ALBERT A. WEBB ASSOCIATES

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1. INTRODUCTION

On August 31, 2010, the City of Perris ("City") certified an Environmental Impact Report (EIR) and approved the South Perris Industrial Project ("Original Project"), which involved the development of up to 7.4 million square feet of distribution warehousing uses on three non-contiguous sites, described in the EIR as Phase 1, Phase 2, and Phase 3. On June 9, 2020, the City Council approved Major Modification 19-05332 to the Original Project, and an addendum to the EIR (Addendum 20-0562 – "2020 Addendum") analyzing the impacts of the same. Specifically, the 2020 Addendum evaluated the development of the Phase 3 Site with either 2,869,677 total square feet of industrial uses over three buildings ("Plan A") or 2,358,347 square feet of industrial uses over 3 buildings, as well as a rail spur ("Plan B"). The applicant now proposes a second modification (Major Modification 20-05166) to Phase 3 of the Original Project. This document has been prepared to determine if the proposed modification would result in any new or increased significant impacts not analyzed in the certified EIR for the Original Project (or the 2020 Addendum). As set forth herein, it would not, and as a result, this addendum is the appropriate document for the City's consideration of the proposed modification under the California Environmental Quality Act (CEQA).

2. ORIGINAL PROJECT AND MAJOR MODIFICATION #1 APPROVALS

On July 13, 2010, the City approved the Original Project and certified the South Perris Industrial EIR, which disclosed and analyzed all of the Original Project's impacts on the environment pursuant to CEQA. The Original Project involves three non-contiguous sites, described in the EIR as Phase 1, Phase 2, and Phase 3, and allows 7.4 million square feet of distribution warehousing uses, in nine concrete tilt up buildings, to be constructed on a total of 458 acres. Specifically, the Original Project envisioned one 783,700 square foot warehouse building on 36 acres (Phase 1), four buildings totaling 3,443,892 square feet on 205 acres (Phase 2), and four buildings totaling 3,166,456 square feet on 217 acres (Phase 3). The Original Project assumed – and in fact required – that extensive offsite infrastructure improvements would be developed to facilitate the Original Project, as shown (in part) by the improvements required by the Development Agreements approved along with the Original Project. Accordingly, the EIR analyzed and covers all impacts from offsite improvements necessary to facilitate the envisioned industrial development.

The majority of land within the three project sites is vacant. The I-215 Freeway bounds the project area on the east and runs in a northwest to southeast direction. The Perris Valley Airport is located near the center of the project area adjacent to the Phase 1 site. South of the project area and adjacent to the Phase 2 site, the San Jacinto River runs in a northeast to southwest direction. The northernmost site is the Phase 3 site (the "Site"), which is bound by 7th Street to the north, Ellis Avenue to the south, Redlands Avenue to the west and the I-215 to the east.

The applicant has proposed an amendment to the previously approved development of the Phase 3 Site, which would reduce the total square footage permitted by the Original Project to 2, 840, 836 total square feet, thereby reducing the impacts already disclosed and analyzed in the previously certified EIR. The Original Project approvals specific to the Site, along with the certification of the EIR, were a General Plan Amendment, Specific Plan amendment and zone change (City Ordinance No. 1271), Development Agreement, DA 10-04-0010 (Document Number 2014-0092090), Tentative Parcel Map 35877, a Habitat Evaluation and Acquisition Negotiation Strategy (HANS) negotiation, and Development Plan Review 08-01-0007 (City Resolution No. 4326). Since the approval of the Original Project, there has not been development on the Site, but additional infrastructure in the area has been constructed, and the surrounding area has generally become more developed/urbanized.

On June 9, 2020, the City Council approved Major Modification 19-05332 to the Original Project, and the 2020 Addendum to the EIR analyzing the impacts of the same. Specifically, the 2020 Addendum concluded that development of the Phase 3 Site with either 2,869,677 total square feet of industrial uses over three buildings ("Plan A") or 2,358,347 square feet of industrial uses over 3 buildings, as well as a rail spur ("Plan B") would not result in any new or significant impacts on the environment not already analyzed in the EIR for the Original Project. While the City Council only approved the entitlements for Plan B, it approved the entire 2020 Addendum, and therefore found that its analysis of the potential impacts of Plan A complied with CEQA, and that analysis remains valid.

For all the same reasons as set forth in the 2020 Addendum, the proposed Project here will not result in any new or significant impacts not already analyzed in, and is fully covered by, the previously certified EIR for the Original Project. Like Major Modification 19-05332, the proposed Project would reduce the overall square footage of development allowed on the Site, and in fact, results in less square footage of development than the proposed Plan A analyzed in the 2020 Addendum. The analysis in the 2020 Addendum is hereby incorporated into this addendum by reference, as if fully set forth herein.

3. PROPOSED MAJOR MODIFICATION

The proposed modification to Phase 3 of the Original Project would allow the development of three tilt-up warehouse/industrial buildings on the same 217 acre Phase 3 Site, totaling 2,840,838 square feet (the "Project"), which is 325,618 square feet less development of the same uses than the Original Project would have allowed on the Site. In other words, the proposed Project would significantly reduce the square footage approved by the Original Project, which allowed four industrial buildings totaling 3,166,456 square feet, without changing the permitted uses. All three of the buildings will have a clear height of 42 feet. Specifically, and as shown in the site plan below (Figure 1), the three buildings would consist of the following square footages:

- Building 1: 990,657 square feet of warehouse, 30,000 square feet of office
- Building 2: 990,657 square feet of warehouse, 30,000 square feet of office
- Building 3: 799,522 square feet of warehouse

The Project also includes a rail access spur to serve the building located in the northeast portion of the Site, as was the case for the proposed Plan B project analyzed in the 2020 Addendum and

approved by the City Council on June 9, 2020 as Major Modification 19-05332. The proposed rail spur would extend over property located between Ellis Avenue and Case Road outside of the Original Project site, although impacts to this area were specifically analyzed in the 2020 Addendum, in addition to generally in the EIR for the Original Project. This area outside the Original Project site is, like the remainder of the Site, currently vacant and was previously disturbed by agricultural uses. The California Public Utilities Commission (CPUC) is the state agency with exclusive jurisdiction over review and approval of rail spur track design and construction in California. The Project will require a permit from CPUC, which will impose specific conditions related to the rail spur and rail crossing, including rail safety requirements and necessary offsite improvements. As concluded by the City Council when it approved the 2020 Addendum, the addition of the rail spur will not result in any new or increased significant impacts not already analyzed in, and fully covered by, the previously certified EIR for the Original Project.

The Project also includes a number of other offsite improvements as shown on Figure 2, including road improvements, including the Mapes Road driveway relocation, improvements to the Ellis Avenue/Case Road intersection and Ellis Avenue Railroad Crossing, Ellis Avenue drainage ditch construction and extension with a new outlet into the San Jacinto River, storm drain construction, construction of the Seventh Street channel trail, and the widening of the Case Road bridge over the San Jacinto River. These improvements are all generally consistent with the offsite improvements that the EIR assumed would be required as part of the development of the Original Project.

As described in more detail in Section 6.D (Biological Resources) herein, the rail spur and a number of offsite improvements require approvals from the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) Regional Conservation Authority ("RCA"), and some of the offsite improvements will require permits from resource agencies such as the United States Army Corps of Engineers ("USACOE"), Santa Ana Regional Water Quality Control Board ("RWQCB"), and/or the California Department of Fish and Wildlife ("CDFW"), as a result of impacts on jurisdictional waters. All applicable approvals from these agencies will be required prior to development of the relevant improvement. After implementation of all mitigation measures from the EIR and any additional conditions imposed on the Project by the foregoing public agencies as part of their respective approval processes, none of the offsite improvements, including the rail spur, would result in any new or increased significant impact when compared to the Original Project, and are therefore fully covered by the previously certified EIR.

The improvements to the Ellis Avenue Railroad Crossing will require the complete temporary closure to the Ellis Avenue railroad crossing. The railroad crossing improvements include street widening, reconstruction of raised median and channelized island, removal of existing gates, and new gates and flashers. Also, the Project is required to install an eight-inch recycle waterline in a 16-inch steel casing and a 24-inch waterline in a 44-inch street casing across the Ellis railroad crossing using the jack and bore method. The estimated time needed to complete utility work and railroad crossing improvement will be approximately four (4) months. As a result, Albert A. Webb & Associates conducted a detour analysis for both passenger cars and large trucks, and no significant impacts would occur to the operation of existing circulation. (Appendix 4, pp. 2-4.)

This confirms that the Project would not result in any new or increased significant impacts not already analyzed in the Original Project EIR.

LEGAL DESCRIPTION

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF PERRIS IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCEL A:

PARCEL 1: (APN: 310-170-026-8)

THAT PORTION OF THE SOUTHEAST QUARTER OF SECTION 32, TOWNSHIP 4 SOUTH, RANGE 3 WEST, SAN BERNARDINO COUNTY, CALIFORNIA, DESCRIBED AS FOLLOWS:

COMMENCING AT THE NORTHWEST CORNER OF SAID SOUTHEAST QUARTER, SAID CORNER BEING ON THE CENTER LINE OF REDLANDS AVENUE (FORMERLY KITCHING STREET), AS SHOWN BY RECORD OF SURVEY ON FILE IN BOOK 62 OF RECORD OF SURVEYS AT PAGES 41 AND 42 THEREOF, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA;

THENCE SOUTH 00° 10 39" EAST ALONG SAID CENTERLINE OF REDLANDS AVENUE, A DISTANCE OF 823.38 FEET;

NORTH 89° 49 21" EAST, A DISTANCE OF 44.00 FEET FOR THE TRUE POINT OF BEGINNING, SAID POINT BEING ON THE EAST RIGHT-OF-WAY LINE OF REDLANDS AVENUE CONVEYED TO THE COUNTY OF RIVERSIDE BY DEED RECORDED MAY 6, 1963 AS INSTRUMENT NO. 46411, OFFICIAL RECORDS OF RIVERSIDE COUNTY, CALIFORNIA;

THENCE NORTH 00° 10 39" WEST ALONG SAID EAST RIGHT-OF-WAY LINE, A DISTANCE OF 753.38 FEET TO THE SOUTHWEST CORNER OF PARCEL 4270-1 OF SAID RECORD OF SURVEY;

THENCE NORTH 89° 49 54 EAST ALONG THE SOUTH LINE OF SAID PARCEL 4270-2, A DISTANCE OF 973.37 FEET;

THENCE SOUTH 52° 05 32" WEST, A DISTANCE OF 1230.76 FEET TO THE TRUE POINT OF BEGINNING.

PARCEL 2: (APN: 310-170-057-4)

THAT PORTION OF THE SOUTHEAST QUARTER OF SECTION 32, TOWNSHIP 4 SOUTH, RANGE 3 WEST, SAN BERNARDINO COUNTY, CALIFORNIA, DESCRIBED AS FOLLOWS:

COMMENCING AT THE NORTHWEST CORNER OF SAID SOUTHEAST QUARTER, SAID CORNER BEING ON THE CENTER LINE OF REDLANDS AVENUE (FORMERLY KITCHING STREET), AS SHOWN BY RECORD OF SURVEY ON FILE IN BOOK 62 OF RECORD OF SURVEYS AT PAGES 41 AND 42 THEREOF, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA;

THENCE SOUTH 00° 10 39" EAST ALONG SAID CENTERLINE OF REDLANDS AVENUE, A DISTANCE OF 823.38 FEET;

THENCE NORTH 89° 49 21" EAST, A DISTANCE OF 44.00 FEET FOR THE TRUE POINT OF BEGINNING, SAID POINT BEING ON THE EAST RIGHT-OF-WAY LINE OF REDLANDS AVENUE CONVEYED TO THE COUNTY OF RIVERSIDE BY DEED RECORDED MAY 6, 1963 AS INSTRUMENT NO. 46411; OFFICIAL RECORDS OF RIVERSIDE COUNTY, CALIFORNIA;

THENCE SOUTH 00° 10 39" EAST ALONG SAID RIGHT-OF-WAY LINE, A DISTANCE OF 1816.45 FEET TO A POINT ON THE CENTERLINE OF ELLIS AVENUE (60.00 FEET IN WIDTH);

THENCE NORTH 89° 49 34" EAST ALONG SAID CENTER LINE, A DISTANCE OF 669.71 FEET;

THENCE NORTH 00° 10 26" WEST, A DISTANCE OF 64.00 FEET;

THENCE NORTH 52° 05 23" EAST, A DISTANCE OF 2409.79 FEET TO A POINT ON THE WEST RIGHT-OF-WAY LINE OF MARRIETA ROAD (80.00 FEET IN WIDTH);

THENCE NORTH 89° 42 28" EAST, A DISTANCE OF 20.03 FEET TO A POINT ON THE EAST LINE OF SAID SECTION 32, SAID POINT ALSO BEING ON THE CENTERLINE OF SAID MARRIETA ROAD;

THENCE NORTH 00° 17 32" WEST ALONG SAID EAST LINE AND ALONG SAID CENTERLINE, A DISTANCE OF 1743.84 FEET TO THE MOST SOUTHERLY CORNER OF PARCEL 4270-21;

THENCE NORTH 51° 49 23" WEST ALONG THE SOUTHWESTERLY LINE OF SAID PARCEL 4270-2, A DISTANCE OF 345.13 FEET TO THE BEGINNING OF A TANGENT CURVE, CONCAVE TO THE SOUTHEAST, HAVING A RADIUS OF 265.00 FEET;

THENCE NORTHWESTERLY ALONG SAID SOUTHWESTERLY LINE AND ALONG SAID CURVE, TO THE LEFT, THROUGH A CENTRAL ANGLE OF 39° 20 39", AN ARC DISTANCE OF 244.27 FEET;

THENCE SOUTH 89° 49 59" WEST TANGENT TO SAID CURVE AND ALONG THE SOUTH LINE OF SAID PARCEL 4270-2, A DISTANCE OF 1137.64 FEET;

THENCE SOUTH 52° 05 32" WEST, A DISTANCE OF 1230.76 FEET TO THE TRUE POINT OF BEGINNING.

PARCEL 3: (APNS: 310-170-058-9 AND 310-220-030-1)

THAT PORTION OF THE SOUTHWEST QUARTER OF SECTION 33, TOGETHER WITH THAT PORTION OF THE SOUTHWEST QUARTER OF SECTION 33, TOWNSHIP 4 SOUTH, RANGE 3 WEST, SAN BERNARDINO COUNTY, CALIFORNIA, SAID PORTIONS BEING DESCRIBED AS FOLLOWS:

COMMENCING AT THE NORTHWEST CORNER OF SAID SOUTHEAST QUARTER, SAID CORNER BEING ON THE CENTER LINE REDLANDS AVENUE (FORMERLY KITCHING STREET), AS SHOWN BY RECORD OF SURVEY ON FILE IN BOOK 62 OF RECORD OF SURVEYS AT PAGES 41 AND 42 THEREOF, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA;

THENCE SOUTH 00° 10 39" EAST, A DISTANCE OF 823.38 FEET;

THENCE NORTH 89° 49 21" EAST, A DISTANCE OF 44.00 FEET TO THE EAST RIGHT-OF-WAY LINE OF REDLANDS AVENUE CONVEYED TO THE COUNTY OF RIVERSIDE BY DEED RECORDED MAY 6, 1963 AS INSTRUMENT NO. 46411; OFFICIAL RECORDS OF RIVERSIDE COUNTY, CALIFORNIA, SAID POINT BEING ON THE EXIT RIGHT-OF-WAY LINE OF REDLANDS AVENUE CONVEYED TO THE COUNTY OF RIVERSIDE BY DEED RECORDED MAY 6, 1963 AS INSTRUMENT NO. 46411, OFFICIAL RECORDS OF RIVERSIDE COUNTY, CALIFORNIA;

THENCE SOUTH 00° 10 39" EAST ALONG SAID EAST RIGHT-OF-WAY LINE, A DISTANCE OF 1816.45 FEET TO A POINT ON THE CENTERLINE OF ELLIS AVENUE (60.00 FEET IN WIDTH);

THENCE NORTH 89° 49 34" EAST ALONG SAID CENTER LINE, A DISTANCE OF 669.71 FEET FOR THE TRUE POINT OF BEGINNING;

THENCE NORTH 00° 10 26" WEST, A DISTANCE OF 64.00 FEET;

THENCE NORTH 52° 05 23" EAST, A DISTANCE OF 2409.79 FEET TO A POINT ON THE WEST RIGHT-OF-WAY LINE OF MARRIETA ROAD (80.00 FEET IN WIDTH);

THENCE NORTH 89° 42 28" EAST, A DISTANCE OF 30.00 FEET TO A POINT ON THE EAST LINE OF SAID SECTION 32, SAID POINT ALSO BEING ON THE CENTERLINE OF SAID MARRIETA ROAD;

THENCE NORTH 00° 17 32" WEST ALONG SAID EAST LINE AND ALONG SAID CENTERLINE, A DISTANCE OF 1423.71 FEET TO THE SOUTHWEST CORNER OF THE NORTH HALF OF THE NORTHWEST QUARTER OF THE SOUTHWEST QUARTER OF SAID SECTION 33;

THENCE NORTH 89° 58 42" EAST ALONG THE SOUTH LINE OF SAID NORTH HALF OF THE NORTHWEST QUARTER OF THE SOUTHWEST QUARTER, A DISTANCE OF 2713.52 FEET TO A POINT ON THE SOUTHWESTERLY LINE OF PARCEL 4270-1 OF SAID RECORD OF SURVEY;

THENCE SOUTH 51° 49 23" EAST ALONG SAID PARCEL 4270-1, A DISTANCE OF 2566.04 FEET;

THENCE SOUTH 39° 58 42" WEST, A DISTANCE OF 330.49 FEET;

THENCE SOUTH 41° 33 24" WEST, A DISTANCE OF 133.70 FEET TO A POINT ON A LINE PARALLEL WITH AND DISTANT NORTHERLY 30.00 FEET, MEASURED AT A RIGHT ANGLE, FROM SAID ELLIS AVENUE;

THENCE NORTH 89° 58 12" WEST ALONG SAID PARALLEL LINE, A DISTANCE OF 762.51 FEET TO A POINT ON THE WEST LINE OF THE EAST HALF OF THE SOUTHWEST QUARTER OF SAID SECTION 33;

THENCE SOUTH 00° 10 48" EAST ALONG SAID WEST LINE, A DISTANCE OF 30.00 FEET TO A POINT ON THE SOUTH LINE OF SAID SOUTHWEST QUARTER OF SECTION 33, SAID POINT ALSO BEING ON THE CENTERLINE OF SAID ELLIS AVENUE (60.00 FEET IN WIDTH);

THENCE NORTH 89° 58 12" WEST ALONG SAID SOUTH LINE AND ALONG SAID CENTERLINE, A DISTANCE OF 660.60 FEET TO THE SOUTHEAST CORNER OF THE WEST HALF OF THE WEST HALF OF THE SOUTHWEST QUARTER OF THE SOUTHWEST QUARTER OF SAID SECTION 33;

THENCE NORTH 00° 14 09" WEST ALONG THE EAST LINE OF SAID EAST HALF OF THE WEST HALF OF THE SOUTHWEST QUARTER OF THE SOUTHWEST QUARTER, A DISTANCE OF 44.00 FEET TO A POINT ON A LINE PARALLEL WITH AND DISTANT NORTHERLY 44.00 FEET, MEASURED AT A RIGHT ANGLE, FROM SAID CENTERLINE OF ELLIS AVENUE;THENCE NORTH 89° 58 12" WEST ALONG SAID CENTERLINE, A DISTANCE OF 330.45 FEET TO THE SOUTHEAST CORNER OF SAID SECTION 32;

THENCE SOUTH 89° 49 34" WEST ALONG THE SOUTH LINE OF SAID SECTION 32 AND ALONG SAID CENTERLINE OF ELLIS AVENUE, A DISTANCE OF 1638.62 FEET TO THE TRUE POINT OF BEGINNING.

SAID LAND IS SHOWN AS PARCEL 1, PARCEL 2 AND PARCEL 3 OF LOT LINE ADJUSTMENT NO. 98-5053 RECORDED FEBRUARY 16, 2000 AS INSTRUMENT NO. 2000-059231 OF OFFICIAL RECORDS OF SAID COUNTY.

PROPERTY OWNER

IDI LOGISTICS
840 APOLLO STREET, SUITE 343
EL SEGUNDO, CA 90245
213-330-6030

ADDRESS OF THE PROPERTY

TBD

ASSESSOR'S PARCEL NUMBER

310-170-026-8, 310-170-057-4, 310-170-058-9,
310-220-030-1

ZONING

GENERAL INDUSTRIAL

APPLICANT

IDI LOGISTICS
840 APOLLO STREET, SUITE 343
EL SEGUNDO, CA 90245
213-330-6030

APPLICANT'S REPRESENTATIVE

HPA, INC.
18831 BARDEEN AVE SUITE 100
IRVINE CA 92612
TEL: 949-863-1770
ATTN: STEVE HONG

VICINITY MAP

PROJECT DATA

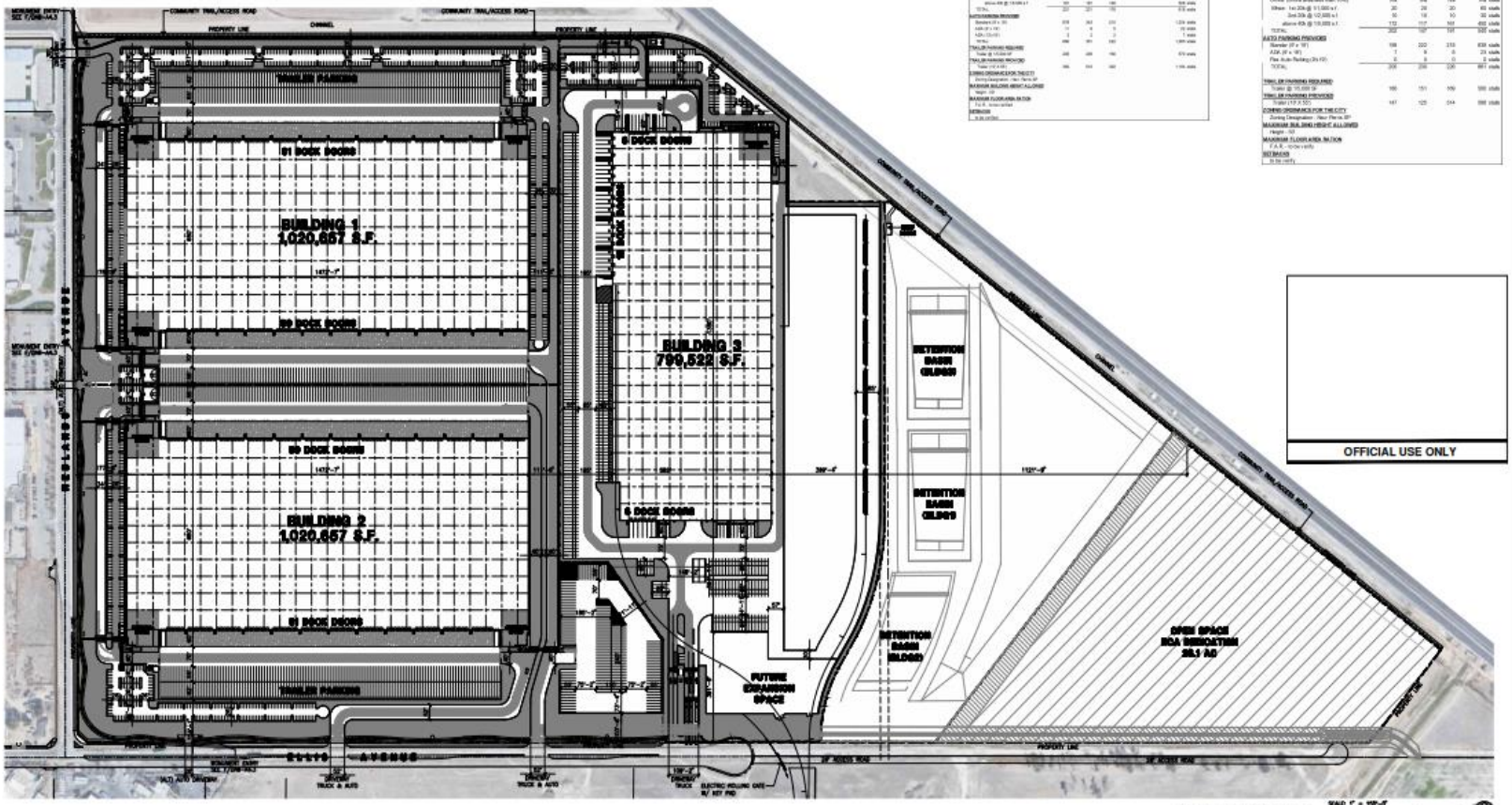
SITE AREA	BLDG 1	BLDG 2	BLDG 3	LOT A	NON BLDG	TOTAL
sq ft	2,170,440	2,401,682	2,432,155	1,331,206	4,180,972	9,967,121 s.f.
acres	49.8	55.1	55.8	30.6	96.0	228.8 ac
BUILDING AREA						
Office	50,000	50,000	50,000			50,000 s.f.
Warehouse	970,657	970,657	749,522			2,690,835 s.f.
TOTAL	1,020,657	1,020,657	799,522			2,840,835 s.f.
COVERAGE	46.9%	42.5%	32.9%			39.0%
CLEAR HEIGHT	40	40	40			
AUTO PARKING REQUIRED						
Office (office area less than 10%)	125	125	100			350 stalls
Other - 1st 20k @ 1/1,000 s.f.	20	20	20			60 stalls
2nd 20k @ 1/2,000 s.f.	10	10	10			30 stalls
above 40k @ 1/5,000 s.f.	16	16	16			48 stalls
TOTAL	171	171	146			488 stalls
AUTO PARKING PROVIDED						
Standard (9' x 18')	618	643	370			1,631 stalls
ADA (9' x 18')	11	9	9			29 stalls
ADA (12'x18')	3	3	3			9 stalls
TOTAL	632	655	382			1,669 stalls
TRAILER PARKING REQUIRED						
Trailer @ 1/10,000 SF	102	102	80			284 stalls
TRAILER PARKING PROVIDED						
Trailer (10' X 55')	102	102	80			284 stalls
ZONING DESIGNATION FOR THE CITY						
Zoning Designation - Per Perris, SP						
MAXIMUM BUILDING HEIGHT ALLOWED						
Height - 50						
MAXIMUM FLOOR AREA RATION						
F.A.R. - to be verify						
SETBACKS						
to be verify						

ORIGINAL 2010 EIR

	BLDG A A-1	BLDG A A-2	BLDG B	BLDG C	TOTAL
SITE AREA					
sq ft					9,398,529
acres					215.7
net site area					
sq ft	3,163,488	1,343,440	1,899,016	6,332,913	
acres	72.6	30.1	43.7	145.4	
BUILDING AREA					
mezzanine		34,947			
office	10,000	10,000	15,000	45,000	
warehouse	788,102	620,299	598,800	2,007,201	
TOTAL	798,102	630,299			
Future Expansion		84,000			
TOTAL BUILDING AREA		1,813,102	642,899	613,800	3,189,456
COVERAGE		31%	49%	49%	34%
AUTO PARKING REQUIRED					
(Office area is less than 10%)					
w/ warehouse					
1st 20k @ 1/1000	20	20	20	20	60
2nd 20k @ 1/2000	10	10	10	10	40
above 40k @ 1/5000	138	138	121	174	569
Total parking required	168	168	151	204	709
Trailer @ 1/10000	104	104	120	182	625
AUTO PARKING PROVIDED					
standard	168	192	143	180	680
handicap	8	8	8	8	29
TOTAL PARKING PROVIDED	176	200	151	204	709
Trailer Provided	241	254	150	246	875

MAJOR MOD 1 - APRIL 2020

SITE AREA	BLDG 1	BLDG 2	BLDG 3	TOTAL
sq ft	1,750,144	1,311,645	3,515,788	6,459,577 s.f.
acres	39.9	27.5	80.7	148.3 ac
BUILDING AREA				
Office	50,000	25,000	15,000	75,000 s.f.
Warehouse	878,170	668,377	826,800	2,363,347 s.f.
TOTAL	895,170	629,377	841,800	2,356,347 s.f.
COVERAGE	51.2%	51.2%	24.0%	36.5%
CLEAR HEIGHT	42	42	42	
AUTO PARKING REQUIRED				
Office (office area less than 10%)	n/a	n/a	n/a	n/a stalls
Other - 1st 20k @ 1/1,000 s.f.	20	20	20	60 stalls
2nd 20k @ 1/2,000 s.f.	10	10	10	30 stalls
above 40k @ 1/5,000 s.f.	172	127	597	892 stalls
TOTAL	202	157	627	982 stalls
AUTO PARKING PROVIDED				
Standard (9' x 18')	198	222	218	638 stalls
ADA (9' x 18')	7	8	6	21 stalls
Flex Auto Parking (9x18)	0	0	0	0 stalls
TOTAL	205	230	224	661 stalls
TRAILER PARKING REQUIRED				
Trailer @ 1/5,000 SF	160	151	169	500 stalls
TRAILER PARKING PROVIDED				
Trailer (10' X 55')	141	125	344	590 stalls
ZONING DESIGNATION FOR THE CITY				
Zoning Designation - Near Perris, SP				
MAXIMUM BUILDING HEIGHT ALLOWED				
Height - 50				
MAXIMUM FLOOR AREA RATION				
F.A.R. - to be verify				
SETBACKS				
to be verify				



OFFICIAL USE ONLY

HPA architecture
hpa, inc.
18831 bardeen avenue - ste. #100
irvine, ca
92612
tel: 949.863.1770
fax: 949.863.1601
email: hpa@hparchs.com

IDI Logistics
IDI Logistics
840 Apollo Street, Suite 343
El Segundo, CA 90245
tel: 213-330-6030

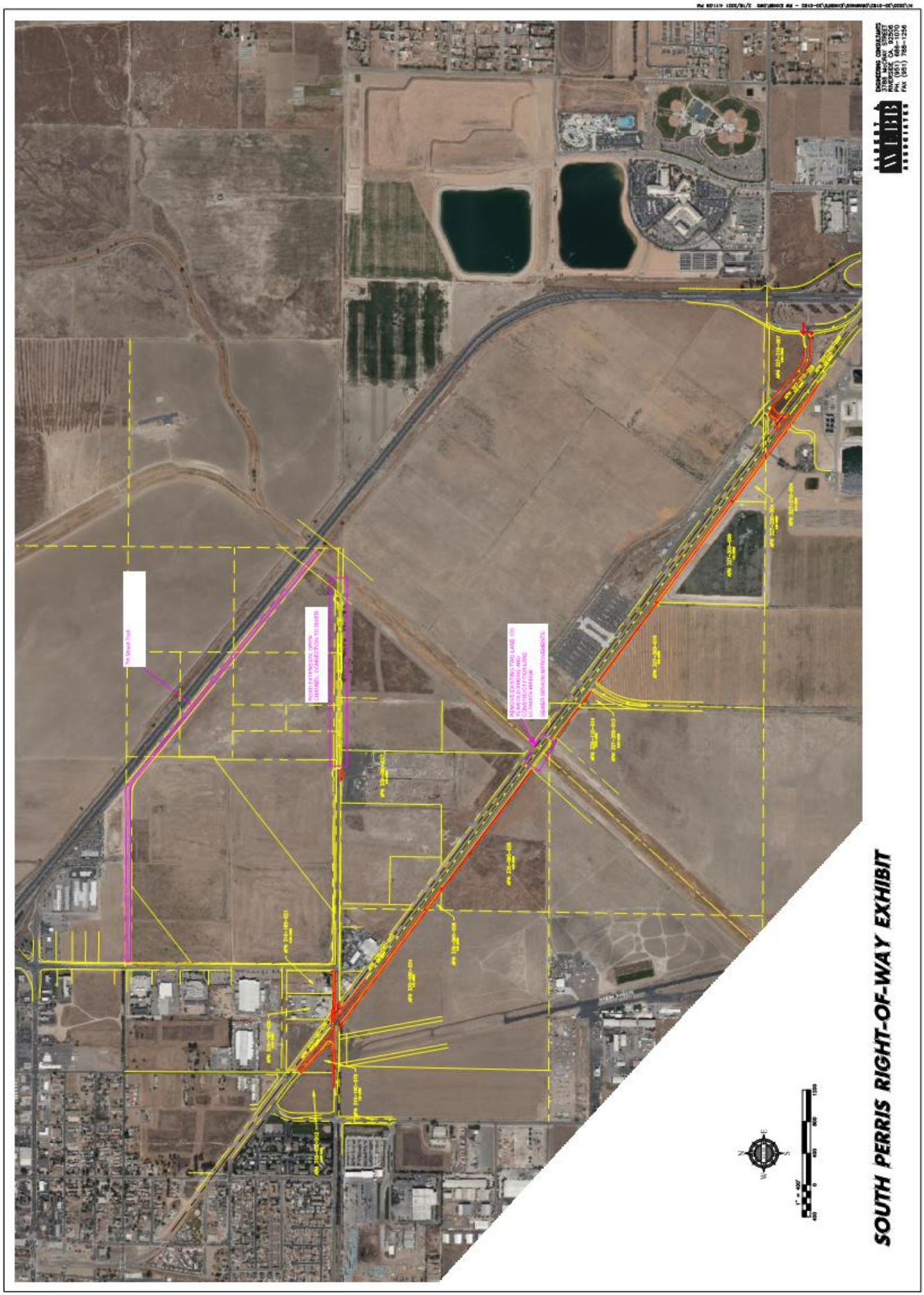
Project:
PERRIS LOGISTICS CENTER
NORTH
REDLANDS AVE. & ELLIS AVE.
PERRIS, CA 92570
ORIGINAL PROJECT NUMBER
08-01-0007
MINOR MODIFICATION PLAN
19-05002
MINOR MOD (D)

Consultants:
CIVIL: WEBB ASSOCIATES
STRUCTURAL
MECHANICAL
PLUMBING
ELECTRICAL
LANDSCAPE: HUNTER
FIRE PROTECTION
SOILS ENGINEER

Title: MASTER SITE PLAN
Project Number: 19122
Drawn by: CR
Date: 03/25/21
Revision:
Sheet:
DAB-A1.0T

Figure 1 (Site Plan):

Figure 2 (Offsite Improvements):



4. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REVIEW

CEQA Objectives

CEQA, a statewide environmental law contained in Public Resources Code §§ 21000-21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies inform themselves of the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the general public an opportunity to comment on the information. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an EIR and balance the project's environmental concerns with other goals and benefits in a statement of overriding considerations.

CEQA Requirements for Environmental Impact Report (EIR) Addendums

The Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines) allow for the updating and use of a previously-certified EIR for projects that have changed or are different from the previous project or conditions analyzed in the certified EIR. In cases where changes or additions occur with no new or more severe significant environmental impacts, an Addendum to a previously certified EIR may be prepared. See State CEQA Guidelines § 15164.

The following describes the requirements of an Addendum, as defined by State CEQA Guidelines § 15164:

a. The lead agency or responsible agency shall prepare an Addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in § 15162 calling for preparation of a Subsequent EIR have occurred.

b. An Addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in § 15162 calling for the preparation of a Subsequent EIR or negative declaration have occurred.

c. An Addendum need not be circulated for public review, but can be included in or attached to the Final EIR.

d. The decision-making body shall consider the Addendum with the Final EIR prior to making a decision on the project.

e. A brief explanation of the decision not to prepare a Subsequent EIR pursuant to § 15162 should be included in an Addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

As noted above, State CEQA Guidelines § 15164(a) and (b) allow for the preparation of an Addendum if none of the conditions described in § 15162 are met. State CEQA Guideline § 15162 describes the conditions under which a Subsequent EIR must be prepared, as follows:

a. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of environmental effects or a substantial increase in the severity of previously identified significant effects;

b. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

c. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:

1. The project will have one or more significant effects not discussed in the previous EIR;

2. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

3. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternatives; or

4. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

If none of these circumstances are present, and only minor technical changes or additions are necessary to update the previously certified EIR, an Addendum may be prepared. See State CEQA Guidelines § 15164. As provided in detail herein, none of the above circumstances that warrant the preparation of a Subsequent (or Supplemental) EIR are present. In fact, pursuant to Guidelines sections §§ 15163 and 15164, because the above conditions are not met, a Subsequent or Supplemental EIR ***cannot*** be prepared.

5. FORMAT AND CONTENT OF THIS EIR ADDENDUM

The following components comprise the EIR Addendum in its totality:

a. The Introduction and the Project Description.

b. The completed Initial Study/Environmental Checklist Form and its associated analyses which conclude that the proposed Project would not result in any new

significant environmental impacts or substantially increase the severity of environmental impacts beyond those disclosed in the previously certified EIR.

c. The technical appendices attached hereto as Appendices 1 through 5, which consist of the Air Quality modeling prepared by Albert A. Webb Associates (March 2021), the Trip Generation Analysis prepared by Albert A. Webb Associates (March 2021), the Vehicle Miles Traveled ("VMT") Analysis prepared by Albert A. Webb Associates (March 2021), the Ellis Avenue Railroad Crossing Closure Traffic Detour Analysis prepared by Albert A. Webb Associates (March 2021), and the MSHCP Consistency Analysis to Support Amendment to JPR#09-04-24-01.

State CEQA Guidelines § 15150 states that an "EIR or Negative Declaration may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public." Accordingly, the above-listed technical reports are incorporated herein by reference pursuant to § 15150. In addition, this EIR Addendum incorporates the following additional documents by reference in accordance with § 15150:

a. The Draft and Final South Perris Industrial EIR (SCH No. No. 2008071060), accompanying Mitigation Monitoring Program (MMP), Technical Appendices to EIR, Findings and Statement of Facts, Statement of Overriding Considerations, and the associated City Council Resolution. The EIR was certified by the City Council on July 13, 2010.

b. All other materials before the City Council when it approved the Original Project and certified the EIR, specifically including but not limited to Ordinance No. No. 1271 and Resolution No. 4326 and all associated staff reports and attachments, as well as the materials that were previously before the City Planning Commission.

c. The 2020 Addendum (Addendum 20-0562), the associated City Council resolution, and all other materials (including other resolutions and ordinances) before the City Council when it approved Major Modification 19-05332 on June 9, 2020, including all associated staff reports and attachments, as well as the materials that were previously before the City Planning Commission.

d. All biological studies and surveys relating to the Site, specifically including all surveys and studies conducted by GLA following the June 9, 2020 approval of the Addendum 20-0562 and Major Modification 19-05332.

The above-referenced documents are available for public review on the City's website and at the City of Perris City Hall, 101 N D Street, Perris, CA 92570.

Initial Study Checklist

The City prepared the proposed Project's Initial Study Checklist as suggested by State CEQA Guidelines §§ 15063(d)(3) and 15168(c)(4). The State CEQA Guidelines include a suggested checklist to indicate whether the conditions set forth in § 15162, which would require a subsequent or supplemental EIR, are met and whether there would be new significant impacts resulting from the project not examined in the previously-certified EIR. The checklist and an explanation of each answer on the form can be found in Section 6.

As presented in Section 6, there are four possible responses to each of the environmental issues included on the checklist:

1. **New Significant Impact**. This response is used to indicate when the Project has changed to such an extent that major revisions to the EIR are required due to the presence of new significant environmental effects.

2. **More Severe Impacts**. This response is used to indicate when the circumstances under which the Project is undertaken have changed to such an extent that major revisions to the EIR are required due to the fact that the severity of previously identified significant effects would substantially increase.

3. **New Ability to Substantially Reduce Significant Impact**. This response is used to indicate when new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified, indicates that there are new mitigation measures or alternatives available to substantially reduce significant environmental impacts of the Project, but the Project proponent declines to adopt the mitigation measure(s) or alternative.

4. **No Substantial Change from Previous Analysis**. This response is used to indicate that the proposed Project would not create a new impact or substantially increase the severity of the previously-identified environmental impact.

The Initial Study Checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the current Project in the context of environmental impacts addressed in the previously certified EIR for the Original Project. In doing so, the City has determined than an addendum to the EIR is the appropriate CEQA document, and that due to fact that neither Plan A nor Plan B would result in any new or increased significant impacts, a subsequent or supplemental EIR cannot legally be required.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below (☒) would be potentially affected by this project, involving at least one impact that is a "New Significant Impact" or "More Severe Impact" as indicated by the checklist on the following pages. As stated below, the modified project does not result in any new impacts that were not already analyzed in the previously certified EIR.

☐ Aesthetics	☐ Hazards & Hazardous Materials	☐ Recreation
☐ Agriculture & Forest Resources	☐ Hydrology/Water Quality	☐ Transportation
☐ Air Quality	☐ Land Use / Planning	☐ Tribal Cultural Resources
☐ Biological Resources	☐ Mineral Resources	☐ Utilities/Service Systems
☐ Cultural Resources	☐ Noise	☐ Wildfire

☐ Energy	☐ Paleontological Resources	☐ Mandatory Findings of Significance
☐ Geology/Soils	☐ Population/Housing	
☐ Greenhouse Gas Emissions	☐ Public Services	

DETERMINATION

On the basis of this initial evaluation:

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS NOT PREPARED:

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

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

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

A PREVIOUS ENVIRONMENTAL IMPACT REPORT/NEGATIVE DECLARATION WAS PREPARED:

☐ I find that although the proposed project could have a significant effect on the environment, **NO NEW ENVIRONMENTAL DOCUMENTATION IS REQUIRED** because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably different mitigation measures have been identified and (f) no mitigation measures found infeasible have become feasible.

☒ I find that although all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, some changes or additions are necessary but none of the conditions described in California Code of Regulations, Section 15162 exist. An **ADDENDUM** to a previously-certified EIR or Negative Declaration has been prepared and will be considered by the approving body or bodies.

☐ I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore, a **SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT** is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.

☐ I find that at least one of the following conditions described in California Code of Regulations, Section 15162, exist and a **SUBSEQUENT ENVIRONMENTAL IMPACT REPORT** is required: (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial

increase in the severity of previously identified significant effects; (2) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any the following: (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration; (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration; (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or, (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects of the project on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.

Signature	Date
Printed Name	

6. ENVIRONMENTAL ANALYSIS

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Cod §§ 21000-21178.1), the following has been prepared to analyze the proposed Project to determine if any potential significant impacts upon the environment beyond those disclosed in the certified EIR would result from construction and implementation of the Project. As detailed herein, the Project would not result for any new or increased impacts not already analyzed in the previously certified EIR, nor is there any new information of substantial importance. Accordingly, the Project is fully covered by the certified EIR, consistent with the analysis in the 2020 Addendum for both Plan A and Plan B analyzed therein.

6.A. Aesthetics

	New Significant Impact	***More Severe Impacts***	***New Ability to Substantially Reduce Significant Impact***	***No Substantial Change from Previous Analysis***
Would the project:				
a. Have a substantial adverse effect upon a scenic highway corridor within which it is located?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

The previously certified South Perris Industrial EIR prepared to analyze the impacts of the Original Project identified potential aesthetic impacts on scenic vistas, scenic resources, the existing visual character and its surroundings, and light and glare, resulting from development of the Original Project. The EIR concluded that all of these impacts resulting from the Original Project were less than significant, and no mitigation measures were required.

All of the potential impacts of the Project are already covered by the EIR's analysis, and in fact, the Project will reduce all the categories of aesthetic impacts that the EIR assumed would result from the development of the Site. The Project will result in less overall square footage – by 325,618 square feet – and one less building than the Original Project, reducing the already less than significant aesthetic impacts (i.e., impacts on scenic vistas, scenic resources and highways, and existing visual character and its surroundings) disclosed and analyzed in the EIR, which assumed that the Site would be developed with more square footage and a larger building footprint. In addition, as described in the EIR, any additional light generated by the Project (including that which may result from the addition of the rail access spur), would be required to comply with lighting requirements contained in the City's Zoning Code and Riverside County Ordinance 655, and therefore, no significant light and glare impacts would result from the Project.

Accordingly, the Project would not result in any new or increased significant impacts on aesthetics that were not already analyzed in, and fully covered by, the previously certified EIR. Instead, because the Project would result in less development of the Site, impacts on aesthetics would generally be reduced from the impacts of the Original Project.

6.B. Agricultural Resources

	New Significant Impact	***More Severe Impacts***	***New Ability to Substantially Reduce Significant Impact***	***No Substantial Change from Previous Analysis***
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section	☐	☐	☐	☒

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

The EIR determined that no farmland or agriculturally-zoned property would be significantly impacted by the Original Project. The EIR also concluded that, based on the Initial Study, there were no significant impacts on agricultural or forestry resources such that further discussion in the EIR was not warranted. Although the Site had been designated Locally Important Farmland, the EIR determined that due to the on-site soil characteristics, the local land use and planning designations of the Site, and the economic and regulatory hurdles facing local famers, it was reasonable to conclude that the intensification of agricultural uses within the project limits was not feasible. No mitigation measures were proposed or adopted, as the EIR concluded all impacts resulting from the Original Project were less than significant without mitigation.

The Project does not include development of property outside of the same Site previously analyzed by the EIR (one of the three project sites analyzed therein). In other words, the Project would result in the development of the same land previously analyzed by the EIR, and therefore neither plan would affect any farmland or forest resources outside of the Original Project's development envelope, as analyzed in the EIR. Further, it bears noting farming uses in the area of the Site have further declined since the EIR was certified, as the long term plan is for increased urbanization and industrial uses, like the Project.

Accordingly, the Project would not result in any new or increased significant impacts on agricultural or forestry resources that were not already analyzed in, and fully covered by, the previously certified EIR.

6.C. Air Quality

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	☒
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d. Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☐	☒

Short Term Construction Impacts

The EIR identified significant short term impacts on air quality from the construction activities associated with the Original Project. Short term impacts identified in the EIR included fugitive dust and other particulate matter, as well as exhaust emissions generated by earthmoving activities and operation of grading equipment during site preparation. The EIR concluded that before mitigation, the short term emissions produced during construction of the Original Project would exceed the South Coast Air Quality Management District (SCAQMD) thresholds for volatile organic compounds (VOC), nitrogen oxides (NOx), carbon monoxide (CO), fine particulate matter (PM_{10}), and respirable particulate matter ($PM_{2.5}$).

The EIR proposed several mitigation measures, which were adopted as follows:

4.3.6.1A Prior to issuance of grading permits, the project applicant shall require by contract specifications that construction operations rely on electricity from infrastructure (e.g. power poles) surrounding the construction site instead of using potable diesel- or gasoline-powered generators. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City.

4.3.6.1B Prior to the issuance of grading permits, the project applicant shall require by contract specifications that construction activities are timed so as not to interfere with peak hour traffic and minimize obstruction of through traffic lanes adjacent to the site.

Dedicated turn lanes for the movement of construction trucks and equipment shall be provided for each phase of development. Construction trucks shall be routed away from congested streets and sensitive receptor areas. A flag person shall be retained by the construction supervisor to maintain safety adjacent to existing roadways. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City. In addition, the project applicant shall require by contract specifications the following provisions:

- Prohibit truck idling in excess of five minutes, both on- and off- site;
- Configure construction parking to minimize traffic interference;
- Improve traffic flow by signal synchronization; and
- All vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.

4.3.6.1C The construction contractor shall utilize alternative-fueled construction equipment to the maximum extent feasible. All diesel-powered construction equipment shall meet or exceed Tier III standards, or shall be equipped with CARB-verified oxidation catalysts and diesel particulate filter emission controls, using the greatest control efficiency for the specific category of equipment. The construction contractor shall demonstrate that these verified/certified technologies are available to be used at the time of project construction.

4.3.61D The construction contractor shall utilize pre-coated, pre-colored, and naturally colored building materials when feasible to minimize the amount of VOC emissions from painting activities. Coatings and solvents with a VOC content lower than required under SCAQMD Rule 1113 or no-VOC paints and architectural coatings shall be employed. A list of low/no-VOC paints is provided at the SCAQMD website (www.aqmd.gov/prdas/brochures/paintguide.html). All paints shall be applied using either high-volume low-pressure (HVLP) spray equipment or by hand application, or other application techniques with equivalent or higher transfer efficiency. Specific requirements shall appear in the project construction plans and construction documents.

4.3.6.2A In order to reduce particulate matter emissions during project construction, the project applicant shall apply non-toxic soil stabilizers or a comparable dust suppressant to all inactive construction areas (previously graded areas inactive for five consecutive days or more). Chemical soil stabilizers, if used, shall be applied according to manufacturers' specifications. This mitigation measure incorporates the applicable provisions identified in Rule 403 regarding soil stabilization.

4.3.6.2B In order to reduce particulate matter emissions during project construction, the project applicant shall establish a vegetative ground cover within 21 working days after active operations have ceased. This mitigation measure incorporates the applicable provisions identified in Rule 403 regarding revegetation of disturbed areas.

4.3.6C In order to reduce particulate matter emissions during project construction, the project applicant shall water exposed surfaces three times a day. This mitigation

measure incorporates the applicable provisions identified in Rule 403 regarding watering of the site.

4.3.6.2D In order to reduce particulate matter emissions during construction, the project applicant shall enforce speeds limits on unpaved roads to less than 15 miles per hour.

4.3.6.2E In order to reduce particulate matter emissions during clearing, grading, earthmoving, excavation, or transportation of cut or fill materials, the project applicant shall utilize water trucks or sprinkler systems to prevent dust from leaving the site.

4.3.6F In order to reduce particulate matter emissions during construction, the project applicant shall utilize water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site.

4.3.6.2G In order to reduce particulate matter emissions during construction, the project applicant shall temporarily terminate soil disturbance activities when high winds exceeding 25 miles per hour (measured as instantaneous gusts) make dust control extremely difficult.

4.3.6.2H In order to reduce particulate matter emissions during construction, the project applicant shall require soil stockpiled for more than two days to be converted, kept moist, or treated with soil binders to prevent dust generation.

4.3.6.2I In order to reduce particulate matter emissions during construction, the project applicant/contractor shall reduce "spill-over" effects by preventing soil erosion, washing dirt from vehicles entering public roadways, and washing/sweeping project access to public roadways on a regular schedule. All streets shall be swept once a day if visible soil materials are carried to adjacent streets. Wheel washers shall be installed where vehicles enter and exit unpaved roads onto paved roads. Street sweepers shall comply with SCAQMD Rule 1186. This mitigation measure incorporates the applicable provisions identified in Rule 403 regarding street sweeping and wheel washing.

4.3.6.2J In order to reduce particulate matter emissions during construction, the project applicant shall require all trucks hauling dirt, sand, sand, soil, or other loose materials be covered or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114. This mitigation measure incorporates the applicable provisions identified in Rule 403 regarding covering of trucks and maintenance of freeboard.

4.3.6.2K The project proponent shall appoint a construction relations officer to act as a community liason concerning on-site construction activity including resolution of issues in relation to PM10 generation. Signage with this contact information shall be made available for each phase site.

4.3.6.2L In order to reduce particulate matter emissions during construction, the project applicant/contractor shall apply water three times daily, or non-toxic soil

stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces.

4.3.6.2M Prior to the issuance of grading permits for each development site, the project developer shall submit to the SCAQMD, SCAQMD Rule 403 Form 403N (Large Operation Notification Form) and contact SCAQMD engineering and compliance staff.

Even with the implementation of the proposed mitigation measures and adherence to SCAQMD Rule 403 for fugitive dust, the EIR found the Original Project's emissions during construction would remain significant and unavoidable, and that while the mitigation measures reduce impacts, the EIR concluded the construction of the Original Project would result in emissions of VOC, NOx, CO, PM_{10} and $PM_{2.5}$ all in excess of SCAQMD thresholds. Therefore, impacts related to such emissions would be significant and unavoidable. The EIR also concluded that the Original Project would result in localized construction emissions of nitrogen dioxide (NO_2), PM_{10} and $PM_{2.5}$ above applicable thresholds, even after mitigation. Accordingly, the EIR identified a significant and unavoidable impact relating to temporary construction period impacts on air quality.

Development of the Project would result in the same disturbance area (site footprint of 215.6 acres) as the development of the Site that would have occurred under the Original Project, but a substantial reduction in total square footage constructed. The proposed rail spur, while outside the Original Project site, and other offsite improvements, are no closer to sensitive receptors than the proposed development of the Site under the Original Project, and construction of the rail spur would be similar in nature to the other offsite infrastructure improvements analyzed in the EIR. Further, emissions from the additional construction activities required to develop the proposed rail spur and other off-site improvements required would be less than emissions from the construction of an additional 325,618 square feet of buildings, as was analyzed in the EIR for the Original Project. Given that the total development footprint of the Project is roughly equivalent to the Original Project evaluated in the EIR, the short-term construction emissions are determined to be similar – and actually incrementally reduced – when compared to the Original Project. The short-term construction emissions are also anticipated to be less than the emissions disclosed and analyzed in the EIR due to the implementation of newer and cleaner off-road equipment that has been developed in the decade since the EIR was certified. However, while the construction of the Project would likely result in less emissions of all criteria pollutants, it is assumed that like the Original Project, construction of the Project would still exceed SCAQMD regional construction thresholds for all criteria pollutants except SO2 and will exceed localized thresholds for NOx, PM_{10} or $PM_{2.5}$ after implementation of Mitigation Measures 4.3.6.1A through 4.3.6.2M (EIR, pp. 4.3-56–59;4.3-69).

The Project applicant would be required to implement all applicable mitigation measures imposed on the Original Project by the EIR, including those set forth above, and would also be subject to the same or more stringent regulatory requirements, as such requirements have generally become more strict since the time that EIR was certified (thereby reducing a greater amount of fugitive dust and other emissions), meaning that the EIR disclosed and analyzed greater impacts under the then-existing regulations. The extension of the rail spur will require review and approval by the CPUC, and the Project will also be required to comply with all conditions of approval imposed by the CPUC. Additionally, the Project would result in

generally less construction activity than the Original Project assumed would occur on the Site, as the total square footage constructed is reduced by over 300,000 square feet when compared to the Original Project. Accordingly, the Project would not result in any new or increased significant short term impacts on air quality that were not already analyzed in, and fully covered by, the previously certified EIR.

Long Term Operational Impacts

The EIR identified significant impacts on air quality resulting from the operation of the buildout of the Original Project, which included emissions of criteria pollutants VOC, CO, NOx, PM_{10} and $PM_{2.5}$ above SCAQMD thresholds and localized emissions of PM_{10} and $PM_{2.5}$ above applicable thresholds of significance.

The EIR proposed several mitigation measures, which were adopted as follows:

4.3.6.3A In order to reduce the project's operation diesel particulate matter emissions, prior to the issuance of building permits, the project applicant shall require by contract specifications that signs shall be posted on the site in loading bay areas informing truck drivers of the California Air Resources Board regulations that limit truck idling to no more than five (5) minutes, both on- and off-site. Contract specifications shall be included in the proposed project construction documents, which shall apply to the developer/successor-in-interest and shall be reviewed by the City.

4.3.6.3B In order to reduce the project's operational diesel particulate matter emissions, prior to the issuance of building permits, the project applicant shall require by contract specifications that electrical hook-ups shall be installed in loading bay areas to eliminate unnecessary idling of main and auxiliary truck engines. Contract specifications shall be included in the proposed project construction documents, which shall apply to the developer/successor-in-interest and shall be reviewed by the City.

4.3.6.3C In order to reduce the project's operational diesel particulate matter emissions, prior to issuance of building permits, the project applicant shall require by contract specifications that all on-site forklifts and other equipment will not be diesel-powered, but required to be electric or some other type of low-emission technology available at the time of development. Contract specifications shall be included in the proposed project construction documents, which shall apply to the developer/successor-in-interest and shall be reviewed by the City.

4.3.6.3D As part of the building plan approval, the project proponent shall include energy efficient measures that exceed California Title 24 standards by 30 percent for all buildings. Energy efficient measures may include (but are not limited to):

- Installation of efficient lighting and lighting control systems (electronic dimming ballasts and computer-controlled daylight sensors, low-mercury bulbs, and bulb reduction);
- Use of daylight as an integral part of lighting systems in buildings (e.g., skylights);

- Installation of light colored “cool” roofs, cool pavements, and strategically placed shade trees;
- Provision of information on energy management services for large energy users;
- Installation of energy efficient heating and cooling systems, appliances and equipment, and control systems; and
- Installation of light emitting diodes (LEDs) for exterior signs and landscaping; and limiting the hours of operation of outdoor lighting.

4.3.6.3E As part of building plan approval, the project proponent shall accommodate renewable energy facilities. The project shall be structurally designed to be ready to accept the installation of solar and/or wind power systems (subject to Southern California Edison’s program), solar and/or tankless hot water heaters, and energy-efficient heating ventilation and air conditioning (HVAC). Additionally, the project proponent shall educate consumers about existing incentives.

4.3.6.3F As part of building plan approval, the project proponent shall include transportation and motor vehicle reduction measures. Transportation and motor vehicle reduction measures shall apply to the developer/successor-in-interest and shall include (but are not limited to):

- Limit idling time for commercial vehicles, including delivery and construction vehicles, to five minutes or less, both on- and off-site;
- Use low or zero-emission vehicles, including construction vehicles;
- Require implementation of ride sharing programs (e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride sharing vehicles, and providing a web site or message board for coordinating rides for all initial and future occupants.
- For large employers (employers who employ 250 or more employees), provide facilities that encourage bicycle commuting, including (e.g., locked bicycle storage or covered or indoor bicycle parking); and
- Create bicycle lanes and walking paths directed to the location of schools, parks, and other destination points.

4.3.6.3G As part of building plan approval, the project proponent shall include the following project design and operational/health effect measures:

- Project-generated trucks servicing the proposed project shall be restricted from residential areas and schools and, a specific truck route shall be delineated on the circulation/transportation plan, implemented with the use of signage, to direct project-related trucks away from sensitive receptors (i.e., ensure that trucks will not enter residential areas or pass by other sensitive receptor areas);
- Design the warehouse/distribution center and any future expansion such that there are no trucks queuing outside each facility;
- Post signs outside of each facility providing a phone number where neighbors can call if there is a specific issue; and

- Improve traffic flow by signal synchronization.

Even with the implementation of the proposed mitigation measures, the EIR found that it was not possible to quantify the reduction in the amount of emissions that may occur, and considering the volume of emissions generated and consumer habits, the EIR determined it unlikely that identified mitigation measures would result in the reduction of operational project emissions to below SCAQMD levels. In the absence of mitigation to reduce the Original Project's emission of VOC, CO, NOx, PM_{10}, and $PM_{2.5}$ to below SCAQMD thresholds, the EIR concluded and disclosed that the emissions of the foregoing criteria pollutants remained significant and unavoidable.

The EIR also concluded that the Original Project would not result in significant impacts related to consistency with the adopted AQMP, long term CO hotspot impacts, health risks, odors, or imported soil emissions.

For the Project, the long-term operational emissions were modeled using the current California Emissions Estimator Model (CalEEMod™) version 2016.3.2 program based on the land use and traffic assumptions evaluated in the Traffic Generation Analysis and VMT Analysis, attached hereto as Appendices 2 and 3. (*See*, Appendix 1, Air Quality Analysis (Albert A. Webb Associates, March 2021).) The air quality analysis utilized the land use and traffic information and data provided in in this Addendum and specifically Section 6.Q (Transportation) herein, and the same assumptions and methodology as the Original Project evaluated in the EIR, with the following exceptions:

- The operational year selected was 2022.
- The carbon intensity was adjusted to reflect the 33 percent renewable energy required of utility providers by 2020.
- The energy-related emissions were adjusted to reflect the improvements expected from the current 2019 Title 24 standards, which became effective on January 1, 2020 and are anticipated to be 30 percent more efficient.[1]

The results of the analysis are shown in Table 6.C.1, Project Maximum Daily Operation Emissions. As shown in Table 6.C.1, the VOC, NO_X, CO, SO_2, PM_{10}, and PM2.5 emissions for the Project are lower than the Original Project evaluated in the EIR. Although the criteria pollutant emissions from the Project exceed daily thresholds for VOC and NO_X, they do so to a lesser degree than the Original Project evaluated in the EIR, which also exceeded the daily thresholds.

Table 6.C.1, Project Maximum Daily Operation Emissions

Source	Peak Daily Emissions (lb/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
SCAQMD Daily Thresholds	**55**	**55**	**550**	**150**	**150**	**55**

[1] The 2019 Title 24 standards are 7 percent more efficient for residential uses and 30 percent more efficient for non-residential uses than the 2016 standards in CalEEMod: https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf

Modified Project						
Area	65.82	0.00	0.30	0.00	0.00	0.00
Energy	0.12	1.09	0.92	0.01	0.08	0.08
Mobile	12.49	228.08	174.75	1.32	77.17	21.63
Total	**78.43**	**229.17**	**175.97**	**1.33**	**77.25**	**21.71**
Exceeds Threshold?	**Yes**	**Yes**	**No**	**No**	**No**	**No**
Original Project[2]	254.39	1,574.77	1,565.12	3.73	380.96	117.65

Source: **Appendix 1** – CalEEMod Output.

Notes: Maximum emissions shown are the greater of either summer or winter emissions.

[1] The mobile source emissions do not include the anticipated reduction in truck trips anticipated to result from rail service (20 truck trips per day) and therefore presents a more conservative analysis.

[2] Maximum emissions from summer or winter from Phase 3 of Original Project Certified EIR Table 4.3.Q

Accordingly, the Project would reduce operational emissions from the development of the Site when compared to the emissions that the EIR assumed would occur from the operation of the Original Project on the Site, as would be expected because the Project would result in the development of less square footage and accordingly, reduced traffic generation. Additionally, the Project is subject to updated regulations that are more protective of the environment when compared to the regulations that existed when the Original Project was approved and the EIR was certified. However, like the Original Project, the proposed Project will result in significant impacts from emissions of VOC and NOx even after implementation of all feasible mitigation measures imposed on the Original Project, but to a lesser degree than the Original Project.

Carcinogenic and Chronic Project-Related Emission Impacts

The EIR also disclosed and analyzed potentially significant impacts related to health risk from diesel particulate matter emissions from trucks, warehousing operations and locomotives using rail, including impacts on nearby sensitive receptors. In an effort to reduce the carcinogenic and non-carcinogenic chronic project-related emissions impacts, the EIR proposed several mitigation measures, which were adopted as follows:

4.3.6.6A In order to reduce the project's operational DPMO emissions, signs shall be posted on the site in loading bay areas informing truck drivers of the California Air Resources Board regulations that limit truck idling to no more than 5 minutes.

4.3.6.6B In order to reduce the project's operational DPM emissions, electrical hook-ups shall be installed in loading bay areas to eliminate unnecessary idling of main and auxiliary truck engines.

4.3.6.6C In order to reduce the project's operational DPM emissions, all on-site forklifts shall not be diesel powered.

4.3.6.6D If the locomotives that serve the Phase 2 site are not equipped with anti-idling devices, an idling restriction shall be enforced by developer/successor-in-interest.

Locomotives not equipped with anti-idling devices shall be manually limited to no more than 15 consecutive minutes of idling.

4.3.6.6E The developer/successor-in-interest for the Phase 2 site shall establish a complaint line for complaints regarding smoke, noise, and idling in excess of 15 minutes for locomotives idling on the Phase 2 site. This complaint line shall be a toll free 1-800 number and posted on signs within the Phase 2 site.

The EIR concluded that after the implementation of the foregoing mitigation measures, the Original Project's impacts on carcinogenic and chronic project-related emissions impacts would be reduced to less than significant levels.

The Project would not result in new or increased impacts on health risk when compared to the impacts of the Original Project already analyzed in the EIR. All significant carcinogenic and chronic project-related impacts identified by the EIR would result from the use of large, heavy-duty diesel-powered equipment, forklifts, train engines, and warehouse equipment for delivering and moving supplies during operation of the Original Project. The Project would not increase the use of warehouse industrial equipment at the Site. Instead, the Project would result in reduced square footage, reducing impacts resulting from industrial warehouse operations related to delivering and moving supplies, and therefore reducing health risks.

Specifically, regarding cancer and non-cancer risks from diesel particulate matter (DPM) resulting from the truck trips generated by the Project, the impacts are anticipated to be similar to the Original Project because the Original Project's total daily truck trip volumes are decreased due to the reduction in warehouse square footage. More specifically, as shown in Tables 2 through 3 in Section 6.Q (Transportation) herein and Appendices 2 and 3, the total daily trips generated by the Project would be 5,937 (in passenger car equivalents ["PCE"]), whereas the Original Project's total daily PCE trips for Phase 3 would have been 6,484 trips. The Project therefore represents a reduction of 547 PCE trips, which equates to a reduction of 366 actual vehicle trips (4,343 from the Original Project's development of the Site, compared to 3,977 for the proposed Project). As the cancer and non-cancer risk is based on diesel truck emissions, fewer trucks accessing the Site under Project would not result in greater emissions than the Original Project evaluated in the EIR, and therefore would not be expected to increase cancer or non-cancer risk. Instead, the Project would reduce health risk impacts. The Project would also result in less PCE and raw vehicle trips than analyzed for Plan A under the 2020 Addendum, which by approving the 2020 Addendum, the City Council already concluded would not have resulted in any new or increased impacts on the environment not already analyzed in the EIR, including all impacts air quality, and specifically impacts related to health risks.

In addition, a potential extension of a rail spur to the Phase 2 site was included in the EIR's operation emissions analysis and localized emissions analysis, and the mitigation measures relating to rail operations that were imposed on the Phase 2 site (Mitigation Measures 4.3.6.6D and 4.3.6.6E, above) would also be imposed on the Site by the Project here. With the implementation of these mitigation measures, any impacts stemming from locomotives serving the site would be reduced to less than significant levels (just as it was for the Phase 2 site), particularly when taking into account the considerable reduction of truck traffic that would likely

result from the Project's addition of the rail spur, although this Addendum does not rely on any such reduction.

Further, since the certification of the EIR, applicable regulatory requirements protecting human health, including standards for truck emissions, have become more strict (e.g., 2010 truck restrictions take effect in 2023 thereby greatly reducing the operational emissions of truck fleets), which will also reduce emissions when compared to the emissions that the EIR assumed would result from the Original Project under then-existing regulations. This would be true even if the Project proposed to develop the same amount of square footage as the Original Project, which it does not.

Accordingly, based on all the information and analysis set forth above and in Appendix 1, the Project would not result in any new or increased significant impacts on air quality, including impacts related to health risks, that were not already analyzed in, and fully covered by, the previously certified EIR. Instead, because the Project would result in less development of the Site and would be subject to more stringent regulations (including improved truck emissions), all impacts on air quality would generally be reduced when compared to the impacts of the development and operation of the Site permitted by Original Project and assumed and analyzed in the EIR.

6.D. Biological Resources

	New Significant Impact	***More Severe Impacts***	***New Ability to Substantially Reduce Significant Impact***	***No Substantial Change from Previous Analysis***
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.)	☐	☐	☐	☒

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
through direct removal, filling, hydrological interruption, or other means?				
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

The EIR found that the Original Project had potentially significant impacts on Jurisdictional Waters/Wetlands. In order to reduce such impacts, the EIR proposed the following mitigation measures:

> 4.4.6.1A Prior to the issuance of grading permits for the affected areas, the project applicant shall provide evidence to the City that a Section 404 Permit from the ACOE, a Section 401 Permit from the RWQCB, and a Section 1602 Streambed Alteration Agreement from the CDFG [now CDFW] have been obtained for jurisdictional waters on each of the sites.
>
> 4.4.6.1B Prior to the issuance of grading permits for the affected areas, the project applicant shall compensate for the loss of jurisdictional resources by creating non-wetland waters of the U.S./Streambed as directed through consultation with the ACOE and the [CDFW].

The EIR concluded that after mitigation, the Original Project's impacts on jurisdictional resources would be reduced to a less than significant level. The EIR assumed the Site would be fully developed as part the Original Project, and the same Site would be developed by the Project's buildings. Additionally, as a result of offsite improvements required by the City, the Project will potentially impact the San Jacinto River from the construction of the Case Road Bridge, as well as the construction of the Ellis Avenue Drainage Channel, which will outlet to the San Jacinto River. In addition, required improvements to Ellis Avenue and Case Road will potentially impact jurisdictional ditches. While theses precise impacts to jurisdictional waters were not necessarily expressly identified in the EIR, these required improvements are nonetheless consistent with the offsite improvements that the EIR assumed would occur.

Further, after implementation of all of the mitigation required by the EIR, including all mitigation measures relating to potential impacts on jurisdictional waters – which require the Project to obtain all required permits from ACOE, the RWQCB, and CDFW prior to development (MM 4.4.6.1A) – the Project would not result in any significant impacts to biological resources generally, or to jurisdictional waters specifically. As a result, the Project would not result in any new or increased impact that was not already analyzed in, and fully covered by, the previously certified EIR.

The EIR also found that the Original Project would also result in potentially significant impacts on special status bird species, including the burrowing owl, California horned lark, and the loggerhead shrike. In order to reduce such impacts, the EIR imposed the following mitigation measures:

> 4.4.6.2A The clearance of vegetation within the BSA that supports special status species or protected avian species shall not occur within the typically avian nesting season (March 1 to June 30).
>
> 4.4.6.2B Access to proposed development sites shall be via existing routes, or shall be limited to the minimum extent/length required to provide safe and timely access. Known occupied burrows within the BSA, but outside the proposed development sites shall be avoided.
>
> 4.4.6.2.C No more than 72 hours prior to initiation of ground-disturbing activities, a pre-construction survey shall be completed by a qualified biologist. The survey will identify (if any) special status avian species within the area of intended disturbance. In the event no special status avian species are identified within the limits of disturbance, no further mitigation is required. In the event such species are identified within the limits of ground disturbance, Mitigation Measure 4.4.6.2.E shall apply.
>
> 4.4.6.2D No more than 72 hours prior to initiation of ground-disturbing activities, a pre-construction burrowing owl survey shall be completed by a qualified biologist for the planned disturbance area and a 500-foot (150-meter) buffer area. The pre-construction burrowing owl surveys may be conducted as part of the survey required in Mitigation Measure 4.4.6.2.C. A report detailing the findings of the pre-construction survey shall be submitted to the City prior to the initiation of ground-disturbing activities. In the event no burrowing owls have been identified within the limits of disturbance, no further mitigation is required. In the event burrowing owls are identified within the limits of ground disturbance, Mitigation Measures 4.4.6.2.E and 4.4.6.2.F shall apply.
>
> 4.4.6.2E If nesting special status avian species are determined to occupy a proposed area of disturbance, no construction activity shall take place within 500 feet of an active nest/burrow until it has been determined that the nest/burrow is no longer active, and all juveniles have fledged the nest/burrow.
>
> 4.4.6.2F If active burrowing owl burrows are detected outside the breeding season, then passive and/or active relocation may be approved following consultation with CDFG and/or USFWS. The installation of one-way doors may be installed as part of a passive

relocation program. Burrowing owl burrows shall be excavated with hand tools by a qualified biologist when determined to be unoccupied, and back filled to ensure that animals do not re-enter the holes/dens.

The EIR concluded that after mitigation, the Original Project's impacts on migratory bird species and non-listed special status avian species would be reduced to a less than significant level. The EIR assumed that the Site would be developed by the Original Project, which is the same Site would be developed by the Project, and in fact, the Project result in smaller building footprints. Accordingly, the Project would not result in any new or increased impacts on the special status species when compared to the Original Project or would otherwise result in any impacts not already analyzed in the EIR.

While the Project would not result in any new or increased significant impacts on biological resources, it is important to note that as a result of the proposed rail spur and other offsite improvements, including the Case Road Bridge widening, the Ellis Avenue Drainage Channel extension and construction, a proposed detention basin, and the proposed 7th Street Channel Trail, an amendment is required for the Joint Project Review (JPR 09-04-24-01) that covered the Original Project.

The rail spur would be constructed through APN 330-090-027, a portion of which is under a Conservation Easement (Conatser Conservation Easement) held by the Regional Conservation Authority (RCA) as part of the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) Reserve. The lands to be affected by the rail spur and the proposed Project's buildings are located within MSHCP Criteria Cell #3276. The Original Project has already complied with the Reserve Assembly through the RCA's Joint Project Review (JPR) process. However, because the property on which the rail spur is to be located is already conserved pursuant to the MSHCP, the loss of the lands as a result of the rail spur construction (and any other relevant offsite improvements) proposed by the Project applicant will need to be offset through conservation of additional lands. This is consistent with the conditions analyzed for the rail spur proposed under Plan B in the 2020 Addendum, which was ultimately approved by the City Council in June 2020. In fact, the rail spur proposed as part of the Project would be in the same location as proposed under Plan B, analyzed in the 2020 Addendum, and approved by the City Council on June 9, 2020. (*See,* Appendix 5, MSHCP Consistency Analysis to Support Amendment to JPR# 09-04-24-01, prepared by Glenn Lukos Associates, Inc. (April 2021))

The existing Case Road Bridge will also be improved as part of the Project, including the removal of the existing bridge over the San Jacinto River and the construction with a new, wider bridge. The footprint for the new bridge is located in the southeastern corner of Criteria Cell #3276. Since Case Road (including the bridge) is considered a Covered Activity as a roadway, the bridge improvements are not subject to Reserve Assembly. However, the bridge improvements are still subject to JPR to determine overall MSHCP consistency. (*See,* Appendix 5.) In addition, the impacts to the San Jacinto River (MSHCP riparian/riverine) must be approved through the Determination of Biologically Equivalent or Superior Preservation (DBESP) process.

The Project applicant will also construct a drainage channel along eastern edge of Redlands Avenue and along the northern edge of Ellis Avenue that will collect runoff from the Project itself and convey the runoff east to the San Jacinto River. The runoff will enter the river via a drain outlet that

will connect to the river at the terminus of the Ellis Avenue Drainage Channel. The eastern portion of the drainage channel is an offsite improvement that was not expressly a part of the Original Project, although the previously certified Original Project EIR anticipated and analyzed impacts from similar offsite improvements. The majority of the channel is located in Criteria Cell #3173. The proposed channel is located outside of the Ellis Avenue right-of-way and as not a Covered Activity under the MSHCP. As such, the construction of the channel is subject to JPR for Reserve Assembly and other aspects of MSHCP consistency. (*See*, Appendix 5.) The JPR for the Original Project identified 24 acres of proposed conservation in Cell #3173, to be located north of Ellis Avenue and south of the 7th Street Channel. The 24 acres of conservation will still be provided in this area. In addition to the impacts within Cell #3173, the proposed connection to the San Jacinto River would occur in Criteria Cell #3277. The Original Project did not identify any impacts within Cell #3277, but those new impacts will be addressed as part of the JPR amendment. (*Id.*)

The Project applicant will also construct a trail along the 7th Street Channel that will connect to a City-proposed trail at the San Jacinto River. The trail was not specifically included as part of the Original Project and so must be addressed as part of the JPR amendment, although the Original Project EIR anticipated and analyzed impacts from similar offsite improvements. (*Id.*) The eastern portion of the trail will extend through Cell #3173 and will form the northern boundary of the 24-acre conservation area.

The Project applicant will also construct a detention basin to the east of the Project's warehouses, as shown on Figure 1. The basin will drain to the proposed Ellis Avenue Drainage Channel. The detention basin will be located in Cell #3173 and will form the western boundary of the 24-acre conservation area. The detention basin was not specifically included as part of the Original Project and therefore will be addressed as part of the JPR amendment, although the Original Project EIR anticipated and analyzed impacts from similar offsite improvements. (*Id.*)

Additionally, as was the case for the previously approved Plan B and explained in the approved 2020 Addendum, the Project will permanently impact a portion of the drainage ditch that extends along the existing railroad alignment. In addition, as shown in Figure 2, the Project components will impact the San Jacinto River in two locations (Case Road Bridge and Ellis Avenue Drainage Channel connection) as well as roadside ditches along Ellis Avenue and Case Road. The applicant will be required to obtain all required permits from resource agencies (i.e., the USACOE, RWQCB, and/or CDFW, pursuant to Mitigation Measure 4.4.6.1A, above), as well as MSHCP approval. The applicant will be required to obtain all applicable resource agency permits prior to the development of improvements requiring such permits.

To offset the loss of conservation lands that would result from the rail spur, additional lands must be conserved at a minimum 1:1 ratio (depending on the relative conservation value of the lands to be impacted versus the proposed replacement lands). The replacement mitigation land must be located within 1) a portion of Criteria Cell #3276 not targeted for Reserve Assembly, or 2) either within portions of another Criteria Cell not targeted for Reserve Assembly, or 3) lands outside of a Criteria Cell but adjacent to the MSHCP Reserve that meet the same biological values and MSHCP Plan goals as the property that is under the Conservation Easement.

Accordingly, in the event the Project is approved, the City will impose a condition of approval requiring the project applicant to amend the original JPR with the RCA evaluating the lands to be

impacted by the rail spur compared with the proposed replacement lands meeting one of the three conditions outlined above, in addition to addressing the additional offsite components that were not expressly evaluated as part of the Original Project. The analysis will include biological information for the all relevant offsite improvements, including current vegetation mapping and results of applicable species surveys, the quantification and characterization of effects/benefits of the proposed Project on habitats, species and overall MSHCP Conservation Area design and function, including relationship to identified Core Areas, Linkages and Constrained Linkages, and other relevant information. (*See,* Appendix 5.)

All of the foregoing will be imposed on the Project through detailed City conditions of approval, as was the case in the City's 2020 approval of Plan B. In order to ensure the Project's compliance with the foregoing RCA and City requirements, the following additional mitigation measure is proposed for implementation of the Project as it pertains to the existing conserved lands:

> Prior to the issuance of grading permits, the project developer shall comply with the MSHCP Reserve Assembly requirements to the satisfaction of the City and the RCA either by providing replacement lands of equal or greater conservation value within Criteria Cell #3276, or by providing replacement lands of equal or greater value outside of Criteria Cell #3276 subject to approval through the Criteria Refinement process.

In addition to the Reserve Assembly requirements (i.e. replacement of the Conservation Easement land to be impacted by the rail spur), the implementation of the Project must demonstrate consistency with the species and habitat requirements of the MSHCP. Portions of the offsite improvements are located within the Narrow Endemic Plant Species Survey Area (NEPSSA), the Criteria Area Plant Species Survey Area (CAPSSA), and the burrowing owl survey area. The applicant's biologist, Glenn Lukos Associates, Inc. ("GLA") performed updated biological studies for the proposed rail spur and existing RCA Conservation Easement in 2020. (*See*, Appendix 5.) The vegetation communities within the rail spur include non-native grassland and disturbed alkali playa vegetation. Focused plant surveys identified two Criteria Area Plants, including the San Jacinto Valley crownscale (*Atriplex coronata* var. *notatior*) and smooth tarplant (*Centromadia pungens* ssp. *laevis*). Updated focused surveys will be performed in 2021 for the Project's other offsite components/improvements. If applicable species area detected and if the development of the Project cannot avoid at least 90 percent of areas with long-term conservation value for those species, then a Determination of Biologically Equivalent or Superior Preservation (DBESP) will be required, including mitigation to offset unavoidable impacts. All of the foregoing will be imposed on the Project through detailed City conditions of approval, when approving the proposed modification to the Original Project. In order to ensure the Project's compliance with the foregoing RCA and City requirements, the following additional mitigation measure is proposed for implementation of the Project as it pertains to sensitive plants:

> Prior to the issuance of grading permits, the project developer shall evaluate impacts to Narrow Endemic Plants and Criteria Area Plants with project specific MSHCP requirements. If required, the project developer will through the City/RCA submit a DBESP analysis to the Wildlife Agencies (U.S. Fish and Wildlife Service and California Department of Fish and Wildlife) for review and approval. Mitigation for impacts to rare

> plants such as San Jacinto Valley crownscale and smooth tarplant would consist of the translocation of plants via seed collection and soil salvage to an acceptable offsite mitigation area. The DBESP analysis will identify specific mitigation and monitoring protocols, including success criteria.

Focused burrowing owl surveys were performed in 2020 for the rail spur and burrowing owls were not detected during those surveys. Burrowing owl surveys are also being performed in 2021 for the additional offsite improvements described in detail in this Section 6.D, and shown on Figure 2. (*See,* Appendix 5.) As discussed above, the EIR already includes measures to address burrowing owls, including pre-construction burrowing owl surveys (measure 4.4.6.2D) and burrowing owl relocation (4.4.6.2F) if burrowing owls are detected during pre-construction surveys. Furthermore, since the parcel is currently part of the MSHCP Reserve, the relocation of burrowing owls must also be approved pursuant to a DBESP. The following additional mitigation measure is proposed for implementation of the Project as it pertains to burrowing owls:

> If the implementation of the Project will result in the relocation of burrowing owls, the project developer will through the City/RCA submit a DBESP analysis to the Wildlife Agencies (U.S. Fish and Wildlife Service and California Department of Fish and Wildlife) for review and approval.

Pursuant to Section 6.1.2 of the MSHCP, projects are required to evaluate impacts to MSHCP riparian/riverine areas and vernal pools, as well as certain species associated with riparian habitats and vernal pools and other seasonally ponded features, including the least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), western yellow-billed cuckoo (*Coccyzus americanus*), and listed fairy shrimp. The Project site and offsite improvement areas do not contain suitable riparian habitat with the potential to support the applicable birds, and no vernal pools, ephemeral pond habitat indicators, or fairy shrimp habitat was observed in focused surveys performed by GLA in 2020 and 2021. The results of these focused surveys are described in Appnedix 5, the MSHCP Consistency Analysis to Support Amendment to JPR# 09-04-24-01, prepared by Glenn Lukos Associates, Inc. (April 2021)

With the imposition of the proposed condition(s) of approval and mitigation measures, the Project would not result in any significant impacts on biology, and therefore will not result in any new or increased significant impacts on biological resources that were not already analyzed in, and covered by, the previously certified EIR.

6.E. Cultural Resources

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☐	☒
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	☒

The EIR disclosed and analyzed all potential impacts on cultural resources, including paleontological resources, historical resources, archaeological resources and human remains. The EIR disclosed that the Site was historically used for agricultural production, and there are no known cultural resources, but nonetheless assumed impacts were potentially significant and imposed the following mitigation measures:

> 4.5.5.1A In the event of the accidental discovery or recognition of any human remains on the project, the following steps shall be taken:
>
> • There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:
>
> o The coroner of the county in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required,
> and
> o If the coroner determines the remains to be Native American:
>
> - The coroner shall contact the NAHC within 24 hours.
> - The NAHC shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
> - The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, or
> - Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further and future subsurface disturbance pursuant to Public Resources Code Section 5097.98(e).

o The NAHC is unable to identify a most likely descendent.
o The most likely descendant is identified by the NAHC, fails to make a recommendation within 48 hours of being granted access to the site; or
o The landowner or his authorized representative rejects the recommendation of the descendant, and a mediation by the NAHC fails to provide measures acceptable to the landowner.

4.5.5.2A Prior to grading of the project site, the project developer shall hire a qualified archaeologist to provide cultural resource monitoring services at the project site. Selection of the archaeologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the site until the archaeologist has been approved by the City. During grading activities, the archaeologist shall monitor earth moving activities at the project sites consistent with Public Resources Code Section 21083.2(b), (c), and (d). The archaeologist shall be equipped to record and salvage cultural resources that may be unearthed during grading activities. The archaeologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. If the archaeologist identifies resources of a prehistoric or Native American origin, a Native American observer shall be added to the monitoring program and accompany the archaeologist for the duration of the grading phase. Any Native American resources shall be evaluated in accordance with the State CEQA Guidelines and either reburied at the project sites or curated at an accredited facility approved by the City of Perris. Once grading activities have ceased or the archaeologist determines that monitoring is no longer necessary, monitoring activities can be discontinued.

4.5.5.3A Prior to the issuance of grading permits, the project proponent shall submit to and receive approval from the City, a Paleontological Resource Impact Mitigation Program (PRIMP). The PRIMP shall include the provision of a trained paleontological monitor during on-site soil disturbance activities. The monitoring for paleontological resources shall be conducted on a half-time basis during the rough-grading phase of the project. In the event that paleontological resources are unearthed or discovered during excavation, Mitigation Measure 4.5.5.3C shall apply. Conversely, if no paleontological resources are unearthed or discovered on site during excavation, no additional mitigation is required.

4.5.5.3B The paleontological monitor shall be equipped to rapidly remove any large fossil specimens encountered during excavation. During monitoring, samples of soil shall be collected and processed to recover microvertebrate fossils. Processing shall include wet screen washing and microscopic examination of the residual materials to identify small vertebrate remains.

4.5.5.3C If paleontological resources are unearthed or discovered during excavation of the project site, the monitoring for paleontological resources shall be conducted on a fulltime basis for the duration of the rough-grading of the project site. The following recovery processes shall apply:

• Upon encountering a large deposit of bone, salvage of all bone in the area shall be conducted with additional field staff and in accordance with modern paleontological techniques.
• All fossils collected during the project shall be prepared to a reasonable point of identification. Excess sediment or matrix shall be removed from the specimens to reduce the bulk and cost of storage. Itemized catalogs of all material collected and identified shall be provided to the museum repository along with the specimens.
• A report documenting the results of the monitoring and salvage activities and the significance of the fossils shall be prepared.
• All fossils collected during this work, along with the itemized inventory of these specimens, shall be deposited in a museum repository (such as the Western Science Center or the Riverside Metropolitan Museum), for permanent curation and storage.

The Project's proposed buildings would not result in the development of property outside of the Site previously analyzed by the EIR (one of the three project sites analyzed therein). In other words, the Project calls for development of the same land previously analyzed by the EIR. The Project would also subject to all of the mitigation measures set forth above. While the rail spur (and potentially other offsite improvements) would extend over property located between Ellis Avenue and Case Road outside of the Original Project site, because (1) there is no evidence or other reason to believe cultural resources exist in the area outside of the Original Project site that would be impacted (which, just like the remainder of the Site, was historically used for agricultural uses and no known cultural resources exist), and (2) all the same mitigation measures set forth above will be implemented by the Project for all areas disturbed by its development, including all offsite improvements, to ensure that there will be no significant impacts on cultural resources. The approved 2020 Addendum came to this same conclusion, based on the same analysis.

Accordingly, the Project would not result in any new or increased significant impacts on cultural resources that was not already analyzed in, and covered by, the previously certified EIR.

6.F. Energy

	New Significant Impact	***More Severe Impacts***	***New Ability to Substantially Reduce Significant Impact***	***No Substantial Change from Previous Analysis***
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

The Project includes the same type of industrial warehouse uses approved for the Original Project, and would result in the construction and operation of less square footage than was approved for the Original Project. As a result, the Project would use less energy than the Original Project, and would result in less impacts analyzed in the EIR. As part of its global climate change analysis in Section 4.3 (Air Quality), the EIR concluded that the Original Project would not result in any significant impacts related to inefficient, wasteful or necessary consumption of energy. Because the Project would use less energy than the Original Project – and would be subject to more strict regulations regarding energy usage than existed when the Original Project was approved and the EIR was certified – that conclusion would not change.

Accordingly, the Project would not result in any new or increased significant impacts on energy that were not already analyzed in, and fully covered by, the previously certified EIR. Instead, the Project would reduce impacts on energy when compared to the Original Project.

6.G. Geology and Soils

	New Significant Impact	***More Severe Impacts***	***New Ability to Substantially Reduce Significant Impact***	***No Substantial Change from Previous Analysis***
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☐	☒
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ?	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☐	☒
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

The EIR concluded that, based on the Initial Study prepared by the City and attached to the EIR as Appendix A, all of the Original Project's impacts on geology and soils were less than significant without mitigation, and did not warrant detailed discussion in the EIR.

The Project's buildings would not result in the development of property outside of the exact same Site previously analyzed by the EIR (one of the three project sites analyzed therein). In other words, the Project calls for development of the same land previously analyzed by the Initial Study and EIR, and therefore, no new, different or increased impacts related to geology and soils would result from development of the same land/soil. Further, the Project would result in less development of the Site that the Original Project, which would generally reduce impacts on geology and soils.

Additionally, state Building Codes and other applicable regulatory requirements with which the Project must comply with have been strengthened to be more protective against earthquakes and other seismic activity since the time the EIR was certified, which again, indicate that impacts related to geology and soils will be reduced when compared to the impacts of the Original Project assumed by the Initial Study/EIR.

Accordingly, the Project would not result in any new or increased significant impacts on geology and soils that were not already analyzed in, and fully covered by, the previously certified EIR.

6.H. Greenhouse Gas Emissions

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

While located within the air quality section, the EIR nonetheless disclosed and analyzed the Original Project's potential impacts related to greenhouse gas ("GHG") emissions in the "Global Climate Change" subsection.

Limiting GHG emissions to combat climate change has been a governmental goal since the late 1970s. The regulation of GHGs ramped up in the 1990s – the United Nations Framework convention on Climate Change was signed in 1992, a 1995 meeting in Berlin defined a structure for further action, the Kyoto Protocol on Global Warming was executed in 1997. Under these agreements, many countries, including the United States, have pledged to lower GHG emissions. Since the 1990s, California's local governmental agencies have been well aware of the importance of monitoring and limiting GHG emissions when approving projects.

Executive Order ("EO") S-3-05 (June 2005) established the following statewide goals: GHG emissions should be reduced to 2000 levels by 2010, GHG emissions should be reduced to 1990 levels by 2020, and GHG emissions should be reduced to 80% below 1990 levels by 2050. In furtherance of the goals established in EO S-3-05, the Legislature enacted Assembly Bill ("AB") 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. Under AB 32, the California Air Resources Board ("CARB") is responsible for and is recognized as having the expertise to carry out and develop the programs and requirements necessary to achieve the GHG emissions reduction mandate of AB 32. Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions from specified sources.

Senate Bill 375 (2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 required the CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035. Regional metropolitan planning organizations are then responsible for preparing a Sustainable Communities Strategy within their Regional Transportation Plan. The goal of the Sustainable Communities Strategy is to establish a forecasted development pattern for the region that, after

considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets.

In connection with the EIR, URS Corporation completed an Air Quality Impact Report, which including a Greenhouse Gas Analysis that was attached to and incorporated in the EIR as Appendix C-2. That analysis concluded that the Original Project would result in direct and indirect emissions of 192,637 metric tons of CO_2e per year. Accordingly, the EIR concluded that potential significant impacts on GHG emissions may result from implementation of the Original Project. In order to reduce the potential GHG emissions resulting from implementation of the Original Project and in addition to other mitigation measures identified herein, the EIR imposed the following mitigation measures:

4.3.7.5A As part of the building plan approval, the project proponent shall include water conservation and efficiency measures. Water conservation and efficiency measures may include (but are not limited to):

- Creation of water-efficient landscapes;
- Installation of water-efficient irrigation systems and devices such as soil moisture-irrigation controls;
- Use of reclaimed water for landscape irrigation in new developments and on public property including the installation of infrastructure to deliver and use reclaimed water;
- Design buildings to be water-efficient including the installation of water-efficient fixtures and appliances;
- Restricting water methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff;
- Implementing low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment; and
- Devising a comprehensive water conservation strategy appropriate for the project and location. The strategy may include many of the specific items listed above, plus other innovative measures that are appropriate to the specific project.

4.3.7.5B As part of building plan approval, the project proponent shall include solid waste reduction measures. Solid waste reduction measures may include (but are not limited to):

- Reuse and recycle of construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard); and
- Provision of interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas.

4.3.7.5C As part of building plan approval, the project proponent shall implement all applicable design features identified in Table 4.3.EE and 4.3.HH which include:

- Recycling and/or salvaging 75 percent of nonhazardous construction and demolition waste, and developing and implementing a construction waste management plan;
- Providing an easily accessible area that serves the entire building and is dedicated to the collection and storage of non-hazardous materials for recycling;
- Reducing the potable water consumption for irrigation by 50 percent;
- Maximizing water efficiency within the project resulting in a 30 percent reduction of water use, excluding irrigation, than the baseline after meeting Energy Policy Act of 1992 guidelines for fixture performance;
- Optimizing energy performance and achieving a 30 percent reduction in energy use;
- Providing preferred parking for low-emitting and fuel efficient vehicles for 5 percent of total vehicle parking;
- Providing secure bike racks or storage for 3 percent or more of all building users; and
- The project involves the use of a light colored coating for the building rooftop.

Even with the implementation of the proposed mitigation measures, the EIR found that it was not possible to quantify the reduction in the amount of greenhouse gases that may occur from implementation of these measures on the Original Project. The EIR found that the Original Project was consistent with strategies to reduce California's emissions consistent with EO S-3-05, and that the project specific incremental contribution to climate change at the project level would be less than significant with implementation of all the mitigation measures. However, even with implementation of the mitigation, the operational emissions of VOC, CO, and NOx, would continue to exceed the daily regional thresholds of significance recommended by the SCAQMD. Thus, the EIR concluded that the Original Project contribution to Statewide greenhouse gas impacts are cumulatively considerable, and remained a cumulatively considerable impact.

The Project would not increase the GHG emissions the EIR assumed would be generated by the construction and operation of the Original Project on the Site. The Project would not result in construction and operation of less square footage than the EIR assumed would be constructed and operated on the Site, which both reduces construction and operation GHG emissions in of itself. The decreased square footage also further reduces GHG emissions by correspondingly reducing the amount of trips generated by the Project when compared with the Original Project and the traffic impacts that the EIR assumed would be generated, as set forth in Appendix 2. Additionally, the proposed Project's rail spur will even further reduce emissions from project-related traffic when compared to the Original Project and the EIR's analysis of the same, although this Addendum does not rely on such a reduction to reach the conclusions set forth herein. The Project would also be required to implement applicable mitigation imposed by the EIR, set forth above.

Additionally, mandatory regulatory requirements regarding operation of industrial facilities and vehicles, including trucks, which will apply to the Project, have become much more strict since the EIR was certified (like many regulations aimed at protecting the environment). This will result in an even further reduce GHG emissions resulting from the Project when compared to the

GHG emissions that the EIR assumed would result from the Original Project under then-existing regulations.

The long-term operational GHG emissions from the Project were modeled using CalEEMod™ version 2016.3.2 program based on the land use and traffic assumptions evaluated in Traffic Impact Analysis and the VMT Analysis attached hereto as Appendices 2 and 3. (*See*, Appendix 1, Air Quality Analysis (Albert A. Webb Associates, March 2020).) The GHG analysis for the Project utilized the land use and traffic information and data provided in this Addendum and specific Section 6.Q (Transportation) herein, and the same assumptions and methodology as the Original Project evaluated in the EIR, with the following exceptions:

- The operational year selected was 2022.
- The carbon intensity was adjusted to reflect the 33 percent renewable energy required of utility providers by 2020.
- The energy-related emissions were adjusted to reflect the improvements expected from 2019 Title 24 standards, which become effective January 1, 2020 and are anticipated to be 30 percent more efficient.[2]
- The City's most recently reported solid waste diversion rate of 51% was used.
- CalEEMod has the capability of estimated the amount of CO_2e emissions sequestered from planting trees. Therefore, the number of trees estimated on the Conceptual Landscape Plan were modeled and the associated reduction in GHG emissions was included.

As shown in Table 6.H.1, GHG Emissions Comparison, the Project would generate fewer GHG emissions than the Original Project evaluated in the EIR. Therefore, the Project's GHG impacts would be less than the impacts of the Original Project disclosed and evaluated in the previously certified EIR.

Table 6.H.1, GHG Emissions Comparison

Emissions Category[1]		**Certified EIR Project[2]**	**Modified Project [2]**
		$MTCO_2e$/yr	**$MTCO_2e$/yr**
One-Time Emissions	Vegetation[3]	0	-763.93
	Annualized One-Time Emissions[4]	***0***	***-25.46***
Operational Emissions	Area Sources	0	0.08
	Energy Usage	49,470.91	1,827.80
	Mobile Sources[5]	142,491.00	22,001.63
	Solid Waste	2.23	658.04

[2] The 2019 Title 24 standards are 7 percent more efficient for residential uses and 30 percent more efficient for non-residential uses than the 2016 standards in CalEEMod: https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf

Emissions Category[1]		Certified EIR Project[2]	Modified Project [2]
		$MTCO_2e/yr$	$MTCO_2e/yr$
	Water	673.43	237.68
	Operational Emissions	***192,637.57***	***24,725.23***
Total[6]		**192,637.57**	**24,699.77**

Source: **Appendix 1** – CalEEMod Output.

Notes:

[1] One-time emissions (i.e., construction and vegetation) and operational emissions for Plan A and Plan B were calculated using CalEEMod™ v.2016.3.2. GHG emissions for the Certified EIR Project from Tables 4.3.2 and 4.3-AA through 4.3-DD.

[2] Emissions are presented as CO_2e, which include CO_2, CH4, and N_2O emissions, weighted by their respective global warming potentials.

[3] A net sequestration of carbon results in a decrease (or negative) in CO_2e emissions.

[4] One-time emissions were amortized over a 30-year period per SCAQMD recommendations.

[5] For the Certified EIR Project, annual mobile emissions also include the emissions from natural gas combustion. Natural gas emission are included in the Energy Usage for the Project.

[6] Sum of annualized one-time emissions and operational emissions.

Accordingly, the Project would not result in any new or increased significant impacts resulting from GHG emissions that were not already analyzed in, and fully covered by, the previously certified EIR. Instead, because the Project would result in less development of the Site and would be subject to more stringent regulatory requirements, impacts from GHG emissions would generally be reduced from the impacts of the Original Project.

6.I. Hazards and Hazardous Materials

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

The EIR disclosed and analyzed all the potential impacts of the Original Project related to hazardous and hazardous materials, and found that the only potentially significant impacts relate to the Original Project's location within the Airport Compatibility Zone of the Perris Valley Airport and within the vicinity of the March Air Force Reserve Base ("MARB"). Following a May 14, 2009 Riverside County Airport Land Use Commission ("ALUC") hearing, the ALUC determined that the Original Project was consistent with the applicable Airport Land Use Plan ("ALUP"), and the EIR concluded the same, subject to certain conditions. Those conditions were incorporated into the EIR as mitigation measures, as follows:

> 4.6.6.1A Prior to recordation of a final map, the issuance of building permits, or conveyance to an entity exempt from the Subdivision Map Act for Phase 3, whichever occurs first, the landowner of the project site shall convey an avigation easement to the

MARB/MIP Airport or provide documentation to the City of Perris and the Airport Land Use Commission that such conveyance has previously been recorded.

4.6.6.1B Prior to the issuance of building permits for each phase, the project proponent shall provide evidence to the City through submittal of a lighting plan that any outdoor lighting shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky and that all outdoor lighting is downward facing.

4.6.6.1C Prior to the issuance of building permits for each phase, the project proponent shall provide evidence to the City through submittal and agreement of additional conditions of approval that the following uses shall be prohibited on site:

- Any use which would direct a steady light or flashing light of red, white, green or amber colors associates with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.
- Any use which would cause sunlight to be reflected toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport.
- Any use which would generate smoke or water vapor, or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area.
- Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.

4.6.6.1D Prior to the issuance of building permits for Phase 1, the applicant shall submit a Notice of Proposed Construction of Alteration (Form 7460-1) to the Federal Aviation Administration (FAA) for each building with an elevation at top point exceeding 1,427 feet AMSL and shall have received a determination of "No Hazard to Air Navigation" from the FAA. Copies of the FAA determination shall be provided to the City of Perris Planning Department and the Riverside County Airport Land Use Commission.

4.6.6.1E Prior to the issuance of building permits for Phase 3, the applicant shall submit a Notice of Proposed Construction of Alteration (Form 7460-1) to the Federal Aviation Administration (FAA) for each building with an elevation at top point exceeding 1,424 feet AMSL and shall have received a determination of "No Hazard to Air Navigation" from the FAA. Copies of the FAA determination shall be provided to the City of Perris Planning Department and the Riverside County Airport Land Use Commission.

4.6.6.1F Prior to issuance of grading permits for each phase, the project proponent shall provide evidence to the City that the proposed on-site detention basins have been designed and engineered so as to provide for a maximum 48-hour detention period after the design storm and to remain totally dry between rainfalls. If this criterion cannot be

met, then Mitigation Measure 4.6.6.1G shall apply. Conversely, if this criterion can be met, Mitigation Measure 4.6.6.1G shall not be applicable.

4.6.6.1G The project proponent, in consultation with the owner-operator of Perris Valley Airport, shall contract with a wildlife biologist qualified to conduct Wildlife Hazard Assessments for the preparation of a Wildlife Hazard Management Plan (WHMP). Mitigation measures identified in the WHMP shall be adhered to.

4.6.6.1H Prior to the issuance of occupancy permits for each phase, the project proponent shall provide evidence to the City that vegetation proposed for in and around the proposed detention/retention basins does not provide food or cover for bird species that would be incompatible with airport operations.

4.6.6.1I Prior to the transfer of any real property or the finalization of a lease agreement for property within each of the phases, the transferor (or leaser) shall provide to the transferee (or lessee), notification required by Condition 4 of the Riverside County Airport Land Use Commission's consistency determination dated May 14, 2009.

The EIR concluded that after these mitigation measures are implemented, the Original Project's impacts associated with airport hazards would be reduced to less than significant levels. As stated above, the EIR also concluded that all of the Original Project's other impacts related to hazards and hazardous materials would be less than significant without mitigation. It bears noting that while Phase 1 of the Original Project is entirely inside Airport Compatibility Zone D, the Site being analyzed here (Phase 3) is only partially within any Airport Compatibility Zone, and mostly in Zone E, which is less restrictive than Zone D (only 32.51 acres of the Site are in Zone D).

The Project would not construct buildings in areas that the EIR did not already assume would be developed as part of the Original Project's development of the Phase 3 Site, and therefore the Project would not be in closer proximity to any airport or within any airport compatibility zone not previously analyzed in the EIR, nor would the Project disturb any hazardous materials on site or otherwise result in any impacts on hazards and hazardous materials that were not already analyzed in the EIR, as the exact same Site is being developed as was assumed by the EIR under the Original Project. Further, part of the standard process for development within airport Influence Areas for MARB, proposed projects are required to be reviewed by the ALUC for consistency with the Riverside County Airport Land Use Plan ("RCALUP"), On April 9, 2020, the ALUC determined both projects analyzed in the 2020 Addendum are consistent with the ALUP, subject to conditions identified in the staff report. The Project will also be analyzed by the ALUC, it is expected that this same determination will be made, considering the similarities to the projects analyzed in the 2020 Addendum, as well as the reduction in development when compared to the Original Project. Accordingly, the Project will implement all of the mitigation measures under the EIR as well as any additional conditions of approval required by ALUC. After implementation of these measures, the conclusion for the Project will be the same as the EIR – all impacts associated with hazards will be reduced to less than significant levels after mitigation.

Further, the uses permitted by the Project would be the same uses as analyzed under the Original Project – industrial warehouse – only less intense, and no additional hazardous materials would be used as part of these uses, other than those already assumed in the EIR that would result from the Original Project. As explained in the 2020 Addendum, the introduction of a rail spur does not change this analysis because there was a rail spur analyzed previously for Phase 2 of the Original Project, and all other impacts related to hazards and hazardous materials would remain less than significant.

Accordingly, the Project would not result in any new or increased significant impacts resulting from hazards and hazardous materials that were not already analyzed in, and fully covered by, the previously certified EIR.

6.J Hydrology and Water Quality

	New Significant Impact	***More Severe Impacts***	***New Ability to Substantially Reduce Significant Impact***	***No Substantial Change from Previous Analysis***
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☐	☒
i. result in substantial erosion or siltation on- or off-site;	☐	☐	☐	☒
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☒
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
iv. impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Construction-Related Water Quality Impacts

The EIR identified potentially significant construction-related water quality impacts from the development of the Original Project. The impacts identified in the EIR included temporary disturbances of surface soils and removal of vegetative cover which could potentially result in erosion and sedimentation on site. Accordingly, the EIR implemented several mitigation measures, which were as follows:

4.7.6.1A Prior to the first issuance of a grading permit by the City for each phase of the proposed project, the project applicant shall file a Notice of Intent (NOI) with the Santa Ana Regional Water Quality Control Board to be covered under the State National Pollutant Discharge Elimination System (NPDES) General Construction Permit for discharge of stormwater associated with construction activities.

4.7.6.1B Prior to the first issuance of a grading permit by the City for each phase of the project, the project applicant shall submit to and receive approval from the City of Perris a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP shall include a surface water control plan and erosion control plan citing specific measures to control on-site and off-site erosion during the entire grading and construction period. In addition, the SWPPP shall emphasize structural and nonstructural best management practices (BMPs) to control sediment and non-visible discharges from the site. Some of the BMPs to be implemented 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 wattle and temporary debris basins (if deemed necessary), and other discharge control devices. The construction and condition of the BMPs would be periodically inspected during construction, and repairs would be made when necessary as required by the SWPPP.
- All materials that have the potential to contribute non-visible pollutants to stormwater must not be placed in drainage ways and 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 in a reasonable manner to eliminate any discharge from the site. Stockpiles would be surrounded by silt fences and covered with plastic tarps.
- The SWPPP would include inspection forms for routine monitoring of the site during the construction phase to ensure NPDES compliance.
- Additional BMPs and erosion control measures would be documented in the SWPPP and utilized if necessary.
- The SWPPP would 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 would provide equivalent or superior treatment either on site or off site.

4.7.6.1C 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 in for the SWPPP. Monthly reports shall be maintained by the Contractor and also available for City inspection. In addition, the Contractor would also be required to maintain an inspection log and have the log on site available for review by the City of Perris and the representatives of the Regional Water Quality Control Board.

The EIR concluded that adherence to the BMPs mandated by the mitigation measures would reduce impacts associated with the Original Project's short-term stormwater discharge to less than significant levels. The Project, which would involve similar construction activities on the same building Site analyzed in the EIR, will be required to comply with these mitigation measures/BMPs and all other applicable regulatory requirements, and therefore impacts would also be less than significant.

Operational-Related Water Quality Impacts

The EIR also identified potentially significant water quality impacts from the operation of the Original Project. Specifically, the EIR disclosed that upon development of the on-site uses proposed by the Original Project, storm runoff from the roadways, parking lots, and commercial buildings can carry and be tainted by various pollutants such as sediment, petroleum products, construction materials, landscaping chemicals, and trace metals.

The EIR noted that adherence to the Water Quality Management Plan ("WQMP") requirements is required of all development within the City. In addition to these WQMP requirements, the EIR proposed the following mitigation measure:

4.7.6.2A Prior to the first issuance of a permit by the City (which includes the issuance of grading permits and building permits) for each phase, the project applicant shall be required to finalize the preliminary WQMP prepared for the project and receive approval from the City of Perris of the project-specific Final Water Quality Management Plan (WQMP) for each component of the proposed project. The Final WQMP shall specifically identify pollution prevention, source control, treatment control measures, and

other BMPs that shall be used on the site to control predictable pollutant runoff in order to reduce impacts to water quality.

After implementation of the foregoing mitigation measure, and because adherence to the regulatory requirements identified in the WQMP would be required by the City during the operational phase of the Project, the EIR concluded the Original Project's potential water quality impacts resulting from stormwater and urban runoff would be reduced to a less than significant level. The Project – which would involve similar (and less intense) industrial operations on the same Site analyzed in the EIR – would be required to comply with the same mitigation measures and all other applicable regulatory requirements, including the WQMP, and therefore all impacts would also be less than significant.

100-Year Flooding Hazard-Related Impacts

As requested by Riverside County Flood Control, the EIR discussed impacts related to the Project floodway and floodplain. The EIR identified potentially significant impacts resulting from (among other things), the Site's location within a 100-year floodplain as mapped by the Federal Emergency Management Agency ("FEMA") and its location adjacent to the San Jacinto River. The EIR observed that flooding in the City could result in rapid runoff through the failure of dams. In order to reduce these impacts, the EIR imposed the following mitigation measures:

4.7.6.3A Prior to the issuance of grading permits for each phase of the project, the project proponent shall submit evidence to the City that all requirements identified in Chapter 15.09 (Floodplain Management) of the City's Municipal Code have been fulfilled to the City floodplain administrator's satisfaction.

4.7.6.3B Prior to the issuance of grading permits for Phase 2 and Phase 3, the project applicant shall submit to the City supporting evidence of compliance with FEMA CLOMR-F specifications and requirements including the discussion and analysis of fill material placement, elevation changes, and hydro-modification impacts.

The EIR concluded that after these mitigation measures are implemented, the Original Project's impacts relating to flooding and hydromodification would be reduced to less than significant levels.

The Project would develop the same Site analyzed in the EIR, and would be required implement the same mitigation measures adopted in the EIR. Thus, like the Original Project, the Project would not result in a significant impact relating to flooding hazards.

Accordingly, the Project would not result in any new or increased significant impacts relating to hydrology or water quality that were not already analyzed in, and fully covered by, the previously certified EIR. In fact, because the Project would result in less development, it is likely it would result in less impacts to hydrology or water quality when compared to the Original Project.

6.K Land Use

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

The EIR concluded the Original Project would not cause a significant impact on land use and planning. As discussed in the EIR, though implementation of the Project would represent establishment of new land uses on the Site, the character and overall intensity of the proposed development was determined to be consistent with and comparable to existing land uses within the City and Project vicinity. The Original Project involved the approval of a General Plan amendment, specific plan amendment, and zone change to permit industrial warehouse use on the Site. Furthermore, the EIR concluded that the Original Project would not conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Thus, the EIR did not propose any mitigation measures, and concluded that all impacts were less than significant.

The Project applicant proposes the exact same uses on the Site as the Original Project – tilt up warehouse buildings – and as such, the Project is consistent with and comparable to existing land uses within the City and vicinity of the Site. Indeed, when the City approved the Original Project, it approved the General Plan amendment, specific plan amendment, and zone change that allows the uses proposed by the Project – in other words, the proposed uses are already permitted on the Site, without the need for further legislative approvals. Furthermore, just like the Original Project, the Project would not conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, even without mitigation, the Project would not cause a significant impact on land use and planning, the same conclusion reached in the EIR.

Accordingly, the Project would not result in any new or increased significant impacts relating to land use that were not already analyzed in, and fully covered by, the previously certified EIR. In fact, because the proposed warehouse uses are already permitted on the Site, impacts to land use from the Project are actually reduced when compared to the Original Project.

6.L Mineral Resources

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

The EIR concluded that, based on the Initial Study prepared by the City and attached to the EIR as Appendix A, all of the Original Project's impacts on mineral resources were less than significant without mitigation, and did not warrant detailed discussion in the EIR. There is no evidence of any mineral resources underlying the Site, or in the surrounding areas.

The Project would not result in the development of property outside of the same Site previously analyzed by the EIR (one of the three project sites analyzed therein), nor is there any evidence that any aspect of the Project would have an impact on mineral resources, including the rail spur and other offsite improvements. Therefore, there would be no new, different or increased impacts related to mineral resources resulting from the development of the same exact land.

Accordingly, the Project would not result in any new or increased significant impacts on mineral resources that were not already analyzed in, and fully covered by, the previously certified EIR.

6.M Noise

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
Would the project result in::				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise	☐	☐	☐	☒

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
ordinance, or applicable standards of other agencies?				
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The EIR identified both short and long term noise impacts resulting from construction and operation of the Original Project. In the short term, the EIR concluded that construction would cause a temporary increase in noise, but all impacts related thereto would nonetheless be less than significant. Construction noise from the Project would similarly be less than significant, as under either Plan, there would be less construction activities (and less total square footage constructed) than the EIR assumed would occur on the Site as the result of the construction of the Original Project.

Long-Term Operational Noise Impacts

The EIR identified increased long term noise levels that would result from the Original Project, and determined that project operation would result in noise levels at the closest sensitive receptors exceeding the maximum exterior and interior noise level allowed. As identified in the EIR, the Original Project's proposed warehouse uses would generate noise from truck delivery, loading/unloading activities at loading areas, and other noise-producing activities within the parking lot. The EIR proposed the following measures to mitigate these long term impacts:

4.9.6.1C Prior to the issuance of occupancy permits for Phase 3, the project proponent shall provide evidence to the City that a 12-foot high noise barrier shall be constructed on the Phase 3 site. The west portion of the noise barrier shall extend at a minimum, half the distance of the western trailer parking area for Building C. The southern portion of the noise barrier shall extend across the entire width of the trailer parking dock area to connect with the west face of Building C. In addition, an 8-foot high noise barrier shall be constructed on the Phase 3 site along the west and north sides of the trailer parking area on the west side of Building B.

4.9.6.1D Prior to the issuance of occupancy permits for any phasing, the project proponent shall provide evidence to the City that the noise barriers have a surface density

of at least 3.5 pounds per square foot and have no openings or gaps. The noise barriers shall be constructed using an earthen berm, a free standing wall, or a combination of these two methods. The free standing wall shall be constructed from decorative block material. The access gates shall be solid barriers, as opposed to wrought iron fences, and must have a surface density of at least 3.5 pounds per square foot and have no openings or gaps. The access gates can be constructed using 13 gauge sheet steel, 3/8" glass, 5/8" Plexiglas, 1 ¼" plywood, or a combination of these materials.

The EIR concluded that after these mitigation measures are implemented, the Original Project's long-term operational impacts on noise levels at the closest sensitive receptors would be reduced to less than significant levels. The Project would be required to implement these same mitigation measures. Further, the Project would result in the operation of less square footage of the same industrial warehouse uses analyzed in the EIR, and therefore noise levels from operation of the Project would generally be less than the noise levels that the EIR assumed would be generated by the development of the Original Project on the Site, particularly considering that the Project would result in less traffic generation than the Original Project, thereby reducing mobile source noise. (*See*, Appendix 2.)

Long-Term Rail Noise Impacts

The EIR also analyzed noise impacts from potential rail service as part of the operation of Phase 2 of the Original Project. As identified in the City's General Plan EIR, the City aims to reduce exterior and interior noise levels to no more than 65 dBA CNEL and 45 dBA CNEL for sensitive land uses. Accordingly, the proposed the following mitigation measures:

4.9.6.2A Prior to the issuance of occupancy permits for Phase 2, the project proponent shall coordinate with the City in the formation of a Quiet Zone along the proposed 11th Street and Mapes Road at-grade crossings. The project proponent and the City shall engage in the process of creating a Quiet Zone which includes but is not limited to the following actions:

- Provision of a written Notice of Intent to Establish a Quiet Zone to the Federal Railroad Administration, California Public Utilities Commission, and the railroad carrier operating over the impacted right-of-way; and
- Provision of evidence to the Federal Railroad Administration and the California Public Utilities Commission that the at-grade crossings meet all safety criteria for establishing a quiet zone.

The EIR concluded that after these mitigation measures are implemented, the Original Project's impacts on noise levels as a result of rail service to a portion of the Project would be reduced to less than significant levels.

As mentioned above, and like Plan B analyzed in the 2020 Addendum, the Project includes the development of a rail spur and operation of train service to the Site. While the EIR analyzed noise levels from rail service to the Phase 2 site, the same analysis applies to the Site here, as the same noise levels would be generated by a rail spur, regardless of where it is located. In fact, as shown in Figure 4.9.1 of the EIR, there are actually less sensitive receptors near the Site than the

Phase 2 site, meaning that impacts would actually be less than the impacts disclosed and analyzed in the EIR. Finally, to the extent applicable, the same Mitigation Measure 4.9.6.2A regarding Quiet Zone would be imposed on the Project, as well as Mitigation Measure 4.3.6.6E set forth above, regarding a complaint line. As a result, and as concluded in the approved 2020 Addendum, all noise impacts related to rail construction and operation would remain less than significant.

Accordingly, the Project would not result in any new or increased significant impacts relating to noise that were not already analyzed in, and fully covered by, the previously certified EIR. In fact, because less square footage of the same warehouse uses analyzed by the EIR would be developed by the Project when compared to the Original Project, noise generation levels and resulting noise impacts are generally reduced when compared to the Original Project. This is true for noise levels from construction, on-site operation, and off-site traffic / mobile noise sources generated by the Project, which are all reduced as a result of the reduced square footage proposed by the Project.

3.N Population and Housing

	New Significant Impact	***More Severe Impacts***	***New Ability to Substantially Reduce Significant Impact***	***No Substantial Change from Previous Analysis***
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

The EIR concluded that, based on the Initial Study prepared by the City and attached to the EIR as Appendix A, all of the Original Project's impacts on population and housing were less than significant without mitigation, and did not warrant detailed discussion in the EIR. As concluded therein, the Original Project involves the development of industrial uses, and as such would not result in substantial unplanned growth or the demolition of existing housing.

The Project consists of the same warehouse uses proposed by the Original Project, and would not result in the development or otherwise impact property outside of the same Site previously analyzed by the EIR, which previously consisted of agricultural uses, not housing. The Project would add employment in similar numbers as the Original Project, but as concluded in the EIR, it would not be enough to induce substantial growth. The Project does not include the

development new homes, and there is enough existing housing in the City and surrounding areas for the Project's future employees.

Accordingly, the Project would not result in any new or increased significant impacts on population and housing that were not already analyzed in, and fully covered by, the previously certified EIR.

6.O Public Services/Utilities

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
Would the project:				
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	☐	☐	☐	☒
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

The EIR concluded the Original Project would not cause significant impacts on public services because the development of industrial uses would not induce substantial population growth, and therefore would not cause fire or police staffing or equipment to operate at a deficient level of service. Additionally, the EIR noted that at the development of each site, the applicant will be

required to pay development impact fees to fund future fire and police facilities and services. Similarly, because the Original Project does not involve the development of housing, it would have a less than significant impact on schools, parks and other public services, the need for which is generated by new housing developments, not new industrial developments. Accordingly, impacts associated with public services for the proposed project were determined to be less than significant and no mitigation was required.

The Project would also result in less than significant impacts on all public services. The proposed use remains industrial/warehouse, and does not result in the development of residential uses, nor does the Project add enough jobs to induce residential development in the area. Further, the Project is not more susceptible to risks requiring additional police or fire services than the Original Project, and instead, the Project would result in less square footage developed than the Original Project, generally lessening the demands on public services. Finally, as was the case with the Original Project, the applicant here will be required to pay development impact fees to fund future services and facilities. Thus, no significant impact related to increased demand on any public services or facilities would result from the proposed Project.

Accordingly, the Project would not result in any new or increased significant impacts relating to public services that were not already analyzed in, and fully covered by, the previously certified EIR.

6.P Recreation

	New Significant Impact	***More Severe Impacts***	***New Ability to Substantially Reduce Significant Impact***	***No Substantial Change from Previous Analysis***
Would the project:				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

The EIR concluded that, based on the Initial Study prepared by the City and attached to the EIR as Appendix A, all of the Original Project's impacts on recreation were less than significant without mitigation, and did not warrant detailed discussion in the EIR. The Original Project does not propose residential uses, and as a result, would not increase usage of City parks or require construction of new parks.

Like the Original Project, the Project proposed entirely industrial warehouse uses, and therefore does not result in the development of residential uses, nor would the Project add enough jobs to induce residential development in the area. Further, the Project would result in less square footage being development than permitted by the Original Project, making any demands for recreation that did result less than those resulting from the Original Project.

Accordingly, the Project would not result in any new or increased significant impacts on recreation that were not already analyzed in, and fully covered by, the previously certified EIR.

6.Q Transportation

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
Would the project:				
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)	☐	☐	☐	☒
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☐	☒

Albert A. Webb Associates performed Trip Generation Analysis ("TIA") for the Project, which is attached to this Addendum as Appendix 2, and incorporated herein by this reference. In order to be conservative and assume the maximum possible impacts, the TIA does not account for rail when analyzing trip generation rates, and therefore likely forecasts a higher trip generation rate than would in fact occur for the Project, because if rail is implemented as proposed, the traffic generated by the Project would be further reduced. The TIA calculates trip generation numbers for both the Original Project and the Project using the 2017 ITE Manual and 2016 ITE Warehouse Study. Calculations are provided in both passenger-car equivalents ("PCE") and raw trip numbers, per PCE factors provided by the San Bernardino County Transportation Authority ("SBCTA").

In analyzing the original project, the EIR used the 2007 National Association of Industrial and Office Properties ("NAIOP") trip generation study to forecast trip rates. However, in order to

generate an accurate trip comparison while using the most current trip rate assumptions, the TIA applies the 2017 ITE Manual and 2016 ITE Warehouse Study methodologies to both the originally approved development plan and new site plan alternatives. These updated methodologies are more modern, based on an extra decade of study and improved assumptions, and generally accepted by professionals as more accurate. The trip generation rates used are set forth in Table 1 of the TIA, in Appendix 2.

Using the most current assumptions, the Original Project would have resulted in the following trip generation from the development of the Phase 3 Site:

Table 1: Project Trip Generation - Originally Approved Site Plan

South Perris Logistics Center Major Modification

Vehicle Type	PCE Factor[1]	Units[2]	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Proposed Project Trip Generation (classification, non-PCE) [3]									
Passenger Cars	-	3,166 KSF	3,008	136	41	**177**	63	184	**247**
2-Axle Trucks	-		253	9	3	**12**	3	9	**12**
3-Axle Trucks	-		285	13	3	**16**	3	9	**12**
4-Axle Trucks	-		887	38	13	**51**	13	32	**45**
Total			**4,433**	**196**	**60**	**256**	**82**	**234**	**316**
Passenger Car Equivalent (PCE) Project Trip Generation									
Passenger Cars	1	3,166 KSF	3,008	136	41	**177**	63	184	**247**
2-Axle Trucks	1.5		380	14	5	**19**	5	14	**19**
3-Axle Trucks	2		570	26	6	**32**	6	18	**24**
4-Axle Trucks	3		2,661	114	39	**153**	39	96	**135**
Total			**6,619**	**290**	**91**	**381**	**113**	**312**	**425**

[1] PCE factors per San Bernardino County Transportation Authority

[2] KSF = 1,000 square feet gross floor area; total site plan floor area per site plan approved July 2010

[3] ITE Trip Generation Manual 10th Ed (2017) - Land Use 154; ITE/SCAQMD High-Cube Warehouse Vehicle Trip Generation Analysis (2016)

The proposed Project would result in the following trip generation, *without* assuming any offset as a result of the proposed rail operations:

Table 3: Trip Generation - New Proposed Site Plan

South Perris Logistics Center Major Modification

Vehicle Type	PCE Factor[1]	Units[2]	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Proposed Project Trip Generation (classification, non-PCE) [3]									
Passenger Cars	-	2,841 KSF	2,699	122	37	**159**	57	165	**222**
2-Axle Trucks	-		227	9	3	**12**	3	9	**12**
3-Axle Trucks	-		256	11	3	**14**	3	9	**12**
4-Axle Trucks[4]	-		795	34	11	**45**	11	28	**39**
Total			**3,977**	**176**	**54**	**230**	**74**	**211**	**285**
Passenger Car Equivalent (PCE) Project Trip Generation									
Passenger Cars	1	2,841 KSF	2,699	122	37	**159**	57	165	**222**
2-Axle Trucks	1.5		341	14	5	**19**	5	14	**19**
3-Axle Trucks	2		512	22	6	**28**	6	18	**24**
4-Axle Trucks	3		2,385	102	33	**135**	33	84	**117**
Total			**5,937**	**260**	**81**	**341**	**101**	**281**	**382**

[1] PCE factors per San Bernardino County Transportation Authority

[2] KSF = 1,000 square feet gross floor area; total site plan floor area per site plan dated March 2021

[3] ITE Trip Generation Manual 10th Ed (2017) - Land Use 154; ITE/SCAQMD High-Cube Warehouse Vehicle Trip Generation Analysis (2016)

The following tables provide a comparison of the total peak-hour and daily trip generation for the previously approved Original Project (Phase 3 Site only) and the proposed Project, both PCE trips and raw trips generated:

Table 4: Project Trip Generation Comparison (PCE)

South Perris Logistics Center Major Modification

Scenario	Units[1]		Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Approved Development [2]	3,166	KSF	6,619	290	91	**381**	113	312	**425**
New Proposed Site Plan [2]	2,841	KSF	5,937	260	81	**341**	101	281	**382**
Net Change	-326	KSF	-682	-30	-10	**-40**	-12	-31	**-43**

[1] KSF = 1,000 square feet gross floor area

[2] ITE Trip Generation Manual 10th Ed (2017) - Land Use 154; ITE/SCAQMD High-Cube Warehouse Vehicle Trip Generation Analysis (2016)

Table 5: Project Trip Generation Comparison (non-PCE)

South Perris Logistics Center Major Modification

Scenario	Units[1]		Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Approved Development [2]	3,166	KSF	4,433	196	60	**256**	82	234	**316**
New Proposed Site Plan [2]	2,841	KSF	3,977	176	54	**230**	74	211	**285**
Net Change	-326	KSF	-456	-20	-6	**-26**	-8	-23	**-31**

[1] KSF = 1,000 square feet gross floor area

[2] ITE Trip Generation Manual 10th Ed (2017) - Land Use 154; ITE/SCAQMD High-Cube Warehouse Vehicle Trip Generation Analysis (2016)

As set forth in Tables 4 and 5 above, even without considering any reduction in traffic that would occur from the proposed Project's rail spur, the Project would reduce the traffic generated by the development of the Site when compared to the traffic that would be generated by the Original Project analyzed in the EIR. This is true whether or not a passenger car equivalent (PCE) analysis is used. Accordingly, the impacts of the Project relating to traffic and transportation are fully covered by the previously certified EIR, because the Project would not result in any new or increased significant impacts.

In addition to the Project reducing the traffic generated by development of the Site when compared to the traffic that would have been generated by the Original Project, the Project would not increase the number of residents, or result in any other factors that would increase impacts on traffic and circulation that were not previously analyzed by the EIR. Additionally, the Project will be required to implement any applicable mitigation measures implemented by the EIR.

Accordingly, the Project would not result in any new or increased significant impacts on transportation that was not already analyzed in, and fully covered by, the previously certified

EIR. Instead, because the Project result in less square footage being developed on the Site than assumed in the EIR, the Project would result in less traffic generated than the Original Project, as demonstrated by the results of the TIA detailed above. (*See,* Appendix 2.) Traffic would be reduced even further as a result of the proposed rail spur, but that has not been relied on to reach this conclusion. As a result, the Project's impacts on transportation would generally be reduced when compared to the impacts of the development of the Site permitted by Original Project, as disclosed and analyzed in the EIR.

Vehicle Miles Traveled (VMT) Analysis

The Original Project EIR did not specifically analyze vehicle miles traveled (VMT) for traffic analysis purposes, as VMT was not a CEQA requirement at the time of its preparation, but it is nonetheless not new information of significant importance because all the information required to determine VMT generated by the Original Project is contained in the previously certified EIR, as explained herein. Further, because the EIR was certified prior to the recently enacted VMT regulaitons, a VMT analysis is not legally required in this Addendum thereto.

In December 2018, the California Natural Resources Agency finalized updates to the State CEQA Guidelines, which included Senate Bill 743 (SB 743). SB 743 was signed into law by the Governor in 2013. SB 743 required the Office of Planning and Research and the California Natural Resources Agency to develop alternative methods of measuring transportation impacts under CEQA. Regulatory changes to the State CEQA Guidelines that implement SB 743 were approved on December 28, 2018. Under those new regulatory changes, new State CEQA Guidelines section 15064.3 provides that transportation impacts of projects are, in general, best measured by evaluating the project's VMT. Automobile delay (often called Level of Service) will no longer be considered an environmental impact under CEQA. Automobile delay can, however, still be used by agencies to determine local operational impacts. Because this Addendum is to an EIR certified well before the adoption of SB 742 and Guidelines section 15064.3, VMT analysis is not required as part of this Addendum. However, a VMT analysis has nonetheless been prepared for both the Original Project and the proposed Project for informational purposes, and to ensure compliance with SB 743. (*See,* Appendix 3.) As demonstrated herein, the Project's VMTs would be reduced compared to the Original Project, and therefore no new or increased significant impacts not already analyzed in the EIR would result.

The Original Project would have resulted in the development of 3,167,000 square feet of industrial warehouse uses. The proposed Project would only result in the development of 2,840,838 square feet of these same uses (rounded up to 2,841,000 for the purposes of the VMT analysis). The estimated daily and peak hour trip generation for the Original Project and the Modified Projects were determined using the ITE Trip Generation Manual, 10th Edition. Trip generation for the approved Project and Modified Projects are shown in the tables below. As set forth in Tables 2 through 5 above and set forth in more detail in both Appendices 2 and 3, the project would result in less PCE daily and peak hour trips, across all categories, as set forth below:

Scenario	Units[1]		Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Approved Development [2]	3,166	KSF	4,433	196	60	**256**	82	234	**316**
New Proposed Site Plan [2]	2,841	KSF	3,977	176	54	**230**	74	211	**285**
Net Change	-326	KSF	-456	-20	-6	**-26**	-8	-23	**-31**

[1] KSF = 1,000 square feet gross floor area

[2] ITE Trip Generation Manual 10th Ed (2017) - Land Use 154; ITE/SCAQMD High-Cube Warehouse Vehicle Trip Generation Analysis (2016)

VMT is based on the number of trips and the distance those trips travel to and from the project. A multiplication of the number of trips and the average distance of trips results in a total VMT for the project. Therefore, a reduction in trips will result in a reduction in total project VMT when compared between similar land uses. Per the TIA (Appendix 2) and the Project's Air Quality Analysis (Appendix 1), it is assumed that each truck trip is 42 miles long. Daily home-based work VMT per worker was assumed to be 11.29 miles (5.65 miles each trip) per the Western Riverside Council of Governments (WRCOG) VMT Screening Tool for the Project's parcels. As set forth the VMT Analysis prepared by Albert A. Webb Associates (March 2021), attached hereto as Appendix 3, the tables below were prepared using these mileage assumptions and shows significant decreases in daily VMT for the Project, when compared to the Original Project. Specifically, the proposed Project would reduce Daily VMT by 10.3%, from 76,845 daily VMT to 68,925 daily VMT:

Table 12: Originally Approved Project Daily VMT

Vehicle Type	Avg Dist (mi)	Daily Trips[1]	Daily VMT[2]
Original Project (3,102,000 sf)			
Passenger Cars	5.65	3,008	16,995
2-Axle Trucks	42	253	10,626
3-Axle Trucks		285	11,970
4-Axle Trucks		887	37,254
Total		**4,433**	**76,845**

[1] Vehicle trip generation calculated per ITE Trip Generation Manual (10e, 2017).

[2] VMT = Vehicle-Miles Traveled

Table 13: Proposed Project Plan Daily VMT

Vehicle Type	Avg Dist (mi)	Daily Trips[1]	Daily VMT[2]
Modified Project (2,841,000 sf)			
Passenger Cars	5.65	2,699	15,249
2-Axle Trucks	42	227	9,534
3-Axle Trucks		256	10,752
4-Axle Trucks		795	33,390
Total		**3,977**	**68,925**

[1] Vehicle trip generation calculated per ITE Trip Generation Manual (10e, 2017).

[2] VMT = Vehicle-Miles Traveled

The presence of a freight rail transportation element for the Project would even further lower VMT as it would replace truck trips that generally come from distant locations such as the Port of Los Angeles, but this has not been relied on in the foregoing analysis, in the interest of being as conservative as possible, and assuming the maximum possible impacts of the proposed Project. Accordingly, the total project VMT impacts resulting from the Project would be lower than the Original Project because of the reduction in building size, reduction in vehicle trips, and the possibility for the inclusion of freight rail transportation. Thus, the VMT impacts of the Project are less than the Original Project evaluated in the EIR, and as a result, the Project would not result in any new or increased significant impacts on transportation that were not already analyzed in, and fully covered by, the previously certified EIR. (*See*, Appendix 3.)

Traffic Hazards Analysis

The Original Project EIR identified potential impacts on traffic hazards resulting from development of the Original Project. The EIR concluded all of these impacts resulting from the Original Project were less than significant, and no mitigation measures were required.

The Project will result in less overall square footage (by 325,618 square feet) and lowered VMT, reducing the already less than significant impacts related to traffic hazards disclosed and analyzed in the EIR, which assumed more square footage and a larger building footprint. The Project also includes the addition of a rail access spur, which would further reduce traffic affecting the Project site. Accordingly, the Project would reduce the already less than significant transportation impacts disclosed and analyzed in the EIR, including traffic hazards.

Finally, as was the case in the approved 2020 Addendum, the proposed rail spur would extend over property located between Ellis Avenue and Case Road outside of the Original Project site. The CPUC is the state agency with exclusive jurisdiction over rail crossings in California, including detailed analysis of the safety thereof. CPUC engineers evaluate the safety of rail

crossings and review proposed construction where roadways or pathways cross railroad or rail transit tracks. The Project will require a permit from CPUC, and compliance with the conditions of approval imposed by the CPUC, including those related to rail safety requirements and traffic hazards, including measures such as signage, gates, horns, and the like. The CPUC approval process will ensure that the rail spur will not result in any significant impacts relating to hazards.

Additionally, the improvements to the Ellis Avenue Railroad Crossing will require the complete closure to the Ellis Avenue railroad crossing. As set forth in more detail in Appendix 4, this may result in a railroad crossing road closure on Ellis Avenue for approximately four months during construction of the Project and offsite improvements (Ellis Avenue and Redlands Avenue construction). As a result, Albert A. Webb & Associates conducted a detour analysis for both passenger cars and large trucks, and no significant impacts would occur to the operation of existing circulation, or in any other respect. (Appendix 4, pp. 2-4.) This confirms that the Project would not result in any new or increased significant impacts not already analyzed in the Original Project EIR, even when considering construction period impacts relating to offsite improvements.

Accordingly, the Project would not result in any new or increased significant impacts on traffic hazards, or any other aspect of traffic and/or transportation, that were not already analyzed in, and fully covered by, the previously certified EIR.

6.R Tribal Cultural Resources

	New Significant Impact	***More Severe Impacts***	***New Ability to Substantially Reduce Significant Impact***	***No Substantial Change from Previous Analysis***
Would the project:				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	☐	☐	☐	☒
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe	☐	☐	☐	☒

As part of the processing of the approval of the Original Project and as described in the EIR, the City engaged in the required Native American Consultation with respect to the Site. Tribal representatives only required review of cultural resource assessments for the Phase 2 site.

The Project would not impact the Phase 2 site, nor would the buildings proposed by either affect any property outside of the same Site previously analyzed by the EIR. In other words, the Project would result in the development of the same land previously analyzed by the EIR, and therefore the Project not affect any tribal cultural resources outside of the Original Project's development envelope, as analyzed in the EIR. While the proposed rail spur and other offsite improvements would extend over property located between Ellis Avenue and Case Road outside of the Original Project site, as was concluded in the approved 2020 Addendum, no additional impacts would result because (1) there is no evidence or other reason to believe tribal cultural resources exist in the area outside of the Original Project site impacted by the rail spur (which, just like the Original Project site, was historically used for agricultural uses and no known tribal cultural resources exist), and (2) all the same mitigation measures set forth above will be implemented by the Project for all areas disturbed by its development, regardless of location, specifically includes all of mitigation measures set forth in the Cultural Resources section of the EIR and in Section 6.E above.

Accordingly, the Project would not result in any new or increased significant impacts on tribal resources that were not already analyzed in, and fully covered by, the previously certified EIR. Instead, impacts would generally be less than the Original Project because the Project would not result in any development or impacts to the Phase 2 site, which is the most sensitive with respect to tribal resources.

6.S Utilities and Service Systems

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

The EIR ultimately concluded that the Original Project would have no significant impacts on utilities and service systems. However, the EIR identified potentially significant impacts on stormwater and drainage facilities, as the Original Project proposed to route stormwater flows from the three Original Project sites to various stormwater drainage facilities into the Perris Valley Storm Channel. As a result, the EIR proposed the following mitigation measure:

> 4.12.6.1A Prior to the issuance of a grading permit, the project proponent shall submit a detailed grading and drainage plan, with supporting engineering calculations, to the City Engineer for review and approval. The plans shall incorporate relevant requirements identified by the City, and/or identified in the Uniform Building Code, and/or site-specific geotechnical investigations. The plans shall provide evidence that the storm drainage system would be adequate to convey water for the design storm event (as specified by the City) from the project site.

The EIR concluded after the implementation of this mitigation measure, the Original Project will have a less than significant impact on stormwater drainage capacity.

The Project does not change this analysis because its development would not increase the volume of stormwater runoff by significantly altering the development and uses analyzed under the original EIR. The Project would develop the same Site as analyzed in the EIR, and may even reduce impervious surfaces when compared to the Original Project, given the less intense development of the Site, which would result in the development of 325,618 less square feet of building area, and one less building. Further, the Project will implement the foregoing mitigation measures, and any other conditions of approval imposed by the City relating to the offsite storm water improvements that it will require (*see*, Figure 2). All impacts relating to utilities and service systems will also be less than significant.

Accordingly, the Project would not result in any new or increased significant impacts on utilities and service systems that were not already analyzed in, and fully covered by, the previously certified EIR.

6.T Wildfire

	New Significant Impact	***More Severe Impacts***	***New Ability to Substantially Reduce Significant Impact***	***No Substantial Change from Previous Analysis***
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

As set forth in Section 4.6 of the EIR (Hazards and Hazardous Materials), the EIR concluded that, based on the Initial Study prepared by the City and attached to the EIR as Appendix A, all of the

Original Project's impacts related to wildland fires were less than significant and did not warrant detailed discussion in the EIR.

The Project would not result in the development outside the area previously analyzed by the Initial Study and EIR (one of the three project sites analyzed therein), as a result, there would be no new, different or increased impacts related to wildfires. Further, redeveloping a vacant Site that may contain fuel for wildfires with an industrial use would actually reduce fire risk. The Project would also comply with all applicable regulations, including the California Fire Code and emergency response plan, and since the time the Original Project was approved and the EIR certified, the California Fire Code has been updated to be more protective against wildfires. Accordingly, the Project's compliance with the current Fire Code and other applicable regulations would further reduce impacts related to wildfires when compared to impacts the EIR assumed would occur from the Original Project

Accordingly, the Project would not result in any new or increased significant impacts on geology and soils that were not already analyzed in, and fully covered by, the previously certified EIR.

6.U Mandatory Findings of Significance

	New Significant Impact	*More Severe Impacts*	*New Ability to Substantially Reduce Significant Impact*	*No Substantial Change from Previous Analysis*
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)?	☐	☐	☐	☒
c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

The EIR found the following impacts of the Original project to be significant and unavoidable:

> **Traffic (Local Conditions)** – Cumulative freeway mainline traffic impacts to several segments of the I-215 were found to be significant and unavoidable.
> **Air Quality** – The project will introduce significant construction emissions, fugitive dust emissions, localized operational emissions, and cumulative potentially significant impacts on global climate change.

The Project would not result in the need to make any new or different mandatory findings of significance. The significance conclusions under the Project are the same as the EIR's conclusion because the Project would not cause any new or increased significant impacts under any impact category. Not only would no new or increased significant impacts result from the Project when compared to the Original Project, the Project would actually result in decreased impacts in many categories as a result of the fact that the Project allows significantly less square footage to be developed on the Site than assumed and analyzed in the EIR as part of its analysis of the impacts of the Original Project. As such, the Project would reduce the severity of the significant and unavoidable traffic and air quality impacts disclosed in the EIR, but it would not reduce these impacts to a less than significant level.

Based on the findings and information contained in the previous EIR, the analysis above, and the CEQA statute and State CEQA Guidelines, including sections 15162 through 15164, the proposed Project will not result in any additional effects on any environmental resources located on or near the Site and the potential environmental effects of the proposed relocation have been adequately addressed in the previously certified EIR for the South Perris Industrial Project. No new or increased impacts not already analyzed in the EIR would result from the Project, and there is no new information of substantial importance that was not available at the time the EIR was certified. Therefore, the approval of this Addendum to the EIR is appropriate under State CEQA Guidelines section 15164 and the Public Resources Code.