Ramona-Indian Warehouse Project

Initial Study/
Mitigated Negative Declaration No. 2373
(SCH # 2022070543)

(DPR and TPM 21-00011; PVCC SPA 21-21-05193)

November 2022 | 04823.00001.001

Submitted to:

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ACRONYMS AND ABBREVIATIONS

ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
amsl	above mean sea level
AOZ	Airport Overlay Zone
APZ	Accident Potential Zone
AQMP	Air Quality Management Plan
BMPs	best management practices
CAL FIRE	California Department of Forestry and Fire Protection
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CO_2e	carbon dioxide equivalent
County	County of Riverside
CWA	Clean Water Act
CY	cubic yard
DBESP	Determination of Biologically Equivalent or Superior Preservation
DOC	California Department of Conservation
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
EIC	Eastern Information Center
EMWD	Eastern Municipal Water District
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FMMP	Farmland Mapping and Monitoring Program
GHG	greenhouse gas
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
HELIX	HELIX Environmental Planning, Inc.
IBC	International Building Code
ICC	International Code Council
IS/MND	Initial Study/Mitigated Negative Declaration

ACRONYMS AND ABBREVIATIONS (cont.)

MARB/IPA	March Air Reserve Base/Inland Port Airport
mgd	million gallons per day
MHFP	Multi-Hazard Functional Plan
MLD	Most Likely Descendant
MRZ	Mineral Resource Zone
MT	metric ton
NAHC	Native American Heritage Commission
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OHP	Office of Historic Preservation
PVC	polyvinyl chloride
PVCCSP	Perris Valley Commerce Center Specific Plan
RCFC&WCD	Riverside County Flood Control and Water Conservation District
RWQCB	Regional Water Quality Control Board
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SDAB	San Diego Air Basin
sf	square foot/feet
SGMA	Sustainable Groundwater Management Act
SKRHCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SR	State Route
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TCR	Tribal Cultural Resource
UBC	Uniform Building Code
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VHFHSZ	Very High Fire Hazard Severity Zone
WQMP	Water Quality Management Plan

ORGANIZATION OF THE FINAL IS/MND

In accordance with the California Environmental Quality Act (CEQA; Public Resources Code Sections 21000–21189.3) and the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines) (Code of California Regulations Sections 15000–15387), this Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared to determine potentially significant impacts upon the environment resulting from the construction and operation of the Ramona-Indian Warehouse Project (Project).

In accordance with Section 15063 of the State CEQA Guidelines, this IS/MND is an analysis by the City of Perris as Lead Agency, to inform the Lead Agency decision makers, other affected agencies, and the public of potential environmental impacts associated with the implementation of the proposed Project.

The final CEQA documents for the Project include:

- **Introduction to the Final IS/MND**, which provides the context for the Final IS/MND, with applicable citation pursuant to CEQA and the State CEQA Guidelines.

- **Introduction/Project Description/Initial Study Checklist**, which provides the Project Description, a brief discussion of the existing environmental setting, and the environmental impact assessment.

- **References/List of Prepares/Appendices**, which includes a list of reference sources, list of preparers, and appendices to support the IS/MND.

- **Responses to Comments** (Appendix K), which includes a copy of each comment letter received by the City of Perris regarding the IS/MND. Although CEQA does not require the Lead Agency to provide a formal response to each of the comments received on an IS/MND, responses have nonetheless been prepared to provide the City of Perris Planning Commission with additional information upon which to base their decision.

- **Mitigation Monitoring and Reporting Program (MMRP)** (Appendix L) has been prepared pursuant to State CEQA Guidelines Section 15097 to provide a mechanism for the City of Perris to verify implementation of the mitigation measures adopted for the proposed Project.

Where comments received on the IS/MND and the responses resulted in changes to the text of the Draft IS/MND, such changes are shown in the Final IS/MND text using the following conventions:

- Text added to the Final IS/MND is shown as <u>underline</u>.

- Text deleted from the Final IS/MND is shown as ~~strikethrough~~.

The textual changes to the Final IS/MND do not constitute “substantial revisions” as defined in State CEQA Guidelines Section 15073.5(b); therefore, recirculation of the Draft IS/MND is not required.

1.0 INTRODUCTION

This section includes a description of the proposed Ramona-Indian Warehouse Project (Project) pursuant to the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines) Sections 15124 and 15125. Specifically, this section includes a description of the Project background, location, and environmental setting; a statement of objectives sought for the proposed Project; a description of the Project components; and a summary of related local and state agency approvals required to implement the Project. The Project description is used as the basis for analyzing the Project's impacts on the existing physical environment throughout this Initial Study/Mitigated Negative Declaration (IS/MND).

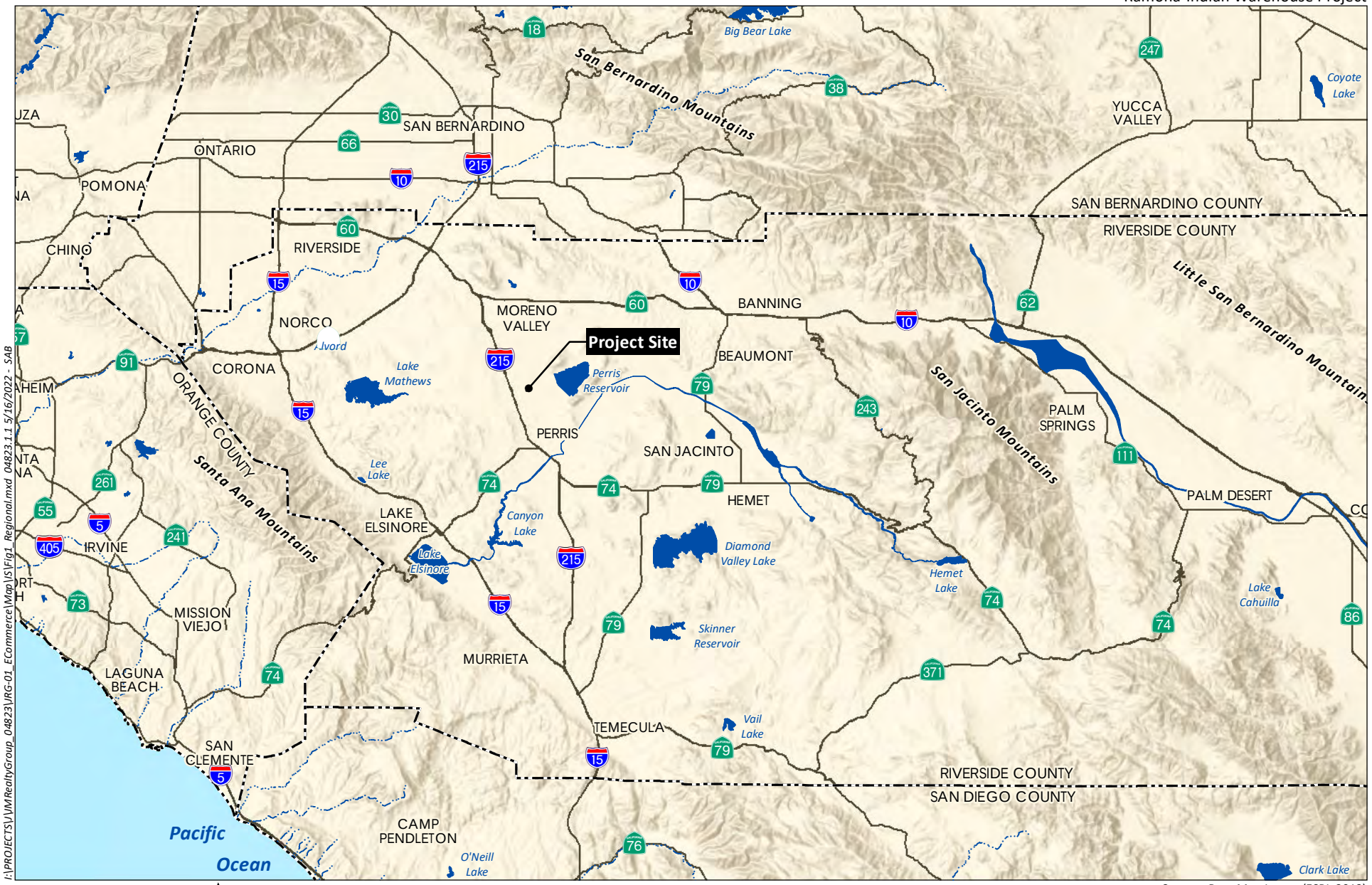
1.1 PROJECT BACKGROUND

On January 10, 2012, the City of Perris City Council adopted the Perris Valley Commerce Center Specific Plan (PVCCSP), which was prepared pursuant to the authority granted to the City of Perris (City/City of Perris) by California Government Code, Title 7, Division 1, Chapter 3, Article 8, Sections 65450 to 65457. On the same date, the City also adopted Ordinance No. 1284, adopting a Specific Plan Zoning for properties within the PVCCSP. The PVCCSP allows for the development of approximately 3,500 acres of industrial, commercial, and office uses, as well as public facilities. In conjunction with its approval of the PVCCSP, the City complied with the California Environmental Quality Act (CEQA) by preparing and certifying the PVCCSP Final Environmental Impact Report (PVCCSP EIR; State Clearinghouse No. 2009081086; City of Perris 2011), which is incorporated by reference in this IS/MND and is available for public review at the City of Perris Planning Division, 135 North D Street, Perris, California 92570 and online at https://www.cityofperris.org/departments/development-services/specific-plans.

The PVCCSP EIR is a program EIR, and project-specific evaluations in later-tier environmental documents for individual development projects within the PVCCP planning area was anticipated. The PVCCSP EIR analyzes the direct and indirect impacts resulting from implementation of the allowed development under the PVCCSP. Measures to mitigate, to the extent feasible, the significant adverse project and cumulative impacts resulting from that development are identified in the PVCCSP EIR. In conjunction with certification of the PVCCSP EIR, the City of Perris also adopted a Mitigation Monitoring and Reporting Program (MMRP). Additionally, the PVCCSP includes Standards and Guidelines to be applied to future development projects within the Specific Plan area. The City of Perris requires that future development projects within the Specific Plan area comply with the required PVCCSP Standards and Guidelines and applicable PVCCSP EIR mitigation measures as outlined in the MMRP, and that these requirements are to be implemented in a timely manner.

1.2 PROJECT LOCATION

The Project site (APN 302-060-041) is in the central portion of the PVCCSP planning area within the City of Perris and includes approximately 15 acres (14.93 acres). It is located approximately 1.4 miles east of Interstate (I-) 215, approximately 6.5 miles south of State Route (SR-) 60, and approximately 1.5 miles south of March Air Reserve Base/Inland Port Airport (MARB/IPA). Figure 1 depicts the Project site in relation to the region. Figure 2 depicts the Project site in relation to the surrounding area. Figure 3 shows an aerial photograph of the existing developed and undeveloped conditions at and surrounding the Project site. As shown, the Project site is located north of Ramona Expressway, east of Indian Avenue, and west of North Perris Boulevard.



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0 10 Miles

Source: Base Map Layers (ESRI, 2013)

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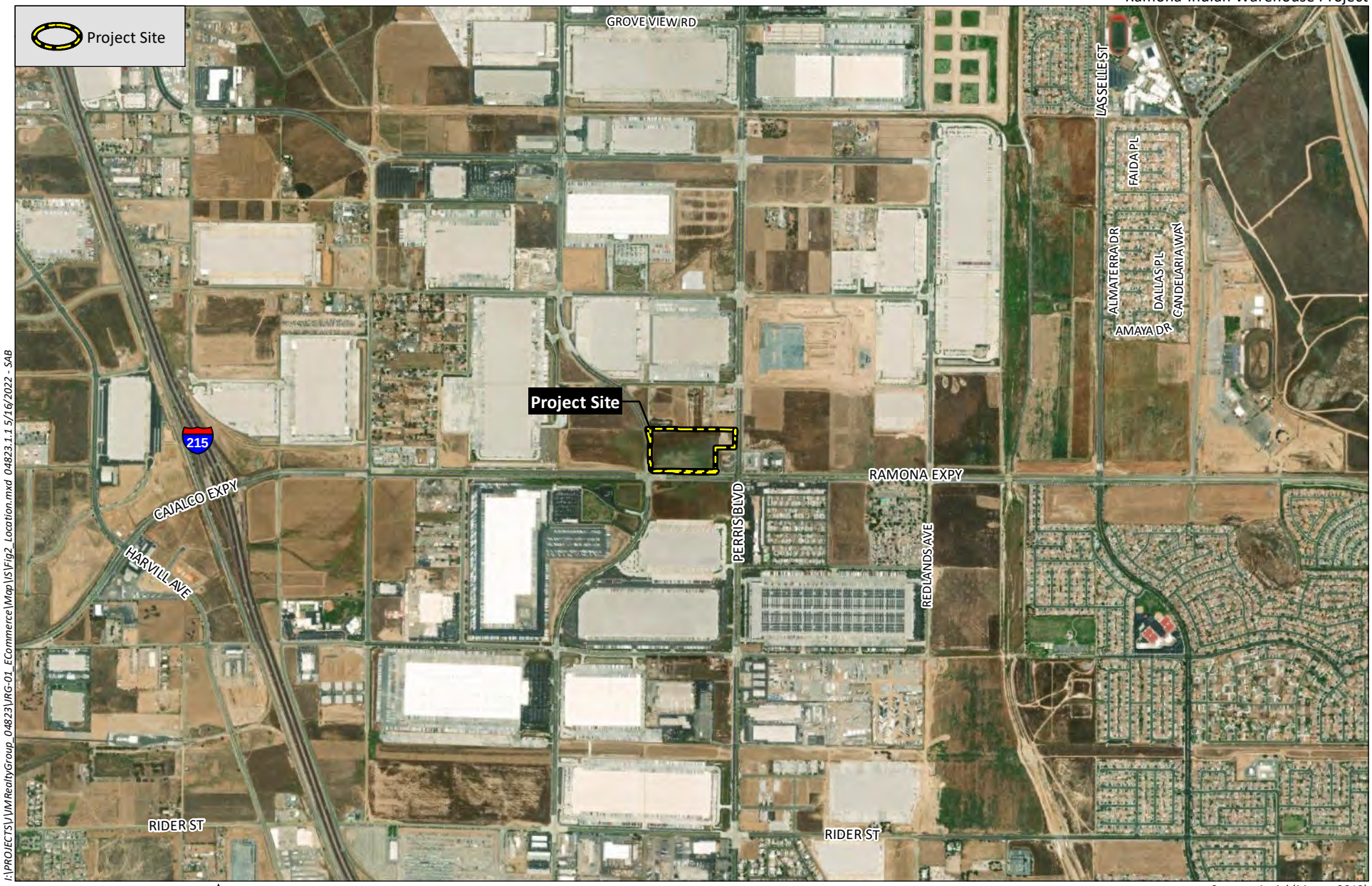
Regional Location

Figure 1



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Source: Aerial (Maxar, 2019)

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Project Location and Vicinity

Figure 2

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0 300 Feet

Source: Aerial (NearMap, 2021)

HELIX

Aerial Photo

Figure 3

1.3 ENVIRONMENTAL SETTING

The PVCCSP EIR provides a description of the environmental and regulatory setting for the entire PVCCSP planning area, including the Project site. Except for the termination of agricultural activities and the construction of development anticipated within the PVCCSP planning area, including the roadway realignment of Indian Avenue north of Ramona Expressway at the western Project boundary, the physical setting description for the Project site and adjacent areas has not notably changed since the PVCCSP EIR was certified in 2012.

Additional environmental setting or existing conditions descriptions are provided for each environmental topic analyzed in each section of this IS/MND. Additionally, updates to applicable local and regional regulatory programs have occurred since the PVCCSP EIR was certified and new regulatory programs have been adopted; these updated regulations are discussed for each topical issue, as appropriate.

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

The Project site can generally be characterized as disturbed vacant land that was previously used for agricultural purposes. The Project site is generally flat with an elevation between 1,450 and 1,460 feet above mean sea level (amsl). As the Project site is at a slightly lower elevation than surrounding roadways, stormwater runoff from surrounding areas collects at the Project site during the rainy season. The southern portion of the Project site includes a surface-level drainage swale that is owned and maintained by the Riverside County Flood Control and Water Conservation District (RCFC&WCD) and runs in an east-west direction, connecting to the Perris Valley Storm Drain about 0.75 mile east of the site near the intersection of Ramona Expressway and East Oleander Avenue.

The Project site is in an area characterized primarily by commercial, light industrial, and business professional office (BPO) land uses in varying states of development. As shown on Figure 3, the land uses surrounding the Project site include a mix of undeveloped and developed areas. Specifically, surrounding properties include undeveloped areas, and commercial development followed by industrial development to the north; a gas station and a car wash adjacent to and southeast of the Project site; undeveloped areas and commercial development to the east; and undeveloped areas followed by industrial development to the south and west. Two non-conforming single-family residences, a commercial use, and a commercial construction yard are located on a parcel adjacent to and northwest of the Project site. The closest non-conforming residential land use is located approximately 42 feet north of the Project site. These uses are in areas designated in the City of Perris General Plan 2030 and the PVCCSP for commercial and light industrial land uses, as described below. There are reports that the closest single-family residence to the Project site (adjacent to the project northwest corner) has been demolished. However, persons may still be residing at this location in recreational vehicles, so the area is considered to be occupied for the purposes of this analysis.

The existing General Plan land use designation and zoning for the Project site is Specific Plan (i.e., the PVCCSP). As shown on Figure 3, the PVCCSP land use designation for the Project site is Commercial. Commercial land use designations are also identified immediately to the northeast, east and south of the Project site. Light Industrial designations occur along the north-central property boundary and further to the north, as well as to the west. The small parcel northwest of the Project site boundary which currently contains residential uses is designated as Commercial in the PVCCSP, and the parcels north of the Project site containing residential uses are designated as Light Industrial in the PVCCSP. The existing residential land uses are non-conforming with the PVCCSP.

The Project site is located approximately 1.5 miles south of MARB/IPA and is located within the MARB/IPA Airport Influence Area Boundary, and the 2018 U.S. Air Force Final Air Installations Compatible Use Zone (AICUZ) Study. The PVCCSP includes an Airport Overlay Zone (AOZ) which defines specific land uses corresponding generally with the boundaries and provisions of the 2014 MARB/IPA Airport Land Use Compatibility Plan (ALUCP) and airport influence area. The Project site is within Airport Compatibility Zone B1 (Inner Approach/Departure Zone)/Accident Potential Zone (APZ) Zone II and C1 (Primary Approach/Departure Zone). Development within these airport compatibility zones is restricted by the basic compatibility criteria provided in Table MA-2 of the 2014 MARB/IPA ALUCP which is consistent with the safety and noise standards contained within the 2018 AICUZ Study. Airport Compatibility Zone B1 is a high noise zone. No new dwellings are allowed in this zone unless permitted by local land use regulations, and prohibited uses include noise sensitive land uses and other uses which would cause hazards to flight. Airport Compatibility Zone C1 is a primary approach/departure zone with limited residential land uses and prohibits noise sensitive land uses and other uses which would cause hazards to flight.

The Project site is within the Mead Valley Area Plan of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and is not within an MSHCP Criteria Cell, Core, or Linkage Area. The Project site is also not in a survey area for mammals, amphibians, Criteria Area Plant Species Survey Area, or Narrow Endemic Plant Species Survey Area. The Project site is within the burrowing owl (BUOW; *Athene cunicularia*) survey area. Vernal pool resources within the Project site consist of ephemeral pools in the northeast corner.

1.4 PROJECT OBJECTIVES

The applicant's goal for the proposed Project is to provide for the orderly development of a warehouse building in the northern portion of the City, near the designated truck route and within the MARB/IPA APZ Zone II, to increase employment opportunities in a housing-rich area, provide development compatible with the MARB/IPA ALUCP, and protect the MARB/IPA as outlined by the PVCCSP. This goal aligns with various aspects of the Southern California Association of Governments' (SCAG's) Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS; 2020), primarily related to accommodating goods movement industries and balancing job and housing opportunities in local areas to reduce long commutes from home to work. SCAG identifies the Inland Empire as a housing-rich area and coastal communities as job-rich areas and is striving in its policies to achieve more equal balances locally. The Project applicant also seeks to help implement the City's Storm Water Protection Plan by constructing a portion of the Line E storm drain in addition to the Project's utility infrastructure.

1.5 PROJECT COMPONENTS

The proposed Project involves the adoption of a Specific Plan Amendment to the PVCCSP and approval of a parcel map and Development Plan to allow the construction and operation of a multi-tenant distribution building that allows for warehousing, showroom, and office uses. The components of the Project are further described below.

Specific Plan Amendment

It is the intent of the PVCCSP to facilitate development of the area in an orderly and consistent fashion that is coordinated with the provision of necessary infrastructure and public improvements. Land use categories in the PVCCSP include Industrial, Business/Professional Office, Commercial, Residential, and Public. Zoning categories in the PVCCSP include General Industrial, Light Industrial, Business/ Professional Office, Commercial, Residential, Multi-Family Residential, and Public. The majority of the PVCCSP planning area is designated for Light Industrial and General Industrial development and identifies areas along Ramona Expressway at the east and west ends of the PVCCSP boundary, including the Project site, for Commercial development. The section of the PVCCSP that would be amended by the proposed Specific Plan Amendment is described below.

Land Use Plan

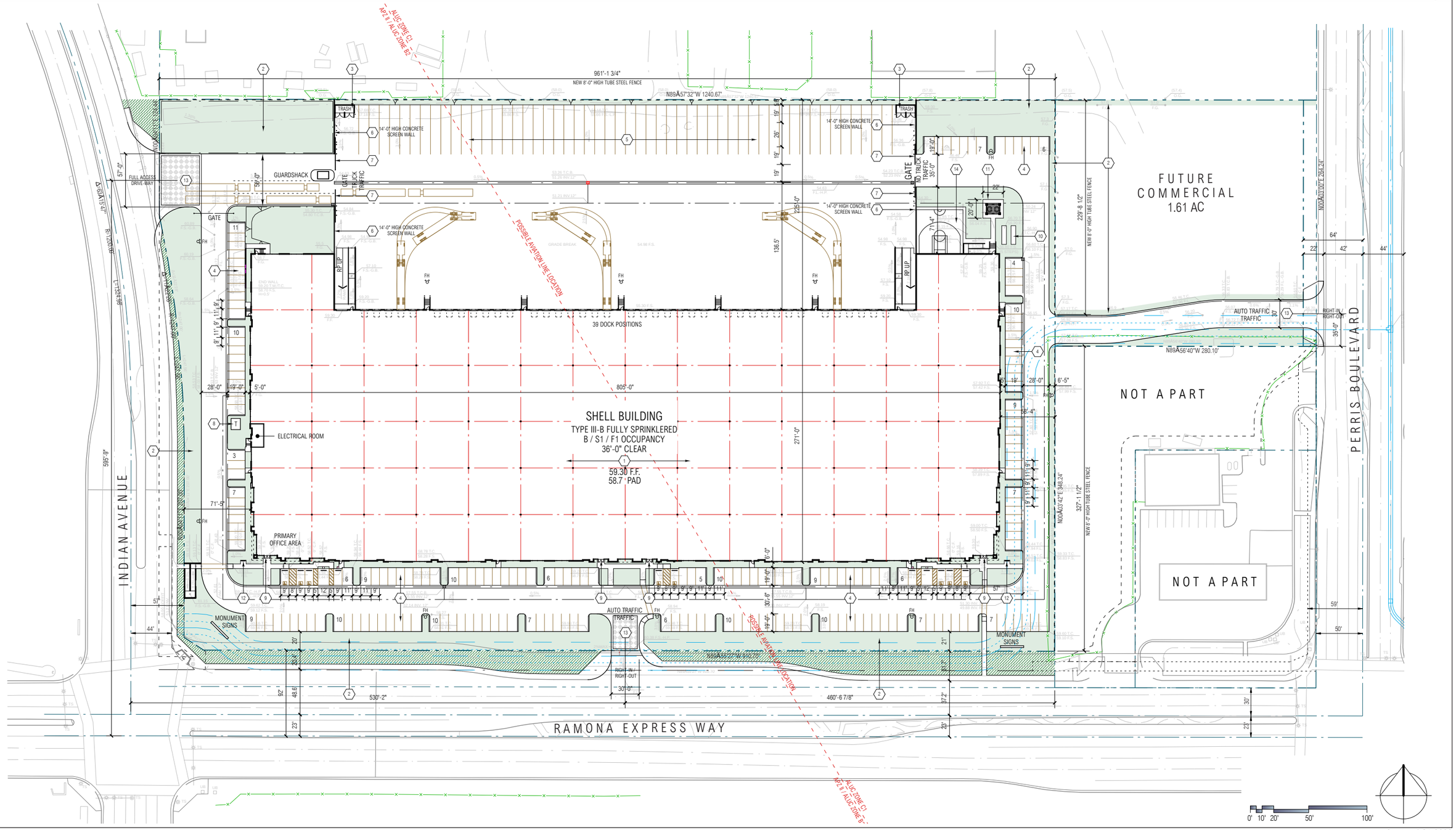
Section 2.0 of the PVCCSP contains the Land Use Plan and defines land use categories and zones throughout the PVCCSP and details permitted, conditionally permitted, accessory, and prohibited uses for each zone. The PVCCSP designates the Project site as a Commercial land use and zone; however, the proposed amendment to the PVCCSP would replace the existing Commercial land use and zoning designation at the Project site with a Light Industrial land use and zoning designation for approximately 13 acres. Land use and zoning designations for the remaining two acres in the northeastern portion of the Project site would not be modified as part of the Project and would continue to be designated Commercial.

The PVCCSP defines Light Industrial as the following: This zone provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous products/materials, and retail related to manufacturing. This zone correlates with the Light Industrial General Plan Land Use designation. The proposed Project falls within the category of warehouse and distribution services.

Development Plan

Light Industrial Use

The proposed Project involves the development of a light industrial multi-tenant distribution building on approximately 13 acres of the approximately 15-acre Project site. As shown on Figure 4, the Project includes the development of a rectangular 232,575-square-foot (sf) non-refrigerated warehouse building that includes 10,000 sf of ancillary office space, with 215 parking stalls, 52 trailer parking stalls and 39 dock positions that would support warehousing, showroom, and office uses within a single building.



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Source: RGA 2022

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Site Plan

Figure 4

Primary office areas run along the southern part of the building facing Ramona Expressway. Buildings exceeding 100,000 sf are required to provide employee amenities such as, but not limited to, cafeterias, exercise rooms, locker rooms and shower, walking trails and recreational facilities. Inclusion of theses amenities in the Project would encourage employee trip reduction, reducing associated transportation pollutant emissions.

In general, the architectural style of the light industrial building consists of modern industrial design, as shown on Figure 5. The buildings would be constructed of painted concrete tilt-up panels and low-reflective materials, including low-reflective glass. The exterior color palette would be comprised of various shades of white, gray, and blue. The proposed buildings would be a maximum of 48 feet in height above the exterior finished grade. Visual relief from building form would be achieved through building articulation, variations in height and rooflines, and the incorporation of landscaping, including trees. The architectural elements and landscaping would avoid monotony and repetition in building elevations and would minimize glare. Rooftop equipment would be screened and not visible from the street.

A key objective of the PVCCSP is to promote sustainable development and to encourage the use of "green" technologies. In accordance with PVCCSP EIR mitigation measure MM Air 19, the Project would be constructed to implement, at a minimum, an increase in building energy efficiency 15 percent beyond California Title 24 Energy Efficiency Standards for Nonresidential Buildings and reduce water use by 25 percent. There is no rooftop solar proposed at this time as the project site is within the final approach area to MARB/IPA. Should solar be proposed in the future, Condition 10 of the ALUC approval of the project (Riverside County Airport Land Use Commission 2022) requires a separate solar glare study be submitted and reviewed by the Airport Land Use Commission and MARB/IPA.

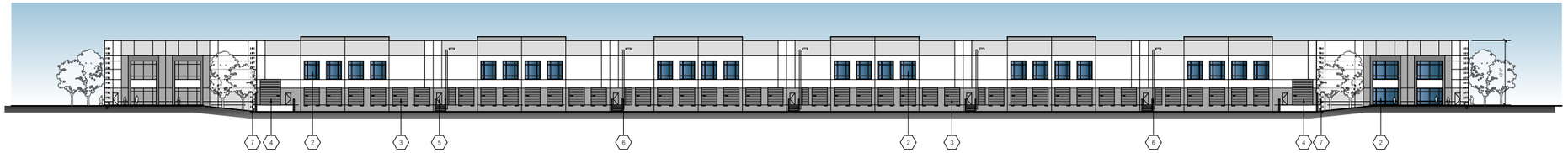
Commercial Pad

The 1.61 acres in the northeastern portion of the Project site designated for Commercial land use would continue to be available for future commercial use. This reserved commercial development pad is intended to improve and extend the commercial corridor along Perris Boulevard further north and south of the Project site. Development of the commercial pad is not proposed as part of the Project application; however, development of a 125-room hotel has been assumed as part of this environmental analysis. Until development of the commercial pad occurs, temporary staging activities may occur in this area to support construction of the light industrial uses described above.

Access, Circulation, and Parking

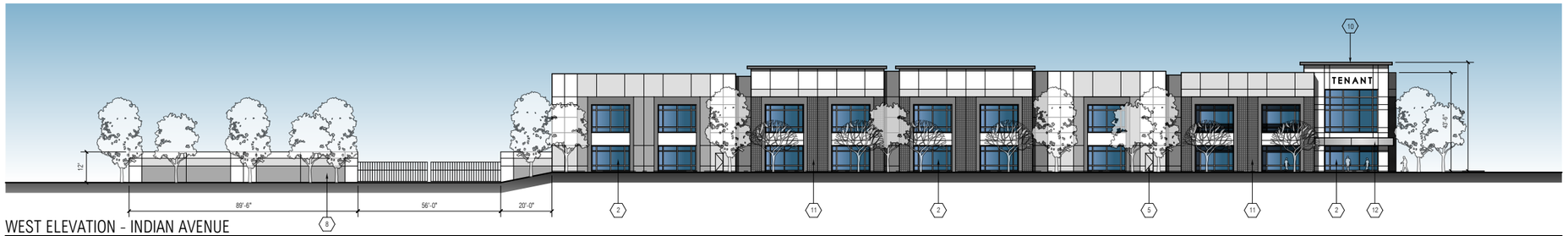
Vehicular Circulation

The Project has been designed to comply with applicable PVCCSP standards and guidelines to minimize vehicular conflict and to address shared access as well as large truck maneuverability. Site access would be provided for personal vehicles from Ramona Expressway. Truck traffic and commercial traffic would enter and exit the Project site from Indian Avenue. One driveway near the center of the Project site along Ramona Expressway would provide non-commercial truck access to the site. Commercial trucks would enter the site from a 56-foot-wide driveway in the northwestern part of the Project site. As commercial trucks enter the Project site, they would pass through a guarded entrance gate before parking to one of the proposed 39 dock positions on the north side of the proposed distribution building.



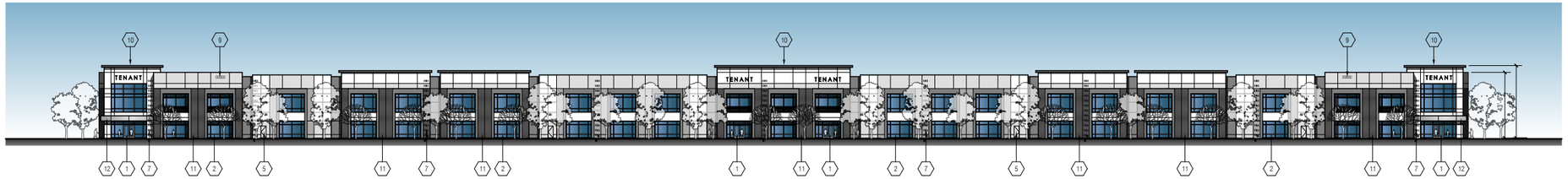
SOUTH ELEVATION

SCALE: 1" = 30'-0"



WEST ELEVATION - INDIAN AVENUE

SCALE: 1" = 20'-0"



SOUTH ELEVATION - RAMONA EXPRESSWAY

SCALE: 1" = 30'-0"

EAST ELEVATION

SCALE: 1" = 20'-0"

FINISH SCHEDULE

P-1

P-2

P-3

P-4

P-5

GL-1

M-1

FINISH SCHEDULE

CODE	MATERIAL	DESCRIPTION
P-1	BASE ACCENT COLOR	SW 7063 - NEBULOUS WHITE
P-2	ACCENT COLOR	SW 7650 - ELLIE GRAY
P-3	ACCENT COLOR	SW 7067 - CITYSCAPE
P-4	ACCENT COLOR - BASE COLOR	SW 7069 - GRIZZLE GRAY
P-5	STONE - BRICK MATERIAL	STONE - BRICK MATERIAL
GL-1	GLAZING	PPG SOLARCOOL PACIFICA
M-1	MULLIONS	CLEAR ANODIZED

Source: RGA 2022

Truck access will be restricted to Indian Avenue. Trucks would enter the project site via left turn from Indian Avenue. Trucks would exit the project site via right turn out the west gate to Indian Avenue, Indian Avenue to Harley Knox Boulevard, and Harley Knox north to I-215. The proposed Project would include roadway improvements for Ramona Expressway, Indian Avenue, and Perris Boulevard. Ramona Expressway is an east-west oriented roadway located along the Project's southern boundary. Ramona Expressway is currently constructed at its ultimate half-section pavement width as an Expressway (184-foot right-of-way) between the western and eastern boundaries consistent with the PVCCSP and the City of Perris General Plan Circulation Element. In addition, per the City of Perris Bikeway Master Plan, a Class I Multipurpose Trail behind the curb with appropriate signage at the Ramona Expressway intersections will be installed.

Indian Avenue is a north-south oriented roadway located along the Project's western boundary. Indian Avenue is currently constructed at its ultimate half-section pavement width as a Secondary (94-foot right-of-way) between the Project's northern and southern boundaries consistent with the PVCCSP and the City of Perris General Plan Circulation Element. In addition, the project frontage will be improved to provide for a landscaped parkway and streetlights.

Perris Boulevard is a north-south oriented roadway located along the Project's eastern boundary. Perris Boulevard is currently constructed at its ultimate half-section pavement width as an Arterial (128-foot right-of-way) between the northern and southern boundaries consistent with the PVCCSP and the City of Perris General Plan Circulation Element. In addition, a Class I multipurpose trail, landscaped parkway, and streetlights will be installed per City of Perris, County of Riverside, and Caltrans standards.

The proposed Project would include site access improvements for Ramona Expressway, Indian Avenue, and Perris Boulevard.

Indian Avenue and Driveway 1 – Install a stop control on the westbound approach and construct the intersection with the following geometrics:

- Northbound Avenue: One through lane and one shared through-right turn lane.
- Southbound Approach: One left turn lane with a minimum of 200-feet of storage and two through lanes
- Eastbound Approach: Not Applicable (N/A)
- Westbound Approach (Project Driveway 1): One right turn only lane
- Due to the low traffic volumes making right turns into the driveway, a right turn deceleration lane is not required for traffic operations

Ramona Expressway and Driveway 2 – Install a stop control on the southbound approach and construct the intersection with the following geometrics:

- Northbound Approach: N/A
- Southbound Approach (Project Driveway 2): One right turn only lane
- Eastbound Approach: Three through lanes

- Westbound Approach: Three through lanes and one right turn only lane with a minimum of 100 feet of storage

- An acceleration/deceleration lane will be installed along the Ramona Expressway frontage. The right-of-way will accommodate a raised landscaped media, three travel lanes, and the acceleration/deceleration lane.

Perris Boulevard and Driveway 3 – Install a stop control on the eastbound approach and construct the intersection with the following geometrics:

- Northbound Approach: Three through lanes

- Southbound Approach: Two through lanes and one shared through-right turn lane

- Eastbound Approach (Project Driveway 3): One right turn only lane

- Westbound Approach: N/A

- Due to the low traffic volumes making right turns into the driveway, a right turn deceleration lane is not required for traffic operations

Wherever necessary, roadways adjacent to the Project site, site access points and site-adjacent intersections will be constructed to be consistent with the identified roadway classification and respective cross-sections in the PVCCSP or City of Perris General Plan Circulation Element.

Non-Vehicular Circulation

The Rider Street Bike Trail runs east to west from Ramona Expressway to East Frontage Road and would be accessible from the Project site (City of Perris 2021). Twenty bike stalls are proposed to be installed in several alcoves adjacent to the primary office area and main entrances. The buildings are proposed to be oriented so that entrances and entry access points are easily identified from a distance by pedestrians and/or vehicular traffic. Loading areas and employee parking lots would be located at the west, south, and east side of the warehouse building. The truck area at the north end of the property would be separated by a gate from passenger car parking. Furthermore, crosswalks would be installed at intersections to ensure pedestrian safety.

Parking

The Project has been designed to comply with Section 4.2.2.4 of the PVCCSP and Chapter 19.69 of the City's Zoning Ordinance related to parking requirements. Parking for employees and non-commercial trucks would be provided around most of the building, except for the north side where truck docks would be located, as well as along the northern-central boundary of the site. The Project would include a total of 215 automobile parking stalls on-site, which would exceed the requirements outlined in the City's Zoning Ordinance. Automobile parking would consist of standard spaces, van accessible spaces, clean air/vanpool/electric vehicle spaces and accessible spaces. A parking lot with 52 trailer parking stalls, 39 dock positions, and 2 garage doors would be located in the northern portion of the Project site. Pursuant to Section 5.106.5.2 of the CALGreen Code, 26 of the automobile parking spaces (12 percent of total) will be designated for low-emitting, fuel efficient, and carpool/vanpool vehicles. Pursuant to

Section 5.106.5.3.2 of the CALGreen Code, 22 of those designated parking spaces (10 percent of total) will provide infrastructure for the future charging of electric vehicles.

Landscape, Lighting, and Screen Walls

Landscape and Hardscape

The PVCCSP requires a minimum 12 percent landscape coverage for development in Light Industrial areas. The proposed Project landscape coverage includes 13.5 percent of the Project site. Landscape materials would include a variety of trees (e.g., for accent, screening, shade, and street), and shrubs (e.g., for accent, groundcover, screening). Proposed plant materials would have either low or moderate water needs and would be consistent with Section 6.1.3 of the PVCCSP, On-Site Plant Palette, or if approved by the City, plants that are consistent with California Friendly Landscape and that meet all minimum City of Perris Water Conservation Requirements, as defined in Chapter 19.70 of the City's Zoning Ordinance.

Screen Walls

A combination of screen walls and fencing would be provided at the Project site for screening, privacy, noise control, and security. Eight-foot-high wrought-iron fencing would be installed at the entrance and exit of the truck yard, adjacent to a pair of 14-foot-high concrete tilt-up screen walls. The eight-foot-high fence would extend around the perimeter of the Project site, with the exception of the interface with the car wash to the south, which already includes an existing wall directly along the property line, and a 13-foot wall along the project's northern boundary between the delivery area and the existing residential areas to the north.

Lighting

Section 4.2.4 of the PVCCSP addresses lighting standards and guidelines, including general lighting, decorative lighting, and parking lot lighting standards. The Project would comply with applicable lighting standards and guidelines, and with lighting standards established by the City, the CALGreen Code, and Title 24 Energy Efficiency Standards. The Project would include lighting elements for safety and security of the proposed development. New sources of light would primarily include parking lot lighting and outdoor security lighting for the proposed buildings. Lighting improvements on site would be shielded to avoid light pollution on neighboring properties and surrounding roadways, and to protect aircraft from glint and glare on final approach to MARB/IPA.

Utilities and Infrastructure

Utilities on the Project site would tie-into existing utility systems. A 10-inch fire water service and 3-inch domestic service connection to the existing 12-inch polyvinyl chloride (PVC) water main in Indian Ave is proposed with a manifold and single connection to the existing line. Two 2-inch irrigation connections, one off-site and one on-site, are proposed to also connect to the existing 12-inch PVC water main in Indian Ave with a single connection to the existing line. A second 10-inch fire water service connection is proposed to connect to the existing 39-inch water main in Perris Boulevard. A 6-inch sewer lateral is proposed to connect to the existing 10-inch vitrified clay sewer main in Perris Boulevard.

Natural Gas Service

Natural gas service will be provided to the Project by Southern California Gas (SoCal Gas). Existing natural gas transmission pipelines and local service pipelines run in the Perris Boulevard corridor along the eastern edge of the Property. The property owner will apply to SoCal Gas to establish an industrial and commercial customer connection through an approved industrial and approved commercial service connection at the northeast corner of the Property. The industrial connection will feed an industrial natural gas meter on the east side of the proposed building. The commercial connection will feed a commercial natural gas meter on the north side of the proposed commercial pad.

Electric Service

Electric Service will be provided to the Project by Southern California Edison (SoCal Edison). Existing local service electrical transmission lines run in the Perris Boulevard corridor along the eastern edge of the Property. The property owner will apply to SoCal Edison to establish and industrial and commercial customer connection through an approved industrial and commercial connection on the northeast corner of the Property. The industrial connection will feed an industrial electric transformer and meter on the east side of the proposed building. The commercial connection will feed a commercial electric transformer and meter on the north side of the proposed commercial pad.

Drainage

The Perris Valley Master Drainage Plan (MDP) includes future storm drain and detention basins to capture surface runoff and convey it into underground storm drains before continuing to the Perris Valley storm drain system. Runoff from the Project site will be collected via on-site private catch basins and conveyed via on-site private storm drain pipes to a proposed underground Best Management Practice (BMP) basin in the northeasterly portion of the Project site. As directed by the City, the Project applicant plans to construct a portion of the MDP Line E flood control facility as part of this project and also construct a 30-inch-diameter lateral pipe that can connect into the existing Perris Valley MDP Lateral Line E-11 in Perris Boulevard. The outlet pipe from the proposed on-site BMP basin will connect into the flood control facility and a proposed temporary low-flow pump will be used to direct the flows towards the existing Perris Valley MDP Lateral Line E-11 via the 30-inch diameter lateral pipe. This interim proposed connection of Line E would be in place until such time as the City constructs additional downstream sections of the Line E storm drain. Those future Line E extensions are not part of the Project and not required to meet the Project storm water or water quality requirements.

Project Operations

The proposed Project would involve the operation of warehouse and ancillary office uses within a single building consisting of 232,575 sf of development and the future operation of commercial uses on a separate building pad in the northeast corner of the Project site. At the time this IS/MND was prepared, the future occupants of the proposed buildings were unknown. For purposes of this evaluation, the warehouse building is assumed to be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night.

The buildings are designed such that business operations would be conducted within the enclosed building, except for traffic movement, parking, and the loading, and unloading of truck trailers at designated loading bays. Infrastructure would be installed so that outdoor cargo handling equipment used during loading, and unloading of trailers (e.g., yard trucks, hostlers, yard goats, pallet jacks,

forklifts) can be non-diesel powered per contemporary industry standards. As a practical matter, dock doors on warehouse buildings are not occupied by a truck at all times of the day. There are typically many more dock door positions on warehouse buildings than are needed for receiving and shipping volumes. The dock doors that are in use at any given time are usually selected based on interior building operation efficiencies. In other words, trucks ideally dock in the position closest to where the goods carried by the truck are stored inside the warehouse. As a result, many dock door positions are frequently inactive throughout the day. Pursuant to State law, on-road diesel-fueled trucks are required to comply with various air quality and greenhouse gas emission standards, including but not limited to the type of fuel used, engine model year stipulations, aerodynamic features, and idling time restrictions. Compliance with State law is mandatory and inspections of on-road diesel trucks subject to applicable State laws are conducted by the California Air Resources Board (CARB).

Construction Activities

It is estimated that construction of the Project would occur in phases over an approximately 18-month period beginning in 2022. The estimated construction phase durations, which are also used throughout the environmental analysis in this IS/MND, are summarized in Table 1. This construction schedule represents a conservative analysis scenario should construction occur any time after the estimated dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. Phase 1 would include the construction of the warehouse building, associated parking areas, storm drain line E, and roadway improvements. Phase 2 represents the construction of the commercial pad with a 125-room hotel. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction equipment known at the time this IS/MND was prepared.

Table 1
ESTIMATED CONSTRUCTION DURATION

Construction Activity	Construction Period Start	Construction Period End	Number of Working Days
Phase 1 Site Preparation	10/1/2022	10/14/2022	10
Phase 1 Grading	10/15/2022	11/14/2022	21
Phase 1 Underground Utilities/Line E	10/15/2022	2/14/2023	87
Phase 1 Building Construction	12/12/2022	2/2/2024	300
Phase 1 Paving	2/3/2024	3/1/2024	20
Phase 1 Architectural Coatings	3/2/2024	3/29/2024	20
Phase 2 Site Preparation	7/1/2025	7/2/2025	2
Phase 2 Grading	7/3/2025	7/8/2025	4
Phase 2 Building Construction	7/9/2025	4/14/2026	200
Phase 2 Architectural Coatings	2/15/2025	4/14/2025	42
Phase 2 Paving	4/15/2025	4/28/2025	10

Source: JM Realty

The Project would generate a total demand for 28,823 cubic yards (CY) of import and create 12,981 CY of fill, resulting in 15,842 CY of total import required.

Construction activity is regulated by the City's Municipal Code, Section 7.34.060, which allows construction activities during daytime hours (between the hours of 7:00 am and 7:00 pm), Monday through Saturday, except for legal holidays. Construction equipment is expected to operate on the

Project site up to eight hours per day during the allowed days and time period; however, the typical working hours for most construction contractors are 7:00 AM to 4:00 PM, and construction equipment is not in continual use; each piece of equipment is used only periodically during a typical construction workday. Should construction activities need to occur outside of the hours permitted by the Municipal Code, the Project Applicant would be required to obtain authorization from the City. Should on-site concrete pouring activities need to occur at night to facilitate proper concrete curing, pours would typically occur between the approximate hours of 2:00 am and 8:00 am.

Lights may be used within the construction areas, notably the construction staging areas, to provide security for construction equipment and construction materials. Further, in the event that construction-related activities occur during nighttime hours on the Project site, temporary, overhead artificial lighting would be provided to illuminate the work area.

Construction workers would travel to the Project site by passenger vehicle and materials deliveries would occur by medium- and heavy-duty trucks. Construction of the Project would require common construction equipment. The site-specific construction fleet may vary due to specific needs at the time of construction; however, a summary of construction equipment assumptions by construction phase used for purposes of analysis is provided in Table 2.

Table 2
CONSTRUCTION EQUIPMENT ASSUMPTIONS

Equipment	Horsepower	Number	Hours/Day
Phase 1 Site Preparation			
Rubber Tired Dozers	247	3	8
Tractors/Loaders/Backhoes	97	4	8
Water Trucks	402	1	8
Phase 1 Grading			
Excavators	158	2	8
Graders	187	1	8
Rubber Tired Dozers	247	1	8
Scrapers	367	2	8
Tractors/Loaders/Backhoes	97	2	8
Phase 1 Underground Utilities/Line E			
Cranes	231	1	2
Excavators	158	1	8
Rubber Tired Loaders	203	1	8
Tractors/Loaders/Backhoes	97	1	1
Water Trucks	402	1	8
Phase 1 Building Construction			
Cranes	231	1	7
Forklifts	89	3	8
Generator Sets	84	1	8
Tractors/Loaders/Backhoes	97	3	7
Welders	46	1	8
Water Trucks	402	1	8
Phase 1 Architectural Coating			
Air Compressors	78	1	6

Equipment	Horsepower	Number	Hours/Day
Phase 1 Paving			
Pavers	130	2	8
Paving Equipment	132	2	8
Rollers	80	2	8
Phase 2 Site Preparation			
Graders	187	1	8
Rubber Tired Dozers	247	1	8
Tractors/Loaders/Backhoes	97	1	8
Water Trucks	402	1	4
Phase 2 Grading			
Graders	187	1	8
Rubber Tired Dozers	247	1	8
Tractors/Loaders/Backhoes	97	2	7
Water Trucks	402	1	4
Phase 2 Building Construction			
Cranes	231	1	6
Forklifts	89	1	6
Generator Sets	84	1	8
Tractors/Loaders/Backhoes	97	1	6
Welders	46	3	8
Water Trucks	402	1	4
Phase 2 Architectural Coating			
Air Compressors	78	1	6
Phase 2 Paving			
Cement and Mortar Mixers	9	1	6
Pavers	130	1	6
Paving Equipment	132	1	8
Rollers	80	1	7
Tractors/Loaders/Backhoes	97	1	8

Source: CalEEMod; Appendix A

1.6 SUMMARY OF REQUESTED ACTIONS

The City has primary approval responsibility for the Project and is identified as the CEQA Lead Agency for the IS/MND, pursuant to State CEQA Guidelines Section 15050. As stated in PVCCSP Section 13.0, the City Council is the decision-making authority for the requested discretionary applications (e.g., the Specific Plan Amendment and Project Development Plan). The City's Planning Commission will consider the Specific Plan Amendment, Project Development Plan, and the Final IS/MND and make a recommendation to City Council whether the Project and Final IS/MND should be approved. The City Council will make the ultimate decision if the Final IS/MND should be approved and whether to approve, approve with changes, or deny the Project. In the event of approval of the Project, the City would subsequently conduct administrative reviews and issue ministerial permits and approvals to implement Project requirements and conditions of approval.

The Final IS/MND informs state, regional, and local government approvals needed for construction and/or operation of the Project, regardless of whether such actions are known at this time or explicitly listed. A list of the anticipated actions under City jurisdiction is provided in Table 3. In addition, other actions may be necessary from other government agencies to fully implement the Project. Table 3 also

lists the government agencies that may be required to use the IS/MND during their consultation and review of the Project and its implementing actions and provides a summary of the anticipated subsequent actions associated with the Project.

Table 3
PROJECT RELATED APPROVALS/PERMITS

Agency	Approvals and Decisions
Discretionary Approvals	
City of Perris City Council	• Approval of the IS/MND (Case No. 21-00011) • Specific Plan Amendment (Case No. 21-05193) • Zoning Ordinance No. 1284 Amendment (Case No. 21-00011) • Tentative Map (Case No. 21-00011) • Development Plan Review (DPR) (Case No. 21-00011) • MSHCP/DBESP Compliance Verification
Riverside County Airport Land Use Commission	• Consistency Review
California Department of Fish and Wildlife (CDFW)	• Streambed Alteration Agreement
Non-Discretionary Approvals	
City of Perris Development Services	• All on-site plans, including grading, drainage, and utilities • Water Quality Management Plan (WQMP)
Regional Water Quality Control Board (RWQCB)	• Issuance of a Construction Activity General Construction Permit • Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit • Report of Waste Discharge or Water Quality Certification
Riverside County Flood Control & Water Conservation District (RCFC&WCD)	• Encroachment permit for construction in RCFC&WCD right-of-way
South Coast Air Quality Management District (SCAQMD)	• Permits to construct and/or permits to operate new stationary sources of equipment that emit or control air contaminants, such as heating, ventilation, and air conditioning (HVAC) units
Other Utility Agencies	• Permits and associated approvals, as necessary for the installation of new utility infrastructure or connections to existing facilities
U.S. Army Corps of Engineers (USACE)	• Concurrence of no waters of U.S.

2.0 DETERMINATION

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

☐	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
■	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature _____ Date _____

Printed name _____ For _____

3.0 ENVIRONMENTAL INITIAL STUDY CHECKLIST

The lead agency has defined the column headings in the environmental checklist as follows:

A. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

B. "Less Than Significant with Mitigation Incorporated" applies where the inclusion of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." All mitigation measures are described, including a brief explanation of how the measures reduce the effect to a less than significant level. Mitigation measures from earlier analyses may be cross-referenced.

C. "Less Than Significant Impact" applies where the project does not create an impact that exceeds a stated significance threshold.

D. "No Impact" applies where a project does not create an impact in that category. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project specific screening analysis).

I. Aesthetics

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

Applicable PVCCSP Standards and Guidelines

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

On-Site Design Standards and Guidelines (Chapter 4.0 of the PVCCSP)

4.1 Perris Valley Commerce Center On-Site Development Standards

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

4.2 On-Site Standards and Guidelines

4.2.1 General On-Site Project Development Standards and Guidelines

Properties within the PVCCSP shall be developed in general conformance with the Land Use Plan. Use and development standards will be in accordance with the City of Perris Municipal Code Chapter 19 (Zoning/Land Use Ordinance) as amended by the PVCCSP zoning ordinance, and further defined by the Specific Plan objectives, design guidelines, as well as future detailed development proposals include subdivisions, development plans, and conditional use permits.

Accident Potential Zones. All proposed projects that lie within APZs must comply with AOZ Standards.

4.2.2 Site Layout for Commerce Zones

Building Orientation/Placement. Accentuate public streets by locating building frontages and their entrances toward public right-of-way. Buildings should be orientated so that entrances and entry access points are easily identified from a distance by pedestrians and/or vehicular traffic. Reinforce entries with architectural material, and landscape features so they are clearly identifiable. Loading areas and employee parking lots should be located at the side and rear of buildings when possible. Promoting walkability and circulation is encouraged through placement of buildings and pedestrian circulation facilities. Buildings shall be designed to avoid placement within 100 feet of the extended runway and centerline of the airport. Utilize building placement, accented walls, or unique design to effectively screen views of loading docks, storage area, and/or outdoor work areas that would otherwise be visible to public view.

Vehicular Access and On-Site Circulation. Site design should address the intended functions of the facilities beginning with safe, definable site access that creates a sense of arrival. Truck routes are required for trucks having a maximum gross weight of 5 tons. These routes should avoid conflicts with established communities and be separated from passenger vehicles where possible. Site access should promote safety, efficiency, convenience, and minimize conflict between employee/customer vehicles and large trucks by creating separate access points when possible. Screen Loading Docks When possible, loading areas should be located on the side or rear of a site and shall be screened from public view. When loading areas are located in the Visual Overlay Zone, special consideration to the visible aesthetics of screen walls, fences and landscaping should be considered.

Acceptable screening methods include building offsets, connecting wing walls, perimeter site walls and fences, landscaping, and berming. Such screen walls should be architecturally integrated with building by design, color, and material. Screen walls shall be of the same design and materials as primary buildings and a minimum of 6 feet high so as to sufficiently screen loading docks. Screen walls exceeding 8 feet in height shall be softened with earthen berms and dense landscape. The screening of outdoor storage areas, outdoor work areas (where permitted), and mechanical equipment with walls that utilize the same building materials and architectural design of the buildings is required. Soften screen walls with earth berms and dense landscaping. The intent is to keep walls as low and unobtrusive as possible while performing their screening and security functions.

Outdoor Storage. Outdoor storage is limited to the General Industrial Zone of the Perris Valley Commerce Center (PVCC). No other outdoor storage will be permitted, with the exception of accessory uses for outdoor storage directly associated with and incidental to the primary use occupying less than 10% of the site or floor area.

Water Quality Site Design. Most developments are required to implement a Water Quality Management Plan (WQMP) in accordance with the most recently adopted Riverside County MS4 NPDES Permit (Board Order R8-2010-0033. Approval by the City of a WQMP plan requires submittal of a complete document with supporting data which includes at a minimum, a site “Post-Construction Best Management Practice (BMP) Plan,” and treatment control facility sizing calculations. Site design, based on Low Impact Design, and Source Control BMPs must be incorporated into the civil site design. If these two types of BMPs do not sufficiently manage hydromodification or treat expected pollutants, treatment control facilities must be implemented in order to assure proper pollutant treatment.

Treatment control BMPs are in accordance with Riverside County Storm Water Best Management Practice Handbook. The Regional Water Quality Control Board continuously updates impairments as studies are completed, the most current version of impairment data should be reviewed prior to preparation of Preliminary or Final WQMP document.

The MS4 Permit requires that applicable new development and redevelopment projects:

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

4.2.4 Lighting

General Lighting. All projects shall consider proper lighting for safety and security purposes. All lighting fixtures shall be fully shielded with cut-off fixtures so that there is no glare emitted onto adjacent properties or above the lowest part of the fixture. Parking area lighting shall be provided pursuant to Section 19.02.110.A. All outdoor lighting and utilities, including spotlights, floodlights, electrical reflectors, and other means of illumination for signs, structures, landscaping, and similar areas, shall be made of metal, unbreakable plastic, recessed, or otherwise designed to reduce the problems associated with damage and replacement of fixtures. Fixtures shall be vandal proof. Fixtures should be anchored with concrete footing if low voltage lighting is used. Parking areas shall have lighting which provides adequate illumination for safety and security. Parking lot lighting fixtures shall maintain a minimum of 1-foot candlepower across the surface of the parking area. Parking lot lights shall be located such that they do not conflict or displace intended tree planting locations.

a) Have a substantial adverse effect on a scenic vista?

No Impact. Scenic vistas are generally defined as public viewpoints that provide expansive or notable views of a highly valued landscape and are typically identified in planning documents, such as a general plan, but can also include locally known areas or locations where high quality public views are available. The City's General Plan, PVCCSP, and PVCCSP EIR do not identify or otherwise designate scenic vistas or protected viewsheds; however, views of natural landforms are available throughout the City, such as Lake Perris Dam, the Russell Mountains and Bernasconi Hills (all of which are located approximately four miles east of the Project site), and Gavilan Hills and Motte-Rimrock Reserve (located about four and six miles southwest of the Project site, respectively).

Impacts on scenic vistas can result from development directly diminishing the scenic quality of the view or by blocking view corridors. Due to the relatively flat and broad nature of the City's topography, including the Project site and immediately surrounding areas, Section 6.1 of the City's General Plan EIR identified that "virtually all future building construction consistent with land use and development standards… will obstruct views to the foothills from at least some vantage points." The City's General

Plan EIR concludes that the City's east-west and north-south oriented roadways are intended to frame and preserve scenic views towards distant horizons and foothills. Additionally, the PVCCSP EIR Initial Study determined that the PVCCSP was not located within a scenic vista and that development allowed by the PVCCSP would not adversely impact a scenic vista.

The Project site is relatively flat and undeveloped with little topographical change and sparse vegetation. Development at the Project site would include light industrial land uses consisting of a warehouse, future commercial use, and associated parking within the interior portions and landscaping along the edges of the Project site bordering Indian Avenue, Ramona Expressway, and North Perris Boulevard, which are north-south and east-west trending roadways. While development of the Project may obstruct views to the foothills from at least some vantage points, the Project site is located within the boundaries of the PVCCSP and would not adversely impact a scenic vista. Furthermore, the building design would be consistent with land use development standards and the proposed landscaping would contribute to preserving roadway corridors that also support scenic views. Impacts to scenic vistas would not occur and no mitigation would be required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The Project site is undeveloped and vacant and does not contain scenic resources such as trees, rock outcroppings, or historic buildings. Further, while there are three officially designated state scenic highways in Riverside County, including SR-62, SR-74, and SR-243, none of these designated state scenic highways are near the Project site (i.e., the nearest highway is SR 74, approximately eight miles from the Project site; Caltrans 2021). Thus, given that the Project site is not visible from an officially designated state scenic highway and no unique scenic resources exist on-site, there would be no impact to scenic resources within a state scenic highway.

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

Less Than Significant Impact. The existing visual character of the Project site and surrounding area is characterized by urbanizing commercial and industrial land uses that have been implemented according to the PVCCSP, which was developed to transition a formerly agricultural area to a modern-day regional commerce center. Development immediately surrounding the vacant and undeveloped Project site includes a gas station, non-conforming residential uses, commercial retail development, and warehouse buildings, as well as vacant and undeveloped land. The Project site is zoned for commercial uses by the PVCCSP and the proposed Project would involve an amendment to the PVCCSP to allow for light industrial uses consistent with the PVCCSP. Therefore, although the Project site would be converted from a vacant lot to a developed warehouse and industrial site, this conversion is consistent with the existing and planned surrounding land uses as identified in the PVCCSP and would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The Project would also comply with applicable site development criteria contained within the PVCCSP such as height limitations and setbacks. Therefore, the Project would be consistent with the planned site uses and would not conflict with applicable zoning or other regulations governing scenic quality. Impacts associated with the visual character and quality and applicable regulations governing scenic quality would be less than significant and no mitigation would be required.

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

Less Than Significant with Mitigation Incorporated. There are two primary artificial sources of light that generally affect an urban environment: light emanating from building interiors that passes through windows to the outside, and light from exterior sources (e.g., street lighting, parking lot lighting, building illumination, security lighting, and landscape lighting) that affect the natural ambient light level. The introduction of light can be a nuisance by affecting adjacent areas and diminishing the view of the clear night sky depending on the location of the light sources and its proximity to nearby light-sensitive areas. Glare can be caused by unshielded or misdirected lighting sources. Reflective surfaces (i.e., polished metal) can also cause glare. Impacts associated with glare range from a simple nuisance to potentially dangerous situations (i.e., if glare is directed into the eyes of motorists). Glare results from development and associated parking areas that contain reflective materials such as hi-efficiency window glass, highly polished surfaces, and expanses of pavement. The Project site is in a developing area with a mix of commercial and industrial development as well as vacant land that is identified for redevelopment in the PVCCSP. The existing lighting in the Project site include streetlights and vehicle lights along surrounding roadways, as well as from interior and exterior building lighting emanating from the developed commercial and industrial sites.

The Project would include the introduction of new lighting at a vacant site without existing lighting sources. Proposed lighting is anticipated to include a combination of operational, street, and security lighting on the building's exterior and in parking areas that would conform to the California Building Standards Code, Title 24, as well as the City's zoning code standards that regulate outdoor lighting. Specifically, the City's Ordinance No. 1051 requires the use of certain types of light fixtures on non-residential properties in an effort to minimize the amount of light cast on adjoining properties, the public right-of-way, and into the night sky. External lighting may be used during nighttime hours and lighting may be required especially during non-daylight-savings-time months. During any non-operational hours, the buildings would only support security lighting. The proposed Project would also comply with the lighting requirements in the PVCCSP, which contains lighting standards for general, decorative, and parking lot lighting.

The PVCCSP Standards and Guidelines related to colors and materials (Section 4.2.3.5 of the PVCCSP, identified above) encourage the use of low-reflectance facades and prohibits metal siding where visible from the public. Allowed building materials generally include wood, brick, native stone, and tinted/textured concrete. Further, as identified in Section 12.1.3, Compatibility with March ARB/IP ALUCP of the PVCCSP, any use that would cause sunlight to be reflected towards an aircraft engaged in a climb following takeoff or descent towards a landing at an airport is prohibited. Buildings would be constructed of painted concrete tilt-up panels and low-reflective materials, including low-reflective glass. Compliance with the requirements of the PVCCSP related to building materials would ensure that glare does not create a nuisance to on- and off-site viewers of the Project site or aircraft traveling to or from the MARB/IP Airport. Therefore, operational impacts related to glare would be less than significant and no mitigation would be required.

During construction, lights may be used within the construction areas, notably the construction staging areas, to provide security for construction equipment and construction materials. Further, in the event that construction-related activities occur during nighttime hours on the Project site, temporary, overhead artificial lighting would be provided to illuminate the work area. Due to the distance between the construction area and the adjacent residence and motorists on adjacent roadways, such security

lights may result in glare to residents and motorists. However, this potential impact will be reduced to a less than significant level through the City's standard project review and approval process and with implementation of mitigation measure MM Aes 1.

Project Mitigation Measure

MM Aes 1 Prior to issuance of grading permits, the Project developer shall provide evidence to the City of Perris 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.

II. Agriculture and Forestry Resources

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

Applicable PVCCSP Standards and Guidelines

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

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Farmland Mapping and Monitoring Program (FMMP) is a statewide program that designates farmland among several categories, including Prime Farmland, Unique Farmland, and Farmland of Statewide Importance. The FMMP is maintained by the California Department of Conservation (CDC) and is the agency responsible for overseeing farmland classification throughout the state. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. Unique farmland is land, other than Prime Farmland, which has combined conditions to produce sustained high quality and high yields of specialty crops. Farmland of Statewide Importance may include tracts of land that have been designated for agriculture by State law. In some areas that are not identified as having national or statewide importance, land is Farmland of Local Importance.

While the undeveloped Project site would be converted from vacant to industrial and commercial land use, the conversion would not include the loss of active farmland. According to the FMMP online mapping database (CDC 2016), the Project site is classified as Farmland of Local Importance (with portions designated as "Other Land" and does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Furthermore, the Project site is not used for agricultural production. Additionally, the Conservation Element of the City General Plan does not identify the Project site as containing Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Grazing Land (City of Perris 2005). Therefore, no impact would occur in relation to this issue.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Williamson Act, also known as the California Land Conservation Act of 1965, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use; in return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. The Williamson Act is only applicable to parcels within an established agricultural preserve consisting of at least 20 acres of Prime Farmland, or at least 40 acres of land not designated as Prime Farmland. The Williamson Act is designed to prevent the premature and unnecessary conversion of open space lands and agricultural areas to urban uses. As stated above, the Project site is located in an area classified by the CDC as Farmland of Local Importance where no active farmland nor agricultural resources are present. Additionally, the Project site is not within an established agricultural preserve consisting of at least 20 acres of Prime Farmland or at least 40 acres of land not designated as Prime Farmland. Further, the Conservation Element of the General Plan does not map Williamson Act land within the Project site (City of Perris 2005). Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract and no impact would occur.

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

No Impact. Public Resources Code Section 12220(g) defines "forest land" as land that can support 10 percent native cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife,

biodiversity, water quality, recreation, and other public benefits. Based on this definition, no forest land occurs within or adjacent to the Project site. Moreover, there is no land zoned as forest land or timberland that exists within the Project site or within its vicinity. There are scattered trees throughout the area; however, there are no concentration of trees within the site that would constitute a forest. Therefore, the proposed Project would not conflict with existing zoning for forest land or timberland. No impact to forest land would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As stated in under question c), above, there is no concentration of trees on the site that would constitute a forest. The site has not been historically and is not currently used or planned to be used for forest land. As such, implementation of the proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur in relation to this issue.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As stated under questions a) through d), above, the Project site is located in an area classified as Farmland of Local Importance, but no agricultural resources are present on the Project site or immediate vicinity. Land to the west of the Project site is similarly vacant and disturbed. To the north are three non-conforming residences, and two undeveloped parking lots. Several businesses, including a used car dealership, bitcoin ATM, and ARCO gas station line the lot bordering Perris Boulevard to the east The majority of the surrounding area is classified as urban and built-up land. Additionally, there is no concentration of trees that would constitute a forest. The proposed Project would result in the conversion of the undeveloped Project site to developed use, but the Project site is not categorized as Prime Farmland, Unique Farmland or Farmland of Statewide Importance nor is the site designated as forest land. Therefore, implementation of the Project would not result in the conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use. No impact would occur in relation to this issue.

III. Air Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	■	☐

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	■	☐
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	■	☐

An Air Quality and Greenhouse Gas Emissions Technical Report (HELIX 2022a; attached to this IS/MND as Appendix A), and a Warehouse Operations Health Risk Assessment (HRA) (HELIX 2022b; attached to this IS/MND as Appendix B) was prepared for the proposed Project. The findings and recommendations contained in those reports are incorporated into the following analysis.

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to the analysis of air quality impacts. These Standards and Guidelines summarized below are incorporated as part of the proposed Project and are assumed in the analysis presented in this section. The chapters/section numbers provided correspond to the PVCCSP chapters/sections.

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

8.2.1.4 Employee Break Areas and Amenities

Buildings exceeding 100,000 sf shall require employee amenities such as, but not limited to, cafeterias, exercise rooms, locker rooms and shower, walking trails and recreational facilities. Inclusion of theses amenities in the project would encourage employee trip reduction, reducing associated transportation pollutant emissions.

The Air Quality and Greenhouse Gas Emissions Technical Report and HRA were prepared for the Project in compliance with the following PVCCSP EIR mitigation measures:

MM Air 1 To identify potential implementing development project-specific impacts resulting from construction activities, proposed development projects that are subject to CEQA shall have construction related air quality impacts analyzed using the latest available URBEMIS model, or other analytical method determined in conjunction with the SCAQMD. The results of the construction-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Threshold analysis or other appropriate analyses as determined in conjunction with SCAQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.

MM Air 10 To identify potential implementing development project-specific impacts resulting from operational activities, proposed development projects that are subject to CEQA shall have long-term operational-related air quality impacts analyzed using the latest

URBEMIS model, or other analytical method determined by the City of Perris as lead agency in conjunction with the SCAQMD. The results of the operational-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Threshold analysis, CO Hot Spot analysis, or other appropriate analyses as determined by the City of Perris in conjunction with SCAQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.

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

The following mitigation measures from the PVCCSP EIR are applied to the proposed Project:

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

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

- requiring the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain),
- keeping disturbed/ loose soil moist at all times,
- requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered,

- installation of wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip,
- posting and enforcement of traffic speed limits of 15 miles per hour or less on all unpaved potions of the project site,
- suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 miles per hour,
- appointment of a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM-10 generation,
- sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks when sweeping streets to remove visible soil materials,
- replacement of ground cover in disturbed areas as quickly as possible.

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

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

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

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

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

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

MM Air 11 Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of 5 minutes.

MM Air 13 In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest of each implementing development project shall provide building occupants 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.

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

MM Air 17 New sensitive land uses such as residential, a hospital, medical offices, day care facilities, and fire stations shall not be located closer than 1,000 feet from any existing or proposed distribution center/warehouse facility which generates a minimum of 100 truck trips per day, or 40 truck trips with TRUs per day, or TRU operations exceeding 300 hours per week, pursuant to the recommendations set forth in the CARB Air Quality and Land Use Handbook. If new sensitive land uses cannot meet this setback, they will be designed and conditioned to include mechanical ventilation systems with fresh air filtration. For operable windows or other sources of ambient air filtration, installation of a central HVAC (heating, ventilation, and air conditioning) system that includes high efficiency filters for particulates (MERV-13 or higher) or other similarly effective systems shall be required.

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

curb and gutter at bus stops and the use of ADA-compliant paths to the major building entrances in the project.

MM Air 20 Each implementing development project shall implement, at a minimum, an increase in each building's energy efficiency 15 percent beyond Title 24, and reduce indoor water use by 25 percent. All requirements 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.

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The Project site is located within the South Coast Air Basin (SCAB), which consists of all or part of Los Angeles, San Bernardino, Riverside, and Orange Counties. Air quality in the SCAB is regulated by the SCAQMD. As a regional agency, the SCAQMD works directly with SCAG, County transportation commissions, and local governments, as well as cooperates actively with all federal and state government agencies. The SCAQMD develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary.

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a sequence of Air Quality Management Plans (AQMPs). An AQMP establishes a program of rules and regulations directed at attaining the National Ambient Air Quality Standards and California Ambient Air Quality Standards. The regional plan applicable to the proposed Project is the SCAQMD's AQMP.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, economy, community development, and environment. Regarding air quality planning, SCAG has prepared the Connect SoCal RTP/SCS, a long-range transportation plan that uses growth forecasts to project trends over a 20-year period to identify regional transportation strategies to address mobility needs. These growth forecasts form the basis for the land use and transportation control portions of the AQMP. These documents are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. Both the RTP/SCS and AQMP are based, in part, on growth projections originating with County and City General Plans and Specific Plans.

Projects that are consistent with the land use designation for their project site are generally consistent with the population and growth assumptions used in the AQMP. The proposed Project does not have a residential component and would not result in regional population growth. The PVCCSP designates the Project site as a Commercial land use. The Project proposes an amendment to the PVCCSP to replace the existing Commercial land use designation with a Light Industrial land use for approximately 13.3 acres of the Project site. Land use designations for the remaining approximately 1.6 acres in the northeastern of the Project site would not be modified as part of the Project and would continue to be designated Commercial. According to data presented in the SCAG's Employment Density Summary Report, average employment densities for commercial uses in the region range from a high of 175.49 employees per acre (high-rise office) to a low of 19.71 employees per acre (regional retail). Average employment densities for light industrial uses are 17.83 employees per acre for light manufacturing and 11.4 employees per acre for warehouse (SCAG 2001). Therefore, changing the land use designation from Commercial to Light Industrial for the warehouse portion of the Project would not result in employment

growth exceeding the assumptions used to develop the AQMP. As such, employment growth in the City as a result of the Project, and the related changes in regional emissions, are accounted for in the AQMP, which is crafted to bring the basin into attainment for all criteria pollutants. Therefore, the proposed Project would not conflict with or obstruct implementation of the AQMP. Impacts would be less than significant and no mitigation would be required.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. By its very nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development within the SCAB. The region is a federal and/or state nonattainment area for ozone, PM10 and PM2.5. In accordance with State CEQA Guidelines Section 15064(h)(3), the SCAQMD's approach for assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. If a project is not consistent with the AQMP, which is intended to bring the SCAB into attainment for all criteria pollutants, that project can be considered cumulatively considerable. Additionally, if the mass regional emissions calculated for a project exceed the applicable SCAQMD daily significance thresholds that are designed to assist the region in attaining the applicable state and national ambient air quality standards, that project can be considered cumulatively considerable. The SCAQMD thresholds of significance for construction and operational air emissions are shown in Table 4.

Table 4
SCAQMD CRITERIA AIR POLLUTANT EMISSIONS THRESHOLDS

Criteria Pollutant	Emission Thresholds (pounds per day) Construction	Emission Thresholds (pounds per day) Operation
Volatile Organic Compounds (VOC)	75	55
Oxides of Nitrogen (NO_X)	100	55
Carbon Monoxide (CO)	550	550
Particulate Matter (PM_{10})	150	150
Particulate Matter ($PM_{2.5}$)	55	55
Oxides of Sulfur (SO_X)	150	150
Lead	3	3

Source: SCAQMD 2019

As discussed under question a) above, the Project would not conflict with or obstruct implementation of the AQMP. A comparison of the Project mass regional emissions with the applicable SCAQMD daily significance thresholds is provided below.

The Project would generate criteria pollutants and precursors in the short-term during construction and the long-term during operation. The Project's mass regional emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2020.4.0. Additional details of modeling methodology, assumptions, and model output data is provided in the Air Quality and Greenhouse Gas Emissions Technical Report (HELIX 2022a; Appendix A).

Construction Emissions

Construction emissions were estimated based on the timeline provided by the Project applicant, which assumes construction of Phase 1 would commence with site preparation in October 2022. Modeling considered construction of the warehouse to be Phase 1 and construction of the hotel to be Phase 2. Construction of Line E is anticipated to start concurrent with Phase 1 grading and finish concurrent with the first two months of warehouse building construction. Line E construction is included in the underground utilities activity. Architectural coatings (e.g., painting) for the hotel are assumed to occur concurrent with the last two months of building construction. The results of the calculations for Project construction are shown in Table 5. The data are presented as the maximum anticipated daily emissions for comparison with the SCAQMD thresholds.

Table 5
MAXIMUM DAILY CONSTRUCTION EMISSIONS

Activity	ROG (lbs/day)	NO_X (lbs/day)	CO (lbs/day)	SO_X (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
Phase 1 Site Preparation	3.8	37.2	23.7	<0.1	10.8	6.2
Phase 1 Grading	4.0	51.6	32.4	0.1	7.8	3.8
Phase 1 Underground Utilities/Line E	1.2	10.1	9.3	<0.1	0.5	0.4
Phase 1 Building Construction	3.1	23.7	27.6	<0.1	3.8	1.7
Phase 1 Paving	1.9	20.0	15.9	<0.1	1.2	0.7
Phase 1 Architectural Coatings	55.6	1.3	2.9	<0.1	0.5	0.2
Phase 1 Concurrent Grading Underground Utilities	5.2	61.7	41.8	<0.1	8.4	4.2
Phase 1 Concurrent Underground Utilities and Building Construction	4.3	33.8	36.9	<0.1	4.4	2.1
Phase 1 Maximum Daily Emissions	**55.6**	**61.7**	**41.8**	**0.1**	**10.8**	**6.2**
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Phase 1 Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***
Phase 2 Site Preparation	1.4	1.5	8.35	<0.1	3.5	1.9
Phase 2 Grading	1.6	15.5	10.7	<0.1	4.0	2.2
Phase 2 Building Construction	2.0	13.2	16.7	<0.1	1.6	0.8
Phase 2 Architectural Coatings	20.9	1.2	2.2	<0.1	0.2	0.1
Phase 2 Paving	0.8	6.3	9.4	<0.1	0.6	0.3
Phase 2 Concurrent Building Construction and Architectural Coating	22.8	14.4	19.0	<0.1	1.9	0.9
Phase 2 Maximum Daily Emissions	**22.8**	**14.4**	**19.0**	**<0.1**	**4.0**	**2.2**
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Phase 2 Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

Source: CalEEMod; Appendix A
lbs/day = pounds per day; ROG = reactive organic gas; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Table 5, construction period emissions of criteria pollutants and precursors would not exceed the SCAQMD significance thresholds.

Operational Emissions

Operational sources of emissions include area, energy, mobile (transportation), water use, and solid waste. Per the Project applicant, all warehouse space was modeled in CalEEMod with a land use of Unrefrigerated Warehouse – No Railroad. Table 6 presents the summary of operational and construction emissions that would occur when Phase 1 (warehouse) is operational and Phase 2 (hotel) is still under construction. The data are presented as the maximum anticipated daily emissions for comparison with the SCAQMD thresholds.

Table 6
MAXIMUM DAILY OPERATIONAL EMISSIONS

Category	ROG (lbs/day)	NO_X (lbs/day)	CO (lbs/day)	SO_X (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
Phase 1 Area	5.0	<0.1	<0.1	<0.1	<0.1	<0.1
Phase 1 Energy	0.1	0.1	0.1	<0.1	<0.1	<0.1
Phase 1 Mobile	1.0	22.6	11.0	0.1	7.2	2.2
Phase 1 Total[1]	**6.1**	**22.7**	**11.2**	**0.1**	**7.2**	**2.2**
Phase 2 Construction	22.8	14.4	19.0	<0.1	4.0	2.2
Total Maximum Daily Emissions[1]	**28.6**	**36.5**	**29.9**	**0.1**	**11.2**	**4.4**
SCAQMD Thresholds	*55*	*55*	*550*	*150*	*150*	*55*
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

Source: CalEEMod; Appendix A
[1] Totals may not sum due to rounding.
lbs/day = pounds per day; ROG = reactive organic gas; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Table 6, Project emissions during operation of the warehouse and construction of a hotel would not exceed the daily thresholds set by the SCAQMD. Table 7 shows the combined operational emissions of the warehouse and hotel use.

Table 7
PHASE 1 AND PHASE 2 OPERATIONAL DAILY EMISSIONS

Category	ROG (lbs/day)	NO_X (lbs/day)	CO (lbs/day)	SO_X (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
Phase 1 Area	5.0	<0.1	<0.1	<0.1	<0.1	<0.1
Phase 1 Energy	<0.1	0.1	0.1	<0.1	<0.1	<0.1
Phase 1 Mobile	1.0	22.5	11.0	0.1	7.2	2.2
Phase 1 Total[1]	**6.1**	**22.7**	**11.2**	**0.1**	**7.2**	**2.2**
Phase 2 Area	4.1	<0.1	<0.1	<0.1	<0.1	<0.1
Phase 2 Energy	0.3	2.9	2.4	<0.1	0.2	0.2
Phase 2 Mobile	2.1	2.9	18.8	<0.1	5.1	1.4
Phase 2 Total[1]	**6.5**	**5.8**	**21.2**	**<0.1**	**5.3**	**1.6**
Total Maximum Daily Emissions[1]	**12.6**	**28.5**	**32.4**	**0.1**	**12.5**	**3.8**
SCAQMD Thresholds	*55*	*55*	*550*	*150*	*150*	*55*
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

Source: CalEEMod; Appendix A
[1] Totals may not sum due to rounding.
lbs/day = pounds per day; ROG = reactive organic gas; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Table 7, the combined operational emissions of Phase 1 and Phase 2 would not exceed the daily thresholds set by the SCAQMD.

Impact Conclusion

Short-term construction and long-term operation of the Project would not result in criteria pollutant and precursor pollutant emissions that would exceed the SCAQMD significance thresholds. Although Project emissions would not exceed the SCAQMD thresholds, the Project would be required to implement mitigation measures MM Air 2, MM Air 3, MM Air 4, MM Air 5, MM Air 6, MM Air 7, MM Air 8, MM Air 9, MM Air 11, MM Air 13, MM Air 14, MM Air 18, and MM Air 20 from the PVCCSP EIR (see Section 5.2.1). In accordance with PVCCSP EIR mitigation measure MM Air 18, the Project applicant contacted the RTA to determine if the RTA has plans for the future provision of bus routing within any street that is adjacent to the Project that would require bus stops at the Project access points. The RTA was contacted regarding this Project on May 18, 2022 and informed the applicant on May 19, 2022 that the RTA has no plans for bus stops adjacent to the Project site given the existing stops nearby. No adjustments to the Project would be necessary to accommodate existing or future RTA bus stops. Therefore, the Project has already complied with MM Air 18. No further Project-specific mitigation measures would be required.

The Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the SCAB is non-attainment, and the impact would be less than significant and no mitigation would be required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. CARB and the Office of Environmental Health Assessment (OEHHA) have identified the following groups of individuals as the mostly likely to be affected by air pollution: adults over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The closest existing sensitive receptor locations to the Project site are located at three single-family residences on parcels abutting the Project site to the north. Even though these parcels are not zoned for residential uses, they are still considered locations where sensitive receptors may be located for extended periods. To be conservative (health protective) in this analysis, this location is considered a residential site. Additional residential sensitive receptors are located southeast of the Project site, across Ramona Expressway and North Perris Boulevard, behind a row of commercial buildings.

For a Type A project (siting a new source of emissions), the SCAQMD recommends the following thresholds for the Project's incremental contribution to community health risks:

Cancer Risk – An increased risk of 10 in 1 million for the maximally exposed individual to project emissions.

Cancer Burden – 0.5 excess cancer cases in areas exposed to 1 in 1 million or greater cancer risk from project emissions.

Chronic Health Risk – A Hazard Index of 1 for the maximally exposed individual to project emissions.

Construction Activities

Criteria Pollutants

The localized effects from the on-site portion of daily construction emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's localized significance threshold (LST) method. The proposed Project is within SRA 24, Moreno Valley. Consistent with the LST guidelines, when quantifying mass emissions for localized analysis, only emissions that occur on site are considered. Emissions related to off-site delivery/haul truck activity and construction worker trips are not considered in the evaluation of construction-related localized impacts, as these do not contribute to emissions generated on a project site. The closest sensitive receptor is the single-family residence adjacent to the northwest corner of the Project site. Therefore, the LSTs in SRA 24 for receptors located less than 82 feet (25 meters) are used for project sites greater than five acres. Table 8 shows the localized daily construction emissions.

Table 8
MAXIMUM LOCALIZED DAILY CONSTRUCTION EMISSIONS

Activity	NO_X (lbs/day)	CO (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
Phase 1 Site Preparation	37.1	23.1	10.6	6.2
Phase 1 Grading	38.8	29.0	5.8	3.2
Phase 1 Underground Utilities/Line E	10.1	8.9	0.4	0.4
Phase 1 Building Construction	19.6	19.7	1.0	0.9
Phase 1 Paving	9.5	14.6	0.5	0.4
Phase 1 Architectural Coatings	1.2	1.8	0.1	0.1
Phase 1 Concurrent Grading and Underground Utilities	48.9	37.9	6.2	3.5
Phase 1 Concurrent Underground Utilities and Building Construction	26.7	28.6	1.3	1.3
Phase 2 Site Preparation	13.5	8.3	3.4	1.9
Phase 2 Grading	15.5	10.3	3.8	2.1
Phase 2 Building Construction	12.7	14.1	0.4	0.4
Phase 2 Architectural Coatings	1.1	1.8	0.1	0.1
Phase 2 Paving	5.3	8.8	0.2	0.2
Phase 2 Concurrent Building Construction and Architectural Coating	13.0	15.8	0.5	0.5
Maximum Daily Emissions	**48.9**	**37.9**	**10.6**	**6.2**
SCAQMD LST Thresholds (25 meters)	*270*	*1,577*	*13*	*8*
Exceed LST (25 meters)?	***No***	***No***	***No***	***No***

Source: CalEEMod; Appendix A
lbs/day = pounds per day; NO_X = nitrogen oxides; CO = carbon monoxide; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Table 8, localized emissions for all criteria pollutants would remain below their respective SCAQMD LSTs at 82 feet (25 meters). Therefore, construction of the Project would not result in exposure of sensitive receptors to substantial localized concentrations of criteria pollutants and precursors.

Construction Toxic Air Contaminants

Implementation of the Project would result in the use of heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles. These vehicles and equipment could generate the Toxic Air Contaminant (TAC) diesel particulate matter (DPM). Generation of DPM from construction projects typically occurs in a localized area (e.g., at the Project site) for a short period of time. Because construction activities and subsequent emissions vary depending on the phase of construction (e.g., grading, building construction), the construction-related emissions to which nearby receptors are exposed to would also vary throughout the construction period. During some equipment-intensive phases such as grading, construction-related emissions would be higher than other less equipment-intensive phases such as building construction. Concentrations of mobile-source DPM emissions are typically reduced by 70 percent at approximately 500 feet (CARB 2005).

The dose (of TAC) to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has with the substance; a longer exposure period to a fixed quantity of emissions would result in higher health risks. Current models and methodologies for conducting cancer health risk assessments are associated with longer-term exposure periods (typically 30 years for individual residents based on guidance from OEHHA) and are best suited for evaluation of long duration TAC emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of construction activities. Cancer potency factors are based on animal lifetime studies or worker studies where there is consistent long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime (OEHHA 2015). Considering this information, the highly dispersive nature of DPM, and the fact that construction activities would occur at various locations and varying intensities throughout the Project site, it is not anticipated that construction of the Project would expose sensitive receptors to substantial DPM concentrations.

Operational Activities

Criteria Pollutants

SCAQMD's LST methodology can be used by public agencies to determine whether a project may generate significant adverse localized air quality impacts from on-site emissions of NO_X, CO, PM_{10} and $PM_{2.5}$. For Project operational activities, emissions of NO_X and CO are associated with truck and passenger vehicle emissions which primarily occur off-site. The portion of truck and passenger vehicle emissions which occur on-site are limited to low-speed circulation and idling and would be a small portion of the Project operational emissions of 28 pounds per day of NO_X and 32 pounds per day of CO, far below the applicable LST thresholds of 270 pounds per day NO_X and 1,577 pounds per day CO. Operational PM_{10} and $PM_{2.5}$ emissions from area sources (primarily landscape equipment exhaust) and energy sources (natural gas combustion exhaust) would be negligible—less than 0.01 pound per day. The only remaining on-site operational source of PM emissions would be low-speed circulation and idling exhaust emissions from trucks. The total exhaust PM emissions produced on or near the project site by project-related truck trips would be approximately 0.54 pound per year (0.001 pound per day) of PM_{10} and $PM_{2.5}$. Total PM_{10} or $PM_{2.5}$ produced on the project site would be less than 0.01 pound per day, far below the LST threshold of 4 pounds per day for PM_{10} and 2 pounds per day for $PM_{2.5}$. Therefore, operation of the Project would not result in exposure of sensitive receptors to substantial localized concentrations of NO_X or CO. Impacts related to exposure of sensitive receptors to Project operational emissions of PM (primarily DPM) are discussed and evaluated below.

Carbon Monoxide Hotspots

Vehicle exhaust is the primary source of carbon monoxide (CO). In an urban setting, the highest CO concentrations are generally found within close proximity to congested intersections. Under typical meteorological conditions, CO concentrations tend to decrease as distance from the emissions source (i.e., congested intersection) increase. Project-generated traffic has the potential of contributing to localized "hot spots" of CO off-site. Because CO is a byproduct of incomplete combustion, exhaust emissions are worse when fossil-fueled vehicles are operated inefficiently, such as in stop-and-go traffic or through heavily congested intersections, where the level of service (LOS) is severely degraded.

CARB recommends evaluation of the potential for the formation of locally high concentrations of CO, known as CO hot spots. A CO hot spot is a localized concentration of CO that is above the state or national 1-hour or 8-hour CO ambient air standards. To verify that the Project would not cause or contribute to a violation of the 1-hour and 8-hour CO standards, an evaluation of the potential for CO hot spots at nearby intersections was conducted. In accordance with the Transportation Project-Level Carbon Monoxide Protocol, CO hot spots are typically evaluated when: (a) the LOS of an intersection decreases to a LOS E or worse because of the Project; (b) signalization and/or channelization is added to an intersection; and (c) sensitive receptors such as residences, schools, hospitals, etc., are located in the vicinity of the affected intersection or roadway segment (California Department of Transportation [Caltrans] 1998).

According to the intersection analysis contained in the Traffic Analysis, no Project-affected intersection would operate at LOS E or worse under existing or existing plus Project conditions. Under cumulative conditions (2022) the intersections of Ramona Expressway/Indian Avenue and Ramona Expressway/ Perris Boulevard would operate at LOS F during the afternoon peak hour. The addition of Project traffic would increase intersection delays by up to 5 seconds but would not change the LOS (Urban Crossroads 2022). There are no sensitive receptors located in proximity to either intersection. The closest sensitive receptors would be the mobile home park, located approximately 420 feet southwest of the Ramona Expressway/Perris Boulevard intersection. Therefore, implementation of the Project would not expose sensitive receptors to substantial localized concentrations of CO.

Operational DPM Emissions

Implementation of the Project would result in emissions of DPM from operation of a warehouse facility. The HRA prepared for the Project evaluated potential impacts to sensitive receptors from the operational DPM emissions (HELIX 2022b; Appendix B).

Long-term operation of the Project would result in emissions of DPM from diesel-powered trucks traveling to and from the Project site, circulating on the Project site, and parked while idling at the Project site. Truck DPM emissions were calculated using truck emissions and vehicle miles traveled (VMT) data from CARB's EMFAC2021 version 1.0.01 online database. All trucks were assumed to idle at the loading docks for the maximum allowable 5 minutes (per California Code of Regulations [CCR] Title 13, Section 2485). In addition, 25 percent of trucks were assumed to stage in the truck/trailer parking area before or after unloading/loading and idle for an additional 5 minutes. Truck idling emissions were assumed to be approximately equivalent to truck emissions at 5 mph reported in the EMFAC2021 database.

Localized concentrations of DPM were modeled using Lakes AERMOD View version 10.2.0. The Lakes program utilizes the U.S. Environmental Protection Agency's (USEPA) AERMOD gaussian air dispersion

model version 19191. Plot files from AERMOD using unitized emissions (one gram per second) for each DPM source were imported into CARB's Hotspots Analysis and Reporting Program (HARP), Air Dispersion Modeling and Risk Tool (ADMRT) version 21081. The ADMRT calculated ground-level concentrations of DPM utilizing the imported plot files and the calculated annual and hourly emissions.

Health risks resulting from localized concentration of DPM were estimated using the ADMRT. The latest cancer slope factors and chronic Reference Exposure Limits (RELs), and exposure paths for all TACs designated by CARB are included in ADMRT. For the residential cancer risk, an exposure duration of 30 years was selected in accordance with the OEHHA (2015) guidelines. The model conservatively assumes that residents would be standing and breathing outdoors at the location of the property line closest to the gas station every day between 17 and 21 hours per day (depending on the age group, starting with infants in utero in the third trimester of pregnancy) for 30 years. The Risk Management Policy using the derived method for the intake rate percentile was selected in accordance with the SCAQMD guide recommendations. For off-site worker cancer risk, an exposure duration of 25 years was selected with an assumption of 8 hours per day, 5 days per week of exposure while standing outside with moderate intensity breathing rates, in accordance with the OEHHA guidelines. Because DPM only has an inhalation cancer slope factor and an inhalation chronic REL, only the cancer risk and chronic risk from exposure to DPM was evaluated, and only the inhalations pathway was evaluated.

The incremental excess cancer risk is an estimate of the chance a person exposed to a specific source of a TAC may have of developing cancer from that exposure beyond the individual's risk of developing cancer from existing background levels of TACs in the ambient air. For context, the average cancer risk from TACs in the ambient air for an individual living in an urban area of California is 830 in 1 million. Cancer risk estimates do not mean, and should not be interpreted to mean, that a person will develop cancer from estimated exposures to toxic air pollutants.

The maximum estimated community incremental excess cancer risks due to exposure to the Proposed Project TAC emissions from long term operation of the warehouse facility are presented in Table 9 (*Maximum Incremental Cancer Health Risk*). These estimates are conservative (health protective) and assume that the student, resident, or worker is outdoors for the entire exposure period.

Table 9
MAXIMUM INCREMENTAL CANCER HEALTH RISK

	Maximally Exposed Individual Resident Cancer Risk (per million)	Maximally Exposed Individual Worker Cancer Risk (per million)
Results	1.1	<0.1
Threshold	10	10
Exceed Threshold?	No	No

Source: Lakes AERMOD View and CARB ADMRT; Appendix B.

As shown in Table 9, the Project's incremental increased cancer risk would not exceed the SCAQMD's threshold of 10 in 1 million. The chronic health risk hazard index for all receptors would be less than 0.01 and would not exceed the SCAQMD's threshold of 1.

Cancer burden evaluates an overall population's increased cancer risk and is defined as the increases in cancer cases in the population due exposure to TACs from a project. Cancer burden is calculated differently from individual risk. Per OEHHA, cancer burden uses a 70-year exposure to evaluate

population-wide cancer risk, and the cancer burden only evaluates residential exposure (not worksites). Cancer burden is calculated by multiplying the number of residents exposed to an incremental excess cancer risk of 1 in 1 million or greater by the estimated incremental excess cancer risk of the maximum exposed individual resident. Only the residence adjacent to the northwest corner of the Project site would be within or touching the 1 in 1 million isopleth (geographic lines of equal risk). Assuming up to 10 residents per residence, the cancer burden resulting from long-term operation of the Project would be 0.00001, below the SCAQMD threshold of 0.5.

Impact Conclusion

Construction of the Project would not result in significant localized concentrations of criteria pollutants or TACs. Long-term operation of the Project would not result in significant localized concentrations of CO. Long-term operation of the Project would result in cancer risk, chronic health risk, and cancer burden below the respective SCAQMD thresholds. Although Project emissions would not exceed the SCAQMD thresholds for community health risks, or result in substantial localized pollutant concentrations, the proposed Project would be required to implement mitigation measures MM Air 11 and MM Air 13 from the PVCCSP EIR. The requirements of mitigation measure MM Air 15 from the PVCCSP EIR are satisfied by the Project specific HRA completed and included as Appendix B to this Initial Study. Mitigation measure~~s~~ MM Air 16 would not apply to the Project since it is not located within 500 feet of I-215.~~and~~ PVCCSP mitigation measure MM Air 17 concerns the siting of new sensitive receptors and would apply only to the hotel portion of the Project ~~would not apply to the Project~~. No additional Project specific mitigation measures would be required to reduce the severity of impacts related to the exposure of sensitive receptors to substantial pollutant concentrations.

Implementation of the Project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant and no additional mitigation would be required.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations. The proposed Project, involving a warehouse facility development, would not include any of these uses nor are there any of these land uses in the Project vicinity.

Emissions from construction equipment, such as diesel exhaust, and VOCs from architectural coatings and paving activities may generate odors; however, these odors would be temporary, intermittent, and not expected to affect a substantial number of people. Additionally, noxious odors would be confined to the immediate vicinity of construction equipment. Furthermore, short term construction-related odors are expected to cease upon the drying or hardening of the odor-producing materials. Long-term operation of the Project would not be a substantial source of objectionable odors. The Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, the Project would not create objectionable odors affecting a substantial number of people, the impact would be less than significant and no mitigation would be required.

IV. Biological Resources

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

A General Biological Resource Assessment and Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis prepared by HELIX (GBRA-MSHCP; HELIX 2022c), which is attached to this IS/MND as Appendix C, was prepared for the proposed Project. The report provides a general evaluation of biological resources potentially affected by the proposed Project and analyzes the potential impacts of the Project pursuant to the requirement of the adopted Western Riverside Multiple Species Habitat Conservation Plan (MSHCP; Dudek and Associates [Dudek] 2003). Its findings and recommendations are incorporated into the following analysis.

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

There are no PVCCSP Standards and Guidelines applicable to the analysis of biological resources for the proposed Project. The ~~GBRA-MSHCP prepared for the Project implements the following applicable~~ PVCCSP EIR mitigation measures~~:~~ MM Bio 1, MM Bio 2, MM Bio 3, MM Bio 4, and MM Bio 5 have been

updated in coordination with the CDFW and are replaced by Project Mitigation Measures MM Biol 1 through MM Biol 4.

~~**MM Bio 3** Project-specific delineations will be required to determine the limits of ACOE, RWQCB, and CDFG jurisdiction for implementing projects that may contain jurisdictional features. Impacts to jurisdictional waters will require authorization by the corresponding regulatory agency. If impacts are indicated in an implementing project-specific delineation, prior to the issuance of a grading permit, such implementing projects will obtain the necessary authorizations from the regulatory agencies for proposed impacts to jurisdictional waters. Authorizations may include, but are not limited to, a Section 404 permit from the ACOE, a Section 401 Water Quality Certification from the RWQCB, and a Section 1602 Streambed Alteration Agreement from CDFG.~~

~~**MM Bio 4** Project-specific mapping of riparian and unvegetated riverine features will be required for implementing projects pursuant to Section 6.1.2 of the MSHCP. For areas not excluded as artificially created, the MSHCP requires 100 percent avoidance of riparian/riverine areas. If for any implementing project avoidance is not feasible, then such implementing projects will require the approval of a DBESP including appropriate mitigation to offset the loss of functions and values as they pertain to the MSHCP covered species. Riparian vegetation will also need to be evaluated for the least Bell's vireo, southwestern willow flycatcher, and western yellow-billed cuckoo.~~

~~**MM Bio 5** Project-specific mapping of vernal pools for implementing projects will be required pursuant to Section 6.1.2 of the MSHCP. For areas not excluded as artificially created, the MSHCP requires 100 percent avoidance of vernal pools. If for any implementing project avoidance is not feasible, then such implementing projects will require the approval of a DBESP including appropriate mitigation to offset the loss of functions and values as they pertain to the MSHCP and covered species. Vernal pools and other seasonal ponding depressions will also need to be evaluated for listed fairy shrimp.~~

~~The PVCCSP EIR mitigation measures that are applicable to the proposed Project are as follows:~~

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

~~If site preparation activities for an implementing project are proposed during the nesting/breeding season (February 1 to August 31), a pre-activity field survey shall be conducted by a qualified biologist prior to the issuance of grading permits for such project, to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not located within the implementing project site and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, construction may be conducted during the nesting/breeding season. However, if active nests are located~~

~~during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.~~

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

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

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

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant with Mitigation Incorporated. HELIX conducted biological surveys in March, October, and December 2020, and January, February, March, and April 2021. Based on HELIX's observations of the Project site, the site consists of disturbed, formerly disked land and documented an open brow ditch that connects to the Perris Valley Storm Drain at the southern edge of the property.

Wildlife

According to the biological evaluation conducted for the Project (HELIX 2022c; Appendix C), special status wildlife species with the potential to occur include vernal pool fairy shrimp; BUOW; California horned lark (*Eremophila alpestris actia*); western spadefoot (*Spea hammondii*).

Surveys for fairy shrimp were conducted in the vernal pools on the Project site on December 30, 2020, January 12, 19, and 25, February 3, 6, 9, 16 and 23, March 2, 9, 16, 23 and 30, and April 6, 2021. While fairy shrimp were observed in the vernal pools, no sensitive species of fairy shrimp were observed. Sensitive species of fairy shrimp are presumed absent from the site and no additional surveys or mitigation are required.

The Project site is located within a MSHCP Survey Area for burrowing owls. A focused burrow survey was conducted by HELIX biologists, and suitable habitat was discovered during the first survey on February 2, 2021. As a result, additional surveys were conducted on March 9, 22, 31, and April 6, 2021, by biologist Robert Hogenauer, in accordance with survey guidelines described in the 2006 MSHCP Burrowing Owl Survey Instructions. No burrowing owls or signs of burrowing owls were found on the Project site during the focused survey efforts; however, because the Project site and surrounding areas provide potentially suitable habitat burrowing owls could occur on the site. Construction activities have the potential to directly harm individual owls, if present, and could negatively impact nesting activities if the site is used for nesting. Mitigation measure MM Bio 2 from the PVCCSP EIR (as updated in Project Mitigation Measure Biol 2 per CDFW direction) requires that a burrowing owl pre-construction survey be conducted prior to initiation of construction activities to avoid negatively impacting individuals and/or their nests. Furthermore, if burrowing owls colonize the Project site prior to the initiation of construction, the Project Applicant would immediately inform the ~~Regional Conservation Authority (RCA)~~City and within three days of detection of burrowing owls, the City would inform the Wildlife Agencies~~ and would need to prepare~~. Additionally, a *Burrowing Owl Protection and Relocation Plan* would need to be prepared for approval by RCA and the Wildlife Agencies prior to initiating ground disturbance.

In accordance with Objective 5 of the MSHCP for burrowing owl, if the Project site (including adjacent areas) supports three or more pairs of burrowing owl, is greater than 35 acres of suitable habitat, and is non-contiguous with MSHCP conservation land, at least 90 percent of the area with long-term conservation value will be conserved on-site. Based on the small size of the study area and surrounding development and land uses, the study area does not represent land with a long-term conservation value for burrowing owl.

One special-status animal species, the California horned lark, was observed foraging on-site. Potential impacts to this species are covered via compliance with the MSHCP. Payment of the Local Development Mitigation Fee (LDMF) and compliance with the ~~MSCHP~~MSHCP would satisfy mitigation requirements

associated with potential impacts to this species. No Project-specific mitigation for California horned lark is required. Refer to the discussion in question d), below for more discussion regarding the LDMF.

The western spadefoot is a species with low potential to occur. Although pools on-site represent potential habitat for western spadefoot, no species were observed during focused surveys of the pools on the Project site. Western spadefoot is considered to be absent from the site and no additional surveys or mitigation are required.

The Project site provides potential nesting habitat for a variety of birds and raptors. Vegetation removal during the nesting season has the potential to impact nesting birds, if present. Nesting birds are protected under the Migratory Bird Treaty Act (MBTA) and under the ~~CDFW~~California Fish and Game code and impacts to nesting birds would be potentially significant. Project Mitigation ~~measure~~Measure MM ~~Bio~~Biol 1 ~~from the~~(replacing PVCCSP EIR Mitigation Measure MM Bio 1 per CDFW direction) would be implemented to reduce potentially significant impacts to a level of less than significant.

Plants

According to the biological evaluation conducted for the Project (HELIX 2022c; Appendix C), 23 MSHCP plant species have the potential to occur in the aquatic habitats on the Project site (refer to the GBRA-MSHCP in Appendix C for the list of species); three State and/or federally-listed sensitive plant species not included in the MSHCP were identified as having a low potential to occur. They are the federal threatened and state endangered thread-laved brodiaea (*Brodiaea filifolia*), federal endangered San Jacinto valley crownscale (*Atriplex var. notatior*), and the federal threatened spreading navarretia (*Navarretia fossalis*). An additional three sensitive plant species not included in the MSHCP also have a low potential to occur: vernal barley (*Hordeum intercedens*), paniculate tarplant (*Deinandra aniculate*), and smooth tarplant (*Centromadia pungens laevis*).

Focused surveys for special status plant species were conducted by HELIX biologists on March 9 and 22, 2020. No special-status plants were detected or observed on the Project site and none are expected to occur. Furthermore, the Project site has been subject to previous agricultural use and disturbance from disking. Additionally, the Project site is not located within Narrow Endemic ~~Plan~~Plant Species Survey Area (NEPSSA) or Criteria Area Plant Species Survey area (CAPSSA) of the MSHCP. No mitigation would be needed to avoid impacts to MSHCP and special-status plants.

Project Mitigation Measures

MM Biol 1 **Nesting Bird Survey**. In order to avoid violation of the MBTA and the California Fish and Game Code, site preparation activities (ground disturbance, construction activities, staging equipment, and/or removal of trees and vegetation) for the Project shall be avoided, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species.

If site-preparation activities are proposed during the nesting/breeding season, the Project proponent shall retain a qualified biologist to conduct a pre-activity field survey prior to the issuance of grading permits for the Project to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone.

If active nests are not located within the 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, the Biologist shall immediately establish a conservative avoidance buffer surrounding the nest based on their best professional judgement and experience. The Biologist shall monitor the nest at the onset of project activities, and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the Biologist determines that such project activities may be causing an adverse reaction, the Biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers will be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The on-site qualified biologist will review and verify compliance with these nesting avoidance buffers and will verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found. Upon completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to City for mitigation monitoring compliance record keeping.

MM Biol 2 **Burrowing Owl Preconstruction Survey**. The Project proponent shall retain a qualified biologist to conduct a pre-construction survey for resident burrowing owls within 30 days prior to commencement of grading and construction activities on the Project site. The survey will include the Project site and all suitable burrowing owl habitat within a 500-foot buffer. The results of the survey will be submitted to the City prior to obtaining a grading permit. In addition, if burrowing owls are observed during the MBTA nesting bird survey, to be conducted within three days prior to ground disturbance or vegetation clearance, the observation shall be reported to the Wildlife Agencies. If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity will be conducted in accordance with the current Burrowing Owl Survey Instructions for the Western Riverside MSHCP.

If burrowing owl are detected, the CDFW shall be sent written notification by the City, within three days of detection of burrowing owls. If active nests are identified during the pre-construction survey, the nests shall be avoided and the qualified biologist and Project Applicant shall coordinate with the City of Perris Planning Department, the USFWS, and the CDFW to develop a Burrowing Owl Plan to be approved by the City in consultation with the CDFW and the USFWS prior to commencing Project activities. The Burrowing Owl Plan shall be prepared in accordance with guidelines in the CDFW Staff Report on Burrowing Owl (March 2012) and MSHCP. The Burrowing Owl Plan shall describe proposed avoidance, minimization, relocation, and monitoring as applicable. The Burrowing Owl Plan shall include the number and location of occupied burrow sites and details on proposed buffers if avoiding the burrowing owls and/or information on the adjacent or nearby suitable habitat available to owls for relocation. If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities

for relocated owls may also be required in the Burrowing Owl Plan. The Permittee shall implement the Burrowing Owl Plan following CDFW and USFWS review and concurrence. A final letter report shall be prepared by the qualified biologist documenting the results of the Burrowing Owl Plan. The letter shall be submitted to the CDFW prior to the start of Project activities. When a qualified biologist determines that burrowing owls are no longer occupying the Project site per the criteria in the Burrowing Owl Plan, Project activities may begin.

If burrowing owls occupy the Project site after Project activities have started, then construction activities shall be halted immediately. The Project proponent shall notify the City and the City shall notify the CDFW and the USFWS within 48 hours of detection. A Burrowing Owl Plan, as detailed above, shall be implemented.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. HELIX biologists identified two riverine features and twelve pools on the Project site. The MSHCP ~~identified~~defines "riparian" and "riverine" features as those which are natural in origin, as well as part of natural features that have been modified and/or redirected and can include features indirectly created through manipulation of the landscape, including channelization of a historic riverine feature. If these features connect to nearby downstream resources that are either existing or described conservation lands, they would be considered riverine. Riparian features are those with vegetation dependent upon a water source such as a stream, drainage pond, or similar. A Riparian/Riverine and Vernal Pool habitat assessment was conducted by Mr. Hogenauer during a site visit on October 5, 2020. The assessment was conducted concurrently in the field with the aquatic resources delineation and updated during additional visits in February and March 2021. The initial evaluation on October 5, 2020, consisted of a directed search for field characteristics indicate of Riparian/Riverine habitats. The March 2021 visit consisted of a focused survey for Riparian/Riverine and Vernal Pool plant species. ~~The surveys concluded that the two features and several pools features were determined not to be riparian water features or vernal pools under MSHCP and CDFW guidelines. The two riverine features identified were~~Two drainages were identified, labelled as Drainage 1 and Drainage 2. Drainage 1 is compromised of the concrete ditch located along the Ramona Expressway and the earthen bottom connection to a box culvert. Drainage 2 originates from a box culvert and flows onto the site for 23 feet, then changes to sheet flow for an additional 55 feet, where it dissipates. Both Drainages originate from culverts.

~~A~~The concrete brow ditch and associated earthen channel are storm drain features constructed in uplands. ~~Per the MSHCP, features that are artificially created in uplands do not meet the definition of an MSHCP riverine feature.~~These features do not contain riparian habitat or other sensitive natural community. Therefore, no impact to a riparian habitat or sensitive natural community will occur. However, the brow ditch does have a downstream connection to the Perris Valley Storm Drain. Based on this downstream connection, Drainage 1 is considered by the CDFW to be a State water. For impacts related to MSCHP resources and State waters, please refer to item c) below.

For the vernal pool analysis, historical aerial photos of the site from 2018, 2014, 2011, 2006, and 1966 were reviewed to aid in the identification of potential vernal pools. Vernal pools were assessed during the Riparian/Riverine survey conducted on October 5, 2020. Vernal pool indicators searched for include

standing water, cracked soil, presence of certain plan species, and changes in soil or vegetation characteristics. Soils information was gathered from the U.S. Department of Agriculture online database (USDA 2020). Due to potential vernal pools (or ephemeral pools) being detected during the October 5 survey, the site was surveyed again on January 5 and February 5, 2021. Both visits in 2021 were conducted approximately one week following a significant rain event to ensure the mapping effort did not include short-lived non-jurisdictional puddles.

The Project site includes 12 pools on the eastern side of the property that hold water for at least seven days. All but one of the pools occur on the hardpan dirt/gravel surface in the northeast that was used as a parking lot in the past. The manipulation of the land to be used as a parking lot resulted in several low spots that now pool from rainfall. These pools (1-11) on the hardpan surface essentially unvegetated and are disturbed due to vehicle traffic and unauthorized dumping. These are artificial features and not naturally occurring.

One pool, (Pool 12, the largest of the pools), occurs in the southeast area of the site. Pool 12 occurs on land that was used as active agriculture through 2005. This pool occurs adjacent to the commercial property located at the northwest corner of Ramona Expressway and Perris Drive. This area now pools as a result of the commercial property and adjacent Ramona Expressway being constructed a slighter higher topographic elevation than the subject property. Pool 12 is not naturally occurring, but rather the result of the manipulation of the adjacent land. A review of historic aerials shows the first sign of water pooling at the location of Pool 12 occurs in 2011~~.~~ at approximately the same time that the box culvert was installed under Indian Avenue. Vegetation within Pool 12 is similar to the adjacent land within the fallow agricultural field. No wetland or vernal pool indicator plant species was observed in the pool. The pools total 0.604 acres. It is unknown if this pool historically existed prior to agricultural use of the land but a review of historical aerials dating back to 1966 do not show a pool at this location. The source of water for this pool is primarily uncontrolled flows entering the site from the box culvert and storm drain overflows. Pool 12 has limited functions and services, consisting of minimal potential sediment, toxin, and nutrient trapping. These pools do not meet the definition of riparian habitat or a sensitive natural community and no impacts associated with this threshold will occur. Please refer to questions c) and f) below for further discussion of these pools.

Therefore, HELIX biologists concluded that the impacts to riparian or other sensitive vegetation communities, including special-status vegetation communities would be less than significant.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less than Significant with Mitigation Incorporated. Approximately 0.58 ~~acres~~acre of ~~wetland habitat~~aquatic resources on the Project site was identified to be under jurisdiction of the ~~CDFW/~~RWQCB~~.~~ and 0.19 acre of aquatic resources was identified as under the jurisdiction of the CDFW. Drainage 1 is comprised of a short earth bottom channel that connects to a ~~create~~concrete brow ditch along the Ramona Expressway that serves as a storm drain, including flows from the box culvert under Indian Avenue and a storm drain under Ramona Expressway. Flow from the box culvert bifurcates with a portion of flows entering Drainage 1 and other flows forming Drainage 2. Drainage 2 flows onto the site for a short distance ~~923~~(23 feet) then transitions to a 10-foot-wide sheet flow. Both drainages originate from culverts with flows that primarily are from artificial sources.

~~Pool 12 is also considered jurisdictional as a water of the State. Flows from the box culvert contribute to the ponding of this pool. The flows from the box culvert are~~ The concrete brow ditch and earthen channel associated with Drainage 1 are storm drain features constructed in uplands. Because Drainage 1 has a downstream connection to the Perris Valley Storm Drain, it is considered by the CDFW to be a State water. Drainage 2 having bed and bank is also considered by the CDFW to be a State water. Both Drainage 1 and Drainage 2 are also considered waters of the State by the RWQCB and determined by the CDFW to be protected under the MSHCP as Riparian/Riverine and Vernal Pools resources. Pool 12 as described in b) above is also considered potentially jurisdictional as a water of the State by the RWQCB. Concurrence from the RWQCB is required to confirm pools 1 through 11 are not waters of the State and Pool 12 is considered a water of the State. However, based on the lack of bed, bank, and downstream resource connection, it is not considered a CDFW jurisdictional resource (CDFW 2022) but is considered protected under the MSHCP as Riparian/Riverine and Vernal Pools resources Flows from the box culvert contribute to the ponding of this pool. The flows from the box culvert may be partially from the re-direction a naturally occurring stream (waters of the State) but mostly from runoff of the existing developments located north and west of the Project site. The artificially increased flows and increase in elevation from development to the southeast result in the formation of Pool 12.

Impacts to waters of the State and MSCHP Riparian/Riverine and Vernal Pools resources would result from the construction of the reach of Line E within the property limits and from the development of the proposed warehouse and associated infrastructure. The storm drain flows would be directed into the reach of Line E, which would connect to an existing storm drain lateral at the western edge of Perris Boulevard to allow flow to continue to the east and connect to the Perris Valley Sanitation District. This interim proposed connection of Line E would be in place until such time as the City constructs additional downstream sections of the Line E storm drain that are not part of this Project. In coordination with the agencies, the required DBESP, and the permitting processes, Project Mitigation Measure MM Biol 3 will reduce impacts to MSCHP resources and Project Mitigation Measure MM Biol 4 will reduce impacts to RWQCB and CDFW waters of the State to less than significant levels.

~~The proposed Project impacts would require a Streambed Alteration Agreement from CDFW and a Waste Discharge Requirement from RWQCB. The following Project mitigation measure (MM Bio 1) would reduce impacts to waters of the State to less than significant levels.~~

Based on aquatic resource delineation, the drainages and pools on-site are not waters of the U.S. jurisdictional to the USACE. The drainages on-site, as described above, are storm drain flood control features constructed in uplands and only flow in direct response to precipitation resulting in stormwater runoff. Storm drain features constructed in uplands are not considered to be waters of the U.S. The brow ditch flows in direct response to rainfall runoff, with flows typically lasting from a day to a week depending on the amount and frequency of rainfall. Based on confirmation with USACE staff, which included a review of site conditions, the storm drain (Drainage 1) constructed in uplands is not a water of the U.S. ~~Since no other waters in the study area have a downstream connection to a water of the U.S., the other waters in the study area are also not waters of the U.S., resulting in~~(USFWS 2021). No impacts to waters of the U.S. are proposed, as none occur on the property. A request for a formal letter stating no waters of the U.S. occur on the property will be submitted to the USACE as part of the permitting process.

~~While the Project will result in impacts to all waters of the State on the property, no impacts to waters of the U.S. are proposed, as none occur on the property.~~

Project Mitigation ~~Measure~~Measures

MM ~~Bio 1~~Biol 3 The Project proponent shall provide mitigation to address the Project impacts to 0.58 acre of MSHCP Riparian/Riverine and Vernal Pool Resources consisting of 0.19 acre of Riverine habitat and 0.39 acre of pool habitat. Mitigation shall be provided in accordance with the Final DBESP, which can be accomplished through the purchase of rehabilitation credits at the Riverpark Mitigation Bank. Final mitigation requirements will be determined through the permitting process with the CDFW and RWQCB.

MM Biol 4 Prior to the City's issuance of a grading permit for the Project site and prior to the start of Project activities, the ~~Applicant~~ Project proponent shall ~~demonstrate proof of purchase of mitigation credits at a 2:1 ratio for impacts to Pool 12.~~

~~This 2:1 mitigation ratio and mitigation type are proposed, given the flows on-site are mainly artificial and the adjacent lands resulted in an increase in elevation that contributed to the formation of Pool 12. Drainage 2 (sheet flow and channel) and the earthen bottom portions of Drainage 1 that are the result of storm drains flows are proposed to be mitigated with 1:1 rehabilitation credit. Purchase of mitigation credits is not proposed for the impacts to the concrete brow ditch of Drainage 1, as this will be replaced on-site with the construction of Line E.~~notify the California Department of Fish and Wildlife (CDFW) of planned impacts to Fish and Game Code Section 1602 resources. The Project proponent shall either receive a Streambed Alteration Agreement or written documentation from the CDFW that a Streambed Alteration Agreement is not needed. The Project proponent shall also obtain a report of Waste Discharge Requirement from the RWQCB. Mitigation for impacts to CDFW and RWQCB waters will be determined during the permitting process with the agencies.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact. The Project site is not located within a MSHCP Criteria Cell Group, Conservation area or other conservation land (Appendix C). The land uses surrounding the Project site include a mix of vacant and undeveloped land to the north, industrial uses to the south and west, and a mix of vacant land, commercial uses, and non-conforming residential uses to the east. Therefore, the Project site is not located near any open space or native habitats and does not represent a wildlife corridor between large open space habitats. Impacts would be less than significant and no mitigation would be required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. Projects located within the MSHCP are subject to the MSHCP LDMF. MSHCP reserve land purchase and management are funded by the collection of the LDMF. The LDMF is determined by the RCA and adjusted annually. ~~These fees are adjusted annually and recently had a significant increase.~~ The current fee for commercial and industrial developments is set at $16,358 per acre. The Project would comply with all applicable provisions of the MSHCP as described in the responses to questions a) and f). No other policies or ordinances are applicable to this Project. With payment to the LDMF, impacts would be less than significant and no mitigation would be required.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant Impact. The Project is within the Stephens' Kangaroo Rat Habitat Conservation Plan (SKRHCP) area; therefore, the Project Applicant is required to pay a Stephens' kangaroo rat mitigation fee in accordance with the SKRHCP. The SKRHCP fee for the Project shall be an amount determined in coordination with the County. The standard fee is $500 per acre (County 1996).

The Project site is located within the Mead Valley Area Plan of the Western Riverside MSHCP. The Project is not within a MSHCP Criteria Cell or Conservation Area. Because of this, the Project site is not in an area that has been set aside for conservation, nor is it in an area subject to the Habitat Evaluation and Acquisition Negotiation Strategy or Joint Project Review process.

In accordance with the MSHCP, the proposed Project was reviewed for consistency with the MSHCP Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pool), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.4 (Fuels Management). The ~~Project's consistency~~Project would comply with the applicable provisions of Sections 6.1.2 and 6.1.3 are described above in question a). The Project's consistency with MSHCP Sections 6.1.4 and 6.4 are described below.

MSHCP Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools))

Section 6.1.2 of the MSCHP discusses protection of species associated with Riparian/Riverine and Vernal Pool resources and includes specific definitions for each. As discussed above in question a, plant and animal species considered sensitive under MSHCP Section 6.1.2 do not occur on the project site. Riparian habitat does not occur on the project site. The riverine habitat does occur on site and is subject to the requirements of the MSHCP. The flows in Drainage 1 connect to downstream resources (the PVSD) and have potential to support the MSHCP Section 6.1.2 species that may occur downstream. The riverine features onsite are the same as the RWQCB waters of the State resources discussed in question c) above and total 0.19 acre of drainage consisting of 0.17 acre of concrete brow ditch storm drain and 0.02 acre earthen channel. The concrete brow ditch is to be replaced on site as part of the Project design. As discussed in question c) above the storm drain flows will continue to connect to the downstream resources via Line E and the replaced concrete brow ditch.

The Project site also includes 12 pools. Eleven of the pools occur on a section of the project site that is a dirt and gravel parking lot. The 11 pools in the parking lot area are formed and regularly impacted by the parking lot. These parking lot pools are not considered pools that meet the definition of sensitive pools under the MSHCP. As discussed in question a above, all 12 pools were surveyed for sensitive fairy shrimp and no sensitive fairy shrimp occur in the pools. Pool 12 does also does not meet the MSHCP definition of a Vernal Pool, but the MSCHP allow for this determination to be made on a case-by-case basis and was determined to be an MSCHP resource by CDFW. The 0.39 acre Pool 12 was originally classified a CDFW State water, but during the conversation with CDFW on September 22 it was determined that the Pool is not a CDFW water but is an MSHCP water. MSHCP impacts and mitigation related to Pool 12 have been addressed in coordination with the agencies and through Project Mitigation Measure MM Biol 3 as described in c) above.

MSHCP Section 6.1.4 (Guidelines Pertaining to the Urban/Wildland Interface)

Section 6.1.4 of the MSHCP outlines policies intended to minimize the indirect effects associated with locating development in close proximity to the MSHCP Conservation Area. To minimize these indirect effects, the guidelines shall be implemented in conjunction with the review of individual public and private development projects that are located in proximity to the MSHCP Conservation Area. The review of such implementing development and infrastructure projects is required to address drainage, toxics, lighting, noise, invasive species, barriers, and grading/land development.

The proposed Project site is not within a Criteria Cell and lands immediately adjacent to the Project site are not within a Criteria Cell which would include MSHCP Conservation Areas. The land surrounding the Project site is a mix of vacant, industrial, and commercial uses. Therefore, the Project is not subject to Section 6.1.4 of the MSHCP.

MSHCP Section 6.4 (Fuels Management)

Section 6.4 of the MSHCP focuses on hazard reduction for human safety in a manner compatible with public safety and conservation of biological resources. According to the Fuels Management Guidelines of the MSHCP, new development that is planned adjacent to the MSHCP Conservation Area, or other undeveloped areas, shall incorporate brush management within the development boundaries and shall not encroach into the MSHCP Conservation Area. The proposed Project is not located adjacent to or within an existing or proposed MSHCP Conservation Area. Therefore, the Project is consistent with this section.

In conclusion, the proposed Project would have a less than significant impact and no additional mitigation is required.

V. Cultural Resources

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	■	☐	☐
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	■	☐	☐
c)	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	■	☐	☐

A Cultural Resources Survey Report (HELIX 2022d) which is attached to this IS/MND as Appendix D, was prepared for the proposed Project. Its findings and recommendations are also incorporated into the following analysis.

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

There are no Standards and Guidelines included in the PVCCSP related to cultural resources. The Cultural Resources Survey (HELIX 2022d; Appendix D) was prepared for the Project in compliance with the following applicable PVCCSP EIR mitigation measure:

MM Cultural 1 Prior to the consideration by the City of Perris of implementing development or infrastructure projects for properties that are vacant, undeveloped, or considered to be sensitive for cultural resources by the City of Perris Planning Division, a Phase I Cultural Resources Study of the subject property prepared in accordance with the protocol of the City of Perris by a professional archeologist[1] shall be submitted to the City of Perris Planning Division for review and approval. The Phase I Cultural Resources Study shall determine whether the subject implementing development would potentially cause a substantial adverse change to any significant paleontological, archeological, or historic resources. The Phase I Cultural Resources Study shall be prepared to meet the standards established by Riverside County and shall, at a minimum, include the results of the following:

1. Records searches at the Eastern Information Center (EIC), the National or State Registry of Historic Places and any appropriate public, private, and tribal archives.

2. Sacred Lands File record search with the Native American Heritage Commission (NAHC) followed by project scoping with tribes recommended by the NAHC.

3. Field survey of the implementing development or infrastructure Project site.

The proponents of the subject implementing development projects and the professional archaeologists shall also contact the local Native American tribes (as identified by the California Native Heritage Commission and the City of Perris) to obtain input regarding the potential for Native American resources to occur at the project site. Measures shall be identified to mitigate the known and potential significant effects of the implementing development or infrastructure project, if any. Mitigation for historic resources shall be considered in the following order of preference:

1. Avoidance

2. Changes to the structure provided pursuant to the Secretary of Interior's Standards

3. Relocation of the structure

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

4. Recordation of the structure to Historic American Buildings Survey (HABS)/Historic American Engineering Record (HAER) standard if demolition is allowed

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

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

The PVCCSP EIR includes additional mitigation measures that are relevant to cultural resources. These mitigation measures have been replaced by the City of Perris as reflected in Project Mitigation Measures MM Cult 1 and MM Cult 2.

Record Searches and Native American Correspondence

An archeological records search was conducted by HELIX staff archeologist, Mary Villalobos, at the EIC at the University of California, Riverside UCR. Although no resources were recorded within the Project boundaries, the records search identified 13 previously recorded cultural resources within a one-mile radius of the Project. All but one of the resources are historic, consisting mainly of sites associated with water conveyance and agriculture. One prehistoric resource occurs within the one-mile radius—a bedrock milling feature and associated lithic artifacts. Based on the results of the records search, a total of 48 previous cultural resource studies have been conducted within the record search limits, three of which overlap with the Project site.

HELIX archaeologists reviewed the National Register of Historic Places Index, the Office of Historic Preservation Archeological Determinations of Eligibility, and the Office of Historic Preservation Directory of Properties in the Historic Property Data File, and historic USGS maps for the following years and locations: 1953, 1967, 1973, and 1979 Perris, the 1901 Elsinore, and the 1942 Perries topographic maps. While no buildings or structures appear within or adjacent to the Project site on any of the topographic maps from before 1967, a well and a structure first appear on the 1967 Perris map and are present on the 1973 and 1979 Perris maps. The well is shown as existing in the northwest corner of the Project site, while the structure is located west of Perris Boulevard, adjacent to but outside of the Project site. The historic aerials consulted include photographic images dating to 1966, 1967, 1978, 1997 and 2002. The area surrounding the intersection of the Ramona Expressway and Perris Boulevard, including the Project site, appear to have been used primarily for agricultural purposes; the structure seen on the 1967 topographic map and visible on the aerials beginning in 1966 (the earliest available) appears to have been related to the agricultural activity. By the time of the 2002 aerial, the currently existing gas station southeast of the Project site is shown in the area of these former agricultural buildings. The well shown

on the 1967 topographic map was not visible in any of the consulted aerial photographs, likely due to its small size.

HELIX requested a records search of the Sacred Lands File (SLF) of NAHC, which did not indicate the presence of any sacred sites or locations or religious or ceremonial importance with the Project site. In accordance with the NAHC, HELIX contacted all Native American consultants listed in the NAHC response letter and received four responses to date. The Augustine Band of Cahuilla Indians stated that the Tribe is unaware of specific cultural resources that may be affected by the Project. The Agua Caliente Band of Cahuilla Indians stated that the Project site is not located within the Tribe's Traditional Use Area. As such, they defer to local tribes. The Rincon Band of Luiseño Indians responded in a letter that the Project location is within the Territory of the Luiseño people and within Rincon's specific area of Historic interest. "Embedded in this Luiseño territory are Rincon's history, culture and identify. The proposed Project site is located in a cultural significant area." The Rincon Band recommended that an archeological record search be conducted and asked to receive a copy of this cultural resources survey report. The Soboba Band of Luiseño Indians responded in a letter sent via email that the Project site falls within the bounds of Soboba's Tribal Traditional Use Areas. "This [P]roject location is in proximity to known sites, is a shared use area that was used in ongoing trade between the tribes and is considered to be culturally sensitive by the people of Soboba." The Tribe indicated they wish to initiate consultation with the Project Applicants and lead agency and requested that "Native American Monitor(s) from the Soboba Band of Luiseño Indians Cultural Resource Department to be present during any ground disturbing proceedings." Refer to Section XVIII for more information regarding Tribal Cultural Resources.

Pedestrian Survey

A pedestrian survey of the Project site was conducted on October 8, 2020 by HELIX staff archaeologist, Mary Villalobos, and Alex Lopez from Soboba. Ground visibility was excellent for the Project site; with the exception of the northwest corner of the Project site, visibility was 100 percent. The visibility in the northwestern corner of the Project site was approximately 50 percent, due to the presence of grasses. A small portion of the east side of the Project site, adjacent to and north of the gas station located southeast of the Project site had been graded and the soil contained gravel. Soil in the remainder of the Project site consisted of medium brown sandy silt with no rocks. Modern trash and construction debris were scattered around the entire Project site, but no potential cultural resources were observed in the Project site.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Less Than Significant with Mitigation Incorporated. Based on the results of the cultural resources assessment conducted for the Project (HELIX 2022d; Appendix D), while 13 cultural resource properties have been recorded within a one-mile radius of the Project site no known cultural resources/historical resources are present on the Project site. However, there is the potential for previously undiscovered subsurface cultural resources to occur in the alluvial soils at the Project site. Ground disturbing activities could harm previously undiscovered subsurface resources which would be a potentially significant impact. The Cultural Resources Survey recommends that an archaeological and Native American monitoring program be implemented. This will be implemented through Project mitigation measure MM Cult 1. Project mitigation measure MM Cult 1 implements PVCCSP EIR mitigation measures MM Cult 2 through MM Cult 4, as subsequently revised by the City of Perris. With implementation of the proposed mitigation, impacts to cultural resources would be less than significant.

Project Mitigation Measures

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

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

The Project Applicant shall also enter into an agreement with either the Soboba Band of Luiseño Indians or the Pechanga Band of Luiseño Indians for a Luiseño tribal representative (observer/monitor) to work along with the consulting archaeologist. This tribal representative will assist in the identification of Native American resources and will act as a representative between the City, the project proponent/developer, and Native American Tribal Cultural Resources Department. The Luiseño tribal representative(s) shall be on-site during all ground-disturbing of each portion of the project site including clearing, grubbing, tree removals, grading, trenching, etc. The Luiseño tribal representative(s) should be on-site any time the consulting archaeologist is required to be on-site. Working with the consulting archaeologist, the Luiseño representative(s) shall have the authority to halt, redirect, or divert any activities in areas where the identification, recording, or recovery of Native American resources are on-going.

The agreement between the proponent/developer and the Luiseño tribe shall include, but not be limited to:

- An agreement that artifacts will be reburied on-site and in an area of permanent protection;
- Reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist;
- Native American artifacts that cannot be avoided or relocated at the project site shall be prepared for curation at an accredited curation facility in Riverside County that meets federal standards (per 36 CFR Part 79) and available to archaeologists/researchers for further study; and

- The project archaeologist shall deliver the Native American artifacts, including title, to the identified curation facility within a reasonable amount of time, along with applicable fees for permanent curation.

The Project Applicant shall submit a fully executed copy of the agreement to the City of Perris Planning Division to ensure compliance with this condition of approval. Upon verification, the City of Perris Planning Division shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.

In the event that archeological 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 discovered at the development site during the monitoring program shall be recorded and inventoried by the consulting archaeologist.

If any Native American artifacts are identified when Luiseño tribal representatives are not present, all reasonable measures will be taken to protect the resource(s) *in situ* and the City Planning Division and Luiseño tribal representative will be notified. The designated Luiseño tribal representative will be given ample time to examine the find. If the find is determined to be of sacred or religious value, the Luiseño tribal representative will work with the City and Project archaeologist to protect the resource in accordance with tribal requirements. All analysis will be undertaking in a manner that avoids destruction or other adverse impacts.

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

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

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

A report of findings, including an itemized inventory of recovered artifacts, shall be prepared upon completion of the steps outlined above. The report shall include all data outlined by the Office of Historic Preservation guidelines, including conclusions 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.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant with Mitigation Incorporated. As stated under discussion a) above, no known cultural resources are present on the Project site; however, ground disturbing activities have the potential to encounter previously undiscovered archaeological resources, which would result in a potentially significant impact. Implementation of Project mitigation measure MM Cult 1 during construction would reduce the impact to a less than significant level.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant with Mitigation Incorporated. The proposed Project site has been historically used for agriculture and has since been vacant. No known cemetery has occurred at the Project site or off-site improvement areas, so the Project site is not expected to contain human remains, including those interred outside of formal cemeteries. In the unlikely event that human remains are discovered during construction, all activities in the vicinity of the remains shall cease and the contractor shall notify the County Coroner immediately pursuant to California Health & Safety Code Section 7050.5 and California Public Resources Code Section 5097.98. Project mitigation measure MM Cult 2 shall be implemented to ensure impacts to human remains are less than significant. Project mitigation measure MM Cult 2 implements PVCCSP EIR mitigation measure MM Cult 6, as subsequently revised by the City of Perris.

Project Mitigation Measures

MM Cult 2 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(s) shall immediately stop all activities within 100 feet of the find. The Project Applicant shall then inform the Riverside County Coroner and the City of Perris Planning Division immediately and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).

If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the Most Likely Descendent (MLD). Despite the affiliation of any Luiseño tribal representative(s) at the site, the NAHC identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of the Native American human remains and may recommend to the Project Applicant 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 Applicant and the MLD. In the event that there is disagreement regarding the disposition of the remains, State law will apply and median with the NAHC will make the

applicable determination (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

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

VI. Energy

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

Applicable PVCCSP Standards and Guidelines

Section 1.2 (Specific Plan Vision and Objectives) of the PVCCSP encourages increased energy efficiency in building design and the offering of incentives for LEED certification. Section 4.2.4 (Lighting) of the PVCCSP requires lighting standards to be energy efficient. No other PVCCSP Standard and Guidelines are applicable to the analysis of energy.

The proposed Project is required to adhere to PVCCSP EIR Mitigation Measures MM Air 19 and MM Air 20. PVCCSP EIR Mitigation Measure MM Air 19 requires implementing development projects to include installation of energy-efficient street lighting throughout project sites. PVCCSP Mitigation Measure MM Air 20 requires each implementing development project 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. See Section VIII, Greenhouse Gas Emissions for the full mitigation measure text.

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during ~~MAXIMUM INCREMENTAL CANCER HEALTH RISK~~ project construction or operation?

Less Than Significant Impact. During construction, the project would temporarily consume energy for the operation of construction equipment and vehicles. Standard methods of earth moving, excavations, building construction, and paving are planned. Construction activities do not include methods of construction which would result in inefficient or unnecessary use of energy resources. For operational energy use, the project would be required to meet CCR Title 24 building energy and CALGreen green standards.

CCR Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. Energy-efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for space or water heating) results in greenhouse gases (GHG) emissions. The Title 24 standards are updated approximately every three years to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2019 Title 24 standards went into effect on January 1, 2020. The standards are divided into three basic sets. First, there is a basic set of mandatory requirements that apply to all buildings. Second, there is a set of performance standards—the energy budgets—that vary by climate zone (of which there are 16 in California) and building type; thus, the standards are tailored to local conditions. Finally, the third set constitutes an alternative to the performance standards, which is a set of prescriptive packages that are basically a recipe or a checklist compliance approach.

CALGreen (CCR Title 24, Part 11) is a code with mandatory requirements for all nonresidential buildings (including industrial buildings) and residential buildings for which no other state agency has authority to adopt green building standards. The current 2019 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings went into effect on January 1, 2020. The development of CALGreen is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction. CALGreen contains requirements for storm water control during construction; construction waste reduction; indoor water use reduction; material selection; natural resource conservation; site irrigation conservation; and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

Compliance with state Title 24 and CALGreen standards, and PCSCCP design standards and guidelines, and PVCCSP EIR mitigation measures MM Air 19 and MM Air 20 would ensure the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. No further Project-specific mitigation measures would be required.

Implementation of the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resource that may have a significant impact on the environment. Impacts would be less than significant and no mitigation would be required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. Several levels of government have implemented regulatory programs in response to reducing GHG emissions, which consequently serve to increase energy efficiency. Several state agencies, including CARB, California Energy Commission, California Public Utilities Commission, CalRecycle, California Department of Transportation (Caltrans), and the Department of Water Resources have developed regulatory and incentive programs that promote energy efficiency. Many of the measures are generally beyond the ability of any future development to implement and are implemented at the utility provider or the manufacturer level.

The Project does not conflict with any state or local plans for renewable energy efficiency. The Project would employ standard methods of construction and does not propose to create a project condition post-construction whereby increased energy demand would be created. The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. There would be no impact.

VII. Geology and Soils

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

The discussion below is based on a Geotechnical Engineering Investigation prepared by NorCal Engineering (NorCal Engineering 2020; Appendix E), and a Paleontological Technical Study, prepared by Paleo Solutions, Inc (Paleo Solutions 2020; Appendix F).

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

There are no PVCCSP Standard and Guidelines applicable to the analysis of geology and soils. The Geotechnical Engineering Investigation was prepared for the Project in compliance with the following applicable PVCCSP EIR mitigation measure:

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

In addition, PVCCSP EIR mitigation measure MM Cult 5 provides mitigation for the discovery and protection of paleontological resources. This mitigation measure has been replaced by the City of Perris as reflected in Project Mitigation Measure MM Geo 1.

Regulatory Framework

The following regulatory framework was provided by the Paleontological Report and is based on the City of Perris General Plan, which has one goal, one policy, and three implementation measures relating to paleontological resources. They are as follows:

- Goal 4 requires the protection of historical, archaeological, and paleontological sites.
- Policy IV A requires that the City of Perris comply with state and federal regulations and ensure preservation of the significant historical, archaeological, and paleontological resources within the City.
- The three implementation measures require that all new construction involving grading require appropriate surveys and necessary site investigations in conjunction with the earliest environmental documents prepared for a project, that in specifically delineated areas shown on the City's paleontological sensitivity map that levels of paleontological monitoring will be required, from full-time monitoring to part-time monitoring in some less-sensitive areas. Finally, the General Plan requires that the City of Perris identify and collect previous surveys of cultural resources, evaluate each resource, and consider preparation of a comprehensive citywide inventory of cultural resources including both prehistoric sites and man-made resources.

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involve

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?

No Impact. The City, like the rest of southern California, is located within a seismically active region as a result of being located near the active margin between the North American and Pacific tectonic plates. The Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to identify earthquake fault zones along traces of both recently and potentially active major faults. Cities and counties that contain such zones must inform the public regarding the location of these zones, which are usually one-quarter mile or less in width. Proposed development plans within these earthquake fault zones must be accompanied by a geotechnical report prepared by a qualified geologist describing the likelihood of surface rupture. As discussed in the Geotechnical Engineering Investigation, the Project site is not within an Alquist-Priolo Fault Zone. The Elsinore Fault Zone is the nearest Alquist-Priolo Earthquake Fault Zone that is located approximately 10 kilometers (or about 6.2 miles) east of the Project site. Due to this distance, it is unlikely that the Project would be subjected to fault rupture associated with the Elsinore Fault Zone. No impact associated with faults and rupture would occur at the Project site.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project site is located within the seismically active southern California region. Active faults are those faults which have had surface displacement within Holocene times (about the last 11,000 years). The Geotechnical Engineering Investigation prepared for the Project concluded that “ground shaking originating from earthquakes along other active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults.” Engineering and construction of the Project would be required to be in conformance with the International Code Council (ICC) International Building Code (IBC) and related California Building Code (CBC), and other applicable standards. Due to distances from active faults in the region, as well as conformance with standard engineering practices and design criteria, the Project would not directly or indirectly cause adverse effects related to seismic ground shaking. Impacts associated with seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon that occurs when soil undergoes transformation from a solid state to a liquefied condition when subjected to high intensity ground shaking. This typically occurs where susceptible soils (particularly the medium sand to silt range) are located over a high groundwater table (within 50 feet of the surface). Affected soils lose all strength during liquefaction and foundation failure can occur. The Project’s Geotechnical Engineering Investigation concluded that the Project site is in an area with low potential for liquefaction hazards due to the lack of groundwater within 50 feet of the ground surface. Also, the Project site is identified in the City’s General Plan to be an area of “low generalized liquefaction susceptibility” (City of Perris 2005). Therefore, impacts related to exposing people or structures to seismic-related ground failure, including liquefaction, would be less than significant and no mitigation would be required.

iv. Landslides?

No Impact. The Project site is relatively flat and there are no hillsides or steep topographic features at the site or in surrounding areas. According to the City's General Plan Safety Element, the Project site is not located within an area with high susceptibility to seismically induced landslides and rockfalls (City of Perris 2005). As such, there would be no impacts related to landslides as a result of the proposed Project.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Soil exposed by construction activities could be subject to erosion if exposed to heavy rain, winds, or other storm events. There is the potential for soil erosion or loss of topsoil during construction activities as the ground is cleared and graded. Compliance with the SCAQMD Rule 403 (Fugitive Dust) and PVCCSP EIR mitigation measure MM Air 3 would include implementation of soil stabilization measures, such as daily watering, and compliance with the National Pollution Discharge Elimination System (NPDES) General Construction Permit would include implementation of the City's standard erosion control practices, such as silt fencing, fiber rolls, or sandbags. Further, the CBC requires an erosion control and grading plans prior to issuance of a grading permit as a means to minimize soil erosion to the extent practicable during both construction and operational phases.

Once operational, the Project site would include some impervious or semi-impervious features, that if not designed properly could allow for stormwater to sheet flow and consequently erode soils. However, the preparation of a WQMP would describe the management of stormwater flows so as to not carry soils and sediments. The WQMP (as well as a Storm Water Pollution Prevention Plan [SWPPP]) must be approved by the City Engineer prior to the issuance of grading permits. Additionally, other features such as an underground water quality treatment and storage basin would capture storm flows that could otherwise be directed and erode loose soils across the site. Therefore, the required compliance with the various permits and plans would reduce Project impacts to less than significant levels and no mitigation would be required.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. The Project site is not located within an area that is subject to landslides, and so impacts related to landslides would not occur (City of Perris 2022). The Perris Valley is susceptible to subsidence in various portions throughout the region. However, impacts related to liquefaction, lateral spreading, or subsidence would not be significant because the proposed Project would comply with the CBC building safety design standards. Furthermore, the Geotechnical Engineering Investigation indicated that the Project site is not likely to experience liquefaction or subsidence due to the depth of groundwater below the site (NorCal Engineering 2020). Therefore, impacts associated with subsidence and liquefaction would be less than significant and no mitigation would be required.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. The majority of soil that underlies the Project site has a low to moderate potential for shrinking and swelling (NorCal Engineers 2021). Furthermore, adherence to standard

engineering practices contained within the IBC and CBC would further reduce potential impacts to less than significant and no mitigation would be required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The proposed Project does not include the implementation of septic tanks or alternative wastewater disposal systems. No impact would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant with Mitigation. According to the City General Plan Conservation Element Figure CN-7, the Project site is located near areas identified as highly sensitive for the discovery of paleontological resources. The Paleontological Technical Report prepared by Paleo Solutions, Inc., identified sensitivity guidelines for paleontological resources based on the Riverside County EIR. "High Sensitivity A" resources are based on geologic formations or mapped rock units that are known to contain or have the correct age and depositional conditions to contain significant paleontological resources. These include rocks of Silurian or Devonian age and younger that have potential to contain remains of fossil fish, and Mesozoic and Cenozoic rocks that contain fossilized body elements and trace fossils such as tracks, nests, and eggs. "High Sensitivity B" is a sensitivity equivalent to High A, but is based on the occurrence of fossils at a specified depth below the surface. This category indicates fossils that are likely to be encountered at or below 4 feet of depth and may be impacted during construction activities.

The report stated that based on an evaluation of existing paleontological data, the Project site has a High Potential/Sensitivity (High A and High B) which is based on the presence of Holocene-age alluvial sediments and middle to early Pleistocene-age very old alluvial-fan deposits. Based on the ground disturbance necessary to complete the Project, there is potential for adverse direct impacts to scientifically significant paleontological resources within middle to early Pleistocene-age very old alluvial fan deposits, either at the surface or at depth. Because of the High Paleontological Sensitivity (High B) on the Project site, Project mitigation measures MM Geo 1 and MM Geo 2 shall be implemented to reduce impacts to less than significant levels. Project mitigation measure MM Geo 1 implements PVCCSP EIR mitigation measure MM Cult 5, as subsequently revised by the City of Perris. Project mitigation measure MM Geo 2 is incorporated based on the recommendations of the Paleontological Technical Report prepared for the Project.

Project Mitigation Measures

MM-Geo 1 Prior to the issuance of grading permits, the Project Applicant shall submit to and receive approval from the City, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The PRIMMP shall include the provision for a qualified professional paleontologist (or his or her paleontological monitor representative) to be on-site or any Project-related excavations that exceed three 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 the off-site Project improvement areas until the paleontologist has been approved by the City.

Monitoring shall be restricted to undisturbed subsurface areas of older Quaternary alluvium. The approved paleontologist shall be prepared to quickly salvage fossils as

they are unearthed to avoid construction delays. The paleontologist shall also remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontologist shall have the power to temporarily halt or divert grading equipment to allow for removal of abundant or large specimens.

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

A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered specimens. The report and inventory, when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontological resources.

MM Geo 2 Prior to the start of construction, a paleontological resources worker environmental awareness program (WEAP) training shall be presented to all earthmoving personnel to inform them of the possibility for buried resources and the procedures to follow in the event of fossil discoveries.

VIII. Greenhouse Gas Emissions

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

An Air Quality and Greenhouse Gas Emissions Technical Report (HELIX 2022a; attached to this IS/MND as Appendix A) was prepared for the proposed Project. The findings and recommendations contained in the report are incorporated into the following analysis.

Applicable PVCCSP Standards and Guidelines

The PVCCSP includes Standards and Guidelines relevant to the analysis of greenhouse gas (GHG) emissions impacts presented in this IS and summarized below are incorporated as part of the proposed Project; as such, they are assumed in the analysis presented in this section.

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

8.2.1.4 Employee Break Areas and Amenities

Buildings exceeding 100,000 sf shall require employee amenities such as, but not limited to, cafeterias, exercise rooms, locker rooms and shower, walking trails and recreational facilities. Inclusion of theses amenities in the project would encourage employee trip reduction, reducing associated transportation pollutant emissions.

The following mitigation measures from the PVCCSP EIR are applied to the proposed Project:

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

MM Air 20 Each implementing development project shall implement, at a minimum, an increase in each building's energy efficiency 15 percent beyond Title 24, and reduce indoor water use by 25 percent. All requirements 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.

MM Air 21 Each implementing development project shall implement, at a minimum, use of water conserving appliances and fixtures (low-flush toilets, and low-flow shower heads and faucets) within all new residential developments.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact. Given the relatively small levels of emissions generated by a typical development in relationship to the total amount of GHG emissions generated on a national or global basis, individual development projects are not expected to result in significant, direct impacts with respect to climate change. However, given the magnitude of the impact of GHG emissions on the global climate, GHG emissions from new development could result in significant, cumulative impacts with respect to climate change. Therefore, the potential for a significant GHG impact is limited to cumulative impacts.

The determination of significance is governed by State CEQA Guidelines Section 15064.4, entitled "Determining the Significance of Impacts from Greenhouse Gas Emissions." State CEQA Guidelines Section 15064.4(a) states, "[t]he determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to … [use a quantitative model or qualitative model]" (emphasis added). In turn, State CEQA Guidelines Section 15064.4(b) clarifies that a lead agency should consider "Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project." Therefore, consistent

with State CEQA Guidelines Section 15064.4, the GHG analysis for the proposed Project appropriately relies upon a threshold based on the exercise of careful judgement and believed to be appropriate in the context of this particular Project.

On December 5, 2008, the SCAQMD Governing Board adopted their Interim CEQA Greenhouse Gas Significance Threshold for Stationary Sources, Rules and Plans for projects where the SCAQMD is the lead agency. The SCAQMD's interim GHG significance threshold uses a tiered approach to determining significance. Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA. Tier 2 consists of determining whether or not the project is consistent with a GHG reduction plan that may be part of a local general plan, for example. Tier 3 establishes a screening significance threshold level to determine significance using a 90 percent emission capture rate approach, which corresponds to 10,000 MT CO2e emissions per year for stationary sources at industrial facilities. Tier 4, to be based on performance standards, is yet to be developed. Under Tier 5 the project proponent would allow offsets to reduce GHG emission impacts to less than the proposed screening level.

As the City does not currently have any approved quantitative thresholds related to GHG emissions, the quantitative analysis provided herein relies upon the SCAQMD adopted screening threshold for industrial facility projects of 10,000 metric tons (MT) carbon dioxide equivalent (CO_2e). Although the proposed project includes both an industrial use as well as a commercial use, it is not considered to be a mixed-use project, which is generally defined as a kind of urban development that blends multiple uses, such as residential, commercial, cultural, institutional, or entertainment into one space, where those functions are to some degree physically and functionally integrated, and that provides pedestrian connections. The City's use of the 10,000 MT CO_2e threshold is also considered to be conservative for the proposed project since it is being applied to all of the GHG emissions generated by the proposed project (i.e., area sources, energy sources, vehicular sources, solid waste sources, and water sources) whereas the SCAQMD's 10,000 MT CO_2e threshold applies only to the new stationary sources generated at industrial facilities.

The Project would generate GHG emissions in the short-term during construction and the long-term during operation. The Project's mass regional GHG emissions were estimated using CalEEMod Version 2020.4.0. Refer to the Air Quality and Greenhouse Gas Emissions Technical Report prepared for the Project for additional details regarding modeling methodology, assumptions, and model output data (HELIX 2022a; Appendix A).

Construction Emissions

Emissions of GHGs related to the construction of the Project would be temporary. As shown in Table 10, total GHG emissions associated with construction of the Project are estimated at 1,289 MT CO_2e for the warehouse and 393 MT CO_2e for the hotel. For construction emissions, SCAQMD guidance recommends that the emissions be amortized (i.e., averaged) over 30 years and added to operational emissions. Averaged over 30 years, the proposed construction activities would contribute approximately 43.0 MT CO_2e emissions per year for Phase 1 and 13.1 MT CO_2e emissions per year for Phase 2.

Table 10
ESTIMATED CONSTRUCTION GREENHOUSE GAS EMISSIONS

Year	Emissions ($MT CO_2e$)
Phase 1 2022	259.0
Phase 1 2023	903.0
Phase 1 2024	126.4
Phase 1 Total[1]	**1,289.4**
Phase 1 Amortized Construction Emissions[2]	*43.0*
Phase 2 2024	240.8
Phase 2 2025	152.6
Phase 2 Total[1]	**393.4**
Phase 2 Amortized Construction Emissions[2]	*13.1*

Source: CalEEMod; Appendix A
[1] Totals may not sum due to rounding.
[2] Construction emissions are amortized over 30 years in accordance with SCAQMD guidance.
MT = metric tons; CO_2e = carbon dioxide equivalent

Operational Emissions

Calculated total annual emissions for the Project, including amortized annual construction emissions, are shown in Table 11. Refer to the report in Appendix A for the CalEEMod output files for the Project.

Table 11
TOTAL ESTIMATED OPERATIONAL GREENHOUSE GAS EMISSIONS

Emission Sources	2024 Emissions ($MT CO_2e$)
Phase 1 Area Sources	<0.1
Phase 1 Energy Sources	132.7
Phase 1 Vehicular (Mobile) Sources	2,578.2
Phase 1 Solid Waste Sources	82.4
Phase 1 Water Sources	158.6
Phase 1 Subtotal[1]	**2,951.9**
Phase 1 Construction (Annualized over 30 years)	43.0
Phase 1 Total[1]	**2,994.94**
Phase 2 Area Sources	**<0.1**
Phase 2 Energy Sources	**1,145.5**
Phase 2 Vehicular (Mobile) Sources	**756.4**
Phase 2 Solid Waste Sources	**25.8**
Phase 2 Water Sources	**9.9**
Phase 2 Subtotal[1]	**1,937.6**
Phase 2 Construction (Annualized over 30 years)	**13.1**
Phase 2 Total[1]	**1,950.7**
PROJECT TOTAL[1]	**4,945.6**
SCAQMD Screening Threshold	**10,000**
Exceed Threshold?	**No**

Source: CalEEMod (output data is provided in Appendix A)
[1] Totals may not sum due to rounding.
[2] Emission per capita is the project total emissions divided by the project population (2,301.3/690).
MT = metric tons; CO_2e = carbon dioxide equivalent

As shown in Table 11, the Project emissions, including amortized construction emissions, would total 4,946 MT CO_2e per year and would not exceed the industrial facility SCAQMD GHG screening threshold of 10,000 MT CO_2e per year.

Impact Conclusion

Although Project GHG emissions would not exceed the SCAQMD threshold, the Project would be required to implement mitigation measures MM Air 19, MM Air 20, and MM Air 21 from the PVCCSP EIR. No further Project-specific mitigation measures would be required. Implementation of the Project would not generate GHG emissions that may have a significant impact on the environment, and the impact would be less than significant.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. There are numerous State plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The principal overall State plan and policy is AB 32, the California Global Warming Solutions Act of 2006. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. SB 32 would require further reductions of 40 percent below 1990 levels by 2030. Because the Project's operational year is post-2020, the Project aims to reach the quantitative goals set by SB 32. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the LCFS, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, compliance at the Project level is not addressed. Therefore, the proposed Project would not conflict with those plans and regulations.

The Project does not have a residential competent and would not result in regional population growth. The Project would seek a change in land use designation from commercial to light industrial for an approximately 13-acre portion of the Project site. As discussed in the air quality plan consistency analysis (Section 5.1), the average employment density for a warehouse or light industrial land use is lower than that for a commercial land use and the Project would be consistent with the employment growth assumptions used to develop the SCAG's RTP/SCS. As shown in Section 3.2, transportation-related emissions consistently contribute the most GHG emissions in California (41 percent in 2017). According to the VMT screening evaluation (Urban Crossroads 2022), the Project is located in an area with higher employee per capita than the City average. However, in accordance with City guidelines, projects that generate less than 500 average daily trips would not cause a substantial increase in the total citywide or regional VMT and are therefore presumed to have a less than significant impact on VMT. The project warehouse land use would result in 402 trips per day, below the 500 average daily trip thresholds. The proposed hotel component of the project would be considered a local serving land use which leads to shortened trips lengths and reduced VMT (Urban Crossroads 2022b). Therefore, the Project would not conflict with or obstruct implementation of the SCAG's RTP/SCS.

The City adopted a Climate Action Plan (CAP) in 2016, which contains state, regional, and local GHG reduction measures to achieve the GHG Perris community wide GHG reductions mandated by AB 32. Local GHG reduction measures contained in the CAP include:

E-1 Energy Action Plan
T-1 Bicycle Infrastructure Improvements
T-2 Bicycle Parking

T-3 End of Trip Facilities
T-4 Transit Frequency Expansion
T-5 Traffic Signal Coordination
T-6 Density
T-7 Mixed Use Development
T-8 Design/Site Planning
T-9 Pedestrian Only Areas
T-10 Limited Parking Requirements for New Development
T-11 Voluntary Transportation Demand Management
T-12 Accelerated Bike Plan Implementation
SW-1 Yard Waste Collection
SW-2 Food Scrap and Paper Diversion

In accordance with City zoning regulations and PVCCSP design standards and guidelines, the Project would support applicable measures by providing, bicycle parking, sidewalks, and transit demand management (commute trip reduction, ridesharing programs). In addition, the Project would be constructed in accordance with the energy-efficiency standards, water reduction goals, and other standards required by the 2019 Title 24 Part 6 Building Energy Efficiency Standards and Part 11 (CALGreen) Building Standards. Therefore, the Project would not conflict with or obstruct implementation of the City CAP.

The Project would not conflict with applicable GHG reduction plans including the SCAG's RTP/SCS and the City's CAP, the impact would be less than significant and no mitigation would be required.

IX. Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	■	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	■	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	■
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	■

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	■	☐
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	■	☐
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	■

A Phase I Environmental Health Assessment prepared by Environmental and Regulatory Specialists, Inc (EARSI 2021), which is attached to this IS/MND as Appendix G, was prepared for the proposed Project. Its findings and recommendations are incorporated into the following analysis.

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

The PVCCSP includes Standards and Guidelines relevant to development with the Airport Influence Zones. These Standards and Guidelines are summarized below and are incorporated as part of the proposed Project and are assumed in the analysis presented in this section.

Airport Overlay Zone (Chapter 2.0, Land Use Plan, of the PVCCSP)

2.1.6 Airport Overlay Zone

Accident Potential Zone II (APZ-II): This zone prohibits many uses that involve hazardous materials (such as gas stations), and those uses that have higher densities of people per acre. Non-residential development will be limited to those uses that have not more than 50 persons per acre at any time including hotels and motels. This zone prohibits new residential development, schools, or churches. It should be noted that there is some existing residential development in this area.

Airport Overlay Zone (Chapter 12.0 of the PVCCSP)

12.1 Prohibited Uses in Airport Overlay Zones

Zone B1 (Inner Approach/Departure Zone): encompasses areas of high noise and high accident potential risk within the inner portion of the runway approach and departure corridors. The zone is defined by the boundaries of APZs I and II, adjusted on the north to take into account the turning departure flight tracks. The majority of the zone is exposed to projected noise levels in excess of 65 dB Community Noise Equivalent Level (CNEL).

Zone C1 (Primary Approach/Departure Zone): encompasses most of the projected 60 dB CNEL contour plus immediately adjoining areas. The zone boundary follows geographic features. Accident potential risks are moderate in that aircraft fly at low altitudes over or near the zone. To the south, an area

beginning just beyond Nuevo Road—approximately five miles from the runway end—is excluded from the zone. Exposure to noise in this area is greater (above 60 dB CNEL), however, the accident potential risks at this distance from the runway are reduced by the altitude at which aircraft typically fly over the area. Single-event noise levels are potentially disruptive in this zone.

12.1.1 Compatibility with March Air Reserve Base

The PVCCSP area is located in MARB Airport Influence Zones I and II; therefore, all development within the Plan shall comply with the following measures:

- Avigation Easement
- Noise Standard
- Land Use and Activities
- Retention and Water Quality Basins
- Notice of Airport in the Vicinity
- Disclosure
- Lighting Plans
- Height Restrictions per Federal Aviation Regulations Part 77
- Clear Zone (Surface B)
- Approach/Departure Clearance Surface (Surface C)
- Inner Horizontal Surface (Surface E)
- Conical Surface
- Form 7460 (Notice of Proposed Construction or Alteration)

The PVCCSP EIR includes mitigation measures for potential impacts related to hazards and hazardous materials. Applicable mitigation measures are identified below.

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

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

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

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

MM Haz 5 The following uses shall be prohibited:

a) Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an

initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.

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

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

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

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

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

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Small amounts of potentially hazardous materials (e.g., fuel, lubricants, and solvents) may be used during construction activities. Hazardous materials used during Project construction would be transported, used, and stored in accordance with state and federal regulations regarding hazardous materials. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located in the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to requirements imposed by the EPA, DTSC, SCAQMD, and RWQCB. With mandatory compliance to applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Impacts would be less than significant.

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

Exposure of people or the environment to hazardous materials during operation of the Project may result from (1) the improper handling or use of hazardous substances; (2) transportation accidents; or (3) an unforeseen event (e.g., fire, flood, or earthquake). The severity of any such exposure is dependent upon the type and amount of the hazardous material involved; the timing, location, and nature of the event; and the sensitivity of the individuals or environment affected. As previously discussed, the U.S. Department of Transportation prescribes strict regulations for hazardous materials transport, as described in Title 49 of the Code of Federal Regulations (i.e., the Hazardous Materials Transportation Act); these are implemented by Title 13 of the California Code of Regulations. It is possible that vendors may transport hazardous materials to and from the Project; and the drivers of the transport vehicles must comply with the Hazardous Materials Transportation Act. Hazardous materials or wastes stored on site are subject to requirements associated with accumulation time limits, amounts, and proper storage locations and containers, and proper labeling. The amount of materials that would be handled at any one time for the proposed warehouse operations would be relatively small. Additionally, for removal of hazardous waste from the site, hazardous waste generators are required to use a certified hazardous waste transportation company which must ship hazardous waste to a permitted facility for treatment, storage, recycling, or disposal. With compliance with applicable regulations, operation of the Project would result in a less than significant impact related to a significant risk to the public or the environment through the potential routine transport, use, or disposal of hazardous materials and no mitigation would be required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. Hazardous materials releases can occur if there are existing hazardous materials at the Project site that would be disturbed by Project construction or operation, or if future Project construction or operation activities involve the handling of substantial amounts of hazardous materials with a potential to result in upset and accident conditions. A Phase I Environmental Site Assessment (ESA) was completed for the Project site in May 2020 involving records review, site reconnaissance, and interviews (EARSI 2021; Appendix G). The Phase 1 ESA concluded that the Project site has historically been undeveloped and has been in agriculture use dating back to at least 1901. The Project site is described as flat, recently disked, and without structures. No Recognized Environmental Conditions were documented or identified in the Phase 1 ESA related to potentially hazardous materials (EARSI 2021). Therefore, PVCCSP EIR mitigation measure MM Haz 7 is not required for the proposed Project.

During the temporary, short-term construction period, there is the possibility of accidental release of hazardous substances such as spilling of hydraulic fluid or diesel fuel associated with construction equipment maintenance. The level of risk associated with the accidental release of these hazardous

substances is not considered significant due to the small volume and low concentration of hazardous materials. The construction contractor would be required to use standard construction controls and safety procedures to avoid or minimize the potential for accidental release of such substances into the environment. Further, Project operations would involve warehouse and commercial use activities and it is possible that hazardous materials could be used by a future occupant's daily operations; however, future operations at the Project site would be required to comply with all applicable local, State, and federal regulations related to the transport, handling, and usage of hazardous materials. Therefore, the impact of the proposed Project with respect to exposing the public or the environment to hazardous materials through upset and accident conditions would be less than significant and no mitigation would be required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The Project site is not located within one-quarter mile of a school as the school nearest to the Project site is approximately 1.25 miles southeast of the Project site (e.g., May Ranch Elementary School). Furthermore, the use of these materials would be temporary and in accordance with applicable standards and regulations. Therefore, no impact related to the handling of hazardous materials within one-quarter mile of a school would occur.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. Pursuant to Government Code Section 65962.5 (Cortese List) requirements, the State Water Resources Control Board (SWRCB) GeoTracker database (SWRCB 2021) and the California Department of Toxic Substances Control (DTSC) EnviroStor database (DTSC 2021) were searched for hazardous materials sites within the Project site. The Project site is not located within 1,000 feet of an active hazardous materials site according to these databases. Therefore, no impact related to hazardous materials sites is anticipated.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the Project site?

Less Than Significant Impact. The nearest airport to the Project site is the MARB/IPA, located approximately 1.5 miles to the northwest. The Perris Valley Airport-L65 is located approximately 5 miles south of the Project site. According to the ALUCP for the Perris Valley Airport, the Project site is not located within the Airport Influence Area Boundary (Riverside County Airport Land Use Commission 2011). However, the proposed Project is located within the 2014 Riverside County Airport Land Use Commission ALUCP for MARB/IPA, the 2018 AICUZ Study, and the City's AOZ. The Project site is within Zone B1/APZ II and Zone C1 per the ALUCP for MARB/IPA. Zone B1/APZ II is the inner approach/departure zone and encompasses areas of high noise and high accident potential risk within the inner portion of the runway approach and departure corridors. Although the City created an Airport Overlay Zone component to the City's land use planning to accommodate development consistent with the land use designations of the ALUCP for MARB/IPA, the Project was required to go through Airport Land Use Commission (ALUC) review and consistency determination because it requires legislative actions (i.e., the requested Specific Plan Amendment and Zoning Amendment).

The Project site is bisected by the two zoning designations from the northwestern to southeastern portion of the Project site. The northwestern, western, and southwestern portion of the Project site fall within Zone B1/APZ II. Approximately 279,313 sf of land area and 119,650 sf of building area are located within this zoning designation. This includes a portion of the trailer parking lot, Driveway 1 to Indian Avenue, Driveway 2 to Ramona Expressway, car parking, and approximately half of the warehouse building. The northern, northeastern, eastern, and southeastern portion of the Project site fall within Zone C1. Approximately 371,037 sf of land area and 118,237 sf of building area fall within this zoning designation. This includes the rest of the trailer parking lot, Driveway 3 to Perris Boulevard, car parking, the commercial area, and half of the warehouse building.

Within Zone C1, aircraft are generally greater than 2,000 feet above runway elevation on arrival and generally great than 3,000 feet above runway elevation on departure. Projects within this Zone would be located beneath or adjacent to low altitude overflight corridors, which has the potential to generate noise at a level that could be potentially disruptive. Noise impacts on the proposed Project are evaluated in Section XIII, Noise.

The MARB/IP ALUCP limits the total number of people permitted on a Project site at any time in APZ II areas. These limitations are as follows:

- Compatibility Zone B1/APZ II Criteria = Limited to an average of 50 people per acre
- Comply with the maximum 50 percent lot coverage per the applicable APZs
- Warehouse – 35% of the usage intensity from 1 person/500 sf
- Office – 1 person / 200 sf
- Single-acre Persons Limit = Limited 100 people in a single acre

The Riverside County ALUC found the Project to be consistent with the MARB/IPA ALUCP subject to conditions outlined in their letter dated April 14, 2022. These conditions include details such as the requirements for future review or studies based on changes to development plans and noticing requirements for aircraft noise. The applicant also agreed to a condition, which shall be recorded and the title of the property, to restrict occupancy to 50 people in any given acre in APZ-II. With adherence to these conditions, the Project would comply with the density requirements of the ALUCP.

The proposed industrial uses do not include any Prohibited Uses of the ALUC, such as children's schools, libraries, and day care centers, nor are they identified as other discouraged developments, such as above ground bulk storage of hazardous materials (i.e., gas stations). The future development of the commercial pad was not considered by the ALUC review. When a specific development is proposed for the commercial pad, it would be subject to the AOZ regulations and zoning restrictions. If it complies with these regulations, City staff could voluntarily provide the development plans to the ALUC for review. Given required compliance with specified land use and safety requirements and/or a consistency determination by the ALUC, impacts related to the commercial land use would be less than significant.

According to Exhibit MA-5 in the Background Data: March Air Reserve Base / Inland Port Airport and Environs, the Project site is within the FAR Part 77 Military Outer Horizontal Surface Limits. However, the Project would be below this surface; therefore, an obstruction evaluation in accordance with PVCCSP EIR mitigation measure MM Haz 6 is not required.

Part of the Project site is within the noise contours of 60 to 65 dBA CNEL for the MARB/IPA. The commercial pad where the hotel could be constructed is outside of the 60 dBA CNEL contour. These noise levels would be compatible with the proposed industrial, office, and hotel land uses. Noise impacts on the proposed Project are further evaluated in Section XIII, Noise.

Although impacts associated with aircraft activities would be less than significant, the proposed Project is required to comply with PVCCSP EIR mitigation measures MM Haz 2 through PVCCSP MM Haz 5 to reduce impacts associated with MARB/IPA operations. Therefore, hazards associated with aircraft operations would be less than significant and no Project-specific mitigation would be required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The City participates in the Riverside County Multiagency Multi-Hazard Functional Plan, which outlines requirements for emergency access and standards for emergency responses. Access to the Project site would be via Indian Avenue, North Perris Boulevard, and Ramona Expressway. Project related traffic would be minimal and would not cause a significant increase in congestion. During construction of the Project, heavy construction vehicles could interfere with emergency response to the site or emergency evacuation procedures in the event of an emergency (e.g., vehicles traveling behind the slow-moving truck). However, such delays would be brief and infrequent. Moreover, as required in the City's Municipal Code Section 10.12.100, no street shall be closed or partially obstructed, or detours established, without approval of the City's traffic engineer. As a result, the Project's impacts would be less than significant and no mitigation would be required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. According to the Safety Element of the City's General Plan, wildfires typically pose minimal threat to people and buildings in urban areas but increasing human encroachment into natural areas increases the likelihood of bodily harm or structural damage. This encroachment occurs in areas called the wildland-urban interface (WUI), which is considered an area within the high and very high fire hazard severity zone, as defined by Cal FIRE. The Safety Element Wildfire Hazards map shows that the Project site is not located in a Very High Fire Hazard Severity Zone (City of Perris 2022). Therefore, the proposed Project is not anticipated to expose people or structures to wildland fires. No impacts associated with wildland fires would occur and no mitigation would be required.

X. Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	■	☐

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	■	☐
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	i. Result in substantial erosion or siltation on- or off-site?	☐	☐	■	☐
	ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	■	☐
	iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?	☐	☐	■	☐
	iv. Impede or redirect flood flows?	☐	☐	■	☐
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	■	☐
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	■	☐

Applicable PVCCSP Standards and Guidelines

The PVCCSP includes Standards and Guidelines relevant to water quality and hydrology. These Standards and Guidelines are summarized below, are incorporated as part of the proposed Project, and are assumed in the analysis presented in this section. A preliminary drainage study, prepared by SD& H Associates (SD&H Associates 2021; Appendix H) provided information that is also incorporated into the below analysis.

On-Site Design Standards and Guidelines (Chapter 4.0 of the PVCCSP)

On-Site Standards and Guidelines

Properties within the PVCCSP shall be developed in general conformance with the Land Use Plan. Uses and development standards will be in accordance with the City of Perris Municipal Code Chapter 19 (Zoning/Land Use Ordinance) as amended by the PVCCSP zoning ordinance, and further defined by the Specific Plan objectives, design guidelines, as well as future detailed development proposals including subdivisions, development plans, and conditional use permits. If there are any conflicts between the Specific Plan and the City of Perris Municipal Code, the Specific Plan will supersede. If the Specific Plan is silent on particular subjects, the City shall refer to the Municipal Code for guidance. Except for the Specific Plan Development Standards/Design Guidelines adopted with the PVCCSP no portion of the

Specific Plan which purport or propose to change, waive, or modify any ordinance or other legal requirement for development shall be considered to be part of the adopted PVCCSP.

Development of properties governed by the PVCCSP area shall be in accordance with the mandatory requirements of all City of Perris ordinances, including state laws, and shall conform substantially to the PVCCSP, as filed in the office of the City of Perris Development Services Department, unless otherwise amended.

Water Quality Site Design

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

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

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

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

- Infiltration Basins
- Infiltration Trenches
- Permeable Pavement
- Harvest and Reuse
- Bioretention Facilities
- Extended Detention Basins
- Sand Filter Basins

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

- Optimize the Site Layout
- Preserve existing drainage patterns
- Protection of existing vegetation and sensitive areas
- Preserve natural infiltration capacity 90 Final Initial Study Minimize impervious area
- Disperse runoff to adjacent pervious areas
- Delineate drainage management areas
- Classify and Tabulate DMAs and determine runoff factors for
    - Self-treating areas
    - Self-retaining areas
    - Areas draining to self-retaining areas
    - Areas draining to BMPs Source Control

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

- Specify source control BMPs
- Identify pollutant sources
- Note locations on project-specific WQMP exhibit
- Prepare a table and narrative
- Identify operational source control BMPs BMP Features in “Visibility Zone”
- Treatment control BMPs adjacent to the public right-of-way must drain properly to adequate storm drain facilities. If no storm drain is available, alternative drainage shall be proposed for approval by City Engineer. Treatment control BMPs are not to be placed within public right-of-way.
- Open Jointed Surfaces for Sidewalks. Interlocking pavers, porous pavement and pervious concrete or other surfaces.
- Open Jointed Surfaces in Low Traffic Areas. Open jointed surfaces or porous concrete in low traffic areas of parking lots and for patios and sidewalks.
- Filter Strips. Vegetated areas consisting of grass turf or other low lying, thick vegetation intended to treat sheet flow from adjacent impervious areas shall be considered for use adjacent to parking lots, sidewalks, and roads. Filter Strip Adjoining Impervious Surfaces. Filter strips should adjoin impervious surfaces where feasible. Roof Runoff Discharge into Landscape Area.

- Discharge to landscaped areas adjacent to the buildings. Second Treatment of Roof Water. If roof runoff cannot be conveyed without mixing with on-site untreated runoff, the roof runoff will require a second treatment.

- Covered Trash Enclosures. Trash enclosures covers must be provided.

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

8.2.1.8 Water Quality Site Design Runoff from Loading Docks.

Runoff from loading docks must be treated for pollutants of concern prior to discharge from the site. Truck wells. Truck-wells are discouraged due to potential clogging of sump condition storm drain inlets. If used, run-off needs to run through landscape before discharging from site.

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. The Santa Ana Regional Water Quality Control Board sets water quality standards for all ground and surface waters within the Project's region. Water quality standards are defined under the Clean Water Act to include both the beneficial uses of specific water bodies and the levels of water quality that must be met and maintained to protect those water quality objectives. The proposed Project site is located within the Santa Ana Watershed and San Jacinto Sub-Watershed. Runoff from the PVCC area, including the Project site, discharges into the Perris Valley Storm Channel, which is tributary to the San Jacinto River, Canyon Lake, and Lake Elsinore.

Activities associated with the construction of the proposed Project would include grading, which may have the potential to release pollutants (e.g., oil from construction equipment, cleaning solvents, paint) and silt off-site which could impact water quality.

Potential water quality impacts associated with the proposed Project would be generally limited to short-term construction-related erosion and sedimentation. During operation, the discharge of minor amounts of fuels or other pollutants associated with automobiles into storm drains during rain events may occur. The Project would include construction of an underground stormwater basin and on-site storm drains in compliance with City design standards. Furthermore, the Project would prepare a WQMP to illustrate how low impact development Best Management Practices (BMPs) have been incorporated into Project construction and design. The WQMP would incorporate BMPs in accordance with the California Stormwater BMPs Handbook and the City's BMP Design Manual to control erosion and protect the quality of surface water runoff.

As required under the NPDES, a SWPPP would be created specifically for construction of the proposed Project. The plan would address erosion control measures that would be implemented to avoid or minimize erosion impacts to exposed soil associated with construction activities. The SWPPP would include a program of BMPs to provide erosion and sediment control and reduce potential impacts to water quality that may result from construction activities. BMPs would include providing gravel bags and silt fences where applicable. Through compliance with the regulatory requirements of the NPDES Statewide General Construction Permit and on-site drainage facilities, the Project is not expected to violate any water quality standards or waste discharge requirements during construction.

Development of the proposed Project would add impervious surfaces to the site through associated parking, loading areas, and drive aisles. By increasing the percentage of impervious surfaces on the site, less water would percolate into the ground and more surface runoff would be generated. Paved areas and streets would collect dust, soil and other impurities that would then assimilate into surface runoff during rainfall events. The Project would be required to comply with the NPDES permit and Waste Discharge Requirements for Riverside County, of which the City is a co-permittee. The City is responsible for discharges into its MS4 facilities to the extent of its legal authority and as required by federal regulations s (40 C.F.R. § 122.26(d)(2)(i)), the City shall control discharges of pollutants into the MS4 to the maximum extent practicable (MEP). Although not held liable for pollutants coming from outside sources, if the City authorizes the connection of other dischargers into their MS4 systems, the City is required by the Order to approve a written WQMP describing post-construction BMPs to control the discharges of pollutants into the MS4 to the MEP. The permittees are responsible for several plans to reduce pollutants in urban runoff, including a WQMP for certain new development and redevelopment projects. The proposed Project meets the threshold of a Priority Development Project since it involves more than 10,000 sf of impervious surface.

The proposed Project incorporates site design, source controls and treatment control BMPs to address storm water runoff. Thus, through the BMPs combined with compliance with existing regulations such as the implementation of the WQMP, the proposed Project would not violate water quality standards or waste discharge requirements. Therefore, impacts are less than significant and no mitigation would be required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The Project is located within the San Jacinto Groundwater Basin, which underlies the valleys of San Jacinto, Perris, Moreno Valley, and Menifee in western Riverside County. Natural recharge to the San Jacinto groundwater basin is primarily from percolation of flows into the San Jacinto River and its tributary streams, with percolation of water stored in Lake Perris as an additional source of recharge.

While the majority of the site would become impermeable after development, Project design features and BMPs such as the use of impervious or semi-pervious materials and the use of landscaping would facilitate some groundwater recharge and percolation. In addition, due to the proposed Project's small size in relationship to the total size of the San Jacinto Groundwater Basin (approximately 188,000 acres) and implementation of BMPs to be identified in the Project's WQMP, there would not be a substantial effect upon groundwater recharge within the groundwater basin. Furthermore, the Project would rely on domestic water supply and would not require the use of groundwater sources and would not substantially deplete groundwater supplies. Therefore, impacts would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- Result in substantial erosion or siltation on- or off-site, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?

Less Than Significant Impact. There are no streams or rivers currently mapped at the Project site. Based on review of historic aerials, drainage on the Project appears to flow from northwest to southeast. According to the Preliminary Drainage Study, Project site runoff drains in a southeasterly direction in a sheet flow manner to a low point located near the southeast corner of the Project. When the capacity of the lump sum is exceeded, the excess flows generally spills into an existing channel/swale located along the southerly edge of the Project (within the City of Perris right-of-way) and this existing concrete channel drains into an existing downstream storm drain system located downstream (northeast of the intersection of Ramona Expressway and Perris Boulevard. Runoff from the remaining portion of the Project (near the northeasterly area) drains toward Perris Boulevard. via surface flow to an existing catch basin near the intersection of Ramona Expressway and Perris Boulevard. The runoff gets conveyed via an existing storm drain system and outlets into the same downstream earthen channel located northeast of the intersection of Ramona Expressway and Perris Boulevard. This earth channel also receives flows from an existing Perris Valley MDP Lateral Line E-11. From this point, runoff is conveyed via the existing channel in an easterly direction for approximately 0.74 mile until discharging into the existing Riverside County Flood Control District's Perris Valley Storm Drain Channel.

Runoff from the proposed Project will be collected via an underground water quality/treatment and storage basin and conveyed via on-site private storm drainpipes to an off-site flood control detention basin for treatment and flood control mitigation purposes. The Project also plans to construct a 30-inch diameter lateral pipe that can connect into the existing Perris Valley MDP Lateral Line E-11 in Perris Boulevard. and the outlet pipe from the proposed on-site BMP will connect into the lateral pipe. As indicated above, the runoff in the Perris Valley MDP Lateral Line E-11 will discharge into the same existing earthen channel located downstream at the northeast of the intersection Roman Expressway and Perris Boulevard. Since the on-site runoff that used to drain to the southeasterly corner of the Project in the existing condition will now be directed off-site (around the existing business) to a flood control detention basin, the Project will reduce (or possibly eliminate) the on-site flows that is getting to the existing concrete channel (within the City right-of-way, north of Ramona Expressway) and help improve the existing channel capacity situation.

Therefore, the proposed Project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation onsite or offsite. Thus, impacts would be less than significant and no mitigation would be required.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. According to the Safety Element of the City General Plan, the Project site is not located within a Special Flood Hazard Area Inundated by 100-Year Flood Zone. However, the Project

site is within the Dam Inundation Area for the Lake Perris Dam (City of Perris 2022). The Department of Water Resources (DWR) has developed The Perris Dam Modernization Project, which is intended to make the dam more seismically resilient. The final phase is the construction of an Emergency Release Facility, which will allow for the safe drawdown of lake water surface levels following a seismic event. This final phase of the project is scheduled to begin construction in 2022 (City of Perris 2022). Therefore, due to the unlikely event of a dam failure and through compliance with all applicable policies contained in the City's General Plan, impacts related to dam inundation are less than significant.

Additionally, the FEMA Flood Map Service Center identifies the Project site as not being mapped within a special flood hazard area (FEMA 2008). Therefore, impacts related to flood hazards would not occur. Tsunamis are usually caused by displacement of the ocean flood causing large waves and are typically generated by seismic activity. The proposed Project is located approximately 34 miles from the Pacific Ocean; therefore, risks from a tsunami are not present for the Project site. A seiche is a standing wave in an enclosed or partly enclosed body of water. Seiches are normally caused by earthquake activity, and can affect harbors, bays, lakes, rivers, and canals. The nearest body of water, Perris Reservoir, is approximately 2 miles away, which is too far to present impacts by a seiche event. Impacts relating to the release of pollutants due to tsunamis or seiches event would not occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. Implementation of the Project would not have a substantial effect on groundwater recharge within the overlapping Perris North Groundwater Management Zone of the West San Jacinto Groundwater Sub-basin. Under the Sustainable Groundwater Management Act (SGMA) passed in 2014 (California Water Code Section 10729[d]), each high and medium priority basin, as identified by the DWR, is required to have a Groundwater Sustainability Agency (GSA) that will be responsible for groundwater management and development of a Groundwater Sustainability Plan (GSP) (DWR 2020a).

The San Jacinto Groundwater Basin is a high priority basin (DWR 2019). The Eastern Municipal Water District (EMWD) Board of Directors is the GSA for the West San Jacinto Groundwater Sub-basin and is responsible for development and implementation of a GSP. The EMWD Board of Directors is required to develop a GSP by 2022 and implement the GSP by 2042. A draft GSP was prepared in April 2021. The final GSP will document the basin conditions and basin management will be based on measurable objectives and minimum thresholds defined to prevent significant and unreasonable impacts to the sustainability indicators defined in the GSP. While the GSP has not been approved for the basin yet, the Project would not conflict with the plan because groundwater would not be used to serve the Project. The Project would be supplied with imported, potable water and recycled water for non-potable water demands and the Project site is not within a groundwater recharge area. Therefore, the Project does not have the potential to conflict or obstruct implementation of a sustainable groundwater management plan and impacts would be less than significant and no mitigation would be required.

XI. Land Use and Planning

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

Applicable PVCCSP Standards and Guidelines

Land Use Plan (Chapter 2.0, PVCCSP)

2.1 Perris Valley Commerce Center Land Use Designations

2.1.1 Industrial Uses

Light Industrial (LI): This zone provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials and retail related to manufacturing. This zone correlates with the 'Light Industrial' General Plan Land Use designation.

2.1.6 Airport Overly Zone

The Airport Overlay Zone extends from the south end of the runway at March Field, through the central part of the PVCCSP, terminating in the area adjacent to the Rider Street/Perris Boulevard intersection. It is comprised of three distinct areas with specific land uses and land use densities within their respective category. These three areas correspond to the Airport Safety Zones, as established by the 2018 AICUZ Study.

Accident Potential Zone II (APZ-II): This zone prohibits many uses that involve hazardous materials (such as gas stations), and those uses that have higher densities of people per acre. Non-residential development will be limited to those uses that have not more than 50 persons per acre at any time, including hotels and motels. This zone prohibits new residential development, schools, or churches.

a) Physically divide an established community?

No Impact. The Project would develop an existing vacant lot and does not propose any features that would physically divide an established community. Therefore, no impact would occur.

b) Cause significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The proposed Project site is located within the City and within the PVCCSP area. Thus, land use is guided by both the Perris General Plan and the PVCCSP. The proposed Project includes a warehouse building, a construction of a portion of Line E storm drain, and a future commercial development. While the future commercial use located on the 1.61-acre commercial pad is consistent with the PVCCSP Commercial (C) land use designation, the proposed amendment to the PVCCSP would replace the existing Commercial land use and zoning designation on the remainder of the Project site with a Light Industrial land use and zoning designation on approximately 13 acres.

The consistency of the Project with the applicable policies from the City of Perris General Plan that have been adopted for the purpose of avoiding or mitigating an environmental effect is evaluated in Table 12. As shown, the Project would be consistent with the policies of the City's General Plan.

Table 12
GENERAL PLAN CONSISTENCY ANALYSIS

Policy No.	Policy	Statement of Consistency
Land Use Element		
Policy II.A	Require new development to pay its full, fair share of infrastructure costs.	The Project applicant will pay applicable development impact fees (DIFs) pursuant to City Ordinance No. 1182 to mitigate the cost of public facilities to support new development. Thus, the Project is consistent with Land Use Policy II.A.
Policy II.B	Require new development to include school facilities or pay school impact fees, where appropriate.	The Project applicant would be required to pay school impact fees, as set by the Val Verde Unified School District. Effective May 4, 2020, the fee would be $0.66 per assessed square foot of constructed commercial or industrial space. Therefore, the Project is consistent with Land Use Policy II.B.
Policy III.A	Accommodate diversity in the local economy.	The warehouse building of the proposed Project is not consistent with the existing Commercial (C) land use designation for the Project site. However, the proposed amendment to the PVCCSP would replace the existing Commercial land use and zoning designation with a Light Industrial (LI) land use and zoning designation for approximately 13 acres. The PVCCSP was adopted by the City to ensure quality, organized development within the Project area vicinity. While development of the Project would change the Project site's designation, it would be consistent with the surrounding land uses. Specifically, surrounding properties include undeveloped areas, and commercial development followed by industrial development to the north; a gas station and a car wash adjacent to and southeast of the

Policy No.	Policy	Statement of Consistency
		Project site; undeveloped areas and commercial development to the east; and undeveloped areas followed by industrial development to the south and west. The Project would assist the City in achieving its goal of building out the PVCCSP planning area and generating revenue and land use diversity for the local economy. Therefore, the proposed Project is consistent with Land Use Policy III.A.
Policy V.A	Restrict development in areas at risk of damage due to disasters.	The proposed Project site is not located within an area of significant risk due to human or natural disasters; therefore, although it would be the responsibility of the City to determine whether development restrictions should be in place, the Project is consistent with Land Use Policy V.A.
Circulation Element		
Policy II.B	Maintain the existing transportation network while providing for future expansion and improvement based on travel demand, and the development of alternative travel modes.	The proposed Project would not significantly impact the existing transportation network upon implementation of the mitigation measures identified below in Section XVII. PVCCSP EIR mitigation measures would be implemented along with the proposed circulation improvements. Additionally, the Project applicant would participate in payment of the Project's fair share of traffic mitigation fees. Further, installation of sidewalks and bike racks at the Project site would support alternative travel modes such that the Project is consistent with Circulation Policy II.B.
Policy III.A	Implement a transportation system that accommodates and is integrated with new and existing development and is consistent with financing capabilities.	The Project applicant proposes transportation improvements consistent with the increased trips that would be related to the proposed development. The applicant would be responsible for financing the proposed improvements. Therefore, the Project is consistent with Circulation Policy III.A
Policy V.A	Provide for safe movement of goods along the street and highway system.	The Project would be located adjacent to a designated truck route (Indian Avenue) and would only provide truck ingress/egress to this road. These routes allow for the movement of goods without compromising the circulation or safety of local roads. The Project would be consistent with Circulation Policy V.A.

Policy No.	Policy	Statement of Consistency
Conservation Element		
Policy II.A	Comply with state and federal regulations to ensure protection and preservation of significant biological resources.	The proposed Project would be consistent with the Multiple Species Habitat Conservation Plan (MSHCP) upon implementation of the mitigation measures identified in Section IV, Biological Resources. Furthermore, the Project applicant would pay applicable fees pursuant to City's Ordinance No. 1123 to offset incremental impacts to biological resources from Project construction and operation. Therefore, the Project is consistent with Conservation Policy II.A.
Policy III.A	Review all public and private development and construction projects and any other land use plans or activities within the MSHCP area, in accordance with the conservation criteria procedures and mitigation requirements set forth in the MSHCP.	The Project site is located within the Mead Valley Area Plan of the Western Riverside MSHCP. The Project is not within a MSHCP Criteria Cell or Conservation Area. In accordance with the MSHCP, the proposed Project was reviewed for consistency with the MSHCP in Section IV, Biological Resources, and the Project's GBRA-MSHCP, located in Appendix C. The Project would be consistent with the requirements and mitigation set forth in the MSHCP and Conservation Policy III.A.
Policy IV.A	Comply with State and Federal regulations and ensure preservation of the significant historical, archaeological, and paleontological resources.	As detailed in Sections V, Cultural Resources and VII, Geology and Soils, the Project would comply with applicable regulations and implement mitigation measures to ensure preservation of significant historical, archaeological, and paleontological resources. Therefore, the Project is consistent with Conservation Policy IV.A.
Policy V.A	Coordinate land-planning efforts with local water purveyors.	The EMWD is the local water purveyor and has been involved with utility planning for the proposed land uses at the Project site. Water-related improvements are detailed in Section 1.5, Project Components. The Project is consistent with Conservation Policy V.A.
Policy VI.A	Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).	As required under the NPDES, a SWPPP would be created for construction of the proposed Project. The Project would also be required to comply with the NPDES permit and Waste Discharge Requirements for Riverside County during operation. The Project would be consistent with Conservation Policy VI.A
Policy VIII.A	Adopt and maintain development regulations that encourage water and resource conservation.	The Project would be subject to local development regulations designed to encourage water and resource conservation. For example, proposed plant materials would have either low or moderate water needs. The Project would therefore be consistent with Conservation Policy VIII.A.

Policy No.	Policy	Statement of Consistency
Policy VIII.B	Adopt and maintain development regulations that encourage recycling and reduced waste generation by construction projects.	The proposed Project would be required to comply with applicable local, State, and federal solid waste management regulations. For example, the Project must develop a collection program for recyclables and comply with practices enacted by the City under the California Integrated Waste Management Act of 1989 (AB 939). The Project would be consistent with Conservation Policy VIII.B.
Noise Element		
Policy I.A	The State of California Noise/Land Use Compatibility Criteria shall be use in determining land use compatibility for new development.	These criteria, as adopted by the City's General Plan Noise element, were used in the Project's noise study (Appendix I) to evaluate land use compatibility related to the Project. The proposed uses are compatible with existing noise. Therefore, the Project is consistent with Noise Policy I.A.
Policy V.A	New large scale commercial or industrial facilities located within 160 feet of sensitive land uses shall mitigate noise impacts to attain an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria.	As the Project proposes an industrial land use within 160 feet of a sensitive land use (a residence), the Project's Acoustical Analysis (Appendix I) considered whether the Project would generate noise in excess of 60 CNEL, at the nearby residence. Operation of the warehouse would not exceed this threshold. When precise plans for the commercial pad and hotel become available, an acoustical analysis would be required to demonstrate compliance with this policy. The Project would comply with Noise Policy V.A.
Safety Element		
Policy S-2.1	Require road upgrades as part of new developments/major remodels to ensure adequate evacuation and emergency vehicle access. Limit improvements for existing building sites to property frontages.	The Project applicant proposes multiple road upgrades to accommodate the three Project driveways. Stop controls would be installed and intersections would be constructed in accordance with the specifications of the Project's traffic analysis included as Appendix J. The Project would be consistent with Safety Policy S-2.1.
Policy S-2.2	Require new development or major remodels include backbone infrastructure master plans substantially consistent with the provisions of "Infrastructure Concept Plans" in the Land Use Element.	The Project includes proposed vehicular access improvements and stormwater infrastructure consistent with the provisions contained in the Land Use Element, including Safety Policy S-2.2.

Policy No.	Policy	Statement of Consistency
Policy S-2.5	Require all new developments, redevelopments, and major remodels to provide adequate ingress/egress, including at least two points of access for sites, neighborhoods, and/or subdivisions.	The Project would include three driveways, with two dedicated to passenger vehicles and one dedicated to trucks. Based on the Project's traffic study (Appendix J), these driveways and associated roadway improvements would provide adequate ingress/egress. The Project is consistent with Safety Policy S-2.5.
Policy S-4.1	Restrict future development in areas of high flood hazard potential until it can be shown that risk is or can be mitigated.	The Project is not located in an area of high flood hazard according to the Safety Element. Therefore, the Project is consistent with Safety Policy S-4.1
Policy S-4.3	Require new development projects and major remodels to control stormwater run- off on site.	An underground water quality treatment and storage basin would capture storm flows that could otherwise be directed and erode loose soils across the site. The Project's WQMP and SWPPP must be approved by the City Engineer prior to the issuance of grading permits. Therefore, the Project is consistent with Safety Policy S-4.3.
Policy S-4.4	Require flood mitigation plans for all proposed projects in the 100-year floodplain (Flood Zone A and Flood Zone AE).	The Project site is not within the 100-year floodplain and therefore is consistent with Safety Policy S-4.4.
Policy S-4.5	Ensure areas downstream of dams within the City are aware of the hazard potential and educated on the necessary steps to prepare and respond to these risks.	The applicant is aware of the Project's location in the Dam Inundation Zone identified in the Safety Element. Due to the dam's upgrades a flooding event is unlikely to occur. The Project is consistent with Safety Policy S-4.5.
Policy S-5.3	Promote new development and redevelopment in areas of the City outside the VHFHSZ and allow for the transfer of development rights into lower-risk areas, if feasible.	The site is outside of the Very High Fire Hazard Severity Zone (VHFHSZ) and therefore in a low-risk area. No transfer of development rights would be necessary to decrease fire risk but the proposed development would keep development outside of the VHFHSZ. The Project is consistent with Safety Policy S-5.3.
Policy S-5.6	All developments throughout the City Zones are required to provide adequate circulation capacity, including connections to at least two roadways for evacuation.	The Project would provide adequate circulation capacity and would include connections to all three of the roadways adjacent to the Project site. The Project is therefore consistent with Safety Policy S-5.6.
Policy S-5.10	Ensure that existing and new developments have adequate water supplies and conveyance capacity to meet daily demands and firefighting requirements.	Project utilities have been designed to ensure the development has adequate supplies for both daily demands and firefighting requirements in compliance with Safety Policy S-5.10.

Policy No.	Policy	Statement of Consistency
Policy S-6.1	Ensure new development and redevelopments comply with the development requirements of the AICUZ Land Use Compatibility Guidelines and ALUP Airport Influence Area for March Air Reserve Base.	The Project required review by the Riverside County ALUC to ensure consistency with the applicable plans and development requirements related to the MARB/IPA. The ALUC reviewed the Project and found it consistent with the applicable policies. Therefore, the Project is consistent with Safety Policy S-6.1.
Policy S-6.2	Effectively coordinate with March Air Reserve Base, Perris Valley Airport, and the March Inland Port Airport Authority on development within its influence areas.	As stated above, the Project applicant has coordinated with the Riverside County ALUC, which issued a requirement for the applicant to record an aviation easement to the March Inland Port Airport Authority. The March Inland Port Airport Authority was also notified of the ALUC review. The Project is consistent with Safety Policy S-6.2.
Policy S-6.3	Effectively coordinate with March Air Reserve Base and Perris Valley Airport on development within its influence areas.	As stated above, the Project applicant has coordinated with the applicable ALUC and Airport Authority regarding the Project and is therefore consistent with Safety Policy S-6.3.
Policy S-7.1	Require all development to provide adequate protection from damage associated with seismic incidents.	Engineering and construction of the Project would be required to be in conformance with the ICC, IBC, CBC, and other applicable standards to protect from seismically induced damage. Based on the Project's distance from active faults and other geologic characteristics, there are minimal seismic risks associated with the Project site. The Project is consistent with Safety Policy S-7.1.
Policy S-7.2	Require geological and geotechnical investigations by State-licensed professionals in areas with potential for seismic and geologic hazards as part of the environmental and development review and approval process.	A Geotechnical Engineering Investigation was prepared by NORCAL Engineering and a registered engineer. The report is attached to this IS/MND as Appendix E. The Project is consistent with Safety Policy S-7.2.
Healthy Community Element		
Policy HC 1.3	Improve safety and the perception of safety by requiring adequate lighting, street visibility, and defensible space.	Proposed lighting is anticipated to include a combination of operational, street, and security lighting on the building's exterior and in parking areas that would conform to the Title 24 and City standards that regulate outdoor lighting. The transportation analysis provided design requirements for safe circulation. The Project is not in a VHFHSZ and does not have adjacent wildlands that require excess defensible space. No landscaping would be installed which would exacerbate fire risks. The Project would comply with Policy HC 1.3.

Policy No.	Policy	Statement of Consistency
Policy HC 6.3	Promote measures that will be effective in reducing emissions during construction activities • Perris will ensure that construction activities follow existing South Coast Air Quality Management District (SCAQMD) rules and regulations • All construction equipment for public and private projects will also comply with California Air Resources Board's vehicle standards. For projects that may exceed daily construction emissions established by the SCAQMD, Best Available Control Measures will be incorporated to reduce construction emissions to below daily emission standards established by the SCAQMD • Project proponents will be required to prepare and implement a Construction Management Plan which will include Best Available Control Measures among others. Appropriate control measures will be determined on a project by project basis, and should be specific to the pollutant for which the daily threshold is exceeded	Construction activities would follow SCAQMD and CARB rules and regulations and would not generate a significant impact. As there are no pollutants for which the Project's construction activities would exceed daily thresholds, the applicant would not be required to submit a Construction Management Plan that includes Best Available Control Measures and other applicable measures. The Project would implement the applicable PVCCSP EIR mitigation measures and would comply with Policy HC 6.3.

Policy No.	Policy	Statement of Consistency
Environmental Justice Element		
Goal 3.1 Policy	Continue to ensure new development is compatible with the surrounding uses by co-locating compatible uses and using physical barriers, geographic features, roadways, or other infrastructure to separate less compatible uses. When this is not possible, impacts may be mitigated using: noise barriers, building insulation, sound buffers, traffic diversion.	The proposed Project is consistent with surrounding commercial and industrial land uses. The residential land uses are non-conforming but would be separated from the proposed Project by a 13-foot noise barrier to achieve acceptable noise levels. The Project is consistent with this Environmental Justice policy.
Goal 3.1 Policy	Support identification, clean-up, and remediation of local toxic sites through the development review process.	A Phase I ESA was completed for the project and is attached to this IS/MND as Appendix G. No Recognized Environmental Conditions were documented or identified in the Phase 1 ESA related to potentially hazardous materials. The Project is consistent with this Environmental Justice policy.
Goal 3.1 Policy	Encourage smoke-free/vape-free workplaces, multi-family housing, parks, and other outdoor gathering places to reduce exposure to second-hand smoke. As part of the development review process, require conditions that promote Good Neighbor Policies for Industrial Development for industrial buildings larger than 100,000 square feet. The conditions shall be aimed at protecting nearby homes, churches, parks, day-care centers, schools, and nursing homes from air pollution, noise lighting, and traffic associated with large warehouses, making them a "good neighbor."	The City has not adopted official Good Neighbor Policies for development projects. However, the Project would not result in significant impacts related to the identified issues. The Project would not generate unacceptable noise at the nearby residence. Traffic improvements would be constructed by the Project. Further, the Project would conform with policies to prevent light and air pollution. The Project would be consistent with this Environmental Justice Policy.
Goal 5.1 Policy	Require developers to provide pedestrian and bike friendly infrastructure in alignment with the vision set in the City's Active Transportation Plan or active transportation in-lieu fee to fund active mobility projects.	The Rider Street Bike Trail would be accessible from the Project site and bike stalls would be installed around the primary office area and main entrances. Crosswalks would be installed for safety at intersections. The development fee action (A4.5) of the City's Active Transportation Plan has not yet been reflected in the development fee schedule. The Project is consistent with this Environmental Justice policy.

According to data presented in the SCAG's Employment Density Summary Report, average employment densities for commercial uses in the region range from a high of 175.49 employees per acre (high-rise office) to a low of 19.71 employees per acre (regional retail). Average employment densities for light industrial uses are 17.83 employees per acre for light manufacturing and 11.4 employees per acre for warehouse (SCAG 2001). Therefore, changing the land use designation from Commercial to Light Industrial would not result in additional employment growth beyond what would have been assumed for the development of the Commercial land use. Forecasts from the Connect SoCal Plan project an increase of 10,300 employees between 2016 and 2045 in the City. The Project therefore is consistent with SCAG's Connect SoCal forecasts.

The Connect SoCal 2020-2045 RTP/SCS (2020) contains ten regional goals that provide guidance for considering projects based on SCAG's long-range planning strategies. Table 13 provides analysis of the consistency of the Project with the policies from the Connect SoCal Plan. As shown, the proposed Project would achieve the goals of the Connect SoCal Plan.

Table 13
SCAG CONNECT SOCAL GOALS AND PROJECT CONSISTENCY

SCAG Goals	Statement of Consistency
Goal 1: Encourage regional economic prosperity and global competitiveness.	The introduction of the warehouse and future commercial development would provide jobs in a housing-rich area with limited job opportunities.
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	Roadway improvements are a component of the proposed Project that would improve vehicular circulation. The Rider Street Bike Trail would be accessible from the Project site and bicycle parking would be provided at the site. Pedestrian safety would be established through the separation of truck areas from passenger areas. Goods distribution would be improved by the availability of the warehouse nearby the existing truck route. The Project would be consistent with Goal 2.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.	See analysis of Goal 2. The Project would provide roadway improvements on the three roadways surrounding the Project site and would be consistent with Goal 3.
Goal 4: Increase person and goods movement and travel choices within the transportation system.	The development would provide a warehouse near the existing truck route, which would increase goods movement choices. The Project would be consistent with Goal 4.
Goal 5: Reduce greenhouse gas emissions and improve air quality.	The Project would be constructed in accordance with the energy-efficiency standards, water reduction goals, and other standards required by the 2019 Title 24 Standards and CALGreen Building Standards. In addition, the Project would implement measures from the City's CAP such as bicycle parking, sidewalks, and transit demand management. The Project would be consistent with Goal 5.
Goal 6: Support healthy and equitable communities.	The Project would provide a variety of job opportunities within the local economy to support a more equitable community. The increase in jobs would reduce long commutes from home to work. The Project would be consistent with Goal 6.

SCAG Goals	Statement of Consistency
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.	The Project would provide a warehouse in close proximity to an existing truck route, which can provide distribution within the region. The Project would be consistent with Goal 7.
Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	The Project would be required to comply with SCAQMD Rule 2305, which applies to new warehouses greater than 100,000 sf. The rule aims to facilitate emission reductions associated with warehouses and their mobile sources. The Project owner and future tenants would continue to be responsible for compliance with evolving regulations related to emissions and efficiency. The Project would be consistent with Goal 8.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	The Project does not propose any residential uses; therefore, Goal 9 is not applicable to the proposed Project.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats.	The Project site does not contain agricultural lands. Impacts to waters of the State would be mitigated at a 2:1 ratio through the purchase of credits and the Project applicant would pay the LDMF in compliance with the MSCHP. Therefore, the Project would be consistent with Goal 10.

Impacts associated with conflicts with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant and no mitigation would be required.

XII. Mineral Resources

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

Applicable PVCCSP Standards and Guidelines

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

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The CDC classifies the availability of mineral resources in a region into four mineral resource zone (MRZ) categories: MRZ 1 for no mineral resources, MRZ 2 for significant resources areas with the quality and quantity known, MRZ 3 for significant resource areas with the quality and quantity unknown,

and MRZ 4 for areas with no information. According to the City's General Plan, the CDC is primarily interested in the preservation of significant resources in MRZ 2 regions. The land within the City, including the Project site, is classified as MRZ 3 and MRZ 4, which are not considered to be significant resource areas (City of Perris 2005). Implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impacts to mineral resources would occur.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. As stated above in question a), the City's General Plan does not consider the Project site to be a significant mineral resource area. Additionally, the Project site is not used for mineral extraction and is not known as a locally important mineral resource recovery site. Further, the Project site is not delineated on any plan for mineral resource recovery uses. No impacts to mineral resource availability would occur.

XIII. Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	■	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	■	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	■	☐

An Acoustical Analysis Report prepared by HELIX (HELIX 2022e) for the proposed project is attached to this IS/MND as Appendix I. Its findings and recommendations are incorporated into the following analysis.

Applicable PVCCSP Standards and Guidelines

The PVCCSP Standards and Guidelines relevant to the analysis of noise impacts presented in this IS/MND and summarized below are incorporated as part of the proposed Project and assumed in the analysis presented in this section.

The PVCCSP EIR mitigation measures that are applicable to the proposed Project are incorporated in the following analysis.

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

MM Noise 2 During construction, stationary construction equipment, stockpiling and vehicle staging areas will be placed a minimum of 446 feet away from the closet sensitive receptor.

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

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

MM Noise 5 New sensitive land uses, including residential dwellings, mobile homes, hotels, motels, hospitals, nursing homes, education facilities, and libraries, to be located within the PVCC shall be protected from excessive noise, including existing and projected noise. Attenuation shall be provided to ensure that noise levels do not exceed an exterior standard of 60 dBA (65 dBA is conditionally acceptable) in outdoor living areas and an interior standard of 45 dBA in all habitable rooms. Specifically, special consideration shall be given to land uses abutting Ramona Expressway from Redlands Avenue to Evans Road and from Evans Road to Bradley Road; Rider Street from Evans Road to Bradley Road; Placentia Avenue from Perris Boulevard to Redlands Avenue, from Redlands Avenue to Wilson Avenue, from Wilson Avenue to Murrieta Road, and from Murrieta Road to Evans Road. Perris Boulevard from Orange Avenue to Placentia Avenue and from San Michele Road to Krameria Avenue; and Redlands Avenue from Nuevo Road to Citrus Avenue, from Citrus Avenue to Orange Avenue and from Orange Avenue to Placentia Avenue.

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant with Mitigation Incorporated.

Temporary Increase in Ambient Noise Levels (Construction)

The Project would generate temporary increases in noise during its construction. Construction of the project would require site clearing, grading, installation of underground utilities/infrastructure, construction of new buildings, paving, and architectural coating. The magnitude of the noise impact would depend on the type of construction activity, equipment, duration of each construction phase, distance between the noise source and receiver, and any intervening structures. Construction would

generate elevated noise levels that may disrupt the nearby non-conforming residence to the north. Construction equipment would be continuously moving across the site, and equipment is not anticipated to be located at a single location during a typical workday. The Project's noise study therefore modeled construction equipment at an average distance of 100 feet from the nearest non-conforming residence to the north of the Project.

The City's Municipal Code restricts construction to the hours of 7:00 am and 7:00 pm or on Sundays or applicable holidays. Additionally, construction noise would be significant if it exceeds a maximum level (L_{MAX}) of 80 A-weighted decibels (dBA). The Project would comply with the Municipal Code restrictions on construction hours, and the loudest construction equipment (an excavator, loader, and dump truck used together) would generate noise levels of 74.7 dBA L_{MAX} at 100 feet, below the 80 dBA L_{MAX} requirement.

During the grading period, there would be an average of 22 hourly haul truck passes for each of the 21 days of grading work. The segment of Indian Avenue nearest the residence carries 4,850 vehicle trips per day. An additional 22 trips per hour would temporarily increase the hourly noise level along that roadway from 58.7 dBA to 59.9 dBA. This would not exceed the 80 dBA L_{MAX} limits set by the Municipal Code. Although traffic noise levels would increase temporarily during the 21-day grading phase, impacts would be less than significant.

Although impacts from construction noise would be less than significant, the project would be required to comply with PVCCSP EIR mitigation measures MM Noise 1 through MM Noise 4, which further limit noise generated by construction equipment.

Permanent Increase in Ambient Noise Levels (Warehouse Operation)

The Project's proposed loading dock area, HVAC units, trash compactor, and increase in traffic would generate elevated noise levels compared to existing conditions. The nearest noise-sensitive land uses to these operations is the nonconforming residence to the north of the Project. The Project's primary operational noise sources would be located within the delivery area, the northern portion of which is adjacent to the Project boundary. Truck deliveries may take place within 130 feet of the Project boundary, and trailer parking may take place at closer distances. Delivery trucks were assumed to involve diesel-powered heavy trucks, with seven truck trips during the peak hour entering and exiting the site (Urban Crossroads 2022). Because the exact schedule and docking locations for a given day cannot be determined, it is conservatively assumed that three individual trucks each hour would be attempting to use the loading docks within the Project's northwestern corner closest to the off-site nonconforming residence. Noise sources associated with the delivery trucks would include the truck's diesel engine and backup alarm.

Per the City General Plan Noise Element, impacts would be significant if a commercial or industrial Project is located within 160 feet of a sensitive land use and the noise levels generated by the Project would exceed the CNEL of 60 dBA at the sensitive land use. Modeling of the Project's deliveries and stationary equipment indicated that noise levels at the nonconforming residence to the north would be up to 51.9 dBA CNEL, which would not exceed the 60 dBA CNEL limit. Operational noise impacts related to the warehouse use would be less than significant.

Permanent Increase in Ambient Noise Levels (Hotel Use)

As the exact site layout and design of the hotel use are unknown, its noise sources are not specifically known. A hotel's noise sources are anticipated to include HVAC units for heating and cooling of the hotel's rooms and common spaces. Because the exact location, size, and noise output of the future HVAC system is not known, impacts from noise generated by the hotel component of the Project are conservatively assessed as significant. Project mitigation measure NOI-1 would be required to ensure that noise levels from the hotel are reduced to a less than significant level.

Permanent Increase in Ambient Noise Levels (Traffic)

The Project would generate vehicular traffic along nearby roadways. Project traffic utilizing Indian Avenue would have the highest potential to result in increased noise levels due to the number of delivery trucks and the existing low traffic levels as compared to Ramona Expressway and Perris Boulevard. Modeling of traffic conditions was used to calculate the noise contour distances for Indian Avenue under existing conditions and post-Project conditions. The off-site roadway modeling represents a conservative analysis that does not consider topography or attenuation provided by existing structures. Traffic noise levels presented in this analysis are based on traffic volumes provided in the Project's traffic study (Urban Crossroads 2022).

As described in the SVCCSP EIR, impacts would be significant when existing noise levels are less than 60 dBA CNEL and the Project generates an increase in noise levels by 5 dBA CNEL or more. As measured at the nearby nonconforming residence just north of the Project, noise levels generated by Indian Avenue from Project traffic were modeled levels to increase by 1 dBA CNEL when compared to existing conditions. This increase would not be a perceptible increase and noise impacts from Project-generated traffic would be less than significant. Project traffic for other roadways in the Project vicinity would be less than those analyzed for this segment of Indian Avenue and would be on roadways with higher existing volumes. Therefore, noise increases from Project traffic on all nearby roadways would be less than significant.

Project Mitigation Measures

MM Noise 1 Noise levels from operational noise generated by the project's hotel component shall not exceed 60 dBA CNEL when measured at nearby sensitive land uses (including residences). When plans for the hotel component become available, an acoustic analysis shall be performed for the hotel's operational noise sources. This includes, but is not limited to, HVAC units and emergency generators. If the analysis determines that noise levels would exceed noise limits, noise reduction measures will be implemented as part of the hotel design. These noise reduction measures may include architectural parapets, or on-site sound barriers (wall).

If a barrier is used to shield noise for nearby NSLUs, it shall be located between the noise source and noise-sensitive receptor. The barrier must be solid. It can be constructed of masonry, wood, plastic, fiberglass, steel, or a combination of those materials, as long as there are no cracks or gaps, through or below the wall. Any seams or cracks must be filled or caulked. If wood is used, it can be tongue and groove and must be at least one-inch total thickness or have a density of at least 3½ pounds per square foot. The barrier must be an adequate height to break the line-of-sight between the noise source and receptor.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be conducted by the Project. A possible source of vibration during general Project construction activities would be a vibratory roller used for gravel or pavement compaction. A vibratory roller could be used up to 100 feet from the closest off-site structure (gas station to the east). A vibratory roller would create approximately 0.210 inch per second PPV at 25 feet (Caltrans 2013b). A 0.210 inch per second PPV vibration level would equal 0.046 inch per second PPV at a distance of 100 feet.[2] This would be lower than what is considered a "strongly perceptible" level for humans of 0.1 inches per second PPV, and lower than the structural damage threshold of 0.5 inches per second PPV for continuous/frequent intermittent construction sources. Therefore, although a vibratory roller may be perceptible to nearby human receptors, temporary impacts associated with the roller (and other potential equipment) would be less than significant and no mitigation would be required.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less Than Significant with Mitigation Incorporated. As noted under question e) in Section IX, the nearest airports to the proposed Project site are MARB/IPA and the Perris Valley Airport. According to the ALUCP for Perris Valley Airport, the Project site is not located within the Airport Influence Area Boundary (Riverside County 2010). However, the proposed Project is located within the limits of the MARB/IPA ALUCP. The eastern portion of the Project site falls within the MARB's CNEL noise contours above 60 dBA CNEL but below 65 dBA CNEL. The City General Plan states that office uses are normally compatible up to 65 dBA CNEL and conditionally compatible up to 70 dBA CNEL. The Project would provide office areas along the southwestern corner of the building. The Project's office components would be located outside the 65 dBA CNEL contour and would therefore be compatible with the General Plan. Hotel uses would be normally compatible up to 60 dBA CNEL and conditionally compatible up to 70 dBA CNEL. The hotel portion of the project would be located outside the 60 dBA CNEL contour, and would therefore be compatible with the General Plan as it relates to airport noise exposure.

PVCCSP EIR MM Noise 5 would require new noise-sensitive land uses, such as the hotel, to ensure that exterior noise levels do not exceed 60 dBA and interior noise levels do not exceed 45 dBA. This measure would apply to the hotel use and would account for noise generated by nearby roadways, such as Ramona Expressway and Perris Boulevard.

[2] Equipment PPV = Reference PPV * $(25/D)^n$ (in/sec), where Reference PPV is PPV at 25 feet, D is distance from equipment to the receiver in feet, and n = 1.1 (the value related to the attenuation rate through the ground); formula from Caltrans 2013b.

XIV. Population and Housing

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

Applicable PVCCSP Standards and Guidelines

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

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The proposed Project does not include residential development that would directly or indirectly affect the number of residents in the area and would not contribute to the creation of additional housing in the City. The Project includes uses that would not be of a magnitude to support additional population growth in the area. The proposed Project concept would include a warehouse building and future commercial use, analyzed as a hotel. Therefore, since the Project is intended to serve the existing population and has no other features that would directly or indirectly induce growth, impacts would be less than significant and no mitigation would be required.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed Project includes the development of industrial and commercial uses on vacant land that is not currently used for housing. The proposed Project would not remove housing and would not displace substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere. There would be no impacts associated with displacing people and no mitigation would be required.

XV. Public Services

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

Applicable PVCCSP Standards and Guidelines

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

On-Site Design Standards and Guidelines (Chapter 4.0 of the PVCCSP)

4.2.1 Crime Prevention Measures

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

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

Off-Site Design Standards and Guidelines (Chapter 5.0 of the PVCCSP

5.4 Off-Site Infrastructure Standards

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

a) Fire protection?

Less Than Significant Impact. The proposed Project would include the construction and operation of a warehouse facility and future commercial use that would require fire protection services; however, no new residential uses or other uses that would increase the City's population would be involved. The City contracts with the Riverside County Fire Department to provide fire protection services within the City and has two fire stations within its boundaries that are served by 14 firefighters (City 2021). The two fire stations are located at 210 W. San Jacinto Avenue (Station No. 1) and 333 Placentia Avenue (Station No. 90) and are located approximately 4.0 and 1.6 miles from the Project site, respectively. As such, the nearest fire station and presumed first responder is Station No. 90. While the Project site is identified for commercial development and the proposed Project would allow for industrial and commercial uses, the Project would not spur the growth of the region in an unplanned manner that would require the construction of new or expanded fire protection facilities. However, the Project sponsor would be required to pay a Development Impact Fee (DIF) for fire services that would support fire protection services at the Project site. Therefore, impacts would be less than significant and no mitigation would be required.

b) Police protection?

Less Than Significant Impact. The proposed Project would include the construction and operation of warehouse facility and future commercial use that would require police protection services; however, no new residential uses or other uses that would increase the City's population would be involved. The City contracts with the Riverside County Sheriff's Department to provide police protection services within the City and has a police station located at 137 North Perris Boulevard, approximately 4.0 miles south of the Project site. While the Project site is identified for commercial development and the proposed Project would allow for industrial and commercial uses, the Project would not spur the growth of the region in an unplanned manner that would place unexpected future demands on existing police protection services. The Project would also not represent a use that would require unique or expanded police protection services. As a result, the Project itself is not expected to require the construction of new or expanded police protection facilities; however, the Project sponsor would be required to pay a Development Impact Fee (DIF) that would support police protection services at the Project site. Therefore, impacts would be less than significant and no mitigation would be required.

c) Schools?

No Impact. The proposed Project involves the construction and operation of warehouse and commercial facilities. It is not anticipated to introduce new residents to the Project site that would generate new students and require additional schools. No impacts related to schools would occur.

d) Parks?

No Impact. The proposed Project involves the construction and operation of a warehouse facility and future commercial use. It is not anticipated to result in increased use or demand on parks that would require the construction or expansion of additional park and recreational facilities. Therefore, there would be no impact.

e) Other public facilities?

No Impact. Other public facilities may include libraries, senior centers, community centers, and pools, all of which are intended to serve the general public. The proposed Project involves the construction and operation of a warehouse facility and future commercial use and would not result in increased demand on these services that would require the construction or expansion of other public facilities. Therefore, there would be no impact.

XVI. Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	■
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	■

Applicable PVCCSP Standards and Guidelines

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

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

8.2.1.4 Employee Break Areas and Amenities

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

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. The proposed Project consists of construction and operation of a warehouse facility and future commercial use. The Project would not increase the use of or create the need for new parks and recreational facilities. Similarly, the proposed Project would not result in physical deterioration of an existing open space area or any recreation facilities. Therefore, there would be no impact.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The proposed Project consists of construction and operation of a warehouse facility and future commercial use that would not require or result in the need to construct or expand recreational facilities. Therefore, there would be no impact.

XVII. Transportation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	■	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	■	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	■	☐
d) Result in inadequate emergency access?	☐	☐	■	☐

A Traffic Analysis prepared by Urban Crossroads (2022) was prepared for the proposed Project and is attached to this IS/MND as Appendix J. Its findings and recommendations are incorporated into the following analysis.

Applicable PVCCSP Standards and Guidelines

The PVCCSP Standards and Guidelines summarized below relevant to the analysis of transportation/traffic presented in this Initial Study are incorporated as part of the proposed Project and assumed in the analysis presented in this section. Additionally, a Traffic Study was prepared by Urban Crossroads for the proposed Project (Appendix J). The information and recommended measures provided in that report are also incorporated into the analysis below.

Infrastructure Plan (Chapter 3.0 of the PVCCSP)

3.1 Circulation

The Circulation Plan provides Standards and Guidelines intended to ensure the safe and efficient movement of people and goods within the PVCCSP area, as well as meeting the future transportation needs City-wide.

3.2 Vehicular Circulation

Freeway

Interstate-215 (North-South): Interstate-215 runs along the Western boundary of the PVCC. Existing Freeway on and off-ramps are located at Harley Knox Boulevard and Ramona Expressway. Placentia Avenue is a planned future interchange

Expressways

An expressway is a limited access divided highway built to accommodate high-speed travel by automobiles within a 184-foot right-of-way. At least two traffic lanes in each direction are physically separated within a 134-foot curb-to-curb width.

Arterials

An arterial serves major traffic movements or major traffic corridors within 128-foot right-of-way. While they may provide access to abutting land, their primary function is to serve traffic moving through the area. Arterial streets generally have a curb-to-curb width of 94-feet.

A secondary arterial is intended to carry local traffic between the local street system and the primary arterial system. Arterial streets generally vary from a curb-to-curb width of 64-feet to 70-feet and may have one or two lanes in each direction.

3.2.2 Truck Circulation

The PVCCSP area is primarily intended to accommodate commercial and industrial uses and as such, requires a greater need for established truck routes to serve existing and future businesses. The City has adopted specific truck routes throughout the Perris Valley Commerce Center area in an effort to separate passenger and truck traffic and move truck traffic efficiently through the Project site while avoiding residential communities as much as possible. Existing truck routes are identified on Figure 3 as shown below but should be verified with the City's General Plan for the most up to date information as some streets may be removed once others have been improved such as Ramona Expressway and Perris Boulevard:

- Harley Knox Boulevard from Redlands Avenue to Interstate-215
- Placentia Avenue from Perris Boulevard to Interstate-215
- Perris Boulevard within the entire Specific Plan boundary
- Morgan Street from Frontage Road to Redlands Avenue
- Rider Street from Frontage Road to Perris Boulevard

- Western Way from Harley Knox to northerly City limit Specific Plan Boundary
- Indian Avenue from Placentia Avenue to Harley Knox Boulevard
- Redlands Avenue from Rider Street to Harley Knox Boulevard

Off-Site Design Standards and Guidelines (Chapter 5.0 of the PVCCSP)

5.2 Off-Site Vehicular Circulation: Roadway Standards and Guidelines, Truck Route Standards and Guidelines

The PVCC Circulation Plan establishes the general alignments and right-of-way sections to safely meet the transportation needs of its residents, businesses, and visitors. The improvements required for development of individual projects along segments of roadways identified on the Circulation Plan will be confirmed at the development stage.

The following mitigation measures from the PVCCSP EIR that are applied to this project are as follows:

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

MM Trans 2 Sight distance at the project entrance roadway of each implementing development project shall be reviewed with respect to standard City of Perris sight distance standards at the time of preparation of final grading.

MM Trans 3 Each implementing development project shall participate in the phased construction of off-site traffic signals through payment of that project's fair share of traffic signal mitigation fees and the cost of other off-site improvements through payment of fair share mitigation fees which include TUMF (Transportation Uniform Mitigation Fee), DIF (Development Impact Fee), and the NPRBBD (North Perris Road and Bridge Benefit District). The fees shall be collected and utilized as needed by the City of Perris to construct the improvements necessary to maintain the required level of service and build or improve roads to their build-out level.

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

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

~~**MM Trans 6** Each implementing development project that is located adjacent to the MWD Trail shall coordinate with the City of Perris Parks and Recreation Department to determine the development plan for the trail.~~

MM Trans 7 Implementing project-level traffic studies shall be required for all subsequent implementing development proposals within the boundaries of the PVCC as approved by the City of Perris Engineering Department. These subsequent traffic studies shall identify specific project deficiencies and needed roadway improvements to be constructed in conjunction with each implementing development project. All intersection spacing for individual tracts or maps shall conform to the minimum City intersection spacing standards. All turn pocket lengths shall conform at least to the minimum City turn pocket length standards. If any of the proposed improvements are found to be infeasible, the implementing development project applicant would be required to provide alternative feasible improvements to achieve levels of service satisfactory to the City.

MM Trans 8 Proposed mitigation measures resulting from project-level traffic studies shall be coordinated with the North Perris Road and Bridge Benefit District (NPRBBD) to ensure that they are in conformance with the ultimate improvements planned by the NPRBBD. The applicant shall be eligible to receive proportional credits against the NPRBBD for construction of project level mitigation that is included in NPRBBD.

Project Site Access

Site access for personal vehicles would be provided from Ramona Expressway and Perris Boulevard. One driveway from the center of the Project site along Ramona Expressway would provide non-commercial truck access to the site and personal vehicle access to the warehouse area. A driveway in the northeastern corner of the site would provide access from Perris Boulevard to the future commercial use. Truck and commercial traffic would enter and exit the Project site from Indian Avenue via a 56-foot-wide driveway in the northwestern part of the Project site.

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. The Traffic Analysis for the Project evaluates the proposed Project's impacts on traffic. The trips generated by the Project's proposed land uses have been estimated based on trip generation rates collected by the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition, 2021, for warehouse use and a hotel use. Given that, the proposed Project is projected to generate 1,402 two-way trip-ends per day on a typical weekday with approximately 96 AM peak hours trips and 116 PM peak hour trips (actual vehicles). Impacts related to VMT are discussed in response to the threshold below.

The PVCCSP EIR identified several transportation guidelines, identified in the "PVCCSP Applicable Guidelines" section above. With the incorporation of the PVCCSP guidelines above, impacts to existing County plans would be less than significant. PVCCSP EIR mitigation measure MM Trans 4 has been completed given coordination with the RTA, which is further documented in Section III. PVCCSP EIR mitigation measure MM Trans 6 does not apply to the Project, as it is not located adjacent to the MWD Trail.

To further evaluate if the Project would conflict with existing circulation plans, or effectiveness of circulation, a traffic signal warrant analysis was conducted by Urban Crossroads and summarized in the Traffic Analysis (Appendix J). The signal warrant criteria for existing conditions are based upon several factors, including volume of vehicular and pedestrian traffic, frequency of accidents, and location of school areas. The Caltrans Manual on Uniform Traffic Control Devices indicates that the installation of a traffic signal should be considered if one or more signal warrants are met. Specifically, this Traffic Analysis utilizes the Peak Hour Volume-based Warrant 3 as the appropriate representative traffic signal warrant analysis for existing study area intersections for all analysis scenarios. Warrant 3 is appropriate to use for this TAS because it provides specialized warrant criteria for intersections with rural characteristics (e.g., located in communities with populations of less than 10,000 persons or with adjacent major streets operating above 40 miles an hour).

Traffic signal warrants for existing traffic conditions are based on existing peak hour intersection turning volumes. There are no applicable study area intersections that may warrant a traffic signal for existing (2021) traffic conditions.

The proposed Project would include site access and roadway improvements to Ramona Expressway, Indian Avenue, and Perris Boulevard. Ramona Expressway is an east-west oriented roadway located along the Project's northern boundary. Ramona Expressway is currently constructed at its ultimate half-section pavement width as an Expressway (184-foot right-of-way) between the western and eastern boundaries consistent with the PVCCSP and the City of Perris General Plan Circulation Element.

Indian Avenue is a north-south oriented roadway located along the Project's western boundary. Indian Avenue is currently constructed at its ultimate half-section pavement width as a Secondary (94-foot right-of-way) between the Project's northern and southern boundaries consistent with the PVCCSP and the City of Perris General Plan Circulation Element.

Perris Boulevard is a north-south oriented roadway located along the Project's eastern boundary. Perris Boulevard is currently constructed at its ultimate half-section pavement width as an Arterial (128-foot right-of-way) between the northern and southern boundaries consistent with the PVCCSP and the City of Perris General Plan Circulation Element. With adherence to the City of Perris Specific Plan and General Plan Circulation Element requirements, the proposed Project would have a less than significant impact related to circulation plans and policies.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. The City of Perris adopted the Transportation Impact Analysis Guidelines for CEQA in May 2020, which include VMT thresholds. The VMT Scoping Form for Land Use Projects (Appendix 1.1 of Appendix J), provided by the City of Perris, has been completed and reviewed for accuracy. Section 15064.3 of the State CEQA Guidelines, upon which the aforementioned Traffic Impact Analysis Guidelines and Scoping plan are based, recommends the use of VMT as the primary metric for the evaluation of transportation impacts, under CEQA, associated with land use and transportation projects. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. All agencies and projects State-wide are required to utilize the updated CEQA guidelines recommending the use of VMT for evaluating transportation impacts as of July 1, 2020.

The updated State CEQA Guidelines allow for lead agency discretion in establishing methodologies and thresholds provided there is substantial evidence to demonstrate that the established procedures promote the intended goals of the legislation. Where quantitative models or methods are unavailable,

Section 15064.3 allows agencies to assess VMT qualitatively using factors such as availability of transit and proximity to other destinations. The Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (State of California, December 2018) ["OPR Technical Advisory"] provides technical considerations regarding methodologies and thresholds with a focus on office, residential, and retail developments as these projects tend to have the greatest influence on VMT. The proposed Project's VMT impact has been assessed in accordance with guidance from the City of Perris Transportation Impact Analysis Guidelines for CEQA. The transportation guidelines provide a framework for "screening thresholds" for when a project is expected to cause a less than significant impact without conducting a detailed VMT study. The Project requirements for evaluation of transportation impacts under CEQA was assessed using the City of Perris VMT Scoping Form for Land Use Projects as appended to the City of Perris Traffic Impact Analysis Guidelines. The criteria for a project resulting in a less than significant VMT impact is as follows:

- Is the Project 100% affordable housing?
- Is the Project within ½ mile of the qualifying transit?
- Is the Project a local serving land use?
- Is the project in a low VMT area?
- Are the Project's Net Daily Trips less than 500 ADT?

The Project meets the Local-Serving Land Use screening criteria for the hotel component and Net Daily Trips less than 500 ADT criteria for the warehouse component. Therefore, a detailed VMT study is not required and impacts related to VMT would be less than significant.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The Project site is within the influence area of the MARB/IP and does not include any design features that would increase traffic hazards. The Project is consistent with the on-site and surrounding land use and zoning designations, and implementation of the Project will not introduce incompatible uses to the Project site. Improvements related to safety contained in the PVCCSP EIR mitigation measure MM Trans 2 will ensure that adequate site distance is provided at each Project access location. Additionally, prior to the issuance of final occupancy, City staff will ensure that signing/striping are implemented in conjunction with the detailed construction plans for the Project site and off-site improvement area.

Implementation of PVCCSP EIR MM Trans 3 shall require signage be posted on-site directing truck drivers to use the existing City truck route on Harley Knox Boulevard. The information on the signage will be coordinated with City Planning and the City's Traffic Engineer during the plan check process. Furthermore, Driveway 1 and Indian Avenue (truck access only) is not anticipated to warrant a traffic signal based on future projected daily traffic. This truck access driveway would be separated from the passenger car parking areas (accessible via Driveways 2 and 3) by a crash gate to ensure the safety of pedestrians and passenger cars. Additionally, the operation of the Project would occur within one parcel and would not create dangerous curves or intersections. During construction, the proposed Project

would comply with all local regulations regarding temporary road closures or/and/or one-way traffic controls. Impacts would be less than significant and no project-specific mitigation would be required.

d) Result in inadequate emergency access?

Less Than Significant Impact. A significant impact would occur if the design of the proposed Project would not satisfy emergency access requirements of the Riverside County Fire Department or in any other way threaten the ability of emergency vehicles to access and serve the Project site or adjacent uses. The proposed Project would not result in inadequate emergency access. As discussed above, access to the site will be provided via a driveway on Indian Avenue, a driveway from Ramona Expressway, and a driveway off Perris Boulevard. The driveways are of standard size to accommodate passenger cars, and the driveway off Indian Avenue is expected to accommodate trucks. All access features are subject to the City of Perris design requirements, including the Fire Department's requirement of a minimum 20-foot width for driveways. Because of this, emergency vehicles would be able to access the Project site. Impacts associated with this issue would be less than significant and no mitigation would be required.

XVIII. Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	■	☐	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	■	☐	☐

A Cultural Resources Survey Report (HELIX 2022d) which is attached to this IS/MND as Appendix D, was prepared for the proposed Project. Its findings and recommendations are also incorporated into the

following analysis. Further background information regarding the records searches, Native American correspondence, and surveys completed for this Project is available in Section V, Cultural Resources.

Applicable PVCCSP Standards and Guidelines

There are no PVCCSP Standards and Guidelines or PVCCSP EIR mitigation measures related to the analysis of tribal cultural resources. The Cultural Resources Survey (HELIX 2022d; Appendix D) was prepared for the Project in compliance with PVCCSP EIR mitigation measure MM Cult 1, provided in Section V, Cultural Resources. Additional PVCCSP EIR mitigation measures related to cultural resources have been replaced by the City of Perris as reflected in Project Mitigation Measures MM Cult 1 and MM Cult 2.

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

   i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

   ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant with Mitigation Incorporated. Based on the results of the cultural resources survey conducted for the Project (HELIX 2022d; Appendix D), no known tribal cultural resources are present on the Project site. However, there is the potential for previously undiscovered tribal cultural resources to occur at the Project site given the cultural significance of the area identified by tribes in the region. Ground disturbing activities could harm previously undiscovered subsurface resources which would be a potentially significant impact. The Cultural Resources Survey recommends that a Native American monitoring program be implemented. This would be implemented through Project mitigation measure MM Cult 1. Project mitigation measure MM Cult 1, provided in Section V, Cultural Resources, implements PVCCSP EIR mitigation measures MM Cultural 2 through MM Cultural 4, as subsequently revised by the City of Perris.

In the unlikely event that human remains are discovered during construction, all activities in the vicinity of the remains shall cease and the contractor shall notify the County Coroner immediately pursuant to California Health & Safety Code Section 7050.5 and California Public Resources Code Section 5097.98. Project mitigation measure MM Cult 2 shall be implemented to ensure impacts to potential Native American human remains are less than significant. Project mitigation measure MM Cult 2 implements PVCCSP EIR mitigation measure MM Cultural 6, as subsequently revised by the City of Perris, and is provided in Section V, Cultural Resources.

In accordance with the requirements of AB 52, the City, as the lead agency, notified the tribes identified by the NAHC. To date three tribes have responded and the City has initiated consultation, which remains ongoing. The tribes have been provided the proposed mitigation to review. With completion of

consultation pursuant to AB 52 and implementation of Project mitigation measures MM Cult 1 and MM Cult 2, impacts to tribal cultural resources would be less than significant.

XIX. Utilities and Service Systems

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

Applicable PVCCSP Standards and Guidelines and Mitigation Measures

On-Site Design Standards and Guidelines (Chapter 4.0, PVCCSP)

4.2.1 General On-Site Project Development Standards and Guidelines

Trash and Recyclable Materials

Development of all PVCCSP sites shall contain enclosures (or compactors) for collection of trash and recyclable materials subject to water quality and best management practices. All trash enclosures shall comply with City of Perris Standards and with applicable City of Perris recycling requirements.

Waste Hauling

Construction and other waste disposal shall be hauled to a city approved facility.

4.2.7 Utilities

Utility Connections and Meters

All utility connections and meters shall be coordinated with the development of the site and should not be exposed, except where deemed appropriate or necessary by the building official. To the greatest extent possible, these utility connections should be integrated into the building or the architectural design.

Pad-Mounted Transformers and Meter Box Locations

Pad-mounted transformers and/or meter box locations shall be screened from view from surrounding properties and public rights-of-way. Utilities shall be located underground, unless waived by the City Engineer.

Electrical, Telephone, CATV and Similar Service Wires and Cables

All electrical, telephone, CATV and similar service wires and cables which provide direct service to the property being developed, within the exterior boundary lines of such property, shall be installed underground. Electrical Transmission Lines Electrical transmission lines 66kv and less shall be installed underground. All equipment shall be internalized into the building design to the greatest extent possible. When unfeasible, they shall be screened and not prominently visible from public rights-of-way.

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. The proposed Project is in a developing area with existing infrastructure. Wastewater services are provided by the EMWD, which is managed by the Metropolitan Water District of Southern California (MWD). A secondary source of imported water is provided by the Colorado River Aqueduct. The water used within the EMWD service area as of 2015 was approximately 147,300 AFY and is expected to increase to 268,200 AFY (during a normal year) by the year 2040, an increase of 120,900 AFY.

Based on the CalEEMod assumptions for water usage, the proposed Project's estimated water demand is approximately 1.65 AFY, within the estimated increase in water demand. With regard to wastewater, a new development in the City is required to install wastewater infrastructure concurrent with Project development. Wastewater in the City is treated by the EMWD at the Perris Valley Regional Water Reclamation Facility (PVRWRF); the facility has typical inflows of 13.8 million gallons per day (mgd; Eastern Municipal Water District 2014). Currently, the facility has the capacity to treat 22.0 mgd, so the facility has the capacity for potential future increases in wastewater. The Project includes the construction of a warehouse, office space area, parking lot and truck dock stations. All wastewater generated from the office space and warehouse would be discharged into the local sewer main and conveyed for treatment.

Based on the CalEEMod assumptions, the proposed Project's total estimated water demand is approximately 46.29 million gallons per year, which would translate to an average of approximately 0.13 mgd. Estimated wastewater generation for the proposed Project is 45.14 million gallons per year or 0.12 mgd. This volume is within the remaining capacity of the PVRWRF's 13.8 mgd total treatment

capacity. This Project would thus have a less than significant impact on the ability of the PVRWRF to operate within its established wastewater treatment requirements, which are enforced via the facility's NPDES permit authorized by the Santa Ana Regional Water Quality Control Board (SARWQCB). Therefore, the proposed Project would have a less than significant impact related to wastewater treatment requirements of the SARWQCB.

Potentially significant impacts could occur as a result of the Project if stormwater runoff was increased to a level that would require the construction of new storm drainage facilities. As discussed in Section X, *Hydrology*, the Project would not generate any increased runoff from the site that would require the construction of new storm drainage facilities.

The Project applicant/developer would be required to provide all necessary on-site infrastructure. Line E, which has been discussed in previous sections, is part of the utility infrastructure that will constructed with this project. Within the Project boundary, Line E will consist of an underground reinforced concrete box and pipe that will connect to a detention basin near Ramona Expressway and I-215, run along the southern Project boundary, jog north, and connect at the eastern Project boundary to the existing lateral that runs north and south in Perris Boulevard. This interim proposed connection of Line E will be in place until such time as the City constructs additional downstream sections of the Line E storm drain. Those future Line E extensions are not part of the Project and not required to meet the Project storm water or water quality requirements.

Impacts would be less than significant, and no mitigation beyond compliance with existing regulations is required. The proposed Project would have a less than significant impact on requiring the construction of new facilities or expansion of existing storm drainage facilities.

In conclusion, connections to these utilities would be made at the Project site during construction and would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities that could cause additional significant environmental effects. Therefore, impact is less than significant

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. Operation of the proposed Project would result in increases in water demand. City residents and businesses, including the future operator of the Project site, are served by the EMWD. Water is imported via the California Aqueduct from northern and central California, which is managed by the Metropolitan Water District of Southern California (MWD). A secondary source of imported water is provided by the Colorado River Aqueduct. As of June 2021, the EMWD is in the process of updating their Urban Water Management Plan, which was last updated in 2015. According to the 2015 Urban Water Management Plan for EMWD, the EMWD will continue to rely on imported water from the MWD as the main source of supply. The water used within the EMWD service area as of 2015 was approximately 147,300 AFY and is expected to increase to 268,200 AFY (during a normal year) by the year 2040, an increase of 120,900 AFY. Based on the CalEEMod assumptions, the proposed Project's estimated water demand is approximately 167 AFY. According to the 2015 Urban Water Management Plan for EMWD, there is sufficient supply to accommodate demand under normal and single- and multiple-dry year conditions utilizing imported water. Local supplies would supplement imported supplies and provide additional supply reliability. Local supplies include groundwater pumped from the San Jacinto groundwater Basin, desalinated groundwater, and recycled water.

Connections to local water mains would involve temporary and less than significant construction impacts that would occur in conjunction with other on-site improvements. The Project site is located within the existing service area of the EMWD and is surrounded by existing development that is currently connected to existing EMWD water lines. No additional improvements are needed to water lines or facilities to serve the proposed Project. Standard connection fees would address any incremental impacts of the proposed Project. Therefore, the proposed Project will have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts will be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. Wastewater generated at the Project site would be treated by the EMWD at the PVRWRF; the facility has typical inflows of 15.5 mgd and a current capacity of 22 mgd. The ultimate capacity of the PVRWRF is anticipated to increase to 100 mgd (EMWD 2021). The PVRWRF has typical inflows of 13.8 mgd (Eastern Municipal Water District, 2014). Currently, the facility has the capacity to treat 22.0 mgd, so the facility has the capacity for potential future increases in wastewater associated with the proposed Project. Therefore, the expansion of the existing facility would not be required, and impacts will be less than significant.

Connections to local water and sewer mains would involve temporary and less than significant construction impacts that would occur in conjunction with other on-site improvements and that were analyzed as part of the Project. The Project site is located within the existing service area of the EMWD and is surrounded by existing development that is currently connected to existing EMWD water and wastewater lines. No additional improvements are needed to either water lines, sewer lines, or treatment facilities to serve the Project. Standard connection fees would address any incremental impacts of the Project. Therefore, the Project would result in less than significant impacts with regard to the need for new or expanded wastewater treatment facilities.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Significant impacts could occur if the proposed Project would exceed the existing permitted landfill capacity or if it would violate federal, state, and local statutes and regulations. Solid waste disposal services in the City of Perris are provided by CR&R Incorporated – Environmental Services. Waste from Perris is primarily transferred to the El Sobrante Landfill in Corona or the Badlands Landfill in Moreno Valley. These solid waste facilities serving Riverside County have a combined remaining capacity of 151,777,170 tons. The Badlands Landfill is expected to close in 2026 while the El Sobrante Landfill has the capacity to remain open until 2051 (CalRecycle 2022).

Overall, the amount of solid waste produced as a result of this Project is negligible compared to the capacity available at the two primary landfills. Compliance with County waste reduction programs and policies would also reduce the volume of solid waste entering landfills. Individual development projects within the County would be required to comply with applicable state and local regulations, thus reducing the amount of landfill waste by at least 50 percent. Therefore, because there would be adequate landfill capacity in the region to accommodate Project-generated waste, and the proposed

Project is not expected to generate a substantial quantity of solid waste, the impact would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to decrease solid waste generation through mandatory reductions in solid waste quantities (e.g., through recycling and composting of green waste) and the safe and efficient transport of solid waste. The proposed Project would be required to coordinate with CR&R Waste Services to develop a collection program for recyclables, such as paper, plastics, glass, and aluminum, in accordance with local and State programs, including the California Solid Waste Reuse and Recycling Act of 1991. Additionally, the proposed Project would be required to comply with applicable practices enacted by the City under the California Integrated Waste Management Act of 1989 (AB 939) and any other applicable local, State, and federal solid waste management regulations. AB 939 requires all counties to prepare a County Integrated Waste Management Plan (CIWMP). The County of Riverside adopted its CIWMP in 1998. The CIWMP includes the Countywide Summary Plan; the Countywide Siting Element; and the Source Reduction and Recycling Elements, the Household Hazardous Waste Elements, and Non-disposal Facility Elements for Riverside County and each city in Riverside County. In summary, the proposed Project would comply with all regulatory requirements regarding solid waste.

XX. Wildfire

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	■
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	■
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	■

Applicable PVCCSP Standards and Guidelines

There are no Standards and Guidelines or mitigation measures related to wildfire management included in the PVCCSP or its associated PVCCSP EIR.

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. According to Figure S-05, Wildfire Hazards, of the City of Perris General Plan Safety Element, the Project site is located within a Local Responsibility Area and is not located in or near an area identified as being a Very High Fire Hazard Severity Zone (Perris, 2022). The Project site is not within a State Responsibility Area. Therefore, the Project would have no impacts related to wildfires or the associated issues identified in thresholds a through d, above. No impacts would occur and no mitigation is required.

XXI. Mandatory Findings of Significance

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	■	☐	☐
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present, and probable future projects)?	☐	☐	■	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	■	☐	☐

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number, or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant with Mitigation Incorporated. The preceding analysis that the proposed Project has the potential to adversely affect air quality, biological resources, cultural resources, noise, and transportation. See Sections III, IV, V, XIII, and XVII for discussion of the proposed Project's potential impacts on these environmental issue areas. With implementation of the mitigation measures identified in those Sections, and compliance with City programs and requirements identified in this report, impacts would be reduced to a less than significant level. No Significant or potentially significant impacts would remain.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present, and probable future projects)?

Less Than Significant Impact. State CEQA Guidelines Section 15130 requires a discussion of the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable," meaning that the project's incremental effects are considerable when viewed in connection with the effects of past, current, and probable future projects. While the proposed Project would indirectly contribute to cumulative impacts associated with increase urban development in the region, these impacts have been previously evaluated by the City and considered in development of the City's General Plan and PVCCSP as set forth in this Initial Study. Transportation is a key area of concern and is discussed in detail below.

Cumulative transportation impacts were evaluated in the traffic impact analysis prepared for the Project (Urban Crossroads 2022). The Project's impacts to VMT were analyzed against the City of Perris Transportation Guidelines and the requirements for VMT analysis specified by Section 15064.3, subdivision (b). The Project's VMT impacts were found to be less than significant. However, in order to ensure continued functionality of regional circulation infrastructure, the Traffic Analysis made intersection recommendations and detailed the fees that would be owed to the City. Off-site improvements, such as traffic signals, which are needed to serve cumulative traffic conditions are funded through the payment of fees to the City. The Project is within the North Perris Road and Bridge Benefit District, which is intended to provide transportation improvements specifically to the PVCCSP area. Fair share fees are collected by the City and used as part of a funding mechanism aimed at ensuring that regional highways and arterial expansions keep pace with the projected population

increases. The applicant would be required to pay the applicable fees. The Project would not result in cumulatively considerable transportation impacts.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant with Mitigation Incorporated. Based on the analyses contained in Sections I – XX of this IS/MND, the proposed Project would not result in substantial adverse effects on human beings. With implementation of the proposed mitigation, potentially significant impacts would be reduced to a level of less than significant. Direct and indirect impacts to human beings as a result of the proposed Project would be less than significant with mitigation.

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