

# FINAL ENVIRONMENTAL IMPACT REPORT

## State Clearinghouse Number 2021050021

for

### Perris Valley Commerce Center Specific Plan Amendment Number 13 (SPA19-05287) & Development Plan Review (DPR 19-00012)

*Lead Agency:*

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**March 2022**

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Appendix A - Draft EIR

## 1.0 INTRODUCTION

The Final Environmental Impact Report (Final EIR) for the proposed Perris Valley Commerce Center Specific Plan (PVCCSP) Amendment Number 13 (SPA19-05287) and Development Plan Review (DPR 19-00012) Project (proposed Project) has been prepared in accordance with the California Environmental Quality Act (CEQA), the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines), and the City of Perris' policies for implementing CEQA.

The following is an excerpt from the State CEQA Guidelines Section 15132 that states: "The Final EIR shall consist of:

- (a) Environmental Impact Reports shall contain the information outlined in this article, but the format of the document may be varied. Each element must be covered, and when these elements are not separated into distinct sections, the document shall state where in the document each element is discussed.
- (b) The EIR may be prepared as a separate document, as part of a general plan, or as part of a project report. If prepared as a part of the project report, it must still contain one separate and distinguishable section providing either analysis of all the subjects required in an EIR or, as a minimum, a table showing where each of the subjects is discussed. When the Lead Agency is a state agency, the EIR shall be included as part of the regular project report if such a report is used in the agency's existing review and budgetary process.
- (c) Draft EIRs shall contain the information required by Sections 15122 through 15131. Final EIRs shall contain the same information and the subjects described in Section 15132.
- (d) No document prepared pursuant to this article that is available for public examination shall include a "trade secret" as defined in Section 6254.7 of the Government Code, information about the location of archaeological sites and sacred lands, or any other information that is subject to the disclosure restrictions of Section 6254 of the Government Code.

The Final EIR includes all of these required components.

In accordance with Section 15088 of the State CEQA Guidelines, the City of Perris, as the lead agency for the proposed Project, has evaluated the comments received on the Draft EIR (DEIR), State Clearinghouse No. 2021050021, and has prepared responses to the comments received. The preceding Table of Contents provides of a list of all persons, organizations, and public agencies commenting on the DEIR during the 45-day Draft EIR public review period. Section 2.0 includes the Responses to Comments received by the City of Perris on the DEIR. It should be noted that responses to comments also resulted in various editorial clarifications and corrections to the original DEIR text. Added or modified text is shown in Section 3.0, Errata, by underlining (example) while deleted text is shown by striking (~~example~~). The additional information, corrections, and clarifications are not considered to substantively affect the conclusions within the EIR. This Response to Comments document is part of the Final EIR, which includes the EIR pursuant to Section 15132 of the State CEQA Guidelines.

After review and discussion by City staff and the Planning Commission, responses to comments will be sent to commenting agencies and individuals. This satisfies the requirement of Section 21092.5 of CEQA to send responses to the public agency comments received on the DEIR at least 10 days prior to Project approval. This document includes responses to all written and verbal comments received on the DEIR.

## BACKGROUND

On May 5, 2021, the City of Perris distributed a Notice of Preparation (NOP) informing the public

and public agencies of its decision to prepare an environmental impact report (EIR) for the proposed Project. The City notified the State Clearinghouse, related agencies, other government agencies and surrounding property owners within a 300-foot radius from the Project site boundaries. The 30-day NOP period for the proposed Project ran from May 5 to June 4, 2021.

On May 19, 2021, the City of Perris held a duly noticed public scoping meeting regarding the preparation of the EIR to discuss and hear from the public on the potential environmental impacts, which meeting was publicly noticed by an agenda posting and a notice to surrounding property owners within a 300-foot radius from the Project site boundaries, at least ten (10) days prior to the public meeting.

Between December 29, 2021 and February 11, 2022, the State-mandated 45-day public review period for the Draft Project EIR (DEIR) took effect, which was publicly noticed by a publication in a newspaper of general circulation, notice to owners within 300 feet of the Project site boundaries, related agencies and government agencies, and other interested parties, copies of the DEIR were sent to the State Clearinghouse, a copy placed at the City of Perris Planning Department counter at City Hall and a copy placed at the Cesar E. Chavez Library located at 163 E. San Jacinto in the City of Perris..

Written comments are provided and responded to through the Response to Comments as part of the Final EIR and the Response to Comments shall be distributed to all public agencies and other interested parties that submitted comments on the DEIR at least 10 days prior to certification of the Final Project EIR (Final EIR) in accordance with CEQA.

No evidence of new significant impacts, as defined by CEQA Guidelines Section 15088.5, have been received by the County after circulation of the DEIR which would require re-circulation.

The DEIR for the proposed Project, dated December 2021 and Final EIR for the proposed Project, dated February 2021 provide an assessment of the environmental impacts associated with the proposed Project and have been prepared in accordance with CEQA, Public Resources Code Section 21000 *et seq.*, and State regulations in Title 14 of the California Code of Regulations, Section 15000 *et seq.*

As set forth in more detail in the Responses to Comments and Errata, none of the clarifications or amplifications set forth herein change the significance conclusions presented in the DEIR or substantially alters the analysis presented for public review. Furthermore, the DEIR circulated for public review was fully adequate under CEQA such that meaningful public review was not precluded. Thus, the clarifications provided in the Responses to Comments and Errata do not constitute significant new information that might trigger recirculation of the DEIR. Comments on the DEIR received by the City of Perris during the 45-day public review period from the following organizations are addressed in Section 2.0:

- A1 – Mitchell M. Tsai on Behalf of SWRCC (2-7-2022)
- A2 - Mitchell M. Tsai on Behalf of SWRCC (2-16-2022)
- A3 – Mitchell M. Tsai on Behalf of SWRCC (3-1-22)
- B – Blum, Collins, & Ho on Behalf of GSEJA (2-4-2022)
- C – Lozeau Drury on Behalf of SAFER (2-4-2022)
- D – Adam Salcido (2-4-2022)
- E – Southern California Association of Governments (2-8-2022)

## **2.0 COMMENTS AND RESPONSES**

### **Comment Letter A1**

Mitchell M. Tsai, Attorneys for the Southwest Regional Council of Carpenters (SWRCC) (2-7-2022)

(Pages 1 through 5 of this Letter are provided below. The entirety of the Letter, including all Exhibits and Attachments, is provided in the link below:

<https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review>)

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**VIA E-MAIL**

February 7, 2022

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RE: Perris Valley Commerce Center Specific Plan, Amendment No. 10 & Development Plan Review 19-00012

Dear Ms. Power,

On behalf of the Southwest Regional Council of Carpenters (“**SWRCC**” or “**Southwest Carpenters**”), my Office is submitting these comments on the City of Perris’ (“**City**” or “**Lead Agency**”) Draft Environmental Impact Report (“**DEIR**”) for the Perris Valley Commerce Center Specific Plan, Amendment No. 10 & Development Plan Review 19-00012 (“**Project**”).

The Southwest Carpenters is a labor union representing more than 50,000 union carpenters in six states and has a strong interest in well-ordered land use planning and addressing the environmental impacts of development projects.

Individual members of the Southwest Carpenters live, work and recreate in the City and surrounding communities and would be directly affected by the Project’s environmental impacts.

The Southwest Carpenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

SWRCC incorporates by reference all comments raising issues regarding the EIR submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City*

*of Woodland* (2014) 225 Cal. App. 4th 173, 191 (finding that any party who has objected to the Project’s environmental documentation may assert any issue timely raised by other parties).

Moreover, SWRCC requests that the Lead Agency provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act (“**CEQA**”), Cal Public Resources Code (“**PRC**”) § 21000 *et seq*, and the California Planning and Zoning Law (“**Planning and Zoning Law**”), Cal. Gov’t Code §§ 65000–65010. California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

The City should require the Applicant provide additional community benefits such as requiring local hire and use of a skilled and trained workforce to build the Project. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training program or who are registered apprentices in an apprenticeship training program approved by the State of California.

Community benefits such as local hire and skilled and trained workforce requirements can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

[A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Skilled and trained workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the UC Berkeley Center for Labor Research and Education concluded:

. . . labor should be considered an investment rather than a cost – and investments in growing, diversifying, and upskilling California’s workforce can positively affect returns on climate mitigation efforts. In other words, well trained workers are key to delivering emissions reductions and moving California closer to its climate targets.<sup>1</sup>

Recently, on May 7, 2021, the South Coast Air Quality Management District found that the “[u]se of a local state-certified apprenticeship program or a skilled and trained workforce with a local hire component” can result in air pollutant reductions.<sup>2</sup>

Cities are increasingly adopting local skilled and trained workforce policies and requirements into general plans and municipal codes. For example, the City of Hayward 2040 General Plan requires the City to “promote local hiring . . . to help achieve a more positive jobs-housing balance, and reduce regional commuting, gas consumption, and greenhouse gas emissions.”<sup>3</sup>

In fact, the City of Hayward has gone as far as to adopt a Skilled Labor Force policy into its Downtown Specific Plan and municipal code, requiring developments in its Downtown area to requiring that the City “[c]ontribute to the stabilization of regional construction markets by spurring applicants of housing and nonresidential developments to require contractors to utilize apprentices from state-approved, joint

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<sup>1</sup> California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* <https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf>.

<sup>2</sup> South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10>.

<sup>3</sup> City of Hayward (2014) Hayward 2040 General Plan Policy Document at p. 3-99, *available at* [https://www.hayward-ca.gov/sites/default/files/documents/General\\_Plan\\_FINAL.pdf](https://www.hayward-ca.gov/sites/default/files/documents/General_Plan_FINAL.pdf).



labor-management training programs, . . .”<sup>4</sup> In addition, the City of Hayward requires all projects 30,000 square feet or larger to “utilize apprentices from state-approved, joint labor-management training programs.”<sup>5</sup>

Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.<sup>6</sup>

In addition, local hire mandates as well as skill training are critical facets of a strategy to reduce vehicle miles traveled. As planning experts Robert Cervero and Michael Duncan noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents.<sup>7</sup> Some municipalities have tied local hire and skilled and trained workforce policies to local development permits to address transportation issues. As Cervero and Duncan note:

In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing.” The city’s First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When

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<sup>4</sup> City of Hayward (2019) Hayward Downtown Specific Plan at p. 5-24, *available at* <https://www.hayward-ca.gov/sites/default/files/Hayward%20Downtown%20Specific%20Plan.pdf>.

<sup>5</sup> City of Hayward Municipal Code, Chapter 10, § 28.5.3.020(C).

<sup>6</sup> California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* <https://cprroundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf>.

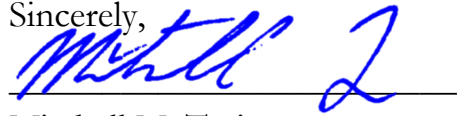
<sup>7</sup> Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? *Journal of the American Planning Association* 72 (4), 475-490, 482, *available at* <http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf>.

needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

The City should consider utilizing skilled and trained workforce policies and requirements to benefit the local area economically and mitigate greenhouse gas, air quality and transportation impacts.

If the City has any questions or concerns, feel free to contact my Office.

Sincerely,



Mitchell M. Tsai

Attorneys for the Southwest  
Regional Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).

**Responses to Comment Letter A1**

This letter provides a number of comments regarding the potential of submitting additional comments and requiring the applicant to provide additional community benefits such as requiring local hiring and using a skilled and trained workforce to build the Project. The commenter states that local hire mandates as well as skills training are critical facets of a strategy to reduce vehicle miles traveled. However, the comments in this letter do not question the content or conclusions of the DEIR. Therefore, no response in the FEIR to the comments in this letter is required or provided.

**Comment Letter A2**

Mitchell M. Tsai, Attorneys for Southwest Regional Council of Carpenters (SWRCC) (2-16-2022)

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**VIA E-MAIL**

February 16, 2022

Chantal Power, AICP Contract Planner  
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RE: Perris Valley Commerce Center Specific Plan, Amendment No. 10 & Development Plan Review 19-00012

Dear Ms. Power,

On behalf of the Southwest Regional Council of Carpenters ("**SWRCC**" or "**Southwest Carpenters**"), my Office is submitting these comments on the City of Perris' ("**City**" or "**Lead Agency**") Draft Environmental Impact Report ("**DEIR**") for the Perris Valley Commerce Center Specific Plan, Amendment No. 10 & Development Plan Review 19-00012 ("**Project**").

The Southwest Carpenters would like to express their support for this Project. After received clarification and further information about this Project, SWRCC believes that this Project will benefit the environment and the local economy by utilizing a local skilled and trained workforce and will be built utilizing protocols that will protect worker health and safety.

If the City has any questions or concerns, feel free to contact my Office.

Sincerely,  


Mitchell M. Tsai  
Attorneys for the Southwest  
Regional Council of Carpenters

**Responses to Comment Letter A2**

This letter expresses the support of the Southwest Regional Council of Carpenters for the proposed Project. The comments in this letter do not question the content or conclusions of the DEIR. Therefore, no response in the FEIR to the comments in this letter is required or provided.

**Comment Letter A3**

Mitchell M. Tsai, Attorneys for the Southwest Regional Council of Carpenters (SWRCC) (3-1-2022)

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**VIA E-MAIL**

March 1, 2022

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RE: Perris Valley Commerce Center Specific Plan, Amendment No. 10 & Development Plan Review 19-00012

Dear Ms. Power,

On behalf of the Southwest Regional Council of Carpenters ("**SWRCC**" or "**Southwest Carpenters**"), my Office is submitting these comments on the City of Perris' ("**City**" or "**Lead Agency**") Draft Environmental Impact Report ("**DEIR**") for the Perris Valley Commerce Center Specific Plan, Amendment No. 10 & Development Plan Review 19-00012 ("**Project**").

The Southwest Carpenters would like to express their support for this Project and withdraw their prior February 7 and February 16, 2022 comment letters. After received clarification and further information about this Project, SWRCC believes that this Project will benefit the environment and the local economy by utilizing a local skilled and trained workforce and will be built utilizing protocols that will protect worker health and safety.

If the City has any questions or concerns, feel free to contact my Office.

Sincerely,

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Mitchell M. Tsai  
Attorneys for the Southwest  
Regional Council of Carpenters



**Responses to Comment Letter A3**

This letter expresses the support of the Southwest Regional Council of Carpenters for the proposed Project. The comments in this letter do not question the content or conclusions of the DEIR. Therefore, no response is required or provided in the FEIR for this letter.

**Comment Letter B**

Blum, Collins, & Ho, LLP on Behalf of Golden State Environmental Justice Alliance (GSEJA) (2-4-2022)

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**AON CENTER**  
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February 4, 2022

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*VIA EMAIL TO:*  
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*Subject: Comments on PVCC Sp. Amendment No. 13/Development Plan Review NO. 19-00012 EIR (SCH NO. 2021050021)*

To whom it may concern:

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed PVCC SP Amendment No. 13/DPR No. 19-00012 project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance (GSEJA). Also, GSEJA formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

B1

### **1.0 Summary**

The project proposes the construction and operation of an approximately 347,918 square-foot (sf) light-industrial warehouse building with 8,000 square feet of office area on a 16-acre (gross) site. The building proposes 49 truck/trailer loading dock doors, 82 truck/trailer parking spaces and 128 passenger vehicle parking spaces. A Specific Plan Amendment is proposed to change the project site’s land use designation from “Commercial” to “Light Industrial.”

B2

### **2.0 Introduction**

*2.2.2 - Uses of this EIR*

*Effects Not Found to be Significant - Population and Housing*

B3

The EIR concludes that impacts to population and housing will not be significant because the project “would not attract a substantial number of people to the area” without providing any quantified analysis or meaningful evidence to support this claim. The EIR states that the project may “indirectly contribute to population growth within the City by creating additional employment both during construction and operation. However, it is *anticipated* that the *majority* of new jobs would be filled by workers who already reside in the Project *vicinity* and that the Project would not attract a *significant* number of new residents to the City.” This uncertain language is not supported by any information such as a calculation of the jobs generated by the project or evidence that the population is qualified for or interested in work in the industrial sector. There is also no analysis of projects approved, proposed, or “in the pipeline” of the PVCCSP or the City to demonstrate that the combined workforce of all projects does not exceed the growth estimates analyzed by the PVCCSP EIR. Relying on the entire labor force within an undefined distance, potentially the greater SCAG region, to fill the project’s construction and operational jobs will increase VMT and emissions during all phases of construction and operations and a revised EIR must be prepared to account for longer worker trip distances. SCAG’s Employment Density Study<sup>1</sup> provides the following applicable employment generation rates for Riverside County:

B3  
cont.

Office: 1 employee per 481 square feet  
Warehouse: 1 employee per 581 square feet

Applying these ratios results in the following calculation:

Office:  $8,000 \text{ sf} / 481 \text{ sf} = 17$

Warehouse:  $339,918 \text{ sf} / 581 = 586$

Total: 603 employees

Utilizing SCAG’s Employment Density Study ratios, the proposed project will generate 603 employees. The EIR utilizes uncertain and misleading language which does not provide any meaningful analysis of the project’s population and employment generation. In order to comply with CEQA’s requirements for meaningful disclosure, a revised EIR must be prepared to provide an accurate estimate of employees generated by all uses of the proposed project. It must also provide demographic and geographic information on the location of qualified workers to fill these positions.

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<sup>1</sup> SCAG Employment Density Study  
<http://www.mwcog.org/file.aspx?A=QTTITR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6lXOU%3D>

SCAG's Connect SoCal Demographics and Growth Forecast<sup>2</sup> notes that the City will add 10,300 jobs between 2016 - 2045. Utilizing SCAG's Employment Density Study calculation of 603 employees, the project represents 5.9% of the City's employment growth from 2016 - 2045. SCAG's Growth Forecast notes that the City's population will increase by 46,100 residents between 2016 - 2045. Utilizing SCAG's Employment Density Study calculation of 603 employees, the project represents 1.3% of the City's population growth from 2016 - 2045. A single project accounting for this amount of the projected employment and/or population over 29 years represents a significant amount of growth. A revised EIR must be prepared to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" to determine if the project will exceed SCAG's employment growth forecast for the City. Additionally, the revised EIR must also provide demographic and geographic information on the location of qualified workers to fill these positions in order to provide an accurate environmental analysis.

B3  
cont.

#### **4.2 Air Quality, 4.5 Energy, 4.6 Greenhouse Gas Emissions**

SWAPE will supplement this letter with its air quality analysis and technical commentary.

B4

The EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. This is especially significant as the surrounding community is highly burdened by pollution. According to CalEnviroScreen 4.0<sup>3</sup>, CalEPA's screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project's census tract (6065042620) ranks worse than 69% of the rest of the state overall in environmental burdens. The surrounding community, including the mobile home residences adjacent to the east, bears the impact of multiple sources of pollution and is more polluted than average on every pollution indicator measured by CalEnviroScreen. For example, the project census tract ranks in the 98th percentile for ozone burden, the 53rd percentile for PM 2.5 burden, and the 48th percentile for diesel particulate matter. All of these environmental factors are typically attributed to heavy truck activity in the area, which is demonstrated by the census tract ranking in the 82nd percentile for traffic impacts. Traffic impacts represent the vehicles in a specified area, resulting in human exposures to chemicals that are released into the air by vehicle exhaust, as well as other effects related to large concentrations of motor vehicles<sup>4</sup>.

B5

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<sup>2</sup> SCAG Connect SoCal Demographics and Growth Forecast adopted September 3, 2020  
[https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_demographics-and-growth-forecast.pdf?1606001579](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579)

<sup>3</sup> CalEnviroScreen 4.0 <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>

<sup>4</sup> OEHHA CalEnviroScreen Report  
<https://oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf>

Further, the census tract is a diverse community including 69% Hispanic, 13% African-American, and 7% Asian-American residents, which are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 75% of the census tract over age 25 has not attained a high school diploma, which is an indication that they may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 91st percentile for incidence of cardiovascular disease, 66th percentile for incidence of asthma, and 63rd percentile for babies born at a low birth weight.

B5  
cont.

Additionally, the project's census tract (6065042620) is identified as a SB 535 Disadvantaged Community<sup>5</sup>, which is not discussed or presented for analysis in the EIR.

There are multiple discrepancies in MT CO<sub>2</sub>e calculations for project construction and operations in the Air Quality analysis compared to the Greenhouse Gas Emissions analysis. For example, in the Air Quality analysis, the MT CO<sub>2</sub>e for project construction is 14,454 MT CO<sub>2</sub>e (summer) and 14,123 MT CO<sub>2</sub>e (winter). The GHG analysis finds that the total mitigated MT CO<sub>2</sub>e for project construction is 1,164 MT CO<sub>2</sub>e. The GHG analysis has reduced the construction MT CO<sub>2</sub>e by approximately 91% without an explanation for the reductions given or the manner in which the reductions were achieved.

B6

The Air Quality analysis concludes the MT CO<sub>2</sub>e for project operations is 12,545 MT CO<sub>2</sub>e (summer) and 12,252 MT CO<sub>2</sub>e (winter). The GHG analysis finds that the total mitigated MT CO<sub>2</sub>e for project operations is 2,501 MT CO<sub>2</sub>e. The GHG analysis has reduced the operations MT CO<sub>2</sub>e by approximately 80% without an explanation for the reductions given or the manner in which the reductions were achieved.

There is no information given regarding the vast discrepancies between these calculations. The EIR is internally inconsistent and not adequate as an informational document. These reductions serve to skew emissions downwards, specifically below the 10,000 MTCO<sub>2</sub>e significance threshold for industrial projects. Additionally, modeling errors such as those noted in the Energy, Air Quality, and Transportation discussions must be corrected in order to adequately analyze the project's GHG emissions. A revised EIR must be prepared to adequately and accurately present the project's significant Air Quality and GHG emissions and include a finding of significance.

B7

The State of California lists three approved energy compliance modeling softwares<sup>6</sup> for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an

<sup>5</sup> OEHHA SB 535 Census Tracts <https://oehha.ca.gov/calenviroscreen/sb535>

<sup>6</sup> 2019 Building Energy Efficiency Standards Approved Computer Compliance Programs, California Energy Commission. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency-2>

approved software. The CalEEMod energy calculations in the EIR do not comply with the 2019 Building Energy Efficiency Standards and under reports the project's potentially significant GHG and Energy impacts to the public and decision makers. Since the EIR did not accurately or adequately model the energy impacts in compliance with Title 24, a finding of significance must be made. A revised EIR with modeling in one of the approved software types must be circulated for public review in order to adequately analyze the project's potentially significant environmental impacts. This is vital as the EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not one of the approved softwares.

B7  
cont.

#### 4.8 Land Use and Planning

The EIR concludes the project is consistent with Land Use Element Policy III.A: Accommodate diversity in the local economy because "the Project will provide dozens of new short-term jobs during construction and from 239 to 738 long-term employment for warehouse and office workers (see page 4.8- 12)." However, page 4.8-12 does not include any information regarding the project's employment generation. The EIR must be revised to include this information in order to provide meaningful supporting evidence for the consistency determination.

B8

The EIR has not provided any consistency analysis with SCAG's 2020-2045 Connect SoCal RTP/SCS. The project requires a change in land use designation to proceed, which indicates that it is not consistent with the analysis provided in Connect SoCal. Due to errors in modeling as noted throughout this comment letter, the proposed project has significant potential for inconsistency with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing climate. Also as noted in the GHG discussion, the summer/winter GHG analyses exceed the GHG emissions thresholds, resulting in a significant impact. The EIR must be revised to include revised Air Quality/HRA, Energy, and GHG modeling in order to accurately analyze potential inconsistency with the 2020-2045 RTP/SCS document.

B9

Additionally, Appendix H: Project Plans state that the project proposes 50.9% lot coverage while PVCC SP permits a maximum 50% lot coverage. The project does not comply with the development standards and requires either an additional amendment to the PVCC SP or a variance to proceed. This is not described in the EIR. The EIR must be revised to discuss and analyze the project's inconsistency with the PVCC SP development standards.

B10

The Project requires a Specific Plan Amendment to change to change the site's land use designation from "Commercial" to "Light Industrial." The EIR concludes that the project will not result in any significant impacts because "Based on the policy direction contained in the City's General Plan and the PVCCSP, Project impacts related to consistency with the local General Plan will be less than significant." The EIR discusses the policy emphasis that "The PVCCSP is

B11

designed to encourage a mix of land uses that provide interrelated opportunities.” Based on Figure 4.8-2: Existing and Proposed Zoning Classification, all corner properties at the intersection of Ramona Expressway and Perris Boulevard are currently designated as Commercial. It is clear that the PVCC SP mix of land uses designated the project site as Commercial to support the surrounding industrial uses. Changing the site’s designation to Light Industrial will further homogenize the area with warehousing/distribution centers, reduce the mix of land uses in the PVCC SP, and eliminate a site that could provide supporting commercial services to reduce local VMT. The EIR has excluded this information from analysis and must be revised to adequately and accurately describe the policy intent and mix of land uses in the PVCC SP. It must also provide a quantified analysis of the project’s additional growth beyond the buildout scenario for Planning Area 3 of Table LU-28: Building Area by Land Use Designation, Table LU-29: General Plan Population Projections, and Table LU-30: General Plan Employment Projections of the City’s General Plan Land Use Element, including all cumulative development and projects “in the pipeline”.

B11  
cont.

#### **4.10 Transportation**

The VMT analysis concludes the project will generate less than significant VMT impacts because it is located in a Low VMT TAZ. The VMT analysis does not adequately or accurately represent the VMT impacts of the proposed project and a revised EIR must be prepared to reflect this. The operational nature of industrial/warehouse uses involves high rates of truck/trailer VMT due to traveling from large regional distribution centers to smaller industrial parks and then to their final delivery destinations. Table 4.2 Trip Summary of the Air Quality Appendix CalEEMod output sheets indicates that the project will generate approximately 2,647,522 annual VMT ( $2,647,522 / 365 \text{ days} = 7,253 \text{ daily total VMT}$ ). This is exponentially higher than the VMTs reported in Appendix N. The project’s truck/trailer activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude the truck/trailer activity from VMT analysis. A revised EIR must be prepared to reflect a quantified VMT analysis that includes truck/trailer activity to adequately and accurately analyze the potentially significant project transportation impacts.

B12

#### **5.0 Alternatives**

The Alternatives are not adequately described within the EIR. Alternative 1: Commercial Use proposes a Gas Station with 4,500 square foot convenience store and 16 vehicle fueling positions, 2,200 square foot fast-food restaurant with drive-through window use, and a 1,374 unit self-storage facility (described as 200,000 square foot self-storage facility in Appendix N). However, Table 2.0-2: Land Uses within the PVCC SP states that self-storage/mini-storage is a prohibited use in the Commercial designation. This Alternative requires an amendment to the PVCC SP to proceed,

B13



which is not described or analyzed in the EIR. The EIR must be revised to include this information for discussion and analysis.

B13  
cont.

**Conclusion**

For the foregoing reasons, GSEJA believes the EIR is flawed and a revised EIR must be prepared for the proposed project and recirculated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

B14

Sincerely,

A handwritten signature in black ink, appearing to be 'Gary Ho', with a stylized flourish at the end.

Gary Ho  
Blum Collins & Ho, LLP

**Responses Comment Letter B**

- B-1** This paragraph states that the commenter is submitting comments on behalf of the GSEJA. This comment does not question the content or conclusions of the DEIR. As requested, the GSEJA will be included in future notices regarding the project and its CEQA documentation.
- B-2** This comment summarizes the major characteristics of the proposed Project. This comment does not question the content or conclusions of the DEIR.
- B-3** To begin, the Project is an industrial warehouse so the commenter's statement about the project generating substantial new population or housing is incorrect. However, new sources of employment can sometimes induce indirect growth in a community as some percentage of project workers may choose to move into that community from outlying areas. This condition is explained in the DEIR on page 3-8 of the Project Description as follows:

*It is estimated the Project could generate from 232 to 717 new employees based on industry standards. New employment generation figures for the proposed warehouse use range from 1 employee/1,500 square feet (SF) per the PVCCSP and up to 1 employee/485 square feet per the County Airport Land Use Commission. Therefore, the Project could generate from 232 employees (347,918 total SF divided by 1500 SF/employee) up to 717 employees (347,918 total SF divided by 485 SF/employee). However, these gross numbers do not take into account ALUC land use restrictions which may restrict the total employment to the lower end of this range. As a conservative "worst case" assumption, the Project warehouse will operate 24 hours per day 7 days per week.*

The commenter fails to acknowledge this information in the DEIR based on generation rates in the PVCCSP and Airport Land Use Commission (ALUC) correspondence. The commenter instead cites SCAG's Employment Density Study which indicates the Project could generate 603 employees. This estimate is still within the range of employment indicated in the DEIR as outlined above.

The commenter then goes on to state that the DEIR... "must also provide demographic and geographic information on the location of qualified workers to fill these positions." There is no requirement in the CEQA Statutes, State CEQA Guidelines, or case law that requires that an EIR must identify those specific future project characteristics. The actual number of employees who move into a community for a new job, and their specific housing choices, would necessarily vary by size and type of warehouse building, the actual use or uses housed in that building, and individual employee's choices about where to live based on a new job. It is just as likely that a worker at another warehouse might choose to apply to and be hired by the new warehouse. It is clearly overly speculative and difficult if not impossible to accurately predict these types of market-driven characteristics of development. In addition, the information is not relevant to the determination of environmental impacts under CEQA.

Finally, the commenter calculates the Project would represent 1.3% of the City's population growth estimated by Southern California Association of Governments (SCAG) for 2016 to 2045. However, the commenter makes this estimate assuming all new 603 project workers would become City residents. While some workers might make this choice, the estimate is clearly overly speculative and not supported by any empirical data provided by the commenter.

Even using the commenter's excessive estimate, the commenter has not demonstrated that the project will exceed SCAG's employment growth forecast for the City.

- B-4** This is not a specific comment on the CEQA document, simply a statement that additional comments are to follow. Because the comments have not been submitted during the 45-day DEIR public review period, no response can be provided at this time.
- B-5** Pursuant to CEQA, the Project's physical impacts on the environment were evaluated in the IS/MND using State CEQA Guidelines Appendix G thresholds as well as thresholds of significance adopted by other agencies with authority over affected resources (i.e., the SCAQMD). Environmental justice is not an environmental impact required to be evaluated or considered pursuant to CEQA, per State CEQA Guidelines Article 9. Contents of Environmental Impact Reports, Sections 15120 to 15132.

CalEnviroScreen is a screening methodology developed by the California Office of Environmental Health Hazard Assessment that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. The model uses 21 statewide indicators to characterize both pollution burden and population characteristics. The exposure indicators in the model are ozone, PM<sub>10</sub>, PM<sub>2.5</sub>, drinking water, children's lead risk from housing, pesticide use, toxic releases, and traffic. The environmental effects indicators in the model are cleanup sites, groundwater threats, hazardous waste facilities/generators, impaired water bodies, and solid waste sites/facilities. As shown, the assessments in the model are based on much more than just air quality.

The commenter cites the CalEnviroScreen ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> burden percentile estimates for the census tract in which the Project site is located. However, the comment does not state that CalEnviroScreen shows that the ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> burden estimates for the census tracts throughout the City of Perris are relatively consistent; even in areas where there are no warehouse projects. The comment also does not state that the ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> burden estimates for the census tracts located to the north of the City of Perris are slightly higher than those in Perris.

The commenter states that the ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> burden of the Project's census tract is typically attributed to heavy truck traffic in the area. The commenter states that this is demonstrated by the census tract's ranking for traffic impacts. This statement ignores the fact that air pollutant emissions are generated by nearly every use and property within Perris, Riverside County, and the entire South Coast Air Basin, and that there are more passenger vehicles (cars and light trucks) operating within Perris than there are heavy trucks.

The sources of individual criteria pollutants are discussed on pages 4.2-4 through 4.2-6 of the DEIR and pages 16 through 22 of the Perris and Ramona Warehouse Air Quality Impact Analysis, which is included as Appendix I1 to the DEIR. However, these discussions do not provide the contribution of each source of the individual pollutants. As discussed on page 2.4-4 of the DEIR, ozone is formed when VOCs and NO<sub>x</sub> react in the presence of ultraviolet sunlight. As shown on page 3.2-16 of the SCAQMD's 2016 AQMP Final Program EIR, the 2012 baseline emission inventory for VOC emissions was 33% from on-road vehicles, 25% from off-road vehicles, 20% from architectural coatings and consumer products, 17% from area sources, and 6% from point sources. The 2012 baseline emission inventory for NO<sub>x</sub> emissions was 56% from on-road vehicles, 32% from off-road vehicles, 7% from area sources, and 5% from point sources. The 2012 baseline emission inventory for PM<sub>2.5</sub> emissions was 42% from area sources, 22% from on-road vehicles, 13% from road dust, 12% from off-road vehicles, and 12% from point sources. This demonstrates that criteria pollutant emissions concentrations within the South Coast Air Basin and the City of Perris are based on many more sources than heavy truck traffic.

Nonetheless, the air quality analysis contained in the DEIR demonstrates that the Project would not result in environmental justice issues. The air quality analysis prepared for the Project provides an assessment of potential cumulative air quality impacts. The SCAQMD shares the responsibility with California Air Resources Board (CARB) for ensuring that all federal and state ambient air quality standards are achieved and maintained throughout the air basin. The SCAQMD has developed methodologies and thresholds of significance that are widely used throughout the air basin. SCAQMD staff has suggested in the cumulative significance methodologies contained in the CEQA Air Quality Handbook that the emissions-based thresholds be used to determine if a project's contribution to regional cumulative emissions is cumulatively considerable. These thresholds were used in the Air Quality Analysis to assess the significance of the Project specific and cumulative air quality impacts. Air quality impacts are basin-wide, and air quality is affected by all pollutant sources in the basin. Therefore, the ambient air quality measurements provided in the Air Quality Analysis provide a summary of basin-wide cumulative air quality impacts. As the individual Project thresholds are designed to help achieve attainment with cumulative basin-wide standards, they are also appropriate for assessing the Project's contribution to cumulative impacts.

As discussed on pages 4.2-16, and 4.2-22 through 4.2-24 of the DEIR in response to Threshold C, which questions whether the Project would expose sensitive receptors to substantial pollutant concentrations, the DEIR describes the localized significance threshold (LST) analysis utilized in determining these potential impacts.

DEIR page 4.2-22 states that, "LSTs were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities." The analysis in the DEIR further state that, "the Project was analyzed for its potential to result in significant health risk impacts resulting from short-term construction and long- term operational emissions" and that it was determined, "the Project would not exceed the SCAQMD LSTs during construction and operational activities."

The SCAQMD also recommends the preparation of a mobile source Health Risk Assessment (HRA) if a project is expected to generate or attract heavy-duty diesel trucks, which emit diesel particulate matter (DPM). The Project's Health Risk Assessment (HRA; DEIR Appendix I3) discusses the Project's potential impacts regarding DPM emissions, cancer risk, non-carcinogenic risk, residential exposure, worker exposure, and school children exposure. Because construction and operational activity would not result in an exceedance of the SCAQMD's DPM cancer risk exposure threshold of 10 in one million, or non-cancer risk threshold of 1.0, sensitive receptors would not be exposed to substantial DPM pollutant concentrations during Project construction or operation, and impacts would be less than significant (DEIR, pages 4.2-25 through 4.2-31.)

Thus, contrary to the commenter's statements, the DEIR does include analysis relevant to environmental justice issues as the LSTs utilized in determining potential impacts to sensitive receptors were developed in response to environmental justice concerns and the Project HRA assesses potential Project-related health risks to residents, workers, and school children.

- B-6** The commenter incorrectly states that there are discrepancies in the GHG emissions disclosed in the Air Quality analysis and the Greenhouse Gas Emissions analysis. The SCAQMD's thresholds of significance for air quality impacts are based on pounds per day whereas the SCAQMD's thresholds of significance for GHG emissions is based on metric tons per year. As such, the CO<sub>2</sub>e emissions shown in the CalEEMod calculation sheets in

the Perris and Ramona Warehouse Air Quality Impact Analysis (appendix I1 to the DEIR) are presented in pounds per day; not metric tons. The pounds per day metric (lb/day) is shown in the header to each emissions calculation results table in the CalEEMod results sheets. Although daily CO<sub>2</sub>e emission were calculated by CalEEMod for the evaluation of air quality impacts, these emissions are not used to determine the significance of GHG emissions. On the other hand, the CO<sub>2</sub>e emissions shown in the CalEEMod calculation sheets in the Perris and Ramona Warehouse Greenhouse Gas Analysis (appendix I2 to the DEIR) are presented in metric tons per year. This is shown in the header to each emissions calculation results table in the CalEEMod results sheets. Therefore, the DEIR correctly evaluates construction and operation air quality and greenhouse gas impacts using the appropriate metrics as established by SCAQMD guidelines and there are discrepancies between the analyses.

**B-7** Please see the Response B-6 regarding the calculation of GHG emissions for the analysis in the DEIR.

The energy models cited in the comment are not applicable to the CEQA process and are, in fact, used to demonstrate compliance with the Title 24 building energy efficiency standards, which is conducted prior to issuance of building permits. The DEIR utilizes CalEEMod, which is a statewide land use emissions computer model, recommend by the SCAQMD, designed to provide a uniform platform to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model quantifies indirect emissions from energy use, which incorporates Title 24 standards. As such, the DEIR appropriately quantified and disclosed the energy-related impacts associated with the proposed Project. There is no requirement of the DEIR to show specific compliance with 2019 Building Energy Efficiency Standards at this time as that will be a requirement prior to issuance of a building permit and verified by the City Building Division.

**B-8** The commenter states that DEIR page 4.8-12 does not include any information regarding the Project's employment generation so the EIR must be revised. However, the commenter failed to acknowledge that page 3-8 of the DEIR Project Description clearly estimates that the Project will generate 232 to 717 new employees depending on the generation rate used (see also Response B-3 above). This information is included in the consistency analysis of the project for General Plan Policy III.A in Table 4.8-5, which is on page 4.8-13 and which follows page 4.8-12 (see Section 3, Errata). Therefore, the land use and planning section of the DEIR does provide this information.

**B-9** As explained in the section cited by the commenter, the DEIR explains that the project does not meet the "regionally significant project" requirements outlined in State CEQA Guidelines Section 15206. Therefore, a direct comparison to SCAG's regional Connect SoCal goals is not required. However, in response to similar comments by SCAG, Section 3, Errata, of this FEIR provides a new Table 4.8-4, Project Consistency with SCAG Regional Goals.

**B-10** The commenter may be conflating gross versus net coverage. The Project applicant is proposing 347,918 total square feet of warehousing while the site is 16 gross acres (or 696,960 square feet). The lot coverage is 49.9% based on gross acreage, which is what is allowed in the PVCCSP. Therefore, no variance or Specific Plan Amendment for lot coverage is needed.

**B-11** The commenter fails to take into account the regulatory restrictions on the Project site (i.e., the southwest corner of Ramona and Perris) due to Airport Land Use Plan safety zones,

which is explained in detail in the DEIR Project Description. The DEIR explains that only 3.9 acres of the 16-acre site would allow retail commercial uses, which would result in a very limited commercial site - the other three corners of this intersection do not have the same land use restrictions. As also mentioned in the DEIR, there are also commercial uses to the east of the site, so there is no explicit need for additional commercial uses at the southwest corner of this intersection.

The commenter is incorrect, the DEIR does not need to revise the General Plan or PVCCSP buildout tables for land use, population, or employment changes represented by the project or all cumulative development and projects “in the pipeline”. General Plan buildout numbers are those based on the land uses identified in the General Plan Land Use Element at the time the General Plan and its EIR were prepared. Similarly, the PVCCSP building numbers are those based on the land uses outlined in the PVCCSP and its EIR at the time they were approved. The cumulative analysis in the PVCC SPA No. 13 EIR demonstrates the proposed Project will not make a significant contribution to any cumulatively considerable environmental impacts with project design and implementation of the recommended mitigation measures. To further support this, none of the previous PVCC SPAs (1-12) provided an updated revised buildout land use table for either the PVCCSP or the General Plan. Finally, there is no provision in the CEQA Statute or Guidelines requiring the revision of these types of forecasts from previous planning or CEQA documents when development plans and their CEQA documentation is subsequently processed. Eventually when the City’s General Plan is updated, the buildout forecasts for the land use plan at that time will reflect the most current estimates of future land uses, including population, housing, and employment.

**B-12** The reviewer’s comment that the “VMT analysis does not adequately or accurately represent the VMT impacts of the proposed project” is incorrect. The VMT (Vehicle Miles Traveled) analysis was prepared consistent with the Governor’s Office of Planning and Research’s (OPR) Technical Advisory and the City of Perris’ Transportation Impact Analysis Guidelines for CEQA (May 2020) adopted VMT guidelines that state that projects that locate in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT<sup>1</sup>. The Project site was found to be in a low VMT area consistent with the City of Perris’ VMT Scoping Form, from data derived from Riverside Transportation Analysis Model (RIVTAM). The Project site meets the low VMT area screening criteria and is therefore not required to perform further VMT analysis.

The reviewer’s comment that the VMT results reported in the project’s air quality analysis is “exponentially higher than the VMTs reported in Appendix N” is incorrect. The VMT analysis concluded that because the Project meets the City’s screening criteria and no further VMT analysis was performed. As no VMT analysis was performed, Appendix N did not include values the commenter is using as a basis for comparison.

Additionally, this comment incorrectly suggests that CEQA requires VMT to be assessed for heavy-duty trucks. CEQA does not require this. State CEQA Guidelines section 15064.3(a) defines VMT as “the amount and distance of **automobile** travel attributable to a project [emphasis added].” The Governor’s Office of Planning and Research’s Technical Advisory on Evaluating Transportation in CEQA (December 2018, page 4), which was used for the Project’s VMT Analysis, states that “automobile” refers to on-road passenger vehicles, specifically cars and light trucks. It does not include heavy-duty trucks, semi-trailers, construction equipment, or other commercial-type vehicles.

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<sup>1</sup> OPR’s Technical Advisory, Page 13

Many other agencies have also said, “OPR has clarified in the Technical Advisory and recent informational presentations that heavy-duty truck VMT is not required to be included in the estimation of a project’s VMT.”<sup>2</sup> (See also “[a]s such, VMT analysis of truck trips is not a prescribed method to assess [a]projects’ transportation impacts under CEQA.”<sup>3</sup>)

Arguably, assessment of VMT for heavy-duty trucks would actually be contrary to CEQA, as it would count non-employee miles traveled. The reason trucks are excluded from CEQA analysis is because there is no mechanism to reduce truck miles traveled. The Technical Advisory lists a whole host of “potential measures to reduce vehicle miles traveled.” None of them refer to measures which could reduce miles traveled for heavy-duty trucks (and are all focused on employee trips):

- Improve or increase access to transit.
- Increase access to common goods and services, such as groceries, schools, and daycare.
- Incorporate affordable housing into the project.
- Incorporate neighborhood electric vehicle network. Orient the project toward transit, bicycle, and pedestrian facilities.
- Improve pedestrian or bicycle networks, or transit service.
- Provide traffic calming.
- Provide bicycle parking. Limit or eliminate parking supply.
- Unbundle parking costs.
- Provide parking cash-out programs.
- Implement roadway pricing.
- Implement or provide access to a commute reduction program.
- Provide car-sharing, bike sharing, and ride-sharing programs.
- Provide transit passes.
- Shifting single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services.
- Providing telework options. Providing incentives or subsidies that increase the use of modes other than single-occupancy vehicle.
- Providing on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms.
- Providing employee transportation coordinators at employment sites.
- Providing a guaranteed ride home service to users of non-auto modes.

**B-13** The alternatives are described in sufficient detail in the DEIR to analyze their potential impacts compared to those of the proposed Project. The potential self-storage facility under Alternative 1 is one of the few commercial uses that would be allowed under the ALUC safety zone restrictions clearly described in the DEIR Project Description. The fact that it would require a Specific Plan Amendment (SPA) is an oversight, but its impacts would be minor compared to the primary land use limitations represented by the ALUC restrictions which would not affect other PVCCSP properties in the same way. The addition of a minor SPA to allow self-storage in the commercial zone could still require a Conditional Use Permit which would give the City adequate discretion on this type of use. The DEIR would not need to be recirculated to include this minor correction to Alternative 1.

**B-14** Responses B-3 through B-13 above demonstrate that the DEIR is not flawed and does not

<sup>2</sup><https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/JVR/DEIR/Chapters/JVR%20DEIR%203.1.7%20Transportation.pdf>

<sup>3</sup> <https://www.longbeach.gov/globalassets/city-manager/media-library/documents/memos-to-the-mayor-tabbed-file-list-folders/2020/june-30-2020---vehicle-miles-traveled--vmt--standards-for-development-review>

need to be revised and recirculated for additional public review. As indicated in Response B-1 above, the commenter will be included in future notices regarding the project and its CEQA documentation.



**Comment Letter C**

Lozeau Drury, LLP on Behalf of Supporters Alliance for Environmental Responsibility (SAFER) (2-4-2022)



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*Via Email*

February 4, 2022

Chantal Power, Contract Planner  
Development Services Department  
City of Perris  
101 North "D" Street  
Perris, CA 92570  
[cpower@interwestgrp.com](mailto:cpower@interwestgrp.com)

**Re: Comment on Draft Environmental Impact Report, Perris Valley Commerce Center Specific Plan, Amendment No. 13 (SPA19-05287, DPR 19-00012)**

Dear Ms. Power:

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the Draft Environmental Impact Report ("DEIR") prepared for the project known as Perris Valley Commerce Center Specific Plan, Amendment No. 13 (SPA19-05287, Development Plan Review No. 19-00012), including all actions related or referring to the construction of a 347,918-square foot light industrial building, located on an approximately 16-acre site on the southeast corner of Ramona Expressway and Indian Avenue in the City of Perris ("Project").

C1

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER requests that the Development Services Department address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project.

C2

We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

C3

Sincerely,

A handwritten signature in black ink, appearing to read "Amalia Bowley Fuentes".

Amalia Bowley Fuentes  
LOZEAU DRURY LLP

**Responses Comment Letter C**

- C-1** The City understands the commenter and the SAFER organization has an interest in the proposed PVCC SPA 13 Project and is commenting specifically on the Draft EIR for that project as issued by the City as lead agency (SCH# 2021005021). This comment does not question the content of conclusions of the DEIR.
- C-2** The commenter has failed to provide any evidence that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. In addition, mitigation is not required to reduce any impacts of a project. State CEQA Guidelines Section 15126.4(a)(1) states that "an EIR shall describe feasible measures which could minimize **significant** adverse impacts, including where relevant, inefficient and unnecessary consumption of energy" [emphasis added]. The analysis presented in the DEIR demonstrates that all potential impacts of the proposed Project would be less than significant after the implementation of the mitigation measures presented in the DEIR. No further mitigation measures are required to reduce an otherwise significant impact of the Project.
- C-3** The City understands the commenter and the SAFER organization may wish to submit additional comments on the DEIR for this Project.

**Comment Letter D**

Adam Salcido (2-4-2022)

**From:** [A.S](#)  
**To:** [Chantal Power](#)  
**Cc:** [Unknown](#); [jbourgeois029@gmail.com](mailto:jbourgeois029@gmail.com); [Terrance Lucio](#); [PATRICK HANINGER](#)  
**Subject:** Perris Valley Commerce Center (PVCCSP, Amendment No. 13 (SPA19-05287))  
**Date:** Friday, February 4, 2022 4:07:54 PM

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Good Afternoon Ms. Power,

Please provide any updates to the above mentioned project.

I am requesting under Public Resource Code Section 21092.2 to add the email addresses and mailing address below to the notification list, regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project.

[t.lucio57@gmail.com](mailto:t.lucio57@gmail.com)

[phaninger1@gmail.com](mailto:phaninger1@gmail.com)

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[asalcido.07@gmail.com](mailto:asalcido.07@gmail.com)

Mailing Address:

P.O. Box 79222

Corona, CA 92877

Please confirm receipt of this email.

Thank You,

Adam Salcido

D1

**Responses to Comment Letter D**

- D-1** The post office box is in Corona and the emails do not indicate a particular organization, so it is unclear if the identified individuals represent a local community or environmental interest group or are just interested individuals. However, the City acknowledges the commenter's request to include the five indicated email addresses and the post office box mailing address to receive additional information for this project according to the limitations in state law and CEQA.

**Comment Letter E**

Frank Wen, Ph.D., Southern California Association of Governments (SCAG) (2-8-2022)



February 8, 2022

Ms. Chantal Power, AICP Contract Planner  
City of Perris Planning Division  
101 North "D" Street  
Perris, California 92570  
Phone: (909) 754-1653  
E-mail: [cpower@interwestgrp.com](mailto:cpower@interwestgrp.com)

**RE: SCAG Comments on the Draft Environmental Impact Report (DEIR) for the Perris Valley Commerce Center Specific Plan, Amendment No. 13 & Development Plan Review 19-00012 [SCAG NO. IGR10551]**

SOUTHERN CALIFORNIA  
ASSOCIATION OF GOVERNMENTS  
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- First Vice President  
**Jan C. Harnik, Riverside County  
Transportation Commission**
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Human Development  
**Jorge Marquez, Covina**
- Energy & Environment  
**David Pollock, Moorpark**
- Transportation  
**Sean Ashton, Downey**

Dear Ms. Power,

Thank you for submitting the Notice of Availability of the Draft Environmental Impact Report (DEIR) for the Perris Valley Commerce Center Specific Plan, Amendment No. 13 & Development Plan Review 19-00012 ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. The proposed project includes an amendment to the Perris Valley Commerce Center Specific Plan from Commercial to Light Industrial for the development of a 347,918 square feet (SF) light industrial building with 339,918 SF non-refrigerated warehouse space and 8,000 SF of office space, plus 145 parking spaces and 82 trailer parking spaces on a 16-acre site.

E1

Based on SCAG staff's review, the proposed project generally supports overall the goals of the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). SCAG staff comments are detailed in the attachment to this letter.

When available, please send the Final Environmental Impact Report electronically to [IGR@scag.ca.gov](mailto:IGR@scag.ca.gov) or by mail to SCAG's Los Angeles Headquarters, located at 900 Wilshire Boulevard, Suite 1700, Los Angeles, CA 90017. If you have any questions regarding the attached comments, please contact the Intergovernmental Review (IGR) Program, attn.: Anita Au, Senior Regional Planner, at (213) 236-1874 or [IGR@scag.ca.gov](mailto:IGR@scag.ca.gov). Thank you.

E2

Sincerely,

Frank Wen, Ph.D.  
Manager, Planning Strategy Department



**COMMENTS ON THE NOTICE OF AVAILABILITY OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
PERRIS VALLEY COMMERCE CENTER SPECIFIC PLAN  
AMENDMENT NO. 13 & DEVELOPMENT PLAN REVIEW 19-00012  
[SCAG NO. IGR10551]**

**SUMMARY**

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG’s feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies.

E3

Based on SCAG staff review, the proposed project generally supports the applicable goals of the 2020 Connect SoCal, although the references to population growth in the DEIR are not based on the growth forecasts adopted as part of the 2020 Connect SoCal.

**CONNECT SOCIAL GOALS**

The SCAG Regional Council fully adopted [Connect SoCal](#) in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCIAL GOALS	
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>
Goal #3:	<i>Enhance the preservation, security, and resilience of the regional transportation system</i>
Goal #4:	<i>Increase person and goods movement and travel choices within the transportation system</i>
Goal #5:	<i>Reduce greenhouse gas emissions and improve air quality</i>
Goal #6:	<i>Support healthy and equitable communities</i>
Goal #7:	<i>Adapt to a changing climate and support an integrated regional development pattern and transportation network</i>
Goal #8:	<i>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</i>
Goal #9:	<i>Encourage development of diverse housing types in areas that are supported by multiple transportation options</i>
Goal #10:	<i>Promote conservation of natural and agricultural lands and restoration of habitats</i>

E4

### Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. To view Connect SoCal and the accompanying technical reports, please visit the [Connect SoCal webpage](#). Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

E4  
cont.

### SCAG Staff Comments

*SCAG staff recommends that you review 2020 Connect SoCal and consider its adopted goals and policies when finalizing the proposed project. The 2020 Connect SoCal also identifies a goods movement system in the SCAG region and develops strategies to address expected growth trends and demands in goods movement. For further information on the goods movement strategies, please see the [2020 Connect SoCal Goods Movement Technical Report](#). For further information on industrial development and warehousing in Southern California, please see [Industrial Warehousing in the SCAG Region](#).*

### DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG's 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal's Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the [Connect SoCal Demographics and Growth Forecast Technical Report](#). The growth forecasts for the region and applicable jurisdictions are below.

E5

	Adopted SCAG Region Wide Forecasts				Adopted City of Perris Forecasts			
	Year 2020	Year 2030	Year 2035	Year 2045	Year 2020	Year 2030	Year 2035	Year 2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	83,088	101,117	108,931	121,038
Households	6,333,458	6,902,821	7,170,110	7,633,451	21,431	27,458	30,007	33,798
Employment	8,695,427	9,303,627	9,566,384	10,048,822	19,013	23,267	24,797	26,411

E5  
cont.

**SCAG Staff Comments**

*The fifth paragraph on page 6-13 of the DEIR cites a 2020 figure that indicates that population forecasts were not based on the most recently adopted SCAG 2020 Connect SoCal Regional Growth Forecasts. SCAG staff recommends updating the discussion to reflect the latest regional growth forecasts, as provided in the table above.*

**MITIGATION**

**SCAG Staff Comments**

*SCAG staff recommends that you review the [Final Program Environmental Impact Report](#) (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG’s Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the [PEIR webpage](#) and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.*

E6

**Response to Comment Letter E**

- E-1** For the purposes of this comment, the summary of project characteristics provided by the commenter is accurate. The City acknowledges SCAG staff's comment that "the proposed project generally supports the overall goals of the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal)." When completed, the Final EIR, including Response to Comments on the DEIR, will be transmitted to SCAG's IGR group as requested.
- E-2** The Final EIR will be sent to the indicated email address ([IGR@scag.ca.gov](mailto:IGR@scag.ca.gov)) per the commenter's request at least 10 days before a decision on the Project, per State CEQA Guidelines Section 15089(b).
- E-3** The City acknowledges SCAG's role in regional planning for Southern California and specific responses are provided to SCAG's specific comments below. The City appreciates SCAG's comment that..."based on SCAG staff review, the proposed project generally supports the applicable goals of the 2020 Connect SoCal..." In addition, the City acknowledges that SCAG's comment regarding the DEIR's references to population growth are not based on the forecasts provided in the SCAG 2020 Connect SoCal document. The cited population figure is an actual value obtained from the census bureau, and the section makes no reference to the 2020 Connect SoCal forecasts. However, the forecasts provided by SCAG from that document were reviewed and the Project is consistent with the employment estimates in the 2020 Connect SoCal document (the Project is a warehouse so it will not generate housing or population). The population, housing, and employment forecasts provided by SCAG will be added to the DEIR text in Section 4.8, Land Use and Planning, as well as Section 6, Topical Issues, Cumulative Impacts, Population and Housing (see Section 3, Errata, of this document). This added information does not change the conclusions of the DEIR.
- E-4** Table 4.8-5 evaluating the Project's consistency with the 10 cited 2020 Connect SoCal goals will be inserted into DEIR Section 4.8, Land Use and Planning (see Section 3, Errata, of this document). This added information does not change the conclusions of the DEIR.
- City staff have reviewed the cited technical reports which mainly recommend sustainability practices and equipment for goods movement facilities. The information contained in those documents does not influence the location, size, or other characteristics of the proposed Project. The City of Perris will consider the potential sustainability recommendations in these references for subsequent planning documents as appropriate.
- To address SCAG's comment as completely as possible, new Table 4.8-5 evaluating the Project's consistency with the 10 cited 2020 Connect SoCal goals will be inserted into DEIR Section 4.8, Land Use and Planning (see Section 3, Errata, of this document). This added information does not change the conclusions of the DEIR.
- E-5** The City acknowledges that the forecasts provided by SCAG for the SCAG Region and the City of Perris are the same as those contained in the 2020-2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). These will be inserted into DEIR Section 6, Topical Issues, Cumulative Impacts, Population and Housing (see Section 3, Errata, of this document). This added information does not change the conclusions of the DEIR.
- E-6** The City has reviewed the cited references and as suggested by SCAG staff. However, the

analysis presented in the DEIR demonstrates that all potential impacts of the proposed Project would be less than significant after the implementation of the mitigation measures presented in the DEIR. No further mitigation measures are required to reduce an otherwise significant impact of the Project.

### 3.0 ERRATA

Changes to the DEIR are noted below. Underlining indicates additions to the text; striking indicates deletions to the text. The changes to the DEIR do not affect the overall conclusions of the environmental document. These errata represent changes to the DEIR to provide clarification, corrections, revisions as needed as a result of public comments on the DEIR, or due to additional information received during the public review period, and minor typographical revisions. These clarifications and corrections are not considered to result in any new or more severe impacts than identified in the DEIR and are not otherwise deemed to warrant DEIR recirculation pursuant to CEQA Guidelines Section 15088.5. Added or modified text is shown by underlining (example) while deleted text is shown by striking (~~example~~).

#### **Initial Study Section V.2 - Agricultural and Forest Resources** (*paragraphs 6 and 7, pp. 34-35*)

*Subsequent to circulation of the Draft EIR, the City received an email stating that the title report for the Project site still indicated that a Williamson Act agricultural conservation easement (ACE) was in place on the property. The applicant has submitted an application and notice to the City for cancelation of the ACE. However, information from the City's General Plan and the PVCCSP EIR both indicate that the agricultural preserve status of the land is still in place, as outlined below:*

As stated in the City of Perris General Plan 2030 DEIR, Appendix A, Initial Study, Section II, Agricultural Resources:

"The 1991 General Plan Land Use Element eliminated the "agricultural" land use designation. Accordingly, the Environmental Impact Report prepared in conjunction with the 1991 General Plan identified conversion of agricultural land as a significant cumulative impact. The EIR Findings indicated that certain social and economic factors outweighed the cumulative impacts associated with conversion of agricultural land to non-agricultural use and a Statement of Overriding Considerations were thereby adopted. Accordingly, adoption and implementation of the project General Plan will have no impact."

Furthermore, the City's 2030 GP-DEIR states:

"The 1991 General Plan Land Use Element redesignated all agricultural lands for uses other than agriculture. Remaining land zoned for agricultural use is subject to a Williamson Act contract for which a notice of non-renewal has been indicating that the land will be taken out of agricultural production. Adoption and implementation of the project under the General Plan will have no impact on the non-renewal."

This citation from the General Plan EIR is incorrect in that the notice of non-renewal will actually be a cancellation which will document that the land is being formally removed from agricultural preserve status under the Williamson Act. However, the conclusion is the same, adoption and implementation of the Project under the General Plan will have no impact on a cancellation.

The proposed Project would implement the PVCCSP as amended from commercial to industrial uses. Cancellation of the agricultural conservation easement will simply occur later than the previously indicated non-renewal in the GP EIR and PVCCSP EIR. No change in impacts to agricultural resources as identified in the GP EIR and PVCCSP EIR is anticipated, only the timing under which documentation of the change will occur.

**Initial Study Section V.2 - Agricultural and Forest Resources** (*paragraph 4, p. 35*)

According to Riverside County’s *Map My County*, the Project site is located within an Agricultural Preserve identified as Perris Valley No. 1 Map No. 56; ~~however, it is not identified as being and is still~~ subject to an existing Williamson Act contract. The applicant is in the process of cancelling the contract as previously indicated as a non-renewal in the GP EIR and PVCCSP EIR. In addition, the Project site is vacant land and there have been no recent agricultural activities on site. ~~Therefore, Once the cancellation is completed, the Project will not conflict with a Williamson Act contract and the cancellation would have no impact on existing agricultural operations.~~ No impact will occur.

**4.8 Land Use and Planning**

*The following data and analysis were added at the request of the Southern California Association of Governments (SCAG) to demonstrate if the Project is fully consistent with adopted regional plans.*

**4.8.4 Potential Impacts (Threshold b)**

Regional Plans (*paragraph 1, p. 4.8-16*)

The proposed industrial uses of the Project were not anticipated or analyzed in the GPEIR; however, the General Plan did anticipate 16 acres of commercial uses on this site (approximately 273,557 square feet based on a floor area ratio or FAR of 0.4) and this amount of commercial square footage would have equivalent or greater regional impacts (e.g., traffic, air quality) compared to the proposed light industrial uses. In contrast, the proposed light industrial use could have different localized impacts compared to commercial uses relative to potential health risks from more truck traffic relative to passenger vehicle traffic. However, the overall impacts of the proposed Project would most likely be equivalent to those of commercial uses which are currently planned for the site, and which was the basis for the 2020 RTP/SCS. In addition, the size of the Project does not exceed the thresholds established by CEQA for regionally significant projects (State CEQA Guidelines Section 15206). The Project could add 232 to 717 new employees<sup>4</sup> to the City compared to the 4,254 employees estimated by SCAG to be added from 2020 to 2030 (see **Table 4.8-4, SCAG Forecasts**). **Table 4.8-4** demonstrates the Project is consistent with SCAG’s Connect SoCal goals. In addition, **Table 4.8-5, Project Consistency with SCAG Regional Goals**, provides a comparison of the Project against ~~therefore, the proposed Project does not need to be evaluated against~~ the specific goals or policies of SCAG’s regional plan, Connect SoCal - the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS). In this regard, the proposed industrial uses of the Project would not have substantially different impacts relative to regional land use and environmental plans (i.e., the 2020 RTP/SCS) compared to the current planned use (i.e., commercial).

**Table 4.8-4**  
**SCAG Forecasts** (*new table*)

Category	Adopted SCAG Region-Wide Forecasts				Adopted City of Perris Forecasts			
	2020	2030	2035	2045	2020	2030	2035	2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	83,088	101,117	108,931	121,038
Housing	6,333,458	6,902,821	7,170,110	7,633,451	21,431	27,458	30,007	33,798
Employment	8,695,427	9,303,627	9,566,384	10,048,822	19,013	23,267	24,797	26,411

Source: SCAG 2020 Connect SoCal

<sup>4</sup> DEIR page 5-2 Based on ALUC or SCAG employee ratios

**Table 4.8-5**  
**Project Consistency with SCAG Regional Goals**  
 (new table)

<b>SCAG Connect SoCal Regional Goals</b>	<b>Project Consistency</b>
<b>Goal #1:</b> <u>Encourage regional economic prosperity and global competitiveness</u>	<b>Consistent.</b> <u>The Project will add hundreds of new jobs and increased property taxes to the City's economic base, and the warehouse will help the area compete with the regional need for logistics warehousing.</u>
<b>Goal #2:</b> <u>Improve mobility, accessibility, reliability and travel safety for people and goods</u>	<b>Consistent.</b> <u>The Project will contribute to pedestrian, bicycle, and transit-related improvements in the surrounding area to improve non-vehicular access.</u>
<b>Goal #3:</b> <u>Enhance the preservation, security, and resilience of the regional transportation system</u>	<b>Consistent.</b> <u>The Project will make improvements to adjacent roadways as needed and required. It will also contribute to overall non-vehicular access for the region (see analysis of Goal #2).</u>
<b>Goal #4:</b> <u>Increase person and goods movement and travel choices within the transportation system</u>	<b>Consistent.</b> <u>Project is a warehouse which will incrementally improve regional goods movement and also contribute to overall non-vehicular access for the region (see analysis of Goal #2).</u>
<b>Goal #5:</b> <u>Reduce greenhouse gas emissions and improve air quality</u>	<b>Consistent.</b> <u>The Project will have less than significant impacts related to air quality and greenhouse gas emissions with implementation of the recommended mitigation.</u>
<b>Goal #6:</b> <u>Support healthy and equitable communities</u>	<b>Consistent.</b> <u>The Project will provide jobs that support a variety of income levels within the local economy. Employed individuals can afford wider lifestyle choices such as purchasing healthy foods and reducing stressful activities.</u>
<b>Goal #7:</b> <u>Adapt to a changing climate and support an integrated regional development pattern and transportation network</u>	<b>Consistent.</b> <u>The Project will provide warehousing in proximity to the I-215 Freeway to serve this southwestern portion of Riverside County.</u>
<b>Goal #8:</b> <u>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</u>	<b>Consistent.</b> <u>The Project will be required to comply with the SCAQMD's new Rule 2305 program called Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) program approved in May 2021. Rule 2305 applies to operators and owners of existing and new warehouses greater than 100,000 square feet.</u>
<b>Goal #9:</b> <u>Encourage development of diverse housing types in areas that are supported by multiple transportation options</u>	<b>Not Applicable.</b> <u>Project is a warehouse and does not propose any housing.</u>
<b>Goal #10:</b> <u>Promote conservation of natural and agricultural lands and restoration of habitats</u>	<b>Not Applicable.</b> <u>The Project currently has an agricultural conservation easement in place that is already in the process of being removed. The site contains no habitat that can be restored.</u>

Source: SCAG 2020 Connect SoCal



**Section 6, Topical Issues**

**6.2 Cumulative Impacts**

Population and Housing (7<sup>th</sup> paragraph, p. 6-65)

According to the US Census Bureau, the City’s population as of July 2015 was 74,971 (US Census Bureau 2016). The Southern California Association of Governments (SCAG) estimates that the population of Perris is expected to increase to about ~~116,700~~ 83,088 by the year 2020 ~~although this figure is significantly above current City development conditions as shown in Table 6-1, SCAG Forecasts.~~

**Table 6-1**  
**SCAG Forecasts**  
(new table)

<b>Category</b>	<b>Adopted SCAG Region-Wide Forecasts</b>				<b>Adopted City of Perris Forecasts</b>			
	<b>2020</b>	<b>2030</b>	<b>2035</b>	<b>2045</b>	<b>2020</b>	<b>2030</b>	<b>2035</b>	<b>2045</b>
Population	<u>19,517,731</u>	<u>20,821,171</u>	<u>21,443,006</u>	<u>22,503,899</u>	<u>83,088</u>	<u>101,117</u>	<u>108,931</u>	<u>121,038</u>
Housing	<u>6,333,458</u>	<u>6,902,821</u>	<u>7,170,110</u>	<u>7,633,451</u>	<u>21,431</u>	<u>27,458</u>	<u>30,007</u>	<u>33,798</u>
Employment	<u>8,695,427</u>	<u>9,303,627</u>	<u>9,566,384</u>	<u>10,048,822</u>	<u>19,013</u>	<u>23,267</u>	<u>24,797</u>	<u>26,411</u>

Source: SCAG 2020 Connect SoCal

**CONCLUSION.** *None of the additional or modified information provided in this section of the FEIR rises to the level of “significant new information” in that it does not change the conclusions of the EIR regarding significant impacts or mitigation. This information merely clarifies or expands on information already in the EIR and therefore does not trigger the need to recirculate the DEIR for additional public review and comment.*

#### **4.0 MITIGATION MONITORING AND REPORTING PROGRAM**

##### **A. Mitigation Monitoring Requirements and Procedures**

The California Environmental Quality Act (CEQA) was amended in 1989 to add Section 21081.6, which requires a public agency to adopt a monitoring and reporting program for assessing and ensuring compliance with any required mitigation measures applied to a proposed development. As stated in Section 21081.6 of the Public Resources Code,

*“...the public agency shall adopt a reporting or monitoring program for the changes to the project which it has adopted, or made a condition of project approval, in order to mitigate or avoid significant effects on the environment.”*

Section 21081.6 provides general guidelines for implementing mitigation monitoring programs and indicates that specific reporting and/or monitoring requirements, to be enforced during project implementation, shall be defined prior to final certification of the EIR.

The mitigation monitoring table provided below lists those mitigation measures that may or may not be included as conditions of approval for the Project. To ensure that all the mitigation measures are properly implemented, the following monitoring program identifies the timing and responsibility for monitoring each measure. The developer will have the primary responsibility for implementing the measures, and the various City of Perris departments will have the primary responsibility for monitoring and reporting the implementation of the mitigation measures.

Impact Category	Impact	Mitigation Measures	Implementation Timing	Responsible Party	Method of Verification	City Verification of Compliance (Date/Initials)
Aesthetics	THRESHOLD d: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<b>MM-AES-1:</b> 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.	Prior to issuance of a grading permit	City Planning Division	Verify lighting plan shows proper fixtures and orientation	
Air Quality & Greenhouse Gas	<p>THRESHOLD b: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?</p> <p>THRESHOLD c: Would the Project expose sensitive receptors to substantial pollutant concentrations?</p>	<b>PVCCSP MM Air 2:</b> Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.	Prior to issuance of a grading permit	City Planning Division	Review and approve Traffic Control Plan	

Impact Category	Impact	Mitigation Measures	Implementation Timing	Responsible Party	Method of Verification	City Verification of Compliance (Date/Initials)
		<p><b>PVCCSP MM Air 3:</b> To reduce fugitive dust emissions, the development of each individual implementing development project shall comply with SCAQMD Rule 403. The developer of each implementing project shall provide the City of Perris with the SCAQMD-approved dust control plan, or other sufficient proof of compliance with Rule 403, prior to grading permit issuance. Dust control measures shall include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• Requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered;</li> <li>• 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;</li> <li>• Posting and enforcement of traffic speed limits of 15 miles per hour or less on all unpaved portions of the project site;</li> <li>• Suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 miles per hour;</li> <li>• Appointment of a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM-</li> </ul>	<p>Prior to issuance of a grading permit</p> <p>Periodically during grading</p>	<p>City Planning Division</p> <p>City Inspector</p>	<p>Grading plans to include specific actions from Rule 403</p> <p>Verify project implementing Rule 403 as indicated on plans</p>	

Impact Category	Impact	Mitigation Measures	Implementation Timing	Responsible Party	Method of Verification	City Verification of Compliance (Date/Initials)
		<p>10 generation;</p> <ul style="list-style-type: none"> <li>Sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks when sweeping streets to remove visible soil materials; and/or, </li></ul> <p>Replacement of ground cover in disturbed areas as quickly as possible.</p>				
		<p><b>PVCCSP MM Air 4:</b> Building and grading permits shall include a restriction that limits idling of construction equipment on site to no more than five minutes.</p>	<p>Prior to issuance of a grading or building permit</p>	<p>City Planning Division</p>	<p>Verify contract specifications include required language</p>	
		<p><b>PVCCSP MM Air 5:</b> Electricity from power poles shall be used instead of temporary diesel or gasoline-powered generators to reduce the associated emissions. Approval will be required by the City of Perris Building Division prior to issuance of grading permits.</p>	<p>Prior to issuance of a grading permit</p>	<p>City Building Division</p>	<p>Verify contract specifications include required language</p>	
		<p><b>PVCCSP MM Air 6:</b> 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.</p>	<p>Prior to issuance of a grading permit</p>	<p>City Building Division</p>	<p>Verify contract specifications include required language</p>	

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		<p><b>PVCCSP MM Air 7:</b> During construction, ozone precursor emissions from mobile construction equipment shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturers' specifications to the satisfaction of the City of Perris Building Division. Equipment maintenance records and equipment design specification data sheets shall be kept on-site during construction. Compliance with this measure shall be subject to periodic inspections by the City of Perris Building Division.</p>	Prior to issuance of a grading permit	City Planning Division	Verify contract specifications include required language	
		<p><b>PVCCSP MM Air 8:</b> Each individual implementing development project shall apply paints using either high volume low pressure (HVLP) spray equipment with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.</p>	Prior to issuance of a building permit	City Planning Division	Verify contract specifications include specified equipment and standard	
		<p><b>PVCCSP MM Air 9:</b> To reduce VOC emissions associated with architectural coating, the project designer and contractor shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g., bathroom stall dividers, metal awnings), materials that do not require painting, and require coatings and solvents with a VOC content lower than required under Rule 1113 to be utilized. The construction contractor shall be required to utilize "Super-Compliant" VOC paints, which are defined in SCAQMD's Rule 1113. Construction specifications shall be included in building specifications that assure these requirements are implemented. The specifications for each implementing development project shall be reviewed by the City of Perris Building Division for compliance with this mitigation measure prior to issuance of a building permit for that project.</p>	Prior to issuance of a building permit	City Planning Division	Verify contract specifications include use of pre-coated materials and specified paints	

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		<p><b>PVCCSP MM Air 11:</b> Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of five minutes.</p>	<p>Prior to issuance of a Certificate of Occupancy</p>	<p>City Planning Division</p>	<p>Verify placement of signs</p>	
		<p><b>PVCCSP MM Air 13:</b> In order to promote alternative fuels, and help support “clean” truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD’s Carl Moyer Program, or other state programs that restrict operations to “clean” trucks, such as 2007 or newer model year or 2010 compliant vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year would be used at a facility with three or more dock-high doors, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP [On-road Heavy Duty Voucher Incentive Program], HVIP [Hybrid and Zero- Emission Truck and Bus Voucher Incentive Project], and SOON [Surplus Off-Road Opt-in for NOx] funding programs, as identified on SCAQMD’s website (<a href="http://www.aqmd.gov">http://www.aqmd.gov</a>). Tenants would be required to use those funds, if awarded.</p>	<p>Prior to issuance of a Certificate of Occupancy</p>	<p>City Planning Division</p>	<p>Verify developer has provided required materials to building occupants</p>	
		<p><b>PVCCSP MM Air 14:</b> Each implementing development project shall designate parking spaces for high-occupancy vehicles and provide larger parking spaces to accommodate vans used for ride sharing. Proof of compliance would be required prior to the issuance of occupancy permits.</p>	<p>Prior to issuance of a building permit</p>	<p>City Planning Division</p>	<p>Verify plans indicate specified parking spaces</p>	

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		<p><b>PVCCSP MM Air 19:</b> In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g., electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the project site. These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris Building Division) prior to conveyance of applicable streets.</p>	Prior to issuance of a building permit	City Building Division	Verify plans indicate specified lighting	
		<p><b>PVCCSP MM Air 20:</b> Each implementing development project shall be encouraged to implement, at a minimum, an increase in each building's energy efficiency 15 percent beyond Title 24, and reduce indoor water use by 25 percent. All reductions will be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.</p>	Prior to issuance of a building permit	City Building Division	Verify plans indicate specified conservation	
Biological Resources	<p>THRESHOLD f: Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?</p>	<p><b>PVCCSP MM Bio 1:</b> 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 PVCCSP 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 birdspecies.</p> <p>If site-preparation activities for an implementing project are proposed during the nesting/breeding season (February 1 to August 31), a pre-activity field survey shall be conducted by a qualified biologist prior to the issuance of grading permits for such project, to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not</p>	Prior to issuance of a grading permit or before any ground-disturbing activity	City Planning Division	Verify nesting bird survey has been completed as specified	



Impact Category	Impact	Mitigation Measures	Implementation Timing	Responsible Party	Method of Verification	City Verification of Compliance (Date/Initials)
		<p>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, 300feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non- listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.</p>				
		<p><b>PVCCSP MM Bio 2:</b> Project-specific habitat assessments and focused surveys for burrowing owls would be conducted for implementing development or infrastructure projects within burrowing owl survey areas.</p> <p>A pre-construction survey for resident burrowing owls would also be conducted by a qualified biologist within 30 days prior to commencement of grading and construction activities within those portions of implementing project sites containing suitable burrowing owl habitat and for those properties within an implementing project site where the biologist could not gain access.</p> <p>If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity would be conducted in accordance with the current Burrowing Owl Instruction for the Western</p>	<p>Prior to issuance of a grading permit or before any ground-disturbing activity</p>	<p>City Planning Division</p>	<p>Verify owl survey has been completed as specified</p>	

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		<p>Riverside MSHCP.</p> <p>If active nests are identified on an implementing project site during the pre-construction survey, the nests shall be avoided, or the owls actively or passively relocated. To adequately avoid active nests, no grading or heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31), and 160 feet during the non-breeding season.</p>				
Cultural Resources	<p>THRESHOLD a: Would the Project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?</p> <p>THRESHOLD b: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?</p>	<p><b>MM-CR-1:</b> 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.</p> <p>The archaeologist shall be responsible for monitoring ground-disturbing activities, maintaining daily field notes and a photographic record, and for reporting all finds to the developer and the City of Perris in a timely manner. The archaeologist shall be prepared and equipped to record and salvage cultural</p>	Prior to issuance of a grading permit	City Planning Division	Verify archaeologist has been retained and contracted for specified work	

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

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		<p>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. All analysis will be undertaken in a manner that avoids destruction or other adverse impacts.</p> <p>Native American artifacts that are relocated/reburied at the Project site 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 permanent protection, and that reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist.</p> <p>Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. Subsequent to analysis and reporting, these artifacts will be subjected to curation, as deemed appropriate, or returned to the property owner.</p> <p>Once grading activities have ceased and/or the archaeologist, in consultation with the designated Luiseño representative, determines that monitoring is no longer warranted,</p>				

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		<p>monitoring activities can be discontinued following notification to the City of Perris Planning Division.</p> <p>A report of findings, including an itemized inventory of artifacts, shall be prepared upon completion of the tasks outlined above. The report shall include all data outlined by the Office of Historic Preservation guidelines, including a conclusion of the significance of all recovered, relocated, and reburied artifacts. A copy of the report shall also be filed with the City of Perris Planning Division, the University of California, Riverside, Eastern Information Center (EIC) and the Luiseño tribe(s) involved with the Project.</p>				
		<p><b>MM-CR-2:</b> In the event that human remains (or remains that may be human) are discovered at the Project site or within the off-site Project improvement areas during ground-disturbing activities, the construction contractors, Project archaeologist, and/or designated Luiseño tribal representative shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Perris Planning Division immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).</p> <p>If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the "Most Likely Descendent" (MLD). Despite the affiliation with any Luiseño tribal representative(s) at the site, the NAHC's identification of the MLD will stand. The MLD shall be granted access to inspect</p>	<p>If human remains are found during grading</p>	<p>City Planning Division</p>	<p>Developer shall notify City for appropriate coordination</p>	

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		<p>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 the median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98l and 5097.94(k)).</p> <p>The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The locations will be documented by the consulting archaeologist in conjunction with the various stakeholders and a report of findings will be filed with the EIC.</p>					
Energy	<p>THRESHOLD a: Would the Project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?</p> <p>THRESHOLD b: Would the Project conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?</p>	<p><b>PVCCSP MM Air 4, PVCCSP MM Air 11, PVCCSP MM Air 14, PVCCSP MM Air 19, and PVCCSP MM Air 20</b> shall apply; see Air Quality Section above</p>					
Geology and Soils	<p>THRESHOLD b: Would the Project result in substantial soil erosion or the loss of topsoil?</p>	<p><b>PVCCSP MM Air 3</b> shall apply; see Air Quality Section above</p>					

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	<p>THRESHOLD f: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</p>	<p><b>MM-GEO-1:</b> Prior to the issuance of grading permits, the Project proponent/developer shall submit to and receive approval from the City, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The PRIMMP shall include the provision for a qualified professional paleontologist (or his or her trained paleontological representative) to be on-site for any Project-related excavations that exceed three (3) feet below the pre-grade surface. Selection of the paleontologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the Project site or within the off-site Project improvement areas until the paleontologist has been approved by the City.</p> <p>Monitoring shall be restricted to undisturbed subsurface areas of older Quaternary alluvium. The approved paleontologist shall be prepared to quickly salvage fossils as they are unearthed to avoid construction delays. The paleontologist shall also remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontologist shall have the power to temporarily halt or divert grading equipment to allow for removal of abundant or large specimens.</p> <p>Collected samples of sediments shall be washed to recover small invertebrate and vertebrate fossils. Recovered specimens shall be prepared so that they can be identified and permanently preserved. Specimens shall be identified and curated and placed into an accredited repository (such as the Western Science Center or the Riverside Metropolitan Museum) with</p>	<p>Prior to issuance of a grading permit</p>	<p>City Planning Division</p>	<p>Verify PRIMMP prepared and implemented</p>	

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		<p>permanent curation and retrievable storage.</p> <p>A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered specimens. The report and inventory, when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontological resources.</p>				
Greenhouse Gas	THRESHOLD b: Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?	<p><b>PVCCSP MM Air 2, PVCCSP MM Air 4, PVCCSP MM Air 7, PVCCSP MM Air 11, PVCCSP MM Air 13, PVCCSP MM Air 14, PVCCSP MM Air 19, and PVCCSP MM Air 20</b> shall apply; see Air Quality Section above</p>				
Hazards and Hazardous Materials	THRESHOLD b: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<p><b>MM-HAZ-1: Pesticide Presence.</b> Prior to any ground disturbance activities, the Project applicant shall coordinate the sampling and laboratory testing of onsite soils for contamination by past agricultural chemicals (e.g., pesticides, herbicides, rodenticides, heavy metals, etc.) with the County Department of Environmental Health Services (DEH). If requested, the applicant shall submit a workplan to DEH for review and approval prior to the completion of grading. If any past agricultural chemicals are found in levels that exceed applicable health standards, a qualified contractor shall be retained to remove and properly dispose of such materials. Any work conducted shall be in compliance with DEH guidelines as the appropriate oversight agency. If sampling and laboratory testing are performed, a final report shall be prepared and submitted to DEH for review and approval prior to issuance of a certificate of occupancy.</p>	Prior to any ground disturbing activities	City Planning Division	Verify testing has been completed	
		<p><b>MM-HAZ-2: Buried Hazards.</b> If any former fuel tanks or other potentially</p>	During grading	City Planning Division	Verify any needed work has been	



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		<p>hazardous materials are found during grading or any ground disturbing activities, work in that area shall be halted within 100 feet of the find and a qualified environmental contractor shall be retained. The contractor shall assess the risk or hazard level of the material(s) and identify the most appropriate method of remediation. This work shall occur in coordination with and to the satisfaction of the County Department of Environmental Health Services (DEH).</p>			<p>coordinated with DEH</p>	
	<p>THRESHOLD e: Would the Project result in a safety hazard or excessive noise for people residing or working in the Project area (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)?</p>	<p><b>MM-HAZ-3: ALUC Consistency.</b> Prior to issuance of a certificate of occupancy, the applicant shall demonstrate the Project has complied with the following conditions issued by the Riverside County Airport Land Use Commission (ALUC) at its July 9, 2020, meeting relative to the March Air Reserve Base/Inland Port Airport (MARB/IPA):</p> <ol style="list-style-type: none"> <li>1. Any outdoor lighting installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.</li> <li>2. The following uses/activities are not included in the proposed project and shall be prohibited at this site: <ul style="list-style-type: none"> <li>(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</li> </ul> </li> </ol>	<p>Prior to issuance of a Certificate of Occupancy</p>	<p>City Planning Division</p>	<p>Verify project complies with ALUC requirements</p>	

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		<p>navigational signal light or visual approach slope indicator.</p> <p>(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.</p> <p>(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. Such uses include landscaping utilizing water features, aquaculture, production of cereal grains, sunflower, and row crops, composting operations, trash transfer stations that are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators.)</p> <p>(d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.</p> <p>(e) Children's schools, day care centers, libraries, hospitals, skilled nursing and care facilities, congregate care facilities, hotels/motels, restaurants, places of assembly (including churches and theaters), buildings with</p>				

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		<p>more than 3 aboveground habitable floors, noise sensitive outdoor nonresidential uses, critical community infrastructure facilities and hazards to flight.</p> <p>(f) Any other uses not permitted in Accident Potential Zone II pursuant to DoDI 4165.57.</p> <p>3. Prior to issuance of any building permits, the landowner shall convey and have recorded an avigation easement to the March Inland Port Airport Authority. Contact March Joint Powers Authority at (951) 656-7000 for additional information.</p> <p>4. The attached notice [from the July 9, 2020, ALUC Staff Report] shall be given to all prospective purchasers of the property and tenants of the buildings.</p> <p>5. Any proposed detention basins or facilities shall be designed and maintained to provide for a maximum 48-hour detention period following the design storm and remain totally dry between rainfalls. Vegetation in and around the detention basins that would provide food or cover for birds would be incompatible with airport operations and shall not be utilized in project landscaping. Trees shall be spaced so as to prevent large expanses of contiguous canopy, when mature.</p> <p>Landscaping in the detention basin, if not rip-rap, should be in accordance with the guidance provided in ALUC "LANDSCAPING NEAR AIRPORTS" brochure, and the "AIRPORTS, WILDLIFE AND</p>				

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		<p>STORMWATER MANAGEMENT" brochure available at <a href="http://RCALUC.ORG">RCALUC.ORG</a> which list acceptable plants from Riverside County Landscaping Guide or other alternative landscaping as may be recommended by a qualified wildlife hazard biologist.</p> <p>A notice sign, in a form similar to that attached hereto, shall be permanently affixed to the stormwater basin with the following language: "There is an airport nearby. This stormwater basin is designed to hold stormwater for only 48 hours and not attract birds. Proper maintenance is necessary to avoid bird strikes". The sign will also include the name, telephone number or other contact information of the person or entity responsible to monitor the stormwater basin.</p> <p>6. March Air Reserve Base must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result. Sources of electromagnetic radiation include radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc.</p> <p>7. Noise attenuation measures shall be incorporated into the design of the office areas of the structure, to the extent such measures are necessary to ensure that interior noise levels from aircraft operations are at or below 45 CNEL.</p> <p>8. The project does not propose</p>				

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		<p>rooftop solar panels at this time. However, if the project were to propose solar rooftop panels in the future, the applicant/developer shall prepare a solar glare study that analyzes glare impacts, and this study shall be reviewed by the Airport Land Use Commission and March Air Reserve Base.</p> <p>9. This project has been evaluated as a proposal for 260,076 square feet of e-commerce area, 79,843 square feet of warehouse area, and 8,000 square feet of office floor area. Any increase in building area or change in use will require review by the Airport Land Use Commission. In addition, this project shall not store, process or manufacture hazardous materials without review and approval by the Airport Land Use Commission.</p> <p>Supporting documentation was provided to the Airport Land Use Commission and is available online at <a href="http://www.rcaluc.org">www.rcaluc.org</a>, click Agendas, 07-09-20 Agenda, Bookmark Agenda Item No. 3.1. Written proof of compliance shall be provided to County Planning and ALUC prior to issuance of the certificate of occupancy.</p>				
	<p>THRESHOLD f: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</p> <p>THRESHOLD g: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?</p>	<p><b>PVCCSP MM Air 2</b> shall apply; see Air Quality Section above</p>				

Impact Category	Impact	Mitigation Measures	Implementation Timing	Responsible Party	Method of Verification	City Verification of Compliance (Date/Initials)
Noise	THRESHOLD a: Would the Project result in 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>PVCCSP MM Noise 1:</b> During all project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site.	Infrequently during grading and construction	City Planning Division	Verify contract specifications include required language	
	THRESHOLD b: Would the Project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<b>PVCCSP MM Noise 2:</b> During all construction, stationary construction equipment, stockpiling and vehicle staging areas will be placed a minimum of 446 feet from the closest sensitive receptor.	Infrequently during grading and construction	City Planning Division	Verify contract specifications include required language	
		<b>PVCCSP MM Noise 3:</b> 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.	Infrequently during construction	City Planning Division	Verify contract specifications include required language	
		<b>PVCCSP MM Noise 4:</b> 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.	Infrequently during construction	City Planning Division Inspector	Verify contract specifications include required language	
Transportation	THRESHOLD a: Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<b>PVCCSP MM Trans 1:</b> Future implementing development projects shall construct on-site roadway improvements pursuant to the general alignments and right-of-way sections set forth in the PVCC Circulation Plan, except where said improvements have previously been constructed.	Prior to issuance of a Certificate of Occupancy	City Public Works and Engineering Administration Department	Verify onsite roads meet specifications	
		<b>PVCCSP MM Trans 2:</b> 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,	Prior to issuance of grading, landscaping, and street improvement	City Public Works and Engineering Administration Department	Verify sight distances	

Impact Category	Impact	Mitigation Measures	Implementation Timing	Responsible Party	Method of Verification	City Verification of Compliance (Date/Initials)
		landscape and street improvement plans. <b>PVCCSP MM Trans 5:</b> Bike racks shall be installed in all parking lots in compliance with City of Perris standards.	plans Prior to issuance of a Certificate of Occupancy	City Planning Division	Verify placement of bike racks	
	THRESHOLD d: Would the Project result in inadequate emergency access?	<b>PVCCSP MM Air 2</b> shall apply; see Air Quality Section above				
Tribal Cultural Resources	THRESHOLD a.i: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is listed or eligible for listing in the California Register of Historical resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?  THRESHOLD a.ii: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a Cultural Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported	<b>MM-CR-1</b> and <b>MM-CR-2</b> shall apply; see Cultural ResourcesSection above				

Impact Category	Impact	Mitigation Measures	Implementation Timing	Responsible Party	Method of Verification	City Verification of Compliance (Date/Initials)
	<p>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?</p>					
Wildfire	<p>THRESHOLD a: Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?</p>	<p><b>PVCCSP MM Air 2</b> shall apply; see Air Quality Section above</p>				



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# **Appendix A**

## **DRAFT EIR**

The Draft EIR and Technical Appendices may be accessed at the link below:

<https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review>