

## Chapter 6 Other CEQA Considerations

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Section 15128 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines) requires that an Environmental Impact Report (EIR) contain a brief statement disclosing the reasons why various possible significant effects of a project were found not to be significant and, therefore, would not be discussed in detail in the EIR. The City of Perris reviewed The Cubes at Placentia Industrial Project (project) against the environmental issue areas in Appendix G of the CEQA Guidelines. All environmental issue areas, including those found to have potentially significant impacts, are addressed in Chapter 4, Environmental Analysis, of this EIR except the following: Agriculture and Forestry Resources, Mineral Resources, Population and Housing, Public Services, Recreation and Wildfire. These environmental issue areas were determined to result in no impact or a less than significant impact from implementation of the project and, therefore, are addressed separately in Section 6.1, Impacts Found Not to Be Significant, of this chapter.

In addition, Section 15126 of the CEQA Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the EIR must identify the following three components, which are also addressed in this chapter:

- Significant environmental impacts that could not be avoided if the project is implemented (addressed in Section 6.2, Significant Environmental Impacts)
- Significant, irreversible environmental impacts that would be involved in the project should it be implemented (addressed in Section 6.3, Significant and Unavoidable Environmental Impacts).
- Growth-inducing impacts of the project (addressed in Section 6.4, Growth-Inducing Impacts)

### 6.1 Impacts Found Not to Be Significant

A Notice of Preparation (included as Appendix A of this EIR) and initial study were prepared in accordance with CEQA Guidelines, Section 15063(c), during the environmental scoping process. The Notice of Preparation and associated initial study determined that the Proposed Project would result in no impact or a less than significant impact for the following environmental impact categories from Appendix G of the CEQA Guidelines:

- Agriculture and Forestry
- Mineral Resources
- Population and Housing
- Public Services
- Recreation

- Wildfire

In accordance with CEQA Guidelines Section 15128, a brief justification regarding the effects found not to be significant (e.g., the environmental resource areas not analyzed in Chapter 4) can be found in Appendix A.

## 6.2 Significant Environmental Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The environmental impacts of the Project are discussed in Sections 4.1 through 4.14 of this EIR, as applicable. With incorporation of applicable Perris Valley Commerce Center Specific Plan (PVCCSP) EIR mitigation measures and Project-level mitigation measures, potential impacts related to the following topical issues would be less than significant: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology, Land Use and Planning, Noise, Transportation, Tribal Cultural Resources, and Utilities and Services Systems.

The Proposed Project would not result in any significant and unavoidable impacts.

## 6.3 Significant Irreversible Changes Due to the Proposed Project

Section 15126.2(d) of the CEQA Guidelines requires a discussion of any significant, irreversible environmental changes that would be caused by the project. Generally, a project would result in significant, irreversible environmental impacts if the following would occur:

- The project would involve a large commitment of nonrenewable resources.
- The primary and secondary impacts would generally commit future generations to similar uses (e.g., a highway improvement that provides access to a previously inaccessible area).
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project.
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Implementation of the Proposed Project would involve construction of a new industrial warehouse building and additional trailer truck storage spaces within the City of Perris. Therefore, additional commitment of nonrenewable and/or slowly renewable energy resources, natural resources, and human resources would be necessary. Irreversible construction materials, such as lumber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metal, water, etc., would be consumed, and increased commitment of social services and public maintenance services such as police, fire, sewer, water, solid waste, natural gas services, etc., would also be required. These

energy and social service commitments would be long-term obligations. Once these commitments are made, it is improbable that the project area would revert to its current condition. Additional development intensities can be more readily accommodated with minimal physical impact, relieving development pressure from other areas where more intensive use of nonrenewable resources would be necessary. Nonetheless, the Proposed Project would not result in significant irreversible changes to the environment throughout the lifespan of the structures.

## 6.4 Growth-Inducing Impacts

Pursuant to Sections 15126(d) and 15126.2(d) of the CEQA Guidelines, this section is provided to examine ways in which the proposed project could directly or indirectly foster economic or population growth or the construction of additional housing in the surrounding environment. Also required is an assessment of other projects that would foster other activities which could affect the environment, individually or cumulatively. To address this issue, potential growth-inducing effects will be examined through analysis of the following questions:

- Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?
- Would this project result in the need to expand one or more public services to maintain desired levels of service?
- Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Please note that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information on ways in which this project could contribute to significant changes in the environment, beyond the direct consequences of developing the land use concept examined in the preceding sections of this EIR.

**Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?**

As identified in Section 5.0, Other CEQA Topics, of the PVCCSP EIR, the City of Perris General Plan EIR concludes that new development consistent with the Perris General Plan would require extension and upgrading of major infrastructure (e.g., sewer and water facilities, storm drains, roadways, and dry utilities), and indirect extension of infrastructure represents a significant impact. The Proposed Project would implement the PVCCSP and would not involve the construction of

any major roadways or infrastructure that are not already planned in the City of Perris General Plan or PVCCSP to accommodate anticipated growth.

Further, existing utility infrastructure and facilities are available adjacent to or in proximity to the Project Site. New utility infrastructure would be required to serve the proposed development and connect to existing utilities. The utility infrastructure would be sized and located expressly to serve the proposed development and would not therefore induce growth in the Project vicinity.

The Project would implement the approved PVCCSP and is consistent with the planned uses for the Project Site. The Proposed Project requires a Specific Plan Amendment to vacate and remove a non-developed planned street and Murrieta Road between Placentia Avenue and the Perris Valley Storm Drain Channel. Though the Proposed Project requires a Specific Plan Amendment, the Proposed Project was found by the Riverside County Airport Land Use Commission to be consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan at its meeting on July 11, 2024.

No General Plan amendment, or zone change is proposed or required. Therefore, the Project would not change existing regulations pertaining to land development. The Project is not considered to be growth inducing with respect to removal of obstacles to growth.

**Would this project result in the need to expand one or more public services to maintain desired levels of service?**

As discussed in Notice of Preparation and associated initial study (refer to Appendix A), the Proposed Project would not require additional public services to maintain desired levels of service at buildout. Therefore, project implementation would not result in service capacity beyond what is approved, nor would there be physical or significant environmental impacts. The Proposed Project would not, therefore, have significant growth-inducing consequences with respect to public services.

**Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?**

A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with the increase in project population and thus reducing or removing the barriers to growth. This occurs in suburban or rural areas where population growth results in increased demand for service and commodity markets responding to the new population. This type of growth is, however, a regional phenomenon resulting from introduction of a major employment center or regionally significant housing project. Additional commercial uses may be drawn to the area by the increased number of residents in the area because of a project. However, it is expected that any such development would occur consistent with planned growth identified in the City of Perris General Plan.

During project construction, a number of design, engineering, and construction-related jobs would be created, which would be a direct, growth-inducing effect of this project. However, the Proposed Project would create jobs within the City that would be expected to be filled by the existing regional population. The job creation, both in the short-term during construction and the long-term at the proposed warehouse, would not be of a magnitude to induce substantial population growth. Additionally, the Project site is currently vacant and therefore implementation of the Proposed Project would not necessitate the construction of replacement housing. Additionally, the Proposed Project would create employment opportunities in a housing rich area and is expected to reduce vehicle miles travelled and thereby reduce air quality impacts.

Table 4.8-E, Development Intensity and Employment Projections, of the PVCCSP EIR, identifies average employment generation factors for the allowed development types identified in the PVCCSP. As this relates to industrial uses, 1 employee per 1,030 square feet is estimated for Light Industrial floor space.

The Project Applicant proposes to construct a concrete tilt up warehouse building. It would encompass 573,265 square feet and include a 5,000-square-foot mezzanine, for a total building area of 578,265 square feet. Assuming the employment generation for the proposed would be consistent with Table 4.8-E of the PVCCSP EIR, the Project would result in approximately 1,157 new employees. The PVCCSP EIR estimates that implementation of the land uses allowed under the PVCCSP would result in the generation of approximately 56,087 jobs/employees in the area. Therefore, the employment generation estimated for the Proposed Project represents approximately 1 percent of the total employment generation anticipated in the PVCC area. Additionally, it is anticipated that these new warehouse/distribution positions would be filled by workers who would already reside in the region. Consistent with the conclusions of the PVCCSP EIR, operation of the Proposed Project would not generate a permanent increase in population within the City and would not increase the demand for additional goods and services.

**Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?**

As identified above, the Proposed Project would implement the PVCCSP and would not involve a General Plan amendment or zone change. Additionally, no changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, fire codes) are proposed or required to implement this Project. The Project-level and PVCCSP EIR mitigation measures have been identified in Sections 4.1 through 4.14 of this EIR to ensure that implementation of the Project complies with all applicable City plans, policies, and ordinances to ensure that no conflicts with adopted land development regulations occur and that environmental impacts are minimized. The Project does not propose any precedent-setting actions that, if approved, would specifically allow, or encourage other projects and resultant growth to occur.

Pressures to develop other land in the surrounding area may derive from regional economic conditions and market demands for housing, commercial, office, and industrial land uses that may be directly or indirectly influenced by the Proposed Project. As the development intensity associated with the Proposed Project is allocated to future development, proposals may arise to amend the General Plan and Zoning Code. However, these amendments would require a full environmental analysis of the impacts of such actions. Therefore, although the project may be considered a precedent-setting action, the impacts of subsequent similar actions would require environmental analysis and associated mitigation to ensure that subsequent impacts would not significantly affect the environment.

#### **6.4.1 Elimination of Obstacles to Growth**

Elimination of obstacles to growth refers to the extent to which a proposed project removes infrastructure limitations or provides infrastructure capacity or removes regulatory constraints that could result in growth unforeseen at the time of project approval.

The elimination of either physical or regulatory obstacles to growth is considered a growth-inducing effect although not necessarily a significant one. A physical obstacle to growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services would be expected to support new development. Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth.

#### **6.4.2 Economic Expansion or Growth**

Economic effects refer to the extent to which a proposed project could cause increased activity in the local or regional economy. Economic effects can include such effects as the “multiplier effect.” A “multiplier” is an economic term used to describe interrelationships among various sectors of the economy. The multiplier effect provides a quantitative description of the direct employment effect of a project and the indirect and induced employment growth. The multiplier effect acknowledges that the on-site employment and population growth of each project is not the complete picture of growth caused by the project.

The Proposed Project would affect the local economy through the construction of a warehouse building intended to attract a distribution firm seeking an Inland Empire base from which to service their clientele. The proposed warehouse would provide employment opportunities for residents of the City and surrounding area and reduce VMT and commuting time to employment further away from the City.