ADDENDUM TO THE SOUTH PERRIS INDUSTRIAL PROJECT FINAL ENVIRONMENTAL IMPACT REPORT FOR THE PHASE 2 SITE (State Clearinghouse #2008071060)

Perris Logistics Center South Major Modification (PLN 22-005265)



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October 2023

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Appendix 7 Hydrology Report – Building 3

Appendix 8 Trip Generation Analysis

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| <u>Acronym</u> | Definition |
|-----------------|--|
| § | Section |
| §§ | Sections |
| AB | Assembly Bill |
| AB 32 | California Global Warming Solutions Act of 2006 |
| AB 52 | Native Americans: California Environmental Quality Act |
| ACOE/Corps | Army Corps of Engineers |
| ALUC | Airport Land Use Commission |
| AMSL | Above Mean Sea Level |
| AOI | area of interest |
| APN | Assessor Parcel Number |
| AQMP | Air Quality Management Plan |
| ASTM | American Society of Testing and Materials |
| ASTs | Above ground storage tanks |
| Av. | Avenue |
| BACM | Best Available Control Measure |
| BAU | Business as Usual |
| B.C. | Before Christ |
| BFSA | Brian F. Smith and Associates |
| bgs | Below ground surface |
| Blvd. | Boulevard |
| BMPs | Best Management Practices |
| BLM | Bureau of Land Management |
| B.P. | Before Present |
| CA | California |
| CAA | Federal Clean Air Act |
| CAAQS | California Ambient Air Quality Standards |
| CalEEMod™ | California Emissions Estimator Model |
| CalEnviroScreen | California Communities Environmental Health Screening Tool Version 3.0 |
| CalEPA | California Environmental Protection Agency |
| CalFire | California Department of Forestry and Fire Protection |
| CALGreen Code | California Green Building Standards Code |
| CalRecycle | California Department of Resources Recycling and Recovery |
| Caltrans | California Department of Transportation |
| CAP | Climate Action Plan |
| CAPP | Community Air Protection Program |
| CAPCOA | California Air Pollution Control Officers Association |
| CAPSSA | Criteria Area Plant Species Survey Area |
| CARB | California Air Resources Board |
| CAPSA | Criteria Area Plant Survey Area |

CARB California Air Resources Board
CASSA Criteria Area Species Survey Area
CASP California Aviation System Plan

CASQUA California Stormwater Quality Association

CAW California American Water CBC California Building Code

CBSC California Building Standards Code

CBSC California Building Standards Commission

CCAA California Clear Air Act
CCR California Code of Regulations

CDC California Department of Conservation
CDD Community Development Director
CDE California Department of Education

CDFW California Department of Fish and Wildlife CEQA California Environmental Quality Act CESA California Endangered Species Act

CFC California Fire Code

CH4 Methane

CHRIS California Historic Resources Information System

CLCA California Land Conservation Act Conditional Letter of Map Revision **CLOMR** Comprehensive Land Use Plan **CLUP CMP Congestion Management Program** California Natural Diversity Database **CNDDB** Community Noise Equivalent Level **CNEL** California Native Plant Society **CNPS** California Natural Resources Agency **CNRA** Corona-Norco Unified School District **CNUSD**

CO Carbon Monoxide CO2 Carbon Dioxide

CO2e Carbon Dioxide Equivalent

CPUC California Public Utilities Commission

CWA Clean Water Act CZ Change of Zone

D Urban and Built-Up Land

dB Decibel

dBA A-weighted Decibels
DIF Development Impact Fee
DPM Diesel Particulate Matter

DWR Department of Water Resources

EDD Employment Development Department EIA Energy Information Administration

EIR Environmental Impact Report EMFAC Emission Factor Model

EMWD Eastern Municipal Water District EPA Environmental Protection Agency EPS Emission Performance Standard

ESA Endangered Species Act

F Fahrenheit

FAA Federal Aviation Administration
FEIR Final Environmental Impact Report
FEMA Federal Emergency Management Agency

FHSZ Fire Hazard Severity Zone FIRM Flood Insurance Rate Map

ft feet

ft3/s cubic feet per second FTA Federal Transit Association

FY Fiscal Year

GHG Greenhouse Gas

GIS Geographic Information System

GISD Geographic Information Services Database

GP General Plan

GPA General Plan Amendment

gpd Gallons per Day gpm Gallons per minute

GSA Groundwater Sustainability Agencies
GSP Groundwater Sustainability Plans

GWP Global Warming Potential

HCP Habitat Conservation Plan

HDT heavy duty truck
HDV Heavy-duty vehicles
HFCs Hydrofluorocarbons

Hp horsepower

Hp-hr-gal horsepower hour per gallon HRA Health Risk Assessment

HREC Historical Recognized Environmental Condition

HSC Health and Safety Code

I Interstate i.e. that is

IBC International Building Code
IE Infrastructure Element

IEPR Integrated Energy Policy Report

in/sec inches per second

IPCC Intergovernmental Panel on Climate Change

IS Initial Study

ISTEA Intermodal Surface Transportation Efficiency Act

ITE Institute of Transportation Engineers

ITIP Interregional Transportation Improvement Plan IWMA Integrated Waste Management Act of 1989

IWMP Integrated Waste Management Plan

JD Jurisdictional Delineation JPA Joint Powers Authority JPR Joint Project Review

kBTU kilo-British Thermal Units

kg kilogram

kBTU kilo-British thermal units

kWh kilowatt-hour

LBP Lead based paint

lbs pounds

lbs/day pounds per day

Leq equivalent continuous sound level

LOS Level of Service

LRA local responsibility area

LSTs Localized Significance Thresholds

MBTA Migratory Bird Treaty Act

mg milligrams

MGD million gallons per day

MMRP Mitigation Monitoring and Reporting Program

MND Mitigated Negative Declaration

mpg miles per gallon Mph Miles per hour

N/A Not Applicable n/o North of

n/o North of North of N2 Nitrogen n.d. no date

NAHC Native American Heritage Commission NAAQS National Ambient Air Quality Standards

NAGPRA Native American Graves Protection and Repatriation Act

NAIOP Commercial Real Estate Association

ND Negative Declaration

NEPSA Narrow Endemic Plant Survey Area

NEPSSA Narrow Endemic Plant Species Survey Area

NFIP National Flood Insurance Program
NHL National Historic Landmark

NHP National Register of Historic Places

NO Nitric Oxide
NO2 Nitrogen Dioxide
NOX Nitrogen Oxides
NOP Notice of Preparation

NPDES National Pollutant Discharge Elimination System

P-WQMP Project Specific Preliminary Water Quality Management Plan

Pb Lead

PCBs Polychlorinated biphenyls
PCEs Passenger Car Equivalents
PDF Project Design Feature

p.m. Post Meridiem (between the hours of noon and midnight)

PM Particulate Matter

PM2.5 Fine Particulate Matter (2.5 microns or smaller)
PM10 Fine Particulate Matter (10 microns or smaller)
Porter-Cologne Water Quality Control Act

PPV peak particle velocity

PRC Professional Regulation Commission

PRC Public Resources Code

PRIMP Paleontological Resource Impact Mitigation Program
PRMMP Paleontological Resources Mitigation and Monitoring Plan

PRPA Paleontological Resources Preservation Act

PSE Public Safety Element

psi per square inch

RCFCWCD Riverside County Flood Control and Water Conservation District

RCFD Riverside County Fire Department

RCIT Riverside County Information Technology

RCP Regional Comprehensive Plan

RCPG The SCAG Regional Comprehensive Plan and Guide

Rd. Road

REC Recognized environmental Concerns

RHNA The SCAG Regional Housing Needs Assessment

ROW Right of Way

RPS Renewable Portfolio Standards RR Regulatory Requirement

RTPA Regional Transportation Planning Agency

RTP/SCS Regional Transportation Plan/Sustainable Communities Strategy

RWQCB Regional Water Quality Control Board

SAA Streambed Alteration Agreement

SB 50 Senate Bill 50, Leroy F. Greene School Facilities Act

SCAB South Coast Air Basin

SCAG Sothern California Association of Governments SCAQMD Southern Coast Air Quality Management District

SCCIC South Central Coastal Information Center

SCE Southern California Edison

SCH California State Clearinghouse (Office of Planning and Research)

SCRRA Southern California Regional Rail Authority

SCS Sustainable Communities Strategy
SCWR Southern Cottonwood Willow Riparian

SDWA Safe Drinking Water Act SED socio-economic data SF/s.f. square foot or square feet

SGMA Sustainable Groundwater Management Act

SHMA Seismic Hazards Mapping Act
SHPOs State Historic Preservation Officers
SHPO State Historic Preservation Office
SHRC State Historical Resources Commission

SHS State Highway System
SKR Stephens' Kangaroo Rat

SLF Sacred Lands File

s/o south of

SO2 Sulfur Dioxide

SOC Statement of Overriding Considerations

SoCal Southern California

SoCal Gas Southern California Gas Company

SRA State Responsibility area

SSMP Sewer System Management Plan

St. Street

SWMP Stormwater Management Plan

SWP State Water Project

SWPPP Storm Water Pollution Prevention Plan SWRCB State Water Regional Control Board

TIA Transportation Generation Analysis

TAC Toxic Air Contaminants
TAZ traffic analysis zone
TCRs Tribal Cultural Resources

TDA Transportation Development Act

TPD tons per day

TPM Tentative Parcel Map

TRUs Transportation Refrigeration Units

TSF Thousand Square Feet

TTM Tentative Tract Map

TUMF Transportation Uniform Mitigation Fee

USCB United States Census Bureau
USDA U.S. Department of Agriculture
U.S. DOE United States Department of Energy

U.S DOT United States Department of Transportation USEPA United States Environmental Protection Agency

USFWS United States Fish and Wildlife Service USGS United Stated Geological Society

USTs Underground storage tanks
UWMP Urban Water Management Plan

VHFHSZ Very High Fire Hazard Severity Zone

VMT Vehicle Miles Traveled

w/ with

WDR Water discharge report

WDRs Waste Discharge Requirements WMI Watershed Management Initiative

w/o West of

WoUS Waters of the United States
WQMP Water Quality Management Plan

WRCOG Western Riverside Council of Governments

WRF Water Reclamation Facility
WRP Water Reclamation Plan
WSA Water Supply Assessment
WUI wildland-urban interface

Yr year

1 INTRODUCTION

On July 13, 2010, the City of Perris ("City") certified an associated Environmental Impact Report (EIR) and approved the South Perris Industrial Project ("Original Project"), which allowed the development of up to 7.4 million square feet of distribution warehousing uses on three (3) noncontiguous sites, described in the EIR as Phase 1, Phase 2, and Phase 3. Since that time, the City has approved two major modifications to Phase 3 which reduced the amount of approved building space on that particular site. The applicant is now requesting approval of a major modification for Phase 2. This addendum has been prepared to determine if proposed modifications to the development of Phase 2 envisioned by the Original Project and analyzed in the previously certified EIR – which would ultimately reduce the total square footage developed on the Site – would result in any new or increased significant impacts not analyzed in the previously certified EIR for the Original Project. As set forth herein, it would not, and as a result, this addendum is the appropriate document for the City's consideration of the proposed modification under the California Environmental Quality Act (CEQA).

2 ORIGINAL PROJECT APPROVAL

On July 13, 2010, the City approved the Original Project and certified the South Perris Industrial EIR, which disclosed and analyzed all of the Original Project's potential impacts on the environment pursuant to CEQA. As referenced above, the Original Project involved three (3) noncontiguous sites, described in the EIR as Phase 1, Phase 2, and Phase 3, as shown in Figure 1, and allowed for the development and operation of up to 7.4 million square feet of distribution warehousing uses, in nine (9) concrete tilt up buildings, to be constructed on a total of 458 acres (Project area). Specifically, the Original Project envisioned:

- 1) One 783,700 square foot warehouse building on 38 acres (Phase 1);
- 2) Four (4) buildings totaling 3,448,734 square feet on 201 acres (Phase 2); and
- 3) Four (4) buildings totaling 3,166,857 square feet on 216 acres (Phase 3).

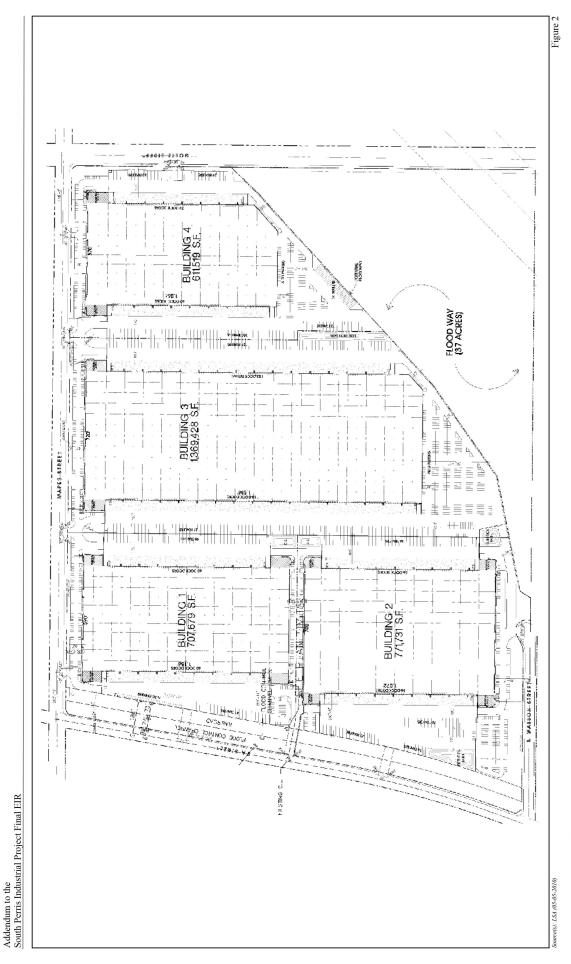
The majority of land within the Project area is vacant. The I-215 Freeway bounds the Project area on the east and runs in a northwest to southeast direction. The Perris Valley Airport is located near the center of the project area adjacent to the Phase 1 site. South of the project area and adjacent to the southernmost site, the approximately 201-acre Phase 2 site (the "Site"), which is located at the southeast corner of Mapes Street and "A" Street, the San Jacinto River runs in a northeast to southwest direction. The northernmost site is the Phase 3 site, which is bound by 7th Street to the north, Ellis Avenue to the south, Redlands Avenue to the west and I-215 to the east. The Phase 3 site is currently under construction.

Particularly relevant to this Addendum, Phase 2 was referred to in the previously certified EIR as the First Park South Perris Distribution Center and, in addition to the four buildings totaling 3,448,734 square feet, was assumed to provide 548 docking areas for the loading and unloading of trucks, parking for up to 1,213 trucks and trailers, and parking for up to 1,904 passenger vehicles. In addition to deliveries by trucks, goods were also assumed to be delivered to and from Phase 2 by rail cargo through rail access spurs near the west side of Buildings 1 and 2. The original site plan for Phase 2 is shown in Figure 2.













To raise the Phase 2 Site out of the 100-year floodplain, the development could require the importation of approximately 660,000 cubic yards of fill materials. The fill would come from the Romoland area, west of I-215, and south of Ethanac Road. Consequently, delivery would use the Case Road interchange on I-215. In the event delivery trucks would come from the north, it is anticipated delivery trucks would also use the I-215 interchange at Case Road in order to reduce truck traffic through downtown Perris. Short-term air quality, noise, and traffic impacts attributable to the imported fill material were addressed in the certified EIR.

Flows generated on site would be routed through a series of gutters, swales, and underground piping. On-site flows would ultimately be conveyed to a 2-million-gallon detention basin and sand filtration trench. Flows treated in the proposed sand filtration trench would be discharged by two sump pumps onto vacant land to the south where flows would travel until reaching Reach 3 of the San Jacinto River.

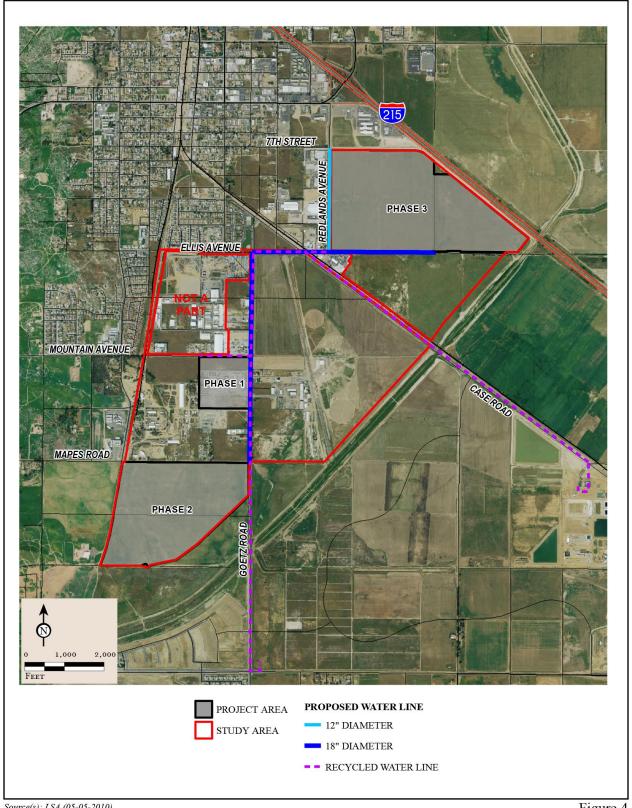
Small portions of the Phase 2 Site are located within Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Criteria Cells (Cell No. 3470). The project is considered a Covered Activity under Section 7.3 of the MSHCP and would be required to adhere to the Best Management Practices found in Appendix C of the MSHCP.

The Original Project assumed – and in fact required – that extensive offsite infrastructure improvements would be developed to facilitate the Original Project, as shown (in part) by the improvements required by the Development Agreements approved along with the Original Project. The approved roadway improvements are shown in Figure 3, the approved water improvements are shown in Figure 4, and the approved sewer improvements are shown in Figure 5. Accordingly, the previously certified EIR analyzed and covered all impacts from offsite improvements necessary to facilitate the envisioned industrial development.

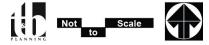
Addendum to the South Perris Industrial Project Final EIR

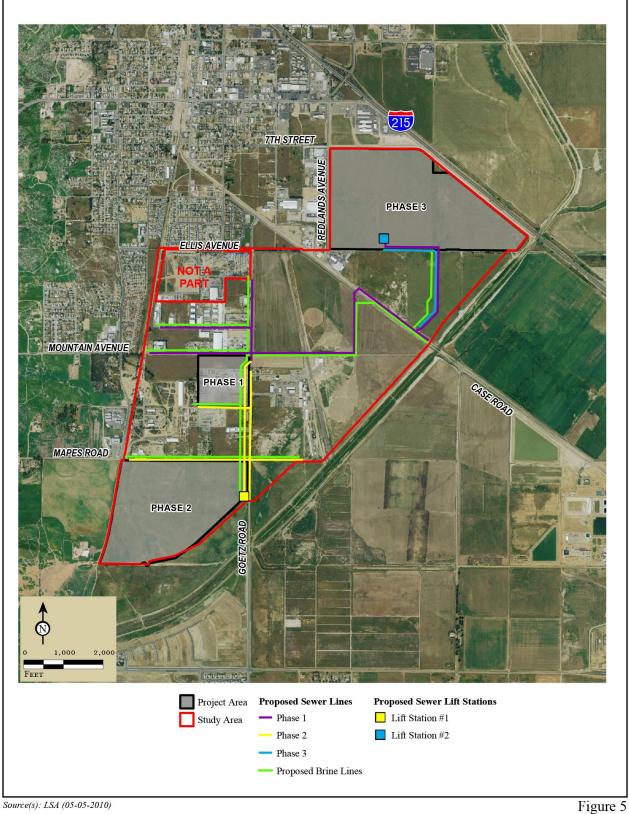


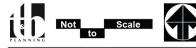




Source(s): LSA (05-05-2010) Figure 4







3 PREVIOUS ADDENDA TO THE CERTIFIED EIR

In 2020, the City approved a Major Modification to Phase 3 (20-05166). The Major Modification allowed for two alternative amendments to the approved Phase 3 development. Under Plan A, Phase 3 would be developed with 2,869,677 square feet in three buildings. Under Plan B, Phase 3 would be developed with 2,358,347 square feet in three buildings and the development would also include a rail spur. The potential environmental impacts associated with the Major Modification were evaluated in an Addendum to the previously certified EIR. While the City only approved the entitlements for Plan B, it approved the entire 2020 Addendum, and therefore found that its analysis of the potential impacts of Plan A complied with CEQA, and that analysis remained valid.

In 2021, the City approved a second Major Modification to Phase 3 (21-05054), which allowed for the development of up to 2,840,838 square feet in in three buildings and a rail spur. The potential environmental impacts associated with the second Major Modification were evaluated in a second Addendum to the previously certified EIR.

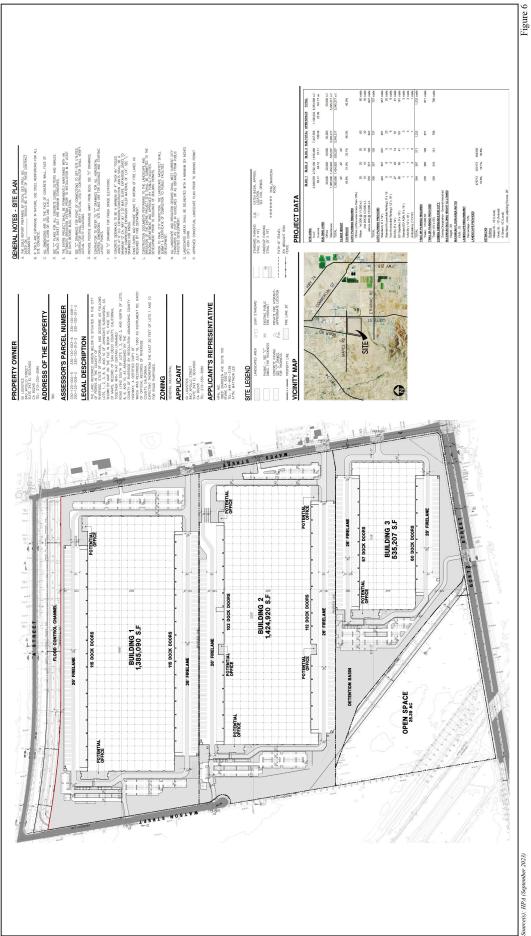
With these two addenda, the overall impacts of the Original Project have been incrementally reduced when compared to what was assumed in the previously certified EIR.

4 PROPOSED MAJOR MODIFICATION TO PHASE 2

The applicant is now proposing a Major Modification to Phase 2 – now referred to as the IDI Perris Logistics Center South or PLC South (the "Project") – that would reduce the total number of concrete tilt up warehouse/distribution buildings at the Phase 2 Site from four (4) to three (3), and reduce overall square footage from the 3,448,734 square feet approved under the Original Project to 3,345,217 square feet, for a net reduction of 103,517 square feet.

The Project includes Tentative Parcel Map No. 38518 and the development and operation of three (3) new industrial buildings (Building 1 through Building 3) situated on the Phase 2 Site, which would be of type III-B concrete tilt construction. Specifically, Building 1 would be approximately 1,385,090 square feet with a 42-foot clear height, Building 2 would be approximately 1,424,920 square feet with a 42-foot clear height, and Building 3 would be approximately 535,207 square feet with a 40-foot clear height. The foregoing square footages include 20,000 square feet of office space for Buildings 1 and 2, and 10,000 square feet for Building 3. The Project includes 1,232 automobile parking stalls and 786 trailer stalls (see Figure 6). The rail spur that was envisioned for Phase 2 in the Original EIR is no longer proposed.

The Project would also include on-site improvements such as street adjacent drainage channels, a detention basin, water quality features, storm drain, sewer and water systems, a sewer lift station, trash enclosures, pump houses, light pole standards, perimeter fencing as well as employee amenities. Landscape design would comply with City standards while providing a cohesive design with the Project's proposed architecture.



Addendum to the South Perris Industrial Project Final EIR

Not scale



In sum, the Project would reduce development on the Phase 2 Site by 103,517 square feet when compared to the development analyzed in the previously certified EIR. The Project's overall lot coverage is also less, at 38.6% compared to the Original Project's 41% coverage (a 2.4% decrease). The Project does not involve any development outside of the Site, which the previously certified EIR assumed would be developed by the Original Project, and the floodway area in the southeast corner of the Site would still be preserved as open space.

The Project would also result in additional benefits when compared to the Original Project, as it adds parking and reduces the number of drive cuts while providing greater flexibility for truck circulation and queuing, generally reducing the impacts on nearby city streets. Furthermore, the Project would separate the circulation for trucks, auto and pedestrians for efficiency and safety.

4.A Road Improvements

The Project would implement the following road improvements to include re-surfacing and pavement widening, as well as traffic signal modifications, aerial utility undergrounding, corner improvements and rail crossing modifications.

Goetz Road – Goetz Road is classified as an Arterial with a 128-foot right-of-way per the City of Perris General Plan Circulation Element, Exhibit CE-II. A 30-foot half width right-of-way is currently dedicated on Goetz Road along the portion of the property's easterly frontage. The street would be improved with 45 feet of new paving along either side, and curb/gutter located 47 feet on either side of centerline. The Project would dedicate the required additional 34 feet of right-of-way to provide for a 64-foot dedicated half-width right of way, for a total dedicated right-of-way of 94 feet. The road would be fully improved along the site's frontage.

Mapes Road – Mapes Road is classified as a Secondary Arterial with a 94-foot right-of-way per the City's General Plan Circulation Element, Exhibit CE-II. A 30-foot half width right-of-way is currently dedicated on Mapes Road along the property's northerly frontage. The Project would dedicate the required additional 17 feet of right-of-way to provide for a 47-foot dedicated half width right of way. The Project would improve both sides of Mapes Road from Goetz Road to "A" Street with a minimum of 30 feet of new paving on either side, and curb/gutter located 32 feet on either side of centerline within 94-foot full-width dedicated right-of-way. The road would be fully improved along the site's frontage.

"A" Street – "A" Street is classified as a Major Collector with a 78-foot right-of-way per the City's General Plan Circulation Element, Exhibit CE-II. A 35-foot half-width right-of-way is currently dedicated on "A" Street along the property's westerly frontage; however, this street is currently being analyzed to realign the centerline west to align with the existing improvements north of Mapes Road. The current design envisions a 39-foot half-width right of way with 26 feet of pavement to accommodate a single lane of traffic (passenger vehicles only) in either direction. The parkway would be fully improved along the Project's site frontage.

Watson Road – Watson Road is generally classified as a Major Collector with a 78-foot right-of-way per the City's General Plan Circulation Element, Exhibit CE-II. The Project includes 26 feet of pavement to accommodate a single lane of traffic (passenger vehicles only) in either direction to the end of the cul-de-sac.

Ellis Avenue – The Project would improve the portion of Ellis Avenue between Goetz Road and Case Road. Ellis Avenue is classified as an Arterial roadway with a 128-foot right-of-way per the City's General Plan Circulation Element, Exhibit CE-II. The Project would improve Ellis Avenue with 45 feet of new paving on either side of the road, with concrete curb and gutter located 47 feet on either side of centerline within the 128-foot dedicated right-of-way.

4.B Storm Drain Improvements

The Project would include the construction of an onsite storm drain system as part of the industrial facility and would also include the construction of offsite storm drain improvements. As part of the onsite system, each building would have a private storm drain system to collect the runoff from the site and convey it to a proposed channel to be constructed along the Project's perimeter as a flood control measure to protect the industrial facility. The channel would be constructed along the eastern frontage of "A" Street and the northern edge of the proposed Watson Road, and then continuing to the conservation area. The channel outlet is designed to discharge into a spreading basin which incorporates an overflow system that would create a sheet flow condition into the Conservation Area, ensuring that flows are perpetuated towards the San Jacinto River. The spreading basin and overflow system would allow for local runoff to be collected and dispersed in a sheet flow across the same area mimicking a flow regime like the pre-project condition existing prior to any construction activities. This sheet flow condition would be replicated for smaller and larger local storm events. The spreading basin would also receive flows from a public storm drain as part of the Goetz Road improvements.

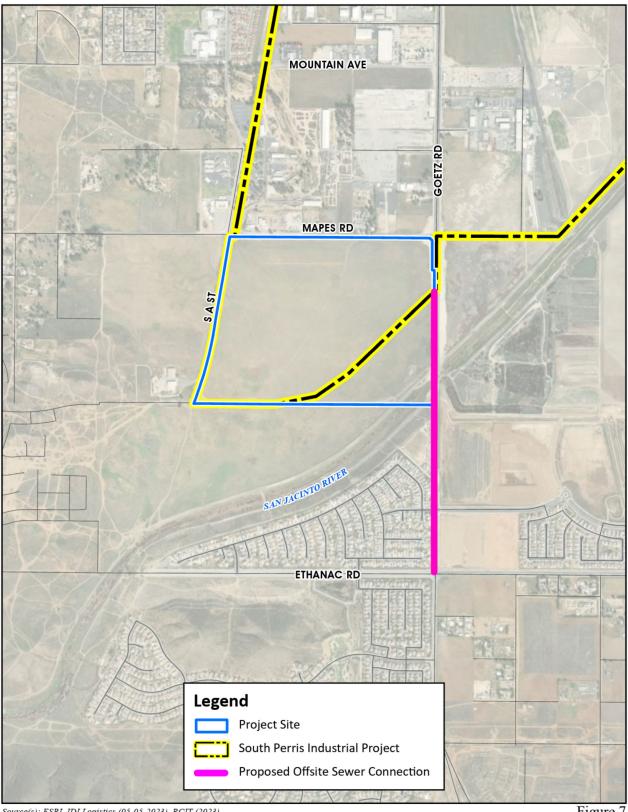
The on-site storm drain system would convey the low-flow water quality volumes to the proposed treatment devices. The onsite facility includes a detention basin in the southeast corner that would serve Building 3, whereas Buildings 1 and 2 would have underground treatment facilities. The water quality facilities would treat the Project site runoff for potential pollutants before comingling flows with offsite local runoff. The water quality basins (above and below ground) would allow the treated runoff to ultimately discharge into the spreading basin. As previously stated, the spreading basin would accept the flows from the Project Channel, on-site storm drains, and the public storm drain within Goetz. This spreading basin would ensure that offsite runoff and treated onsite runoff would be dispersed in a sheet flow condition.

The Project would also improve offsite storm drains that are not within the Project site but within the Original Project site boundary. As part of the proposed improvements to Mapes and Goetz Road, the Project would provide a public storm drain in both roadways. This storm drain would discharge into the proposed earthen channel on site and ultimately into the spreading basin. The Project is also conditioned to improve the existing (non-frontage) storm drains in Ellis Avenue. This would include proposed eatch basins at the intersection of Ellis Avenue and Case Road. This proposed storm drain would connect to storm drain in Case Road to be constructed as part of the PLC North Project.

4.C Sewer/Offsite Improvements

Offsite improvements discussed herein refer to physical improvements that would occur outside of the Original Project site boundary (Figure 7). The Eastern Municipal Water District (EMWD) currently operates a sewer lift station at the northwestern corner of Mapes Road and "A" Street. The lift station serves the Rob Reiner Child and Families Center and pumps northerly via a dual 3-inch force main into the City of Perris sewer system. The EMWD may direct flows from the Rob Reiner Child and Families Center with a future gravity sewer, and ultimately, the EMWD will disconnect from the City of Perris sewer system. This (private) system is not available for use by the Project. As such, the Project applicant would construct a new sewer system.

Project development would install a new sewer system that would extend from the proposed industrial facility to new sewer lines to be constructed within both Mapes Road and Goetz Road. Buildings 1 and 2 would connect to a sewer line that would be constructed in Mapes Road that extends east to the intersection of Mapes Road and Goetz Road. Building 3 would connect directly to the proposed sewer line in Goetz Road. All sewage flows would end up at a lift station that would be constructed onsite at the southwestern corner of the Mapes Road/Goetz Road intersection. From the lift station, all sewage flows would be directed south within a new sewer line to be constructed within Goetz Road. At the existing Goetz Road bridge, the sewer line would be constructed via jack-and-bore method under the San Jacinto River. South of the Goetz Road Bridge, the sewer line would be installed within Goetz Road to an existing sewer main at Goetz Road and Ethanac Road that extends east along Ethanac Road and then north towards the EMWD's Perris Valley Regional Water Reclamation Facility. This offsite sewer improvement would occur within the same alignment as the recycled water line for the Original Project.



Source(s): ESRI, IDI Logistics (05-05-2023), RCIT (2023)

Figure 7



5 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REVIEW CEQA Objectives

CEQA, a statewide environmental law contained in Public Resources Code Sections (§§) 21000-21177, applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. The overarching goal of CEQA is to protect the physical environment. To achieve that goal, CEQA requires that public agencies inform themselves of the environmental consequences of their discretionary actions and consider alternatives and mitigation measures that could avoid or reduce significant adverse impacts when avoidance or reduction is feasible. It also gives other public agencies and the general public an opportunity to comment on the information. If significant adverse impacts cannot be avoided, reduced, or mitigated to below a level of significance, the public agency is required to prepare an EIR and balance the project's environmental concerns with other goals and benefits in a statement of overriding considerations.

CEQA Requirements for Environmental Impact Report (EIR) Addendums

The Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines) allow for the updating and use of a previously-certified EIR for projects that have changed or are different from the previous project or conditions analyzed in the certified EIR. In cases where changes or additions occur with no new or more severe significant environmental impacts, an Addendum to a previously certified EIR may be prepared. See State CEQA Guidelines § 15164.

The following describes the requirements of an Addendum, as defined by State CEQA Guidelines § 15164:

- a. The lead agency or responsible agency shall prepare an Addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in § 15162 calling for preparation of a Subsequent EIR have occurred.
- An Addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in § 15162 calling for the preparation of a Subsequent EIR or negative declaration have occurred.
- c. An Addendum need not be circulated for public review, but can be included in or attached to the Final EIR.
- d. The decision-making body shall consider the Addendum with the Final EIR prior to making a decision on the project.
- e. A brief explanation of the decision not to prepare a Subsequent EIR pursuant to § 15162 should be included in an Addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

As noted above, State CEQA Guidelines §§ 15164(a) and (b) allow for the preparation of an Addendum if none of the conditions described in § 15162 are met. State CEQA Guideline § 15162 describes the conditions under which a Subsequent EIR must be prepared, as follows:

- a. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of environmental effects or a substantial increase in the severity of previously identified significant effects;
- b. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- c. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
 - 1. The project will have one or more significant effects not discussed in the previous EIR;
 - 2. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - 3. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternatives; or
 - 4. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

If none of these circumstances are present, and only minor technical changes or additions are necessary to update the previously certified EIR, an Addendum may be prepared. See State CEQA Guidelines § 15164. As provided in detail herein, none of the above circumstances that warrant the preparation of a Subsequent (or Supplemental) EIR are present. In fact, pursuant to Guidelines sections §§ 15163 and 15164, because the above conditions are not met, a Subsequent or Supplemental EIR is not required.

6 FORMAT AND CONTENT OF THIS EIR ADDENDUM

The following components comprise the EIR Addendum in its totality:

- a. The Introduction and the Project Description.
- b. The completed Initial Study/Environmental Checklist Form and its associated analyses which conclude that the proposed Project would not result in any new significant environmental impacts or substantially increase the severity of environmental impacts beyond those disclosed in the previously certified EIR.
- c. The technical appendices attached hereto as Appendices 1 through 9, which consist of the Air Quality and Greenhouse Gas (GHG) Assessment prepared by Urban Crossroads, Inc. (Urban Crossroads) (2023a), the Cultural Resources Records Search Report prepared by BFSA Environmental Services (BFSA) (2022a), the Paleontological Assessment prepared by BFSA (2022b), Preliminary Hydrology Calculations for Buildings 1, 2 and 3 by Thienes Engineering, Inc (Thienes) (2023a,b,c), Preliminary Water Quality Management Plan by Thienes (2023d), the Trip Generation Analysis prepared by Urban Crossroads (2023b), the Vehicle Miles Traveled ("VMT") Analysis by Urban Crossroads (2023c), and the Water and Sewer Report prepared by Thienes (2023e).

State CEQA Guidelines § 15150 states that an "EIR or Negative Declaration may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public." Accordingly, the above-listed technical reports are incorporated herein by reference pursuant to § 15150. In addition, this EIR Addendum incorporates the following additional documents by reference in accordance with § 15150:

The Draft and Final South Perris Industrial EIR (SCH No. No. 2008071060), accompanying Mitigation Monitoring Program (MMP), Technical Appendices to EIR, Findings and Statement of Facts, Statement of Overriding Considerations, and the associated City Council Resolution. The EIR was certified by the City Council on July 13, 2010.

All other materials before the City Council when it approved the Original Project and certified the EIR, specifically including but not limited to Ordinance No. No. 1271 and Resolution No. 4326 and all associated staff reports and attachments, as well as the materials that were previously before the City Planning Commission.

All previously approved addenda to the Original EIR and all associated staff reports, technical reports, surveys and other appendices, specifically including Addendum 20-0562 and Major Modification 19-05332 approved by the City Council in 2020, and Addendum 21-05054 and Major Modification 20-05166 approved by the City Council in 2021.

The above-referenced documents are available for public review on the City's website and at the City of Perris Planning Division, 135 N D Street, Perris, CA 92570.

Initial Study Checklist

The City prepared the Project's Initial Study Checklist as suggested by State CEQA Guidelines §§ 15063(d)(3) and 15168(c)(4). The State CEQA Guidelines include a suggested checklist to indicate whether the conditions set forth in § 15162, which would require a subsequent or supplemental EIR, are met and whether there would be new significant impacts resulting from the project not examined in the previously certified EIR. The checklist and an explanation of each answer on the form can be found in Section 6.

As presented in Section 6, there are four possible responses to each of the environmental issues included on the checklist:

- 1. <u>New Significant Impact</u>. This response is used to indicate when the Project has changed to such an extent that major revisions to the EIR are required due to the presence of new significant environmental effects.
- 2. <u>More Severe Impacts</u>. This response is used to indicate when the circumstances under which the Project is undertaken have changed to such an extent that major revisions to the EIR are required due to the fact that the severity of previously identified significant effects would substantially increase.
- 3. New Ability to Substantially Reduce Significant Impact. This response is used to indicate when new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified, indicates that there are new mitigation measures or alternatives available to substantially reduce significant environmental impacts of the Project, but the Project proponent declines to adopt the mitigation measure(s) or alternative.
- 4. **No Substantial Change from Previous Analysis**. This response is used to indicate that the Project would not create a new impact or substantially increase the severity of the previously-identified environmental impact.

The Initial Study Checklist and accompanying explanation of checklist responses provide the information and analysis necessary to assess relative environmental impacts of the Project currently proposed in the context of environmental impacts addressed in the previously certified EIR for the Original Project. In doing so, the City has determined than an addendum to the previously certified EIR is the appropriate CEQA document, and that due to fact that the Project would not result in any new or increased significant impacts, a subsequent or supplemental EIR is not required.

Environmental Factors Potentially Affected

The environmental factors checked below (\boxtimes) would be potentially affected by this project, involving at least one impact that is a "New Significant Impact" or "More Severe Impact" as indicated by the checklist on the following pages. As stated below, the modified project does not result in any new impacts that were not already analyzed in the previously certified EIR.

| | Aesthetics | | Hazards & Hazardous Materials | | Recreation |
|------|--|-------------------------------------|--|--|--|
| | Agriculture & Forest Resources | | Hydrology/Water Quality | | Transportation |
| | Air Quality | | Land Use / Planning | | Tribal Cultural Resources |
| | Biological Resources | | Mineral Resources | | Utilities/Service Systems |
| | Cultural Resources | | Noise | | Wildfire |
| | Energy | | Paleontological Resources | | Mandatory Findings of |
| | Geology/Soils | | Population/Housing | | Significance |
| | Greenhouse Gas Emissions | | Public Services | | |
| Det | ermination | | | | |
| On t | he basis of this initial evaluation: | : | | | |
| | REVIOUS ENVIRONMENTA Γ PREPARED: | L IN | MPACT REPORT/NEGATI | VE] | DECLARATION WAS |
| | I find that the proposed project CNEGATIVE DECLARATION | | • | ect o | n the environment, and a |
| ; | I find that although the proposed will not be a significant effect in agreed to by the project propon prepared. | this | case because revisions in the | proje | ct have been made by or |
| | I find that the proposed project ENVIRONMENTAL IMPACT | | - | on t | he environment, and an |
| | REVIOUS ENVIRONMENTA EPARED: | L IN | MPACT REPORT/NEGATI | VE] | DECLARATION WAS |
| 1 | I find that although the proposed NEW ENVIRONMENTAL DO significant effects of the proposed Negative Declaration pursuant to of the proposed project have been Declaration, (c) the proposed proposed identified in the earlier EII substantially increase the severity Negative Declaration, (e) no constitution of the proposed proposed project identified in the earlier EII substantially increase the severity Negative Declaration, (e) no constitution. | ed preaction avoiding a property of | MENTATION IS REQUIRE roject have been adequately a licable legal standards, (b) all oided or mitigated pursuant to will not result in any new sign Negative Declaration, (d) the the environmental effects ide | ED be analy pote that nification properties. | ecause (a) all potentially zed in an earlier EIR or ntially significant effects a earlier EIR or Negative ant environmental effects coposed project will not red in the earlier EIR or |

(f) no mitigation measures found infeasible have become feasible.

| inted Name | |
|---|---|
| athew Evans | Contract Planner |
| gnature | Date |
| Mathew Evans | October 4, 2023 |
| I find that at least one of the following cone Section 15162, exist and a SUBSEQUEN required: (1) Substantial changes are propose the previous EIR or negative declaration due effects or a substantial increase in the seve Substantial changes have occurred with respundertaken which will require major revision the involvement of new significant environm of previously identified significant effects; which was not known and could not have been the time the previous EIR was certified as cornary the following: (A) The project will have previous EIR or negative declaration; (B) substantially more severe than shown in the previous to adopt the mitigation measures alternatives which are considerably different declaration would substantially reduce one | |
| exist, but I further find that only minor addi EIR adequately apply to the project in the | bed in California Code of Regulations, Section 15162 tions or changes are necessary to make the previous changed situation; therefore, a SUPPLEMENT TO EPORT is required that need only contain the |
| EIR or Negative Declaration pursuant to applinecessary but none of the conditions describ | t effects have been adequately analyzed in an earlier licable legal standards, some changes or additions are led in California Code of Regulations, Section 15162 cified EIR or Negative Declaration has been prepared y or bodies. |
| E | EIR or Negative Declaration pursuant to app |

7 ENVIRONMENTAL ANALYSIS

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code §§ 21000-21178.1), the following has been prepared to analyze the Project to determine if any potential significant impacts upon the environment beyond those disclosed in the certified EIR would result from construction and implementation of the Project. As detailed herein, the Project would not result in any new or increased impacts not already analyzed in the previously certified EIR, nor is there any new information of substantial importance. The Project's impacts would be substantially similar in size, scale and impacts as those the EIR assumed would occur as part of the Original Project. Further, any impacts from offsite sewer improvements are also analyzed in, and fully covered by, the EIR. The Original Project identified sewer improvements that would extend from the Project north along Goetz Road to Mountain Avenue and ultimately to Case Road. Additionally, the Original Project identified recycled water line improvements that would extend from Case Road to Ellis Avenue, then Goetz Road to Ethanac Road. The Project would change the sewer improvement alignment to extend from the Project south along Goetz Road to Ethanac Road, similar to the recycled water line improvement. Therefore, physical impacts to the environment resulting from the sewer realignment have been analyzed in, and fully covered by, the EIR. Accordingly, all of the Project's potential environmental impacts are fully covered by the previously certified EIR.

7.A Aesthetics

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|----------|---|------------------------------|---------------------------|--|---|
| Would to | he project: | | | | |
| a. | Have a substantial adverse effect upon a scenic highway corridor within which it is located? | | | | \boxtimes |
| b. | Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view? | | | | × |
| c. | In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | | | | X |

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|----|--|------------------------------|---------------------------|--|---|
| d. | Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | | | | × |

The previously certified EIR prepared for the Original Project identified potential aesthetic impacts on scenic vistas, scenic resources, the existing visual character and its surroundings, and light and glare, resulting from development of the Original Project. The previously certified EIR concluded that all of these impacts resulting from the Original Project were less than significant, and no mitigation measures were required.

All the potential impacts of the Project, including the infrastructure improvements, are already covered by the previously certified EIR's analysis, and in fact, the Project would reduce impacts to all the categories of aesthetic impacts that the EIR assumed would result from the development of the Site. The Project would result in less overall square footage – by 103,517 square feet – and one less building as compared to the Original Project, generally reducing the already less than significant aesthetic impacts (*i.e.*, impacts on scenic vistas, scenic resources and highways, and existing visual character and its surroundings) disclosed and analyzed in the previously certified EIR, which assumed that the Site would be developed with more square footage (3,448,734 square feet), and with a higher percentage of lot coverage (41%). In addition, as described in the EIR, any additional light generated by the Project would be required to comply with lighting requirements contained in the City's Zoning Code and Riverside County Ordinance 655, and therefore, no significant light and glare impacts would result from the Project.

In sum, the Project would result in less development of the Site; thus, impacts related to aesthetics would generally be reduced when compared to the impacts resulting from the Original Project. Accordingly, the Project would not result in any new or increased significant impacts on aesthetics that were not already analyzed in, and fully covered by, the previously certified EIR.

7.B Agricultural Resources

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis | | |
|---|---|------------------------------|---------------------------|--|---|--|--|
| In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project: | | | | | | | |
| a. | Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use? | | | | × | | |
| b. | Conflict with existing zoning for agricultural use, or a Williamson Act contract? | | | | × | | |
| c. | Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | | | | × | | |
| d. | Result in the loss of forest land or conversion of forest land to non-forest use? | | | | × | | |
| e. | Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | | | | ⊠ | | |

The previously certified EIR determined that no farmland or agriculturally-zoned property would be significantly impacted by the Original Project. The previously certified EIR also concluded that, based on the Initial Study prepared for the Original Project, there were no significant impacts on agricultural or forestry resources such that further discussion in the previously certified EIR was not warranted. Although a portion of the Site, including the off-site infrastructure improvements, are designated "Locally Important Farmland", the EIR determined that due to the on-site soil characteristics, the local land use and planning designations of the Site (General Industrial), and

the economic and regulatory hurdles facing local famers, it was reasonable to conclude that the intensification of agricultural uses within the Original Project limits was not feasible. In fact, the City's 1991 General Plan Land Use Element redesignated all agricultural lands in the City for uses other than agriculture, thereby eliminating the City's General Plan "agricultural" land use designation. No mitigation measures were proposed or adopted, as the EIR concluded all impacts resulting from the Original Project were less than significant without mitigation.

The Project would result in the development of the same property -i.e., the Site - previously analyzed by the EIR, and therefore the Project would not affect any farmland or forest resources outside of the Original Project's development envelope, as analyzed in the EIR. Further, it bears noting that farming uses in the area of the Site have further declined since the EIR was certified, as the long-term plan is for increased urbanization and industrial uses, like the Project.

Accordingly, the Project would not result in any new or increased significant impacts on agricultural or forestry resources that were not already analyzed in, and fully covered by, the previously certified EIR.

7.C Air Quality

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|----|--|------------------------------|---------------------------|--|---|
| | wailable, the significance criteria established by district may be relied upon to make the following o | | | - | air pollution |
| a. | Conflict with or obstruct implementation of the applicable air quality plan? | | | | × |
| b. | Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? | | | | ⊠ |
| c. | Expose sensitive receptors to substantial pollutant concentrations? | | | | × |
| d. | Result in other emissions (such as those leading to odors adversely affecting a substantial number of people? | | | | × |

Short Term Construction Impacts

The EIR identified significant short-term impacts on air quality from the construction activities associated with the Original Project. Short term impacts identified in the EIR included fugitive dust and other particulate matter, as well as exhaust emissions generated by earthmoving activities and operation of grading equipment during site preparation. The EIR concluded that before mitigation, the short-term emissions produced during construction of the Original Project would exceed the South Coast Air Quality Management District (SCAQMD) thresholds of significance for volatile organic compounds (VOC), nitrogen oxides (NO_X), carbon monoxide (CO), fine particulate matter (PM₁₀), and respirable particulate matter (PM_{2.5}).

The EIR proposed several mitigation measures, which were adopted as follows:

- 4.3.6.1A Prior to issuance of grading permits, the project applicant shall require by contract specifications that construction operations rely on electricity from infrastructure (e.g., power poles) surrounding the construction site instead of using portable diesel- or gasoline-powered generators. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City.
- 4.3.6.1B Prior to the issuance of grading permits, the project applicant shall require by contract specifications that construction activities are timed so as not to interfere with peak hour traffic and minimize obstruction of through traffic lanes adjacent to the site. Dedicated turn lanes for the movement of construction trucks and equipment shall be provided for each phase of development. Construction trucks shall be routed away from congested streets and sensitive receptor areas. A flag person shall be retained by the construction supervisor to maintain safety adjacent to existing roadways. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City. In addition, the project applicant shall require by contract specifications the following provisions:
 - Prohibit truck idling in excess of five minutes, both on- and off- site;
 - Configure construction parking to minimize traffic interference;
 - Improve traffic flow by signal synchronization; and
 - All vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.
- 4.3.6.1C The construction contractor shall utilize alternative-fueled construction equipment to the maximum extent feasible. All diesel-powered construction equipment shall meet or exceed Tier III standards, or shall be equipped with CARB-verified oxidation catalysts and diesel particulate filter emission controls, using the greatest control efficiency for the specific category of equipment. The construction contractor shall demonstrate that these verified/certified technologies are available to be used at the time of project construction.

- 4.3.61D The construction contractor shall utilize pre-coated, pre-colored, and naturally colored building materials when feasible to minimize the amount of VOC emissions from painting activities. Coatings and solvents with a VOC content lower than required under SCAQMD Rule 1113 or no-VOC paints and architectural coatings shall be employed. A list of low/no-VOC paints is provided **SCAQMD** the website at (www.aqmd.gov/prdas/brochures/paintguide.html). All paints shall be applied using either high-volume low-pressure (HVLP) spray equipment or by hand application, or other application techniques with equivalent or higher transfer efficiency. Specific requirements shall appear in the project construction plans and construction documents.
- 4.3.6.2A In order to reduce particulate matter emissions during project construction, the project applicant shall apply non-toxic soil stabilizers or a comparable dust suppressant to all inactive construction areas (previously graded areas inactive for five consecutive days or more). Chemical soil stabilizers, if used, shall be applied according to manufacturers' specifications. This mitigation measure incorporates the applicable provisions identified in Rule 403 regarding soil stabilization.
- 4.3.6.2B In order to reduce particulate matter emissions during project construction, the project applicant shall establish a vegetative ground cover within 21 working days after active operations have ceased. This mitigation measure incorporates the applicable provisions identified in Rule 403 regarding revegetation of disturbed areas.
- 4.3.6C In order to reduce particulate matter emissions during project construction, the project applicant shall water exposed surfaces three times a day. This mitigation measure incorporates the applicable provisions identified in Rule 403 regarding watering of the site.
- 4.3.6.2D In order to reduce particulate matter emissions during construction, the project applicant shall enforce speeds limits on unpaved roads to less than 15 miles per hour.
- 4.3.6.2E In order to reduce particulate matter emissions during clearing, grading, earthmoving, excavation, or transportation of cut or fill materials, the project applicant shall utilize water trucks or sprinkler systems to prevent dust from leaving the site.
- 4.3.6F In order to reduce particulate matter emissions during construction, the project applicant shall utilize water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site.
- 4.3.6.2G In order to reduce particulate matter emissions during construction, the project applicant shall temporarily terminate soil disturbance activities when high

winds exceeding 25 miles per hour (measured as instantaneous gusts) make dust control extremely difficult.

- 4.3.6.2H In order to reduce particulate matter emissions during construction, the project applicant shall require soil stockpiled for more than two days to be covered, kept moist, or treated with soil binders to prevent dust generation.
- 4.3.6.2I In order to reduce particulate matter emissions during construction, the project applicant/contractor shall reduce "spill-over" effects by preventing soil erosion, washing dirt from vehicles entering public roadways, and washing/sweeping project access to public roadways on a regular schedule. All streets shall be swept once a day if visible soil materials are carried to adjacent streets. Wheel washers shall be installed where vehicles enter and exit unpaved roads onto paved roads. Street sweepers shall comply with SCAQMD Rule 1186. This mitigation measure incorporates the applicable provisions identified in Rule 403 regarding street sweeping and wheel washing.
- 4.3.6.2J In order to reduce particulate matter emissions during construction, the project applicant shall require all trucks hauling dirt, sand, sand, soil, or other loose materials be covered or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114. This mitigation measure incorporates the applicable provisions identified in Rule 403 regarding covering of trucks and maintenance of freeboard.
- 4.3.6.2K The project proponent shall appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues in relation to PM10 generation. Signage with this contact information shall be made available for each phase site.
- 4.3.6.2L In order to reduce particulate matter emissions during construction, the project applicant/contractor shall apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces.
- 4.3.6.2M Prior to the issuance of grading permits for each development site, the project developer shall submit to the SCAQMD, SCAQMD Rule 403 Form 403N (Large Operation Notification Form) and contact SCAQMD engineering and compliance staff.

Even with the implementation of the proposed mitigation measures and adherence to SCAQMD Rule 403 for fugitive dust, the EIR found the Original Project's emissions of VOC, NO_X CO, PM₁₀ and PM_{2.5} during construction would exceed all SCAQMD threshold and impacts would remain significant and unavoidable. The EIR also concluded that the Original Project would result in localized construction emissions of nitrogen dioxide (NO₂), PM₁₀ and PM_{2.5} above applicable thresholds of significance, even after mitigation. Accordingly, the EIR identified a significant and unavoidable impact relating to temporary construction period impacts on air quality.

Development of the Project would result in the same general disturbance area analyzed for the Site under the Original Project (i.e., the Project is proposed on the same 201-acre Site and the off-site sewer improvements are proposed on the same alignment along Goetz Road to Ethanac Road). Further, the Project would result in the development of the Site with same use as proposed under the Original Project; however, the Project proposes less development. Specifically, the Project would provide a 103,517-square-foot reduction in total building area constructed when compared to the Original Project. Furthermore, the off-site sewer improvements proposed by the Project would result in less trenching activities, since the previously certified EIR assumed sewer lines would be installed from the Site to Case Road and the Project would install sewer lines from the Site south along Goetz Road to Ethanac Road, resulting in less linear feet of sewer improvements. Thus, the short-term construction emissions are determined to be similar – and incrementally reduced – when compared to the Original Project. The short-term construction emissions are also anticipated to be less than the emissions disclosed and analyzed in the EIR due to the implementation of newer and cleaner off-road equipment that has been developed in the decade since the EIR was certified. However, while the construction of the Project would likely result in less emissions of all criteria pollutants, it is assumed that like the Original Project, construction of the Project would still exceed SCAQMD regional construction thresholds for all criteria pollutants except SO₂ and would exceed localized thresholds for NO_X, PM₁₀ or PM_{2.5} after implementation of Mitigation Measures 4.3.6.1A through 4.3.6.2M (EIR, pp. 4.3-56-59; 4.3-69). The Project applicant would be required to implement all applicable mitigation measures imposed on the Original Project by the EIR, including those set forth above, and would also be subject to the same or more stringent regulatory requirements, as such requirements have generally become more strict since the time that EIR was certified (thereby reducing a greater amount of fugitive dust and other emissions), meaning that the EIR disclosed and analyzed greater impacts under the then-existing regulations. Further, the development intensity other aspect of the Original Project, such as Phase 3, has also been reduced.

In light of the above, the Project would not result in any new or increased significant short-term impacts on air quality that were not already analyzed in, and fully covered by, the previously certified EIR.

Long Term Operational Impacts

The EIR identified significant impacts on air quality resulting from the operation of the buildout of the Original Project, which included emissions of criteria pollutants VOC, CO, NO_X, PM₁₀ and PM_{2.5} above SCAQMD thresholds of significance and localized emissions of PM₁₀ and PM_{2.5} above applicable thresholds of significance.

The EIR proposed several mitigation measures, which were adopted as follows:

4.3.6.3A In order to reduce the project's operation diesel particulate matter emissions, prior to the issuance of building permits, the project applicant shall require by contract specifications that signs shall be posted on the site in loading bay areas informing truck drivers of the California Air Resources Board regulations that limit truck idling to no more than five (5) minutes, both on- and off-site. Contract specifications shall be included in the proposed project construction

documents, which shall apply to the developer/successor-in-interest and shall be reviewed by the City.

- 4.3.6.3B In order to reduce the project's operational diesel particulate matter emissions, prior to the issuance of building permits, the project applicant shall require by contract specifications that electrical hook-ups shall be installed in loading bay areas to eliminate unnecessary idling of main and auxiliary truck engines. Contract specifications shall be included in the proposed project construction documents, which shall apply to the developer/successor-in-interest and shall be reviewed by the City.
- 4.3.6.3C In order to reduce the project's operational diesel particulate matter emissions, prior to issuance of building permits, the project applicant shall require by contract specifications that all on-site forklifts and other equipment will not be diesel-powered, but required to be electric or some other type of low-emission technology available at the time of development. Contract specifications shall be included in the proposed project construction documents, which shall apply to the developer/successor-in-interest and shall be reviewed by the City.
- 4.3.6.3D As part of the building plan approval, the project proponent shall include energy efficient measures that exceed California Title 24 standards by 30 percent for all buildings. Energy efficient measures may include (but are not limited to):
 - Installation of efficient lighting and lighting control systems (electronic dimming ballasts and computer-controlled daylight sensors, low-mercury bulbs, and bulb reduction);
 - Use of daylight as an integral part of lighting systems in buildings (e.g., skylights);
 - Installation of light colored "cool" roofs, cool pavements, and strategically placed shade trees;
 - Provision of information on energy management services for large energy users;
 - Installation of energy efficient heating and cooling systems, appliances and equipment, and control systems; and
 - Installation of light emitting diodes (LEDs) for exterior signs and landscaping; and limiting the hours of operation of outdoor lighting.
- 4.3.6.3E As part of building plan approval, the project proponent shall accommodate renewable energy facilities. The project shall be structurally designed to be ready to accept the installation of solar and/or wind power systems (subject to Southern California Edison's program), solar and/or tankless hot water heaters, and energy-efficient heating ventilation and air conditioning (HVAC). Additionally, the project proponent shall educate consumers about existing incentives.
- 4.3.6.3F As part of building plan approval, the project proponent shall include transportation and motor vehicle reduction measures. Transportation and motor

vehicle reduction measures shall apply to the developer/successor-in-interest and shall include (but are not limited to):

- Limit idling time for commercial vehicles, including delivery and construction vehicles, to five minutes or less, both on- and off-site;
- Use low or zero-emission vehicles, including construction vehicles;
- Require implementation of ride sharing programs (e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride sharing vehicles, and providing a web site or message board for coordinating rides for all initial and future occupants.
- For large employers (employers who employ 250 or more employees), provide facilities that encourage bicycle commuting, including (e.g., locked bicycle storage or covered or indoor bicycle parking); and
- Create bicycle lanes and walking paths directed to the location of schools, parks, and other destination points.
- 4.3.6.3G As part of building plan approval, the project proponent shall include the following project design and operational/health effect measures:
 - Project-generated trucks servicing the proposed project shall be restricted
 from residential areas and schools and, a specific truck route shall be
 delineated on the circulation/transportation plan, implemented with the use
 of signage, to direct project-related trucks away from sensitive receptors
 (i.e., ensure that trucks will not enter residential areas or pass by other
 sensitive receptor areas);
 - Design the warehouse/distribution center and any future expansion such that there are no trucks queuing outside each facility;
 - Post signs outside of each facility providing a phone number where neighbors can call if there is a specific issue; and
 - Improve traffic flow by signal synchronization.

Even with the implementation of the proposed mitigation measures, the EIR found that it was not possible to quantify the reduction in the amount of emissions that may occur, and considering the volume of emissions generated and consumer habits, the EIR determined it unlikely that identified mitigation measures would result in the reduction of operational project emissions to below SCAQMD levels. In the absence of mitigation to reduce the Original Project's emission of VOC, CO, NO_X, PM₁₀, and PM_{2.5} to below SCAQMD thresholds, the EIR concluded and disclosed that the emissions of the foregoing criteria pollutants remained significant and unavoidable.

The EIR also concluded that the Original Project would not result in significant impacts related to consistency with the adopted AQMP, long term CO hotspot impacts, health risks, odors, or imported soil emissions.

For the Project, the long-term operational emissions were modeled using the current California Emissions Estimator Model (CalEEMod) version 2022.1 program based on the land use and traffic assumptions evaluated in the Traffic Generation Analysis and VMT Analysis, attached hereto as

Appendices 8 and 9. (*See*, Appendix 1, Air Quality and GHG Assessment (Urban Crossroads, 2023a)) The air quality analysis utilized the land use and traffic information and data provided in in this Addendum and specifically Section 7.Q (Transportation) herein.

The results of the analysis are shown in Table 7.C.1, Project Maximum Daily Operation Emissions. As shown in Table 7.C.2, Operational Emissions Comparison, the VOC, NO_X, CO, SO₂, PM₁₀, and PM2.5 emissions for the Project would be lower than the emissions calculated for the Original Project in the EIR using the previous URBEMIS air quality model. Although the criteria pollutant emissions from the Project would exceed daily thresholds of significance for VOC, NO_X, and CO, they would do so to a substantially lesser degree than the Original Project as evaluated in the EIR, which also exceeded the daily thresholds of significance.

Table 7.C.1 Project Maximum Daily Operation Emissions

| Common | Emissions (lbs/day) | | | | | | | | |
|--------------------------------------|---------------------|--------|--------|--------|-----------|-------------------|--|--|--|
| Source | VOC | NO_X | CO | SO_X | PM_{10} | PM _{2.5} | | | |
| | S | Summer | | | | | | | |
| Mobile Source | 20.50 | 82.70 | 298.00 | 1.19 | 75.60 | 20.30 | | | |
| Area Source | 104.00 | 1.23 | 145.00 | 0.01 | 0.26 | 0.20 | | | |
| Energy Source | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | | |
| On-Site Equipment Source | 1.41 | 4.50 | 197.34 | 0.00 | 0.35 | 0.32 | | | |
| Total Maximum Daily Emissions | 125.91 | 88.43 | 640.34 | 1.20 | 76.21 | 20.82 | | | |
| SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 | | | |
| Threshold Exceeded? | YES | YES | YES | NO | NO | NO | | | |
| | | Winter | | | | | | | |
| Mobile Source | 19.60 | 87.20 | 244.00 | 1.15 | 75.60 | 20.30 | | | |
| Area Source | 80.50 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | | |
| Energy Source | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | | |
| On-Site Equipment Source | 1.41 | 4.50 | 197.34 | 0.00 | 0.35 | 0.32 | | | |
| Total Maximum Daily Emissions | 101.51 | 91.70 | 441.34 | 1.15 | 79.95 | 20.62 | | | |
| SCAQMD Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 | | | |
| Threshold Exceeded? | YES | YES | NO | NO | NO | NO | | | |

Source: (Urban Crossroads, 2023a)

Table 7.C.2, Operational Emissions Comparison

| Source | | Emissions (lbs/day) | | | | | | |
|--------------------|---------|---------------------|-----------|--------|-----------|------------|--|--|
| Source | VOC | NO_X | CO | SO_X | PM_{10} | $PM_{2.5}$ | | |
| | | Summer | • | | | | | |
| Currently Approved | 257.88 | 1,663.29 | 1,718.07 | 6.12 | 416.33 | 129.46 | | |
| Project | 125.91 | 88.43 | 640.34 | 1.20 | 76.21 | 20.82 | | |
| Net Difference | -131.97 | -1,574.86 | -1,077.73 | -4.92 | -340.12 | -108.64 | | |
| | • | Winter | | • | • | • | | |
| Currently Approved | 266.39 | 1,752.70 | 1,599.95 | 5.77 | 416.33 | 129.46 | | |
| Project | 101.21 | 77.70 | 441.34 | 1.15 | 79.95 | 20.62 | | |
| Net Difference | -164.88 | -1,661.00 | -1,158.61 | -4.62 | -340.38 | -108.84 | | |

Source: (Urban Crossroads, 2023a)

The emissions shown in Table 7.C.2 are not a direct comparison because of the use of the two different air quality models. However, the Project would result in less development square footage;

as such, the Project would result in an actual reduction in operational emissions and associated traffic generation from the Site when compared to the Original Project on the Site. Additionally, the Project would be subject to updated regulations that are more protective of the environment when compared to the regulations that existed when the Original Project was approved and the EIR was certified. The emissions reductions provided by the Project would not be sufficient to avoid the significant and unavoidable cumulative impact that was disclosed in the previously certified EIR. However, like the Original Project, the Project would result in significant impacts from emissions of VOC, NO_X, and CO even after implementation of all feasible mitigation measures imposed on the Original Project, but to a lesser degree than the Original Project.

Carcinogenic and Chronic Project-Related Emission Impacts

The EIR also disclosed and analyzed potentially significant impacts related to health risk from diesel particulate matter (DPM) emissions from trucks, warehousing operations and locomotives using rail, including impacts on nearby sensitive receptors. In an effort to reduce the carcinogenic and non-carcinogenic chronic project-related emissions impacts, the EIR proposed several mitigation measures, which were adopted as follows:

- 4.3.6.6A In order to reduce the project's operational DPM emissions, signs shall be posted on the site in loading bay areas informing truck drivers of the California Air Resources Board regulations that limit truck idling to no more than 5 minutes.
- 4.3.6.6B In order to reduce the project's operational DPM emissions, electrical hook-ups shall be installed in loading bay areas to eliminate unnecessary idling of main and auxiliary truck engines.
- 4.3.6.6C In order to reduce the project's operational DPM emissions, all on-site forklifts shall not be diesel powered.
- 4.3.6.6D If the locomotives that serve the Phase 2 site are not equipped with anti-idling devices, an idling restriction shall be enforced by developer/successor-in-interest. Locomotives not equipped with anti-idling devices shall be manually limited to no more than 15 consecutive minutes of idling.
- 4.3.6.6E The developer/successor-in-interest for the Phase 2 site shall establish a complaint line for complaints regarding smoke, noise, and idling in excess of 15 minutes for locomotives idling on the Phase 2 site. This complaint line shall be a toll free 1-800 number and posted on signs within the Phase 2 site.

The EIR concluded that after the implementation of the foregoing mitigation measures, the Original Project's impacts on carcinogenic and chronic project-related emissions impacts would be reduced to less than significant levels. It bears noting that no rail spur is proposed as part of the Project, and thus Mitigation Measures 4.3.6.6D and 4.3.6.6E do not apply.

The Project would not result in new or increased impacts on health risk when compared to the impacts of the Original Project analyzed in the EIR. All significant carcinogenic and chronic

project-related impacts identified by the EIR would result from the use of large, heavy-duty diesel-powered equipment, forklifts, train engines, and warehouse equipment for delivering and moving supplies during operation of the Original Project. The Project would not increase the use of warehouse industrial equipment at the Site. Instead, the Project would result in reduced square footage, reducing impacts resulting from industrial warehouse operations related to delivering and moving supplies, and therefore reducing potential health risks.

Specifically, impacts related to cancer and non-cancer risks from DPM due to Project-generated truck trips are anticipated to be slightly reduced because the Project's total daily truck trip volumes would be slightly reduced due the reduction in warehouse square footage when compared to the Original Project. More specifically, as shown in Tables 7.O.1 and 7.O.2 in Section 7.O. (Transportation) herein and Appendix 8, the total daily truck trips generated by the Project would be 738, whereas the Original Project's total daily truck trips for Phase 2 would have been 762 trips. The Project therefore represents a reduction of 24 truck trips. As the cancer and non-cancer risk is based on diesel truck emissions, fewer trucks accessing the Site under Project would not result in greater emissions than the Original Project evaluated in the EIR and, therefore, would not increase cancer or non-cancer risk. Instead, the Project would incrementally reduce potential health risk impacts. Further, since the certification of the EIR, applicable regulatory requirements protecting human health, including standards for truck emissions, have become stricter (e.g., 2010 truck restrictions take effect in 2023 thereby greatly reducing the operational emissions of truck fleets), which would also reduce emissions when compared to the emissions the EIR assumed would result from the Original Project under then-existing regulations. This would be true even if the Project proposed to develop the same amount of square footage as the Original Project, which it does not. Finally, as noted above, the impacts of the development of the other phases of the Original Project would also be lessened as a result of these regulations, and Phase 3 is being developed with over 300,000 SF less than was assumed by the EIR.

The Project would develop the Site with the same use as proposed under the Original Project; however, the proposed development would be less incentive when compared to the Original Project and the Project would be subject to more stringent regulations (including improved truck emissions). As such, all impacts on air quality would generally be reduced when compared to the impacts of the development and operation of the Site permitted by Original Project and assumed and analyzed in the EIR.

Accordingly, based on the information and analysis set forth above and in Appendix 1, the Project would not result in any new or increased significant impacts on air quality, including impacts related to health risks, that were not already analyzed in, and fully covered by, the previously certified EIR.

7.D <u>Biological Resources</u>

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

The EIR found that the Original Project had potentially significant impacts on Jurisdictional Waters/Wetlands. To reduce such impacts, the EIR proposed the following mitigation measures:

4.4.6.1A Prior to the issuance of grading permits for the affected areas, the project applicant shall provide evidence to the City that a Section 404 Permit from the ACOE, a Section 401 Permit from the RWQCB, and a Section 1602 Streambed

Alteration Agreement from the CDFG [now CDFW] have been obtained for jurisdictional waters on each of the sites.

4.4.6.1B Prior to the issuance of grading permits for the affected areas, the project applicant shall compensate for the loss of jurisdictional resources by creating non-wetland waters of the U.S./Streambed as directed through consultation with the ACOE and the [CDFW].

The EIR concluded that after mitigation, the Original Project's impacts on jurisdictional resources would be reduced to a less than significant level. The EIR assumed that the Site would be fully developed as part the Original Project and the same Phase 2 Site would be developed by the Project. Additionally, as a result of onsite improvements as well as the offsite improvements (including offsite improvements along Goetz Road to Ethanac Road) required by the City, the Project may result in impacts to additional jurisdictional waters that were not expressly identified in the EIR; however, these required improvements are nonetheless consistent with the improvements that the EIR assumed would occur and would be mitigated to a less than significant level with the mitigation measures set forth in the previously certified EIR. The Project is required to implement all applicable mitigation measures set forth in the EIR, including all mitigation relating to potential impacts on jurisdictional waters, if applicable – which require the Project currently proposed to obtain all required permits from the United States Army Corps of Engineers (ACOE), the Regional Water Quality Control Board (RWQCB), and the California Department of Fish and Wildlife (CDFW) prior to development. After compliance with these mitigation measures, the Project would not result in any significant impacts to biological resources generally, or to jurisdictional waters specifically. As a result, the Project would not result in any new or increased impact that was not already analyzed in, and fully covered by, the previously certified EIR.

The EIR also found that the Original Project would also result in potentially significant impacts on special status bird species, including the burrowing owl, California horned lark, and the loggerhead shrike. In order to reduce such impacts, the EIR imposed the following mitigation measures (as modified for clarification):

- 4.4.6.2A The clearance of vegetation within the biological study area (BSA) that supports special status species or protected avian species, as identified in mitigation measure 4.4.6.2C, shall not occur within the typical avian nesting season (March 1 to June 30), subject to mitigation measure 4.4.6.2E.
- 4.4.6.2B Access to proposed development sites shall be via existing routes, or shall be limited to the minimum extent/length required to provide safe and timely access. Known occupied burrows within the BSA, but outside the proposed development sites shall be avoided.
- 4.4.6.2.C No more than 72 hours prior to initiation of ground-disturbing activities, a preconstruction nesting bird_survey shall be completed by a qualified biologist. The survey will identify (if any) special status avian species within the area of intended disturbance. In the event no special status avian species are identified within the limits of disturbance, no further mitigation is required. In the event

such species are identified within the limits of ground disturbance, Mitigation Measure 4.4.6.2.E shall apply.

- 4.4.6.2D No more than 30 days prior to initiation of ground-disturbing activities, a preconstruction burrowing owl survey shall be completed by a qualified biologist for the planned disturbance area and a 500-foot (150-meter) buffer area. The pre-construction burrowing owl surveys may be conducted as part of the survey required in Mitigation Measure 4.4.6.2.C. A report detailing the findings of the pre-construction survey shall be submitted to the City prior to the initiation of ground-disturbing activities. In the event no burrowing owls have been identified within the limits of disturbance, no further mitigation is required. In the event burrowing owls are identified within the limits of ground disturbance, Mitigation Measures 4.4.6.2.E and 4.4.6.2.F shall apply.
- 4.4.6.2E If nesting avian species are determined to occupy a proposed area of disturbance, no construction activity shall take place within 500 feet of an active nest/burrow until it has been determined that the nest/burrow is no longer active, and all juveniles have fledged the nest/burrow.
- 4.4.6.2F If active burrowing owl burrows are detected outside the breeding season, then passive and/or active relocation may be approved following consultation with RCA, CDFG and/or USFWS. The installation of one-way doors may be installed as part of a passive relocation program. Burrowing owl burrows shall be excavated with hand tools by a qualified biologist when determined to be unoccupied, and back filled to ensure that animals do not re-enter the holes/dens. If burrowing owls have colonized the project site prior to the initiation of ground-disturbing activities, the project proponent will immediately inform the RCA and the Wildlife Agencies and will need to coordinate further with the RCA and the Wildlife Agencies, including the possibility of preparing a Burrowing Owl Protection and Relocation Plan, prior to initiating ground disturbance. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl has not colonized the site since it was last disturbed. If burrowing owls are found, the same coordination described above will be necessary.

The EIR concluded that after mitigation, the Original Project's impacts on migratory bird species and non-listed special status avian species would be reduced to a less than significant level. The EIR assumed that the Site would be developed by the Original Project, which is the same Site proposed to be developed by the Project. Accordingly, the Project would not result in any new or increased impacts on the special status species when compared to the Original Project or would otherwise result in any impacts not already analyzed in the EIR.

Joint Project Review (JPR 09-04-24-01) was completed for the Original Project in 2009, with the Regional Conservation Authority (RCA) issuing JPR Findings on August 31, 2009. Because the Original Project JPR covered three separate projects, including the PLC South Project, the project developer proposes to amend JPR 09-04-24-01 to remove the PLC South Project from that Original

Project JPR, and a new JPR would be processed to cover the PLC South Project, including the onsite portion that was evaluated as part of the Original Project, as well as the new offsite improvements. Furthermore, the Original Project did not require a Determination of Biologically Equivalent or Superior Preservation (DBESP) in 2009, because impacts to MSHCP resources had not been identified at the time that the Original Project JPR was processed. However, the onsite portion of the Project does contain a MSHCP riverine feature that would be impacted. Pursuant to Section 6.1.2 of the MSHCP, projects are required to evaluate impacts to MSHCP riparian/riverine areas and vernal pools, as well as certain species associated with riparian habitats and vernal pools and other seasonally ponded features, including the least Bell's vireo (Vireo bellii pusillus), southwestern willow flycatcher (Empidonax traillii extimus), western yellow-billed cuckoo (Coccyzus americanus), and listed fairy shrimp. The Project would impact the single unvegetated riverine feature within the onsite portion, but the Project would not remove habitat that supports the riparian bird species. In addition, the Project would not impact vernal pools and would not impact habitat with the potential to support listed fairy shrimp, including vernal pools and other seasonally ponded depressions. However, impacts to the single riverine feature would require approval of a DBESP and this requirement would be enforced through a condition of approval. It is understood that the JPR review may result in changes to the biological resources mitigation measures adopted for the Original Project. The following condition of approval would be required to ensure compliance with MSHCP Section 6.1.2 for the implementation of the Project relative to the JPR and DBESP processes:

Prior to the issuance of grading permits, the project developer shall complete the JPR process for the Project and will through the City/RCA submit a DBESP Analysis to the Wildlife Agencies (U.S. Fish and Wildlife Service and California Department of Fish and Wildlife) for review and approval to address impacts to riparian/riverine areas.

Further, in addition to Section 6.1.2 resources, the implementation of the Project must demonstrate consistency with the species and habitat requirements pursuant to Section 6.1.3 (Narrow Endemic Plants) and Section 6.3.2 (Additional Survey Needs and Procedures) of the MSHCP. Both the onsite portion of the Project as well as the offsite improvements are located within the Narrow Endemic Plant Species Survey Area (NEPSSA), the Criteria Area Plant Species Survey Area (CAPSSA), and the burrowing owl survey area. If applicable species were to be detected and if the development of the Project could not avoid at least 90 percent of areas with long-term conservation value for those species, then a DBESP would be required, including mitigation to offset impacts. However, none of the applicable species have been detected within the improvement areas and/or suitable habitat does not exist for one or more species. None of the applicable target species (Narrow Endemic Plants, Criteria Area Plants or burrowing owls) were detected within the onsite portion (and portions of the offsite improvements) during updated surveys performed in 2022, including the onsite improvement areas and portions of the offsite improvements. Additional offsite improvements required by the City are not expected to support any of the applicable species due to a lack of suitable habitat. However, if any applicable plant species or burrowing owls were to be detected within the Project's disturbance limits, and suitable habitat areas could not be avoided, then the Project's DBESP would also need to address impacts and mitigation for those applicable species. All of the foregoing would be imposed on the Project through detailed City conditions of approval, when approving the proposed modification to the Original Project. In order to ensure the Project's compliance with RCA and City requirements, the

following conditional of approval would be required for implementation of the Project as it pertains to sensitive plants and burrowing owls:

Prior to the issuance of grading permits, the project developer shall evaluate impacts to applicable Narrow Endemic Plants and Criteria Area Plants, and burrowing owls. If required, the project developer will through the City/RCA submit a DBESP analysis to the Wildlife Agencies (U.S. Fish and Wildlife Service and California Department of Fish and Wildlife) for review and approval. The DBESP analysis will identify specific mitigation and monitoring protocols, including success criteria.

With the imposition of the proposed condition(s) of approval and mitigation measures, the Project would not result in any significant impacts on biology, and therefore would not result in any new or increased significant impacts on biological resources that were not already analyzed in, and covered by, the previously certified EIR.

7.E <u>Cultural Resources</u>

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis | | | |
|----------|---|------------------------------|---------------------------|--|---|--|--|--|
| Would to | Would the project: | | | | | | | |
| a. | Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5? | | | | \boxtimes | | | |
| b. | Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? | | | | X | | | |
| c. | Disturb any human remains, including those interred outside of dedicated cemeteries? | | | | × | | | |

The EIR disclosed and analyzed all potential impacts on cultural resources, including paleontological resources (refer to the discussion under Section 7.G), historical resources, archaeological resources and human remains. The EIR disclosed that the Site was historically used for agricultural production, and there are no known cultural resources; nonetheless the previously certified EIR assumed impacts were potentially significant and imposed the following mitigation measures:

- 4.5.5.1A In the event of the accidental discovery or recognition of any human remains on the project, the following steps shall be taken:
 - There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:

- The coroner of the county in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and
- o If the coroner determines the remains to be Native American:
 - The coroner shall contact the NAHC within 24 hours.
 - The NAHC shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
 - The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, or
 - Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further and future subsurface disturbance pursuant to Public Resources Code Section 5097.98(e).
- The NAHC is unable to identify a most likely descendent.
- The most likely descendant is identified by the NAHC, fails to make a recommendation within 48 hours of being granted access to the site; or
- The landowner or his authorized representative rejects the recommendation of the descendant, and a mediation by the NAHC fails to provide measures acceptable to the landowner.
- 4.5.5.2A Prior to grading of the project site, the project developer shall hire a qualified archaeologist to provide cultural resource monitoring services at the project site. Selection of the archaeologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the site until the archaeologist has been approved by the City. During grading activities, the archaeologist shall monitor earth moving activities at the project sites consistent with Public Resources Code Section 21083.2(b), (c), and (d). The archaeologist shall be equipped to record and salvage cultural resources that may be unearthed during grading activities. The archaeologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. If the archaeologist identifies resources of a prehistoric or Native American origin, a Native American observer shall be added to the monitoring program and accompany the archaeologist for the duration of the grading phase. Any Native American resources shall be evaluated in accordance with the State CEQA Guidelines and either reburied at the project sites or curated at an accredited facility approved by the City of Perris. Once grading activities have ceased or the archaeologist determines that monitoring is no longer necessary, monitoring activities can be discontinued.

The Project would be required to comply with all the foregoing mitigation measures, as applicable, including for offsite construction (proposed realignment of an existing sewer main). The Project's proposed buildings would not result in the development of property outside of the boundaries of the Site previously analyzed by the EIR.

It should be noted that the Project proposes the realignment of a sewer main located within portions of Goetz Road. BFSA Environmental Services (BFSA) (included as Appendix 2) conducted an inhouse records search that utilized the results of the records search from the Eastern Information Center at California State University, Riverside for the Perris Airport Project (BFSA, 2022a). The records search encompassed a one-mile radius surrounding the boundaries of the proposed realignment.

Based upon the records search results conducted by BFSA, 11 resources have been recorded within one mile of the project, none of the resources are within the boundaries. However, one prehistoric resource, a surface scatter of 15 pieces of flaked stone, recorded as CA-RIV-000805, lies directly adjacent to the 20-foot buffer surrounding the northwestern portion of Case Road. Other resources within the search radius include a historic railroad track alignment, a historic foundation, a historic transmission line alignment, and lithic scatters.

Accordingly, the Project would not result in any new or increased significant impacts on cultural resources that were not already analyzed in, and covered by, the previously certified EIR.

7.F Energy

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis | | |
|----------|--|------------------------------|---------------------------|--|---|--|--|
| Would th | Would the project: | | | | | | |
| a. | Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | | | | × | | |
| b. | Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | | | | × | | |

The Project includes the same type of industrial warehouse uses approved for the Original Project and would result in the construction and operation of less square footage than what was approved for the Original Project. As a result, the Project would use less energy when compared to the Original Project and would result in less impacts analyzed in the EIR. As part of its global climate change analysis in Section 4.3 (Air Quality), the EIR concluded that the Original Project would not result in any significant impacts related to inefficient, wasteful or necessary consumption of energy. Because the Project would use less energy than the Original Project – and would be subject

to more strict regulations regarding energy usage than existed when the Original Project was approved and the EIR was certified – that conclusion would remain the same.

Accordingly, the Project would not result in any new or increased significant impacts on energy that were not already analyzed in, and fully covered by, the previously certified EIR. Instead, the Project would reduce impacts on energy when compared to the Original Project.

7.G Geology and Soils

| | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|--|------------------------------|---------------------------|--|---|
| Would the project: | | | | |
| a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | \boxtimes |
| i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ? | | | | × |
| ii. Strong seismic ground shaking? | | | | × |
| iii. Seismic-related ground failure, including liquefaction? | | | | × |
| b. Result in substantial soil erosion or the loss of topsoil? | | | | × |
| c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onor off-site landslide, lateral spreading subsidence, liquefaction or collapse? | | | | X |
| d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? | | | | × |
| e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | | | | × |

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|----|--|------------------------------|---------------------------|--|---|
| f. | Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | | | | \boxtimes |

The EIR concluded that, based on the Initial Study prepared by the City and attached to the EIR as Appendix A, all the Original Project's impacts on geology and soils were less than significant without mitigation, and did not warrant detailed discussion in the EIR.

The Project's proposed buildings would not result in the development of property outside of the same Site previously analyzed by the EIR; one of the three project sites analyzed therein. Additionally, State Building Codes and other applicable regulatory requirements with which the Project must comply with have been strengthened to be more protective against earthquakes and other seismic activity since the time the EIR was certified. As such, impacts related to geology and soils would be reduced when compared to the impacts of the Original Project assumed by the Initial Study/EIR.

Accordingly, the Project would not result in any new or increased significant impacts related to geology and soils that were not already analyzed in, and fully covered by, the previously certified EIR.

The EIR disclosed and analyzed all potential impacts on paleontological resources. The previously certified EIR assumed impacts were potentially significant and imposed the following mitigation measures:

- 4.5.5.3A Prior to the issuance of grading permits, the project proponent shall submit to and receive approval from the City, a Paleontological Resource Impact Mitigation Program (PRIMP). The PRIMP shall include the provision of a trained paleontological monitor during on-site soil disturbance activities. The monitoring for paleontological resources shall be conducted on a half-time basis during the rough-grading phase of the project. In the event that paleontological resources are unearthed or discovered during excavation, Mitigation Measure 4.5.5.3C shall apply. Conversely, if no paleontological resources are unearthed or discovered on site during excavation, no additional mitigation is required.
- 4.5.5.3B The paleontological monitor shall be equipped to rapidly remove any large fossil specimens encountered during excavation. During monitoring, samples of soil shall be collected and processed to recover microvertebrate fossils. Processing shall include wet screen washing and microscopic examination of the residual materials to identify small vertebrate remains.

- 4.5.5.3C If paleontological resources are unearthed or discovered during excavation of the project site, the monitoring for paleontological resources shall be conducted on a fulltime basis for the duration of the rough-grading of the project site. The following recovery processes shall apply:
 - Upon encountering a large deposit of bone, salvage of all bone in the area shall be conducted with additional field staff and in accordance with modern paleontological techniques.
 - All fossils collected during the project shall be prepared to a reasonable point of identification. Excess sediment or matrix shall be removed from the specimens to reduce the bulk and cost of storage. Itemized catalogs of all material collected and identified shall be provided to the museum repository along with the specimens.
 - A report documenting the results of the monitoring and salvage activities and the significance of the fossils shall be prepared.
 - All fossils collected during this work, along with the itemized inventory of these specimens, shall be deposited in a museum repository (such as the Western Science Center or the Riverside Metropolitan Museum), for permanent curation and storage.

A Paleontological Resources Assessment was prepared for the proposed sewer realignment portion of the Project by BFSA (included as Appendix 3). According to the Paleontological Resources Assessment, the boundaries of the proposed sewer realignment are within an area with a paleontological sensitivity ranging from "low to high" based on the presence of Pleistocene older alluvial deposits (high sensitivity) underlying young alluvium at the surface (low sensitivity) (Area 5) (BFSA, 2022b). The eastern-most quarter mile of the realignment falls in Area 2, which is assigned a "high" paleontological sensitivity, based on the presence of the Pleistocene older alluvial fan deposits mapped at the surface.

BFSA confirmed the existence of potentially fossiliferous Pleistocene alluvial fan deposits mapped as underlying the proposed boundaries of the proposed sewer realignment portion of the Project and the occurrence of terrestrial vertebrate fossils at shallow depths from Pleistocene older alluvial fan sediments across the Inland Empire of western Riverside County has been documented. Therefore, BFSA recommended full-time paleontological monitoring be performed for earth disturbance activities starting at the surface during earth disturbance activities when work is performed in Pleistocene-aged deposits that are mapped at the surface conforming with the intent of sensitivity guidelines by the City of Perris. Furthermore, full-time monitoring is recommended for earth disturbance activities starting at a depth of five feet below the surface during earth disturbance activities when work is performed in Holocene-aged deposits that are mapped at the surface. The Project's monitoring program would be required to comply with the performance standards established by previously certified EIR Mitigation Measure 4.5.5.3A. With compliance with applicable mitigation measures from the previously certified EIR related to paleontological resources, the Project would minimize the significance of the Project's effects to important paleontological resources to less than significant levels.

Accordingly, the Project would not result in any new or increased significant impacts related to paleontological resources that were not already analyzed in, and fully covered by, the previously certified EIR.

7.H Greenhouse Gas Emissions

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis | | |
|----------|---|------------------------------|---------------------------|--|---|--|--|
| Would th | Would the project: | | | | | | |
| a. | Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | | | | X | | |
| b. | Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | | | | × | | |

While located within the air quality section, the EIR nonetheless disclosed and analyzed the Original Project's potential impacts related to greenhouse gas ("GHG") emissions in the "Global Climate Change" subsection.

Limiting GHG emissions to combat climate change has been a governmental goal since the late 1970s. The regulation of GHGs ramped up in the 1990s – the United Nations Framework convention on Climate Change was signed in 1992, a 1995 meeting in Berlin defined a structure for further action, the Kyoto Protocol on Global Warming was executed in 1997. Under these agreements, many countries, including the United States, have pledged to lower GHG emissions. Since the 1990s, California's local governmental agencies have been well aware of the importance of monitoring and limiting GHG emissions when approving projects.

Executive Order ("EO") S-3-05 (June 2005) established the following statewide goals: GHG emissions should be reduced to 2000 levels by 2010, GHG emissions should be reduced to 1990 levels by 2020, and GHG emissions should be reduced to 80% below 1990 levels by 2050. In furtherance of the goals established in EO S-3-05, the Legislature enacted Assembly Bill ("AB") 32, the California Global Warming Solutions Act of 2006. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020. Under AB 32, the California Air Resources Board ("CARB") is responsible for and is recognized as having the expertise to carry out and develop the programs and requirements necessary to achieve the GHG emissions reduction mandate of AB 32. Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions from specified sources.

Senate Bill 375 (2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. SB 375 required the CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035. Regional

metropolitan planning organizations are then responsible for preparing a Sustainable Communities Strategy within their Regional Transportation Plan. The goal of the Sustainable Communities Strategy is to establish a forecasted development pattern for the region that, after considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets.

In connection with the EIR, URS Corporation completed an Air Quality Impact Report, which included a Greenhouse Gas Analysis that was attached to and incorporated in the EIR as Appendix C-2. That analysis concluded that the Original Project would result in direct and indirect emissions of 192,637 metric tons of CO₂e per year. Accordingly, the EIR concluded that potentially significant impacts related to GHG emissions may result from implementation of the Original Project. To reduce the potential GHG emissions resulting from implementation of the Original Project and in addition to other mitigation measures identified herein, the EIR imposed the following mitigation measures:

- 4.3.7.5A As part of the building plan approval, the project proponent shall include water conservation and efficiency measures. Water conservation and efficiency measures may include (but are not limited to):
 - Creation of water-efficient landscapes;
 - Installation of water-efficient irrigation systems and devices such as soil moisture-irrigation controls;
 - Use of reclaimed water for landscape irrigation in new developments and on public property including the installation of infrastructure to deliver and use reclaimed water;
 - Design buildings to be water-efficient including the installation of water-efficient fixtures and appliances;
 - Restricting water methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff;
 - Implementing low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment; and
 - Devising a comprehensive water conservation strategy appropriate for the project and location. The strategy may include many of the specific items listed above, plus other innovative measures that are appropriate to the specific project.
- 4.3.7.5B As part of building plan approval, the project proponent shall include solid waste reduction measures. Solid waste reduction measures may include (but are not limited to):
 - Reuse and recycle of construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard); and
 - Provision of interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas.
- 4.3.7.5C As part of building plan approval, the project proponent shall implement all applicable design features identified in Table 4.3.EE and 4.3.HH which include:

- Recycling and/or salvaging 75 percent of nonhazardous construction and demolition waste, and developing and implementing a construction waste management plan;
- Providing an easily accessible area that serves the entire building and is dedicated to the collection and storage of non-hazardous materials for recycling;
- Reducing the potable water consumption for irrigation by 50 percent;
- Maximizing water efficiency within the project resulting in a 30 percent reduction of water use, excluding irrigation, than the baseline after meeting Energy Policy Act of 1992 guidelines for fixture performance;
- Optimizing energy performance and achieving a 30 percent reduction in energy use;
- Providing preferred parking for low-emitting and fuel-efficient vehicles for
 5 percent of total vehicle parking;
- Providing secure bike racks or storage for 3 percent or more of all building users; and
- The project involves the use of a light-colored coating for the building rooftop.

Even with the implementation of the proposed mitigation measures, the EIR found that it was not possible to quantify the reduction in the amount of GHGs that may occur from implementation of these measures on the Original Project. The EIR found that the Original Project was consistent with strategies to reduce California's emissions consistent with EO S-3-05, and that the project specific incremental contribution to climate change at the project level would be less than significant with implementation of all the mitigation measures. However, even with implementation of the mitigation, the operational emissions of VOC, CO, and NOx, would continue to exceed the daily regional thresholds of significance recommended by the SCAQMD. Thus, the EIR concluded that the Original Project contribution to Statewide GHG impacts are cumulatively considerable, and remained a cumulatively considerable impact after mitigation.

The Project would result in construction and operation of less square footage than the previously certified EIR assumed would be constructed and operated on the Site, which both reduces construction and operation GHG emissions. The decreased square footage also further reduces GHG emissions by correspondingly reducing the amount of trips generated by the Project when compared with the Original Project and the traffic impacts that the EIR assumed would be generated, as set forth in Appendix 8. The Project's GHG emissions would be in the scope of the Original Project that was evaluated in the previously certified EIR. These reductions are in addition to the reduction already realized for the development of Phase 3. The Project would not increase the GHG emissions the EIR assumed would be generated by the construction and operation of the Original Project on the Site.

Additionally, mandatory regulatory requirements regarding operation of industrial facilities and vehicles, including trucks, which would apply to the Project, have become much stricter since the EIR was certified, like many regulations aimed at protecting the environment. This would result in an even further reduction in GHG emissions resulting from the Project when compared to the

GHG emissions that the EIR assumed would result from the Original Project under then-existing regulations.

The long-term operational GHG emissions from the Project were modeled using CalEEMod version 2022.1 based on the land use and traffic assumptions evaluated in Traffic Impact Analysis and the VMT Analysis attached hereto as Appendices 8 and 9. (*See*, Appendix 1, Air Quality and GHG Assessment (Urban Crossroads, 2023a)) The GHG analysis for the Project utilized the land use and traffic information and data provided in this Addendum and specific Section 7.Q (Transportation) herein.

A comparison of emissions for the Phase 2 Site between the certified EIR and this Project analysis is shown in Table 7.H.1, GHG Emissions Comparison. This is not a direct comparison because the emissions for the Original Project were estimated using a different methodology than the current CalEEMod. However, the Project would result in less development square footage; as such, the Project would result in an actual reduction in operational emissions and associated traffic generation from the Site when compared to the Original Project on the Site. Therefore, the Project's GHG impacts would be less than the impacts of the Original Project disclosed and evaluated in the previously certified EIR.

Table 7.H.1 GHG Emissions Comparison

| G | Emission (MT/yr) | | | |
|------------------|-------------------------|--|--|--|
| Source | Total CO ₂ e | | | |
| Original Project | 192,637.57 | | | |
| Project | 25,116.60 | | | |
| Net Difference | -167,520.97 | | | |

MT/yr = metric tons per year Source: (Urban Crossroads, 2023a)

Accordingly, the Project would not result in any new or increased significant impacts resulting from GHG emissions that were not already analyzed in, and fully covered by, the previously certified EIR. The Project would result in less development on the Site and would be subject to more stringent regulatory requirements; therefore, impacts from GHG emissions would generally be reduced from the impacts of the Original Project.

7.I Hazards and Hazardous Materials

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|----------|--|------------------------------|---------------------------|--|---|
| Would ti | he project: | | | | |
| a. | Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | | | | \boxtimes |
| b. | Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | | | | X |
| c. | Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | | | | × |
| d. | Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | | | | X |
| e. | For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | | | | × |
| f. | Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | | | | X |
| g. | Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | | | | × |

The EIR disclosed and analyzed all the potential impacts of the Original Project related to hazardous and hazardous materials, and found that the only potentially significant impacts relate to the Original Project's location within the Airport Compatibility Zone of the Perris Valley Airport and within the vicinity of the March Air Force Reserve Base ("MARB"). Following a May 14, 2009 Riverside County Airport Land Use Commission ("ALUC") hearing, ALUC determined that the Original Project was consistent with the applicable Airport Land Use Plan ("ALUP"), and

the EIR concluded the same, subject to certain conditions. Those conditions were incorporated into the EIR as mitigation measures, as follows:

- 4.6.6.1A Prior to recordation of a final map, the issuance of building permits, or conveyance to an entity exempt from the Subdivision Map Act for Phase 3, whichever occurs first, the landowner of the project site shall convey an avigation easement to the MARB/MIP Airport or provide documentation to the City of Perris and the Airport Land Use Commission that such conveyance has previously been recorded.
- 4.6.6.1B Prior to the issuance of building permits for each phase, the project proponent shall provide evidence to the City through submittal of a lighting plan that any outdoor lighting shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky and that all outdoor lighting is downward facing.
- 4.6.6.1C Prior to the issuance of building permits for each phase, the project proponent shall provide evidence to the City through submittal and agreement of additional conditions of approval that the following uses shall be prohibited on site:
 - Any use which would direct a steady light or flashing light of red, white, green or amber colors associates with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.
 - Any use which would cause sunlight to be reflected toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport.
 - 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.
 - Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.
- 4.6.6.1D Prior to the issuance of building permits for Phase 1, the applicant shall submit a Notice of Proposed Construction of Alteration (Form 7460-1) to the Federal Aviation Administration (FAA) for each building with an elevation at top point exceeding 1,427 feet AMSL and shall have received a determination of "No Hazard to Air Navigation" from the FAA. Copies of the FAA determination shall be provided to the City of Perris Planning Department and the Riverside County Airport Land Use Commission.
- 4.6.6.1E Prior to the issuance of building permits for Phase 3, the applicant shall submit a Notice of Proposed Construction of Alteration (Form 7460-1) to the Federal Aviation Administration (FAA) for each building with an elevation at top point

exceeding 1,424 feet AMSL and shall have received a determination of "No Hazard to Air Navigation" from the FAA. Copies of the FAA determination shall be provided to the City of Perris Planning Department and the Riverside County Airport Land Use Commission.

- 4.6.6.1F Prior to issuance of grading permits for each phase, the project proponent shall provide evidence to the City that the proposed on-site detention basins have been designed and engineered so as to provide for a maximum 48-hour detention period after the design storm and to remain totally dry between rainfalls. If this criterion cannot be met, then Mitigation Measure 4.6.6.1G shall apply. Conversely, if this criterion can be met, Mitigation Measure 4.6.6.1G shall not be applicable.
- 4.6.6.1G The project proponent, in consultation with the owner-operator of Perris Valley Airport, shall contract with a wildlife biologist qualified to conduct Wildlife Hazard Assessments for the preparation of a Wildlife Hazard Management Plan (WHMP). Mitigation measures identified in the WHMP shall be adhered to.
- 4.6.6.1H Prior to the issuance of occupancy permits for each phase, the project proponent shall provide evidence to the City that vegetation proposed for in and around the proposed detention/retention basins does not provide food or cover for bird species that would be incompatible with airport operations.
- 4.6.6.11 Prior to the transfer of any real property or the finalization of a lease agreement for property within each of the phases, the transferor (or leaser) shall provide to the transferee (or lessee), notification required by Condition 4 of the Riverside County Airport Land Use Commission's consistency determination dated May 14, 2009.

The EIR concluded that after these mitigation measures are implemented, the Original Project's impacts associated with airport hazards would be reduced to less than significant levels. As stated above, the EIR also concluded that all the Original Project's other impacts related to hazards and hazardous materials would be less than significant without mitigation. While Phase 1 of the Original Project is entirely inside Airport Compatibility Zone D, and Phase 3 is located partially in Zones D and E, the Site being analyzed here (Phase 2) is located completely outside all airport Influence Areas, including those established for Perris Valley Airport and March Air Reserve Base/Inland Port Airport. Thus, the foregoing mitigation measures that relate to airport hazards would not apply here.

The Project would not disturb any hazardous materials on Site or otherwise result in any impacts related to hazards and hazardous materials that were not already analyzed in the EIR. The uses proposed by the Project would be the same types of uses allowed by the Original Project — industrial warehouse uses — only less intense, and no additional hazardous materials would be used as part of these uses, other than those the previously certified EIR assumed would be part of the Original Project. After implementation of applicable mitigate measures, the conclusion for the Project would be the same as the EIR — all impacts associated with hazards would be reduced to less than significant levels after mitigation.

Accordingly, the Project would not result in any new or increased significant impacts resulting from hazards and hazardous materials that were not already analyzed in, and fully covered by, the previously certified EIR.

7.J Hydrology and Water Quality

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|----------|---|------------------------------|---------------------------|--|---|
| Would ti | he project: | | | | |
| a. | Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | | | | × |
| b. | Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin? | | | | |
| c. | Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: | | | | × |
| | i. result in substantial erosion or siltation on- or off-site; | | | | X |
| | ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; | | | | X |
| | iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or | | | | × |
| | iv. impede or redirect flood flows? | | | | \boxtimes |
| d. | In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | | | | X |
| e. | Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | | | | X |

Construction-Related Water Quality Impacts

The EIR identified potentially significant construction-related water quality impacts from the development of the Original Project. The impacts identified in the EIR included temporary disturbances of surface soils and removal of vegetative cover which could potentially result in erosion and sedimentation on site. Accordingly, the EIR identified several mitigation measures, which are as follows:

- 4.7.6.1A Prior to the first issuance of a grading permit by the City for each phase of the proposed project, the project applicant shall file a Notice of Intent (NOI) with the Santa Ana Regional Water Quality Control Board to be covered under the State National Pollutant Discharge Elimination System (NPDES) General Construction Permit for discharge of stormwater associated with construction activities.
- 4.7.6.1B Prior to the first issuance of a grading permit by the City for each phase of the project, the project applicant shall submit to and receive approval from the City of Perris a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP shall include a surface water control plan and erosion control plan citing specific measures to control on-site and off-site erosion during the entire grading and construction period. In addition, the SWPPP shall emphasize structural and nonstructural best management practices (BMPs) to control sediment and non-visible discharges from the site. Some of the BMPs to be implemented may include (but shall not be limited to) the following:
 - Sediment discharges from the site may be controlled by the following: sandbags, silt fences, straw wattle and temporary debris basins (if deemed necessary), and other discharge control devices. The construction and condition of the BMPs would be periodically inspected during construction, and repairs would be made when necessary as required by the SWPPP.
 - All materials that have the potential to contribute non-visible pollutants to stormwater must not be placed in drainage ways and must be contained, elevated, and placed in temporary storage containment areas.
 - All loose piles of soil, silt, clay, sand, debris, and other earthen material shall be protected in a reasonable manner to eliminate any discharge from the site. Stockpiles would be surrounded by silt fences and covered with plastic tarps.
 - The SWPPP would include inspection forms for routine monitoring of the site during the construction phase to ensure NPDES compliance.
 - Additional BMPs and erosion control measures would be documented in the SWPPP and utilized if necessary.
 - The SWPPP would be kept on site for the entire duration of project construction and will also be available to the local RWQCB for inspection at any time.

In the event that it is not feasible to implement the above BMPs, the City of Perris can make a determination that other BMPs would provide equivalent or superior treatment either on site or off site.

4.7.6.1C The Construction Contractor shall be responsible for performing and documenting the application of BMPs identified in the SWPPP. Weekly inspections shall be performed on sediment control measures called in for the SWPPP. Monthly reports shall be maintained by the Contractor and also available for City inspection. In addition, the Contractor would also be required to maintain an inspection log and have the log on site available for review by the City of Perris and the representatives of the Regional Water Quality Control Board.

The EIR concluded that adherence to the BMPs mandated by the mitigation measures would reduce impacts associated with the Original Project's short-term stormwater discharge to less than significant levels. The Project, which would involve similar construction activities on the same Site analyzed in the EIR, would be required to comply with these mitigation measures/BMPs and all other applicable regulatory requirements, and therefore impacts would also be less than significant.

Operational-Related Water Quality Impacts

The EIR also identified potentially significant water quality impacts from the operation of the Original Project. Specifically, the EIR disclosed that upon development of the on-site uses proposed by the Original Project, storm runoff from the roadways, parking lots, and commercial buildings can carry and be tainted by various pollutants such as sediment, petroleum products, construction materials, landscaping chemicals, and trace metals.

The EIR noted that adherence to the Water Quality Management Plan ("WQMP") requirements is required of all development within the City. In addition to these WQMP requirements, the EIR proposed the following mitigation measure:

4.7.6.2A Prior to the first issuance of a permit by the City (which includes the issuance of grading permits and building permits) for each phase, the project applicant shall be required to finalize the preliminary WQMP prepared for the project and receive approval from the City of Perris of the project-specific Final Water Quality Management Plan (WQMP) for each component of the proposed project. The Final WQMP shall specifically identify pollution prevention, source control, treatment control measures, and other BMPs that shall be used on the site to control predictable pollutant runoff in order to reduce impacts to water quality.

After implementation of the foregoing mitigation measure, and because adherence to the regulatory requirements identified in the WQMP prepared by Thienes Engineering, Inc. (Thienes) (Thienes, 2023a) (included as Appendix 4) would be required by the City during the operational phase of the Project, the EIR concluded the Original Project's potential water quality impacts resulting from stormwater and urban runoff would be reduced to a less than significant level. The

Project – which would involve similar (and less intense) industrial operations on the same Site analyzed in the EIR – would be required to comply with the same mitigation measures and all other applicable regulatory requirements, including the WQMP, and therefore all impacts would also be less than significant.

100-Year Flooding Hazard-Related Impacts

As requested by Riverside County Flood Control, the EIR discussed impacts related to the Project floodway and floodplain. The EIR identified potentially significant impacts resulting from (among other things), the Site's location within a 100-year floodplain as mapped by the Federal Emergency Management Agency ("FEMA") and its location adjacent to the San Jacinto River. Portions of the Phase 1 site, the Phase 2 site, and entire Phase 2 site are within a 100-year flood hazard area. The EIR observed that flooding in the City could result in rapid runoff through the failure of dams. In order to reduce these impacts, the EIR imposed the following mitigation measures:

- 4.7.6.3A Prior to the issuance of grading permits for each phase of the project, the project proponent shall submit evidence to the City that all requirements identified in Chapter 15.09 (Floodplain Management) of the City's Municipal Code have been fulfilled to the City floodplain administrator's satisfaction.
- 4.7.6.3B Prior to the issuance of grading permits for Phase 2 and Phase 3, the project applicant shall submit to the City supporting evidence of compliance with FEMA CLOMR-F specifications and requirements including the discussion and analysis of fill material placement, elevation changes, and hydro-modification impacts.

The EIR concluded that after these mitigation measures are implemented, the Original Project's impacts relating to flooding and hydromodification would be reduced to less than significant levels.

The Project would develop the same Site analyzed in the EIR and would be required to implement the same mitigation measures adopted in the EIR. Thus, like the Original Project, the Project would be required to raise the Site out of the 100-year floodplain, which could require the importation of approximately 660,000 cubic yards of fill materials. Short-term air quality, noise, and traffic impacts attributable to the imported fill material were addressed in the certified EIR. With implementation of mitigation measures 4.7.6.3A and 4.7.6.3B, the Project would not result in a significant impact relating to flooding hazards (refer to Appendices 5 through 7). (Thienes, 2023b; Thienes, 2023c; Thienes, 2023d)

Accordingly, the Project would not result in any new or increased significant impacts relating to hydrology or water quality that were not already analyzed in, and fully covered by, the previously certified EIR.

7.K Land Use

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|----------|--|------------------------------|---------------------------|--|---|
| Would to | he project: | | | | |
| a. | Physically divide an established community? | | | | ⊠ |
| b. | Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | 1 1 1 | | | × |

The EIR concluded the Original Project would not cause a significant impact related to land use and planning. As discussed in the EIR, though implementation of the Original Project would represent establishment of new land uses on the Site, the character and overall intensity of the proposed development was determined to be consistent with and comparable to existing land uses within the City and Project vicinity. The Original Project involved the approval of a General Plan amendment, specific plan amendment, and zone change to permit industrial warehouse use on the Site. Furthermore, the EIR concluded that the Original Project would not conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Thus, the EIR did not propose any mitigation measures and concluded that all impacts were less than significant.

When the City approved the Original Project, it approved the General Plan amendment, specific plan amendment, and zone change that allows the uses proposed by the Project – in other words, the proposed uses are already permitted on the Site, without the need for further legislative approvals. The Project applicant proposes uses that are permitted on the Site as a result of the Original Project (*i.e.*, tilt up industrial buildings), and as such, the Project is consistent with and comparable to existing land uses within the City and vicinity of the Site. The proposed uses are also vested, as a result of the Development Agreement that was approved as part of the Original Project. Furthermore, as with the Original Project, the Project would not conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, even without mitigation, the Project would not cause a significant impact on land use and planning, the same conclusion reached in the EIR.

Since certification of the EIR, the City has updated the Safety Element and added an Environmental Justice Element and a Healthy Communities Element to its General Plan. Table 7.K.1 shows the Project's consistency with new policies that have been adopted for the purposes of avoiding or mitigating an environmental effect. As shown, the Project would be consistent with the City's new General Plan goals and policies and impacts would be less than significant.

Table 7.K.1 Project Consistency with the City's Safety, Environmental Justice, and Healthy Communities Element

| General Plan Policy | General Plan Policy Consistency Analysis | | | | |
|--|---|--|--|--|--|
| Safety Element | Consistency Amarysis | | | | |
| Goal S-2: A community designed to effectively respond to emergencies and ensure the safety of residents and | | | | | |
| Policy S-2.1: Require road upgrades as part of new developments/major remodels to ensure adequate evacuation and emergency vehicle access. Limit improvements for existing building sites to property frontages. | Consistent. The Project would implement road improvements such as re-surfacing, pavement widening, traffic signal modifications, aerial utility undergrounding, corner improvements, and rail crossing modifications to Goetz Road, Mapes Road, "A" Street, Watson Road, and Ellis Avenue. Refer to Section 4.A, Road Improvements, for a detailed discussion of the proposed roadway improvements. As discussed in Section 7.Q, Transportation, the Project would reduce the already less than significant transportation impacts disclosed and analyzed in the EIR, including traffic hazards. Therefore, the Project would be consistent with this policy. | | | | |
| Policy S-2.2 : Require new development or major remodels include backbone infrastructure master plans substantially consistent with the provisions of "Infrastructure Concept Plans" in the Land Use Element. | Consistent. As discussed in Section 4, <i>Proposed Major Modification to Phase 2</i> , the Project includes improvements to road, storm drain, and sewer infrastructure which fall under the "Infrastructure Concept Plans" in the General Plan Land Use Element. Therefore, the Project would be consistent with this policy. | | | | |
| Policy S-2.5 : Require all new developments, redevelopments, and major remodels to provide adequate ingress/egress, including at least two points of access for sites, neighborhoods, and/or subdivisions. | Consistent. As shown on Figure 6, <i>Site Plan</i> , the Project would include eight (8) points of access for the Project site. Additionally, the Project would reduce the number of drive cuts while providing greater flexibility for truck circulation and queuing, generally reducing the impacts on nearby City streets. Furthermore, the Project would separate the circulation for trucks, auto and pedestrians for efficiency and safety. Therefore, the Project would be consistent with this policy. | | | | |
| Goal S-4: A community where the potential impacts asso | ociated with flood-related hazards are minimized. | | | | |
| Policy S-4.1 : Restrict future development in areas of high flood hazard potential until it can be shown that risk is or can be mitigated. | Consistent. The EIR concluded that the Phase 2 development would be raised out of the 100-year floodplain through implementation of mitigation measures MM 4.7.6.3A and MM 4.7.6.3B. Therefore, the Project would comply with these mitigation measures and would be consistent with this policy. | | | | |
| Policy S-4.3 : Require new development projects and major remodels to control stormwater runoff on site. | Consistent. The Project would include the construction of an onsite storm drain system as part of the industrial facility and would also include the construction of offsite storm drain improvements. As part of the onsite system, each building would have a private storm drain system to collect the runoff from the site and convey it to a proposed channel to be constructed along the Project's perimeter as a flood control measure to protect the industrial facility. Therefore, the Project would be consistent with this policy. | | | | |

| General Plan Policy | Consistency Analysis | | | | |
|--|--|--|--|--|--|
| Policy S-4.4: Require flood mitigation plans for all | Consistent. The EIR concluded that the Phase 2 | | | | |
| proposed projects in the 100-year floodplain (Flood | development would be raised out of the 100-year | | | | |
| Zone A and Flood Zone AE). | floodplain through implementation of mitigation | | | | |
| , | measures MM 4.7.6.3A and MM 4.7.6.3B. Therefore, | | | | |
| | the Project would comply with these mitigation | | | | |
| | measures and would be consistent with this policy. | | | | |
| Policy S-4.5 : Ensure areas downstream of dams within | Consistent. The EIR observed that flooding in the City | | | | |
| the City are aware of the hazard potential and educated | could result in rapid runoff through the failure of dams. | | | | |
| on the necessary steps to prepare and respond to these | e In order to reduce these impacts, the EIR impo | | | | |
| risks. | mitigation measures MM 4.7.6.3A and 4.7.6.3B for | | | | |
| | impacts related to flooding and hydromodification. The | | | | |
| | Project would be required to implement the same | | | | |
| | mitigation measures adopted in the EIR. Therefore, the | | | | |
| | Project would be consistent with this policy. | | | | |
| Goal S-5: A community prioritizing fire hazard reduction | | | | | |
| Policy S-5.3: Promote new development and | Consistent. According to Figure S-05, Wildfire | | | | |
| redevelopment in areas of the City outside the VHFHSZ | Hazards, of the City of Perris General Plan Safety | | | | |
| and allow for the transfer of development rights into | Element, the Site is located within a Local Responsibility Area and is not located within or near an | | | | |
| lower-risk areas, if feasible. | area identified as being a Very High Fire Hazard | | | | |
| | Severity Zone (Perris, 2022). The Site is not within a | | | | |
| | State Responsibility Area. Additionally, the Project is | | | | |
| | not located within a VHRHSZ as identified by CalFire's | | | | |
| | Fire Hazard Severity Zone Viewer, updated June 15, | | | | |
| | 2023. Therefore, the Project would be consistent with | | | | |
| | this policy. | | | | |
| Policy S-5.6: All developments throughout the City | Consistent. As shown on Figure 6, Site Plan, the Project | | | | |
| Zones are required to provide adequate circulation | would include eight (8) points of access for the Project | | | | |
| capacity, including connections to at least two roadways | site. Additionally, the Project would reduce the number | | | | |
| for evacuation. | of drive cuts while providing greater flexibility for truck | | | | |
| | circulation and queuing, generally reducing the impacts | | | | |
| | on nearby City streets. Furthermore, the Project would | | | | |
| | separate the circulation for trucks, auto and pedestrians | | | | |
| | for efficiency and safety. Therefore, the Project would | | | | |
| D.P. 0710 P. 44 12 4 | be consistent with this policy. | | | | |
| Policy S-5.10: Ensure that existing and new | Consistent. The EIR concluded the Original Project | | | | |
| developments have adequate water supplies and | would not cause significant impacts to utilities and | | | | |
| conveyance capacity to meet daily demands and firefighting requirements. | service systems. The water demand for the Project | | | | |
| inengining requirements. | would be incrementally less than the water demand for the Original Project. Therefore, the Project would be | | | | |
| | consistent with this policy. | | | | |
| Goal S-6 : Ensure an effective response to aircraft hazard | | | | | |
| Policy S-6.1: Ensure new development and | Consistent. As stated above, the EIR concluded that the | | | | |
| redevelopments comply with the development | Original Project's impacts related to airport land use | | | | |
| requirements of the AICUZ Land Use Compatibility | compatibility would be less than significant with | | | | |
| Guidelines and ALUP Airport Influence Area for March | mitigation. While Phase 1 of the Original Project is | | | | |
| Air Reserve Base. | entirely inside Airport Compatibility Zone D, and Phase | | | | |
| | 3 is located partially in Zones D and E, the Site being | | | | |
| | analyzed here (Phase 2) is located completely outside all | | | | |
| | Airport Influence Areas, including those established for | | | | |
| | Perris Valley Airport and March Air Reserve | | | | |
| | Base/Inland Port Airport. Therefore, the Project would | | | | |
| | be consistent with this policy. | | | | |

General Plan Policy

Policy S-6.2: Effectively coordinate with March Air Reserve Base, Perris Valley Airport, and the March Inland Port Airport Authority on development within its influence areas.

Consistency Analysis

Consistent. The EIR disclosed and analyzed all the potential impacts of the Original Project related to hazardous and hazardous materials and found that the only potentially significant impacts relate to the Original Project's location within the Airport Compatibility Zone of the Perris Valley Airport and within the vicinity of the MARB. Following a May 14, 2009 Riverside County ALUC hearing, ALUC determined that the Original Project was consistent with the applicable ALUP, and the EIR concluded the same, subject to conditions. As stated above, the Project Site is outside of all Airport Influence Areas. Therefore, the Project would be consistent with this policy.

Goal S-7: A built environment that is resilient to the effects of seismic ground shaking and other geologic hazards and better able to recover from these events.

Policy S-7.1: Require all development to provide adequate protection from damage associated with seismic incidents.

Policy S-7.2: Require geological and geotechnical investigations by State-licensed professionals in areas with potential for seismic and geologic hazards as part of the environmental and development review and approval process.

Consistent. The Project's proposed buildings would not result in the development of property outside of the same Site previously analyzed by the EIR. Additionally, State Building Codes and other applicable regulatory requirements that the Project must comply with have been strengthened to be more protective against earthquakes and other seismic activity since the time the EIR was certified. Therefore, the Project would be consistent with this policy.

Healthy Community Element

Goal HC-1: Citywide Health - Foster educational opportunities that show a connection between "place" and health.

Policy HC 1.3: Improve safety and the perception of safety by requiring adequate lighting, street visibility, and defensible space

Consistent. As described in the EIR, any additional light generated by the Project would be required to comply with lighting requirements contained in the City's Zoning Code and Riverside County Ordinance 655. Therefore, the Project would be consistent with this policy.

Goal HC-6: Healthy Environment – Support efforts of local businesses and regional agencies to improve the health of our region's environment.

Policy HC 6.3: Promote measures that will be effective in reducing emissions during construction activities.

- Perris will ensure that construction activities follow existing South Coast Air Quality Management District (SCAQMD) rules and regulations.
- All construction equipment for public and private projects will also comply with California Air Resources Board's vehicle standards. For projects that may exceed daily construction emissions established by the SCAQMD, Best Available Control Measures will be incorporated to reduce construction emissions to below daily emission standards established by the SCAQMD.
- Project proponents will be required to prepare and implement a Construction Management Plan which will include Best Available Control Measures among others. Appropriate control measures will be determined on a project by

Consistent. As discussed in Section 7.C, Air Quality, the Project applicant would be required to implement all applicable mitigation measures imposed on the Original Project by the EIR, and would also be subject to more stringent regulatory requirements, including SCAQMD rules and regulations. SCAQMD rules and regulations have become stricter since the time that EIR was certified (thereby reducing a greater amount of fugitive dust and other emissions), meaning that the EIR disclosed and analyzed greater impacts under the thenexisting regulations. Further, the Project's development intensity compared to the Original Project has also been reduced. The short-term construction emissions are reduced when compared to the Original Project. The short-term construction emissions are also anticipated to be less than the emissions disclosed and analyzed in the EIR due to the implementation of newer and cleaner offroad equipment that has been developed in the decade since the EIR was certified. Therefore, the Project would be consistent with this policy.

| General Plan Policy | Consistency Analysis |
|--|----------------------|
| project basis and should be specific to the pollutant for which the daily threshold is exceeded. | |
| Environmental Justice Element | |

C 1 2 1 A

Goal 3.1: A community that reduces the negative impacts of the land use changes, environmental hazards and climate change on disadvantage communities.

Policy: Continue to ensure new development is compatible with the surrounding uses by co-locating compatible uses and using physical barriers, geographic features, roadways or other infrastructure to separate less compatible uses. When this is not possible, impacts may be mitigated using: noise barriers, building insulation, sound buffers, traffic diversion

Consistent. The EIR concluded that after the mitigation measures are implemented, the Original Project's long-term operational impacts on noise levels at the closest sensitive receptors would be reduced to less than significant levels. The Project would be required to implement these same mitigation measures, as applicable. EIR mitigation measure MM 4.9.6.1B requires the implementation of an 8-foot high noise barrier along the northern end of the dock and trailer parking areas between buildings. Similarly, the Project would be required to implement the same mitigation. Therefore, the Project would be consistent with this policy.

Policy: Support identification, clean-up and remediation of local toxic sites through the development review process.

Consistent. As identified in the EIR for the Original Project, the Project Site is not listed on any hazardous materials sites, and construction activities would not disturb any toxic sites or require remediation. Impacts were determined to be less than significant. Therefore, the Project would be consistent with this policy.

Policy: Encourage smoke-free/vape-free workplaces, multi-family housing, parks, and other outdoor gathering places to reduce exposure to second-hand smoke.

Policy: As part of the development review process, require conditions that promote Good Neighbor Policies for Industrial Development for industrial buildings larger than 100,000 square feet. The conditions shall be aimed at protecting nearby homes, churches, parks, daycare centers, schools, and nursing homes from air pollution, noise, lighting, and traffic associated with large warehouses, making them a "good neighbor."

Consistent. The EIR disclosed and analyzed potentially significant impacts related to health risk from DPM emissions from trucks, warehousing operations and locomotives using rail, including impacts on nearby sensitive receptors. In an effort to reduce the carcinogenic and non-carcinogenic chronic projectrelated emissions impacts, the EIR proposed several mitigation measures, which were adopted. The EIR concluded that after the implementation of the foregoing mitigation measures, the Original Project's impacts on carcinogenic and chronic project-related emissions impacts would be reduced to less than significant levels. The Project would not result in new or increased impacts on health risk when compared to the impacts of the Original Project analyzed in the EIR. All significant carcinogenic and chronic project-related impacts identified by the EIR would result from the use of large, heavy-duty diesel-powered equipment, forklifts, train engines, and warehouse equipment for delivering and moving supplies during operation of the Original Project. The Project would not increase the use of warehouse industrial equipment at the Site. Instead, the Project would result in reduced square footage, reducing impacts resulting from industrial warehouse operations related to delivering and moving supplies, and therefore reducing potential health risks. Additionally, the Project would implement all mitigation measures identified in the EIR related to air quality, noise, lighting, and traffic. Therefore, the Project would be consistent with this policy.

| General Plan Policy | Consistency Analysis | | | |
|--|---|--|--|--|
| Goal 5.1 : Neighborhoods designed to promote safe and residents. | accessible connectivity to neighborhood amenities for all | | | |
| Policy : Require developers to provide pedestrian and bike friendly infrastructure in alignment with the vision set in the City's Active Transportation plan or active transportation in-lieu fee to fund active mobility projects. | Consistent. The Project would result in additional benefits when compared to the Original Project, as it adds parking and reduces the number of drive cuts while providing greater flexibility for truck circulation and queuing, generally reducing the impacts on nearby city streets. Furthermore, the Project would separate the circulation for trucks, auto and pedestrians for efficiency and safety. Therefore, the Project would be consistent with this policy. | | | |

Accordingly, the Project would not result in any new or increased significant impacts relating to land use that were not already analyzed in, and fully covered by, the previously certified EIR. In fact, because the uses are already permitted on the Site (and in fact vested), impacts to land use from the Project are actually reduced when compared to the Original Project.

7.L Mineral Resources

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis | |
|---------|--|------------------------------|---------------------------|--|---|--|
| Would t | Would the project: | | | | | |
| a. | Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | | | | X | |
| b. | Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | | | | X | |

The EIR concluded that, based on the Initial Study prepared by the City and attached to the EIR as Appendix A, all of the Original Project's impacts on mineral resources were less than significant without mitigation, and did not warrant detailed discussion in the EIR. There is no evidence of any mineral resources underlying the Site or in the surrounding areas.

The Project would not result in the development of property outside of the same Site previously analyzed by the EIR, nor is there any evidence that any aspect of the Project would have an impact on mineral resources, including offsite improvements. Therefore, the Project would not result in new, different, or increased impacts related to mineral resources resulting from the development of the same Site.

Accordingly, the Project would not result in any new or increased significant impacts on mineral resources that were not already analyzed in, and fully covered by, the previously certified EIR.

7.M Noise

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|----------|--|------------------------------|---------------------------|--|---|
| Would to | he project result in: | | | | |
| a. | Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | | | | × |
| b. | Generation of excessive groundborne vibration or groundborne noise levels? | | | | oxtimes |
| c. | For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | | | | × |

The EIR identified both short- and long-term noise impacts resulting from construction and operation of the Original Project. In the short term, the EIR concluded that construction would cause a temporary increase in noise, but all impacts related thereto would nonetheless be less than significant. Construction noise from the Project would similarly be less than significant and there would be less construction activities (and less total square footage constructed) than the EIR assumed would occur on the Site as the result of the construction of the Original Project.

Long-Term Operational Noise Impacts

The EIR identified increased long term noise levels that would result from the Original Project and determined that project operation would result in noise levels at the closest sensitive receptors exceeding the maximum exterior and interior noise level allowed. As identified in the EIR, the Original Project's proposed warehouse uses would generate noise from truck delivery, loading/unloading activities at loading areas, and other noise-producing activities within the parking lot. The EIR proposed the following measures to mitigate these long-term impacts (Mitigation Measure 4.9.6.1A and 4.9.6.1C are specific to Phases 1 and 3, respectively, and therefore are not included herein):

4.9.6.1B Prior to the issuance of certificates of occupancy permits for Phase 2, the project proponent shall provide evidence to the City that an 8-foot-high noise barrier shall be constructed along the northern end of the dock and trailer parking area

beginning from the eastern face of Building 1 across to the western face of Building 3 and across the northern end of the dock and trailer parking area beginning from the eastern face of Building 3 across to the western face of Building 4.

- 4.9.6.1D Prior to the issuance of occupancy permits for any phasing, the project proponent shall provide evidence to the City that the noise barriers have a surface density of at least 3.5 pounds per square foot and have no openings or gaps. The noise barriers shall be constructed using an earthen berm, a free-standing wall, or a combination of these two methods. The free-standing wall shall be constructed from decorative block material. The access gates shall be solid barriers, as opposed to wrought iron fences, and must have a surface density of at least 3.5 pounds per square foot and have no openings or gaps. The access gates can be constructed using 13-gauge sheet steel, 3/8" glass, 5/8" Plexiglas, 1 1/4" plywood, or a combination of these materials.
- 4.9.6.2A Prior to the issuance of occupancy permits for Phase 2, the project proponent shall coordinate with the City in the formation of a Quiet Zone along the proposed 11th Street and Mapes Road at-grade crossings. The project proponent and the City shall engage in the process of creating a Quiet Zone which includes but is not limited to the following actions:
 - Provision of a written Notice of Intent to Establish a Quiet Zone to the Federal Railroad Administration, California Public Utilities Commission, and the railroad carrier operating over the impacted right-of-way; and
 - Provision of evidence to the Federal Railroad Administration and the California Public Utilities Commission that the at-grade crossings meet all safety criteria for establishing a quiet zone.

The EIR concluded that after these mitigation measures are implemented, the Original Project's long-term operational impacts on noise levels at the closest sensitive receptors would be reduced to less than significant levels. The Project would be required to implement these same mitigation measures, as applicable. As mentioned above, the Project is not proposing a rail spur, and thus Mitigation Measure 4.9.6.2A would no longer be applicable here. Mitigation Measure 4.9.6.1B would be modified as shown below in light of the modification to the building layout and number of the proposed buildings.

4.9.6.1B Prior to the issuance of certificates of occupancy permits for Phase 2, the project proponent shall provide evidence to the City that an 8-foot-high noise barrier shall be constructed along the northern end of the dock and trailer parking area beginning from the eastern face of Building 1 across to the western face of Building 3 and across the northern end of the dock and trailer parking area beginning from the eastern face of Building 3 across to the western face of Building 4.

The Project would result in the operation of less square footage of the same industrial uses permitted by the Original Project, and therefore noise levels from operation of the Project would generally be less than the noise levels that the EIR assumed would be generated by the development of the Original Project on the Site. This is true for both onsite operations and mobile source noise because the Project would result in less traffic generation than the Original Project, thereby reducing mobile source noise. (*See*, Appendix 8)

Accordingly, the Project would not result in any new or increased significant impacts relating to noise that were not already analyzed in, and fully covered by, the previously certified EIR. In fact, because less square footage would be developed by the Project when compared to the Original Project, noise generation levels and resulting noise impacts would be reduced when compared to the Original Project.

7.N Population and Housing

| Would to | he project: | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|----------|--|------------------------------|---------------------------|--|---|
| a. | Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | | | | × |
| b. | Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | | | | × |

The EIR concluded that, based on the Initial Study prepared by the City and attached to the EIR as Appendix A, all of the Original Project's impacts on population and housing were less than significant without mitigation, and did not warrant detailed discussion in the EIR. As concluded therein, the Original Project involves the development of industrial uses, and as such would not result in substantial unplanned growth or the demolition of existing housing.

The Project consists of the same industrial uses permitted by the Original Project and would not result in the development or otherwise impact property outside of the same Site previously analyzed by the EIR. The Project would add employment in similar numbers as the Original Project, but as concluded in the EIR, it would not be enough to induce substantial growth. The Project does not include the development of new homes, and there is enough existing housing in the City and surrounding areas for the Project's future employees. The Project also would not displace or demolish existing residences.

Accordingly, the Project would not result in any new or increased significant impacts on population and housing that were not already analyzed in, and fully covered by, the previously certified EIR.

7.O Public Services/Utilities

| | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|---|------------------------------|---------------------------|--|---|
| Would the project: | | | | |
| a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: | | | | |
| Fire protection? | | | | \boxtimes |
| Police protection? | | | | X |
| Schools? | | | | × |
| Parks? | | | | X |
| Other public facilities? | | | | \boxtimes |

The EIR concluded the Original Project would not cause significant impacts to public services because the development of industrial uses would not induce substantial population growth, and therefore would not cause fire or police staffing or equipment to operate at a deficient level of service. Additionally, the EIR noted that under the Original Project, the applicant would be required to pay development impact fees to fund future fire and police facilities and services with the development of each site. Similarly, because the Original Project does not involve the development of housing, it would have a less than significant impact on schools, parks and other

public services, the need for which is generated by new housing developments, not new industrial developments. Accordingly, impacts associated with public services for the Original Project were determined to be less than significant and no mitigation was required.

The Project's proposed use remains industrial and does not result in the development of residential uses, nor does the Project add enough jobs to induce residential development in the area. Further, the Project is not more susceptible to risks requiring additional police or fire services than the Original Project, and instead, the Project would result in less square footage developed than the Original Project, generally lessening the demands on public services. Finally, as was the case with the Original Project, the applicant here would be required to pay development impact fees to fund future services and facilities. The Project would also result in less than significant impacts on all public services. Thus, no significant impact related to increased demand on any public services or facilities would result from the Project.

Accordingly, the Project would not result in any new or increased significant impacts relating to public services that were not already analyzed in, and fully covered by, the previously certified EIR.

7.P Recreation

| Would t | he project: | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|---------|---|------------------------------|---------------------------|--|---|
| a. | Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | _ | | | X |
| b. | Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | | | | × |

The EIR concluded that, based on the Initial Study prepared by the City and attached to the EIR as Appendix A, all of the Original Project's impacts on recreation were less than significant without mitigation, and did not warrant detailed discussion in the EIR. The Original Project does not propose residential uses, and as a result, would not increase usage of City parks or require construction of new parks.

Like the Original Project, the Project proposes industrial warehouse uses, and therefore does not result in the development of residential uses, nor would the Project add enough jobs to induce residential development in the area. Further, the Project would result in less square footage being

developed than permitted by the Original Project, making any demands for recreation that did result less than those resulting from the Original Project.

Accordingly, the Project would not result in any new or increased significant impacts on recreation that were not already analyzed in, and fully covered by, the previously certified EIR.

7.Q Transportation

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|----------|---|------------------------------|---------------------------|--|---|
| Would th | he project: | | | | |
| a. | Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? | | | | \boxtimes |
| b. | Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) | | | | \boxtimes |
| c. | Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | | | | X |
| d. | Result in inadequate emergency access? | | | | × |

Urban Crossroads performed Trip Generation Analysis ("TIA") for the Project, which is attached to this Addendum as Appendix 8, and incorporated herein by this reference (Urban Crossroads, 2023b). The TIA calculates trip generation numbers for both the Original Project and the Project using the statistics published in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021). Calculations are provided in both passenger-car equivalents ("PCE") and raw trip numbers. The PCE factors are consistent with the recommended PCE factors in the City's Guidelines.

In analyzing the Original Project, the EIR used the 2007 National Association of Industrial and Office Properties ("NAIOP") trip generation study to forecast trip rates. However, in order to generate an accurate trip comparison while using the most current trip rate assumptions, the TIA applies the 2021 ITE Manual methodologies to both the originally approved development plan and new site plan alternatives. These updated methodologies are more modern, based on an extra decade of study and improved assumptions, and generally accepted by professionals as more accurate. The trip generation rates used are set forth in Table 1 of the TIA, in Appendix 8.

Using the most current assumptions, the Original Project would have resulted in the following trip generation from the development of the Phase 2 Site (Table 7.Q.1):

Table 7.Q.1 Original Project Trip Generation Summary

| | | AM | Peak H | lour | PM | Peak F | lour | |
|--|-----------------------------|-----|--------|-------|-----|--------|-------|-------|
| Land Use | Quantity Units ¹ | In | Out | Total | In | Out | Total | Daily |
| South Perris Distribution Center | 3,448.734 TSF | | | | | | | |
| Passenger Cars: | | 178 | 29 | 207 | 79 | 231 | 310 | 4,070 |
| 2-axle Trucks: | | 7 | 5 | 12 | 3 | 2 | 5 | 128 |
| 3-axle Trucks: | | 7 | 7 | 14 | 3 | 4 | 7 | 158 |
| 4+-axle Trucks: | | 21 | 22 | 43 | 10 | 11 | 21 | 476 |
| Total Truck Trips (Actual Vehicles): | | 35 | 34 | 69 | 16 | 17 | 33 | 762 |
| Total Trips (Actual Vehicles) ² | | 213 | 63 | 276 | 95 | 248 | 343 | 4,832 |
| 2-axle Trucks (PCE = 1.5): | | 11 | 8 | 18 | 5 | 3 | 8 | 192 |
| 3-axle Trucks (PCE = 2.0): | | 14 | 14 | 28 | 6 | 8 | 14 | 316 |
| 4+-axle Trucks (PCE = 3.0): | | 63 | 66 | 129 | 30 | 33 | 63 | 1,428 |
| Total Truck Trips (PCE): | | 88 | 88 | 175 | 41 | 44 | 85 | 1,936 |
| Total Trips (PCE) ² | | 266 | 117 | 382 | 120 | 275 | 395 | 6,006 |

¹ TSF = thousand square feet

Source: (Urban Crossroads, 2023b)

Table 7.Q.2 shows the Project would result in the following trip generation:

Table 7.Q.2 Project Trip Generation Summary

| | | AM | Peak H | lour | PM | Peak F | lour | |
|--|-----------------------------|-----|--------|-------|-----|--------|-------|-------|
| Land Use | Quantity Units ¹ | In | Out | Total | In | Out | Total | Daily |
| Proposed Project | 3,345.217 TSF | | | | | | | |
| Passenger Cars: | | 173 | 28 | 201 | 77 | 224 | 301 | 3,948 |
| 2-axle Trucks: | | 7 | 4 | 11 | 3 | 2 | 5 | 124 |
| 3-axle Trucks: | | 7 | 7 | 14 | 3 | 4 | 7 | 152 |
| 4+-axle Trucks: | | 20 | 22 | 42 | 10 | 11 | 21 | 462 |
| Total Truck Trips (Actual Vehicles): | | 34 | 33 | 67 | 16 | 17 | 33 | 738 |
| Total Trips (Actual Vehicles) ² | | 207 | 61 | 268 | 93 | 241 | 334 | 4,686 |
| 2-axle Trucks (PCE = 1.5): | | 11 | 6 | 17 | 5 | 3 | 8 | 186 |
| 3-axle Trucks (PCE = 2.0): | | 14 | 14 | 28 | 6 | 8 | 14 | 304 |
| 4+-axle Trucks (PCE = 3.0): | | 60 | 66 | 126 | 30 | 33 | 63 | 1,386 |
| Total Truck Trips (PCE): | | 85 | 86 | 171 | 41 | 44 | 85 | 1,876 |
| Total Trips (PCE) ² | | 258 | 114 | 372 | 118 | 268 | 386 | 5,824 |
| ¹ TSF = thousand square feet | | | | | | | | |

² Total Trips = Passenger Cars + Truck Trips.

Source: (Urban Crossroads, 2023b)

² Total Trips = Passenger Cars + Truck Trips.

Table 7.Q.3 provides a comparison of the total peak-hour and daily trip generation for the previously approved Original Project (Phase 2 Site only) and the Project, both in actual vehicles and PCE trips.

Table 7.Q.3 Trip Generation Comparison

| | | AM | AM Peak Hour | | | PM Peak Hour | | | |
|----------------------------|-----------------------------|-----|--------------|-------|-----|--------------|-------|-------|--|
| | Quantity Units ¹ | In | Out | Total | In | Out | Total | Daily | |
| Original Project | 3,448.734 TSF | | | | | | | | |
| Actual Vehicles | | 213 | 63 | 276 | 95 | 248 | 343 | 4,832 | |
| PCE | | 266 | 117 | 382 | 120 | 275 | 395 | 6,006 | |
| Project | 3,343.217 TSF | | | | | | | | |
| Actual Vehicles | | 207 | 61 | 268 | 93 | 241 | 334 | 4,686 | |
| PCE | | 258 | 114 | 372 | 118 | 268 | 386 | 5,824 | |
| Net Change Actual Vehicles | -103.517 TSF | -6 | -2 | -8 | -2 | -7 | -9 | -146 | |
| Net Change PCE | | -8 | -3 | -11 | -2 | -7 | -9 | -182 | |

^{1.} TSF = Thousand Square Feet Source: (Urban Crossroads, 2023b)

As set forth in Table 7.Q.3, above, the Project would reduce the traffic generated by the development of the Site when compared to the traffic that would be generated by the Original Project analyzed in the EIR. This is true whether actual vehicle numbers or a passenger car equivalent (PCE) analysis is used. Accordingly, the impacts of the Project relating to traffic and transportation are fully covered by the previously certified EIR, because the Project would not result in any new or increased significant impacts.

In addition to the Project reducing the traffic generated by development of the Site when compared to the traffic that would have been generated by the Original Project, the Project would not increase the number of residents, or result in any other factors that would increase impacts on traffic and circulation that were not previously analyzed by the EIR. Additionally, the Project would be required to implement any applicable mitigation measures implemented by the EIR.

The Project results in less square footage being developed on the Site than assumed in the previously certified EIR; thus, the Project would result in less traffic generated than the Original Project, as demonstrated by the results of the TIA detailed above. (*See*, Appendix 8.). As a result, the Project's impacts on transportation would generally be reduced when compared to the impacts of the development of the Site permitted by Original Project, as disclosed and analyzed in the EIR. Accordingly, the Project would not result in any new or increased significant impacts on transportation that was not already analyzed in, and fully covered by, the previously certified EIR.

Vehicle Miles Traveled (VMT) Analysis

Vehicle miles traveled (VMT) is based on the number of trips and the distance those trips travel to and from the project. A multiplication of the number of trips and the average distance of trips results in a total VMT for the project. The Original Project EIR did not specifically analyze vehicle VMT for traffic analysis purposes, as VMT was not a CEQA requirement at the time of its

preparation, but it is nonetheless not new information of significant importance because all the information required to determine VMT generated by the Original Project is contained in the previously certified EIR, as explained herein. Further, because the EIR was certified prior to the recently enacted VMT regulations, a VMT analysis is not legally required in this Addendum thereto.

In December 2018, the California Natural Resources Agency finalized updates to the State CEQA Guidelines, which included Senate Bill 743 (SB 743). SB 743 was signed into law by the Governor in 2013. SB 743 required the Office of Planning and Research and the California Natural Resources Agency to develop alternative methods of measuring transportation impacts under CEOA. Regulatory changes to the State CEQA Guidelines that implement SB 743 were approved on December 28, 2018. Under those new regulatory changes, new State CEQA Guidelines section 15064.3 provides that transportation impacts of projects are, in general, best measured by evaluating the project's VMT. Automobile delay (often called Level of Service) would no longer be considered an environmental impact under CEQA. Automobile delay can, however, still be used by agencies to determine local operational impacts. Because this Addendum is to an EIR certified well before the adoption of SB 742 and Guidelines section 15064.3, VMT analysis is not required as part of this Addendum. However, a VMT analysis has nonetheless been prepared for both the Original Project and the Project for informational purposes, and to ensure compliance with SB 743. (See, Appendix 9.) As demonstrated herein, the Project's VMTs would be reduced compared to the Original Project, and therefore no new or increased significant impacts not already analyzed in the EIR would result.

Urban Crossroads performed Vehicle Miles Traveled (VMT) Comparative Analysis ("VMT Analysis") for the Project, which is attached to this Addendum as Appendix 9, and incorporated herein by reference (Urban Crossroads, 2023c). City Guidelines identify the Riverside County Transportation Model (RIVCOM), as the appropriate tool for conducting VMT analysis for land use projects in the City of Perris. The RIVCOM model utilizes socio-economic data (SED) (e.g., employment) instead of land use information to estimate vehicle trips. Project building square footage has been converted to employment and input into the Project's traffic analysis zone (TAZ) to estimate VMT. Employment for the Project has been estimated based on standard employment generation factors from the Riverside County General Plan.

Urban Crossroads utilized the Origin/Destination (OD) method for calculating VMT, which sums all weekday VMT generated by trips with at least one trip end in the study area. The OD method accounts for all trips (i.e., both passenger cars and trucks) and trip purposes (i.e., total VMT) and therefore provides a more complete estimate of VMT. Table 7.Q 4, VMT Comparison, presents generated total OD VMT for both the Original Project and the Project.

Table 7.Q.4 VMT Comparison

| | Original Project | Project |
|----------------------------|------------------|-----------|
| Building Area | 3,448,734 SF | 3,345,217 |
| Employees | 3,348 | 3,248 |
| Total OD VMT | 107,576 | 104,652 |
| Net Change in Total OD VMT | -2 | ,924 |

Source: (Urban Crossroads, 2023c)

Accordingly, the total project VMT impacts resulting from the Project would be lower than the Original Project because of the reduction in building size, reduction in vehicle trips, and the possibility for the inclusion of freight rail transportation. This is expected considering that the Project would reduce the amount of development that the Original Project would have allowed on the Phase 2 Site by 103,517 square feet. Thus, the VMT impacts of the Project would be less than the Original Project evaluated in the EIR, and as a result, the Project would not result in any new or increased significant impacts on transportation that were not already analyzed in, and fully covered by, the previously certified EIR. (*See*, Appendix 9.)

Traffic Hazards Analysis

The Original Project EIR identified potential impacts on traffic hazards resulting from development of the Original Project. The EIR concluded all of these impacts resulting from the Original Project were less than significant, and no mitigation measures were required.

The Project would result in less overall square footage (by 103,517 square feet) and lowered VMT, reducing the already less than significant impacts related to traffic hazards disclosed and analyzed in the EIR, which assumed more square footage and a larger building. Thus, just as is the case for significant transportation impacts, the Project would reduce the already less than significant transportation impacts disclosed and analyzed in the EIR, including traffic hazards.

Accordingly, the Project would not result in any new or increased significant impacts on traffic hazards, or any other aspect of traffic and/or transportation, that were not already analyzed in, and fully covered by, the previously certified EIR.

7.R Tribal Cultural Resources

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|---------|---|------------------------------|---------------------------|--|---|
| Would t | he project: | | | | |
| a. | Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: | | | | × |
| | i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | | | | × |
| | ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe | | | | X |

As part of the processing of the approval of the Original Project and as described in the EIR, the City engaged in the required Native American Consultation with respect to the Site, and discussed the Site with two tribes, the Soboba Band of Luiseño Indians and Pechanga Band of Luiseño Indians, and a cultural resources analysis was conducted.

The EIR explained that a May 2009 field survey was conducted, where it encountered greatly reduced (poor) ground visibility in the project area due to the presence of unharvested grain and hare oats (over a foot tall in some areas), which almost completely obscured the surface of the Site (less than 10% visibility). The ground surface was more accessible in the linear disked areas, with visibility approximately 65 percent. No significant difference in visibility over the balance of the project area was observed, including the two onsite random 5-acre areas of grain field surveyed. Traces of modern refuse and fragmentary structural debris (e.g., concrete and blacktop fragments), along with some sheep and cow bones, were observed, indicating use of the land for sheep and cattle pasturage. The project area has been severely disturbed by decades of agricultural activities and lightly impacted by roadside debris and dumping. However, no cultural resources were

identified during the follow-up field survey. Although no historic or archaeological resources were identified during the survey, previously unidentified historic resources potentially may be encountered during project construction. The EIR concluded that adherence to the following mitigation measures would mitigate all potential impacts of the development of the Site on cultural resources, including the development of an extension of the existing rail line to serve the Site:

- 4.5.5.1A In the event of the accidental discovery or recognition of any human remains on the project, the following steps shall be taken:
 - There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:
 - The coroner of the county in which the remains are discovered must be contacted to determine that no investigation of the cause of death is required, and
 - o If the coroner determines the remains to be Native American:
 - The coroner shall contact the NAHC within 24 hours.
 - The NAHC shall identify the person or persons it believes to be the most likely descended from the deceased Native American.
 - The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98, or
 - Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further and future subsurface disturbance pursuant to Public Resources Code Section 5097.98(e).
 - o The NAHC is unable to identify a most likely descendent.
 - The most likely descendant is identified by the NAHC, fails to make a recommendation within 48 hours of being granted access to the site; or
 - The landowner or his authorized representative rejects the recommendation of the descendant, and a mediation by the NAHC fails to provide measures acceptable to the landowner.
- 4.5.5.2A Prior to grading of the project site, the project developer shall hire a qualified archaeologist to provide cultural resource monitoring services at the project site. Selection of the archaeologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the site until the archaeologist has been approved by the City. During grading activities, the archaeologist shall monitor earth moving activities at the project sites consistent with Public Resources Code Section 21083.2(b), (c), and (d). The archaeologist shall be equipped to record and salvage cultural resources that may be unearthed during grading activities. The archaeologist shall be empowered to temporarily

halt or divert grading equipment to allow recording and removal of the unearthed resources. If the archaeologist identifies resources of a prehistoric or Native American origin, a Native American observer shall be added to the monitoring program and accompany the archaeologist for the duration of the grading phase. Any Native American resources shall be evaluated in accordance with the CEQA Guidelines and either reburied at the project sites or curated at an accredited facility approved by the City of Perris. Once grading activities have ceased or the archaeologist determines that monitoring is no longer necessary, monitoring activities can be discontinued.

The Project would be subject to the foregoing mitigation measures (as applicable) and would result in the development of the same Site previously analyzed by the EIR, and therefore the Project does not affect any tribal cultural resources outside of the Original Project's development envelope, as analyzed in the EIR.

Accordingly, the Project would not result in any new or increased significant impacts on tribal resources that were not already analyzed in, and fully covered by, the previously certified EIR.

7.S <u>Utilities and Service Systems</u>

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|----------|---|------------------------------|---------------------------|--|---|
| Would th | he project: | | | | |
| a. | Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | | | | X |
| b. | Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years | | | | × |
| c. | Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | | | | × |
| d. | Generate solid waste in excess of State or local standards, or in excess of the capacity of local | | | | × |

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|----|---|------------------------------|---------------------------|--|---|
| | infrastructure, or otherwise impair the attainment of solid waste reduction goals? | | | | |
| e. | Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | | | | \boxtimes |

The EIR ultimately concluded that the Original Project would have no significant impacts on utilities and service systems. However, the EIR identified potentially significant impacts on stormwater and drainage facilities, as the Original Project proposed to route stormwater flows from the three Original Project sites to various stormwater drainage facilities into the Perris Valley Storm Channel. As a result, the EIR proposed the following mitigation measure:

4.12.6.1A Prior to the issuance of a grading permit, the project proponent shall submit a detailed grading and drainage plan, with supporting engineering calculations, to the City Engineer for review and approval. The plans shall incorporate relevant requirements identified by the City, and/or identified in the Uniform Building Code, and/or site-specific geotechnical investigations. The plans shall provide evidence that the storm drainage system would be adequate to convey water for the design storm event (as specified by the City) from the project site.

The EIR concluded after the implementation of this mitigation measure, the Original Project would have a less than significant impact on stormwater drainage capacity.

The Project does not change this analysis because its development would not increase the volume of stormwater runoff by significantly altering the development and uses analyzed under the original EIR. The Project would develop the same 210-acre Site as analyzed in the EIR, and in fact, would result in the development of 103,517 less square feet of building area, and one less building. Further, the Project would implement the foregoing mitigation measures, and any other conditions of approval imposed by the City relating to the offsite storm water improvements that it would require. All impacts relating to utilities and service systems would also be less than significant.

Accordingly, the Project would not result in any new or increased significant impacts on utilities and service systems that were not already analyzed in, and fully covered by, the previously certified EIR.

7.T Wildfire

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|---------------------|---|------------------------------|---------------------------|--|---|
| If located project: | d in or near state responsibility areas or lands cla | ssified as ver | y high fire ho | azard severity zoi | nes, would the |
| a. | Substantially impair an adopted emergency response plan or emergency evacuation plan? | | | | × |
| b. | Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | | | | × |
| c. | Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | | | | × |
| d. | Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | | | | × |

Wildfire as a separate topic was not evaluated in the EIR since it was not a CEQA threshold of significance at the time that the EIR was prepared and certified. According to Figure S-05, Wildfire Hazards, of the City of Perris General Plan Safety Element, the Site is located within a Local Responsibility Area and is not located within or near an area identified as being a Very High Fire Hazard Severity Zone (Perris, 2022). The Site is not within a State Responsibility Area. Therefore, the Project would have no impacts related to wildfires or the associated issues identified in thresholds a through d, above.

The Project would not result in the development outside the area previously analyzed by the Initial Study and EIR (one of the three project sites analyzed therein), as a result, there would be no new, different or increased impacts related to wildfires. Further, redeveloping a vacant Site that may contain fuel for wildfires with an industrial use would actually reduce fire risk. The Project would also comply with all applicable regulations, including the California Fire Code and emergency response plan, and since the time the Original Project was approved and the EIR certified, the California Fire Code has been updated to be more protective against wildfires. Accordingly, the Project's compliance with the current Fire Code and other applicable regulations would further

reduce impacts related to wildfires when compared to impacts the EIR assumed would occur from the Original Project.

Accordingly, the Project would not result in any new or increased significant impacts on geology and soils that were not already analyzed in, and fully covered by, the previously certified EIR.

7.U Mandatory Findings of Significance

| | | New Significant Impact | More Severe Impacts | New Ability to Substantially Reduce Significant Impact | No Substantial Change from Previous Analysis |
|----|---|------------------------------|---------------------------|--|---|
| a. | Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory? | | | | |
| b. | Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)? | | | | × |
| c. | Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? | | | | oxtimes |

The EIR found the following impacts of the Original Project to be significant and unavoidable:

Traffic (Local Conditions) – Cumulative freeway mainline traffic impacts to several segments of the I-215 were found to be significant and unavoidable.

Air Quality – The project will introduce significant construction emissions, fugitive dust emissions, localized operational emissions, and cumulative potentially significant impacts on global climate change.

The Project would not result in the need to make any new or different mandatory findings of significance. The significance conclusions under the Project are the same as the EIR's conclusion

because the Project would not cause any new or increased significant impacts under any impact category. Not only would no new or increased significant impacts result from the Project when compared to the Original Project, as noted throughout this document, the Project would actually result in incrementally decreased impacts in many categories as a result of the fact that the Project allows significantly less square footage to be developed on the Site than assumed and analyzed in the EIR as part of its analysis of the impacts of the Original Project. As such, the Project would reduce the severity of the significant and unavoidable traffic and air quality impacts disclosed in the EIR, but it would not reduce these impacts to a less than significant level.

Based on the findings and information contained in the previous EIR, the analysis above, and the CEQA statute and State CEQA Guidelines, including sections 15162 through 15164, the Project would not result in any additional effects on any environmental resources located on or near the Site and the potential environmental effects of the proposed relocation have been adequately addressed in the previously certified EIR for the South Perris Industrial Project. No new or increased impacts not already analyzed in the EIR would result from the Project, and there is no new information of substantial importance that was not available at the time the EIR was certified. Therefore, the approval of this Addendum to the EIR is appropriate under State CEQA Guidelines section 15164 and the Public Resources Code.

8 REFERENCES

- BFSA Environmental Services (BFSA). 2022a. Cultural Resources Records Search Results for the PLC South Sewer Realignment Project, Perris California. (Appendix 2).
- ——. 2022b. Paleontological Assessment for the PLC South Sewer Realignment Project, Perris, Riverside County, California. (Appendix 3)
- LSA Associates, Inc. (LSA). 2010, May 5. Final Environmental Impact Report State Clearinghouse No. 2008071060, South Perris Industrial, City of Perris, Riverside County, California. Certified July 13, 2010.
- Thienes Engineering, Inc. (Thienes). 2023a. Project Specific Preliminary Water Quality Management Plan for P22-05265 Perris Logistics Center South. (Appendix 4)
- ———. 2023b. Preliminary Hydrology Calculations for Perris Logistics Center South Building 1. (Appendix 5)
- . 2023c. *Preliminary Hydrology Calculations for Perris Logistics Center South Building 2*. (Appendix 6)
- ——. 2023d. *Preliminary Hydrology Calculations for Perris Logistics Center South Building 3*. (Appendix 7).
- Urban Crossroads, Inc. (Urban Crossroads). 2023a. Perris Logistics Center South Air Quality & Greenhouse Gas Assessment. (Appendix 1)

Analysis. (Appendix 9)