INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION No. 2366

FOR THE

Harley Knox Commerce Center Project (DPR 21-00006)

City of Perris
Planning Division
135 North “D” Street
Perris, CA 92570

April 2022

Initial Study/
Mitigated Negative Declaration 2366

Harley Knox Commerce Center (DPR21-00006)

Lead Agency:

City of Perris
Planning Division
135 North "D" Street
Perris, California 92570

Contact: Mathew Evans
(951) 943-5003 x115

April 2022

TABLE OF CONTENTS

Section **Page**

TABLES

EXHIBITS

APPENDICES

Appendix

A Air Quality Impact Analysis
B Mobile Source Health Risk Assessment
C1 MSHCP Consistency Analysis
C2 Sensitive Plant Surveys
C3 Arborist Evaluation
D Cultural Resources S
E Energy Analysis
F Geotechnical Investigation
G Paleontological Assessment
H Greenhouse Gas Analysis
I1 Phase I Environmental Site Assessment
I2 Soil Investigation
J Preliminary Water Quality Management Plan
K Preliminary Hydrology Calculations
L Noise Impact Analysis
M VMT Scoping Form and Trip Generation

SECTION 1.0 INTRODUCTION

1.1 PURPOSE AND SCOPE

Pursuant to the California Environmental Quality Act (CEQA, California Public Resources Code, Sections 21000, et seq.) and the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines, California Code of Regulations, Title 14, Sections 15000 *et seq.*), this Initial Study has been prepared in order to determine whether implementation of the proposed Harley Knox Commerce Center Project – DPR21-00006 (Project) could result in potentially significant environmental impacts that would require the preparation of an Environmental Impact Report (EIR). This Initial Study has evaluated each of the issue areas contained in the checklist provided in Section 3.0 of this document. The objective of this environmental document is to inform City of Perris decision makers, representatives of other affected/responsible agencies, and other interested parties of the potential environmental effects that may be associated with the Project.

If an Initial Study prepared for a project determines that no or less than significant effects on the environment would occur or that potentially significant impacts can be reduced to less than significant levels with implementation of specified mitigation measures, the Lead Agency can prepare a Negative Declaration (ND) or a Mitigated Negative Declaration (MND) pursuant to the State CEQA Guidelines (14 California Code of Regulations, Sections 15070–15075). An ND or MND is a statement by the Lead Agency attesting that a project would produce less than significant impacts, or that potentially significant impacts can be reduced to less than significant levels with mitigation. If an Initial Study prepared for a project determines it may produce significant effects on the environment, an Environmental Impact Report (EIR) shall be prepared. This further environmental review is required to address the potentially significant environmental effects of the project and to provide mitigation where necessary and feasible.

The Project site is within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area and is designated Light Industrial in the PVCCSP. The PVCCSP was adopted by the City of Perris City Council on January 12, 2012 (Ordinance No. 1284) and, as of the date that this Initial Study was prepared, has been subsequently amended through September 2021. The environmental impacts resulting from implementation of allowed development under the PVCCSP have been evaluated in the Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (PVCCSP EIR) (State Clearinghouse No. 2009081086), which was certified by the City of Perris City Council in January 2012. The PVCCSP EIR is a program EIR, and project-specific evaluations in later-tier environmental documents for individual development projects within the PVCCSP planning area was anticipated. As stated in Section 15168(d)(3) of the State CEQA Guidelines, the program EIR can "[f]ocus an EIR on a later activity to permit discussion solely of new effects which had not been considered before." Further, as stated in Section 15168(d)(1) of the State CEQA Guidelines, a program EIR can "[p]rovide the basis in an Initial Study for determining whether the later activity may have any significant effects." As such, the environmental analysis for the Project presented in this Initial Study is based on, or "tiered" from, the analysis presented in the PVCCSP EIR, when applicable, and the PVCCSP EIR is incorporated by reference (refer to Section 2.4 of this Initial Study).

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

Plan area comply with the required PVCCSP Standards and Guidelines and applicable PVCCSP EIR mitigation measures as outlined in the MMRP, and that these requirements are to be implemented in a timely manner. Relevant Standards and Guidelines from the PVCCSP and PVCCSP EIR mitigation measures that are applicable to the Project are listed in the introduction to the analysis for each topical issue in Section 3.0 and are assumed in the analysis presented.

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

1.2 FINDINGS OF THIS INITIAL STUDY

This Initial Study is based on an Environmental Checklist Form (Form), as suggested in Section 15063(d)(3) of the State CEQA Guidelines. The Form is found in Section 3.1 of this Initial Study. It contains a series of questions about the Project for each of the listed environmental topics presented in Appendix G to the State CEQA Guidelines and used by the City of Perris for CEQA purposes. The Form is used to evaluate whether or not any significant environmental effects are associated with implementation of the Project, even with implementation of required PVCCSP Standards and Guidelines and applicable PVCCSP EIR mitigation measures. The explanation for each answer is included in Section 3.1.

The Form is used to review the potential environmental effects of the Project for each of the following areas:

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

As identified through the analysis presented in this Initial Study, with incorporation of applicable mitigation measures from the PVCCSP EIR and PVCCSP Standards and Guidelines, and compliance with regulatory requirements, the Project would have no impacts or less than significant impacts related to Agriculture and Forestry Resources, Air Quality, Biological Resources, Energy, Geology and Soils (not including Paleontological Resources), Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, and Wildfire.

The analysis for the following environmental topics indicates the potential for significant impacts and the need for Project-specific mitigation: Aesthetics, Cultural Resources, Geology and Soils (Paleontological Resources), and Tribal Cultural Resources. With the implementation of Project-

specific mitigation measures, these impacts would be less than significant. No potentially significant impacts requiring the preparation of an EIR would result from the Project.

1.3 CONTACT PERSON

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

Mathew Evans, Project Planner
City of Perris Planning Division
135 North “D” Street
Perris, California 92570
(951) 943-5003 x115
mevans@cityofperris.org

SECTION 2.0 PROJECT DESCRIPTION

2.1 PROJECT SITE LOCATION AND SETTING

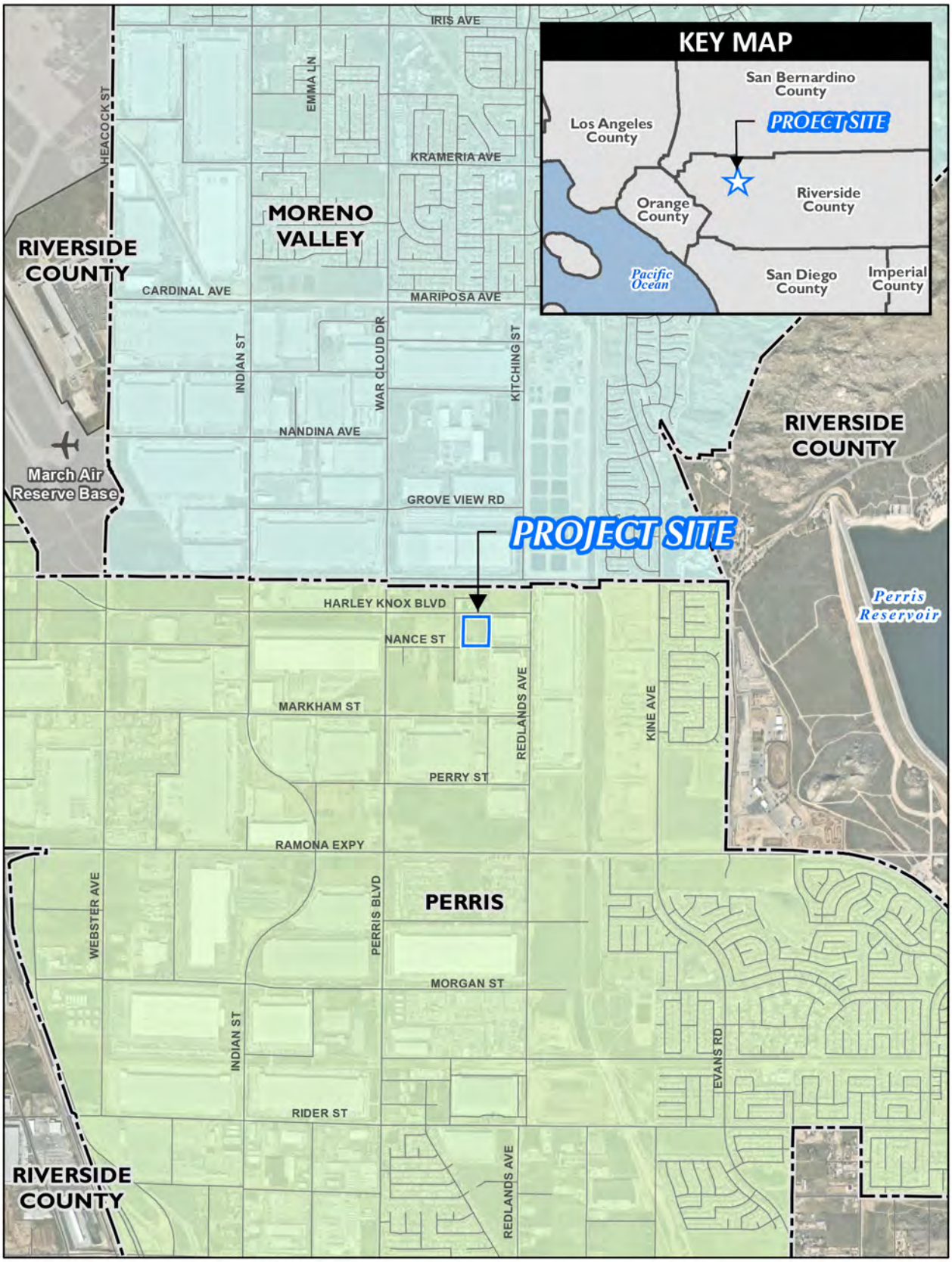
The Project site encompasses approximately 6.4 acres, and is located at 25264 E Nance Street, south of Harley Knox Boulevard and north of Nance Street, generally between Las Palmas and Redlands Avenue. The site is located in the northeastern portion of the PVCCSP planning area, in the City of Perris (City), in Riverside County. Local access would be provided to the Project from Harley Knox Boulevard and Nance Street, adjacent to the Project site. Interstate (I)-215 is approximately 2.0 miles west of the Project site. Exhibit 1 depicts the regional location and local vicinity of the Project site.

As shown on the aerial photograph provided on Exhibit 2, the Project site is currently unoccupied and undeveloped, with no observed or reported onsite operations. Foundations from previous uses onsite remain. Land uses adjacent to the Project site include an unoccupied non-conforming[1] single-family home and vacant land to the west; Nance Street, and a non-conforming residential structure and semi-truck staging yard to the south; industrial/warehouse uses to the east and southeast; Harley Knox Boulevard, two non-conforming single-family homes and a semi-truck staging area to the north; and vacant land to the northeast and northwest. Nance Street is an unimproved roadway along the southern Project site boundary; this roadway is improved east of the Project site and terminates at Redlands Avenue. Harley Knox Boulevard is improved along the northern Project site boundary, with curb, gutter, and sidewalk improvements on the north and south side of the street; the eastern terminus of this roadway is also Redlands Avenue. An existing non-conforming residential property is located approximately 10 feet west of the Project site. This property is currently owned by an industrial development that intends to demolish the house for redevelopment of the property with a light industrial use, consistent with the PVCCSP land use designation.

The Project site is relatively flat, descending gradually from northwest to southeast; the elevations on site range from approximately 1,461 feet above mean sea level (amsl) in the southeast portion of the site and 1,457 feet amsl in the northwest portion of the site. The Project site is underlain by artificial fill and disturbed top soils to depths of approximately 1.0 to 1.5 feet and native soil that extends to at least the maximum depth explored (51.5-feet below the ground surface [bgs]) (NorCal Engineering, 2021). The Project site is located on land designated by the California Department of Conservation in its Farmland Mapping and Monitoring Program as “Other Land” (DOC, 2018).

As further discussed in the Biological Resources section of this Initial Study, the Project site is within the Mead Valley Area Plan of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). Vegetation on the Project site is dominated by ruderal (weedy) plant species. Common bird and mammal species were observed on the Project site. The entire Project site occurs within a designated survey area for four narrow endemic sensitive species and nine criteria area sensitive plant species. Suitable habitat for the smooth tarplant (Centromadia pungens ssp. Laevis), an MSHCP Criteria Area species was documented onsite within the disturbed regions of the Project Site. However, none of the narrow endemic or criteria area sensitive plant species, including the smooth tarplant species, were found on the site during focused surveys in May and June 2021. The Project site is also within the designated survey area for the burrowing owl (*Athene cunicularia*). Based on the results of field survey, no burrowing owls

[1] A non-conforming use is generally defined as a land use or structure that was legal when established but does not conform to the standards of the current zoning ordinance for the property; in this case the PVCCSP.



Source(s): Esri, Nearmap Imagery (2021), RCTLMA (2021)

Exhibit 1

0 700 1,400 2,800 Feet

Project Location

Source(s): Esri, Nearmap Imagery (2021), RCTLMA (2021)

Exhibit 2

0 87.5 175 350
Feet

Aerial Photograph

or evidence of recent or historic use by burrowing owls was observed on the Project site (Cadre, 2021a).The Project site is not located within any designated MSHCP "Criteria Area" cells, and it is not within a "Core" or "Linkage" area. No Riparian/Riverine areas or vernal pools are located within or adjacent to the Project site or offsite impact areas.

The Project site and areas to the north, south, east, and west are designated Light Industrial in the PVCCSP and are subject to the Development Standards and Guidelines outlined in the PVCCSP. The Light Industrial designation provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials and retail related to manufacturing. The area southwest of the Project site, between Nance Street and Markham Street is designated for Business Professional Office uses.

The Project site is approximately 1.5 miles south east of the March Air Reserve Base/Inland Port Airport (MARB/IPA) and within the Airport Influence Area (AIA). Any development within this area is required to be compatible with applicable provisions of the City of Perris Airport Overlay Zone, the 2014 MARB/IPA Airport Land Use Compatibility Plan (2014 MARB/IPA ALUCP), and the 2018 MARB Air Installation Compatible Use Zone (2018 AICUZ) study. The Project site is within an area designated as Zone D (Flight Corridor Buffer) in the 2014 MARB/IPA ALUCP and is not within an Accident Potential Zone (APZ).

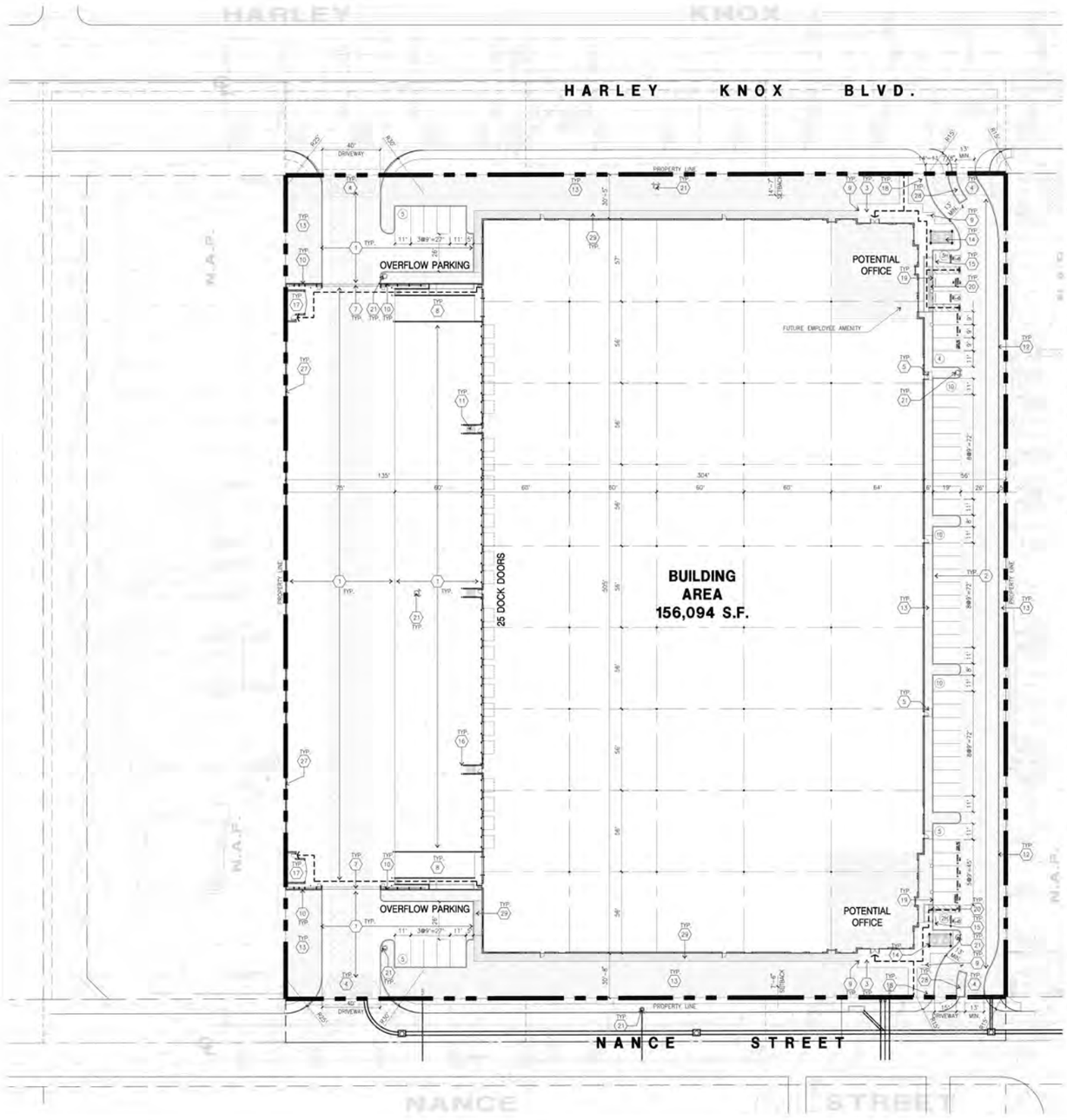
2.2 PROJECT DESCRIPTION

2.2.1 PROPOSED BUILDING

The Project would involve construction and operation of an approximately 156,094-square-foot (sf) industrial warehouse building and associated site improvements. The Conceptual Site Plan and Conceptual Floor Plan for the Project are presented on Exhibit 3 and Exhibit 4, respectively. The building would include approximately 7,000 sf of potential office space in the northeast and southeast corner of the building, with the remaining 149,094 sf of building space for warehousing. Twenty-five (25) loading docks would be provided along the west side of the building. The Project has been designed in compliance with the applicable Development Standards and Guidelines outlined in the PVCCSP, including but not limited to building setbacks, lot coverage, Floor Area Ratio (FAR), and architectural requirements.

Exhibit 5 and Exhibit 6 provide the building elevations for the proposed building. As shown, the building would be up to 43-feet 2-inches tall, although the roof height would vary based on the building's architectural features. The building would be constructed of painted concrete tilt-up panels and low-reflective materials, including low-reflective glass. The exterior color palette would be comprised of various shades of white and gray with accent colors. The office entries would feature stone tile. As shown by the building elevations, visual relief from building form would be achieved through fenestration, mullions, exterior canopies at the office entries, and through variations in height and rooflines, and the use of parapets. The various architectural elements would effectively avoid monotony and repetition in building elevations, and would minimize glare. It should also be noted that rooftop equipment would be screened behind the parapet and would not be visible from the street.

A key objective of the PVCCSP is to promote sustainable development and to encourage the use of "green" technologies. The Project would be constructed in compliance with California Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings and the Title 24 California Green Building Standards Code (CALGreen Code). Additionally, as presented in the Greenhouse Gas Emissions section of this Initial Study, the Project incorporates PVCCSP EIR mitigation measures that serve to reduce greenhouse gas (GHG) emissions.



PROJECT INFORMATION

Owner / Applicant
PROFICIENCY CAPITAL, LLC
11777 SAN VICENTE BOULEVARD
SUITE 780
LOS ANGELES, CA90049
TEL: (949) 842-3074
CONTACT: MATT ENGLHARD

Applicant Representative
HPA, INC.
18831 BARDEEN AVE. STE 100
IRVINE, CA 92612
PHONE: (310) 367-9009
CONTACT: JOSEPH KIM

Project Address
25264 EAST NANCE STREET
PERRIS, CA 92571

Code Analysis
2019 CALIFORNIA BUILDING CODE
2019 CALIFORNIA PLUMBING CODE
2019 CALIFORNIA MECHANICAL CODE
2019 CALIFORNIA ELECTRICAL CODE
2019 CALIFORNIA FIRE CODE
2019 CALIFORNIA ENERGY CODE
2019 CALIFORNIA GREEN BUILDING STANDARDS

Construction Type
CONCRETE TILT-UP BUILDING

BUILDING OCCUPANCY : S-1 / B
CONSTRUCTION TYPE : II-B

ESFR SYSTEM

Zoning
LIGHT INDUSTRIAL (LI)

APN
302-100-020 (TR 1)
302-100-030 (TR 2)
302-100-031 (TR 2)

VICINITY MAP

LEGAL DESCRIPTION

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

PARCEL NO. 2 OF PARCEL MAP NO. 18,223 IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AS PER PLAT RECORDED IN BOOK 104 OF PARCEL MAPS, PAGES 43 AND 44 IN THE OFFICE OF THE COUNTY OF RECORDER OF SAID COUNTY.

EXCEPTING THEREFROM THE MOBILE HOME LOCATION THEREON.

ALSO EXCEPTING THEREFROM THAT PORTION OF THE LAND DESCRIBED IN DOCUMENT RECORDED FEBRUARY 03, 2012 AS INSTRUMENT NO. 2012-0051980, OF OFFICIAL RECORDS.

FOR CONVEYANCING PURPOSES ONLY: APN 302-100-020

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

PARCELS 3 AND 4 OF PARCEL MAP NO. 18,223 OR FILE IN BOOK 104 PAGES 43 AND 44 OF PARCEL MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.

EXCEPTING THEREFROM THE PORTION OF THE LAND DESCRIBED IN DOCUMENT RECORDED NOVEMBER 14, 2011 AS INSTRUMENT NOS: 2011-0505929 AND 2011-0506188, BOTH OF OFFICIAL RECORDS.

FOR CONVEYANCING PURPOSES ONLY:
APN 302-100-030-3 (AFFECTS PARCEL 4) AND
302-100-031-4 (AFFECTS PARCEL 3)

APN:

302-100-020 (TR 1)
302-100-030 (TR 2)
302-100-031 (TR 2)

PROJECT DATA

SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONCRETE PAVEMENT.
2. ASPHALT CONCRETE (AC) PAVING.
3. CONCRETE WALKWAY, MEDIUM BROOM FINISH.
4. DRIVEWAY APRONS TO BE CONSTRUCTED.
5. PROVIDE DECORATIVE COLORED PAVEMENT.
6. 5'-0"X5'-0"X4" THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY AS REQ. BY CITY INSPECTOR.
7. APPROXIMATE LOCATION OF TRANSFORMER. CONTRACTOR TO VERIFY WITH S.C.E.
8. PROVIDE 8' HIGH METAL GATES W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
9. CONCRETE RAMP W/ 42" HIGH CONCRETE WALL.
10. EXTERIOR BIKE RACK TYPICAL.
11. 14' HIGH CONCRETE TILT-UP SCREEN WALL. DECORATIVE PILASTERS TO BE PLACED EVERY 100 FEET.
12. EXTERIOR CONCRETE STAIR.
13. CONCRETE CURB. SEE CIVIL DRAWINGS.
14. LANDSCAPE & HARDSCAPE. ALL LANDSCAPE & HARDSCAPE AREAS INDICATED BY SHADING.
15. PATIO AREA.
16. PRE-CAST CONCRETE WHEEL STOP.
17. CONCRETE FILLED GUARD POST "6 DIA. U.N.O. 42" H.
18. TRASH ENCLOSURE PER CITY STANDARD. SEE DAB-A4.1 FOR DETAILS.
19. ACCESSIBLE ENTRY SIGN.
20. ACCESSIBLE PARKING STALL SIGN.
21. TRUNCATED DOME.
22. APPROXIMATE LOCATION OF FIRE HYDRANT.
23. WALL MOUNTED LIGHTING FIXTURE.
24. SITE LIGHT POLE W/ CONCRETE BASE.
25. 8' HIGH METAL SWING GATE W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
26. 8' HIGH METAL FENCE. SEE DAB-A4.1 FOR DETAILS.
27. DESIGNATED SMOKING AREA.
28. NOT USED.
29. RAISED PLANTER.
30. WALKWAY WITH DG PAVING.

SITE PLAN GENERAL NOTES

1. THE SITE PLAN BASED ON THE SOILS REPORT PREPARED BY: TBD
2. IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM.
6. SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS.
8. CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS
9. SEE "C"DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". FINISH TO BE A MEDIUM BROOM FINISH U.N.O.
11. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
12. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
13. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
14. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
15. ALL VERTICAL MOUNTING POLES OF CHAIN LINK FENCING SHALL BE CAPPED.
16. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB.
17. ALL CONCRETE TILT-UP WALLS ARE REQUIRED TO PROVIDE ANTI-GRAFFITI COATING.

SITE LEGEND

- CONCRETE PAVING. SEE "C" DRWGS. FOR THICKNESS.
- STANDARD PARKING STALL. (9' X 19')
- LANDSCAPED AREA
- 26' WIDE FIRELANE
- DG PAVING
- ACCESSIBLE PARKING STALL (11' X 19') W/ 5' ACCESSIBLE AISLE
- ACCESSIBLE PARKING STALL (VAN) (12' X 19') W/ 5' ACCESSIBLE AISLE
- PATH OF TRAVEL

Source(s): HPA (01-18-2022)

Exhibit 3

Not to Scale

Conceptual Site Plan

FLOOR PLAN KEYNOTES

1. CONCRETE TILT-UP PANEL.
2. STRUCTURAL STEEL COLUMN.
3. TYPICAL STOREFRONT SYSTEM WITH GLAZING. SEE OFFICE ELEVATIONS FOR SIZE, COLOR AND LOCATIONS.
4. CONCRETE RAMP W/ 42"HIGH CONC. TILT-UP GUARD WALL OR BUILDING WALL ON BOTH SIDE OF RAMP.
5. 5'-0"X5'-0"X4" THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS NO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY AS REQ. BY CITY INSPECTOR.
6. EXTERIOR CONCRETE STAIR W/ 42"HIGH CONC. TILT-UP GUARD WALL OR BUILDING WALL.
7. 9' X 10' TRENCH DOOR, SECTIONAL O.H., STANDARD GRADE.
8. 4' X 8' LOUVERED OPENING FOR VENTILATION.
9. DOCK DOOR BUMPER TYPICAL.
10. 12' X 14' DRIVE THRU SECTIONAL O.H., STANDARD GRADE.
11. 3' X 7' HOLLOW METAL EXTERIOR MAN DOOR.
12. SOFFIT LINE ABOVE
13. CONC. FILLED GUARD POST 6" DIA. U.N.O. @ 8'-0" O.C.
14. 3' GUARD

FLOOR PLAN GENERAL NOTES

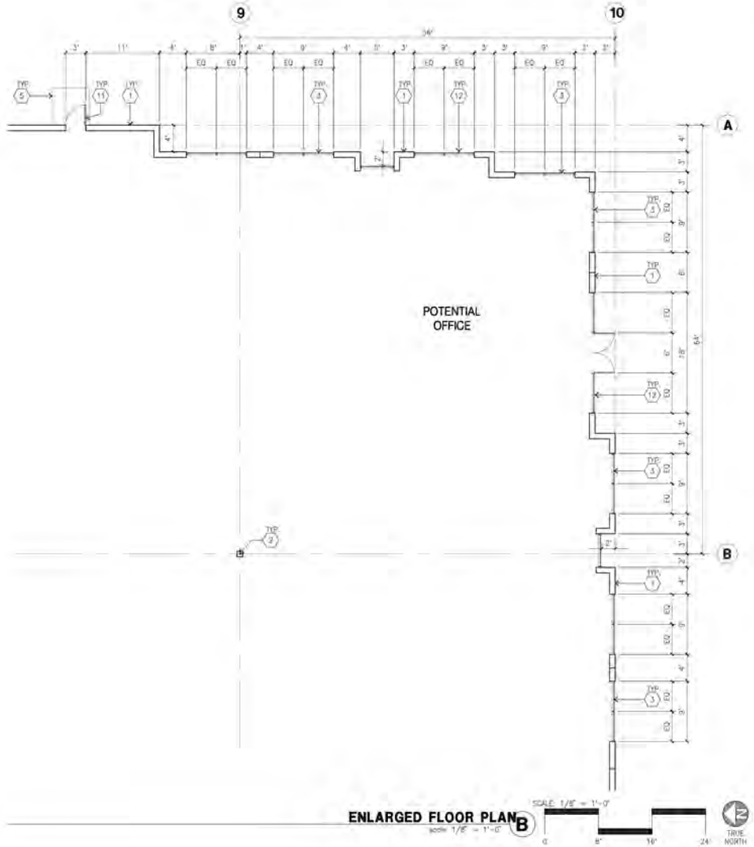
A. THIS BUILDING IS DESIGNED FOR HIGH PILE STORAGE WITH FIRE ACCESS MAN DOORS APPROX. 100' MAXIMUM. A SEPARATE PERMIT WILL BE REQUIRED FOR ANY RACKING/CONVEYER SYSTEMS.
B. FIRE HOSE LOCATIONS SHALL BE APPROVED PER FIRE DEPARTMENT.
C. THE BUILDING FLOOR SLAB IS FLOATED. SEE "C" DRAWINGS FOR FINISH SURFACE ELEVATIONS.
D. PROVIDE 8" DIA. CONCRETE BOLLARD AT ALL FIRE RISER AND UNPROTECTED INTERIOR ROOF DRAIN.
E. WAREHOUSE INTERIOR CONCRETE WALLS ARE PAINTED WHITE. COLUMNS ARE TO RECEIVE PRIMER ONLY. ALL CMP. BD. WALLS IN WAREHOUSE TO RECEIVE 1 COAT OF WHITE TO COVER.
F. SLOPE POUR STRIP 1/2" TO EXTERIOR AT ALL MANDOOR EXITS.
G. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE PANEL WALL, CMU/HSS, OR FACE OF STUD U.N.O.
H. SEE CIVIL DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR TO VERIFY ACTUAL UTILITY LOCATIONS. PLUMBING/ELECTRICAL COORDINATION.
I. FOR DOOR TYPES AND SIZES, SEE DETAIL SHEET A0.4. NOTE: ALL DOORS PER DOOR SCHEDULE ARE FINISH OPENINGS.
J. CONTRACTOR TO PROTECT AND KEEP THE FLOOR SLAB CLEAN. ALL EQUIPMENT TO BE DIAPERED INCLUDING CARS AND TRUCKS.
K. ALL EXIT MAN DOORS IN WAREHOUSE TO HAVE ILLUMINATED EXIT SIGN. HARDWARE.
L. HIGHLY FLAMMABLE AND COMBUSTIBLE MATERIAL SHALL NOT BE USED OR STORED IN THIS BUILDING.
M. EACH EXTERIOR EXIT DOOR SHALL BE IDENTIFIED BY A TACTILE EXIT SIGN WITH THE WORDS "EXIT". THE MOUNTING HEIGHT FOR SUCH SIGNAGE SHALL BE 60" FROM FINISH FLOOR LEVEL TO THE CENTER OF THE SIGN.
N. NON-ACCESSIBLE DOOR. PROVIDE WARNING SIGN LOCATED IN THE INTERIOR SIDE PER CBC 11336.1.1.3
O. ALL ROOF MOUNTED MATERIALS SHALL BE FULLY SCREENED FROM PUBLIC VIEW.

FLOOR SLAB & POUR STRIPS REQ.

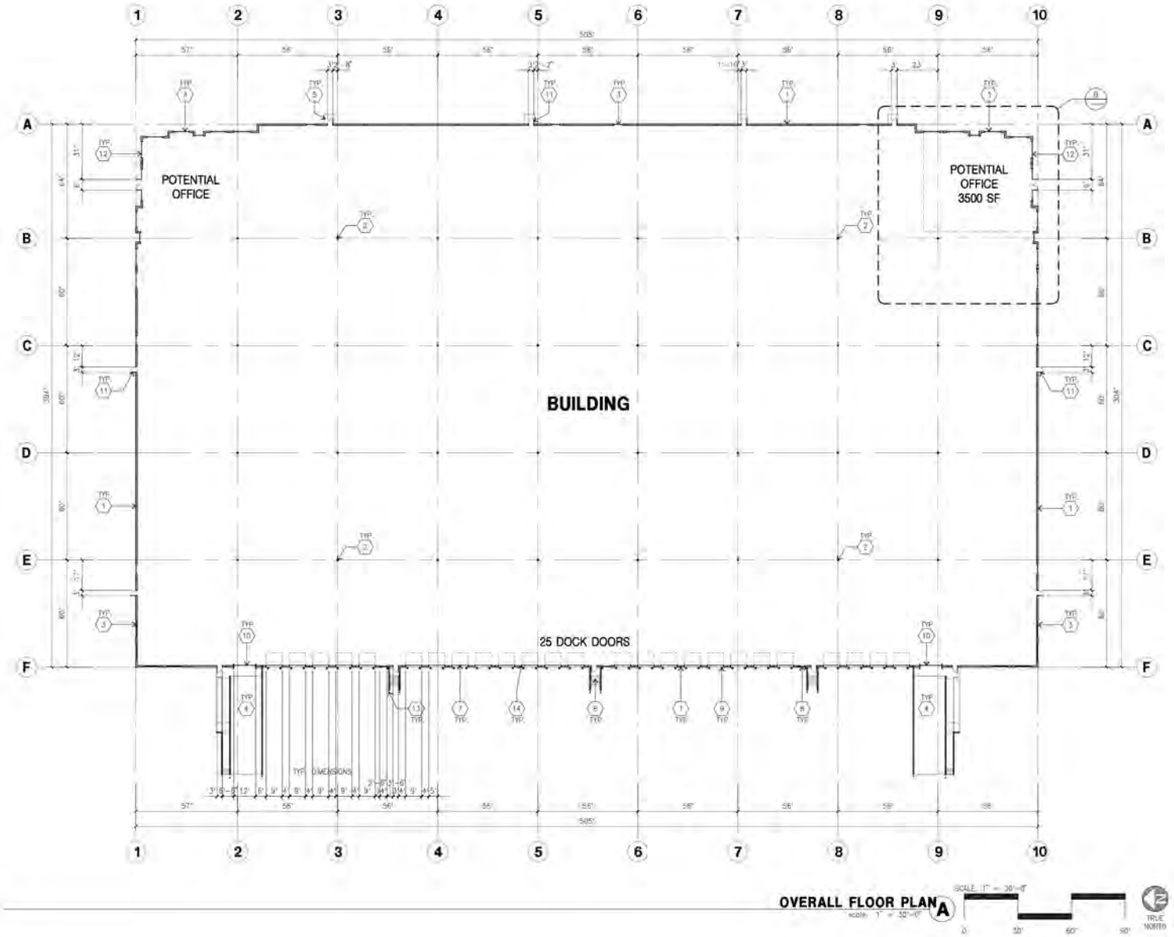
THESE NOTES ARE VERY MIN. REQUIREMENT. SEE "S" DWGS FOR ADDITIONAL REQUIREMENTS.

1. FLOOR COMPACTION = 95%
2. TRENCH COMPACTION = 90%
3. BUILDING FLOOR SLAB SEE STRUCTURAL DRAWINGS
4. CONTRACTOR TO BUILD FOR CLASS V FLOOR PER A.C.I. 302-R-96
5. CONCRETE SLAB TO HAVE STEEL FLOAT HARD TROWEL BURNISHED FINISH.
6. CONTRACTOR TO CURE SLAB TO BE WET CURING USING BURLENE FOR 7 DAYS MIN.
7. ALL EQUIPMENT & MOVING VEHICLES SHALL BE DIAPERED.
8. NO CRANES, CONCRETE TRUCKS, OR ANYTHING HEAVIER WILL BE PLACED ON THE SLAB.
9. SLAB TO BE FF50 FL35 MEASURED WITHIN 24 HOURS.
10. NO FLY ASH IN THE CONCRETE.
11. WHERE [ ] INDICATED, PROVIDE VAPOR BARRIER (15MIL STEGO OR EQUAL) UNDER THE CONCRETE SLAB. PROVIDE SAND PER SOILS ENGINEER OR MANUFACTURER'S RECOMMENDATION.

CONCRETE SLAB IN FUTURE OFFICE AREAS, WHERE SAND OVER VIQUEEN ARE REQUIRED, SHALL BE NATURALLY HYDRATED WITHOUT USE OF BURLENE, CURING COMPOUND, OR RELEASE AGENTS.
CONTROL/CONSTRUCTION JOINTS SHALL NOT BE FILLED WITH NM-180 JOINT FILLER IN FUTURE OFFICE AREAS.
12. SEAL CONCRETE SLAB W/ "LIPIDOLITH" SEALER



ENLARGED FLOOR PLAN B
scale: 1/8" = 1'-0"



OVERALL FLOOR PLAN A
scale: 1" = 30'-0"

Source(s): HPA (01-18-2022)

Exhibit 4

Not to Scale

Conceptual Floor Plan

ELEVATION KEYNOTES

1. CONCRETE TILT-UP PANEL.
2. PANEL JOINT.
3. PANEL REVEAL. ALL REVEALS TO HAVE A MAX. OF 3/8" CHAMFER. REVEAL COLOR TO MATCH ADJACENT BUILDING FIELD COLOR, U.N.O.
4. 12' X 14' OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND.
5. 9' X 10' OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND.
6. CONCRETE STAIR, LANDING AND GUARDRAIL W/ METAL PIPE HANDRAIL. PROVIDE NON SKID NOSING TO MEET ADA REQUIREMENTS. PROVIDE CONTRASTING COLORED 3" WIDE WARNING STRIPE INTEGRAL TO CONCRETE AT TOP LANDING AND BOTTOM TREAD PER ADA REQUIREMENTS.
7. 4' X 8' METAL LOUVER OPENING FOR VENTILATION. PAINT TO MATCH BUILDING COLOR.
8. HOLLOW METAL DOORS. PROVIDE COMPLETE WEATHER STRIPING ALL AROUND DOOR.
9. EXTERIOR DOWN SPOUTS W/ 2 OVERFLOW SCUPPERS.
10. DOCK DOOR BUMPER TYPICAL.
11. ALUMINUM STOREFRONT FRAMING WITH TEMPERED GLAZING AT ALL DOORS, SIDELITES ADJACENT TO DOORS AND GLAZING WITH BOTTOMS LESS THAN 18" ABOVE FINISH FLOOR ELEVATION.
12. CONC. FILLED GUARD POST, 6" DIA. 19 N.G., 42"H.
13. METAL CANOPY.

ELEVATION GENERAL NOTES

1. ALL PAINT COLOR CHANGES TO OCCUR AT INSIDE CORNERS UNLESS NOTED OTHERWISE.
2. ALL PAINT FINISHES ARE TO BE FLAT UNLESS NOTED OTHERWISE.
3. T.O.P. EL.= TOP OF PARAPET ELEVATION.
4. F.F. = FINISH FLOOR ELEVATION.
5. STOREFRONT CONSTRUCTION: GLASS, METAL ATTACHMENTS AND LINTELS SHALL BE DESIGNED TO RESIST +/- MPH, EXPOSURE "C" WHERE CONTRACTOR SHALL SUBMIT SHOP DRAWINGS PRIOR TO INSTALLATION.
6. CONTRACTOR SHALL FULLY PAINT ONE CONCRETE PANEL W/ SELECTED COLORS. ARCHITECT AND OWNER SHALL APPROVE PRIOR TO PAINTING REMAINDER OF BUILDING.
7. BACK SIDE OF PARAPETS TO HAVE SMOOTH FINISH AND BE PAINTED WITH ELASTOMERIC PAINT.
8. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH.
9. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
10. THE FIRST COAT OF PAINT TO BE ROLLED-ON AND THE SECOND COAT TO BE SPRAYED-ON.

ELEVATION COLOR LEGEND/SCHED.

1		PAINT, COLOR : SW 7004 SNOWBOUND
2		PAINT, COLOR : SW 7071 GRAY SCREEN
3		PAINT, COLOR : SW 6959 BLUE CHIP
4		PAINT, COLOR : SW 2013 NETWORK GRAY
5		PAINT, COLOR : SW 7074 SOFTWARE
6		PAINT, COLOR : SW 7075 WEB GRAY
7		MULLIONS COLOR : CLEAR ANODIZED
8		GLAZING COLOR : BLUE REFLECTIVE GLAZING
9		CANOPY: SHERWIN WILLIAMS ACRYLIC LATEX SYSTEMS HIGH GLOSS/ HIGH PERFORMANCE IN COLOR-DMSW55 BLUECHIP @ METAL CANOPY
10		BEDROCKSAND TILE STONE BARRIQUE PORCELAIN TILE GRID – 6"x40"
11		BEDROCKSAND TILE STONE BARRIQUE PORCELAIN TILE FONCE – 6"x40"
12		DARK GRAY METAL CAP

GLAZING LEGEND

NOTE: ALL EXTERIOR AND INTERIOR GLAZING SHALL BE TEMPERED.

IV — INSULATED VISION GLASS

SC — SPANDREL GLASS WITH CONCRETE BEHIND

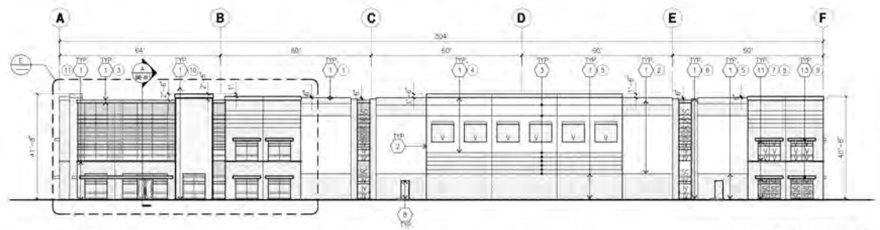
V — SINGLE LITE VISION GLASS

IV - INSULATED VISION GLASS
1/4" PPG SOLARCOOL GRAYLITE @ + 1/4" SOLARBAN 60 CLEAR
1" INSULATED GLASS UNIT WITH 5/8" AIRSPACE AND 1/4" LITES
U: 0.29 SHGC: 0.1, VLT: .10
MINIMUM VT TO BE 0.42 PER 2016 CEC TABLE 140.3-B

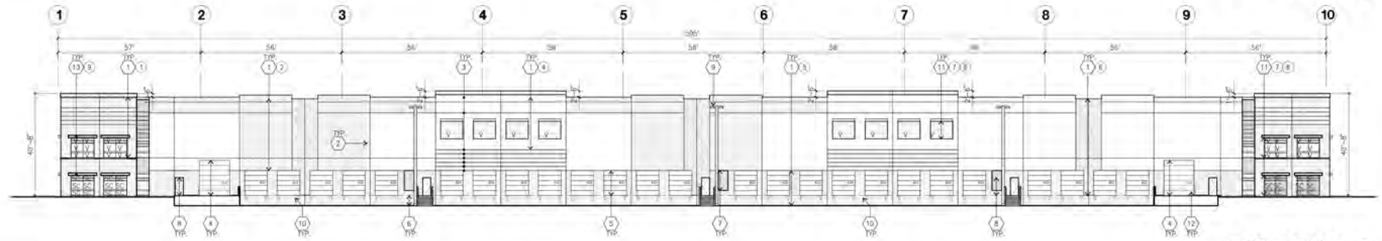
SC - SPANDREL WITH CONCRETE BEHIND
1/4" SOLARCOOL GRAYLITE WITH HARMONY GRAY SPANDRAL PAINTED ON REFLECTIVE METALLIZED SIN CONCRETE

V - VISION GLASS
1/4" PPG SOLARCOOL GRAYLITE @

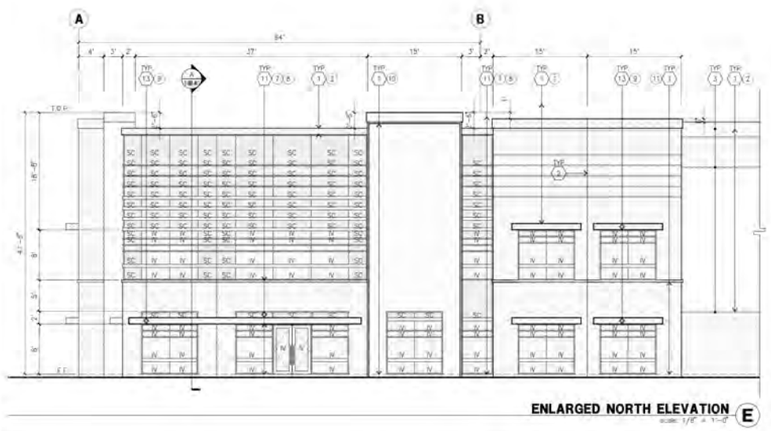
MULLIONS : ANODIZED CLEAR.



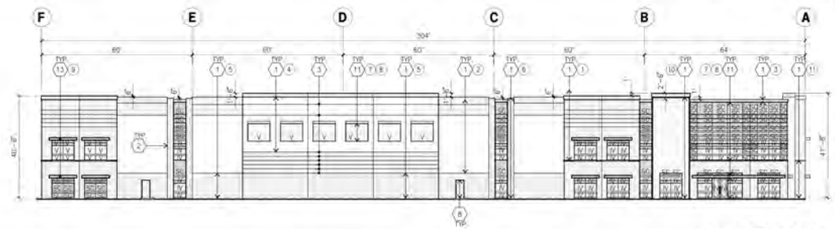
NORTH ELEVATION (A)
scale: 1" = 20'-0"



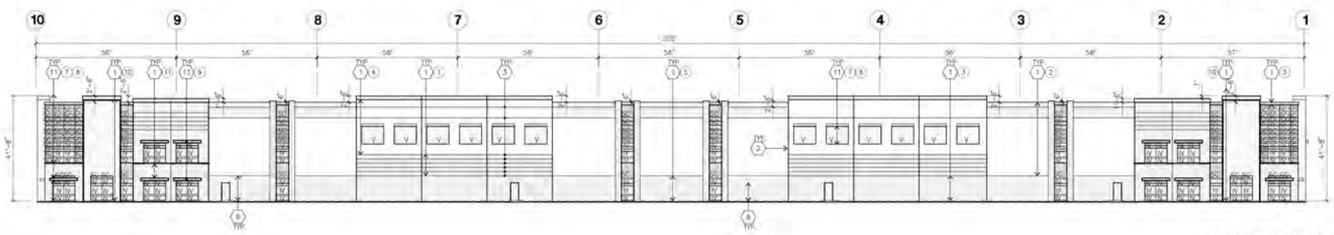
WEST ELEVATION (B)
scale: 1" = 20'-0"



ENLARGED NORTH ELEVATION (E)
scale: 1/8" = 1'-0"



SOUTH ELEVATION (C)
scale: 1" = 20'-0"



EAST ELEVATION (D)
scale: 1" = 20'-0"

Source(s): HPA (01-18-2022)

Exhibit 5

Not to Scale

Conceptual Building Elevations

Source(s): HPA (01-12-2022)

Exhibit 6

Not to Scale

Conceptual Colored Elevations

2.2.2 CIRCULATION AND PARKING

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

VEHICULAR CIRCULATION

Access to the Project site would be provided via two driveways along Harley Knox Boulevard, and two driveways along Nance Street. The driveways along Harley Knox Boulevard would be right-in and right-out only; the western driveway (40-feet) would be for trucks and automobiles and the eastern driveway (26-feet) would be for automobiles only. The driveways along Nance Street would be full access; the western driveway (40-feet) would be for trucks and automobiles and the eastern driveway (26-feet) would be for automobiles only.

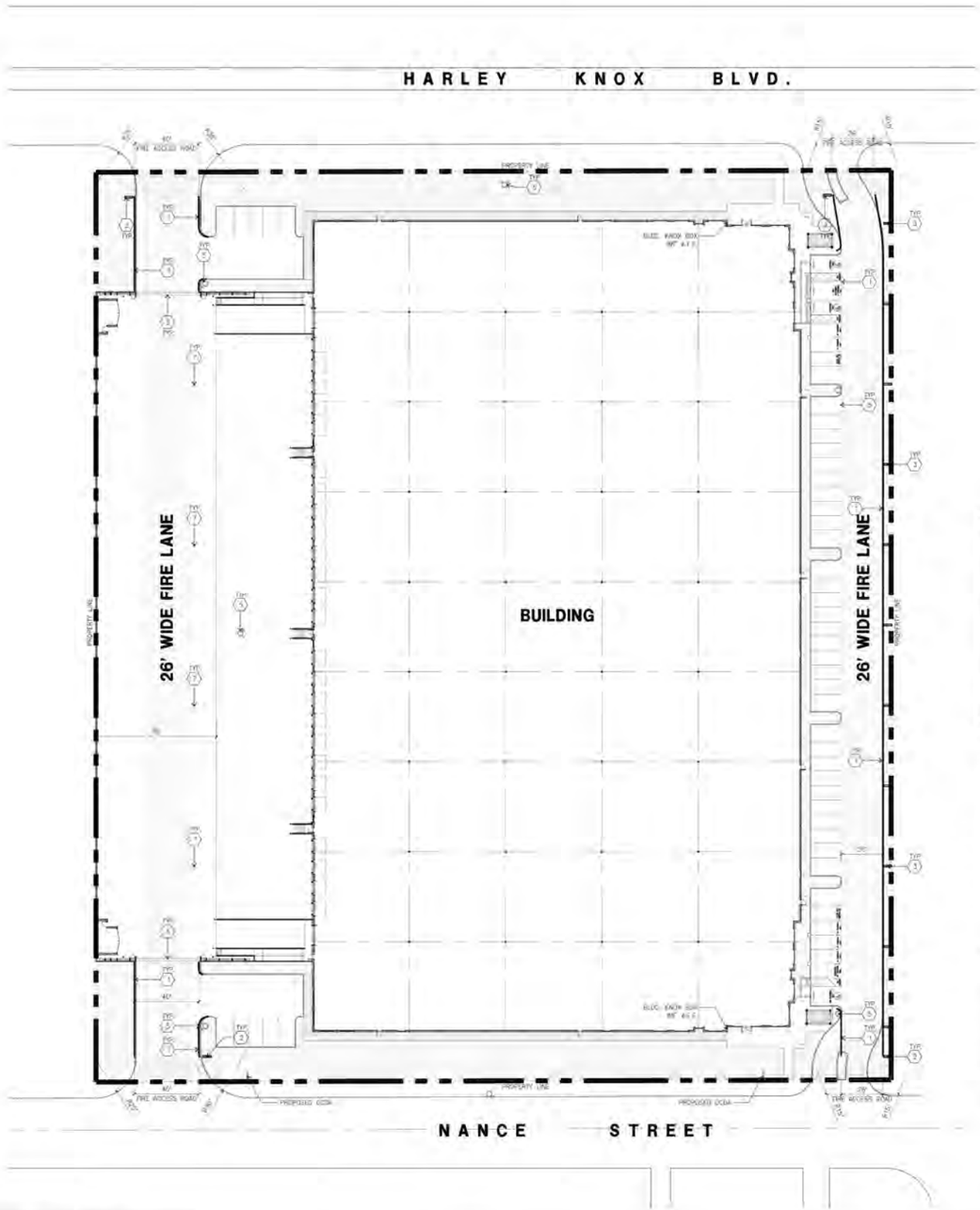
Harley Knox Boulevard along the northern Project site frontage is currently built to its ultimate General Plan roadway designation, and the existing traffic control and lane geometrics would be maintained. Frontage improvements along this roadway would be installed (e.g., access driveways, street lights, sidewalks, landscaping) as required by the PVCCSP. Nance Street would be improved to its ultimate half-section width as a Local street (60-foot right-of-way) adjacent to the Project site. A 30-feet-wide pavement section would also be constructed a short distance west of the Project site (approximately 200 feet). The roadway would be constructed consistent with the requirements outlined in the PVCCSP and the City of Perris General Plan Circulation Element. Internal site circulation would comply with applicable City and Riverside County emergency access requirements. The Project's Fire Access Plan is presented on Exhibit 7.

NON-VEHICULAR CIRCULATION

Section 4.2.2.3 of the PVCCSP contains Standards and Guidelines related to pedestrian access and onsite circulation and the Project has been designed to comply with applicable Standards and Guidelines. Sidewalks and landscaped parkways would be constructed along Harley Knox Boulevard and Nance Street. Additionally, to avoid potential conflicts with truck traffic, pedestrian pathways would be provided along the north and south sides of the proposed building to accommodate pedestrians walking between the overflow parking lots in the northwest and southwest corners of the building and the office spaces.

PARKING

The Project has been designed to comply with Section 4.2.2.4 of the PVCCSP and Chapter 19.69 of the City of Perris Zoning Ordinance related to parking requirements. As shown on Exhibit 3, automobile parking would be provided in the northwest and southwest corners and eastern portion of the site. A total of 54 automobile parking stalls, including standard and van American with Disabilities Act (ADA)-compliant stalls would be provided; 53 automobile parking stalls are required. Pursuant to Section 5.106.5.2 of the CalGreen Code, two of the parking spaces will be designated for low-emitting, fuel efficient, and carpool/vanpool vehicles. Pursuant to Section 5.106.5.3.2 of the CalGreen Code, seven parking spaces will be designated for the charging of electric vehicles (EV). Additionally, in compliance with existing requirements, bicycle parking would be provided at the northeastern and southeastern portions of the building.



NOTE:
FIRE ACCESS ROADWAYS SHALL BE DESIGNED, CONSTRUCTED AND MAINTAINED TO SUPPORT THE IMPOSED LOADS OF PERRIS FIRE APPARATUS WITH A TOTAL WEIGHT OF 68,000 POUNDS. APPARATUS WEIGHT IS DISTRIBUTED AS 45,000 POUNDS ON TANDEM REAR AXLES AND 22,000 POUNDS ON THE FRONT AXLE. THE SURFACE SHALL BE DESIGNED, CONSTRUCTED, AND MAINTAINED TO PROVIDE ALL-WEATHER DRIVING CAPABILITIES. A LETTER OR STATEMENT, WET-STAMPED AND SIGNED BY A REGISTERED ENGINEER, SHALL BE PROVIDED ON THE PLANS CERTIFYING THAT ANY NEW ROADWAY MEETS THIS 68,000-POUNDS, ALL WEATHER REQUIREMENT. ROAD BASE WITHOUT AN APPROPRIATE TOPPING OR BINDING MATERIAL DOES NOT SATISFY THE ALL-WEATHER REQUIREMENT.

FIRE KEYNOTES

1. FIRE LANE IDENTIFICATION - RED CURB
2. FIRE LANE ENTRANCE SIGN
3. FIRE LANE NO PARKING SIGN.
4. NOT USED
5. FIRE HYDRANT
6. MANUAL SLIDING GATE WITH KNOX PADLOCK
7. BLUE REFLECTIVE PAVEMENT MARKER

SITE LEGEND

- CONCRETE PAVING. SEE "C" DRWGS. FOR THICKNESS.
- STANDARD PARKING STALL (9' X 19')
- LANDSCAPED AREA
- 26' WIDE FIRELANE
- ACCESSIBLE PARKING STALL (11' X 19') W/ 5' ACCESSIBLE AISLE
- ACCESSIBLE PARKING STALL (VAN) (12' X 19') W/ 5' ACCESSIBLE AISLE
- PATH OF TRAVEL

PERRIS FIRE DEPARTMENT ACCESS AND WATER NOTES

INSPECTION REQUIREMENTS

1. PERRIS SITE INSPECTIONS ARE REQUIRED FOR THIS PROJECT. PLEASE SCHEDULE ALL FIELD INSPECTIONS AT LEAST 48HRS IN ADVANCE. INSPECTIONS CANCELED AFTER 1P. ON THE DAY BEFORE THE SCHEDULED DATE WILL BE SUBJECT TO A RE-INSPCTION FEE. CALL (951) 443-10299 TO SCHEDULE AN INSPECTION
2. A LUMBER DROP INSPECTION SHALL BE PERFORMED PRIOR TO BRINGING COMBUSTIBLE MATERIALS (OR COMBUSTIBLE FIXTURES AND FINISHED FOR STRUCTURES OF NON-COMBUSTIBLE CONSTRUCTION). ALL-WEATHER ACCESS ROADS CAPABLE OF SUPPORTING 68,000LBS., TOPPED WITH ASPHALT, CONCRETE, OR EQUIVALENT SHALL BE IN PLACE AND HYDRANTS OPERATIONAL AT TIME OF LUMBER DROP INSPECTION.
3. FOR PROJECTS WITH FUEL MODIFICATION, A VEGETATION CLEARANCE INSPECTION IS REQUIRED PRIOR TO A LUMBER DROP INSPECTION. USE THE FUEL MODIFICATION PLAN SERVICE REQUEST NUMBER TO SCHEDULE THE VEGETATION CLEARANCE INSPECTION.
4. PHASED INSTALLATION OF FIRE ACCESS ROADS REQUIRES ADDITIONAL INSPECTIONS NOT COVERED BY THE FEES PAID AT PLAN SUBMITTALS. CONTACT (951) 443-1029 TO ARRANGE FOR ADDITIONAL INSPECTIONS THAT MAY BE NEEDED AND ANY FEES THAT MAY BE DUE.
5. AN ORIGINAL APPROVED, SIGNED, WET-STAMPED PERRIS FIRE ACCESS & WATER PLAN SHALL BE AVAILABLE ON-SITE AT TIME OF INSPECTION.
6. ACCESS ROADS AND HYDRANTS SHALL BE MAINTAINED AND REMAIN CLEAR OF OBSTRUCTIONS AT ALL TIMES DURING AND AFTER CONSTRUCTION. AREAS WHERE PARKING IS NOT PERMITTED SHALL BE CLEARLY IDENTIFIED AT ALL TIMES. OBSTRUCTIONS OF FIRE LANES AND HYDRANTS MAY RESULT IN CANCELLATION OR SUSPENSION OF INSPECTIONS.
7. TEMPORARY FUEL TANKS OF 60 OR MORE GALLONS SHALL BE REVIEWED, INSPECTED, AND PERMITTED BY THE OFFICE OF THE FIRE MARSHAL, CITY OF PERRIS PRIOR TO USE.
8. THE PROJECT ADDRESS SHALL BE CLEARLY POSTED AND VISIBLE FROM THE PUBLIC ROAD DURING CONSTRUCTION.
9. ALL GATES IN CONSTRUCTION FENCING SHALL BE EQUIPPED WITH EITHER A KNOX OR BREAKAWAY PADLOCK.
10. BUILDING OF FOUR OR MORE STORIES SHALL BE PROVIDED WITH STAIRS AND A STANDPIPE BEFORE REACHING 40 FEET IN HEIGHT.

GENERAL REQUIREMENTS

11. FIRE LANE WIDTHS SHALL BE MEASURED FROM TOP FACE OF THE CURB TO TOP FACE OF THE CURB FOR FIRE LANES WITH STANDARD CURBS AND GUTTERS AND FROM FLOW-LINE TO FLOW-LINE FOR FIRE LANES WITH MODIFIED CURB DESIGNS (E.G., ROLLED, RAMPED, ETC). THE DEVELOPER IS RESPONSIBLE TO VERIFY THAT ALL APPROVED PUBLIC WORKS OR GRADING DEPARTMENT STREET IMPROVEMENT PLANS OR PRECISE GRADING PLANS CONFORM TO THE MINIMUM STREET WIDTH MEASUREMENTS PER THE APPROVED PERRIS FIRE DEPARTMENT ACCESS & WATER PLAN AND STANDARDS IDENTIFIED IN PERRIS FIRE DEPARTMENT ACCESS & WATER GUIDELINE FOR ALL PORTIONS OF THE FIRE ACCESS ROADS.
12. PERMANENT, TEMPORARY, AND PHASED EMERGENCY ACCESS ROADS SHALL BE DESIGNED AND MAINTAINED TO SUPPORT AN IMPOSED LOAD OF 68,000 LBS. AND SURFACED TO PROVIDE ALL-WEATHER DRIVING CAPABILITIES.
13. FIRE LANE SIGNS AND RED CURBS SHALL MEET THE SPECIFICATIONS SHOWN IN PERRIS FIRE DEPARTMENT ACCESS & WATER GUIDELINE AND SHALL BE INSTALLED AS DESCRIBED THEREIN. ADDITIONAL FIRE LANE MARKINGS MAY BE REQUIRED AT THE TIME OF INSPECTION DEPENDING ON FIELD CONDITIONS.
14. ALL FIRE HYDRANTS SHALL HAVE A "BLUE REFLECTIVE PAVEMENT MARKER" INDICATING THEIR LOCATION PER THE PERRIS STANDARD. ON PRIVATE PROPERTY MARKERS ARE TO BE MAINTAINED IN GOOD CONDITION BY THE PROPERTY OWNER.
15. ADDRESS NUMBERS SHALL BE LOCATED AND BE OF A COLOR AND SIZE SO AS TO BE PLAINLY VISIBLE AND LEGIBLE FROM THE ROADWAY FROM WHICH THE BUILDING IS ADDRESSED IN ACCORDANCE WITH PERRIS FIRE DEPARTMENT ACCESS & WATER GUIDELINE.
16. ACCESS GATES SHALL BE APPROVED PRIOR TO INSTALLATION AND SHALL BE IN COMPLIANCE WITH CHAPTER 5 OF THE CFC AND PERRIS FIRE DEPARTMENT ACCESS & WATER GUIDELINE.
17. APPROVED ACCESS WALKWAYS SHALL BE PROVIDED TO ALL REQUIRED OPENINGS AND ALL RESCUE WINDOWS.
18. VEGETATION SHALL BE SELECTED AND MAINTAINED IN SUCH A MANNER AS TO ALLOW IMMEDIATE ACCESS TO ALL HYDRANTS, VALVES, FIRE DEPARTMENT CONNECTIONS, PULL STATIONS, EXTINGUISHERS, SPRINKLER RISERS, ALARM CONTROL PANELS, RESCUE WINDOWS, AND OTHER DEVICES OR AREAS USED FOR FIREFIGHTING PURPOSES. VEGETATION OR BUILDING FEATURES SHALL NOT OBSTRUCT ADDRESS NUMBERS OR INHIBIT THE FUNCTIONING OF ALARM BELLS, HORNS, OR STROBES.
19. DUMPSTERS AND TRASH CONTAINERS LARGER THAN 1.5 CUBIC YARDS SHALL NOT BE STORED IN BUILDINGS OR PLACED WITHIN 5 FEET OF COMBUSTIBLE WALLS, OPENINGS OR COMBUSTIBLE ROOF EAVE LINES UNLESS PROTECTED BY AN APPROVED SPRINKLER SYSTEM.
20. ANY FUTURE MODIFICATION TO THE APPROVED FIRE DEPARTMENT ACCESS & WATER PLAN OR APPROVED SITE PLAN, INCLUDING BUT NOT LIMITED TO ROAD WIDTH, GRADE, SPEED HUMPS, TURNING RADII, GATES OR OTHER OBSTRUCTIONS, SHALL REQUIRE REVIEW, INSPECTION, AND APPROVAL BY THE OFFICE OF THE FIRE MARSHAL, CITY OF PERRIS.
21. APPROVAL OF THIS PLAN SHALL NOT BE CONSTRUED AS APPROVAL OF ANY INFORMATION OR PROJECT CONDITIONS OTHER THAN THOSE ITEMS AND REQUIREMENTS IDENTIFIED IN PERRIS FIRE DEPARTMENT ACCESS & WATER GUIDELINE AND RELATED PORTIONS OF THE CFC AND CBC. THIS PROJECT MAY BE SUBJECT TO ADDITIONAL REQUIREMENTS NOT STATED HEREIN UPON EXAMINATION OF ACTUAL SITE AND PROJECT CONDITIONS OR DISCLOSURE OF ADDITIONAL INFORMATION.
22. EMERGENCY RADIO COMMUNICATION ENHANCEMENT SYSTEM TO BE PROVIDED PRIOR TO CERTIFICATE OF OCCUPANCY. NO TENANT IS PROPOSED AT THIS TIME, SEPARATE PERMIT AND PLAN CHECKED REQUIRED FOR TENANT IMPROVEMENTS IN WHICH THAT TIME THE EMERGENCY RADIO COMMUNICATION SYSTEM WILL BE PROVIDED.

CONCRETE PAVEMENT SECTIONS (B)
scale: 1/4"=1'-0"

Source(s): HPA (01-18-2022)

Exhibit 7

Not to Scale

Fire Access Plan

2.2.3 LANDSCAPING AND AMENITIES, WALLS/FENCES, AND LIGHTING

LANDSCAPING AND AMENITIES

Landscaping would be provided on site, consistent with the Landscape Standards and Guidelines outlined in Section 6.0 of the PVCCSP. As shown on the Conceptual Landscape Plan provided on Exhibit 8, landscaping consisting of trees, shrubs, groundcover, and accents would be provided onsite, primarily along the perimeter of the site and on the sides of the buildings visible to the public. The landscape area would encompass approximately 12.6 percent of the site (approximately 35,342 sf), slightly exceeding the 12 percent landscape requirement included in the PVCCSP for Light Industrial uses. The proposed landscaping has been designed to meet or exceed applicable efficient irrigation requirements and would include, but not be limited to: plants with low water usage; a high-efficiency drip irrigation system, with minimal or no overhead spray sprinklers; and an evapotranspiration/weather-based smart controller using daily updated weather data.

The Project would also include PVCCSP-required employee amenities, including a patio/picnic area and exercise station. Trash enclosures would be provided in the northwest and southwest corners of the truck parking areas; the trash enclosures would be screened as required by the PVCCSP.

WALLS/FENCES

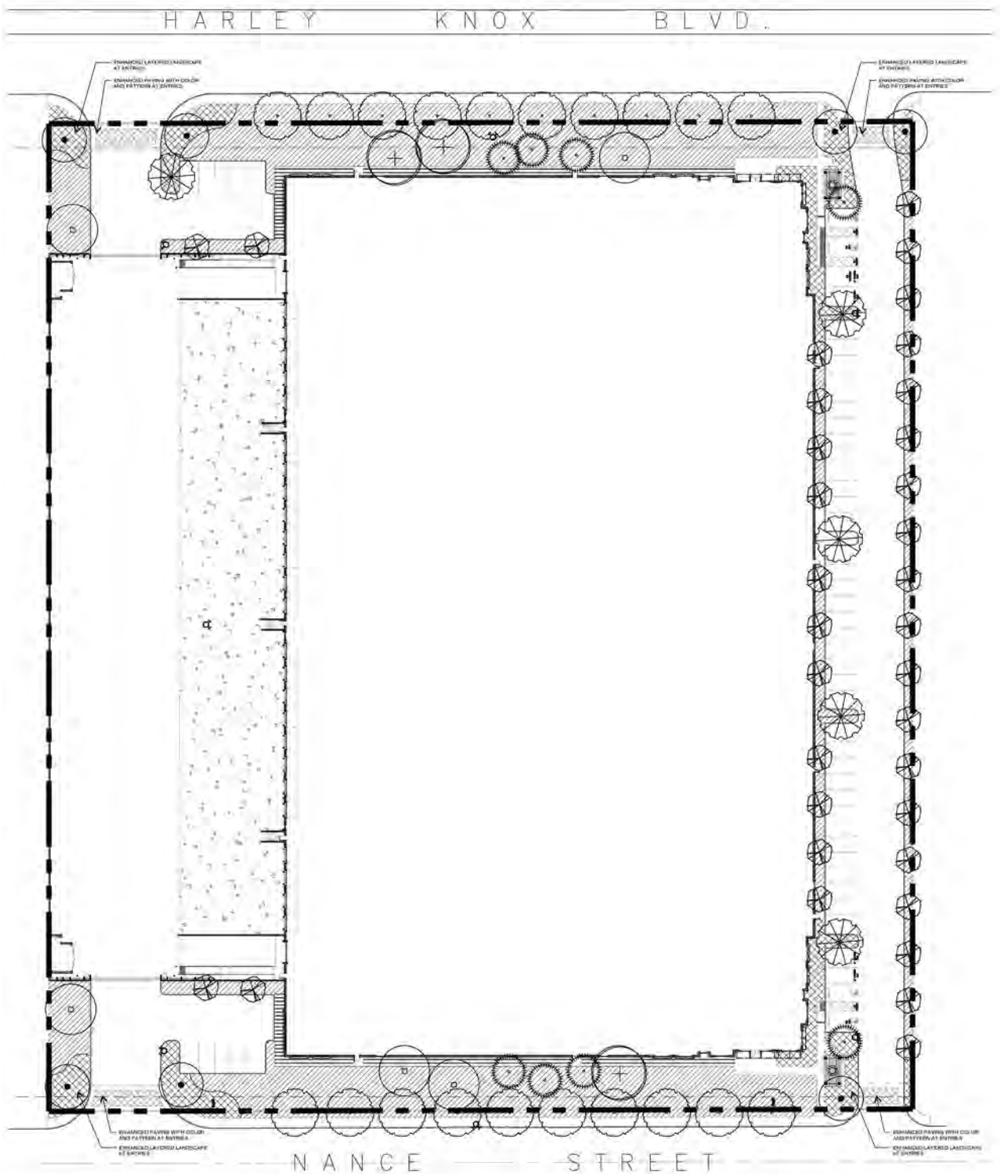
The location of proposed walls and fences is identified on Exhibit 9. A 14-foot-high screenwall would be provided along the western property boundary. Eight-foot-high screenwalls and metal gates would be provided at the north and south entrance to the truck court. It should be noted that if the existing non-confirming residence to the west of the Project site is no longer present when construction activities are initiated then the 14-foot-high screenwall could be replaced by an 8-foot-high metal fence. The property to the west has been purchased for redevelopment with industrial uses. Walls approximately 1.5 to 2.2 feet-high would be also constructed along the western property boundary along with the metal fence to address the grade difference of the Project site and the adjacent property.

LIGHTING

Section 4.2.4 of the PVCCSP addresses lighting Standards and Guidelines, including general lighting, decorative lighting standards, and parking lot lighting. The Project would comply with applicable lighting Standards and Guidelines, and with lighting standards established by the City of Perris, the CALGreen Code, and the Title 24 Energy Efficiency Standards. The Project would include installation of lighting within the parking areas and loading docks, along walkways, along Harley Knox Boulevard and Nance Street, and on the building for safety and security (refer to the conceptual lighting plan provided on Exhibit 10). A uniform site lighting design would be provided throughout the pedestrian and automobile parking areas, as well as in the secured truck yard area. Pursuant to the PVCCSP and the City's Municipal Code Section 19.02.110, lighting would be directed away from adjoining properties and the public right-of-way.

2.2.4 PROPOSED UTILITY INFRASTRUCTURE

Municipal and private utility services necessary to serve the Project are available in adjacent roadways or are available near the Project site. Onsite utility infrastructure necessary to serve the Project (including water, sanitary sewer, drainage, stormwater runoff treatment, and dry utilities) would be installed to serve the proposed development. The final sizing and design of utility infrastructure would occur during final Project design. Following is a description of existing and proposed utility infrastructure, which is conceptually depicted on Exhibit 11.



PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Cupaniopsis 'Desert Museum' Blue Fabio Verde	36" Box	7	L	Multi
	Chilopsis linearis Desert Willow	36" Box	8	L	Multi
	Chitalpa tashkentensis Chitalpa	36" Box	5	L	Standard
	Cinnamomum camphora Camphor Tree	24" Box	20	M	Standard
	Rhus lancea African Sumac	24" Box	5	L	Standard
	Ulmus parvifolia Chinese Elm	24" Box	3	L	Standard
	Tristania conferta Brisbane Box	15 Gal	34	M	Standard

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	SPACING	WUCOLS	REMARKS
	Acca sellowiana Pineapple Guava	5 Gal	3'	M	
	Dodonaea viscosa 'Purpurea' Hopseed Bush	5 Gal	4'	M	
	Leucophyllum f. 'Green Cloud' Texas Ranger	5 Gal	4'	L	
	Ligustrum j. 'Texanum' Texas Privet	5 Gal	3'	M	
	Rhamnus californica Coffeeberry	5 Gal	4'	L	
	Salvia greggii Autumn Sage	5 Gal	3'	L	
	Salvia l. 'Santa Barbara' Santa Barbara Sage	5 Gal	4'	L	
	Senna artemisioides Feathery Cassia	5 Gal	4'	L	
	Muhlenbergia capillaris Pink Muhly	1 Gal	3'	L	

GROUNDCOVER

SYMBOL	BOTANICAL/COMMON NAME	SIZE	SPACING	WUCOLS	REMARKS
	Acacia redolens 'Low Boy' Low Boy Trailing Acacia	1 Gal	8' O.C.	L	
	Festuca mairei Atlas Fescue	1 Gal	24" O.C.	M	Grass
	Lonicera j. 'Halliana' Hall's Honeysuckle	1 Gal	48" O.C.	L	
	Rosa 'Flower Carpet' Red Red Flower Carpet Rose	1 Gal	30" O.C.	L	
	Rosmarinus o. 'Huntington Carpet' Huntington Carpet Rosemary	1 Gal	48" O.C.	L	
	Sisyrinchium mandraliscae Blue Chiletricks	4" Pots	12" O.C.	M	

ACCENTS

SYMBOL	BOTANICAL/COMMON NAME	SIZE		WUCOLS	REMARKS
	Agave 'Blue Glow' Blue Glow Agave	5 Gal		L	
	Agave vilmoriniana Octopus Agave	5 Gal		L	
	Aloe striata Coral Aloe	1 Gal		L	
	Dasylirion wheeleri Desert Spoon	5 Gal		L	
	Hesperaloe parviflora Red Yucca	5 Gal		L	
	Lantana 'New Gold' Compact Gold Lantana	1 Gal		L	

SET IN 3/4" DECORATIVE GRAVEL

NOTES:
LANDSCAPE REQUIRED 12% - LANDSCAPE PROVIDED 12.6%
PARKING LOT TREES REQUIRED - 9
PARKING LOT TREES PROVIDED - 23
PARKING LOT TREES 36" BOX REQUIRED - 7
PARKING LOT TREES 36" BOX PROVIDED - 8

3" layer decomposed granite over filter fabric

Source(s): Hunter Landscape (12-27-2021)

Exhibit 8

Not to Scale

Conceptual Landscape Plan

SITE PLAN KEYNOTES

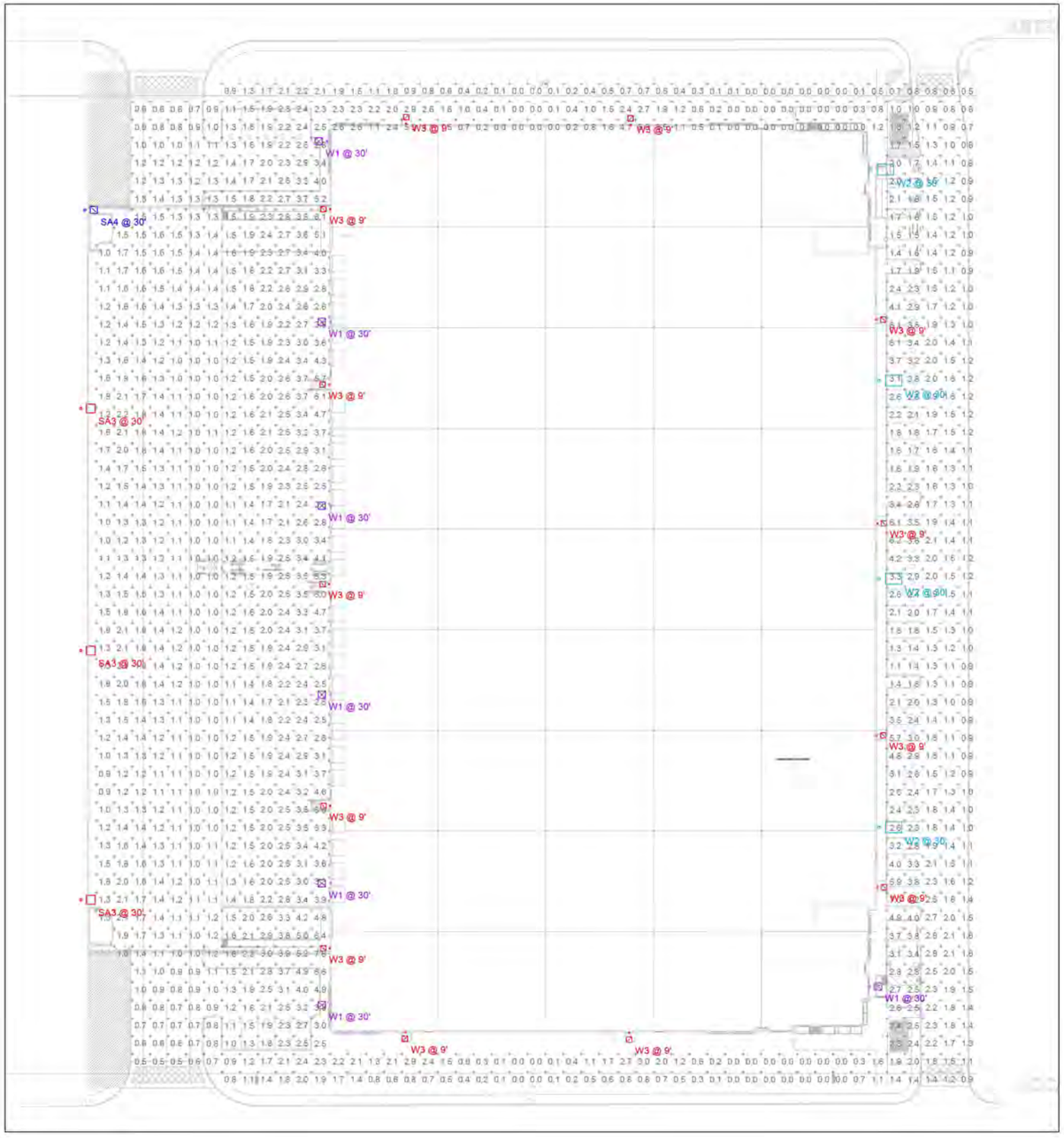
1. HEAVY BROOM FINISH CONCRETE PAVEMENT.
2. ASPHALT CONCRETE (AC) PAVING.
3. CONCRETE WALKWAY, MEDIUM BROOM FINISH
4. DRIVEWAY APRONS TO BE CONSTRUCTED PROVIDE DECORATIVE COLORED PAVEMENT
5. 5'-6"X5'-6"X4" THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY AS REQ. BY CITY INSPECTOR.
6. APPROXIMATE LOCATION OF TRANSFORMER. CONTRACTOR TO VERIFY WITH S.C.E.,
7. PROVIDE 8' HIGH METAL GATES W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
8. CONCRETE RAMP W/ 42" HIGH CONCRETE WALL.
9. EXTERIOR BIKE RACK TYPICAL.
10. 14' HIGH CONCRETE TILT-UP SCREEN WALL. DECORATIVE PILASTERS TO BE PLACED EVERY 100 FEET.
11. EXTERIOR CONCRETE STAIR.
12. CONCRETE CURB. SEE CIVIL DRAWINGS.
13. LANDSCAPE & HARDSCAPE. ALL LANDSCAPE & HARDSCAPE AREAS INDICATED BY SHADING.
14. PATIO AREA.
15. PRE-CAST CONCRETE WHEEL STOP.
16. CONCRETE FILLED GUARD POST "6 DIA. U.N.O. 42" H,
17. TRASH ENCLOSURE PER CITY STANDARD. SEE DAB-A4.1 FOR DETAILS.
18. ACCESSIBLE ENTRY SIGN.
19. ACCESSIBLE PARKING STALL SIGN.
20. TRUNCATED DOME.
21. APPROXIMATE LOCATION OF FIRE HYDRANT.
22. WALL MOUNTED LIGHTING FIXTURE.
23. SITE LIGHT POLE W/ CONCRETE BASE.
24. 8' HIGH METAL SWING GATE W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
25. 8' HIGH METAL FENCE. SEE DAB-A4.1 FOR DETAILS.
26. DESIGNATED SMOKING AREA.
27. NOT USED
28. RAISED PLANTER
29. WALKWAY WITH DG PAVING

Source(s): HPA (01-18-2022)

Exhibit 9

Not to Scale

Conceptual Wall and Fence Plan

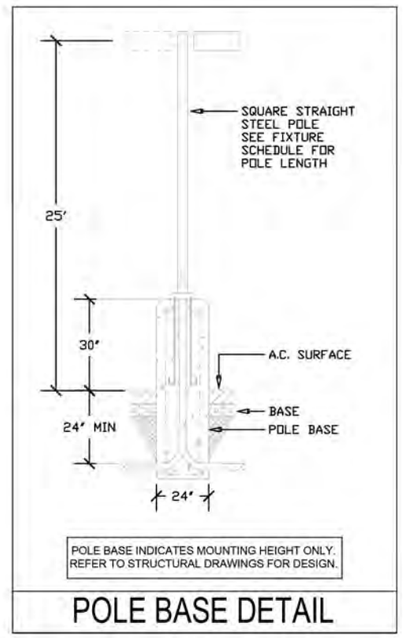


Schedule

Symbol	Label	Image	QTY	Manufacturer	Catalog Number	Description	Lamp	Number Lamps	Filename
	W3		13	U.S. ARCHITECTURAL LIGHTING	RZR-WM1-PLED-III-W-20LED-525mA-27 KEM1 BUG RATING B1 U0 G2 WALL MT AT 9 FT AFG	CAST BLACK PAINTED FINNED METAL HOUSING.	20 WHITE LIGHT EMITTING DIODES (LEDS), BASE UP.	20	RZR-WM1-PLED-III-W-20LED-525mA-NW.ies
	W2		4	U.S. ARCHITECTURAL LIGHTING	VLL-PLED-III-W-80LED-525mA-27 K WAKK MT AT 30 FT AFG BOG RATING B3 U0 G3	CAST BLACK PAINTED FINNED METAL HOUSING.	80 WHITE LIGHT EMITTING DIODES (LEDS), BASE UP.	80	VLL-PLED-III-W-80LED-525mA-WW.ies
	SA3		3	U.S. ARCHITECTURAL LIGHTING	VLL-PLED-III-W-80LED-525mA-NW-HS POLE MT AT 30 FT AFG BUG RATING B1 U0 G3	CAST BLACK PAINTED FINNED METAL HOUSING.	80 WHITE LIGHT EMITTING DIODES (LEDS), BASE UP.	80	VLL-PLED-III-W-80LED-525mA-NW-HS.ies
	W1		7	U.S. ARCHITECTURAL LIGHTING	VLL-PLED-IV-80LED-700mA- 27 K BUG B3 U0 G3 WALL MT AT 30 FT AFG	CAST BLACK PAINTED FINNED METAL HOUSING.	80 WHITE LIGHT EMITTING DIODES (LEDS), BASE UP.	80	VLL-PLED-IV-80LED-700mA-WW.ies
	SA4		1	U.S. ARCHITECTURAL LIGHTING	VLL-PLED-IV-FT-80LED-525mA-27K-HS POLE MT AT 25 FT AFG BUG RATING B1 U0 G3	CAST BLACK PAINTED FINNED METAL HOUSING.	80 WHITE LIGHT EMITTING DIODES (LEDS), BASE UP.	80	VLL-PLED-IV-FT-80LED-525mA-WW-HS.ies

Statistics

Description	Symbol	Avg	Max	Min	Max/Min	Avg/Min
Calc Zone #2		1.7 fc	7.6 fc	0.0 fc	N/A	N/A



POLE BASE INDICATES MOUNTING HEIGHT ONLY. REFER TO STRUCTURAL DRAWINGS FOR DESIGN.

POLE BASE DETAIL

DESIGN/BUILD NOTES:

THESE DRAWINGS AND SPECIFICATIONS ARE PART OF A PRESENTATION FOR A PROPOSED CONTRACT AND ARE THE PROPERTY OF AND COPYRIGHT BY MAMMOTH ELECTRIC. THESE PLANS SHALL NOT BE USED, IN WHOLE OR IN PART, BY ANY ONE OTHER THAN MAMMOTH ELECTRIC. THESE PLANS REPRESENT A SCHEMATIC DESIGN/BUILD LAYOUT OF THE ELECTRICAL SYSTEM(S). THESE PLANS MAY NOT INDICATE ALL MATERIALS THAT WILL BE REQUIRED TO PROVIDE A COMPLETE AND OPERATING ELECTRICAL SYSTEM(S).

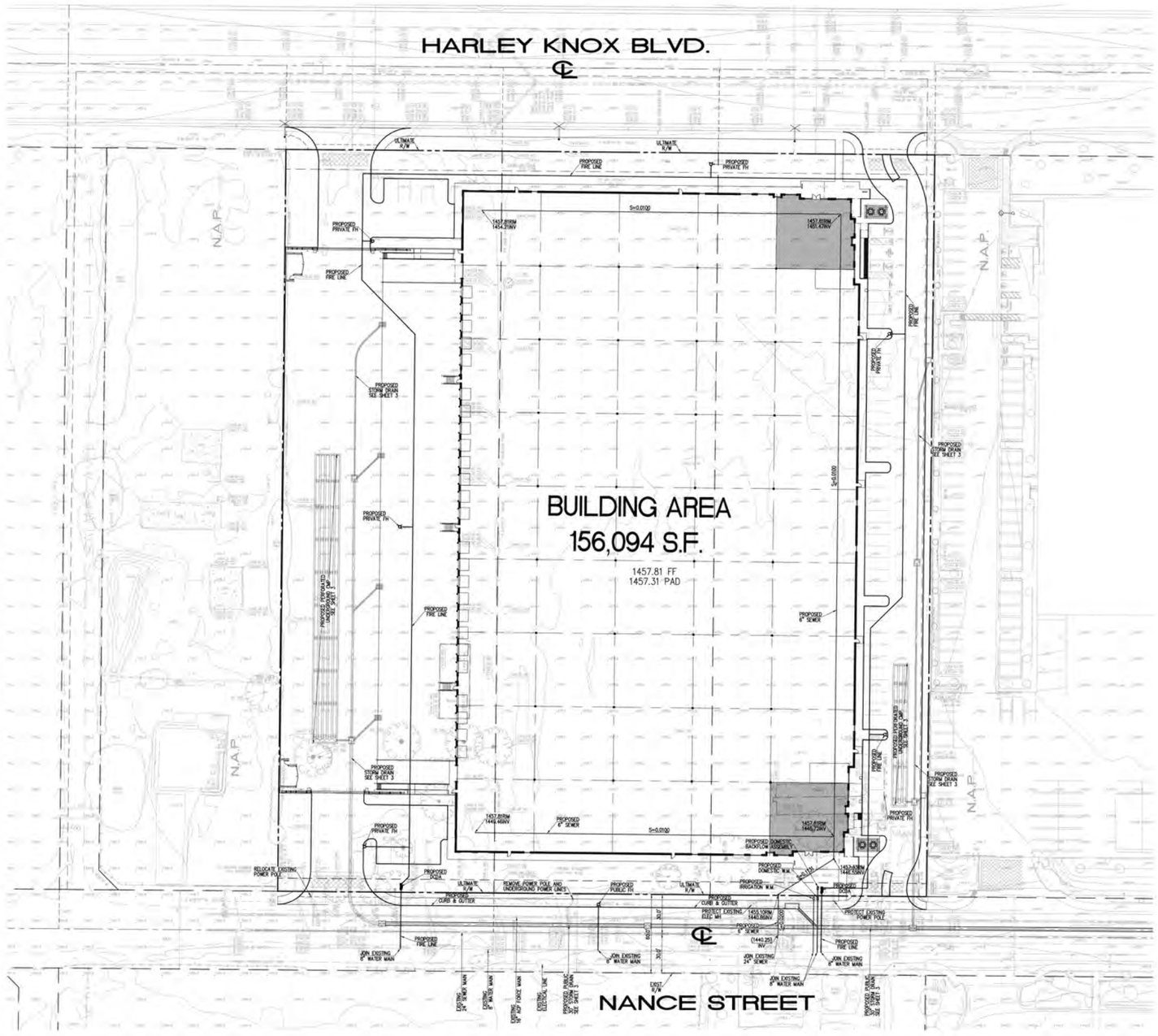
THESE PLANS WERE PREPARED UNDER THE EXEMPTION TO DIVISION 3 OF THE CALIFORNIA BUSINESS AND PROFESSIONS CODE BY SECTION 55372. AS THE LICENSED CONTRACTOR RESPONSIBLE FOR THE PREPARATION OF THESE DRAWINGS, ONLY MAMMOTH ELECTRIC MAY UTILIZE THEM.

Source(s): HPA, (12-01-2021)

Exhibit 10

Not to Scale

Conceptual Lighting Plan



Source(s): Thienes Engineering, Inc. (12-07-2021)

Exhibit 11

Not to Scale

Conceptual Utility Plan

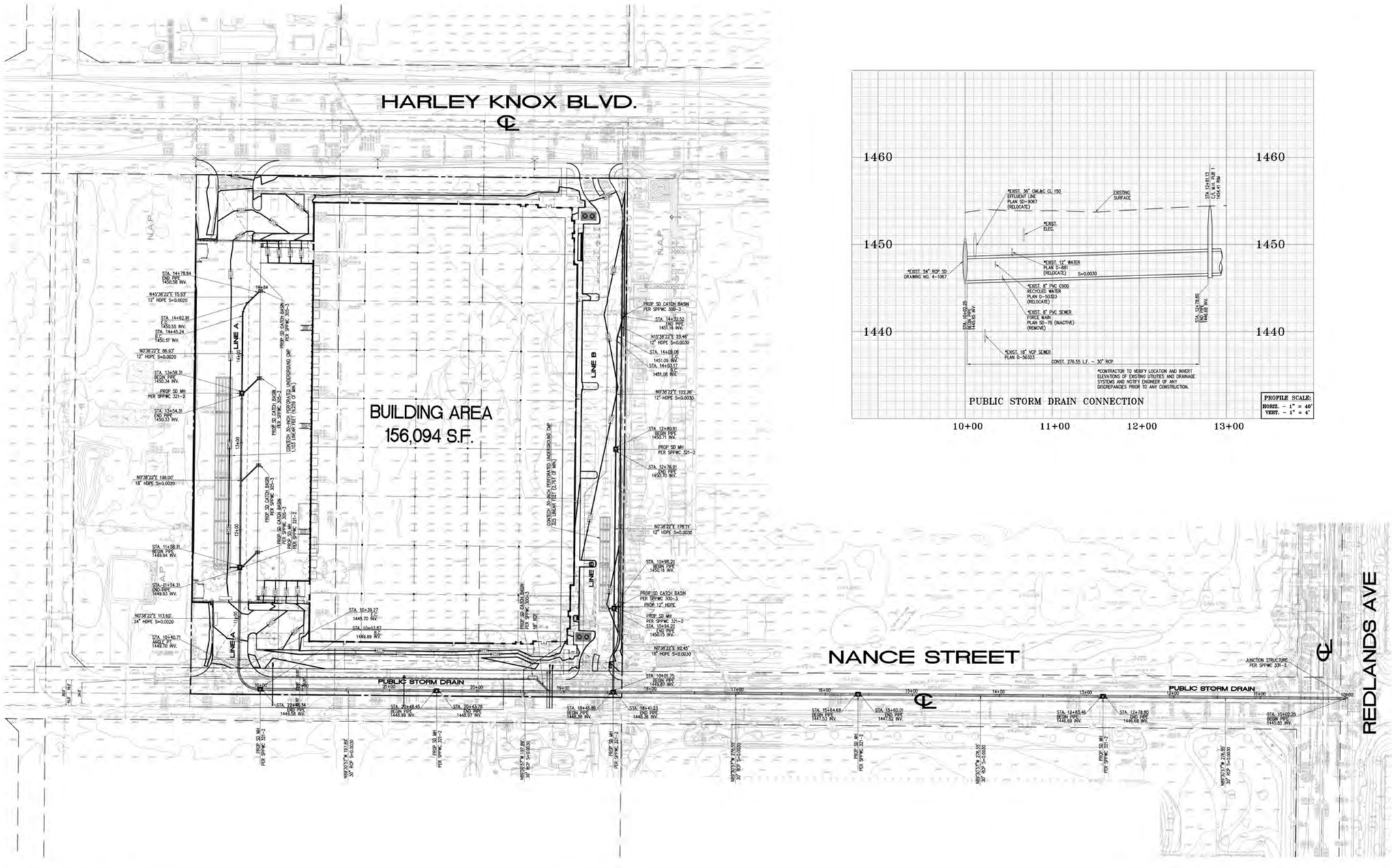
- **Water.** An existing 8-inch Eastern Municipal Water District (EMWD) water line is located in Nance Street. New lateral water lines for domestic water, irrigation and fire flow would be extended from the Project site to the existing water line in Nance Street. In addition, a second fire service connection would be provided from Harley Knox Boulevard to provide a fire loop.

- **Sewer.** There is an existing 24-inch EMWD sewer line in Nance Street and a new 6-inch lateral sewer line would be extended from the Project site to this sewer line.

- **Storm Drainage and Water Quality Features.** The Project's drainage plan (refer to Exhibit 12) has been designed so that the Project site generally drains in the same direction as the existing undeveloped condition (to the south). As shown in Exhibit 13, *Post-Construction BMP Site Plan*, runoff from the western portion of the building, the truck yard, and the parking lots in the northwest and southwest portion of the Project site would surface drain to several catch basins located within the western truck yard and then into the proposed underground infiltration chambers located in the western portion of the site for water quality treatment, discussed below. Runoff from the eastern portion of the building and the eastern parking lot would surface drain to two catch basins within the eastern parking lot and then into the proposed underground infiltration chambers located in the eastern portion of the site for water quality treatment. Proposed storm drain lines – Line A located on the western portion of the site and Line B, located on the eastern portion of the site – would convey stormwater to the south and then into a proposed public storm drain system beneath Nance Street, which would ultimately discharge the stormwater into the existing 54-inch public storm drain beneath Redlands Avenue, located east of the Project site (Lateral D-3). The proposed new public storm drain line in Nance Street would be installed as part of the Project. The public storm drain system would be sized to adequately convey runoff from the Project site and the future development of the adjacent property to the west. The proposed street-adjacent landscaping along Nance Street and Harley Knox Boulevard would surface drain offsite. Offsite runon from the property west of the Project site would be accommodated through the provision of drainage holes along the proposed wall along the western property boundary ranging in height from 1.5- to 2.2-feet-high. The stormwater would be directed southerly, similar to the existing condition.

  With respect to water quality treatment, roof and surface runoff would sheet flow into inlets where stormwater would be intercepted and diverted into the perforated corrugated metal pipes (CMPs) for water quality treatment. These systems would utilize infiltration as their primary form of treatment and would store stormwater runoff until it gradually exfiltrates into the underlying soil. Pollutant removal occurs through the infiltration of runoff and the adsorption of pollutants into the soil. This practice has high pollutant removal efficiency and can also help recharge groundwater.

- **Dry Utilities.** Southern California Edison (SCE) supplies electric power to the Project area and Charter Communications and Frontier Communications supply communications and data service. The Project would include installation of onsite dry utility infrastructure to connect with the existing infrastructure along Nance Street. SCE has existing electric facilities on the south side of Nance Street that would provide service to the Project. Existing 33 kilovolt (kv) overhead utilities would be placed underground as part of the Project and service to the building would be provided with a 4,000 ampere (AMP) underground pull section and a 2,000 AMP panel. Frontier Communications has existing conduit on the south side of Nance Street and the Project would connect to this existing infrastructure. The Project would not require natural gas for operations; therefore, no natural gas infrastructure would be installed as part of the Project.

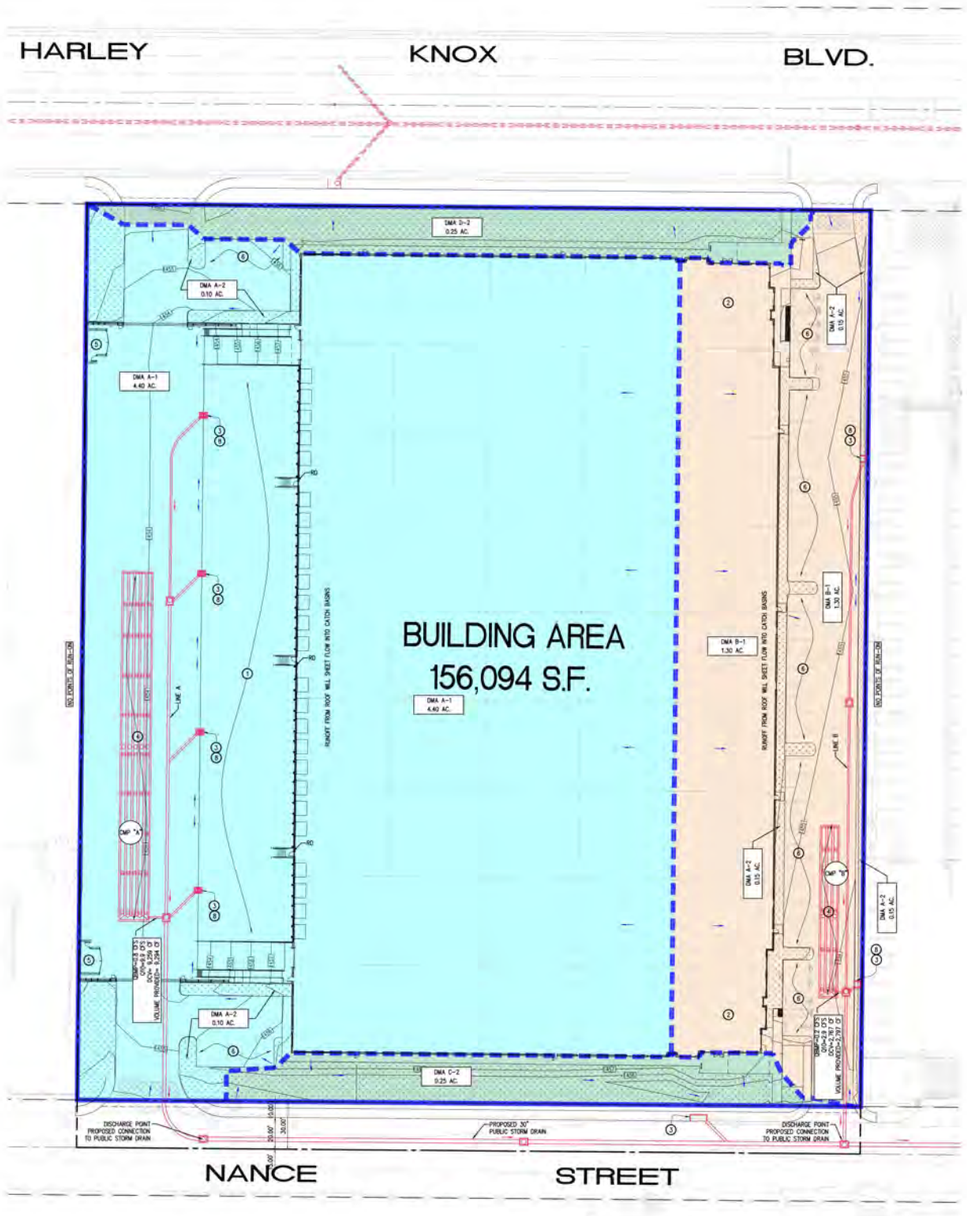


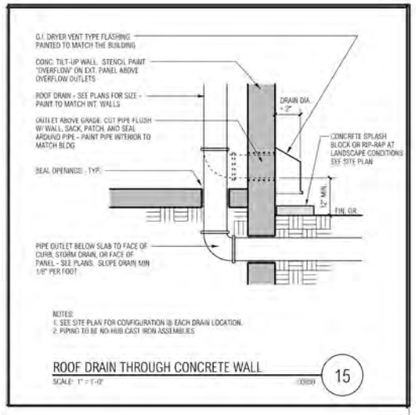
Source(s): Thienes Engineering, Inc. (12-07-2021)

Exhibit 12

Not to Scale

Conceptual Drainage Plan





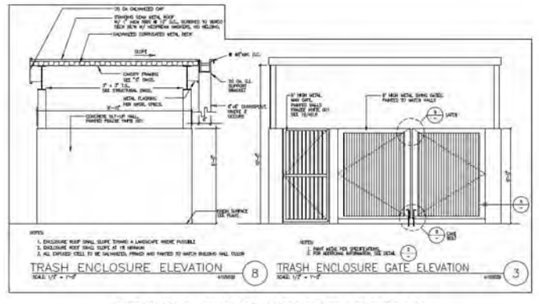
FLOWS FROM ROOF DRAINS SHEET FLOW INTO CATCH BASINS BEFORE BEING ROUTED TO THE UNDERGROUND CMP FOR TREATMENT

LEGEND

1. LOADING/UNLOADING TRUCK DOCKS
2. EDUCATIONAL MATERIAL/OFFICE
3. STORM DRAIN STENCIL
4. UNDERGROUND INFILTRATION GALLERY
5. TRASH ENCLOSURE
6. PARKING LOT MAINTENANCE (SWEEPING)
7. NOT USED
8. DRAIN INSERT(S)

NOTE:

BOUNDARY
SUBAREA
DMA A
DMA B
SD FLOW DIRECTION
SURFACE FLOW DIRECTION
LANDSCAPE/EFFICIENT IRRIGATION
RD ROOF DRAIN



TRASH ENCLOSURE DETAIL

SAMPLE STORM DRAIN STENCIL

DMA Name or ID	Surface Type(s)[1]	Area (Sq. Ft.)	Area (Acres)	DMA Type
A-1	Roofs/Conc/Asphalt	191,664	4.40	Type D
A-2	Ornamental Landscaping	4,356	0.10	Type D
B-1	Roofs/Conc/Asphalt	56,628	1.30	Type D
B-2	Ornamental Landscaping	6,534	0.15	Type D
C-2	Ornamental Landscaping	10,890	0.25	Type A
D-2	Ornamental Landscaping	10,890	0.25	Type A

Source(s): Thienes Engineering, Inc. (12-06-2021)

Exhibit 13

Not to Scale

Post-Construction BMP Site Plan

2.2.5 CONSTRUCTION ACTIVITIES

For purposes of analysis in this Initial Study, it is expected that construction of the Project would occur in one phase over an approximate 13-month period. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines.[2] The following construction activities would occur at the Project site (with the estimated duration for purposes of analysis): site preparation (approximately 10 days), grading (approximately 20 days), building construction (approximately 230 days), storm drain construction (approximately 50 days concurrent with building construction); paving (approximately 20 days), and architectural coating (approximately 20 days).

Construction of the Project would require common construction equipment. The site-specific construction fleet may vary due to specific needs at the time of construction; however, a summary of construction equipment assumptions by construction phase used for purposes of analysis in this Initial Study is provided in Table 2-1. Consistent with industry standards and typical construction practices, each piece of equipment is estimated to operate 8 hours per day or more than two-thirds of the period during which construction activities are allowed pursuant to the City's Municipal Code.

TABLE 2-1 CONSTRUCTION EQUIPMENT ASSUMPTIONS

Phase Name	Equipment[1]	Amount	Hours Per
Site Preparation	Crawler Tractors	4	8
	Rubber Tired Dozers	3	8
Grading	Crawler Tractors	3	8
	Excavators	1	8
	Graders	1	8
	Rubber Tired Dozers	1	8
Building Construction	Cranes	1	8
	Crawler Tractors	3	8
	Forklifts	3	8
	Generator Sets	1	8
	Welders	1	8
Storm Drain Construction	Air Compressors	1	8
	Cranes	1	8
	Loader	1	8
	Pump	1	8
	Soil Compactor	1	8
	Trench Digger	2	8
Paving	Pavers	2	8

[2] As shown in CalEEMod User's Guide Version 2020.4.0, Section 4.3 "Offroad Equipment", as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

Phase Name	Equipment[1]	Amount	Hours Per
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

Source: (Urban Crossroads, 2022a, Table 3-4)

Construction of the Project would involve mass grading of the entire site (refer to the conceptual grading plan provided on Exhibit 14).

Earthwork quantities include approximately 12,641 cubic yards (cy) of cut and approximately 12,641 cy of fill, resulting in balanced earthwork onsite; no import or export of soil from the Project site is anticipated. Required offsite improvements that would be constructed as part of the Project include completion of roadway and site frontage improvements (e.g., street lights, sidewalks, landscaping) along Nance Street, and site frontage improvements along Harley Knox Boulevard. Utility infrastructure would be installed onsite and would connect to existing utility lines in Nance Street. As previously identified, the Project also requires installation of a public storm drain line beneath the Project site's frontage with Nance Street extending to Redlands Avenue. Construction staging would occur within the Project impact limits and would be located the farthest distance feasible from any existing residential uses. The Project's construction impact area is depicted on Exhibit 15.

Construction workers would travel to the Project area by passenger vehicle and materials deliveries would occur by medium- and heavy-duty trucks.

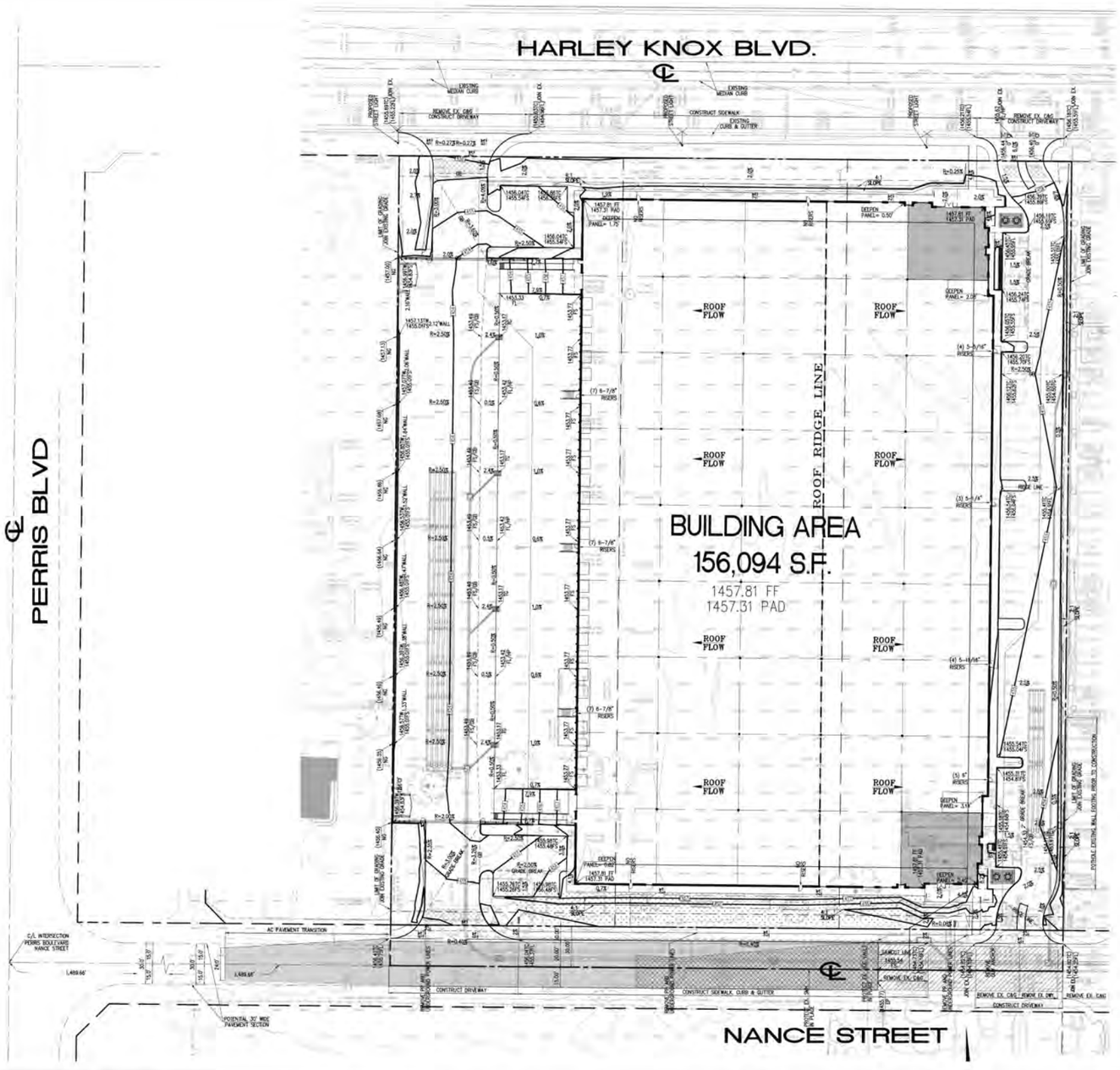
2.2.6 OPERATIONAL CHARACTERISTICS

At the time this Initial Study was prepared, the future occupants of the proposed building were unknown. The Project Applicant expects that the building would be occupied by high-cube warehouse distribution operators. The building is not designed or proposed to accommodate any warehouse cold storage or refrigerated uses. For purposes of evaluation in this Initial Study, the Project is assumed to be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night. As further discussed in Population and Housing section of this Initial Study, it is estimated that the Project would generate approximately 152 employment opportunities.

Project truck traffic would be required to use Harley Knox Boulevard, which is a City-designated truck route, to access I-215. Signage would be posted on site directing truck drivers to use the existing City truck routes.

2.3 SUMMARY OF REQUESTED ACTIONS

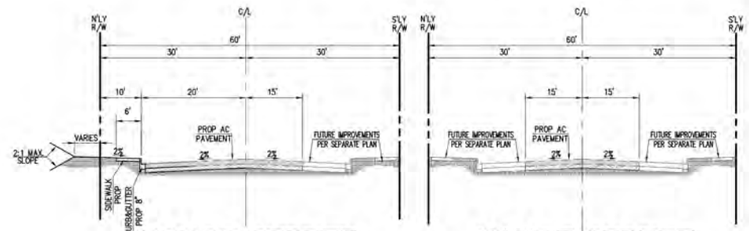
The City of Perris has sole approval responsibility for the Project. As such, the City serves as the Lead Agency pursuant to State CEQA Guidelines Section 15050. Pursuant to Section 13.0, Implementation and Administrative Process, of the PVCCSP, the City's Planning Commission is the decision-making authority for the Project Applicant's requested discretionary applications. The Planning Commission will make a decision regarding adoption of the MND, and whether to approve, approve with changes, or deny the Project. The Planning Commission decision may be appealed to the City Council. In the event of approval of the Project and adoption of the MND, the City would subsequently conduct administrative reviews and grant ministerial permits and approvals to implement Project requirements and conditions of approval.



EARTHWORK BALANCE CALCULATIONS

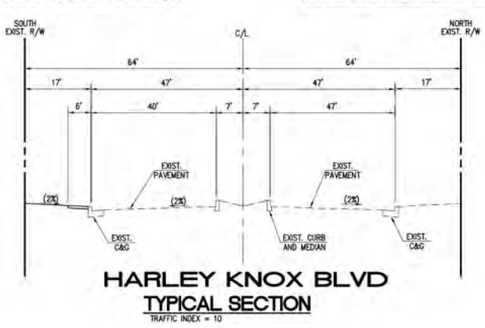
PROJECT: Nance Street
JOB# 3951

K.	SITE AREA:	280,238	SF
L.	SUBSIDENCE FACTOR:	0.125	
M.	SHRINKAGE FACTOR:	10.00	%
N.	SITE STRIPPING FACTOR:	0	
O.	OVEREXCAVATION:	28,289	CY
A.	CALCULATED CUT:	9,366	CY
B.	FOOTING AND UTILITY SPOILS	2,025	CY
B1.	UNDERGROUND CHAMBERS	1,250	
C.	**TOTAL CUT: (A+B)**	12,641	CY
D.	CALCULATED FILL:	7,251	CY
E.	LIGHT PAVING FILL:	-	CY
F.	SUBSIDENCE: (LxK)/27=	1,297	CY
G.	SHRINKAGE: (M/100)C=	1,264	CY
H.	SITE STRIPPING	-	
I.	OVEREXCAVATION SHRINKAGE	2,829	CY
J.	**TOTAL FILL: (D+E+F+G+H)=**	12,641	CY
K.	TOTAL	(0)	



NANCE STREET
TYPICAL SECTION
at Project Frontage

NANCE STREET
TYPICAL SECTION
from Perris Blvd. to Project



HARLEY KNOX BLVD
TYPICAL SECTION
TRAFFIC INDEX = 10

LEGEND:

- 6" AC OVER 12" AB CLASS II
- GRIND AND OVERLAY EX. AC PVMT.
- REMOVE EX. AC PVMT.

Source(s): Thienes Engineering, Inc. (12-07-2021)

Exhibit 14

Not to Scale

Conceptual Grading Plan

Source(s): Esri, Nearmap Imagery (2021), RCTLMA (2021)

Exhibit 15

0 87.5 175 350
Feet

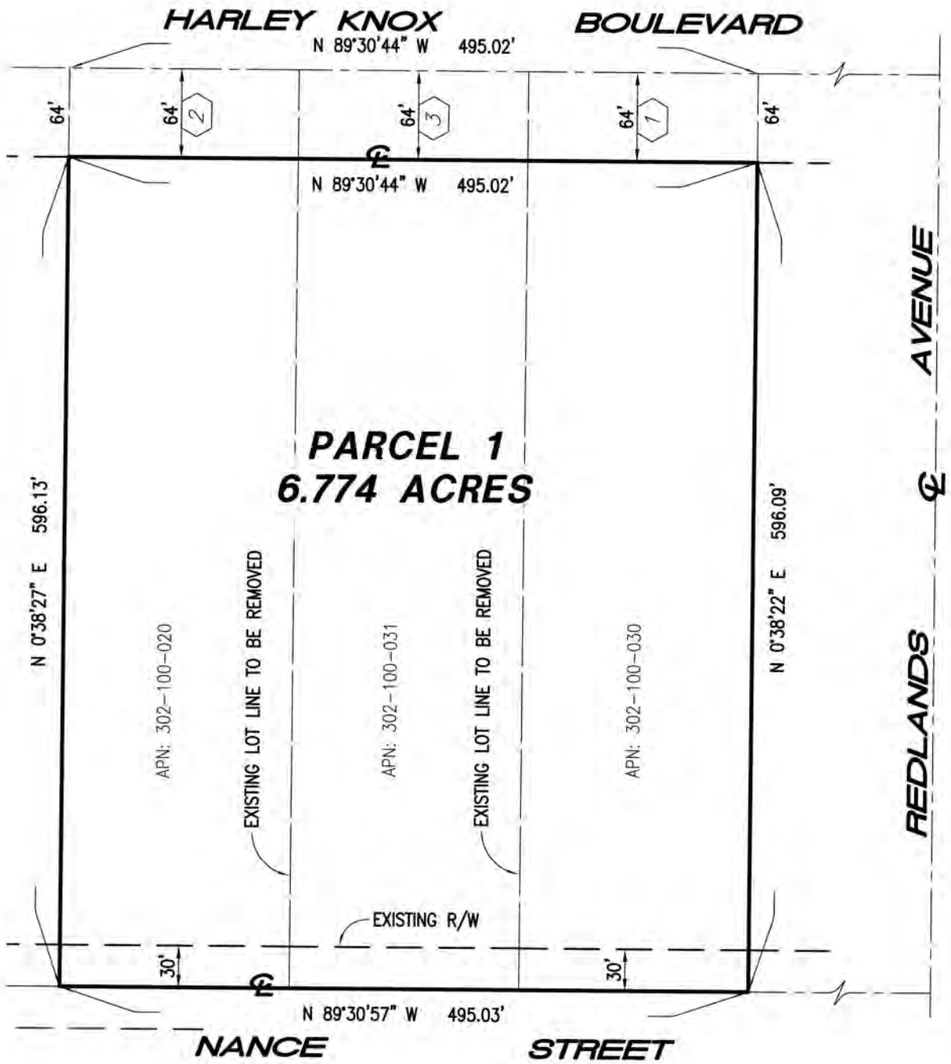
Construction Impact Area

This Initial Study/MND informs State, regional, and local government approvals needed for construction and/or operation of the Project, whether or not such actions are known or are explicitly listed. A list of the anticipated actions under City of Perris jurisdiction is provided in Table 2-2. In addition, additional actions may be necessary from other government agencies to fully implement the Project. Table 2-2 also lists the government agencies that may be required to use the Project's EIR during their consultation and review of the Project and its implementing actions, and provides a summary of the anticipated subsequent actions associated with the Project.

TABLE 2-2 PROJECT RELATED APPROVALS/PERMITS

Public Agency	Approvals and Decisions
Proposed Project – City of Perris Discretionary Approvals	
City of Perris Planning Commission	• Adoption of the Mitigated Negative Declaration No. 2366 for the Project in compliance with the requirements of CEQA. • Development Plan Review (DPR) to allow for the development of the Project site with an approximately 156,094-square-foot warehouse facility. (Case No. DPR 21-00006) • Parcel Merger to merge three existing parcels into one parcel (refer to Exhibit 16). (Case No. 21-05281)
Subsequent City of Perris Non-discretionary Approvals	
City of Perris	• Review and approval of offsite infrastructure plans, including street and utility improvements pursuant to the conditions of approval; • Review all onsite plans, including grading and onsite utilities; and • Approval of a Final Water Quality Management Plans (FWQMP) to mitigate post-construction runoff flows.
Other Agencies – Subsequent Approvals and Permits	
Regional Water Quality Board (RWQCB)	• Issuance of a Construction Activity General Construction Permit. • Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit.
Riverside County Flood Control & Water Conservation District (RCFC&WCD)	Encroachment permit to allow for a connection of the proposed storm drain in Nance Street to the existing public storm drain beneath Redlands Avenue, located east of the Project site.
Eastern Municipal Water District (EMWD)	Approval of water and sewer improvement plans.
Other Utility Agencies	Permits and associated approvals, as necessary for the installation of new utility infrastructure or connections to existing facilities.

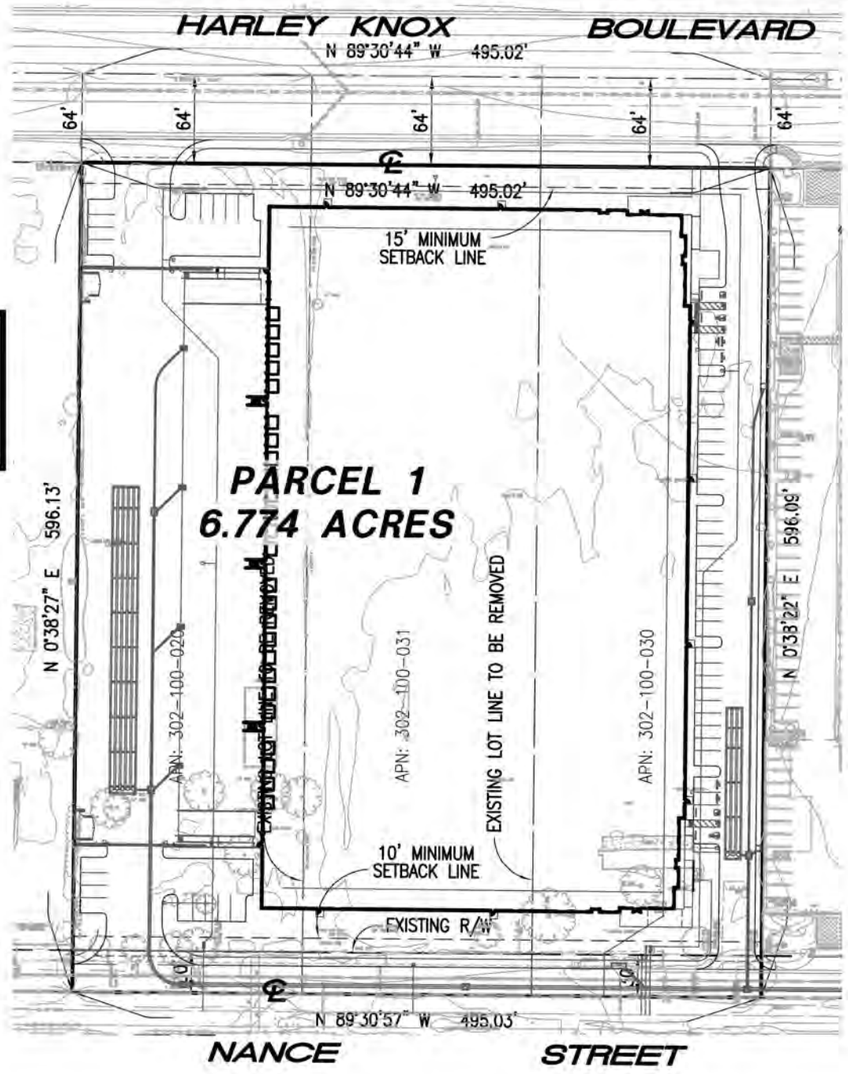
EXISTING PARCELS



LEGEND:

- NEW PROPERTY LINE
- EXISTING R/W LINE
- EXISTING LOT LINE
- CENTERLINE

PROPOSED PARCELS



Source(s): Thienes Engineering, Inc. (04-29-2021)

Exhibit 16

Not to Scale

Proposed Parcel Merger

2.4 DOCUMENTS INCORPORATED BY REFERENCE

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

- Perris Comprehensive General Plan 2030, City of Perris, originally approved on April 26, 2005 (Perris, 2005a)
- Perris General Plan 2030 Environmental Impact Report, SCH No. 2004031135, certified April 26, 2005 (Perris, 2005b)
- Perris Municipal Code for the City of Perris, adopted 1972 and amended through November 10, 2020 (City of Perris, 2021)
- Perris Valley Commerce Center Specific Plan, adopted January 10, 2012 and amended through January 2022 (City of Perris, 2012a)
- Perris Valley Commerce Center Final Environmental Impact Report, SCH No. 2009081086, certified January 10, 2012 (City of Perris, 2012b)

These reports/studies are available for review at:

General Plan and General Plan EIR:
https://www.cityofperris.org/departments/development-services/general-plan

Perris Municipal Code:
https://www.cityofperris.org/departments/development-services/municipal-code

Perris Valley Commerce Center Specific Plan and EIR:
https://www.cityofperris.org/departments/development-services/specific-plans

Public Service Counter, City of Perris Planning Division
135 North “D” Street, Perris, California 92570
(951) 943-5003; Hours: Monday–Friday, 8:00 AM to 6:00 PM.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is "Potentially Significant" as indicated by the checklist on the following pages:

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

DETERMINATION

On the basis of this initial evaluation:

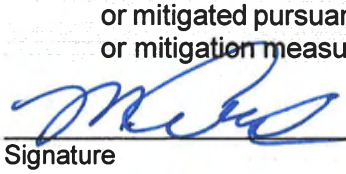
☐ I find that the Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION would be prepared.

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

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

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

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



Signature

4.5.2022

Date

Mathew Evans, Project Planner

City of Perris

SECTION 3.0 INITIAL STUDY

3.1 ENVIRONMENTAL CHECKLIST FORM

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

This analysis has been undertaken, pursuant to the provisions of CEQA, to provide the City of Perris with the factual basis for determining, based on the information available, the form of environmental documentation the Project warrants. The basis for each of the findings listed in the attached Form is explained in the Explanation of Checklist Responses following the checklist. References used to support the analyses are identified in the text and listed in Section 4.0, References, of this Initial Study.

ENVIRONMENTAL CHECKLIST FORM

City of Perris 135 North "D" Street, Perris, California 92570	
Project Title	Harley Knox Commerce Center Project (Case No. DPR 21-00006) (Project)
Lead Agency Name and Address	City of Perris Planning Division, 135 North "D" Street, Perris, California 92570
Contact Person and Phone Number	Mathew Evans, Project Planner, (951) 943-5003 ext. 115
Project Location	The Project site is located at 25264 E. Nance Street, south of Harley Knox Boulevard and north of Nance Street, generally between Las Palmas and Redlands Avenue, within the Perris Valley Commerce Center Specific Plan (PVCCSP) area, in the City of Perris, Riverside County (see Exhibit 1).
Project Sponsor's Name and Address	Proficiency Capital, LLC 11777 San Vicente Boulevard, Suite 780 Los Angeles, CA 90049 Contact: Matt Englhard, Vice President
General Plan Designation	Specific Plan – Perris Valley Commerce Center Specific Plan
Zoning	PVCCSP – Perris Valley Commerce Center Specific Plan; designated Light Industrial in the PVCCSP
Description of Project	Refer to Section 2.2 of this Initial Study. The Project would involve construction and operation of an approximately 156,094-square-foot industrial building to be used for warehouse and associated office functions on the approximately 6.4-acre Project site. Automobile parking spaces would be provided to comply with the off-street parking required by Section 19.69 of the Perris Zoning Ordinance. Refer to the Conceptual Site Plan provided on Exhibit 3. The Project has been designed in compliance with the Standards and Guidelines outlined in the PVCCSP. Landscaped streetscapes would be provided along Harley Knox Boulevard and Nance Street (north and south of the Project site, respectively), and landscaping would also be provided on site. The Project would include the installation of wet and dry utility infrastructure systems and roadway improvements on and off site to serve the proposed industrial use.

<table>
<tr><td colspan="2">City of Perris
135 North “D” Street, Perris, California 92570</td></tr>
<tr><td>Surrounding Land Uses and Setting</td><td>
<table>
<tr><th>Boundary</th><th>General Plan and Zoning/Specific Plan Designations</th><th>Existing Land Use</th></tr>
<tr><td>Eastern</td><td>Perris Valley Commerce Center Specific Plan/ Light Industrial</td><td>Industrial (warehouse)</td></tr>
<tr><td>Northern</td><td>Perris Valley Commerce Center Specific Plan/ Light Industrial</td><td>Harley Knox Boulevard and non-conforming residential uses with trailer storage</td></tr>
<tr><td>Southern</td><td>Perris Valley Commerce Center Specific Plan/ Light Industrial</td><td>Nance Street and non-conforming residential use with trailer storage</td></tr>
<tr><td>Western</td><td>Perris Valley Commerce Center Specific Plan/ Light Industrial</td><td>Undeveloped with vacant non-conforming residential use</td></tr>
</table>
</td></tr>
<tr><td>Other public agencies whose approval is required</td><td>• California Regional Water Quality Control Board
• Eastern Municipal Water District
• Riverside County Flood Control and Water Conservation District</td></tr>
</table>

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

The PVCCSP includes Standards and Guidelines relevant to aesthetics/visual character and lighting. These Standards and Guidelines summarized below are incorporated as part of the Project and are assumed in the analysis presented in this section. The chapters/section numbers provided correspond to the PVCCSP chapters/sections. No mitigation measures for aesthetics are included in the PVCCSP EIR.

Onsite Design Standards and Guidelines (From Chapter 4.0 Of The PVCCSP)

4.1 Perris Valley Commerce Center Onsite Development Standards

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

4.2 Onsite Standards and Guidelines

4.2.1 General Onsite Project Development Standards and Guidelines

- Uses and Standards Shall Be Developed in Accordance with the Specific Plan
- Uses and Standards Shall Be Developed in Accordance with City of Perris Codes
- Development Shall Be Consistent with the Perris Valley Commerce Center Specific Plan
- No Changes to Development Procedures Except as Outlined in the Specific Plan

4.2.2 Site Layout for Commerce Zones

- **4.2.2.1 Building Orientation/Placement:** Building Frontages/Entrances; Create Diversity and Sense of Community; and Utilize Building for Screening
- **4.2.2.2 Vehicular Access and Onsite Circulation:** Driveway Spacing; Minimize Vehicular Conflict; Access Points Easily Identifiable; Emergency Vehicle Access; Visual Link to Building and Entry; Primary Entry Drive/Location of Building; Landscape Parkways/Sides of Entry; Minimize Interactions; and Consideration of Large Truck Maneuverability
- **4.2.2.5 Screening:** Screen Loading Docks; Screening Methods; Screening of Outdoor Storage Areas, Work Areas, etc.
- **4.2.2.6 Outdoor Storage:** No Outdoor Storage Permitted Other Than as Specified

4.2.3 Architecture

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

4.2.4. Lighting

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

4.2.5 Signage Program

- **4.2.5.1 Sign Program:** Major Roadway Zones/Freeway Corridor; Location; Monument Signs; Address Identification Signage; and Prohibited Signs

4.2.6 Walls/Fences

- Specific Purpose
- Materials
- Avoid Long Expanses of Monotone Fence/Wall Surfaces

- Most Walls Not Permitted within Street Side Landscaping Setback
- Height
- Gates Visible from Public Areas
- Prohibited Materials

4.2.9 Visual Overlay Zone Development Standards and Guidelines

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

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

6.1 Onsite Landscape General Requirements

- Unspecified Uses
- Perimeter Landscape
- Street Entries
- Maintenance Intensive/Litter Producing Trees Discouraged
- Avoid Interference with Project Lighting/Utilities/Emergency Apparatus
- Scale of Landscape

6.1.1 Onsite Landscape Screening

- Plant Screening Maturity
- Screenwall Planting
- Trash Enclosures

6.1.2 Landscape in Parking Lots

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

6.1.3 Onsite Plant Palette

6.2 Offsite Landscape General Requirements

6.2.1 Streetscape Landscape

- Arterial
- Local

6.3 Planting Guidelines

All areas required to be landscaped shall be planted with groundcovers, shrubs, or trees selected from the Plant Palette Section 6.1.3 of the PVCCSP. The material shall be planted in the sizes identified in Section 6.3, and shall be in accordance with all City of Perris standards and minimum requirements.

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

8.2 Industrial Development Standards and Guidelines

8.2.1 Industrial Site Layout

- ***8.2.*1.1 Orientation/Placement:** Industrial Operations
- **8.2.1.4 Employee Break Areas and Amenities:** Outdoor Break Areas; and Additional Amenities for Buildings Exceeding 100,000 S.F.
- **8.2.1.5 Screening:** Truck Courts

8.2.2 Landscape

- No Landscape in Screened Truck Courts

EXPLANATION OF CHECKLIST ANSWERS

1a. **Less Than Significant Impact.** As identified in the PVCCSP EIR Initial Study (Section 13, Aesthetics), scenic vistas can be defined as the view of an area that is visually or aesthetically pleasing. Various vantage points within the City have views of Lake Perris Dam to the northeast, the Bernasconi Hills to the east, Gavilan Hills and the Motte-Rimrock Reserve to the west, and MARB/IPA to the north-east. A scenic vista can be impacted in two ways: (1) a development project can have visual impacts by either directly diminishing the scenic quality of the vista or (2) by blocking the view corridors or "vistas" of the scenic resource. The City of Perris is located within the Perris Valley, and the terrain is generally flat. According to the City's General Plan EIR (Section 6.1, Aesthetics),

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

The Project site is an undeveloped, relatively flat parcel surrounded by industrial uses to the east and southeast; a non-conforming residential use to the west; Nance Street, and a non-conforming residential use with truck trailer storage on the property to the south; Harley Knox Boulevard, and two non-conforming residences with truck trailer storage on the properties to the north; and vacant land to the northeast and northwest. The site is located along a Major Roadway Visual Corridor, Harley Knox Boulevard, as identified in the PVCCSP and would therefore comply with the Major Roadway Visual Corridor Development Standards and Guidelines. As further discussed below under Threshold 1c, the Project includes landscaped setbacks along Harley Knox Boulevard and Nance Street, which are both oriented in the east-west direction. The landscape setbacks from these roadways would preserve distant scenic views from these public roadways. Additionally, the Project would be developed in compliance with the Standards and Guidelines summarized above and identified in the PVCCSP to address visual character, including but not limited to the following:

- Chapter 4.0, Onsite Design Standards and Guidelines, which addresses building height restrictions and architecture

- Chapter 6.0, Landscape Standards and Guidelines, which provides landscape guidelines that would meet the City's development standards, further reducing the potential for visual impacts

- Chapter 8.0, Industrial Design Standards and Guidelines, which provides Design Standards and Guidelines for industrial uses

The Project would not have a substantial adverse effect on a scenic vista.

1b. **No Impact.** According to the City's General Plan EIR, no notable stands of native trees exist in the City and no impact is associated with development consistent with the General Plan. Further, as identified in the PVCCSP EIR Initial Study (Section 13, Aesthetics), no specific scenic resources such as trees, rock outcroppings, or unique features exist within the Specific Plan area, including the Project site. The Project site is not located along a State scenic highway. The nearest "Officially Designated" State scenic highway is State Route (SR) 243, located approximately 22 miles east of the Project site (Caltrans, 2018). SR-74, approximately 5.0 miles south of the Project site, is an Eligible State Scenic Highway (not officially designated) (Caltrans, 2018). Therefore, development of the Project would not affect views from a State scenic highway.

1c. **Less than Significant Impact.** Consistent with the conclusions of the PVCCSP EIR Initial Study (Section 13, Aesthetics), development of future projects in the Specific Plan area in compliance with the provisions of the PVCCSP, including the Project, would change the visual character of the individual sites and the Specific Plan area as viewed from surrounding vantage points. Exhibit 17 through Exhibit 21 present photographs that depict the existing visual character of the Project site and surrounding area. These photographs were taken from vantage points along the perimeter of the Project site. Existing public views of the Project site are limited to views from Harley Knox Boulevard and Nance Street; Nance Street is not improved along the majority Project site frontage. There is not a substantial number of people that have views of the site from these roadways; viewers would be limited to motorists or pedestrians on the existing sidewalks in the vicinity of the Project site.

View 1: From the Southeast Edge of the Project Site, along Nance St, looking Northwest.

Key Map

View 2: From the Southeast Corner of the Project Site, along Nance St, looking North.

Exhibit 17

Not to Scale

Site Photographs - Views 1-2

View 3: From the Southwest Corner of the Project Site, along Nance St, looking Northeast.

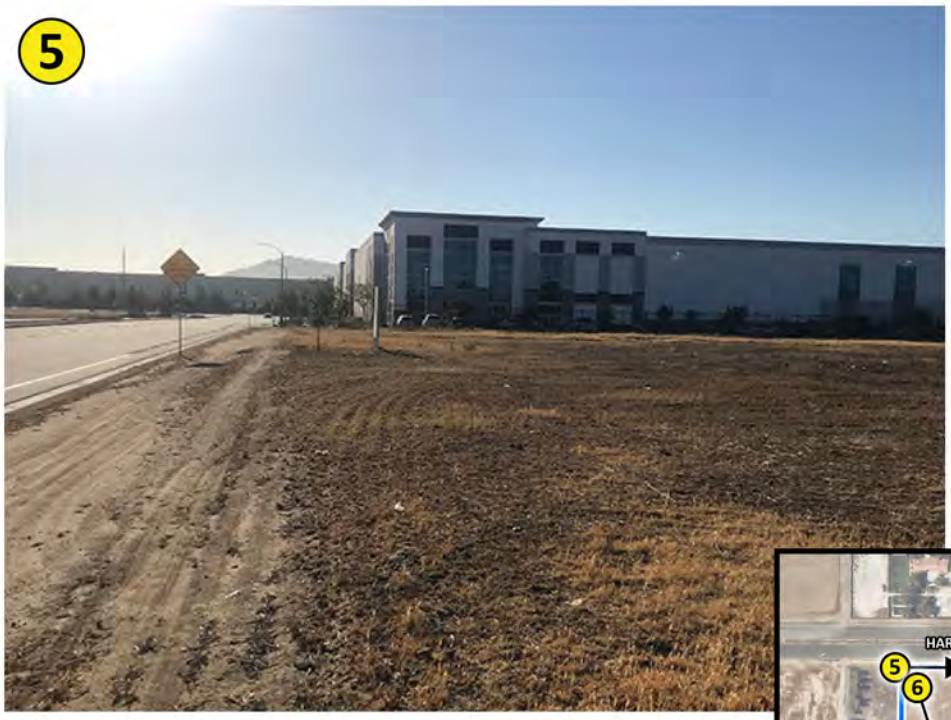
Key Map

View 4: From the Western Edge of the Project Site, looking East.

Exhibit 18

Not to Scale

Site Photographs - Views 3-4



View 5: From the Northwest Corner of the Project Site, along Harley Knox Blvd, looking East.

Key Map

View 6: From the Northwest Corner of the Project Site, along Harley Knox Blvd, looking Southeast.

Exhibit 19

Not to Scale

Site Photographs - Views 5-6

View 7: From the Northeast Corner of the Project Site, along Harley Knox Blvd, looking Southwest.

Key Map

View 8: From the Northwest Corner of the Project Site, along Harley Knox Blvd, looking West.

Exhibit 20

Not to Scale

Site Photographs - Views 7-8

View 9: Southeast of the Project Site, along Nance St, looking West.

Key Map

View 10: Southwest of the Project Site, along Nance St, looking East.

Exhibit 21

Not to Scale

Site Photographs - Views 9-10

Photographs presented on Exhibit 17 depict the visual character of the Project site from vantage points at the southeast corner of the Project site and are representative of existing public views from Nance Street. As shown, the Project site in the foreground is relatively flat with limited vegetation. Existing development and mature trees to the north of the Project site is visible in the background of Views 1 and 2, with obstructed views of mountains in the distant background. Exhibit 18 includes photographs that depict views from southwest of the Project site along Nance Street, which are representative of public views from this roadway. View 3 depicts the undeveloped Project site in the foreground, industrial warehouse buildings in the middleground, and the San Bernardino Mountains in the distant background. View 4 depicts a view looking east into the Project site from a vantage point north of Nance Street; this photo further depicts the relationship of the Project site to the industrial warehouse building adjacent to the site to the east. There are partially obstructed distant mountain views. Exhibit 19 includes photographs that depict views from northwest of the Project site along Harley Knox Boulevard, which are also representative of public views from this existing roadway. View 5 depicts the view looking east along Harley Knox Boulevard; an industrial warehouse building is visible in the middleground, and the San Bernardino Mountains in the distant background. View 6 depicts the undeveloped Project site in the foreground with background views of an industrial warehouse building and landscaping. The existing buildings and landscaping obstruct distance views from this vantage point. Exhibit 20 includes photographs that depict views from the northeast of the Project site along Harley Knox Boulevard, which are representative of public views from this existing roadway. View 7 depicts the Project site in the foreground with background views of the existing development and mature vegetation. View 8 depicts the view looking west along Harley Knox Boulevard; mature trees in this viewshed partially obstruct background views. Exhibit 21 includes photographs that depict views from offsite looking east and west along Nance Street. View 9 depicts the view looking west along Nance Street towards the Project site; existing industrial warehouses and associated landscaping along both sides of Nance Street are the primary focus from this viewshed. View 10 depicts the view looking east along (unimproved) Nance Street towards the Project site. Existing trees onsite along Nance Street and the truck trailer storage occurring on the property south of the Project site are prominent in the foreground. There are also distant views of the mountains to the east.

Development of the Project would involve the construction and operation of the following in an area that is currently undeveloped: an approximately 156,094-square-foot industrial warehouse building and associated truck trailer and automobile parking, landscaping, walls/fences, roadways, and infrastructure. Implementation of the Project would result in a permanent change in the visual character of the site from its current undeveloped condition to a developed industrial warehouse use, consistent with the change in visual character anticipated and analyzed in the PVCCSP EIR. The site would be developed in compliance with the Standards and Guidelines outlined in the PVCCSP. As identified above, Section 4.2.3 of the PVCCSP provides onsite Standards and Guidelines specifically related to architecture. As shown on Exhibit 5, which provides conceptual building elevations, the proposed building has been designed to comply with these requirements, including scale, massing, and building relief; architectural elevations and details; roofs and parapets; and color and materials. As shown, development of the Project would involve the construction of a single industrial building with a maximum height of 43.2 feet. The building has been designed with multiple areas of geometric form to provide variation in building plane and form. Visual relief from massive building form would be achieved through fenestration, through the incorporation of windows, and/or through variations in height and rooflines

as well as the use of parapets. These various architectural elements would effectively avoid monotony and repetition in building elevations.

As shown on Exhibit 8, landscaping would be installed along Harley Knox Boulevard and Nance Street, which form the Project site's northern and southern boundaries, respectively; and in the automobile parking areas. The landscaping along Harley Knox Boulevard and Nance Street would continue the streetscape that has been installed as part of the industrial developed east and southeast of the Project site, as shown on site photographs (refer to View 5 and View 9. The landscaping would provide a visual buffer between these public roadways and the proposed building and would help to visually screen views of proposed screenwalls and passenger parking and truck trailer parking areas. As shown on the Conceptual Site Plan, the Project would also include various hardscape elements throughout the Project site. Paving would consist of concrete, including decorative concrete paving (colored) at the access driveways along Harley Knox Boulevard and Nance Street.

The Standards and Guidelines outlined in the PVCCSP EIR identified previously have been developed to ensure aesthetic cohesiveness and superior architectural design and to improve the visual character within the Specific Plan area. The Project would be developed in compliance with these Standards and Guidelines and would be visually consistent with existing industrial development in the vicinity of the Project site. Therefore, although the Project would alter the site, it would not conflict with applicable zoning and other regulations governing scenic quality. This impact would be less than significant and no mitigation is required.

1d. **Less than Significant with Mitigation Incorporated.** As identified in the PVCCSP EIR Initial Study (Section 13, Aesthetics), implementation of allowed development within the Specific Plan area, including the Project, would introduce new sources of nighttime light and glare into the area from street lighting as well as outdoor lighting from Project-related uses. The Project site is currently undeveloped, and no sources of light exist at the Project site. Existing sources of light from the surrounding land uses include street lighting and exterior lighting from adjacent industrial uses. No buildings or other man-made features currently exist on site or near the Project site that are constructed of materials that cause substantial glare.

Construction and operation of the Project would introduce additional sources of lighting to the Project site. Lighting during construction could be provided throughout the night for security purposes. New permanent sources of light for operations would be introduced into the area in the form of signage, building lighting, and parking lot lighting for nighttime operations, security, and safety. Lighting in loading areas (areas generally directed away from the public view) would consist of building-mounted lighting. It is anticipated that lighting would be similar to that used in nearby warehouse uses.

The Project site is located approximately 40 miles northwest of Mount Palomar, and is therefore within Zone B of the Mount Palomar Nighttime Lighting Policy Area. Lighting at the Project site would be designed pursuant to the City's Municipal Code Section 19.02.110, which includes requirements for installation of energy-efficient lighting as well as shielding of parking lot lights to minimize spillover onto adjacent properties and right-of-way. The Project would also comply with lighting requirements contained in the PVCCSP, and in the PVCCSP EIR. Notably mitigation measure MM HAZ 3, further discussed the Hazards and Hazardous Materials section of this Initial Study, requires that outdoor lighting be hooded or shielded to prevent the spillage of lumens or

reflection into the sky or above the horizontal plane, to avoid impacts to operations at the MARB/IPA. Therefore, although the Project would introduce new lighting to the Project vicinity, the Project would comply with existing policies, and would not create a new source of substantial light. This impact would be less than significant and no mitigation is required.

During Project construction, nighttime lighting may be used within the construction staging areas to provide security for construction equipment. Due to the distance between the construction area and the nearby residential uses and motorists on adjacent roadways, such security lights may result in lighting towards aircraft and motorists. However, this potential impact would be reduced to a less than significant level through the City's standard project review and approval process and with implementation of mitigation measure MM 1-1.

Glare is caused by light reflections from pavement, vehicles, and building materials such as reflective glass and polished surfaces. During daylight hours, the amount of glare depends on intensity and direction of sunlight. Glare can create hazards to motorists and can be a nuisance for pedestrians and other viewers. The PVCCSP Standards and Guidelines related to colors and materials (Section 4.2.3.5) encourage the use of low-reflectant facades and prohibit metal siding where visible from the public. As identified in the building elevations presented on Exhibit 5, exterior surfaces of the proposed building would be finished with a combination of architectural coatings, trim, and/or other building materials (e.g., concrete). Windows would consist of low-reflective glass. Compliance with the requirements in the PVCCSP related to building materials would ensure that glare does not create a nuisance to on- and offsite viewers of the Project site. The Project would not create a new source of substantial glare. This impact would be less than significant and no mitigation is required.

ADDITIONAL MITIGATION MEASURES

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

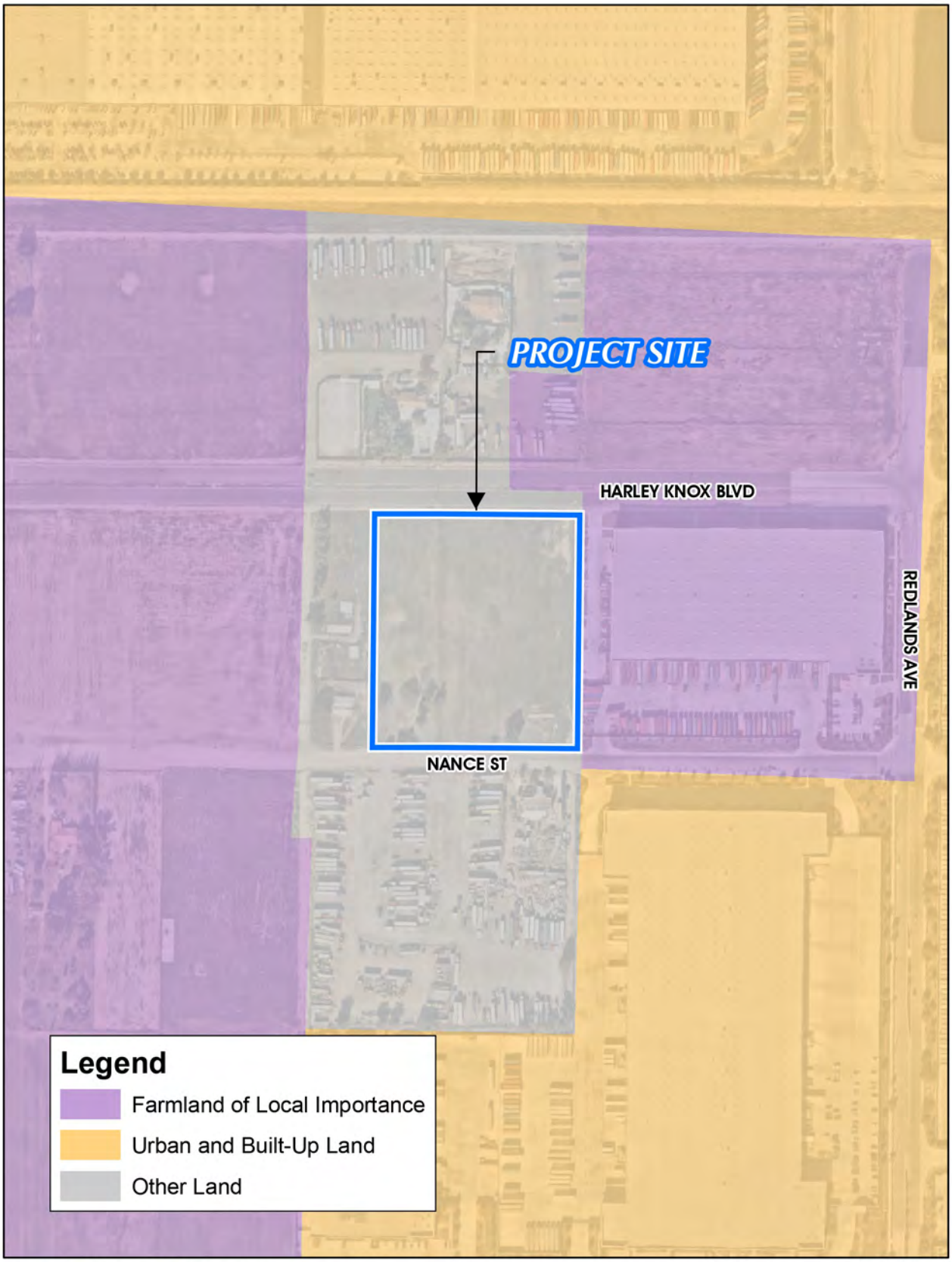
2. AGRICULTURE AND FORESTRY RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

2a. **No Impact.** The California Department of Conservation (DOC) Office of Land Conservation publishes a Farmland Conversion Report every two years as part of its Farmland Mapping and Monitoring Program (FFMP); these reports document land use conversion by acreage for the majority of the counties in California. The most recent FMMP data available for Riverside County is for the 2016-2018 period. As shown on Exhibit 22, the Project site includes land designated as Other Land (DOC, 2018). Other Land is not among the three FMMP categories considered “Farmland” or “agricultural land” under CEQA (i.e., Prime Farmland, Unique Farmland, Farmland of Statewide Importance pursuant to Section 21060.1 of the CEQA Statute). As such, the Project would not result in direct conversion of Farmland as designated by the FMMP to non-agricultural use. The designations of surrounding lands and potential for indirect conversion of agricultural land are discussed under Threshold 2e below. No impacts related to this issue would occur with implementation of the Project, and no mitigation is required.



Source(s): Dept. of Conservation (2018), Esri, Nearmap Imagery (2021), RCTLMA (2021)

Exhibit 22

0 87.5 175 350
Feet

Farmland Map

2b. **No Impact.** As identified in the City's General Plan, no agricultural zones are identified by the City for the Project site or any of the surrounding properties. With the adoption of the PVCCSP and certification of the PVCCSP EIR, the Project site's underlying zoning designation became "Specific Plan" with an underlying Specific Plan land use designation of "Light Industrial." Land use designations envisioned under the PVCCSP do not include any agricultural land uses. Because the Project site is not zoned for agricultural uses, implementation of the Project would not conflict with existing zoning for agricultural uses. Also, according to the PVCCSP EIR, only parcels located within the Perris Valley Agricultural Preserve No. 1 of the PVCCSP contain an active Williamson Act Contract. Based on PVCCSP EIR Figure 4.1-2, Agricultural Preserves, the Project site is not located within the Perris Valley Agricultural Preserve No.1 and is therefore not covered under a Williamson Act Contract (Perris, 2005b). Therefore, implementation of the Project would not conflict with any Williamson Act Contract. No impacts related to this issue would occur with implementation of the Project, and no mitigation is required.

2c-2d. **No Impact.** The City of Perris does not have any existing forest lands or zoning for forest lands or timberland (City of Perris, 2012a, Figure 2.0-1). Therefore, the Project would not conflict with existing forest zoning, cause rezoning of forest land, or result in the loss or conversion of forest lands to non-forest uses, as no such resources exist in the City. No impacts associated with this issue would occur, and no mitigation is required.

2e. **No Impact.** As discussed under Thresholds 2c-2d, no forest lands or timberland resources exist in the City. Therefore, the Project would not indirectly result in the conversion of forest land. As discussed under Threshold 2a above, the FMMP map indicates the site is composed of Other Land (DOC, 2018). The approximately 6.4-acre Project site and site-adjacent areas that would be subject to roadway and streetscape improvements are not being used for agricultural uses. As shown on Exhibit 22, surrounding parcels are designated as Farmland of Local Importance, Other Land, or as Urban and Built-Up Land. The nearest Farmland parcel, as defined under CEQA, is Prime Farmland, located approximately 0.8-mile northwest of the Project site (DOC, 2018). All areas surrounding the Project site is within the PVCCSP area in the City of Perris. Goal I-Agricultural Resources in the City's General Plan calls for the "orderly conversion of agricultural lands to other approved land uses." The Project is a logical extension of the existing development in the area and has been planned by the City for a number of years. The City has been planning for the orderly conversion of all agricultural lands within City boundaries since 1991, when the City deleted, due to economic realities, agricultural uses as a permitted use within City boundaries. In addition, none of the lands adjacent to the Project site are designated for agricultural use in the City's General Plan or Zoning Map. The PVCCSP EIR and the City's 2005 General Plan EIR determined that the conversion of agricultural land within the City would result in less than significant impacts due to the elimination of all agricultural land use designations in the 1991 General Plan and by designating all lands within the City for a future urban non-agricultural use during the City's 2005 update to the General Plan. Future conversion of parcels in the PVCCSP area, including the Project site, from agricultural uses and/or designated Farmland would be consistent with the objectives of the Specific Plan and the impacts captured in the PVCCSP EIR and the City's General Plan EIR. For this reason, in addition to the lack of designated Farmland in the Project vicinity, implementation of the Project would not involve other changes in the existing environment that could result in conversion of

Farmland to non-agricultural use. The Project would not indirectly result in the conversion of Farmland. No impacts related to this issue would occur, and no mitigation is required.

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

No PVCCSP Standards and Guidelines are specifically relevant to this air quality analysis.

PVCCSP EIR mitigation measures MM Air 1 and MM Air 10 in the PVCCSP EIR presented below require the preparation of Project-specific air quality analyses to determine whether projects implementing the PVCCSP would result in construction-related or operational air quality impacts. PVCCSP EIR mitigation measure MM Air 15 requires facility-specific health risk assessments to be prepared for projects that generate a minimum 100 truck trips per day or have more than 10 dock doors for a single building. These required analyses have been conducted in the following technical reports, and are provided in Appendix A and Appendix B, respectively, of this Initial Study: Harley Knox Commerce Center Air Quality Impact Analysis (Air Quality Impact Analysis) and Harley Knox Commerce Center Mobile Source Health Risk Assessment (HRA). In addition, PVCCSP EIR mitigation measure MM Air 18 requires project developers to contact the Riverside Transit Agency (RTA) prior to project approval to determine if the RTA has plans for the future provision of bus routing within any street that is adjacent to the project site that would require bus stops at the project access points. The RTA was contacted regarding its plans for the future provision of bus routing adjacent to the Project site that could require bus stops at the Project boundaries. The RTA indicated that it currently has no plans to implement bus routes on the streets surrounding the Project site (RTA, 2021). Therefore, the Project has complied with PVCCSP EIR mitigation measure MM Air 18.

PVCCSP MM Air 1 *To identify potential implementing development project-specific impacts resulting from construction activities, proposed development projects that are subject to CEQA shall have construction-related air quality impacts analyzed using the latest available URBEMIS model, or other analytical method determined in conjunction with the SCAQMD. The results of the construction-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's*

Localized Significance Threshold analysis or other appropriate analyses as determined in conjunction with SCAQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.

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

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

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

The PVCCSP EIR includes additional mitigation measures that are relevant to air quality. These mitigation measures, listed below, are incorporated as part of the Project and are assumed in the analysis presented in this section.

PVCCSP MM Air 2 *Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control*

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

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

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

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

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

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

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

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

PVCCSP MM Air 9 *To reduce VOC emissions associated with architectural coating, the project designer and contractor shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g., bathroom stall dividers, metal awnings), materials that do not require painting, and require coatings and solvents with a VOC content lower than required under Rule 1113 to be utilized. The construction contractor shall be required to utilize "Super-Compliant" VOC paints, which are defined in SCAQMD's Rule 1113. Construction specifications shall be included in building specifications that assure these requirements are implemented. The specifications for each implementing development project shall be reviewed by the City of Perris' Building Division for compliance with this mitigation measure prior to issuance of a building permit for that project.*

PVCCSP MM Air 11 *Signage shall be posted at loading docks and all entrances to loading areas prohibiting all onsite truck idling in excess of five minutes.*

PVCCSP MM Air 13 *In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD's Carl Moyer Program, or other State programs that restrict operations to "clean" trucks, such as 2007 or newer model year or 2010 compliant vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year would be used at a facility with three or more dock-high doors, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP [On-road Heavy Duty Voucher*

Incentive Program], HVIP [Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project], and SOON [Surplus Off-Road Opt-in for NO_X] funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants would be required to use those funds, if awarded.

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

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

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

Existing Conditions

As detailed in the Air Quality Impact Analysis included in Appendix A of this Initial Study (Urban Crossroads, 2022a), the Project site is located in the South Coast Air Basin (SCAB). The SCAB encompasses approximately 6,745 square miles and includes Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAB is bound by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, respectively; and the San Diego County line to the south. The larger South Coast district boundary includes 10,743 square miles. The Project site is currently undeveloped and does not include any uses or activities that generate a substantial amount of air quality emissions.

The Air Quality Impact Analysis included in Appendix A of this Initial Study and the PVCCSP EIR provide additional details related to the SCAB, the regulatory background, the regional climate, wind patterns, criteria pollutants and their health effects, existing air quality, and regional air quality improvement. Existing air quality is measured at established South Coast Air Quality Management District (SCAQMD) air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. Criteria pollutants, discussed in detail in the Air Quality Impact Analysis included in Appendix A of this Initial Study, are pollutants that are regulated through the development of human health-based and/or environmentally-based criteria for setting permissible levels, or standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. The National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect for each pollutant regulated under these standards, including ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), inhalable particulate matter with a diameter of 10 microns or less (PM_{10}), fine particulate matter with a diameter of 2.5 microns or less ($PM_{2.5}$), and lead (Pb), are shown in Table 2-1 of the Air Quality Impact Analysis included in Appendix A. The determination of whether a region's air quality is healthful or

unhealthful is determined by comparing contaminant levels in ambient air samples to the California (State) and federal standards.

The SCAQMD monitors levels of various criteria pollutants at 37 permanent monitoring stations and five single-pollutant source lead air monitoring sites throughout the air district. Table 3-1 identifies the current attainment designations for the SCAB.

TABLE 3-1 ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SOUTH COAST AIR BASIN

Criteria Pollutant	State Designation	Federal Designation
Ozone - 1 hour standard	Nonattainment	--
Ozone - 8 hour standard	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment
$PM_{2.5}$	Nonattainment	Nonattainment
Carbon Monoxide	Attainment	Unclassifiable/Attainment
Nitrogen Dioxide	Attainment	Unclassifiable/Attainment
Sulfur Dioxide	Unclassifiable/Attainment	Unclassifiable/Attainment
Lead	Attainment	Unclassifiable/Attainment

Source: (Urban Crossroads, 2022a, Table 2-3)

Relative to the Project site, the nearest long-term air quality monitoring site for O_3 and PM_{10} is the SCAQMD Perris monitoring station (Source Receptor Area [SRA] 24), located approximately 4.4 miles south of the Project site. Data for CO and NO_2 was obtained from the Elsinore Valley monitoring station (SRA 25), located approximately 13.5 miles southwest of the Project site. Data for $PM_{2.5}$ was obtained from the Metropolitan Riverside County 1 monitoring station (SRA 23), located approximately 14.9 miles northwest of the Project site. The Elsinore Valley monitoring station and Metropolitan Riverside County 1 monitoring station were utilized in lieu of the Perris monitoring station only where data was not available from the nearest monitoring site. The most recent three years of data available is shown on Table 2-4 of the Air Quality Impact Analysis included in Appendix A and identifies the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality at the Project site. Additionally, data for SO_2 has been omitted as attainment is regularly met in the SCAB and few monitoring stations measure SO_2 concentrations.

As discussed previously in Section 2.1, Project Site Location and Setting, of this Initial Study, the Project site is currently vacant; there are currently no air quality emissions generated from the Project site. Existing air quality conditions at the Project site would generally reflect ambient monitored conditions, as discussed above.

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as “sensitive receptors;” they are also known to be locations where an individual can remain for 24 hours. Additionally, localized air quality impacts were evaluated at the nearest industrial uses to the Project site to account for workers that may be present at these sites. The SCAQMD recommends that the nearest sensitive receptor be considered when determining a Project’s potential to cause an individual and cumulatively significant impact. Representative sensitive receptors near the Project site include single-family residences (a non-conforming use in the Light Industrial zone) and existing light industrial use as described below and shown on Exhibit 23. Even though the existing non-conforming residences likely will ultimately

Source(s): Urban Crossroads (07-06-2021)

Exhibit 23

Not to Scale

Receptor Locations

be developed with land uses that are consistent with the underlying Light Industrial land use designation (the property to the west has been purchased by an industrial developer), for purposes of a conservative analysis they are considered sensitive receptors until such time they no longer exist. As further described below, the industrial use is considered a sensitive receptor with respect to localized impacts of NOx and CO.

- **R1** – Located approximately 133 feet north of the Project site and north of Harley Knox Boulevard, R1 represents an existing non-conforming residential use.

- **R2** – Located approximately 20 feet south of the Project site and south of Nance Street, R2 represents an existing non-conforming residential use.

- **R3** – Located approximately 10 feet west of the Project site, R3 represents an existing non-conforming residential use.

- **R4** – Located approximately 673 feet southwest of the Project site, R4 represents an existing non-conforming residential use.

- **R5** – Located approximately 10 feet east of the Project site, R5 represents an existing industrial land use.

EXPLANATION OF CHECKLIST ANSWERS

This section summarizes the Air Quality Impact Analysis and HRA prepared by Urban Crossroads (Urban Crossroads, 2022a; Urban Crossroads, 2022b), which are provided in Appendix A and Appendix B, respectively, of this Initial Study.[3]

3a. **Less Than Significant Impact.** As identified above, within the SCAB, the SCAQMD is principally responsible for air pollution control. The SCAQMD works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as State and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet State and federal ambient air quality standards. Currently, these State and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of air quality management plans (AQMPs) to meet the State and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

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

[3] At the time the Air Quality Impact Analysis and HRA were prepared, the Project was proposed to consist of a 156,780-sf building compared to the currently proposed 156,094-sf of building (a difference of 686 sf). Therefore, the analysis is conservative as it is based development of a slightly larger building.

categories. The Project's consistency with the AQMP has been determined using the *2016 AQMP*.

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

The City of Perris General Plan land use and Zoning designation for the Project site is PVCCSP and the PVCCSP designation is "Light Industrial." The Project consists of a single warehouse building of approximately 156,094 sf, which is consistent with the site's General Plan land use and Zoning designations. Therefore, this land use development and associated air quality emissions would have been accounted for in the SCAQMD's *2016 AQMP*.

Population and employment estimates for the City are compiled by the SCAG in the *RTP/SCS*. The Project would increase employment opportunities within the City. The employment projections in the *RTP/SCS* are based on information gathered from cities within SCAG's jurisdiction. Hence, because the Project is consistent with the land use designation in the PVCCSP and the Perris General Plan, employment estimates associated with implementation of the Project would have also been accounted for in the *RTP/SCS*. Therefore, because the Project is compliant with local and use plans and population projections, the Project would not conflict with or obstruct implementation of the *AQMP*. The potential impact of the Project will be less than significant.

3b. **Less than Significant with Mitigation Incorporated.** The SCAQMD has developed regional and localized significance thresholds (LSTs) for regulated pollutants, as summarized in Table 3-2. The SCAQMD's CEQA Air Quality Significance Thresholds indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

TABLE 3-2 MAXIMUM DAILY EMISSIONS THRESHOLDS

Pollutant	Construction	Operations
Regional Thresholds[1]		
NO_X	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Localized Thresholds[2]		
NO_X	270 lbs/day	270 lbs/day
CO	1,577 lbs/day	1,577 lbs/day
PM_{10}	13 lbs/day	4 lbs/day
$PM_{2.5}$	8 lbs/day	2 lbs/day

[1] Based on SCAQMD CEQA Air Quality Significance Thresholds, April 2019

[2] Based on SCAQMD Final Localized Significance Threshold Methodology, July 2008
Source: (Urban Crossroads, 2022a, Table 3-1, Table 3-9, and Table 3-11)

Land uses such as the Project affect air quality through construction-source and operational-source emissions. In May 2021, the SCAQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the California Emissions Estimator Model (CalEEMod) v2020.4.0. The purpose of this model is to calculate construction-source and operational-source criteria pollutants (NO_X, VOC, PM_{10}, $PM_{2.5}$, SO_X, and CO) and greenhouse gas (GHG) emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for the Project to determine construction and operational air quality emissions.[4] Output from the model runs for both construction and operational activity are provided in the Air Quality Impact Analysis included in Appendix A of this Initial Study (Urban Crossroads, 2022a).

Regional Construction Impacts

Construction activities associated with the Project would result in emissions of CO, VOC, NO_X, SO_X, PM_{10}, and $PM_{2.5}$. Construction-related emissions are expected from the following construction activities: site preparation, grading, building construction, storm drain construction, paving, and architectural coating.

For analysis purposes in this Initial Study air quality analysis, it is estimated that construction would occur in one phase and last for approximately 13 months. The construction schedule utilized in the analysis is shown in Table 3-3 in Appendix A, is conservative and anticipates construction starting in October 2021 and ending in November 2022. Since construction would occur after these respective dates, emission factors for construction would decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. A summary of estimated construction equipment is provided in Table 2-1 of this Initial Study. The site-specific construction fleet may vary due to specific Project needs at the time of construction. The duration of construction activity and associated equipment both represent a reasonable approximation of the expected construction fleet. Specific modeling assumptions and detailed modeling inputs/outputs are provided in the Air Quality Impact Analysis included in Appendix A (Urban Crossroads, 2022a).

The estimated maximum daily construction emissions are summarized in Table 3-3. The Project is required to comply with the applicable PVCCSP EIR mitigation measures listed previously; and implementation of mitigation measures MM Air 3, MM Air 6 and MM Air 9 are included in the modeling. As shown, Project construction-source emissions would not exceed the numerical thresholds of significance established by the SCAQMD for any criteria pollutant. Accordingly, the Project would not emit substantial concentrations of these pollutants during construction and would not contribute to an existing or projected air quality violation, on a direct or cumulatively-considerable basis. Thus, a less than significant impact would occur for Project-related construction-source emissions and no additional mitigation is required.

[4] PVCCSP EIR mitigation measures MM Air 1 and MM Air 10 require the use of the latest available URBEMIS model to estimate the construction-related and operational emissions of projects proposed within the PVCCSP planning area. Since the time that the PVCCSP EIR was certified by the City of Perris, the URBEMIS model has been replaced by CalEEMod. CalEEMod is now recommended by the SCAQMD for all general development projects within the SCAB.

TABLE 3-3 MAXIMUM DAILY PEAK CONSTRUCTION EMISSIONS (WITH NO MITIGATION EXCEPT FOR PVCCSP EIR MITIGATION)

Year	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
2021	5.42	60.86	23.92	0.06	11.97	6.59
2022	65.18	51.54	43.97	0.11	5.51	3.06
Winter						
2021	5.41	60.87	22.96	0.06	11.97	6.59
2022	65.17	51.75	42.24	0.11	5.51	3.06
Maximum Daily Emissions	**65.18**	**60.87**	**43.97**	**0.11**	**11.97**	**6.59**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2022a, Table 3-5)

Long-Term Operational Impacts

Operational activities associated with the Project would result in emissions of VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. Operational emissions would be expected from the following primary sources: area source emissions, energy source emissions, mobile source emissions, and onsite cargo handling equipment emissions, which are described in Section 3.5 of the Air Quality Impact Analysis included in Appendix A of this Initial Study.

Operational-source emissions are summarized in Table 3-4. It should be noted that the Project is required to comply with the applicable PVCCSP EIR mitigation measures as identified previously; however, to provide a conservative analysis, no credit was taken for any of the PVCCSP EIR operational mitigation measures. As shown, the Project would not exceed the applicable regional thresholds of significance established by the SCAQMD for emissions of any criteria pollutant. Accordingly, the Project would not emit substantial concentrations of these pollutants during long-term operation and would not contribute to an existing or projected air quality violation, on a direct or cumulatively-considerable basis. Impacts associated with long-term emissions from the Project would be less than significant and additional mitigation is not required.

The City of Perris is located in the SCAB, which is designated as an extreme non-attainment area for ozone, and a non-attainment area for PM_{10}, $PM_{2.5}$, and also lead in portions of Los Angeles County. This evaluation of Project-specific air pollutant emissions demonstrates that the Project would not exceed any applicable thresholds that are designed to assist the region in attaining the applicable State and national ambient air quality standards, with adherence to mandatory regulatory requirements and SCAQMD Rules as outlined in the applicable PVCCSP EIR mitigation measures identified previously. Compliance with these measures, which are imposed on all development projects in the SCAB, would minimize emissions of ozone precursors, PM_{10}, and $PM_{2.5}$.

TABLE 3-4 MAXIMUM OPERATIONAL EMISSIONS (WITH NO MITIGATION EXCEPT FOR PVCCSP EIR MITIGATION)

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Area Source	3.55	4.20E-04	0.05	0.00	1.60E-04	1.60E-04
Energy Source	0.00	0.00	0.00	0.00	0.00	0.00
Mobile Source	1.17	19.14	11.52	0.11	5.28	1.65
On-Site Equipment Source	0.12	1.27	0.76	3.17E-03	0.04	0.04
Total Maximum Daily Emissions	**4.84**	**20.41**	**12.33**	**0.11**	**5.32**	**1.69**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Area Source	3.55	4.20E-04	0.05	0.00	1.60E-04	1.60E-04
Energy Source	0.00	0.00	0.00	0.00	0.00	0.00
Mobile Source	1.07	20.15	10.55	0.11	5.28	1.65
On-Site Equipment Source	0.12	1.27	0.76	3.17E-03	0.04	0.04
Total Maximum Daily Emissions	**4.74**	**21.42**	**11.35**	**0.11**	**5.32**	**1.69**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2022a, Table 3-8)

In addition, the SCAQMD recently adopted Rule 2305, the Warehouse Indirect Source Rule. This rule requires warehouse buildings greater than 100,000 square feet to directly reduce NOx and PM emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities. The SCAQMD estimates that Rule 2305 will reduce warehouse-related emissions by 10 to 15 percent basin-wide. The proposed Project would be subject to this rule.

The SCAQMD considers all individual project air pollutant emissions that exceed the SCAQMD regional thresholds to also be cumulatively-considerable. Conversely, if a project does not exceed the SCAQMD regional thresholds, then SCAQMD considers that a project's air pollutant emissions to be less than cumulatively-considerable. As described above under Threshold 3b, the Project would not exceed SCAQMD regional thresholds for any criteria pollutant during construction or operation, including air pollutants for which the region is in non-attainment of applicable federal and State standards. Therefore, the Project's air pollutant emissions during construction and operation would be less than cumulatively-considerable. No additional mitigation is required.

Health Consequences

In December 2018, in the case of Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, the California Supreme Court held that an Environmental Impact Report's (EIR) air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. As discussed in briefs filed in the Friant Ranch case, correlating a project's criteria air pollutant emissions to specific health impacts is challenging. Health effects caused by criteria pollutant emissions are dependent on a variety of interrelated variables. In particular, ozone precursors (VOCs and NOX) affect air quality on a regional scale. The SCAQMD, which has among the most sophisticated air quality modeling and health impact evaluation capability of any of the

air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes noted that it may be difficult to quantify health impacts for criteria pollutants. The Brief is included in the Air Quality Impact Analysis included in Appendix A of this Initial Study.

As noted in the Brief, the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) ties the difficulty of correlating the emission of criteria pollutants to health impacts to how ozone and particulate matter are formed, stating that "[b]ecause of the complexity of ozone formation, a specific tonnage amount of NO_X or VOCs emitted in a particular area does not equate to a particular concentration of ozone in that area." Similarly, the tonnage of PM "emitted does not always equate to the local PM concentration because it can be transported long distances by wind," and "[s]econdary PM, like ozone, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as sulfur dioxides (SO_X) and NO_X," meaning that "the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area." The disconnect between the amount of precursor pollutants and the concentration of ozone or PM formed makes it difficult to determine potential health impacts, which are related to the concentration of ozone and PM experienced by the receptor rather than levels of NO_X, SO_X, and VOCs produced by a source.

Health effects related to ozone are therefore the product of emissions generated by numerous sources throughout a region. SCAQMD's Brief goes on to state that "it takes a large amount of additional precursor emissions (NO_X and VOCs) to cause a modeled increase in ambient ozone levels over an entire region," The SCAQMD states that based on their own modeling in the SCAQMD's 2012 AQMP, a reduction of "NO_X by 432 tons per day (157,680 tons/year) and reducing VOC by 187 tons per day (68,255 tons/year) would reduce ozone levels at the SCAQMD's monitor site with the highest levels by only 9 parts per billion.". As such, the SCAQMD concludes that it is not currently possible "to accurately quantify ozone-related health impacts caused by NO_X or VOC emissions from relatively small projects."

Most local agencies, including the City of Perris, lack the data to do their own assessment of potential health impacts from criteria air pollutant emissions, as would be required to establish customized, locally-specific thresholds of significance based on potential health impacts from an individual development project. The use of national or "generic" data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in cause asthma), existing scientific tools cannot accurately estimate health impacts of the Project's air emissions without undue speculation. Instead, readers are directed to the Project's Air Quality Impact Analysis, which provides extensive information concerning the quantifiable and non-quantifiable health risks related to the Project's construction and long-term operation.

Notwithstanding, the Project's localized impact to air quality for emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$ have been evaluated by comparing the Project's onsite emissions to the SCAQMD's applicable LST thresholds. The LST analysis above determined that the project would not result in emissions exceeding SCAQMD's LSTs. Therefore, the

Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$.

As the Project's emissions would comply with federal, state, and local air quality standards, the Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level and would not provide a reliable indicator of health effects if modeled.

3c. **Less than Significant Impact.** As identified previously, there are sensitive receptors in proximity to the Project site. This section discusses criteria pollutants from onsite construction and operation, CO hotspots, and toxic air contaminants.

Localized Impacts from Criteria Pollutants

The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or State ambient air quality standards (NAAQS/CAAQS), referred to as LSTs. The SCAQMD adopted LSTs that show whether a Project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. The methodology for conducting the LST analysis is outlined in Section 3.6 of the Air Quality Impact Analysis included in Appendix A of this Initial Study.

As previously identified, the nearest sensitive residential receptor is a non-conforming residence approximately 10 feet west of the Project site. As such, a 10-foot receptor distance is used for PM_{10} and $PM_{2.5}$ since these emissions standards are based on where an individual could remain for 24 hours. The LST Methodology explicitly states that *"*LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours.*"* Consistent with the SCAQMD's LST Methodology, the nearest industrial use to the Project site has been used to determine operational and construction air impacts for emissions of NO_2 and CO. The nearest industrial use is represented by location R5 where an existing industrial use is located roughly 10 feet east of the Project site boundary. As such, a 10-foot receptor distance is utilized as a screening threshold to determine LSTs for emissions of NO_2 and CO.

Localized Construction Impacts

For the Project, the appropriate SRA for the LST analysis is the Perris Valley monitoring station (SRA 24). LSTs apply to CO, NO_2, PM_{10}, and $PM_{2.5}$. The SCAQMD produced look-up tables for projects less than or equal to 5 acres in size. However, as described in Section 3.6 of the Air Quality Impact Analysis included in Appendix A of this Initial Study, the maximum daily disturbed acreage for the Project would be 16.0 acres per day. Although the total acreage disturbed is more than 5.0 acres per day for construction activities, the 5.0-acre LST Methodology look-up tables can be used as a screening tool to determine which pollutants require additional detailed analysis. This approach is conservative as it assumes that all onsite emissions associated with the Project would occur within a concentrated 5-acre area. This screening method would therefore over-predict potential localized impacts, because by assuming that onsite construction activities are occurring over a smaller area, the resulting concentrations of air pollutants are more highly concentrated once they reach the smaller site boundary than they would be for activities if they were spread out over a larger surface area.

Table 3-5 identifies the localized impacts at the nearest receptor location in the vicinity of the Project. Outputs from the model runs for construction LSTs are provided in Appendix A. As shown, Project construction-source emissions would not exceed the numerical LSTs established by the SCAQMD for any criteria pollutant, and this impact would be less than significant. The Project is required to comply with the applicable construction-related PVCCSP EIR mitigation measures identified previously. No additional mitigation is required.

It should also be noted that none of the receptors in the vicinity of the offsite construction activity would be subject to greater impacts than described above for onsite construction activities since the disturbance area and consequently associated construction emissions would be substantially less than what has been identified.

TABLE 3-5 LOCALIZED CONSTRUCTION EMISSIONS (WITH NO MITIGATION EXCEPT FOR PVCCSP EIR MITIGATION)

On-Site Emissions	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Site Preparation				
Maximum Daily Emissions	**60.71**	**21.83**	**11.76**	**6.53**
SCAQMD Localized Threshold	270	1,577	13	8
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Grading				
Maximum Daily Emissions	**39.90**	**16.36**	**6.03**	**2.99**
SCAQMD Localized Threshold	270	1,577	13	8
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Building Construction				
Maximum Daily Emissions	**33.97**	**18.20**	**1.48**	**1.38**
SCAQMD Localized Threshold	270	1,577	13	8
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Storm Drain Construction				
Maximum Daily Emissions	**17.75**	**15.71**	**1.02**	**0.96**
SCAQMD Localized Threshold	270	1,577	13	8
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2022a, Table 3-10)

Localized Operational Impacts

As noted previously, the LST methodology provides look-up tables for sites with an area with daily disturbance of 5 acres or less. For projects that exceed 5 acres, such as the Project site, the 5-acre LST look-up tables can be used as a screening tool to determine which pollutants require additional detailed analysis. This approach is conservative as it assumes that all onsite emissions associated with the Project would occur within a concentrated 5-acre area. This screening method would therefore over-predict potential localized impacts, because by assuming that onsite operational

activities are occurring over a smaller area, the resulting concentrations of air pollutants are more highly concentrated once they reach the smaller site boundary than they would be for activities if they were spread out over a larger surface area. On a larger site, the same amount of air pollutants generated would disperse over a larger surface area and would result in a lower concentration once emissions reach the project-site boundary. As such, LSTs for a 5-acre site during operations are used as a screening tool to determine if further detailed analysis is required.

Table 3-6 shows the calculated emissions for the Project's operational activities compared with the applicable LSTs. The LST analysis generally includes onsite sources described previously; however, the CalEEMod outputs do not separate onsite and offsite emissions from mobile sources. In an effort to establish a maximum potential impact scenario for analytic purposes, the emissions shown in Table 3-6 represent all onsite Project-related stationary (area) sources and five percent of the Project-related mobile sources[5]. Modeling based on these assumptions demonstrates that the operational-source emissions would not exceed the SCAQMD's LST's for any criteria pollutant and a less than significant impact would occur. The Project is required to comply with the applicable PVCCSP EIR operations mitigation measures identified previously. No additional mitigation is required.

TABLE 3-6 LOCALIZED OPERATIONAL EMISSIONS (WITH NO MITIGATION EXCEPT FOR PVCCSP EIR MITIGATION)

On-Site Emissions	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**2.28**	**1.38**	**0.31**	**0.12**
SCAQMD Localized Threshold	270	1,577	4	2
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2022a, Table 3-12)

Carbon Monoxide Hotspots

An adverse CO concentration, known as a "hot spot," would occur if an exceedance of the State 1-hour standard of 20 parts per million (ppm) or the 8-hour standard of 9 ppm were to occur. CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SCAB is now designated as attainment, as previously noted in Table 3-1.

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO "hot spot" analysis was conducted for the 2003 AQMP for four busy intersections in Los Angeles at the peak morning and afternoon time periods (2003 Los Angles hot spot study). According to the 2003 hot spot analysis, the 8-hour CO concentration at the Long Beach Boulevard and Imperial Highway intersection (the

[5] Considering that the trip length used in CalEEMod for the Project is approximately 16.6 for passenger cars and 40.0 miles for trucks, 5 percent of this total would represent an onsite travel distance of approximately 0.8 mile for passenger cars and 2.0 miles for trucks.

highest CO-generating intersection within the hotspot analysis), was measured at 9.3 ppm; however, only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection, the remaining 8.6 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared.

The ambient 1-hr and 8-hr CO concentration within the Project study area is estimated to be 0.9 ppm and 0.07 ppm, respectively (data from Elsinore Valley monitoring station for 2020). Therefore, even if the traffic volumes for the Project were double or even triple of the traffic volumes generated at the Long Beach Boulevard and Imperial Highway intersection, coupled with the on-going improvements in ambient air quality, the Project would not be capable of resulting in a CO "hot spot" at any study area intersections.

Similar considerations are also employed by other air districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact. The busiest intersection evaluated in the 2003 Los Angeles hot spot study was Wilshire Boulevard and Veteran Avenue, with a daily traffic volume of approximately 100,000 vehicles per day and AM/PM traffic volumes of 8,062 vehicles per hour and 7,719 vehicles per hour respectively. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm. This indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (estimated at 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm). At buildout of the Project, the Project is anticipated to generate a total of 272 trip-ends per day, which is lower than the highest daily traffic volumes generated at the busiest intersection in the CO "hot spot" analysis. As such, Project-related traffic volumes are less than the traffic volumes identified in the 2003 AQMP.

The Project, with approximately 272 trip-ends per day, would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study, or based on representative BAAQMD CO threshold considerations. Therefore, CO "hot spots" are not an environmental impact of concern for the Project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant and no mitigation is required.

Toxic Air Contaminants

A mobile source HRA was completed for the Project to evaluate the potential mobile source health risk impacts to sensitive receptors (residents) and adjacent workers associated with the development of the Project (Urban Crossroads, 2022b). More specifically, the HRA addresses health risk impacts as a result of exposure to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks accessing the site. The HRA is included in its entirety in Appendix B of this Initial Study, and is summarized below.

The HRA was conducted in accordance with the guidelines in the SCAQMD Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis and is comprised of all relevant and appropriate procedures presented by the U.S. Environmental Protection Agency (USEPA), California Environmental Protection Agency (CalEPA), and SCAQMD. The HRA used the USEPA atmospheric dispersion modeling system (AERMOD).

Cancer risk is expressed in terms of expected incremental incidence per million population. The SCAQMD has established an incidence rate of 10 persons per million as the maximum acceptable incremental cancer risk due to DPM exposure. This threshold serves to determine whether or not a given project has a potentially significant development-specific and cumulatively considerable impact. The SCAQMD has also established non-carcinogenic risk parameters for use in HRAs. Non-carcinogenic risks are quantified by calculating a "hazard index," expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). An REL is a concentration at or below which health effects are not likely to occur. A hazard index of less than 1.0 means that adverse health effects are not expected. Within this analysis, non-carcinogenic exposures of less than 1.0 are considered less than significant.

Vehicle DPM emissions were estimated using emission factors for particulate matter less than 10µm in diameter (PM_{10}) generated with the 2017 version of the EMission FACtor model (EMFAC) developed by the CARB. EMFAC2017 incorporates regional motor vehicle data, information and estimates regarding the distribution of vehicle miles traveled (VMT) by speed, and number of starts per day. Additional information about the methods for conducting the HRA are provided in the Project-specific HRA included in Appendix B of the Initial Study.

Trucks operate in two modes: stationary idling and moving on and off the site. The modeled emission sources for the Project are shown on Exhibit 24 and included onsite truck idling and onsite and offsite truck travel. The emissions derived in the HRA assume that every truck accessing the Project site will idle for 15 minutes, this is an overestimation of actual idling times and thus conservative.[6] Truck traffic volumes and truck routes were estimated based on the Harley Knox Commerce Center Trip Generation Assessment, which can be found in Appendix M of this Initial Study. Additional details of HRA methods are included in the HRA in Appendix B of this Initial Study.

Potential Project-Related Diesel Particulate Matter Source Cancer and Non-Cancer Risks

- **Individual Exposure Scenario.** The residential land use with the greatest potential exposure to Project-related DPM source emissions is receptor R3 located approximately 10 feet west of the Project site existing non-conforming residence). At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project DPM source emissions is estimated at 3.86 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be less than 0.01 in one million, which would not exceed the applicable threshold of 1.0 in one million. As such, the Project will not cause a significant human health or cancer risk to adjacent residences. Because all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance from the Project site and primary truck route than the MEIR analyzed herein, and TACs generally dissipates with distance from the source, all other residential receptors in the vicinity of the Project site and along the anticipated truck travel route would

[6] Although the Project is required to comply with CARB's idling limit of 5 minutes, staff at SCAQMD recommends that the onsite idling emissions should be estimated for 15 minutes of truck idling, which would take into account onsite idling which occurs while the trucks are waiting to pull up to the truck bays, idling at the bays, idling at check-in and check-out, etc.

Source(s): Urban Crossroads (07-06-2021)

Exhibit 24

Not to Scale

Modeled Emission Sources

be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project would not cause a significant human health or cancer risk to nearby residences. The nearest modeled receptors are also illustrated on Exhibit 24.

- **Worker Exposure Scenario**. The worker receptor land use with the greatest potential exposure to Project-related DPM source emissions is R5, located approximately 10 feet east of the Project site (industrial building east of the Project site). At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact at this location is 0.21 in one million which is less than the threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be less than 0.01 in one million, which would not exceed the applicable threshold of 1.0 in one million. As such, the Project would not cause a significant human health or cancer risk to adjacent workers. Because all other modeled worker receptors are located at a greater distance than the MEIW analyze herein, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project would not cause a significant human health or cancer risk to adjacent workers. The nearest modeled receptors are also illustrated on Exhibit 24.

- **School Child Exposure Scenario**. There are no schools located within a 0.25-mile of the Project site; the nearest school in the Project vicinity would be the Rancho Verde High School which is located over 3,800 feet (0.7 mile) northeast of the Project site. As further discussed in Section 2.6 of the HRA included in Appendix B of this Initial Study, a one-quarter mile radius or 1,320 feet geographic scope is utilized for determining potential impacts to nearby schools. This radius is more robust than, and therefore provides a more health protective scenario for evaluation than the 1,000-foot impact radius identified in the HRA. Since there is no school site located within 0.25-mile of the Project site, there would be no significant impact that would occur to the nearest school, or any other schools located more than 0.25 mile from the Project site.

3d. **Less Than Significant Impact.** Odors would be emitted during construction and operation of uses allowed under the PVCCSP, including industrial uses as proposed with the Project. The PVCCSP EIR (Section 4.2, Air Quality) concludes that, because of the short-term duration and quantity of emissions during construction and the limited outdoor exposure of persons to odors, odor impacts from construction of projects in the Specific Plan area would be less than significant.

As previously described, there are existing non-conforming residential uses located west, south, and north of the Project site, and there are industrial uses to the east and southeast. There are a not a substantial number of people that would be affected by emissions, including odor emissions, from the Project. The Project would involve standard construction activities and potential construction odors including construction equipment exhaust and the application of asphalt and architectural coatings. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phases of construction. Therefore, other emissions, including odor emissions, resulting from construction of the Project would be temporary, would not affect a substantial number of people, and would be less than significant.

Substantial odor-generating sources include land uses such as agricultural uses (livestock and farming), wastewater treatment facilities, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The Project does not propose any such uses and does not contain land uses typically associated with emitting objectionable odors. Potential sources of operational odors generated by the Project would include temporary storage of typical solid waste (refuse). Moreover, SCAQMD Rule 402 acts to prevent occurrences of public nuisances. Consistent with City requirements, all Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations. Therefore, other emissions, including odor emissions, resulting from operation of the Project would not affect a substantial number of people, and would be less than significant.

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

No PVCCSP Standard and Guidelines are applicable to the analysis of biological resources for the Project. The preparation of a Project-specific habitat assessment required by PVCCSP EIR

mitigation measures MM Bio 1 and MM Bio 2 has been completed as part of preparation of this Initial Study. The results of the habitat assessment are presented in this section. While no burrowing owls or active nests for protected nesting birds were identified at the site during the Biological Assessment, the City requires pre-activity field surveys per PVCCSP EIR mitigation measure MM Bio 1 and pre-construction surveys per PVCCSP EIR mitigation measure MM Bio 2:

PVCCSP MM Bio 1 *In order to avoid violation of the MBTA and the California Fish and Game Code, site preparation activities (removal of trees and vegetation) for all PVCC implementing development and infrastructure projects shall be avoided, to the greatest extent possible, during the nesting season (generally February 1 to August 31) of potentially occurring native and migratory bird species.*

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

PVCCSP MM Bio 2 *Project-specific habitats assessments and focused surveys for burrowing owls will be conducted for implementing development or infrastructure projects within burrowing owl survey areas. A pre-construction survey for resident burrowing owls will also be conducted by a qualified biologist within 30 days prior to commencement of grading and construction activities within those portions of implementing project sites containing suitable burrowing owl habitat and for those properties within an implementing project site where the biologist could not gain access, If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity will be conducted in accordance with the current Burrowing Owl Instruction for the Western Riverside MSHCP.*

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

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

EXPLANATION OF CHECKLIST ANSWERS

Section 4.3, Biological Resources, of the PVCCSP EIR (January 2012) includes an assessment of potential impacts to biological resources resulting from development of land uses allowed under the PVCCSP, including the Project site. Section 4.3 of the PVCCSP EIR includes a discussion of the setting (existing biological resources) and related regulations that remain applicable to the Project site and are incorporated by reference in this Initial Study. Related regulations discussed include the Federal Endangered Species Act, the Migratory Bird Treaty Act (MBTA), the Federal Clean Water Act, the California Endangered Species Act, the California Fish and Game Code, the Stephens' Kangaroo Rat Habitat Conservation Plan, the Riverside County Integrated Plan, the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP), the City of Perris Ordinance No. 1123 (local development mitigation fee), and the City of Perris General Plan Conservation Element. The discussion of related regulations for the PVCCSP EIR is incorporated by reference.

In addition to the PVCCSP EIR, the information presented in this section is based on three reports: 1) Western Riverside County Multiple Species Habitat Conservation Plan (MSCHP) Consistency Analysis for the Harley Knox Commerce Center Project Site, City of Perris, Western Riverside County, California (MSHCP Consistency Analysis) prepared by Cadre Environmental (June 21, 2021) (Cadre, 2021a); 2) Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Sensitive Plant Surveys for the 6.43-Acre (1.22-Acre Offsite Impact Area) Harley Knox Commerce Center Project Site, City of Perris, Western Riverside County, California (Sensitive Plant Survey Report) prepared by Cadre Environmental (June 21, 2021) (Cadre, 2021b); and 3) Harley Knox Tree Inventory and Evaluation (Tree Inventory) prepared by Earthwise Arborists (June 29, 2021) (Earthwise, 2021). These reports are included in Appendix C1, Appendix C2, and Appendix C3, respectively, of this Initial Study, and are summarized below. The study area for these reports, and as referenced in this section, includes the Project site and offsite improvement areas.

The survey area is within the Mead Valley Area Plan of the Western Riverside County MSHCP. As identified in Section 4.3, Biological Resources, of the PVCCSP EIR, the MSHCP serves as a comprehensive multi-jurisdictional Habitat Conservation Plan (HCP), pursuant to Section (a)(1)(B) of the Federal Endangered Species Act of 1973 as well as a Natural Communities Conservation Plan (NCCP) under the State NCCP Act of 2001. The MSHCP includes a program for the collection of development mitigation fees; policies for the review of projects in areas where habitat must be conserved; and policies for the protection of riparian area, vernal pools, and narrow endemic plants. It also includes a program for performing plant, bird, reptile, and mammal surveys.

Based on the Regional Conservation Authority (RCA) MSHCP Information Map query and review of the MSHCP, the Project site and associated offsite improvement areas are not located within any designated MSHCP "Criteria Area" cells, Cell Group corridors, or linkages. The entire Project site is located within a designated survey area for the burrowing owl criteria area and narrow endemic plant species. The Project's relationship to the MSHCP is presented on Exhibit 25. The Project-specific studies were conducted in compliance with the MSHCP, as further described in the respective studies included in Appendix C1 and Appendix C2 of this Initial Study, and are summarized herein.

As detailed in the MSHCP Consistency Analysis included in Appendix C1 of this Initial Study, prior to the field survey, a review of all available and relevant data on the biological characteristics, sensitive habitats, and species potentially present on or adjacent to the Project site was conducted by Cadre. Additionally, aerial photography, and USGS topographic map were examined. After reviewing the available information, Cadre conducted a physical site assessment. All portions of the Project Site were surveyed on-foot on February 11, 2021 by walking slowly and methodically across each habitat type.

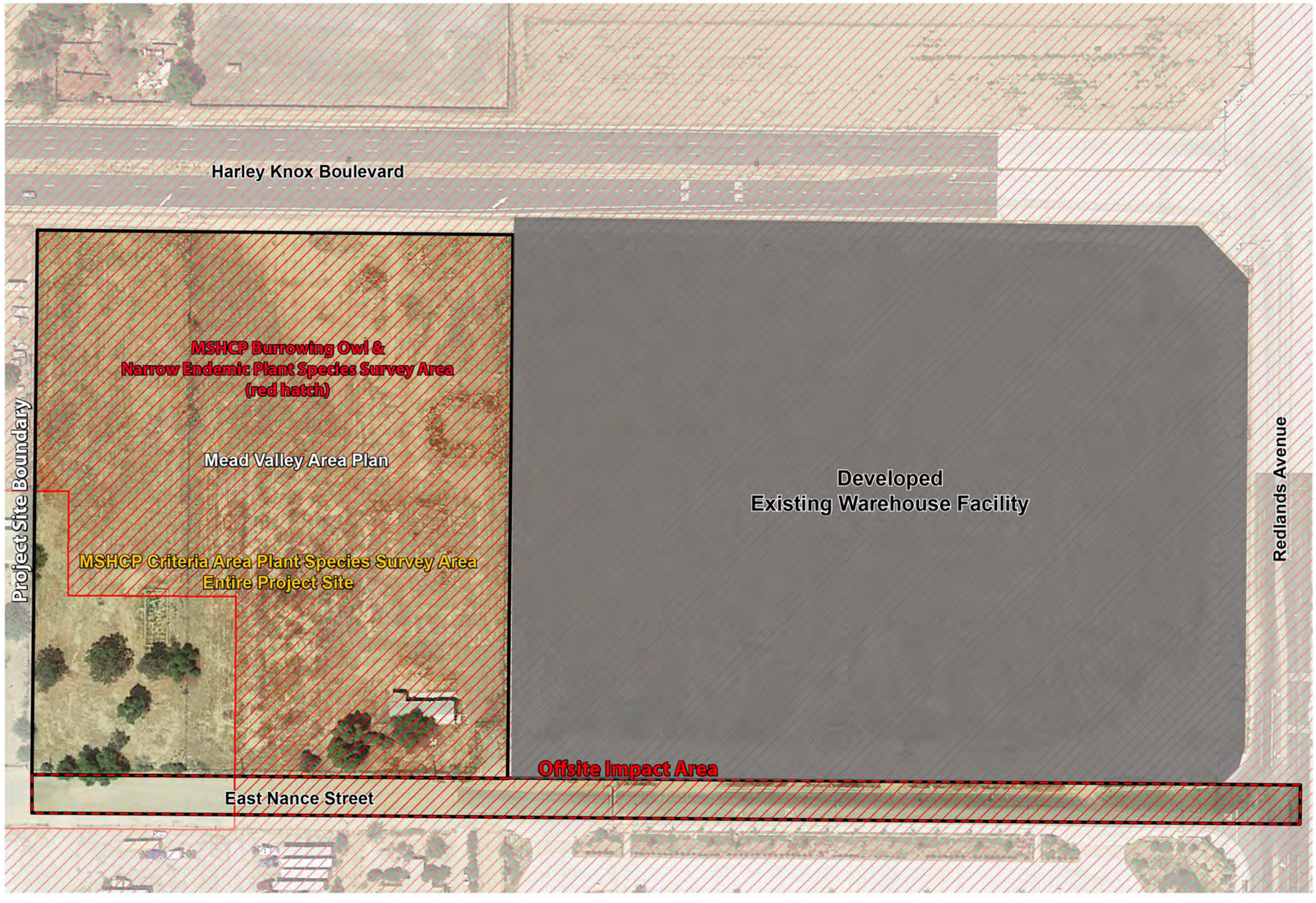
4a. Less Than Significant Impact with Mitigation Incorporated.

Vegetation Communities

The Project site primarily consists of vacant, undeveloped land that has been subject to a variety of anthropogenic disturbances that was historically used for agricultural land uses. No sensitive or undisturbed native habitats, or riparian/riverine resources are located within or adjacent to the Project site. The Project site currently contains 6.25 acres of the disturbed/developed vegetation community and 0.18 acre of ornamental (exotic) habitats, as shown on Exhibit 26 , and is dominated by ruderal species. All of the onsite vegetation would be removed during construction of the Project. A few native species commonly documented within disturbed habitats were also documented onsite. Scattered plant species documented onsite, include cheeseweed (*Malva parviflora*), red-stemmed filaree (*Erodium cicutarium*), tumbling pigweed (*Amaranthus albus*), ranchers fireweed (*Amsinckia menziesii*), California aster (*Corethrogyne filaginifolia*), doveweed (*Croton setigerus*), tree tobacco (*Nicotiana glauca*), castor bean (*Ricinus communis*), black mustard (*Brassica nigra*), Russian thistle (*Kali tragus*), horseweed (*Conyza canadensis*), and ripgut grass (*Bromus diandrus*).

The offsite improvement area consists of 1.22 acres of the disturbed/developed vegetation community located along Nance Street.

Based on the Project Tree Inventory including in Appendix C3 of this Initial Study, there are approximately 16 trees (4 species) located in the southern portion of the Project

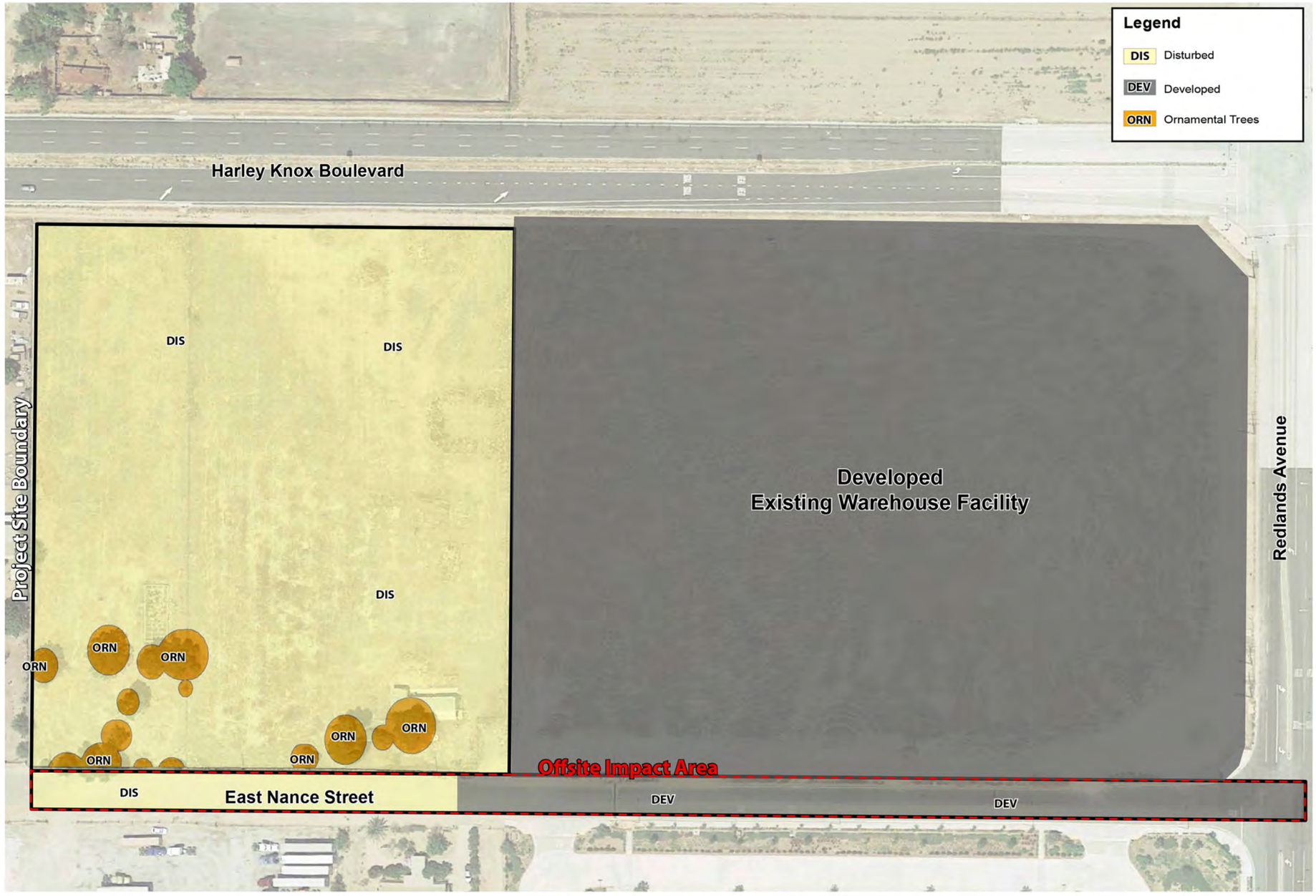


Source(s): CADRE Environmental (06-21-2021)

Exhibit 25

Not to Scale

MSHCP Relationship Map



Source(s): CADRE Environmental (06-21-2021)

Exhibit 26

Not to Scale

Vegetation Communities Map

site near the location of previous onsite residences including: 7 California peppertrees (*Schinus molle*), 6 Eucalyptus (5 *Eucalyptus sideroylon* and 1 *Eucalyptus Citriodara*), and 3 Afghan pine trees (*Pinus eldarica*).

Special Status Plant Species

The entire Project site and offsite improvement areas occur within a designated survey area for four Narrow Endemic and nine Criteria Area plant species, which are presented in Table 2, MSHCP Criteria Area & Narrow Endemic Plant Species Assessment, of the MSHCP Consistency Analysis included in Appendix C1 of this Initial Study. The majority of the Project Site possesses sensitive soils (Domino) often associated with several regionally occurring MSHCP target sensitive plant species. The majority of the Project site (disturbed areas) contains suitable habitat for smooth tarplant (*Centromadia pungens ssp. Laevis*), an MSHCP Criteria Area plant species.

As required by PVCCSP EIR mitigation measure MM Bio 6, floristic and focused plant surveys were conducted in order to identify all species observed on the Project site. None of the four MSHCP narrow endemic sensitive plant species were expected or detected during the Project site surveys and are therefore not expected to occur due to lack of observation or suitable habitat. Additionally, none of the nine MSHCP criteria area sensitive plant species, including smooth tarplant, were detected during the project surveys. Therefore, no impacts to sensitive plant species would result from implementation of the Project and no mitigation is required.

Special Status Wildlife Species

Birds

No riparian scrub, forest, or woodlands resources were observed within or adjacent to the Project site and offsite improvement areas. Therefore, no suitable habitat for the least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), or western yellow-billed cuckoo (*Coccyzus americanus*) is present on the site.

Burrowing Owl

The majority of the Project site and offsite improvement area is within a designated survey area for the burrowing owl. No burrows or structures representing suitable refugia or breeding resources were documented within the Project site. The burrowing owl is currently not present within the Project site. Therefore, focused surveys are not warranted. Although no habitat for the burrowing owl was identified, this species could colonize the property in the future. Therefore, the City is requiring completion of pre-construction surveys for burrowing owl per PVCCSP EIR mitigation measure MM Bio 2. With implementation of PVCCSP EIR mitigation measure MM Bio 2, impacts to burrowing owl would be less than significant and no additional mitigation is required.

Migratory Birds/Raptors

As identified in Section 4.3, Biological Resources, of the PVCCSP EIR:

> "Much of the PVCC area (exceptions include portions of the "developed" areas) provides foraging habitat for many raptor species, including special-status raptors. The loss of raptor habitat is covered

> and mitigated for through participation with the MSHCP. Direct impacts to raptors (and other migratory birds), including their active nests, are prohibited through the MBTA and California Fish and Game Code. As such, vegetation removals should be conducted outside of the nesting season, but if not feasible then nesting bird surveys, as required by mitigation measure MM Bio 1, shall be conducted prior to any removals."

The ornamental trees documented within and immediately adjacent to the Project Site are expected to potentially provide nesting habitat for common birds protected by CDFG Code Sections 3503, 3503.5, and 3513 and the MBTA. The loss of an active nest would be considered a potentially significant impact. Therefore, the City is requiring completion of a pre-construction field survey for avian nests of species protected by the MBTA or the CDFG Code per PVCCSP EIR mitigation measure MM Bio 1. With implementation of PVCCSP EIR mitigation measure MM Bio 1, impacts would be less than significant and no additional mitigation is required.

Mammals

As identified in Section 4.3, Biological Resources, of the PVCCSP EIR,

> "The PVCC does not occur within the Mammal Species Survey Area. As such, there are no survey or conservation requirements associated with mammals for the Project area. Portions of the PVCC Project area have some potential to support a few special-status small mammals, including the federally- and state-listed Stevens' Kangaroo Rat (SKR) (*Dipodomys stephensi*); however, any impact to these species would be covered and mitigated through compliance with the MSHCP, and with respect to SKR, also through the SKR Habitat Conservation Plan."

The Project site is within the PVCCSP area and has some potential to support small mammals, consistent with the conclusions in the PVCCSP EIR. Compliance with the MSHCP and payment of applicable mitigation fees would ensure that Project impacts to small mammals are less than significant, consistent with the findings of the PVCCSP EIR.

Amphibians

As identified in Section 4.3, Biological Resources, of the PVCCSP EIR, "the PVCC does not occur within the Amphibian Species Survey Area. As such, there are no survey or conservation requirements associated with amphibians for the PVCC Project area." No amphibians or hydrogeomorphic features (i.e., perennial creeks, ponds, lakes, and reservoirs) that would provide suitable habitat for amphibian species occur within the Project site. Therefore, the Project would not impact amphibians.

4b-4c. **No Impact.** The MSHCP Consistency Analysis included in Appendix C1 of this Initial Study, includes a determination of the presence of jurisdictional waters, riparian or riverine areas, and vernal pools in the survey area. No wetlands or jurisdictional resources regulated by the US Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), or RWQCB were documented within or immediately adjacent to the Project site. Additionally, no sensitive or undisturbed native communities were documented within or adjacent to the Project site. Therefore,

implementation of the Project would not impact riparian habitat, wetlands, or sensitive natural communities.

No evidence of vernal pools, seasonal depressions, seasonally inundated road ruts or other wetland features were recorded on the Project Site. A review of historic aerials was conducted to determine if inundated features were present during years of high rainfall when features would certainly be documented. No sign or indication of inundation was documented within the Project Site during a review of historic aerials. None of the conditions (i.e., no inundated depressions including road ruts, hydric soils, historic inundation, etc.) were observed or documented within the Project Site. No potential habitat for Riverside fairy shrimp (*Streptocephalus woottoni*) or vernal pool fairy shrimp (*Branchinecta lynchi*) was documented within the Project Site.

4d. **No Impact.** As identified in Section 4.3, Biological Resources, of the PVCCSP EIR, "Wildlife corridors are features whose primary function is to connect at least two significant wildlife habitat areas. These corridors may help to reduce or moderate some of the adverse effects of habitat fragmentation by facilitating dispersal of individuals between substantive patches of remaining habitat, allowing for both long-term genetic interchange and individuals to re-colonize habitat patches from which populations have been locally extirpated." An overview of wildlife corridors is also provided in the MSHCP Consistency Analysis.

Vegetation in the survey area consists disturbed and developed areas and ornamental landscaping. The Project Site is not located within an MSHCP designated core, extension of existing core, non-contiguous habitat block, constrained linkage, or linkage area. The Project would be confined to existing areas that have been previously disturbed and are isolated from regional wildlife corridors and linkages, and there are no riparian corridors, creeks, or useful patches of stepping stone habitat (natural areas) within or connecting the improvement areas to a recognized wildlife corridor or linkage. As such, development of the Project site and offsite improvement areas would not impact wildlife movement opportunities. Additionally, no known wildlife nursery sites are on or near the survey area.

The Project site is in an area already fragmented and divided by existing development and roadways. Few native habitats remain in the nearby surrounding areas and impacts to wildlife movement and habitat fragmentation have already occurred. No additional fragmentation of habitat would occur due to the Project. No impact would occur and no mitigation is required.

4e. **No Impact.** The City of Perris recognizes the healthful benefits of trees in the community, and the City's Municipal Code includes Section 19.71, Urban Forestry (Ordinance 1262). The purpose of this Ordinance is to (1) establish and maintain a healthy urban forest in the City of Perris; (2) create an Urban Forestry Board to guide the City in the establishment and care of its urban forest; (3) establish guidelines for the planting, care, and maintenance of trees within the City; (4) ensure the protection of trees during development and redevelopment of properties in the City; (5) avoid conflict between trees and utilities and other public improvements; and (6) identify public hazard and nuisance trees and establish removal procedures. The intent of this Ordinance is to establish, maintain, and protect a thriving urban forest to benefit all who live, visit, or work in the City of Perris. Under this Ordinance, the Planning Commission is designated as the Urban Forestry Board and is responsible for implementing the City's tree policies and programs, as well as setting the direction and scope of tree-related activities.

Sixteen ornamental trees are present on the southern portion of the Project site and mostly directly adjacent to Nance Street. According to the Project's Tree Inventory Report included as Appendix C3 in this Initial Study, the majority of the trees onsite are in poor condition due to lack of irrigation and proper tree maintenance. Most of the remaining other trees are beginning to show signs of decline in health as well. The trees in poor condition are not viable to be maintained in place, and relocation of any trees onsite is not recommended by the Project Arborist due to their current condition. Further, the Project Arborist recommends that any tree that is in severe decline, dead trees, and unmaintained trees be removed. (Earthwise, 2021)

The onsite trees are not protected by the City's Urban Forestry Ordinance since they do not meet the criteria for protected privately owned trees as presented in Section 19.71.050, Tree Protection, of the City's Municipal Code. Notably, the existing onsite private trees were not required as a project condition of approval, and they are not located on environmentally sensitive land. Further, as identified in the conceptual landscape plan provided on Exhibit 8, new trees would be planted onsite, including along Harley Knox Boulevard and Nance Street. The number of trees to be planted would exceed the number of trees to be removed, and the new trees would be protected by the City's Urban Forestry Ordinance. The removal of existing trees onsite, which are not protected, and the planting and maintenance of trees as part of the Project would comply with the City's Urban Forestry Ordinance, and no impacts would result.

4f. **No Impact.** As previously identified, the Project site and offsite improvement areas are within the Western Riverside County MSHCP. The Project site and offsite improvement areas are located in the City of Perris within the Mead Valley Area Plan of the MSHCP. The City is a permittee under the MSHCP and, while the Project is not specifically identified as a Covered Activity under Section 7.1 of the MSHCP, public and private development that are outside of Criteria Areas and Public/Quasi-Public Lands are permitted under the MSHCP, subject to consistency with MSHCP policies that apply to area outside of Criteria Areas. As such, to achieve coverage, the Project must be consistent with the following policies of the MSHCP:

- The policies for the protection of species associated with Riparian/Riverine areas and vernal pools as set forth in Section 6.1.2 of the MSHCP;
- The policies for the protection of Narrow Endemic Plant Species as set forth in Section 6.1.3 of the MSHCP;
- The requirements for conducting additional surveys as set forth in Section 6.3.2 of the MSHCP; and
- Guidelines pertaining to the Urban/Wildlands Interface intended to address indirect effects associated with locating Development in proximity to the MSHCP Conservation Area as detailed in Section 6.1.4 of the MSHCP.

As required by the MSHCP, and during the initial property assessment process, all Project Site APNs were searched using the Regional Conservation Authority (RCA) Geographic Information System (GIS) data to determine if the Project is within a "Criteria Area" and if additional surveys for narrow endemic/criteria area plant species or wildlife not adequately covered by the MSHCP may be required.

The MSHCP Urban/Wildlands Interface guidelines presented in Section 6.1.4 of the MSHCP are intended to address indirect effects associated with locating commercial, mixed uses and residential developments in proximity to a MSHCP Conservation Area. The fuels management guidelines presented in Section 6.4 of the MSHCP are intended to address brush management activities around new development within or adjacent to MSHCP Conservation Areas. The Project Site is not located adjacent to an existing or proposed MSHCP Conservation Area; therefore, these guidelines are not applicant to the Project.

Riparian/Riverine Areas and Vernal Pools

The MSHCP requires that an assessment be completed if impacts to riparian/riverine areas and vernal pools could occur from construction in support of the Project. According to the MSHCP, the documentation for the assessment shall include mapping and a description of the functions and values of the mapped areas with respect to the species listed in Section 6.1.2 of the MSHCP, Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools.

As discussed under Thresholds 4b and 4c above, no MSHCP Section 6.1.2 riparian, riverine or vernal pool resources were documented within or adjacent to the Project Site and preparation of an MSHCP Determination of Biological Equivalent or Superior Preservation (DBESP) is not required. No sign or indication of inundation, vernal pools, seasonal depressions, seasonally inundated road ruts, or other wetland features were recorded on the Project Site during a review of historic aerials. Therefore, no potential habitat for Riverside fairy shrimp or vernal pool fairy shrimp was documented within the Project site. No riparian scrub, forest or woodlands resources were documented within or adjacent to the Project Site. Therefore, no suitable habitat for sensitive species that occupy these habitats is present. The Project would not conflict with MSHCP Section 6.1.2.

Narrow Endemic Plant Species

Section 6.1.3 of the MSHCP, Protection of Narrow Endemic Plant Species, states that the MSHCP database does not provide sufficient detail to determine the extent of the presence/distribution of Narrow Endemic Plant Species within the MSHCP Plan Area. As previously identified, the entire Project Site occurs within a predetermined Survey Area for 13 narrow endemic and criteria area plant species, and suitable habitat for smooth tarplant, an MSHCP Criteria Area species, was documented within the disturbed areas onsite. No sensitive plant species, including smooth tarplant species, were observed during focused surveys. Therefore, no impacts to sensitive plant species would occur, and the Project would not conflict with Section 6.1.3 of the MSHCP.

Additional Survey Needs and Procedures

In accordance with Section 6.3.2 of the MSHCP, Additional Survey Needs and Procedures, additional surveys may be needed for certain species in order to achieve coverage for these species. The query of the RCA MSHCP Information Map and review of the MSHCP determined that the Project site is located within the designated survey area for burrowing owl as depicted in Figure 6-4 within Section 6.3.2 of the MSHCP. As discussed under Threshold 4a, no burrows or structures representing suitable refugia or breeding resources were documented within the Project site. The burrowing owl is currently not present within the Project site and focused surveys are not warranted.

However, the species could colonize the property in the future. Therefore, burrowing owl preconstruction surveys would be required to ensure protection for this species and consistency with the conservation goals as outlined in the PVSCCP EIR MM Bio-2. No other special-status wildlife species surveys were identified as being required.

Existing Habitat Conservation Plans and Critical Habitat

The Project site occurs within the Riverside County Habitat Conservation Agency Mitigation Fee Area for the long-term Stephens' Kangaroo Rat (SKR) HCP. The SKR HCP will continue to be implemented independently of the MSHCP and provides "take" authorization for SKR within its boundaries. Therefore, the Project would be assessed an SKR mitigation fee based on the fee structure already in place. Critical habitat is designated by the U.S. Fish and Wildlife Service (USFWS) and is defined as specific areas within a geographical range of a species at the time it is listed that include the physical or biological feature that are essential to the survival and eventual recovery of that species. The Project site and offsite improvement area are not located within a federally designated Critical Habitat. Therefore, the loss or adverse modification of a Critical Habitat would not occur as a result of the Project.

The Project would not conflict with the provisions of the Western Riverside County MSHCP and SKR HCP.

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

No Standards and Guidelines related to cultural resources are included in the PVCCSP. PVCCSP EIR mitigation measure MM Cultural 1 below outlines the requirements for preparation of a Phase I Cultural Resources Study and has been completed through preparation of the Phase I Cultural Resource Survey for the Harley Knox 2021 Project, 220-280 East Nance Street, Perris, California, (Cultural Resources Survey) prepared by Brian F. Smith and Associates, Inc. (BFSA) (June 2021) (BFSA, 2021a). The Cultural Resources Survey is included in Appendix D of this Initial Study and is summarized herein.

PVCCSP MM Cultural 1 *Prior to the consideration by the City of Perris of implementing development or infrastructure projects for properties that are vacant, undeveloped, or considered to be sensitive for cultural resources by the City of Perris Planning Division, a Phase I Cultural Resources Study of the*

subject property prepared in accordance with the protocol of the City of Perris by a professional archeologist[7] shall be submitted to the City of Perris Planning Division for review and approval. The Phase I Cultural Resources Study shall determine whether the subject implementing development would potentially cause a substantial adverse change to any significant paleontological, archaeological, or historic resources. The Phase I Cultural Resources Study shall be prepared to meet the standards established by Riverside County and shall, at a minimum, include the results of the following:

1. *Records searches at the Eastern Information Center (EIC), the National or State Registry of Historic Places and any appropriate public, private, and tribal archives.*
2. *Sacred Lands File record search with the NAHC followed by project scoping with tribes recommended by the NAHC.*
3. *Field survey of the implementing development or infrastructure project site.*

The proponents of the subject implementing development projects and the professional archaeologists are also encouraged to contact the local Native American tribes (as identified by the California Native Heritage Commission and the City of Perris) to obtain input regarding the potential for Native American resources to occur at the project site.

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

1. *Avoidance.*
2. *Changes to the structure provided pursuant to the Secretary of Interior's Standards.*
3. *Relocation of the structure.*
4. *Recordation of the structure to Historic American Buildings Survey (HABS)/Historic American Engineering Record (HAER) standard if demolition is allowed.*

Avoidance is the preferred treatment for known significant prehistoric and historical archaeological sites, and sites containing Native American human remains. Where feasible, plans for implementing projects shall be developed to avoid known significant archaeological resources and sites containing human remains. Where avoidance of construction impacts is possible, the implementing projects shall be designed and landscaped in a manner, which would ensure that indirect impacts from increased public availability to these sites are avoided. Where avoidance is selected, archaeological resource sites and sites containing Native American human remains shall be placed within permanent conservation easements or dedicated open space areas.

[7] For the purpose of this measure, the City of Perris considers professional archaeologists to be those who meet the United States Secretary of the Interior's standards for recognition as a professional, including an advanced degree in anthropology, archaeology, or a related field, and the local experience necessary to evaluate the specific Project. The professional archaeologist must also meet the minimum criteria for recognition by the Register for Professional Archaeologists (RPA), although membership is not required.

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

EXPLANATION OF CHECKLIST ANSWERS

Prior to conducting a field survey, BFSA conducted a California Historic Resources Information System (CHRIS) records search at the EIC at the University of California, Riverside (UCR). The EIC is a designated branch of the California Historical Resources Information System and houses records regarding archaeological and historic resources in Inyo, Mono, and Riverside Counties. Although no resources were recorded within the Project study area boundaries, as summarized below, the search results did identify 11 cultural resource properties located within one mile (see Table 1 of the Cultural Resources Survey included in Appendix D of this Initial study). The records search results also indicated there have been a total of 44 cultural resource studies conducted within a one-mile radius of the Project, one of which includes the Project site (2007 Study). The 2007 Study was a large overview of resources within the North Perris Industrial Specific Plan, which would later become the current PVCCSP. The 2007 Study included a focused survey, records search, literature review, and public outreach. Although the current Project site was not surveyed during that study, based on research, recent development, and cultural resource density, the current property was assigned a cultural resource sensitivity rating of moderate to high to contain cultural resources based on the property's status of not being extensively disturbed.

BFSA also reviewed the following historic sources at the EIC: the National Register of Historic Places (NRHP) Index, the Office of Historic Preservation (OHP) Archaeological Determinations of Eligibility, and the OHP Built Environment Resources Directory. BFSA also conducted archival research of the Project through review of Bureau of Land Management (BLM) General Land Office (GLO) records, historic maps, and aerial photographs, Riverside County Assessor's Office data, and Riverside County Transportation and Land Management (TMLA) records.

A survey of the Project site was completed by BFSA on April 19, 2021, in order to determine if cultural resources exist within the Project site or the offsite improvement area. The survey did not identify any cultural resources.

5a. **No Impact.** The Project site is located in a region of Riverside County that has a long and diverse history of human occupation and interaction. Prior to the arrival of the Spanish in the late 1700s, the area was occupied by Native American cultures, as further discussed in Section 18, Tribal Cultural Resources, and the Cultural Resources Survey included in Appendix D of this Initial Study. Starting in 1838, the Mexican government significantly changed the cultural landscape of the area with the establishment of land grants and the emergence of agricultural practices. By 1850, California was admitted to the United States and became the 31st state of the Union. This event ushered in a new wave of migrants and was responsible for the rapid development and urbanization of Riverside County. With this wave of immigration came the arrival of farmers, railroads, and eventually the United States military.

Two of the recorded resources within one-mile of the Project site are prehistoric bedrock milling features and an associated lithic scatter located over a ½-mile east of the Project site. The remaining resources identified during the records search are historic, consisting of water conveyance and irrigation features, historic structure

foundations and pads, and a segment of the Perris Valley Storm Drain. None of these historic resources were identified on the Project site or offsite improvements areas.

Except for a land patent confirming the subject property's inclusion in the Rancho San Jacinto Nuevo y Portrero land grant, no other documents are on file with the BLM GLO for the Project site. However, documents on file with the County of Riverside TLMA and the County of Riverside Assessor's Office indicate that the Project site was subdivided in 1891 as part of the Riverside Tract. The Riverside Tract was originally held by the Perris Irrigation District (Perris Land Company) and was named by the original investors, almost all of whom resided in the city of Riverside. The land was laid out in 80-acre blocks that were subdivided into 10-acre lots. The Project site comprised the eastern three-fourths of Block 1, Lot 7. The Riverside Tract lots were sold to farmers and speculators, which was intended to guarantee the success of the Perris Irrigation District; however, the inability to secure steady access to water limited success in the area. As such, by 1900, many of the properties had failed. Despite the failure of many of the original farm lots, the area surrounding the Project site proved to be a successful agricultural region. In 1982, Lot 7 was subdivided into four 2.5-acre parcels that were annexed into the City of Perris in 1986 (Parcel Map 18223); the Project site includes the three eastern parcels. Between 2014 and 2016, Harley Knox Boulevard was extended through the northern portion of these parcels, which removed approximately 0.5 acres from them.

Aerial photographs show the property as vacant agricultural land as early as 1938 until sometime between 1978 and 1997. The two buildings associated with the foundations in the southern portion of the site were constructed between 1978 and 1997 and are therefore not historic in age. Both buildings were demolished prior to the date of the survey in April 2021 and only the foundations remain. Further, the entire disturbed Project site and offsite improvement area consists of disturbed and developed areas and ornamental (non-native) vegetation, which are not considered historic landscape.

Based on the literature review and the field survey conducted, no historic resources currently exist at the Project site or offsite improvement areas. Therefore, no impacts to historic resources would result with implementation of the Project, and no mitigation is required.

5b. **Less than Significant with Mitigation Incorporated.** The Project site is located in a region of Riverside County that has a long and diverse history of human occupation and interaction. Prior to the arrival of the Spanish in the late 1700s, the area was occupied by Native American cultures, as further discussed in the Tribal Cultural Resources section of this Initial Study. These early Californians were complex hunter and gathering people who lived in seasonal campsites to developed villages located near viable water sources.

Although the records search identified two prehistoric resources within one mile of the project, both are located over a half-mile east of the project. Further, the property was historically utilized for agriculture and did not contain any structures until sometime after 1978, limiting the potential for historic resources. Therefore, based upon the records search data and the archaeological study, no known resources, historic or prehistoric, are located within the Project site. As a result of previous ground disturbing activities associated with historical agricultural use, modern development, and the construction of Harley Knox Boulevard, there is a reduced potential for cultural resources to be present or disturbed by the Project. The Cultural Resources Survey recommends no further archaeological study or mitigation monitoring for cultural

resources. However, the City of Perris understands that there is often the potential for prehistoric and Native American resources to be discovered during ground disturbing activities. The City of Perris has developed a standard mitigation measure in coordination with input from Native American tribal representatives to manage unanticipated discoveries of archaeological and Native American resources when monitoring is not required by the Phase 1 cultural resources survey. Implementation of mitigation measure MM 5-1 presented below, which identifies steps to be taken to identify and protect any resources encountered, would reduce this potential impact to a less than significant level. Mitigation Measure MM 5-1 replaces PVCCSP EIR mitigation measures MM Cultural 2, MM Cultural 3, and MM Cultural 4.

5c. **Less Than Significant with Mitigation Incorporated.** As identified in the Initial Study for the PVCCSP EIR, the PVCCSP area "has been historically used for agriculture use and therefore, is not expected to contain human remains, including those interred outside of formal cemeteries." Due to the lack of any indication of a formal cemetery or informal family burial plots on site, the Project would have no impact on known human remains." In the unlikely event that suspected human remains are uncovered during construction, all activities in the vicinity of the remains shall cease and the contractor shall notify the County Coroner immediately pursuant to Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the California Public Resources Code. Therefore, impacts to disturbing human remains are less than significant. In addition, mitigation measure MM 5-2, which is an updated version of PVCCSP EIR mitigation measure MM Cultural 6, further identifies measures that would be taken in the event of the discovery of human remains and would be implemented to further reduce this less than significant impact.

ADDITIONAL MITIGATION MEASURES

Mitigation measure MM 5-1 below implements PVCCSP EIR mitigation measures MM Cultural 2 through MM Cultural 4, as subsequently revised by the City of Perris.

MM 5-1 Prior to the issuance of grading permits, the Project proponent/developer shall retain a professional archaeologist meeting the Secretary of the Interior's Professional Standards for Archaeology (U.S. Department of Interior, 2012; Registered Professional Archaeologist preferred). The primary task of the consulting archaeologist shall be to monitor the initial ground-disturbing activities at both the subject site and any off-site project-related improvement areas for the identification of any previously unknown archaeological and/or cultural resources. Selection of the archaeologist shall be subject to the approval of the City of Perris Director of Development Services and no ground-disturbing activities shall occur at the site or within the off-site Project improvement areas until the archaeologist has been approved by the City.

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

In the event that archaeological resources are discovered at the Project site or within the off-site Project improvement areas, the handling of the discovered

resource(s) will differ, depending on the nature of the find. Consistent with California Public Resources Code Section 21083.2(b) and Assembly Bill 52 (Chapter 532, Statutes of 2014), avoidance shall be the preferred method of preservation for Native American/tribal cultural/archaeological resources. However, it is understood that all artifacts, with the exception of human remains and related grave goods or sacred/ceremonial/religious objects, belong to the property owner. All artifacts, Native American or otherwise, discovered during the monitoring program shall be recorded and inventoried by the consulting archaeologist.

If any artifacts of Native American origin are discovered, all activities in the immediate vicinity of the find (within a 50-foot radius) shall stop and the project proponent and project archaeologist shall notify the City of Perris Planning Division and the Soboba Band of Luiseño Indians and the Pechanga Band of Luiseño Indians. A designated Native American representative from either the Soboba Band of Luiseño Indians or the Pechanga Band of Luiseño Indians shall be retained to assist the project archaeologist in the significance determination of the Native American as deemed possible. The designated Luiseño tribal representative will be given ample time to examine the find. The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA and shall consider the religious beliefs, customs, and practices of the Luiseño tribe. If the find is determined to be of sacred or religious value, the Luiseño tribal representative will work with the City and consulting archaeologist to protect the resource in accordance with tribal requirements. No recordation of sacred items is permitted without the written consent of the assisting Native American tribal government(s). All analysis will be undertaking in a manner that avoids destruction or other adverse impacts.

In the event that human remains are discovered at the project site or within the off-site project improvement areas, mitigation measure MM 5-2 shall immediately apply and all items found in association with Native American human remains shall be considered grave goods or sacred in origin and subject to special handling.

To the extent feasible, Native American artifacts that are discovered at the site shall be relocated/reburied at the project site and would be subject to a fully executed relocation/reburial agreement with the assisting Luiseño tribe. This shall include, but not be limited to, an agreement that artifacts will be reburied on-site and in an area of protection in perpetuity, and that reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist.

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

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

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

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

Mitigation measure MM 5-2 below implements PVCCSP EIR mitigation measure MM Cult 6, as subsequently revised by the City of Perris.

MM 5-2 In the event that human remains (or remains that may be human) are discovered at the Project site of within the off-site Project improvement areas during ground-disturbing activities, the construction contractors, Project archaeologist, and/or designated Luiseño tribal representative shall immediately stop all activities within 100 feet of the find. The project proponent shall then inform the Riverside County Coroner and the City of Perris Planning Division immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).

If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the “Most Likely Descendent” (MLD). Despite the affiliation with any Luiseño tribal representative(s) at the site, the NAHC’s identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of Native American human remains and may recommend to the project proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave goods. The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains will be determined in consultation between the project proponent and the MLD. In the event that there is disagreement regarding the disposition of the remains, State law will apply and median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98l and 5097.94(k)).

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

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

No PVCCSP Standard and Guidelines are applicable to the analysis of energy. PVCCSP EIR mitigation measure MM Air 19 and mitigation measure MM Air 20 previously presented in the Air Quality section of this Initial Study would assist in the reduction of energy usage. However, as a conservative measure, to provide a worst-case disclosure of the Project's impacts, no credit has been assumed in the Energy analysis from these mitigation measures.

Explanation of Checklist Answers

Energy was added in December 2018 as a topic in the Environmental Checklist included in Appendix G of the State CEQA Guidelines. Energy consumption was not specifically addressed in the PVCCSP EIR. This section summarizes the Harley Knox Commerce Center Energy Analysis (Energy Analysis) prepared by Urban Crossroads (Urban Crossroads, 2022c), which is provided in Appendix E of this Initial Study and summarized herein.[8] The purpose of this report is to ensure that energy use is considered by the City of Perris, as the lead agency, and to quantify anticipated energy usage associated with construction and operation of the Project, determine if the usage amounts are efficient, typical, or wasteful for the land use type, and to emphasize avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. The Project site is currently undeveloped and does not include any uses or activities that generate a substantive amount of energy use.

6a. Less Than Significant Impact.

Energy Use During Construction

Construction of the Project would consume electricity and fuel from construction equipment use. Construction workers and construction vendor/hauling trips would also consume fuel. The estimated power cost of onsite electricity usage during the construction of the Project is assumed to be around $8,634.14. Additionally, based on the assumed power cost, it is estimated that the total electricity usage during construction is calculated to be around 77,367 kilowatt-hours (kWh).

Construction equipment used by the Project would result in single event consumption of approximately 63,429 gallons of diesel fuel. The equipment used for Project

[8] At the time the Energy Analysis was prepared, the Project was proposed to consist of a 156,780-sf building compared to the currently proposed 156,094-sf building (a difference of 686 sf). Therefore, the analysis is conservative as it is based development of a slightly larger building.

construction would conform to CARB regulations and California emissions standards. There are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient, wasteful, or unnecessary consumption of fuel.

The Project would utilize construction contractors which practice compliance with applicable CARB regulations regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. Compliance with anti-idling and emissions regulations would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption.

Additionally, certain incidental construction-source energy efficiencies would likely accrue through implementation of California regulations and best available control measures (BACM). More specifically, California Code of Regulations Title 13, Motor Vehicles, Section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. In this manner, construction equipment operators are informed that engines are to be turned off at or prior to five minutes of idling. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials and/or in response to citizen complaints.

Construction worker trips for full construction of the Project would result in the estimated fuel consumption of 17,153 gallons of fuel. Additionally, fuel consumption from construction vendor trips (medium-heavy duty trucks [MHDT] and heavy-heavy duty trucks [HHDT]) would total approximately 8,946 gallons. Diesel fuel would be supplied by City and regional commercial vendors. Indirectly, construction energy efficiencies and energy conservation would be achieved through the use of bulk purchases, transport and use of construction materials. The 2021 Integrated Energy Policy Report (IEPR) released by the California Energy Commission (CEC) has shown that fuel efficiencies are getting better within on- and off-road vehicle engines due to more stringent government requirements. As supported by the preceding discussions, Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

In general, the construction processes promote conservation and efficient use of energy by reducing raw materials demands, with related reduction in energy demands associated with raw materials extraction, transportation, processing and refinement. Use of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations.

Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Energy Use During Project Operation

Transportation Energy Demands

Annual vehicular trips and related VMT generated by the operation of the Project would result in an estimated 9,518 gallons of fuel consumption per year for light-duty autos (LDAs), 1,191 gallons of fuel for light-duty trucks 1 (LDT1)[9], 3,893 gallons of fuel for LDT2s[10], 4,090 gallons for fuel for medium-duty trucks (MDVs); and 379 gallons of fuel for motorcyclists (MCY). Additionally, the operation of the Project would result in an estimated 11,729 gallons of fuel consumption per year for light-heavy duty (LHD) trucks, an estimated 20,597 gallons of fuel consumption per year for MHDT, and 90,528 gallons of fuel consumption per year for HHDT for the year 2022. The total estimated annual fuel consumption from Project generated VMT would result in a fuel demand 141,926 gallons of fuel.

Fuel would be provided by current and future commercial vendors. Trip generation and VMT generated by the Project are consistent with other industrial uses of similar scale and configuration, as reflected respectively in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Ed., 2021); and CalEEMod. That is, the Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT, nor associated excess and wasteful vehicle energy consumption.

Enhanced fuel economies realized pursuant to federal and State regulatory actions, and related transition of LDAs, LDT1s, LDT2s, MDVs, and LHDs to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. The Project includes the construction of sidewalks along site-adjacent roadways, facilitating and encouraging pedestrian access. Facilitating pedestrian and bicycle access would reduce VMT and associated energy consumption, although no such reductions in VMT or associated energy consumption are made in this Initial Study. In compliance with the California Green Building Standards Code, the Project would promote the use of bicycles as an alternative mean of transportation by providing short-term and/or long-term bicycle parking accommodations. Therefore, the Project's transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Facility Energy Demands

Building operations and site maintenance activities associated with the Project would result in the consumption of electricity and potentially natural gas. Annual electricity demands from Project operations are estimated at 395,246 kWh/year of electricity.

Pursuant to Section 5.106.5.3.2 of the CALGreen Code, seven parking spaces would provide conduits for the charging of electric vehicles (EV); however, the energy analysis conservatively assumes that conduits would be provided at four EV parking spaces. In the event conduits for the four EV parking spaces are installed, this would result in a 28,224 kWh/year. However, though the Project's energy usage would be

[9] Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.
[10] Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

increased with the installation of the EV parking spaces, there would be a decrease in annual VMT of 112,896 miles/year and thus an overall savings in fuel demand of 3,399 gallons.

The Project proposes conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. The Project does not propose uses that are inherently energy intensive and the energy demands in total would be comparable to other industrial uses of similar scale and configuration. Additionally, the Project would be required to comply with applicable Title 24 standards, which would ensure that the Project's energy demand would not be considered inefficient, wasteful, or otherwise unnecessary.

Therefore, the Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation. This impact is less than significant and no mitigation is required.

6b. **No Impact**. The following section analyzes the Project's consistency with the applicable federal and State regulations.

Consistency with Federal Energy Regulations

Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions.

> **Consistent.** *Transportation and access to the Project site is provided primarily by the local and regional roadway systems, which include but are not limited to I-215, Harley Knox Boulevard, and Nance Street. Implementation of the Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because SCAG is not planning for intermodal facilities on or through the Project site.*

The Transportation Equity Act for the 21st Century (TEA-21)

The Transportation Equity Act for the 21st Century (TEA-21) was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety.

Consistent. *The Project site is located along major transportation corridors with proximate access to the interstate freeway system (i.e., I-215). The location of the Project site facilitates access, acts to reduce VMT, takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar industrial uses. Accordingly, the Project supports the strong planning processes emphasized under TEA-21 and is therefore consistent with, and would not otherwise interfere with or obstruct implementation of TEA-21.*

Consistency with State Energy Regulations

Integrated Energy Policy Report

Senate Bill 1389 (SB 1389) (Bowen, Chapter 568, Statutes of 2002) requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety. The CEC prepares these assessments and associated policy recommendations every two years, with updates in alternate years, as part of the Integrated Energy Policy Report. The 2021 IEPR was adopted February 22, 2022, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2021 IEPR provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the state is to meet its climate, energy, air quality, and other environmental goals while maintaining reliability and controlling costs. Additionally, the 2021 IEPR provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the state is to meet its climate, energy, air quality, and other environmental goals while maintaining reliability and controlling costs.

Consistent. *Electricity would be provided to the Project by SCE. SCE's Clean Power and Electrification Pathway (CPEP) white paper builds on existing State programs and policies. As such, the Project is consistent with, and would not otherwise interfere with nor obstruct implementation of the goals presented in the 2020 IEPR*.

State of California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

Consistent. *The Project site is located along Harley Knox Boulevard and Nance Street with proximate access to I-215. The location of the Project site facilitates access and takes advantage of existing infrastructure systems. Therefore, the Project supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with nor obstruct implementation of the State of California Energy Plan.*

California Code Title 24, Part 6, Energy Efficiency Standards

California Code of Regulations Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2019 version of Title 24 was adopted by the CEC and will become effective on January 1, 2020. The 2019 Title 24 standards require solar PV systems for new homes, establish requirements for newly constructed healthcare facilities, encourage demand responsive technologies for residential buildings, and update indoor and outdoor lighting standards for nonresidential buildings. The CEC anticipates that nonresidential buildings will use approximately 30 percent less energy due to lighting upgrades.

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

> **Consistent.** *The Project's building shells and building components, such as windows; roof systems; electrical and lighting systems; and heating, ventilating, and air conditioning (HVAC) systems would be designed to meet 2019 Title 24 Standards. Consistent with State law, the Project also would be designed, constructed, and operated to meet or exceed Title 24 Energy Efficiency Standards. Additionally, the Project would include seven parking spaces that provide conduits for the charging of EVs, and a lighting system that meets established lighting requirements. On this basis, the Project is determined to be consistent with, and would not interfere with nor otherwise obstruct implementation of Title 24 Energy Efficiency Standards.*

AB 1493 Pavley Regulations and Fuel Efficiency Standards

California Assembly Bill (AB) 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks). Although aimed at reducing GHG emissions, specifically, a co-benefit of the Pavley standards is an improvement in fuel efficiency and consequently a reduction in fuel consumption.

> **Consistent.** *AB 1493 is not applicable to the Project as it is a statewide measure establishing vehicle emissions standards. No feature of the Project would interfere with implementation of the requirements under AB 1493.*

California's Renewable Portfolio Standard (RPS)

First established in 2002 under Senate Bill (SB) 1078, California's RPS requires retail sellers of electric services to increase procurement from eligible renewable resources to 33 percent of total retail sales by 2020.

> **Consistent.** *California's RPS is not applicable to the Project as it is a statewide measure that establishes a renewable energy mix. No feature of the Project would interfere with implementation of the requirements under RPS.*

SB 350— Clean Energy and Pollution Reduction Act of 2015

In October 2015, the legislature approved, and the Governor signed, SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.

- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the CEC, and local publicly-owned utilities.

- Reorganize the Independent System Operator (ISO) to develop more regional electricity transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

Consistent. *The Project would use energy from SCE, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. No feature of the Project would interfere with implementation of SB 350. Additionally, the Project would be designed and constructed to implement the energy efficiency measures for new industrial developments and would include several measures designed to reduce energy consumption.*

In summary, The Project would not conflict with any of the state or local plans. As such, no impact would occur and no mitigation is required.

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

No PVCCSP Standard and Guidelines are applicable to the analysis of geology and soils. The PVCCSP EIR includes mitigation measure MM Geo 1 for potential impacts related to geology and soils. This measure is applicable to and incorporated in the Project. Implementation of this measures is assumed in the analysis presented in this section.

As required by PVCCSP EIR mitigation measure MM Geo 1 presented below, a Geotechnical Investigation - Proposed Warehouse Development 220 to 280 East Nance Street, Perris, California (Geotechnical Investigation) has been prepared for the Project by NorCal Engineering (June 10, 2021) (NorCal Engineering, 2021). The Geotechnical Investigation is included in Appendix F of this Initial Study and is summarized herein.

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

EXPLANATION OF CHECKLIST ANSWERS

Information presented in this section is derived primarily from the site-specific Geotechnical Investigation prepared for the Project and provided in its entirety in Appendix F of this Initial Study. The Geotechnical Investigation included a visual site reconnaissance, four subsurface exploratory borings to depths of a maximum of 51.5 feet bgs, field and laboratory testing of soil samples, geotechnical engineering analysis to provide criteria for preparing Project design, and preparation of the geotechnical investigation.

The PVCCSP EIR cites the following related regulations applicable to the analysis of geology and soils: Uniform Building Code, California Building Code, Seismic Hazards Mapping Act, and City of Perris Ordinance No. 1230. Ordinance No. 1230 gives the Development Services Department the authority to review and enforce the application of Building, Mechanical, Plumbing, Electrical, and Fire Codes established in the City to ensure that development does not pose a threat to the health, safety, and welfare of the public. The discussion of related regulations in the PVCCSP EIR is incorporated by reference. In addition, applicable policies and measures from the Safety Element of the City of Perris General Plan related to seismic risk are provided in the PVCCSP EIR. Of these, the Safety Element policies applicable to this analysis for the Project include:

Policy I.E All development will be required to include adequate protection from damage due to seismic incidents.

Measure I.E.1 Require geological and geotechnical investigations by State-licensed professionals in areas with potential for earthquake-induced liquefaction, landsliding, other slope instability, or settlement as part of the environmental and development review process.

Measure I.E.2 Require implementation of mitigation measures identified in such investigations mentioned above [in Measure I.E.1], prior to the issuance of grading and building permits.

Measure I.E.5 Adopt and enforce the most current version of the *California Building Code* (CBC).

It is noted that requirements for geotechnical investigations by State-licensed professionals meeting specified criteria and subsequent implementation of recommendations to alleviate any geologic or seismic constraints identified in the investigation, as described in the City General Plan, are also part of the CBC.

7a(i). **No Impact.** The PVCCSP EIR Initial Study determined that the Specific Plan area is not located in an Alquist-Priolo Earthquake Fault Zone, and no other known faults are in the vicinity. Also, the City of Perris General Plan states that no Alquist-Priolo zones

are in the City (City of Perris, 2016). The Project site is outside any Alquist-Priolo Special Studies Zone (NorCal Engineering, 2021). There would be no impact related to surface rupture at the site and no mitigation is required.

7a(ii). **Less Than Significant Impact.** The PVCCSP EIR Initial Study determined that the Specific Plan area would be subject to strong ground shaking, typical of Southern California, and that design and construction in accordance with current building codes and all geotechnical recommendations would reduce impacts from ground shaking to a less than significant level.

The PVCCSP EIR and the CBC, as adopted by the City, provide guidelines and parameters that reduce the effects of ground shaking produced by regional seismic events; and the Project Applicant shall implement seismic design considerations in accordance with the CBC, which is reflected in General Plan Measure I.E.5.

Consistent with PVCCSP EIR mitigation measure MM Geo 1 above, a site-specific Geotechnical Investigation has been prepared by a registered geotechnical engineer. The nearest earthquake fault is the San Jacinto Valley fault zone, located approximately 7.5 miles northeast of the site. The maximum credible magnitude earthquake for the San Jacinto Valley fault is 6.9. The Geotechnical Investigation includes site-specific seismic design parameters and provides design/construction recommendations for site grading, temporary excavation and shoring design, foundation design, settlement, lateral resistance, retaining wall design parameters, floor slab design, expansive soil, utility trench and excavation backfill, corrosion design, and preliminary pavement design. Consistent with General Plan policies cited above, the Project would be designed and constructed in accordance with the Geotechnical Investigation recommendations (referred to as mitigation measures in General Plan Measure I.E.2 above), which are based on CBC and City of Perris requirements. The Geotechnical Investigation concludes that the Project is acceptable from a geotechnical engineering standpoint and that by following the recommendation and guidelines set forth in the Geotechnical Investigation the structures and grading would be safe from excessive settlements under the anticipated design loadings and conditions. Therefore, with compliance with City General Plan policies and the recommendations of the final Geotechnical Investigation, impacts related to strong seismic ground shaking would be less than significant, and no further mitigation is required.

7a(iii). **Less Than Significant Impact.** The PVCCSP EIR Initial Study (Section 3) determines that the Specific Plan area includes locations with varying liquefaction potential, from low to very high, and the site-specific geotechnical studies shall determine the liquefaction risk for each project.

The Project site lies within areas mapped as potentially liquefiable by the County of Riverside Safety Element (Riverside County, 2016) Based on the liquefaction evaluation conducted as part of the Geotechnical Investigation (NorCal Engineering, 2021), the potential for liquefaction at the project site is moderate based on a historic groundwater depth of 19-feet-deep (based on review of groundwater maps of the Upper Santa Ana River Basin), and a peak ground acceleration of 0.5891g. The associated seismic-induced settlements would be on the order of 2.5 inches and would occur uniformly across the Project site. Differential settlements would be on the order of 1.5 inches over a 50-foot (horizontal distance).

Consistent with General Plan measures cited above, the Project would be designed and constructed in accordance with all final Geotechnical Investigation recommendations (referred to as mitigation measures in General Plan Measure I.E.2 above) and the Geotechnical Investigation shall be reviewed and approved by the City Engineer. Therefore, with compliance with City General Plan measures and the recommendations of the final Geotechnical Investigation, impacts related to liquefaction and other ground failure would be less than significant, and no additional mitigation is required.

7a(iv). **No Impact**. The PVCCSP EIR Initial Study (Section 3) concludes that there would be no impacts related to landslides, as the Specific Plan area is relatively flat and not located near any areas that possess potential landslide characteristics. Onsite elevations are about 1,455 to 1,456 feet amsl, and the elevations of adjacent parcels are similar. There would be no impacts related to landslides.

7b. **Less Than Significant Impact.** The PVCCSP EIR Initial Study determines that no long-term soil erosion would occur, as Specific Plan projects would involve the development of structures, paving (i.e., hardscape), and landscaping; short-term construction-related erosion potential would be addressed through compliance with NPDES permit requirements, and impacts would be less than significant.

The largest source of erosion and topsoil loss, particularly in a developed environment, is uncontrolled drainage during construction. The Project site is relatively flat, and surface water flows generally to the south. Ground disturbance (including over-excavation, utility trenching, and foundation excavation during construction activities on exposed soils) could lead to erosion and topsoil loss during heavy rains. Grading for the Project would be limited to minor cuts and fills to establish design grades and to prepare building foundations.

The PVCCSP EIR (Section 4.7, Hydrology and Water Quality) cites the following related regulations applicable to the analysis of surface water quality during construction and operation of a Project: Clean Water Act, State Water Resources Control Board and associated NPDES permitting requirements, and Chapter 14.22, Stormwater/Urban Runoff Management and Discharge Control, of the Perris Municipal Code (City of Perris, 2021). To control erosion during construction of the Project, construction activities shall be conducted in compliance with the current statewide NPDES General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities adopted by the State Water Resources Control Board (SWRCB), as further discussed in the Hydrology and Water Quality section of this Initial Study. Specifically, consistent with Measure VI.A.3 of the General Plan Conservation Element, proof of the appropriate NPDES Permit (RWQCB San Jacinto Watershed Construction Activities Permit) and a Storm Water Pollution Prevention Plan (SWPPP) must be provided to the City prior to issuance of a grading permit for the Project site. Therefore, with compliance with General Plan Measure VI.A.3, impacts related to erosion during construction would be less than significant.

Regarding erosion during long-term Project operation, consistent with the PVCCSP EIR Initial Study, the Project site would be landscaped or covered with impervious surfaces and surface runoff would be captured and treated by an onsite storm drain and water quality treatment system. Implementation of the Project would result in less long-term erosion and loss of topsoil than under the Project site's existing conditions. The City's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare and submit to the City for approval a WQMP. The

WQMP identifies an effective combination of erosion control and sediment control measures (i.e., BMPs) to reduce or eliminate sediment discharge to surface water from stormwater and non-stormwater discharges. The Preliminary WQMP for the Project, prepared by Thienes Engineering, Inc. (Thienes) (included in Appendix J of this Initial Study), incorporates catch basin and roof drain filters, which would pre- treat storm water runoff before enters the underground infiltration galleries These design features would be effective at removing silt and sediment from stormwater runoff, and the Preliminary WQMP requires post-construction maintenance and operational measures to ensure ongoing erosion protection. Compliance with the Preliminary WQMP would be required as a condition of Project approval and long-term maintenance of onsite water quality features is required. Therefore, the Project would not result in substantial erosion or loss of top soil during long-term operation. The Project's impact would be less than significant, and no mitigation is required.

7c. **Less Than Significant Impact.** The PVCCSP EIR Initial Study (Section 3) determines that the potential for lateral spreading and landslide is low, as the Specific Plan area is relatively flat; however, the potential for subsidence is high. Seismic-related ground failure is addressed under Threshold 7a(iii) above. Expansive soil is addressed under Threshold 7d below.

The Geotechnical Investigation determines that the Project site is underlain by artificial fill and disturbed top soils to depths of approximately 1 to 1.5 feet and native soils beneath the fill soils. The soils are classified as silty sand to sandy silt and are soft to firm and damp to moist. The native soil is classified as sandy silt to clayey sand and are medium stiff to stiff and damp to moist.

Existing onsite vegetation, organic ladens soils, and fill soils are unsuitable for the support of the proposed structure. Per the recommendation in the Geotechnical Investigation, removal of the vegetation and organic laden soils is required, and fill soils would be removed and recompacted. Due to the potential for differential settlement of structures supported on both compacted fill and native soils, foundations would be underlain by a uniform compacted fill blanket. Building floor slabs would also be underlain by a minimum of 2 feet of compacted fill soils. When the grading recommendations are completed, the post-construction shrinkage and subsidence, lateral resistance, and settlement are expected to be within acceptable limits. The in-place density tests reveal soil shrinkage of 8 to 10 percent due to excavation and recompaction. Minor ground subsidence is estimated at 0.08 feet due to settlement and machinery working. The results of the soluble sulfate testing indicate that the selected samples of the onsite soils contain negligible concentrations of soluble sulfates. Additionally, the potential corrosive effects of onsite on buried metallic structures were tested; the resistivity tests indicate a slightly acidic condition, which is representative of moderately corrosive soils and metallic structure should be protected.

Consistent with General Plan measures cited above and PVCCSP EIR mitigation measure MM Geo 1, the Project would be designed and constructed in accordance with all Geotechnical Investigation recommendations (referred to as mitigation measures in General Plan Measure I.E.2 above); and the Geotechnical Investigation shall be reviewed and approved by the City Engineer. Therefore, with compliance with City General Plan measures and the recommendations of the final Geotechnical Investigation, impacts related to location on an unstable geologic unit or soil would be less than significant; and no additional mitigation is required.

7d. **Less Than Significant Impact.** Expansive soils are fine-grained silts and clays that are subject to swelling and contracting. The PVCCSP Initial Study determines that the five U.S. Department of Agriculture soil types identified in the Specific Plan area have low expansion potential. Soil samples and laboratory testing conducted as part of the Geotechnical Investigation indicate that the upper 5 feet of soils are low in expansion potential. Consistent with General Plan measures cited above and PVCCSP EIR mitigation measure MM Geo 1, the Project would be designed and constructed in accordance with all final Geotechnical Investigation recommendations (referred to as mitigation measures in General Plan Measure I.E.2 above); and the Geotechnical Investigation shall be reviewed and approved by the City Engineer. Therefore, with compliance with City General Plan measures, the recommendations of the final Geotechnical Investigation, and PVCCSP EIR mitigation measure MM Geo 1, impacts related to expansive soils would be less than significant; no additional mitigation is required.

7e. **No Impact.** The Project would be connected to an existing sewer line in Nance Street for conveyance of wastewater to treatment facilities, and there would be no impact related to onsite soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems.

7f. **Less Than Significant with Mitigation Incorporated.** A Paleontological Resource Assessment for the Harley Knox 2021 Project was prepared by BFSA (June 10, 2021) (Paleontological Resources Assessment) (BFSA, 2021b), is included in Appendix G of this Initial Study, and is summarized herein.

The closest known fossil localities to the Project site are reported in a paleontological literature review and collections and records search conduced for the Ecos Energy Project in the Lakeview Hot Springs area southeast of the Perris Reservoir and approximately three miles east of the Project site. The record search was conducted by a vertebrate paleontologist in the Division of Geological Sciences at the San Bernardino County Museum (SBCM) in Redlands in 2013. The Ecos Energy Project is underlain by the same sedimentary deposits as the Project site. Fossil vertebrates collected from these localities, within 0.25-mile to 0.5-mile of the Ecos Energy Project, include mammoths, extinct horses, and extinct bison. The records search report indicated that older Pleistocene alluvial fan deposits have a high potential to contain significant nonrenewable paleontological resources (i.e., fossils), and were thus assigned a “high paleontological resource sensitivity.” Similar older Pleistocene sediments throughout the lowland (valley) areas of western Riverside County and the Inland Empire have been reported to yield significant fossils of extinct terrestrial mammals from the last ice age, such as mammoths, mastodons, giant ground sloths, dire wolves, short-faced bears, saber-toothed cats, large and small horses, camels, and bison.

Based on the Paleontological Sensitivity Map (Exhibit CN-7) in the Conservation Element of the City’s Comprehensive General Plan 2030, the Project site is located within Area 4 for paleontological sensitivity and assigned a “low to high” paleontological sensitivity based on the presence of the Pleistocene older valley deposits (high sensitivity) underlying young alluvium at the surface (low sensitivity). The Society of Vertebrate Paleontology guidelines on paleontological sensitivity concur with this categorization. Measure IV.A.4 of the City of Perris General Plan Conservation Element requires paleontological monitoring beginning at a depth of five feet for project sites located in Paleontological Sensitive Area 4.

There is potential to encounter previously unknown unique paleontological resources during construction activities. This could result in a significant impact to paleontological resources. Based on (1) the existence of potentially fossiliferous Pleistocene alluvial fan deposits underlying young alluvium mapped across the Project site; (2) the known occurrence of terrestrial vertebrate fossils at shallow depths from Pleistocene older alluvial fan sediments across the Inland Empire of western Riverside County; and (3) the high paleontological sensitivity typically assigned to Pleistocene alluvial fan sediments for yielding paleontological resources, paleontological monitoring would be required during mass grading, trenching, and excavation activities in undisturbed Pleistocene older alluvial fan sediments in order to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources, if present. Full-time monitoring is recommended starting at a depth of five feet below the surface during earth disturbance activities, as required by the City of Perris and the PVCCSP.

Compliance with mitigation measure MM 7-1, which is an updated version of PVCCSP EIR mitigation measure MM Cult 5 is incorporated into the Project, and would ensure that potential impacts to paleontological resources, if present, are less than significant. Mitigation measure MM 7-1 requires monitoring during grading activities. The role of the monitor and salvage and resource recovery measures that must be implemented if paleontological resources are found are also identified.

ADDITIONAL MITIGATION MEASURES

Mitigation measure MM 7-1 below implements PVCCSP EIR mitigation measure MM Cultural 5, as subsequently revised by the City of Perris.

MM 7-1 Prior to the issuance of grading permits, the Project Applicant shall submit to and receive approval from the City, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The PRIMMP shall include the provision of a qualified professional paleontologist (or his or her trained paleontological monitor representative) during onsite and offsite subsurface excavation that exceeds five (5) feet in depth below the pre-grade surface. Selection of the paleontologist shall be subject to approval of the City of Perris Planning Manager and no grading activities shall occur at the site or within offsite Project improvement areas until the paleontologist has been approved by the City.

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

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

A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered specimens. The report and inventory,

when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontological resources.

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

The following section is based on the Harley Knox Commerce Center Greenhouse Gas Analysis, City of Perris (GHG Analysis), prepared by Urban Crossroads (Urban Crossroads, 2022d), which is included in its entirety in Appendix H of this Initial Study and summarized herein.[11]

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the Earth with respect to temperature, precipitation, and storms. Debate exists about whether or not GCC is occurring naturally or as a result of human activity. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the Earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases, which are further described, along with health effects, in Section 2.3 of the GHG Analysis included in Appendix H of this Initial Study. The majority of scientists believe that this increased rate of climate change is the result of GHGs due to human activity and industrialization over the past 200 years. The effects of climate change in California related to public health, water resources, agriculture, forests and landscapes, rising sea levels, and human health are described in Section 2.6 of the GHG Analysis included in Appendix H.

An individual project like the Project cannot generate enough GHG emissions to cause a discernible change in global climate. However, the Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which, when taken together, constitute potential influences on GCC. GHG emission inventories from 2018 are presented in Table 2-3 of the GHG Analysis included in Appendix H of this Initial Study. The United States, as a single country, was the number two producer of GHG emissions in 2018.

The CARB compiles GHG inventories for the State of California. Based upon the 2020 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2019 greenhouse gas emissions inventory, California emitted 418.1 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) or 418,100 Gg CO_2e (6.26 percent of the total United States GHG emissions).

[11] At the time the Greenhouse Gas Analysis was prepared, the Project was proposed to consist of a 156,780-sf building compared to the currently proposed 156,094-sf building (a difference of 686 sf). Therefore, the analysis is conservative as it is based development of a slightly larger building.

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

There are no PVCCSP Standards and Guidelines specifically related to GHG emissions included in the PVCCSP. However, PVCCSP EIR mitigation measures MM Air 4, MM Air 5, MM Air 6, MM Air 11, MM Air 13, MM Air 14, MM Air 19, and MM Air 20 presented in the Air Quality section of this Initial Study, which are applicable to the Project would serve to reduce GHG emissions. However, as a conservative measure, the emissions presented in the Project's GHG Analysis do not reflect implementation of these mitigation measures.

EXPLANATION OF CHECKLIST ANSWERS

8a. **Less Than Significant Impact.** The City of Perris does not have an adopted threshold of significance for GHG emissions. For CEQA purposes, the City has discretion to select an appropriate significance criterion, based on substantial evidence. Accordingly, the South Coast Air Quality Management District's (SCAQMD's) adopted numerical threshold of 10,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year for industrial stationary source emissions has been applied because the Project is analogous to an industrial use much more closely than any other land use such as commercial or residential in terms of its expected operating characteristics. In addition to the City of Perris, 10,000 $MTCO_2e$ has been used as the significance threshold by many other local government lead agencies for logistics projects throughout the SCAB, since the SCAQMD adopted this threshold for its own use. Further, to ensure that the threshold is conservative in its application, although the SCAQMD uses their adopted 10,000 $MTCO_2e$ threshold to determine the significance of stationary source emissions for industrial projects, the 10,000 $MTCO_2e$ threshold is applied to all sources of Project-related GHG emissions, whether stationary, mobile, area, or other source.

Use of this threshold is also consistent with guidance provided in the California Air Pollution Control Officers Association (CAPCOA) *CEQA and Climate Change* handbook; as such, the City has opted to use a non-zero threshold approach based on Approach 2 of the handbook. Threshold 2.5 (Unit-Based Thresholds Based on Market Capture) establishes a numerical threshold based on the capture of approximately 90 percent of emissions from future development. The latest threshold developed by the SCAQMD using this method is 10,000 $MTCO_2e$ per year for industrial projects. This threshold is based on the review of 711 CEQA Projects.

In May 2021, the SCAQMD, in conjunction with the CAPCOA and other California air districts, released the latest version of the California Emissions Estimator Model™ (CalEEMod v2020.4.0. The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for the Project to determine construction and operational air quality emissions. Output from the model runs for both construction and operational activity are included in the GHG Analysis provided in Appendix H of this Initial Study. The methods and assumptions used to calculate the Project's GHG emissions are also described in detail in the GHG Analysis included in Appendix H.

Construction

Construction activities associated with the Project are described in Section 2.2.5 of this Initial Study. For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the

Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life, then adding that number to the annual operational phase GHG emissions. As such, construction emissions from the Project (approximately 824.44 $MTCO_2e$) were amortized over a 30-year period (estimated to be 27.48 $MTCO_2e$ per year) and added to the annual operational phase GHG emissions (refer to Table 3-3 of the GHG Analysis for a breakdown of GHG emissions).

Operations

Operational activities associated with the Project would result in emissions of CO_2, CH_4, and N_2O from the following primary sources, which are described in detail in Section 3.6 of the GHG Analysis included in Appendix H: area source emissions; energy source emissions; mobile source emissions; onsite cargo handling equipment emissions; solid waste; and water supply, treatment, and distribution.

As shown in Table 3-7, the Project would result in approximately 402.02 $MTCO_2e$ per year from construction, area, energy, waste, and water usage. In addition, the Project has the potential to result in an additional 1,181.72 $MTCO_2e$ per year from mobile sources if the assumption is made that all of the vehicle trips to and from the Project are "new" trips resulting from Project development; the Project's trip generation and other assumptions related to mobile emissions are further discussed in the GHG Analysis included in Appendix H. Pursuant to Section 5.106.5.3.2 of the CALGreen Code, seven parking spaces would provide conduits for the charging of EVs; however, the Project GHG emissions analysis conservatively assumes that four EV spaces would be provided. In the event that four EV parking spaces are installed, this would result in an additional seven $MTCO_2e$/yr to the Project's total GHG emissions. In order to determine the estimated benefit from installation of the four EV charging stations, GHG emissions associated with gasoline/diesel vehicles were calculated. Annual VMT reduction from the EV charging stations is approximately 112,896 miles per year. Gasoline/diesel vehicles traveling the 112,896 miles per year would generate approximately 33 $MTCO_2e$/yr. As such, installation of the four EV parking stations would result in an emissions reduction of 28 $MTCO_2e$/yr, which would be a decrease in GHG emission associated with the Project and an overall decrease in fossil fuels.

The Project has the potential to generate a total of approximately 1,770.59 $MTCO_2e$ per year. As such, the Project would not exceed the SCAQMD's numeric threshold of 10,000 $MTCO_2e$. Thus, Project-related emissions would not have a significant direct or indirect impact on GHG and climate change.

Therefore, impacts associated with GHG emissions would be less than significant and no mitigation is required.

8b. **Less than Significant Impact.** The GHG Analysis included in Appendix H includes a detailed discussion of international, federal, State, and regional plans, policies, and regulations addressing the reduction of GHG emissions. Further, the GHG Analysis identifies mandates imposed by the State and the SCAQMD aimed at the reduction of air quality emissions, including those that would also assist in the reduction of GHG emissions.

TABLE 3-7 ESTIMATED TOTAL ANNUAL GREENHOUSE GAS EMISSIONS

Emission Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Annual construction-related emissions amortized over 30 years	27.17	0.01	0.00	27.48
Area Source	0.01	3.00E-05	0.00	0.01
Energy Source	85.96	4.99E-03	6.70E-04	86.29
Mobile Source	1,343.22	0.02	0.18	1,396.57
On-Site Equipment	50.79	0.02	0.00	51.20
Waste	29.93	1.77	0.00	74.15
Water Usage	124.61	1.19	0.03	162.89
Reductions from EV Charging Stations	*-28*			
Total CO_2e (All Sources)	**1,770.59**			

Source: (Urban Crossroads, 2022d, Table 3-8)

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation such as the AB 32 California Global Warming Solutions Act of 2006 was specifically enacted to address GHG emissions. Other legislation such as Title 24 and Title 20 energy standards were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions.

Pursuant to Section 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. As such, the Project's consistency with SB 32 (CARB 2017 Scoping Plan) and the City of Perris CAP is discussed below.

State Regulations

Assembly Bill 32

The California State Legislature enacted AB 32, which requires that GHGs emitted in California be reduced to 1990 levels by the year 2020 (this goal has been met). GHGs as defined under AB 32 include CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6. Since AB 52 was enacted, a seventh chemical, NF_3, has also been added to the list of GHGs. CARB is the state agency charged with monitoring and regulating sources of GHGs. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 states the following:

> "Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems."

Senate Bill 32 and 2017 Climate Change Scoping Plan Update

In November 2017, the CARB released the final 2017 Scoping Plan Update, which identifies the State's post-2020 reduction strategy. The 2017 Scoping Plan Update

reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce methane emissions from agricultural and other wastes.

The 2017 Scoping Plan establishes a new emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

California's climate strategy will require contributions from all sectors of the economy, including the land base, and will include enhanced focus on zero- and near-zero-emission (ZE/NZE) vehicle technologies; continued investment in renewables, including solar roofs, wind, and other distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (methane, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for direct GHG reductions at refineries will further support air quality co-benefits in neighborhoods, including in disadvantaged communities historically located adjacent to these large stationary sources, as well as efforts with California's local air pollution control and air quality management districts (air districts) to tighten emission limits on a broad spectrum of industrial sources. Major elements of the 2017 Scoping Plan framework are discussed in the consistency analysis below.

In addition to the statewide strategies, the 2017 Scoping Plan also identifies local governments as essential partners in achieving the State's long-term GHG reduction goals and identifies local actions to reduce GHG emissions. As part of the recommended actions, the CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 $MTCO_2e$ or less per capita by 2030 and 2 $MTCO_2e$ or less per capita by 2050. For CEQA projects, the CARB states that lead agencies may develop evidenced-based bright-line numeric thresholds—consistent with the Scoping Plan and the State's long-term GHG goals—and projects with emissions over that amount may be required to incorporate onsite design features and mitigation measures that avoid or minimize project emissions to the degree feasible; or, a performance-based metric using a climate action plan or other plan to reduce GHG emissions as appropriate.

According to research conducted by the Lawrence Berkeley National Laboratory and supported by the CARB, California, under its existing and proposed GHG reduction policies, is on track to meet the 2020 reduction targets under AB 32 and could achieve the 2030 goals under SB 32.

Project Consistency Analysis

The 2017 Scoping Plan reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. It should be noted that the Project's consistency with the 2017 Scoping Plan also satisfies consistency with AB 32 since the 2017 Scoping Plan is based on the overall targets established by AB 32. Table 3-8 summarizes the Project's consistency with the 2017 Scoping Plan. As shown, the Project would not conflict with any of the 2017 Scoping Plan elements as any regulations adopted would apply directly or indirectly to the Project. Further, recent

studies show that the State's existing and proposed regulatory framework would allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030.

TABLE 3-8 2017 SCOPING PLAN CONSISTENCY SUMMARY

Action	Responsible Parties	Consistency
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.	CPUC, CEC, CARB	**Consistent.** The Project would use energy from Southern California Edison (SCE). SCE has committed to diversify the portfolio of energy sources by increasing energy from wind and solar sources. The Project would not interfere with or obstruct SCE energy source diversification efforts.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.		**Consistent.** The Project would be constructed in compliance with current California Building Code requirements. Specifically, new buildings must achieve compliance with 2019 Building and Energy Efficiency Standards and the 2019 California Green Building Standards requirements. The Project includes energy efficient lighting and fixtures that meet the current Title 24 Standards throughout the Project Site and would be a modern development with energy efficient heaters and air conditioning systems.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.		
Implement Mobile Source Strategy (Cleaner Technology and Fuels)		
At least 1.5 million zero emission and plug-in hybrid light-duty EVs by 2025.	CARB, California State Transportation Agency (CalSTA), Strategic Growth Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies	**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2025 targets. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and would therefore comply with the strategy.
At least 4.2 million zero emission and plug-in hybrid light-duty EVs by 2030.		**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2030 targets. As this is a CARB enforced standard, vehicles that access the Project are required to

TABLE 3-8 2017 SCOPING PLAN CONSISTENCY SUMMARY

Action	Responsible Parties	Consistency
		comply with the standards and would therefore comply with the strategy.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.		**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and would therefore comply with the strategy.
Medium- and Heavy-Duty GHG Phase 2.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to implement Medium- and Heavy-Duty GHG Phase 2. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and would therefore comply with the strategy.
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO_X standard.		**Not applicable.** This measure is not within the purview of this Project.
Last Mile Delivery: New regulation that would result in the use of low NO_X or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve last mile delivery emissions.
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in		**Consistent.** This Project would not obstruct or interfere with implementation of SB 375 and would therefore not conflict with this measure.

TABLE 3-8 2017 SCOPING PLAN CONSISTENCY SUMMARY

Action	Responsible Parties	Consistency
the document "Potential VMT Reduction Strategies for Discussion."		
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	**Consistent.** This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to improve last mile delivery emissions.
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GO-Biz), California Infrastructure and Economic Development Bank (IBank), Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	**Consistent.** Although this is directed towards CARB and Caltrans, the Project would be designed to promote and support pedestrian activity onsite and in the Project site area through the implementation of onsite pedestrian pathways and sidewalks along Harley Knox Boulevard and Nance Street.
By 2019, develop pricing policies to support low-GHG transportation (e.g., low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	**Not applicable.** This measure is not within the purview of this Project.
Implement California Sustainable Freight Action Plan		
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB, Caltrans, CEC, GO-Biz	**Consistent.** This measure would apply to all trucks accessing the Project site, this may include existing trucks or new trucks that are part of the statewide goods movement sector.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.		**Not applicable.** This measure is not within the purview of this Project.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.		**Consistent.** When adopted, this measure would apply to all fuel

TABLE 3-8 2017 SCOPING PLAN CONSISTENCY SUMMARY

Action	Responsible Parties	Consistency
	CARB	purchased and used by the Project in the state. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.
Implement the Short-Lived Climate Pollutant Strategy (SLPS) by 2030		
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, California State Water Resource Control Board (SWRCB), Local Air Districts	**Consistent.** The Project would be required to comply with this measure and reduce any Project-source SLPS emissions accordingly. The Project would not obstruct or interfere agency efforts to reduce SLPS emissions.
50% reduction in black carbon emissions below 2013 levels.		**Not applicable.** This measure is not within the purview of this Project.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local Air Districts	**Not applicable.** This measure is not within the purview of this Project.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	**Consistent.** The Project would be required to comply with any applicable Cap-and-Trade Program provisions. The Project would not obstruct or interfere agency efforts to implement the post-2020 Cap-and-Trade Program.
By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink		
Protect land from conversion through conservation easements and other incentives.	CNRA, Departments Within CDFA, CalEPA, CARB	**Not applicable.** This measure is not within the purview of this Project. However, the Project site is not an identified property that needs to be conserved.
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.		**Consistent.** The Project site is vacant disturbed property with a limited number of trees and does not comprise an area that would effectively provide for substantive carbon sequestration. The Project would not obstruct or interfere agency efforts to increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.		**Consistent.** To the extent appropriate for the proposed industrial buildings, wood products would be used in construction, including for the roof

TABLE 3-8 2017 SCOPING PLAN CONSISTENCY SUMMARY

Action	Responsible Parties	Consistency
		structure. Additionally, the Project includes landscaping.
Establish scenario projections to serve as the foundation for the Implementation Plan.		**Not applicable.** This measure is not within the purview of this Project.
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	**Not applicable.** This measure is not within the purview of this Project.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	**Not applicable.** This measure is not within the purview of this Project.

Source: (Urban Crossroads, 2022d)

Title 24 Energy Efficiency Standards and California Green Building Standards

As previously discussed in the Energy section of this Initial Study, California Code of Regulations Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The 2019 version of Title 24 was adopted by the CEC and became effective on January 1, 2020 and is therefore applicable to the Project.

California Code of Regulations, Title 24, Part 11: California Green Building Standards (CALGreen) Code is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the California Building Standards Commission (CBSC). CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2019 California Green Building Code Standards that became effective January 1, 2020. Local jurisdictions are permitted to adopt more stringent requirements, as state law provides methods for local enhancements. CALGreen recognizes that many jurisdictions have developed existing construction and demolition ordinances and defers to them as the ruling guidance provided they establish a minimum 65 percent diversion requirement. The code also provides exemptions for areas not served by construction and demolition recycling infrastructure. The State Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy, which is generally enforced by the local building official.

Below are the 2019 California Green Building Code Standards that apply to the Project:

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- Designated parking for clean air vehicles. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- Electric vehicle (EV) charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106. 5.3.3 (5.106.5.3).
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1. 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
    - Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
    - Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).

  - Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
  - Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).

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

Project Consistency Analysis

The Project would be required to comply with applicable provisions of Title 24 Energy Efficiency Standards and California Green Building Standards. As previously identified, the State Building Code provides the minimum standard that buildings must meet in order to be certified for occupancy, and adherence to these requirements is confirmed by the City during the respective Project approvals.

City of Perris Climate Action Plan

The City of Perris Climate Action Plan (CAP) was adopted by the City Council (Resolution Number 4966) on February 23, 2016. The CAP was developed to address GCC through the reduction of harmful GHG emissions at the community level, and as part of California's mandated statewide GHG emissions reduction goals under AB 32. Perris' CAP, including the GHG inventories and forecasts contained within, is based on Western Riverside Council of Government's (WRCOG) Subregional CAP. The Perris CAP utilized WRCOG's analysis of existing GHG reduction programs and policies that have already been implemented in the subregion and applicable best

practices from other regions to assist in meeting the 2020 subregional reduction target. The CAP reduction measures chosen for the City's CAP were based on their GHG reduction potential, cost-benefit characteristics, funding availability, and feasibility of implementation in the City of Perris. The CAP used an inventory base year of 2010 and included emissions from the following sectors: residential energy, commercial/industrial energy, transportation, waste, and wastewater. The CAP's 2020 reduction target is 15 percent below 2010 levels, and the 2035 reduction target is 47.5 percent below 2010 levels. The City of Perris is expected to meet these reduction targets through implementation of Statewide and local measures. Beyond 2020, Executive Order S-03-05 calls for a reduction of GHG emissions to a level 80 percent below 1990 levels by 2050.

Local measures incorporated in the CAP include:

- An energy measure that directs the City to create an energy action plan to reduce energy consumption citywide.
- Land use and transportation measures that encourage alternative modes of transportation (walking, biking, and transit), reduce motor vehicle use by allowing a reduction in parking supply, voluntary transportation demand management to reduce vehicle miles traveled, and land use strategies that improve jobs-housing balance (increased density and mixed-use)
- Solid waste measures that reduce landfilled solid waste in the City

Project Consistency Analysis

The Project would comply with the CAP through compliance with the PVCCSP EIR mitigation measures, which would lessen the Project's contribution of GHG emissions from both construction and operation. The Project would not conflict with local strategies and state/regional strategies listed in the Perris CAP. Further, the Project is subject to California Building Code requirements. New buildings must achieve the 2019 Building and Energy Efficiency Standards and the 2019 California Green Building Standards requirements, which include energy conservation measures and solid waste reduction measures. While the Project does not include reduced parking, increased density, or a mixed-use development, it would provide sidewalks, bike racks, pedestrian walkways, and measures to encourage the use of alternative modes of transportation (walking, biking, and transit). As such, the Project would not conflict with applicable GHG reduction measures in the CAP and a less than significant impact is expected to occur.

9. HAZARDS/HAZARDOUS MATERIALS	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter-mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise 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?	☐	☐	☐	☒

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

Airport Overlay Zone (from Chapter 12.0 of the PVCCSP)

12.1 Airport Overlay Zones and Delineation. This section defines specific land uses and land use densities as distinguished by various MARB/IP Airport safety zones within the PVCCSP area: M (Military), A (Clear Zone), B1 (Inner Approach Departure Zone), B2 (High Noise Zone), C1 (Primary Approach/Departure Zone), C2 (Flight Corridor Zone), D (Flight Corridor Buffer), and E (Other Airport Environs).

12.1.3 Compatibility with March ARB/IP ALUCP

The PVCC is located in the MARB/IPA safety zones; therefore, all development within the Specific Plan area shall comply with the following measures:

- Noise Standard
- Land Use and Activities
- Retention and Water Quality Basins
- Notice of Airport in the Vicinity
- Lighting Plans
- Height Restrictions per *Federal Aviation Regulations* Part 77
- Form 7460 (Notice of Proposed Construction or Alteration)
- Infill

Section 4.2.1, General Onsite Project Development Standards and Guidelines, of the PVCCSP, also prohibits uses that could affect the MARB/IPA consistent with the development Standards and Guidelines for Airport Overlay Zones in Section 12 of the PVCCSP.

The PVCCSP EIR includes mitigation measures for potential impacts related to hazards and hazardous materials. Applicable mitigation measures incorporated into the Project are identified below and are assumed in the analysis presented in this section. Modifications to certain mitigation measures have been made to clarify the requirement.

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

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

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

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

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

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

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

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

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

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

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

PVCCSP MM Haz 7 *Prior to any excavation or soil removal action on a known contaminated site, or if contaminated soil or groundwater (i.e., with a visible sheen or detectable odor) is encountered, complete characterization of the soil and/or groundwater shall be conducted. Appropriate sampling shall be conducted prior to disposal of the excavated soil. If the soil is contaminated, it shall be properly disposed of, according to Land Disposal restrictions. If site remediation involves the removal of contamination, then contaminated material will need to be transported off site to a licensed hazardous waste disposal facility. If any implementing development projects require imported soils, proper sampling shall be conducted to make sure that the imported soil is free of contamination.*

EXPLANATION OF CHECKLIST ANSWERS

The PVCCSP EIR (Section 4.6, Hazards and Hazardous Materials) cites the following related regulations applicable to the analysis of hazards and hazardous materials: (1) State and federal agencies and associated databases that regulate hazardous materials and (2) State and Federal Aviation Administration (FAA) airspace protection and land use compatibility regulations. In addition, applicable goals, policies, and measures from the Safety Element of the City of Perris General Plan related to hazards and hazardous materials are provided in the PVCCSP EIR. The discussion of related regulations from the PVCCSP EIR is incorporated by reference.

9a. **Less Than Significant Impact.** As identified in Section 4.6 of the PVCCSP EIR, new commercial and industrial uses in the Specific Plan area could involve the transport, use, storage, and disposal of hazardous materials. However, with required compliance with federal, State, and City regulations, standards, and guidelines pertaining to hazardous materials management, proposed commercial and industrial developments would not create a significant hazard to the public or the environment through routine use, storage, or disposal of hazardous materials; the impact was determined to be less than significant.

Impact Analysis for Temporary Construction Activities

Heavy equipment (e.g., dozers, excavators) would operate on the Project site during construction. Heavy equipment is typically fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the EPA, California Department of Toxic Substances Control (DTSC), SCAQMD, and RWQCB. With mandatory compliance to applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Impacts would be less than significant.

Impact Analysis for Long-Term Operational Activities

Operation of the proposed industrial warehouse building would involve the use of materials common to all urban development that are labeled hazardous (e.g., solvents and commercial cleansers; petroleum products; and pesticides, fertilizers, and other landscape maintenance materials). There is the potential for routine use, storage, or transport of other hazardous materials; however, the precise materials are not known, as the tenants of the proposed warehouse are not yet defined. In the event that hazardous materials, other than those common materials described above, are associated with future warehouse operations, the hazardous materials would only be stored and transported to and from the site. Manufacturing and other chemical processing would not occur and are not allowed with the proposed warehouse uses.

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

Consistent with the conclusion of the PVCCSP EIR, with compliance with applicable regulations, operation of the Project would result in a less than significant impact related to a significant risk to the public or the environment through the potential routine transport, use, or disposal of hazardous materials. No mitigation is required.

9b. **Less Than Significant with Mitigation Incorporated.** As identified in Section 4.6 of the PVCCSP EIR, the handling and transport of hazardous materials can result in accidental releases. However, with required compliance with federal, State, and City regulations, standards, and guidelines pertaining to hazardous materials management, proposed commercial and industrial developments would not create a significant hazard to the public or the environment from accident conditions related to the routine transport, use, or storage of hazardous materials. The impact was determined to be less than significant.

Two reports have been prepared by Hazard Management Consulting, Inc. (HMC) for the Project site: 1) Phase I Environmental Site Assessment, 280 and 25264 East Nance Street and Assessor's Parcel Numbers: 302-100-031 Perris, California 92571 (Phase I ESA) (May 16, 2021) (HMC, 2021a); and 2) Limited Soils Investigation Report 280 and 25264 E Nance Street and APN 302100031 Perris, California 92571 (Limited Soils Investigation) (June 17, 2021) (HMC, 2021b). The reports are included in Appendix I1 and Appendix I2, respectively, of this Initial Study, and are summarized herein. The Phase I ESA was prepared in accordance with ASTM International E 1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process and the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (AAI) (40 Code of Federal Regulations Part 312). The objective of a Phase I ESA is to identify, to the extent feasible pursuant to ASTM Standard E 1527-13, recognized environmental conditions (RECs)[12]. The methods for preparing the Phase I ESA are outlined in Section 1.2 of the Phase I ESA.

[12] RECs are defined by ASTM as "the presence or likely presence of any hazardous substance or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property."

The Phase I ESA did not identify any RECs, Controlled Recognized Environmental Conditions (CRECs), or Historical Recognized Environmental Conditions (HRECs) on the Project site. Further, no concerns were noted on the adjacent properties during the site reconnaissance conducted by HMC for the Phase I ESA.

Although not identified as a REC, the Phase I ESA did identify historic agricultural uses at the Project site. Therefore, a Limited Soils Investigation was conducted to assess whether a release of hazardous substances has occurred at the Project site. Soil samples were collected on May 19, 2021, from nine locations and analyzed for organochlorine pesticides. Soil samples were compared to State and Federal screening levels to assess whether detectable concentrations would present a possible human health risk to construction workers and future occupants or the environment. Laboratory analyses were compared to the California Department of Toxic Substances Control (DTSC) Soil Screening Levels for industrial/commercial land use (DTSC-SLi), the EPA Region 9, Regional Screening Levels for industrial/commercial land use (EPA-RSLi), and the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) Environmental Screening Levels for industrial direct exposure human health risk levels (SFBRWQCB-ESLi). Additional information about the soils sampling and analysis is provided in the Limited Soils Investigation included in Appendix I2 of this Initial Study. The results of the Limited Soils Investigation generally reported undetectable to minor concentrations of organochlorine pesticides. Although low residual pesticide concentrations were reported, none of the detections exceeded regulatory screening levels. Based on the results of this investigation, there has been no evidence that pesticide concentrations reported at the Site pose a threat to human health or the environment and no further investigation into pesticides in soil is warranted at the Project site.

Accidents involving hazardous materials that could pose a significant hazard to the public or the environment would be highly unlikely during the construction and long-term operation of the Project and are not reasonably foreseeable. As discussed above under Threshold 9a, the transport, use, and handling of hazardous materials on the Project site during construction is a standard risk on all construction sites, and there would be no greater risk for upset and accidents than would occur on any other similar construction site. In the unlikely event that unknown contaminated soils are encountered during earth-moving activities, PVCCSP EIR mitigation measure MM Haz 7 would be implemented and would fully address the presence of contaminated soil through appropriate sampling and testing, disposal, and/or remediation. Upon buildout, the Project would operate as a warehouse facility. Based on the operational characteristics of warehouse distribution and light industrial centers, it is possible that hazardous materials could be used during the course of a future occupant's routine, daily operations; however, as discussed above under Threshold 9a, the Project would be required to comply with all applicable local, State, and federal regulations related to the transport, handling, and usage of hazardous material. Accordingly, impacts associated with the accidental release of hazardous materials would be less than significant during both construction and long-term operation of the Project. No additional mitigation in required.

9c. **No Impact.** Val Verde High School, located at 972 Morgan Street, in the City of Perris, is identified in the PVCCSP Initial Study and PVCCSP EIR as within the Specific Plan boundary and a school of concern for potential hazardous materials emissions. Val Verde High School is located approximately 1.8 miles southwest of the Project site. Additionally, no schools are located along truck routes that would be used for the Project. The school closest to the Project site is Rancho Verde High School, located

at 17750 Lasselle Street and approximately 0.7-mile northeast of the Project site. No impact related to emissions of hazardous materials within one-quarter mile of a school would occur with implementation of the Project and no mitigation is required.

9d. **No Impact.** Based on the Phase I ESA, and review of the California Environmental Protection Agency (CalEPA) Cortese List Data Resources (DTSC, 2021), the Project site is not located on any list of hazardous materials sites compiled pursuant to Government Code § 659625. Accordingly, no impact would occur and no mitigation is required.

9e. **Less Than Significant with Mitigation Incorporated.** The Project site is located approximately 1.5 miles southeast of the MARB/IPA Airport and is subject to the MARB/IPA ALUCP adopted by the Riverside County Airport Land Use Commission (ALUC) in November 2014 (RCALUC, 2014). The MARB/IPA ALUCP divides the area close to the airport into zones based on proximity to the airport and perceived risks. The Project site is within Zone D, as shown in Map MA-1, Compatibility Map, in the MARB/IPA ALUCP. Neither density nor intensity are restricted for this zone, and avigation easements are not required; however, hazards to flight including physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations are prohibited.

According to Table MA-1, Compatibility Zone Factors, of the MARB/IPA ALUCP, the risk level associated with Zone D is low since it is on the periphery of flight corridors (RCALUC, 2014). Therefore, the Project would not result in a safety hazard or people residing or working in the Project area. However, the landowner shall convey an avigation easement to the MARB/March Inland Port Airport Authority as required by PVCCSP EIR mitigation measure MM Haz 2.

The Project site is within the Federal Aviation Regulations Part 77 (FAA 2017) Civilian Surface area (refer to Map MA-2, Airspace Protection Surfaces, of the MARB/IPA ALUCP), and specifically within the Civilian 20:1 Conical Surface that extends up to an elevation of 1,685 feet amsl over the site. The Project Applicant proposes a maximum 43 feet 2-inch-high industrial warehouse building with a maximum building elevation of approximately 1,503 feet amsl based on a pad elevation of 1,457.3 feet amsl. Therefore, the proposed building would not extend into the Airspace Protection Surfaces for MARB/IPA.

The proposed structure would also not be over 200 feet above the ground level and would not exceed the 100:1 conical surface from any point on the runway of MARB/IPA. As such, the Project would not require notification of the FAA pursuant to Part 77 of the Federal Aviation Regulations (FAA, 2020). Also, construction equipment (i.e., crane) at the site would not encroach into the imaginary surface that would require FAA notification. Therefore, the Project has complied with PVCCSP EIR mitigation measure MM Haz 6.

Consistent with mitigation measure MM Haz 5, which outlines prohibited uses, the proposed warehouse use would not involve an electromagnetic radiation component; steady of flashing lights that would be directed toward aircraft; conflict with MARB/IPA operations or radio communications (e.g., microwave transmission in conjunction with a cellular tower, radio wave transmission in conjunction with remote equipment); cause sunlight to be directed toward an aircraft; or, generate conditions that would affect safe air navigation, including water quality basins that retain water for more than 48 hours after a rainfall event. Further, mitigation measure MM Haz 3 requires that outdoor

lighting be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane, and mitigation measure MM Haz 4 requires that all potential purchasers and tenants be notified that the property is located in the vicinity of an airport, within an AIA. The Project is required to comply with PVCCSP MM Haz 3 through PVCCSP MM Haz 5 and with incorporation of these mitigation measures, the Project would result in a less than significant impact due to proximity to the MARB/IPA. No additional mitigation is required.

9f. **Less Than Significant Impact.** The City of Perris participates in the County of Riverside Multi-Jurisdictional Local Hazard Mitigation Plan (MHMP), which outlines requirements for emergency access and standards for emergency responses (County of Riverside EMD, 2018). The PVCCSP EIR Initial Study (Section 9, Hazards and Hazardous Materials) concluded that because emergency access would be maintained and improved throughout the PVCCSP area in accordance with the MHMP, development within the PVCCSP would not interfere with adopted emergency response plans.

Harley Knox Boulevard, which forms the northern boundary of the Project site, is constructed to its ultimate width; however, implementation of the Project would include roadway improvements along Nance Street consistent with the requirements of the PVCCSP. Emergency access to the Project would be provided via driveways along Harley Knox Boulevard and Nance Street. Implementation of the circulation system pursuant to the PVCCSP would improve emergency access to the site and the area. Accordingly, operation of the Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan. This impact would be less than significant and no mitigation is required.

9g. **No Impact.** As identified in the PVCCSP EIR Initial Study (Section 9, Hazards and Hazardous Materials), the Specific Plan area, including the Project site, is not adjacent to any wildlands or undeveloped hillsides where wildland fires would be expected to occur, and the City's General Plan does not designate the Specific Plan area as being at risk from wildfires (City of Perris, 2016, Exhibit S-16). The Project site would not be susceptible to wildfires, and there would be no impact.

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

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

4.2 Onsite Standards and Guidelines

4.2.2 Site Layout for Commerce Zones

4.2.2.7 Water Quality Site Design

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

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

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

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

- Infiltration basins
- Infiltration trenches
- Permeable pavement
- Harvest and reuse
- Bioretention facilities
- Extended detention basins
- Sand filter basins

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

- Optimize the site layout
- Preserve existing drainage patterns
- Protect existing vegetation and sensitive areas
- Preserve natural infiltration capacity
- Minimize impervious area
- Disperse runoff to adjacent pervious areas
- Delineate drainage management areas
- Classify and tabulate Drainage Management Areas (DMAs) and determine runoff factors for

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

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

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

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

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

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

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

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

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

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

Covered Trash Enclosures. Trash enclosure covers must be provided.

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

8.2 Industrial Development Standards and Guidelines

8.2.1 Industrial Site Layout

8.2.1.8 Water Quality Site Design

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

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

EXPLANATION OF CHECKLIST ANSWERS

The PVCCSP EIR concludes that development of planned uses under the PVCCSP would result in increased stormwater flows in the Specific Plan area. However, with implementation of site-specific WQMPs and the construction of on- and offsite storm drain facilities, impacts to the natural drainage pattern would not result in substantial erosion or siltation. Additionally, the PVCCSP EIR Initial Study concludes that, because individual projects would be required to comply with applicable federal, State, and local water quality regulations, impacts to water quality would be less than significant. The discussion of related regulations from the PVCCSP EIR is incorporated by reference.

10a. **Less Than Significant Impact.** Construction and operation of the Project would generate pollutants that may impact stormwater quality. The Santa Ana RWQCB sets water quality standards for all ground and surface waters within the Project's region. Water quality standards are defined under the Clean Water Act to include both the beneficial uses of specific water bodies and the levels of water quality that must be met and maintained to protect those uses (water quality objectives). The Project site is located within the Santa Ana Watershed and San Jacinto Sub-Watershed. Runoff from the PVCCSP area discharges into the Perris Valley Storm Drain, which in turn connects to Reach 3 of the San Jacinto River. Reach 3 becomes Reach 2 and then Reach 1 of the San Jacinto River and eventually discharges into Lake Elsinore. Overflows from Lake Elsinore go into Temescal Creek and ultimately to the Santa Ana River. Under Section 303(d) of the Clean Water Act, Reach 2 of the San Jacinto River (or Canyon Lake) is considered an impaired water body for nutrients and pathogens; Lake Elsinore is also an impaired water body for nutrients, organic enrichment/low dissolved oxygen, and indicator bacteria.

Construction Impacts

Construction-related activities have the potential to result in impacts to water quality due to grading activities that would potentially cause erosion and sedimentation in runoff. Sediments also transport substances such as nutrients, hydrocarbons, and trace metals, which would be conveyed to the storm drain facilities and receiving waters. Substances such as fuels, oil and grease, solvents, paints and other building construction materials, wash water, and dust control water could also enter storm runoff and be transported to nearby waterways. This could potentially degrade the quality of the receiving waters and lead to the impairment of downstream water sources.

Because development of the Project site would involve grading of more than one acre, the Project proponent would be required to obtain coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (NPDES No. CAS000002, Water Quality Order No. 2009-009-DWQ,[13] or the latest approved Construction General Permit) and implement a Storm Water Pollution Prevention Plan (SWPPP) to reduce pollutants in the stormwater to the maximum extent practicable during construction. The SWPPP must include erosion-control and sediment-control BMPs that would meet or exceed measures required by the determined risk level of the construction site, in addition to tracking control, waste management, and non-stormwater control BMPs that reduce the potential for construction-related stormwater pollutants. These measures may include the use of gravel bags, silt fences, straw wattles, hay bales, check dams, hydroseed, or soil binders. The construction contractor would be required to install, implement, and maintain these BMPs throughout the duration of onsite construction activities. A Construction Site Monitoring Program that identifies stormwater monitoring and sampling requirements during construction is a required component of the SWPPP. In addition, the construction contractor would be required to maintain an inspection log and allow the log-on site to be reviewed by the City and representatives of the RWQCB. Thus, compliance with the NPDES Construction General Permit and implementation of the required SWPPP would avoid the violation of water quality standards or waste discharge requirements, as well as avoid the degradation of water quality during construction. Impacts would be less than significant, and no mitigation is required.

Operational Impacts

To address post-construction erosion and pollutant discharge impacts to stormwater quality, a Project Specific Preliminary Water Quality Management Plan (WQMP) has been prepared by Thienes Engineering, Inc. (Thienes, 2021a) (December 1, 2021), in compliance with Ordinance No. 1194 of the City of Perris and the Riverside County MS4 Permit, under which the City of Perris is a co-permittee. The Preliminary WQMP is provided in Appendix J of this Initial Study and is summarized herein. The Project site is currently undeveloped and the majority of stormwater percolates into the ground. Under existing conditions, stormwater runoff sheet flows from north to south towards Nance Street.

The Project site is currently undeveloped with limited impervious area. The Project would result in approximately 5.7 acres (248,292 sf) of impervious surfaces, which represents an increase of 245,399 sf compared to existing condition (2,893 sf). The impervious areas would be associated with the proposed building, parking areas, truck yard, walkways, drive aisles, sidewalks, roadways, and other surfaces that would reduce ground percolation and increase stormwater runoff. Potential pollutants of concern that could be generated by long-term operation of the proposed industrial Project include bacterial indicators, metals, nutrients, pesticides, toxic organic compounds (solvents), trash and debris, and oil and grease. These pollutants may lead to the degradation of stormwater quality in downstream water bodies, including Canyon Lake and Lake Elsinore.

[13] NPDES No. CAS000002, Water Quality Order 2009-0009- DWQ, SWRCB NPDES General Permit for Storm Water Discharges Associated with Construction Activity (adopted by the SWRCB on September 2, 2009, and effective on July 1, 2010). This order was amended by 2010-0014-DWQ, which became effective on February 14, 2011, and 2012-0006-DWQ, which became effective on July 17, 2012. In accordance with the language set forth in Order No. 2009-0009-DWQ, this permit has been administratively extended indefinitely.

The Project site would primarily have two drainage management areas (DMA A and DMA B). As shown on Exhibit 12, stormwater from the western portion of the proposed building, the western truck yard, and the southwest and northwest parking lots (DMA A) would surface drain to several catch basins located within the western truck yard and then into the proposed underground infiltration chambers for water quality treatment. Runoff from the eastern portion of the building and the eastern parking lot (DMA B) would surface drain to two catch basins within the eastern parking lot and then into the proposed underground infiltration chambers. These systems would utilize infiltration as their primary form of treatment. These systems store stormwater runoff until it gradually exfiltrates into the underlying soil. Pollutant removal occurs through the infiltration of runoff and the adsorption of pollutants into the soil. This practice has high pollutant removal efficiency and can also help recharge groundwater. The landscaped areas along Nance Street and Harley Knox Boulevard (DMAs C and D, respectively) would surface drain offsite, and would be self-treating.

The required design capture volume (DCV) for water quality treatment would be addressed through the use of the infiltration chambers. Additionally, a number of permanent and operational source control BMPs are proposed and would include, but not be limited to, inlet markings, landscape design and pesticide use requirements, tenant information, trash enclosures, industrial process restrictions, uncovered loading docks, and site maintenance. The proposed BMPs would also serve to reduce pollutants in the runoff.

The Preliminary WQMP has been prepared in accordance with the requirements of the Riverside County MS4 Permit and the City of Perris, as well as the PVCCSP's Onsite and Industrial Standards and Guidelines for Water Quality Site Design. Future tenants of the Project would also have to comply with the NPDES Industrial General Permit or Project-specific Waste Discharge Requirements for any point source discharge associated with proposed activities within the warehouse building. Thus, no violation of water quality standards or waste discharge requirements or degradation of water quality during long-term operations would occur. Impacts related to water quality would be less than significant, and no mitigation is required.

10b. **Less Than Significant Impact.** The San Jacinto Groundwater Basin underlies the valleys of San Jacinto, Perris, Moreno Valley, and Menifee in western Riverside County. This basin is bound by the San Jacinto Mountains, San Timoteo Badlands, Box Mountains, Santa Rosa Hills and Bell Mountain, and unnamed hills. Based on water level measurements taken within the borings and the moisture contents of the recovered soil samples, the groundwater table is considered to have existed at a depth of 23 feet at the time of the subsurface exploration (NorCal Engineering, 2021).

Potable water service is provided to the City of Perris by the Eastern Municipal Water District (EMWD), which serves an approximately 555-square-mile area. The Urban Water Management Plan of the EMWD indicates that about half of its water supply consists of imported water purchased through Metropolitan Water District of Southern California from the State Water Project and the Colorado River Aqueduct, with local supplies including potable groundwater, desalinated groundwater, and recycled water (EMWD, 2021a). Groundwater is not being proposed to serve the Project as EMWD considers current groundwater production to be utilized exclusively by existing customers (EMWD, 2021a). Additionally, the Project would not involve direct withdrawals of groundwater. Therefore, groundwater would not be used to serve the Project and the Project would not have the potential to substantially decrease groundwater supplies.

Natural recharge to the San Jacinto groundwater basin is primarily from percolation of flows in the San Jacinto River and its tributary streams, with percolation of water stored in Lake Perris as an additional source of recharge. The Project site is not within a designated groundwater recharge area. Although implementation of the Project would reduce the pervious areas available for potential natural recharge, the area of the Project site is relatively small (approximately 6.4 net acres) in relation to the areal size of the groundwater basin (188,000 acres) (DWR, 2006), and the Project site's only source of water is from direct precipitation, providing little opportunity to recharge under existing conditions.

The Project would not deplete groundwater supplies or interfere with groundwater recharge. This impact would be less than significant, and no mitigation is required.

10c(i). **Less than Significant Impact.** No drainage courses are within the Project site; therefore, the Project would not alter the course of a stream or river. Additionally, the existing local drainage pattern across the Project site would be retained (from the north to south). As discussed below, construction activities have the potential to increase erosion; however, erosion potential post-construction would be reduced.

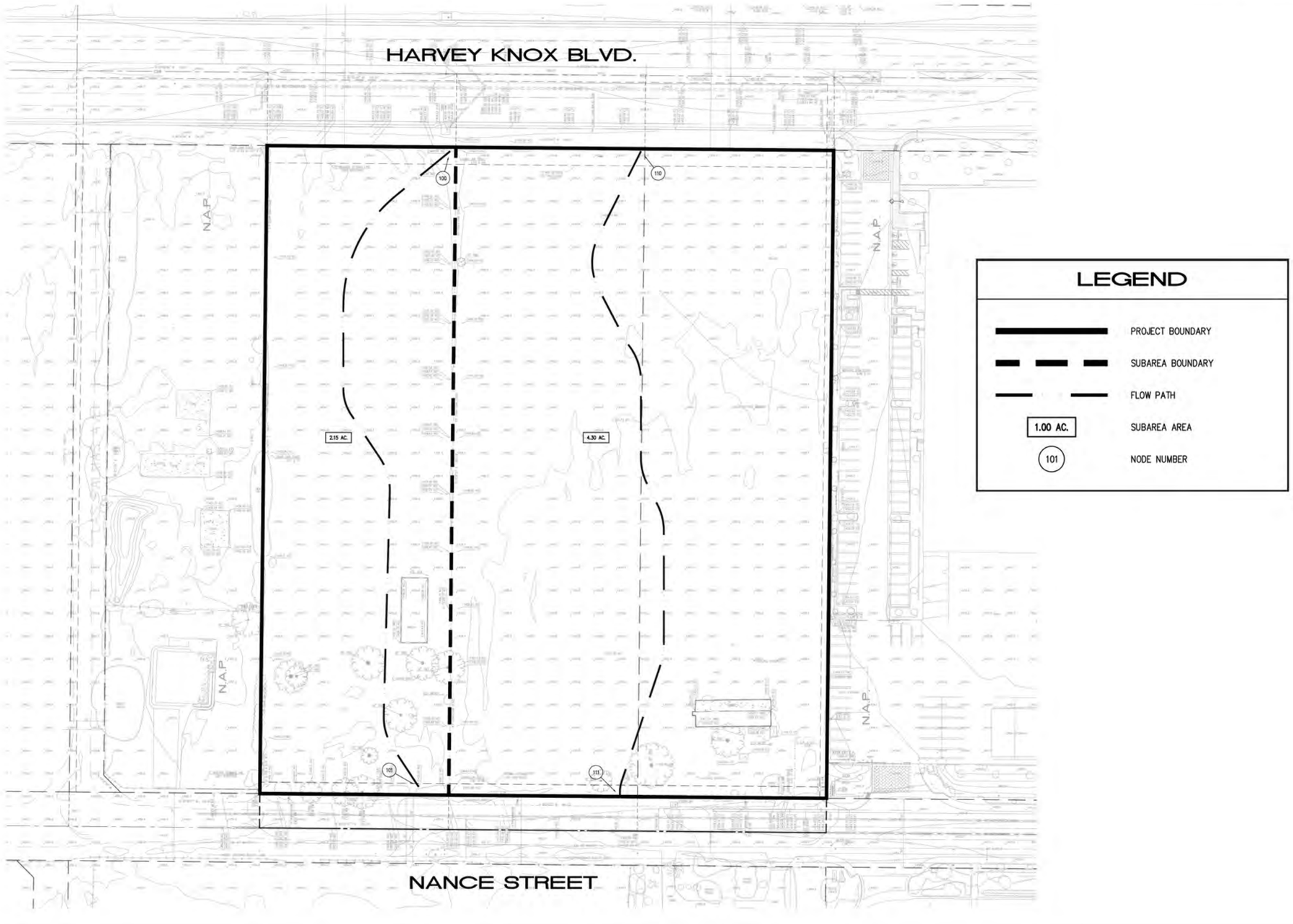
Construction Impacts

As previously discussed, construction of the Project would result in grading and ground disturbance, which would alter the current drainage pattern of the Project site. However, stormwater would continue to flow southerly. Erosion during construction would be related primarily to disturbed soils and sediments that may enter the stormwater during rainfall events or winds, but the implementation of erosion control and sediment control BMPs as part of the SWPPP that would be required under the NPDES Construction General Permit would reduce erosion on and off site. Thus, compliance with existing water quality regulations would prevent erosion hazards, and impacts would be less than significant, and no mitigation is required.

Operational Impacts

Development of the Project would result in the conversion of onsite pervious surfaces to impervious surfaces, which would alter the current drainage pattern of the Project site. By increasing the amount of impervious surfaces on the site, more surface runoff would be generated and the rate and volume of runoff would increase. At the same time, sediments would be reduced with implementation of the Project as impervious surfaces, landscaped areas, and BMPs would reduce suspended sediment in runoff compared to the existing undeveloped conditions. Thus, onsite erosion would be less with the Project. As discussed under Threshold 10a above, to manage surface runoff, stormwater runoff would be directed to underground infiltration chambers, which would remove pollutants in the stormwater. Thus, impacts associated with the alteration of drainage patterns and erosion would be less than significant with adherence to applicable local, regional, and State requirements. No mitigation is required.

10c(ii). **Less than Significant Impact.** A Preliminary Hydrology Report has been prepared for the Project by Thienes Engineering, Inc. (Thienes, 2021b) (Hydrology Report) (December 1, 2021) and is included in Appendix K of this Initial Study. As described above, proposed grading and earthwork activities and the addition of impervious surfaces on the Project site would alter the site's existing interior drainage characteristics (shown on Exhibit 27), but would not substantially alter the drainage pattern of the local area. In the proposed condition (shown on Exhibit 28, the Project

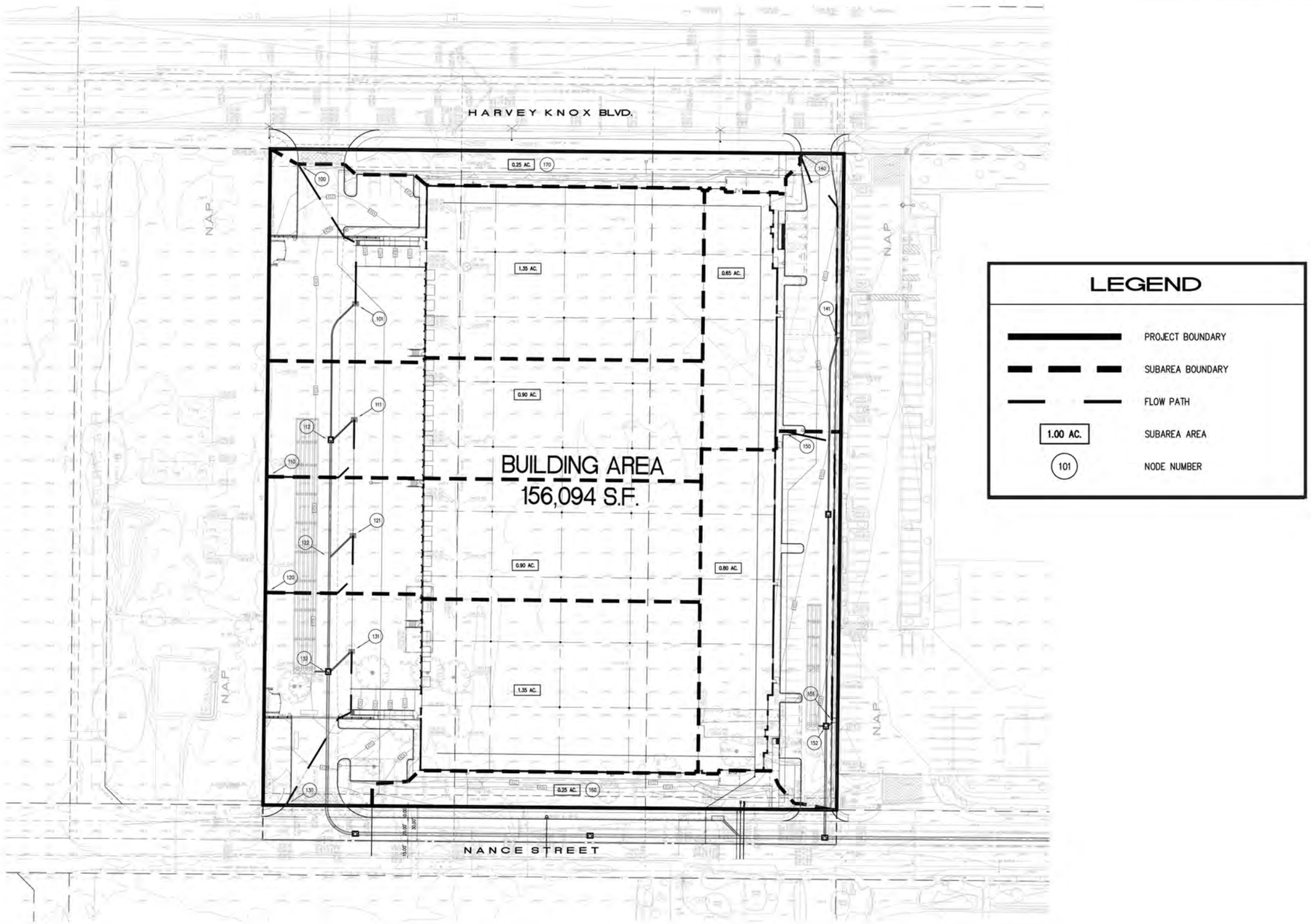


Source(s): Thienes Engineering, Inc. (12-06-2021)

Exhibit 27

Not to Scale

Existing Condition Hydrology Map



Source(s): Thienes Engineering, Inc. (12-06-2021)

Exhibit 28

Not to Scale

Proposed Condition Hydrology Map

site has been designed to generally drain in the same direction as the existing undeveloped condition; the Project site would generally be graded to drain toward the south of the Project site.

As shown on the proposed condition hydrology map on Exhibit 28, and discussed previously, stormwater from the proposed buildings, truck yards, and parking areas would drain to catch basins and then into the proposed underground infiltration chambers located under the western truck yard and eastern parking lot. Proposed storm drain lines – Line A located on the western portion of the site and Line B located on the eastern portion of the site – would convey stormwater to the south and then into a proposed public storm drain system beneath Nance Street that would be constructed as part of the Project, which would ultimately discharge the stormwater into the existing 54-inch public storm drain beneath Redlands Avenue (Lateral D-3), located east of the Project site. Additionally, stormwater runon from the parcel to the west of the Project site would be accommodated through the provision of drainage holes along the proposed wall along the western property boundary ranging in height from 1.5- to 2.2-feet-high; the runoff would be captured in the onsite storm drain system. A catch basin is proposed in Nance Street along with street improvements for the development of the Project site.

As identified in the Hydrology Report, the existing condition 100-year peak flow rates that surface drains to the south is approximately 2.7 cubic feet per second (cfs) from the westerly 2.15 acres and 5.6 cfs from the easterly 4.30 acres. The total existing condition 100-year peak flow rate that surface drains to Nance Street is approximately 8.3 cfs (2.7 cfs + 5.6 cfs). The total proposed condition 100-year peak flow rate is approximately 22.0 cfs (15.6 cfs from the westerly truck yard + 4.6 cfs from the easterly parking lot + 0.9 cfs from the southerly landscaping + 0.9 cfs from the northerly landscaping).

The proposed onsite storm drain lines, and the public storm drain lines in Nance Street Redlands Avenue have designed to accommodate the 100-year storm frequency runoff from the Project site and site to the west under developed conditions. The Project would not cause flooding or otherwise negative affect downstream storm drain facilities.

Based on the foregoing information, development of the Project site as proposed would not substantially alter the existing drainage pattern of the subject property or substantially increase the rate or amount of surface water runoff from the site in a manner that would result in flooding on or off site. Accordingly, a less than significant impact would occur.

10c(iii). Less than Significant Impact. As discussed under Threshold 10a, the Project's construction contractors would be required to comply with a SWPPP and the Project's owner or operator would be required to comply with the Preliminary WQMP (Appendix J of this Initial Study) to ensure that Project-related construction activities and operational activities do not result in substantial amounts of polluted runoff. Therefore, the Project would not provide substantial additional sources of polluted runoff and the impact would be less than significant.

Under existing conditions, runoff sheet flows across the Project site in a north to south direction to Nance Street. As described above, the onsite storm drain system, existing and proposed storm drains in Nance Street, and the storm drain in Redlands Avenue have been sized and designed to adequately accommodate stormwater runoff from

the Project site and adjacent property to the west. This impact is less than significant and no mitigation is required.

10c(iv). **No Impact.** According to the FEMA Flood Insurance Rate Map (FIRM) No. 06065C1430H, the Project site is not located within a 100-year flood hazard area (FEMA, 2014). Accordingly, the Project would have no potential to impede or redirect flood flows within a 100-year floodplain. No impact would occur.

10d. **No Impact.** A tsunami is a very large ocean wave caused by an underwater earthquake or volcanic eruption. The Pacific Ocean is located approximately 38.5 miles southwest of the Project site; consequently, there is no potential for the Project site to be inundated by a tsunami. A seiche occurs when a wave oscillates in lakes, bays, or gulfs as a result of seismic disturbances. The nearest large body of surface water is approximately 1.4 miles east of the Project site (Lake Perris).

As shown on Exhibit S-15, Dam Inundation Map, of the City's General Plan Safety Element, the Project site is located in the identified dam inundation area for Lake Perris (City of Perris, 2016). In July 2005, the California Department of Water Resources (DWR) identified potential seismic safety problems with Perris Dam that could result in significant damage and uncontrolled water releases in the event of a major earthquake. DWR is currently upgrading the seismic safety of Perris Dam; construction to strengthen the foundation began in October 2014 and was completed in April 2018, with additional improvements to the outlet tower and emergency release facility still to be completed. The lake level was lowered to ensure maximum public safety until the dam repairs are complete. Although the Project site is within the dam inundation zone, occurrence of flooding from the Lake Perris Reservoir in the City is extremely remote, as Perris Dam has been engineered and constructed and is being retrofitted with the knowledge that the area is seismically active. Due to the unlikely possibility of dam failure, potential for flooding resulting from the failure of a dam is low. Therefore, dam inundation impact associated with the construction and operation of the Project is less than significant. In addition, the Project also is located outside of the 100-year floodplain. Accordingly, implementation of the Project would not risk release of pollutants due to inundation. No impact would occur.

10e. **No Impact.** As discussed in Threshold 10a above, the Project site is located within the Santa Ana River Basin and Project-related construction and operational activities would be required to comply with the Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Plan by preparing and adhering to a SWPPP and WQMP and by installing and maintaining BMPs. Implementation of the Project would not conflict with or obstruct the Santa Ana River Basin Water Quality Control Plan and no impact would occur.

Under the Sustainable Groundwater Management Act (SGMA) passed in 2014 (*California Water Code* Section 10729[d]), each high and medium priority basin, as identified by the California Department of Water Resources (DWR), is required to have a Groundwater Sustainability Agency (GSA) that will be responsible for groundwater management and development of a Groundwater Sustainability Plan (GSP). The San Jacinto Groundwater Basin is a high priority basin (DWR, 2021).The EMWD Board of Directors is the GSA for the San Jacinto Groundwater Basin and is responsible for development and implementation of a GSP (EMWD, n.d.). EMWD is in the process of developing the GSP for the San Jacinto Groundwater Basin. However, as discussed under Threshold 10b, the Project would not deplete groundwater supplies or interfere with groundwater recharge. Further, EMWD anticipates that it will have enough supplies to meet demands under all water year conditions from 2020 through 2040

(EMWD, 2021a). Therefore, the Project would not conflict with or obstruct implementation of a sustainable groundwater management plan and no impact would occur.

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

The PVCCSP includes Standards and Guidelines applicable to the Project in terms of permitted land uses for the Light Industrial designation. The PVCCSP EIR does not include mitigation measures for this topic.

EXPLANATION OF CHECKLIST ANSWERS

11a. **No Impact.** As shown in the aerial photograph provided on Exhibit 2 and further discussed in Section 2 of this Initial Study, the Project site is undeveloped. Land uses adjacent to the Project site include an unoccupied non-conforming single-family home and vacant land to the west; Nance Street, and a residential structure and semi-truck staging yard to the south; industrial/warehouse uses to the east and southeast; Harley Knox Boulevard, two single-family homes and a semi-truck staging area to the north; and vacant land to the northeast and northwest. Nance Street is mostly unimproved roadway along the southern Project site boundary (it is partially improved along the eastern portion of the southern site boundary). East of the Project site, Nance Street is fully improved and terminates at Redlands Avenue. Harley Knox Boulevard is improved along the northern Project site boundary; the eastern terminus of this roadway is also Redlands Avenue. The Project involves the development of industrial uses at the Project site, consistent with development anticipated by the PVCCSP. Additionally, adjacent sites are also designated for development with industrial uses in the PVCCSP. Rather than dividing a community, the PVCCSP intends to bring the area together as a unified neighborhood for higher quality business development including industrial, commercial, and office uses. The Project site is not part of an established community, and implementation of the Project would not physically divide an established community. No impact would occur.

11b. **No Impact**. The Project site is located within the PVCCSP area in the City of Perris.

Local Planning Programs

All activities undertaken by a planning agency must be consistent with the goals and policies of the agency's general plan. The City of Perris General Plan Land Use Element, as approved in August 2016, plays a central planning role in correlating all City land use issues, goals, and objectives into one set of development policies. The

Land Use Element includes a Land Use Map (approved on January 3, 2013), which was revised with approval of the PVCCSP (refer to Section 1.4 of the PVCCSP) and an associated set of land use designations, goals, policies, and guidelines. The Project is located within Planning Area 1: North Industrial Area, which is generally made up of "industrial" land use designations and uses. While there are some residential uses in this area, the majority of land uses are non-residential (Perris, 2016). As previously discussed in Section 2 of this Initial Study, the existing General Plan land use designation and zoning for the Project site is "Specific Plan." The Project site is within the PVCCSP area and is designated Light Industrial. As identified in the PVCCSP, the Light Industrial designation provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials and retail related to manufacturing. This zone correlates with the "Light Industrial" General Plan land use designation. The Project involves the construction and operation of an approximate 156,094-square-foot industrial building and is consistent with the existing General Plan land use and zoning designations and does not conflict with the General Plan policies. No General Plan amendment, Zone Change, or Specific Plan amendment is required by the Project. The Project would also comply with the applicable standards and regulations in the PVCCSP and the Perris Zoning Code, as identified in this Initial Study. The PVCCSP EIR concludes that implementation of the PCVVSP, of which the Project is a part, would not result in inconsistencies with the General Plan policies. Table 3-9 below addresses the Project's consistency with policies applicable to Light Industrial uses, as outlined in the City's General Plan, that have been adopted for the purpose of avoiding or mitigating an environmental effect.

The Project's consistency with MARB/IPA planning programs, including the Airport Land Use Compatibility Plan, is discussed in the Hazards and Hazardous Materials and Noise sections of this Initial Study.

TABLE 3-9 CONSISTENCY WITH CITY OF PERRIS GENERAL PLAN POLICIES

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
Circulation Element	
Policy I.A. Design and develop the transportation system to respond to concentrations of population and employment activities, as designated by the Land Use Element and in accordance with the designated Transportation System, Exhibit 4.2, Future Roadway Network.	**Consistent:** As described in Section 2.2.2 of this Initial Study, the Project would involve roadway improvements along Nance Street and Harley Knox Boulevard consistent with PVCCSP and the City's General Plan Circulation Element. Notably, Nance Street, which is a Local street, would be completed to is ultimate half-width along the southern boundary of the Project site. Harley Knox Boulevard is an Arterial that has been completed to its ultimate width along the northern boundary of the Project site. The roadway classifications for the roadways in the vicinity of the Project are based on the anticipated traffic volumes that would be generated by PVCCSP uses, such as the Project.
Policy I.B. Support development of a variety of transportation options for major employment and activity centers including direct access to commuter facilities, primary arterial highways, bikeways, park-n-ride facilities, and pedestrian facilities.	**Consistent:** Roadway improvements included as part of the Project would be constructed according to the standards of the City of Perris and would include sidewalks, as required by the PCVVSP. Onsite accommodations for bicyclists, such as bicycle parking, would also be provided onsite, as required, and would encourage this alternative mode of transportation.
Policy II.B. Maintain the existing transportation network while	**Consistent:** The Project maintains the existing

TABLE 3-9 CONSISTENCY WITH CITY OF PERRIS GENERAL PLAN POLICIES

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
providing for future expansion and improvement based on travel demand, and the development of alternative travel modes.	roadway network and provides roadway improvements consistent with the PVCCSP requirements.
Policy III.A Implement a transportation system that accommodates and is integrated with new and existing development and is consistent with financing capabilities.	**Consistent:** The Project incorporates a transportation system that builds upon and improves the existing roadways in the area to support existing development and the Project. In addition to the construction of roadways, the Project Applicant would pay applicable traffic mitigation fees (e.g., North Perris Road and Bridge Benefit District [NPRBBD] fees) that would fund additional traffic improvements to General Plan roadways in the Project area and would go toward the maintaining roadway infrastructure in the Project area.
Policy V.A. Provide for safe movement of goods along the street and highway system.	**Consistent:** All roadway construction and improvements would be completed according to the standards and requirements set forth by the City of Perris and in coordination with the City Engineer to ensure that roadways are safe and efficient.
Policy VII.A. Implement the Transportation System in a manner consistent with Federal, State, and local environmental quality standards and regulations.	**Consistent:** This Initial Study has been prepared in accordance with the State CEQA Guidelines. Although not required to determine transportation impacts pursuant to CEQA, the trip generation for the Project was estimated to determine if a traffic analysis would be required for the Project in accordance with the guidance provided by the City of Perris. As discussed above, a traffic analysis evaluation is not required. Through the required public review of the Initial Study, public agencies can comment on the Project and its consistency with the applicable standards and regulations. By considering the comments of these agencies throughout the development process, the Project would maintain consistency.
Conservation Element	
Policy II.A. Comply with state and federal regulations to ensure protection and preservation of significant biological resources. **Policy III.A.** Review all public and private development and construction projects and any other land use plans or activities within the MSHCP area, in accordance with the conservation criteria procedures and mitigation requirements set forth in the MSHCP.	**Consistent**: As identified in Biological Resources section of this Initial Study and in the associated technical reports presented in Appendices C1 and C2, required biological surveys were conducted for the Project to determine the presence or absence of protected biological resources or protected habitat areas. Based on a Project-specific MSHCP Consistency Analysis, the Project site consists of developed/disturbed and ornamental vegetation types. There are no sensitive plant or animal species or vegetation communities located onsite or within the offsite improvement areas. However, the Project site has the potential to support burrowing owl and migratory birds/foraging raptors, and the smooth tarplant. No burrowing owls or sign of burrowing owls were present during the field survey and no smooth tarplant species was observed during focused surveys. However, implementation of the Project has the potential to impact burrowing owl, if present during construction, and migratory birds if construction occurs during the peak bird nesting season. The

TABLE 3-9 CONSISTENCY WITH CITY OF PERRIS GENERAL PLAN POLICIES

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
	Project incorporates mitigation measures from the PVCCSP EIR (including mitigation measures MM Bio 1 and MM Bio 2) that would ensure that any potential impacts to burrowing owl and migratory birds would be reduced to a less than significant level. Impacts to biological resources would be less than significant.
Policy III.A. Review all public and private development and construction projects and any other land use plans or activities within the MSHCP area, in accordance with the conservation criteria procedures and mitigation requirements set forth in the MSHCP.	**Consistent.** As stated in the Biological Resources section of this Initial Study, the Project area is not located within an MSHCP cell criteria area, proposed MSHCP conservation area, or MSHCP cores and linkages. However, the Project site is an MSHCP-designated burrowing owl survey area, a Criteria Area plant species survey area, and in a Narrow Endemic plant species survey area. In compliance with the requirements of the MSHCP, habitat assessments were conducted for these species, and focused plant surveys were conducted. There are no jurisdictional areas within or adjacent to the Project site. The biological resources technical reports are provided in Appendices C1 and C2 of this EIR. The Project's consistency with the MSHCP was also reviewed in the Biological Resources section of this Initial Study (Threshold 4f) and it was determined that, with implementation of the required PVCCSP EIR mitigation measures, the Project would be consistent with and implement the MSHCP.
Policy IV.A. Comply with state and federal regulations and ensure preservation of the significant historical, archaeological and paleontological resources.	**Consistent:** In compliance with mitigation measure MM Cult 1 of the PVCCSP EIR, a Phase I Cultural Resources Study and a Paleontological Resources Assessment were prepared for the Project to address potential impacts to historic, archaeological, and paleontological resources. No significant historic, archaeological, or paleontological resources were identified within the Project site or offsite improvement areas, and no resources were identified based on the records searches conducted. Additionally, additional mitigation measures MM 5-1, MM 5-2, and MM 7-1 of this Initial Study identify the requirements for monitoring and actions to be taken in the event resources are discovered during construction. These measures have been incorporated into the Project to ensure that any significant historic, archaeological, and/or paleontological sites encountered during construction are protected in accordance with local, State, and federal regulations.
Policy V.A. Coordinate land-planning efforts with local water purveyors.	**Consistent:** As discussed in the Utilities and Service Systems section of this Initial Study, a Water Supply Assessment (WSA) was prepared by the EMWD, the local water purveyor, for the PCVVSP to assess the impact of development allowed by the Specific Plan on existing and projected water supplies. The Project is being developed within the PCVVSP area and is consistent with the PVCC Specific land use and growth assumptions assumed in the WSA prepared

TABLE 3-9 CONSISTENCY WITH CITY OF PERRIS GENERAL PLAN POLICIES

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
	for the PCVVSP. The EMWD determined that it will be able to provide adequate water supply to meet the potable water demand for future development allowed by the PCVVSP as part of its existing and future demands. Therefore, there are sufficient water supplies available to serve the Project from EMWD's existing entitlements and resources. This is consistent with the land use assumptions of the PCVVSP for industrial uses.
Policy VI.A. Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).	**Consistent:** As discussed in the Hydrology and Water Quality section of this Initial Study, development of the Project site would involve grading of more than one acre. Therefore, the Project Applicant would be required to obtain a NPDES General Construction permit and comply with permit requirements effective at the time of construction. A Preliminary WQMP has been prepared for the Project that includes BMPs to manage post-development water quality in order to protect regional water quality. In addition, the Project Applicant shall submit a SWPPP to and receive approval from the City of Perris. The SWPPP shall include a surface water control plan and erosion-control plan citing specific measures to control onsite and offsite erosion during the entire grading and construction period. Groundwater was encountered approximately 23 feet below ground surface during subsurface exploration. Therefore, Project construction and operation would not impact groundwater.
Policy VIII.A. Adopt and maintain development regulations that encourage water and resource conservation.	**Consistent:** As identified in Section 2.0, Project Description, and further discussed in the Greenhouse Gas Emissions and Utilities and Services Systems sections of this Initial Study, the PVCCSP and PVCCSP EIR includes requirements related to water and resource conservation. These requirements have been incorporated into the Project. Notably, as with all new development in the City of Perris and in the EMWD service area, the Project would install water efficient devices and landscaping.
Policy VIII.B. Adopt and maintain development regulations that encourage recycling and reduced waste generation by construction projects.	**Consistent:** As discussed in the Utilities and Service Systems, the Project would comply with the requirements of the CALGreen Code to divert at least 65 percent of construction waste from landfills. This exceeds the 50 percent diversion requirement established in Chapter 7.44, Construction and Demolition Waste Management, of the City's Municipal Code.
Land Use Element	
Policy II.A Require new development to pay its full, fair-share of infrastructure costs.	**Consistent:** The PCVVSP includes an Infrastructure Plan that identifies the utility infrastructure necessary to serve the allowed development in the PCVVSP area. Each individual development, including the Project, is required to implement the infrastructure needed to serve its proposed uses. Water, wastewater, drainage, and dry utility lines that would be installed as part of the

TABLE 3-9 CONSISTENCY WITH CITY OF PERRIS GENERAL PLAN POLICIES

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
	Project are described in Section 2.2.4 of this Initial Study, including installation of a public storm drain line along Nance Street.
Policy III.A Accommodate diversity in the local economy.	**Consistent:** As identified in the Population and Housing section of this Initial Study, the Project would generate construction jobs and, during operation, would generate approximately 152 new jobs. It is anticipated that there would be employment opportunities generated for residents.
Policy V.A. Restrict development in areas at risk of damage due to disasters.	**Consistent:** As discussed in the Hydrology and Water Quality section of the Initial Study, the Project site is not located within the 100-year floodplain or within a dam inundation area. As identified in the Geology and Soils section of this Initial Study, the Project site is not within an Alquist-Priolo Earthquake Fault Zone. Further, compliance with requirements of the PVCCSP and PVCCSP EIR, the City's General Plan measures, and recommendations from the Project-specific geotechnical report would ensure that potential impacts related to geology and soils are less than significant.
Noise Element	
Policy I.A. The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development.	**Consistent:** As discussed in the Noise section of this Initial Study, the existing and future noise environment for the Project site is dominated by transportation-related noise associated with the arterial roadway network, and additional background noise includes aircraft overflight noise from the MARB/IPA (refer to Goal IV below). Industrial uses are considered normally acceptable with exterior noise levels of up to 70 dBA CNEL. Estimated traffic noise levels along Nance Street and Harley Knox Boulevard would not exceed 70 dBA CNEL. As such, the exposure of persons working within the Project site would remain below the established guidelines for industrial uses.
Policy II.A. Appropriate measures shall be taken in the design phase of future roadway widening projects to minimize impacts on existing sensitive noise receptors.	**Consistent:** As part of the Project, Nance Street would be constructed at its ultimate half-section width as a Local street along the Project's southern boundary. Improvements along Harley Knox Boulevard would be limited to construction of access driveways and installation of the required streetscape. As discussed in the Noise section of this Initial Study, the City of Perris Municipal Code limits the hours for construction to between 7:00 AM and 7:00 PM and prohibits construction on Sundays and most legal holidays. Further, PVCCSP EIR construction-related noise mitigation measure would be implemented to minimize noise impacts during construction (refer to mitigation measures PVCCSP MM Noise 1 through PVCCSP MM Noise 4). Additionally, if the non-conforming residential structure west of the Project site has not been removed, a temporary sound wall would be installed along the western site boundary to reduce construction-related noise impacts to a less significant level. No significant noise impacts would

TABLE 3-9 CONSISTENCY WITH CITY OF PERRIS GENERAL PLAN POLICIES

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
	result during construction of proposed roadway improvements.
Policy V.A. New large-scale commercial or industrial facilities located within 160 feet of sensitive land uses shall mitigate noise impacts to attain an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria.	**Consistent:** The nearest sensitive use to the Project site a non-conforming residence approximately 10 feet to the west. As discussed in the Noise section of this Initial Study, the Project's operational noise levels at the nearby receiver locations would range from 49.9 and 52.7 dBA CNEL without a screenwall and from 45.8 and 52.6 dBA CNEL with a screenwall. Based on the results of this analysis, the Project operational noise levels would not generate noise levels in excess of the City of Perris 60 dBA CNEL exterior noise level standard at the nearest receiver locations.
Safety Element	
Policy I.B: Flooding. The City of Perris shall restrict future development in areas of high flood hazard until it can be shown that risk is or can be mitigated.	**Consistent:** As discussed in the Hydrology and Water Quality section of the Initial Study, the Project site is not located within the 100-year floodplain.
Policy I.D. Consult the AICUZ Land Use Compatibility Guidelines and ALUP Airport Influence Area development restrictions when considering development project applications.	**Consistent:** The Project site is located within the MARB/IPA Influence Area Zone D (Flight Corridor Buffer); however, the Project site is not located within the Accident Potential Zone. The Hazards and Hazardous Materials and Noise sections of this Initial Study address the Project's consistency with the MARB/IPA ALUCP and AICUZ study. As identified, the Project incorporates and would comply with PVCCSP EIR mitigation measures MM Haz 3 through MM Haz 5 and impacts associated with airport operations would be less than significant. Refer to the consistency analysis for Policy IV.A of the Noise Element, which addresses aircraft noise.
Policy I.E Seismic Hazards. All development will be required to include adequate protection from damage due to seismic incidents.	**Consistent.** As identified in the Geology and Soils section of this Initial Study, the PVCCSP EIR, and the CBC, as adopted by the City, provide guidelines and parameters that reduce the effects of ground shaking produced by regional seismic events, and the Project Applicant would be required to implement seismic design considerations in accordance with the current CBC, which is reflected in General Plan Measure I.E.5. Further, consistent with General Plan measures and mitigation measure MM Geo 1 from the PVCCSP EIR, the Project would be designed and constructed in accordance with all final Geotechnical Report recommendations (General Plan Measure I.E.2).
Policy II.A. The City shall require roadway improvements to expedite quick and safe travel by emergency responders.	**Consistent:** The Project would construct roadway improvements necessary to serve the proposed use and would improve emergency access to the Project site and surrounding areas. Roadway improvements and access would be constructed in accordance with City standards. This would ensure that access is suitable for quick and safe travel for emergency responders.
Policy II.B. Provide adequate emergency facilities to serve	**Consistent.** As identified in Public Services section of this Initial Study, the Project would be required to

TABLE 3-9 CONSISTENCY WITH CITY OF PERRIS GENERAL PLAN POLICIES

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
existing and future residents.	pay NPRBBD fees, inclusive of the City's Development Impact Fee (DIF), which provides a funding source to construct the police, fire, community amenities, government facilities, and roadway infrastructure necessary to mitigate the impacts of the growth expected in the City of Perris over the next 25 years, including within the PVCCSP area.
Healthy Community Element	
Policy HC 1.3. Improve safety and the perception of safety by requiring adequate lighting, street visibility, and defensible space,	**Consistent.** As described in Aesthetics section of this Initial Study, development of the Project with the proposed industrial warehouse building would introduce new permanent sources of light into the area in the form of signage, building lighting, and parking lot lighting for nighttime operations, security, and safety. Street lighting would also be installed along Nance Street.
Policy HC 2.3. Promote increased physical activity, reduced driving and increased walking, cycling and public transit by: • Requiring where appropriate the development of compact development patterns that are pedestrian and bicycle friendly Increasing opportunities for active transportation (walking and biking) and transit use	**Consistent.** As previously discussed, the Project would include roadway and sidewalk improvements, and would provide facilities to encourage bicycle travel. With respect to transit use, the Project site is currently served by the Riverside Transit Authority (RTA), a public transit agency serving the unincorporated Riverside County region. There are currently no existing bus routes that in close proximity to the Project site. There are currently no existing bus routes along the roadways adjacent to the site; the nearest existing route is Route 19 along Perris Boulevard, approximately 0.3 mile west of the Project site and there are bus stops near the intersection of Perris Boulevard and Nance Street and would be accessible in future when Nance Street is fully improved consistent with the City's standards.
Policy HC 2.4. Promote development patterns and policies that: • Reduce commute times • Encourage the improvement of vacant properties and the reinvestment in neighborhoods • Provide public space for people to congregate and interact socially • Foster safe and attractive environments	**Consistent.** As further discussed in the Transportation section of this Initial Study, the Project is in a designated low-vehicle miles traveled (VMT) area and the Project VMT per employee would be less than the established citywide average, which would also serve to reduce commute times. The Project Applicant would develop the vacant Project site with an industrial use consistent with the design guidelines and development standards outlined in the PVCCSP. The Project includes employee amenities, which would provide space for future employees to interact.
Policy HC 2.6 Encourage land use and urban design to promote physical activity, provide access to nutritious foods, and reduce air pollution	**Consistent.** Refer to the consistency analysis for Policy HC 2.2, Policy HC 2.3, and Policy HC 2.4, above, which address the Project's consistency with policies that promote physical activities. Additionally, as discussed in the Air Quality section, the Project would have less than significant air quality impacts and would incorporate PVCCSP EIR mitigation measures which serve to reduce air pollutant emissions.

TABLE 3-9 CONSISTENCY WITH CITY OF PERRIS GENERAL PLAN POLICIES

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
Policy HC 3.1. Coordinate with transportation service providers and transportation planning entities to improve access to multi-modal transportation options throughout Perris including public transit	**Consistent.** Roadway improvements included as part of the Project would be constructed according to the standards of the City of Perris and would include sidewalks, as required by the PCVVSP. Onsite accommodations for bicyclists, such as bicycle parking, would also be provided onsite, as required, and would encourage this alternative mode of transportation.
Policy HC 3.5. Promote job growth within Perris to reduce the substantial out-of-Perris job commutes that exist today	**Consistent.** As identified in the Population and Housing section of this Initial Study, the Project would generate construction jobs and, during operation, potentially generate 152 new employment opportunities in the City. It is anticipated that there would be employment opportunities generated for local residents.
Policy HC 6.1. Support regional efforts to improve air quality through energy efficient technology, use of alternative fuels, and land use and transportation planning	**Consistent.** As previously identified, an objective of the PVCCSP is to promote sustainable development. Refer to the consistency analysis for Goal V of the Circulation Element, which addresses new technology.
Policy HC 6.2. Support regional water quality efforts that balance water conservation, use of recycled water, and best practices in watershed management	**Consistent.** Refer to the consistency analysis for Policy VIII.A of the Conservation Element, above, which addresses water and resource conservation. Further, as discussed in the Hydrology and Water Quality of this Initial Study, the Project would be implemented in compliance with applicable regulations for the protection of water quality during construction and operation.
Policy HC 6.3. Promote measures that will be effective in reducing emissions during construction activities: • Perris will ensure that construction activities follow existing South Coast Air Quality Management District (SCAQMD) rules and regulations • All construction equipment for public and private projects will also comply with California Air Resources Board's vehicle standards. For projects that may exceed daily construction emissions established by the SCAQMD, Best Available Control Measures will be incorporated to reduce construction emissions to below daily emission standards established by the SCAQMD • Project proponents will be required to prepare and implement a Construction Management Plan which will include Best Available Control Measures among others. Appropriate control measures will be determined on a project-by-project basis, and should be specific to the pollutant for which the daily threshold is exceeded	**Consistent.** As further discussed in the Air Quality section of this Initial Study, the Project would be implemented in compliance with applicable SCAQMD rules in place to protect air quality in the region during construction activities. Additionally, the Project incorporates mitigation measures from the PVCCSP EIR to reduce Project-related construction emissions. The Project's construction-related air pollutant emissions would be less than significant on a regional and local level.

Regional Planning Programs

With respect to regional planning, SCAG is the MPO for six counties: Riverside, Los Angeles, Orange, San Bernardino, Ventura, and Imperial. As the designated MPO, the federal government mandates SCAG to research and draw up plans for transportation, growth management, hazardous waste management, and air quality. Additionally, SCAG reviews projects of regional significance for consistency with regional plans. Regionally significant industrial projects include "A proposed industrial, manufacturing,

or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 sf of floor area." The Project would be located on an approximate 6.4-acre site and includes a 156,094-sf industrial warehouse building, with approximately 152 employees[14]. Thus, the Project is not regionally significant, and assessment of the Project's consistency with regional planning plans/programs is not required. No impacts would occur, and no mitigation is required.

As identified through this consistency analysis, the Project would not 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.

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

12a-12b. **No Impact.** Figure OS-6 of the Riverside County General Plan and the California Department of Conservation's Mineral Land Classification for the area shows that the Project site is located within Mineral Resource Zone 3 (MRZ-3). MRZ-3 indicates areas where the available geologic information indicates that mineral deposits exist or are likely to exist; however, the significance of the deposit cannot be evaluated from available data (County of Riverside, 2015, Figure OS-6). In addition, the California Department of Conservation does not show oil, gas, or geothermal fields underlying the site; and no oil or gas wells are recorded on or near the site in the Division of Oil, Gas, and Geothermal Resources (DOGGR) Well Finder (DOC, 2019). No sites within the City of Perris City limits have been designated as locally important mineral resource recovery sites in the City of Perris General Plan or the Riverside County General Plan (Perris, 2005b). Accordingly, no impact to the availability of a regionally or locally important mineral resource would occur.

[14] This employment estimate is based on the PVCCSP EIR employment factor of 1 employee per 1,030 sf of Light Industrial floor space.

13. NOISE	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
Would the Project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Information presented in this section is based on the Harley Knox Commerce Center Noise Impact Analysis, City of Perris (Noise Analysis) prepared by Urban Crossroads (March 2022) for the Project (Urban Crossroads, 2022e).[15] The Noise Analysis is included in Appendix L of this Initial Study and is summarized herein.

As summarized in the Noise Analysis, the PVCCSP EIR defines noise as unwanted or objectionable sound. The effect of noise on people can include general annoyance, interference with speech communication, sleep disturbance and, in the extreme, hearing impairment. The unit of measurement used to describe a noise level is the decibel (dB). However, since the human ear is not equally sensitive to all frequencies within the sound spectrum, the "A-weighted" noise scale, which weights the frequencies to which humans are sensitive, is used for measurements. Noise levels using A-weighted measurements are written dB(A) or dBA. Decibels are measured on a logarithmic scale which quantifies sound intensity in a manner that is similar to the Richter scale used for earthquake magnitudes. In the case of noise, a doubling of the energy from a noise source, such as the doubling of a traffic volume, would increase the noise level by 3 dBA; a halving of the energy would result in a 3 dBA decrease.

Average noise levels over a period of minutes or hours are usually expressed as dB L_{eq} or the equivalent noise level for that period of time. For example, $L_{eq(3)}$ would represent a three-hour average. When no time-period is specified, a one-hour average is assumed. Noise standards for land use compatibility are stated in terms of the Community Noise Equivalent Level (CNEL) and the Day-Night Average Noise Level (L_{dn}). CNEL is a 24-hour weighted average measure of community noise. The computation of CNEL adds 5 dBA to the average hourly noise levels between 7 p.m. and 10 p.m. (evening hours), and 10 dBA to the average hourly noise levels between 10 p.m. to 7 a.m. (nighttime hours). This weighting accounts for the increased human sensitivity to noise in the evening and nighttime hours. L_{dn} is a very similar 24-hour weighted average which weights only the nighttime hours and not the evening hours. CNEL is normally about 1 dB higher than L_{dn} for typical traffic and other community noise levels.

[15] At the time the Noise Analysis was prepared, the Project was proposed to consist of a 156,780-sf building compared to the currently proposed 156,094-sf of building (a difference of 686 sf). Therefore, the analysis is conservative as it is based development of a slightly larger building.

As identified in the PVCCSP EIR, sensitive receivers are areas where humans are participating in activities that may be subject to the stress of significant interference from noise and often include residential dwellings, mobile homes, hotels, motels, hospitals, nursing homes, educational facilities, and libraries. Other receivers include office and industrial buildings, which are not considered as sensitive as single-family homes, but are still protected by City of Perris land use compatibility standards, as discussed under Threshold 13a below. The nearest sensitive receptor to the Project site is a non-conforming residential use approximately 10 feet west of the Project site, as shown on Exhibit 23, in the Air Quality section of this Initial Study. This property is currently owned by an industrial development that intends to demolish the existing house for redevelopment of the property with a light industrial use, consistent with the PVCCSP land use designation.

To assess the existing noise level environment, four 24-hour noise level measurements were taken at potential receiver locations. The receiver locations were selected to describe and document the existing noise environment within the Project study area. Exhibit 29 depicts the boundaries of the Project site and the noise level measurement locations. To fully describe the existing noise conditions, noise level measurements were collected by Urban Crossroads, Inc. on Tuesday, May 11, 2021. The noise measurement methods are further described in the Noise Analysis included in Appendix L.

The noise measurements focus on the average or equivalent sound levels (L_{eq}). Table 3-10 identifies the hourly daytime (7:01 a.m. to 10:00 p.m.) and nighttime (10:01 p.m. to 7:00 a.m.) noise levels at each noise level measurement location consistent with the City of Perris Municipal Code (City of Perris, 2021). Table 3-10 provides the (energy average) noise levels used to describe the daytime and nighttime ambient conditions. These daytime and nighttime energy average noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number. The background ambient noise levels in the Project study area are dominated by the transportation-related noise associated with the arterial roadway network (i.e., Harley Knox Boulevard, Redlands Avenue, Nance Street, and local roads). This includes the auto and heavy truck activities near the noise level measurement locations. Additional background noise sources include aircraft overflight noise from the MARB/IPA. The 24-hour existing noise level measurements are also shown on Table 3-10. Following is a summary of the noise measurement results.

TABLE 3-10 24-HOUR AMBIENT NOISE LEVEL MEASUREMENTS

Location[1]	Description	Energy Average Noise Level (dBA L_{eq})[2]		CNEL
		Daytime	Nighttime	
L1	Located north of the project site on Harley Knox Blvd along the fence line for the facility located at 225 Jason Ct.	61.3	62.5	68.9
L2	Located southeast of the project site on Nance Street near residence located at 280 E Nance Street.	60.1	57.3	64.4
L3	Located in the eastern portion of the project site.	51.1	48.9	56.1
L4	Located southwest of the project site adjacent to the residence located at 115 E Nance Street.	54.4	53.3	60.3

[1]See Exhibit 27 of Technical Appendix *L* for the noise level measurement locations.
[2]Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix 5.2.
"Daytime" = 7:01 a.m. to 10:00 p.m.; "Nighttime" = 10:01 p.m. to 7:00 a.m.
Source: (Urban Crossroads, 2022e, Table 5-1)

Source(s): Urban Crossroads (06-28-2021)

Figure 29

Not to Scale

Noise Measurement Locations

- **Location L1** represents the noise levels north of the Project site on Harley Knox Boulevard along the fence line for the facility located at 225 Jason Court. The noise level measurements collected show an overall 24-hour exterior noise level of 68.9 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 61.3 dBA L_{eq} with an average nighttime noise level of 62.5 dBA L_{eq}.

- **Location L2** represents the noise levels southeast of the Project site on Nance Street near the residence located at 280 E Nance Street. The noise level measurements collected show an overall 24-hour exterior noise level of 64.4 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 60.1 dBA L_{eq} with an average nighttime noise level of 57.3 dBA L_{eq}.

- **Location L3** represents the noise levels in the eastern portion of the Project site. The noise level measurements collected show an overall 24-hour exterior noise level of 56.1 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 51.1 dBA L_{eq} with an average nighttime noise level of 48.9 dBA L_{eq}.

- **Location L4** represent the noise levels southwest of the Project site adjacent to the residence located at 115 E Nance Street. The noise level measurements collected show an overall 24-hour exterior noise level of 60.3 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 54.4 dBA L_{eq} with an average nighttime noise level of 53.3 dBA L_{eq}.

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

The PVCCSP includes Standards and Guidelines relevant to noise. These Standards and Guidelines were previously presented in the Hazards and Hazardous Materials Section of this Initial Study. Notably, Section 12.1.3, Compatibility with March ARB/IP ALUCP, of the PVCCSP identifies, that "All building office areas shall be constructed with appropriate sound mitigation measures as determined by an acoustical engineer or architect to ensure appropriate interior sound levels."

The following mitigation measures from the PVCCSP EIR for noise impacts are incorporated as part of the Project and are assumed in the analysis presented in this section.

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

PVCCSP MM Noise 2 *During construction, stationary construction equipment, stockpiling and vehicle staging areas would be placed a minimum of 446 feet away from the closest sensitive receptor*[16]*.*

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

[16] Based on the Perris General Plan Noise Element discussion of construction noise (page 69).

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

EXPLANATION OF CHECKLIST ANSWERS

Noise impacts would be considered significant if any of the following occur as a direct result of the Project construction or operational activities. Table 3-11 shows the significance criteria summary matrix.

TABLE 3-11 SIGNIFICANCE CRITERIA SUMMARY

Analysis	Condition(s)	Significance Criteria	
		Daytime	Nighttime
Off-Site	if resulting noise level is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase	
	if resulting noise level is > 60 dBA CNEL	≥ 3 dBA CNEL Project increase	
Operational	At residential land use[1]	80 dBA L_{max}	60 dBA L_{max}
	Within 160 Feet of residential use[2]	60 dBA CNEL	
	if resulting noise level is < 60 dBA L_{eq}[3]	≥ 5 dBA L_{eq} Project increase	
	if resulting noise level is > 60 dBA L_{eq}[3]	≥ 3 dBA L_{eq} Project increase	
Construction	Noise Level Threshold[4]	80 dBA L_{max}	
	Vibration Level Threshold[5]	0.5 PPV (in/sec)	

[1] City of Perris Municipal Code, Section 7.34.040 (Appendix 3.1 of the Noise Analysis included in Appendix L).
[2] City of Perris General Plan Noise Element, Implementation Measure V.A.1.
[3] PVCCSP EIR, Page 4.9-20.
[4] City of Perris Municipal Code, Section 7.34.060 (Appendix 3.1 of the Noise Analysis included in Appendix L).
[5] PVCCSP EIR, Page 4.9-27.
"Daytime" = 7:01 a.m. - 10:00 p.m.; "Nighttime" = 10:01 p.m. - 7:00 a.m.
Source: (Urban Crossroads, 2022e, Table 4-1)

13a. Less than Significant Impact.

Construction Noise Impact Analysis

Construction noise represents a short-term increase on the ambient noise levels. Construction-related noise impacts are expected to create temporary and intermittent high-level noise conditions at receivers surrounding the Project site when certain activities occur at the Project site boundary. To analyze noise impacts originating from the construction of the Project, noise from construction activities is evaluated against standards established under the City's Municipal Code. The City of Perris Municipal Code, Section 7.34.060, identifies that it "is unlawful for any person between the hours of 7:00 PM of any day and 7:00 AM of the following day, or on a legal holiday, with the exception of Columbus Day and Washington's birthday, or on Sundays to erect, construct, demolish, excavate, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise. Construction activity shall not exceed 80 dBA in residential zones in the city." A significant construction noise impact would result for any construction activity that is not in compliance with these requirements.

Noise would be generated by construction equipment operating at the Project site, including a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. The number and mix of construction equipment is expected to occur in the following stages: site preparation, grading, building construction (including utility installation), paving, and architectural coating. As described in Section 10.2 of the Noise Analysis, the construction noise analysis was prepared using reference construction equipment noise levels from the Federal Highway Administration (FHWA) published the Roadway Construction Noise Model (RCNM). The RCNM equipment database provides a comprehensive list of the noise generating characteristics for specific types of construction equipment including reference L_{max} noise levels measured at 50 feet. Noise levels generated by heavy construction equipment can range from approximately 68 dBA to more than 85 dBA L_{max} when measured at 50 feet. However, these noise levels diminish with distance from the construction site at a rate of 6 dBA per doubling of distance. For example, a noise level of 85 dBA L_{max} measured at 50 feet from the noise source to the receiver would be reduced to 79 dBA L_{max} at 100 feet from the source to the receiver, and would be further reduced to 73 dBA L_{max} at 200 feet from the source to the receiver.

Using the reference construction equipment noise levels and the CadnaA (Computer Aided Noise Abatement) noise prediction model[17], calculations of the Project's construction noise level impacts at the nearby receiver locations were completed. Exhibit 30 shows the construction noise source locations in relation to the nearby receiver locations previously described above. The Project construction noise analysis describes on the highest noise level impacts when the equipment with the highest reference noise level operating at the closest point from the Project boundary including the offsite street and storm drain improvements along Nance Street extending from the Project Site to Redlands Avenue to each receiver location. The Project construction noise analysis without the temporary construction noise barriers assumes that the existing non-conforming noise sensitive receivers R2 and R3 have been demolished and redeveloped consistent with underlying industrial land use designation of the PVCCSP. The Project construction noise analysis also includes a construction scenario with the temporary 8-foot-high noise barrier (shown on Exhibit 30) in the event the adjacent non-conforming residences have not yet been demolished. The construction noise levels without a temporary noise barrier are expected to range from 61.0 to 76.7 dBA L_{max}. As shown on Table 3-12, the highest construction levels are expected to range from 68.0 to 76.7 dBA L_{max} at the nearest receiver locations.

[17] As further described in Section 9.3 of the Noise Analysis, CadnaA can analyze multiple types of noise sources using the spatially accurate Project site plan, georeferenced Nearmap aerial imagery, topography, buildings, and barriers in its calculations to predict the outdoor noise levels.

Source(s): Urban Crossroads (06-28-2021)

Figure 30

Not to Scale

Construction Noise Source Locations

TABLE 3-12 CONSTRUCTION NOISE LEVEL SUMMARY WITHOUT A TEMPORARY BARRIER

Receiver Location[1]	Construction Noise Levels (dBA L_{max})					
	Site Preparation	Grading	Building Construction	Paving	Arch. Coating	Highest Levels[2]
R1	73.7	76.7	73.7	71.7	69.7	76.7
R2	-[3]	-[3]	-[3]	-[3]	-[3]	-[3]
R3	-[3]	-[3]	-[3]	-[3]	-[3]	-[3]
R4	65.0	68.0	65.0	63.0	61.0	68.0

[1] Noise receiver locations are shown on Exhibit 28.
[2] Construction noise level calculations based on distance from the project site boundaries (construction activity area) to nearby receiver locations. CadnaA construction noise model inputs are included in Appendix 10.1 of the Noise Analysis included in Appendix L.
[3] Project construction noise analysis without a temporary noise barrier assumes that the existing non-conforming noise sensitive receivers R2 and R3 have been demolished consistent with underlying industrial land use designation of the PVCCSP.
Source: (Urban Crossroads, 2022e, Table 10-2)

The construction noise levels with the temporary 8-foot-high noise barrier as shown on Exhibit 28 are expected to range from 60.2 to 77.9 dBA L_{max}. As shown on Table 3-13, the highest construction levels are expected to range from 67.2 to 77.9 dBA L_{max} at the nearest receiver locations.

TABLE 3-13 CONSTRUCTION NOISE LEVEL SUMMARY WITH A TEMPORARY BARRIER

Receiver Location[1]	Construction Noise Levels (dBA L_{max})					
	Site Preparation	Grading	Building Construction	Paving	Arch. Coating	Highest Levels[2]
R1	73.7	76.7	73.7	71.7	69.7	76.7
R2	74.3	77.3	74.3	72.3	70.3	77.3
R3	74.9	77.9	74.9	72.9	70.9	77.9
R4	64.2	67.2	64.2	62.2	60.2	67.2

[1] Noise receiver locations are shown on Exhibit 28.
[2] Construction noise level calculations with a temporary noise barrier based on distance from the project site boundaries (construction activity area) to nearby receiver locations. CadnaA construction noise model inputs are included in Appendix 10.2 of the Noise Analysis included in Appendix L.
Source: (Urban Crossroads, 2022e, Table 10-4)

As shown on Table 3-12 and Table 3-13 the highest construction noise levels would not exceed the 80 dBA L_{eq} City of Perris Municipal Code threshold for construction activity at the receiver locations with or without a temporary noise barrier. Additionally, the Project's construction activities would be conducted in compliance with the hours of construction identified in the City's Municipal Code, and in compliance with the requirements of the PVVCSP EIR mitigation measures identified previously (refer to mitigation measures MM Noise 1 through MM Noise 4). Therefore, impacts from Project construction noise levels are considered to be less than significant.

Operational Noise from Onsite Sources

The future tenants of the Project are unknown; therefore, to present the potential worst-case noise conditions, this analysis assumes the Project would be operational 24 hours per day, seven days per week. Consistent with similar warehouse and light industrial uses, the expected business operations would primarily be conducted within

the enclosed buildings, except for traffic movement, parking, as well as loading and unloading of trucks at designated loading bays. The onsite Project-related noise sources are expected to include: loading dock activity, truck movements, roof-top air conditioning units, parking lot vehicle movements and trash enclosure activity. The Project operational analysis without a solid screenwall along the western Project site boundary assumes that the existing non-conforming noise sensitive receivers R2 and R3 have been demolished to accommodate redevelopment consistent with underlying light industrial land use designation of the PVCCSP. The Project operational noise analysis with a potential 12-foot screenwall on the perimeter of the loading dock area is provided in the event the adjacent non-conforming residences have not yet been demolished and could be occupied. Exhibit 31 identifies the representative receiver locations and noise source locations used to assess the operational noise levels. The Project's operational noise levels were estimated based on reference noise level measurements of similar operational activities as described in Section 9.2 of the Noise Analysis included in Appendix L of this Initial Study.

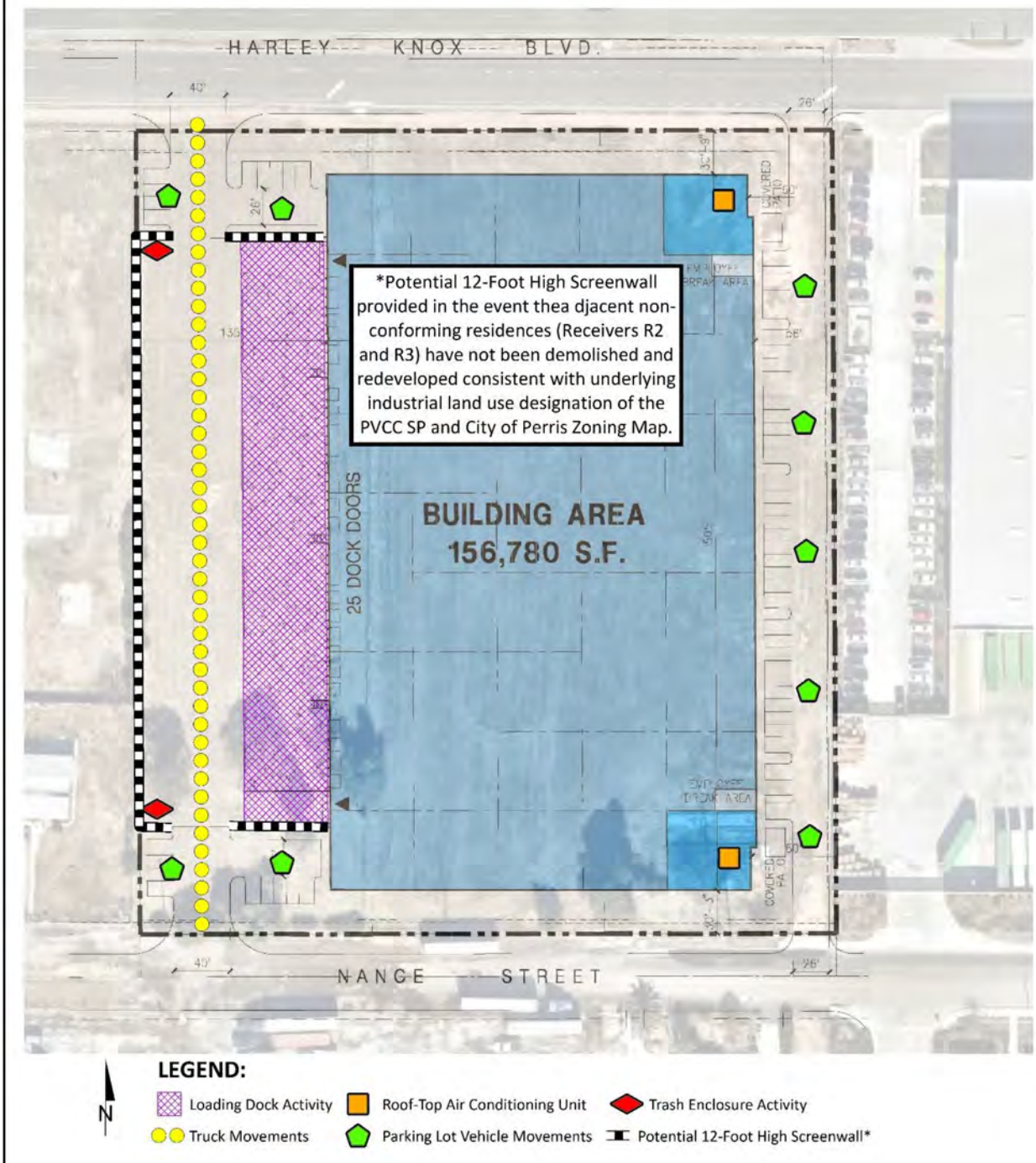
Operational Noise Without a Screenwall

Tables 9-3 and 9-4 of the Noise Analysis provide the Project's operational noise levels without the proposed solid screenwall during the daytime and nighttime hours for the respective operational activities. The daytime hourly noise levels at the offsite receiver locations are expected to range from 55.1 to 56.8 dBA L_{max}. The nighttime hourly noise levels at the off-site receiver locations are expected to range from 55.1 to 56.7 dBA Lmax. To demonstrate compliance with local noise regulations, Table 3-14 presents the Project-only daytime and nighttime operational noise level projections without the solid screenwall against the exterior noise level thresholds established in the City's Municipal Code. Based on the results of this analysis, the Project operational noise levels would not exceed the City's Municipal Code exterior noise level standards at the nearest receiver location during the daytime or nighttime resulting in a less than significant impact.

TABLE 3-14 OPERATIONAL NOISE LEVEL COMPLIANCE WITHOUT A SCREENWALL

Receiver Location[1]	Project Operational Noise Levels (dBA L_{max})[2]		Exterior Noise Level Standards (dBA L_{max})[3]		Noise Level Standards Exceeded?[4]	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	56.8	56.7	80	60	No	No
R2	-[5]	-[5]	80	60	-[5]	-[5]
R3	-[5]	-[5]	80	60	-[5]	-[5]
R4	55.1	55.1	80	60	No	No

[1] See Exhibit 29 for the receiver locations.
[2] Project operational noise levels as shown on Tables 9-3 and 9-4 of the Noise Analysis included in Appendix L of this Initial Study.
[3] Exterior noise level standard as shown on Table 3-1 of the Noise Analysis included in Appendix L of this Initial Study.
[4] Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 7:01 a.m. to 10:00 p.m.; "Nighttime" = 10:01 p.m. to 7:00 a.m.
[5] Project operational noise analysis assumes that the existing non-conforming noise sensitive receivers R2 and R3 have been demolished consistent with underlying industrial land use designation of the PVCC SP and City of Perris Zoning Map.
Source: (Urban Crossroads, 2022e, Table 9-5)



Source(s): Urban Crossroads (06-28-2021)

Figure 31

Not to Scale

Operational Noise Source Locations

Consistent with the City of Perris General Plan Noise Element, Implementation Measure V.A.1, Project operational noise levels at nearest sensitive receiver locations cannot exceed 60 dBA CNEL. The CNEL metric is typically used to describe 24-hour transportation-related noise levels, however, the City of Perris General Plan Noise Element requires new industrial land use such as the Project to demonstrate compliance at any noise-sensitive land use within 160 feet of the Project site. Table 3-15 provides the evening and nighttime adjustments made to the operational noise levels during the applicable hours to convert the worst-case hourly operational noise levels (L_{eq}) to 24-hour CNELs. As shown in Table 3-15 the Project's operational noise levels without the 12-foot screenwall at the nearby receiver locations are shown to range from 43.5 to 46.6 dBA L_{eq} during daytime hours, 49.9 to 52.7 dBA L_{eq} during nighttime hours, and 49.9 to 52.7 dBA CNEL during 24-hour noise levels. Based on the results of this analysis, the Project operational noise levels would not exceed the City's General Plan exterior noise level standards.

TABLE 3-15 OPERATIONAL NOISE LEVEL COMPLIANCE (CNEL) WITHOUT A SCREENWALL

Receiver Location[1]	Project Operational Noise Levels[2]			Exterior Noise Level Standards (CNEL)[3]	Noise Level Standards Exceeded?[4]
	Daytime (dBA L_{eq})	Nighttime (dBA L_{eq})	24-Hour (CNEL)		
R1	46.6	45.9	52.7	60	No
R2	-[5]	-[5]	-[5]	-[5]	-[5]
R3	-[5]	-[5]	-[5]	-[5]	-[5]
R4	43.5	43.2	49.9	60	No

[1] See Exhibit 21 for the receiver locations.
[2] Proposed Project operational noise level calculations are included in Appendix 9.2.
[3] City of Perris General Plan Noise Element Implementation Measure V.A.1
[4] Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 7:01 a.m. to 10:00 p.m.; "Nighttime" = 10:01 p.m. to 7:00 a.m.
[5] Project operational noise analysis assumes that the existing non-conforming noise sensitive receivers R2 and R3 have been demolished consistent with underlying industrial land use designation of the PVCCSP.
Source: (Urban Crossroads, 2022e, Table 9-6)

To describe the Project operational noise level increases without the proposed solid screenwall, the Project's operational noise levels are combined with the existing ambient noise level measurements for the nearby receiver locations potentially impacted by the Project's operational noise sources. As indicated on Tables 9-7 and 9-8 of the Noise Analysis included in Appendix L of his Initial Study, the Project would contribute a daytime operational noise level increase of up to 0.3 dBA L_{eq} and a nighttime operational noise level increase of up to 0.4 dBA L_{eq} at the receiver locations. Since the Project-related operational noise level contributions would not exceed the established significance criteria of 3.0 dBA or 5.0 dBA, the noise increases at the receiver locations would be less than significant.

Operational Noise With a Screenwall

Tables 9-9 and 9-10 of the Noise Analysis provide the Project's operational noise levels with a 12-foot screenwall during the daytime and nighttime hours for the respective operational activities. This analysis is conservative as the Project includes a 14-foot screenwall, which would provide increased noise attenuation and reduced noise levels at off-site receptors, The daytime hourly noise levels at the offsite receiver

locations are expected to range from 48.1 to 59.1 dBA L_{max}. The nighttime hourly noise levels at the off-site receiver locations are expected to range from 47.8 to 59.0 dBA L_{max}. To demonstrate compliance with local noise regulations, Table 3-16 presents the Project-only daytime and nighttime operational noise level projections with a 12-foot screenwall against the exterior noise level thresholds established in the City's Municipal Code. The Project's operational noise levels with a 12-foot screenwall at the nearby receiver locations are shown to range from 50.7 to 59.1 dBA L_{max} during daytime hours and 50.6 to 59.0 dBA L_{max} during nighttime hours. Based on the results of this analysis, the Project operational noise levels would not exceed the City's Municipal Code exterior noise level standards.

TABLE 3-16 OPERATIONAL NOISE LEVEL COMPLIANCE WITH A SCREENWALL

Receiver Location[1]	Project Operational Noise Levels (dBA L_{max})[2]		Exterior Noise Level Standards (dBA L_{max})[3]		Noise Level Standards Exceeded?[4]	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	56.6	56.5	80	60	No	No
R2	48.1	47.8	80	60	No	No
R3	59.1	59.0	80	60	No	No
R4	50.7	50.6	80	60	No	No

[1] See Exhibit 21 for the receiver locations.
[2] Project operational noise levels as shown on Tables 9-9 and 9-11 of the Noise Analysis.
[3] Exterior noise level standard as shown on Table 3-1.
[4] Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 7:01 a.m. to 10:00 p.m.; "Nighttime" = 10:01 p.m. to 7:00 a.m.
Source: (Urban Crossroads, 2022e, Table 9-11)

Table 3-17 includes the evening and nighttime adjustments made to the operational noise levels during the applicable hours to convert the worst-case hourly operational noise levels (L_{eq}) to 24-hour CNELs. The 24-hour noise level calculations are included in Appendix 9.4 of the Noise Analysis. Table 3-17 indicates that with a 12-foot-high screenwall the 24-hour noise levels associated with the Project at the nearest receiver locations are expected to range from 45.8 to 54.0 dBA CNEL. The Project-related operational noise levels shown on Table 3-17 would satisfy the City's 60 dBA CNEL exterior noise level standards at the nearest receiver locations.

TABLE 3-17 OPERATIONAL NOISE LEVEL COMPLIANCE (CNEL) WITH SCREENWALL

Receiver Location[1]	Project Operational Noise Levels[2]			Exterior Noise Level Standards (CNEL)[3]	Noise Level Standards Exceeded?[4]
	Daytime (dBA L_{eq})	Nighttime (dBA L_{eq})	24-Hour (CNEL)		
R1	46.3	45.8	52.6	60	No
R2	44.7	44.1	50.8	60	No
R3	47.9	47.3	54.0	60	No
R4	39.5	39.1	45.8	60	No

[1] See Exhibit 21 for the receiver locations.
[2] Project operational noise level calculations are included in Appendix 9.4 on the Noise Analysis included in Appendix L of this Initial Study.
[3] City of Perris General Plan Noise Element Implementation Measure V.A.1
[4] Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 7:01 a.m. to 10:00 p.m.; "Nighttime" = 10:01 p.m. to 7:00 a.m.
Source: (Urban Crossroads, 2022e, Table 9-12)

To describe the Project operational noise level contributions, the Project's operational noise levels are combined with the existing ambient noise level measurements for the nearby receiver locations potentially impacted by the Project's operational noise sources. As indicated on Tables 9-13 and 9-14 of the Noise Analysis included in Appendix L of this Initial Study, the Project would contribute a daytime operational noise level increase of up to 1.7 dBA L_{eq} and a nighttime operational noise level increase of up to 2.3 dBA L_{eq} at the receiver locations. Since the Project-related operational noise level contributions would not exceed the established significance criteria of 3.0 dBA or 5.0 dBA, the noise increases at the receiver locations would be less than significant.

In summary, noise levels generated from operation of the Project would be less than significant and no mitigation is required.

Traffic Noise Impacts

Noise contours were used to assess the Project's incremental traffic-related noise impacts at land uses adjacent to roadways conveying Project traffic based on the PVCCSP EIR significance criteria presented in Table 3-11. The traffic noise levels provided in the Noise Analysis are based on the traffic forecasts presented in the Harley Knox Commerce Center Trip Generation Assessment prepared by Urban Crossroads and provided in Appendix M of this Initial Study. The Project is expected to generate a net total of approximately 272 trip-ends per day (actual vehicles). The estimated 176 daily Project automobile and 96 daily Project truck trip-ends were assigned to the offsite study area roadway segments. The methods and procedures used to model and analyze the future traffic noise environment are described in Section 6 of the Noise Analysis included in Appendix L of this Initial Study.

Table 7-1 and Table 7-2 in the Noise Analysis included in Appendix L present a summary of the exterior traffic noise levels, without barrier attenuation, for the two nearby study area roadway segments analyzed for Existing, and Existing with Project conditions (Redlands Avenue south of Harley Knox Boulevard and Harley Knox Boulevard east of Perris Boulevard). Appendix 7.1 of the Noise Analysis includes a summary of the traffic noise level contours for each of the traffic scenarios.

Noise contours were used to assess the Project's incremental traffic-related noise impacts at land uses adjacent to roadways conveying Project traffic based on the PVCCSP EIR significance criteria. The noise contours represent the distance to noise levels of a constant value and are measured from the center of the roadway for the 70, 65, and 60 dBA noise levels. The noise contours do not take into account the effect of any existing noise barriers or topography that may attenuate ambient noise levels. In addition, because the noise contours reflect modeling of vehicular noise on area roadways, they appropriately do not reflect noise contributions from the surrounding stationary noise sources within the Project study area. Tables 7-1 and 7-2 of the Noise Analysis included in Appendix L of this Initial Study present a summary of the exterior traffic noise levels, without barrier attenuation, for the study area roadway segments analyzed for Existing and Existing with Project conditions. Appendix 7.1 of the Noise Analysis includes a summary of the traffic noise level contours for each of the traffic scenarios.

The noise level contours under the Existing Plus Project conditions are expected to range from 69.1 to 69.9 dBA CNEL. As shown on Table 3-18, the Project is expected to generate exterior noise level increases ranging from 1.3 to 1.4 dBA CNEL, which

would not exceed the significance thresholds identified above. Therefore, the offsite Project-related traffic noise level increase is considered a less than significant impact under Existing Plus Project condition.

TABLE 3-18 EXISTING CONDITION WITH PROJECT TRAFFIC NOISE IMPACTS

ID	Road	Segment	CNEL at Adjacent Land Use (dBA)[1]			Noise-Sensitive Land Use?[2]	Incremental Noise Level Increase Threshold[3]	
			Existing Ambient	Existing +Project	Project Increase		Limit	Exceeded?
7	Redlands Av.	s/o Harley Knox Bl.	68.5	69.9	1.4	No	n/a	No
15	Harley Knox Bl.	e/o Perris Bl.	67.8	69.1	1.3	Yes	3.0	No

[1] The CNEL is calculated at the boundary of the right-of-way of each roadway and the nearest adjacent land use.
[2] "Yes" = Existing, noise-sensitive land uses adjacent to the study area roadway segment.
[3] Does the Project create an incremental noise level increase exceeding the significance criteria (Table 3-11)?
Source: (Urban Crossroads, 2022e, Table 7-3)

Figure 4.9-2, Land Use Compatibility for Community Noise Exposure, of the PVCCSP EIR, identifies that industrial uses are considered normally acceptable with exterior noise levels of up to 70 dBA CNEL. Based on review of 10-6 of the Noise Analysis included in Appendix L of this Initial Study, estimated traffic noise levels along Redlands Avenue and Harley Knox Boulevard would not exceed 70 dBA CNEL. As such, the exposure of persons working within the Project site would remain below the established guidelines for industrial uses, thereby resulting in a less than significant onsite impact related to traffic noise.

In summary, the Project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of established standards. Therefore, this impact would be less than significant and no mitigation is required.

13b. **Less Than Significant Impact.** Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. It is expected that ground-borne vibration from Project construction activities would cause only intermittent, localized intrusion. Ground vibration levels associated with various types of construction equipment are summarized on Table 10-6 of the Noise Analysis included in Appendix L of this Initial Study. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential Project construction vibration levels using the following vibration assessment methods defined by the FTA.

Using the vibration source level of construction equipment provided on Table 10-6 and the construction vibration assessment methodology published by the FTA, it is possible to estimate the Project vibration building damage impacts. Table 3-19 presents the expected Project related vibration levels at the nearby building structure locations. At distances ranging from 47 to 735 feet from the Project construction boundary to the receiver building locations, construction vibration velocity levels are estimated to range from 0.001 to 0.035 PPV (in/sec). Based on maximum acceptable vibration threshold identified in the PVCCSP EIR of 0.5 PPV (in/sec), the typical Project construction vibration levels would satisfy the building damage thresholds at all receiver building locations. Therefore, the Project-related vibration impacts are

considered less than significant. In addition, the typical construction vibration levels are unlikely to be sustained during the entire construction period. Rather, they would occur only during the times that heavy construction equipment is operating adjacent to the Project site boundaries.

TABLE 3-19 CONSTRUCTION EQUIPMENT VIBRATION LEVELS

Receiver[1]	Distance to Const. Activity (Feet)[2]	Typical Construction Vibration Levels PPV (in/sec)[3]					Thresholds PPV (in/sec)[4]	Thresholds Exceeded?[5]
		Small bulldozer	Jackhammer	Loaded Trucks	Large bulldozer	Highest Vibration Level		
R1	256'	0.000	0.001	0.002	0.003	0.003	0.5	No
R2	78'	0.001	0.006	0.014	0.016	0.016	0.5	No
R3	47'	0.001	0.014	0.029	0.035	0.035	0.5	No
R4	735'	0.000	0.000	0.000	0.001	0.001	0.5	No

[1] Receiver locations are shown on Exhibit 28.
[2] Distance from Project construction boundary to the receiver building structure.
[3] Based on the Vibration Source Levels of Construction Equipment (Table 10-6 of this Noise Analysis included in Appendix L of this Initial Study.
[4] PVCCSP EIR, page 4.9-27.
[5] Does the peak vibration exceed the acceptable vibration thresholds?
"PPV" = Peak Particle Velocity
Source: (Urban Crossroads, 2022e, Table 10-7)

13c. **Less Than Significant Impact.** The Project is not located in the vicinity of a private airstrip and would not expose people to excessive noise levels. The nearest private airport is the Perris Valley Airport, located approximately 6.4 miles south of the Project site. No impact related to noise from private a private airstrip would result.

The MARB/IPA is located approximately 1.5 miles northwest of the Project site. The MARB/IPA ALUCP includes the policies for determining the land use compatibility of the Project because it is located within 2.0 miles of an airport runway. The Project site is within an area designated as Compatibility Zone D (Flight Corridor Buffer) in the 2014 MARB/IPA ALUCP. Compatibility Zone D is considered to have a moderate to low noise impact. Table MA-2 of the MARB/IPA ALUCP indicates that no uses are prohibited in this area except for those which would pose hazards to flights. The Governor's Office of Planning and Research (OPR) guidelines indicate that industrial uses, such as the Project, are considered normally acceptable with exterior noise levels of up to 70 dBA CNEL. The Project site is located outside the 70 dBA CNEL noise level contour for the MARB/IPA, and notably is not within the 55 dBA CNEL noise level contour boundary. The Project would not expose people working at the site to excessive noise levels from airport operations. This impact would be less than significant and no mitigation is required.

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

14a. **Less Than Significant Impact.** The City's population (2018) is estimated at 77,837 persons (SCAG, 2019). The SCAG projections estimate the population of the City will grow to 121,000 residents and 26,400 employees by the year 2045 (SCAG, 2020). The Project does not involve the development of residential uses and would not directly increase the resident population, but the Project would create jobs and increase employment in the City of Perris. The extent to which the new jobs created by a Project are filled by existing residents is a factor that tends to reduce the growth-inducing effect of a Project. The Project would create short-term jobs during the construction phase. These short-term positions would be filled by workers who, for the most part, would already reside in the local area; therefore, construction of the Project would not generate a substantial temporary or permanent increase in population within the Project area.

Table 4.8-E, Development Intensity and Employment Projections, of the PVCCSP EIR, identifies average employment generation factors for the allowed development types identified in the PVCCSP. As this relates to industrial uses, one employee per 1,030 sf is estimated for Light Industrial floor space. The Project consists of the construction and operation of up to 156,094 sf of warehouse/distribution uses which are allowed under the Light Industrial Specific Plan land use designation. Based on this generation factor, the Project could employ approximately 152 new employees[18].

The PVCCSP EIR estimates that implementation of the land uses allowed under the PVCCSP would result in the generation of approximately 56,087 jobs/employees in the area (see Table 4.8-E under Section 4.8, Land Use and Planning, and the discussion of "Growth Inducing Impacts" in Section 5 of the PVCCSP EIR). Therefore, the employment generation estimated for the Project (152 employees) represents approximately 0.3 percent of the total employment generation anticipated in the Specific Plan area and approximately 0.6 percent of the City's projected employment

[18] 156,780-square-foot industrial warehouse use ÷ 1,030 sf of floor area per employee = 152 employees.

base by 2045. Additionally, similar to the short-term construction jobs, it is anticipated that these new warehouse/distribution positions would be filled by workers who would already reside in the local area. Consistent with the conclusions of the PVCCSP EIR, operation of the Project would not generate a permanent increase in population within the City.

The Project would involve the installation of utilities necessary to connect to existing infrastructure systems adjacent to or in the vicinity of the Project site and would involve improvements to adjacent roadways, consistent with the PVCCSP. The Project would not extend roadways or utilities in a manner that would indirectly induce substantial growth in the immediate vicinity of the Project site or elsewhere.

The Project would not directly or indirectly induce substantial population growth. Impacts would be less than significant, and no mitigation is required.

14b. **No Impact.** The Project site is currently undeveloped; and construction of the Project would not require the construction of replacement housing and would not displace any existing housing or residents. Since no relocation of existing residents or construction of replacement housing would result from implementing the Project, no impacts would occur and no mitigation is required.

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

Crime Prevention Measures (Section 4.2.1)

Development projects should take precautions by installing onsite security measures. Security and safety of future users of facilities constructed within the PVCCSP should be considered in the design concepts for each individual development proposal, such as:

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

Offsite Infrastructure Standards (Section 5.4)

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

EXPLANATION OF CHECKLIST ANSWERS

15a. **Less Than Significant Impact.** Fire protection services in the City of Perris are provided by the California Department of Forestry and Fire Protection (CalFire), under contract with and operating as the Riverside County Fire Department (RCFD) for fire and emergency services. RCFD Station 91 is located at 16110 Lasselle Street, approximately 2.2 miles northeast of the Project site. It is anticipated to be the fire station with first response to the Project. RCFD Station 90 is located at 333 Placentia Avenue, approximately 2.3 miles south of the Project site.

While implementation of the Project would not involve new residential uses or an increase in the City's population, the operation of the new industrial warehouse use would increase the demand for fire protection, prevention, and emergency medical services at the currently undeveloped Project site. The Project would create the typical range of service calls for industrial developments, such as medical aid, fire response, traffic collisions, and hazardous materials. The Project would be designed in compliance with all applicable ordinances and standard conditions established by the RCFD and/or the City or State including, but not limited to those regarding fire prevention and suppression measures, such as fire hydrants, fire access, emergency exits, combustible construction, fire flow, and fire sprinkler systems. Compliance with applicable regulations would be confirmed by the RCFD during its review of development plans to ensure it has the capacity to provide proper fire protection to the development.

The Project Applicant would be required to pay NPRBBD fees. The NPRBBD comprises approximately 3,500 acres of land located in the northern portion of the City of Perris. The NPRBBD boundary is the same as the boundary of the PVCCSP. The purpose of the NPRBBD is to improve the efficiency of the financing of specific regional road and bridge improvements that are determined to provide benefit to the developing properties within the NPRBBD boundaries (Perris, 2008). In addition, the NPRBBD includes additional improvements to supplement the Transportation Uniform Mitigation Fee (TUMF) and the City's Developer Impact Fee (DIF) programs. NPRBBD fees

include TUMF and DIF fees. The DIF provides a funding source to construct the police, fire, community amenities, government facilities, and roadway infrastructure necessary to mitigate the impacts of the growth expected in the City of Perris over the next 25 years.

The development of the Project would not cause fire staffing, facilities, or equipment to operate at a deficient level of service. Additionally, the Project would be required to pay into NPRBBD, inclusive of the City's DIF, which provides a funding source for construction of fire facilities as a result of impacts related to future growth in the City. The Project would create a demand for fire protection services but would not require the construction of new or expanded fire protection facilities. Therefore, no impact related to the construction of fire protection facilities would result with implementation of the Project, and no mitigation is required.

15b. **Less Than Significant Impact.** The City of Perris contracts with the Riverside County Sheriff Department (RCSD) for the provision of municipal police services in the City. The Perris Station is located at 137 North Perris Boulevard, approximately 4.8 miles southeast of the Project site. In addition to the City of Perris, this station serves the cities of Glen Valley, Good Hope, Green Acres, Homeland, Juniper Flats, Lake Mathews, Lake Perris, Lakeview, Meadowbrook, Mead Valley, Nuevo, Romoland, Winchester, and Woodcrest (RCSD, n.d.). The station includes a traffic enforcement team, forensic services section, and a Special Enforcement team (gang, burglary, and bicycle officers) and provides support for criminal investigations. In addition, the RCSD Special Enforcement Bureau (similar to SWAT), Hazardous Device Team, Hostage Negotiation Team, Central Homicide Unit, canine support, investigative forensics support, and a number of other services are available to all RCSD stations, as needed.

The Project would generate new employment opportunities; however, the new jobs that would be created by the Project would not induce substantial population growth because most of the new jobs would likely be filled by individuals that reside in the area. Although the Project would not increase the population in the City, it would increase demand for police protection services at the site. Typical operational police protection services involved with the proposed industrial warehouse uses include after-hours patrol, crime and traffic accident/collision responses, and calls for service.

As stated in Threshold 15a, the Project would be required to pay into the NPRBBD, inclusive of the City's DIF, which provides a funding source to construct the police, fire, community amenities, government facilities, and roadway infrastructure necessary to mitigate the impacts of the growth expected in the City of Perris over the next 25 years.

The Project would be designed and operated per applicable standards required by the City, the RCSD, and the PVCCSP for new development in regards to public safety. In addition, the Project would be required to pay into the City's NPRBBD, inclusive of the City's DIF, which provides a funding source for construction of police facilities as a result of impacts related to future growth in the City. The Project would create a demand for police protection and law enforcement services but would not require the construction of new or expanded police protection facilities. Therefore, no impact to the environment related to the construction of police protection facilities would result with implementation of the Project, and no mitigation is required.

15c. **Less Than Significant Impact.** The Project is located within the boundaries of the Val Verde Unified School District (VVUSD) (VVUSD, 2018). The Project would not directly create a source of students, as the Project does not involve the development of

residential land uses. Therefore, no school-age children would be living at the Project, and no direct demand for school services and facilities would occur. Additionally, as previously discussed, it is expected that the new jobs that would be created by the Project would be filled by individuals that reside in the area. Appropriate developer impact fees, as required by State law, shall be assessed and paid by the Developer to the school district. Section 65995(b) of the *California Government Code* establishes the base amount of allowed developer fees and allows increases in the base fee every two years. School districts are placed into a specific "level" based on school impact fee amounts that are imposed on the development. With the payment of the required fees and with no additional students generated from the Project, no significant impacts to school services would result. The Project would not require the construction of new or expanded school facilities, and any potential environmental impact on schools would be less than significant.

15d. **No Impact.** The City's Community Services Department provides community services and recreational and leisure time opportunities and is responsible for the planning, development, and maintenance of the City's parks and recreational facilities. The Project does not propose new residential uses and would not result in a direct increase in the population within the City. Thus, no direct demand for parks would be created by the Project. As previously discussed, it is expected that the new jobs that would be created by the Project would be filled by individuals that reside in the area. The Project would not require the construction of new or expanded recreational facilities. No impact on parks would occur with the Project.

15e. **No Impact.** The Riverside County Library System (RCLS) provides library services in the City through the Perris Branch Library located at 163 East San Jacinto Avenue, approximately 4.8 miles southeast of the Project site. As identified in the PVCCSP EIR Initial Study, development of allowed uses under the PVCCSP, including industrial uses proposed as part of the Project, would not directly increase the demand for library or other public services as no new residential uses would be developed and no direct increase in the resident population would result that may create a demand for library services. As previously discussed, it is expected that the new jobs that would be created by the Project would be filled by individuals that reside in the area. The Project would not require the construction of new or expanded library facilities. No impact on library services would occur with the Project.

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

Industrial Development Standards and Guidelines, Employee Break Areas and Amenities (Section 8.2, Subsection 8.2.1.4)

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

EXPLANATION OF CHECKLIST ANSWERS

16a. **No Impact.** As required by Section 8.2 of the PVCCSP, and further discussed below, the Project would provide onsite employee amenities. The Project would not require the construction or expansion of public recreational facilities or result in or accelerate the physical deterioration of existing neighborhood and regional parks or recreational facilities. This is because the Project does not involve the development of residential uses, and the proposed industrial uses would not create an increase in the use of such facilities. As previously discussed, it is expected that the new jobs that would be created by the Project would be filled by individuals that reside in the area. The Project would not require the construction of new or expanded recreational facilities, and no environmental impacts would result. No mitigation is required.

16b. **Less Than Significant with Mitigation Incorporated.** As shown on the conceptual site plan provided on Exhibit 3, the Project includes an outdoor break area/lunch patio and exercise area. The Project also would provide onsite walkways to parking areas and to sidewalks that would be constructed along the site boundaries on Harley Knox Boulevard and Nance Street, which would connect

to the City-wide system of sidewalks to offsite open space, trails, parks, or other community amenities in the surrounding area. The impacts associated with construction of the Project have been addressed in this Initial Study. The mitigation measures identified in this Initial Study would reduce the potential impacts associated with construction of the Project, including these amenities, would reduce the potential construction-related impacts to less than significant levels.

17. **TRANSPORTATION**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

Pedestrian Access and Onsite Circulation (Section 4.2.2.3)

- **Avoid Conflicts Between Pedestrian and Vehicular Circulation.** Provide a system of pedestrian walkways that avoids conflicts with vehicle circulation through the utilization of separated pathways for direct pedestrian access from public rights-of-way and parking areas to building entries and throughout the site with internal pedestrian linkages.

- **Primary Walkway.** Primary walkways should be 5 feet wide at a minimum and conform to Americans with Disabilities Act (ADA)/Title 24 standards for surfacing, slope, and other requirements.

- **Pedestrian Linkages to Public Realm.** A minimum 5-foot-wide sidewalk or pathway, at or near the primary drive aisle, should be provided as a connecting pedestrian link from the public street to the building(s), as well as to systems of mass transit and other onsite building(s).

Although no longer required for purposes of CEQA, mitigation measure MM Trans 7 in the PVCCSP EIR requires the preparation of project-specific transportation analysis to determine whether projects implementing the PVCCSP would result in transportation impacts. However, the City's Transportation Impact Analysis Guidelines (TIA Guidelines) adopted in June 2021 identify that a traffic operations analysis is required for projects that generate more than 50 peak hour

trips and more than 500 two-way trips per day (both for actual vehicles and passenger car equivalent [PCE] vehicles). Based on the Harley Knox Commerce Center (DPR 21-00006) Trip Generation Assessment (Trip Generation Assessment) (March 23, 2022) provided in Appendix M of this Initial Study, the Project is estimated to generate 272 trip-ends per day with 25 AM peak hour trips and 28 PM peak hour trips (in actual vehicles). Further, the Project is estimated to generate a total of 420 PCE two-way trips per day with 29 PCE AM peak hour trips and 35 PCE PM peak hour trips (Urban Crossroads, 2022f).[19] Therefore, no additional traffic operations analysis is required.

PVCCSP EIR mitigation measure MM Trans 4 requires project developers to contact the Riverside Transit Agency (RTA) prior to project approval to determine if the RTA has plans for the future provision of bus routing within any street that is adjacent to the project site that would require bus stops at the project access points. The RTA was contacted regarding its plans for the future provision of bus routing adjacent to the Project site that could require bus stops at the Project boundaries. The RTA indicated that it currently has no plans to implement bus routes on the streets surrounding the Project site (RTA, 2021). Therefore, the Project has complied with PVCCSP EIR mitigation measure MM Trans 4.

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

The following applicable mitigation measures from the PVCCSP EIR are incorporated into the Project and assumed in the analysis.

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

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

PVCCSP MM Trans 3 *Each implementing development project shall participate in the phased construction of offsite traffic signals through payment of that project's fair share of traffic signal mitigation fees and the cost of other offsite improvements through payment of fair share mitigation fees which include TUMF (Transportation Uniform Mitigation Fee), DIF (Development Impact*

[19] At the time the Trip Generation Assessment was prepared, the Project was proposed to consist of a 156,780-sf building compared to the currently proposed 156,094-sf of building (a difference of 686 sf). Therefore, the analysis is conservative as it is based development of a slightly larger building.

Fee), and the NPRBBD (North Perris Road and Bridge Benefit District)[20]*. The fees shall be collected and utilized as needed by the City of Perris to construct the improvements necessary to maintain the required level of service and build or improve roads to their build-out level.*

PVCCSP MM Trans 5 *Bike racks shall be installed in all parking lots in compliance with City of Perris standards.*

EXPLANATION OF CHECKLIST ANSWERS

17a. **Less than Significant Impact.** The Project's consistency with Perris General Plan goals and policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities is analyzed in the Land Use section of this Initial Study (refer to Table 3.9). As identified and further discussed herein, the Project would not conflict with the General Plan goals and policies.

In compliance with PVCCSP EIR mitigation measure MM Trans 1, the roadway improvements that would be constructed as part of the Project along the site boundaries on Harley Knox Boulevard and Nance Street would comply with the general alignments and right-of-way sections in the PVCCSP. The Project also would pay its fair share of mitigation fees for traffic signals and offsite roadway improvements through the NPRBBD, which includes fees for the TUMF program and the City of Perris DIF (PVCCSP EIR mitigation measure MM Trans 3). With compliance with applicable mitigation measures from the PVCCSP EIR, the Project would not conflict with policies and regulations associated with the roadway circulation system.

With respect to alternative modes of transportation, the City of Perris General Plan identifies alternate modes of transportation as being bus, rail, or pedestrian. Specifically, Policy I.B.1 states: "require onsite improvements that accommodate public transit vehicles (i.e., bus pullouts, transit stops, cueing lanes, bus turnarounds and other improvements) at major trip attractions (i.e., community centers, tourist and employment centers)."

The Project site currently served by the RTA, a public transit agency serving the unincorporated Riverside County region. There are currently no existing bus routes along the roadways adjacent to the site; the nearest existing route is Route 19 along Perris Boulevard, approximately 0.3 mile west of the Project site and there are bus stops near the intersection of Perris Boulevard and Nance Street. In compliance with PVCCSP EIR mitigation measure MM Trans 4, RTA was contacted regarding its plans for the future provision of bus routing adjacent to the Project site that could require bus stops at the Project boundaries. RTA indicated that it currently has no plans to implement bus routes on the streets surrounding the Project site (RTA, 2021). However, when Nance Street is improved to its full width in the future, the bus route along Perris Avenue would be easily accessible from the Project site along the required sidewalks.

The PVCCSP identified the Perris Valley Rail Line (PVL), which was planned as part of RCTC's Metrolink system. This passenger train is now in operation and runs from the Los Angeles Union Station to the Perris-South Station on A Street (near the

[20] The purpose of the NPRBBD is to improve the efficiency of the financing of specific regional road and bridge improvements that are determined to provide benefit to the developing properties within the NPRBBD boundaries. In addition, the NPRBBD includes additional improvements to supplement the TUMF and the City's DIF programs. NPRBBD fees include TUMF and DIF fees.

Orange Empire Railway Museum). The PVL uses the tracks parallel and west of I-215, west of the Project site. Stops along the PVL include the Perris-Downtown Station and Moreno Valley/March Field Station.

The PVCCSP Standards and Guidelines incorporate pedestrian paths and sidewalks into roadway design and provide for trails to accommodate non-motorized forms of transportation throughout the Specific Plan area. Harley Knox Boulevard is designated as a Primary Arterial and Nance Street is designated as a Local street in the PVCCSP. The PVCCSP requires these roadways to include sidewalks; therefore, construction of these roadways as part of the Project would include required sidewalks that would allow direct pedestrian access and movement from the Project site to other areas within the PVCCSP area. Additionally, consistent with PVCCSP Standard and Guideline 4.2.2.3, the sidewalks would extend onto the Project site, providing access to the proposed building and parking areas. Sidewalks to be implemented as part of the Project are shown on the Conceptual Site Plan provided on Exhibit 3.

As shown on Figure 3.0.5, Trails System, of the PVCCSP, and the consistent with the City of Perris Active Transportation Plan adopted in December 2020 (City of Perris, 2020), the nearest identified trail within the PVCCSP area is a regional trail along the Perris Valley Storm Drain (PVSD) Channel located approximately 0.4 mile east of the Project site. This existing trail can be accessed from the terminus of Redlands Avenue northeast of the Project site and connects to the regional trail along Ramona Expressway. The Ramona Expressway trail is planned to ultimately connect to the Metrolink Station on the west side of I-215 and extend to the Lake Perris Fairgrounds.

According to the PVCCSP and the Active Transportation Plan, a Class II Bikeway is defined as a striped lane for one-way bike travel on a street or highway. These bikeways would allow bicyclists and vehicles to share the roadway and avoid potential conflicts between bicycles and vehicle circulation. In the vicinity of the Project site, Class II Bikeways (bike lanes) are identified within the PVCCSP area along Harley Knox Boulevard (existing) and Redlands Avenue (recommended). As required by PVCCSP Trans 5, the Project would provide bicycle parking onsite to accommodate those workers choosing to ride bicycles to and from work. As previously identified, the Project would include roadway improvements (including sidewalks) to be constructed along the site boundaries in accordance with the PVCCSP and City standards (PVCCSP EIR mitigation measure MM Trans 1).

In summary, the Project would not conflict with regional or local programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact is less than significant.

17b. **Less than Significant Impact.** SB 743, approved in 2013, changes the way transportation impacts are determined according to CEQA. Updates to the State CEQA Guidelines approved in December 2018 included the addition of CEQA Guidelines Section 15064.3, of which Subdivision b establishes criteria for evaluating a project's transportation impacts based on project type and using automobile VMT as the metric. As a component of OPR's revisions to the CEQA Guidelines, lead agencies were required to adopt VMT thresholds of significance by July 1, 2020.

As previously discussed, the City of Perris adopted its TIA Guidelines in June 2020. All discretionary land use projects subject to CEQA must evaluate transportation impacts related to VMT as part of the environmental review process. The first step in evaluating a land use project's VMT impact is to perform an initial screening

assessment utilizing the City of Perris VMT Scoping Form for Land Use Projects (hereinafter referred to as VMT Scoping Form). The VMT Scoping Form provides an easy-to-use tool for streamlining the VMT analysis process. Screening criteria can be used to determine whether a project would be expected to cause a less than significant impact without having to conduct a detailed study. The screening criteria adopted by the City of Perris are based on the recommendations from OPR and the Western Riverside Council of Governments (WRCOG) for setting screening thresholds for land use projects and include: a project that provides 100 percent affordable housing, a project within one-half mile of qualifying transit, a project that is a local serving land use, a project in a low VMT area, and a project with net daily trips less than 500 ADT. Relevant to the Project, projects that locate in areas with low VMT, and that incorporate similar features (i.e., land use type, access to the circulation network, etc.), will tend to exhibit similarly low VMT. If a project is located in a Traffic Analysis Zone (TAZ) with VMT per capita or VMT per employee that is less than or equal to the citywide average, then the project is considered to be located in a low VMT area and can be presumed to have a less than significant impact on VMT.

As required by the City's TIA Guidelines, an initial screening assessment utilizing the City of Perris VMT Scoping Form was completed for the Project and is included in Appendix M of this Initial.[21] The Project area is within a low VMT area and the Project's VMT per employee (11.26) would be less than the established citywide average (11.62) based on 2012 base year projections from the Riverside Transportation Analysis Model (RIVTAM). Additionally, the Project would generate less than 500 ADT, and is within ½ mile of qualifying transit (Perris Boulevard). Therefore, the Project would have a less than significant impact on VMT. No mitigation is required and no additional VMT modeling is required. (Urban Crossroads, 2022g)

17c. **Less than Significant Impact.** Roadway improvements in and around the Project site would be designed and constructed to satisfy all City and/or PVCCSP requirements for street widths, corner radii, and intersection control. They also would incorporate applicable design standards for Project access. As discussed in Section 2, Project Description, of this Initial Study, roadways adjacent to the Project site would be improved as part of the Project; and four driveways into the Project site would be provided. The driveways on Harley Knox Boulevard and Nance Street accommodating truck access (the western driveways) would be 40-feet wide and would provide sufficient width to accommodate the anticipated wide turns. In compliance with PVCCSP EIR mitigation measure MM Trans 2, the sight distance at the Project driveways would be reviewed by the City for compliance with the City's and PVCCSP sight distance standards during the plan check process; appropriate sight distance would be provided to avoid hazards.

Additionally, to avoid potential conflicts with truck traffic, pedestrian pathways would be provided along the north and south sides of the proposed building to accommodate pedestrians walking between the overflow parking lots in the northwest and southwest corners of the building and the office spaces.

The Project does not include any design features that would increase traffic hazards due to geometric design features. The Project is consistent with the onsite and surrounding land use and zoning designations, and implementation of the Project

[21] At the time the VMT Scoping Form was prepared, the Project was proposed to consist of a 156,780-sf building compared to the currently proposed 156,094-sf of building (a difference of 686 sf). Therefore, the analysis is conservative as it is based development of a slightly larger building.

would not introduce incompatible uses to the Project area. Impacts related to traffic hazards would be less than significant and no mitigation is required.

17d. **Less than Significant Impact.** Construction activities that may temporarily restrict vehicular traffic flow would be required to implement adequate measures to facilitate the passage of pedestrians, bicyclists, and vehicles through/around any required road closures. Site-specific activities such as temporary construction activities are finalized on a project-by-project basis by the City and are required to ensure adequate emergency access. The roadway improvements that would occur as a part of the Project would improve traffic circulation in the area, in accordance with the PVCCSP. These would also improve the ability of emergency vehicles to access the Project site and surrounding properties.

Regional access to the Project site would be provided via I-215 at the Harley Knox Boulevard interchange. The City's designated truck routes include Harley Knox Boulevard, which provides direct access to the Project site, Perris Boulevard, and Redlands Avenue. Redlands Avenue is an existing roadway that trucks would use to access Nance Street. The Project driveways have been designed to accommodate large trucks with trailers that would be used for the distribution of goods to and from the site. As discussed above, adequate turn radii and sight distance would be provided. Thus, the Project would provide ample vehicular access for emergency vehicles.

The Project is required to comply with the City's development review process including review for compliance with all applicable fire code requirements for access to the site. The Project would be reviewed by the RCFD to determine the specific fire requirements applicable to the Project and to ensure compliance with these requirements. This would ensure that the Project would provide adequate emergency access to and from the site. Therefore, impacts are less than significant and no mitigation is required.

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

No Standards and Guidelines included in the PVCCSP are related to cultural resources. As previously discussed in the Cultural Resources section of this Initial Study, PVCCSP EIR mitigation measure MM Cult 1 outlines the requirements for preparation of a Phase I Cultural Resources Study, which has been completed through preparation of the Phase I Cultural Resources Survey for the Harley Knox 2021 Project, 220-280 East Nance Street, Perris, California (Cultural Resources Survey) prepared by BFSA (June 10, 2021) (BFSA, 2021a). The Cultural Resources Survey is included in Appendix D of this Initial Study and is summarized herein. Mitigation measures MM 5-1 and MM 5-2 included in the Cultural Resources section implement PVCCSP EIR mitigation measures MM Cultural 2 through MM Cultural 4 and MM Cultural 6, as subsequently revised by the City of Perris.

EXPLANATION OF CHECKLIST ANSWERS

Section 4.4, Cultural Resources, of the PVCCSP EIR, includes a detailed discussion of the environmental setting for cultural resources, including geologic setting, ethnohistoric setting, archaeological setting, and historic setting. This information remains applicable to the Project. The Cultural Resources section of this Initial Study summarizes Project-specific existing setting information presented in the Cultural Resources Survey prepared for this Project based on the research and field surveys conducted. Following is a summary of information provided in the Project-specific technical reports relevant to tribal cultural resources.

Paleo Indian, Archaic Period, and the Late Prehistoric Takic groups are the three general cultural periods represented in Riverside County. The discussion of the cultural history of Riverside County presented in the Cultural Resources Survey included in Appendix D references the San Dieguito Complex, Encinitas Tradition, Milling Stone Horizon, La Jolla Complex, Pauma Complex,

and San Luis Rey Complex, since these culture sequences have been used to describe archaeological manifestations in the region. The Late Prehistoric component present in the Riverside County area was represented by the Cahuilla, Gabrielino, and Luiseño Indians. Absolute chronological information, where possible, is incorporated in the Cultural Resources Survey to examine the effectiveness of continuing to interchangeably use these terms. Cultural periods are summarized in the Cultural Resources section of this Initial Study, and further described in the Cultural Resources Survey included in Appendix D; the protohistoric and ethnohistoric periods, which are particularly relevant to tribal cultural resources are summarize below.

Protohistoric and Ethnohistoric Periods

The Project area is located within the traditional cultural territory occupied by the Luiseño. When contacted by the Spanish in the sixteenth century, the Luiseño occupied a territory bounded on the west by the Pacific Ocean, on the east by the Peninsular Ranges mountains at San Jacinto (including Palomar Mountain to the south and Santiago Peak to the north), on the south by Agua Hedionda Lagoon, and on the north by Aliso Creek in present-day San Juan Capistrano. The Luiseño occupied sedentary villages most often located in sheltered areas in valley bottoms, along streams, or along coastal strands near mountain ranges. Villages were located near water sources to facilitate acorn leaching and in areas that offered thermal and defensive protection. Villages were composed of areas that were publicly and privately (by family) owned. Publicly owned areas included trails, temporary campsites, hunting areas, and quarry sites. The most important food source for the Luiseño was the acorn, and seeds, particularly of grasses, composites, and mints, were also heavily exploited. Hunting augmented this vegetal diet; hunting implements included the bow and arrow. The Luiseño had a well-developed basket industry. Baskets were used in resource gathering, food preparation, storage, and food serving. Social groups within the Luiseño nation consisted of patrilinear families or clans, which were politically and economically autonomous. Several clans comprised a religious party, or nota, which was headed by a chief who organized ceremonies and controlled economics and warfare.

The Project area is also located in the region known to have been occupied by the Cahuilla Indians. The Cahuilla occupied territory that included the San Bernardino Mountains, Orocopia Mountain, and the Chocolate Mountains to the west, Salton Sea and Borrego Springs to the south, Palomar Mountain and Lake Mathews to the west, and the Santa Ana River to the north. The Cahuilla differ from the Luiseño and Gabrielino in that their religion is more similar to the Mohave tribes of the eastern deserts than the Chingichngish religious group of the Luiseño and Gabrielino. Cahuilla villages were typically permanent and located on low terraces within canyons in proximity to water sources. These locations proved to be rich in food resources and also afforded protection from prevailing winds. Villages had areas that were publicly owned and areas that were privately owned by clans, families, or individuals. The Cahuilla's use of plant resources is well documented. Plant foods harvested by the Cahuilla included valley oak acorns and single-leaf pinyon pine nuts. The Cahuilla were also hunters; hunting implements included the bow and arrow, throwing sticks, and clubs. The Cahuilla was not a political nation, but rather a cultural nationality with a common language. Clans were composed of 3 to 10 lineages; each lineage owned a village site and specific resource areas. A system of ceremonial hierarchy operated within each lineage.

The territory of the Gabrielino covers much of present-day Los Angeles and Orange counties; however, trade of materials and resources controlled by the Gabrielino extended as far north as the San Joaquin Valley, as far east as the Colorado River, and as far south as Baja California.

Tribal Cultural Resources

BFSA also conducted pedestrian survey of the Project site on April 19, 2021. No tribal cultural resources (or any other resources) were discovered during the survey.

18a(i). **No Impact.** As further discussed in the Cultural Resources section of this Initial Study, BFSA conducted a records search at the EIC located at the University of California, Riverside. The results of the records search are provided in the Confidential Appendix of the Cultural Resource Survey, which is available to qualified individuals. Based on the results of the records search, no tribal cultural resources were located within the Project area. Only two archaeological sites within one mile of the Project area were prehistoric resources (RIV-7758, bedrock milling features and an associated lithic scatter; RIV-4206, a prehistoric bedrock milling feature). BFSA also requested a records search of the Sacred Lands Files (SLFs) from the NAHC which did not list any sacred sites or locations of religious or ceremonial importance within the Project site. Based on this search and review of existing literature related to cultural resources within the Project site, no tribal cultural resources listed or eligible for listing in the CRHR or in a local register of historical resources were identified.

18a(ii). **Less than Significant with Mitigation Incorporated.** On October 26, 2021, the City of Perris sent Project notification letters to the following tribes that have requested such notification: Agua Caliente Band of Cahuilla Indians, Morongo Band of Mission Indians, Pechanga Band of Mission Indians, Rincon Band of Mission Indians, Soboba Band of Luiseño Indians. The following tribes requested consultation with the City: Soboba Band of Luiseño Indians, Pechanga Band of Mission Indians, and Agua Caliente Band of Cahuilla Indians. The City provided information to the tribes, as requested, including the technical reports prepared (including the Cultural Resources Survey provided in Appendix D of this Initial Study and the Confidential Appendix available at the City), Project plans, and mitigation. The consultation process did not result in the identification of tribal cultural resources on or near the Project site. The consultation process has been completed.

In addition to the Native American scoping and consultation, pursuant to the requirements of AB 52, being completed by the City of Perris, the City requires consultants completing cultural resources studies to contact NAHC for a sacred land file (SLF) search. On April 8, 2021, a request was sent to the NAHC for a review of their Sacred Lands File (SLF) within or near the Project site. On April 22, 2021, the NAHC provided results of their review and a list of tribal groups and representatives affiliated with the Project site. A review of the NAHC SLF failed to indicate the presence of Native American traditional sites/places within the Project site.

A field survey was conducted on April 19, 2021; no cultural resources, including tribal cultural resources, were observed during the field survey. The Project site shows no evidence of the presence of tribal cultural resources; therefore, Native American monitoring of construction activities is not recommended. Nevertheless, there is the possibility that undiscovered in-tact archaeological deposits, such as historic refuse, prehistoric middens, disturbed archaeological sites, or other cultural resources, could be discovered during grading activities that may extend below the disturbed soils and fill soils. Without mitigation, construction activities including excavation could encounter unknown tribal cultural resources resulting in a potentially significant impact. Mitigation measure MM 5-1 (presented in the Cultural Resources section of this Initial Study) requires that Native American representatives be notified if any artifacts of

Native American origin are discovered and identifies steps that would be taken to ensure potential impacts to tribal cultural resources are less than significant. It should also be noted that mitigation measure MM 5-2 (presented in the Cultural Resources section of this Initial Study) implements PVCCSP EIR mitigation measure MM Cult 6, as subsequently revised by the City, and identifies actions to be taken in the event that human remains are found.

19. UTILITIES AND SERVICE SYSTEMS	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
Would the Project:				
a) Require or result in the relocation or construction of new or expanded water, or stormwater 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?	☐	☐	☐	☒

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

19a. **Less Than Significant Impact.** As described in Section 2.2.4, Proposed Utility Infrastructure, of this Initial Study, the Project would include the construction of an onsite network of water, wastewater, storm drain, natural gas, electric, and telecommunications utility infrastructure that would connect to existing lines adjacent to or in the vicinity of the Project site. Water, wastewater, and dry utility infrastructure is located in Nance Street and it is anticipated that lateral connections would be made to these lines to serve the Project. A new public storm drain would be installed along Nance Street, which would connect to the existing public storm drain in Redlands Avenue. The installation of the proposed infrastructure improvements would result in physical environmental impacts; however, these impacts have already been included

in the analyses of construction-related effects presented throughout this Initial Study. As identified through the analysis presented in this Initial Study, with implementation of required PVCCSP EIR mitigation measures, the construction of infrastructure necessary to serve the Project would not result in any significant physical effects on the environment. This impact would be less than significant and no additional mitigation measures beyond those identified throughout this Initial Study for potential construction impacts would be required.

19b. **Less Than Significant Impact.** The Project site is located within the Eastern Municipal Water District (EMWD) service area, which would supply water to the Project. Section 4.11, Utilities and Service Systems, of the PVCCSP EIR discusses the following related regulations applicable to the analysis of water supply: the Water Conservation in Landscaping Act (Sections 13550–13556 of the California Water Code), the Urban Water Management Planning Act, California Water Supply Laws (preparation of a Water Supply Assessment (WSA)), the Water Conservation Act, the Riverside County Water Efficient Landscape Requirements Ordinance, Eastern Municipal Water District Policies, and City of Perris General Plan measures.

In compliance with Sections 10910–10915 of the California Water Code (commonly referred to as "Senate Bill 610" (SB 610) according to the enacting legislation), a WSA was prepared for the PVCCSP to assess the impact of development allowed by the PVCCSP on existing and projected water supplies. The EMWD approved this WSA in July 2011 and determined that existing and planned EMWD water supplies are sufficient to meet project-related demands (City of Perris, 2012b). Subsequently, the EMWD adopted its updated 2020 UWMP, which contains more accurate projections for water supply and ability to serve uses within its service area, including the PVCCSP area. The Project is being developed within the PVCCSP area and is consistent with the PVCCSP land use and growth assumptions assumed in the WSA prepared for the PVCCSP.

Based on the water usage assumptions presented in Table 4.11-D, Perris Valley Commerce Center Project Water Usage, of the PVCCSP EIR, the Project is anticipated to have a projected water demand of approximately 4.8 acre-feet per year (afy). This is approximately 0.2 percent of the projected water usage from the entire Specific Plan area (2,671.5 afy). However, based on more stringent water conservation requirements currently in place compared to when the PVCCSP EIR was prepared, the water demand from the Project is anticipated to be less.

The EMWD adopted its 2020 UWMP, which details the reliability of the EMWD's current and future water supply. The EMWD has four sources of water supply: imported water from the Metropolitan Water District of Southern California (Metropolitan), potable groundwater, desalinated groundwater, and recycled water. As outlined in the 2020 UWMP, EMWD has the ability to meet current and projected water demands through 2045 during normal, historic single-dry and historic multiple-dry year periods using imported water from Metropolitan with existing supply resources. Planned local supplies will complement imported supplies and improve reliability for EMWD and the region. EMWD will continue to rely on imported water from Metropolitan as the main source of supply for its retail and wholesale customers, yet recognizes the need to increase local supplies and water conservation to manage supply and demand. Based on the information provided in Metropolitan's UWMP, Metropolitan has sufficient supply capabilities to meet the expected demands of its member agencies from 2020 through 2045 under normal, historic single-dry and historic multiple-dry year conditions. If another multiple-dry year period were to occur

over the next five years, Metropolitan could declare an allocation. EMWD is able to respond to a potential allocation through implementation of its WSCP and its balance of carry over credits in the Hemet/San Jacinto Management Plan Area. (EMWD, 2021a)

The EMWD's future year water demand forecasts are based on SCAG's regional projections, which rely on the adopted land use designations contained within the general plans that cover the geographic areas within the EMWD's service area. Because the Project would be consistent with the PVCCSP's land use designation for the site, the water demand associated with the Project was considered in the demand anticipated by the 2020 UWMP and analyzed therein. As stated above, the EMWD expects to have adequate water supplies to meet all its demands until at least 2045; therefore, the EMWD has sufficient water supplies available to serve the Project from existing entitlements/resources and no new or expanded entitlements are needed. Accordingly, impacts would be less than significant and mitigation is not required.

19c. **Less Than Significant Impact.** As identified in the PVCCSP EIR Initial Study (Section 12, Utilities and Service Systems), the EMWD would provide sanitary sewer service to the Project. Wastewater generated by the Project would be treated at the Perris Valley Regional Water Reclamation Facility (PVRWRF) located south of Case Road and west of the I-215 Freeway. The PVRWRF currently treats an estimated 15.5 million gallons per day (mgd) but has a current capacity of 22 mgd; the PVRWRF has the potential to expand capacity to 100 mgd (EMWD, 2021b).

The PVCCSP EIR estimates that future development under the Specific Plan would generate approximately 5.3 mgd of wastewater to be treated at the PVRWRF. The EIR concludes that wastewater treatment capacity is adequate to serve the future development allowed by the PVCCSP in addition to existing wastewater generation in the EMWD service area because (1) the total estimated wastewater generation from the PVCCSP is within the available (i.e., excess) capacity of the PVRWRF (15 mgd at the time of PVCCSP EIR preparation); (2) the PVRWRF has been expanded to treat 22 mgd; and (3) the EMWD has the ability to reduce diverted flows to the PVRWRF, as the wastewater diversions are solely operational decisions.

Based on the wastewater generation factor of 1,700 gallons per day per acre (gpd/acre) for Light Industrial land use designations applied in the PVCCSP EIR (refer to Table 4.11-I, PVCC Projected Generation of Wastewater), the Project would generate approximately 10,880 gpd (0.01 mgd) of wastewater that would be treated at the PVRWRF. As such, the Project's wastewater generation represents approximately 0.2 percent of the PVCCSP's total estimated wastewater generation (5.3 mgd). Therefore, the Project is within the anticipated wastewater generation for the PVCCSP and could be adequately treated at the PVRWRF. There would be a less than significant impact related to wastewater treatment capacity and no additional mitigation is required.

19d. **Less Than Significant Impact.** Trash, recycling, and green waste service in the City of Perris is provided by CR&R Waste Services. In addition to normal trash collection, the County of Riverside also sponsors several hazardous waste collection events throughout the year. Waste is transported to the Perris Transfer Station and Materials Recovery Facility located at 1706 Goetz Road, approximately 6.0 miles south of the Project site. At this facility, recyclable materials are separated from solid wastes. Recyclable materials are sold in bulk and transported for processing and transformation for other uses. Solid waste produced from the Project would be

transported to either (1) the Badlands Landfill on Ironwood Avenue in Moreno Valley, which has a permitted daily capacity of 4,800 tons per day (tpd) or (2) the El Sobrante Landfill on Dawson Canyon Road in Corona, with a permitted daily capacity of 16,054 tpd (CalRecycle, 2019a; CalRecycle, 2019b).

Construction-Related Solid Waste

The PVCCSP EIR estimates that construction of future development under the Specific Plan would generate approximately 104,671.09 tons of solid waste over the 20-year construction period, which was determined to be approximately 0.10 percent of the combined annual capacity (i.e., yearly intake) of the Badlands and El Sobrante Landfills (see PVCCSP EIR Table 4.11-J, Estimated Construction-Related Solid Waste Generation and Contribution). The PVCCSP EIR concludes that, with development of the PVCCSP, construction-related solid waste would not substantially contribute to exceeding the permitted capacity of these landfills.

Based on the U.S. Environmental Protection Agency's (USEPA's) new construction waste generation rate of 3.89 pounds per square foot (lbs/sf) for Light Industrial uses, as applied in the PVCCSP EIR, construction of the proposed 156,094 sf of industrial warehouse/distribution uses would generate approximately 303.6 tons of solid waste over the construction period. This represents approximately 0.3 percent of the estimated construction solid waste stream from the development of allowed PVCCSP uses, which was determined to be accommodated by the landfills serving the City. Construction of the Project is anticipated to occur over a period of approximately 13 months, which corresponds to an average of approximately 1.2 tons of construction waste generated per day from building construction activity. However, based on more stringent requirements for waste reduction and diversion from landfills (discussed in Threshold 19e, below), it is anticipated the solid waste generated by the Project during construction that would be diverted to landfills would be reduced compared to the estimate in the PVCCSP EIR. Therefore, the disposal of construction-related solid waste associated with the Project would not exceed the permitted capacity of the Badlands or El Sobrante Landfills, and the impact would be less than significant.

Operational Solid Waste

The PVCCSP EIR estimates that operation of future development under the PVCCSP would generate approximately 544,048.96 tons per year of solid waste, which was determined to be approximately 10.65 percent of the combined annual capacity (i.e., yearly intake) of the Badlands and El Sobrante Landfills (see Table 4.11-K, Anticipated Solid Waste Generation and Contribution). The PVCCSP EIR concludes that, with development of the PVCCSP, operational solid waste would not substantially contribute to exceeding the permitted capacity of these landfills.

Based on the operational solid waste disposal factor of 0.0108 ton per sf per year for the Light Industrial land use designation of the PVCCSP used in the PVCCSP EIR, the Project's 156,094 sf of proposed industrial warehouse/distribution uses would generate approximately 1,685.82 tons/year of solid waste requiring landfill disposal. This represents approximately 0.3 percent of the estimated annual operational solid waste stream from the development of allowed PVCCSP uses, which was determined to be accommodated by the landfills serving the City. However, based on more stringent requirements for waste reduction and diversion from landfills (discussed in Threshold 19e, below), it is anticipated the solid waste generated by the Project during operation that would be diverted to landfills would be reduced compared to the

estimate in the PVCCSP EIR. Therefore, the disposal of operational solid waste associated with the Project would not exceed the permitted capacity of the Badlands or El Sobrante Landfills, and the impact would be less than significant.

19e. **No Impact.** Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to decrease solid waste generation through mandatory reductions in solid waste quantities (e.g., through recycling and composting of green waste) and the safe and efficient transport of solid waste. The Project would be required to coordinate with CR&R Waste Services to develop a collection program for recyclables, such as paper, plastics, glass, and aluminum, in accordance with local and State programs, including AB S41, Mandatory Commercial Recycling, and the California Solid Waste Reuse and Recycling Act of 1991.

Additionally, the Project would be required to comply with applicable practices enacted by the City under the California Integrated Waste Management Act of 1989 (AB 939) and any other applicable local, State, and federal solid waste management regulations. AB 939 required that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The diversion goal has been increased to 75 percent by 2020 by SB 341. Further, the Solid Waste Disposal Measurement Act of 2008 (SB 1016) was established to make the process of goal measurement (as established by AB 939) simpler, more timely, and more accurate. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population (or in some cases employment); and (2) its disposal, as reported by disposal facilities. In 2019 (the last year data was approved), the City implemented 38 programs to reduce solid waste generation and achieve the increased solid waste diversion required. These programs involve composting, facility recovery, household hazardous waste, policy incentives, public education, recycling, source reduction, and special waste materials (CalRecycle, 2019c). The City had an average disposal rate of 6.1 pounds per resident per day and 23.7 pounds per employee per day in 2019, which does not exceed the established disposal rate target of 6.3 pounds per resident per day but exceeds the disposal rate target of 20.6 pounds per employee per day (CalRecycle, 2019d).

The CALGreen Code requires all new developments to divert 65 percent of non-hazardous construction and demolition (C&D) debris for all Projects. In compliance with these regulations, the Project contractor would submit a waste management plan to the City as part of the building or grading permit. The plan would include the estimated volumes or weights of C&D materials that would be generated, diverted, reused, given away or sold, or landfilled, including vendors and facilities that would receive the C&D materials. The Project would comply with the CALGreen Code requirements for C&D diversion. In addition, building operators would participate in the City's recycling programs and comply with hazardous waste disposal regulations. As such, the Project would not conflict with any federal, State, or local regulations related to solid waste. Therefore, no impact related to compliance with solid waste statutes would occur, and no mitigation is required.

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

EXPLANATION OF CHECKLIST ANSWERS

20a-20e. No Impact. According to Exhibit S-16, Wildfire Constraint Areas, of the City General Plan Safety Element, the Project site is not located in or near an area identified as being a "Wildfire Hazard Area." Additionally, according to the California Department of Forestry and Fire Protection's (Cal Fire) Fire and Resources Assessment Program (FRAP), the Project site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ) of the City (CalFire, 2020). The Project site is located within the limits of the City of Perris and is, therefore, not within a State Responsibility Area[22]. Therefore, the Project would have no impacts related to wildfires or the associated issues identified in Thresholds 20a through e, above. No impacts would occur and further analysis of this issue is not required.

[22] The State Responsibility Area (SRA) is the land where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within city boundaries or in federal ownership.

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

EXPLANATION OF CHECKLIST ANSWERS

21a. **Less than Significant with Mitigation Incorporated.** The majority of the Project site consists of disturbed/developed area (6.25 acres) and ornamental (exotic) vegetation (0.18 acre). No burrowing owls or evidence of recent or historic use by burrowing owls was observed on the Project site and no other sensitive biological resources, habitat, or species (fish, wildlife, or plant) were located on the Project site. With payment of the required MSHCP mitigation fee and SKR mitigation fee, impacts to biological resources would be less than significant.

Additionally, potential impacts to historic and archaeological resources are discussed in the Cultural Resources section of this Initial Study, potential impacts to paleontological resources are addressed in the Geology and Soils section, and potential impacts to tribal cultural resources are addressed in the Tribal Cultural Resources section. No impact on historical resources would occur; and potential impacts to archaeological, paleontological, and tribal cultural resources, if encountered during construction, would be less than significant with adherence to the identified PVCCSP EIR mitigation measure and Project-specific mitigation measure.

21b. **Less than Significant with Mitigation Incorporated.** As identified through the analysis presented in this Initial Study, with incorporation of applicable mitigation measures from the PVCCSP EIR and PVCCSP Standards and Guidelines, the Project would have no impact or less than significant impacts related for each topical issue with the exception of aesthetics (construction-related lighting), archaeological resources, geology and soils (paleontological resources), and tribal cultural resources, for which the Project's impacts would be potentially significant prior to incorporation of Project-specific mitigation measures. Because Project impacts would be less than significant after mitigation, impacts associated with the Project would not result in

cumulatively-considerable impacts when added to the impacts of other Projects planned or proposed in the vicinity of the site. Cumulative impacts would be less than significant.

21c. **Less than Significant with Mitigation Incorporated.** With development of the Project site, the Project could create environmental effects that will directly or indirectly cause adverse effects on human beings. These include, but are not limited to, noise and air quality. Implementation of PVCCSP Standards and Guidelines, applicable mitigation measures in the PVCCSP EIR, and Project-specific mitigation measures would reduce these impacts to less than significant levels after mitigation. No significant and unavoidable impacts on human beings would occur with the Project.

SECTION 4.0 REFERENCES

Following is a list of reference used in preparation of this Initial Study, corresponding citations are presented in the Initial Study text, as applicable.

Brian F. Smith and Associates (BFSA). 2021a (June 10). A Phase I Cultural Resources Survey for the Harley Knox 2021 Project. Poway, CA: BFSA.

———. 2021b (June 10). Paleontological Assessment for the Harley Knox 2021 Project. Poway, CA: BFSA.

Cadre Environmental (Cadre). 2021a (June 21). Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis for the Harley Knox Commerce Center Project Site, City of Perris, Wester Riverside County. Carlsbad, CA: Cadre.

———. 2021b. (June 21). Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Sensitive Plant Surveys for the 6.43-Acre (1.22-Acre Offsite Impact Area0 Harley Knox Commerce Center Project Site, City of Perris, Western Riverside County, California. Carlsbad, CA; Cadre.

California Department of Forestry and Fire Protection (CalFire). 2020 (January 13). California Fire Hazard Severity Zone Viewer. Sacramento, CA: CalFire. https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414.

California Department of Resources Recycling and Recovery (CalRecycle). 2019a (May 21, 2021, access date). Facility/Site Summary Details: Badlands Sanitary Landfill (33-AA-0006). Sacramento, CA: CalRecycle. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367.

———. 2019b (May 21, 2021, access date). Facility/Site Summary Details: El Sobrante Landfill (33-AA-0217). Sacramento, CA: CalRecycle. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2280?siteID=2402.

———. 2019c (May 21, 2021, access date). Diversion Program System (DPS), Jurisdiction Waste Diversion Program Summary. Sacramento, CA: CalRecycle. https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionSummary.

———. 2019d (May 21, 2021, access date). Jurisdiction Per Capita Disposal Rate Trends (Post 2006) (Jurisdiction: Perris). Sacramento, CA: CalRecycle. https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/DiversionDisposal.

California Department of Transportation (Caltrans). 2018. California State Scenic Highway System Map. Sacramento, CA: Caltrans. https://www.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983.

Department of Conservation (DOC). 2018. Farmland Mapping and Monitoring Program (FMMP) California Important Farmland Finder. Sacramento, CA: FMMP. https://maps.conservation.ca.gov/DLRP/CIFF/.

———. 2019 (May 21, 2021). Well Finder DOGGR GIS. Sacramento, California: DOC. https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.35333/33.95744/11.

Department of Toxic Substances Control (DTSC). (May 21, 2021, access date). Hazardous Waste and Substances Site List (Cortese). https://www.envirostor.dtsc.ca.gov/public/search.asp?PAGE=6&CMD=search&ocieerp=&business_name=&main_street_number=&main_street_name=&city=&zip=&county=&branch=&status=ACT%2CBKLG%2CCOM&site_type=CSITES%2CFUDS&cleanup_type=&npl=&funding=&reporttype=CORTESE&.

Department of Water Resources (DWR). 2021. Basin Prioritization. Sacramento, CA: DWR. https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization.

———. 2006 (January 20). San Jacinto Groundwater Basin. Sacramento, CA: DWR. https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/8_005_SanJacinto.pdf.

Earthwise Arborists (Earthwise) (June 29). 2021. Harley Knox Tree Inventory and Evaluation. Placentia, CA: Earthwise.

Eastern Municipal Water District (EMWD). (May 24, 2021, access date). Sustainable Groundwater Management Act. Perris, CA: EMWD. https://www.emwd.org/post/sustainable-groundwater-management-act.

———. 2021a (June). Eastern Municipal Water District 2020 Urban Water Management Plan – Final. Perris, CA: EMWD. https://www.emwd.org/sites/main/files/file-attachments/urbanwatermanagementplan_0.pdf?1625160721

———. 2021b (January). EMWD Perris Valley Regional Water Reclamation Facility. Perris, CA: EMWD. https://www.emwd.org/sites/main/files/file-attachments/pvrwrffactsheet.pdf.

Federal Aviation Administration (FAA). 2020 (May 20, 2021, access date). Notification of Proposed Construction or Alteration on Airport Part 77 - Central Region. Washington, DC: FAA. https://www.faa.gov/airports/central/engineering/part77/#NewRule.

Federal Emergency Management Agency (FEMA). 2014 (May 20, 2021, access date). National Flood Hazard Layer (Official). Washington, DC: FEMA. https://msc.fema.gov/portal/search?AddressQuery=220%20East%20Nance%20Street%2C%20Perris%2C%20CA#searchresultsanchor.

Hazard Management Consulting (HMC). 2021a (March 16). Phase I Environmental Site Assessment 280 and 25264 East Nance Street and Assessor's Parcel Numbers: 302-100-021, Perris, California 92571. San Clemente, CA: HMC.

———. 2021b (June 17). Limited Soil Investigation Report. 280 and 25264 Nance Street and APN 302100031, Perris California 92571. San Clemente, CA: HMC.

NorCal Engineering. 2021 (June 10). Geotechnical Investigation Proposed Warehouse Development 220 to 280 East Nance Street Perris, California. Los Alamitos, CA: NorCal Engineering.

Perris, City of. 2021 (May 11). Perris Municipal Code for the City of Perris, California. Perris, CA: the City. https://library.municode.com/ca/perris/codes/code_of_ordinances?nodeId=PEMUCOPECA.

_____. 2020. Active Transportation Plan. Perris. CA: the City. https://perrisatplan.com/wp-content/uploads/2020/12/SCAG_DCPI_AT_Plan_Perris_Final_with_Resolution_compressed.pdf.

_____. 2016. Perris General Plan Safety Element. Perris, CA: the City. https://www.cityofperris.org/home/showdocument?id=465.

_____. 2012a (January 10). Perris Valley Commerce Center Specific Plan (as amended through January 2022). Perris, CA: the City.

———. 2012b (January 10). Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (State Clearinghouse No. 2009081086). Perris, CA: the City.

———. 2008 (June). North Perris Road and Bridge Benefit District Analysis Report. Perris, CA: the City. https://docplayer.net/173116091-North-perris-road-and-bridge-benefit-district.html.

———. 2005a (as amended through 2016). Comprehensive General Plan 2030. Perris, CA: the City. http://www.cityofperris.org/city-hall/general-plan.html.

———. 2005b (April 26). Draft Environmental Impact Report, City of Perris General Plan 2030 (State Clearinghouse #2004031135). Perris, CA: the City. http://www.cityofperris.org/ city-hall/general-plan.html.

Riverside, County of. 2018 (July). Multi-Jurisdictional Local Hazard Mitigation Plan. Riverside, CA: the County. https://www.rivcoemd.org/Portals/0/FINAL%20PUBLIC%20VERSION%20Riv_Co_%202018%20Multi%20Jurisdictional%20Local%20Hazard%20Mitigation%20Plan.pdf.

_____. 2015 (December 8). County of Riverside General Plan: Multipurpose Open Space Element. Riverside, California: the County. https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/elements/OCT17/Ch05_MOSE_120815.pdf?ver=2017-10-11-102103-833.

_____. 2016 (December 6). County of Riverside General Plan Safety Element. Riverside, California: the County. https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/elements/OCT17/Ch06_Safety_DEC2016.pdf?ver=2017-10-06-093651-757.

Riverside County Airport Land Use Commission (RCALUC). 2014 (November 13). March Air Reserve Base / Inland Port Airport Land Use Compatibility Plan. Riverside, CA: RCALUC. http://www.rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700.

Riverside County Sheriff's Department (RCSD). (April 29, 2021, access date). Perris Sheriff's Station. https://www.riversidesheriff.org/746/Perris-Station.

Riverside County Transportation Authority (RTA). 2021. Personal Correspondence (Phone Call) Between Lauren from T&B and Mauricio from RTA.

Southern California Association of Governments (SCAG). 2020. Connect SoCal Appendix: Current Context Demographics and Growth Forecast. Los Angeles, CA: SCAG. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579.

———. 2019 (May). Profile of the City of Perris. Los Angeles, CA: SCAG. https://scag.ca.gov/sites/main/files/file-attachments/perris_localprofile.pdf?1606013516.

Thienes Engineering, Inc. (Thienes). 2021 (December 1). Project Specific Preliminary Water Quality Management Plan (P-WQMP) for: P21-00006 Harley Knox Commerce Center 25264 Nance Street Perris, California 92571 APNs: 302-100-020, -030 and -031. La Mirada, California: Thienes.

_____. 2021 (December 1). Preliminary Hydrology Calculations for Harley Knox Commerce Center Nance Street Perris, CA. La Mirada, California: Thienes.

Urban Crossroads. 2022a (March 31). Harley Knox Commerce Center Air Quality Impact Analysis, City of Perris. Costa Mesa, CA: Urban Crossroads.

_____. 2022b (March 31). Harley Knox Commerce Center Mobile Source Health Risk Assessment, City of Perris. Costa Mesa, CA: Urban Crossroads.

_____. 2022c (March 31). Harley Knox Commerce Center Energy Analysis, City of Perris. Costa Mesa, CA: Urban Crossroads.

_____. 2022d (March 31). Harley Knox Commerce Center Greenhouse Gas Analysis, City of Perris. Costa Mesa, CA: Urban Crossroads.

_____. 2022e (April 1). Harley Knox Commerce Center Noise Impact Analysis, City of Perris. Costa Mesa, CA: Urban Crossroads.

_____. 2022f (March 23). Harley Knox Commerce Center (DPR 21-00006) Trip Generation Assessment, City of Perris. Costa Mesa, CA: Urban Crossroads.

_____. 2022g (March 23). VMT Scoping Form for Land Use Projects. City of Perris. Costa Mesa, CA: Urban Crossroads.

Val Verde Unified School District (VVUSD). 2018 (April 29, 2021, access date). School Attendance Boundary Maps. Perris, CA: VVUSD. https://www.valverde.edu/en-US/attendance-boundary-maps-632a4f64.