-based occupations have the potential to pay relatively high wages, thereby contributing to the provision of jobs for a variety of income levels. Additionally, as discussed below, the Project would generate short-term construction-related and long-term operational jobs.

- 4. Development and construction of the IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project will create both temporary and permanent on-site jobs and will indirectly support local and regional jobs. Additionally, construction spending will create a one-time stimulus to the local and regional economies. Once the Project is completed, the Rider 2 and Rider 4 buildings will ultimately spur the creation of both local and regional jobs, and there would be additional output and earnings to the local and regional economies.**

Temporary construction and long-term operational jobs created by the Project would result in increased spending throughout the region, including in the City of Perris. It is anticipated that annual personal earnings would increase through the generation of new jobs, and these earnings would ripple through the local and regional economy, creating a one-time increase in output and earnings associated with construction jobs and an on-going increase in output and earnings associated with permanent jobs. Employment generation associated with operation of the proposed buildings is discussed under Item 3, above. With respect to construction jobs, the Economic Impact Study prepared for the Project (DTA, 2021) estimates that during construction there would be 585 one-time construction jobs in the City. The estimated economic benefits associated with the creation of jobs are listed below.

- 5. The IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project will provide new development that will assist the City in obtaining fiscal balance in the years and decades ahead. Once construction is completed, the facility will annually generate additional City revenue. This increased revenue from the development will be driven by indirect sales tax, property tax, and business license fees.**

The Project would have a positive fiscal impact on the City of Perris through construction and development of the Project, as well as throughout the life of the Project. The construction and development of the site would produce an economic stimulus as a result of the payment of one-time fees and recurring revenues. As previously identified, the fiscal impacts resulting from the Project are outlined in the Economic Impact Study prepared by

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<sup>3</sup> Southern California Association of Governments (SCAG). September (2020). Adopted Connect SoCal Demographics Growth Forecast Appendix. Available at [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_demographics-and-growth-forecast.pdf?1606001579](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579)

DTA (February 2021). While only recurring revenues and costs are analyzed in the Economic Impact Study, one-time fiscal and infrastructure benefits for the City are also estimated. An estimated total of \$2,678,033 in development impact fees and \$10,256,444 in North Perris Road and Bridge Benefit District Fees (NPRBBD Fees) are expected to be paid to the City with the development of the Project. These DIFs and NPRBBD Fees can be utilized by the City to fund a variety of Citywide infrastructure improvements that are included in its Capital Improvements Program. In addition, the Project includes the construction of PVSD Channel Improvements, as discussed further below. With respect to recurring revenue, the overall net fiscal impact to the City's General Fund resulting from the revenues anticipated to be generated by the Project's build-out, as compared with the cost of public services associated with the Project's build-out, will be an annual recurring fiscal surplus of \$115,076. Recurring revenue would include, but not be limited to property taxes, indirect sales tax, franchise fees, and licenses and permits. Recurring General Fund expenditures are primarily associated with police and fire services, and administrative and maintenance costs.

- 6. The IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project will help meet the existing demand for high-quality, large-scale, Class A high cube warehouse/distribution center within a geographic area that allows for access to a multi-modal transportation system.**

*The Project will help to fill southern California's unconstrained demand for warehousing space (demand without accounting for the amount of suitably zoned land for future development), which is estimated to be approximately 1.81 billion square feet by the year 2040, as projected by SCAG<sup>4</sup>. In doing so, the Project will further diversify the City's economy and secure the City's position in the regional, State, and international marketplace.*

- 7. The IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project will provide circulation improvements required to meet Project and local needs in an efficient and cost-effective manner.**

*The PVCCSP includes an Infrastructure Plan, which identifies the utility infrastructure necessary to serve the allowed development within 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 the Draft EIR.*

*Additionally, as described in Section 4.13, Transportation, of the Draft EIR, the Project would include various roadway improvements along Rider Street and Morgan Street to accommodate Project circulation needs. Improvements along Redlands Avenue would be limited to construction of sidewalk and other streetscape improvements since the eastern portion of Redlands Avenue was previously constructed (to the curb). These improvements would also provide a circulation benefit to other developments in the area. It should also be noted that the Project Applicant would be required to provide the City with a traffic control plan to minimize congestion and disruption to the Project area. The environmental impacts associated with these improvements have been evaluated in the*

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<sup>4</sup> SCAG. (April 2018). Southern California Association of Governments Industrial Warehousing Supply. Available at: [https://scag.ca.gov/sites/main/files/file-attachments/industrial\\_warehousing\\_report\\_-\\_revised\\_2018.pdf?1605989650](https://scag.ca.gov/sites/main/files/file-attachments/industrial_warehousing_report_-_revised_2018.pdf?1605989650)

*Draft EIR for the Project. In addition to the construction of roadways, and as discussed above, the Project developers would pay applicable traffic mitigation fees (e.g., NPRBBD Fees) that would fund additional traffic improvements to General Plan roadways in the Project area and would go toward the maintenance of roadway infrastructure in the Project area.*

*As shown in Figure 3.0-5 of the PVCCSP, a regional trail is planned along the PVSD Channel, 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. The Project includes the construction of a linear trail south of the Rider 4 site, north of the Metropolitan property, to accommodate pedestrian and bicycle travel between Redlands Avenue and the regional trail along the PVSD Channel (discussed under Item 8 below). 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.*

**8. The IDI Rider 2 & 4 High Cube Warehouses and PVSD Channel Improvement Project will provide regional drainage improvements minimizing the potential for upstream flooding of residences, streets, park, and athletic facilities.**

*As discussed in Section 3.2, Project Background, of the Draft EIR, 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. 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. 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.*

*As described in Section 3.6.2, PVSD Channel and Rider Street Bridge Improvements, the Project would implement improvements to the PVSD Channel consisting of 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. With implementation of the proposed PVSD Channel improvement the Rider 2 and Rider 4 sites and surrounding areas would be removed from the 100-year flood plain protecting these areas during a 100-year storm event.*

*Fifteen-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.*

Although significant impacts will remain, the City of Perris will mitigate any significant adverse impacts related to air quality, GHG emissions, and off-site traffic noise to the maximum extent



practicable. In its decision to approve the Project, the City of Perris has considered the Project benefits to outweigh the environmental impacts.