

# ADDITIONAL ALTERNATIVES INFORMATION

for

## Perris Valley Commerce Center Specific Plan, Amendment No. 13 SPA19-05287

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## ADDITIONAL ALTERNATIVES INFORMATION

### “EXPRESSWAY COMMERCE CENTER”

#### 1.0 INTRODUCTION

In 2020, PR Partners, LLC (Project applicant) proposed a thirteenth Amendment (SPA19-05287) to the Perris Valley Commerce Center Specific Plan (PVCCSP)(SPA13) and a Development Plan Review (DPR 19-00012) for the development of a 347,918-square-foot light industrial building with 339,918 square feet of non-refrigerated warehouse space and 8,000 square feet of office space. The California Environmental Quality Act (CEQA) requires the City, as the lead agency for this action, to evaluate the potential environmental impacts of the project and determine if its potentially significant impacts can be adequately reduced or eliminated (i.e., mitigated) or if its benefits outweigh its anticipated significant impacts. For this CEQA analysis, the City required preparation of an Environmental Impact Report (EIR), which is the most extensive evaluation that can be performed under CEQA.

As part of the EIR, CEQA and the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines) require an evaluation of alternatives to the proposed action. The purpose of the alternatives evaluation under CEQA is to determine whether one or more feasible alternatives is capable of reducing potentially significant impacts of a preferred project to a less than significant level. The EIR examined a “no project” alternative plus three different development alternatives: (1) Commercial Uses; (2); Lower Intensity Industrial; and (3) Lower Intensity Business/Office Park.

The EIR, along with the original alternatives analysis, was presented to the City Planning Commission on May 18, 2022, and the City Council on July 26, 2022. At that time the Planning Commission and City Council indicated they preferred a smaller warehouse with limited commercial uses (i.e., Alternative 2, Lower Intensity Industrial) to the proposed Project. However, the City Council requested more specific information on potential development and impacts of this Alternative 2 prior to making a decision on the Project and its EIR. Based on comments by the Planning Commission and City Council, the Project applicant has reevaluated the Project and refined Alternative 2 compared to the information presented in the Draft EIR (DEIR).

The following document provides additional information on a “new Alternative 2 Site Plan”, now referred to as the “Expressway Commerce Center”, to clarify its specific development characteristics and potential environmental impacts of this alternative relative to the original proposed Project and EIR information. This material includes a specific site plan and technical environmental analyses of the site plan and its potential impacts.

Prior to evaluating the refined Alternative 2, the following provides some background information to the reader on the general requirements of alternatives in an EIR and specific information on the Project Alternatives in the PVCC SPA13 EIR.

#### 1.1 CEQA Requirements for Alternatives

State CEQA Guidelines Section 15126 states the following:

**Section 15126.6 (a)** *Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain*

*most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.*

**Section 15126.6 (b) Purpose.** *Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.*

CEQA requires the EIR to examine a reasonable range of alternatives as well as alternatives that reduce or eliminate one or more significant impacts of the project. However, it should be noted that, as analyzed in Section 4, Environmental Impact Evaluation and as summarized in Section 1, Executive Summary, the DEIR concluded the Project would not have any significant impacts that could not be mitigated to less than significant levels. Therefore, no alternatives are necessarily needed to reduce one or more significant impacts of the Project as normally required by CEQA for an EIR. The selection of a reasonable range of alternatives would therefore depend more on preferred or acceptable land uses and the degree to which they achieve the objectives of the Project.

## **1.2 Proposed Project**

The EIR Project proposed a Specific Plan Amendment to accommodate the development of a 347,918-square-foot light-industrial warehouse building (which includes 8,000 square feet of office area) on a 16-acre site. The existing and proposed General Plan Land Use Designation for the Project site is Perris Valley Commerce Center Specific Plan (PVCCSP). The existing Zoning classification is also PVCCSP. The existing PVCCSP land use designation for the site is Commercial while the proposed PVCCSP land use designation is Light Industrial. Land uses adjacent to the Project site include undeveloped land and commercial uses to the north; the light industrial Fallas Distribution Center to the south; commercial uses and a mobile home park to the east; and the light industrial Lowes Distribution Center to the west.

The PVCCSP is designed to encourage a mix of land uses that provide interrelated opportunities. The commerce center land use designations include General Industrial (GI), Light Industrial (LI), Business/Professional Office (BPO) and Commercial (C). There are two areas of residential designations that are intended to recognize two existing communities: (1) Residential (R) for the community located south of Markham Street, east of Webster Avenue, and north of Ramona Expressway; and (2) Multi-Family Residential (MFR-14) for the mobile home community located north of Dawes Street and easterly of Perris Boulevard (one block east of the Project site).

## **1.3 Project Objectives**

As discussed in the DEIR, the following are the applicant's objectives for the proposed Project:

- Provide additional warehouse space needed to meet regional demand.
- Provide employment opportunities for local residents.
- Meet the applicable General Plan goals regarding the proposed land use.
- Introduce uses compatible with site constraints and regulatory limitations (e.g., ALUC).

- Develop a project that integrates with and compliments the existing development pattern for this portion of the Ramona Corridor.
- Develop a project that enhances views of this City entryway.
- Provide benefits to the City with increases property tax revenue and new employment while minimizing adverse environmental impacts.
- Develop a project that will be economically feasible and operationally stable to meet the needs of businesses wishing to locate into this portion of the City of Perris

#### **1.4 Constraints on Alternatives Selection**

Section 4.8 of the DEIR, Land Use and Planning, provides the following information regarding the Project's consistency with the Airport Land Use Compatibility Plan (ALUCP) for the nearby March Air Reserve Base as well as related Air Force Safety Zones:

##### **ALUCP Consistency**

The Project site is within the boundaries of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (March ALUCP) which is monitored and maintained by the Riverside County Airport Land Use Commission (ALUC). The Project site is designated for commercial uses at present under the PVCCSP, but the Project applicant proposes light industrial (warehousing) uses. The 15.7-acre site falls within two March ALUCP Compatibility Zones<sup>1</sup> - the western 11.8 acres are within Zone B1-APZ-II and the eastern 3.90 acres are within Zone C1 ("Clear Zone") (see EIR Figure 4.8-3, *Airport Compatibility*). The DEIR Project was submitted to ALUC for consideration and on July 9, 2020, ALUC determined the DEIR Project was consistent with the March ALUCP as long as it complied with a number of site and building design conditions (see Initial Study Subsection V.9, Hazards and Hazardous Materials, and its Mitigation Measure MM-HAZ-3). The ALUC staff report indicated the DEIR Project as proposed was consistent with the various compatibility criteria established for the two onsite zones (B1-APZ-II and C1 – these two zones have different criteria with Zone C1 being the less restrictive).

The reason the proposed DEIR Project was consistent with the compatibility criteria of the two aircraft safety zones is that most of the Project is warehousing which has very few employees per square foot while the office use is located in the C1 zone which has less stringent density requirements (i.e., employees or persons per acre). One of the compatibility measures is the maximum single acre figure. The warehouse portion of the DEIR Project that is within Zone B1-APZ-II has 44 persons per acre while the density criteria for that zone is 50 persons per acre, so the proposed low intensity warehouse use would reach almost 90 percent of the density criteria. It should be noted that the density criteria for commercial uses is substantially higher than the criteria for warehousing or office uses. Given this, it is likely that any reasonable type of commercial project proposed on this site, especially any portion in Zone B1-APZ-II, would exceed the March ALUCP single acre density criteria. Under those circumstances, ALUC staff would be unlikely to recommend approval of all commercial uses on the Project site.

##### **Air Force Safety Zones**

In addition to the March ALUCP safety zones, the Air Force maintains its own safety zone

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<sup>1</sup> New employment generation figures range from 1 employee/1500 square feet (SF) per the PVCCSP up to 1 employee/485 square feet per ALUC. Total Project could generate from 232 employees (347,918 total SF divided by 1500 SF/employee) up to 717 employees (347,918 total SF divided by 485 SF/employee).

restrictions around March Air Reserve Base as part of its Air Installations Compatible Use Zones (AICUZ) program (last updated in 2018). Under the AICUZ program, the DEIR determined the proposed Project site had a maximum density limit of 50 persons per acre in the APZ-II zone as well.

#### Updated ALUCP Consistency

On January 12, 2023, the ALUC found the Revised Alternative 2 Project compatible or consistent with the 2014 March ALUCP and recommended the City adopt modified conditions of approval for the modified Alternative 2 Project (see discussion on Hazards and Hazardous Materials and ALUC Letter in **Appendix E**).

#### **1.5 EIR Alternatives Considered but Rejected**

The PVCCSP currently designates the site for 15.7 acres of commercial uses (approximately 273,557 square feet based on a floor area ratio or FAR of 0.4). This typically becomes the “No Project – General Plan” alternative to be evaluated in the EIR. A variety of commercial uses were considered for the site. While it might be possible to place retail commercial uses on the eastern 3.9 acres of the site in Zone C1, it is problematic whether any type of standard retail commercial project would be consistent with the March ALUCP density criteria for the western 11.8 acres of the site.

Due to the March ALUCP and AICUZ per one acre density limitations, any retail commercial space on the western portion of the site (11.8 acres) would have to be divided up and arranged in eleven (11) separate “units” with 5,750 square feet per acre (FAR 0.13) and two small restaurants on the eastern 3.9 acres. Even this limited physical arrangement would still constitute a “shopping center” which is not allowed within the APZ-II zone per AICUZ. For the purposes of this analysis, the term commercial could also apply to office uses depending on the number of employees generated per square foot. Due to the ALUCP/AICUZ limitations, there does not appear to be any feasible “all retail commercial” or “small offices” alternatives that could be developed on the Project site. Compared to the proposed light industrial use, an “all retail commercial” alternative, could have different localized impacts, primarily potential health risks from more truck traffic relative to passenger vehicle traffic. However, the commercial square footage currently allowed under the General Plan, if developed as retail commercial uses, would have equivalent or greater regional impacts (e.g., traffic, air quality, airport safety) compared to the proposed light industrial use.

The only type of “all commercial” alternative that could be feasible is to place retail uses like a gas station and possibly a small restaurant at the northeast corner of the site, within the C1 zone (i.e., it is also the southwest corner of the Ramona Expressway/Perris Boulevard intersection). The rest of the site could be developed as one or more types of low occupancy commercial uses such as a car dealership, nursery, and/or public storage. Different combinations of these uses are considered under the “No Project – General Plan” Alternative. Several other “low intensity” storage-oriented commercial uses that could meet the ALUCP/AICUZ limitations were also considered under the “No Project – General Plan” Alternative including truck parking/storage or equipment/materials storage. However, these would detract visually from this City “gateway”, so these two specific uses were not considered further. Additionally, in general, lower intensity commercial uses would not generate as many jobs as higher intensity uses. As previously stated, all of the potential “all retail commercial” or “mixed-use commercial/residential” alternatives were rejected as being infeasible due to ALUCP/AICUZ limitations.

In addition to all of the “all commercial” alternatives outlined above; several lower intensity mixed-use (commercial/residential) alternatives were considered. These alternatives would place retail

commercial uses on 3.9 acres in the eastern portion of the site within the C1 zone and low or very low density residential in the western 11.8 acres of the site within the APZ-II zone. However, there were no mixed-use alternatives with medium or higher density residential uses that would meet the ALUCP/AICUZ density limitations. Although higher density residential uses may be consistent in terms of surrounding land uses, the size and location of the site, and especially the ALUCP/AICUZ density limitations, would preclude all but extremely low-density residential uses. Additionally, residential uses do not generate any additional long-term employment opportunities in the City. Therefore, no mixed-use commercial-residential alternatives were selected for more detailed analysis.

The only other non-residential or non-commercial alternatives that would not detract visually from this entry point to the City, provide added employment, and meet the other objectives of both the PVCCSP and the proposed Project to some degree would be “lower intensity warehousing” (with retail at the northeast corner) and “low intensity business/office park” uses.

### **1.6 Alternatives Considered in the DEIR**

Based on the preceding analysis, the DEIR examined the following reasonable range of alternatives to the proposed Project in detail:

- 1) **No Project – No Development.** This alternative would leave the site in its vacant condition.
- 2) **Alternative 1 - Commercial Use.** This “No Project” alternative would implement the existing PVCCSP designation on the site. This alternative includes development of a gas station with 4,500-square-foot convenience store and 16-vehicle fueling positions, 2,200-square-foot fast-food restaurant with drive-through window use in the northeast portion of the site to stay within the C1 zone. This alternative also included the following two options for low intensity or low occupancy commercial uses on the rest of the site: (a) a 1,374-unit Self-Storage Facility; or (b) an 11.90-acre Nursery.
- 3) **Alternative 2 - Lower Intensity Industrial.** This alternative would have approximately 290,000 square feet of only high cube or e-commerce warehousing, not general warehousing, located in the central and western portions of the site. This alternative would have 83% of the floor area compared to 347,918 square feet for the proposed Project. This alternative would also have retail commercial (a gas station and one small restaurant pad as described under Alternative 1) in the northeast portion of the site).
- 4) **Alternative 3 – Low Intensity Business/Office Park.** This alternative would have 76,920 square feet of lower intensity business park/office uses in 4 buildings in the central and western portions of the site. This alternative would also have retail commercial (a gas station and one small restaurant pad as described under Alternative 1) in the northeast portion of the site).

**Table 1, Summary of EIR Alternatives**, provides the summary of information and analysis from the DEIR regarding its three (3) proposed alternatives.

**Table 1  
Summary of EIR Alternatives**

<b>Characteristics</b>	<b>Proposed Project</b>	<b>Alternative 1 Commercial Use</b>	<b>Alternative 2 Lower Intensity Industrial</b>	<b>Alternative 3 Low Intensity Business/Office</b>
<b>Land Use</b>				
Industrial <sup>1</sup>	347,918 SF	0	290,000 SF	0
Retail	0	6,700 SF	6,700 SF	6,700 SF
Commercial	0	0	0	0
Bus. Park/Office	0	0	0	76,920 SF
Other	0	1,374-unit SSF <b>OR</b> 11.9-acre Nursery	0	0
<b>Trip Generation</b>		<b>SSF</b>	<b>Nursery</b>	
Total Vehicles	492	1,704	1,402	1,812
PCE <sup>2</sup>	612	0	0	1,912
Peak AM	42	172	155	158
Peak PM	48	159	130	180
<b>VMT<sup>3</sup></b>		<b>SSF</b>	<b>Nursery</b>	
Amount	<500	>500 (LS)	>500 (LS)	>500 (GS=LS)
Significant?	No	No	No	No

Sources: MFCS 2021 and Urban Crossroads 2021, Tables 2, 4-6 SF = Square Feet SSF = Self-Storage Facility

<sup>1</sup> High-Cube Transload/Short-term Storage Warehouse

<sup>2</sup> Passenger Car Equivalent (PCE) factors were applied to the trip generation rates for heavy trucks (large 2-axles, 3-axles, 4+ axles). PCEs allow the typical “real-world” mix of vehicle types to be represented as a single, standardized unit, such as the passenger car, to be used for the purposes of capacity and level of service analyses.

<sup>3</sup> <500 = projects with under 500 daily trips are considered to have less than significant vehicle miles traveled (VMT) impacts. >500 = projects with over 500 daily trips require more analysis, but presence of a gas station (GS), which generates the majority of trips, is a local-serving (LS) use which is considered to have a less than significant VMT impact.

**1.7 City Discussion of Alternatives**

After discussion, the City Council indicated it preferred the overall characteristics of the Lower Intensity Industrial Alternative (i.e., Alternative 2) but wanted more specific information about its development characteristics, layout, and potential environmental impacts. The following sections present the requested detailed information on Alternative 2.

**2.0 ALTERNATIVE 2 DESCRIPTION**

The DEIR described the Lower Intensity Industrial Alternative as having approximately 290,000 square feet of only high cube or e-commerce warehousing, not general warehousing, located in the central and western portions of the site. The DEIR stated this alternative would have 17% less floor area compared to 347,918 square feet for the proposed Project and would also have a small (2-acre) retail commercial center in the northeast corner of the site consisting of a gas station and one small restaurant pad.

The currently proposed Alternative 2 Site Plan would have 304,572 square feet of warehousing (which includes 20,000 square feet of office area) on 13.5 acres and, in the eastern portion of the site, 6,960 square feet of commercial uses on 2 acres (see **Figure 1a, Proposed Alternative 2 Site Plan, Figure 1b, Proposed Alternative 2 Commercial Site Details, and Figure 2, Proposed Alternative 2 Elevations**). The currently proposed warehouse building would contain 12.5 percent



less square feet than the original proposed Project (304,572 vs. 347,918 square feet). The 2-acre commercial center would potentially consist of two buildings with a total of 6,960 square feet of commercial space. The northern building is proposed to have a 2,010-square-foot fast-food restaurant while the southern building would have a 1,750-square-foot fast-food restaurant, 1,600 square feet of food and/or retail space, and 1,600 square feet of retail space (see **Figure 1b, Proposed Alternative 2 Commercial Site Details**).

It should be noted that the project applicant intends to process an application for a Conditional Use Permit (CUP) so that both of the fast-food restaurants would include single or double drive-throughs. Therefore, the air quality, greenhouse gas, noise, and traffic technical studies supporting this Additional Alternatives Analysis document include double drive-throughs for the two fast food restaurant uses to provide a “worst-case analysis” and so that additional studies would not be needed for the CUP application. The future CUP, when presented to the City Council, would be within the envelope of the worst-case analysis conducted in this Additional Alternatives Analysis.

The proposed alternative would be accessed via five (5) driveways. Two (2) driveways (northern and southern) on Indian Avenue, two (2) driveways (northern and southern) on Perris Boulevard, and one (1) driveway on Ramona Expressway (see **Figure 1a, Proposed Alternative 2 Site Plan**).

The northern driveway on Indian Avenue would be 26 feet wide and allow right-in/right-out passenger car access only to the industrial portion of the site. The southern, signalized driveway on Indian Avenue would be 45 feet wide and allow only truck access to the industrial portion of the site, with full turning movements.

The northern driveway on Perris Boulevard would be 26 feet wide and allow right-in/right-out passenger car access to the commercial portion of the site. The southern driveway on Perris Boulevard would also be 26 feet wide and allow right-in/right-out passenger car access to the industrial portion of the site. It should be noted that the southern driveway could also potentially be designed to provide access to the commercial portion of the site.

The proposed alternative also includes a right-in only driveway on Ramona Expressway providing access into just the commercial portion of the site; the existing Ramona Expressway right turn lane would need to be extended approximately 250 feet to the west to allow for additional deceleration (see **Figure 3, Proposed Right-In Only Driveway**).

Figure 1a, Proposed Alternative 2 Site Plan

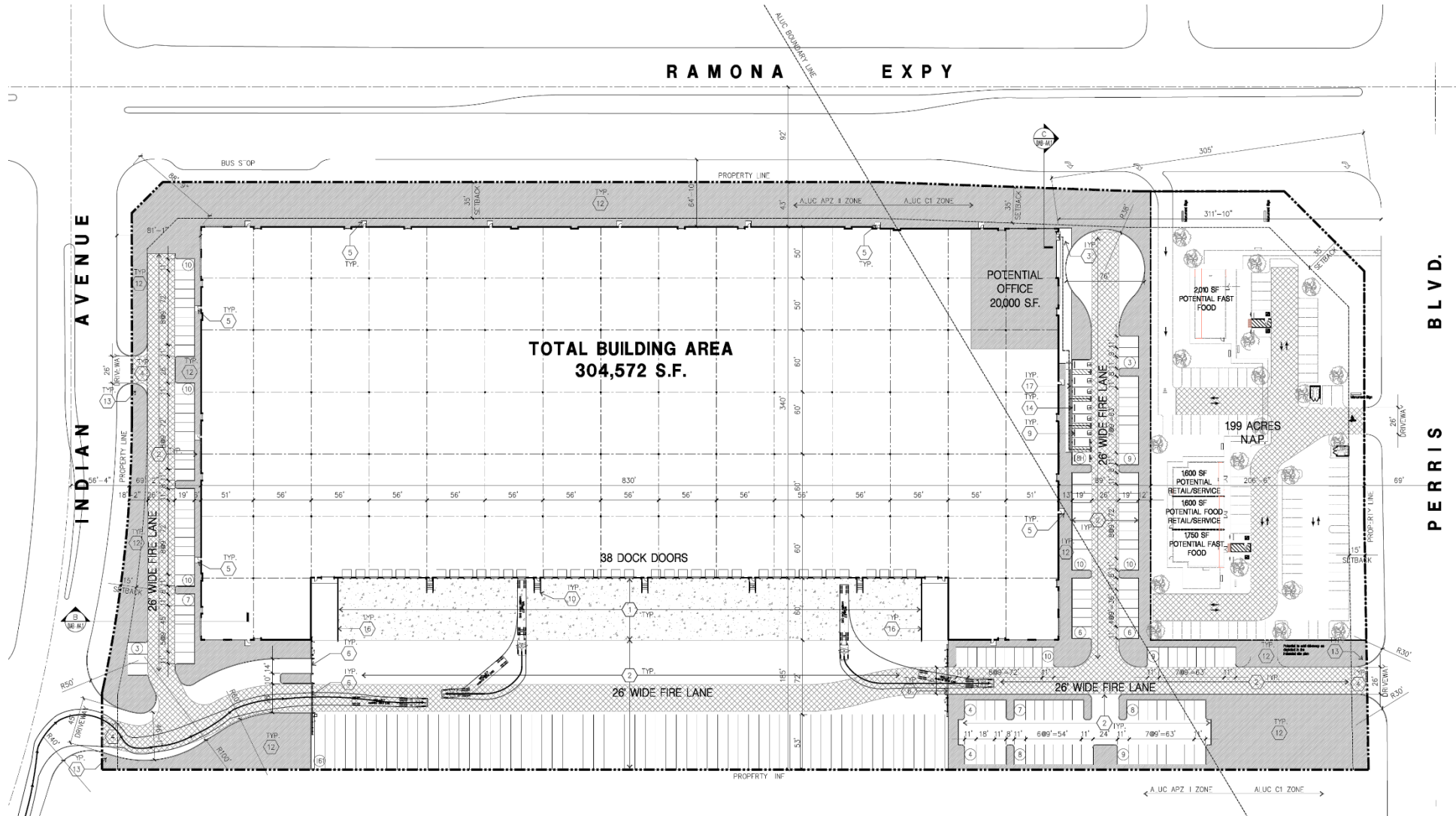


Figure 1b, Proposed Alternative 2 Commercial Site Details

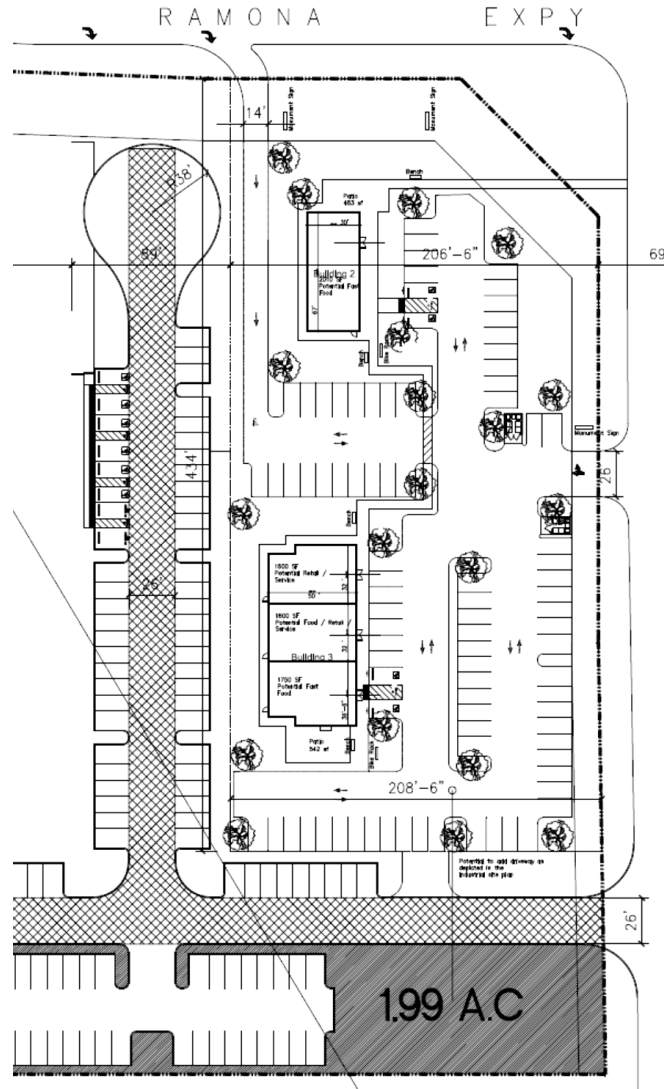
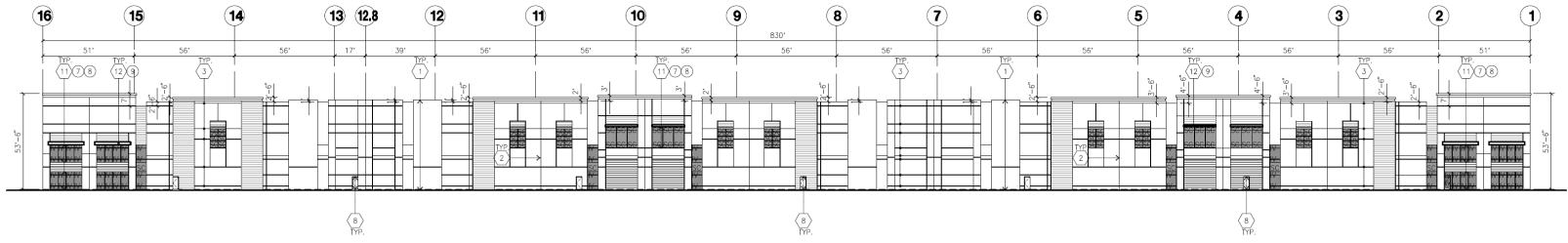
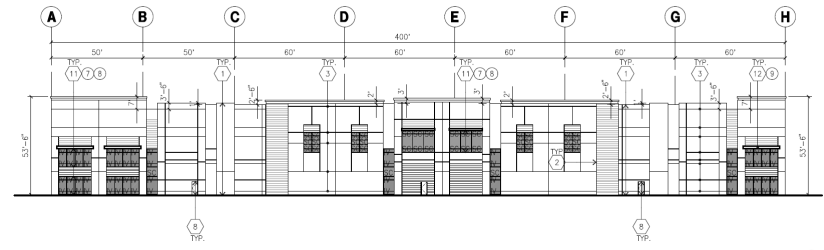


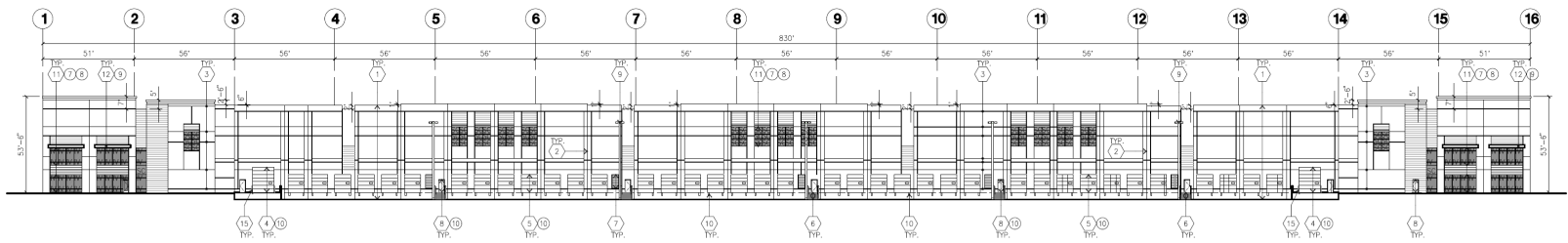
Figure 2, Alternative 2 Elevations



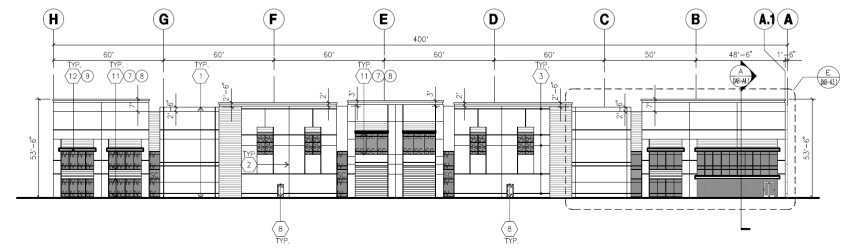
**NORTH ELEVATION**  
scale: 1"=30'-0"



**WEST ELEVATION**  
scale: 1"=30'-0"



**SOUTH ELEVATION**  
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**EAST ELEVATION**  
scale: 1"=30'-0"

Figure 2, Continued

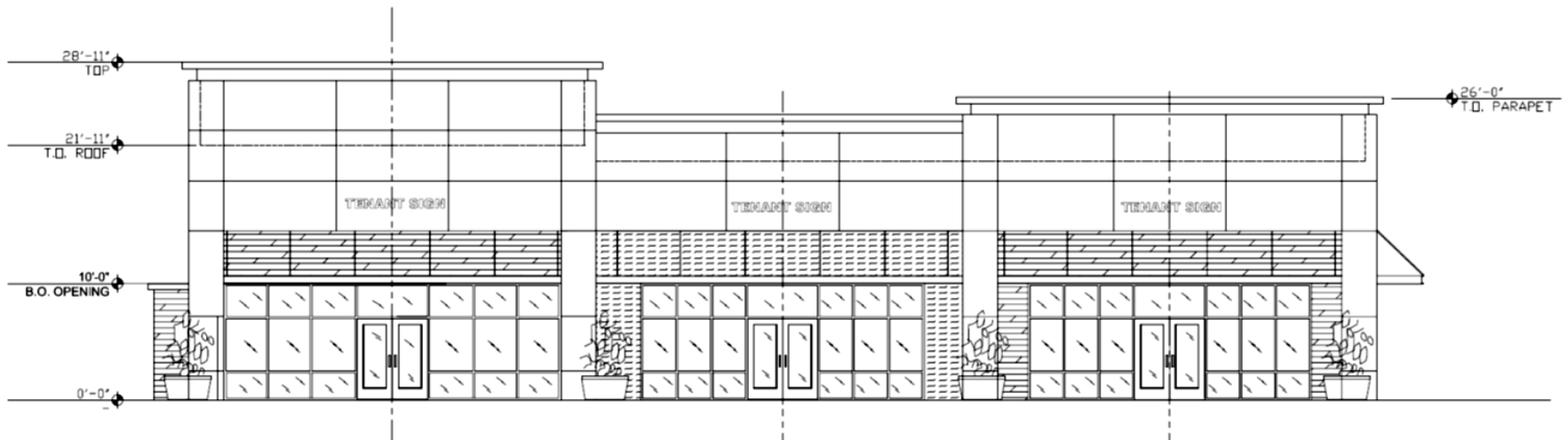
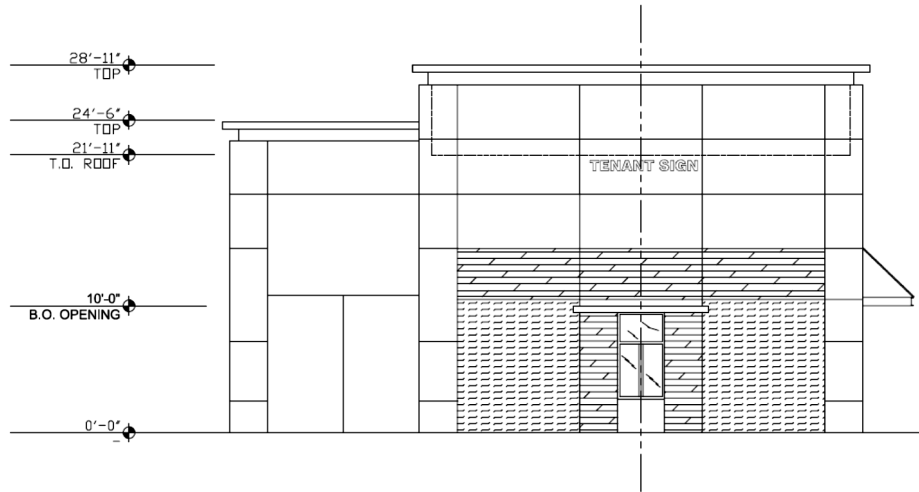
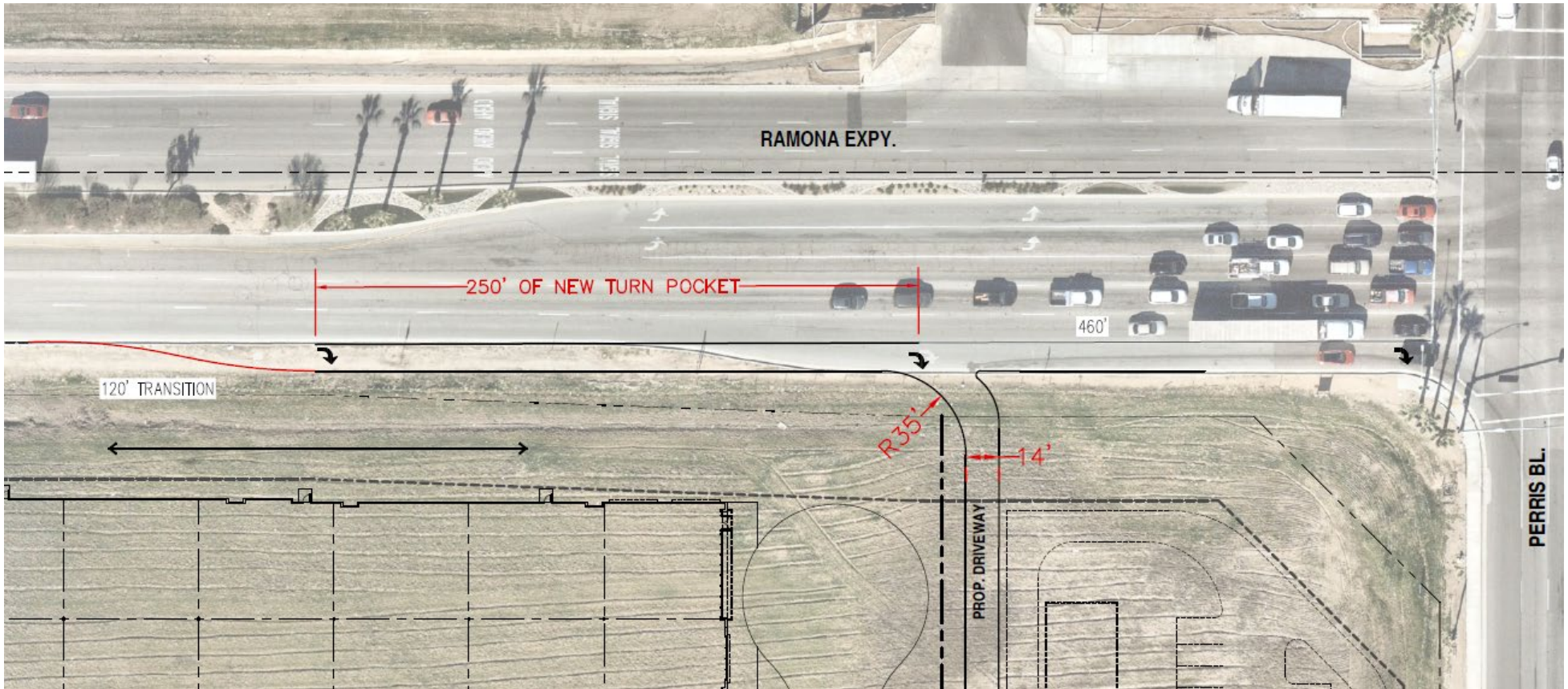


Figure 3, Proposed Right-In Only Driveway



### 3.0 IMPACT ANALYSIS

The following analysis provides the following: (1) summarizes the impacts of the original proposed PVCC SPA 13 project in the PVCC SPA 13 DEIR; (2) highlights the impacts of the Alternative 2 proposed in the PVCC SPA 13 DEIR; and (3) presents the impacts of the new proposed Alternative 2 Site Plan,

#### Aesthetics

Subsection V.1 of the Initial Study in the EIR Notice of Preparation (NOP) concluded the proposed Project warehouse would have less than significant impacts relative to aesthetics in this urban setting, so similarly the smaller warehouse and limited commercial uses under the Lower Intensity Industrial Alternative 2 would have similar less than significant aesthetic impacts.

This conclusion would also apply to the proposed Alternative 2 Site Plan which would introduce a large warehouse building onto the central and western portions of the site with a small 2-acre commercial center in the eastern portion of the site adjacent to Perris Boulevard. These two uses would be of a lower height and scale compared to the Project warehouse and would be considered urban in appearance. The new proposed Alternative 2 Site Plan described in Section 2 would have aesthetic impacts that are equivalent to those of the original EIR project and the DEIR Alternative 2 (i.e., less than significant with **EIR Mitigation Measure MM-AES-1** for lighting (see below).

#### **PVCC SPA 13 EIR Mitigation Measures**

**MM-AES-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.

#### Agriculture and Forestry Resources

The DEIR indicated development of the site under either the Project or Lower Intensity Industrial Alternative would remove any potential for agricultural use in the future, and the site has no potential for forest uses. Subsection V.2 of the Initial Study concluded the proposed Project would have no impacts on agricultural or forest resources.

Similarly, the current proposed Alternative 2 Site Plan would also have no impacts related to these resources.

#### Air Quality – Criteria Pollutants

DEIR Subsection 4.2 indicated the proposed Project, with 347,918 square feet of industrial warehouse space, would not exceed South Coast Air Quality Management District (SCAQMD) thresholds of significance, and so it would have less than significant impacts relative to short- and long-term air pollutant emissions and health risks from diesel truck emissions. Although the impacts of the Project would be less than significant, the Project is required to comply with all applicable PVCCSP EIR mitigation measures for air quality.

The DEIR also concluded the Lower Intensity Industrial Alternative would generate a similar amount of air pollutant emissions during construction since the Project and the Alternative both fully develop the site with warehousing and a gas station/restaurant under the Alternative. The DEIR indicated the Lower Intensity Industrial Alternative would generate incrementally more traffic

than the Project. The Project is expected to generate 492 total average daily trips (ADT) versus 1,802 ADT for the DEIR Alternative 2 (see previous **Table 1**). Therefore, the operational air quality impacts of this Alternative would be greater than the Project.

For the current proposed Alternative 2 Site Plan, a more detailed air quality assessment was prepared to give the City more specific information about the potential air quality impacts of the alternative relative to the information already provided in the DEIR. It should be noted that the Project applicant intends to process an application for Conditional Use Permits (CUPs) so that two of the fast-food restaurants would include single or double drive-throughs. Therefore, the calculations in the Air Quality Study (dated 5-16-2023) have taken this into account as a worst-case estimate for the proposed Alternative 2 Site Plan. Specifically, the study looked at 3,760 square feet of total fast food with drive through which is consistent with the applicant’s intent regarding CUPs. A comparison of the potential air quality impacts during operation is shown in **Table 2, Operational Air Quality Impact Comparison**. **Table 2** demonstrates that air pollutant emissions of the new Alternative 2 Site Plan would be greater than those estimated for the DEIR Project. This is consistent with the conclusions for Alternative 2 in the Draft EIR. However, the operational air quality impacts would still not exceed the SCAQMD thresholds for all criteria pollutants. Therefore, impacts would continue to be less than significant.

**Table 2  
Operational Air Quality Impact Comparison**

Total Maximum Daily Emissions	Emissions (lbs/day)				
	VOC	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Proposed Project in EIR	9.89	15.91	21.20	6.84	2.03
<b>Proposed Alternative 2 Site Plan</b>	<b>17.51</b>	<b>22.94</b>	<b>75.64</b>	<b>16.65</b>	<b>4.71</b>
SCAQMD Regional Threshold	55	55	550	150	55
<b>Threshold Exceeded by Alt. 2 Site Plan?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Sources: **Table 1** in this document, UC 2021, Table 4.2-7. **Appendix A – AQ, GHG, HRA, Energy Memo, Table 1**

As with the Project, the current proposed Alternative 2 Site Plan would also be required to implement DEIR **Standard Condition SC-AQ-1** and **PVCCSP EIR Mitigation Measures MM Air 2** through **MM Air 9, MM Air 11, MM Air 13, MM Air 19, and MM Air 20** to further reduce potential criteria pollutant emissions.

**PVCC SPA 13 EIR Standard Conditions and PVCCSP EIR Mitigation Measures**

**SC-AQ-1** The Project is required to comply with Rule 402 during construction, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

**PVCCSP MM Air 2** Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as flag person



during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.

**PVCCSP MM Air 3**

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

- Requiring the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain); Keeping disturbed/loose soil moist at all times;
- Requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered;
- Installation of wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip;
- Posting and enforcement of traffic speed limits of 15 miles per hour or less on all unpaved portions of the project site;
- Suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 miles per hour;

Appointment of a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM-10 generation;

- Sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks when sweeping streets to remove visible soil materials; and/or replacement of ground cover in disturbed areas as quickly as possible.

**PVCCSP MM Air 4**

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

**PVCCSP MM Air 5**

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

**PVCCSP MM Air 6**

The developer of each implementing development project shall require, by contract specifications, the use of alternative fueled off-road construction equipment, the use of construction equipment that

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

**PVCCSP MM Air 7**

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

**PVCCSP MM Air 8**

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

**PVCCSP MM Air 9**

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

**PVCCSP MM Air 11**

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

**PVCCSP MM Air 13**

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

for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP [On-road Heavy Duty Voucher Incentive Program], HVIP [Hybrid and Zero- Emission Truck and Bus Voucher Incentive Project], and SOON [Surplus Off-Road Opt-in for NO<sub>x</sub>] funding programs, as identified on SCAQMD's website (<http://www.aqmd.gov>). Tenants would be required to use those funds, if awarded.

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

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

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

### Air Quality – Health Risks

The DEIR concluded the proposed Project would not have significant health risks on nearby sensitive receptors due to the size of the building and associated truck traffic and the distance to the closest receptors. The DEIR calculated that the EIR Project would result in an increase of less than one additional cancer death per million persons over both the 25-year and 30-year exposure timeframes compared to a SCAQMD significance threshold of 10 additional cancer deaths per million persons. The DEIR concluded that Alternative 2 would not be expected to have significant health risks for nearby sensitive receptors since most of its trips are passenger vehicles generated by the local-serving gas station and retail use, while the warehouse, which generates truck traffic, is smaller than the Project and Section 4.2 of the DEIR determined the Project would not have significant health risks.

The potential health risk impacts associated with the current Alternative 2 Site Plan would not exceed the health risk values previously disclosed in the *Perris and Ramona Warehouse (DPR19-00012) Mobile Source Health Risk Assessment* (Urban Crossroads, Inc. 2021) due to the fact that the new Alternative 2 Site Plan includes a reduction of approximately 43,346 square feet of warehouse space and removal of the gasoline dispensing facility, which consequently would also result in fewer diesel truck trips associated with the Alternative 2 Site Plan and toxic air contaminants (TACs) associated with the dispensing of gasoline.

### Biological Resources

The biological resources report prepared for the Project and EIR determined the site contained no

significant biological resources either in terms of species or habitat. EIR Subsection 4.3 concluded that development of the Project will result in less than significant impacts to these resources with standard conditions and the applicable PVCCSP EIR mitigation measures.

Developing the site with retail commercial uses and a smaller warehouse under the new proposed Alternative 2 Site Plan would have similar and less than significant impacts related to biological resources compared to the proposed Project. Uses developed under the proposed Alternative 2 Site Plan would require the same standard conditions and mitigation relative to grading the site. The DEIR recommended **Standard Conditions SC-BIO-1** and **SC-BIO-2** along with **PVCCSP EIR mitigation measures MM Bio 1** for a nesting bird survey and **MM Bio 2** for a burrowing owl survey.

### **PVCC SPA 13 EIR Standard Conditions and PVCCSP EIR Mitigation Measures**

**SC-BIO-1** Prior to the issuance of grading permits, the developer shall pay the MSHCP fee.

**SC-BIO-2** Prior to the issuance of grading permits, the developer shall pay the Stephen's Kangaroo Rat Fee.

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

If site-preparation activities for an implementing project are proposed during the nesting/breeding season (February 1 to August 31), a pre-activity field survey shall be conducted by a qualified biologist prior to the issuance of grading permits for such project, to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not located within the implementing project

**PVCCSP MM Bio 2** Project-specific habitat assessments and focused surveys for burrowing owls would be conducted for implementing development or infrastructure projects within burrowing owl survey areas.

A pre-construction survey for resident burrowing owls would also be conducted by a qualified biologist within 30 days prior to commencement of grading and construction activities within those portions of implementing project sites containing suitable burrowing owl habitat and for those properties within an implementing project site where the biologist could not gain access.

If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre- construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity would be conducted in accordance with the current Burrowing Owl Instruction for the Western Riverside MSHCP.

If active nests are identified on an implementing project site during the pre- construction survey, the nests shall be avoided, or the owls actively or passively relocated. To adequately avoid active nests, no grading or

heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31), and 160 feet during the non-breeding season.

### Cultural Resources

The cultural resources assessment report prepared for the Project and EIR determined the Project site contained no significant historical or archaeological resources although grading could reveal unknown buried artifacts or other resources. DEIR Subsection 4.4 concluded that development of the Project would result in less than significant impacts on these resources with implementation of the recommended mitigation. Developing the site with retail commercial uses and a smaller warehouse would also have similar less than significant impacts related to cultural resources since the entire site would be disturbed under either the Project or Alternative 2. Uses developed under the proposed Alternative 2 Site Plan would require the same mitigation relative to grading the site to protect unexpected resources. Impacts would be less than significant with implementation of these mitigation measures. The EIR recommended Project **Mitigation Measures MM-CR-1** and **MM-CR-2** to help protect unanticipated discovery of cultural resources, and the new Alternative 2 Site Plan would be subject to these measures as well.

### **PVCC SPA 13 EIR Mitigation Measures**

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

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

In the event that archaeological resources are discovered at the Project site or within the off-site Project improvement areas, the handling of the discovered resource(s) will differ, depending on the nature of the find. Consistent with California Public Resources Code Section 21083.2(b) and Assembly Bill 52 (Chapter 532, Statutes of 2014), avoidance shall be the preferred method of preservation for Native American/tribal cultural/archaeological resources. However, it is understood that all artifacts, with the exception of human remains and related grave goods or sacred/ceremonial/religious objects, belong to the property owner. 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 and the Soboba Band of Luiseño Indians and the Pechanga Band of Luiseño Indians. A designated Native American representative from either the Soboba Band of Luiseño Indians or the Pechanga Band of Luiseño Indians shall be retained to assist the Project archaeologist in the significance determination of the Native American as deemed possible. The designated Luiseño tribal representative will be given ample time to examine the find. The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA and shall consider the religious beliefs, customs, and practices of the Luiseño tribe. If the find is determined to be of sacred or religious value, the Luiseño tribal representative will work with the City and consulting archaeologist to protect the resource in accordance with tribal requirements. All analysis will be undertaken in a manner that avoids destruction or other adverse impacts.

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

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 representative, determines that monitoring is no longer warranted, monitoring activities can be discontinued following notification to the City of Perris Planning Division.

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

**MM-CR-2**

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

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

### Energy

The energy report prepared for the Project and EIR determined the Project would increase consumption of electricity and natural gas for space and water heating, air conditioning, lighting, and operation of miscellaneous equipment and appliances. It would also consume fossil fuels for car and truck trips to and from the proposed warehouse. DEIR Subsection 4.5 determined the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. In addition, the proposed Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Any impacts would be further reduced with implementation of the standard conditions and PVCCSP EIR mitigation measures from the air quality section.

The DEIR indicated the Lower Intensity Industrial Alternative No. 2 would also utilize energy resources, mainly in the form of electricity although some natural gas may be used by the restaurant for cooking. Due to the similar intensity of overall site use, the Lower Intensity Industrial Alternative would be expected to use an equivalent amount of energy during operations compared to the proposed Project. The Alternative would also likely use a similar amount of energy during construction. Buildings constructed as part of this Alternative would have to comply with state energy conservation requirements similar to those for the proposed Project.

To better evaluate the potential energy impacts of the proposed Alternative 2 Site Plan, a detailed analysis was prepared by Urban Crossroads dated 11-9-2022. Construction associated with the new Alternative 2 Site Plan would not result in energy demands that would be substantially different than the emissions identified in the *Perris and Ramona Warehouse (DPR19- 00012) Air Quality Analysis* (Urban Crossroads, Inc. 2021) due to a similar amount of land disturbed and equivalent amounts of development (i.e., smaller warehouse building but new commercial uses). **Table 3, Operational Energy Use Comparison** compares the estimated operational energy use of the EIR Project to that of the new Alternative 2 Site Plan.

**Table 3**  
**Operational Energy Use Comparison**

<b>Energy Source</b>	<b>EIR Project</b>	<b>New Alt. 2 Site Plan</b>	<b>Significant Impact?</b>
Vehicle VMT	2,647,522	6,174,509	No
Vehicle Fuel Consumption	175,471 gallons	299,966 gallons	No
Electrical Consumption	922,964 kWh/yr	1,019,943 kWh/yr	No
Natural Gas Consumption	699,315 kBtu/yr	2,077,166 kBtu/ry	No

Sources: UC 2021 AQ Study, Table 4-13. **Appendix A** – AQ, GHG, HRA, Energy Memo, Tables 3 and 4

Based on available information, the potential energy impacts of the proposed warehousing and commercial uses under the proposed Alternative 2 Site Plan would be similar to those of the proposed Project and Lower Intensity Industrial Alternative, but all three would be less than significant. Any impacts would be further reduced with implementation of the standard conditions and some of the PVCCSP EIR mitigation measures recommended for criteria air pollutant impacts outlined in the Air Quality section (DEIR **Standard Condition SC-AQ-1** and **PVCCSP EIR mitigation measures MM Air 4, MM Air 11, MM Air 14, MM Air 19, and MM Air 20** – see above).

### Geology and Soils

Subsection V.7 of the Initial Study concluded that development of the proposed Project would be subject to a number of geologic, seismic, and soil constraints. However, the Initial Study indicated development of the Project would have less than significant impacts related to geology and soils with implementation of standard conditions and recommended mitigation.

Development of the Lower Intensity Industrial Alternative would require grading of the entire site as well and its impacts would likely be less than significant similar to the proposed Project with implementation of standard conditions and recommended mitigation.

The current proposed Alternative 2 Site Plan would have similar impacts to geology and soils compared to the EIR Project and the DEIR Alternative 2 as they all evaluate development of the same site with the same geotechnical conditions.

The Project site is mapped as a “High B” sensitivity area, denoting a high sensitivity for paleontological resources. Areas classified as high sensitivity may contain buried paleontological deposits at or below 4 feet of depth and may be impacted during construction, so mitigation was recommended. Similar mitigation would also be required to develop the Lower Intensity Industrial Alternative. Therefore, both the Project and the proposed Alternative 2 would have less than significant impacts to paleontological resources with implementation of **Standard Conditions SC-GEO-1, SC-GEO-2, SC-HYD-1 and SC-HYD-2** (under Hydrology and Water Quality below), **PVCCSP EIR mitigation measure MM Air 3** (under Air Quality above), and Project **Mitigation Measure MM-GEO-1**.

### **PVCC SPA 13 EIR Standard Conditions and Mitigation Measures**

**SC-GEO-1** Project design shall be subject to the seismic design criteria of the 2019 edition of the California Building Code (CBC), adopted December 10, 2019, by the City of Perris as Ordinance No. 1387.

**SC-GEO-2** The Project shall comply with the recommendations listed in the Geo Investigation as it pertains to impacts arising from unstable soils (seismic ground shaking, on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse), and/or



expansive soils.

**MM-GEO-1** Prior to the issuance of grading permits, the Project proponent/developer shall submit to and receive approval from the City, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The PRIMMP shall include the provision for a qualified professional paleontologist (or his or her trained paleontological representative) to be on-site for any Project-related excavations that exceed three (3) feet below the pre-grade surface. Selection of the paleontologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the Project site or within the off-site Project improvement areas until the paleontologist has been approved by the City.

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

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

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

### Greenhouse Gas Emissions (GHG)

DEIR Subsection 4.6 indicates the Project would produce both short-term GHG emissions during construction and long-term GHG emissions during operation. However, it concluded with Project impacts would be less than significant.

The Lower Intensity Industrial Alternative would generate incrementally more traffic and thus slightly more GHG emissions than the Project. The Project is expected to generate 492 total ADT versus 1,802 ADT for the Alternative (see previous **Table 1**). Therefore, the operational GHG emissions of the Lower Intensity Industrial Alternative would be slightly higher than those of the Project. The DEIR indicated the proposed Project as well as the Lower Intensity Industrial Alternative would be required to comply with the GHG reduction strategies contained in the City's Climate Action Plan as well as the air quality mitigation measures which also help reduce GHG emissions.

To better evaluate the potential greenhouse gas emission impacts of the proposed Alternative 2 Site Plan, a detailed analysis was prepared by Urban Crossroads dated 11-9-2022 and updated 5-16-2023. Table 4 compares the estimated energy use of the EIR proposed Project to that of the new Alternative 2 Site Plan. It should be noted that the Project applicant intends to process an application for Conditional Use Permits so that both of the fast-food restaurants would include single or double drive-throughs. Therefore, the calculations in the Greenhouse Gas Emissions

portion of the Air Quality Study take this into account as a worst-case estimate. Specifically, the study looked at 3,760 square feet of total fast food with drive through which is consistent with the applicant’s intent regarding CUPs. As shown in **Table 4, Operational GHG Emissions Comparison** the supplemental analysis indicates the GHG emissions of the EIR Project and the new Alternative 2 Site Plan are similar, and all are less than the SCAQMD threshold of significance. As recommended for the Project and Alternative 2 in the EIR, the new Alternative 2 Site Plan would implement the applicable PVCCSP EIR mitigation measures recommended for criteria air pollutant impacts outlined in the air quality section (**PVCCSP EIR mitigation measures MM Air 2, MM Air 4, MM Air 7, MM Air 11, MM Air 13, MM Air 14, MM Air 19, and MM Air 20** – under Air Quality above).

**Table 4  
Operational GHG Emissions Comparison**

<b>GHG Source</b>	<b>Total Annual GHG Emissions (MTCO<sub>2</sub>e)</b>
Proposed Project in EIR	2,539.85
New Alternative 2 Site Plan	3,744.41
SCAQMD Threshold	10,000.00
New Alt. 2 Site Plan Exceeds Threshold?	No
New Alt. 2 Site Plan Significantly Different Than EIR Project?	No

Sources: **Table 1** this document, PVCC SPA13 EIR, Table 4.6-6. **Appendix A** – AQ, GHG, HRA, Energy Memo, Table 2.

Hazards and Hazardous Materials

Subsection V.9 of the Initial Study indicated that construction and regular operation of the proposed light-industrial facility would not result in significant impacts involving the use, storage, transport or disposal of hazardous wastes and substances. It concluded use of common household hazardous materials and their disposal does not present a substantial health risk to the community.

Development of a gas station and restaurant plus a smaller warehouse on the site would also not result in significant impacts related to hazardous materials due to the anticipated uses of the site with these facilities. Therefore, less than significant impacts related hazardous materials from the Lower Intensity Industrial Alternative would also be expected.

DEIR Subsection 4.8 stated the proposed Project was consistent with the March ALUCP and related Air Force Safety Zone restrictions on the site. Therefore, potential airport hazards to the Project are less than significant.

The Lower Intensity Industrial Alternative was developed to be consistent with the March ALUCP and Air Force Safety Zone land use restrictions. Therefore, potential airport hazards to the Lower Intensity Industrial Alternative are also less than significant.

The new Alternative 2 Site Plan is similar to the DEIR Alternative 2 except that the gas station was removed and slightly more retail commercial square footage is provided. The new Alternative 2 Site Plan would have incrementally less impacts related to hazardous materials due to the elimination of the proposed gas station. The remainder of the hazards impacts would be equivalent to those identified in the DEIR. The DEIR also recommended implementation of Project **Mitigation Measures MM-HAZ-1** for possible pesticides, **MM-HAZ-2** in buried hazards were found, and **MM-HAZ-3** to implement the many recommendations by the 2023 Riverside County Airport Land Use Commission (RCALUC). With implementation of these measures along with **PVCCSP EIR mitigation measure MM Air 2** (under Air Quality above), impacts of the new Alternative 2 Site

Plan would remain at less than significant levels as outlined in the DEIR.

### **PVCC SPA 13 EIR Mitigation Measures**

**MM-HAZ-1 Pesticide Presence.** Prior to any ground disturbance activities, the Project applicant shall coordinate the sampling and laboratory testing of onsite soils for contamination by past agricultural chemicals (e.g., pesticides, herbicides, rodenticides, heavy metals, etc.) with the County Department of Environmental Health Services (DEH). If requested, the applicant shall submit a workplan to DEH for review and approval prior to the completion of grading. If any past agricultural chemicals are found in levels that exceed applicable health standards, a qualified contractor shall be retained to remove and properly dispose of such materials. Any work conducted shall be in compliance with DEH guidelines as the appropriate oversight agency. If sampling and laboratory testing are performed, a final report shall be prepared and submitted to DEH for review and approval prior to issuance of a certificate of occupancy.

**MM-HAZ-2 Buried Hazards.** If any former fuel tanks or other potentially hazardous materials are found during grading or any ground disturbing activities, work in that area shall be halted within 100 feet of the find and a qualified environmental contractor shall be retained. The contractor shall assess the risk or hazard level of the material(s) and identify the most appropriate method of remediation. This work shall occur in coordination with and to the satisfaction of the County Department of Environmental Health Services (DEH).

**MM-HAZ-3 ALUC Consistency.** Prior to issuance of a certificate of occupancy, the applicant shall demonstrate the Project has complied with the following conditions issued by the Riverside County Airport Land Use Commission (ALUC) at its January 12, 2023, meeting relative to March Air Reserve Base/Inland Port Airport (MARB/IPA):

1. Any new outdoor lighting that is installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.
2. The following uses/activities are not included in the proposed project and shall be prohibited at this site:

(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 or circling climb following takeoff or toward an aircraft engaged in a straight or circling final approach toward a landing at an airport, other than a DoD or 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 or circling climb following takeoff or towards an aircraft engaged in a straight or circling 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. (Such uses include landscaping utilizing water features,

aquaculture, production of cereal grains, sunflower, and row crops, composting operations, wastewater management facilities, artificial marshes, trash transfer stations that are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators.)

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

(e) Children's schools, day care centers, libraries, hospitals, skilled nursing and care facilities, congregate care facilities, hotels/motels, places of assembly (including, but not limited to places of worship and theaters), buildings with more than 2 aboveground habitable floors, hazardous materials and critical community infrastructure facilities.

(f) Highly noise-sensitive outdoor nonresidential uses. Examples of noise-sensitive outdoor nonresidential uses that are prohibited include, but are not limited to, major spectator-oriented sports stadiums, amphitheaters, concert halls and drive-in theaters.

(g) Any other uses not permitted in (Accident Potential Zone I/ Accident Potential Zone II) pursuant to DoDI 4165.57 Appx.2, Tbl.1.

(h) Other Hazards to Flight.

3. Prior to issuance of building permits, the landowner shall convey an avigation easement to the March Inland Port Airport Authority or its successor in interest, or provide evidence that such easement has been previously conveyed. The Airport Authority may waive this requirement in the event that the Authority determines that pre-existing avigation easements dedicated to the United States of America are sufficient to address its needs. Contact the March Joint Powers Authority at (951) 656-7000 for additional information.

4. The attached notice shall be given to all prospective purchasers of the property and tenants of the buildings.

5. Any proposed detention basins or facilities shall be designed and maintained to provide for a maximum 48-hour detention period following the design storm, and remain totally dry between rainfalls. Vegetation in and around the detention basins that would provide food or cover for birds would be incompatible with airport operations and shall not be utilized in project landscaping. Trees shall be spaced so as to prevent large expanses of contiguous canopy, when mature. Landscaping in and around the detention basin(s) shall not include trees or shrubs that produce seeds, fruits, or berries.

Landscaping in the detention basin, if not rip-rap, should be in accordance with the guidance provided in ALUC "LANDSCAPING NEAR AIRPORTS" brochure, and the "AIRPORTS, WILDLIFE AND STORMWATER MANAGEMENT" brochure available at RCALUC.ORG which list acceptable plants from Riverside County Landscaping Guide or other alternative landscaping as may be recommended by a qualified wildlife hazard biologist.

A notice sign, in a form similar to that attached hereto, shall be permanently affixed to the stormwater basin with the following language: "There is an airport nearby. This stormwater basin is designed to hold stormwater for only 48 hours and not attract birds. Proper maintenance is necessary to avoid bird strikes". The sign will also include the name, telephone number or other contact information of the person or entity responsible to monitor the stormwater basin.

6. March Air Reserve Base must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result. Sources of electromagnetic radiation include radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc.

7. Noise attenuation measures shall be incorporated into the design of the office, retail, and restaurant areas, to the extent such measures are necessary to ensure that interior noise levels from aircraft operations are at or below 45 CNEL.

8. The project does not propose rooftop solar panels at this time. However, if the project were to propose solar rooftop panels in the future, the applicant/developer shall prepare a solar glare study that analyzes glare impacts, and this study shall be reviewed by the Airport Land Use Commission and March Air Reserve Base.

9. This project has been evaluated as consisting of (within Zone B1-APZ-II) 274,150 square feet of e-commerce warehouse area (no office area proposed) and (within Zone C1) a portion of the main industrial building including 10,422 square feet of warehouse area, 10,000 square feet of first floor office area, and 10,000 square feet of second floor office mezzanine area; a standalone 2,010 square foot restaurant building with an 8 car stack drive-thru which includes 1,206 square feet of dining area and 804 square feet of kitchen area; a 4,950 square foot mixed retail/restaurant building with 14 car stack drive-thru which includes: 1,050 square feet of dining area and 700 square feet of kitchen area (fast food restaurant), 960 square feet of dining area and 640 square feet of kitchen area (inline restaurant), and 1,600 square feet of retail area. Any increase in building area, change in use to any higher intensity use, change in building location, or modification of the tentative parcel map lot lines and areas will require an amended review to evaluate consistency with the ALUCP compatibility criteria, at the discretion of the ALUC Director.

10. Zoned fire sprinkler systems shall be required throughout the industrial building.

11. Review and the necessary clearances from the FAA OES is required for all temporary construction cranes.

### Hydrology and Water Quality

The Project has the potential to generate new pollutants from the proposed urban/suburban environment that can degrade water quality. However, DEIR Subsection 4.7 concludes that the Project would result in less than significant impacts to hydrology or water quality with implementation of its planned design, standard conditions, and proposed offsite improvements to alleviate localized flooding.

The Lower Intensity Industrial Alternative would also develop the entire Project site and would also be required to design its development so that offsite downstream runoff would not increase, and potential urban pollutants would not reach downstream impacted water bodies. Since the site is over a half-acre, any development would be required to comply with established regional, state, and federal water quality requirements as appropriate. With this compliance, the proposed Project and the Lower Intensity Industrial Alternative would have less than significant impacts to hydrology and water quality.

The new proposed Alternative 2 Site Plan is similar in overall design to EIR Alternative 2. To demonstrate the water quality impacts of the new Site Plan are equivalent to those of the EIR Project and Alternative, the Project-specific Water Quality Management Plan (WQMP) has been modified to address eventually having two separate parcels for the two different onsite uses (warehouse and commercial) and to show how water quality would be managed since the two parcels would be under different ownership/management. Each parcel/use area would have its own water quality basin and related improvements as demonstrated in the revised WQMP (UEG 2023, **Appendix E**).

The City's Standard Conditions of Approval require the new Alternative 2 Site Plan to provide a Stormwater Pollution Prevention Plan (SWPPP) (**Standard Condition SC-HYD-1**), which will help protect short-term onsite and downstream water quality during construction, and a Water Quality Management Plan (**SC-HYD-2**) which includes Best Management Practices (BMPs) to protect onsite and downstream water quality during Project operation over the long-term. In addition, **SC-HYD-3** requires all onsite wastewater to be discharged to the local sewer system, **SC-HYD-4** requires City approval of an onsite drainage plan, and **SC-HYD-5** requires payment of impact fees to fund needed storm drain facilities. These three standard conditions will also help protect long-term water quality both onsite and downstream of the Project site.

### PVCC SPA 13 EIR Standard Conditions

- SC-HYD-1** SWPPP. Erosion and siltation reduction measure BMPs contained in the required SWPPP will be implemented during construction. At the completion of construction, the Project will consist of impervious surfaces, landscaped planters, and post-construction BMPs.
- SC-HYD-2** WQMP. The Project proponent is required to submit a Water Quality Management Plan (WQMP) for review and approval. The WQMP identifies post-construction BMPs in addressing increases in impervious surfaces, methods to decrease incremental increases in off-site stormwater flows, and methods for decreasing pollutant loading in off-site discharges as required by the applicable NPDES requirements.
- SC-HYD-3** Wastewater. All wastewater associated with the Project's interior plumbing systems will be discharged into the local sewer system for treatment at the regional wastewater treatment plant.
- SC-HYD-4** Site Drainage Plan. A site drainage plan is required by the City of Perris and will be reviewed by the City Engineering Department. The final grading and drainage plan will be approved by the City Engineering Department during plan check review.
- SC-HYD-5** Storm Drainage Facilities. The Project applicant shall pay Development Impact Fees (DIF) for nonresidential development prior to the issuance of a building permit.

### Land Use and Planning

The proposed Project would not represent a change to the City's General Plan Land Use Plan and the City's Zoning Map, but it would represent a change to the PVCCSP. Based on the data and analysis presented in DEIR Subsection 4.8, implementation of the proposed Project will not cause significant land use or planning impacts in the City of Perris.

The Lower Intensity Industrial Alternative is also consistent with existing City General Plan Land Use plan and the City's Zoning Map but not the PVCCSP, similar to the proposed Project. Therefore, this alternative would have less than significant land use or planning impacts similar to those of the proposed Project.

The new Alternative 2 Site Plan is a practical form of the DEIR Alternative 2 other than it has more commercial square footage due to removal of the gas station. It would have the same land use and planning impacts of the DEIR Alternative 2 which in turn had slightly reduced impacts compared to the EIR Project, but all less than significant and no mitigation is required.

### Mineral Resources

As described in Subsection V.12 of the Initial Study, the Project site and surrounding area do not contain any existing mineral development or any identified potential for mineral resource development. Therefore, the Project has no potential to cause any unavoidable adverse impact to mineral resources or values in Riverside County. Similar to the Project, development of the site under Lower Intensity Industrial Alternative 2 would also have no impacts on mineral resources as they are no present in the Project area.

The current Alternative 2 Site Plan would have similar impacts to mineral resources compared to the EIR Project and the DEIR Alternative 2 as they all evaluate development of the same site with the same geologic (i.e., mineral resource) conditions.

### Noise

DEIR Subsection 4.9 concluded that Project construction will not result in exposure of persons to or generation of noise levels in excess of standards established in the City's General Plan, as implemented by the City's Noise Ordinance with implementation of PVCCSP EIR mitigation during grading and construction. The increase in noise levels during operation would be less than significant. As vibration levels would generally not be perceptible to the average person and would not result in cosmetic nor structural damage to buildings, EIR Subsection 4.9 also concluded vibration impacts from Project construction would be less than significant.

Development of the site under the Lower Intensity Industrial would have noise impacts on nearby land uses similar to those of the proposed Project. Customers coming and going from the gas station/restaurant uses and the smaller warehouse would generate 1,802 daily vehicular trips compared to 492 trips for the Project. Therefore, this Alternative would result in incrementally higher but still less than significant operational noise impacts compared to the Project. Development of this alternative may require application of PVCCSP EIR construction mitigation similar to that for the proposed Project, but any operational noise mitigation would depend on the results of a site-specific noise study if this alternative was approved. With PVCCSP EIR mitigation, the Lower Intensity Industrial Alternative and the proposed Project would have less than noise impacts on the surrounding community.

Development of the site under the proposed Alternative 2 Site Plan would have noise impacts on

nearby land uses similar to those of the proposed Project. Customers coming and going from the restaurant and retail uses and the smaller warehouse of the Alternative 2 Site Plan would generate 1,594 daily vehicular trips compared to 492 trips for the Project.

To better evaluate the potential noise impacts of the proposed Alternative 2 Site Plan, a detailed analysis was prepared by Urban Crossroads dated 11-9-2022. The new analysis was similar in data and methodology used in the noise study for the EIR Project and used as the basis for evaluating the DEIR Alternative 2. The revised noise study used the same overall development site, sensitive receptor information, and City standards as the original study but used updated development uses and areas, trip generation, and other traffic information prepared specifically for this new Alternative 2 Site Plan. It should be noted that the Project applicant intends to process an application for Conditional Use Permits so that both of the fast-food restaurants would include single or double drive-throughs. Therefore, the calculations in the Noise Study have taken this into account as a worst-case estimate. Specifically, the study looked at 3,760 square feet of total fast food with drive through which is consistent with the applicant’s intent regarding CUPs. **Table 5, Operational Noise Level Compliance Comparison** compares the estimated noise impacts of the EIR proposed Project to that of the new Alternative 2 Site Plan. **Table 5** demonstrates the new Alternative 2 Site Plan would have equivalent noise impacts (i.e., less than significant) compared to the EIR Project or DEIR Alternative 2.

**Table 5  
Operational Noise Level Compliance Comparison**

Receiver Location <sup>1</sup>	Project Operational Noise Levels (dBA Lmax) <sup>2</sup>		Exterior Noise Level Standards (dBA Lmax) <sup>3</sup>		Noise Level Standards Exceeded? <sup>4</sup>	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
<b>EIR Proposed Project Impacts</b>						
R1	56.1	55.1	80	60	No	No
R2	56.8	55.8	80	60	No	No
R3	47.7	46.7	80	60	No	No
R4	57.1	56.1	80	60	No	No
<b>New Alternative 2 Site Plan Impacts</b>						
R1	40.5	40.2	80	60	No	No
R2	44.1	42.7	80	60	No	No
R3	51.6	50.6	80	60	No	No
R4	54.7	54.2	80	60	No	No

<sup>1</sup> See EIR Figure 4.9-2 for the receiver locations. Sources: **Appendix B** - Noise Memo, Table 2.  
<sup>2</sup> Proposed Project operational noise level calculations are included in Appendix B of the Noise Memo.  
<sup>3</sup> City of Perris Municipal Code, Section 7.34.040 (Appendix A of the Noise Memo).  
<sup>4</sup> Do the estimated Project operational noise source activities exceed the noise level standards? "Daytime" = 7:01 a.m. to 10:00 p.m.; "Nighttime" = 10:01 p.m. to 7:00 a.m.

The revised noise analysis demonstrates that the operational noise levels associated with the new Alternative 2 Site Plan satisfy the City of Perris exterior noise level standards at all nearby receiver locations. Therefore, its noise impacts are considered less than significant relative to the offsite noise-sensitive receiver locations. However, the EIR indicated the Project and alternatives would implement **PVCCSP EIR mitigation measures MM Noise 1** through **MM Noise 4** to help reduce construction noise to the greatest extent feasible. Therefore, the new Alternative 2 Site Plan will also implement these measures.



**PVCCSP EIR Mitigation Measures**

- PVCCSP MM Noise 1** During all project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturer standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site.
- PVCCSP MM Noise 2** During all construction, stationary construction equipment, stockpiling and vehicle staging areas will be placed a minimum of 446 feet from the closest sensitive receptor.
- PVCCSP MM Noise 3** No combustion-powered equipment, such as pumps or generators, shall be allowed to operate within 446 feet of any occupied residence unless the equipment is surrounded by a noise protection barrier.
- PVCCSP MM Noise 4** Construction contractors of implementing development projects shall limit haul truck deliveries to the same hours specified for construction equipment. To the extent feasible, haul routes shall not pass sensitive land uses or residential dwellings.

Population and Housing

The proposed Project includes a Specific Plan Amendment to change the PVCCSP land use designation of the Project site from Commercial (C) to Light Industrial (LI). This is not considered a substantial change because the new LI designation is a less intensive land use compared to the existing Commercial designation, would not result in the construction of new homes or the addition of new residents to the City. Initial Study Subsection V.14 concluded the Project would not cause significant impacts relative to the existing population and housing forecasts for the City of Perris and Riverside County.

Since the Lower Intensity Industrial Alternative and the new proposed Alternative 2 Site Plan also propose no residential uses for the site, they would also have less than significant impacts on population and housing resources.

Public Services

The Project applicant proposes to change the existing specific plan land use designation for the Project site from Commercial (C) to Light Industrial (LI). However, the proposed change in land use will not have a substantial impact on public services beyond those previously identified in the PVCCSP EIR. Subsection V.15 of the Initial Study determined that all potential impacts of the Project on public services, including fire protection, police, schools, solid waste, and other governmental services, would be less than significant with implementation of standard conditions such as payment of development impact fees and installation of adequate water system (for fire protection).

Due to the similar intensity of land uses, the Lower Intensity Industrial Alternative would be expected to result in less than significant impacts on fire protection, emergency response, police, parks, or school services with standard conditions. Impacts of the DEIR Alternative would be equivalent to those of the Project due to the similar intensity of uses.

The new proposed Alternative 2 Site Plan is very similar to the Lower Intensity Industrial Alternative 2 from the DEIR; the new plan eliminates the gas station and increases the retail commercial area compared to the DEIR alternative. These minor changes would have no demonstrable effect on public service impacts of the proposed Alternative 2 Site Plan. In addition, the City would require implementation of **Standard Conditions SC-PS-1** through **SC-PS-3** to pay development and school impacts fees and comply with the City Fire Code. Impacts would be less than significant with this regulatory compliance and no mitigation is required.

### **PVCC SPA 13 EIR Standard Conditions**

- SC-PS-1** Development Impact Fee (DIF). The Project applicant shall pay Development Impact Fees; DIF for nonresidential development shall be paid prior to the issuance of a building permit.
- SC-PS-2** Municipal Code Section 20.01.010 (Fire Code). The Project shall comply with applicable version of Section 20.01.010 of the Municipal Code at the time of permit issuance.
- SC-PS-3** Prior to the issuance of a building permit for nonresidential development, the Project applicant shall pay the most recent developer fee to the Val Verde Unified School District applicable at the time of building permit issuance.

### Recreation

Subsection V.16 of the Initial Study concluded any indirect impacts to parks and other recreational facilities caused by the proposed Project would be reduced to less than significant levels with payment of applicable Park and Recreation Facilities impact fees as outlined in **Standard Condition SC-REC-1**.

Similar to the proposed Project, development of the DEIR Lower Intensity Industrial Alternative as well as the new Alternative 2 Site Plan would also result in no direct and only possible indirect impacts to recreation resources since they propose only non-residential uses (warehousing and commercial with a gas station in the DEIR Alternative 2).

### **PVCC SPA 13 EIR Standard Conditions**

- SC-REC-1** The Project applicant shall pay Development Impact Fees (DIF) for nonresidential development prior to the issuance of a building permit.

### Transportation

As noted in the City Guidelines, “projects that generate less than 500 ADT would not cause a substantial increase in the total citywide or regional vehicle miles traveled (VMT) and are therefore presumed to have a less than significant impact on VMT.” DEIR Subsection 4.10 determined that the proposed Project was anticipated to generate 492 trip-ends per day which is below the 500 ADT threshold established by the City. Therefore, the proposed Project meets the Daily Trip Screening criteria outlined in the City Guidelines and will have a less than significant VMT impact.

The EIR Project was expected to generate 492 total ADT versus 1,802 ADT for the Lower Intensity Industrial Alternative. Since the operational traffic of the Alternative exceeds the City’s 500 ADT threshold, an additional VMT analysis was required. However, most of the traffic from this alternative is generated by the gas station and retail use while the warehouse portion of this alternative has

20% less square footage than the Project (which was determined to have less than significant VMT impacts). The gas station and retail use are also considered local-serving uses and so would be considered to have less than significant VMT impacts. Therefore, the DEIR concluded the DEIR Alternative would not be expected to result in significant VMT traffic impacts.

To better evaluate the potential traffic and VMT-related impacts of the proposed Alternative 2 Site Plan, detailed analyses were prepared by Urban Crossroads on Traffic and VMT dated October 26, 2022 and an updated Traffic and VMT analysis dated May 4, 2023. It should be noted that the Project applicant intends to process an application for Conditional Use Permits so that both of the fast-food restaurants would include single or double drive-throughs. Therefore, the calculations in the Traffic and VMT analysis have taken this into account as a worst-case estimate. Specifically, the study looked at 3,760 square feet of total fast food with drive through which is consistent with the applicant's intent regarding CUPs. Construction traffic associated with the new Alternative 2 Site Plan would not result in traffic circulation impacts that would be substantially different than estimated in the original traffic study for the DEIR (UC 2021).

**Trip Generation.** Consistent with the Perris and Ramona Warehouse (DPR19-00012) Traffic Analysis (dated March 8, 2021, and updated 5-4-2023), the proposed right-in only driveway on Ramona Expressway into the commercial retail component of Alternative 2 has been evaluated by Urban Crossroads (October 26, 2022, with focused update 5-4-2023) for the following analysis scenarios as part of the revised traffic assessment for the new Alternative 2 Site Plan:

- Existing plus Project
- Existing plus Ambient Growth plus Project plus Cumulative (EAPC)
- Horizon Year (2050) With Project

Assumptions to develop traffic volumes such as ambient background growth, cumulative projects, and post-processed long-range without project forecasts are also consistent with the 2021 Traffic Study. Trip generation represents the amount of traffic which is both attracted to and produced by a development. Determining traffic generation for a specific project is therefore based upon forecasting the amount of traffic that is expected to be both attracted to and produced by the specific land uses being proposed for a given development. In order to develop the traffic characteristics of the proposed project, trip-generation statistics published in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021) and empirical data were used to estimate the trip generation.

The following trip generation rate and vehicle mix were utilized for calculating the trip generation for the proposed Project:

- ITE land use code 154 (High-Cube Transload and Short-Term Storage Warehouse) has been used to derive site specific trip generation estimates for up to 304,572 square feet. High-cube transload/short-term storage warehouse data regarding the truck percentage and vehicle mix has been obtained from the ITE's latest Trip Generation Manual. The truck percentages were further broken down by axle type per the following SCAQMD recommended truck mix: 2-Axle = 16.7%; 3-Axle = 20.7%; 4+-Axle = 62.6%.
- ITE land use code 822 (Strip Retail) and ITE land use code 934 (Fast-Food Restaurant With Drive-Through Window) have been used to derive site specific trip generation estimates for up to 6,960 square feet of commercial retail use.

A passenger-car equivalent (PCE) of 1.5, 2.0, and 3.0 have been applied to 2-axle, 3-axle, and 4+-axle vehicles, consistent with the City's Guidelines. PCE rates were calculated by taking the actual vehicle trip generation rates and applying the PCE factors. PCEs allow the typical "real-world" mix

of vehicle types to be represented as a single, standardized unit, such as the passenger car, to be used for the purposes of capacity and level of service analyses.

The new proposed Alternative 2 Site Plan includes retail and restaurant uses so pass-by percentages have been obtained from the ITE Trip Generation Manual. Pass-by trips account for trips that are currently on the existing roadway network that would stop by uses within the proposed Project on their way to their ultimate destination. The trip generation of the EIR Project, EIR Alternative 2, and the new Alternative 2 Site Plan are shown in **Table 6, Trip Generation Comparison**.

The new proposed Alternative 2 Site Plan would generate a total of 1,594 two-way trips per day with 152 AM peak hour trips and 124 PM peak hour trips (actual vehicles). Per the City’s Guidelines, any operations analysis is to utilize the PCE trip generation. The new Site Plan is also anticipated to generate a total of 1,698 two-way PCE trips (which take into account greater impacts for trucks) per day with 162 AM PCE peak hour trips and 128 PM PCE peak hour trips (UC 2023).

**Table 6  
Trip Generation Comparison**

<b>Scenario</b>	<b>AM Peak Hour Trip</b>	<b>PM Peak Hour Trips</b>	<b>Total Trips</b>	<b>PCE Trips</b>
EIR Project	32	39	492	612
EIR Alternative 2	158	180	1,812	1,912
Alternative 2 Site Plan	152	124	1,594	1,698
Significant Difference from EIR Project?	No	No	No	No

Sources: **Table 1** this document, PVCC SPA EIR, **Appendix D – TG Memo**, Table 2 PCE = passenger car equivalents (of trucks)

**Intersection Operations and Queuing Analysis (Right-In Only Driveway).** The intersection operations analysis for the right-in only driveway on Ramona Expressway (Driveway 5) are anticipated to have no delays since there would be no conflict with the inbound traffic (no outbound traffic proposed). As such, the driveway is anticipated to operate at an acceptable level of service (LOS) for all analysis scenarios. Attachment A includes the analysis worksheets. The peak hour queuing analysis at Driveway 5 indicates that a minimum turn pocket length of 250-feet should be accommodated on Ramona Expressway. Driveway 5 has also been designed to prohibit outbound access, limited to right-in access only from Ramona Expressway.

**VMT Screening Evaluation.** The supplemental VMT Analysis determined the proposed Alternative 2 Site Plan meets the Local-Serving Land Use Screening Criteria for the retail component and the Net Daily Trips Screening Criteria of less than 500 ADT for the warehouse component of the Site Plan (i.e., warehouse would produce 428 daily trip ends). Therefore, no additional VMT analysis is needed and potential VMT impacts of the Alternative 2 Site Plan are considered to be less than significant and no mitigation is required based on the City’s traffic study and VMT guidelines (UC 2023).

In addition, the DEIR recommended the Project, and any alternatives, implement **Standard Conditions SC-TR-1** through **SC-TR-4** while the Project and any alternatives would also be required to implement **PVCCSP EIR mitigation measures MM Air 2** (under Air Quality above), **MM Trans 1**, **MM Trans 2**, and **MM Trans 5**; therefore, the new Alternative 2 Site Plan would implement these conditions and measures as well.

**PVCC SPA 13 EIR Standard Conditions and PVCCSP EIR Mitigation Measures**

- SC-TR-1** Prior to any Project construction the Project Applicant shall develop and implement City- approved Traffic Control Plan (TCP) addressing potential construction- related traffic detours and disruptions. In general, the TCP will ensure that to the extent practical, construction traffic would access the Project site during off-peak hours; and that construction traffic would be routed to avoid travel through, or proximate to, sensitive land uses.
- SC-TR-2** The Board of Supervisors of the County of Riverside and the Councils of the Cities of Western Riverside County enacted the Transportation Uniform Mitigation Fee (TUMF) to fund the mitigation of cumulative regional transportation impacts resulting from future development. The mitigation fees collected through the TUMF program will be utilized to complete transportation system capital improvements necessary to meet the increased travel demand and to sustain current traffic levels of service.
- The fee calculations are based on the proportional allocation of the costs of proposed transportation improvements based on the cumulative transportation system impacts of different types of new development. Fees are directly related to the forecast rate of growth and trip generation characteristics of different categories of new development. Fees shall be paid at the time a certificate of occupancy is issued for the Development Project or upon final inspection, whichever comes first. Payment of the TUMF is required and is not considered unique mitigation under CEQA.
- SC-TR-3** The Project applicant shall pay Development Impact Fees (DIF) for non-residential development prior to the issuance of a building permit.
- SC-TR-4** The Project applicant shall pay the North Perris Road and Bridge Benefit District (NPRBBD) fee for non-residential development prior to the issuance of a building permit.
- PVCCSP MM Trans 1** Future implementing development projects shall construct on-site roadway improvements pursuant to the general alignments and right-of-way sections set forth in the PVCC Circulation Plan, except where said improvements have previously been constructed.
- PVCCSP MM Trans 2** Sight distance at the project entrance roadway of each implementing development project shall be reviewed with respect to standard City of Perris sight distance standards at the time of preparation of final grading, landscape and street improvement plans.
- PVCCSP MM Trans 5** Bike racks shall be installed in all parking lots in compliance with City of Perris standards.

Tribal Cultural Resources

DEIR Subsection 4.11 determined the proposed Project would not have any significant impacts on identified tribal cultural resources, but local tribes requested they be allowed to monitor grading to assure no buried cultural resources were impacted. DEIR Subsection 4.11 determined impacts on these resources would be less than significant with implementation of cultural resources mitigation measures.

The Lower Intensity Industrial Alternative would develop the entire Project site and so would have the same impacts as the Project and require the same mitigation. Neither the Project nor the Alternative would cause a significant impact on tribal resources. However, the EIR acknowledged that implementation of Project **Mitigation Measures MM-CR-1** and **MM-CR-2** (under Cultural Resources above) would also be applicable to tribal cultural resources.

Uses developed under the proposed Alternative 2 Site Plan would require the same mitigation relative to grading the site to protect unexpected tribal cultural resources. Impacts would be less than significant with implementation of the recommended mitigation measures.

### Utilities and Service Systems

Development of the Project will require additional water supplies, generate additional wastewater, require construction of onsite and nearby drainage improvements, and connections to existing energy systems. Subsection V.19 of the Initial Study concluded the impacts of these incrementally increased services will be less than significant with implementation of **Standard Conditions SC-USS-1** through **SC-USS-4** regarding payment of sewer and water connection fees, using water efficient construction techniques, and reducing solid waste generation.

Development of the site under the EIR Lower Intensity Industrial Alternative or the new proposed Alternative 2 Site Plan would require a similar consumption of water, generation of wastewater, runoff, and electricity and natural gas compared to the EIR Project warehouse. However, neither of the alternatives nor the Project will result in significant impacts to utilities and service systems (i.e., water, sewer, stormwater, solid waste, electricity, or natural gas).

### **PVCC SPA 13 EIR Standard Conditions**

- SC-USS-1** Sewer Connection Fees. Prior to the issuance of a certificate of occupancy, the Project applicant shall pay the applicable sewer connection fees to EMWD.
- SC-USS-2** EMWD Water Efficient Guidelines. The Project will be required to comply with shall be required to comply with the EMWD Water Efficient Guidelines for New Development which are in effect at the time of building permit issuance.
- SC-USS-3** Water Connection Fees. Prior to the issuance of a certificate of occupancy, the Project applicant shall pay the applicable water connection fees to EMWD.
- SC-USS-4** Solid Waste. The Project applicant shall comply with the requirements of AB 939 ("California Integrated Waste Management Act of 1989"), which requires waste diversion mandates. During construction and operation, the applicant shall achieve diversion of 50 percent of all solid waste through source reduction, recycling, and composting activities.

### Wildfire

Subsection V.20 of the Initial Study determined the Project site is not in a designated high fire risk area and the Project would not substantially impair access along the three major roadways around the Project site. Based on that analysis, potential impacts related to wildfire conditions, an adopted emergency response plan, or emergency evacuation plan will be less than significant. **PVCCSP EIR mitigation measure MM Air 2** (under Air Quality above) shall apply to the proposed Project.

The Lower Intensity Industrial Alternative and the new proposed Alternative 2 Site Plan would

develop the same site that has the same wildfire-related constraints. Therefore, there would be no wildfire resource impacts from this alternative or the proposed Project. **PVCCSP EIR mitigation measure MM Air 2** (under Air Quality above) shall also apply to the new Alternative 2 Site Plan.

### 3.1 Summary of Impacts and Project Objectives

The DEIR determined the Lower Intensity Industrial Alternative would achieve the following PVCCSP-related objectives for non-residential development to a similar level as the proposed Project:

- Provides a development plan of superior environmental sensitivity including a high quality of visual aesthetics, suppression of noise, protection of health and safety, and the promotion of community and region.
- Considers topographic, geologic, hydrologic, and environmental opportunities and constraints to create a design that generally conforms to the character of the land by retaining and utilizing basic, existing landforms, as much as possible.
- Provides additional employment opportunities for the current and future residents of the region and surrounding communities.

These objectives would also be met to the same or a similar degree by the new Alternative 2 Site Plan. The only difference between the two alternatives is the DEIR Alternative included a gas station while the new Alternative 2 Site Plan eliminates the gas station but has slightly more retail commercial uses.

The DEIR determined that Alternative No. 2 would generate an equivalent number of employees and revenue to the City based on the proposed uses under this Alternative compared to the Project.

Based on the analysis provided above, development of the new Alternative 2 Site Plan would result in the following impacts:

#### Similar Impacts to Project

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Land Use and Planning
- Population and Housing
- Public Services – Fire, Police, Schools, Parks
- Recreation
- Utilities and Service Systems - Water, Sewer, Stormwater, Solid Waste, Electricity/Natural Gas
- Tribal Cultural Resources
- Wildfire

Lesser Impacts than Project

- Greenhouse Gas Emissions

Greater Impacts than Project

- Transportation-VMT

**3.2 Summary of Impacts and Environmentally Superior Alternative**

The DEIR determined the Lower Intensity Industrial Alternative 2 would have impacts that are slightly greater than the Project for air quality, greenhouse gas emissions, and transportation-VMT, mainly due to the presence of the gas station and restaurant. The rest of the impacts are similar to those of the Project (less than significant or no impact). When compared to the other alternatives evaluated in the DEIR, the DEIR also concluded the Lower Intensity Industrial Alternative was the Environmentally Superior Alternative because its impacts are equivalent to those of the proposed Project. The EIR also found that alternative also met the Project Objectives to a much greater degree than either of the other alternatives.

The new proposed Alternative 2 Site Plan is similar to the development characteristics except it does not have a gas station and instead has more commercial uses. The additional information provided in this document and the supporting technical analyses concludes the potential environmental impacts of the new Alternative 2 Site Plan would be similar to or less than those identified for the Lower Intensity Industrial Alternative 2 in the DEIR and similar to those of the original proposed Project evaluated in the DEIR.

Therefore, the City may select the new proposed Alternative 2 Site Plan as equivalent to the DEIR Alternative 2 in terms of characteristics and impacts. Certification of the PVCC SPA13 EIR and selection of the new proposed Alternative 2 Site Plan would comply with the requirements of CEQA and not require a Statement of Overriding Considerations (SOC) because the preceding analysis has demonstrated the new proposed Alternative 2 Site Plan would result in no significant environmental impacts after mitigation, similar to the conclusion for the Project demonstrated in the PVCC SPA 13 EIR.



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**SOURCES AND TECHNICAL STUDIES (provided electronically)**

*Perris and Ramona Warehouse (DPR19-00012) Air Quality, Greenhouse Gas, Health Risk, & Energy Assessment*, prepared by Urban Crossroads, original version November 9, 2022, updated 5-16-2023 (**Appendix A**).

*Perris and Ramona Warehouse Noise Assessment*, prepared by Urban Crossroads, original version November 8, 2022, updated 5-11-2023 (**Appendix B**).

*Expressway Commerce Center (Perris and Ramona Warehouse) Vehicle Miles Traveled (VMT) Screening Evaluation*, prepared by Urban Crossroads, November 7, 2022 (**Appendix C**).

*Perris and Ramona Warehouse Focused Traffic and VMT Assessment*, prepared by Urban Crossroads, original version October 26, 2022, updated May 4, 2023 (**Appendix D**).

*Project-Level Water Quality Management Plan (WQMP), Perris and Ramona Warehouse Project, City of Perris*, prepared by United Engineering Group (UEG 2023), Original Date Approved February 2022, Revised January 2023 (**Appendix E**).

*Airport Land Use Commission (ALUC) Development Review, ZAP1544MA22, APN 303-060-020, Riverside County ALUC*, January 12, 2023 (**Appendix F**)