INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION 2375

PATTERSON COMMERCE CENTER

DEVELOPMENT PLAN REVIEW (DPR 22-00003)
VESTING TENTATIVE PARCEL MAP No. 38384 (VTPM 22-05043)

Lead Agency:

City of Perris

135 N. D Street Perris, California 92570

Contact: Lupita Garcia Planning Division (951) 943-5003 x236

April 2023

Initial Study/ Mitigated Negative Declaration 2375

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SECTION 1.0 INTRODUCTION

1.1 PURPOSE AND SCOPE

Pursuant to the California Environmental Quality Act (CEQA, California Public Resources Code, Sections 21000, et seq.) and the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines, California Code of Regulations, Title 14, Sections 15000 *et seq.*), this Initial Study has been prepared in order to determine whether implementation of the proposed Patterson Commerce Center Project – DPR 22-00003 and VTPM 38384 (Project), including off-site improvements, could result in potentially significant environmental impacts that would require the preparation of an Environmental Impact Report (EIR). This Initial Study has evaluated each of the issue areas contained in the checklist provided in Section 3.0 of this document. The objective of this environmental document is to inform City of Perris decision makers, representatives of other affected/responsible agencies, and other interested parties of the potential environmental effects that may be associated with the Project.

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

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

CEQA requires that an environmental document include a description of the project's environmental setting or "baseline." (State CEQA Guidelines Section 15063(d)(2).) The State CEQA Guidelines provide that the baseline "normally" consists of the "physical environmental conditions as they exist at the time . . . environmental analysis is commenced, from both a local and regional perspective." (State CEQA Guidelines Section 15125(a)(1).) "Where existing conditions change or fluctuate over time, and where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational,

or both" (*Id.*) The baseline conditions for this Initial Study appropriately reflect existing conditions and operations associated with the onsite uses when the environmental analysis commenced in late 2021, which is further discussed in Section 2.1 below.

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 PVCCSP planning area. The City of Perris requires that future development projects within the PVCCSP planning area comply with the required PVCCSP Standards and Guidelines and applicable PVCCSP EIR mitigation measures as outlined in the MMRP, and that these requirements are to be implemented in a timely manner. Relevant Standards and Guidelines from the PVCCSP and PVCCSP EIR mitigation measures that are applicable to the Project are listed in the introduction to the analysis for each topical issue in Section 3.0 and are assumed in the analysis presented.

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

1.2 FINDINGS OF THIS INITIAL STUDY

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

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

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning

- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

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

The analysis for the following environmental topics indicates the potential for significant impacts and the need for Project-specific mitigation: Aesthetics, Cultural Resources, Geology and Soils (Paleontological Resources), and Tribal Cultural Resources. With the implementation of Project-specific mitigation measures, these impacts would be less than significant. No potentially significant impacts requiring the preparation of an EIR would result from the Project.

1.3 CONTACT PERSON

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

Lupita Garcia, Associate Planner City of Perris Planning Division 135 N. D Street Perris, California 92570 (951) 943-5003 x236 Igarcia@cityofperris.org

SECTION 2.0 PROJECT DESCRIPTION

2.1 PROJECT SITE LOCATION AND SETTING

The Project site encompasses approximately 16.1 gross-acres (approximately 14.2 net-acres)¹ and is located southwest of the Nance Street/Patterson Avenue intersection, bound by Wade Avenue to the west, Washington Street to the south, Patterson Avenue to the east, and Nance Street to the north. The site is in the northwestern portion of the PVCCSP planning area, in the City of Perris (City), in Riverside County. Local access to the Project site is provided from the roadways adjacent to the Project site. Interstate (I)-215 is immediately west of Wade Avenue. Wade Avenue also forms the western boundary of the PVCCSP planning area and the jurisdictional boundary for the City. The area west of Wade Avenue and I-215 is within unincorporated Riverside County. Exhibit 1 depicts the regional location and local vicinity of the Project site.

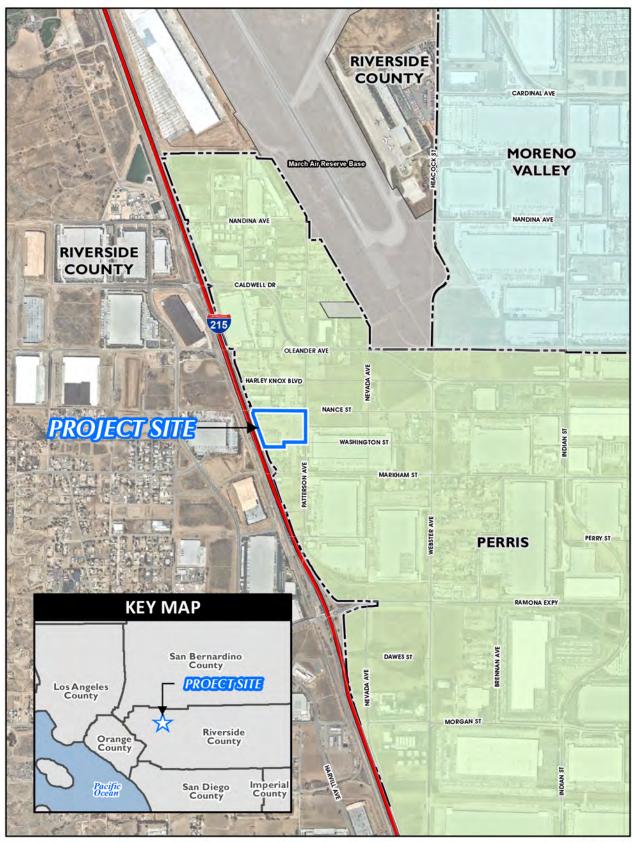
As shown on the aerial photograph on Exhibit 2, the entire Project site is disturbed. With the exception of the vacant parcel in the northwest portion of the Project site (4585 Wade Avenue; approximately 0.78 acres). GRFCO owned and occupied the Project site between 1984 and 2022. and vacated the site with the purchase of the property by RG Patterson, LLC (herein "Project Applicant") on July 14, 2022. GRFCO operated a staging yard for a construction company, conducted concrete crushing and recycling, and conducted fleet maintenance and equipment washing onsite. When the environmental analysis for this IS/MND commenced in late 2021, the southwest portion of the Project site (including former residential structures) was occupied by GRFCO (no residents) and GRFCO leased the eastern and northern portion of the Project site for truck trailer storage (starting in 2018). GRFCO vacated the site in July 2022 due to the sale and pending Project. At that time, the truck trailer storage operator entered into a lease agreement with the Project Applicant for the entire site. The property is currently leased month-to-month by the trailer storage operator and that lease will terminate upon receipt of the Project entitlements. The foundation from a previous portable structure remains at the northwest corner of the site; this area has been vacant since 2020. For purposes of the analysis in this Initial Study, the baseline condition reflects the operation of various industrial uses at the Project site, which occurred consistently for approximately 40 years and were ongoing when the environmental analysis for the Project commenced in late 2021.

Land uses in the immediate vicinity (on the opposite side of the surrounding roadways) of the Project site include industrial uses (towing company, manufactured home transporter company, manufacturing facility, truck trailer storage yard, recreational vehicle and boat storage yard, and shipping company) to the north (across Nance Street) and to the south (across Washington Street); I-215 to the west on the opposite side of Wade Avenue, and vacant, disturbed land and an industrial warehouse to the east (across Patterson Avenue). It should be noted that two non-conforming² single family residential structures are located north of the Project site (across Nance Street). With the exception of Nance Street, which is unimproved, the site-adjacent roadways are currently paved, but not improved (no curb, gutter, sidewalk, etc.).

The Project site is relatively flat, descending gradually from west to east; the elevations on site range from approximately 1,510 feet above mean sea level (amsl) in the northwest portion of the site to 1,499 feet amsl in the northeast portion of the site. The Project site is underlain by aggregate base measuring 5 to 6 inches, artificial fill extending to a depth between 2 and 2 ½ feet

¹ The Project site consists of Assessor's Parcel Numbers (APNs) 314-110-008, -009, -010, -016, -017, -018, -020 to -023, -043 to -046, -052, -053, -058, and -059.

² A non-conforming use is generally defined as a land use or structure that was legal when established but does not conform to the standards of the current zoning ordinance for the property; in this case the PVCCSP.



Source(s): Esri, Nearmap Imagery (2022), RCTLMA (2021)

Exhibit 1





Source(s): Esri, Nearmap Imagery (2022), RCTLMA (2021)

Exhibit 2



below existing site grades, and native alluvial soil extending to depth between 4½ and 8 feet below existing site grades (SCG, 2022). The Project site is on land designated by the California Department of Conservation (DOC) in its Farmland Mapping and Monitoring Program as "Urban and Built-up Land" (DOC, 2018).

As further discussed in the Biological Resources section of this Initial Study, the Project site is within the Mead Valley Area Plan area of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The Project site is completely devoid of natural vegetation communities and is characterized as disturbed/developed. The entire Project site occurs outside a designated survey area for narrow endemic sensitive species and criteria area sensitive plant species. Additionally, the Project site is not within an MSHCP Amphibian or Mammal Species Survey Area. The Project site partially occurs within a predetermined Survey Area for the burrowing owl (*Athene cunicularia*). The Project site is not located within any designated MSHCP "Criteria Area" cells, and it is not within a "Core" or "Linkage" area. No Riparian/Riverine areas or vernal pools are located within or adjacent to the Project site or offsite impact areas.

The Project site and areas to the north, south, and east are designated Light Industrial in the PVCCSP and are subject to the Development Standards and Guidelines outlined in the PVCCSP. The Light Industrial designation provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials and retail related to manufacturing.

The Project site is approximately 0.6 mile southwest of March Air Reserve Base/Inland Port Airport (MARB/IPA) and within the Airport Influence Area (AIA). Any development within this area is required to adhere to applicable provisions of the City of Perris Airport Overlay Zone, the 2014 MARB/IPA Airport Land Use Compatibility Plan (2014 MARB/IPA ALUCP), and the 2018 MARB Air Installation Compatible Use Zone (2018 AICUZ) study. The Project site is within an area designated as Zone C1 (Primary Approach/Departure Zone) in the 2014 MARB/IPA ALUCP and is not within an Accident Potential Zone (APZ).

2.2 PROJECT DESCRIPTION

2.2.1 PROPOSED BUILDING

The Project would involve construction and operation of an approximately 263,820-square-foot industrial building and associated on- and off-site improvements. The Conceptual Site Plan and Conceptual Floor Plan for the Project are presented on Exhibit 3 and Exhibit 4, respectively. The building would include approximately 10,000 square feet of potential office space in the southeast and northwest corners of the building, with 6,304 square feet of mezzanine space and 247,516 square feet of building space for warehousing and manufacturing uses. Thirty-seven (37) loading docks and two at-grade doors would be provided along the south side of the building. The Project was designed to be in compliance with the applicable Development Standards and Guidelines outlined in the PVCCSP, including but not limited to building setbacks, lot coverage, Floor Area Ratio (FAR), and architectural requirements.

Exhibit 5 and Exhibit 6 provide the conceptual building elevations for the proposed building. As shown, the building would be up to 46 feet 6 inches tall, although the roof height would vary based on the building's architectural features. As shown on Exhibit 7, the building would be constructed of painted concrete tilt-up panels and low-reflective materials, including low-reflective green glazed glass. The exterior color palette would be comprised of various shades of white and gray. The office entries would feature stone tile. As shown by the building elevations, visual relief from building form would be achieved through fenestration, mullions, exterior canopies at the office

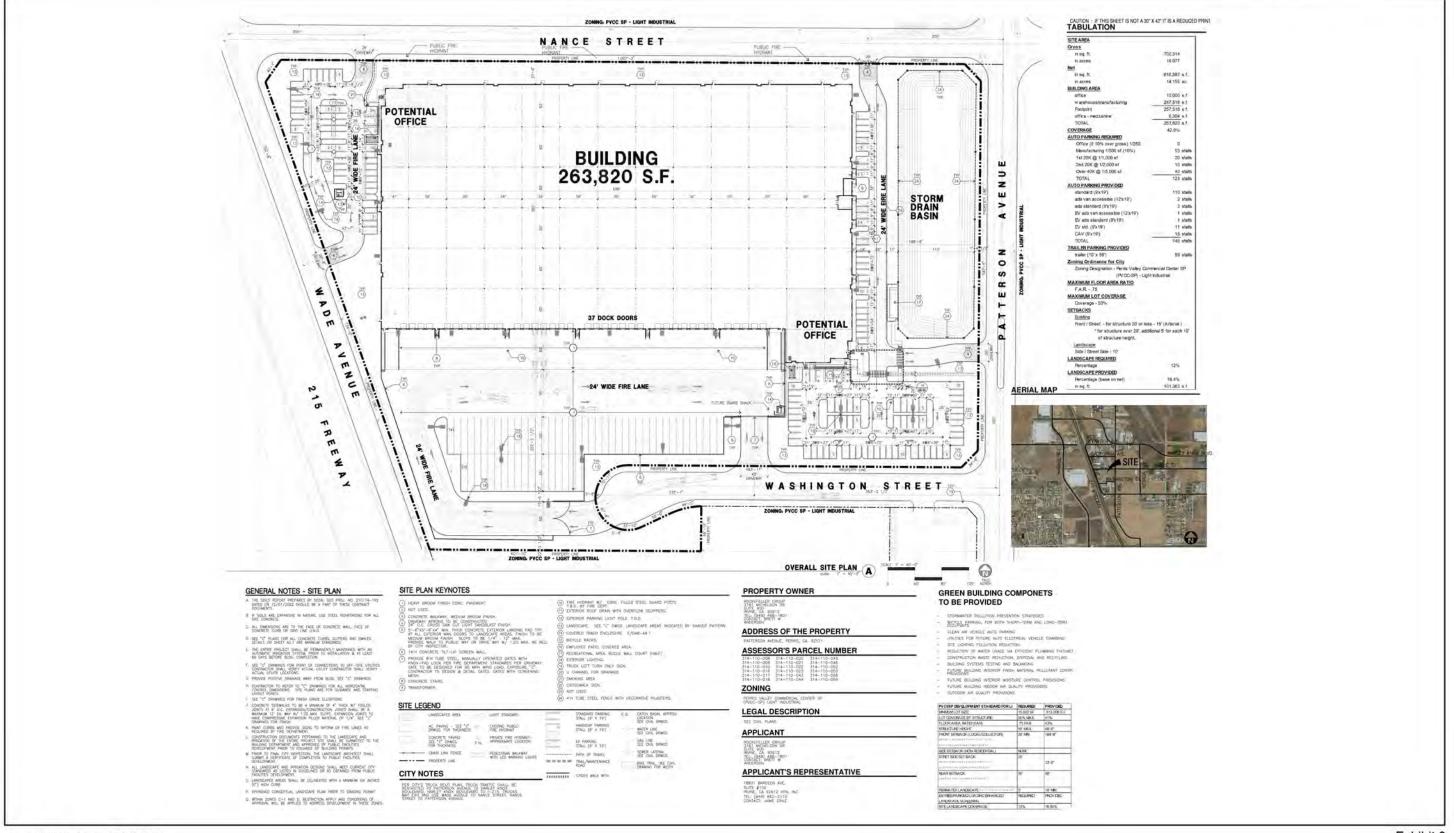
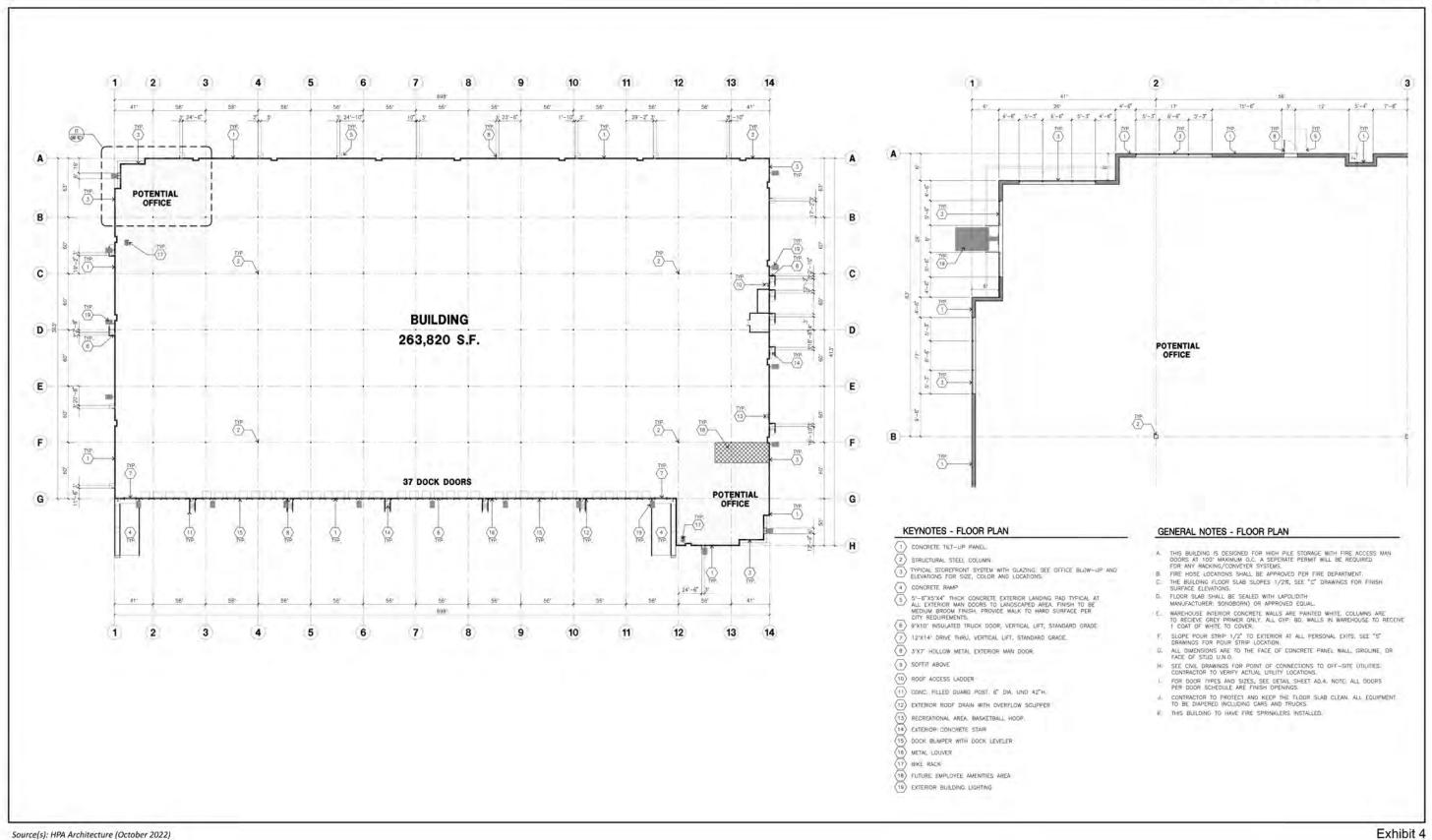


Exhibit 3 Source(s): HPA Architecture (01-30-2023)



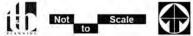




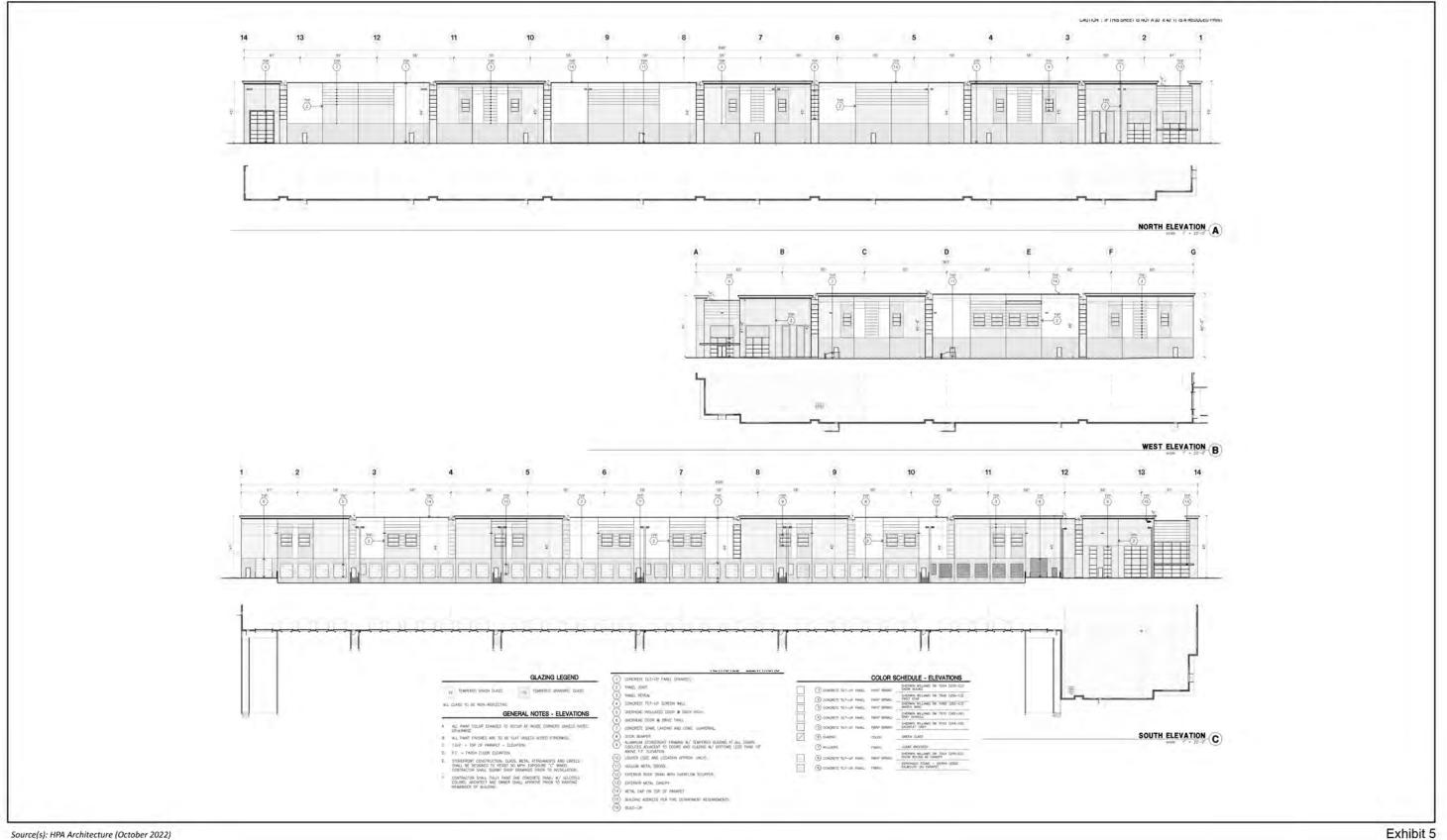


Source(s): HPA Architecture (October 2022)







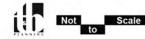


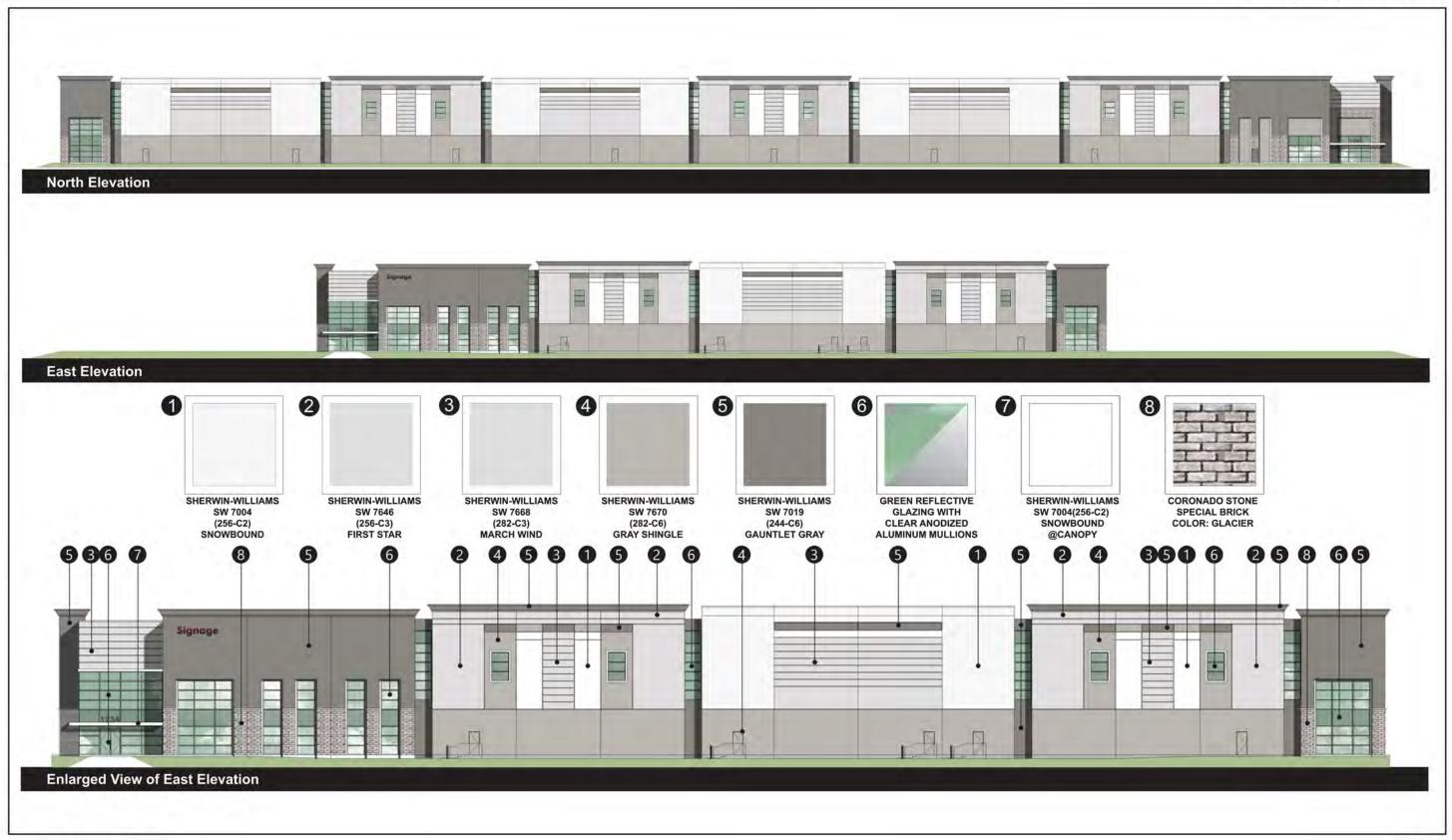
Source(s): HPA Architecture (October 2022)





Source(s): HPA Architecture (08-04-2022)





Source(s): HPA Architecture (08-01-2022)

Exhibit 7



entries, and through variations in height and rooflines, and the use of parapets. The various architectural elements are intended to effectively avoid monotony and repetition in building elevations and would minimize glare. As further discussed in the Aesthetics section of this Initial Study, rooftop equipment would be screened behind the parapet and would not be visible from adjacent streets or I-215.

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

2.2.2 CIRCULATION AND PARKING

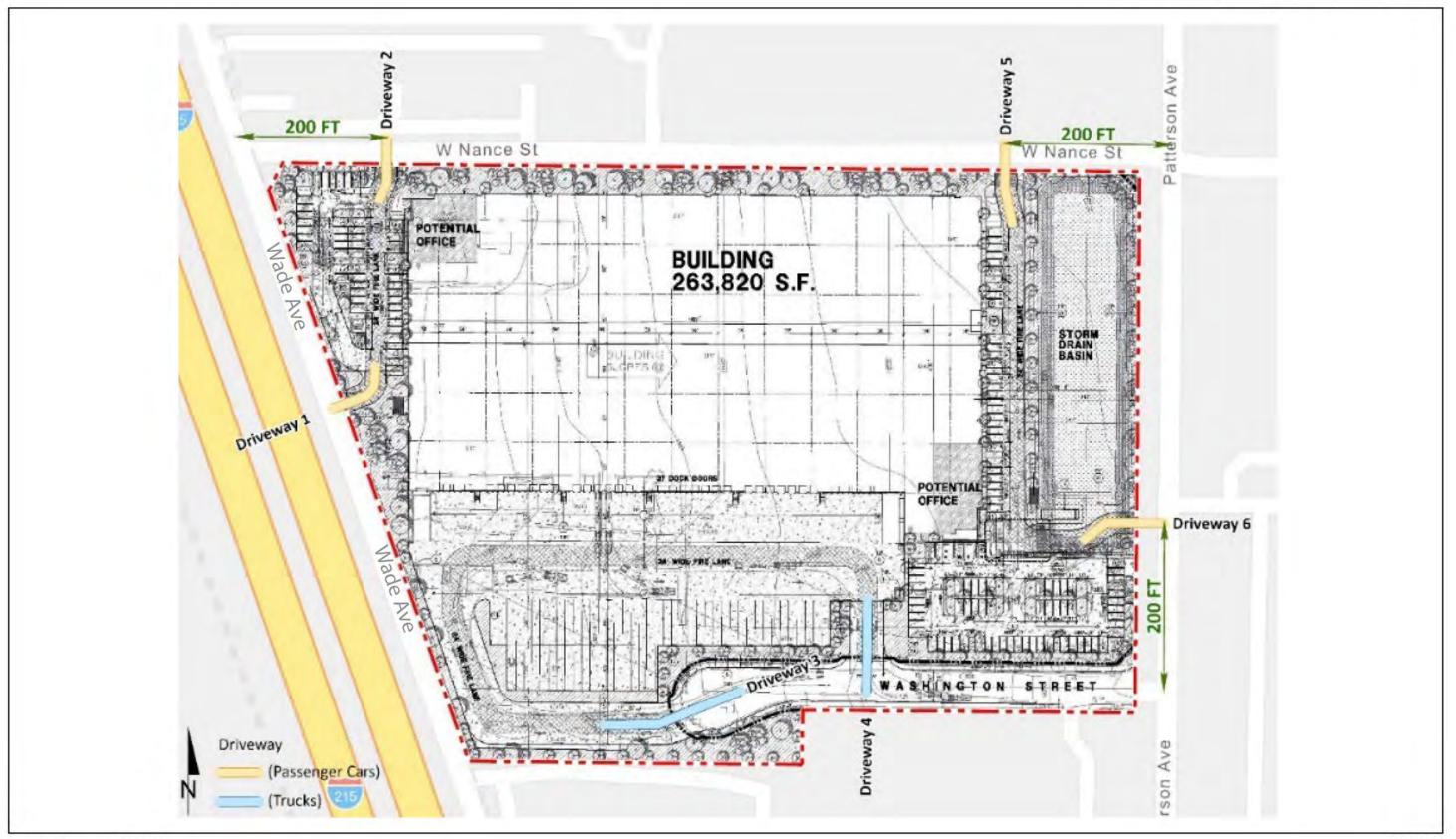
Section 3.0 of the PVCCSP contains the Infrastructure Plan, including a Circulation Plan, for the PVCCSP planning PVCCSP planning area. The Circulation Plan provides Standards and Guidelines related to vehicular circulation (including passenger vehicles, trucks, and mass transit) and non-vehicular circulation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

VEHICULAR CIRCULATION

As shown on Exhibit 8, access to the Project site would be provided via one driveway along Wade Avenue, two driveways along Nance Street, one driveway along Patterson Avenue, two driveways along Washington Street. The following describes the function of each driveway access:

- Driveway 1 on Wade Avenue full access for passenger cars only
- Driveway 2 on Nance Street full access for passenger cars only
- Driveway 3 on Washington Street full access for trucks only
- Driveway 4 on Washington Street full access for trucks only
- Driveway 5 on Nance Street full access for passenger cars only
- Driveway 6 on Patterson Avenue right-in/right-out for passenger cars only

The Project would include construction of site-adjacent roadway improvements; the proposed street sections are shown on Exhibit 9. The portions of Nance Street and Washington Street that abut the northern and southern Project site boundary would be constructed to their ultimate half width as a Local Street (60-foot right-of-way [ROW]/30-foot half-width). Patterson Avenue along the eastern Project site boundary would be built to its ultimate width as a Collector Street (66-foot ROW/33-foot half-width). Wade Avenue (Collector Street) along the western Project site boundary would be built to accommodate a 47-foot ROW. Project site frontage improvements along these roadways would include access driveways, streetlights, sidewalks, landscaping, etc. as required by the PVCCSP. These roadways would be constructed consistent with the requirements outlined in the PVCCSP, Project conditions of approval, and the City of Perris General Plan Circulation Element.



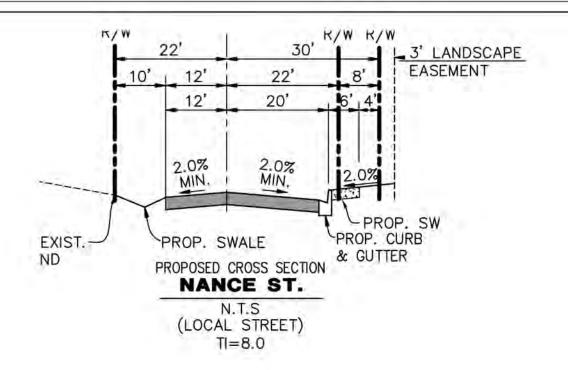
Source(s): Urban Crossroads (10-05-2022)

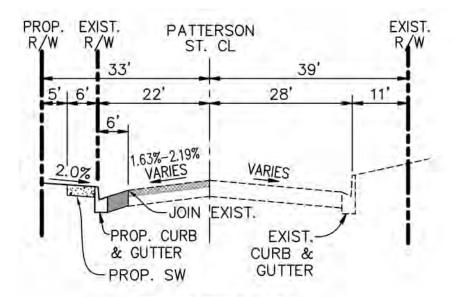
Exhibit 8



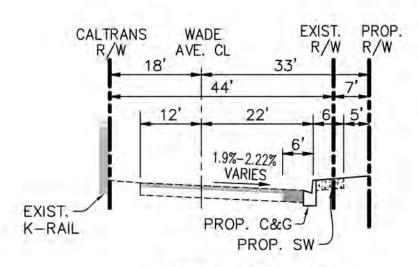








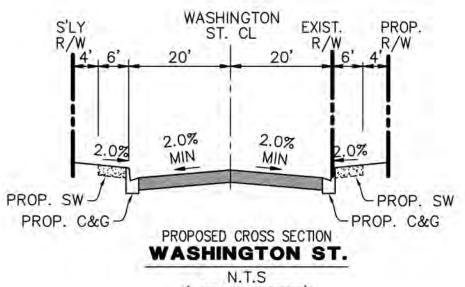
PROPOSED CROSS SECTION PATTERSON AVE. FROM STA 16+12.76 TO STA 19+84.00 N.T.S (COLLECTOR) *TI=9.0



PROPOSED CROSS SECTION

WADE AVE. N.T.S

(COLLECTOR) *TI=8.0



(LOCAL STREET)

TI = 9.0

Source(s): Huitt-Zollars, Inc. (October 2022)



The site access and circulation has been designed such that truck and automobile access do not conflict, and the truck circulation does not interfere with any pedestrian paths of travel. Internal site circulation would comply with applicable City and Riverside County emergency access requirements. The Project's Fire Access Plan is presented on Exhibit 10.

NON-VEHICULAR CIRCULATION

Section 4.2.2.3 of the PVCCSP contains Standards and Guidelines related to pedestrian access and onsite circulation and the Project was designed to comply with applicable Standards and Guidelines. Sidewalks and landscaped parkways would be constructed along Wade Avenue, Washington Street, Patterson Avenue, and Nance Street. The existing Class II Bicycle Lane (onstreet striped) along Patterson Avenue would be accommodated with the proposed site-adjacent roadway improvements, and onsite accommodations for bicyclists, such as bicycle parking, would also be provided, as required, and would encourage this alternative mode of transportation.

PARKING

The Project has been designed to comply with Section 4.2.2.4 of the PVCCSP and Chapter 19.69 of the City of Perris Zoning Ordinance related to parking requirements. As shown on Exhibit 3, automobile parking would be provided in the northwest and southeast corners of the Project site, and along the eastern building perimeter. The truck court, with 59 truck trailer stalls, would be located south of the proposed building. A total of 146 automobile parking stalls, including standard and van American with Disabilities Act (ADA)-compliant stalls would be provided; 123 automobile parking stalls are required. Pursuant to Section 5.106.5.2 of the CALGreen Code, 18 of the parking spaces would be designated for carpool/vanpool vehicles. Pursuant to Section 5.106.5.3.2 of the CALGreen Code, 13 parking spaces would be designated for electric vehicles (EV). Additionally, in compliance with existing requirements, bicycle parking would be provided at the northwestern and southeastern portions of the building.

2.2.3 LANDSCAPING AND AMENITIES, WALLS/FENCES, AND LIGHTING

LANDSCAPING AND AMENITIES

Landscaping would be provided on site, consistent with the Landscape Standards and Guidelines outlined in Section 6.0 of the PVCCSP. As shown on the Conceptual Landscape Plan provided on Exhibit 11 and Exhibit 12, landscaping consisting of trees, shrubs, groundcover, and accents would be provided onsite, primarily along the perimeter of the site and on the sides of the buildings visible to the public. The landscape area would encompass approximately 16.4 percent of the site (approximately 101,363 square feet), exceeding the 12 percent landscape requirement included in the PVCCSP for Light Industrial uses. The proposed landscaping was designed to meet or exceed applicable efficient irrigation requirements and would include, but not be limited to plants with low water usage; a high-efficiency drip irrigation system, with minimal or no overhead spray sprinklers; and an evapotranspiration/weather-based smart controller using daily updated weather data.

The Project would also include PVCCSP-required indoor and outdoor employee amenities, including a covered patio/picnic area and recreational area (bocce ball half-court). Trash enclosures would be provided in the northwest and southeast corners of the Project site; the trash enclosures would be screened as required by the PVCCSP.

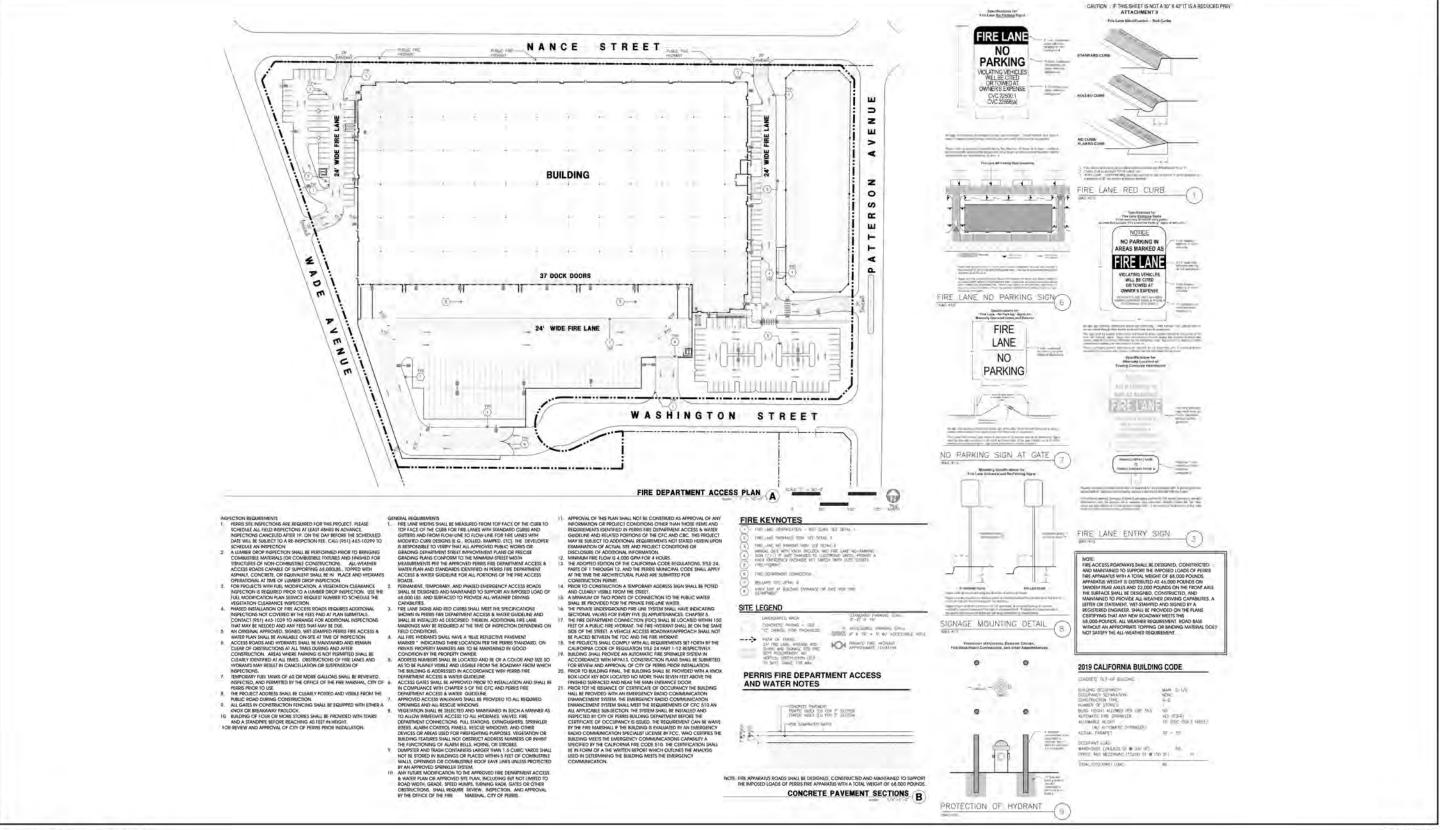
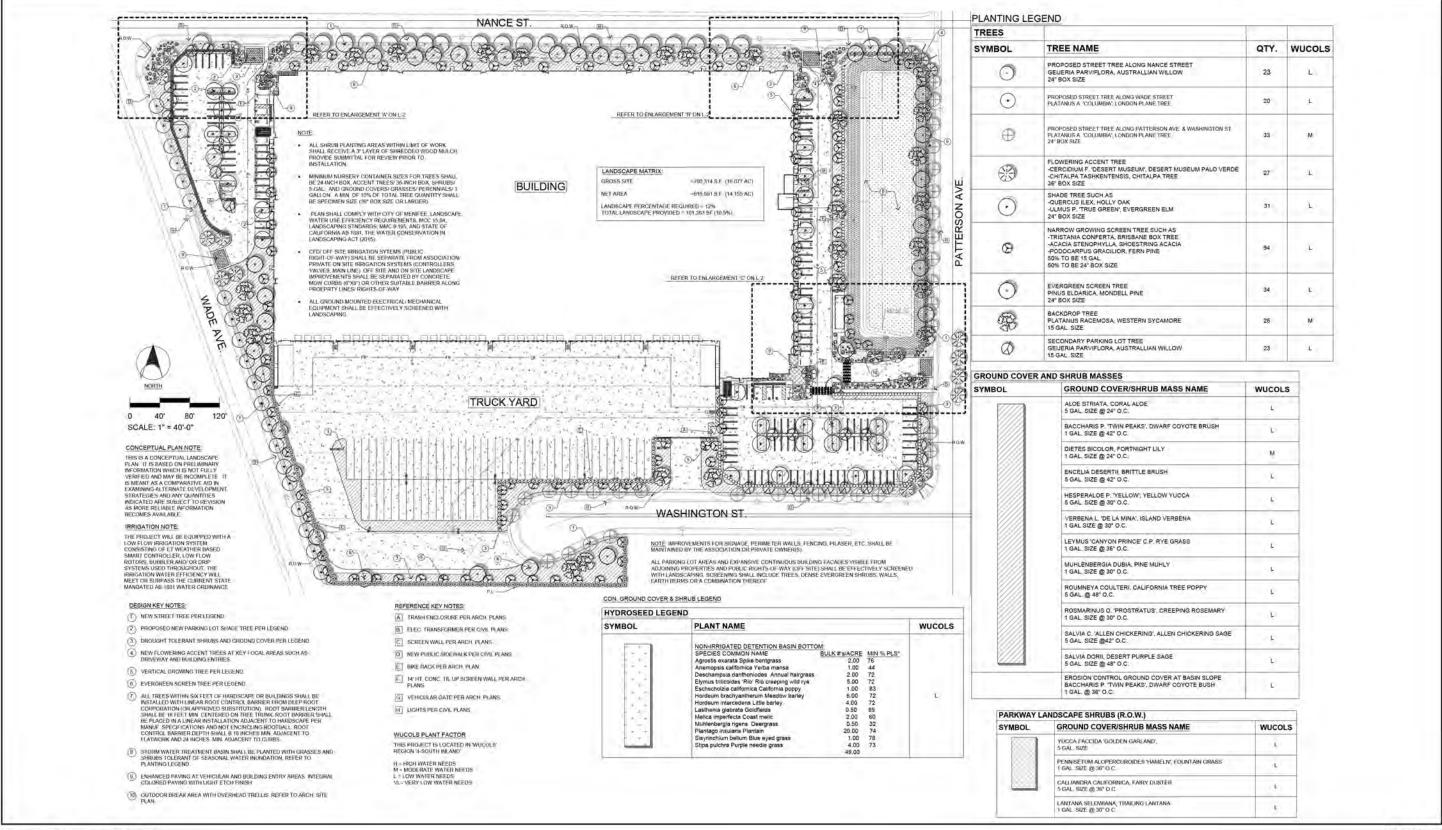


Exhibit 10 Source(s): HPA Architecture (01-30-2023)





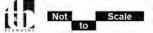




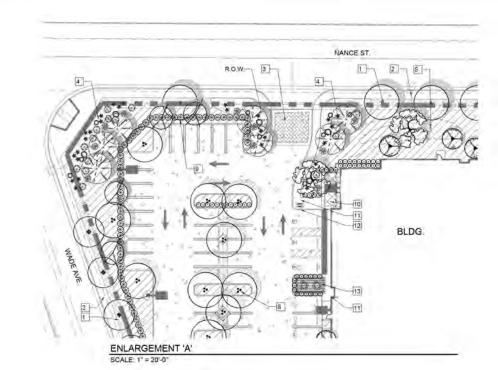
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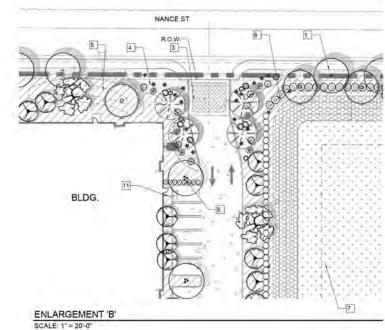


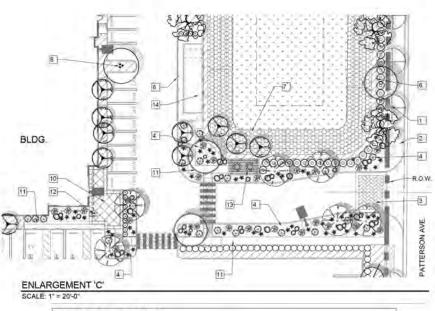


ENLARGEMENT KEY NOTES

- 1. STREET TREE PER PLAN. STREET TREES SHALL SEE PLANTING LEGEND ON L-1
- 2 PUBLIC SIDEWALK PER CIVIL PLANS
- DECORATIVE CONCRETE PAVING AT VEHICULAR ENTRY DRIVES. INTEGRAL COLORED CONCRETE WITH MEDIUM ETCH FINISH
- DECORATIVE CRUSHED ROCK OR STABILIZED DG ACCENT AREAS AT PROJECT ENTRIES
 AND OTHER FOCAL AREAS, SUCCULENT AND ACCENT SHRUB PLANTING IN DG OR
 CRUSHED ROCK AREA IN COMBINATION WITH LARGE BOULDERS
- LANDSCAPE BERMING ALONG STREET FRONTAGE. 3:1 MAXIMUM SLOPE WITH LAYERED GROUND COVER; SHRUBS AND CLUMPING GRASSES
- 6. TUBE STEEL FENCING PER ARCH, PLAN
- 7. STORM WATER TREATMENT BASIN PER CIVIL ENGINEER
- 8. PARKING LOT SHADE TREES, SEE PLANTING LEGEND.
- 9. EVERGREEN SCREEN SHRUBS ADJACENT TO OFF-STREET PARKING AREAS
- 10. DECORATIVE CONCRETE PAYING AT BUILDING ENTRY AREAS, INTEGRAL COLORED CONCRETE WITH MEDIUM ETCH FINISH
- 11. ADA CONCRETE WALKWAY, NATURAL GRAY, MEDIUM BROOM FINISH
- 12. BIKE RACK PER ARCHITECTURE PLAN
- 13. OUTDOOR BREAK AREA WITH OVERHEAD STRUCTURE PER ARCH, PLANS
- 14. PROPOSED BOGGE BALL COURT, ARTIFICIAL TURF

SYMBOL	GROUND COVER/SHRUB MASS NAME	WUCOLS
8	YUCCA FACCIDA 'GOLDEN GARLAND'. 5 GAL SIZE	r e
	PENNISE TUM ALOPERCUROIDES 'HAMELN', FOUNTAIN GRASS I GAL SIZE @ 36" O.C.	L
	CALLIANDRA CALIFORNICA, FAIRY DUSTER 5 GAL SIZE @ 36" D.C.	i.
	LANTANA SELOWIANA, TRAILING LANTANA 1 GAL SIZE Ø 30" O.C.	Ĺ





SYMBOL	SHRUB NAME	WUCOLS
0	AGAVE 'BLUE FLAME' 5 GAL. SIZE	VL
*	AGAVE 'BLUE GLOW', BLUE GLOW AGAVE 5 GAL. SIZE.	VL
99	AGAVE 'MEDIOPICTA ALBA', WHITE-STRIPED CENTURY PLANT	VL

TREES			
SYMBOL	TREE NAME	QTY.	WUCOLS
0	PROPOSED STREET TREE ALONG NANCE STREET GELIERIA PARVIFLORA, AUSTRALLIAN WILLOW 24' BOX SIZE		L
\odot	PROPOSED STREET TREE ALONG WADE STREET PLATANUS A "COLUMBIA", LONDON PLANE TREE	20	k
\oplus	PROPOSED STREET TIRE ALONG PATTERSON AVE & WASHINGTON ST PLATANUS A "COLUMBIA", LONDON PLANE TREE 24" BOX SIZE	33	M
*	FLOWERING ACCENT TREE -CERCIDIUM F. 'DESERT MUSEUM', DESERT MUSEUM PALO VERDE -CHITALPA TASHKENTENSIS, CHITALPA TREE 36' BOX SIZE		E
\odot	SHADE TREE SUCH AS -QUERCUS IEEX, HOLLY OAK -ULMUS P. TRUE GREEN', EVERGREEN ELM 24' BOX SIZE		i i
09	NARROW GROWING SCREEN TREE SUCH AS -TRISTANIA CONFERTA BRISBANE BOX TREE -ACACIA STEMOPHYLLA, SHOESTRING ACACIA -PODOCARPUS GRACILIOR, FERN PINE 50% TO BE 15 GAL. 50% TO BE 24° BOX SIZE		į.
0	evergreen screen tree pinus eldarica. Mondell pine 24' BOX SIZE 34		L
**	BACKDROP TREE PLATANUS RACEMOSA, WESTERN SYCAMORE 15 GAL, SIZE 26		М
Ø	SECONDARY PARKING LOT TREE GELIERIA PARVIFLORA, AUSTRALLIAN WILLOW 23 15 GAL. SIZE		k

SYMBOL	GROUND COVER/SHRUB MASS NAME	WUCOLS
	ALDE STRIATA, CORAL ALDE 5 GAL SIZE @ 24" O.C.	-4-
	BACCHARIS P. "TWIN PEAKS", DWARF COYOTE BRUSH 1 GAL. SIZE @ 42" O.C.	Ľ
	DIETES BICOLOR, FORTNIGHT LILY 1 GAL, SIZE @ 24" O.C.	M
	ENCELIA DESERTII, BRITTLE BRUSH 5 GAL SIZE @ 42" O.C.	L
	HESPERALOE P. "YELLOW, YELLOW YUCCA 5 GAL. SIZE @ 30" O.C.	1
	VERBENA L. 'DE LA MINA', ISLAND VERBENA I GAL SIZE @ 30" O.C.	100
	LEYMUS 'CANYON PRINCE' C.P. RYE GRASS 1 GAL. SIZE @ 36" O.C.	L
	MUHLENBERGIA DUBIA, PINE MUHLY 1 GAL, SIZE @ 30" O.C.	L
	ROUMNEYA COULTERI, CALIFORNIA TREE POPPY 5 GAL @ 48° O.C.	Ĺ
	ROSMARINUS O. 'PROSTRATUS', CREEPING ROSEMARY' 1 GAL. SIZE @ 30" O.C.	L
	SALVIA C. 'ALLEN CHICKERING', ALLEN CHICKERING SAGE 5 GAL SIZE @42" O.C.	L
	SALVIA DORII. DESERT PURPLE SAGE 5 GAL SIZE @ 48° O.C.	L
	EROSION CONTROL GROUND COVER AT BASIN SLOPE BACCHARIS P. "TWIN PEAKS", DWARF COYOTE BUSH 1 GAL. @ 36" O.C.	L

Source(s): HPA Architecture (October 2022)





WALLS/FENCES

The location of proposed walls and fences is identified on Exhibit 13. A 14-foot-high screenwall would be provided along the western, southern, and eastern boundary of the proposed truck court, and 8-foot-high metal gates with screening mesh would be provided at the entrances to the truck court. A 4-foot-high tube steel fence would be installed around the perimeter of storm water basin in the northeast portion of the Project site.

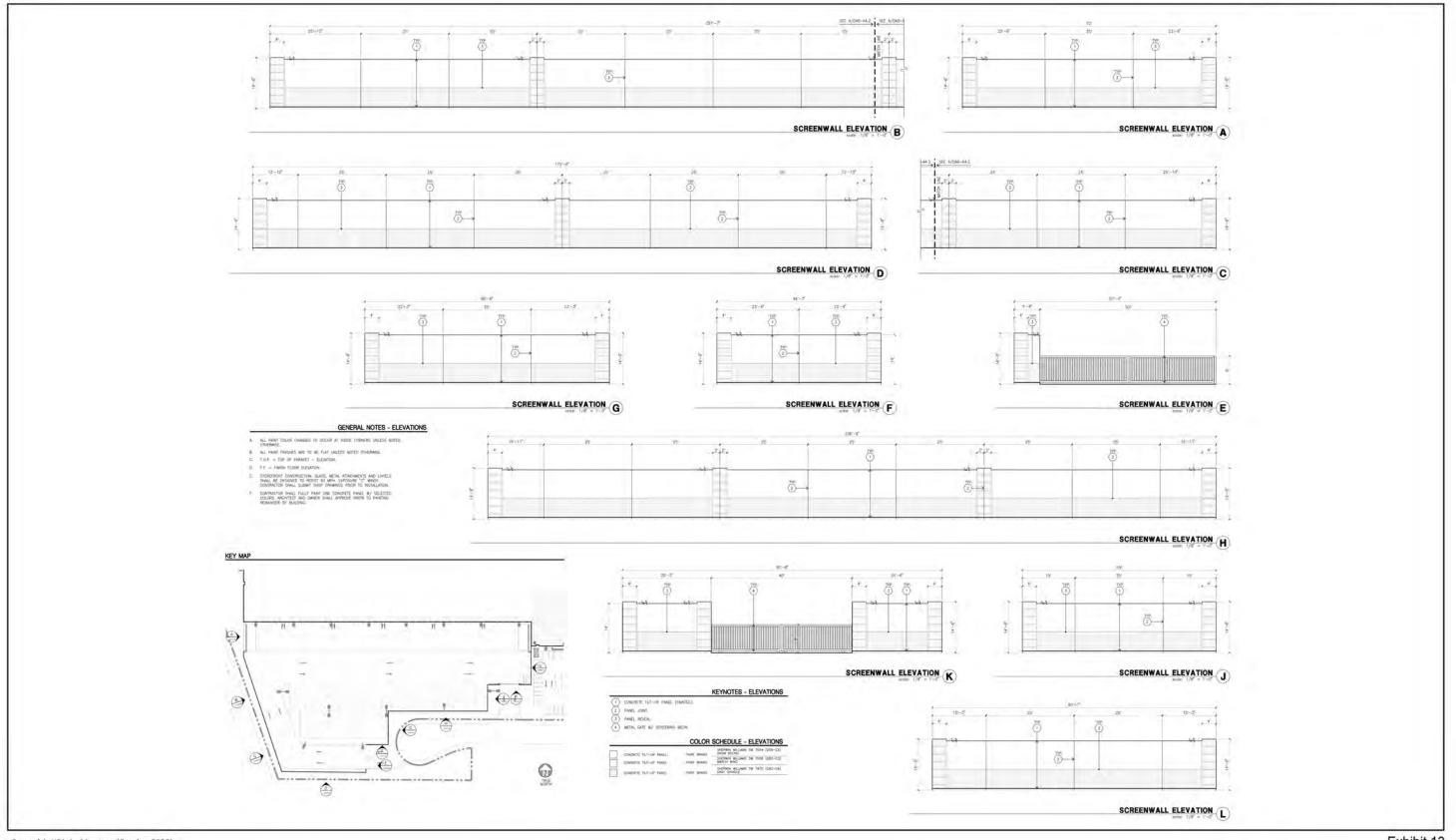
LIGHTING

Section 4.2.4 of the PVCCSP addresses lighting Standards and Guidelines, including general lighting, decorative lighting standards, and parking lot lighting. The Project would comply with applicable lighting Standards and Guidelines, and with lighting standards established by the City of Perris, the CALGreen Code, and the Title 24 Energy Efficiency Standards. The Project would include installation of lighting within the parking areas and loading docks, along walkways, and on the building for safety and security (refer to the conceptual lighting plan provided on (Exhibit 14). A uniform site lighting design would be provided throughout the pedestrian and automobile parking areas, as well as in the secured truck court area. Pursuant to the PVCCSP and the City's Municipal Code Section 19.02.110, lighting would be directed away from adjoining properties and the public right-of-way.

2.2.4 PROPOSED UTILITY INFRASTRUCTURE

Municipal and private utility services necessary to serve the Project are available in adjacent roadways or are available near the Project site. Onsite utility infrastructure necessary to serve the Project (including water, sanitary sewer, drainage, stormwater runoff treatment, and dry utilities) would be installed to serve the proposed development. The final sizing and design of utility infrastructure would occur during final Project design. Following is a description of the existing and proposed utility infrastructure, which is conceptually depicted on Exhibit 15.

- Water. Existing 12-inch Eastern Municipal Water District (EMWD) water lines are located beneath Nance Street and Patterson Avenue and existing 8-inch water lines are located beneath Washington Street and Wade Avenue. As shown on Exhibit 15, the Project would include the extension of the 8-inch water line beneath Washington Street, and the extension of the 12-inch water line beneath Nance Street, which would connect to the existing 8-inch waterline beneath Wade Avenue. A new 2-inch lateral water line for domestic water would be extended from the southeast corner of the proposed building to the existing 12-inch water line in Patterson Avenue. Additionally, the Project Applicant proposes the installation of an 8-inch recycled water line beneath Nance Street extending to Patterson Avenue and then south to connect with the existing 8-inch recycled waterline in Markham Street.
- Sewer. There are no existing sewer lines beneath roadways surrounding the Project site.
 The Project would include the installation of an 8-inch sewer line beneath Nance Street
 towards Patterson Avenue and extending northerly beneath Patterson Avenue to Harley
 Knox Boulevard. A new 6-inch lateral sewer line would be extended from the Project site
 to this new sewer line.
- Storm Drainage and Water Quality Features. The Project's drainage plan, which is shown on the conceptual grading plan (refer to Exhibit 17) was designed so that the Project site generally drains in the same direction as the existing condition (to the east). As shown in Exhibit 16, Post-Construction BMP Site Plan, runoff from the western drive



Source(s): HPA Architecture (October 2022)

Exhibit 13

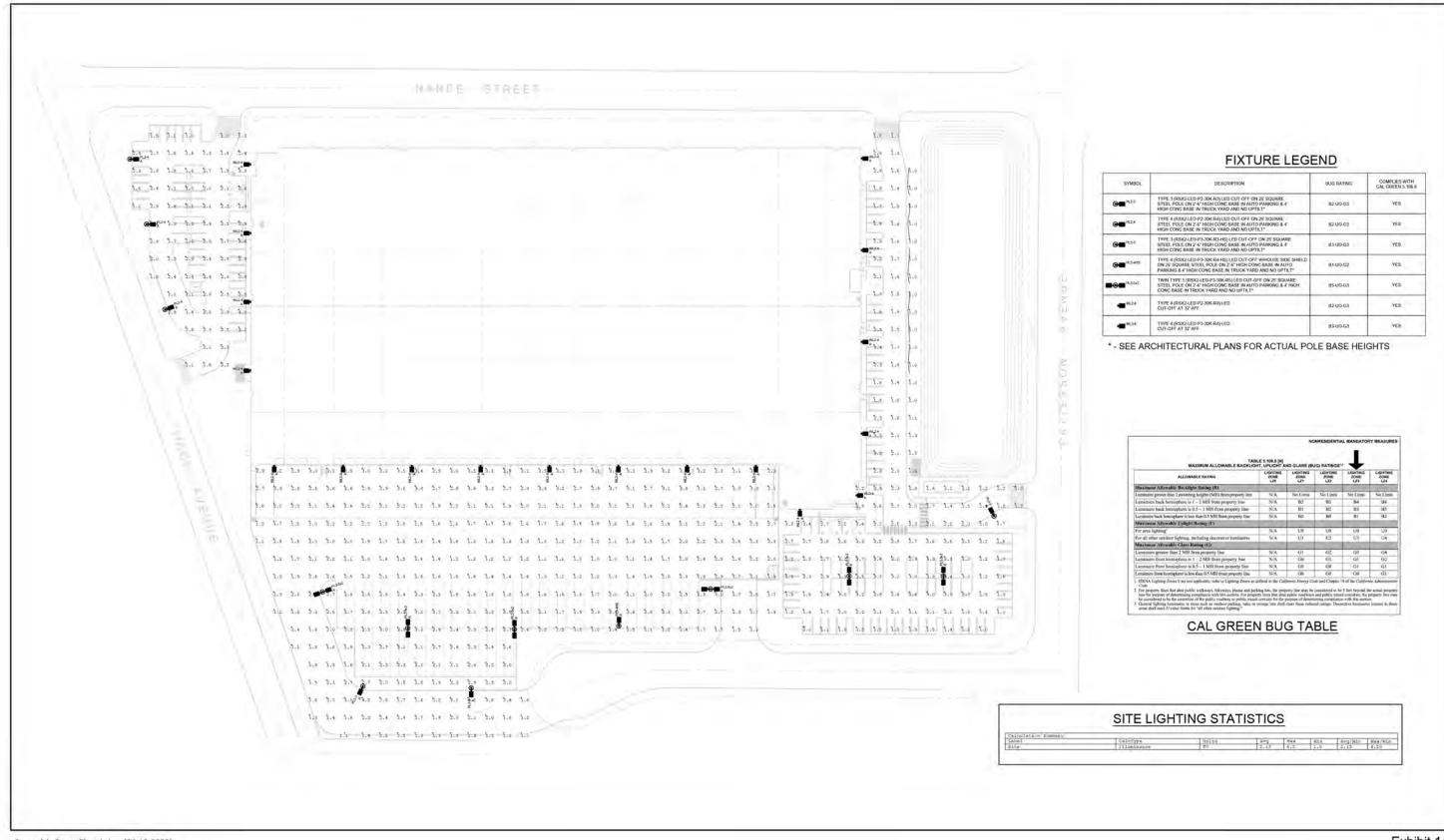
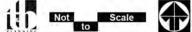
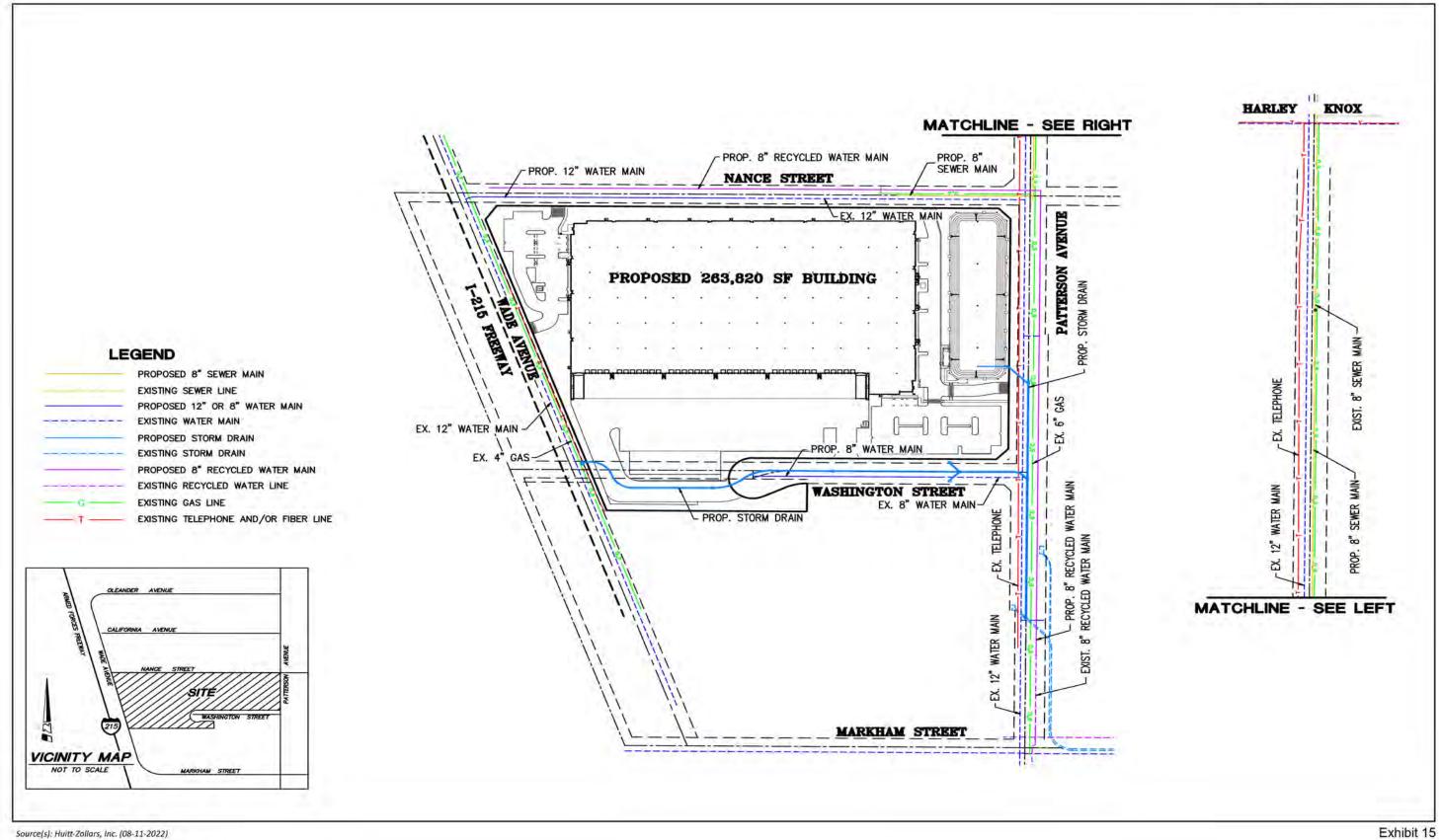


Exhibit 14 Source(s): Gregg Electric Inc. (04-19-2022)









Source(s): Huitt-Zollars, Inc. (08-11-2022)









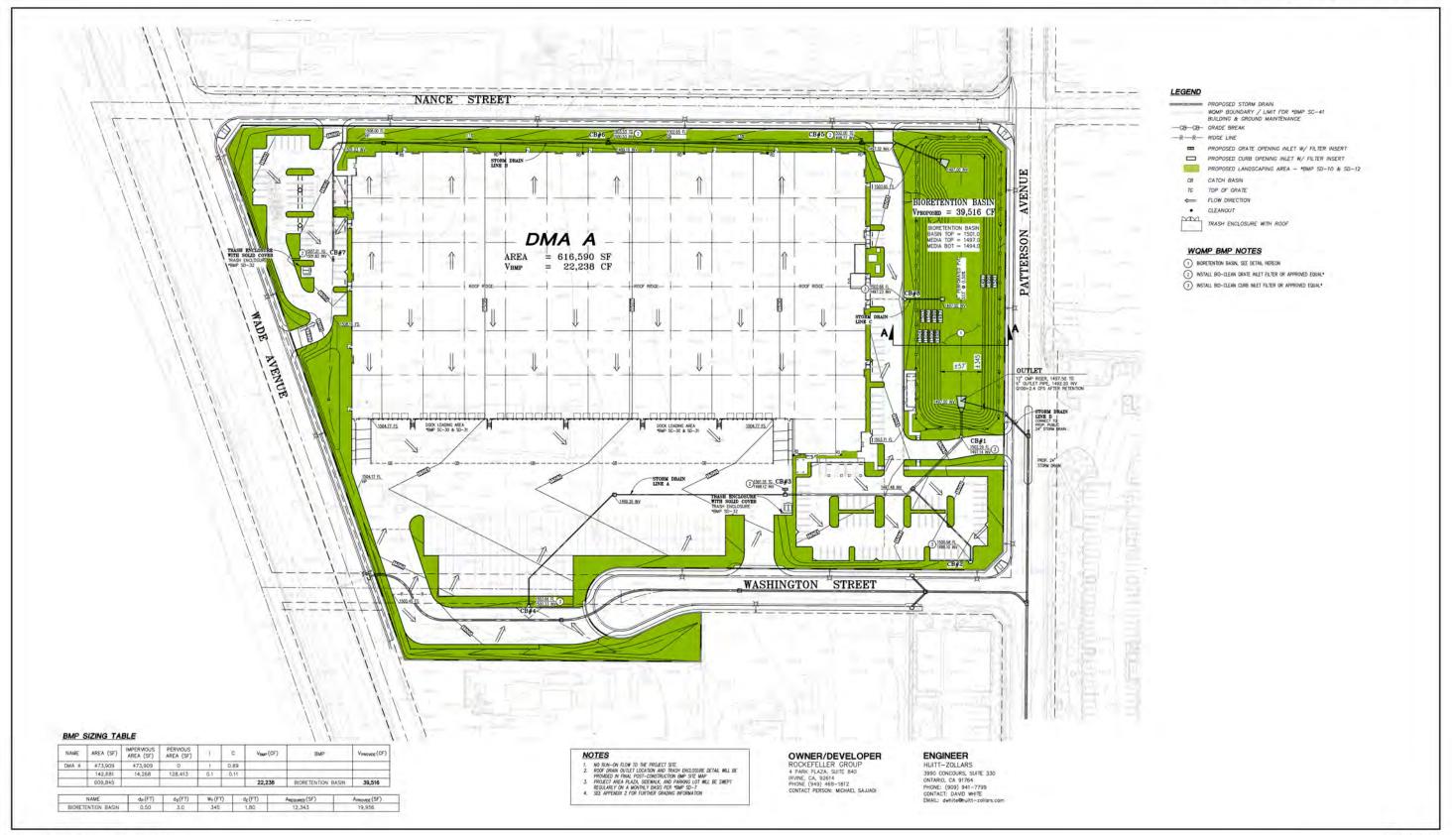
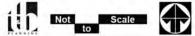


Exhibit 16 Source(s): Huitt-Zollars, Inc. (10-21-2022)







aisle and parking lot, southern half of the roof, truck docks and aisle, southern drive aisle, and southeast parking lot would be intercepted by area drains that would connect to the proposed on-site storm drain line within the truck court (Line A). Additionally, runoff from the northern half of the roof would be intercepted by a proposed on-site storm drain north of the proposed building (Line B). Runoff from the eastern drive aisle and parking lot would be intercepted by an area drain that would connect to a proposed on-site storm drain within the southeastern parking lot (Line C). Runoff from the on-site storm drains would then be directed to an on-site open bioretention basin proposed within the northeast portion of the Project site. The basin outlet would be located 6 inches above the basin bottom. Excess volume beyond the design capture volume would be detained and released at a controlled rate. The outlet size would be restricted to mitigate the peak storm and restrict post-development flow from exceeding predevelopment flow. The overflow from the basin would be collected by a 12-inch riser and flow to a proposed 6-inch line that drains to a proposed 24-inch public storm drain in Patterson Avenue.

There is an existing culvert at the southwest corner of the Project site. As part of the Project, a new 24-inch public storm drain line would be installed in Washington Street and connect to the existing culvert. This storm drain line would be constructed and sized to adequately convey runoff from Wade Avenue and I-215 through Washington Street to Patterson Avenue. Additionally, as part of the Project, a new 18-inch public storm drain system connected to the proposed bioretention basin would be located in Patterson Avenue and sized to adequately convey runoff from the Project site.

With respect to water quality treatment, site drainage would be conveyed to the bioretention area where the runoff would pass through a filter media, stone section, and through a perforated pipe network beneath the basin footprint which would ultimately convey the runoff out to the proposed public storm drain system located in Patterson Avenue. The proposed onsite landscaped areas adjacent to the public street would be self-treating and would surface drain offsite. The proposed landscape planters would overflow and drain to the proposed bioretention basin

• Dry Utilities. Southern California Edison (SCE) supplies electric power to the Project area and Frontier Communications supply communications and data service. The Project would include installation of onsite dry utility infrastructure that is anticipated to connect with the existing infrastructure along Patterson Avenue. SCE has existing electrical facilities along Patterson Avenue south of the Project site. Additionally, there are existing power poles and overhead distribution lines along Wade Avenue that would be removed and undergrounded within the Wade Avenue right-of-way. Frontier Communications has existing telecommunication facilities along Patterson Avenue and the Project would connect to this existing infrastructure. Natural gas use is not anticipated as part of Project operation; however, for purposes of analysis, use of natural gas has been assumed. It is anticipated that electricity will be the source of heat for the office and building space and restroom water for the Project. The Southern California Gas Company (SoCalGas) provides natural gas in the Project area and has an existing 6-inch gas line in Patterson Avenue adjacent to the Project site; connections to this line would be provided if natural gas service is required in the future.

2.2.5 CONSTRUCTION ACTIVITIES

For purposes of analysis in this Initial Study, it is expected that construction of the Project would occur in one phase over an approximate 10-month period (April 2023 to February 2024). The duration of construction activity and associated equipment represents a reasonable

approximation of the expected construction fleet as required per CEQA Guidelines.³ The following construction activities would occur at the Project site (with the estimated duration for purposes of analysis): demolition (approximately 10 days), site preparation (approximately 10 days), grading (approximately 20 days), building construction (approximately 185 days); paving (approximately 20 days), and architectural coating (approximately 40 days).

Construction of the Project would require common construction equipment. The site-specific construction fleet may vary due to specific needs at the time of construction; however, a summary of construction equipment assumptions by construction phase used for purposes of analysis in this Initial Study is provided in Table 2-1. All equipment used during Project construction would meet or exceed California Air Resources Board (CARB) Tier 4 Interim emission standards. Consistent with industry standards and typical construction practices, each piece of equipment is estimated to operate 8 hours per day, or four (4) hours fewer than the 12-hour daily maximum allowed pursuant to the City's Municipal code.

TABLE 2-1 CONSTRUCTION EQUIPMENT ASSUMPTIONS

Construction Activity	Equipment	Amount	Hours Per Day
	Concrete/Industrial Saws	1	8
Demolition	Excavators	3	8
	Rubber Tired Dozers	2	8
O'the December 1	Crawler Tractors	4	8
Site Preparation	Rubber Tired Dozers	3	8
	Crawler Tractors	2	8
	Excavators	2	8
Grading	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
	Cranes	1	8
	Forklifts	3	8
Building Construction	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	8
	Welders	1	8
	Pavers	2	8
Paving	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

Source: (Urban Crossroads, 2023a, Table 3-4)

³ As shown in CalEEMod User's Guide Version 2020.4.0, Section 4.3 "Offroad Equipment", as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

Construction of the Project would involve mass grading of the entire site (refer to the conceptual grading plan provided on Exhibit 17). Estimated earthwork quantities include approximately 52,248 cubic yards (cy) of cut and approximately 52,248 cy of fill; the earthwork would balance onsite and no import or export would be required. Required offsite improvements that would be constructed as part of the Project include completion of roadway and site frontage improvements along Nance Street, Washington Street, and Patterson Avenue, As previously described, utility infrastructure would be installed onsite and would connect to existing and proposed utility lines in the site-adjacent roadways. The Project would also include the installation of a new 8-inch sewer line along Patterson Avenue north of the Project site to a connection with an existing sewer line south of Harley Knox Boulevard, and a new 8-inch recycled water line along Patterson Avenue south of the Project site to a connection with an existing line north of Markham Street. It should be noted that impacts associated with off-site improvements are analyzed in this IS/MND. Construction staging would occur within the Project impact limits and would be located the farthest distance feasible from any existing residential structures. Construction workers would travel to the Project area by passenger vehicle and materials deliveries would occur by medium- and heavyduty trucks.

2.2.6 OPERATIONAL CHARACTERISTICS

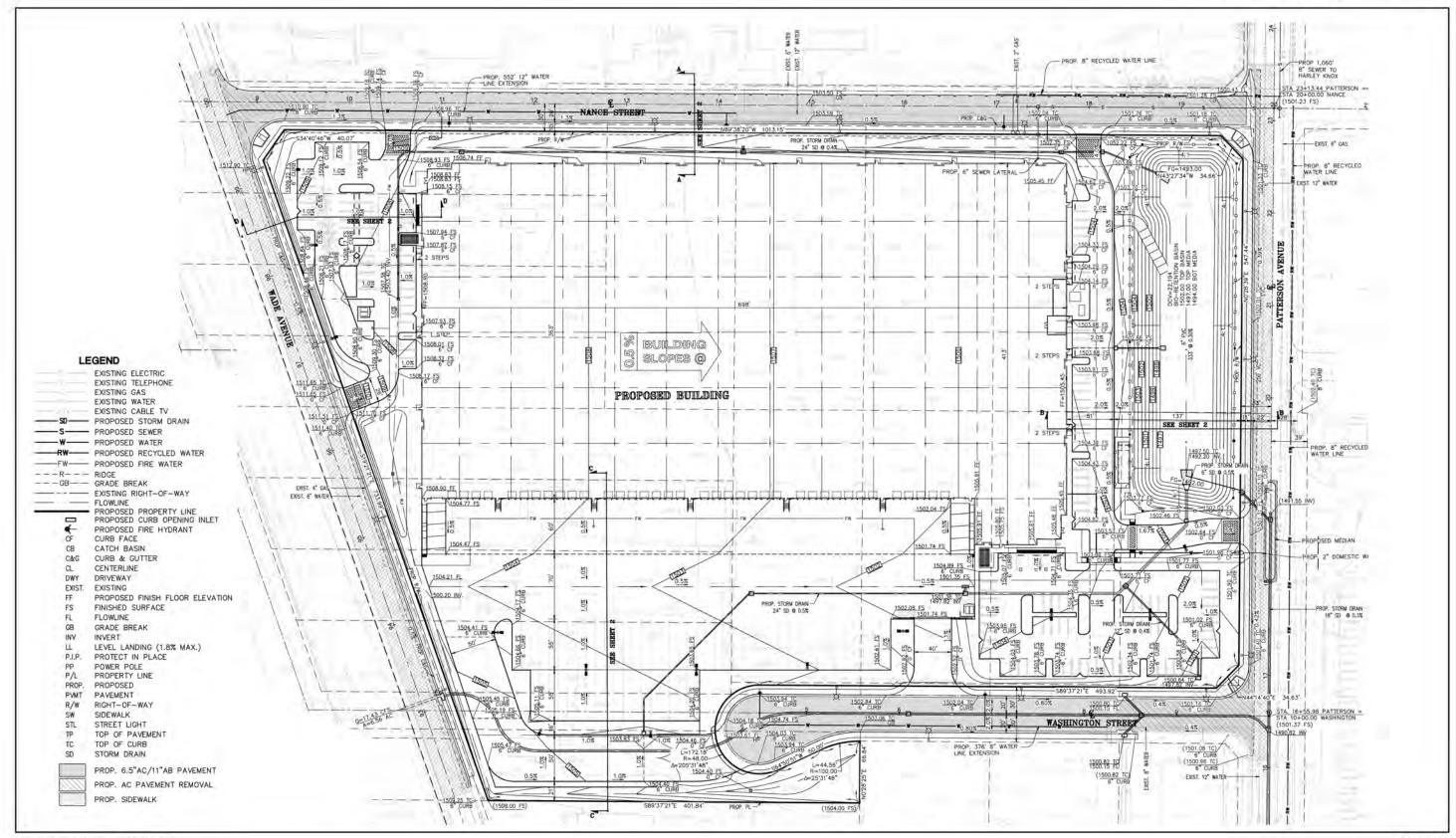
At the time this Initial Study was prepared, the future occupants of the proposed building were unknown. For purposes of analysis in this Initial Study, it is anticipated that the building would be occupied by non-refrigerated high-cube warehouse fulfillment center (90 percent of the total building area, which is 237,438 square feet) and manufacturing space (10 percent of the total building area, which is 26,382 square feet). The manufacturing use onsite would be limited to indoor assembly/manufacturing, and retail related to manufacturing, whereby all uses would be only for non-hazardous materials. The Project is assumed to be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night. As further discussed in Population and Housing section of this Initial Study, it is estimated that the Project would generate approximately 256 employment opportunities.

Project truck traffic would be restricted to Washington Street and Patterson Avenue. Truck traffic would be directed north along Patterson Avenue towards Harley Knox Boulevard, which is a City-designated truck route, to access I-215. Signage would be posted on site directing truck drivers to use the existing City truck routes.

2.3 SUMMARY OF REQUESTED ACTIONS

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

This Initial Study/MND informs state, regional, and local government approvals needed for construction and/or operation of the Project, whether or not such actions are known or are explicitly listed. A list of the anticipated actions under City of Perris jurisdiction is provided in Table 2-2. In addition, additional actions may be necessary from other government agencies to fully implement the Project. Table 2-2 also lists the government agencies that may be required to use



Source(s): Huitt-Zollars, Inc. (10-17-2022)

Exhibit 17







TABLE 2-2 PROJECT RELATED APPROVALS/PERMITS

Public Agency	Approvals and Decisions	
Proposed Project – City of Perris Discre	etionary Approvals	
City of Perris Planning Commission	Adoption of the Mitigated Negative Declaration No. 2375 for the Project in compliance with the requirements of CEQA.	
	Development Plan Review (DPR) to allow for the development of the Project site with an approximately 263,820-square-foot warehouse and manufacturing facility. (Case No. DPR 22-00003)	
	Vesting Tentative Parcel Map (VTPM) No. 38384 to merge 18 existing parcels into one parcel (refer to Exhibit 18). (Case No. 22-05043)	
Subsequent City of Perris Non-discretion	onary Approvals	
City of Perris	 Review and approval of offsite infrastructure plans, including street and utility improvements pursuant to the conditions of approval; 	
	Review all onsite plans, including grading and onsite utilities; and	
	Approval of a Final Water Quality Management Plans (FWQMP) to mitigate post-construction runoff flows.	
Other Agencies – Subsequent Approvals and Permits		
Regional Water Quality Board (RWQCB)	Issuance of a Construction Activity General Construction Permit.	
	Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit.	
Eastern Municipal Water District (EMWD)	Approval of water and sewer improvement plans.	
South Coast Air Quality Management District	Approval of permits to install and operate a diesel fire water pump backup generator.	
Other Utility Agencies	Permits and associated approvals, as necessary for the installation of new utility infrastructure or connections to existing facilities.	

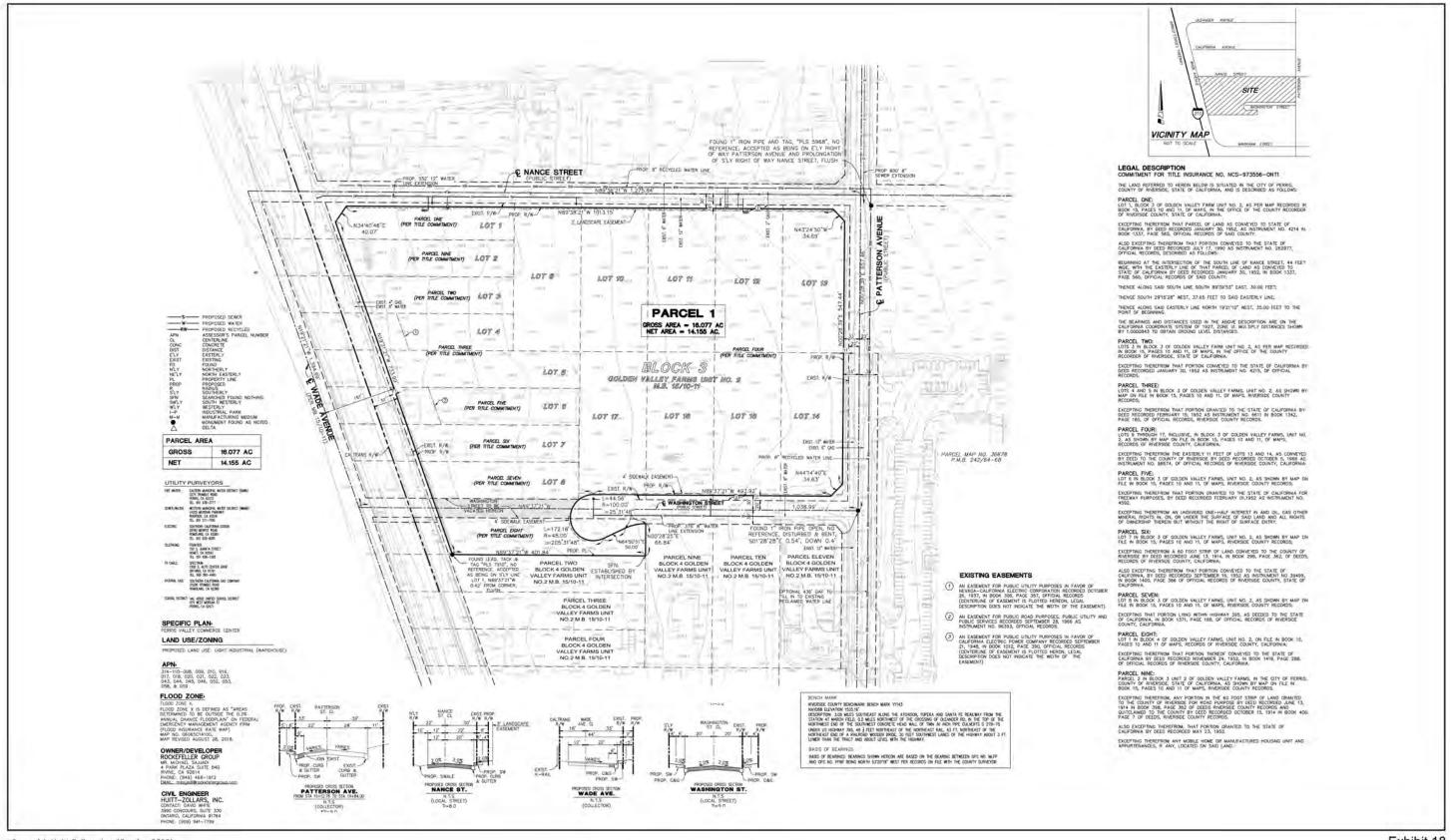


Exhibit 18 Source(s): Huitt-Zollars, Inc. (October 2022)







the Project's 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.

2.4 DOCUMENTS INCORPORATED BY REFERENCE

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

- Perris Comprehensive General Plan 2030, City of Perris, originally approved on April 26, 2005 (Various elements updated in 2022) (Perris, 2005a), (Perris, 2006), (Perris, 2015), (Perris, 2016b), (Perris, 2022a), (Perris, 2022b), (Perris, 2022c)
- Perris General Plan 2030 Environmental Impact Report, SCH No. 2004031135, certified April 26, 2005 (Perris, 2005b)
- Perris Municipal Code for the City of Perris, adopted 1972 and amended through 2022 (Perris, 2022d)
- Perris Valley Commerce Center Specific Plan, adopted January 10, 2012 and amended through January 2022 (Perris, 2022g)
- Perris Valley Commerce Center Final Environmental Impact Report, SCH No. 2009081086, dated November 2011, and certified January 10, 2012 (Perris, 2011)

These reports/studies are available for review at:

General Plan and General Plan EIR:

https://www.cityofperris.org/departments/development-services/general-plan

Perris Municipal Code:

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

Perris Valley Commerce Center Specific Plan and EIR:

https://www.cityofperris.org/departments/development-services/specific-plans

Public Service Counter, City of Perris Planning Division 135 N. D Street, Perris, California 92570

(951) 943-5003; Hours: Monday-Friday, 8:00 AM to 6:00 PM.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

	ast one impact that is "Po		d by the checklist on the following
	Aesthetics	Greenhouse Gas Emissions	☐ Public Resources
	Agriculture and Forestry Resources	Hazards & Hazardous Materials	Recreation
	Air Quality	☐ Hydrology/Water Quality	☐ Transportation
	Biological Resources	☐ Land Use/Planning	☐ Tribal Cultural Resources
	Cultural Resources	☐ Mineral Resources	☐ Utilities/Service Systems
	energy	☐ Noise	☐ Wildfire
	Geology/Soils	☐ Population/Housing	 Mandatory Findings of Significance
DET	ERMINATION		
On th	ne basis of this initial eval	uation:	
		COULD NOT have a significant TION would be prepared.	effect on the environment, and a
	would not be a signification	ant effect in this case because r to by the Project Propone	t effect on the environment, there revisions in the Project have been ent. A MITIGATED NEGATIVE
		t MAY have a significant effe	ect on the environment, and an
	unless mitigated impa adequately analyzed in (2) has been addressed on attached sheets. A	act on the environment, but a n an earlier document pursuant to d by mitigation measures based of	at impact" or "potentially significant to least one effect (1) has been to applicable legal standards, and on the earlier analysis as described REPORT is required, but it must
	all potentially significar NEGATIVE DECLARA or mitigated pursuant to	nt effects (a) have been analyze TION pursuant to applicable stan	ffect on the environment, because of adequately in an earlier EIR or idards, and (b) have been avoided ECLARATION, including revisions ect, nothing further is required.
Signa	ture /		Date
Lupita	Garcia, Associate Planner		City of Perris

SECTION 3.0 INITIAL STUDY

3.1 ENVIRONMENTAL CHECKLIST FORM

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

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

ENVIRONMENTAL CHECKLIST FORM

City of Perris Planning Division 135 N. D Street, Perris, California 92570					
Project Title	Patterson Commerce Center Project (Case No. DPR 22-00003) (Project)				
Lead Agency Name and Address	City of Perris, 135 N. D Street, Perris, California 92570				
Contact Person and Phone Number	Lupita Garcia, Associate Planner, (951) 943-5003 ext. 236				
Project Location	The Project site is located at the southwest corner of the Nance Street/Patterson Avenue intersection, east of Wade Avenue, north of Washington Street, south of Nance Street, and west of Patterson Avenue within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area, in the City of Perris, Riverside County (see Exhibit 1).				
Project Sponsor's Name and Address	RG Patterson, LLC 3161 Michelson Drive, Suite 900 Irvine, CA 92612 Contact: Michael Sajjadi, Vice President of Design & Construction				
General Plan Designation	Specific Plan – Perris Valley Commerce Center Specific Plan				
Zoning	PVCCSP – Perris Valley Commerce Center Specific Plan; designated Light Industrial in the PVCCSP				
Description of Project	Refer to Section 2.2 of this Initial Study. The Project would involve construction and operation of an approximately 263,820-square-foot industrial building to be used for non-refrigerated warehouse, indoor manufacturing, and associated office functions on the approximately 16.1-gross-acre (14.2-net-acre) Project site. Automobile parking spaces would be provided to comply with the off-street parking required by Section 19.69 of the Perris Zoning Ordinance. Refer to the Conceptual Site Plan provided on Exhibit 3.				
	The Project has been designed to be in compliance with the Standards and Guidelines outlined in the PVCCSP. Landscaped streetscapes would be provided along the Project site's frontages with the surrounding roadways and landscaping would be provided on site. The Project would include the installation of wet and dry utility infrastructure systems and roadway improvements on- and off-site to serve the proposed industrial use.				

City of Perris Planning Division 135 N. D Street, Perris, California 92570							
Surrounding Land Uses							
and Setting	Boundary	General Plan and Zoning/Specific Plan Designations	Existing Land Use				
	Eastern	Perris Valley Commerce Center Specific Plan/ Light Industrial	Patterson Avenue vacant/disturbed land and industrial use				
	Northern	Perris Valley Commerce Center Specific Plan/ Light Industrial	Nance Street Industrial uses and non-conforming residential structures with storage yard				
	Southern	Perris Valley Commerce Center Specific Plan/ Light Industrial	Washington Street Industrial uses and non- conforming residential structures				
	venue and 215						
Other public agencies whose approval is required	 Eastern M 	California Regional Water Quality Control Board Eastern Municipal Water District South Coast Air Quality Management District					

1. AESTHETICS

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

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

4.1 Perris Valley Commerce Center Onsite Development Standards

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

4.2 Onsite Standards and Guidelines

4.2.1 General Onsite Project Development Standards and Guidelines

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

4.2.2 Site Layout for Commerce Zones

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

4.2.3 Architecture

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

4.2.4. Lighting

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

4.2.5 Signage Program

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

4.2.6 Walls/Fences

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

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

4.2.9 Visual Overlay Zone Development Standards and Guidelines

• **4.2.9.1 Freeway Corridor:** Orientation; Architectural Enhancements; Rear Building Elevations; Outdoor Storage; Screening; Anti-Graffiti Protection; Signage, Lighting, Windows, Walls/Fences; Billboards; Line of Sight Study.

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

6.1 <u>Onsite Landscape General Requirements</u>

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

6.1.1 Onsite Landscape Screening

- Plant Screening Maturity
- Screenwall Planting
- Trash Enclosures

6.1.2 Landscape in Parking Lots

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

6.1.3 Onsite Plant Palette

6.2 Offsite Landscape General Requirements

6.2.1 Streetscape Landscape

- Arterial
- Local

6.3 Planting Guidelines

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

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

- 8.2 <u>Industrial Development Standards and Guidelines</u>
- 8.2.1 Industrial Site Layout
 - 8.2.1.1 Orientation/Placement: Industrial Operations
 - **8.2.1.4 Employee Break Areas and Amenities:** Outdoor Break Areas; and Additional Amenities for Buildings Exceeding 100,000 S.F.
 - 8.2.1.5 Screening: Truck Courts

8.2.2 Landscape

No Landscape in Screened Truck Courts

EXPLANATION OF CHECKLIST ANSWERS

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

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

The Project site is completely disturbed and includes non-conforming former residential structures recently occupied by an industrial use (no residents). The Project site is relatively flat and is surrounded by developed and undeveloped land. The

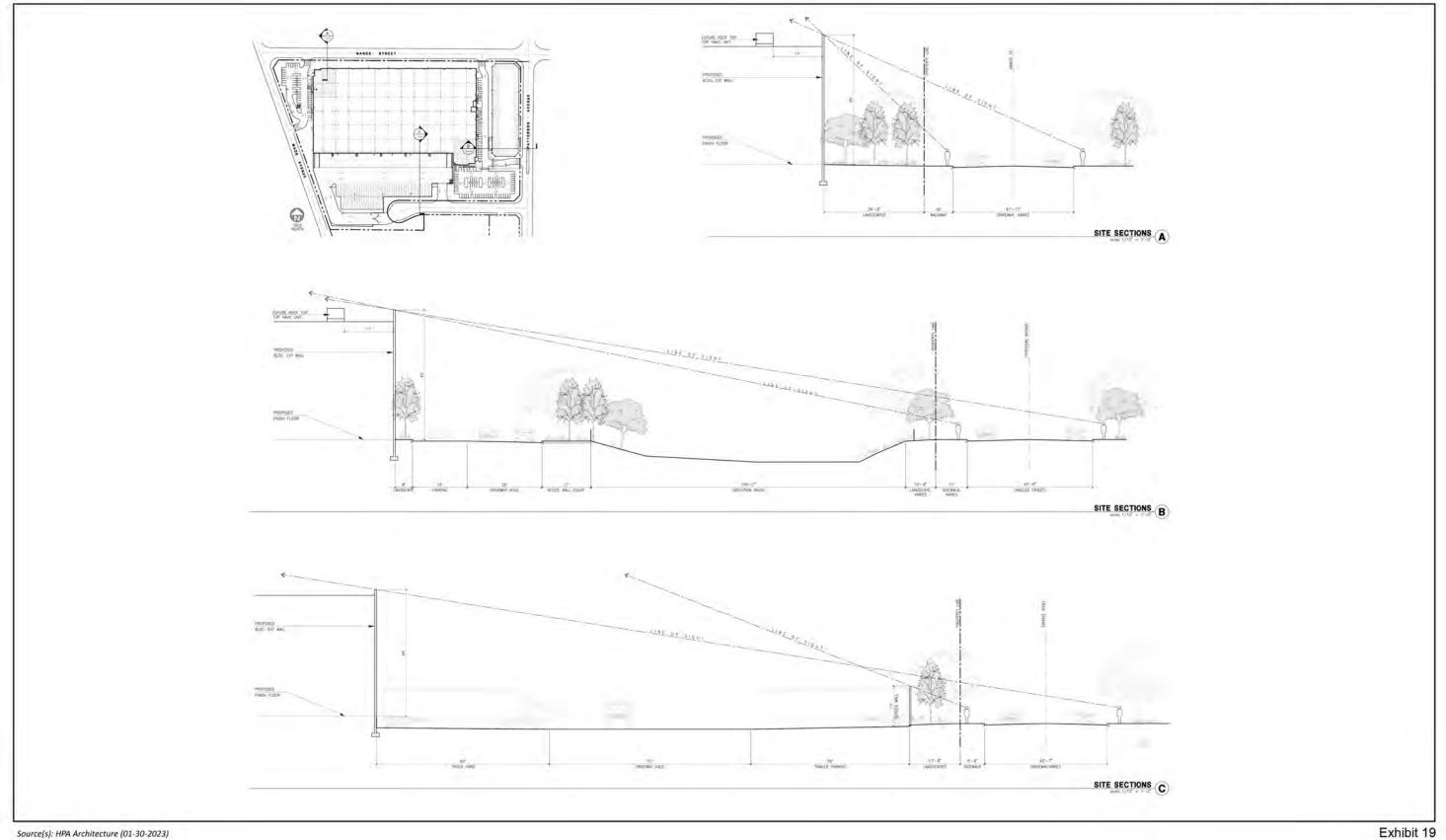
properties to the north, on the north side of Nance Street, are developed and occupied with industrial uses including open yard storage facilities, a shipping facility, a transport facility, a manufacturing facility, a towing facility, and two non-conforming single-family structures with storage yards. The property to the east, on the east side of Patterson Avenue, includes undeveloped land and an existing industrial warehouse use. Properties to the south, on the south side of Washington Street are developed with industrial uses and non-conforming residential structures. Wade Avenue and I-215 are immediately west of the Project site.

The Project site is not located adjacent to a PVCCSP-designated Major Roadway Visual Corridor; however, it is adjacent to the PVCCSP-designated I-215 Freeway Corridor, which is defined as 100 feet from the I-215 right-of-way. Therefore, the Project is required to comply with the PVCCSP Freeway Corridor Development Standards and Guidelines. Additionally, the Project would be developed in compliance with the Standards and Guidelines summarized above and identified in the PVCCSP to address visual character, including but not limited to the following:

- Chapter 4.0, Onsite Design Standards and Guidelines, which addresses building height restrictions and architecture.
- Chapter 4.2.9.1, Freeway Corridor, which is designed to create a sense of arrival into the PVCC planning area, addresses development within 100-feet of I-215, and provides guidelines addressing building orientation toward the freeway, architectural enhancements and rear building elevations, walls and fences, and the requirement for a line-of-sight study.
- Chapter 6.0, Landscape Standards and Guidelines, which provides landscape guidelines that would meet the City's development standards, further reducing the potential for visual impacts.
- Chapter 8.0, Industrial Design Standards and Guidelines, which provides Design Standards and Guidelines for industrial uses.

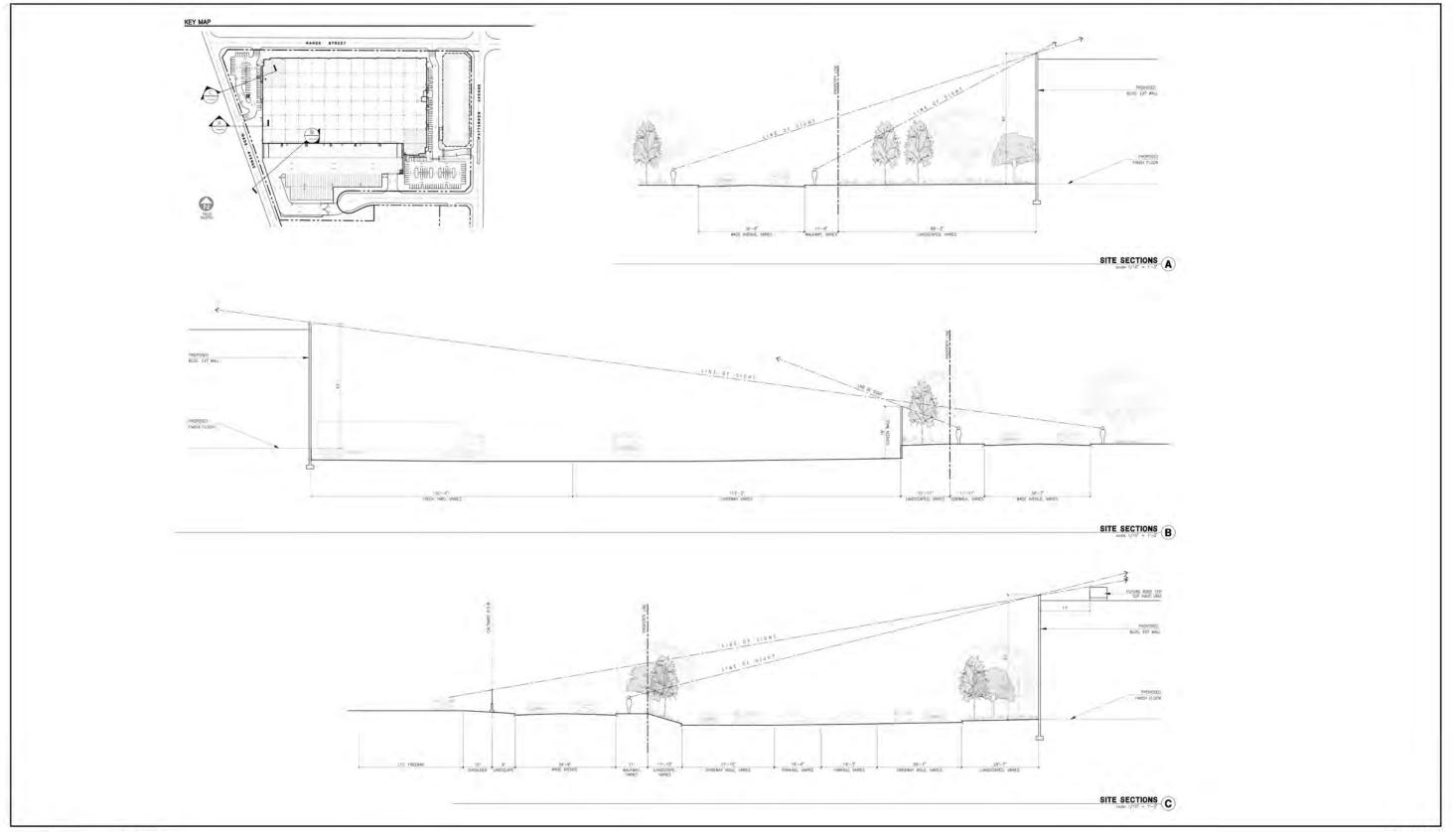
The Project would provide landscaped setbacks along the site-adjacent roadways, and the proposed bioretention basin, which would include perimeter landscaping, would be located along Patterson Avenue. These landscape features would serve to preserve distant views from site adjacent roadways, and primarily Nance Street and Patterson Avenue, which extend in an east-west and north-south direction beyond the Project site. Further, as demonstrated through the light of sight sections provided on Exhibit 19 and Exhibit 20, the Project has been designed to screen the views of rooftop mechanical equipment from adjacent roadways and I-215. The Project would not have a substantial adverse effect on a scenic vista. Impacts would be less than significant.

1b. No Impact. According to the City's General Plan EIR, no notable stands of native trees exist in the City and no impact is associated with development consistent with the General Plan. Further, as identified in the PVCCSP EIR Initial Study (Section 13, Aesthetics), no specific scenic resources such as trees, rock outcroppings, or unique features exist within the PVCCSP planning area, including the Project site. The Project site is not located along a State scenic highway (Caltrans, 2022). The nearest "Officially Designated" State scenic highway is a segment of State Route (SR)-74 east of the City of Hemet, and the nearest Eligible State Scenic Highway (not officially designated) is a segment of SR-74 approximately 8.0 miles south of the Project site

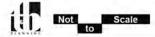


Source(s): HPA Architecture (01-30-2023)





Source(s): HPA Architecture (01-30-2023)



that extends from Hemet to the coast (Caltrans, 2022). Therefore, due to distance, development of the Project would not impact scenic resources within a State scenic highway corridor.

Initial Study (Section 13, Aesthetics), development of future projects in the PVCCSP planning area in compliance with the provisions of the PVCCSP, including the Project, would change the visual character of the individual sites and the PVCCSP planning area as viewed from surrounding vantage points. Exhibit 21 through Exhibit 25 present photographs that depict the existing visual character of the Project site and surrounding area. These photographs were taken from vantage points along the perimeter of the Project site. Existing public views of the Project site are limited to views from the existing site-adjacent roadways (Wade Avenue, Patterson Avenue, and Nance Street). There is not a substantial number of people that have views of the site from these roadways; viewers would be limited to motorists and other individuals traveling along these roadways in the vicinity of the Project site.

Photographs presented on Exhibit 21 depict the visual character of the Project site from vantage points at the northwest corner of the Project site and are representative of existing public views from vantage points near the Wade Avenue/Nance Street intersection looking south and southeast. As shown, the Project site in the foreground is relatively flat with limited vegetation and chain-link fencing along the northern perimeter. View 1 provides views looking south along Wade Avenue and depicts the relationship of the Project site to I-215. Mature trees, chain-link fencing along the western perimeter of the Project site, on-site storage, and billboards and screened fencing along I-215 are visible. Existing development, and distant views of the Bernasconi Hills are visible from View 2.

Exhibit 22 includes photographs that depict views from Nance Street, north of the Project site, which are representative of public views from this roadway. View 3 depicts the disturbed portion of the Project site in the foreground, with chain-link fencing and truck trailer being stored onsite in the foreground, and mature trees and onsite development in the background. View 4 depicts the view looking west along Nance Street; this photo depicts the relationship of the Project site to the existing development north of the Project site. As shown in View 4, truck trailers are onsite and chain-link fencing is provided along the northern perimeter of the Project site. Existing mature vegetation located on properties north of the Project site are a visual feature from this vantage point. Overhead transmission lines are visible along the north side of Nance Street.

Exhibit 23 depict the visual character of the Project site from vantage points at the northeast corner of the Project site and are representative of existing public views from the Patterson Avenue/Nance Street intersection looking southwest and south. View 5 depicts the view looking southwest at the Patterson Avenue/Nance Street intersection and as shown, truck trailers located onsite and chain-link fencing are visible in the foreground and existing industrial development, mature trees, and partially obstructed natural landforms are visible in the background. View 6 depicts views along Patterson Avenue. As shown, truck trailers are visible onsite and distant obstructed views of natural landform are visible in the background Undeveloped land, transmission lines, and an existing industrial warehouse building along the east side of Patterson Avenue are also visible. Exhibit 24 includes photographs that depict views representative of public views from the intersection of Patterson Avenue and Washington Avenue. View



View 1: View from the Northwest corner of the Project Site at the intersection of Nance St and Wade Ave looking South.



View 2: View from the Northwest corner of the Project Site at the intersection of Nance St and Wade Ave looking Southeast.





View 3: View from North of the Project Site along Nance St looking South.



View 4: View from the Northeast corner of the Project Site at the intersection of Nance St and Patterson Ave looking West.





View 5: View from the Northeast corner of the Project Site at the intersection of Nance St and Patterson Ave looking Southwest.



View 6: View from the Northeast corner of the Project Site at the intersection of Nance St and Patterson Ave looking South.





View 7: View from the Southeast corner of the Project Site at the intersection of Patterson Ave and Washington St looking North.



View 8: View from the Southeast corner of the Project Site at the intersection of Patterson Ave and Washington St looking Northwest.





View 9: View from the Southwest corner of the Project Site along Wade Ave looking North/Northwest.



View 10: View from the Southwest corner of the Project Site along Wade Ave looking North/Northeast.



7 depicts views along Patterson Avenue looking north. Truck trailers being stored onsite are visible in the foreground, along with street trees planted as part of the industrial development to the east. Existing transmission lines and distant obstructed mountain views are also visible. View 8 depicts the view looking northwest into the Project site; truck trailers and chain-link fencing are visible.

Exhibit 25 includes photographs from the southwest corner of the Project site representative of existing views from Wade Avenue. View 9 depicts the view looking north along Wade Avenue and depicts the relationship between the Project site and I-215. Existing mature trees onsite along Wade Avenue and screened chain-link fencing along I-215 are prominent visual features from this view. View 9 depicts the view looking northeast into the Project site; this view is obstructed due to screened chain-link fencing; however, distant, partially obstructed views of the Bernasconi Hills are provided from this vantage point.

Development of the Project would involve the construction and operation of the following in an area that is currently partially developed and utilized for truck trailer storage: an approximately 263,820-square-foot industrial building and associated truck trailer and automobile parking, landscaping, walls/fences, roadways, and infrastructure. Implementation of the Project would result in a permanent change in the visual character of the site from its current disturbed/partially developed condition to a developed industrial warehouse use, consistent with the change in visual character anticipated and analyzed in the PVCCSP EIR. The site would be developed in compliance with the Standards and Guidelines outlined in the PVCCSP. As identified above, Section 4.2.3 of the PVCCSP provides onsite Standards and Guidelines specifically related to architecture. As shown on Exhibit 5, which provides conceptual building elevations, the proposed building has been designed to comply with these requirements, including scale, massing, and building relief; architectural elevations and details; roofs and parapets; and color and materials.

As shown on Exhibit 5, development of the Project would involve the construction of a single industrial building with a maximum height of 46 feet and 6 inches. The building was designed with multiple areas of geometric form to provide variation in building plane and form. Visual relief from massive building form would be achieved through fenestration, through the incorporation of windows, and/or through variations in height and rooflines as well as the use of parapets. These various architectural elements would effectively avoid monotony and repetition in building elevations.

As shown on Exhibit 11, landscaping would be installed along the perimeter of the Project site, in the automobile parking areas, and along the perimeter of the bioretention basin in the northeast portion of the Project site. The landscaping would provide a visual buffer between the surrounding public roadways and the proposed building and would help to visually screen views of proposed screenwalls and passenger parking and truck trailer parking areas.

The Standards and Guidelines outlined in the PVCCSP EIR identified previously have been developed to ensure aesthetic cohesiveness and superior architectural design and to improve the visual character within the PVCCSP planning area. The Project would be developed in compliance with these Standards and Guidelines and would be visually consistent with existing industrial development in the vicinity of the Project site.

Therefore, although the Project would alter the site, it would not conflict with applicable zoning and other regulations governing scenic quality. This impact would be less than significant, and no mitigation is required.

1d. Less than Significant with Mitigation Incorporated. As identified in the PVCCSP EIR Initial Study (Section 13, Aesthetics), implementation of allowed development within the PVCCSP planning area, including the Project, would introduce new sources of nighttime light and glare into the area from street lighting as well as outdoor lighting from Project-related uses. The southwest corner of the Project site is currently developed; however, there is limited existing artificial light. The northwestern and eastern portions of the Project site do not have sources of artificial light. Additional existing sources of light in the area include artificial lighting from the surrounding land uses in the form of exterior lighting. No buildings or other man-made features currently exist on site or near the Project site that are constructed of materials that cause substantial glare.

Construction and operation of the Project would introduce additional sources of lighting to the Project site. Lighting during construction could be provided throughout the night for security purposes. New permanent sources of light for operations would be introduced into the area in the form of signage, building lighting, and parking lot lighting for nighttime operations, security, and safety. Lighting in loading areas (areas generally directed away from the public view) would consist of building-mounted lighting as shown on Exhibit 14.

The Project site is within Zone B (15 – 45-mile radius) of the Mount Palomar Lighting Zone; specifically, the Project site is located approximately 40 miles northwest of Mount Palomar. Lighting at the Project site would be designed pursuant to the City's Municipal Code Section 19.02.110, which includes requirements for installation of energy-efficient lighting as well as shielding of parking lot lights to minimize spillover onto adjacent properties and right-of-way. The Project would also comply with lighting requirements contained in the PVCCSP, and in the PVCCSP EIR. Notably PVCCSP EIR mitigation measure MM HAZ 3, further discussed the Hazards and Hazardous Materials section of this Initial Study, requires that outdoor lighting be hooded or shielded to prevent the spillage of lumens or reflection into the sky or above the horizontal plane, to avoid impacts to operations at the MARB/IPA. Therefore, although the Project would introduce new lighting to the Project vicinity, the Project would comply with existing policies, and would not create a new source of substantial light. This impact would be less than significant, and no mitigation is required.

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

Glare is caused by light reflections from pavement, vehicles, and building materials such as reflective glass and polished surfaces. During daylight hours, the amount of glare depends on intensity and direction of sunlight. Glare can create hazards to motorists and can be a nuisance for pedestrians and other viewers. The PVCCSP Standards and Guidelines related to colors and materials (Section 4.2.3.5) encourage

the use of low-reflectant facades and prohibit metal siding where visible from the public. Allowed building materials generally include wood, brick, native stone, and tinted/textured concrete. As identified in the building elevations presented on Exhibit 5, exterior surfaces of the proposed building would be finished with a combination of architectural coatings, trim, and/or other building materials (e.g., concrete). Windows would consist of low-reflective glass. Compliance with the requirements in the PVCCSP related to building materials would ensure that glare does not create a nuisance to on- and offsite viewers of the Project site. The Project would not create a new source of substantial glare. This impact would be less than significant, and no mitigation is required.

Further, as identified in Section 12.1.3, Compatibility with March ARB/IPA 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. The Project does not include any use that would reflect sunlight towards an aircraft. Although the installation of solar photovoltaic (PV) panels are not currently proposed or required, as identified in Section 3.0, Project Description, of this IS/MND, the roof structure for the proposed building would be designed to accommodate solar PV panels. Therefore, a Solar Glare Analysis was performed by Johnson Aviation Consulting and is included in Appendix N of this IS/MND (Johnson Aviation, 2022). The findings of the Solar Glare Analysis demonstrate that a solar PV installation could be installed over the entire warehouse portion of the roof area for the proposed industrial building, and would pass the Federal Aviation Administration (FAA)'s recommended solar glare tests, and pass these same tests for four critical flight paths required by the MARB. Therefore, the Project would not impact aircraft traveling to or from MARB/IPA due to glare from solar PV panels, should they be installed in the future.

PROJECT-LEVEL MITIGATION MEASURES

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

2. AGRICULTURE AND FORESTRY RESOURCES

Wo	ould the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				\boxtimes

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	uld the Project:				
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))?				\boxtimes
d)	Result in the loss of forest land or conversion of forest land to non-forest use?				
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

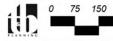
- 2a. No Impact. The California Department of Conservation (DOC) Office of Land Conservation publishes a Farmland Conversion Report every two years as part of its Farmland Mapping and Monitoring Program (FFMP); these reports document land use conversion by acreage for the majority of the counties in California. The most recent FMMP data available for Riverside County is for the 2016-2018 period. As shown on Exhibit 26, the approximately 16.1-gross- acre Project site includes land designated as "Urban and Built-up Land" (DOC, 2018). Urban and Built-up Land is not among the three FMMP categories considered "Farmland" or "agricultural land" under CEQA (i.e., Prime Farmland, Unique Farmland, Farmland of Statewide Importance pursuant to Section 21060.1 of the CEQA Statute). As such, the Project would not result in the direct conversion of Farmland as designated by the FMMP to non-agricultural use. The designations of surrounding lands and potential for indirect conversion of agricultural land are discussed under Threshold 2e below. No impacts related to this issue would occur with implementation of the Project and no mitigation is required.
- 2b. No Impact. As identified in the City's General Plan, no agricultural zones are identified by the City for the Project site or any of the surrounding properties. With the adoption of the PVCCSP and certification of the PVCCSP EIR, the Project site's underlying zoning designation became "Specific Plan" with an underlying Specific Plan land use designation of "Light Industrial." Land use designations envisioned under the PVCCSP do not include any agricultural land uses. Because the Project site is not zoned for agricultural uses, implementation of the Project would not conflict with existing zoning for agricultural uses. Also, according to the PVCCSP EIR, only parcels located within the Perris Valley Agricultural Preserve No. 1 of the PVCCSP contain an active Williamson Act Contract. Based on PVCCSP EIR Figure 4.1-2, Agricultural Preserves, the Project site is not within the Perris Valley Agricultural Preserve No.1 and is

therefore not covered under a Williamson Act Contract (Perris, 2005b). Moreover, the preliminary title report for the Project does not include the existence of a Williamson Act contract encumbering the property's title. Therefore, implementation of the Project would not conflict with any Williamson Act Contract. No impacts related to this issue would occur with implementation of the Project and no mitigation is required.

- **2c-2d. No Impact.** The City of Perris does not have any existing forest lands or zoning for forest lands or timberland (Perris, 2022e). Therefore, the Project would not conflict with existing forest zoning, cause rezoning of forest land, or result in the loss or conversion of forest lands to non-forest uses, as no such resources exist in the City. No impacts associated with this issue would occur and no mitigation is required.
- 2e. No Impact. As discussed under Thresholds 2c-2d, no forest lands or timberland resources exist in the City. Therefore, the Project would not indirectly result in the conversion of forest land. As discussed under Threshold 2a above, the FMMP map indicates the site is composed of Urban and Built-up Land (DOC, 2018). The approximately 16.1-gross-acre Project site and site-adjacent areas that would be subject to roadway and streetscape improvements are not being used for agricultural uses. As shown on Exhibit 26, surrounding parcels are designated as Urban and Builtup Land. The nearest Farmland parcel, as defined under CEQA, is Prime Farmland, located approximately 0.4 mile east of the Project site (DOC, 2018). All areas surrounding the Project site, except for the I-215, are within the PVCCSP planning area in the City of Perris. Goal I-Agricultural Resources in the City's General Plan Conservation Element calls for the "orderly conversion of agricultural lands to other approved land uses." The Project is a logical extension of the existing development in the area and has been planned by the City for a number of years. The City has been planning for the orderly conversion of all agricultural lands within City boundaries since 1991, when the City deleted, due to economic realities, agricultural uses as a permitted use within City boundaries. In addition, none of the lands adjacent to the Project site are designated for agricultural use in the City's General Plan or Zoning Map. The PVCCSP EIR and the City's 2005 General Plan EIR determined that the conversion of agricultural land within the City would result in less than significant impacts due to the elimination of all agricultural land use designations in the 1991 General Plan and by designating all lands within the City for a future urban non-agricultural use during the City's 2005 update to the General Plan. Future conversion of parcels in the PVCCSP planning area, including the Project site, from agricultural uses and/or designated Farmland would be consistent with the objectives of the Specific Plan and the impacts captured in the PVCCSP EIR and the City's General Plan EIR. For this reason, in addition to the lack of designated Farmland in the Project vicinity, implementation of the Project would not involve other changes in the existing environment that could result in conversion of Farmland to non-agricultural use. The Project would not indirectly result in the conversion of Farmland. No impacts related to this issue would occur and no mitigation is required.



Source(s): Esri, Nearmap Imagery (2022), RCTLMA (2021)





3. AIR QUALITY

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

PVCCSP EIR mitigation measures MM Air 1 and MM Air 10 (stated below) require the preparation of project-specific air quality analyses to determine whether projects implementing the PVCCSP would result in construction-related or operational air quality impacts. PVCCSP EIR mitigation measure MM Air 15 (stated below) requires facility-specific health risk assessments to be prepared for projects that generate a minimum 100 truck trips per day or have more than 10 dock doors for a single building. These required analyses have been conducted in the following technical reports, and are provided in Appendix A and Appendix B, respectively, of this Initial Study: Patterson Commerce Center Air Quality Impact Analysis (Air Quality Impact Analysis) (Urban Crossroads, 2023a) (March 27, 2023) and Patterson Commerce Center Mobile Source Health Risk Assessment (HRA) (March 27, 2023) (Urban Crossroads, 2023b). In addition, PVCCSP EIR mitigation measure MM Air 18 (stated below) requires project developers to contact the Riverside Transit Agency (RTA) prior to project approval to determine if the RTA has plans for the future provision of bus routing within any street that is adjacent to the project site that would require bus stops at the project access points. The RTA was contacted regarding its plans for the future provision of bus routing adjacent to the Project site that could require bus stops at the Project boundaries. The RTA indicated that it currently has no plans to implement bus routes on the streets surrounding the Project site. Therefore, the Project has also complied with PVCCSP EIR mitigation measure MM Air 18.

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

MM Air 15

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

MM Air 18

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

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

MM Air 2

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

MM Air 3

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

- requiring the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain),
- · keeping disturbed/loose soil moist at all times,
- requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered,
- installation of wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip,
- posting and enforcement of traffic speed limits of 15 miles per hour or less on all unpaved potions of the project site,
- suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 miles per hour,
- appointment of a construction relations officer to act as a community liaison concerning onsite construction activity including resolution of issues related to PM₁₀ generation,
- sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks when sweeping streets to remove visible soil materials.
- replacement of ground cover in disturbed areas as quickly as possible.

MM Air 4

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

MM Air 5

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

MM Air 6

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

MM Air 7

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

MM Air 8

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

MM Air 9

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

MM Air 11

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

Implementation of the following mitigation measure is required; however, for purposes of analysis, the estimated Project-generated emissions presented in the Project air quality analysis do not reflect emission reductions that would occur with implementation of these mitigation measures since emissions reductions from these measures are not readily quantifiable.

MM Air 13

In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD's Carl Moyer Program, or other State programs that restrict operations to "clean" trucks, such as 2007 or newer model year or 2010 compliant vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential

areas. If trucks older than 2007 model year would be used at a facility with three or more dock-high doors, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP [On-road Heavy Duty Voucher Incentive Program], HVIP [Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project], and SOON [Surplus Off-Road Opt-in for NO_X] funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants would be required to use those funds, if awarded.

MM Air 14

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

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

PROJECT DESIGN FEATURES

Consistent with PVCCSP EIR mitigation measure MM Air 6, the Project Contractor would use construction equipment that exceeds Tier 3 standards with available CARB verified or USEPA certified technologies. Specially, the Project contractor would use equipment that is CARB Tier IV certified or better. The following Project Design Feature (PDF), which would reduce construction-related air pollutant emissions, would be included in the Project mitigation monitoring and reporting program and will be made a condition of approval:

PDF 3-1 Prior to issuance of demolition or grading permit, whichever occurs first, the City of Perris shall verify that the following note is included on the grading plans and building plans. Project contractors shall be required to ensure compliance with this note and permit periodic inspection of the construction-site by City of Perris staff or its designee to confirm compliance. This note also shall be specified in bid documents issued to prospective construction contractors.

 During construction activity, Project construction contractors shall ensure that all off-road diesel construction equipment shall be California Air Resources Board (CARB) Tier IV certified or better and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications.

EXISTING CONDITIONS

As detailed in the Air Quality Impact Analysis included in Appendix A of this Initial Study (Urban Crossroads, 2023a), the Project site is in the South Coast Air Basin (SCAB). The SCAB encompasses approximately 6,745 square miles and includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAB is bound by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, respectively; and the San Diego County line to the south. The larger South Coast Air Quality Management District (SCAQMD) boundary includes 10,743 square miles.

The Air Quality Impact Analysis included in Appendix A of this Initial Study and the PVCCSP EIR provide additional details related to the SCAB, the regulatory background, the regional climate, wind patterns, criteria pollutants and their health effects, existing air quality, and regional air quality improvement. Existing air quality is measured at established SCAQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. Criteria pollutants, discussed in detail in the Air Quality Impact Analysis included in Appendix A of this Initial Study, are pollutants that are regulated through the development of human health-based and/or environmentally-based criteria for setting permissible levels, or standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. The National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect for each pollutant regulated under these standards, including ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), inhalable particulate matter with a diameter of 10 microns or less (PM₁₀), fine particulate matter with a diameter of 2.5 microns or less (PM_{2.5}), and lead (Pb), are shown in Table 2-1 of the Air Quality Impact Analysis included in Appendix A. The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the California (State) and federal standards.

The SCAQMD monitors levels of various criteria pollutants at 37 permanent monitoring stations and 5 single-pollutant source (lead) air monitoring sites throughout the air district. On December 28, 2021, CARB posted the proposed 2021 amendments to the state and national area designations. Table 3-1 identifies the current attainment designations for the SCAB.

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

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

Source: (Urban Crossroads, 2023a, Table 2-3)

As discussed previously in Section 2.1, Project Site Location and Setting, of this Initial Study, until July 2022, the Project site was occupied by GRFCO, which operated various industrial uses onsite between 1984 and 2022. The Project site is currently being leased for truck trailer storage; this use occupied the northern and eastern portion of the Project site since 2018 and began leasing

the southwestern portion of the Project site in July 2022 when GRFCO vacated the property. As discussed under Threshold 3a below, the operational activities from these uses involved vehicular trips, which currently and historically have generated air pollutant emissions.

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly. individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as "sensitive receptors;" they are also known to be locations where an individual can remain for 24 hours (e.g., residences, hotels, and hospitals). Additionally, localized air quality impacts were evaluated at the nearest non-residential structures to the Project site to account for workers that may be present at these sites. The SCAQMD recommends that the nearest sensitive receptor be considered when determining a Project's potential to cause an individual and cumulatively significant impact. Representative sensitive receptors near the Project site include two single-family residences (a non-conforming use in the Light Industrial zone) and existing light industrial use as described below and shown on Exhibit 27. Even though the existing non-conforming residences likely will ultimately be developed with land uses that are consistent with the underlying Light Industrial land use designation, for purposes of a conservative analysis they are considered sensitive receptors until such time they no longer exist. As further described below, the industrial use is considered a sensitive receptor with respect to localized impacts of NO_x and CO.

- R1: Location R1 represents the property line of the existing residence at 1307 West Nance Street, approximately 44 feet north of the Project site.
- **R2:** Location R2 represents the property line of the existing residence at 1210 West Nance Street, approximately 44 feet north of the Project site.
- R3: Location R3 represents the property line of the existing residence at 953 West Nance Street, approximately 1,599 feet east of the Project site.
- **R4:** Location R4 represents the property line of the existing worker receptor at 4451 Wade Avenue, approximately 19 feet south of the Project site.
- **R5:** Location R5 represents the property line of the existing residence at 4439 Wade Avenue, approximately 234 feet south of the Project site.
- **R6:** Location R6 represents the existing commercial warehouse Xpo Logistics at 4413 Patterson Ave, approximately 214 feet east of the Project site.

EXPLANATION OF CHECKLIST ANSWERS

This section summarizes the Air Quality Impact Analysis and HRA prepared by Urban Crossroads (Urban Crossroads, 2023a; Urban Crossroads, 2023b), which are provided in Appendix A and Appendix B, respectively, of this Initial Study.

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



Source(s): Urban Crossrads (08-09-2022)







air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

In December 2022, the SCAQMD released the Final 2022 AQMP. The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, State, and local levels.

Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation/Sustainable Communities Strategy (RTP/SCS) and updated emission inventory methodologies for various source categories. The Project's consistency with the AQMP has been determined using the 2022 AQMP.

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the 1993 CEQA Handbook, and the Project's consistency area addressed below.

• Consistency Criterion No. 1. The proposed Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP

The violations that Consistency Criterion No. 1 refers to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded. As evaluated below under Thresholds 3b and 3c, the Project's construction-source emissions and operational emission would not exceed applicable regional significance thresholds or local significance thresholds (LST), as applicable. Therefore, the Project is determined to be consistent with Consistency Criterion No. 1.

• Consistency Criterion No. 2. The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. As such, when considering that no emissions thresholds will be exceeded, a less than significant impact would result.

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

The City of Perris General Plan land use and Zoning designation for the Project site is PVCCSP and the PVCCSP designation is "Light Industrial." The Project consists of up to 237,438 square feet of high-cube fulfillment warehouse use (90 percent of total square footage) and up to 26,382 square feet of manufacturing use for an industrial building totaling approximately 263,820 sf, which is consistent with the site's General Plan land use and Zoning designations. Therefore, this land use development and associated air quality emissions would have been accounted for in the SCAQMD's 2022 AQMP. Population and employment estimates for the City are compiled by the SCAG in the RTP/SCS. The Project would increase employment opportunities within the City; however, the employment projections in the RTP/SCS are based on information gathered from cities within SCAG's iurisdiction. Hence, because the Project is consistent with the land use designation in the PVCCSP and the Perris General Plan, employment estimates associated with implementation of the Project would have also been accounted for in the RTP/SCS. Therefore, because the Project is compliant with local land use plans and population projections, the Project would not conflict with or obstruct implementation of the AQMP, and the Project would be consistent with Consistency Criterion No. 2.

In summary, the Project would be consistent with the AQMP. Impacts would be less than significant.

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

Land uses such as the Project affect air quality through construction-source and operational-source emissions. In May 2022, the SCAQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) and other California air districts, released the latest version of the California Emissions Estimator Model (CalEEMod) v2022.1. The purpose of this model is to calculate construction-source and operational-source criteria pollutants (NO_X, VOC, PM₁₀, PM_{2.5}, SO_X, and CO) and greenhouse gas (GHG) emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for the Project to determine construction and operational air quality emissions. Output from the model runs for both construction and operational activity are provided in the Air Quality Impact Analysis included in Appendix A of this Initial Study. (Urban Crossroads, 2023a)

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

TABLE 3-2 MAXIMUM MASS DAILY EMISSIONS THRESHOLD

Pollutant	Construction	Operations
	Regional Thresholds ¹	
NO _X	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
SO _X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day

Based on SCAQMD CEQA Air Quality Significance Thresholds, April 2019

Lbs/day = pounds per day

Source: (Urban Crossroads, 2023a, Table 3-1)

Regional Construction Impacts

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

For analysis purposes in this Initial Study air quality analysis, it is estimated that construction would occur in one phase and last for approximately 10 months. The construction schedule utilized in the analysis is shown in Table 3-3 in Appendix A and anticipates construction starting in April 2023 and ending in February 2024. This represents a "worst-case" analysis scenario should construction occur any time after these respective dates since emission factors for construction would decrease as time passes and the analysis year increases due to emission regulations becoming more stringent⁵. A summary of estimated construction equipment is provided in Table 2-1 of this Initial Study. All equipment used during Project construction would meet or exceed CARB Tier 4 Interim emission standards (refer to project design feature PDF 3-1). The site-specific construction fleet may vary due to specific Project needs at the time of construction. The duration of construction activity and associated equipment both represent a reasonable approximation of the expected construction fleet. Specific modeling assumptions and detailed modeling inputs/outputs are provided in the Air Quality Impact Analysis included in Appendix A. (Urban Crossroads, 2023a; Urban Crossroads, 2023b)

The Project is required to comply with the applicable PVCCSP EIR mitigation measures listed previously; and implementation of mitigation measures MM Air 3 (compliance with SCAQMD Rule 403); MM Air 6 (use of Tier 4 off-road construction equipment, in exceedance of minimum required Tier 3 equipment, and which is further demonstrated with project design feature PDF 3-1); and MM Air 9 (use of Super-Compliance VOC paints) are included in the modeling. As shown, Project construction-source emissions would not exceed the numerical thresholds of significance established by the SCAQMD for any criteria pollutant. Accordingly, the Project would not emit substantial concentrations of these pollutants during construction and would not contribute to an existing or projected air quality violation, on a direct or

⁵ As shown in the CalEEMod User's Guide Version 2022.1, Section 4.3 "Off-Road Equipment" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

cumulatively-considerable basis. Thus, a less than significant impact would occur for Project-related construction-source emissions and no additional Project-level mitigation is required.

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

Year	Emissions (lbs/day)						
i eai	VOC	NOx	СО	SO _X	PM ₁₀	PM _{2.5}	
Summer (Smog Season)							
2023	1.07	20.20	38.00	0.06	6.01	2.85	
	Wint	er					
2023	9.70	13.90	27.00	0.04	2.22	0.66	
2024	10.30	18.90	28.10	0.04	2.30	0.75	
Maximum Daily Emissions	10.30	20.20	38.00	0.06	6.01	2.85	
SCAQMD Regional Threshold	75	100	550	150	150	55	
Threshold Exceeded?	NO	NO	NO	NO	NO	NO	

Source: (Urban Crossroads, 2023a, Table 3-5)

Long-Term Operational Impacts

As previously discussed, the Project site includes existing uses. The estimated operation-source emissions from the existing development are summarized on Table 3-4. The primary source of existing emissions is from mobile sources. The mobile source emissions are estimated based on trip generation data generated for the uses that occupied the Project site when traffic counts were conducted at the Project site driveways on December 1 and 2, 2021 (refer to the discussion of uses provided in Section 2.1). The onsite uses generated 140 daily trips (Urban Crossroads, 2023c).

TABLE 3-4 MASS DAILY EMISSIONS FROM EXISTING DEVELOPMENT

Sauras		Emissions (lbs/day)						
Source	VOC	NOx	СО	SOx	PM ₁₀	PM _{2.5}		
	Summer	(Smog Sea	son)					
Mobile Source	1.00	4.73	4.68	0.05	0.99	0.26		
Area Source	0.03	< 0.005	0.04	< 0.005	< 0.005	< 0.005		
Energy Source	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005		
Total Maximum Daily Emissions	1.03	4.73	4.72	0.05	0.99	0.26		
		Winter						
Mobile Source	0.98	4.95	4.09	0.05	0.99	0.26		
Area Source	0.02	0.00	0.00	0.00	0.00	0.00		
Energy Source	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005		
Total Maximum Daily Emissions	1.00	4.95	4.09	0.05	0.99	0.26		

Source: (Urban Crossroads, 2023a, Table 3-8)

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

Operational-source emissions are summarized in Table 3-5. It should be noted that the Project is required to comply with the applicable PVCCSP EIR mitigation measures as identified previously; however, to provide a conservative analysis, no credit was

taken for any of the PVCCSP EIR operational mitigation measures. As shown, the Project would not exceed the applicable regional thresholds of significance established by the SCAQMD for emissions of any criteria pollutant. Accordingly, the Project would not emit substantial concentrations of these pollutants during long-term operation and would not contribute to an existing or projected air quality violation, on a direct or cumulatively-considerable basis. Impacts associated with long-term emissions from the Project would be less than significant and additional mitigation is not required.

TABLE 3-5 MAXIMUM MASS DAILY OPERATIONAL EMISSIONS

Cauras	Emissions (lbs/day)						
Source	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}	
	Summer	(Smog Sea	son)				
Mobile Source	2.40	12.60	27.30	0.15	3.52	0.86	
Area Source	8.25	0.10	11.50	< 0.005	0.02	0.02	
Energy Source	0.08	1.52	1.28	0.01	0.12	0.12	
On-Site Equipment Source	0.12	0.38	16.44	0.00	0.03	0.03	
Diesel Fire Water Pump Generator	0.16	0.45	0.41	< 0.005	0.02	0.02	
Project Maximum Daily Emissions	11.01	15.05	56.93	0.16	3.71	1.05	
Existing Emissions	1.03	4.73	4.72	0.05	0.99	0.26	
Total Maximum Daily Emissions	9.98	10.32	52.21	0.11	2.72	0.79	
SCAQMD Regional Threshold	55	55	550	150	150	55	
Threshold Exceeded?	NO	NO	NO	NO	NO	NO	
		Winter	·			1	
Mobile Source	2.28	13.30	23.00	0.15	3.52	0.86	
Area Source	6.37	0.00	0.00	0.00	0.00	0.00	
Energy Source	0.08	1.52	1.28	0.01	0.12	0.12	
On-Site Equipment Source	0.12	0.38	16.44	0.00	0.03	0.03	
Diesel Fire Water Pump Generator	0.16	0.45	0.41	< 0.005	0.02	0.02	
Project Maximum Daily Emissions	9.01	15.65	41.13	0.16	3.69	1.01	
Existing Emissions	1.00	4.95	4.09	0.05	0.99	0.26	
Total Maximum Daily Emissions	8.01	10.70	37.04	0.11	2.70	0.77	
SCAQMD Regional Threshold	55	55	550	150	150	55	
Threshold Exceeded?	NO	NO	NO	NO	NO	NO	

Source: (Urban Crossroads, 2023a, Table 3-9)

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

In addition, the SCAQMD adopted Rule 2305, the Warehouse Indirect Source Rule. This rule requires warehouse buildings greater than 100,000 square feet to directly reduce NO_X and PM emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities. The SCAQMD estimates that

Rule 2305 will reduce warehouse-related emissions by 10 to 15 percent basin-wide. It should be noted that emissions reductions associated with Rule 2305 cannot be quantified in the CalEEMod and are therefore not reflected in the emissions presented herein. The Project would be subject to this rule.

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

Health Consequences

In December 2018, in the case of Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, the California Supreme Court held that an Environmental Impact Report's (EIR) air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. As discussed in brief filed in the Friant Ranch case (included in the Air Quality Impact Analysis included in Appendix A of this Initial Study), correlating a project's criteria air pollutant emissions to specific health impacts is challenging. The SCAQMD, which has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes noted that it may be difficult to quantify health impacts for criteria pollutants.

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

Health effects related to ozone are therefore the product of emissions generated by numerous sources throughout a region. The SCAQMD's Brief goes on to state that "it takes a large amount of additional precursor emissions (NO $_X$ and VOCs) to cause a modeled increase in ambient ozone levels over an entire region," The SCAQMD states that based on their own modeling in the SCAQMD's 2012 AQMP, a reduction of "NO $_X$ "

by 432 tons per day (157,680 tons/year) and reducing VOC by 187 tons per day (68,255 tons/year) would reduce ozone levels at the SCAQMD's monitor site with the highest levels by only 9 parts per billion." As such, the SCAQMD concludes that it is not currently possible "to accurately quantify ozone-related health impacts caused by NO_X or VOC emissions from relatively small projects."

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

Notwithstanding, the Project's localized impact to air quality for emissions of CO, NO_X , PM_{10} , and $PM_{2.5}$ have been evaluated by comparing the Project's onsite emissions to the SCAQMD's applicable LST thresholds. The LST analysis provided under Threshold "3c" below concludes that the Project would not result in emissions exceeding SCAQMD's LSTs. Therefore, the Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_X , PM_{10} , and $PM_{2.5}$.

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

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

Localized Impacts from Criteria Pollutants

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

Since the total acreage disturbed is 1 acre for demolition, 3.5 acres per day for site preparation and 4 acres per day grading activities, the SCAQMD's screening look-up tables are utilized in determining impacts. It should be noted that since the look-up tables identify thresholds at only 1 acre, 2 acres, and 5 acres, linear regression has been utilized to determine localized significance thresholds. Consistent with SCAQMD

guidance, the thresholds presented in Table 3-6 were calculated by interpolating the threshold values for the Project's disturbed acreage.

The nearest receptor used for evaluation of localized impacts of PM_{10} and $PM_{2.5}$ is represented by location R1, which represents the existing residence at 1307 West Nance Street, approximately 44 feet/13 meters north of the Project site. As such, for evaluation of localized PM_{10} and $PM_{2.5}$, a 25-meter distance was used⁶. The nearest receptor used for evaluation of localized impacts of NO_X and CO is represented by location R4 which represents the existing worker receptor at 4451 Wade Avenue, approximately 19 feet/6-meters south of the Project site⁷.

TABLE 3-6 MAXIMUM DAILY LOCALIZED CONSTRUCTION EMISSIONS THRESHOLDS

Construction Activity	Construction Localized Thresholds ¹					
Construction Activity	NOx	СО	PM ₁₀	PM ₁₀		
Demolition	167 lbs/day	1,145 lbs/day	4 lbs/day	3 lbs/day		
Site Preparation	219 lbs/day	1,207 lbs/day	10 lbs/day	6 lbs/day		
Grading	290 lbs/day	2,221 lbs/day	11 lbs/day	7 lbs/day		

^{1.} LSTs presented in this table are based on the SCAQMD Final LST Methodology, July 2008 Source: (Urban Crossroads, 2023a, Table 3-11)

Localized Construction Impacts

For the Project, the appropriate SRA for the LST analysis is the Perris Valley monitoring station (SRA 24). LSTs apply to CO, NO₂, PM₁₀, and PM_{2.5}. The SCAQMD produced look-up tables for projects less than or equal to 5 acres in size. As described in Section 3.6 of the Air Quality Impact Analysis included in Appendix A of this Initial Study, although the total acreage disturbed is more than 5.0 acres per day for construction activities, the 5-acre LST Methodology look-up tables can be used as a screening tool to determine which pollutants require additional detailed analysis. This approach is conservative as it assumes that all onsite emissions associated with the Project would occur within a concentrated 5-acre area. This screening method would therefore over-predict potential localized impacts, because by assuming that onsite construction activities are occurring over a smaller area, the resulting concentrations of air pollutants are more highly concentrated once they reach the smaller site boundary than they would be for activities if they were spread out over a larger surface area.

Table 3-7 identifies the localized impacts at the nearest receptor location in the vicinity of the Project. Outputs from the model runs for construction LSTs are provided in Appendix A. As shown, Project construction-source emissions would not exceed the numerical LSTs established by the SCAQMD for any criteria pollutant, and this impact would be less than significant. The Project is required to comply with the applicable construction-related PVCCSP EIR mitigation measures identified previously, which

⁶ The LST Methodology indicates that it is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.

⁷ Consistent with LST Methodology, the nearest commercial, educational, or industrial use to the Project site is used to determine construction and operational LST air impacts for emissions of NOX and CO as the averaging periods for these pollutants are shorter (8 hours or less) and it is reasonable to assumed that an individual could be present at these sites for periods of one to 8 hours.

would further reduce local construction emissions. No additional Project-level mitigation is required.

TABLE 3-7 LOCALIZED CONSTRUCTION EMISSIONS (WITH NO MITIGATION EXCEPT FOR PVCCSP EIR MITIGATION)

Construction	Year		Emissions	(lbs/day)	
Activity	rear	NO _X	СО	PM ₁₀	PM _{2.5}
	2023	11.90	18.20	0.46	0.23
Domolition	Maximum Daily Emissions	11.90	18.20	0.46	0.23
Demolition	SCAQMD Localized Threshold	167	1,145	4	3
	Threshold Exceeded?	NO	NO	NO	NO
	2023	15.70	30.00	5.76	2.79
Site	Maximum Daily Emissions	15.70	30.00	5.76	2.79
Preparation	SCAQMD Localized Threshold	219	1,207	10	6
	Threshold Exceeded?	NO	NO	NO	NO
	2023	19.90	36.20	2.85	1.16
Cradina	Maximum Daily Emissions	19.90	36.20	2.85	1.16
Grading	SCAQMD Localized Threshold	290	2,221	11	7
	Threshold Exceeded?	NO	NO	NO	NO

Source: (Urban Crossroads, 2023a, Table 3-12)

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

Localized Operational Impacts

As noted previously, the LST methodology provides look-up tables for sites with an area with daily disturbance of 5 acres or less. For projects that exceed 5 acres, such as the Project site, the 5-acre LST look-up tables can be used as a screening tool to determine which pollutants require additional detailed analysis. This approach is conservative as it assumes that all onsite emissions associated with the Project would occur within a concentrated 5-acre area. This screening method would therefore overpredict potential localized impacts, because by assuming that onsite operational activities are occurring over a smaller area, the resulting concentrations of air pollutants are more highly concentrated once they reach the smaller site boundary than they would be for activities if they were spread out over a larger surface area. On a larger site, the same amount of air pollutants generated would disperse over a larger surface area and would result in a lower concentration once emissions reach the project-site boundary. As such, LSTs for a 5-acre site during operations are used as a screening tool to determine if further detailed analysis is required.

Table 3-8 shows the calculated emissions for the Project's operational activities compared with the applicable LSTs. The LST analysis generally includes onsite sources described previously; however, the CalEEMod outputs do not separate onsite

and offsite emissions from mobile sources. To establish a maximum potential impact scenario for analytic purposes, the emissions shown in Table 3-8 represent all onsite Project-related stationary (area) and mobile sources. The longest onsite distance is roughly 0.25 miles for both trucks and passenger cars. Modeling based on these assumptions demonstrates that the operational-source emissions would not exceed the SCAQMD's LST's for any criteria pollutant and a less than significant impact would occur. The Project is required to comply with the applicable PVCCSP EIR operational mitigation measures identified previously, which would serve to reduce emissions. No additional Project-level mitigation is required.

TABLE 3-8 LOCALIZED OPERATIONAL EMISSIONS (WITH NO MITIGATION)

On-Site Emissions		Emissions (Ibs/day)				
On-Site Emissions	NO _X	СО	PM ₁₀	PM _{2.5}		
Maximum Daily Emissions	3.64	17.70	0.21	0.17		
SCAQMD Localized Threshold	325	2,556	4	2		
Threshold Exceeded?	NO	NO	NO	NO		

Source: (Urban Crossroads, 2023a, Table 3-14)

Carbon Monoxide Hotspots

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

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO "hot spot" analysis was conducted for the 2003 AQMP for four busy intersections in Los Angeles at the peak morning and afternoon time periods (2003 Los Angles hot spot study). This hot spot analysis did not predict any violation of CO standards. According to the 2003 hot spot analysis, the 8-hour CO concentration at the Long Beach Boulevard and Imperial Highway intersection (the highest CO-generating intersection within the hotspot analysis), was measured at 9.3 ppm; however, only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection, the remaining 8.6 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared.

The ambient 1-hr and 8-hr CO concentration within the Project study area is estimated to be 1.9 ppm and 1.4 ppm, respectively (data from Perris Valley station for 2020). Therefore, even if the traffic volumes for the Project were double or even triple of the traffic volumes generated at the Long Beach Boulevard and Imperial Highway intersection, coupled with the on-going improvements in ambient air quality, the Project would not be capable of resulting in a CO "hot spot" at any study area intersections.

Similar considerations are also employed by other air districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle

emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact. The busiest intersection evaluated in the 2003 Los Angeles hot spot study was Wilshire Boulevard and Veteran Avenue, with a daily traffic volume of approximately 100,000 vehicles per day and AM/PM traffic volumes of 8,062 vehicles per hour and 7,719 vehicles per hour respectively. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm. This indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (estimated at 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm). At buildout of the Project, the Project is anticipated to generate a net increase of 422 trip-ends per day, which is lower than the highest daily traffic volumes generated at the busiest intersection in the CO "hot spot" analysis. As such, Project-related traffic volumes are less than the traffic volumes identified in the 2003 AQMP.

The Project, with approximately 492 total net trip-ends per day, would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study, or based on representative BAAQMD CO threshold considerations. Therefore, CO "hot spots" are not an environmental impact of concern for the Project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant and no mitigation is required.

Toxic Air Contaminants

A mobile source HRA (Urban Crossroads, 2023b) was completed for the Project to evaluate the potential mobile source health risk impacts to sensitive receptors (residents) and workers associated with the development of the Project. More specifically, the HRA addresses health risk impacts as a result of exposure to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks accessing the site. The HRA is included in its entirety in Appendix B of this Initial Study and is summarized below.

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

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

Vehicle DPM emissions were estimated using emission factors for PM₁₀ generated with the 2021 version of the EMission FACtor model (EMFAC) developed by the CARB. EMFAC2021 incorporates regional motor vehicle data, information and estimates regarding the distribution of vehicle miles traveled (VMT) by speed, and number of starts per day. Additional information about the assumptions and methods for conducting the HRA are provided in the Project-specific HRA included in Appendix B of this Initial Study.

The modeled emission sources for the Project are shown on Exhibit 28, which illustrates onsite truck idling, and Exhibit 29, which illustrates offsite truck travel. Truck traffic volumes and truck routes were estimated based on the *Patterson Commerce Center (DPR 22-00003) Traffic Analysis Scoping Agreement* (March 24, 2023) (Urban Crossroads, 2023c), which can be found in Appendix M1 of this Initial Study. The emissions derived in the HRA assume that every truck accessing the Project site will idle for 15 minutes, this is an overestimation of actual idling times and thus conservative.⁸ The Project is expected to generate a total of approximately 632 vehicular trip-ends per day (actual vehicles) (316 vehicles inbound plus 316 vehicles outbound), which includes 530 total passenger vehicle trips per day (265 passenger vehicles inbound plus 265 passenger vehicles outbound) and 102 total truck trips per day (51 trucks inbound plus 51 trucks outbound) Additional details of HRA methods are included in the HRA in Appendix B of this Initial Study.

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

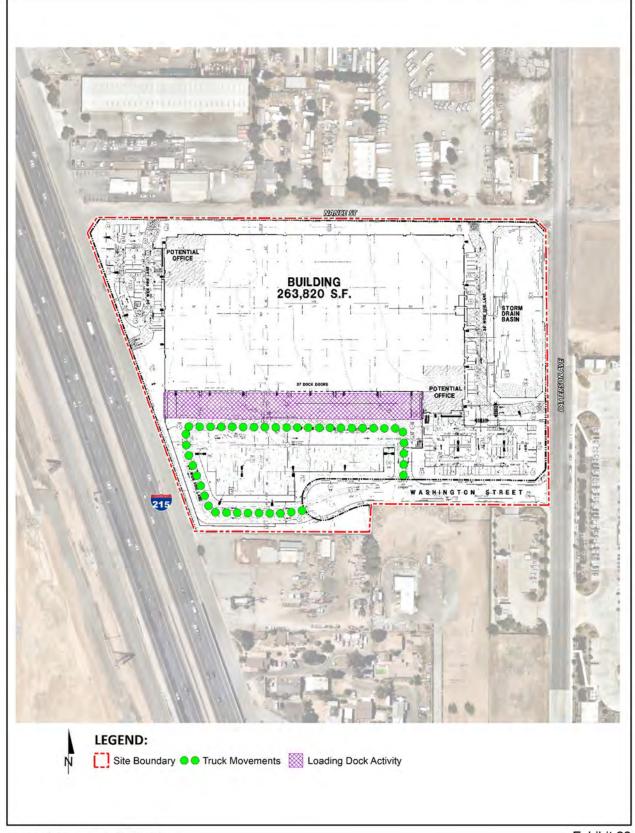
Construction Impacts

The land use with the greatest potential exposure to Project construction-source DPM emissions is Location R1, which is located approximately 44 feet north of the Project site at an existing residence located at 1307 West Nance Street. R1 is placed in the private outdoor living areas (backyard) facing the Project site. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 0.88 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. All other receptors during construction activity would experience less risk than what is identified for this location.

Operational Impacts

Individual Exposure Scenario. The residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R5, which is located approximately 234 feet south of the Project site at an existing non-conforming residential structure located at 4439 Wade Avenue. R5 is placed in the private outdoor living areas (backyard) facing the Project site. At the MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 0.40 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which

⁸ Although the Project is required to comply with CARB's idling limit of 5 minutes, staff at SCAQMD recommends that the onsite idling emissions should be estimated for 15 minutes of truck idling, which would consider onsite idling which occurs while the trucks are waiting to pull up to the truck bays, idling at the bays, idling at check-in and check-out, etc.



Source(s): Urban Crossroads (10-13-2022)

Exhibit 28









Source(s): Urban Crossroads (10-13-2022)

Exhibit 29







would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance from the Project site than the MEIR analyzed herein, and TACs generally dissipates with distance from the source, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project would not cause a significant human health or cancer risk to nearby residences.

Worker Exposure Scenario⁹. The worker receptor land use with the greatest potential exposure to Project operational-source DPM emissions is Location R4, which represents the adjacent potential worker receptor south of the Project site. At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact is 0.14 in one million, which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the MEIW analyzed herein, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project would not cause a significant human health or cancer risk to adjacent workers.

School Child Exposure Scenario. There are no schools located within a 0.25-mile of the Project site; the nearest school in the Project vicinity is Val Verde Academy, which is located approximately 5,430 feet southeast of the Project site. As further discussed in Section 2.6 of the HRA included in Appendix B of this Initial Study, a 0.25 radius or 1,320 feet geographic scope is commonly utilized for determining potential impacts to nearby schools. This radius is more robust than, and therefore provides a more health protective scenario for evaluation than the 1,000-foot impact radius identified in the HRA. Since there is no school site located within 0.25-mile of the Project site, there would be no significant impact that would occur to the nearest school, or any other schools located more than 0.25 mile from the Project site.

Construction and Operational Impacts

The land use with the greatest potential increased cancer risk due to exposure to Project construction-source and operational-source DPM emissions is Location R1. At this location, the maximum incremental cancer risk attributable to Project construction and operational DPM source emissions is estimated at 1.09 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction and operational activity. All other receptors during construction and operational activity would experience less risk than what is identified for this location.

3d. Less Than Significant Impact. Odors would be emitted during construction and operation of uses allowed under the PVCCSP, including industrial uses as proposed

⁹ SCAQMD guidance does not require assessment of the potential health risk to on-site workers. Excerpts from the document OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines—The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA 2003), also indicate that it is not necessary to examine the health effects to on-site workers unless required by RCRA (Resource Conservation and Recovery Act) / CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) or the worker resides on-site.

with the Project. The PVCCSP EIR (Section 4.2, Air Quality) concludes that, because of the short-term duration and quantity of emissions during construction and the limited outdoor exposure of persons to odors, odor impacts from construction of projects in the PVCCSP planning area would be less than significant.

Land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the solid waste regulations. The Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the Project construction and operations would be less than significant and no mitigation is required.

4. BIOLOGICAL RESOURCES

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				\boxtimes
c)	Have a substantial adverse effect on states or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				\boxtimes
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?				

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	uld the Project:				
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				\boxtimes
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?			\boxtimes	

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

No PVCCSP Standard and Guidelines are applicable to the analysis of biological resources for the Project. The preparation of a Project-specific habitat assessment required by PVCCSP EIR mitigation measures MM Bio 2 and MM Bio 6 has been completed as part of preparation of this Initial Study. The results of the habitat assessment are presented in this section.

EXPLANATION OF CHECKLIST ANSWERS

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

In addition to the PVCCSP EIR, the information presented in this section is based on the report titled *Biological Resources Technical Report*, *Patterson Logistics Center Project Site* (Biological Resources Report), prepared by Cadre Environmental (Cadre), dated March 2023 (Cadre, 2023). This report is included in Appendix C of this Initial Study and is summarized below. The study area for this report, and as referenced in this section, includes the Project site and off-site improvement areas, which collectively encompass approximately 19.5 acres.

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

Based on the Regional Conservation Authority (RCA) MSHCP Information Map query and review of the MSHCP, the Project site and associated off-site improvement areas are not located within any designated MSHCP "Criteria Area" cells, Cell Group corridors, or linkages (RCA, 2022; Cadre, 2023). The entire Project site is not within a designated survey area for narrow endemic plant species. The Project site occurs partially within a predetermined MSHCP Survey Area for the burrowing owl (*Athene cunicularia*).

4a. Less Than Significant Impact with Mitigation Incorporated.

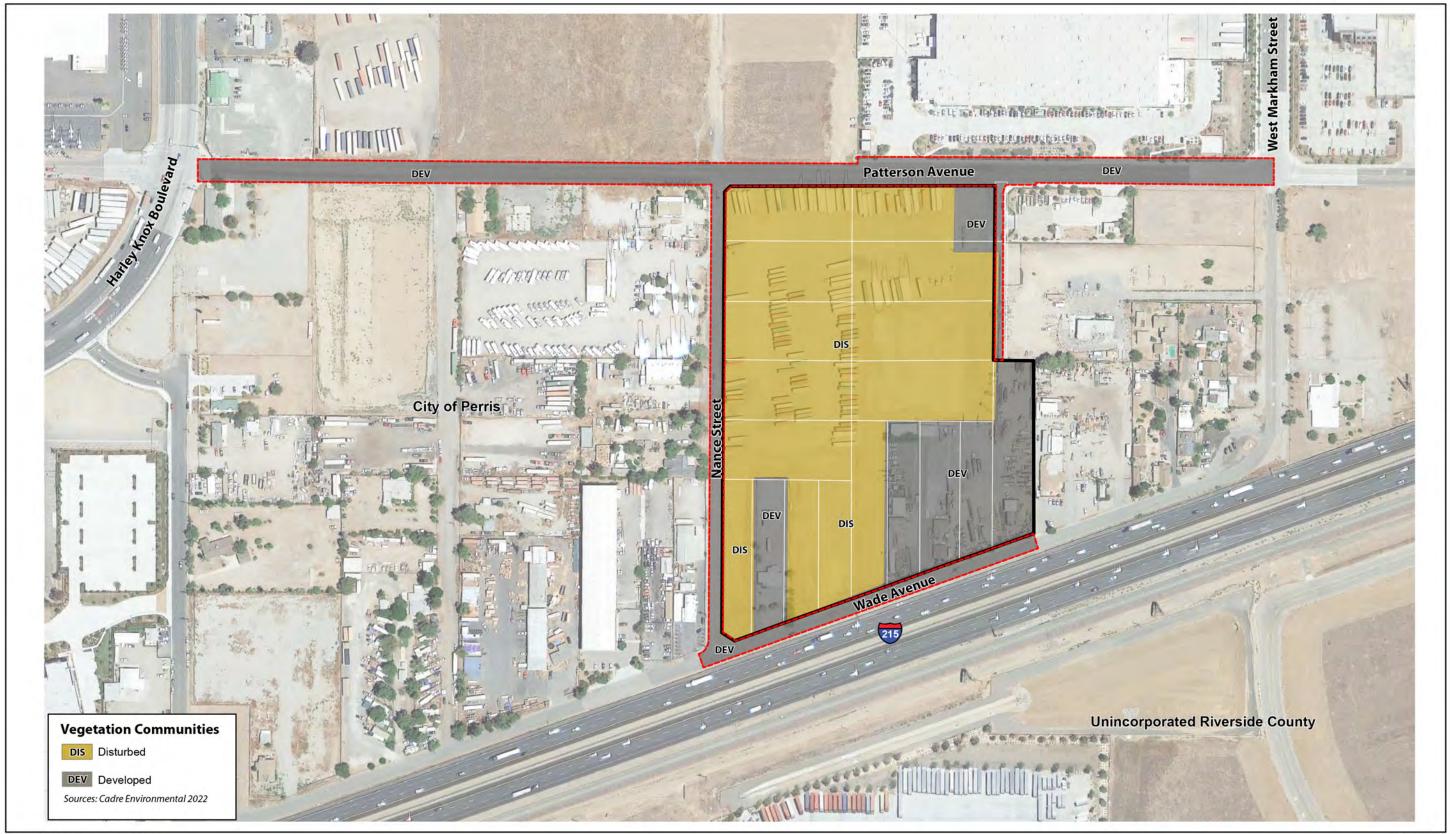
Vegetation Communities

The Project site and offsite improvement areas are completely devoid of natural undisturbed vegetation communities and is characterized as disturbed/developed. A few ornamental trees are scattered on-site adjacent to the existing structures. No sensitive or undisturbed native habitats, or riparian/riverine resources are located within or adjacent to the Project site. The Project site currently contains approximately 11.2 acres of disturbed vegetation community type and approximately 2.8 acres of developed vegetation community type on-site, and the Project's off-site improvement area consists of 5.51 acres of developed vegetation community type. As shown on Exhibit 30, these on- and off-site areas would be directly impacted with implementation of the Project.

Developed areas include the paved reaches of Nance Street, Wade Avenue, Patterson Avenue, and existing onsite structures. Ruderal non-native species within the disturbed vegetation community were documented along the bordering fence line, which included prickly sow-thistle (Sonchus asper), ripgut grass (Bromus diandrus), stinknet (Oncosiphon piluliferum), common fiddleneck (Amsinckia menziesii), cheeseweed (Malva parviflora), burclover (Medicago polymorpha), black mustard (Brassica nigra), tocalote (Centaurea melitensis), red-stemmed filaree (Erodium cicutarium), and Russian thistle (Salsola tragus). A few scattered ornamental trees and palms including but not limited to Peruvian pepper tree (Schinus mole) and Mexican fan palm (Washingtonia robusta) are located on-site adjacent to the developed structures. No native or undisturbed vegetation would be impacted as a result of the Project and no impact would occur.

Special Status Plant Species

The entire Project site and off-site improvement areas do not occur within an MSHCP-designated survey area for Narrow Endemic or Criteria Area sensitive plant species. Therefore, no surveys are required. No State or federally listed threatened or endangered plant species were detected or are expected to occur on-site. No other California Native Plant Society (CNPS), special-status plants, or species of local concern were observed onsite as outlined in Table 2, Sensitive Plant Species with Potential to Occur Onsite, of the Biological Resources Report. Therefore, no impacts to sensitive plant species would result from implementation of the Project and no mitigation is required.



Source(s): CADRE Environmental (01-30-2023)







Special Status Wildlife Species

The Project site and offsite improvement areas occurs partially within a predetermined MSHCP Survey Area for the burrowing owl, as discussed below. No state or federally listed threatened or endangered wildlife species were detected or are expected to occur. No other special-status wildlife species, or species of local concern were observed or expected to occur within the Project impact area as outlined in Table 3, Sensitive Wildlife Species with Potential to Occur Onsite. Additionally, critical habitat designations by the USFWS were researched to determine if any of the Project site or offsite improvement areas are located within USFWS critical habitat. The Project site does not occur within a designated critical habitat for federally endangered or threatened species.

Burrowing Owl

No suitable burrowing owl burrows greater than 4 inches in diameter potentially utilized for refugia and/or nesting were documented within the Project impact area. Additionally, no burrowing owl or characteristic signs such as white-wash, feathers, tracks, or pellets were detected within the Project impact area boundaries due the site assessment. Although focused surveys are not warranted, PVCCSP EIR mitigation measure MM Bio 2 (as updated in Project-level mitigation measure MM 4-2 per recommendations from the California Department of Wildlife (CDFW)) requires that a pre-construction survey be conducted within 30 days prior to the initiation of construction. With implementation of Project-level mitigation measure MM 5-2, impacts to burrowing owl would be less than significant, and no additional mitigation is required.

Birds/Migratory Birds/Raptors

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

"Much of the PVCC area (exceptions include portions of the "developed" areas) provides foraging habitat for many raptor species, including special-status raptors. The loss of raptor habitat is covered and mitigated for through participation with the MSHCP. Direct impacts to raptors (and other migratory birds), including their active nests, are prohibited through the MBTA and California Fish and Game Code. As such, vegetation removals should be conducted outside of the nesting season, but if not feasible then nesting bird surveys, as required by mitigation measure MM Bio 1, shall be conducted prior to any removals."

General wildlife species documented during the field survey include Anna's hummingbird (*Calypte anna*), mourning dove (*Zenaida macroura*), black phoebe (*Sayornis nigricans*), Say's phoebe (*Sayornis saya*), American crow (*Corvus brachyrhynchos*), northern mockingbird (*Mimus polyglottos*), and house finch (*Haemorhous mexicanus*). A few scattered ornamental trees and palms, including but not limited to Peruvian pepper tree and Mexican fan palm, are onsite and are expected to have the potential to provide nesting habitat for migratory birds protected under the California Department of Fish and Game (CDFG) Codes and Migratory Bird Treaty Act (MBTA). As such, Project-level mitigation measure MM 4-1 (replacing PVCCSP EIR mitigation measure Bio 1 per CDFW recommendation) is incorporated into the Project as required by the City, which requires that a pre-activity filed survey be conducted by

a qualified biologist if site preparation activities occur during the nesting/breeding season (generally February 1 to August 31 although the nesting season may be extended due to weather and drought conditions), to determine if active nests of species protected by the MBTA or CDFG codes are present in the construction zone. With implementation of Project-level mitigation measure MM 4-1, which identifies actions to take if nesting birds are present, impacts to nesting birds would be less than significant and no additional mitigation is required.

Mammals

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

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

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

Amphibians

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

4b-4c. No Impact. The Biological Resources Report included in Appendix C of this Initial Study, includes a determination of the presence of jurisdictional waters, riparian or riverine areas, and vernal pools in the survey area. No wetlands or jurisdictional resources regulated by the US Army Corps of Engineers (USACE), the CDFW), or the RWQCB were documented within or immediately adjacent to the Project impact area. Additionally, no sensitive or undisturbed native communities were documented within or adjacent to the Project impact area. Therefore, implementation of the Project would not impact riparian habitat, wetlands, or sensitive natural communities.

No evidence of vernal pools, seasonal depressions, seasonally inundated road ruts or other wetland features were recorded within the Project impact area. A review of historic aerials was conducted to determine if inundated features were present during years of high rainfall when features would certainly be documented. No sign or indication of inundation was documented within the Project site during a review of historic aerials. None of the conditions (i.e., no inundated depressions including road ruts, hydric soils, historic inundation, etc.) were observed or documented within the

Project impact area areas. No potential habitat for Riverside fairy shrimp (*Streptocephalus woottoni*) or vernal pool fairy shrimp (*Branchinecta lynchi*) was documented within the Project site or offsite improvement area. Therefore, no impact would result.

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

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

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

No heritage or protected tree species that meet the definition of the City of Perris Urban Forestry Establishment and Care Ordinance occur onsite. The removal of primarily Peruvian pepper trees would not conflict with City's tree policies and the planting and maintenance of trees as part of the Project would comply with the City's Urban Forestry Ordinance, and no impacts would result.

Additionally, the Project Applicant would be required the MSHCP Local Development Mitigation fee in accordance with City Ordinance No. 1123. The Project would comply with Ordinance No. 1123, and no impacts would result.

The Project would not conflict with the City's local policies or ordinances protecting biological resources. No impacts would occur.

- 4f. Less Than Significant Impact. As previously identified, the Project site and off-site improvement areas are within the Western Riverside County MSHCP. The Project site and off-site improvement areas are in the City of Perris within the Mead Valley Area Plan of the MSHCP. The City is a permittee under the MSHCP and, while the Project is not specifically identified as a Covered Activity under Section 7.1 of the MSHCP, public and private development that are outside of Criteria Areas and Public/Quasi-Public Lands are permitted under the MSHCP, subject to consistency with MSHCP policies that apply to area outside of Criteria Areas. As such, to achieve coverage, the Project must be consistent with the following policies of the MSHCP:
 - The policies for the protection of species associated with Riparian/Riverine areas and vernal pools as set forth in Section 6.1.2 of the MSHCP;
 - The policies for the protection of Narrow Endemic Plant Species as set forth in Section 6.1.3 of the MSHCP;
 - The requirements for conducting additional surveys as set forth in Section 6.3.2 of the MSHCP; and
 - Guidelines pertaining to the Urban/Wildlands Interface intended to address indirect effects associated with locating Development in proximity to the MSHCP Conservation Area as detailed in Section 6.1.4 of the MSHCP.

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

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

Riparian/Riverine Areas and Vernal Pools

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

As discussed under Thresholds 4b and 4c above, no MSHCP Section 6.1.2 riparian, riverine or vernal pool resources were documented within or adjacent to the Project Site and preparation of an MSHCP Determination of Biological Equivalent or Superior Preservation (DBESP) is not required. No sign or indication of inundation, vernal pools, seasonal depressions, seasonally inundated road ruts, or other wetland features were

recorded within the Project impact area during a review of historic aerials. Therefore, no potential habitat for Riverside fairy shrimp or vernal pool fairy shrimp was documented within the Project impact area. No riparian scrub, forest or woodlands resources were documented within or adjacent to the Project impact area. Therefore, no suitable habitat for sensitive species that occupy these habitats is present. The Project would not conflict with MSHCP Section 6.1.2.

Narrow Endemic Plant Species

Section 6.1.3 of the MSHCP, Protection of Narrow Endemic Plant Species, states that the MSHCP database does not provide sufficient detail to determine the extent of the presence/distribution of Narrow Endemic Plant Species within the MSHCP Plan Area. As previously identified, the Project impact area does not occur within an MSHCP predetermined Survey Area for narrow endemic plant species. Therefore, no surveys are required. The Project would not conflict with Section 6.1.3 of the MSHCP.

Additional Survey Needs and Procedures

In accordance with Section 6.3.2 of the MSHCP, Additional Survey Needs and Procedures, additional surveys may be needed for certain species in order to achieve coverage for these species. The query of the RCAMSHCP Information Map and review of the MSHCP determined that the Project impact area occurs partially within a predetermined Survey Area for burrowing owl. As discussed under Threshold 4a, no burrows or structures representing suitable refugia or breeding resources were documented within the Project impact area. The burrowing owl is currently not present and focused surveys are not warranted. However, the species could colonize the property in the future. Therefore, burrowing owl preconstruction surveys would be required to ensure protection for this species and consistency with the conservation goals as outlined in Project-level mitigation measure MM 4-2. No other special-status wildlife species surveys were identified as being required. The Project would not conflict with Section 6.3.2 of the MSHCP.

Existing Habitat Conservation Plans and Critical Habitat

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

Conclusion

The Project would not conflict with the provisions of the Western Riverside County MSHCP and SKR HCP. Impacts would be less than significant.

PROJECT-LEVEL MITIGATION MEASURES

Mitigation measure MM 4-1 below implements PVCCSP EIR mitigation measure MM Bio 1, which has subsequently been revised by the City of Perris per CDFW recommendation.

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.

Mitigation measure MM 4-2 below implements PVCCSP EIR mitigation measure MM Bio 2, which has subsequently been revised by the City of Perris per CDFW recommendation.

The Project proponent shall retain a qualified biologist to conduct a preconstruction 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.

5. CULTURAL RESOURCES

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?				
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		\boxtimes		
c)	Disturb any human remains, including those interred outside of formal cemeteries?		\boxtimes		

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

No Standards and Guidelines related to cultural resources are included in the PVCCSP. PVCCSP EIR mitigation measure MM Cultural 1 below outlines the requirements for preparation of a Phase

I Cultural Resources Study and has been completed through preparation of the *Cultural Resources Study for the Patterson Commerce Center Project* (Cultural Resources Report) prepared by Brian F. Smith and Associates, Inc. (BFSA) (March 2023) (BFSA, 2023a). The Cultural Resources Report is included in Appendix D of this Initial Study and is summarized herein.

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 archeologist¹⁰ shall be submitted to the City of Perris Planning Division for review and approval. The Phase I Cultural Resources Study shall determine whether the subject implementing development would potentially cause a substantial adverse change to any significant paleontological, archaeological, or historic resources. The Phase I Cultural Resources Study shall be prepared to meet the standards established by Riverside County and shall, at a minimum, include the results of the following:

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

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

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

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

Avoidance is the preferred treatment for known significant prehistoric and historical archaeological sites, and sites containing Native American human remains. Where feasible, plans for implementing projects shall be developed to avoid known significant archaeological resources and sites containing

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.

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

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

EXPLANATION OF CHECKLIST ANSWERS

Prior to conducting a field survey, BFSA conducted a California Historic Resources Information System (CHRIS) records search at the EIC at the University of California, Riverside (UCR). The EIC is a designated branch of the California Historical Resources Information System and houses records regarding archaeological and historic resources in Inyo, Mono, and Riverside Counties. Although no resources were recorded within the Project site or off-site improvement area boundaries, the search results did identify 39 cultural resource properties located within one mile (see Table 1 of the Cultural Resources Survey included in Appendix D of this Initial study). The resources identified during the records search include historic water and irrigation features, historic railroad features, prehistoric bedrock milling features, a multicomponent historic water tank and prehistoric habitation site, historic buildings, historic refuse scatters, a historic road segment, and historic power poles.

The records search results also indicated there have been a total of 63 cultural resource studies conducted within a one-mile radius of the Project site and off-site improvement area, two of which include the Project site (2007 Study and 2014 Study). The 2007 Study was a large overview of resources within the North Perris Industrial Specific Plan, which would later become the current PVCCSP. The 2007 Study included a focused survey, records search, literature review, and public outreach. Although the current Project site was not surveyed during that study, based on research, recent development, and cultural resource density, the Project site was assigned a cultural resource sensitivity rating of moderate to high to contain cultural resources based on the property's status of not being extensively disturbed. The 2014 study was a monitoring plan submitted for the Mid-County Parkway and did not include any specific information on the Project site or off-site improvement area.

BFSA also requested a Sacred Lands File (SLF) review by the Native American Heritage Commission (NAHC), which was positive for the presence of sacred sites or location of religious or ceremonial importance within the search radius. In accordance with the recommendations of the NAHC, BFSA contacted all tribes listed in the NAHC response letter for additional information. As of the date of the Cultural Resources Report, BFSA received one response from the Quechan Tribe of the Fort Yuma Reservation, who deferred to tribes more local to the Project site.

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

A survey of the Project site was completed by BFSA on February 23, 2022, in order to determine if cultural resources exist within the Project site or the offsite improvement area.

5a. Less than Significant with Mitigation Incorporated. A description of the ethnohistoric period (1769 to present), general history of the Project area, and history of development within the Project site is provided in the Cultural Resources Report included in Appendix D of this Initial Study. In summary, the Project site is located just west of the Rancho San Jacinto Nuevo y Portrero land grant, which was granted to Miguel Pedrorena by Mexican Governor Pío Pico in 1846. The Project site is located within an area traditionally known as Val Verde and subdivided in 1893 as the Val Verde Tract. The tract is situated just north of what would later become the City of Perris. As such, the Val Verde Tract was historically influenced by the nearby town. The Val Verde region along with much of the Perris Valley has traditionally been dominated by agricultural properties focusing upon grain, grapes, potatoes, melons, alfalfa, and green vegetables. However, the Val Verde Tract along with the nearby Riverside Tract suffered early on due to an inability to obtain a steady supply of water. The general area also was influenced by the development of March Field during the twentieth century. March Field was originally established on March 1, 1918 as the Alessandro Flying Training Field following the United States' entry into World War I. The establishment of March Field was important to the region due to the role the local inhabitants would play during World War I and World War II. Farming continued to be important to the region, which was aided by access to new water sources. Although the Perris region generally remained agricultural throughout the twentieth century, in recent years, the city has seen a growth in residential and industrial development. Today, many of the former large agricultural fields have been developed into residential tracts and large logistics centers and warehouses servicing the greater Southern California region.

When first subdivided, the Project site was situated within Block 3 of the Val Verde Tract. The block was sectioned into nine lots, most of which were 10 acres. The current Project site and off-site improvement areas included all of Lot 1 and portions of Lots 2, 8, and 9. Ownership of the Project site has transferred numerous times. The available records indicate that between 1892 and 1932, no structures were located within the subject property or off-site improvement areas. According to aerial photographs, no buildings are present within the Project site until 1953, when a structure is present in the far western half along Wade Avenue. By 1962, development, likely a residence, is visible in the southwest corner of the property. Two additional residences are visible on the property by 1966. The construction of these residences was completed in 1964; the third residence was demolished between 1975 and 1994.

According to the records search, no previously recorded historic resources were identified on the Project site or offsite improvements area. During the field survey, the two single-family residential structures constructed in 1964 were identified and meet the age threshold of 50 years to require historic structure evaluations to determine eligibility for the CRHR. A detailed description of these buildings and occupants is provided in the Cultural Resources Report. No other cultural resources were observed during the survey.

CEQA Guidelines Section 15064.5 defines "historical resources" as resources listed in the CRHR or a local register, determined significant by the lead agency, or determined to be eligible by the California Historical Resources Commission for listing in the CRHR. The criteria for eligibility are generally set by the National Historic Preservation Act of 1966, which established the NRHP, and which recognizes properties that are significant

at the federal, State, and local levels. To be eligible for listing in the NRHP and CRHR, a district, site, building, structure, or object must possess integrity of location, design, setting, materials, workmanship, feeling, and association relative to America, as further described in Section 3.3.4, Significance Evaluation, of the Cultural Resources Report included in Appendix D of this Initial Study.

Additionally, for a historic resource to be eligible for listing on the CRHR, the resource must be found significant at the local, State, or national level, under one or more of the following criteria:

- CRHR Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- CRHR Criterion 2: It is associated with the lives of persons important in our past.
- CRHR Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.
- CRHR Criterion 4: It has yielded, or may be likely to yield, information important in prehistory or history.

The Cultural Resources Report analyzed the onsite buildings' integrity against the criteria listed in the *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. Based on these criteria, the 4517 Wade Avenue buildings meet four categories of the integrity criteria, including location, design, materials, and workmanship. However, the 4517 Wade Avenue buildings do not retain integrity of setting, feeling, or association due to the transformation of the surrounding area and lack of association with any significant persons or events. Although the 4517 Wade Avenue buildings retain integrity with respect to location, design, materials, and workmanship, they are not representative or significant examples of Transitional Ranch style. Additionally, the Cultural Resources report analyzed the 4517 Wade Avenue buildings against the CRHR historical resource criteria and concluded that the buildings do not meet the CRHR criteria for a historical resource. As such, the 4517 Wade Avenue buildings are not eligible for listing on the CRHR. Any future alteration or planned demolition of the buildings would not require mitigation.

Based on the literature review and the field survey conducted, no known historic resources currently exist at the Project site or offsite improvement areas. However, archaeological monitoring is recommended because grading may expose historic features or deposits associated with the historic use of the property since the 1930s. Implementation of mitigation measure MM 5-1 presented below, which identifies steps to be taken to identify and protect any resources encountered, would reduce this potential impact to a less than significant level. Mitigation Measure MM 5-1 implements PVCCSP EIR mitigation measures MM Cultural 2, MM Cultural 3, and MM Cultural 4, as subsequently revised by the City of Perris.

5b. Less than Significant with Mitigation Incorporated. The Project site is in a region of Riverside County that has a long and diverse history of human occupation and interaction. Prior to the arrival of the Spanish in the late 1700s, the area was occupied by Native American cultures, as further discussed in the Tribal Cultural Resources section of this Initial Study.

Based on the records search conducted as part of preparation of the Cultural resources study. 21 prehistoric resources were recorded within one mile of the Project site, none of which are located onsite or within the offsite improvement area. Although no historic or prehistoric resources are recorded within the Project impact area, there is a potential for archaeological deposits to exist on site that are related to use of the Project site since the 1930s. Further, because a number of prehistoric milling sites are located west of I-215, which suggests the Project site was likely part of the prehistoric subsistence activities in the area, there is a potential to encounter buried cultural deposits during construction. The potential to encounter buried cultural resources during construction is considered a potentially significant impact. Based upon this potential, monitoring of grading is recommended to prevent the inadvertent destruction of any potentially important cultural deposits that were not observed or detected during the current cultural resources study. The City of Perris has developed a standard mitigation measure in coordination with input from Native American tribal representatives to manage unanticipated discoveries of archaeological and Native American resources. Implementation of mitigation measure MM 5-1 presented below. which identifies steps to be taken to identify and protect any resources encountered. would reduce this potential impact to a less than significant level. Mitigation Measure MM 5-1 implements PVCCSP EIR mitigation measures MM Cultural 2, MM Cultural 3, and MM Cultural 4, as subsequently revised by the City of Perris.

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

PROJECT-LEVEL MITIGATION MEASURES

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

Prior to the issuance of grading permits, the project proponent/developer shall retain a professional archaeologist meeting the Secretary of the Interior's Professional Standards for Archaeology (U.S. Department of Interior 2012; Registered Professional Archaeologist preferred). The primary task of the consulting archaeologist shall be to monitor the initial ground-disturbing activities at both the subject property 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 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 archaeological monitor shall continually assess the potential for resources throughout the course of ground disturbing activities and shall have the power to modify or reduce the level of monitoring should the potential to encounter resources be significantly reduced.

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

If any artifacts of Native American origin are discovered, all activities in the immediate vicinity of the find (within a 50-foot radius) shall stop and the project proponent and project archaeologist shall notify the City of Perris Planning Division, the Soboba Band of Luiseño Indians, the Pechanga Band of Luiseño Indians, the Agua Caliente Band of Cahuilla Indians, the Morongo Band of Mission Indians, and the Rincon Band of Luiseño Indians. A designated Native American representative from either the Soboba Band of Luiseño Indians, the Pechanga Band of Luiseño Indians, the Agua Caliente Band of Cahuilla Indians, the Morongo Band of Mission Indians, or the Rincon Band of Luiseño Indians shall be retained to assist the project archaeologist in the significance determination of the Native American resource as deemed possible. The designated Luiseño or Mission tribal representative will be given adequate time to examine the find. The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA and shall consider the religious beliefs, customs, and practices of the Luiseño or Mission tribe. If the find is determined to be of sacred or religious value, the Luiseño tribal representative will work with the City and consulting archaeologist to protect the resource in accordance with tribal requirements. All analysis will be 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 offsite project improvement areas, mitigation measure MM 5-2 shall immediately apply and all items found in association with Native American human remains shall be considered grave goods or sacred in origin and subject to special handling.

Native American artifacts that are relocated/reburied at the project site would be subject to a fully executed relocation/reburial agreement with the assisting Luiseño tribe. This shall include, but not be limited to, an agreement that artifacts will be reburied on-site and in an area of permanent protection to be agreed upon

between sponsor and the designated Native American representative, if requested, and that reburial shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist.

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

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

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

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

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

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

Code Section 7050.5(b).

If the coroner determines that the remains are of Native American origin, the coroner would notify the NAHC, which will identify the "Most Likely Descendent" (MLD). Despite the affiliation with any Luiseño tribal representative(s) at the site, the NAHC's identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of Native American human remains and may recommend to the project proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave goods. The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains will be determined in consultation between the project proponent and the MLD. In the event that there is disagreement regarding the

disposition of the remains, State law will apply and median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98I and 5097.94(k)).

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

6. <u>ENERGY</u>

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

Explanation of Checklist Answers

Energy was added in December 2018 as a topic in the Environmental Checklist included in Appendix G of the State CEQA Guidelines. Energy consumption was not specifically addressed in the PVCCSP EIR. This section summarizes the *Patterson Commerce Center Energy Analysis* (Energy Analysis) prepared by Urban Crossroads (March 27, 2023) (Urban Crossroads, 2023d), which is provided in Appendix E of this Initial Study and summarized herein. The purpose of this report is to ensure that energy use is considered by the City of Perris, as the lead agency, and to quantify anticipated energy usage associated with construction and operation of the Project, determine if the usage amounts are efficient, typical, or wasteful for the land use type, and to emphasize avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. The methods and assumptions used for preparation of the Energy Analysis are outlined in Appendix E of this Initial Study. The Project site is completely disturbed and is occupied by two residential structures recently occupied by an industrial use. The existing uses do not generate a substantive amount of energy use, and no credit for existing energy use has been taken for purposes of this analysis.

6a. Less Than Significant Impact.

Energy Use During Construction

Construction of the Project would consume electricity and fuel from construction equipment use. Construction workers and construction vendor/hauling trips would also consume fuel. The estimated power cost of onsite electricity usage during the construction of the Project is assumed to be approximately \$15,246.13. Additionally, based on the assumed power cost, it is estimated that the total electricity usage during construction is calculated to be approximately 117,858 kilowatt-hours (kWh).

Construction equipment used by the Project would result in single event consumption of approximately 34,374 gallons of diesel fuel. The equipment used for Project construction would conform to CARB regulations and California emissions standards. There are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient, wasteful, or unnecessary consumption of fuel.

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

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

Construction worker trips for full construction of the Project would result in the estimated fuel consumption of 15,534 gallons of fuel. Additionally, fuel consumption from construction vendor trips (medium-heavy duty trucks [MHDT] and heavy-heavy duty trucks [HHDT]) would total approximately 9,877 gallons. Diesel fuel would be supplied by City and regional commercial vendors. Indirectly, construction energy efficiencies and energy conservation would be achieved through the use of bulk purchases, transport and use of construction materials. The 2022 Integrated Energy Policy Report (IEPR) released by the California Energy Commission (CEC) has shown that fuel efficiencies are getting better within on- and off-road vehicle engines due to more stringent government requirements. As supported by the preceding discussions, Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

In general, the construction processes promote conservation and efficient use of energy by reducing raw materials demands, with related reduction in energy demands associated with raw materials extraction, transportation, processing and refinement.

Use of materials in bulk reduces energy demands associated with preparation and transport of construction materials as well as the transport and disposal of construction waste and solid waste in general, with corollary reduced demands on area landfill capacities and energy consumed by waste transport and landfill operations.

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

Energy Use During Project Operation

Transportation Energy Demands

Annual vehicular trips and related VMT generated by the operation of the Project would result in an estimated 35,075 gallons of fuel consumption per year for light-duty autos (LDAs), 3,635 gallons of fuel for light-duty trucks 1 (LDT1)¹¹, 17,884 gallons of fuel for LDT2s¹², 18,130 gallons for fuel for medium-duty trucks (MDVs); 6,342 gallons of fuel for (LHDT1), 1,865 gallons of fuel for LHDT2, 15,475 MHDT, 141,365 HHDT, and 1,266 gallons of fuel for motorcyclists (MCY). The total estimated annual fuel consumption from Project generated VMT would result in a fuel demand 241,038 gallons of fuel.

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

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

Facility Energy Demands

Building operations and site maintenance activities associated with the Project would result in the consumption of electricity and potentially natural gas. Annual electricity demands from Project operations are estimated at 1,392,159 kWh/year of electricity

¹¹ Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.

¹² Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

and potential natural gas demands are estimated at 5,666,325 kilo British Thermal Units (kBTU)/year of natural gas.

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

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

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

Consistency with Federal Energy Regulations

Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

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

Consistent. Transportation and access to the Project site is provided by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because SCAG is not planning for intermodal facilities on or through the Project site.

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

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

Consistent. The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access, acts to reduce VMT, takes advantage of existing

infrastructure systems, and promotes land use compatibilities through collocation of similar uses. The Project supports the strong planning processes emphasized under TEA-21. The Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21.

Consistency with State Energy Regulations

Integrated Energy Policy Report

Senate Bill 1389 (SB 1389) (Bowen, Chapter 568, Statutes of 2002) requires the CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety. The CEC prepares these assessments and associated policy recommendations every two years, with updates in alternate years, as part of the Integrated Energy Policy Report. The 2022 IEPR was adopted February, 2023, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2022 IEPR introduces a new framework for embedding equity and environmental justice at the CEC and the California Energy Planning Library which allows for easier access to energy data and analytics for a wide range of users. Additionally, energy reliability, western electricity integration, gasoline cost factors and price spikes, the role of hydrogen in California's clean energy future, fossil gas transition and distributed energy resources are topics discussed within the 2022 IEPR.

Consistent. Electricity would be provided to the Project by SCE. SCE's Clean Power and Electrification Pathway (CPEP) white paper builds on existing state programs and policies. As such, the Project is consistent with, and would not otherwise interfere with, nor obstruct implementation the goals presented in the 2022 IEPR. Additionally, the Project would comply with the applicable Title 24 standards which would ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary. As such, development of the proposed Project would support the goals presented in the 2022 IEPR.

State of California Energy Plan

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

Consistent. The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the Project facilitates access and takes advantage of existing infrastructure systems. The Project therefore supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan.

California Code Title 24, Part 6, Energy Efficiency Standards

California Code of Regulations Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Energy Code), was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity. The 2022 version of Title 24 Energy Code was adopted by the CEC and will become effective on January 1, 2023.

Consistent. The Project would be required to comply with the applicable Title 24 standards in place at the building permit applications are submitted. Therefore, the Project would not result in a significant impact on energy resources. The Project would be subject to Title 24 standards.

California Code Title 24, Part 11, CALGreen

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: California Green Building Standards Code (CALGreen) is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on August 1, 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective on January 1, 2023. The CEC anticipates that the 2022 energy code will provide \$1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons

Consistent. The Project would be required to comply with applicable CALGreen Code requirements.

AB 1493 Pavley Regulations and Fuel Efficiency Standards

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

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

California's Renewable Portfolio Standard (RPS)

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

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

SB 350— Clean Energy and Pollution Reduction Act of 2015

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

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 25 percent by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the CEC, and local publicly-owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electricity transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

In September 2018, the legislature approved, and the Governor signed SB 100, which builds on the targets established in SB 1078 and SB 350. Notably, SB 100 sets a goal of powering all retail electricity sold in California with renewable and zero-carbon resources. Additionally, SB 100 updates the interim renewables target from 50 to 60 percent by 2030.

Consistent. The Project would use energy from SCE, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. No feature of the Project would interfere with implementation of SB 350 or SB 100. Additionally, the Project would be designed and constructed to implement the energy efficiency measures for new industrial developments and would include several measures designed to reduce energy consumption.

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

7. GEOLOGY AND SOILS

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	uld the Project:				
	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?			\boxtimes	
	iii) Seismic-related ground failure, including liquefaction?			\boxtimes	
	iv) Landslides?				\boxtimes
b)	Result in substantial soil erosion or the loss of topsoil?			\boxtimes	
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?				
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		\boxtimes		

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

No PVCCSP Standard and Guidelines are applicable to the analysis of geology and soils. The PVCCSP EIR includes mitigation measure MM Geo 1 for potential impacts related to geology and soils. As required by PVCCSP EIR mitigation measure MM Geo 1 presented below, a Geotechnical Investigation - Proposed Industrial Building SWC Patterson Avenue and Nance Street (Geotechnical Investigation) has been prepared for the Project by Southern California Geotechnical (SCG) (April 18, 2022) (SCG, 2022). The Geotechnical Investigation is included in Appendix F of this Initial Study and is summarized herein.

MM Geo 1 Concurrent with the City of Perris' review of implementing development projects, the project proponent of the implementing development project shall submit a geotechnical report prepared by a registered geotechnical engineer and a qualified engineering geologist to the City of Perris Engineering Administration Division for its review and approval. The geotechnical report shall assess the soil stability within the implementing development project affecting individual lots and building

pads and shall describe the methodology (e.g., overexcavated, backfilled, compaction) being used to implement the project's design.

EXPLANATION OF CHECKLIST ANSWERS

Information presented in this section is derived primarily from the site-specific Geotechnical Investigation prepared for the Project and provided in its entirety in Appendix F of this Initial Study. The Geotechnical Investigation included a visual site reconnaissance, seven subsurface exploratory borings to depths of approximately 5 to 30 feet below the ground surface (bgs), field and laboratory testing of soil samples, geotechnical engineering analysis to provide criteria for preparing Project design, and preparation of the geotechnical investigation.

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

- **Policy S-7.1** Require all development to provide adequate protection from damage associated with seismic incidents.
- 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.
- Action S-7.2a Require implementation of mitigation measures identified in the studies outlined in Policy S-7.2, prior to the issuance of grading and building permits.
- Action S-7.2c Require cut and fill transition lots to be over-excavated and require complete maximum variation of fill depths beneath structures to mitigate the potential of seismically induced differential settlement.
- Action S.7-2d Adopt and enforce the most current version of the *California Building Code* (CBC).

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

No Impact. The PVCCSP EIR Initial Study determined that the PVCCSP planning area is not located in an Alquist-Priolo Earthquake Fault Zone, and no other known faults are in the vicinity (Perris, 2012). Also, the City of Perris General Plan states that no Alquist-Priolo zones are in the City (Perris, 2022c). The Project site is outside any Alquist-Priolo Special Studies Zone (SCG, 2022). There would be no impact related to surface rupture at the site and no mitigation is required.

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

The PVCCSP EIR and the CBC, as adopted by the City, provide guidelines and parameters that reduce the effects of ground shaking produced by regional seismic events; and the Project Applicant shall implement seismic design considerations in accordance with the CBC, which is reflected in the Safety Element Action S.7-2d.

Consistent with PVCCSP EIR mitigation measure MM Geo 1 above, a site-specific Geotechnical Investigation has been prepared by a registered geotechnical engineer. The nearest earthquake fault is the San Jacinto Valley fault zone, located approximately 8.6 miles northeast of the site. The Geotechnical Investigation includes site-specific seismic design parameters, and provides design/construction recommendations for soil constraints, site grading, construction, foundation design and construction, floor slab design and construction, retaining wall design and construction, and pavement design parameters. Consistent with Safety Element policies cited above, the Project would be designed and constructed in accordance with the Geotechnical Investigation recommendations (referred to as mitigation measures in Safety Element Action S-7.2a above), which are based on CBC and City of Perris requirements. The Geotechnical Investigation concludes that with adherence to the identified recommendations, the Project is considered feasible from a geotechnical engineering standpoint. Therefore, with compliance with City General Plan policies and the recommendations of the final Geotechnical Investigation. impacts related to strong seismic ground shaking would be less than significant, and no further mitigation is required.

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

Liquefaction is the loss of strength in generally cohesionless, saturated soils when the pore-water pressure induced in the soil by a seismic event becomes equal to or exceeds the overburden pressure. The depth within which the occurrence of liquefaction may impact surface improvements is identified as the upper 50 bgs. According to the Geotechnical Investigation, the Project site is within a zone of low liquefaction susceptibility. Additionally, the subsurface conditions encountered at the soil boring locations are not identified to be conducive to liquefaction. Therefore, liquefaction is not considered to be a design concern for this Project (SCG, 2022). This impact would be less than significant.

- **7a(iv). No Impact**. The PVCCSP EIR Initial Study (Section 3) concludes that there would be no impacts related to landslides, as the PVCCSP planning area is relatively flat and not located near any areas that possess potential landslide characteristics. Onsite elevations range from approximately 1,510 to 1,499 feet amsl, and the elevations of adjacent parcels are similar. There would be no impacts related to landslides.
- **7b.** Less Than Significant Impact. The PVCCSP EIR Initial Study determined that no long-term soil erosion would occur, as projects implementing the PVCCSP would involve the development of structures, paving (i.e., hardscape), and landscaping;

short-term construction-related erosion potential would be addressed through compliance with NPDES permit requirements, and impacts would be less than significant.

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

The PVCCSP EIR (Section 4.7, Hydrology and Water Quality) cites the following related regulations applicable to the analysis of surface water quality during construction and operation of a project: Clean Water Act, State Water Resources Control Board and associated NPDES permitting requirements, and Chapter 14.22, Stormwater/Urban Runoff Management and Discharge Control, of the Perris Municipal Code (Perris, 2022d). To control erosion during construction of the Project, construction activities shall be conducted in compliance with the current statewide NPDES General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities adopted by the State Water Resources Control Board (SWRCB), as further discussed in the Hydrology and Water Quality section of this Initial Study. Specifically, consistent with Measure VI.A.3 of the General Plan Conservation Element, proof of the appropriate NPDES Permit (RWQCB San Jacinto Watershed Construction Activities Permit) and a Storm Water Pollution Prevention Plan (SWPPP) must be provided to the City prior to issuance of a grading permit for the Project site. Therefore, with compliance with General Plan Measure VI.A.3, impacts related to erosion during construction would be less than significant.

Regarding erosion during long-term Project operation, consistent with the PVCCSP EIR Initial Study, the Project site would be landscaped or covered with impervious surfaces and surface runoff would be captured and treated by an onsite storm drain and water quality treatment system. Implementation of the Project would result in less long-term erosion and loss of topsoil than under the Project site's existing conditions. The City's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare and submit to the City for approval a WQMP. The WQMP identifies an effective combination of erosion control and sediment control measures (i.e., BMPs) to reduce or eliminate sediment discharge to surface water from stormwater and non-stormwater discharges. The Preliminary WQMP for the Project, prepared by Huitt-Zollars, Inc. (Huitt-Zollars) (included in Appendix J of this Initial Study), incorporates area inlets and storm drain lines, that would direct storm water runoff to an onsite bioretention basin. The basin would be effective at removing silt and sediment from stormwater runoff, and the Preliminary WQMP requires postconstruction maintenance and operational measures to ensure ongoing erosion protection. Compliance with the final WQMP would be required as a condition of Project approval and long-term maintenance of onsite water quality features is required. Therefore, the Project would not result in substantial erosion or loss of top soil during long-term operation. The Project's impact would be less than significant, and no mitigation is required.

7c. Less Than Significant Impact. The PVCCSP EIR Initial Study (Section 3) determined that the potential for lateral spreading and landslide is low, as the PVCCSP planning area is relatively flat; however, the potential for subsidence is high. Seismic-related

ground failure is addressed under Threshold 7a(iii) above. Expansive soil is addressed under Threshold 7d below.

The Geotechnical Investigation (SCG, 2022) determined that the Project site is underlain by aggregate base measuring between approximately 5 to 6 inches in thickness, artificial fill at the ground surface and extending to a depth between approximately 2 and 2 ½ feet below existing site grades, and native alluvium. Younger alluvium was found extending to depths between approximately 4 ½ and 8 feet below the existing site grades and older alluvium was found extending to at least the maximum depth explored (30 feet below existing site grades). The younger alluvium generally consists of loose to medium dense silty sands and clayey sands, with varying amounts of clay and silt content. Most of the older alluvial soils encountered at the boring locations consist of medium dense to very dense silty sands and clayey sands.

It should be noted that the artificial fill does not have documentation regarding the placement and compaction of these soils; therefore, the artificial fill is identified as undocumented fill. Additionally, these fill soils are underlain by native alluvium that possess settlement characteristics to a depth of 5 feet. Per the recommendation in the Geotechnical Investigation, remedial grading is warranted within the proposed building area to remove the existing undocumented fill and upper portion of the near surface native alluvial soils and replacement of these materials with compacted structural fill soils. The recommended remedial grading would improve the Project site's settlement characteristics to be within tolerable limits. Therefore, with the implementation of the recommended remedial grading, the Project's proposed building foundation would not subject the soils to significant stress increases.

When the grading recommendations are completed, the post-construction collapse, shrinkage, and subsidence are expected to be within acceptable limits. The removal and recompaction of the artificial fill and near surface native soils is calculated to result in an average shrinkage between 5 and 12 percent. Shrinkage estimates for the individual samples range between 0 and 16 percent. Minor ground subsidence is estimated at 0.1 feet due to settlement and machinery working.

The results of the soluble sulfate testing indicate that the selected samples of the near-surface soils possess a sulfate concentration of approximately 0.002 percent, which is a negligible concentration of soluble sulfates. However, the Geotechnical Investigation recommends that additional soluble sulfate testing be conducted at the completion of rough grading to verify the soluble sulfate concentrations of the soils which are present at pad grade within the building area. Additionally, the potential corrosive effects of onsite on buried metallic structures were tested; the on-site soils are not corrosive to ferrous pipes, reinforced concrete pipes, or copper pipes.

As discussed above under Threshold 7a(iii), the Project site is not within an area that is susceptible to liquefaction or liquefaction hazards such as lateral spreading. Therefore, the Project would not develop the proposed warehouse and manufacturing building on a geologic unit that is susceptible to liquefaction or lateral spreading. No impacts would occur.

Consistent with General Plan measures cited above and PVCCSP EIR mitigation measure MM Geo 1, the Project would be designed and constructed in accordance with all Geotechnical Investigation recommendations (referred to as mitigation measures in Safety Element Action S-7.2a above); and the Geotechnical Investigation shall be reviewed and approved by the City Engineer. Therefore, with compliance with

City General Plan measures and the recommendations of the final Geotechnical Investigation, impacts related to location on an unstable geologic unit or soil would be less than significant; and no additional mitigation is required.

- 7d. Less Than Significant Impact. Expansive soils are fine-grained silts and clays that are subject to swelling and contracting. The PVCCSP Initial Study determines that the five U.S. Department of Agriculture soil types identified in the PVCCSP planning area have low expansion potential. Soil samples and laboratory testing conducted as part of the Geotechnical Investigation indicate that the near surface soils consist of silty sands and clayey sands that possess a very low expansion potential (SCG, 2022). Based on the very low expansive classification, no design considerations related to expansive soils are considered warranted for this site and this impact would be less than significant.
- **7e. No Impact.** The Project would be connected to the City's sewer system for conveyance of wastewater to treatment facilities, and there would be no impact related to onsite soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.
- 7f. Less Than Significant with Mitigation Incorporated. A Paleontological Resource Assessment for the Patterson Commerce Center Project was prepared by BFSA (March 28, 2023) (Paleontological Resources Assessment) (BFSA, 2023b), is included in Appendix G of this Initial Study, and is summarized herein.

The closest known fossil localities to the Project site are reported in a paleontological literature review and collections and records search conducted by the Western Science Center in the City of Hemet for another development project in the City, approximately 0.7 mile southeast of the Project site. The record search indicated that there are no known fossil localities within that project site or within a 1.0-mile radius; however, Pleistocene-aged sedimentary deposits within Riverside County, such as those that underlie the Project site, have a high paleontological sensitivity. The fossil bones of Pleistocene-aged mammals have been recovered from similar deposits in the region.

Based on the Paleontological Sensitivity Map (Exhibit CN-7) in the Conservation Element of the City's Comprehensive General Plan 2030, the Project site is within Area 1 for paleontological sensitivity and assigned a "high" paleontological sensitivity based on the presence of the Pleistocene older valley deposits (high sensitivity) mapped at the surface. Measure IV.A.4 of the City of Perris General Plan Conservation Element requires paleontological monitoring for project sites located in Paleontological Sensitive Area 1 once any excavation begins. Similarly, the WSC concluded that excavation activity associated with development of the area has the potential to impact the paleontologically sensitive Pleistocene alluvial units and recommends a paleontological resource mitigation plan be put in place to monitor, salvage, and curate any recovered fossils associated with the current study area.

There is potential to encounter previously unknown unique paleontological resources during construction activities. This could result in a significant impact to paleontological resources. Based on (1) the existence of potentially fossiliferous Pleistocene alluvial fan deposits underlying the Project site; (2) the known occurrence of terrestrial vertebrate fossils at shallow depths from Pleistocene older alluvial fan sediments across the Inland Empire of western Riverside County; and (3) the high paleontological sensitivity typically assigned to Pleistocene alluvial fan sediments for yielding

paleontological resources, paleontological monitoring would be required during mass grading, trenching, and excavation activities in undisturbed Pleistocene older alluvial fan sediments in order to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources, if present. Because the Project site is located within Area 1 shown on the Conservation Element Paleontological Sensitivity Map, paleontological monitoring of the Project site will be required once any excavation begins.

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

PROJECT-LEVEL MITIGATION MEASURES

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

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

Monitoring shall be restricted to undisturbed subsurface areas of older Quaternary alluvium, which might be present below the surface. The 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 Planning Division, will signify completion of the program to mitigate impacts to paleontological resources.

8. GREENHOUSE GAS EMISSIONS

Wo	uld the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			\boxtimes	

The following analysis is based on the *Patterson Commerce Center Greenhouse Gas Analysis*, *City of Perris* (GHG Analysis), prepared by Urban Crossroads (March 27, 2023) (Urban Crossroads, 2023e), which is included in its entirety in Appendix H of this Initial Study and summarized herein.

Global Climate Change (GCC) is defined as the change in average meteorological conditions on the Earth with respect to temperature, precipitation, and storms. The majority of scientists believe that the climate shift taking place since the Industrial Revolution is occurring at a quicker rate and magnitude than in the past. Scientific evidence suggests that GCC is the result of increased concentrations of GHGs in the Earth's atmosphere, including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases, which are further described, along with health effects, in Section 2.3 of the GHG Analysis included in Appendix H of this Initial Study. The majority of scientists believe that this increased rate of climate change is the result of GHGs due to human activity and industrialization over the past 200 years. The effects of climate change in California related to public health, water resources, agriculture, forests and landscapes, rising sea levels, and human health are described in Section 2.6 of the GHG Analysis included in Appendix H.

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

The CARB compiles GHG inventories for the State of California. Based upon the 2022 GHG inventory data (i.e., the latest year for which data are available) for the 2000-2020 greenhouse gas emissions inventory, California emitted 369.2 million metric tons of carbon dioxide equivalent (MMTCO₂e) per year or 369,200 Gg CO₂e (6.17 percent of the total United States GHG emissions).

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

There are no PVCCSP Standards and Guidelines specifically related to GHG emissions included in the PVCCSP. However, PVCCSP EIR mitigation measures MM Air 4, MM Air 5, MM Air 6, MM Air 11, MM Air 13, MM Air 14, MM Air 19, and MM Air 20 presented in the Air Quality section of

this Initial Study, which are applicable to the Project would serve to reduce GHG emissions. However, as a conservative measure, the emissions presented in the Project's GHG Analysis do not reflect implementation of these mitigation measures.

EXPLANATION OF CHECKLIST ANSWERS

8a. Less Than Significant Impact. For GHG emissions and global warming, there is not, at this time, one established, universally agreed-upon "threshold of significance" by which to measure an impact. While the CARB published some draft thresholds in 2008, they were never adopted, and the CARB recommended that local air districts and lead agencies adopt their own thresholds for GHG impacts.

In the absence of other thresholds of significance promulgated by the SCAQMD, the City of Perris has been using the SCAQMD's adopted 10,000 MTCO₂e threshold for industrial projects and the SCAQMD's draft thresholds for non-industrial projects the purpose of evaluating the GHG impacts associated with proposed general development projects. The City's evaluation of impacts under the 10,000 MTCO₂e/year threshold is also considered to be conservative since it is being applied to all of the GHG emissions generated by the Project (i.e., area sources, energy sources, vehicular sources, solid waste sources, and water sources) whereas the SCAQMD's 10,000 MTCO₂e/year threshold applies only to the new stationary sources generated at industrial facilities.

In May 2022, the SCAQMD, in conjunction with the CAPCOA and other California air districts, released the latest version of the California Emissions Estimator Model™ (CalEEMod v2022.1). The purpose of this model is to calculate construction-source and operational-source criteria pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to estimate GHG emissions. Output from the model runs for construction and operational activity are provided in Appendices 3.1 of Appendix H. CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, on-site cargo handling, water supply/treatment/distribution, solid waste, and refrigerants. The methods and assumptions used to calculate the Project's GHG emissions are also described in detail in the GHG Analysis included in Appendix H.

Construction

Construction activities associated with the Project are summarized in Section 2.2.5 of this Initial Study and described in the Air Quality Impact Analysis included in Appendix A of this Initial Study. For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life, then adding that number to the annual operational phase GHG emissions. As such, construction emissions from the Project were amortized over a 30-year period (estimated to be 18.01 MTCO₂e per year) and added to the annual operational phase GHG emissions (refer to Table 3-4 of the GHG Analysis for a breakdown of GHG emissions).

Operations

As previously discussed in Section 2.1, until July 2022, the Project site was occupied by GRFCO, which operated various industrial uses onsite between 1984 and 2022. The Project site is currently being leased for truck trailer storage; this use occupied the northern and eastern portion of the Project site since 2018 and began leasing the southwestern portion of the Project site in July 2022 when GRFCO vacated the property. These uses currently and have historically generated GHG emissions from operations. As discussed in Section 3.6.9 of the GHG Analysis, the uses onsite, at the time the environmental analysis commenced in late 2021, generated 911.39 MTCO₂e/yr. The majority of the existing GHG emissions were associated with mobile source emissions, which were determined based on driveway counts taken at the Project site on December 1 and 2, 2021.

Operational activities associated with the Project would result in emissions of CO_2 , CH_4 , and N_2O from the following primary sources, which are described in detail in Section 3.6 of the GHG Analysis included in Appendix H: amortized construction emissions; area source emissions; energy source emissions; mobile source emissions; onsite cargo handling equipment emissions; solid waste; refrigerants; and water/treatment/distribution usage. As shown in Table 3-9, the Project would result in a net increase of approximately 2,237.36 MTCO $_2$ e per year. As such, the Project would not exceed the SCAQMD's numeric threshold of 10,000 MTCO $_2$ e per year for industrial projects. Thus, Project-related emissions would not have a significant direct or indirect impact on GHG and climate change.

TABLE 3-9 ESTIMATED TOTAL ANNUAL GREENHOUSE GAS EMISSIONS

Emission Source	Emissions (MT/yr)				
	CO ₂	CH₄	N ₂ O	R	Total CO₂e
Amortized Construction Emissions	17.77	6.67E-04	6.67E-04	1.07E-02	17.98
Mobile Source	2,240.00	0.06	0.26	2.98	2,322.00
Area Source	5.35	< 0.005	< 0.005	0.00	5.37
Energy Source	521.00	0.05	< 0.005	0.00	523.00
On-Site Equipment					47.37
Water Usage	86.10	1.99	0.05	0.00	150.00
Waste	22.80	2.28	0.00	0.00	79.90
Refrigerants	0.00	0.00	0.00	1.14	1.14
Diesel Fire Water Pump Generator	1.95	< 0.005	< 0.005	0.00	1.96
Total CO₂e (All Sources)	3,148.75				
Existing Emissions	911.39				
Total Net CO₂e (All Sources)	2,237.36				

CalEEMod output, See Appendix 3.1 of the GHG Analysis included in Appendix H for detailed model outputs.

Source: (Urban Crossroads, 2023e, Table 3-8)

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

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

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

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

State Regulations

Assembly Bill 32

The California State Legislature enacted AB 32, which requires that GHGs emitted in California be reduced to 1990 levels by the year 2020 (this goal has been met). GHGs as defined under AB 32 include CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆. Since AB 52 was enacted, a seventh chemical, NF₃, has also been added to the list of GHGs. CARB is the state agency charged with monitoring and regulating sources of GHGs. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 states the following:

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

Senate Bill 32 and 2017 CARB Scoping Plan

On September 8, 2016, Governor Brown signed SB 32 and its companion bill, AB 197. SB 32 requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80% below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature.

In November 2017, the CARB released the final 2017 Scoping Plan Update, which identifies the State's post-2020 reduction strategy. The 2017 Scoping Plan Update reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Key programs that the proposed Second Update builds upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce methane emissions from agricultural and other wastes.

The 2017 Scoping Plan establishes a new emissions limit of 260 MMTCO₂e for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

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

In addition to the statewide strategies, the 2017 Scoping Plan also identifies local governments as essential partners in achieving the State's long-term GHG reduction goals and identifies local actions to reduce GHG emissions. As part of the recommended actions, the CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 MTCO₂e or less per capita by 2030 and 2 MTCO₂e or less per capita by 2050. For CEQA projects, the CARB states that lead agencies may develop evidenced-based bright-line numeric thresholds—consistent with the Scoping Plan and the State's long-term GHG goals—and projects with emissions over that amount may be required to incorporate onsite design features and mitigation measures that avoid or minimize project emissions to the degree feasible; or a performance-based metric using a climate action plan or other plan to reduce GHG emissions as appropriate.

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

2022 CARB Scoping Plan

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the State to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with CEQA Guidelines section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation - the regulations that will impact this sector are adopted and enforced by CARB on vehicle

manufacturers and outside the jurisdiction and control of local governments. As stated in the Plan's executive summary:

"The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on and accelerating carbon reduction programs that have been in place for a decade and a half. That means rapidly moving to zero-emission transportation; electrifying the cars, buses, trains, and trucks that now constitute California's single largest source of planet-warming pollution."

"[A]pproval of this plan catalyzes a number of efforts, including the development of new regulations as well as amendments to strengthen regulations and programs already in place, not just at CARB but across state agencies."

Project Consistency Analysis

The 2017 Scoping Plan reflects the 2030 target of a 40% reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. It should be noted that the Project's consistency with the 2017 Scoping Plan also satisfies consistency with AB 32 since the 2017 Scoping Plan is based on the overall targets established by AB 32. Table 3-10 summarizes the Project's consistency with the 2017 Scoping Plan. As shown, the Project would not conflict with any of the 2017 Scoping Plan elements as any regulations adopted would apply directly or indirectly to the Project. Further, recent studies show that the State's existing and proposed regulatory framework would allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030.

TABLE 3-10 2017 SCOPING PLAN CONSISTENCY SUMMARY

Action	Responsible Parties	Consistency
Implement SB 350 by 2030		
Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and ensure grid reliability.		Consistent. The Project would use energy from Southern California Edison (SCE). SCE has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. The Project would not interfere with or obstruct SCE energy source diversification efforts.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030. Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in Integrated Resource Planning (IRP) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly- owned utilities meet GHG	CPUC, CEC, CARB	Consistent. The Project would be constructed in compliance with applicable California Building Code requirements. Specifically, new buildings must achieve compliance with 2022 Building and Energy Efficiency Standards and the 2022 California Green Building Standards requirements, or the applicable standards in place at the time building permit submittals are made. The proposed Project includes energy efficient field lighting and fixtures that

Action	Responsible Parties	Consistency
emissions reductions planning targets through a combination of measures as described in IRPs.		meet the current Title 24 Standards throughout the Project Site and would be a modern development with energy efficient boilers, heaters, and air conditioning systems.
Implement Mobile Source Strategy (Cle	eaner Technology ar	nd Fuels)
At least 1.5 million zero emission and plug-in hybrid light-duty EVs by 2025.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2025 targets. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and will therefore comply with the strategy.
At least 4.2 million zero emission and plug-in hybrid light-duty EVs by 2030.	CARB, California State Transportation	Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB zero emission and plug-in hybrid light-duty EV 2030 targets. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and will therefore comply with the strategy.
Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations.	Council (SGC), California Department of Transportation (Caltrans), CEC, OPR, Local Agencies	Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean cars regulations. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and will therefore comply with the strategy.
Medium- and Heavy-Duty GHG Phase 2.		Consistent. This is a CARB Mobile Source Strategy. The Project would not obstruct or interfere with CARB efforts to implement Medium- and Heavy-Duty GHG Phase 2. As this is a CARB enforced standard, vehicles that access the Project are required to comply with the standards and will therefore comply with the strategy.

Action	Responsible Parties	Consistency
Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20% of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100% of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO _X standard.		Consistent. The Project would not obstruct or interfere with agency efforts to transition to a suite of to-bedetermined innovative clean transit options.
Last Mile Delivery: New regulation that would result in the use of low NO _X or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5% of new Class 3-7 truck sales in local fleets starting in 2020, increasing to 10% in 2025 and remaining flat through 2030.		Consistent. The Project would not obstruct or interfere with agency efforts to use low NO _X or cleaner engines or the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California.
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		Consistent. This Project would not obstruct or interfere with implementation of SB 375 and would therefore not conflict with this measure.
Increase stringency of SB 375 Sustainable Communities Strategy (2035 targets).	CARB	Consistent. The Project would not obstruct or interfere with agency efforts to increase stringency of SB 375 Sustainable Communities Strategy.
Harmonize project performance with emissions reductions and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).	CalSTA, SGC, OPR, CARB, Governor's Office of Business and Economic Development (GO-Biz), California Infrastructure and Economic Development Bank (IBank),	Consistent. The Project would not obstruct or interfere with agency efforts to harmonize transportation facility project performance with emissions reductions, increase competitiveness of transit and active transportation modes, implementation of sidewalks/Class I shared use trails, and bus stops.

Action	Responsible Parties	Consistency
	Department of Finance (DOF), California Transportation Commission (CTC), Caltrans	
By 2019, develop pricing policies to support low-GHG transportation (e.g., low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR, SGC, CARB	Consistent. The Project would not obstruct or interfere with agency efforts to develop pricing policies to support low-GHG transportation.
Implement California Sustainable Freig	ht Action Plan	
Improve freight system efficiency.	CalSTA, CalEPA, CNRA, CARB,	Consistent. This measure would apply to all trucks accessing the Project site, this may include existing trucks or new trucks that are part of the statewide goods movement sector. The Project would not obstruct or interfere with agency efforts to Improve freight system efficiency.
Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	Caltrans, CEC, GO-Biz	Consistent. The Project would not obstruct or interfere with agency efforts to deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.
Adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.	CARB	Consistent. When adopted, this measure would apply to all fuel purchased and used by the Project in the state. The Project would not obstruct or interfere with agency efforts to adopt a Low Carbon Fuel Standard with a Carbon Intensity reduction of 18%.
Implement the Short-Lived Climate Pol		PS) by 2030
40% reduction in methane and hydrofluorocarbon emissions below 2013 levels. 50% reduction in black carbon emissions	CARB, CalRecycle, CDFA, California State Water Resource Control Board	Consistent. The Project would not obstruct or interfere with agency efforts to reach a 40% reduction in methane and hydrofluorocarbon emissions below 2013 levels or 50% reduction in black carbon emissions below 2013
By 2019, develop regulations and programs to support organic waste	(SWRCB), Local Air Districts CARB, CalRecycle, CDFA, SWRCB,	Consistent. The Project would not obstruct or interfere with agency efforts to develop regulations and programs to

Action	Responsible Parties	Consistency			
landfill reduction goals in the SLCP and SB 1383.	Local Air Districts	support organic waste landfill reduction goals in the SLCP and SB 1383.			
Implement the post-2020 Cap-and- Trade Program with declining annual caps.	CARB	Consistent. Cap-and-Trade Program provisions do not apply to this Project. The Project would not obstruct or interfere agency efforts to implement the post-2020 Cap-and-Trade Program.			
By 2018, develop Integrated Natura California's land base as a net carbon		nds Implementation Plan to secure			
Protect land from conversion through conservation easements and other incentives.		Consistent. The Project would not obstruct or interfere with agency efforts to protect land from conversion through conservation easements and other incentives. It should also be noted that the Project site is not an identified property that needs to be conserved.			
Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.	CNRA, Departments Within CDFA, CalEPA, CARB	Consistent. The Project site is disturbed property with existing development and does not comprise an area that would effectively provide for carbon sequestration. The Project would not obstruct or interfere agency efforts to increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.			
Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.		Consistent. To the extent appropriate for the proposed building, wood products would be used in construction, including for the roof structure. Additionally, the Project includes landscaping, including.			
Establish scenario projections to serve as the foundation for the Implementation Plan.		Consistent. The Project would not obstruct or interfere with agency efforts to establish scenario projections to serve as the foundation for the Implementation Plan.			
Implement Forest Carbon Plan	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and Departments Within	Consistent. The Project would not obstruct or interfere with agency efforts to implement Forest Carbon Plan.			
	State Agencies & Local Agencies	Consistent. The Project would not obstruct or interfere with agency efforts			

Action	Responsible Parties	Consistency
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.		to fund and finance mechanisms to support GHG reductions across all sectors.

Source: (Urban Crossroads, 2023e, Table 3-9)

2022 CARB Scoping Plan Consistency

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the Project would comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. Further, the Project would implement PVCCSP EIR mitigation measures MM Air-4 through MM Air-20 which are discreet mitigation measures aimed at reducing GHG emissions. As noted in the analysis herein, compliance with these mitigation measures will ensure that the Project would be consistent with the Perris CAP through compliance with the PVCCSP EIR mitigation measures and regulatory requirements. PVCCSP EIR mitigation measure MM Air-18 would improve the local public transit network by accommodating future bus turnouts at locations established through consultation with the Riverside Transit Agency. Additionally, PVCCSP EIR mitigation measures MM Air-11 through MM-AQ-20 will further reduce Project GHG emissions and VMT, including increased implementation and availability of vehicle and equipment electrification. Transportation Demand Management programs, and optimization of vehicle access and activity. The Project would also result in a less than significant VMT impact as further discussed in the Transportation section of this Initial Study. As such, the Project would not be inconsistent with the 2022 Scoping Plan.

Title 24 Energy Efficiency Standards and California Green Building Standards

As previously discussed in the Energy section of this Initial Study, California Code of Regulations Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The 2022 version of Title 24 Energy Code was adopted by the CEC and became effective on January 1, 2023. The Project would be required to comply with the applicable Title 24 standards in place at the building permit applications are submitted.

CALGreen Code is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect on January 1, 2009, and is administered by the CBSC. The most recent approved update consisting of the 2022 CALGreen Code also became effective on January 1, 2023. Local jurisdictions are permitted to adopt more stringent requirements, as state law provides methods for local enhancements.

The CEC anticipates that the 2022 Energy Code and CALGreen Code will provide \$1.5 billion in consumer benefits and reduce GHG emissions by 10 million metric tons. The Project would be required to comply with the applicable standards in place at the time building permit document submittals are made, including those previously listed in the Energy section of this Initial Study. As previously identified, the CBC provides the minimum standard that buildings must meet in order to be certified for occupancy, and adherence to these requirements is confirmed by the City during the respective Project approvals. Therefore, no impact would occur.

City of Perris Climate Action Plan

The City of Perris Climate Action Plan (CAP) was adopted by the City Council (Resolution Number 4966) on February 23, 2016. The CAP was developed to address GCC through the reduction of harmful GHG emissions at the community level, and as part of California's mandated statewide GHG emissions reduction goals under AB 32. Perris' CAP, including the GHG inventories and forecasts contained within, is based on Western Riverside Council of Government's (WRCOG) Subregional CAP. The Perris CAP utilized WRCOG's analysis of existing GHG reduction programs and policies that have already been implemented in the subregion and applicable best practices from other regions to assist in meeting the 2020 subregional reduction target. The CAP reduction measures chosen for the City's CAP were based on their GHG reduction potential, cost-benefit characteristics, funding availability, and feasibility of implementation in the City of Perris. The CAP used an inventory base year of 2010 included emissions from the following sectors: residential commercial/industrial energy, transportation, waste, and wastewater. The CAP's 2020 reduction target is 15 percent below 2010 levels, and the 2035 reduction target is 47.5 percent below 2010 levels. The City of Perris is expected to meet these reduction targets through implementation of Statewide and local measures. Beyond 2020, Executive Order S-03-05 calls for a reduction of GHG emissions to a level 80 percent below 1990 levels by 2050.

Local measures incorporated in the CAP include:

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

The Project would comply with the CAP through compliance with the PVCCSP EIR mitigation measures and regulatory requirements, which would lessen the Project's contribution of GHG emissions from both construction and operation. The Project would not conflict with local strategies and state/regional strategies listed in the Perris CAP. Although the CAP has a reduction target year of 2020, these emission reduction measures would still result in lower emissions for the life of the Project and the proposed Project would remain in compliance with the CAP. Further, the Project is subject to CBC requirements. New buildings must meet the applicable building code requirements and standards in place at the time building permits are issued. CALGreen is updated on a regular basis, with the most recent approved 2022

California Green Building Code Standards taking effect on January 1, 2023. The Project would be required to comply with the applicable Title 24 standards in place at the time of building permit submittals. While the Project does not include reduced parking, or increased density, it would provide sidewalks, bike racks, and pedestrian walkways to encourage the use of alternative modes of transportation (walking and biking). As such, the Project would not conflict with applicable GHG reduction measures in the CAP and a less than significant impact is expected to occur.

9. HAZARDS AND HAZARDOUS MATERIALS

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			\boxtimes	
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?				\boxtimes
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e)	For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?				
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

Airport Overlay Zone (from Chapter 12.0 of the PVCCSP)

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

12.1.3 Compatibility with March ARB/IP ALUCP

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

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

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

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

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.

MM Haz 7

Prior to any excavation or soil removal action on a known contaminated site, or if contaminated soil or groundwater (i.e., with a visible sheen or detectable odor) is encountered, complete characterization of the soil and/or groundwater shall be conducted. Appropriate sampling shall be conducted prior to disposal of the excavated soil. If the soil is contaminated, it shall be properly disposed of, according to Land Disposal restrictions. If site remediation involves the removal of contamination, then contaminated

material will need to be transported off site to a licensed hazardous waste disposal facility. If any implementing development projects require imported soils, proper sampling shall be conducted to make sure that the imported soil is free of contamination.

EXPLANATION OF CHECKLIST ANSWERS

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

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

Impact Analysis for Temporary Construction Activities

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

Impact Analysis for Long-Term Operational Activities

Operation of the proposed industrial building would involve the use of materials common to all urban development that are labeled hazardous (e.g., solvents and commercial cleansers; petroleum products; and pesticides, fertilizers, and other landscape maintenance materials). There is the potential for routine use, storage, or transport of other hazardous materials; however, the precise materials are not known,

as the tenants of the proposed building are not yet defined. The manufacturing use onsite would be limited to indoor assembly/manufacturing, and retail related to manufacturing, whereby all uses would be only for non-hazardous materials. However, in the event that hazardous materials, other than those common materials described above, are associated with future warehouse and indoor manufacturing operations, the hazardous materials would only be stored and transported to and from the site.

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

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

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

Accidents involving hazardous materials that could pose a significant hazard to the public or the environment would be highly unlikely during the construction and long-term operation of the Project and are not reasonably foreseeable. As discussed above under Threshold 9a, the transport, use, and handling of hazardous materials on the Project site during construction is a standard risk on all construction sites, and there would be no greater risk for upset and accidents than would occur on any other similar construction site. Upon buildout, the Project would operate as a warehouse and indoor manufacturing facility. Based on the operational characteristics of the proposed uses, it is possible that hazardous materials could be used during the course of a future occupant's routine, daily operations; however, as discussed above under Threshold 9a, the Project would be required to comply with all applicable local, State, and federal regulations related to the transport, handling, and usage of hazardous materials. Accordingly, impacts associated with the accidental release of hazardous materials

would be less than significant during both construction and long-term operation of the Project.

A Phase I Environmental Site Assessment (ESA) was prepared by Ramboll US Consulting, Inc. (Ramboll) for the Project site titled *Phase I Environmental Site Assessment Patterson Commerce Center Southwest Corner of the Intersection of Nance Street and Wade Avenue Perris, California* (Phase I ESA) (July 2022) (Ramboll, 2022a). The report is included in Appendix I1 of this Initial Study and is summarized herein. The Phase I ESA was prepared in accordance with ASTM International E 1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process and the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (AAI) (40 Code of Federal Regulations Part 312). The objective of a Phase I ESA is to identify, to the extent feasible pursuant to ASTM Standard E 1527-13, recognized environmental conditions (RECs)¹³.

Recognized Environmental Conditions and De Minimis Conditions

The Phase I ESA did not identify any RECs, Controlled Recognized Environmental Conditions (CRECs)¹⁴, or Historical Recognized Environmental Conditions (HRECs)¹⁵ on the Project site. De minimis conditions, which are those that do not represent a material risk of harm to the public health of the environment were identified related to onsite septic systems, previous mining of sand from the site, and temporary soil stockpiling from offsite properties.

March Air Reserve Base

With the exception of MARB, no environmental concerns were identified related to the adjacent or surrounding properties. MARB is listed on the National Priorities List (NPL) and Superfund Enterprise Management System (SEMS) with active status. The property is contaminated with VOCs (primarily tetrachloroethene [PCE], trichloroethylene [TCE]), and polychlorinated biphenyls [PCBs]). The extent of groundwater contamination in 2012 was delineated to with approximately one mile northeast and cross-gradient of the Project site. The contamination is being addressed with regulatory oversight. Because of the one-mile distance between the groundwater contaminant plume, the direction of the groundwater flow, and regulatory oversight, this listing is not considered to be a significant environmental concern to the Project site (Ramboll, 2022a).

Previous Onsite Uses

Although not identified as RECs, the following additional findings related to potential contamination concerns from previous onsite uses were identified in the Phase I ESAs:

¹³ RECs are defined by ASTM as "the presence or likely presence of any hazardous substance or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property."

¹⁴ A CREC is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), but with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

¹⁵ An HREC is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

Equipment Washing and Fleet Maintenance Operations. Until recently vacating the site, GRFCO conducted equipment washing using a pressure washer in the southwest portion of the Project site. Equipment wash water was discharged to unpaved soil surface. Moderate soil staining was observed near the equipment washing area, and small pools of water appeared to have an oily sheen and appeared dark and oily. Additionally, a 5-gallon bucket of nonchlorinator degreaser and other small quantity unlabeled containers were observed in the equipment washing area. GRFCO also conducted fleet maintenance operations (e.g., fluid changes and fueling) at the site. No chlorinated solvents are currently used and there is no known historical use of chlorinated solvents at the Project site. Visual evidence of staining was observed near the fleet maintenance shop and moderate oily staining on the concrete in the hazardous materials storage area; however, the concrete is in fair condition with no visual evidence of major deterioration or cracking. Staining did not appear to extend to floor drains or storm water drains, and only minor staining (less than one square-foot) was observed on unpaved oils. The site is not listed on any databases indicating potential know contamination issues and there is no current regulatory scrutiny related to contamination matters, nor any regulatory drive to investigate the site. Notwithstanding, the possibility of inadvertent spills or releases of petroleum products may have occurred in the past (Ramboll, 2022a).

Based on the findings of the Phase I ESA, a limited Phase II subsurface investigation (included in Appendix I2 of this Initial Study) was performed during which soil sampling was conducted. Five soil borings (RSB1 through RSB5) were advanced using a hand auger and completed to depths of approximately 5 feet below ground surface. No VOCs were detected in any of the soil samples analyzed at concentrations above their respective laboratory reporting limits. Total petroleum hydrocarbons (TPH) gasoline range organics (GRO) (TPH-GRO) was detected in soil samples collected from four of the soil boring (RSB2 through RSB5) and TPH oil range organics (TPH-ORO) was detected in two samples collected from borings RSB4 and RSB5 (former equipment washing area). All detections of TPH-GRO and TPH-ORO were below the most conservative California Department of Toxic Substances Control Screening Levels (DTSC-SLs) of 97 and 2,400 milligram per kilogram (mg/kg), respectively. Detections of TPH-DRO were reported in four samples collected from soil borings RSB3, RSB4, and RSB5 (former above ground storage tank [AST] and former equipment washing areas). All four detections were below the commercial/industrial DTSC-SL of 500 mg/kg. As such, because the Project site is proposed to be redeveloped with an industrial use and none of the detections exceed the commercial/industrial SLs, no further action is warranted. (Ramboll, 2022b)

• Past Use of the Site for Residential Purposes and Agricultural Farming. The Project site was previously used for agricultural purposes or residences from at least 1938 until the 1960s and 1970s when the site appeared to be occupied by a mix of residences and exterior storage for unknown materials. Due to the Project site's historic agricultural use, there is a potential that agricultural chemicals were applied on the site and there is a potential for residual concentrations to be present in the subsurface. Additionally, the residences and outbuildings may have used aboveground or underground fuel oil tanks for heating purposes and for farm vehicle fueling. The historic agricultural use is unlikely to result in regulatory scrutiny, as the Project does not propose residential uses on the Project site. (Ramboll, 2022a)

The potential for exposure of construction workers and other individuals to contaminated soils from past onsite activities, PVCCSP EIR mitigation measure MM Haz 7 would be implemented and would address the potential presence of contaminated soil through appropriate sampling and testing, disposal, and/or remediation. With implementation of PVCCSP EIR mitigation measure MM Haz 7, this impact would be less than significant, and no additional mitigation in required.

Building Materials

Asbestos, a naturally occurring fibrous material, was used for years in many building materials for its fire-proofing and insulating properties. While the use of asbestos in the manufacture of most building materials has not been fully prohibited by law, the use of asbestos, for the most part, has voluntarily been discontinued since the late 1970s. Loose insulation, ceiling panels, and brittle plaster are potential sources of friable (easily crumbled) asbestos. Nonfriable asbestos is generally bound to other materials such that it does not become airborne under normal conditions. Any activity that involves cutting, grinding, or drilling during demolition can release friable asbestos fibers unless proper precautions are taken. Inhalation of airborne fibers is the primary mode of asbestos entry into the body, which makes friable materials the greatest potential health risk. Asbestos is a known human carcinogen and there is no known threshold level of exposure at which adverse health effects are not anticipated. Given this, the U.S. Environmental Protection Agency (USEPA) and CalEPA have identified asbestos as a hazardous air pollutant pursuant to Section 12 of the Federal Clean Air Act. Further, CARB has identified asbestos as a toxic air contaminant (TAC) pursuant to the California Health and Safety Code (Section 39650 et seq.).

Lead is a naturally occurring metallic element. Among its numerous uses and sources, lead can be found in paint; water pipes, solder in plumbing systems; and structures painted with LBP. In 1978, the Consumer Products Safety Commission banned paint and other surface coating materials containing lead. Because of its toxic properties, lead is regulated as a hazardous material. Inorganic lead is also regulated as a TAC.

Due to the age of the onsite buildings (construction before 1978), it is possible that asbestos containing materials and lead based paint is present, and could be released during demolition activities. However, these materials would be removed in accordance with regulatory requirements prior to demolition. In California, lead and asbestos abatement must be performed and monitored by contractors with appropriate certifications from the California Department of Health Services (DHS). In addition, CalOSHA has regulations to protect worker safety during potential exposure to lead and asbestos under Title 8 of the California Code of Regulations (Section 1529, Asbestos and Section 1532.1, Lead). Demolition that could result in the release of asbestos and lead must be conducted according to CalOSHA standards. These standards were developed to protect the general population and construction workers from respiratory and other hazards associated with exposure to these materials. Further, adherence to SCAQMD Rule 1403, Asbestos Emissions is required, which establishes survey, notification, and work practice requirements to prevent asbestos emissions during building demolition demolition to applicable regulatory

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¹⁶ The purpose of SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities, is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste

requirements, impacts associated with the potential release of hazardous building materials during demolition activities would be less than significant impact and no mitigation is required.

In summary, impacts associated with the accidental release of hazardous materials would be less than significant during both construction and long-term operation of the Project. No additional Project-level mitigation in required.

- **9c. No Impact.** Val Verde High School, Val Verde Academy and the Val Verde Regional Learning Center are located approximately 1.0 mile southeast of the Project site and would not be along the Project's designated truck route (Patterson Avenue north to Harley Knox Boulevard). No impact related to emissions of hazardous materials within one-quarter mile of a school would occur with implementation of the Project and no mitigation is required.
- 9d. No Impact. The Phase I ESA prepared for the project includes a summary of listings in federal and State agency databases for the site and facilities within applicable radii of the Project site, as specified by the ASTM standard, and provided by EDR in July and November of 2021 (Ramboll, 2022a). Based on the information provided in the Phase I ESA, and review of the California Environmental Protection Agency (CalEPA) Cortese List Data Resources (DTSC, 2022), the Project site is not located on any list of hazardous materials sites compiled pursuant to Government Code Section 659625. Accordingly, no impact would occur and no mitigation is required.
- 9e. Less Than Significant with Mitigation Incorporated. The Project site is located approximately 0.6 mile southwest of MARB/IPA and is subject to the MARB/IPA ALUCP adopted by the Riverside County Airport Land Use Commission (ALUC) in November 2014 (RCALUC, 2014). The City of Perris prepared and adopted an Airport Overlay Zone in 2016 to make the City's General Plan consistent with the 2014 ALUCP. In 2018, MARB published an update to the MARB's Air Installation Compatible Land Use Zone (AICUZ) study that has not yet been incorporated into the 2014 ALUCP (AFRC, 2018). The 2018 AICUZ study provides new noise contours and information on accident potential. It does not change the dimensions of the clear zones or accident potential zones that are the basis for the ALUCP's compatibility zones used to evaluate land use compatibility.

The MARB/IPA ALUCP divides the area close to the airport into zones based on proximity to the airport and perceived risks. The Project site is within Zone C-1 (Primary Approach/Departure Zone), as shown in Map MA-1, Compatibility Map, in the MARB/IPA ALUCP. According to Table MA-1, Compatibility Zone Factors, of the MARB/IPA ALUCP, the risk level associated with Zone C-1 is moderate since it is on the periphery of flight corridors. Zone C1 allows a non-residential, average land use intensity of 100 people per acre and a single-acre land use intensity of 250 people per any single acre. Table 3-11 provides the average land use intensity calculation used for the Project. The Project site is conservatively estimated to have total occupancy of 658 people 17, which results in an average intensity of approximately 47.6 people per

materials. All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

¹⁷ The occupancy estimate used for this airport compatibility assessment exceeds the anticipated occupancy based on the employment generation factors presented in the PVCCSP EIR (refer to the Population and Housing section of this Initial Study). Additionally, if the building occupant/tenant can be considered e-commerce or fulfillment, then the occupancy calculation can reduce the number of people on the site by 50 percent (March ALUCP Section 2.4).

acres. This average occupancy is below the 100 people per acre average intensity allowed in Zone C1.

TABLE 3-11 AVERAGE PROJECT LAND USE INTENSITY CALCULATION

Land Use	Occupancy Rate (persons per sf) ¹	Building Size (sf)	Occupancy (total people)
Office/Mezzanine	1 person/100	16,304	163
Warehouse/Manufacturing	1 person/500	247,516	495
	Total	263,820	658

^{1.} California Building Code, Section 1004 Occupant Load, Table 1004.1.2 (also cited in Riverside County Airport Land Use Compatibility Plan, Appendix C. Determining Concentrations of People (Adopted, October 14, 2004) Source: (RCALUC, 2004)

The single-acre intensity calculation assumes occupancy of one ground floor office (5,000 square feet) and the mezzanine combined with the remainder of the single acre in warehouse use. Additionally, as shown on Table 3-12, the Project would result in a maximum single-acre occupancy of 206.1 people, which is less than the 250 people per single acre standard. Therefore, the Project would not result in a safety hazard or people residing or working in the Project area.

As identified on Table MA-2 of the 2014 MARB/IPA ALUCP, the ALUCP prohibits certain types of uses within Compatibility Zone C1: children's school, day care centers, libraries, hospitals, congregate care facilities, place of assembly, noise-sensitive outdoor non-residential uses. The Project does not involve any of these prohibited uses.

TABLE 3-12 SINGLE-ACRE LAND USE INTENSITY CALCULATION

Land Use	Occupancy Rate (persons per sf) ¹	Building Size (sf)	Occupancy (total people)
Office/Mezzanine	1 person/100	12,924	129
Warehouse/Manufacturing	1 person/500	38,560	77.1
	Total	43,560	206.1

^{1.} California Building Code, Section 1004 Occupant Load, Table 1004.1.2 (also cited in Riverside County Airport Land Use Compatibility Plan, Appendix C. Determining Concentrations of People (Adopted, October 14, 2004) Source: (RCALUC, 2004)

Hazards to flight are prohibited in Compatibility Zone C1. Relevant to the Project, this includes physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations. Additionally, land use development that may cause the attraction of birds to increase is also prohibited.

The Project site is within the Federal Aviation Regulations Part 77 (FAA 2017) Military Surfaces area (refer to Map MA-2, Airspace Protection Surfaces, of the MARB/IPA ALUCP) and specifically within the Military Surfaces that extends up to an elevation of 1,685 feet amsl over the Project site. The Project Applicant proposes a maximum 46 feet 6-inch-high industrial building. As previously discussed, the highest elevation at the Project site is 1,513 feet above mean sea level. The proposed building height in conjunction with the Project site's highest elevation would result in a total elevation of approximately 1,560 feet above mean sea level. Therefore, the proposed building would not exceed the 1,685-foot elevation threshold and extend into the Airspace Protection Surfaces for MARB/IPA. Within Zone C-1, buildings over 70 feet tall require airspace review. Additionally, Construction equipment (i.e., crane) at the site would not encroach into the imaginary surface that would require FAA notification. The FAA

made a "Determination of No Hazard to Air Navigation" for the proposed building (FAA, 2022b). As such, the Project would not require notification of the FAA pursuant to Part 77 of the Federal Aviation Regulations (FAA, 2022a). Therefore, the Project has complied with PVCCSP EIR mitigation measure MM Haz 6.

The Project also incorporates PVCCSP EIR mitigation measures MM Haz 2 through MM Haz 5, which reflect the PVCCSP Standards and Guidelines addressing MARB/IPA requirements outlined in the ALUCP, including these hazards to flight. Consistent with PVCCSP EIR mitigation measure MM Haz 5, which outlines prohibited uses, the proposed warehouse use would not involve an electromagnetic radiation component; steady of flashing lights that would be directed toward aircraft; conflict with MARB/IPA operations or radio communications (e.g., microwave transmission in conjunction with a cellular tower, radio wave transmission in conjunction with remote equipment); cause sunlight to be directed toward an aircraft; or, generate conditions that would affect safe air navigation, including water quality basins that retain water for more than 48 hours after a rainfall event. With respect to sunlight being directed toward an aircraft, as discussion in the Aesthetics section of this Initial Study, even if solar panels were installed across the entire warehouse roof, there would not be a glare impact to aircraft (Johnson Aviation, 2022). Further, PVCCSP EIR mitigation measure MM Haz 3 requires that outdoor lighting be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane, and PVCCSP EIR mitigation measure MM Haz 4 requires that all potential purchasers and tenants be notified that the property is located in the vicinity of an airport, within an AIA. The Project is required to comply with PVCCSP EIR mitigation measures MM Haz 3 through MM Haz 5 and, with incorporation of these mitigation measures, the Project would result in a less than significant impact due to proximity to the MARB/IPA. No additional mitigation is required.

As further discussed in the Noise section of this Initial Study, Compatibility Zone C1 is considered to have a moderate noise impact. The City's General Plan Noise Element land use/noise compatibility guidelines indicate that industrial uses, such as the Project, are considered normally acceptable with exterior noise levels of up to 70 dBA CNEL. The Project site is located outside the 65 dBA CNEL noise level contour boundaries for MARB/IPA and would not expose new sensitive noise land uses to the Project site.

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

As described in Section 2.2.2 of this Initial Study, implementation of the Project would include roadway improvements along Nance Street, Wade Avenue, Washington Street, and Patterson Avenue, consistent with the requirements of the PVCCSP. Emergency access to the Project would be provided via driveways along the site-adjacent roadways. Implementation of the circulation system pursuant to the PVCCSP would improve emergency access to the Project site and the area. Accordingly, operation of the Project would not impair implementation of or physically interfere with

an adopted emergency response plan or an emergency evacuation plan. This impact would be less than significant and no mitigation is required.

9g. No Impact. As identified in the PVCCSP EIR Initial Study (Section 9, Hazards and Hazardous Materials), the PVCCSP planning area, including the Project site, is not adjacent to any wildlands or undeveloped hillsides where wildland fires would be expected to occur, and Figure S-5, Wildfire Hazards, of the City's General Plan Safety Element does not designate the PVCCSP planning area as being at risk from wildfires (Perris, 2022c). The Project site would not be susceptible to wildfires and there would be no impact.

10. HYDROLOGY AND WATER QUALITY

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

The PVCCSP includes Standards and Guidelines relevant to water quality and hydrology. These Standards and Guidelines are summarized below, are incorporated as part of the Project, and are

assumed in the analysis presented in this section. No mitigation measures for hydrology and water quality are included in the PVCCSP EIR.

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

4.2 Onsite Standards and Guidelines

4.2.2 Site Layout for Commerce Zones

4.2.2.7 Water Quality Site Design

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

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

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

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

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

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

- Optimize the site layout
- Preserve existing drainage patterns
- Protect existing vegetation and sensitive areas

- Preserve natural infiltration capacity
- Minimize impervious area
- Disperse runoff to adjacent pervious areas
- Delineate drainage management areas
- Classify and tabulate Drainage Management Areas (DMAs) and determine runoff factors for
 - Self-treating areas
 - Self-retaining areas
 - Areas draining to self-retaining areas
 - Areas draining to BMPs

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

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

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

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

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

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

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

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

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

Covered Trash Enclosures. Trash enclosure covers must be provided.

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

8.2 Industrial Development Standards and Guidelines

8.2.1 Industrial Site Layout

8.2.1.8 Water Quality Site Design

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

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

EXPLANATION OF CHECKLIST ANSWERS

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

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

Construction Impacts

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

Because development of the Project site would involve grading of more than one acre, the Project proponent would be required to obtain coverage under the NPDES General

Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (NPDES No. CAS000002, Water Quality Order No. 2009-009-DWQ,18 or the latest approved Construction General Permit) and implement a Storm Water Pollution Prevention Plan (SWPPP) to reduce pollutants in the stormwater to the maximum extent practicable during construction. The SWPPP must include erosion-control and sediment-control BMPs that would meet or exceed measures required by the determined risk level of the construction site, in addition to tracking control, waste management, and non-stormwater control BMPs that reduce the potential for construction-related stormwater pollutants. These measures may include the use of gravel bags, silt fences, straw wattles, hay bales, check dams, hydroseed, or soil binders. The construction contractor would be required to install, implement, and maintain these BMPs throughout the duration of onsite construction activities. A Construction Site Monitoring Program that identifies stormwater monitoring and sampling requirements during construction is a required component of the SWPPP. In addition, the construction contractor would be required to maintain an inspection log and allow the log-on site to be reviewed by the City and representatives of the RWQCB. Thus, compliance with the NPDES Construction General Permit and implementation of the required SWPPP would avoid the violation of water quality standards or waste discharge requirements, as well as avoid the degradation of water quality during construction. Impacts would be less than significant and no mitigation is required.

Operational Impacts

To address post-construction erosion and pollutant discharge impacts to stormwater quality, a *Project Specific Final Water Quality Management Plan* (WQMP) has been prepared by Huitt-Zollars, Inc. (Huitt-Zollars, 2022a) (October 21, 2022), in compliance with Ordinance No. 1194 of the City of Perris and the Riverside County MS4 Permit, under which the City of Perris is a co-permittee. The Preliminary WQMP is provided in Appendix J of this Initial Study and is summarized herein. Currently, runoff from the Project site, which is disturbed and includes existing development in the southwest portion of the site, flows west to east in a sheet flow condition. The northern portion of the Project site drains to Patterson Avenue and flows to the south.

Under existing conditions approximately 14 percent of the Project site (85,000 square feet) includes impervious surfaces. With implementation of the Project, approximately 77 percent (473,909 square feet) of the Project site would include impervious surfaces. The impervious areas would be associated with the proposed building, parking areas, truck yard, walkways, drive aisles, sidewalks, roadways, and other surfaces that would reduce ground percolation and increase stormwater runoff. Potential pollutants of concern that could be generated by long-term operation of the proposed industrial Project include bacterial indicators, metals, nutrients, pesticides, toxic organic compounds (solvents), sediments, trash and debris, and oil and grease. These pollutants may lead to the degradation of stormwater quality in downstream water bodies, including Canyon Lake and Lake Elsinore.

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

Under the developed Project conditions, the Project site would have one drainage management area (DMA) for water quality purposes and flows would generally drain in the same direction as the existing condition (to the east). As shown on the post-construction BMP map provided on Exhibit 16, the onsite storm drain system would direct stormwater flows within the Project site to the proposed bioretention basin in the northeast portion of the Project site. This basin would be used to provide water quality treatment and peak storm mitigation. Excess volume would be detained and released at a controlled rate. The basin would use filter media, stone section, and a perforated pipe as its form of treatment. Onsite landscaped areas, not including the bioretention basin, would be self-treating.

The basin was designed to mitigate the post construction runoff to levels equivalent to the pre-Project conditions. Additionally, a number of permanent and operational source control BMPs are proposed and would include, but not be limited to, on-site storm drain inlet markings, loading docks inspection, fire sprinkler testing, sidewalk and parking lot sweeping, and trash enclosure design. The proposed BMPs would also serve to reduce pollutants in the runoff.

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

Groundwater Basin (SJGB), which underlies the valleys of San Jacinto, Perris, Moreno Valley, and Menifee in western Riverside County. This basin is bound by the San Jacinto Mountains, San Timoteo Badlands, Box Mountains, Santa Rosa Hills and Bell Mountain, and unnamed hills. Approximately 39 percent of the SJGB is adjudicated, 2 percent is under federal jurisdiction, and 59 percent is under jurisdiction of the Eastern Municipal Water District (EMWD). The Project site lies within the portion of the SJGB under the jurisdiction of the EMWD, which is known as the West San Jacinto Basin. Based on the boring samples taken by SCG and the moisture contents of the recovered soil samples, the groundwater table is considered to have existed at a depth in excess of 30 feet at the time of the subsurface exploration. The nearest monitoring well on record is located approximately 60 feet south of the Project site. Water level readings within this monitoring well indicate a groundwater level of approximately 67.1 feet below the ground surface in March 2021. (SCG, 2022)

Potable water service is provided to the City of Perris by the EMWD, which serves an approximately 555-square-mile area. The EMWD 2020 Urban Water Management Plan (UWMP) indicates that approximately 49 percent of its water supply consists of imported water purchased through Metropolitan Water District of Southern California (MWD) from the State Water Project and the Colorado River Aqueduct, with local supplies including potable groundwater (11 percent), desalinated groundwater (6 percent), and recycled water (34 percent) (EMWD, 2021b). Groundwater is not being proposed to serve the Project as the EMWD considers current groundwater production to be utilized exclusively by existing customers (EMWD, 2021b). Additionally, the Project would not involve direct withdrawals of groundwater. Therefore, groundwater

would not be used to serve the Project and the Project would not have the potential to substantially decrease groundwater supplies.

Natural recharge to the SJGB is primarily from percolation of flows in the San Jacinto River and its tributary streams, with percolation of water stored in Lake Perris as an additional source of recharge. The Project site is not within a designated groundwater recharge area. Although implementation of the Project would reduce the pervious areas available for potential natural recharge, the area of the Project site is relatively small (approximately 16.1-gross acres) in relation to the total size of the groundwater subbasin (248 square miles or 158,782 acres) (EMWD, 2021a), and the Project site's only source of water is from direct precipitation, providing little opportunity to recharge under existing conditions.

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

10c(i). Less than Significant Impact. No drainage courses are located within the Project site; therefore, the Project would not alter the course of a stream or river. Additionally, the existing local drainage pattern across the Project site would be retained (from west to east) and the Project's storm drain system would continue to direct off-site run-on flows from the adjacent portion of I-215, Wade Avenue, Washington Street, and the property to the immediate south to Patterson Avenue. A discussion of the post-development drainage pattern is described below under Threshold 10c(ii).

Provided below is a discussion of the Project's potential to increase erosion under construction conditions and operational conditions.

Construction Impacts

As discussed below, construction activities have the potential to increase erosion; however, erosion potential post-construction would be reduced.

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

Operational Impacts

Development of the Project would result in the conversion of onsite pervious surfaces to impervious surfaces. By increasing the amount of impervious surfaces on the site, more surface runoff would be generated and the rate and volume of runoff would increase. At the same time, sediments would be reduced with implementation of the Project as impervious surfaces, landscaped areas, and BMPs would reduce suspended sediment in runoff compared to the existing undeveloped conditions. Thus, onsite erosion would be less with the Project. As discussed under Threshold 10a above, to manage surface runoff, stormwater runoff would be directed to underground infiltration chambers, which would remove pollutants in the stormwater. Thus, impacts associated with the alteration of drainage patterns and erosion would be less than

significant with adherence to applicable local, regional, and State requirements. No mitigation is required.

Less than Significant Impact. A Final Hydrology Report for Rockefeller, Patterson 10c(ii). Commerce Center Development Plan Review 22-00003, has been prepared for the Project by Huitt-Zollars, Inc. (Hydrology Report) (October 14, 2022) (Huitt-Zollars, 2022b) and is included in Appendix K of this Initial Study. As described above. proposed grading and earthwork activities and the addition of impervious surfaces on the Project site would alter the site's existing interior drainage characteristics (shown on Exhibit 31) but would not substantially alter the drainage pattern of the local area. Under existing conditions, the Project site is divided into two DMAs (DMA A and B) It should be noted that the northern half of the Project site is tributary to Riverside County Flood Control & Water Conservation District (RCFC&WCD) Lateral B-6 and the southern half of the Project site is tributary RCFC&WCD Lateral B-5.2. Both of these storm drains drain to the Perris Valley Storm Drain. Currently, the southern half of the Project site accepts run-on from the adjacent portion of I-215, Wade Avenue, Washington Street, and the property to the immediate south. In the proposed condition (shown on Exhibit 32), the Project site has been designed to generally drain in the same direction as the existing conditions; the Project site would generally be graded to drain toward the east.

> As shown on the proposed condition hydrology map (Exhibit 32), the Project site is divided in to four DMAs, three of which occur onsite (DMA A through C) and one occurs off-site (DMA D). Stormwater from the proposed southern half of the roof (DMA B-2 and 3), truck dock and aisle (DMA A-2), southern drive aisle (DMA A-1), and southeast parking area (DMA A-3) would be intercepted by storm drain lines that connect to storm drain Line A located south of the building and then directed into the bioretention basin (DMA A-4). Stormwater from the northern drive aisle and parking area (DMA B-1), northern landscaped area, and northern half of the roof (DMA B-2 and 3) would be intercepted by storm drain Line B located north of the building and then directed to the bioretention basin. Stormwater from the eastern drive aisle and parking lot (DMA C-1) would be intercepted by an area drain that connects to storm drain Line C located east of the building and then directed to the bioretention basin. The basin outlet is located 6 inches above the basin bottom. Excess volume beyond the design capture volume would be detained and released at a controlled rate. The outlet size would be restricted to mitigate the peak storm and restrict post-development flow from exceeding pre-Project flow. The overflow from the basin would be collected by a 12inch rise and flow to a proposed 6-inch storm drain Line D that would drain to the proposed 24-inch public storm drain beneath Patterson Avenue, which would be constructed as part of the Project.

> Under developed conditions, the Project site would continue to accept run-on from offsite areas including the adjacent portion of I-215, Wade Avenue, Washington Street, and the property immediately south of the Project site. The flows from the off-site areas would be captured by the Project's storm drain beneath Washington Street, bypassing the bioretention basin, and conveyed to the proposed public storm drain in Patterson Avenue.

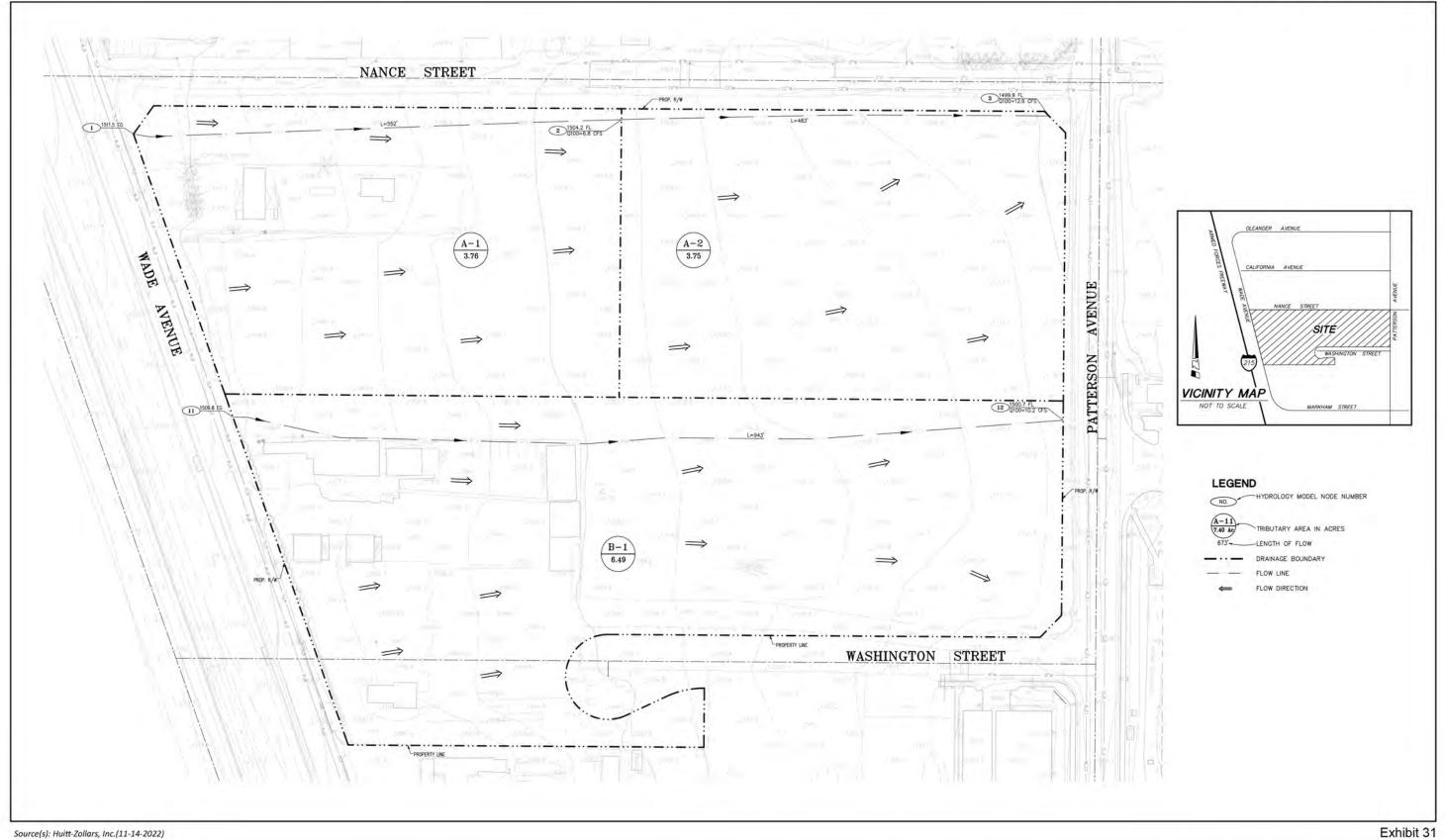
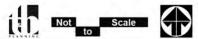


Exhibit 31







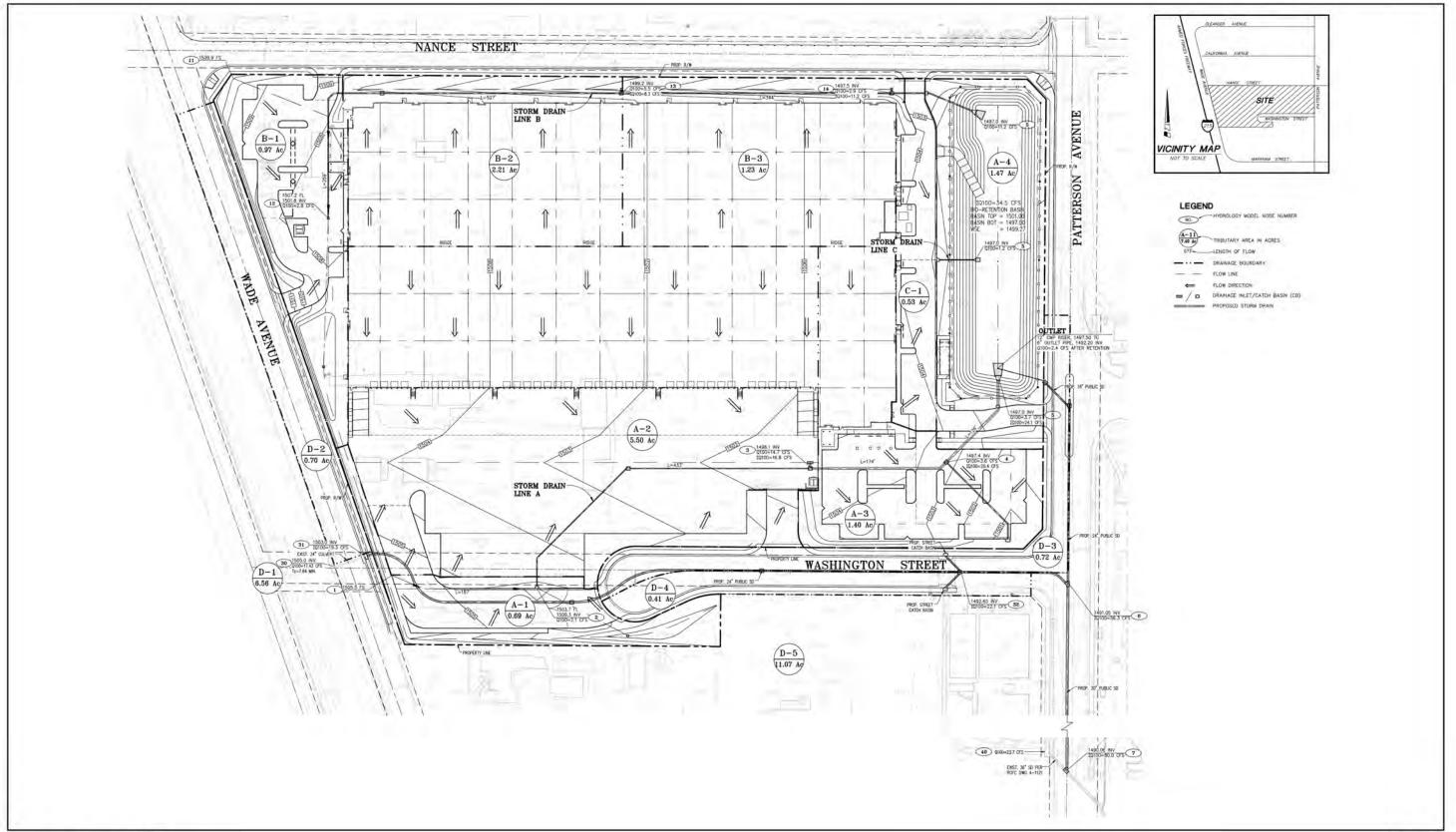


Exhibit 32 Source(s): Huitt-Zollars, Inc. (11-14-2022)







As identified in the Hydrology Report included in Appendix K of this Initial Study, the existing condition 100-year peak 24-hour flow rate that surface drains to the east is approximately 3.0 cubic feet per second (cfs). The proposed condition 100-year peak 24-hour flow rate is approximately 2.4 cfs; the Project would result in a 0.6 cfs decrease. All proposed Project site drainage and storm drain facilities would be adequately sized for a 100-year storm event. The bioretention basin was sized to capture and treat 39,516 cubic feet, which is 17,278 cubic feet more than the required design capture volume of 22,238 cubic feet. The highest water surface elevation in the basin occurs during the 24-hour storm and is 1,499.27 feet above mean sea level, which is 1.73 feet lower than the top of the basin and drains within 24 hours in all cases.

The Hydrology Report also analyzed the Project's impacts on existing Lateral B-5.2. The Hydrology Report concluded that existing Lateral B-5.2 has capacity to accept additional unmitigated runoff from the north half of the site. Thus, the Project would not cause flooding or otherwise negatively affect downstream storm drain facilities.

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

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

Under existing conditions, runoff sheet flows across the Project site in a west to east direction to Patterson Avenue. As described above, the onsite storm drain system, existing and proposed storm drains in Patterson Avenue, are sized and designed to adequately accommodate stormwater runoff from the Project site and adjacent property to the west. This impact is less than significant and no mitigation is required.

- **10c(iv). No Impact.** According to the FEMA Flood Insurance Rate Map (FIRM) No. 06065C1410G, the Project site is not located within a 100-year flood hazard area (FEMA, 2008). Accordingly, the Project would have no potential to impede or redirect flood flows within a 100-year floodplain. No impact would occur.
- **No Impact.** A tsunami is a very large ocean wave caused by an underwater earthquake or volcanic eruption. The Pacific Ocean is located approximately 37 miles southwest of the Project site; consequently, there is no potential for the Project site to be inundated by a tsunami. A seiche occurs when a wave oscillates in lakes, bays, or gulfs as a result of seismic disturbances. The nearest large body of surface water is approximately 3.3 miles east of the Project site (Lake Perris). As shown on Exhibit S-4, Dam Inundation Map, of the City's General Plan Safety Element, the Project site is not identified within the dam inundation area for Lake Perris (Perris, 2022c). Therefore, dam inundation impact associated with the construction and operation of the Project is negligible. Additionally, the Project also is located outside of the 100-year floodplain.

Accordingly, implementation of the Project would not risk release of pollutants due to inundation. No impact would occur.

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

Under the Sustainable Groundwater Management Act (SGMA) passed in 2014 (California Water Code Section 10729[d]), each high and medium priority basin, as identified by the California Department of Water Resources (DWR), is required to have a Groundwater Sustainability Agency (GSA) that will be responsible for groundwater management and development of a Groundwater Sustainability Plan (GSP). The San Jacinto Groundwater Basin is a high priority basin (DWR, 2022). The EMWD Board of Directors is the GSA for the SJGB and is responsible for development and implementation of a GSP. The GSP was submitted to DWR in November 2021, and it is currently under review. The purpose of the GSP is to define the conditions under which the groundwater resources of the West San Jacinto GSA Plan Area, which support agricultural, domestic, municipal and industrial, and environmental uses, will be managed sustainably in the future. The adoption of the GSP represents the commitment of the West San Jacinto GSA to maintain long-term, sustainable use of groundwater resources within the West San Jacinto GSA Plan Area, as required by SGMA. Over the next 20-years, data will continue to be gathered, analyzed, and used to refine the estimated sustainable yield and understanding of the sources of and influences on degraded water quality. As the understanding of the West San Jacinto GSA Plan Area improves, the findings of the GSP will be evaluated and updated as necessary. The GSP documents a viable approach, determined by the GSA in collaboration with stakeholders and informed by the best available information, to maintaining the long-term sustainability of the groundwater resources within the West San Jacinto GSA Plan Area. (EMWD, 2021a)

As discussed under Threshold 10b, the Project would not deplete groundwater supplies or interfere with groundwater recharge. Further, the EMWD anticipates that it will have enough supplies to meet demands under all water year conditions from 2020 through 2045 (EMWD, 2021b). Therefore, the Project would not conflict with or obstruct implementation of a sustainable groundwater management plan and no impact would occur.

11. LAND USE AND PLANNING

10/-	weld the Decises	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Physically divide an established community?				
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

- 11a. No Impact. As shown in the aerial photograph provided on Exhibit 2 and further discussed in Section 2 of this Initial Study, the southwestern portion of the Project site is developed with various structures that most recently support an industrial use. The remaining portions of the Project site are undeveloped, disturbed, and recently used for trailer storage. Land uses adjacent to the Project site include two non-conforming single-family residences and industrial uses to the north, vacant, disturbed land and industrial warehouse to the east, commercial/industrial and residential structures to the south, and Wade Avenue and I-215 to the west. The Project involves the development of an industrial use at the Project site, consistent with development anticipated by the PVCCSP. Additionally, adjacent sites are also designated for development with industrial uses in the PVCCSP. Rather than dividing a community, the PVCCSP intends to bring the area together as a unified neighborhood for higher quality business development including industrial, commercial, and office uses. The Project site is not part of an established community, and implementation of the Project would not physically divide an established community. No impact would occur.
- **11b. Less Than Significant Impact**. The Project site is within the PVCCSP planning area in the City of Perris.

Local Planning Programs

All activities undertaken by a planning agency must be consistent with the goals and policies of the agency's general plan. The City of Perris General Plan Land Use Element, as approved in August 2016, plays a central planning role in correlating all City land use issues, goals, and objectives into one set of development policies (Perris, 2016a). The Land Use Element includes a Land Use Map, which was revised with approval of the PVCCSP (refer to Section 1.4 of the PVCCSP) and an associated set of land use designations, goals, policies, and guidelines. The Project site is located within Planning Area 1: North Industrial Area, which, is generally made up of "industrial" land use designations and uses. While there are some residential

structures in this area, the majority of land uses are non-residential (Perris, 2016a). As previously discussed in Section 2 of this Initial Study, the existing General Plan land use designation and zoning for the Project site is Specific Plan. The Project site is within the PVCCSP planning area and is designated Light Industrial. As identified in the PVCCSP, the Light Industrial designation provides for light industrial uses and related activities including manufacturing, research, warehouse and distribution, assembly of non-hazardous materials and retail related to manufacturing. This zone correlates with the "Light Industrial" General Plan land use designation. The Project involves the construction and operation of an approximately 263,820-square-foot industrial building and is consistent with the existing General Plan land use and zoning designations and does not conflict with the General Plan policies. No General Plan Amendment, Zone Change, or Specific Plan amendment is required by the Project. The Project would also comply with the applicable standards and regulations in the PVCCSP and the Perris Zoning Code, as identified in this Initial Study. The PVCCSP EIR concludes that implementation of the PCVVSP, of which the Project is a part, would not result in inconsistencies with the General Plan policies. Table 3-13 below addresses the Project's consistency with policies applicable to Light Industrial uses. as outlined in the City's General Plan, that have been adopted for the purpose of avoiding or mitigating an environmental effect.

Table 4.8-B of the PVCCSP EIR addresses the PVCCSP's consistency with the goals, policies, and measures of the City's General Plan that were in effect at the time that the PVCCSP was adopted. The PVCCSP EIR concludes that implementation of the PVCCSP would not result in inconsistencies with the General Plan goals and policies. However, the PVCCSP EIR was not able to evaluate the consistency of each potential development project within the PVCCSP planning area. Therefore, Table 3-13 below addresses the Project's consistency with the current General Plan policies that have been adopted for the purpose of avoiding or mitigating an environmental effect. The Project's consistency with MARB/IPA planning programs, including the Airport Land Use Compatibility Plan, is discussed in the Hazards and Hazardous Materials and Noise sections of this Initial Study, and the consistency analysis for policies addressing the circulation system is provided in the Transportation section.

TABLE 3-13 CONSISTENCY WITH CITY OF PERRIS GENERAL PLAN POLICIES

GENERAL PLAN POLICY CONSISTENCY ANALYSIS Conservation Element Policy II.A. Comply with state and federal regulations to ensure Consistent. As identified in Biological Resources protection and preservation of significant biological resources. section of this Initial Study and in the Biological Resources Report presented in Appendix C. Policy III.A. Review all public and private development and required biological surveys were conducted for the construction projects and any other land use plans or activities Project to determine the presence or absence of within the MSHCP area, in accordance with the conservation protected biological resources or protected habitat criteria procedures and mitigation requirements set forth in the areas. According to the Biological Resources MSHCP. Project site Report, the consists developed/disturbed and ornamental vegetation types. There are no sensitive plant or animal species or vegetation communities located onsite or within the offsite improvement areas. However, the Project site has the potential to support burrowing owl and migratory birds/foraging raptors. No burrowing owls or sign of burrowing owls were present during the field survey. However, implementation of the Project has the potential to impact burrowing owl, if present during construction, and migratory birds if construction

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
	occurs during the peak bird nesting season. The Project incorporates updated mitigation measures from the PVCCSP EIR (including Project-level mitigation measures MM 4-1 and MM 4-2) that would ensure that any potential impacts to burrowing owl and migratory birds would be reduced to a less than significant level. Impacts to biological resources would be less than significant.
Policy III.A. Review all public and private development and construction projects and any other land use plans or activities within the MSHCP area, in accordance with the conservation criteria procedures and mitigation requirements set forth in the MSHCP.	Consistent. As stated in the Biological Resources section of this Initial Study, the Project area is not located within an MSHCP cell criteria area, proposed MSHCP conservation area, or MSHCP cores and linkages. However, the Project site is partially within a predetermined MSHCP Survey Area for the burrowing owl survey area. In compliance with the requirements of the MSHCP, a habitat assessment was conducted for the burrowing owl. There are no jurisdictional areas within or adjacent to the Project site. The biological resources technical report is provided in Appendix C of this Initial Study. The Project's consistency with the MSHCP was also reviewed in the Biological Resources section of this Initial Study (Threshold 4f) and it was determined that, with implementation of the required PVCCSP EIR mitigation measures, the Project would be consistent with and implement the MSHCP.
Policy IV.A. Comply with state and federal regulations and ensure preservation of the significant historical, archaeological and paleontological resources.	Consistent. In compliance with mitigation measure MM Cult 1 of the PVCCSP EIR, a Phase I Cultural Resources Study and a Paleontological Resources Assessment were prepared for the Project to address potential impacts to historic, archaeological, and paleontological resources. No significant historic, archaeological, or paleontological resources were identified within the Project site or offsite improvement areas, and no resources were identified based on the records searches conducted. Additionally, Project-level mitigation measures MM 5-1, MM 5-2, and MM 7-1 of this Initial Study identify the requirements for monitoring and actions to be taken in the event resources are discovered during construction. These measures have been incorporated into the Project to ensure that any significant historic, archaeological, and/or paleontological sites encountered during construction are protected in accordance with local, State, and federal regulations.
Policy V.A. Coordinate land-planning efforts with local water purveyors.	Consistent. The Project is being developed within the PVCCSP area and is consistent with the PVCCSP land use and growth assumptions assumed in the WSA prepared for the PVCCSP. The EMWD determined that it will be able to provide adequate water supply to meet the potable water demand for future development allowed by the PVCCSP as part of its existing and future demands. Therefore, there are sufficient water supplies available to serve the Project from EMWD's existing entitlements and resources. This is consistent with the land use assumptions of the PVCCSP for industrial uses.

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
Policy VI.A. Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).	Consistent. As discussed in the Hydrology and Water Quality section of this Initial Study, development of the Project site would involve grading of more than one acre. Therefore, the Project Applicant would be required to obtain a NPDES General Construction permit and comply with permit requirements effective at the time of construction. A Preliminary WQMP has been prepared for the Project that includes BMPs to manage post-development water quality in order to protect regional water quality. In addition, the Project Applicant shall submit an SWPPP to and receive approval from the City of Perris. The SWPPP shall include a surface water control plan and erosion-control plan citing specific measures to control onsite and offsite erosion during the entire grading and construction period. Groundwater is estimated to be more than 30 feet below ground surface. Therefore Project
	below ground surface. Therefore, Project construction and operation would not impact groundwater.
Policy VIII.A. Adopt and maintain development regulations that encourage water and resource conservation.	Consistent. As identified in Section 2.0, Project Description, and further discussed in the Greenhouse Gas Emissions and Utilities and Services Systems sections of this Initial Study, the PVCCSP and PVCCSP EIR includes requirements related to water and resource conservation. These requirements have been incorporated into the Project. Notably, as with all new development in the City of Perris and in the EMWD service area, the Project would install water efficient devices and landscaping.
Policy VIII.B. Adopt and maintain development regulations that encourage recycling and reduced waste generation by construction projects.	Consistent. As discussed in the Utilities and Service Systems, the Project would comply with the requirements of the CALGreen Code to divert at least 65 percent of construction waste from landfills. This exceeds the 50 percent diversion requirement established in Chapter 7.44, Construction and Demolition Waste Management, of the City's Municipal Code.
Land Use Element	
Policy II.A Require new development to pay its full, fair-share of infrastructure costs.	Consistent. The PVCCSP includes an Infrastructure Plan that identifies the utility infrastructure necessary to serve the allowed development in the PVCCSP planning area. Each individual development, including the Project, is required to implement the infrastructure needed to serve its proposed uses. Water, wastewater, drainage, and dry utility lines that would be installed as part of the Project are described in Section 2.2.4 of this Initial Study, including installation of a public storm drain line beneath Patterson Avenue.
Policy III.A Accommodate diversity in the local economy.	Consistent. As identified in the Population and Housing section of this Initial Study, the Project would generate construction jobs and, during operation, would generate approximately 256 new jobs. It is anticipated that there would be employment opportunities generated for residents.

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
Policy V.A. Restrict development in areas at risk of damage due to disasters.	Consistent. As discussed in the Hydrology and Water Quality section of the Initial Study, the Project site is not located within the 100-year floodplain or within a dam inundation area.
	As identified in the Geology and Soils section of this Initial Study, the Project site is not within an Alquist-Priolo Earthquake Fault Zone. Further, compliance with requirements of the PVCCSP and PVCCSP EIR, the City's General Plan measures, and recommendations from the Project-specific geotechnical report would ensure that potential impacts related to geology and soils are less than significant.
Noise Element	
Policy I.A. The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development.	Consistent. As discussed in the Noise section of this Initial Study, the existing and future noise environment for the Project site is dominated by transportation-related noise associated with the arterial roadway network, and additional background noise includes aircraft overflight noise from MARB/IPA. Industrial uses are considered normally acceptable with exterior noise levels of up to 70 dBA CNEL and conditionally acceptable with exterior noise levels between 70 and 80 dBA CNEL. Estimated traffic noise levels along Nance Street, Patterson Avenue, and Wade Avenue and I-215 would not exceed 80 dBA CNEL. As such, the exposure of persons working within the Project site would remain below the established guidelines for industrial uses.
Policy II.A. Appropriate measures shall be taken in the design phase of future roadway widening projects to minimize impacts on existing sensitive noise receptors.	Consistent. As part of the Project, Nance Street, Patterson Avenue, Washington Street, and Wade Avenue would be improved in accordance with the standards identified in the PVCCSP. As discussed in the Noise section of this Initial Study, the City of Perris Municipal Code limits the hours for construction to between 7:00 AM and 7:00 PM and prohibits construction on Sundays and most legal holidays. Further, PVCCSP EIR construction-related noise mitigation measure would be implemented to minimize noise impacts during construction (refer to PVCCSP EIR mitigation measures MM Noise 1 through MM Noise 4). No significant noise impacts would result during construction of proposed roadway improvements.
Policy IV.A. Reduce or avoid the existing and potential future impacts from air traffic on new sensitive noise land uses in areas where air traffic noise is 60 dBA CNEL or higher.	Consistent. The Hazards and Hazardous Materials and Noise sections of this Initial Study address noise exposure from MARB/IPA operations. As identified, Compatibility Zone C1 is considered to have a moderate noise impact. The Project site is located outside the 65 dBA CNEL noise level contour boundaries and would not expose new sensitive noise land uses to the Project site.
Policy V.A. New large-scale commercial or industrial facilities located within 160 feet of sensitive land uses shall mitigate noise impacts to attain an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria.	Consistent. The nearest sensitive use to the Project site includes two non-conforming residential structures approximately 44 feet to the north across Nance Street. As discussed in the Noise section of this Initial Study, the Project's operational noise levels at the nearby sensitive

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
	receiver locations would range from 47.7 and 57.0 dBA CNEL. Based on the results of this analysis, the Project operational noise levels would not generate noise levels in excess of the City of Perris 60 dBA CNEL exterior noise level standard at the nearest sensitive receiver locations.
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.	Consistent. As described in Section 2.0, Project Description, the Project includes site-adjacent roadway improvements to Nance Street, Patterson Avenue, Wade Avenue, and Washington Street. The roadways would be designed and constructed in compliance with the City's standards and would facilitate emergency vehicle access in the area.
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.	Consistent. As described in Section 2.2.4 of this Initial Study, the Project would include the installation of the utility infrastructure necessary to serve the Project. This would include the backbone infrastructure along Nance Street (recycled water), Washington Street (water and storm drain) and Patterson Avenue (recycled water, sewer, storm drain).
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.	Consistent. As shown on Exhibit 8, the Project includes six proposed driveways, which are designed to provide adequate access to the site for truck, automobiles, and emergency vehicles. Exhibit 10 depicts the proposed fire access plan. The Project would not result in inadequate ingress/egress.
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. Policy S-4.4. Require flood mitigation plans for all proposed projects in the 100-year floodplain (Flood Zone A and Flood Zone AE).	Consistent. As discussed in the Hydrology and Water Quality section of the Initial Study, the Project site is not located within the 100-year floodplain. The Project would not be required to prepare a flood mitigation plan.
Policy S-4.3. Require new development projects and major remodels to control stormwater run-off on site.	Consistent. As described in Section 2.0, Project Description, of this Initial Study, and further discussed in the Hydrology and Water Quality section of this Initial Study, the Project's onsite storm drain system has been designed such that onsite flows generated by the Project would be collected via inlets and would be conveyed via storm drains to the onsite bioretention basin, which would attenuate peak storm flows to ensure that developed conditions do not exceed the existing condition peak runoff rate. Further, the onsite storm drain system includes infrastructure to accommodate stormwater run-on from the property west of the Project site, including the public storm drain lines discussed previously.
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.	Consistent. As discussed in the Wildfire section of this Initial Study, the Project site is located outside a VHFHSZ. The Project would not require the transfer of development right to lower risk areas.
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.	Consistent. The Project would construct roadway improvements necessary to serve the proposed use and would improve emergency access to the Project site and surrounding areas. Access to the Project site would be provided from each of the four

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
GENERAL FLAN FOLIOT	roadways surrounding the Project site. Roadway
	improvements and access would be constructed in accordance with City standards.
Policy S-5.10. Ensure that existing and new developments have adequate water supplies and conveyance capacity to meet daily demands and firefighting requirements.	Consistent. The Project includes the installation of water infrastructure to serve the Project, which would be sized during final design to meet the water demands/requirements for firefighting. As discussed in the Utilities and Service Systems section of this Initial Study, the EMWD has sufficient water supplies to serve the Project.
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.	Consistent. The Project site is located within the MARB/IPA Influence Area Zone C-1 (Primary Approach/Departure Zone); however, the Project site is not located within the Accident Potential Zone. The Hazards and Hazardous Materials and
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.	Noise sections of this Initial Study address the Project's consistency with the MARB/IPA ALUCP and AICUZ study. As identified, the Project
Policy S.6-3. Effectively coordinate with March Air Reserve Base and Perris Valley Airport on development within its influence areas.	incorporates and would comply with PVCCSP EIR mitigation measures MM Haz 3 through MM Haz 5 and impacts associated with airport operations would be less than significant. Refer to the consistency analysis for Policy IV.A of the Noise Element, which addresses aircraft noise.
Policy S-7.1. Require all development to provide adequate protection from damage associated with seismic incidents.	Consistent. As discussed in the Geology and Soils section of this Initial Study, the PVCCSP EIR, and the California Building Code (CBC), as adopted by
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.	the City, provide guidelines and parameters that reduce the effects of ground shaking produced by regional seismic events, and the Project proponent would be required to implement seismic design considerations in accordance with the current CBC. Further, consistent with Safety Element implementation measures and PVCCSP EIR mitigation measure MM Geo 1 from the PVCCSP EIR, a Project-specific geotechnical investigation has been prepared, and the Project would be designed and constructed in accordance with all final Geotechnical Report recommendations
Policy S-8.2. Ensure that the transport, use, storage, and disposal of hazardous materials occur in a responsible manner that protects public health and safety.	Consistent. As discussed in the Hazards and Hazardous Materials of this Initial Study, the Project would not involve manufacturing and other chemical processing and are not allowed with the proposed warehouse uses. The Project would be required to comply with applicable regulations addressing the use, storage, and disposal of hazardous materials.
Healthy Community Element	
Policy HC 1.3. Improve safety and the perception of safety by requiring adequate lighting, street visibility, and defensible space.	Consistent. As described in Aesthetics section of this Initial Study, development of the Project with the proposed industrial warehouse and manufacturing building would introduce new permanent sources of light into the area in the form of signage, building lighting, and parking lot lighting for nighttime operations, security, and safety.
Policy HC 2.3. Promote increased physical activity, reduced driving and increased walking, cycling and public transit by: Requiring where appropriate the development of compact development patterns that are pedestrian and bicycle friendly	Consistent. As previously discussed, the Project would include roadway and sidewalk improvements, and would provide facilities to encourage bicycle travel.

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
Increasing opportunities for active transportation (walking and biking) and transit use. Increasing opportunities for active transportation (walking and biking) and transit use.	With respect to transit use, the City is currently served by the Riverside Transit Authority (RTA), a public transit agency serving the unincorporated Riverside County region. There are currently no existing bus routes that in proximity to the Project
Encouraging the development of neighborhood grocery stores that provide fresh produce.	site and no bus routes are proposed. There are currently no existing bus routes along the roadways adjacent to the site; the nearest existing routes are Route 19 along Perris Boulevard, approximately 1.7. miles southeast and Route 41 along Ramona Expressway, approximately 0.7 mile south of the Project site.
Policy HC 2.4. Promote development patterns and policies that: • Reduce commute times	Consistent. As further discussed in the Transportation section of this Initial Study, the Project would generate less than 500 average daily trips (ADT) and would result in less than significant
 Encourage the improvement of vacant properties and the reinvestment in neighborhoods Provide public space for people to congregate and interact 	impacts related to vehicle miles traveled (VMT). The Project Applicant would develop the Project site with an industrial use consistent with the design
socially • Foster safe and attractive environments	guidelines and development standards outlined in the PVCCSP. The Project includes employee amenities, which would provide space for future employees to interact.
Policy HC 2.6 Encourage land use and urban design to promote physical activity, provide access to nutritious foods, and reduce air pollution	Consistent. Refer to the consistency analysis for Policy HC 2.2, Policy HC 2.3, and Policy HC 2.4, above, which address the Project's consistency with policies that promote physical activities. Additionally, as discussed in the Air Quality section of this Initial Study, the Project would have less than significant air quality impacts and would incorporate PVCCSP EIR mitigation measures which serve to reduce air pollutant emissions.
Policy HC 3.1. Coordinate with transportation service providers and transportation planning entities to improve access to multimodal transportation options throughout Perris including public transit	Consistent. Roadway improvements included as part of the Project would be constructed according to the standards of the City of Perris and would include sidewalks, as required by the PVCCSP. Onsite accommodations for bicyclists, such as bicycle parking, would also be provided onsite, as required, and would encourage this alternative mode of transportation.
Policy HC 3.5. Promote job growth within Perris to reduce the substantial out-of-Perris job commutes that exist today	Consistent. As identified in the Population and Housing section of this Initial Study, the Project would generate construction jobs and, during operation, potentially generate 256 new employment opportunities in the City. It is anticipated that there would be employment opportunities generated for local residents.
Policy HC 6.1. Support regional efforts to improve air quality through energy efficient technology, use of alternative fuels, and land use and transportation planning	Consistent. As previously identified, an objective of the PVCCSP is to promote sustainable development. Refer to the consistency analysis for Goal V of the Circulation Element, which addresses new technology.
Policy HC 6.2. Support regional water quality efforts that balance water conservation, use of recycled water, and best practices in watershed management	Consistent. Refer to the consistency analysis for Policy VIII.A of the Conservation Element, above, which addresses water and resource conservation. Further, as discussed in the Hydrology and Water Quality of this Initial Study, the Project would be implemented in compliance with applicable regulations for the protection of water quality during construction and operation.

GENERAL PLAN POLICY

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

CONSISTENCY ANALYSIS

Consistent. As further discussed in the Air Quality section of this Initial Study, the Project would be implemented in compliance with applicable SCAQMD rules in place to protect air quality in the region during construction activities. Additionally, the Project incorporates mitigation measures from the PVCCSP EIR to reduce Project-related construction emissions. The Project's construction-related air pollutant emissions would be less than significant on a regional and local level.

Environmental Justice

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.

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."

Consistent. The Project includes the development of an industrial warehouse use on an approximately 16.1-gross-acre site. The land uses surrounding the Project site include industrial uses to the north (across Nance Street) and to the south (across Washington Street); I-215 to the west on the opposite side of Wade Avenue, and vacant disturbed land and an industrial warehouse to the east (across Patterson Avenue). It should be noted that two non-conforming single-family residences are located north of the Project site. As shown on the conceptual site provided on Exhibit 3 in Section 2.0, Project Description, the proposed industrial use has been designed so that the enclosed truck court yards are on the south side of the building. As further discussed in the Noise section of this Initial Study, a solid permanent barrier would be installed around the truck court for screening and noise attenuation purposes.

As discussed in the Air Quality of this Initial Study, a health risk assessment has been prepared for construction and operation of the Project and addresses potential health risks to the maximally exposed individual receptor, maximally exposed worker, and maximally exposed school child. Potential health risks were determined to be less than significant.

Inform existing industries of the state 5-minute maximum idling limitation and condition new industrial projects to enforce the state's 5-minute maximum idling limitation for stationary diesel trucks.

Consistent. As further discusses in the Air Quality section of this Initial Study, the Project would implement PVCCSP EIR mitigation measure MM Air 11, which requires signage be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of 5 minutes.

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.

Consistent. Refer to the consistency analysis for policies HC 2.1 and HC 2.3, which addresses active transportation. Additionally, as further discussed in the Transportation section of this Initial Study, there is an existing Class II bike lane along Patterson Avenue; this bike lane would be accommodated

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
	with the proposed roadway improvements adjacent to the Project site. The Project would be consistent with the City's Active Transportation Plan. Additionally, the Project would include the provision of bicycle storage and bicycle facilities as required by the City and the CalGreen Code.

Regional Planning Programs

With respect to regional planning, SCAG is the MPO for six counties: Riverside, Los Angeles, Orange, San Bernardino, Ventura, and Imperial. As the designated MPO, the federal government mandates SCAG to research and draw up plans for transportation, growth management, hazardous waste management, and air quality. Additionally, SCAG reviews projects of regional significance for consistency with regional plans. Regionally significant industrial projects include "A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area." The Project would be located on an approximate 16.1 gross-acre site and includes a 263,820-square-foot industrial building, with approximately 256 employees¹⁹. Thus, the Project is not regionally significant, and assessment of the Project's consistency with regional planning plans/programs is not required. No impacts would occur, and no mitigation is required.

As identified through this consistency analysis, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

12. MINERAL RESOURCES

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	ould 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?				\boxtimes
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?				\boxtimes

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

This employment estimate is based on the PVCCSP EIR employment factor of 1 employee per 1,030 square feet of Light Industrial floor space.

EXPLANATION OF CHECKLIST ANSWERS

No Impact. Figure OS-6 of the Riverside County General Plan and the California Department of Conservation's (DOC) Mineral Land Classification for the area shows that the Project site is located within Mineral Resource Zone 3 (MRZ-3). MRZ-3 indicates areas where the available geologic information indicates that mineral deposits exist or are likely to exist; however, the significance of the deposit cannot be evaluated from available data (Riverside County, 2015). In addition, the California Department of Conservation does not show oil, gas, or geothermal fields underlying the site; and no oil or gas wells are recorded on or near the site in the Division of Oil, Gas, and Geothermal Resources (DOGGR) Well Finder (DOC, 2022). No sites within the City of Perris City limits have been designated as locally important mineral resource recovery sites in the City of Perris General Plan or the Riverside County General Plan (Perris, 2005b). Accordingly, no impact to the availability of a regionally or locally important mineral resource would occur.

13. <u>NOISE</u>

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

Information presented in this section is based on the *Patterson Commerce Center (DPR 22-00003) Noise Impact Analysis, City of Perris* (Noise Analysis) prepared by Urban Crossroads (March 27, 2023) for the Project (Urban Crossroads, 2023f). The Noise Analysis is included in Appendix L of this Initial Study and is summarized herein.

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

source, such as the doubling of a traffic volume, would increase the noise level by 3 dBA; a halving of the energy would result in a 3 dBA decrease.

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

To assess the existing noise level environment, five 24-hour noise level measurements were taken at potential receiver locations in December 2021. The receiver locations were selected to describe and document the existing noise environment within the Project study area, including any existing noise source activities from the existing land use activities at the Project site. Exhibit 33 depicts the boundaries of the Project site and the noise level measurement locations. To fully describe the existing noise conditions, noise level measurements were collected by Urban Crossroads on Thursday, December 16, 2021. The noise measurement methods are further described in the Noise Analysis included in Appendix L of this Initial Study.

The noise measurements focus on the average or equivalent sound levels (L_{eq}). Table 3-14 provides the (energy average) noise levels used to describe the daytime (7:01 a.m. to 10:00 p.m.) and nighttime (10:01 p.m. to 7:00 a.m.) ambient conditions. These daytime and nighttime energy average noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number. The background ambient noise levels in the Project study area are dominated by the transportation-related noise associated with the roadway network (i.e., Nance Street, Patterson Avenue, Wade Avenue, and I-215). This includes the auto and heavy truck activities near the noise level measurement locations. Additional background noise sources include aircraft overflight noise from MARB/IPA. Following is a summary of the noise measurement results.

TABLE 3-14 24-HOUR AMBIENT NOISE LEVEL MEASUREMENTS

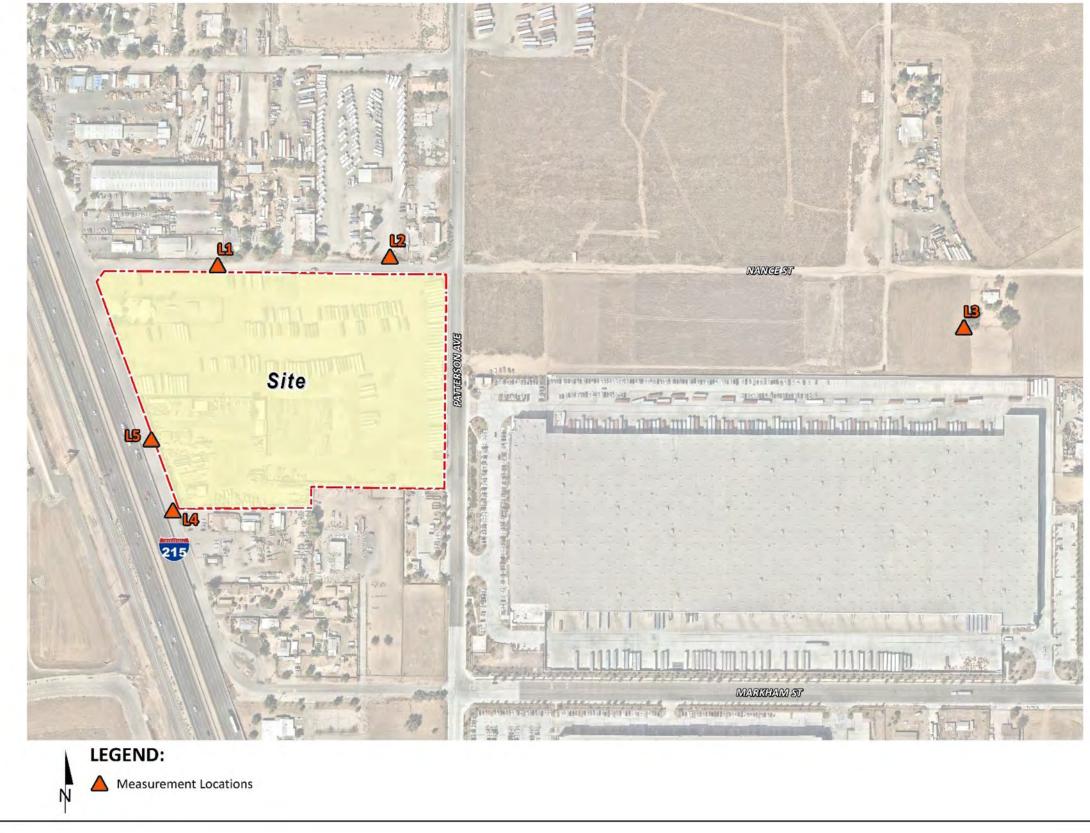
Location ¹	Description		Energy Average Noise Level (dBA L _{eq}) ²	
		Daytime	Nighttime	
L1	Located north of the Project site near single-family residence at 1307 West Nance Street.	62.1	61.8	
L2	Located north of the Project site near single-family residence at 1210 West Nance Street.	62.9	60.8	
L3	Located east of the Project site near single-family residence at 953 West Nance Street.	58.9	55.5	
L4	Located south of the Project site at the Riverbend Equipment Company at 4451 Wade Avenue.	77.4	76.6	
L5	Located west of the Project site near Wade Avenue.	78.3	77.6	

¹ See Exhibit 33 for the noise level measurement locations.

Source: (Urban Crossroads, 2023f, Table 5-1)

² Energy (logarithmic) average levels. The long-term 24-hour measurement worksheets are included in Appendix 5.2.

[&]quot;Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.



Source(s): Urban Crossroads (08-15-2022)







As identified in the PVCCSP EIR, sensitive receivers are areas where humans are participating in activities that may be subject to the stress of significant interference from noise and often include residential dwellings, mobile homes, hotels, motels, hospitals, nursing homes, educational facilities, and libraries. Other receivers include office and industrial buildings, which are not considered as sensitive as residences but are still protected by City of Perris land use compatibility standards, as discussed under Threshold 13a below. To describe the potential off-site Project noise levels, four receiver locations in the vicinity of the Project site were identified and are shown on Exhibit 34 and described below. All distances are measured in a straight line from the Project site boundary to the property line of each receiver location. The nearest sensitive noise receivers to the Project site are two non-conforming single-family residences approximately 44 feet north of the Project site as shown on Exhibit 34.

- R1: Location R1 represents the property line of the existing residence at 1307 West Nance Street, approximately 44 feet north of the Project site. A 24-hour noise measurement was taken near this location, L1, to describe the existing ambient noise environment.
- R2: Location R2 represents the property line of the existing noise sensitive residence at 1210 West Nance Street, approximately 44 feet north of the Project site. A 24-hour noise measurement was taken near this location, L2, to describe the existing ambient noise environment.
- R3: Location R3 represents the property line of the existing noise sensitive residence at 953 West Nance Street, approximately 1,599 feet east of the Project site. A 24-hour noise measurement was taken near this location, L3, to describe the existing ambient noise environment.
- R4: Location R4 represents the property line of the existing noise sensitive residence at 4439 Wade Avenue, approximately 231 feet south of the Project site. A 24-hour noise measurement was taken near this location, L4, to describe the existing ambient noise environment.

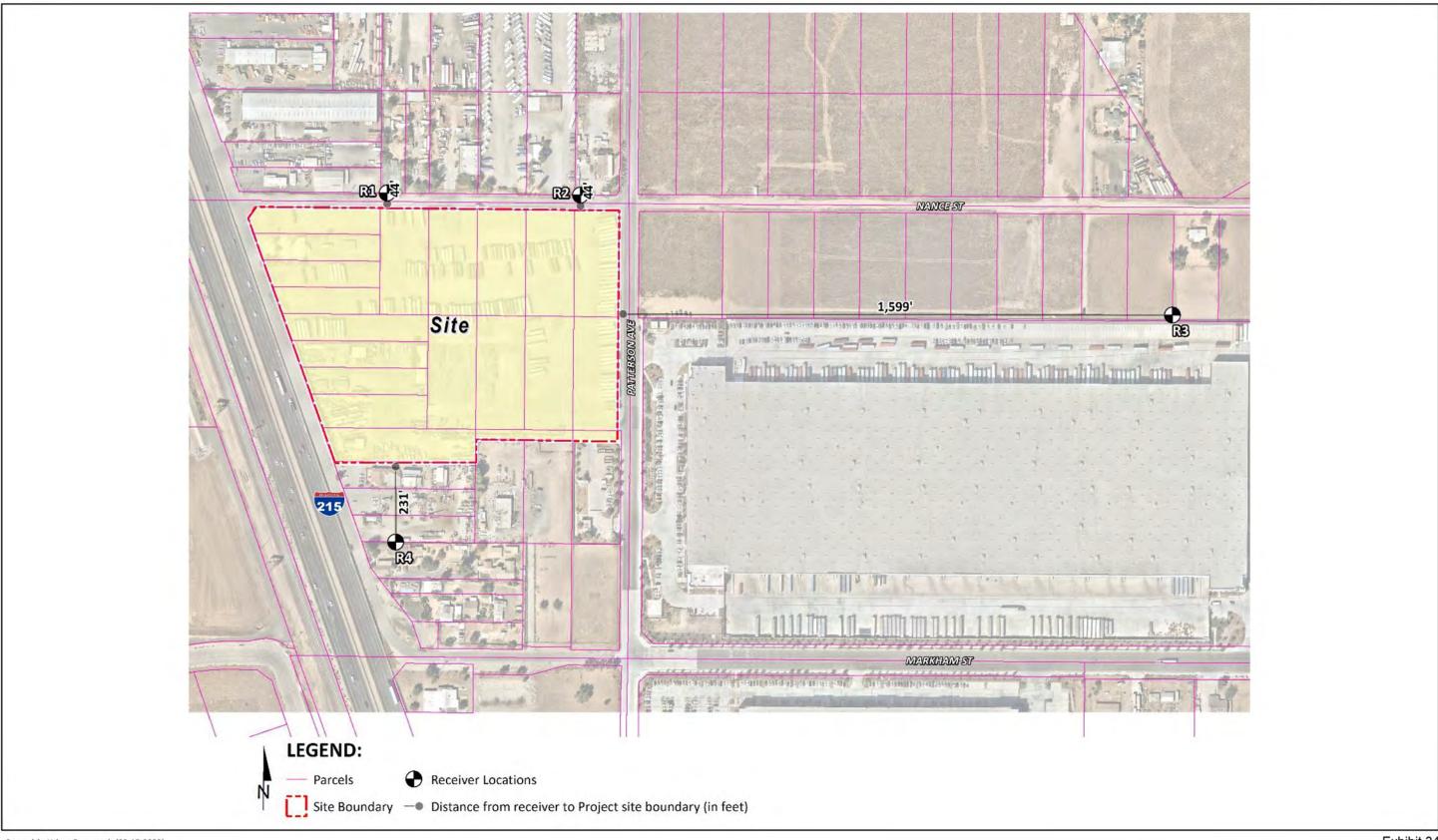
APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

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

MM Noise 1

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



Source(s): Urban Crossroads (08-15-2022)







MM Noise 2	During construction, stationary construction equipment, stockpiling and
	vehicle staging areas would be placed a minimum of 446 feet away from
	the closest sensitive receptor ²⁰ .

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.

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

EXPLANATION OF CHECKLIST ANSWERS

Noise impacts would be considered significant if any of the following occur as a direct result of the Project construction or operational activities. Table 3-15 shows the summary matrix of the significance criteria identified in the City of Perris Municipal Code, General Plan Noise Element, and PVCC EIR.

TABLE 3-15 SIGNIFICANCE CRITERIA SUMMARY

Analysis	Receiving	Candition(a)	Significance Criteria		
Analysis	Land Use	Condition(s)	Daytime	Nighttime	
	Noise- Sensitive ¹	At residential land use ¹	80 dBA L _{max}	60 dBA L _{max}	
Operational		Within 160 Feet of noise-sensitive use ²	60 dBA CNEL (exterior)		
Operational		if resulting noise level is < 60 dBA L _{eq} ³	≥ 5 dBA Leq Project increas		
		if resulting noise level is > 60 dBA L _{eq} ³	≥ 3 dBA L _{eq} Pı	oject increase	
Construction	Noise-	Noise Level Threshold ⁴	80 dBA L _{max}		
Construction	Sensitive	Vibration Level Threshold ⁵	0.5 PPV	(in/sec)	

¹ City of Perris Municipal Code, Section 7.34.040 (Appendix 3.1 of Appendix L).

MM Noise 4

Source: (Urban Crossroads, 2023f, Table 4-1)

13a. Less than Significant Impact.

Construction Noise Impact Analysis

Construction noise represents a short-term increase on the ambient noise levels. Construction-related noise impacts are expected to create temporary and intermittent high-level noise conditions at receivers surrounding the Project site when certain activities occur at the Project site boundary. It is expected that the off-site construction activities would not take place at one location for the entire duration of construction. Construction noise from this off-site work would, therefore, be relatively short term and the noise levels would be reduced as construction work moves linearly along the existing public ROW and farther from sensitive uses.

To analyze noise impacts originating from the construction of the Project, noise from construction activities is evaluated against standards established under the City's Municipal Code. The City's Municipal Code, Section 7.34.060, identifies that it "is

² City of Perris General Plan Noise Element, Implementation Measure V.A.1.

³ PVCC SP EIR, Page 4.9-20.

⁴ City of Perris Municipal Code, Section 7.34.060 (Appendix 3.1 of Appendix L).

⁵ PVCC SP EIR, Page 4.9-27.

[&]quot;Daytime" = 7:01 a.m. - 10:00 p.m.; "Nighttime" = 10:01 p.m. - 7:00 a.m.

²⁰ Based on the Perris General Plan Noise Element discussion of construction noise (page 69).

unlawful for any person between the hours of 7:00 PM of any day and 7:00 AM of the following day, or on a legal holiday, with the exception of Columbus Day and Washington's birthday, or on Sundays to erect, construct, demolish, excavate, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise. Construction activity shall not exceed 80 dBA in residential zones in the city." A significant construction noise impact would result for any construction activity that is not in compliance with these requirements.

Noise would be generated by construction equipment, including a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. The number and mix of construction equipment is expected to occur in the following stages: demolition, site preparation, grading, building construction (including utility installation), paving, and architectural coating. As described in Section 8.2 of the Noise Analysis, the construction noise analysis was prepared using reference construction equipment noise levels from the Federal Highway Administration (FHWA) published the Roadway Construction Noise Model (RCNM). The RCNM equipment database provides a comprehensive list of the noise generating characteristics for specific types of construction equipment including reference L_{max} noise levels measured at 50 feet. Noise levels generated by heavy construction equipment can range from approximately 68 dBA to more than 85 dBA L_{max} when measured at 50 feet. However, these noise levels diminish with distance from the construction site at a rate of 6 dBA per doubling of distance. For example, a noise level of 85 dBA L_{max} measured at 50 feet from the noise source to the receiver would be reduced to 79 dBA L_{max} at 100 feet from the source to the receiver and would be further reduced to 73 dBA L_{max} at 200 feet from the source to the receiver.

Using the reference RCNM L_{max} construction equipment noise levels and the CadnaA (Computer Aided Noise Abatement) noise prediction model²¹, calculations of the Project's construction noise level impacts at the nearby receiver locations were completed. Exhibit 35 shows the construction noise source locations in relation to the nearby receiver locations previously described above. As shown on Table 3-16, the highest construction levels are expected to range from 60.4 to 79.2 dBA L_{max} at the nearest receiver locations.

TABLE 3-16 CONSTRUCTION NOISE LEVEL SUMMARY

Receiver Location ¹	Land	Highest Construction Noise Levels (dBA L _{max})								
	Use	Demolition	Site Preparation	Grading	Building Construction	Paving	Arch. Coating	Highest Levels ²		
R1	Residential	79.2	76.2	79.2	79.2	79.2	79.2	79.2		
R2	Residential	78.8	75.8	78.8	78.8	78.8	78.8	78.8		
R3	Residential	60.4	57.4	60.4	60.4	60.4	60.4	60.4		
R4	Residential	69.1	66.1	69.1	69.1	69.1	69.1	69.1		

¹ Noise receiver locations are shown on Exhibit 35

² Construction noise level calculations based on distance from the construction activity area to nearby receiver locations. CadnaA construction noise model inputs are included in Appendix 8.1 of Appendix L. Source: (Urban Crossroads, 2023f, Table 8-2)

²¹ As further described in Section 7.3 of the Noise Analysis, CadnaA can analyze multiple types of noise sources using the spatially accurate Project site plan, georeferenced Nearmap aerial imagery, topography, buildings, and barriers in its calculations to predict the outdoor noise levels.

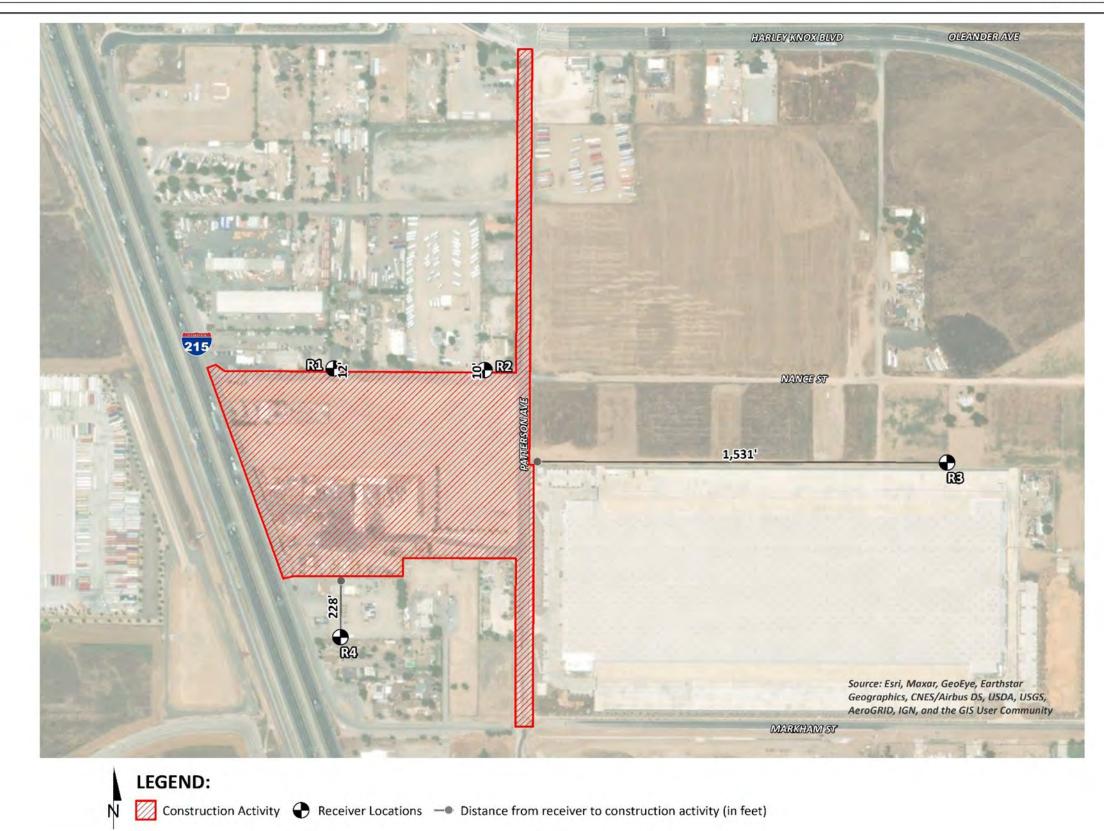


Exhibit 35 Source(s): Urban Crossroads (08-15-2022)







The Project's Noise Study evaluated Project-only construction noise, which were evaluated against exterior noise threshold established by Section 7.34.060 of the City's Municipal Code at the adjacent property line. As shown on Table 3-17, the Project's construction noise does not exceed the daytime 80 dBA $L_{\rm max}$ significance threshold at the nearest residential receiver location. It should be noted that the receiver locations are not within a residential zone and the 80 dBA $L_{\rm max}$ significance threshold does not apply; however, to provide a conservative analysis, the 80 dBA $L_{\rm max}$ threshold is applied. Additionally, the Project's construction activities would be conducted in compliance with the hours of construction identified in the City's Municipal Code, and in compliance with the requirements of the PVVCSP EIR mitigation measures identified previously (refer to PVCCSP EIR mitigation measures MM Noise 1 through MM Noise 4). As such, Project construction noise would result in less than significant impacts.

TABLE 3-17 CONSTRUCTION NOISE LEVEL COMPLIANCE

Bassiyar	Lond	Construction Noise Levels (dBA L _{max})					
Receiver Location ¹	Land Use	Highest Construction Noise Levels ²	Threshold ³	Threshold Exceeded? ⁴			
R1	Residential	79.2	80	No			
R2	Residential	78.8	80	No			
R3	Residential	60.4	80	No			
R4	Residential	69.1	80	No			

¹ Noise receiver locations are shown on Exhibit 35.

It should be noted that nighttime concrete pouring activities could occur as part of Project building construction activities. Nighttime concrete pouring activities are often used to support reduced concrete mixer truck transit times and lower air temperatures than during the daytime hours and are generally limited to the actual building area as shown on Exhibit 36. Since the nighttime concrete pours could take place outside the permitted City Municipal Code Section 7.34.060 hours of 7:00 a.m. to 7:00 p.m. on any day except Sundays and legal holidays (with the exception of Columbus Day and Washington's birthday), the Project Applicant would be required to obtain authorization for nighttime work from the City. Table 3-18 shows that concrete pour activity noise levels would range from 55.0 to 73.5 dBA L_{eq} at the parcel boundary of adjacent uses, which would not exceed the City's 80 dBA Leq significance threshold. Impacts would be less than significant.

TABLE 3-18 NIGHTTIME CONCRETE POUR NOISE LEVEL COMPLIANCE

Receiver	Land	Construction Noise Levels (dBA Lmax)					
Location ¹	Land Use	Highest Construction Noise Levels ²	Threshold ³	Threshold Exceeded? ⁴			
R1	Residential	73.5	80	No			
R2	Residential	69.6	80	No			
R3	Residential	55.0	80	No			
R4	Residential	62.5	80	No			

Noise receiver locations are shown on Exhibit 35

² Highest construction noise level calculations based on distance from the construction noise source activity to nearby receiver locations.

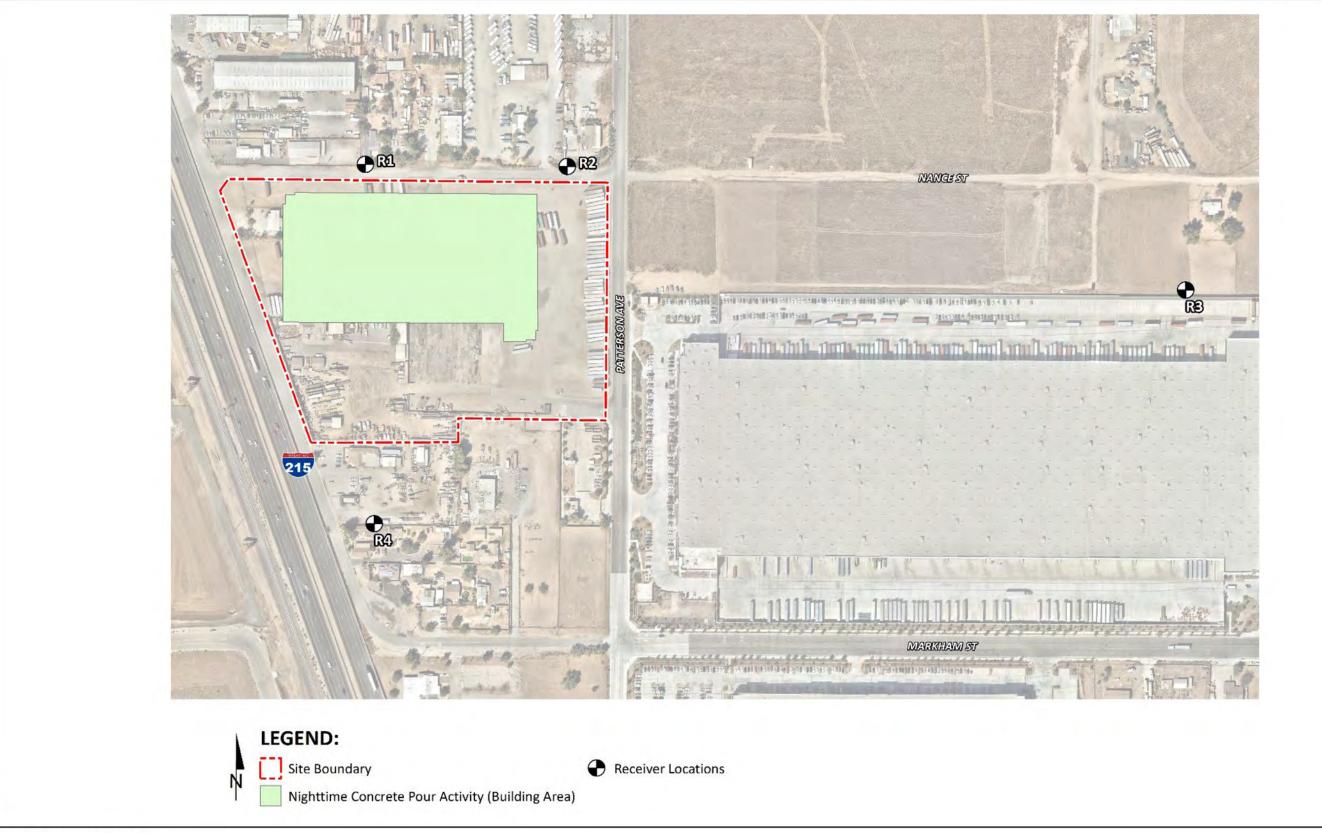
³ Construction noise level thresholds are limited to the noise sensitive receiver locations (Section 3.5 of Appendix L).

⁴ Do the estimated Project construction noise levels exceed the construction noise level threshold? Source: (Urban Crossroads, 2023f, Table 8-3)

² Nighttime concrete pour noise model calculation are included in Appendix 8.2 of Appendix L.

³ Construction noise level thresholds are limited to the noise sensitive receiver locations (Section 3.5 of Appendix L).

⁴ Do the estimated Project construction noise levels exceed the construction noise level threshold? Source: (Urban Crossroads, 2023f, Table 8-4)



Source(s): Urban Crossroads (08-15-2022)







Operational Noise from Onsite Sources

The future tenants of the Project are unknown; therefore, to present the potential worst-case noise conditions, this analysis assumes the Project would be operational 24 hours per day, seven days per week. Consistent with similar warehouse and light industrial uses, the expected business operations would primarily be conducted within the enclosed buildings, except for traffic movement, parking, as well as loading and unloading of trucks at designated loading bays. The onsite Project-related noise sources are expected to include loading dock activity, truck movements, roof-top air conditioning units, parking lot vehicle movements, and trash enclosure activity. Exhibit 37 identifies the representative receiver locations and noise source locations used to assess the operational noise levels. This analysis includes the 14-foot screenwall around the truck court and drive aisle in the southern portion of the Project site.

The operational noise analysis considers both the absolute Project only operational noise levels to demonstrate compliance with the Perris Municipal Code, Section 7.34.040 exterior noise standards, and the Project-related incremental noise level increase at the nearest noise sensitive residential receivers.

The Project's operational noise levels were estimated based on reference noise level measurements of similar operational activities as described in Section 7.2 of the Noise Analysis. The Project's operational noise levels were calculated using the reference noise levels. Tables 7-2 and 7-3 of the Noise Analysis provide the Project's operational noise levels during the daytime and nighttime hours for the respective operational activities. The daytime hourly noise levels at the offsite receiver locations are expected to range from 45.6 to 58.2 dBA L_{max}. The nighttime hourly noise levels at the off-site receiver locations are expected to range from 45.4 to 58.2 dBA L_{max}. To demonstrate compliance with local noise regulations, Table 3-19 presents the Project-only daytime and nighttime operational noise level projections against the exterior noise level thresholds established in the Perris Municipal Code. Based on the results of this analysis, the Project operational noise levels would not exceed the City's Municipal Code exterior noise level standards at the nearest receiver location during the daytime or nighttime resulting in a less than significant impact.

TABLE 3-19 OPERATIONAL NOISE LEVEL COMPLIANCE

Receiver Location ¹	Project Operational Noise Levels (dBA L _{max}) ²		Noise Level Standards (dBA L _{max}) ³		Noise Level Standards Exceeded? ⁴	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	45.6	45.4	80	60	No	No
R2	49.8	49.8	80	60	No	No
R3	48.3	48.3	80	60	No	No
R4	58.2	58.2	80	60	No	No

¹ See Exhibit 34 for the receiver locations.

Source: (Urban Crossroads, 2023f, Table 7-4)

² Proposed Project operational noise levels as shown on Tables 7-2 and 7-3 of Appendix L.

³ Exterior noise level standards per the City of Perris Municipal Code, sections 7.34.040 (Appendix 3.1 of Appendix L).

⁴ Do the estimated Project operational noise source activities exceed the noise level standards?

[&]quot;Daytime" = 7:01 a.m. to 10:00 p.m.; "Nighttime" = 10:01 p.m. to 7:00 a.m.

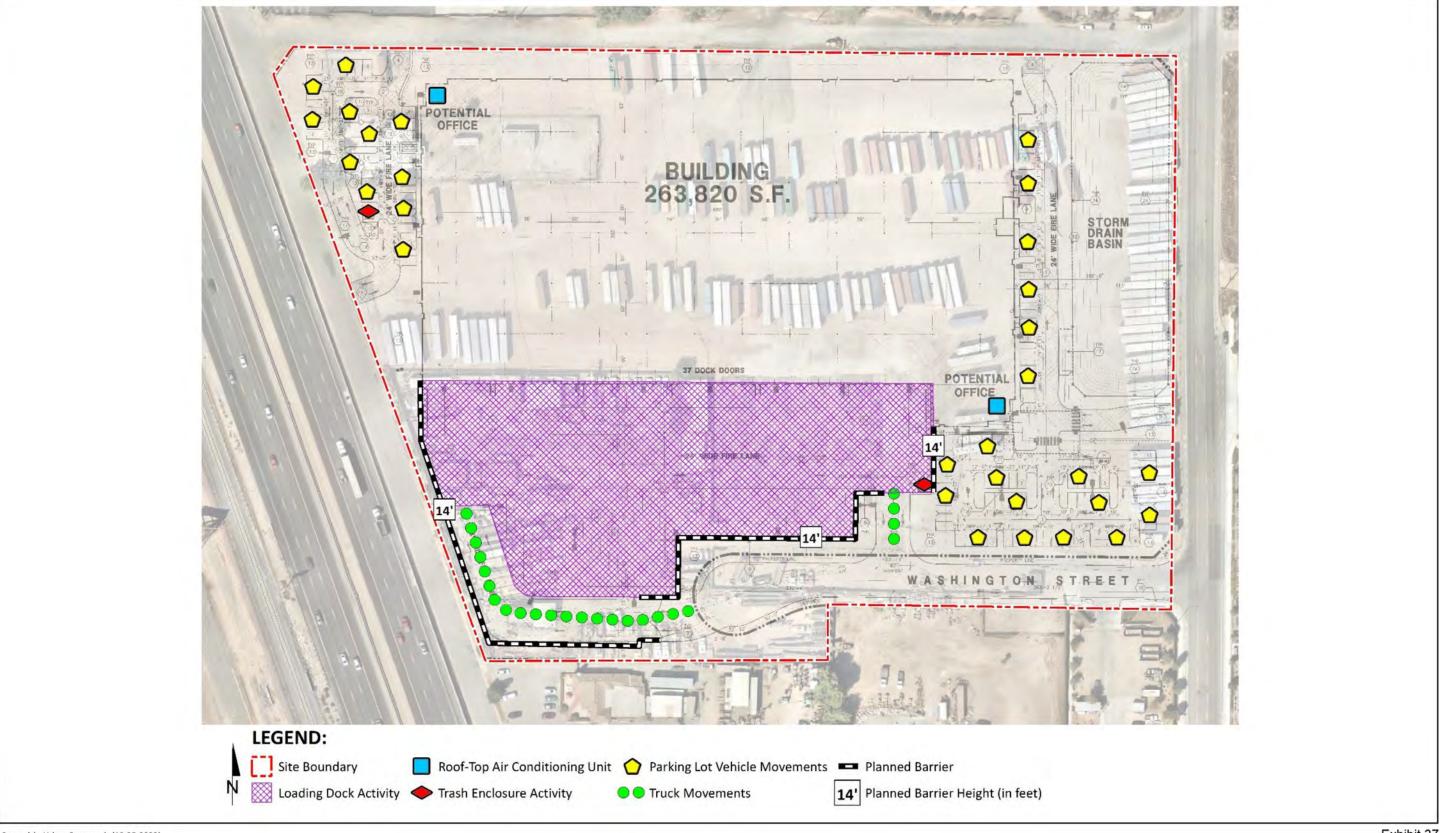


Exhibit 37 Source(s): Urban Crossroads (10-25-2022)





Consistent with the City of Perris General Plan Noise Element, Implementation Measure V.A.1, Project operational noise levels at nearest sensitive receiver locations cannot exceed 60 dBA CNEL during the nighttime. The CNEL metric is typically used to describe 24-hour transportation-related noise levels, however, the City of Perris General Plan Noise Element requires new industrial land use such as the Project to demonstrate compliance at any noise-sensitive land use within 160 feet of the Project site. Table 3-20 provides the evening and nighttime adjustments made to the operational noise levels during the applicable hours to convert the worst-case hourly operational noise levels ($L_{\rm eq}$) to 24-hour CNELs. As shown in Table 3-20 the Project's operational 24-hour noise levels at the nearby receiver locations are expected to range from 47.2 to 57.0 dBA CNEL. Based on the results of this analysis, the Project operational noise levels would not exceed the City's General Plan exterior noise level standards at the nearest receiver locations.

TABLE 3-20 OPERATAION NOISE LEVEL COMPLIANCE (CNEL)

Deseiver	Project Op	erational Nois	e Levels ²	Exterior Noise	Neigo Lovel
Receiver Location ¹	Daytime (dBA L _{eq})	Nighttime (dBA L _{eq})	24-Hour (CNEL)	Level Standards (CNEL) ³	Noise Level Standards Exceeded? ⁴
R1	41.4	41.1	47.7	60	No
R2	46.1	46.0	52.7	60	No
R3	40.6	40.6	47.2	60	No
R4	50.3	50.3	57.0	60	No

¹ See Exhibit 34 for the receiver locations.

Source: (Urban Crossroads, 2023f, Table 7-5)

Project Operational Noise Level Increases

To describe the Project operational noise level increases, the Project operational noise levels were combined with the existing ambient noise levels measurements for the nearby receiver locations potentially impacted by Project operational noise sources. The existing noise level measurements taken into consideration noise generated by uses that occupied the site when the noise measurements were taken on December 16, 2021. As further discussed in Section 2.1, until July 2022, the Project site was occupied by GRFCO, which operated various industrial uses between 1984 and 2022. The Project site is currently being leased for truck trailer storage; this use occupied the northern and eastern portion of the Project site since 2018 and began leasing the southwestern portion of the Project site in July 2022 when GRFCO vacated the property. The difference between the combined Project and ambient noise levels describes the Project noise level increases to the existing ambient noise environment. As indicated on Table 7-6 of the Noise Analysis, the Project would generate a daytime operational noise level increases ranging from 0.0 to 0.1 dBA L_{eq} at the nearest receiver locations. Table 7-7 of the Noise Analysis shows that the Project would generate a nighttime operational noise level increases ranging from 0.0 to 0.1 dBA L_{eq} at the nearest receiver locations. These noise levels include the 14-foot-high screen walls included as part of the Project.

The Project-related operational noise level increases would not exceed the operational noise level increase significance criteria presented on Table 3-15. Therefore, the incremental Project operational noise level increase is considered less than significant at all receiver locations.

² Proposed Project operational noise level calculations are included in Appendix 7.2 of Appendix L.

³ City of Perris General Plan Noise Element Implementation Measure V.A.1

⁴ Do the estimated Project operational noise source activities exceed the noise level standards?

[&]quot;Daytime" = 7:01 a.m. to 10:00 p.m.; "Nighttime" = 10:01 p.m. to 7:00 a.m.

Traffic Noise Impacts

Traffic generated by the operation of the Project would influence the traffic noise levels in surrounding off-site areas and at the Project site. According to the March 24, 2023 Patterson Commerce Center Traffic Analysis Scoping Agreement (Scoping Agreement) prepared by Urban Crossroads, in December 2021 when the environmental analysis for the Project commenced, the Project site was occupied by uses that generated an average of 140 two-way trips per day. Since the Project is anticipated to generate 632 two-way trips, the resulting comparison between the trip generation from operations occurring in December 2021 and the proposed use results The off-site Project-related traffic represents an in 492 net new Project trips. incremental increase to the existing roadway volumes, which is expected to generate a barely perceptible noise level increase of 3 dBA CNEL at nearby sensitive land uses adjacent to study area roadways, since a doubling of the existing traffic volumes would be required to generate a 3 dBA CNEL increase. For example, the Existing 2019 average daily traffic volumes on Harley Knox Boulevard north of the Project site currently exceed 20,000 vehicles per day. The incremental Project-related off-site traffic noise levels due to the 492 net additional Project trips are estimated at less than 1 dBA CNEL. Due to the low traffic volumes generated by the Project, the off-site traffic noise levels generated by the Project are considered less than significant.

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

13b. Less Than Significant Impact. Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Construction vibration is generally associated with pile driving and rock blasting. However, no pile driving or rock blasting activities are planned for the Project. It is expected that ground-borne vibration from Project construction activities would cause only intermittent, localized intrusion. Ground vibration levels associated with various types of construction equipment are summarized on Table 8-5 of the Noise Analysis. Based on the representative vibration levels presented for various construction equipment types, it is possible to estimate the potential Project construction vibration levels using the vibration assessment methods defined by the Federal Transit Administration (FTA).

Using the vibration source level of construction equipment provided on Table 8-5 of the Noise Analysis and the construction vibration assessment methodology published by the FTA, it is possible to estimate the Project vibration building damage impacts. Table 3-21 presents the expected Project related vibration levels at the nearby building structure locations. At distances ranging from 10 to 1,531 feet from the Project construction boundary to the receiver building locations, construction vibration velocity levels are estimated to range from 0.000 to 0.0352 peak particle velocity (PPV) (measured in inches per second [in/sec]). Based on maximum acceptable vibration threshold identified in the PVCCSP EIR of 0.5 PPV in/sec, the typical Project construction vibration levels would not exceed the building damage thresholds at all receiver building locations. Therefore, the Project-related vibration impacts are considered less than significant. In addition, the typical construction vibration levels are unlikely to be sustained during the entire construction period. Rather, they would occur only during the times that heavy construction equipment is operating adjacent to the Project site boundaries.

TABLE 3-21 CONSTRUCTION EQUIPMENT VIBRATION LEVELS

	Distance to		Typical Const P	ruction Vibr	ation Levels		Thresholds	Threeholde
Receiver ¹	Const. Activity (Feet) ²	Small bulldozer	Jackhammer	Loaded Trucks	Large bulldozer	Highest Vibration Level	PPV (in/sec) ⁴	Thresholds Exceeded? ⁵
R1	12'	0.009	0.105	0.229	0.268	0.268	0.5	No
R2	10'	0.012	0.138	0.300	0.352	0.352	0.5	No
R3	1,531'	0.000	0.000	0.000	0.000	0.000	0.5	No
R4	228'	0.000	0.001	0.003	0.003	0.003	0.5	No

¹Receiver locations are shown on Exhibit 35.

Source: (Urban Crossroads, 2023f. Table 8-6)

13c. Less Than Significant Impact. The Project site is not in the vicinity of a private airstrip and would not expose people to excessive noise levels. The nearest private airport is the Perris Valley Airport, located approximately 6.6 miles south of the Project site. No impact related to noise from private a private airstrip would result.

MARB/IPA is approximately 0.6-mile northeast of the Project site. The MARB/IPA ALUCP includes the policies for determining the land use compatibility of the Project because it is located within 2.0 miles of an airport runway. The Project site is within an area designated as Compatibility Zone C-1 in the 2014 MARB/IPA ALUCP. Compatibility Zone C-1 is considered to have a moderate to high noise impact and is outside the 65 dBA CNEL noise level contour boundaries. In 2018, MARB published an update to the MARB's AICUZ study that has not yet been incorporated into the MARB/IPA ALUCP. The 2018 AICUZ study provides new noise contours for the airport. Table MA-2 of the MARB/IPA ALUCP indicates that sensitive receptors, noisesensitive non-residential, and hazards to flight are prohibited in this area. The MARB/IPA ALUCP does not identify industrial-use specific noise compatibility standards, and therefore, the City's Land Use Compatibility for Community Noise Exposure included in Exhibit N-1 of the Noise Element, is used to assess potential aircraft-related noise levels at the Project site. The City's General Plan Noise Element indicates that industrial uses, such as the Project, are considered normally acceptable with exterior noise levels of up to 70 dBA CNEL. As shown on Exhibit 3-A of the Noise Analysis included in Appendix L of this Initial Study, the Project site is located outside the 65 dBA CNEL noise level contour boundary. The Project would not expose people working at the site to excessive noise levels from airport operations. This impact would be less than significant and no mitigation is required.

² Distance from Project construction boundary to the receiver building structure.

³ Based on the Vibration Source Levels of Construction Equipment (Table 8-6 of Appendix L).

⁴PVCCSP EIR, Page 4.9-27.

⁵ Does the peak vibration exceed the acceptable vibration thresholds?

[&]quot;PPV" = Peak Particle Velocity

14. POPULATION AND HOUSING

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

EXPLANATION OF CHECKLIST ANSWERS

14a. Less Than Significant Impact. According to the United States Census Bureau (USCB), the City's population, as of April 1, 2020, was 78,700 persons (USCB, 2022). The SCAG projections, as identified in *Connect SoCal*, estimate the population of the City will grow to 121,000 residents and 26,400 employees by the year 2045 (SCAG, 2020). The Project does not involve the development of residential uses and would not directly increase the resident population, but the Project would create jobs and increase employment in the City of Perris. The extent to which the new jobs created by a Project are filled by existing residents is a factor that tends to reduce the growth-inducing effect of a Project. The Project would create short-term jobs during the construction phase. These short-term positions would be filled by workers who, for the most part, would already reside in the local area; therefore, construction of the Project would not generate a substantial temporary or permanent increase in population within the Project area.

Table 4.8-E, Development Intensity and Employment Projections, of the PVCCSP EIR, identifies average employment generation factors for the allowed development types identified in the PVCCSP. As this relates to industrial uses, one employee per 1,030 square feet is estimated for Light Industrial floor space. The Project consists of the construction and operation of up to 263,820 square feet of warehouse use which is allowed under the Light Industrial Specific Plan land use designation. Based on this generation factor, the Project could employ approximately 256 new employees²².

The PVCCSP EIR estimates that implementation of the land uses allowed under the PVCCSP would result in the generation of approximately 56,087 jobs/employees in the area (see Table 4.8-E under Section 4.8, Land Use and Planning, and the discussion of "Growth Inducing Impacts" in Section 5 of the PVCCSP EIR). Therefore, the employment generation estimated for the Project (256 employees) represents

²² 263,820-square-foot industrial warehouse use ÷ 1,030 square feet of floor area per employee = 256 employees.

approximately 0.5 percent of the total employment generation anticipated in the PVCCSP planning area and approximately 1.0 percent of the City's projected employment base by 2045. Additionally, similar to the short-term construction jobs, it is anticipated that these new warehouse/distribution positions would be filled by workers who would already reside in the local area. Consistent with the conclusions of the PVCCSP EIR, operation of the Project would not generate a permanent increase in population within the City.

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

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

No Impact. The southwestern portion of the Project site includes two non-conforming legal single-family structures, which are occupied by an industrial use (no residents). There are no individuals residing on the Project site. The Project and construction of the Project would not require the construction of replacement housing and would not displace any existing housing or residents. Since no relocation of existing residents or construction of replacement housing would result from implementing the Project, no impacts would occur, and no mitigation is required.

15. PUBLIC SERVICES

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

Crime Prevention Measures (Section 4.2.1)

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

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

Offsite Infrastructure Standards (Section 5.4)

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

EXPLANATION OF CHECKLIST ANSWERS

15a. Less Than Significant Impact. Fire protection services in the City of Perris are provided by the California Department of Forestry and Fire Protection (CalFire), under contract with and operating as the Riverside County Fire Department (RCFD) for fire and emergency services. RCFD Station 90 is located at 333 Placentia Avenue, approximately 3.0 miles southeast of the Project site.

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

The Project Applicant would be required to pay North Perris Road and Bridge Benefit District (NPRBBD) fees. The NPRBBD comprises approximately 3,500 acres of land located in the northern portion of the City of Perris. The NPRBBD boundary is the same as the boundary of the PVCCSP. The purpose of the NPRBBD is to improve the

efficiency of the financing of specific regional road and bridge improvements that are determined to provide benefit to the developing properties within the NPRBBD boundaries (Perris, 2008). In addition, the NPRBBD includes additional improvements to supplement the Transportation Uniform Mitigation Fee (TUMF) and the City's Developer Impact Fee (DIF) programs (Municipal Code Section 19.68.020). NPRBBD fees include TUMF and DIF fees. The DIF provides a funding source to construct the police, fire, community amenities, government facilities, and roadway infrastructure necessary to mitigate the impacts of the growth expected in the City of Perris over the next 25 years.

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

Sheriff Department (RCSD) for the provision of municipal police services in the City. The Perris Station is located at 137 North Perris Boulevard, approximately 4.9 miles southeast of the Project site. In addition to the City of Perris, this station serves the cities of Glen Valley, Good Hope, Green Acres, Homeland, Juniper Flats, Lake Mathews, Lake Perris, Lakeview, Meadowbrook, Mead Valley, Nuevo, Romoland, Winchester, and Woodcrest (Perris, 2022f). The station includes a traffic enforcement team, forensic services section, and a Special Enforcement team (gang, burglary, and bicycle officers) and provides support for criminal investigations. In addition, the RCSD Special Enforcement Bureau (similar to SWAT), Hazardous Device Team, Hostage Negotiation Team, Central Homicide Unit, canine support, investigative forensics support, and a number of other services are available to all RCSD stations, as needed.

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

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

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

the environment related to the construction of police protection facilities would result with implementation of the Project, and no mitigation is required.

- 15c. Less Than Significant Impact. The Project is located within the boundaries of the Val Verde Unified School District (VVUSD) (VVUSD, 2018). The Project would not directly create a source of students, as the Project does not involve the development of new residential land uses. Therefore, no school-age children would be living at the Project, and no direct demand for school services and facilities would occur. Additionally, as previously discussed, it is expected that the new jobs that would be created by the Project would be filled by individuals that reside in the area. Appropriate developer impact fees, as required by State law, shall be assessed and paid by the Developer to the school district. Section 65995(b) of the California Government Code establishes the base amount of allowed developer fees and allows increases in the base fee every two years. Pursuant to the Leroy F. Greene School Facilities Act of 1998, payment of school impact fees constitutes complete mitigation for project-related impacts to school services under CEQA. School districts are placed into a specific "level" based on school impact fee amounts that are imposed on the development. With the payment of the required fees and with no additional students generated from the Project, no significant impacts to school services would result. The Project would not require the construction of new or expanded school facilities, and any potential environmental impact on schools would be less than significant.
- No Impact. The City's Community Services Department provides community services and recreational and leisure time opportunities and is responsible for the planning, development, and maintenance of the City's parks and recreational facilities. The Project does not include new residential uses and would not result in a direct increase in the population within the City. Thus, no direct demand for parks would be created by the Project. As previously discussed, it is expected that the new jobs that would be created by the Project would be filled by individuals that reside in the area. The Project would include recreational amenities (half court bocce ball) and covered patio areas for its future employees. Additionally, in accordance with Municipal Code Section 19.68.020, the Project would be required to pay its share towards the City's unified DIF program, which funds the acquisition, design, and construction of certain public facilities, including parks. The Project would not require the construction of new or expanded recreational facilities. No impact on parks would occur with the Project.
- No Impact. The Riverside County Library System (RCLS) provides library services in the City through the Perris Branch Library located at 163 East San Jacinto Avenue, approximately 4.9 miles southeast of the Project site. As identified in the PVCCSP EIR Initial Study, development of allowed uses under the PVCCSP, including industrial uses proposed as part of the Project, would not directly increase the demand for library or other public services as no new residential uses would be developed and no direct increase in the resident population would result that may create a demand for library services. As previously discussed, it is expected that the new jobs that would be created by the Project would be filled by individuals that reside in the area. In accordance with Municipal Code Section 19.68.020, the Project would be required to pay its share towards the City's unified DIF program, which funds the acquisition, design, and construction of certain public facilities, including community amenities and government services. The Project would not require the construction of new or expanded library facilities. No impact on library services would occur with the Project.

16. RECREATION

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

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

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

EXPLANATION OF CHECKLIST ANSWERS

result. No mitigation is required.

No Impact. As required by Section 8.2 of the PVCCSP, and further discussed below, the Project would provide onsite employee amenities. The Project would not require the construction or expansion of public recreational facilities or result in or accelerate the physical deterioration of existing neighborhood and regional parks or recreational facilities. This is because the Project does not involve the development of residential uses, and the proposed industrial uses would not create an increase in the use of such facilities. As previously discussed, it is expected that the new jobs that would be created by the Project would be filled by individuals that reside in the area. Additionally, in accordance with Municipal Code Section 19.68.020, the Project would be required to pay its share towards the City's unified DIF program, which funds the acquisition, design, and construction of certain public facilities, including parks. The Project would not require the construction of

new or expanded recreational facilities, and no environmental impacts would

16b. Less Than Significant with Mitigation Incorporated. As shown on the conceptual site plan provided on Exhibit 3, the Project includes a covered outdoor break area/lunch patio, smoking area, and recreational area (bocce ball half court). The impacts associated with construction of the Project have been addressed in this Initial Study. The mitigation measures identified in this Initial Study would reduce the potential impacts associated with construction of the Project, including these amenities, would reduce the potential construction-related impacts to less than significant levels.

17. TRANSPORTATION

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

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

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

Pedestrian Access and Onsite Circulation (Section 4.2.2.3)

- Avoid Conflicts Between Pedestrian and Vehicular Circulation. Provide a system of
 pedestrian walkways that avoids conflicts with vehicle circulation through the utilization of
 separated pathways for direct pedestrian access from public rights-of-way and parking
 areas to building entries and throughout the site with internal pedestrian linkages.
- Primary Walkway. Primary walkways should be 5 feet wide at a minimum and conform to Americans with Disabilities Act (ADA)/Title 24 standards for surfacing, slope, and other requirements.
- Pedestrian Linkages to Public Realm. A minimum 5-foot-wide sidewalk or pathway, at
 or near the primary drive aisle, should be provided as a connecting pedestrian link from
 the public street to the building(s), as well as to systems of mass transit and other onsite
 building(s).

Although no longer required for purposes of CEQA, PVCCSP EIR mitigation measure MM Trans 7 requires the preparation of project-specific transportation analysis to determine whether projects implementing the PVCCSP would result in transportation impacts. However, the City's Transportation Impact Analysis Guidelines (TIA Guidelines) adopted in June 2021 identify that a traffic operations analysis is required for projects that generate more than 50 peak hour trips and more than 500 two-way trips per day (both for actual vehicles and passenger car equivalent [PCE] vehicles).

As discussed previously in Section 2.1, Project Site Location and Setting, of this Initial Study, until July 2022, the Project site was occupied by GRFCO, which operated various industrial uses onsite between 1984 and 2022. The Project site is currently being leased for truck trailer storage; this use occupied the northern and eastern portion of the Project site since 2018 and began leasing the southwestern portion of the Project site in July 2022 when GRFCO vacated the property. These uses currently and historically have involved vehicular trips. Based on the *Patterson Commerce Center (DPR22-00003) Traffic Analysis Scoping Agreement* (March 24, 2023) (Urban Crossroads, 2023c), prepared by Urban Crossroads, provided in Appendix M1 of this Initial Study, when taking into consideration the trip generation from uses operating at the Project site on December 1 and 2, 2021, when the analysis of transportation impacts commenced, the Project is estimated to generate 492 net new average daily trips (ADT), with 38 net new morning (AM) peak hour trips and 52 net new evening (PM) peak hour trips. Therefore, no additional traffic operations analysis is required.

As discussed under Threshold 13a below, PVCCSP EIR mitigation measure MM Trans 4 requires project developers to contact the Riverside Transit Agency (RTA) prior to project approval to determine if the RTA has plans for the future provision of bus routing within any street that is adjacent to the project site that would require bus stops at the project access points. This requirement has been completed.

MM Trans 4

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

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

MM Trans 1

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

MM Trans 2

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

MM Trans 3

Each implementing development project shall participate in the phased construction of offsite traffic signals through payment of that project's fair share of traffic signal mitigation fees and the cost of other offsite improvements through payment of fair share mitigation fees which include TUMF (Transportation Uniform Mitigation Fee), DIF (Development Impact Fee), and the NPRBBD (North Perris Road and Bridge Benefit District)²³. 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 5

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

EXPLANATION OF CHECKLIST ANSWERS

17a. Less than Significant Impact. The Project's consistency with Perris General Plan goals and policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities are analyzed in Table 3-22. As identified, the Project would not conflict with the General Plan goals and policies.

TABLE 3-22 CONSISTENCY WITH CITY OF PERRIS GENERAL PLAN POLICIES

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
Circulation Element	
Policy I.A. Design and develop the transportation system to respond to concentrations of population and employment activities, as designated by the Land Use Element and in accordance with the designated Transportation System, Exhibit 4.2, Future Roadway Network.	Consistent. As described in Section 2.2.2 of this Initial Study, the Project would involve roadway improvements along Nance Street, Patterson Avenue, Washington Street, and Wade Avenue consistent with PVCCSP and the City's General Plan Circulation Element. As part of the Project, these roadways would be constructed to their ultimate half-width per the applicable roadway classifications. The roadway classifications for the roadways in the vicinity of the Project are based on the anticipated traffic volumes that would be generated by PVCCSP uses, such as the Project.
Policy I.B. Support development of a variety of transportation options for major employment and activity centers including direct access to commuter facilities, primary arterial highways, bikeways, park-n-ride facilities, and pedestrian facilities.	Consistent. Roadway improvements included as part of the Project would be constructed according to the standards of the City of Perris and would include sidewalks, as required by the PCVVSP. The existing Class II Bicycle Lane (on-street striped) along Patterson Avenue would be accommodated with the proposed site-adjacent roadway improvements, and onsite accommodations for bicyclists, such as bicycle parking, would also be provided, as required, and would encourage this alternative mode of transportation.
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.	Consistent. The Project maintains the existing roadway network and provides roadway improvements consistent with the PVCCSP requirements.
Policy III.A Implement a transportation system that	Consistent. The Project incorporates a

²³ The purpose of the NPRBBD is to improve the efficiency of the financing of specific regional road and bridge improvements that are determined to provide benefit to the developing properties within the NPRBBD boundaries. In addition, the NPRBBD includes additional improvements to supplement the TUMF and the City's DIF programs. NPRBBD fees include TUMF and DIF fees.

GENERAL PLAN POLICY	CONSISTENCY ANALYSIS
accommodates and is integrated with new and existing development and is consistent with financing capabilities.	transportation system that builds upon and improves the existing roadways in the area to support existing development and the Project. In addition to the construction of roadways, the Project Applicant would pay applicable traffic mitigation fees (e.g., NPRBBD fees) that would fund additional traffic improvements to General Plan roadways in the Project area and would go toward the maintaining roadway infrastructure in the Project area.
Policy V.A. Provide for safe movement of goods along the street and highway system.	Consistent. All roadway construction and improvements would be completed according to the standards and requirements set forth by the City of Perris and in coordination with the City Engineer to ensure that roadways are safe and efficient.
Policy VII.A. Implement the Transportation System in a manner consistent with Federal, State, and local environmental quality standards and regulations.	Consistent. This Initial Study has been prepared in accordance with the State CEQA Guidelines, and pursuant to the City's TIA Guidelines, the Project's trip generation was estimated to determine if a traffic analysis would be required for the Project. As discussed above, a traffic analysis evaluation is not required. Through the required public review of the Initial Study, public agencies can comment on the Project and its consistency with the applicable standards and regulations. By considering the comments of these agencies throughout the development process, the Project would maintain consistency.

In compliance with PVCCSP EIR mitigation measure MM Trans 1, and described in Section 2.2.2 of this Initial Study, the roadway improvements that would be constructed as part of the Project along the site boundaries on Nance Street, Patterson Avenue, Washington Street, and Wade Avenue would comply with the general alignments and right-of-way sections in the PVCCSP. The Project also would pay its fair share of mitigation fees for traffic signals and offsite roadway improvements through the NPRBBD, which includes fees for the TUMF program and the City of Perris DIF (PVCCSP EIR mitigation measure MM Trans 3). With compliance with applicable mitigation measures from the PVCCSP EIR, the Project would not conflict with policies and regulations associated with the roadway circulation system.

With respect to alternative modes of transportation, the City of Perris General Plan identifies alternate modes of transportation as being bus, rail, or pedestrian. The City is currently served by the RTA, a public transit agency serving the unincorporated Riverside County region. There are currently no existing bus routes along the roadways adjacent to the Project site; the nearest existing routes are Route 19 along Perris Boulevard, approximately 1.7 miles southeast and Route 41 along Ramona Expressway, approximately 0.7 mile south of the Project site. There are no bus stops in proximity to the Project site. In compliance with PVCCSP EIR mitigation measure MM Trans 4, the RTA was contacted regarding its plans for the future provision of bus routing adjacent to the Project site that could require bus stops at the Project boundaries. The RTA indicated that it currently has no plans to implement bus routes on the streets surrounding the Project site (RTA, 2022).

The PVCCSP identified the Perris Valley Rail Line (PVL), which was planned as part of RCTC's Metrolink system. This passenger train is now in operation and runs from

the Los Angeles Union Station to the Perris-South Station on A Street (near the Orange Empire Railway Museum). The PVL uses the tracks parallel and west of I-215, west of the Project site. Stops along the PVL include the Perris-Downtown Station and Moreno Valley/March Field Station.

The PVCCSP Standards and Guidelines incorporate pedestrian paths and sidewalks into roadway design and provide for trails to accommodate non-motorized forms of transportation throughout the PVCCSP planning area. As shown on Exhibit 9, Street Sections, of this Initial Study, sidewalks would be constructed along each of the roadways adjacent to the Project site, which would allow direct pedestrian access and movement from the Project site to other areas within the PVCCSP planning area. Additionally, consistent with PVCCSP Standard and Guideline 4.2.2.3, the sidewalks would extend onto the Project site, providing access to the proposed building and parking areas. Pedestrian pathways to be implemented as part of the Project are shown on the Conceptual Site Plan provided on Exhibit 3.

As shown on Figure 3.0-5, Trails System, of the PVCCSP, and the consistent with the *City of Perris Active Transportation Plan* adopted in December 2020 (Perris, 2020), the nearest identified trail within the PVCCSP planning area is a regional trail along Ramona Expressway located approximately 0.7 mile south of the Project site. The Project's proposed roadway improvements would not connect to the existing trail system; however, would facilitate ultimate bicycle and pedestrian facility connections once other development is completed in the area.

According to the PVCCSP the Active Transportation Plan, a Class II Bicycle Lane is defined as a striped lane for one-way bike travel on a street or highway. These bikeways would allow bicyclists and vehicles to share the roadway and avoid potential conflicts between bicycles and vehicle circulation. Based on review of the Active Transportation Plan, in the vicinity of the Project site, there is an existing Class II Bicycle Lane along Patterson Avenue; this bicycle lane would also be accommodated with the proposed roadway improvements adjacent to the Project site. Further, as required by PVCCSP Trans 5, the Project would provide bicycle parking onsite to accommodate those workers choosing to ride bicycles to and from work. As previously identified, the Project would also involve the construction of sidewalks along the site boundaries in accordance with the PVCCSP and City standards (PVCCSP EIR mitigation measure MM Trans 1).

In summary, the Project would not conflict with regional or local programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact is less than significant.

17b. Less than Significant Impact. SB 743, approved in 2013, changes the way transportation impacts are determined according to CEQA. Updates to the State CEQA Guidelines approved in December 2018 included the addition of CEQA Guidelines Section 15064.3, of which Subdivision "b" establishes criteria for evaluating a project's transportation impacts based on project type and using automobile vehicle miles traveled (VMT) as the metric; auto delay is no longer considered a significant impact under CEQA. As a component of OPR's revisions to the CEQA Guidelines, lead agencies were required to adopt VMT thresholds of significance by July 1, 2020.

As previously discussed, the City of Perris adopted its TIA Guidelines in June 2020. All discretionary land use projects subject to CEQA must evaluate transportation impacts related to VMT as part of the environmental review process. The first step in

evaluating a land use project's VMT impact is to perform an initial screening assessment utilizing the City of Perris VMT Scoping Form for Land Use Projects (hereinafter referred to as VMT Scoping Form). The VMT Scoping Form provides an easy-to-use tool for streamlining the VMT analysis process. Screening criteria can be used to determine whether a project would be expected to cause a less than significant impact without having to conduct a detailed study. The screening criteria adopted by the City of Perris are based on the recommendations from OPR and the Western Riverside Council of Governments (WRCOG) for setting screening thresholds for land use projects and include: a project that provides 100 percent affordable housing, a project within one-half mile of qualifying transit, a project that is a local serving land use, a project in a low VMT area, and a project with net daily trips less than 500 ADT.

As required by the City's TIA Guidelines, an initial screening assessment utilizing the City of Perris VMT Scoping Form was completed for the Project by Urban Crossroads (Urban Crossroads, 2023g) and is included in Appendix M2 of this Initial Study. The City Guidelines state that projects that generate a net increase of less than 500 ADT would not cause a substantial increase in total citywide or regional VMT and are presumed to have a less than significant impact. Trips generated by the Project are estimated on trip generation rates collected by the Institute of Transportation Engineers (ITE) *Trip Generation Manual* 11th Edition (2021). According to the VMT Evaluation, the Project is anticipated to generate a net increase of 492 ADT (Urban Crossroads, 2023g). Therefore, the Project would generate a net increase in daily vehicle trips below the 500 daily vehicle trip threshold and impacts would be less than significant.

17c. Less than Significant Impact. Roadway improvements in and around the Project site would be designed and constructed to satisfy all City and/or PVCCSP requirements for street widths, corner radii, and intersection control. They also would incorporate applicable design standards for Project access. As discussed in Section 2, Project Description, of this Initial Study, roadways adjacent to the Project site would be improved as part of the Project; and six driveways into the Project site would be provided. The driveways along Wade Avenue and Nance Street would be unsignalized full-access driveways for passenger cars only. The driveway along Patterson Avenue would be right-in/right-out and designated for passenger cars only. The driveways along Washington Street would be unsignalized full-access driveways for trucks only. In compliance with PVCCSP EIR mitigation measure MM Trans 2, the sight distance at the Project driveways would be reviewed by the City for compliance with the City's and PVCCSP sight distance standards during the plan check process; appropriate sight distance would be provided to avoid hazards.

Additionally, to avoid potential conflicts with truck and automobile traffic, pedestrian walkways would be provided along northwest corner, northeast, and southeast sides of the proposed building to accommodate pedestrians walking to and from the building. Additionally, pedestrian walkways would be provided along the southwest corner of the proposed basin, connecting to the proposed bocce ball court/artificial turf area and along the southern portion of the proposed Patterson Avenue driveway.

The Project does not include any design features that would increase traffic hazards due to geometric design features. The Project is consistent with the onsite and surrounding land use and zoning designations, and implementation of the Project would not introduce incompatible uses to the Project area. Impacts related to traffic hazards would be less than significant and no mitigation is required.

17d. Less than Significant Impact. Construction activities that may temporarily restrict vehicular traffic flow would be required to implement adequate measures to facilitate the passage of pedestrians, bicyclists, and vehicles through/around any required road closures. Site-specific activities such as temporary construction activities are finalized on a project-by-project basis by the City and are required to ensure adequate emergency access. The roadway improvements that would occur as a part of the Project would improve traffic circulation in the area, in accordance with the PVCCSP. These would also improve the ability of emergency vehicles to access the Project site and surrounding properties.

Regional access to the Project site would be provided via I-215 at the Harley Knox Boulevard interchange. The City designated truck route that is in proximity to the Project site is Harley Knox Boulevard (approximately 0.3 mile north). As shown on Exhibit 2 of the Traffic Analysis Scoping Agreement included in Appendix M1, trucks would enter/exit the Project site via the driveways along Washington Avenue and then would travel on Patterson Avenue to access Harley Knox Boulevard. The Project driveways have been designed to accommodate large trucks with trailers that would be used for the distribution of goods to and from the site. As discussed above, adequate turn radii and sight distance would be provided. Thus, the Project would provide ample vehicular access for emergency vehicles.

The Project is required to comply with the City's development review process including review for compliance with all applicable fire code requirements for access to the site. The Project would be reviewed by the RCFD to determine the specific fire requirements applicable to the Project and to ensure compliance with these requirements. This would ensure that the Project would provide adequate emergency access to and from the site. Therefore, impacts are less than significant and no mitigation is required.

18. TRIBAL CULTURAL RESOURCES

Wo	uld the l	Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Cause a of a Resource place, of in terms place, of	a substantial adverse change in the significance tribal cultural resource, defined in Public ces Code section 21074 as either a site, feature, cultural landscape that is geographically defined to five the size and scope of the landscape, sacred or object with cultural value to a California Native an 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				\boxtimes
	ii)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource				

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

No Standards and Guidelines included in the PVCCSP are related to cultural resources. As previously discussed in the Cultural Resources section of this Initial Study, PVCCSP EIR mitigation measure MM Cultural 1 outlines the requirements for preparation of a Phase I Cultural Resources Study, which has been completed through preparation of the *Cultural Resources Study for the Patterson Commerce Center Project* prepared by BFSA (March 2023) (BFSA, 2023a). The Cultural Resources Study is included in Appendix D of this Initial Study and is summarized herein. Project-level mitigation measures MM 5-1 and MM 5-2 included in the Cultural Resources section of this Initial Study implement PVCCSP EIR mitigation measures MM Cultural 2 through MM Cultural 4 and MM Cultural 6, as subsequently revised by the City of Perris.

EXPLANATION OF CHECKLIST ANSWERS

Section 4.4, Cultural Resources, of the PVCCSP EIR, includes a detailed discussion of the environmental setting for cultural resources, including geologic setting, ethnohistoric setting, archaeological setting, and historic setting. This information remains applicable to the Project. Following is a summary of information provided in the Project-specific Cultural Resources Study relevant to tribal cultural resources.

Paleo Indian, Archaic Period Millingstone Horizon, and the Late Prehistoric Takic groups are the three general cultural periods represented in Riverside County. The discussion of the cultural history of Riverside County presented in the Cultural Resources Study included in Appendix D of this Initial Study references the San Dieguito Complex, Encinitas Tradition, Milling Stone Horizon, La Jolla Complex, Pauma Complex, and San Luis Rey Complex, since these culture sequences have been used to describe archaeological manifestations in the region. The Late Prehistoric component present in the Riverside County area was represented by the Cahuilla, Gabrielino, and Luiseño Indians. Absolute chronological information, where possible, is incorporated in the Cultural Resources Study to examine the effectiveness of continuing to interchangeably use these terms.

Cultural periods are summarized in the Cultural Resources Study included in Appendix D; the protohistoric and ethnohistoric periods, which are particularly relevant to tribal cultural resources are summarized below.

Protohistoric and Ethnohistoric Periods

Ethnohistoric and ethnographic evidence indicates that three Takic-speaking groups occupied portions of Riverside County: the Luiseño, the Cahuilla, and the Gabrielino. Following is a discussion of the three Takic-speaking groups. The geographic boundaries between the three groups in pre- and proto-historic times are difficult to place, but the Project site is well within the borders of ethnographic Luiseño territory. This group was a seasonal hunting and gathering people with cultural elements that were very distinct from Archaic Period peoples. When

contacted by the Spanish in the sixteenth century, the Luiseño occupied a territory bounded on the west by the Pacific Ocean, on the east by the Peninsular Ranges mountains at San Jacinto (including Palomar Mountain to the south and Santiago Peak to the north), on the south by Agua Hedionda Lagoon, and on the north by Aliso Creek in present-day San Juan Capistrano. The Luiseño occupied sedentary villages most often located in sheltered areas in valley bottoms, along streams, or along coastal strands near mountain ranges. Villages were located near water sources to facilitate acorn leaching and in areas that offered thermal and defensive protection. Villages were composed of areas that were publicly and privately (by family) owned. Publicly owned areas included trails, temporary campsites, hunting areas, and guarry sites. The most important food source for the Luiseño was the acorn, and seeds, particularly of grasses, composites, and mints, were also heavily exploited. Hunting augmented this vegetal diet; hunting implements included the bow and arrow. The Luiseño had a well-developed basket industry. Baskets were used in resource gathering, food preparation, storage, and food serving. Social groups within the Luiseño nation consisted of patrilinear families or clans, which were politically and economically autonomous. Several clans comprised a religious party, or nota, which was headed by a chief who organized ceremonies and controlled economics and warfare.

At the time of Spanish contact in the 16th century, the Cahuilla occupied territory that included the San Bernardino Mountains, Orocopia Mountain, and the Chocolate Mountains to the west, Salton Sea and Borrego Springs to the south, Palomar Mountain and Lake Mathews to the west, and the Santa Ana River to the north. The Cahuilla differ from the Luiseño and Gabrielino in that their religion is more similar to the Mohave tribes of the eastern deserts than the Chingichngish religious group of the Luiseño and Gabrielino. Cahuilla villages were typically permanent and located on low terraces within canyons in proximity to water sources. These locations proved to be rich in food resources and also afforded protection from prevailing winds. Villages had areas that were publicly owned and areas that were privately owned by clans, families, or individuals. The Cahuilla's use of plant resources is well documented. Plant foods harvested by the Cahuilla included valley oak acorns and single-leaf pinyon pine nuts. The Cahuilla were also hunters; hunting implements included the bow and arrow, throwing sticks, and clubs. The Cahuilla was not a political nation, but rather a cultural nationality with a common language. Clans were composed of 3 to 10 lineages; each lineage owned a village site and specific resource areas. A system of ceremonial hierarchy operated within each lineage.

The territory of the Gabrielino covers much of present-day Los Angeles and Orange counties; however, trade of materials and resources controlled by the Gabrielino extended as far north as the San Joaquin Valley, as far east as the Colorado River, and as far south as Baja California. Gabrielino lived in permanent villages and occupied smaller resource-gathering camps at various times of the year depending upon the seasonality of the resource. Larger villages were comprised of several families or clans, while smaller, seasonal camps typically housed smaller family units. Permanent villages were located along rivers and streams and in sheltered areas along the coast. The social structure of the Gabrielino is little known; however, there appears to have been at least three social classes: 1) the elite, which included the rich, chiefs, and their immediate family; 2) a middle class, which included people of relatively high economic status or long-established lineages; and 3) a class of people that included most other individuals in the society. Villages were politically autonomous units comprised of several lineages. Each lineage had its own leader, with the village chief coming from the dominant lineage.

Tribal Cultural Resources

BFSA conducted pedestrian survey of the Project site on February 23, 2022. No tribal cultural resources (or any other resources) were discovered during the survey.

- **No Impact.** As further discussed in the Cultural Resources section of this Initial Study, BFSA conducted a records search at the EIC located at the University of California, Riverside. The results of the records search are provided in the Confidential Appendix of the Cultural Resource Survey, which is available to qualified individuals. Based on the results of the records search, no tribal cultural resources were located within the Project area. According to the records search, 21 archaeological sites within one mile of the Project site were prehistoric resources. Based on this search and review of existing literature related to cultural resources within the Project site, no tribal cultural resources listed or eligible for listing in the CRHR or in a local register of historical resources were identified.
- 18a(ii). Less than Significant with Mitigation Incorporated. In accordance with the requirements of Assembly Bill 52 (AB 52), on July 8, 2022, the City of Perris sent Project notification letters to the following tribes that have requested such notification: Agua Caliente Band of Cahuilla Indians, Morongo Band of Mission Indians, Pechanga Band of Mission Indians, Rincon Band of Mission Indians, Soboba Band of Luiseño Indians. The City provided information to the tribes, as requested, including the technical reports prepared (including the Cultural Resources Survey provided in Appendix D of this Initial Study and the Confidential Appendix available at the City), Project plans, and mitigation. No tribes requested consultation with the City. The consultation period closed on September 13, 2022 and did not result in the identification of tribal cultural resources on or near the Project site. The consultation process has been completed.

In addition to the Native American scoping and consultation completed by the City of Perris pursuant to the requirements of AB 52, and as identified in PVCCSP EIR mitigation measure MM Cultural 1, the City requires consultants completing cultural resources studies to contact NAHC for a sacred land file (SLF) search. BFSA requested a records search of the Sacred Lands Files (SLF) from the NAHC which was positive for the presence of sacred sites or locations of religious or ceremonial importance within the search radius. In accordance with the recommendations of the NAHC, BFSA contacted all tribes listed in the NAHC response letter for additional information. As of the date of the Cultural Resources Study, BFSA has received one response from the Quechan Tribe of the Fort Yuma Reservation, who deferred to tribes more local to the Project area.

A field survey was conducted on February 23, 2022; no cultural resources, including tribal cultural resources, were observed during the field survey. The Project site shows no evidence of the presence of tribal cultural resources; therefore, Native American monitoring of construction activities is not recommended. Nevertheless, the Project site is in proximity to several recorded prehistoric Native American sites, which suggests the project area was utilized prehistorically for food collection and processing. Without mitigation, construction activities including excavation could encounter unknown tribal cultural resources resulting in a potentially significant impact. Project-level mitigation measure MM 5-1 (presented in the Cultural Resources section of this Initial Study) implements PVCCSP EIR mitigation measures MM Cultural 2 through MM Cultural 4, as subsequently revised by the City, requires that Native American representatives be notified if any artifacts of Native American origin are discovered, and identifies steps that would be taken to ensure potential impacts to tribal cultural resources are less than significant. Project-level mitigation measure MM 5-2 (presented in the Cultural Resources section of this Initial Study) implements PVCCSP EIR mitigation measure MM Cultural 6, as subsequently revised by the City,

and identifies actions to be taken in the event that human remains are found. With implementation of Project-level mitigation measures MM 5-1 and MM 5-2, potential impacts to tribal cultural resources would be less than significant.

19. <u>UTILITIES AND SERVICE SYSTEMS</u>

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	uld the Project:				
a)	Require or result in the relocation or construction of new or expanded water, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				
b)	Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?			\boxtimes	
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?			\boxtimes	
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				\boxtimes

APPLICABLE PVCCSP STANDARDS AND GUIDELINES AND MITIGATION MEASURES

No PVCCSP Standards and Guidelines or PVCCSP EIR mitigation measures are related to the analysis of utilities and service systems presented in this Initial Study.

EXPLANATION OF CHECKLIST ANSWERS

19a. Less Than Significant Impact. As described in Section 2.2.4, Proposed Utility Infrastructure, of this Initial Study, the Project would include the construction of an onsite network of water, wastewater, storm drain, natural gas, electric, and telecommunications utility infrastructure that would connect to existing or proposed utility infrastructure adjacent to or in the vicinity of the Project site. The proposed utility infrastructure to be installed along Nance Street (recycled water), Washington Street (water and storm drain) and Patterson Avenue (recycled water, sewer, storm drain) are shown on Exhibit 15. These utility lines would be within the public roadway right-of-way adjacent the Project site, with the exception the proposed sewer line extending that would extend north on Patterson Avenue to Harley Knox Boulevard, and the proposed recycled water line that would extend south along Patterson Avenue to a

connection just north of Markham Street. The installation of the proposed infrastructure improvements would result in physical environmental impacts; however, these impacts have already been included in the analyses of construction-related effects presented throughout this Initial Study. As identified through the analysis presented in this Initial Study, with implementation of required PVCCSP EIR mitigation measures, the construction of infrastructure necessary to serve the Project would not result in any significant physical effects on the environment. This impact would be less than significant and no additional mitigation measures beyond those identified throughout this Initial Study for potential construction impacts would be required.

19b. Less Than Significant Impact. The Project site is located within the service area of the EMWD, which would supply water to the Project. Section 4.11, Utilities and Service Systems, of the PVCCSP EIR discusses the following related regulations applicable to the analysis of water supply: the Water Conservation in Landscaping Act (Sections 13550–13556 of the California Water Code), the Urban Water Management Planning Act, California Water Supply Laws (preparation of a Water Supply Assessment (WSA)), the Water Conservation Act, the Riverside County Water Efficient Landscape Requirements Ordinance, EMWD Policies, and City of Perris General Plan measures.

In compliance with Sections 10910–10915 of the California Water Code (commonly referred to as "Senate Bill 610" (SB 610) according to the enacting legislation), a WSA was prepared for the PVCCSP to assess the impact of development allowed by the PVCCSP on existing and projected water supplies. The EMWD approved this WSA in July 2011 and determined that existing and planned EMWD water supplies are sufficient to meet project-related demands. Subsequently, and as discussed below, the EMWD adopted its updated 2020 UWMP, which contains more accurate projections for water supply and ability to serve uses within its service area, including the PVCCSP planning area. The Project is being developed within the PVCCSP planning area and is consistent with the PVCCSP land use and growth assumptions assumed in the WSA prepared for the PVCCSP.

Based on the water usage assumptions presented in Table 4.11-D, Perris Valley Commerce Center Project Water Usage, of the PVCCSP EIR, the Project is anticipated to have a projected water demand of approximately 10.6^{24} acre-feet per year (afy). This is approximately 0.4 percent of the projected water usage from the entire PVCCSP planning area (2,671.5 afy). However, based on more stringent water conservation requirements currently in place compared to when the PVCCSP EIR was prepared, the water demand from the Project is anticipated to be less.

The EMWD adopted its 2020 UWMP, which details the reliability of the EMWD's current and future water supply. The EMWD has four sources of water supply: imported water from the Metropolitan Water District of Southern California (MWD), potable groundwater, desalinated groundwater, and recycled water. As outlined in the 2020 UWMP, the EMWD has the ability to meet current and projected water demands through 2045 during normal, historic single-dry and historic multiple-dry year periods using imported water from the MWD with existing supply resources. Planned local supplies will complement imported supplies and improve reliability for the EMWD and the region. The EMWD will continue to rely on imported water from the MWD as the main source of supply for its retail and wholesale customers yet recognizes the need to increase local supplies and water conservation to manage supply and demand. Based on the information provided in the MWD's UWMP, the MWD has sufficient

²⁴ 14.2 net acres x 0.75 afy (demand rate)

supply capabilities to meet the expected demands of its member agencies from 2020 through 2045 under normal, historic single-dry and historic multiple-dry year conditions. In February 2008, the MWD adopted its Water Supply Allocation Plan (WSAP) to allocate water based on need during periods of mandatory imported water allocations throughout the region. The WSAP contains a specific formula and methodology to determine member agency supply allocations. In the event allocation is required, the WSAP establishes base period demands and then adjusts them for population growth and changes in local supply; it then calculates the water supply allocation for each member agency based on the calculated needs. If another multiple-dry year period were to occur over the next five years, the MWD could declare an allocation. The EMWD is able to respond to a potential allocation through implementation of its WSCP and its balance of carry over credits in the Hemet/San Jacinto Management Plan Area. (EMWD, 2021b)

The EMWD's future year water demand forecasts are based on SCAG's regional projections, which rely on the adopted land use designations contained within the general plans that cover the geographic areas within the EMWD's service area. Because the Project would be consistent with the PVCCSP's land use designation for the site, the water demand associated with the Project was considered in the demand anticipated by the 2020 UWMP and analyzed therein. As stated above, the EMWD expects to have adequate water supplies to meet all its demands until at least 2045; therefore, the EMWD has sufficient water supplies available to serve the Project from existing entitlements/resources and no new or expanded entitlements are needed. Accordingly, impacts would be less than significant and mitigation is not required.

19c. Less Than Significant Impact. As identified in the PVCCSP EIR Initial Study (Section 12, Utilities and Service Systems), the EMWD would provide sanitary sewer service to the Project. Wastewater generated by the Project would be treated at the Perris Valley Regional Water Reclamation Facility (PVRWRF) located south of Case Road and west of the I-215 Freeway. The PVRWRF currently treats an estimated 15.5 million gallons per day (mgd) but has a current capacity of 22 mgd; the PVRWRF has the potential to expand capacity to 100 mgd (EMWD, 2021c).

The PVCCSP EIR estimates that future development under the PVCCSP would generate approximately 5.3 mgd of wastewater to be treated at the PVRWRF. The EIR concludes that wastewater treatment capacity is adequate to serve the future development allowed by the PVCCSP in addition to existing wastewater generation in the EMWD service area because (1) the total estimated wastewater generation from the PVCCSP is within the available (i.e., excess) capacity of the PVRWRF (15 mgd at the time of PVCCSP EIR preparation); (2) the PVRWRF has been expanded to treat 22 mgd; and (3) the EMWD has the ability to reduce diverted flows to the PVRWRF, as the wastewater diversions are solely operational decisions.

Based on the wastewater generation factor of 1,700 gallons per day per acre (gpd/acre) for Light Industrial land use designations applied in the PVCCSP EIR (refer to Table 4.11-I, PVCC Projected Generation of Wastewater), the Project would generate approximately 23,970 gpd (0.02 mgd) of wastewater that would be treated at the PVRWRF. As such, the Project's wastewater generation represents approximately 0.4 percent of the PVCCSP's total estimated wastewater generation (5.3 mgd). Therefore, the Project is within the anticipated wastewater generation for the PVCCSP and could be adequately treated at the PVRWRF. There would be a less than significant impact related to wastewater treatment capacity and no additional mitigation is required.

19d. Less Than Significant Impact. Trash, recycling, and green waste service in the City of Perris is provided by CR&R Waste Services. In addition to normal trash collection, the County of Riverside also sponsors several hazardous waste collection events throughout the year. Waste is transported to the Perris Transfer Station and Materials Recovery Facility located at 1706 Goetz Road, approximately 6.0 miles south of the Project site. At this facility, recyclable materials are separated from solid wastes. Recyclable materials are sold in bulk and transported for processing and transformation for other uses. Solid waste produced from the Project would be transported to either (1) the Badlands Landfill on Ironwood Avenue in Moreno Valley, which has a permitted daily capacity of 4,800 tons per day (tpd) or (2) the El Sobrante Landfill on Dawson Canyon Road in Corona, with a permitted daily capacity of 16,054 tpd (CalRecycle, 2022a; CalRecycle, 2022b).

Construction-Related Solid Waste

The PVCCSP EIR estimates that construction of future development under the PVCCSP would generate approximately 104,671.09 tons of solid waste over the 20-year construction period, which was determined to be approximately 0.10 percent of the combined annual capacity (i.e., yearly intake) of the Badlands and El Sobrante Landfills (see PVCCSP EIR Table 4.11-J, Estimated Construction-Related Solid Waste Generation and Contribution). The PVCCSP EIR concludes that, with development of the PVCCSP, construction-related solid waste would not substantially contribute to exceeding the permitted capacity of these landfills.

Based on the U.S. Environmental Protection Agency's (USEPA's) new construction waste generation rate of 3.89 pounds per square-foot for Light Industrial uses, as applied in the PVCCSP EIR, construction of the proposed 263,820 square feet of industrial warehouse/distribution uses would generate approximately 513.1 tons of solid waste over the construction period. This represents approximately 0.5 percent of the estimated construction solid waste stream from the development of allowed PVCCSP uses, which was determined to be accommodated by the landfills serving the City. Construction of the Project is anticipated to occur over a period of approximately 10 months (285 days), which corresponds to an average of approximately 1.8 tons of construction waste generated per day from building construction activity. However, based on more stringent requirements for waste reduction and diversion from landfills (discussed in Threshold 19e, below), it is anticipated the solid waste generated by the Project during construction that would be diverted to landfills would be reduced compared to the estimate in the PVCCSP EIR. Therefore, the disposal of construction-related solid waste associated with the Project would not exceed the permitted capacity of the Badlands or El Sobrante Landfills, and the impact would be less than significant.

Operational Solid Waste

The PVCCSP EIR estimates that operation of future development under the PVCCSP would generate approximately 544,048.96 tons per year of solid waste, which was determined to be approximately 10.65 percent of the combined annual capacity (i.e., yearly intake) of the Badlands and El Sobrante Landfills (see Table 4.11-K, Anticipated Solid Waste Generation and Contribution). The PVCCSP EIR concludes that, with development of the PVCCSP, operational solid waste would not substantially contribute to exceeding the permitted capacity of these landfills.

Based on the operational solid waste disposal factor of 0.0108 ton per square-foot per year for the Light Industrial land use designation of the PVCCSP used in the PVCCSP EIR, the Project's 263,820 square feet of proposed industrial warehouse/distribution uses would generate approximately 2,849.3 tons/year of solid waste requiring landfill disposal. This represents approximately 0.5 percent of the estimated annual operational solid waste stream from the development of allowed PVCCSP uses, which was determined to be accommodated by the landfills serving the City. However, based on more stringent requirements for waste reduction and diversion from landfills (discussed in Threshold 19e, below), it is anticipated the solid waste generated by the Project during operation that would be diverted to landfills would be reduced compared to the estimate in the PVCCSP EIR. Therefore, the disposal of operational solid waste associated with the Project would not exceed the permitted capacity of the Badlands or El Sobrante Landfills and the impact would be less than significant.

No Impact. Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to decrease solid waste generation through mandatory reductions in solid waste quantities (e.g., through recycling and composting of green waste) and the safe and efficient transport of solid waste. The Project would be required to coordinate with CR&R Waste Services to develop a collection program for recyclables, such as paper, plastics, glass, and aluminum, in accordance with local and State programs, including AB 341, Mandatory Commercial Recycling, and the California Solid Waste Reuse and Recycling Act of 1991.

Additionally, the Project would be required to comply with applicable practices enacted by the City under the California Integrated Waste Management Act of 1989 (AB 939) and any other applicable local, State, and federal solid waste management regulations. AB 939 required that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The diversion goal has been increased to 75 percent by 2020 by SB 341. Further, the Solid Waste Disposal Measurement Act of 2008 (SB 1016) was established to make the process of goal measurement (as established by AB 939) simpler, timelier, and more accurate. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population (or in some cases employment); and (2) its disposal, as reported by disposal facilities. In 2020 (the last year data was approved), the City implemented 38 programs to reduce solid waste generation and achieve the increased solid waste diversion required. These programs involve composting, facility recovery, household hazardous waste, policy incentives, public education, recycling, source reduction, and special waste materials. The City had an average disposal rate of 6.2 pounds per resident per day and 23.1 pounds per employee per day in 2020, which does not exceed the established disposal rate target of 6.3 pounds per resident per day but exceeds the disposal rate target of 20.6 pounds per employee per day (CalRecycle. 2020). Notwithstanding, the City and its waste hauler would continue to implement waste management programs required be local and state regulations, and would impose required recycling and waste diversion requirements on the proposed uses.

The CALGreen Code requires all new developments to divert 65 percent of non-hazardous construction and demolition (C&D) debris for all projects. In compliance with these regulations, the Project contractor would submit a waste management plan to the City as part of the building or grading permit. The plan would include the estimated volumes or weights of C&D materials that would be generated, diverted, reused, given away or sold, or landfilled, including vendors and facilities that would

receive the C&D materials. The Project would comply with the CALGreen Code requirements for C&D diversion. In addition, building operators would participate in the City's recycling programs and comply with hazardous waste disposal regulations. As such, the Project would not conflict with any federal, State, or local regulations related to solid waste. Therefore, no impact related to compliance with solid waste statutes would occur and no mitigation is required.

20. WILDFIRE

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	ocated in or near state responsibility areas or lands ald the Project:	classified as	very high fire h	nazard severit	y zones,
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?				\boxtimes
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?				\boxtimes
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?				\boxtimes
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?				\boxtimes
e)	Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				\boxtimes

EXPLANATION OF CHECKLIST ANSWERS

20a-20e. No Impact. According to Exhibit S-5, Wildfire Hazards, of the City General Plan Safety Element, the Project site is not located in or near an area identified as being a "Wildfire Hazard Area" (Perris, 2022c). Additionally, according to the California Department of Forestry and Fire Protection's (Cal Fire) Fire Hazard Severity Zone (FHSZ) Viewer, the Project site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ) of the City (CAL Fire, 2022). The Project site is located within the limits of the City of Perris and is, therefore, not within a State Responsibility Area²⁵. Therefore, the Project would have no impacts related to wildfires or the associated issues identified in Thresholds 20a through e, above. No impacts would occur and further analysis of this issue is not required.

²⁵ The State Responsibility Area (SRA) is the land where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within city boundaries or in federal ownership.

21. MANDATORY FINDINGS OF SIGNIFICANCE

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Do	es the Project:				
a.	Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?				
b.	Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects)?				
C.	Does the Project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?		\boxtimes		

EXPLANATION OF CHECKLIST ANSWERS

21a. Less than Significant with Mitigation Incorporated. The Project site consists of disturbed land cover type and acres of developed land cover type. Additionally, the Project's off-site improvement area consists of developed land cover type. No burrowing owls or evidence of recent or historic use by burrowing owls was observed on the Project site and no other sensitive biological resources, habitat, or species (fish, wildlife, or plant) were located on the Project site. With payment of the required MSHCP mitigation fee and SKR mitigation fee, and with implementation of mitigation MM 4-1 (nesting birds) and MM 4-2 (burrowing owl), impacts to biological resources would be less than significant.

Additionally, potential impacts to historic and archaeological resources are discussed in the Cultural Resources section of this Initial Study, potential impacts to paleontological resources are addressed in the Geology and Soils section, and potential impacts to tribal cultural resources are addressed in the Tribal Cultural Resources section. No impact on historical resources would occur; and potential impacts to archaeological, paleontological, and tribal cultural resources, if encountered during construction, would be less than significant with adherence to the identified Project-specific mitigation measures.

21b. Less than Significant with Mitigation Incorporated. The proposed Project is being developed according to the PVCCSP and is an allowed use under the site's PVCCSP Light Industrial land use designation. The PVCCSP EIR determined that construction associated with all of the uses within the PVCCSP planning area may have cumulatively significant impacts in the following areas:

- Air Quality: Emissions generated by the overall PVCCSP area will exceed the SCAQMD's recommended thresholds of significance;
- Noise: Development in the overall PVCCSP area will result in substantial increases in the ambient noise environment at Project buildout;
- Transportation: Potential cumulative impacts to I-215, which is consistent with the findings in the Perris General Plan.

However, as identified through the analysis presented in this Initial Study, with incorporation of applicable mitigation measures from the PVCCSP EIR and PVCCSP Standards and Guidelines, the Project would have no impact or less than significant impacts related for each topical issue with the exception of aesthetics (construction-related lighting), archaeological resources, geology and soils (paleontological resources), and tribal cultural resources, for which the Project's impacts would be potentially significant prior to incorporation of Project-specific mitigation measures. Because Project impacts would be less than significant after mitigation, impacts associated with the Project would not result in cumulatively-considerable impacts when added to the impacts of other Projects planned or proposed in the vicinity of the site. Cumulative impacts would be less than significant.

21c. Less than Significant with Mitigation Incorporated. With development of the Project site, the Project could create environmental effects that will directly or indirectly cause adverse effects on human beings. These include, but are not limited to, noise and air quality. Implementation of PVCCSP Standards and Guidelines, applicable mitigation measures in the PVCCSP EIR, and Project-specific mitigation measures would reduce these impacts to less than significant levels after mitigation. No significant and unavoidable impacts on human beings would occur with the Project.

SECTION 4.0 REFERENCES

Following is a list of reference used in preparation of this Initial Study, corresponding citations are presented in the Initial Study text, as applicable.

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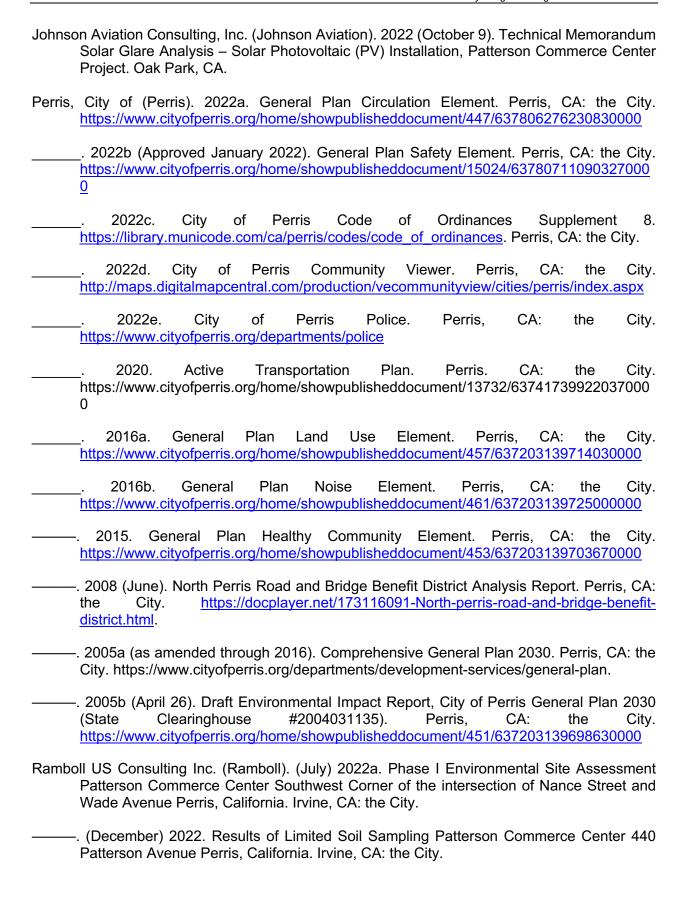
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