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Draft Environmental Impact Report
First Industrial Logistics at Harley Knox and Indian

DPR 22-00016 and TPM 25-0004 (TPM 38684)

Prepared for

City of Perris

December 2025

Draft Environmental Impact Report

First Industrial Logistics at Harley Knox and Indian Project

(DPR 22-00016 and TPM 25-0004 (TPM 38684))

Perris, California

SCH No. 22025051368

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Acronyms

AAQS	Ambient Air Quality Standards
AB	Assembly Bill
AB-32	The California Global Warming Solutions Act of 2006
AB-52	Assembly Bill 52
AB-939	California Integrated Waste Management Act
ACBCI	Agua Caliente Band of Cahuilla Indians
ACT	Advanced Clean Trucks
ADA	Americans with Disabilities Act
ADP	Area Drainage Plan
ADT	Average Daily Traffic
AFY	Acre Feet Per Year
AIA	Airport Influence Area
AICUZ	Air Installation Compatible Use Zones
ALUC	Airport Land Use Commission
AMI	Advanced Metering Infrastructure
AMSL	Above Mean Sea Level
ANSI	American National Standards Institute
AOZ	Airport Overlay Zone
APN	Assessor's Parcel Number
APZ	Accident Potential Zone
APZ-1	Accident Potential Zone I
APZ-2	Accident Potential Zone II
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
ARRA	American Recovery and Reinvestment Act
ASF	Age Specific Factor
ASHRAE	American Society of Heating, Refrigeration, and Air Conditioning Engineers
BACT	Best Available Control Technology
Basin	South Coast Air Basin
BAU	Business-as-usual
BMP	Best Management Practices
BP	Before Present
BPO	Business Professional Office
Btu	British thermal units
BUOW	Burrowing Owl
C	Commercial
CAA	Federal Clean Air Act
CAAP	Clean Air Action Plan
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy

Cal/ARP	California Emergency Management Agency's Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
Cal EPA	California Environmental Protection Agency
Cal Fire	California Department of Forestry and Fire Protection
CalGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
CalTrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CARE CA	Californians Allied for a Responsible Economy
CASGEM	California Statewide Groundwater Elevation Monitoring
CBC	California Building Code
CBSB	California Building Standards Commission
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDF	California Department of Forestry and Fire Protection
CDFW	California Department of Fish and Wildlife
CDMV	Department of Motor Vehicles
CEAP	Community Energy Action Plan
CEC	California Energy Commission
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CF_4	Perfluoromethane
CFC	California Fire Code
CFCs	Chlorofluorocarbons
CFR	Code of Federal Regulations
CFS	Cubic Feet per Second
CGS	California Geological Survey
CH_4	Methane
CHP	Combined Heat and Power
CHRIS	California Historical Resource Information System
CIWMB	California Integrated Waste Management Board
CMA	Congestion Management Agency
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	CO_2-equivalents
COG	Council of Governments
CPUC	California Public Utilities Commission

CREC	Controlled Recognized Environmental Conditions
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
CWA	Federal Clean Water Act
CY	Cubic Yards
CZ	Clear Zone
DAMP	Drainage Area Management Plan
dB	decibel
dBA	A-weighted decibel
Bcf	Billion Cubic Feet
DBESP	Determination of Biologically Equivalent or Superior Preservation
DC	Design Conditions Report
DCV	Design Capture Volume
DGE	Diesel Gallons Equivalent
DEIR	Draft Environmental Impact Report
DIF	Development Impact Fees
DNL	Day-Night Average Noise Level
DOC	Department of Conservation
DOE	U.S. Department of Energy
DOGGR	Division of Oil, Gas, and Geothermal Resources
DOPP	Database of Proposed Projects
DOT	Department of Transportation
DBR	Daily Breathing Rate
DPM	Diesel Particulate Matter
DPR	Development Plan Review
DTSC	Department of Toxic Substances Control
DWR	California Department of Water Resources
ED	Exposure Duration
EG	Electric Generation
EIC	Eastern Information Center
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act
EMWD	Eastern Municipal Water District
EOR	Enhanced Oil Recovery
EPA	Environmental Protection Agency
EPCA	Federal Energy Policy and Conservation Act
ESA	Endangered Species Act
EV	Electric Vehicles
EVSE	Electric Vehicle Supply Equipment
FAA	Federal Aviation Administration
FAH	Fraction of Time at Home
FAR	Federal Aviation Regulations

FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program
FPEIR	Final Program Environmental Impact Report
FRA	Federal Railroad Administration
FRAP	Fire and Resources Protection
FTA	Federal Transit Administration
FT	Feet
GGE	Gross Gasoline Equivalents
GHG	Greenhouse Gas
GI	General Industrial
GIS	Geographic Information System
GMZ	Groundwater Management Zone
GP 2030	Perris Comprehensive General Plan 2030
GP 2030 EIR	Perris Comprehensive General Plan EIR
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plan
GWh	Million Kilowatt-Hours
GWMP	Groundwater Management Plan
GWP	Global Warming Potential
HABS	Historic American Buildings Survey
HAER	Historic American Engineering Record
HANS	Habitat Evaluation and Acquisition Negotiation Strategy
HAPs	Hazardous Air Pollutants
HC	Hydrocarbons
H&C	Health and Safety Code
HCOC	Hydrologic Condition of Concern
HCP	Habitat Conservation Plan
HDV	Heavy Duty Vehicle
HFCs	Hydrofluorocarbons
HMTA	Hazardous Materials Transportation Act
HMTUSA	Hazardous Materials Transportation Uniform Safety Act
HP	Horse Power
HRA	Health Risk Assessment
HRECs	Historical Recognized Environmental Conditions
HSC	Health and Safety Code
HSJ	Hemet/San Jacinto Ground Water Management Plan
HSWA	Hazardous and Solid Waste Amendments
HVAC	Heating, Ventilation, and Air Conditioning
HVIP	Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project
HVLP	High Velocity-Low Pressure

HWCL	Hazardous Waste Control Law
IBC	International Building Code
IPA	Inland Port Airport
IPCC	Intergovernmental Panel on Climate Change
ISTEA	Intermodal Surface Transportation Efficiency Act
ITE	Institute of Traffic Engineers
JPR	Joint Project Review
kWh	Kilowatt-Hour
kBtus	kilo-British thermal units
Lb	Pound
LBs/SF	Pounds per Square Foot
LCFS	Low Carbon Fuel Standards
LDMF	Local Development Mitigation Fee
LED	Light-Emitting Diode
LEED	Leadership in Energy and Environmental Design
L_{eq}	Equivalent Continuous Sound Level
LI	Light Industrial
LID	Low Impact Development
LOS	Level of Service
LST	Localized Significance Threshold
LUCP	Land Use Compatibility Plan
LRTS	Long Range Transportation Study
MARB	March Air Reserve Base
MARB/IPA	March Air Reserve Base/Inland Port Airport
MARB/IPA LUCP	March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan
MATES	Multiple Air Toxics Exposure Study
MBTA	Migratory Bird Treaty Act
MDP	Master Drainage Plan
MEP	Maximum Extent Practicable
MGD	Million Gallons Per Day
MHMP	County of Riverside Multi-Jurisdictional Hazard Mitigation Plan
MICR	Maximum Individual Cancer Risk
MLD	Most Likely Descendent
MM	Mitigation Measure
MPOs	Metropolitan Planning Organization
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
MTA	Metropolitan Transportation Authority
$MTCO_2E$	Metric Tons of CO_2E
MWD	Metropolitan Water District of Southern California

MY	Model Years
NAAQS	National Ambient Air Quality Standards
n/a	Not applicable
NAHC	Native American Heritage Commission
NAS	National Academy of Sciences
NCCP	Natural Communities Conservation Plan
NEPA	National Environmental Policy Act
NGV	Natural Gas Vehicles
NH4NO3	Ammonium Nitrate
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic and Safety Administration
NPDES	National Pollutant Discharge Elimination System
NPRBBD	North Perris Road and Bridge Benefit District
NO	Nitric Oxide
NO_2	Nitrogen Dioxide
NOx	Oxides of Nitrogen
NOP	Notice of Preparation
NRHP	National Register of Historic Places
NWS	National Weather Service
O_3	Ozone
OCP	Organochlorine Pesticides
OEHHA	Office of Environmental Health and Hazard Assessment
OPC	Ocean Protection Council (California)
OPR	Governor's Office of Planning and Research
OS	Open Space
OSHA	U.S. Department of Labor's Occupational Safety and Health Administration
PA 1	Planning Area
PAH	Polycyclic Aromatic Hydrocarbons
Pb	Lead
PCE	Passenger Car Equivalence
PEL	Permissible Exposure Limit
PEV	Plug-in Electric Vehicle
PG&E	Pacific Gas & Electric
Phase I ESA	Phase I Environmental Site Assessment
PQP	Public/Quasi-Public
PM	Atmospheric Particulate Matter
PM-2.5	Particulate Matter less than 2.5 microns in diameter
PPV	Peak Particle Velocity
PM-10	Particulate Matter less than 10 microns in diameter
PRC	Public Resources Code
PRIMMP	Paleontological Resource Impact Mitigation Monitoring Program
PV	Photovoltaic

PVC	Perris Valley Channel
PVCCSP	Perris Valley Commerce Center Specific Plan
PVCCSP EIR	Perris Valley Commerce Center Specific Plan Environmental Impact Report
PVCCSP IS	Perris Valley Commerce Center Specific Plan Initial Study
PVL	Perris Valley Rail Line
PVSD	Perris Valley Storm Drain
PWQMP	Preliminary Water Quality Management Plan
QSD	Qualified Stormwater Pollution Prevention Plan Developer
RBOB	Reformulated Gasoline Blendstock for Oxygenate Blending
RCA	Western Riverside County Regional Conservation Agency)
RCALUC	Riverside County Airport Land Use Commission
RCALUCP	Riverside County ALUCP
RCB	Reinforced Concrete Box
RCDEH	Riverside County Department of Environmental Health
RCFC&WCD	Riverside County Flood Control and Water Conservation District
RCHCA	Riverside County Habitat Conservation Agency
RCLS	Riverside County Library System
RCNM	Roadway Construction Noise Model
RCP	Reinforced Concrete Pipe
RCRA	Resource Conservation and Recovery Act
RCSD	Riverside County Sheriff's Department
RCTC	Riverside County Transportation Commission
RCDWR	Riverside County Department of Waste Resources
RCGP EIR	Riverside County General Plan Environmental Impact Report
REC	Recognized Environmental Conditions
REL	Reference Exposure Level
RFD	Riverside Fire Department
RFS	Renewable Fuel Standard
RMS	Root Mean Square
ROG	Reactive Organic Gases
ROW	Right of Way
RPS	Renewable Portfolio Standard
RSHA	Regional System of Highways and Arterials
RST	Regional Significance Threshold
RTA	Riverside Transit Agency
RTPs	Regional Transportation Plans
RTPA	Regional Transportation Planning Agency
RTP/SCS	Regional Transportation Plan / Sustainable Communities Strategy
RWRF	Regional Water Reclamation Facilities
RWQCB	Regional Water Quality Control Board
RWQCP	Regional Water Quality Control Plant
SB 100	Senate Bill 100

SB 350	Senate Bill 350
SB 605	Senate Bill 605
SB 1016	Solid Waste Disposal Measurement Act of 2008
SB	Senate Bill
SBCTA	San Bernardino County Transportation Authority
SB X7-7	Water Conservation Act of 2009
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SoCal Gas	Southern California Gas Company
SDG&E	San Diego Gas & Electric
SEER	Seasonal Energy Efficiency Ratio
SCMA	Sustainable Groundwater Management Act
SF	Square Feet
SHMA	Seismic Hazards Mapping Act
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SJVAPCD	San Joaquin Valley Air Pollution Control District
SKR	Stephens' Kangaroo Rat
SLCP	Short-lived Climate Pollution
SLF	Sacred Lands File
SKR HCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SO_2	Sulfur Dioxide
SOON	Surplus Off-road Opt-in for NOx
SOx	Sulfur Oxides
SR-60	State Route 60
SRA	Source Receptor Area
SRA	State Responsibility Area
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TAZ	Transportation Analysis Zone
TCA	Trichloroethane
TCM	Transportation Control Measure
T-BACT	Best Available Control Technology for Toxics
TEA-21	Transportation Equity Act for the 21st Century
TIA	Traffic Impact Analysis
TMDL	Total Maximum Daily Load
TOD	Transit-Oriented Development
TPM	Tentative Parcel Map
TRUs	Transport Refrigeration Unit
TUA	Traditional Use Area

TUMF	Transportation Uniform Mitigation Fee (Western Riverside County)
UBC	Uniform Building Code
UCR	University of California, Riverside
UCR-ARU	University of California, Riverside Archaeological Research Unit
UCMP	University of California Museum of Paleontology
USACE	U.S. Army Corps of Engineers
USCB	United States Census Bureau
USDA	United States Department of Agriculture
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
UWMP Act	Urban Water Management Planning Act
VdB	Vibration Decibel
VHFHSZ	Very High Fire Hazard Severity Zone
VHT	Vehicle Hours Traveled
VIP	Voucher Incentive Program
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VVUSD	Val Verde Unified School District
WA	Williamson Act
WCI	Western Regional Climate Action Initiative
WDR	Waste Discharge Requirements
WELO	Water Efficient Landscape Orientation
WQMP	Water Quality Management Plan
WRCOG	Western Riverside County Council of Governments
WRCC	Western Regional Climate Center
WRELP	Western Riverside Energy Leader Partner
WRRA	Waste Reuse and Recycling Act
WSA	Water Supply Assessment
WSC	Western Sciences Center
WSJ	West San Jacinto Groundwater Basin Management Plan
ZEV	Zero-emission vehicle

1.0 Executive Summary

This Draft Environmental Report (Draft EIR) has been prepared to inform decision-makers and the public of the potentially significant environmental effects associated with the project approvals for the construction and operation of a proposed high-cube, non-refrigerated warehouse building located at the northwest corner of Harley Knox Boulevard and Indian Avenue, and all associated on- and off-site supporting improvements, which are herein collectively referred to as the "Project" or "proposed Project." Discretionary actions to be considered by the City of Perris associated with the proposed Project includes Tentative Parcel Map (TPM 38684) and Development Plan Review (DPR 22-00016). The Project Description serves as a basis for analyzing the Project's impacts on the existing physical environment. This analysis has been prepared pursuant to the California Environmental Quality Act, known as CEQA, (California Public Resources Code Sections 21000 et seq.) and the Guidelines for Implementation of the Environmental Quality Act (State CEQA Guidelines) (California Code of Regulations, Sections 15,000, et seq.). The City of Perris is the Lead Agency for the proposed Project under CEQA and is responsible for the preparation of this DEIR.

1.1 Project Location

The Project site encompasses approximately 25.10 gross acres of a vacant unimproved land. The Project site is located at northwest corner of Harley Knox Boulevard and Indian Avenue, within the City of Perris (City), Riverside County, California. As shown on **Figure 1.0-1 – Regional Map** and **Figure 1.0-2 – Aerial Map**, the proposed Project site consists of Assessor's Parcel Numbers (APNs) 302-020-013, 302-020-028, 302-020-038, 302-020-032, 302-020-040, 302-020-043, and 302-020-048. The Project site is located within Section 7, Township 4 South, Range 3 West, San Bernardino Base and Meridian, on the Perris, California USGS 7.5 Quadrangle Map (Perris Quadrangle) as shown on **Figure 1.0-3 – USGS Topographic Map**. The proposed Project also includes a 1.10-acre off-site improvement area for improvements in Harley Knox Boulevard and Indian Avenue, and a drainage connection to the Riverside County Flood Control and Water Conservation District, Line B, located to the north of the Project site, as shown on **Figure 1.0-2**.

As shown in Exhibit LU 1: Planning Areas, of the City of Perris General Plan Land Use Element, the City of Perris is divided into 10 planning areas to provide more detailed land use and policy direction regarding local issues (e.g., land use circulation and open space). The planning areas are defined by similarities and opportunities in land uses, development patterns, and future developments. The Project site lies within Planning Area 1: North Industrial. This area is generally made up of "industrial" land use designations and uses. While there are some residential uses in this area, the majority of land uses are non-residential. Heavy truck traffic can be expected in this area, affecting future roadway design and maintenance.

The Project site is also located within the northern portion of the Perris Valley Commerce Center (PVCC) area, which encompasses more than five square-miles and over 3,500 acres in the northern end of the City. The PVCC area is relatively flat, sloping in a southeasterly direction with elevations ranging from 1,430 to 1,500 feet above mean sea level. (PVCCSP, p. 1.0-1, 1.0-5). The City lies on the Perris Block, a 20- by 50-square-mile mass of crystalline rocks generated during the Cretaceous time period (Perris Comprehensive General Plan 2030. (Perris GP 2030 Safety Element, p. 26.) The Project site is located on land designated by the California Department of Conservation in its Farmland Mapping and Monitoring Program as "Prime Farmland," "Farmland of Local Importance." and "Urban and Built-Up Land" as shown in **Figure 1.0-16 – Farmland Map**. It is also located within the San Jacinto River Watershed,

which drains an approximately 540-square-mile area of western Riverside County. The 250-foot-wide Perris Valley Channel is the major tributary to the San Jacinto River within the City and flows from north to south through southern Moreno Valley and Perris. (Perris GP 2030 EIR, p. IV-48.)

1.2 Site Description

The Project site and off-site improvement area are relatively flat, with elevations averaging 1,450 feet above mean sea level. Historically, the Project site and off-site improvement area have been used for agricultural purposes. The Project site is currently unimproved and vacant. The southeast corner was previously developed with a 41,680-square-foot industrial building and associated parking lot and ornamental vegetation landscaping; however, that structure has been removed from the Project site. Views of the Project site and off-site improvement area existing condition are provided on **Figure 1.0-4 – Project Site Photographs**. The Project includes offsite improvements to the Perris Valley Storm Drain Channel which is a regional flood control structure which has been designed to receive storm water flows the Project site.

The Project site and off-site improvement area are located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Mead Valley Area Plan. The Project site is not located within an MSHCP Criteria Cell, Cell Group, or Linkage Area. In addition to the previous development, the Project site contains disturbed vegetation that receives frequent weed abatement (i.e., chain flail mowing, disking).

1.2.1 Existing General Plan Land Use and Zoning Designation

The Project site is located within Planning Area 1, North Industrial, of the City of Perris, which consists of approximately 1,925 acres and is bounded by the March Air Reserve Base/Inland Port Airport (March ARB/IPA) to the north, Interstate 215 (I-215) to the west, City limits near Lake Perris to the east, and Ramona Expressway to the south. Planning Area 1 is primarily made up of land designated for industrial use with very little area designated for residential use. The industrial planning of Planning Area 1 is based upon the restrictions placed on properties in this area due to flight operations of March ARB/IPA. The area to the west of Planning Area 1 is unincorporated Riverside County but is within the City's Sphere of Influence and is zoned for manufacturing under the Riverside County Zoning Ordinance. The Project site has a General Plan land use designation of PVCC SP - Perris Valley Commerce Center Specific Plan as shown on **Figure 1.0-5 – General Plan Land Use Designation**. The Perris Valey Commerce Center Specific Plan (PVCCSP) establishes the zoning for the properties within the PVCC area. The PVCCSP zoning designation for the Project site is General Industrial as shown on **Figure 1.0-6 – Specific Plan Zoning Designation**. The off-site improvement area is located mostly within Indiana Avenue and Harley Knox Boulevard rights of way, and within the Perris Valley Storm Drain Channel Lateral B, a Riverside County Flood Control and Water Conservation District storm drain facility.

1.2.2 Perris Valley Commerce Center Specific Plan

On January 10, 2012, the City Council adopted the PVCCSP for a PVCC area that encompasses approximately 5.23 square-miles in North Perris located east of I-215 and west of the Perris Valley Storm Drain, south of March ARB/IPA, and north of Placentia Avenue. This area provides convenient access to a multi-directional freeway system via I-215 traveling north and south and State Route 60 (SR-60) traveling east and west as well as access to March ARB/IPA for air transport. The PVCCSP Land Use

Plan envisions this area to be a concentrated commerce center with a balanced mix of industrial uses including Business Professional Office, Light Industrial, and General Industrial.

The Project site is designated as General Industrial in the PVCCSP planning area (**Figure 1.0-6**). The site is surrounded by areas designated as General Industrial to the south and west, Light Industrial to east, and the City of Moreno Valley to the North.

The General Industrial land use designation provides for the development of basic industrial uses which may support a wide range of manufacturing and non-manufacturing uses, from large-scale warehouse and warehouse/distribution facilities to outdoor industrial activities.

Section 3.0 of the PVCCSP also outlines land use planning and design standards to assist in accommodating future development proposals and provides suitable transitions to neighboring land uses. Additionally, the PVCCSP outlines green development practices to encourage and require construction methods and materials that have a lower environmental impact. The proposed Project would be required to comply with all design guidelines, landscape guidelines, and relevant policies outlined in the PVCCSP as well as the City of Perris General Plan.

1.2.3 Surrounding Land Uses

The area to the north of the Project site is located within the City of Moreno Valley. The area surrounding the Project site is dominated by vacant land and existing industrial uses as shown on **Figure 1.0-2** above, and as described in **Table 1.0-A – Surrounding Land Uses**, below.

Table 1.0-A– Surrounding Land Uses

Location	Existing Land Usage	General Plan Land Use Designation	Zoning Designation
Project Site	**Unimproved/Vacant Land, Warehouse Building that was demolished September 2023**	**PVCCSP - Perris Valley Commerce Center Specific Plan**	**PVCCSP - General Industrial**
North	Perris Valley Storm Drain Channel Lateral B; City of Moreno Valley Industrial uses and vacant land	Business Park/Light Industrial, Open Space (City of Moreno Valley)	SP2081- Industrial / Business Park, Open Space (City of Moreno Valley)
East	Warehouse	PVCC SP - Perris Valley Commerce Center Specific Plan	PVCCSP - Light Industrial
South	Vehicle auction/storage and asphalt manufacturing	PVCC SP - Perris Valley Commerce Center Specific Plan	PVCCSP - General Industrial
West	Vacant land	PVCC SP - Perris Valley Commerce Center Specific Plan	PVCCSP - General Industrial

1.2.4 Airport Land Use

The Project site and off-site improvement area are located approximately 5.9 miles to the northwest of Perris Valley Airport and are located outside of the Perris Valley Airport Influence Area. However, the Project site and the off-site improvement area are located within the March Air Reserve Base/Inland Port

Airport Comprehensive Land Use Plan Compatibility Zones A, B1-APZ I, B2, and C1 as shown on **Figure 1.0-7 – March Air Reserve Base /Inland Port Airport Compatibility Zones**.

In 2014, and subsequent to approval of the City of Perris General Plan, the Riverside County Airport Land Use Commission (ALUC) adopted the 2014 March ARB/IPA Airport Land Use Compatibility Plan (ALUCP). Thus, the City was required to update its General Plan to reflect the new ALUCP. The City created an Airport Overlay Zone (AOZ) to accommodate development within the City consistent with the land use designations of the 2014 March ARB/IPA ALUCP. On July 14, 2016, the Riverside County ALUC determined that the City's AOZ is consistent with the 2014 March ARB/IPA ALUCP.

The Initial Study, included as Appendix A of this Draft EIR, includes an analysis that shows how the Project is consistent with ALUCP and why the Project is not required to obtain an ALUC consistency determination.

1.2.5 Vehicular Circulation and Site Access

Regional access to the Project site is provided via Interstate 215 (I-215) located approximately two miles west of the Project site. Existing roadways adjacent to the Project site include Harley Knox Boulevard and Indian Avenue. There was an industrial development at the southeastern corner of the Project site, that was demolished in September 2023, that included access via three driveways. Due to the existing medians on Harley Knox Boulevard and Indian Avenue, only one driveway had full access (right-in/right-out and left-in/left-out) to the now demolished building. The City of Perris General Plan Circulation Element circulation designations and the current roadway conditions are described below: (Perris GP 2030 Circulation Element, pp. 24, 30, 41.)

- Harley Knox Boulevard is an east-west six-lane with a raised median roadway designated for 128 foot of right-of-way classified as an Arterial. From Redlands Avenue to I-215, Harley Knox Boulevard is a designated truck route. Harley Knox Boulevard, from Lake Perris Drive to Webster Avenue, is designated as a Class I Shared-Use Path. A Class I Shared-Use Path or Multipurpose Path provides paths completely separated from motor vehicle traffic for use by people walking and biking. Currently, Harley Knox Boulevard has a raised median throughout portions of the Project site's frontage. Portions of the northern half of Harley Knox Boulevard are unimproved and do not contain sidewalks, streetlights, gutters, or the Class I Shared-Use Path. Although, not designated, Harley Knox Boulevard's northern half contains a Class II Bikeway (Bike Lanes). Class II Bike Lanes provide one-way bike travel on a street or highway.
- Indian Avenue is a north-south four-lane roadway with a raised or painted median, designated for 94 foot of right-of-way classified as a Secondary Arterial. From the City's northern limits to Placentia Avenue, Indian Avenue is a designated truck route. Currently, Indian Avenue has a raised median and varies from three lanes at Harley Knox Boulevard to two lanes north of the Project site, where the two northbound lanes merge into a single lane to pass over the existing bridge. Portions of the Project site's frontage are currently unimproved and do not contain sidewalk, or curb and gutter.

1.2.6 Existing Utility Infrastructure

Water

Domestic water services in the Project vicinity are provided by the Eastern Municipal Water District (EMWD). There are existing water lines near the Project site: a12-inch-diameter water line in Harley Knox

Boulevard and Indian Avenue. There is also an existing 12-inch-diameter water line in Webster Avenue. (PVCCSP, p. 3.0-16.)

Recycled Water

Recycled water service in the Project vicinity is also provided by the EMWD. The EMWD maintains a 12-inch recycled water line in Indian Avenue that is capped and ends approximately 166 linear feet north from the Harley Knox Boulevard and Indian Avenue intersection. There are recycled water lines within Nance Street, south of the Project site, and Redlands Avenue east of the Project site. (PVCCSP, p. 3.0-19.) There are no other existing recycled water lines adjacent to the Project site.

Sewer

Sewer (wastewater) collection and treatment services in the Project vicinity are also provided by the EMWD. The EMWD maintains an existing 15-inch-diameter sewer main (flows east) in Harley Knox Boulevard along the Project site's frontage and an existing 12-inch-diameter sewer main (flows south) in Indian Avenue along the Project site's frontage.

Storm Drain

The Project site is located within the Perris Valley Master Drainage Plan within the San Jacinto River watershed, which is part of the larger Santa Ana River watershed. The Perris Valley Storm Drain Lateral B (hereinafter "Lateral B") is an existing Riverside County Flood Control and Water Conservation District storm drain facility that is located adjacent to the north of the Project site. (Refer to **Figure 1.0-2 – Aerial Map**.) Lateral B is an earthen channel that conveys stormwater with other tributaries and flows southerly to the San Jacinto River. Additionally, there is an existing City of Perris 18-inch-diameter storm drain in Indian Avenue that extends to a portion of Harley Knox Boulevard. This storm drain conveys runoff easterly in Harley Knox Boulevard then northerly in Indian Avenue to Lateral B.

Other Utilities

Existing development utility services are provided by the purveyors identified in **Table 1.0-B – Utility Purveyors**.

Table 1.0-B– Utility Purveyors

Services Provided	Purveyor
Water/Recycled Water	EMWD
Sewer	EMWD
Telephone	Verizon/Frontier
Electricity	Southern California Edison
Natural gas	Southern California Gas Company
Solid Waste Disposal	CR&R Incorporated
Cable Television/Internet	Frontier Communications
Source: PVCCSP and W&R	

There are existing utilities in the surrounding and offsite roadways as follows:

- Indian Avenue – There are two existing power poles and a streetlight along Indian Avenue, within the Project site's frontage. The northern portion of Indian Avenue, along the Project site's frontage, contains above ground telephone and electricity lines. The southern portion of Indian Avenue contains underground telephone and electricity lines.
- Harley Knox Boulevard – There are five (5) existing streetlights along Harley Knox Boulevard, within the Project Sites' frontage. There is an existing 6-inch diameter gas line in Harley Knox Boulevard.

1.2.7 Public Transit

Regional bus service in Western Riverside County, including the City, is provided by the Riverside Transit Agency, also known as RTA. Currently, the RTA operates two bus routes within the PVCC area; Routes 19 and 41. The closest bus route to the Project site is Route 19. The closest bus stop to the Project site is the Perris Boulevard and Ramona Expressway stop, which is approximately 0.5 miles southeast of the Project site.

Metrolink provides heavy-rail, regional transit service to the counties of Los Angeles, San Bernardino, Orange, Ventura, San Diego, and Riverside. The Metrolink stations closest to the Project site are Moreno Valley/March Field Station and the Perris Downtown Metrolink Station; approximately 4.6 miles northwest and 5.1 miles south of the site, respectively.

Greyhound Bus Lines provides private transportation services that link the principal population centers of the County with other regions. This includes east-west service connecting Blythe, Indio, Palm Springs, Banning/Beaumont, and Riverside (via San Bernardino). The service continues westward to downtown Los Angeles and intermediate stops. North-south service connects Riverside with Temecula, continuing southward to San Diego. The number of bus trips in each direction ranges from five to eight per day. (GP 2030 Circulation Element, p. 24.)

1.3 Project Characteristics

The proposed Project includes the following entitlement applications for consideration by the City of Perris:

- Tentative Parcel Map (TPM) 38684: Consolidate the existing seven (7) parcels into one parcel and dedicate portions of the Project site to Harley Knox Boulevard and Indian Avenue Road right-of-way as per **Figure 1.0-8 – Tentative Parcel Map 38684.**
- Development Plan Review (DPR) 22-00016: Develop a 25.10-gross-acre site with a 549,786-square-foot industrial high-cube non-refrigerated speculative warehouse distribution building per **Figure 1.0-9 – Site Plan**. In addition to the 25.10-gross-acre Project site, 1.10 acres of off-site improvements are included.

1.3.1 Proposed Project

The First Industrial Logistics at Harley Knox and Indian Project and off-site improvement area (collectively referred to as proposed Project or Project) involves the merging of seven (7) parcels for the

construction and operation of an approximately 549,786-square-foot non-refrigerated warehouse building including infrastructure, appurtenances, associated parking areas, and associated offsite supporting improvements. The proposed warehouse building would accommodate high-cube warehouse distribution uses, anticipating that approximately 10,000 square-feet could be utilized for supporting office and mezzanine uses. Pursuant to the PVCCSP Guidelines, the building would include solar-ready rooftop panels. The Project would include a total of 94 dock doors on the north side of the building. Based on the employment projection factor for light industrial uses per the PVCCSP the Project is anticipated to create approximately 542 jobs. The proposed Project would be constructed as a speculative or "spec" building; that is, there is not a specific tenant identified at this time. It is anticipated that the building could operate 24 hours a day, seven days a week. The warehouse is not anticipated to include e-commerce.

As shown on **Figure 1.0-10-A – Building Elevations**, **Figure 10-B – Building Elevations**, and **Figure 10-C – Building Elevations,** the design of the building is modern industrial and includes concrete tilt-up wall construction with board-formed cement veneer and standard window glazing. The proposed building height is 48 feet, which would not exceed the City's maximum standard of 50 feet. Consistent with the Perris Municipal Code, Chapter 19.44 Industrial Zones and PVCCSP Chapter 8.2.1.4 Employee Break Areas and Amenities, two outdoor employee break areas with canopies and tables are proposed; one adjacent to the western office and the other adjacent to the eastern office as shown on **Figure 1.0-9**. Additionally, a bocce ball area would be included near the western passenger parking area, to the north of the eastern passenger parking area. Future tenants would provide an indoor employee amenity area as required by the PVCCSP.

Project Site Access

The Project site would be accessed by three driveways, one along Harley Knox Boulevard and two along Indian Avenue as shown on **Figure 1.0-9**. Automobile vehicles would access the Project site via two of the driveways: the driveway along Harley Knox Boulevard and the southerly driveway along Indian Avenue. Trucks would only access the Project site via one driveway: the northerly driveway along Indian Avenue. The trucks would stop at the guard shack to access the loading areas that are located on the northern side of the building. Emergency vehicle access would be available from the northerly Indian Avenue driveway and from the Harley Knox Boulevard driveway. The existing median on Indian Avenue would be modified to allow a left turn to access the Project site's proposed truck driveway. (See **Figure 1.0-9.**) The Indian Avenue northbound lanes would include an approximate 95-foot median transition with an approximate 150-foot left turn pocket so that trucks could access the Project site. The Indian Avenue southbound lanes would be striped for two southbound lanes starting from the Project's frontage to the Indiana Avenue and Harley Knox Boulevard intersection.

Parking

The automobile parking areas would be physically separated from the trucks' path of travel by the building and an 8-foot high manually operated metal gate containing view obscuring mesh and a Knox-pad for emergency vehicle access. This design provides separation between automobile and truck circulation. The Project would provide a total of 188 automobile parking stalls, which includes 147 standard stalls, 5 Americans with Disabilities Act-compliant (ADA) stalls, and 1 ADA van stall. The current site plan shows that 35 standard electric vehicle stalls, 9 electric vehicle charging stations, 1 ADA electric vehicle charging station, 1 van electric vehicle charging station, and 1 ambulatory electric vehicle charging station would be provided. However, these numbers are based on the current requirements of Section 5.106.5.3.1 of the 2022 California Green Building Standards (CALGreen) Code, Title 24, Part 11.

The 2025 CALGreen Code takes effect on January 1, 2026 and the Project would need to provide at least 18 spaces with EV chargers at the time of opening if its building permits are approved after 2025. Automobile parking would be provided on the east and west side of the building near the office areas. The Project also includes 132 trailer parking stalls. Bike racks would also be provided at the Project site for employee use, per PVCCSP guidelines.

Pedestrian Circulation

To avoid potential conflicts between pedestrians walking between the passenger car parking lots and the office areas, the pedestrian paths of travel are provided between passenger vehicle parking areas and the office areas, away from the trucks' path of travel.

Portions of the existing sidewalk along the Project's frontage in Harley Knox Boulevard and Indian Avenue would be removed in order to construct curb and gutter, new sidewalks, and a multipurpose trail per PVCCSP and City standards. Improvements to Harley Knox Boulevard would include a 12-foot-wide parkway multipurpose lane. The multipurpose lane includes a 4-foot pedestrian path (two 2-foot-wide decomposed granite pedestrian paths), and an 8-foot-wide plain cement concrete bicycle path per PVCCSP and City standards. Improvements to Indian Avenue would include a 12-foot parkway multipurpose lane. The multipurpose lane includes a 4-foot pedestrian path, (two 2-foot-wide decomposed granite pedestrian paths), and an 8-foot-wide plain cement concrete bicycle path. In addition to the multipurpose lane, the Project would include a new 4-foot-wide sidewalk and 6-inch-wide mow curb along the Project frontage, as needed. The existing Class II Bike lanes along Harley Knox Boulevard would remain and would be repainted.

Screening and Landscaping

The Project would include screening and landscaping, consistent with City and PVCCSP standards, and include 14-foot-high screen walls and a 8-foot wrought iron fence along the perimeter of the proposed building, as shown on **Figure 1.0-11-A – Screening Details and Figure 11-B – Screening Details**. The proposed landscaping consists of drought-tolerant and climate appropriate trees, shrubs and ground cover that include native species that meet or exceed standards set forth in the PVCCSP as shown on **Figure 1.0-12 – Conceptual Landscape Plan**. The landscape plan is designed to provide visual appeal and screen the views of the passenger vehicle parking lots from public rights-of-way as shown on **Figure 1.0-13 – Line of Sight**.

All roof mounted mechanical equipment would be set back and fully screened from public view behind a parapet. Trash enclosures would be approximately eight feet in height and utilize concrete tilt-up panels consistent with the proposed buildings.

Lighting

Project lighting would include security lights along the buildings and screen walls and pole-mounted lights in the parking areas. All Project-related lighting shall be designed, installed, and operated in conformance with the Perris Municipal Code.

1.3.2 Infrastructure Improvements

Potable Water

The Project would connect to the 12-inch diameter potable water line in Harley Knox Boulevard and the 12-inch diameter potable water line in Indian Avenue for potable water, landscape irrigation, and fire

water pump for fire flow demands. Specifically, a 2-inch lateral connection for potable water, a 2-inch lateral connection for landscape irrigation, and a 12-inch diameter lateral connection for fire services are proposed as shown in **Figure 1.0-14 – Existing and Proposed Utilities**. No offsite potable water line improvements are needed to serve the Project.

Recycled Water

Because there are no existing recycled water lines adjacent to the Project site, other than the capped 12-inch diameter recycled water line in Indian Avenue, recycled water connections are not proposed at this time. As described above, a 2-inch diameter potable water line lateral connection is proposed for landscape irrigation. No offsite recycled water line improvements are needed to serve the Project.

Sewer

The Project includes a proposed 6-inch diameter lateral sewer line to connect to the EMWD's existing 15-inch diameter sewer line in Harley Knox Boulevard. No offsite sewer line improvements are needed to serve the Project.

Storm Drain

The Project applicant proposes onsite curb and gutter and subsurface storm drains that would direct all onsite stormwater and nuisance runoff in subsurface storm drains to underground detention chambers located within the Project site, as shown on (see **Figure 1.0-8**). Following water quality treatment, stormwater would discharge to Lateral B, an earthen channel located north of the Project site, consistent with the Perris Valley Master Drainage Plan. As part of the Project, an outfall structure would be constructed outside of the Project site, within Lateral B, as shown on **Figure 1.0-8**. The outfall structure includes a concrete end wall that would convey onsite stormwater into the Lateral B channel. The outfall structure would also include riprap to dissipate stormwater flows. Because the outfall structure would be constructed within the Perris Valley Storm Drain, the Lateral B connection to this facility would most likely require regulatory permits from the California Department Fish and Wildlife and the Santa Ana Regional Water Quality Control Board. The final design of the outfall structure would be finalized during final engineering

Utilities

Future development of the proposed Project site would require on-site network of water, sewer, storm drain, electric, and gas utility services. Currently there are existing water lines, sewer lines, telecommunications, and electrical lines provided by the purveyors identified in **Table 1.0-B – Utility Purveyors**. As part of the Project, the following utility improvements and relocations would be made:

- Indian Avenue – The two existing power poles along Indian Avenue would be undergrounded, and the streetlight would be relocated within the Indian Avenue right-of-way.

- Harley Knox Boulevard – The existing five (5) streetlights would be relocated within the Harley Knox Boulevard right-of-way.

1.3.3 Offsite Improvements

All potential offsite improvements are associated with pedestrian improvements, road improvements, and the outfall structure are discussed in *Sections 1.3.1 and 1.3.2*.

1.3.4 Construction and Site Preparation

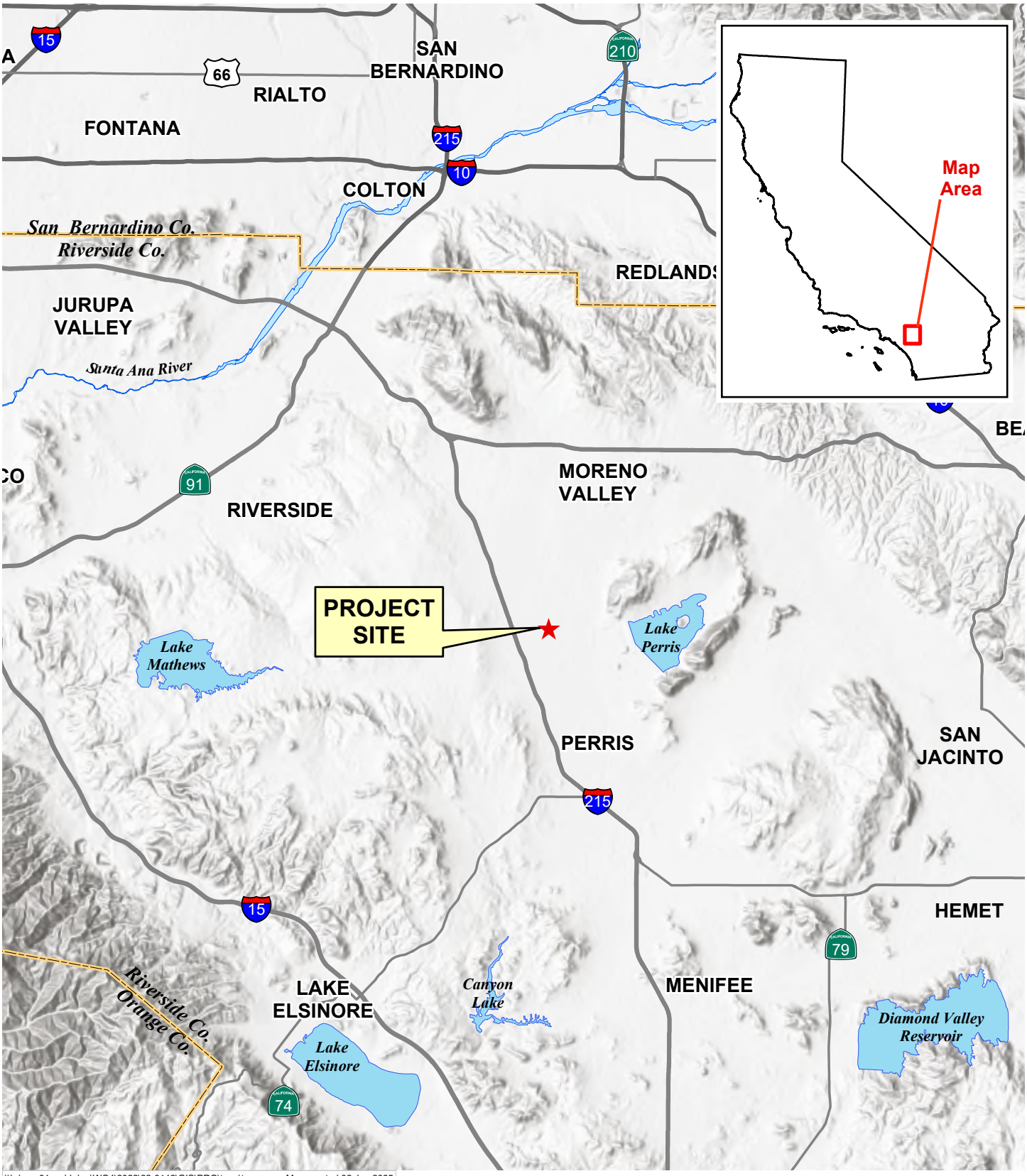
Project site construction would involve grading and earthwork within the Project site boundaries to accommodate the proposed warehouse structure, infrastructure, appurtenances, and associated parking areas as shown on **Figure 1.0-15 – Grading Plan**. The proposed warehouse building includes concrete tilt-up wall construction. Nighttime pouring of concrete is anticipated during summer months. The Project site grading is expected to balance onsite so no soil import or export is anticipated.

Prior to grading operations, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared in accordance with the requirements of the statewide general National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for stormwater discharge from construction sites. The SWPPP would include Project-specific best management practices (BMPs) to reduce erosion and sedimentation and is subject to oversight and enforcement by the City and/or Santa Ana Regional Water Quality Control Board (Regional Water Board). BMPs may include, but not be limited to, soil stabilization controls, perimeter silt fences, placement of hay bales, and use of sediment basins. All erosion and sediment controls would be in accordance with the currently adopted state general permit. The Project developer and construction contractor would be responsible for implementing the BMPs in accordance with the SWPPP.

The Project would be constructed in a single phase for a duration of approximately 11.5 months. For the purposes of the Air Quality/Greenhouse Gas Analysis, construction of the Project was modeled starting in June 2025 which represents a worst-case analysis. The duration of construction activity (and associated equipment) represents a reasonable approximation of the expected construction activities as required per the CEQA Guidelines.

FIGURE 1.0-1

Regional Map



\\brkpan01.webb.lan\WO4\2022\22-0142\GIS\PRO\topo\topo.aprx Map created 02 Jun 2025

ALBERT A. WEBB ASSOCIATES

0 5 10 Miles

Source: Riverside County GIS, 2020

FIGURE 1.0-2

Aerial Map



LEGEND

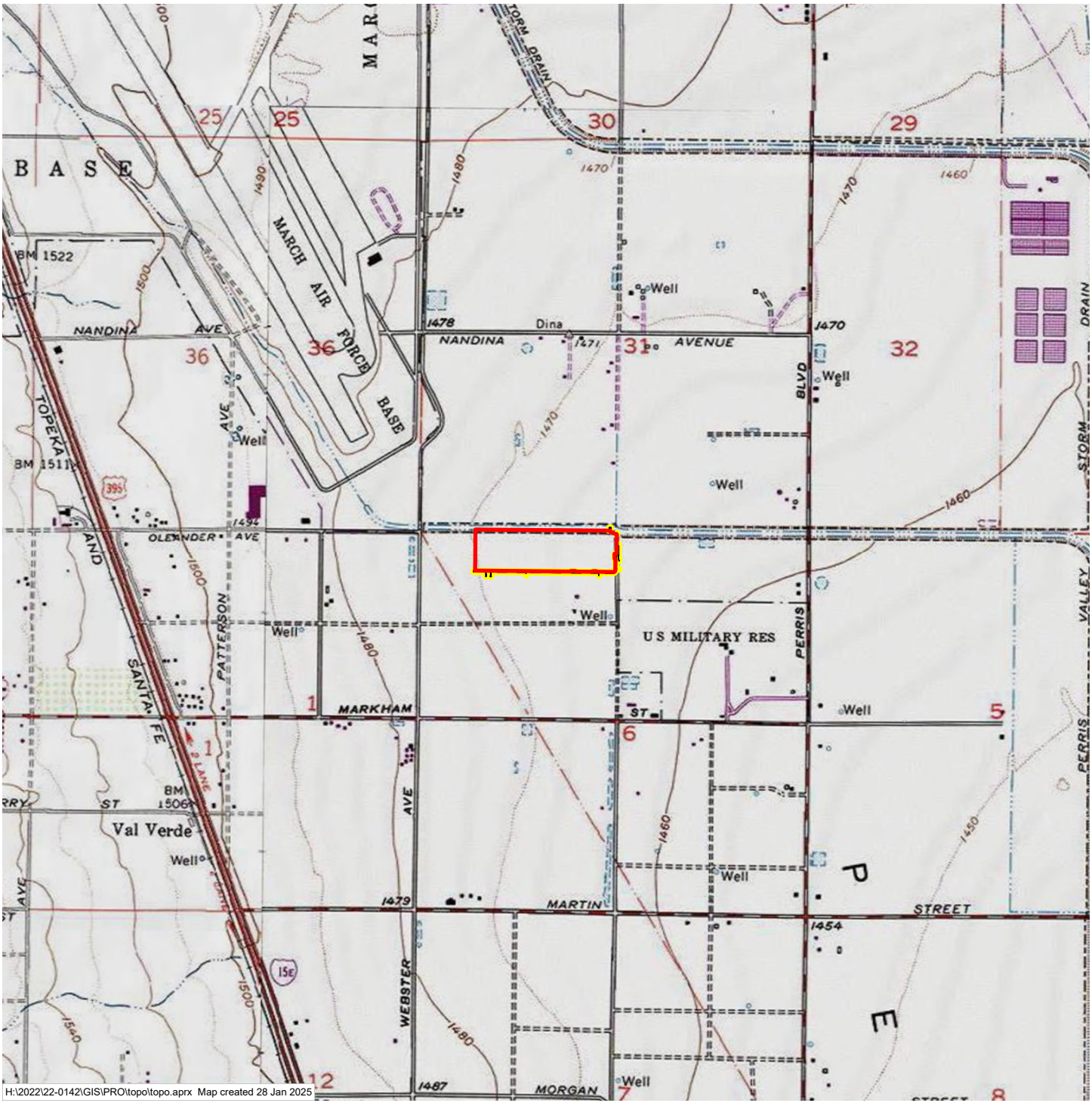
- Project Boundary
- Offsite Disturbance Footprint

0 137.5 275 Feet

Source: Nearmap, 2024.

ALBERT A. WEBB ASSOCIATES

FIGURE 1.0-3 USGS Topographic Map



LEGEND

- Project Boundary
- Offsite Disturbance Footprint

0 1,000 2,000 Feet

Sources: ESRI / USGS 7.5min Quads: Perris, Riverside East, Steele Peak, Sunnymead.

ALBERT A. WEBB ASSOCIATES

FIGURE 1.0-4

Project Site Photographs



SW Corner - Facing North



SW Corner - Facing Northeast



SW Corner - Facing East



SE Corner - Facing West



SE Corner - Facing Northwest



SE Corner - Facing North



NE Corner - Facing West



NE Corner - Facing Southwest

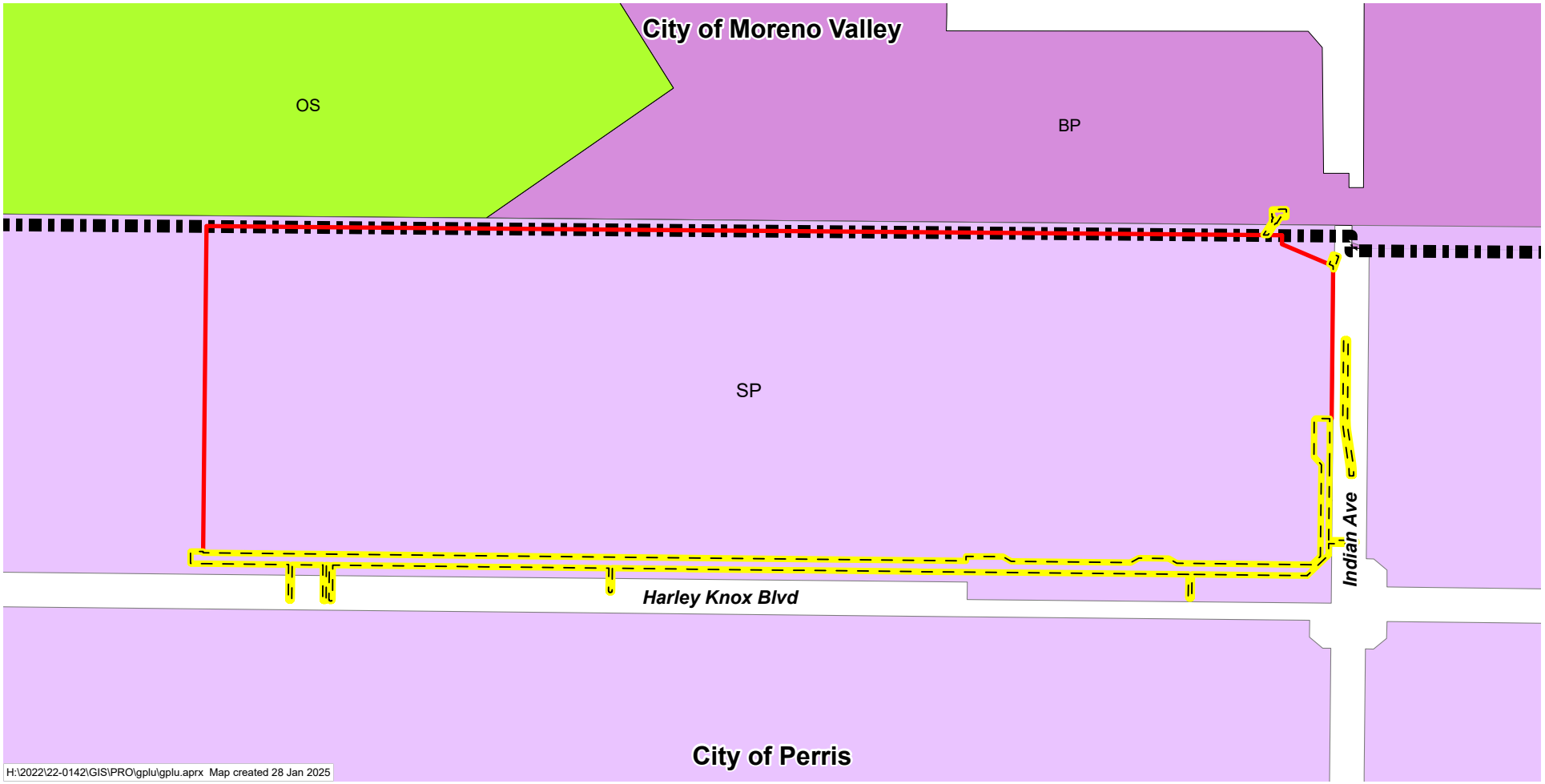


NE Corner - Facing South

ALBERT A. WEBB ASSOCIATES

FIGURE 1.0-5

General Plan Land Use Designation



LEGEND

- Project Boundary
- Offsite Disturbance Footprint

Perris GP Land Use Designation

- PVCC Specific Plan

Moreno Valley GP Land Use Designation

- Business Park/Light Industrial
- Open Space
- Cities

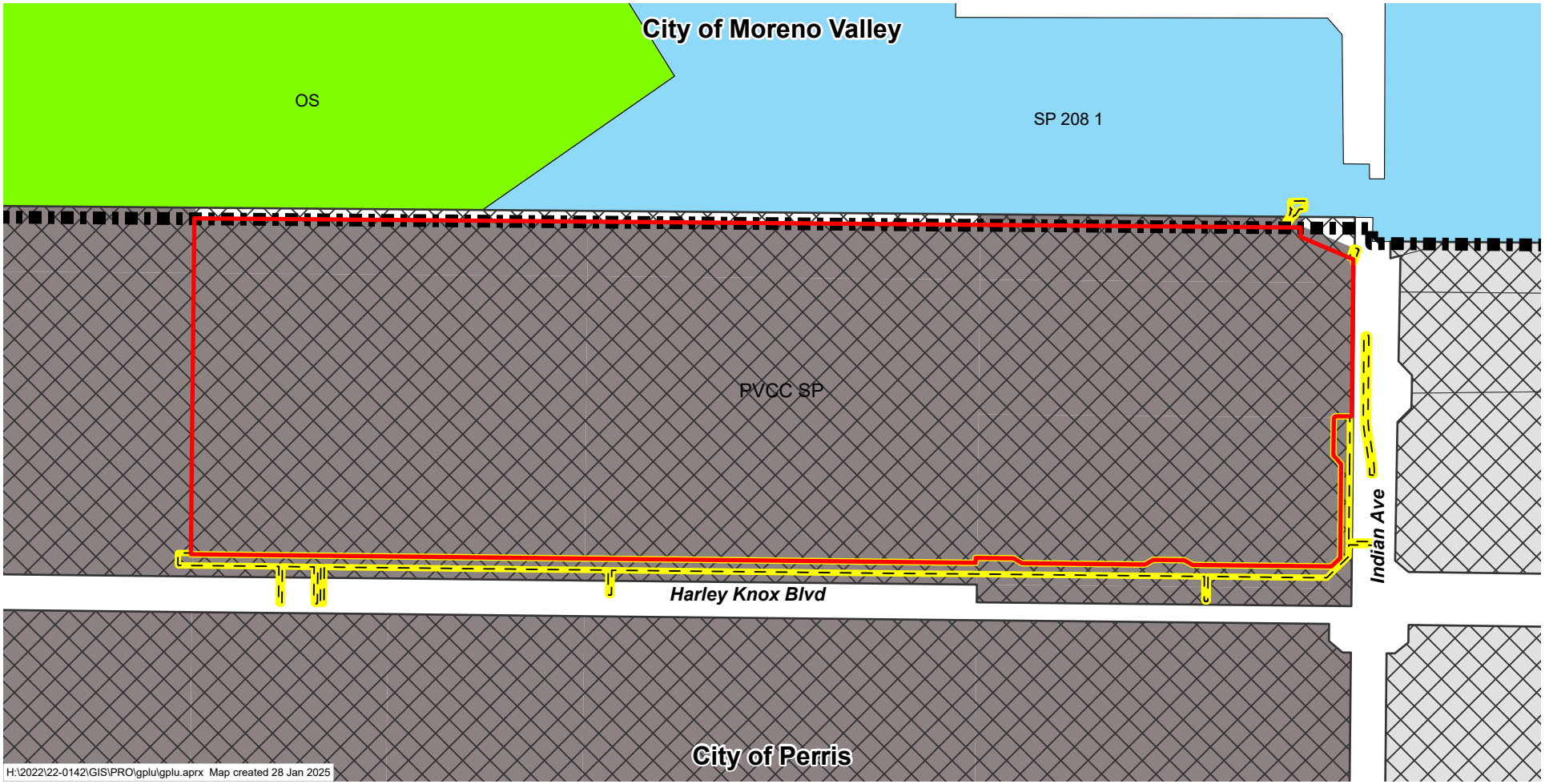
0 140 280 Feet

Sources: City of Perris General Plan Land Use, 2018; City of Moreno Valley, 2019.

ALBERT A. WEBB ASSOCIATES

FIGURE 1.0-6

Specific Plan Zoning Designation



LEGEND

- Project Boundary
- Offsite Disturbance Footprint
- Cities

Moreno Valley Zoning

- Industrial/Business Park
- Open Space/Park

Perris Zoning

- Perris Valley Commerce Center General Industrial SP

PVCCSP Zoning

- Light Industrial
- General Industrial

0 137.5 275 Feet

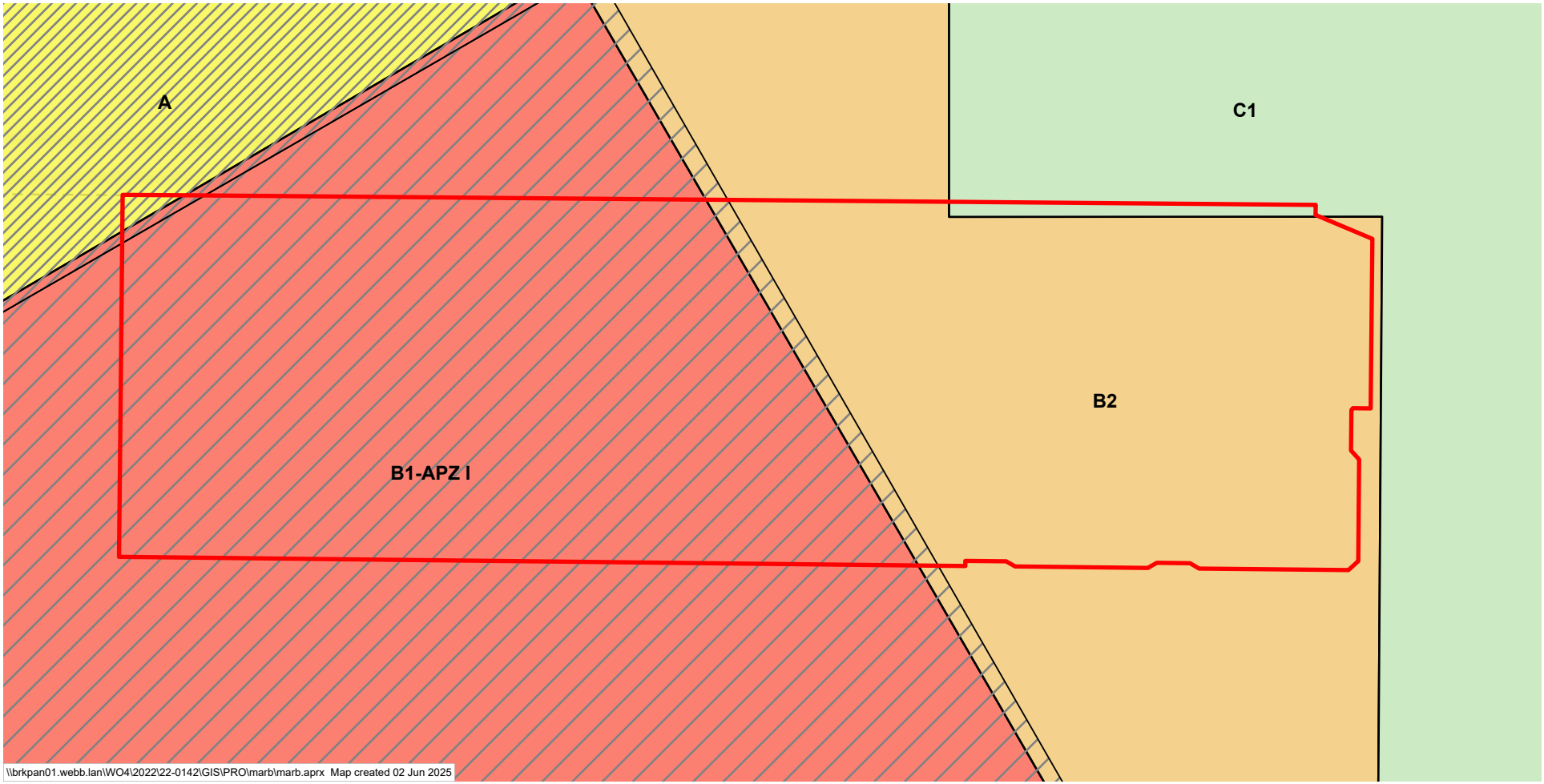
Sources: City of Perris General Plan Land Use, 2010; City of Moreno Valley Zoning, 2022.

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FIGURE 1.0-7

FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

March Air Reserve Base/Inland Port Airport Compatibility Zones



LEGEND

Project Boundary

March Air Reserve Base Airport Compatibility Zones

- Zone A
- Zone B1-APZ I
- Zone B2
- Zone C1

Accident Potential Zones

- Clear Zone
- APZ I

N

0 125 250 Feet

Sources: Accident Potential Zones, 2008; Airport Compatibility Zones, 2024; Nearmap, 2024.

ALBERT A. WEBB ASSOCIATES

FIGURE 1.0-8

Tentative Parcel Map 25-0004 (TPM 38684)

TENTATIVE PARCEL MAP NO. 38684

IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

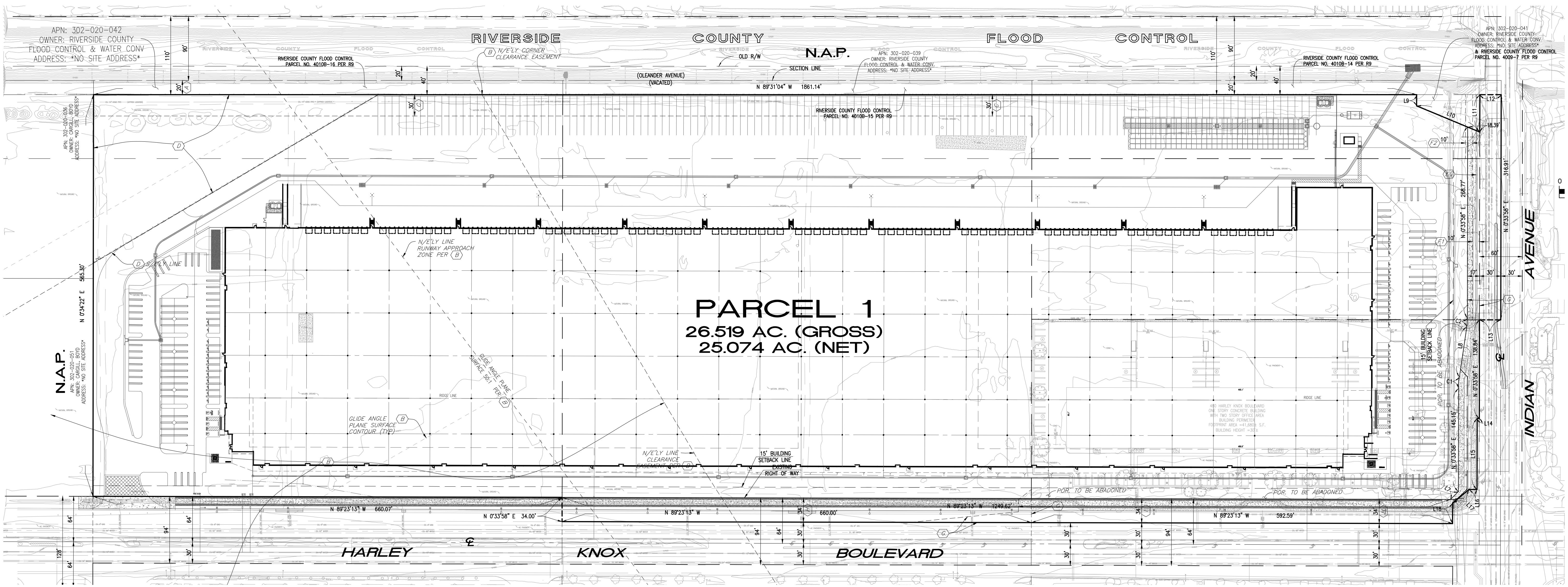
BEING A SUBDIVISION OF PORTIONS OF LOTS 1, 2 AND 3, BLOCK 3 OF RIVERSIDE TRACT, AS PER MAP RECORDED IN BOOK 14, PAGE 668 OF MAPS, RECORDS OF SAN DIEGO COUNTY.

APNs:

302-020-013
302-020-028
302-020-038
302-020-043
302-020-048

NOTES:

DATE OF PREPERATION: 05-25-2022
GROSS ACREAGE: 22.418
NET ACREAGE: 21.580
ANY EXISTING BUILDINGS SHOWN HEREON WILL BE REMOVED
TOTAL OF NUMBERED PARCELS: 1
TOTAL OF LETTERED LOTS: 0



\\brkpan01.webb.lan\WO4\2022\22-0142\GIS\PRO\engineering_templates\engineering_templates.aprx Map created 22 May 2025

NTS

Sources: First Industrial Realty Trust, Inc., HPA Architecture, and Thienes Engineering, Inc., Mar. 20, 2023

ALBERT A. WEBB ASSOCIATES

FIGURE 1.0-9

Site Plan

PROJECT DATA

	BLDG. 2
SITE AREA	
In s.f.	1,094,727 s.f.
In acres	25.13 ac
BUILDING AREA	
Office - 1st floor	5,000 s.f.
Office - 2nd floor	5,000 s.f.
Warehouse	539,786 s.f.
TOTAL	549,786 s.f.
COVERAGE	49.8%
F.A.R. -	0.502
AUTO PARKING REQUIRED	
Office: (office area is less than 10%)	
Whse: 1st 20K @ 1/1,000 s.f.	20 stalls
2nd 20K @ 1/2,000 s.f.	10 stalls
above 40K @ 1/5,000 s.f.	102 stalls
TOTAL	132 stalls
AUTO PARKING PROVIDED	
Standard (9' x 19')	102 stalls
Standard (11' x 19')	42 stalls
Accessible Parking (Standard)(9'x18')	5 stalls
Accessible Parking (Van) (12'x18')	1 stalls
Standard EV Spaces (9' x 19')	32 stalls
Standard EVCS (9' x 19')	9 stalls
Accessible EVCS Parking (Standard) (9'x18')	1 stalls
Accessible EVCS Parking (Van) (12'x18')	1 stalls
Accessible EVCS Parking (Ambulatory) (12'x18'	1 stalls
TOTAL	185 stalls
TRAILER PARKING REQUIRED	
Trailer: 1/5,000 SF	110 stalls
TRAILER PARKING PROVIDED	
Trailer (10' x 55')	132 stalls
ZONING ORDINANCE FOR CITY	
Zoning Designation - Perris Valley Commerce Center - General Industrial	
MAXIMUM BUILDING HEIGHT ALLOWED	
Height - 50'	
MAXIMUM FLOOR AREA RATIO	
FAR - 75	
MAXIMUM LOT COVERAGE	
Coverage - 50%	
LANDSCAPE REQUIREMENT	
Percentage - 10%	109,473 s.f.
LANDSCAPE PROVIDED	
In s.f.	183,438 s.f.
Percentage	16.8%
SETBACKS	
Harley Knox - 15'	
Side/ Rear - none, adjoining R zone- 20'	

SITE PLAN KEYNOTES

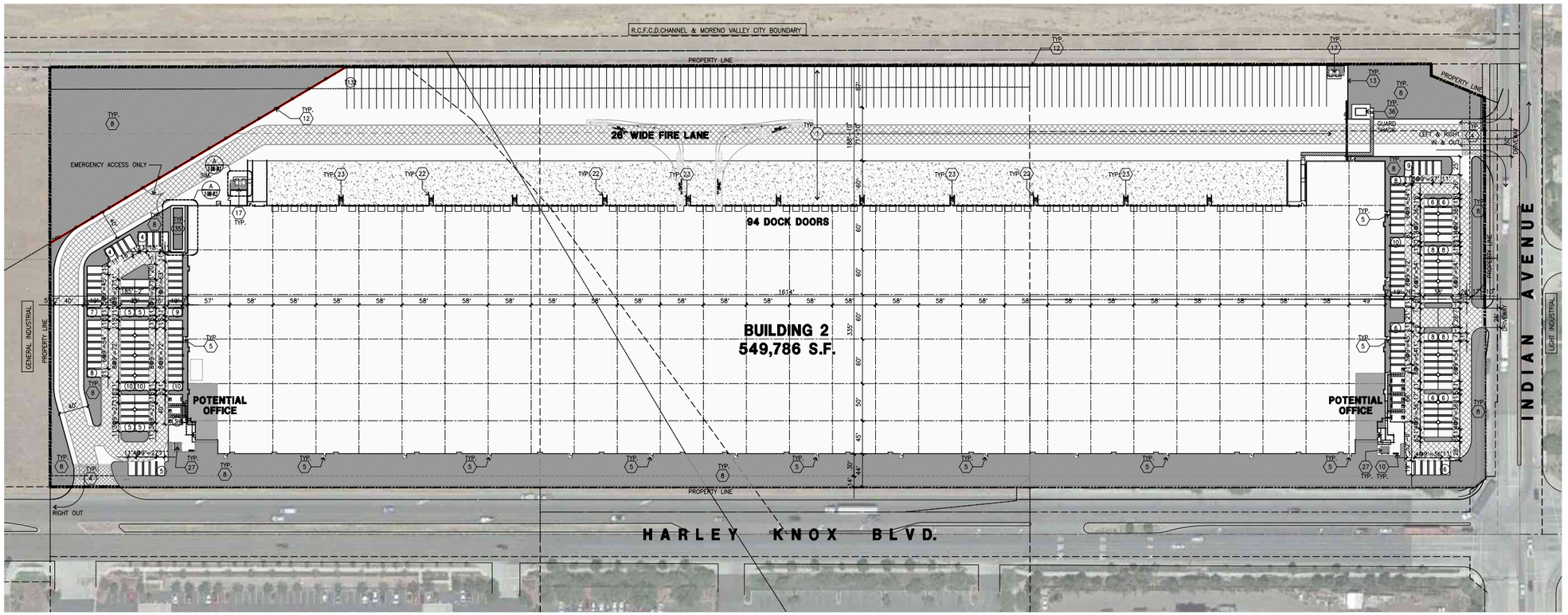
1. HEAVY BROOM FINISH CONC. PAVEMENT.
2. PUMP HOUSE
3. CONCRETE WALKWAY
4. ENHANCED DRIVEWAY APRONS TO BE CONSTRUCTED PER "L" DRAWINGS.
5. 5'-4"x5'-4"x4" MIN. THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. SLOPE TO BE 1/4" : 12" MAX. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY W/ 1:20 MAX. AS REQ. BY CITY INSPECTOR.
6. PROVIDE METAL, MANUAL OPERATED SLIDING GATES W/ PERFORATED SCREEN MESH & KNOX-PAD LOCK PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
7. PROVIDE METAL, MANUAL OPERATED SWING GATES W/ PERFORATED SCREEN MESH & KNOX-PAD LOCK PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
8. LANDSCAPE. SEE "L" DWGS.
9. CONCRETE TILT-UP SCREEN WALL
10. BIKE RACK. PLEASE SEE DETAIL D/DAB-AA.1
11. APPROXIMATE LOCATION OF TRANSFORMER.
12. 8'H WROUGHT IRON FENCE
13. 14' H SCREEN WALL WITH ANTI GRAFFITI COATING
14. ELECTRICAL ROOM
15. PROPOSED SITE LIGHT POLE.
16. PROPOSED STREET LIGHT
17. TRASH ENCLOSURE PER CITY STANDARD.
18. PROPOSED FIRE HYDRANT
19. HANDICAPPED PARKING STALL SIGN
20. HANDICAPPED ENTRY SIGN
21. PRE-CAST CONC. WHEEL STOP
22. CONC. FILLED GUARD POST "6 DIA. U.N.O. 42" H.
23. EXTERIOR CONC. STAIR.
24. CLEAR ZONE. THIS AREA TO BE SECURED FROM ANY OUTDOOR STORAGE AND PARKING. THIS AREA WILL BE UTILIZED FOR ON – SITE DRAINAGE
25. COLOR CONCRETE WITH SCORING LINES AT TRUCK DRIVEWAY
26. EMPLOYEE BREAK AREA WITH PICKLE BALL
27. EMPLOYEE BREAK AREA WITH CANOPY AND TABLE
28. FUTURE INDOOR EMPLOYEE BREAK AREA
29. AUTOMATIC BOOM BARRIER DOUBLE GATE
30. PROPOSED 8' CLASS I MULTIPURPOSE PATH
31. 3' WIDE W SWING GATE W/LOCKSET
32. RAISED PLANTER
33. KNOX BOXES & KNOX DEVICES SHALL BE PROVIDED
34. PROPOSED FIRE DEPT CONNECTION(FDC) LOCATION
35. EMPLOYEE BREAK AREA WITH BOCCE BALL COURT
36. GUARD SHACK

SITE PLAN GENERAL NOTES

1. THE SOILS REPORT PREPARED BY _____ SHOULD BE A PART OF THESE CONTRACT DOCUMENTS.
2. IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM, PRIOR TO INSTALLATION & AT LEAST 60 DAYS BEFORE BLDG. COMPLETION.
6. SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF–SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS.
8. CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. SEE "C"DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY W/ 1:20 MAX. SLOPE. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". SEE "L" DRAWINGS FOR FINISH.
11. PROVIDE TWO FIRE HYDRANT ON THE SITE. FINAL LOCATION WILL DETERMINATE IN DURING SUBMITTAL.
12. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
13. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
14. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
15. NOT USED
16. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
17. NOT USED.
18. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB
19. APPROVED CONCEPTUAL LANDSCAPE PLAN PRIOR TO GRADING PERMIT

SITE LEGEND

- LANDSCAPED AREA
- SITE PAVING – SEE "C" DRWGS. FOR THICKNESS
- CONCRETE PAVING SEE "C" DRWGS. FOR THICKNESS
- STANDARD PARKING STALL (9' X 19')
- HANDICAP PARKING STALL (9' X 19')
- 26' FIRE LANE.
- FIRE LANE RED CURBS
- LIGHT STANDARD
- EXISTING PUBLIC FIRE HYDRANT
- PRIVATE FIRE HYDRANT– APPROXIMATE LOCATION
- PROPERTY LINE
- PATH OF TRAVEL
- TRUCK IN & OUT
- FIRE LANE



PROPERTY OWNER

FIRST INDUSTRIAL REALTY TRUST
898 N. PACIFIC COAST HIGHWAY SUITE 175
EL SEGUNDO, CA 90245
TEL: (310) 414-5400
CONTACT: MICHAEL GOODWIN
MGOODWIN@FIRSTINDUSTRIAL.COM

APPLICANT

FIRST INDUSTRIAL REALTY TRUST
898 N. PACIFIC COAST HIGHWAY SUITE 175
EL SEGUNDO, CA 90245
TEL: (310) 414-5400
CONTACT: MICHAEL GOODWIN
MGOODWIN@FIRSTINDUSTRIAL.COM

APPLICANT'S REPRESENTATIVE

HPA, INC
18831 BARDEEN AVE SUITE 100
IRVINE CA 92612
TEL: 949-862-2116
ATTN: RUBEN CHOI

ADDRESS OF THE PROPERTY

657 HARLEY KNOX BOULEVARD PERRIS, CA

ASSESSOR'S PARCEL NUMBER

302-020-043, 302-020-048,
302-020-013, 302-020-028, 302-020-038
302-020-040, 302-020-032

ZONING

ZONING DESIGNATION - PERRIS VALLEY COMMERCE CENTER
GENERAL INDUSTRIAL

LEGAL DESCRIPTION

REFER TO CIVIL

REFERENCE FOR THE FULL LEGAL DESCRIPTION FOR CONCEPTUAL GRADING PLAN SHEET 1 OF 9

TR 1 ; THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

LOTS IN BLOCK 3 OF RIVERSIDE TRACT, IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 14, PAGE 668 OF MAPS, RECORD OF SAN DIEGO COUNTY.

TR 2 ; THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCEL A: THE NORTH OF ONE HALF OF LOT 1 IN BLOCK 3 OF RIVERSIDE TRACT, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AS SHOWN BY MAP ON FILE IN BOOK 14, PAGE 668 OF MAPS, RECORDS OF SAN DIEGO COUNTY, CALIFORNIA.

PARCEL B: LOT 2 OF BLOCK 3 OF RIVERSIDE TRACT, AS SHOWN BY MAP ON FILE IN BOOK 14 PAGE 668 OF MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.

TR 3 ; REAL PROPERTY IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

LOT 1 IN BLOCK 3 OF RIVERSIDE TRACT, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AS SHOWN BY MAP ON FILE IN BOOK 14, PAGE(S) 668, OF MAPS, RECORDS OF SAN DIEGO COUNTY, CALIFORNIA, EXCEPTING THAT PORTION LYING SOUTH OF THE FOLLOWING DESCRIBED LINE :

BEGINNING AT THE INTERSECTION OF THE SOUTH LINE OF SAID SECTION 31 AND THE EAST LINE OF WEBSTER AVENUE AS SHOWN BY RECORD OF SURVEY ON FILE IN BOOK 64, PAGE 54, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA

TR 4 ; LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

THE SOUTH ½ OF LOT 1 IN BLOCK 3 OF RIVERSIDE TRACT, AS SHOWN BY MAP ON FILE IN BOOK 14, PAGE 668 OF MAPS, RECORDS OF SAN DIEGO COUNTY, EXCEPT THAT PORTION DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHEAST CORNER OF SAID LOT 1, SAID SOUTHEAST CORNER BEING A POINT ON THE WEST LINE OF INDIAN AVENUE, 60.00 FEET WIDE;

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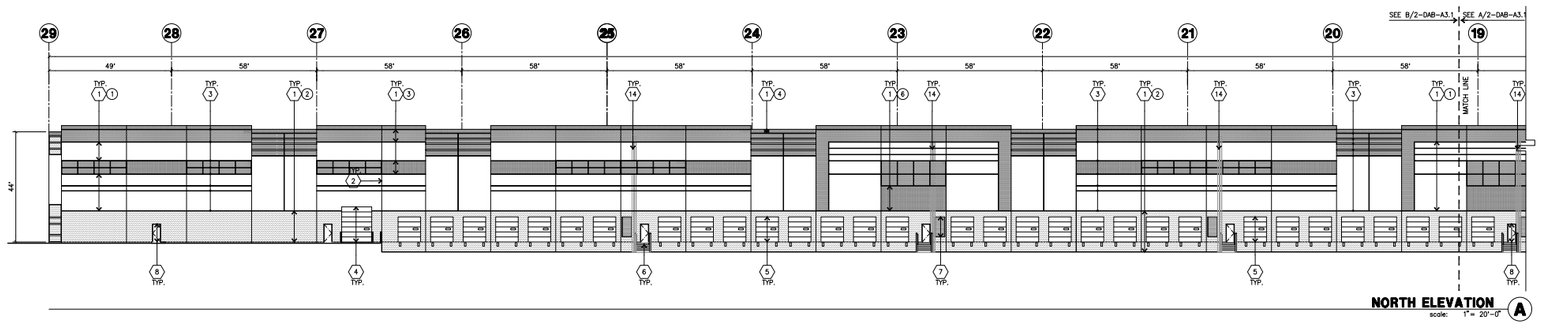
ALBERT A. WEBB ASSOCIATES

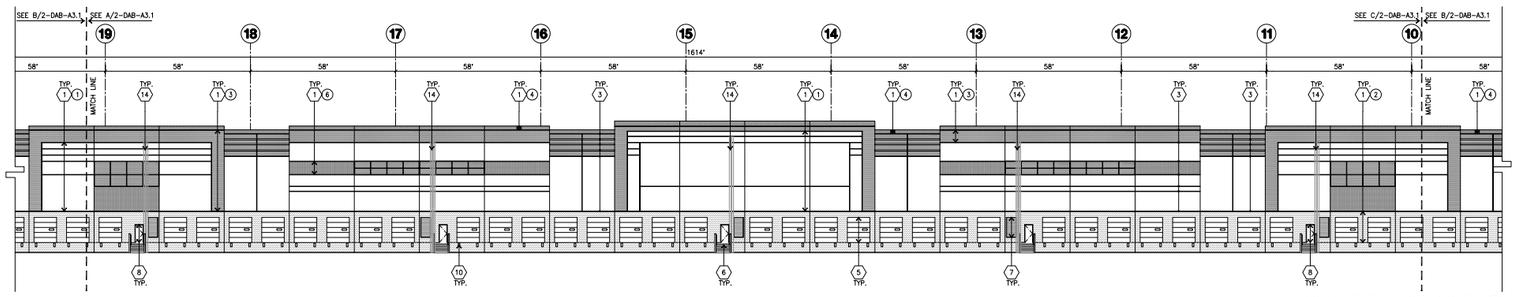
NTS

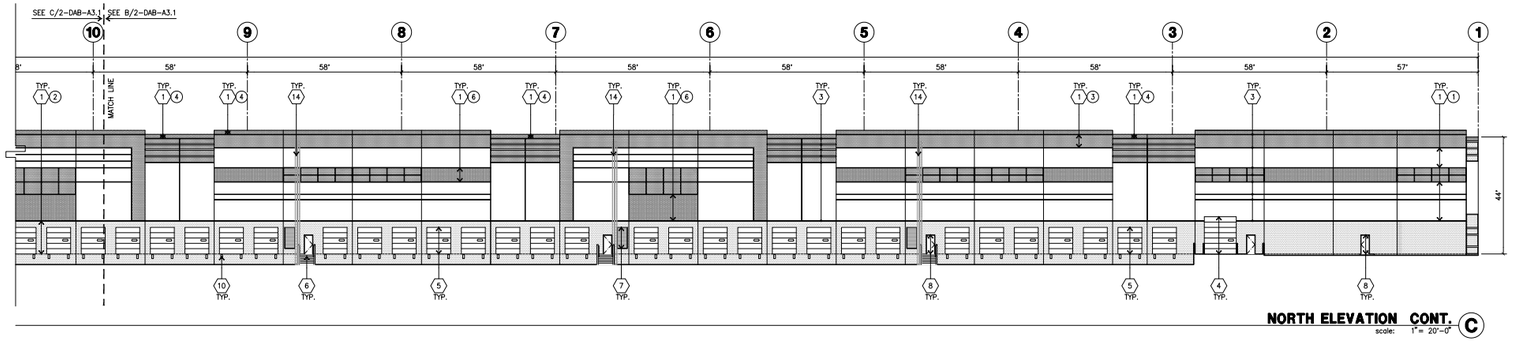
Sources: First Industrial Realty Trust, Inc., HPA Architecture, and Thienes Engineering, Inc., Mar. 20, 2023

FIGURE 1.0-10-A

Building Elevations







KEYNOTES - ELEVATIONS

1. CONCRETE TILT-UP PANEL(PAINTED). FINISH GRADE VARIES. SEE "C" DRAWINGS. WATERPROOF ALL WALLS WHERE GRADE IS HIGHER AND EXPOSED TO THE WEATHER ONE SIDE. WATERPROOFING TO BE PROTECTED WITH PROTECTION BOARD AND A MIN. OF 6" OF GRAVEL. PROVIDE TRENCH DRAIN AT BOTTOM AND DAYLIGHT TO CURB OR TAKE TO STORM DRAIN. NOT REQUIRED AT DOCK HIGH CONDITION OR AT RAMP WALLS.
2. PANEL JOINT.
3. PANEL REVEAL. ALL REVEALS TO HAVE A MAX. OF 3/8" CHAMFER. REVEAL COLOR TO MATCH ADJACENT BUILDING FIELD COLOR. U.N.O.
4. OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
5. OVERHEAD DOOR @ DOCK HIGH. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
6. CONCRETE STAIR, LANDING AND GUARDRAIL W/ METAL PIPE HANDRAIL. PROVIDE NON SKID NOSING TO MEET ADA REQUIREMENTS. PROVIDE CONTRASTING COLORED 3" WIDE WARNING STRIPE INTEGRAL TO CONCRETE AT TOP LANDING AND BOTTOM TREAD PER ADA REQUIREMENTS.
7. METAL LOUVER. PAINT COLOR TO MATCH FIELD COLOR.
8. HOLLOW METAL DOORS. PROVIDE COMPLETE WEATHER STRIPING ALL AROUND DOOR. PROVIDE FOR RAIN DIVERTER ABOVE DOOR.
9. ROOF LINE BEYOND.
10. DOCK BUMPER
11. ALUMINUM STOREFRONT FRAMING WITH TEMPERED GLAZING AT ALL DOORS, SIDELITES ADJACENT TO DOORS AND GLAZING WITH BOTTOMS LESS THAN 18" ABOVE FINISH FLOOR ELEVATION.
12. PARAPET RETURN
13. TUBE STEEL CANOPY
14. INTERIOR ROOF DRAIN WITH OVERFLOW DRAIN
15. INTERIOR ROOF DRAIN WITH OVERFLOW SCUPPERS
16. NOT USED

GENERAL NOTES - ELEVATIONS

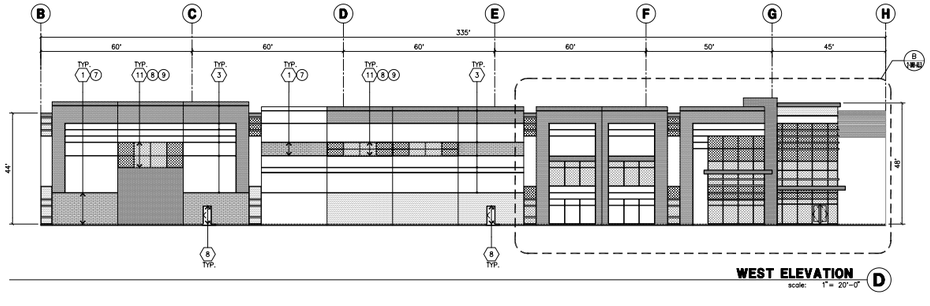
A. ALL PAINT COLOR CHANGES TO OCCUR AT INSIDE CORNERS UNLESS NOTED OTHERWISE.
B. ALL PAINT FINISHES ARE TO BE FLAT UNLESS NOTED OTHERWISE.
C. T.O.P. EL.= TOP OF PARAPET ELEVATION.
D. F.F. = FINISH FLOOR ELEVATION.
E. STOREFRONT CONSTRUCTION: GLASS, METAL ATTACHMENTS AND LINTELS. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS PRIOR TO INSTALLATION.
F. CONTRACTOR SHALL FULLY PAINT ONE CONCRETE PANEL W/ SELECTED COLORS. ARCHITECT AND OWNER SHALL APPROVE PRIOR TO PAINTING REMAINDER OF BUILDING.
G. BACK SIDE OF PARAPETS TO HAVE SMOOTH FINISH AND BE PAINTED WITH ELASTOMERIC PAINT.
H. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH.
J. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
K. THE FIRST COAT OF PAINT TO BE ROLLED-ON AND THE SECOND COAT TO BE SPRAYED-ON

COLOR SCHED. - ELEVATIONS

1. CONCRETE TILT-UP PANEL PAINT BRAND SHERWIN-WILLIAMS SW7005 PURE WHITE
2. CONCRETE TILT-UP PANEL PAINT BRAND SHERWIN-WILLIAMS SW7071 GRAY SCREEN
3. CONCRETE TILT-UP PANEL PAINT BRAND SHERWIN-WILLIAMS SW7073 NETWORK GRAY
4. CONCRETE TILT-UP PANEL PAINT BRAND SHERWIN-WILLIAMS SW7075 WEB GRAY
5. CONCRETE TILT-UP PANEL CORRUGATED METAL WITH DARK GRAY
6. CONCRETE TILT-UP PANEL FORMLINER PAINTED IN SHERWIN -WILLIAMS SW7075 WEB GRAY
7. SPLIT LIMESTONE - BLACK FOREST CORONADO STONE
8. MULLIONS — COLOR CLEAR ANODIZED
9. GLAZING — COLOR BLUE REFLECTIVE GLAZING
10. METAL CANOPY — COLOR SW ACRYLIC LATEX SYSTEMS HIGH GLOSS /HIGH PERFORMANCE 7075 WEB GRAY

GLAZING LEGEND

- TEMPERED SPANDREL GLASS
- TEMPERED VISION GLASS
- TEMPERED VISION INSULATED GLASS PPG: VISTACOOL (2) PACIFICA + SOLARBAN SOLARBAN 60 (3) CLEAR U VALUE: 0.27, SHGC: 0.21 AND VLT: 26% 1" INSULATED GLASS WITH 1/2" AIRSPACE AND (2) 1/4" LITES.



NTS

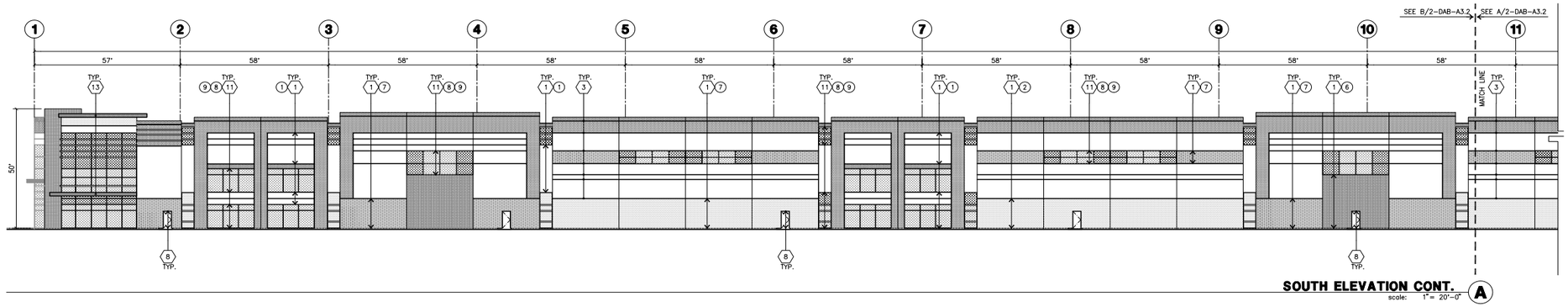
Sources: First Industrial Realty Trust, Inc., HPA Architecture, Inc., and Thienes Engineering, Inc., Mar. 10, 2023.

ALBERT A. WEBB ASSOCIATES

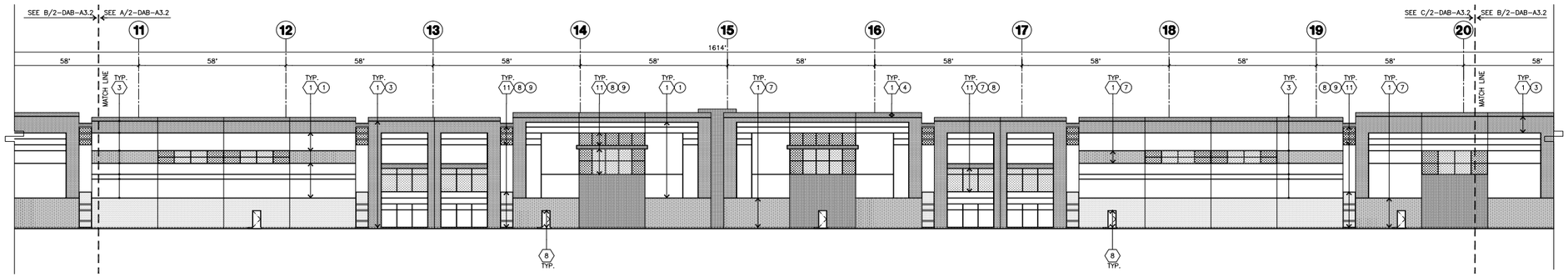
FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 1.0-10-B

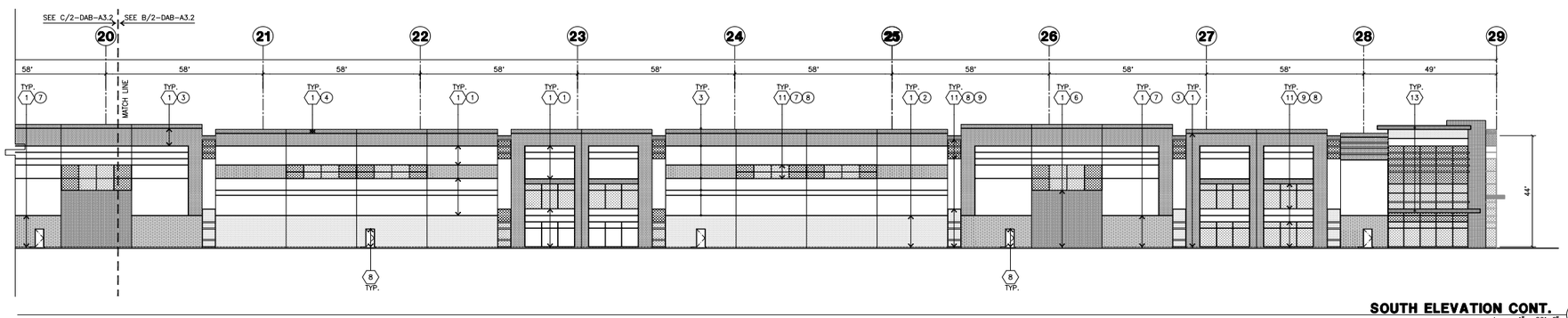
Building Elevations



SOUTH ELEVATION CONT. (A)
scale: 1" = 20'-0"



SOUTH ELEVATION CONT. (B)
scale: 1" = 20'-0"



SOUTH ELEVATION CONT. (C)
scale: 1" = 20'-0"

KEYNOTES - ELEVATIONS

1. CONCRETE TILT-UP PANEL(PAINTED). FINISH GRADE VARIES. SEE "C" DRAWINGS. WATERPROOF ALL WALLS WHERE GRADE IS HIGHER AND EXPOSED TO THE WEATHER ONE SIDE. WATERPROOFING TO BE PROTECTED WITH PROTECTION BOARD AND A MIN. OF 6" OF GRAVEL. PROVIDE TRENCH DRAIN AT BOTTOM AND DAYLIGHT TO CURB OR TAKE TO STORM DRAIN. NOT REQUIRED AT DOCK HIGH CONDITION OR AT RAMP WALLS.
2. PANEL JOINT.
3. PANEL REVEAL. ALL REVEALS TO HAVE A MAX. OF 3/8" CHAMFER. REVEAL COLOR TO MATCH ADJACENT BUILDING FIELD COLOR. U.N.O.
4. OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
5. OVERHEAD DOOR @ DOCK HIGH. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
6. CONCRETE STAIR, LANDING AND GUARDRAIL W/ METAL PIPE HANDRAIL. PROVIDE NON SKID NOSING TO MEET ADA REQUIREMENTS. PROVIDE CONTRASTING COLORED 3" WIDE WARNING STRIPE INTEGRAL TO CONCRETE AT TOP LANDING AND BOTTOM TREAD PER ADA REQUIREMENTS.
7. METAL LOUVER. PAINT COLOR TO MATCH FIELD COLOR.
8. HOLLOW METAL DOORS. PROVIDE COMPLETE WEATHER STRIPING ALL AROUND DOOR. PROVIDE FOR RAIN DIVERTER ABOVE DOOR.
9. ROOF LINE BEYOND.
10. DOCK BUMPER
11. ALUMINUM STOREFRONT FRAMING WITH TEMPERED GLAZING AT ALL DOORS, SIDELITES ADJACENT TO DOORS AND GLAZING WITH BOTTOMS LESS THAN 18" ABOVE FINISH FLOOR ELEVATION.
12. PARAPET RETURN
13. TUBE STEEL CANOPY
14. INTERIOR ROOF DRAIN WITH OVERFLOW DRAIN
15. INTERIOR ROOF DRAIN WITH OVERFLOW SCUPPERS
16. NOT USED

GENERAL NOTES - ELEVATIONS

A. ALL PAINT COLOR CHANGES TO OCCUR AT INSIDE CORNERS UNLESS NOTED OTHERWISE.
B. ALL PAINT FINISHES ARE TO BE FLAT UNLESS NOTED OTHERWISE.
C. T.O.P. EL.= TOP OF PARAPET ELEVATION.
D. F.F. = FINISH FLOOR ELEVATION.
E. STOREFRONT CONSTRUCTION: GLASS, METAL ATTACHMENTS AND LINTELS. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS PRIOR TO INSTALLATION.
F. CONTRACTOR SHALL FULLY PAINT ONE CONCRETE PANEL W/ SELECTED COLORS. ARCHITECT AND OWNER SHALL APPROVE PRIOR TO PAINTING REMAINDER OF BUILDING.
G. BACK SIDE OF PARAPETS TO HAVE SMOOTH FINISH AND BE PAINTED WITH ELASTOMERIC PAINT.
H. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH.
J. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
K. THE FIRST COAT OF PAINT TO BE ROLLED-ON AND THE SECOND COAT TO BE SPRAYED-ON

COLOR SCHED. - ELEVATIONS

1. CONCRETE TILT-UP PANEL PAINT BRAND SHERWIN-WILLIAMS SW7005 PURE WHITE
2. CONCRETE TILT-UP PANEL PAINT BRAND SHERWIN-WILLIAMS SW7071 GRAY SCREEN
3. CONCRETE TILT-UP PANEL PAINT BRAND SHERWIN-WILLIAMS SW7073 NETWORK GRAY
4. CONCRETE TILT-UP PANEL PAINT BRAND SHERWIN-WILLIAMS SW7075 WEB GRAY
5. CONCRETE TILT-UP PANEL CORRUGATED METAL WITH DARK GRAY
6. CONCRETE TILT-UP PANEL FORMLINER PAINTED IN SHERWIN -WILLIAMS SW7075 WEB GRAY
7. SPLIT LIMESTONE – BLACK FOREST CORONADO STONE
8. MULLIONS COLOR CLEAR ANODIZED
9. GLAZING COLOR BLUE REFLECTIVE GLAZING
10. METAL CANOPY COLOR SW ACRYLIC LATEX SYSTEMS HIGH GLOSS /HIGH PERFORMANCE 7075 WEB GRAY

GLAZING LEGEND

- TEMPERED SPANDREL GLASS
- TEMPERED VISION GLASS
- TEMPERED VISION INSULATED GLASS PPG: VISTACOOL (2) PACIFICA + SOLARBAN SOLARBAN 60 (3) CLEAR U VALUE: 0.27, SHGC: 0.21 AND VLT: 26% 1" INSULATED GLASS WITH 1/2" AIRSPACE AND (2) 1/4" LITES.

NTS

Sources: First Industrial Realty Trust, Inc., HPA Architecture, Inc., and Thienes Engineering, Inc., Mar. 10, 2023.

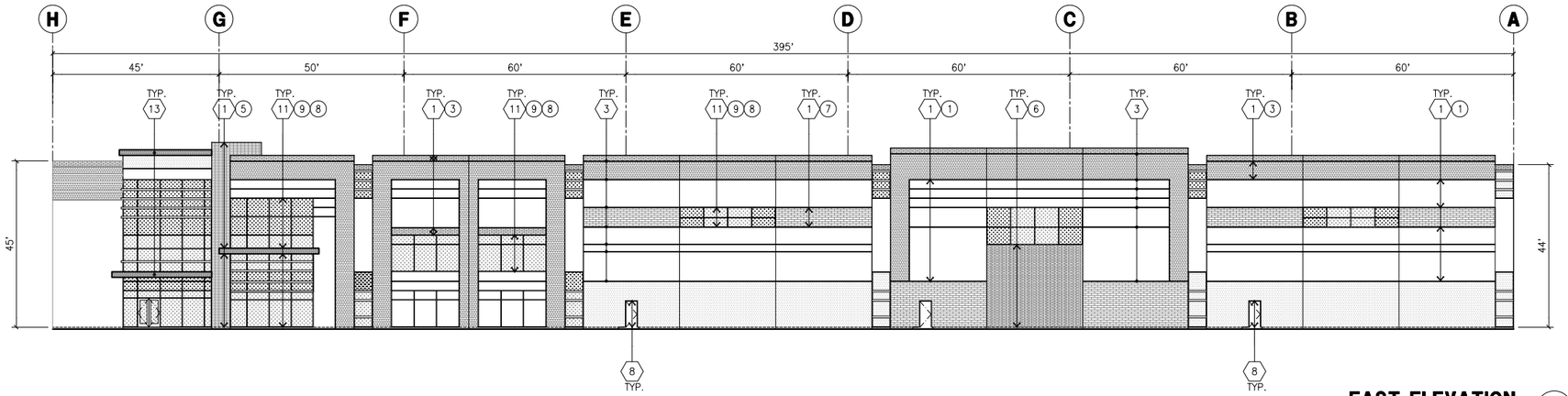
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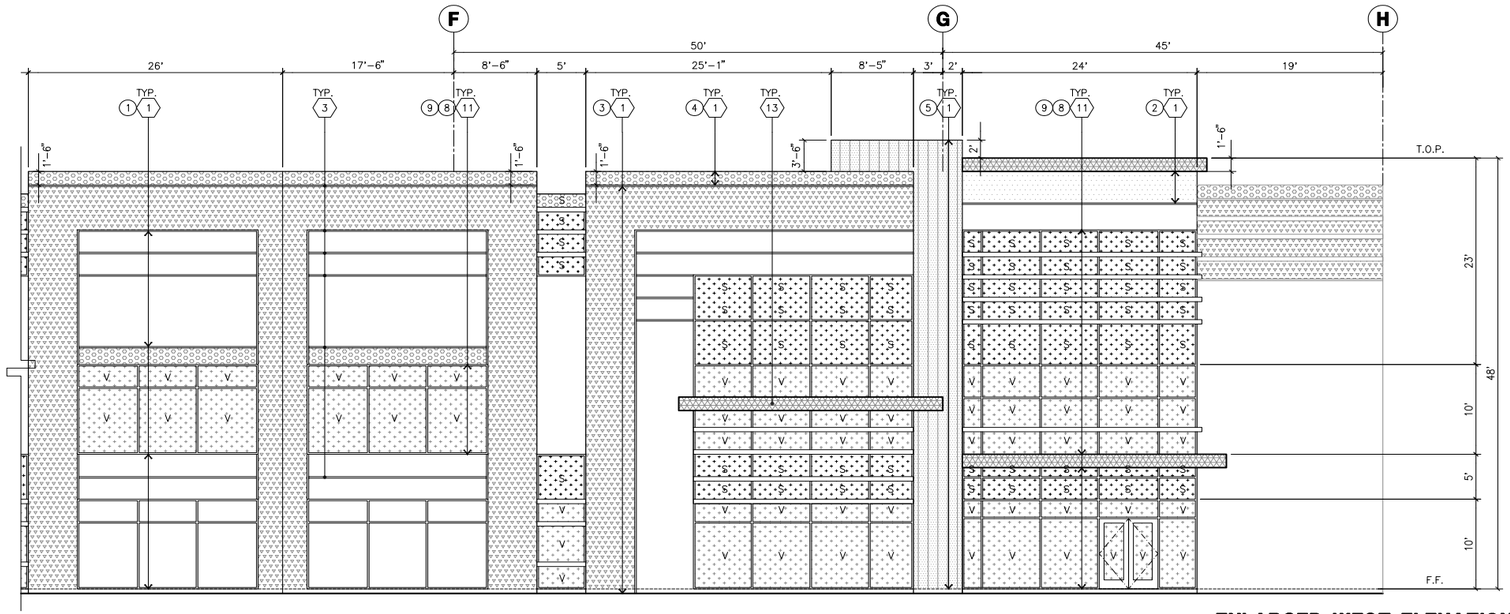
FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 1.0-10-C

Building Elevations



EAST ELEVATION **A**
scale: 1" = 20'-0"



ENLARGED WEST ELEVATION **B**
scale: 1/8" = 1'-0"

KEYNOTES - ELEVATIONS

1. CONCRETE TILT-UP PANEL(PAINTED). FINISH GRADE VARIES. SEE "C" DRAWINGS. WATERPROOF ALL WALLS WHERE GRADE IS HIGHER AND EXPOSED TO THE WEATHER ONE SIDE. WATERPROOFING TO BE PROTECTED WITH PROTECTION BOARD AND A MIN. OF 6" OF GRAVEL. PROVIDE TRENCH DRAIN AT BOTTOM AND DAYLIGHT TO CURB OR TAKE TO STORM DRAIN. NOT REQUIRED AT DOCK HIGH CONDITION OR AT RAMP WALLS.
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NTS

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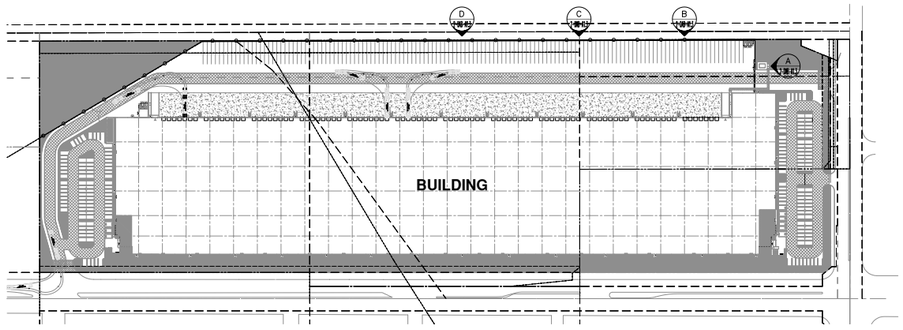
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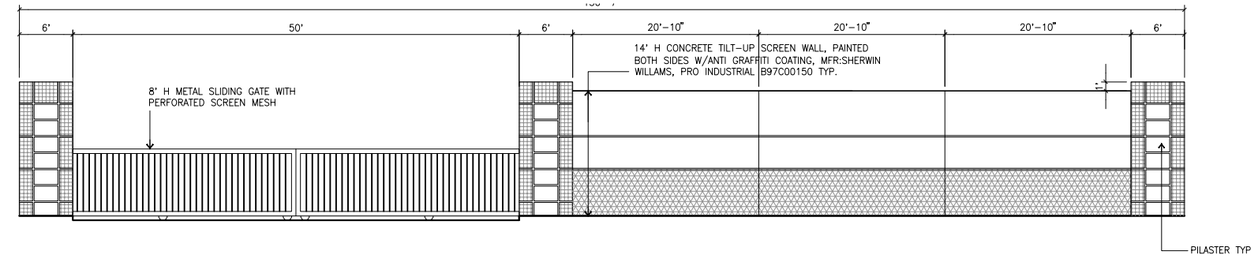
FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 1.0-11-A

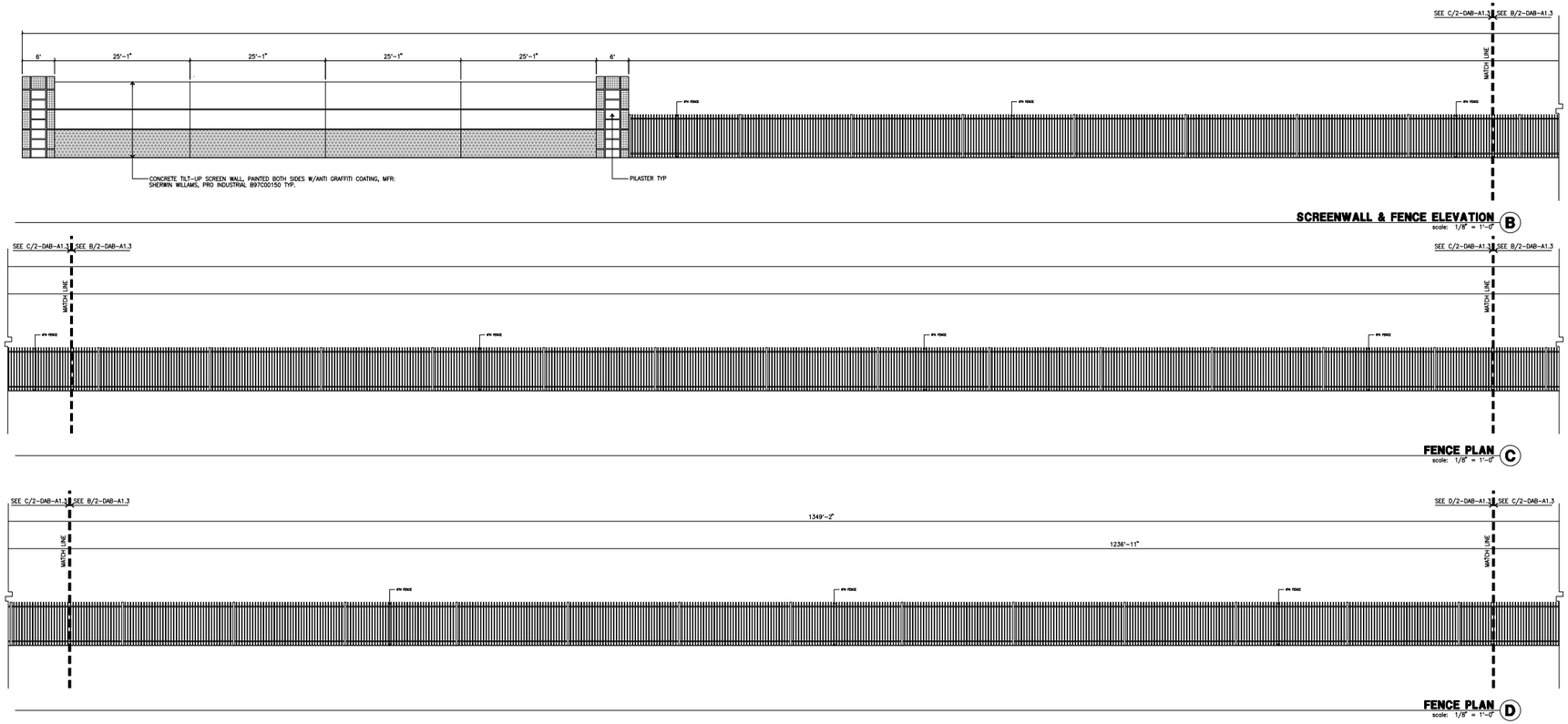
Screening Details

KEYMAP





SCREENWALL ELEVATION (A)
scale: 1/8" = 1'-0"



SCREENWALL & FENCE ELEVATION (B)
scale: 1/8" = 1'-0"

FENCE PLAN (C)
scale: 1/8" = 1'-0"

FENCE PLAN (D)
scale: 1/8" = 1'-0"

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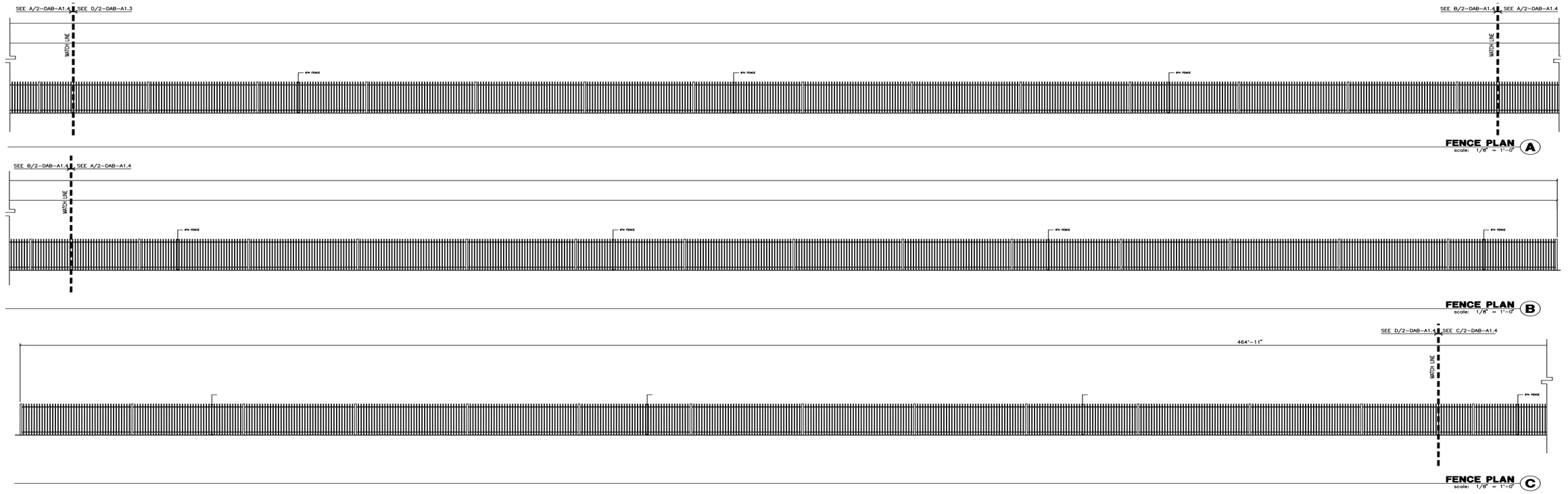
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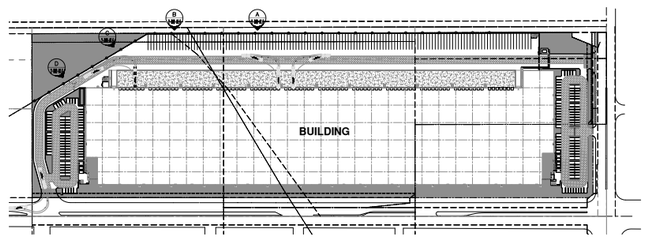
FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

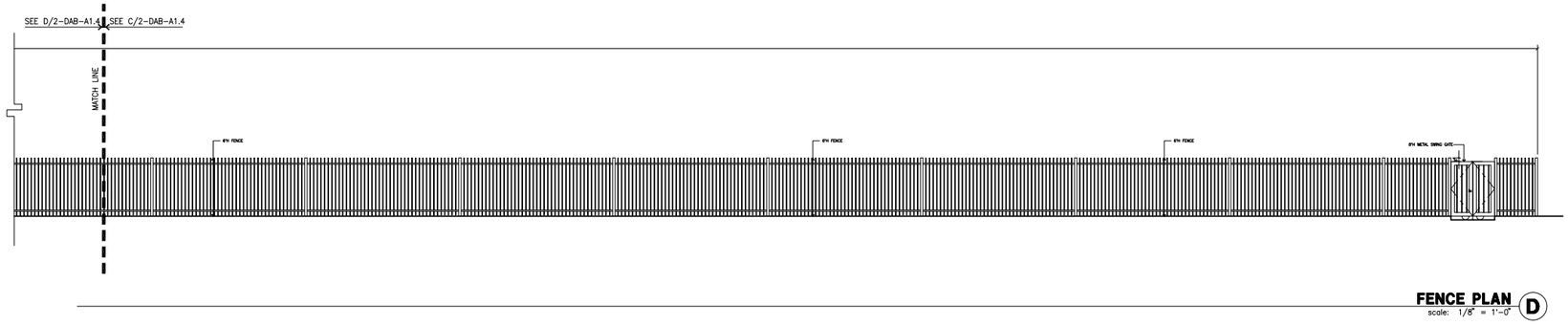
FIGURE 1.0-11-B

Screening Details



KEYMAP





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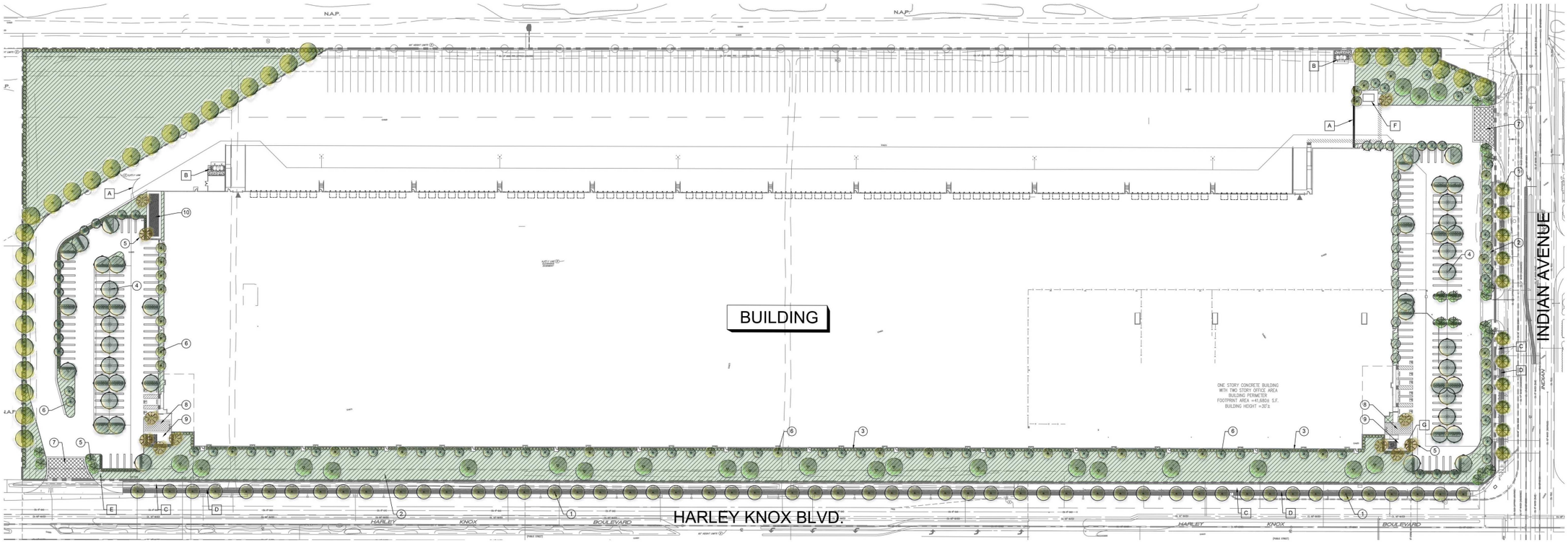
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ALBERT A. WEBB ASSOCIATES

FIGURE 1.0-12

Conceptual Landscape



PLANTING LEGEND

TREES

SYMBOL	TREE NAME	QTY.	WUCOLS
	PROPOSED STREET TREE ALONG HARLEY KNOX BLVD. PLATANUS RACEMOSA, CALIFORNIA SYCAMORE 24" BOX SIZE. STANDARD TRUNK	53	M
	PROPOSED STREET TREE ALONG INDIAN AVE. QUERCUS AGRIFOLIA, COAST LIVE OAK 36" BOX SIZE. STANDARD TRUNK	11	L
	OLEA E. 'WILSONII', FRUITLESS OLIVE TREE 36" BOX SIZE. STANDARD TRUNK.	23	L
	PARKING LOT SCREEN TREE QUERCUS ILEX, HOLLY OAK 24" BOX SIZE. STANDARD TRUNK.	44	L
	VERTICAL TREE ALONG BUILDING PINUS ELDARICA, MONDELL PINE 24" BOX SIZE. STANDARD TRUNK.	34	L
	FLOWERING ACCENT TREE AT PROJECT ENTRY LAGERSTROEMIA I. 'WATERMELON RED', CRAPE MYRTLE 24" BOX SIZE. STANDARD TRUNK.	19	M
	FLOWERING ACCENT TREE AT BUILDING CERCIDIUM F. 'DESERT MUSEUM', BLUE PALO VERDE 24" BOX SIZE	11	L
	PARKING LOT SCREEN TREE QUERCUS VIRGINIANA, SOUTHERN LIVE OAK 24" BOX SIZE. STANDARD TRUNK.	32	M
	VERTICAL SCREEN TREE AT BUILDING TRISTANIA CONFERTA, BRISBANE BOX 24" BOX SIZE	13	M
	VERTICAL SCREEN TREE PINUS ELDARICA, MONDELL PINE 24" BOX SIZE	78	L

GROUND COVERS

SYMBOL	NAME	WUCOLS
	ROSMARINUS O. 'PROSTRATUS', CREEPING ROSEMARY 1 GAL. SIZE @ 30" O.C	L
	LANTANA CAMARA 'DWARF GOLD', DWARF LANTANA 1 GAL. SIZE @ 30" O.C.	L
	MUHLENBERGIA RIGENS, DEER GRASS 1 GAL. SIZE @ 42" O.C.	M
	SALVIA CLEVLANDII, CLEVLAND SAGE 5 GAL. SIZE @ 48" O.C.	L
	DIANELLA TASMANICA 'VARIEGATA', WHITE STRIPED TASMAN FLAX LILY 1 GAL. SIZE @ 24" O.C.	M
	LONICERA J. 'HALLIANA', HALL'S HONEYSUCKLE 1 GAL. SIZE @ 24" O.C.	L
	CARISSA MACROCARPA 'GREEN CARPET', NATAL PLUM 1 GAL. SIZE @ 30" O.C.	M
	SALVIA LEUCANTHA, MEXICAN BUSH SAGE 5 GAL. SIZE @ 42" O.C.	L
	AGAVE 'BLUE FLAME', BLUE FLAME AGAVE 5 GAL. SIZE @ 36" O.C.	L
	LEYMUS C. 'CANYON PRINCE', CANYON PRINCE WILD RYE 1 GAL. SIZE @ 36" O.C.	L
	DIETES BICOLOR, FORTNIGHT LILY 1 GAL. SIZE @ 24" O.C	M
	VERBENA 'DE LA MINA', DE LA MINA VERBENA 1 GAL. SIZE @ 24" O.C.	L

NOTE: APPLY A 3" MIN. LAYER OF MULCH TOP DRESSING WITHIN ALL PLANTING AREAS. A SAMPLE IS REQUIRED PRIOR TO APPLICATION.

SHRUBS - SHRUBS SHALL BE CHOSEN FROM THE FOLLOWING:

SYMBOL	NAME	WUCOLS
	DODONAEA V. 'PURPUREA', PURPLE HOPSEED BUSH 5 GAL. SIZE	L
	WESTRINGIA FRUTICOSA, COAST ROSEMARY 5 GAL. SIZE	L
	LIGUSTRUM TEXANUM, TEXAS PRIVET 5 GAL. SIZE	L
	LEUCOPHYLLUM FRUTESCENS, TEXAS RANGER 5 GAL. SIZE	L
	CALLISTEMON 'LITTLE JOHN', DWARF BOTTLE BRUSH 5 GAL. SIZE	L

DESIGN KEY NOTES:

1. STREET TREE PER PLANTING LEGEND.
2. TYP. LAYERED ACCENT PLANTING ALONG STREET FRONTAGE (LOW-GROWING).
3. FOUNDATION SHRUB ALONG BUILDING PER PLANTING LEGEND.
4. EVERGREEN PARKING LOT CANOPY TREE (LOW-LITTER TYPE).
5. FLOWERING ACCENT PLANT AT FOCAL AREAS PER PLANTING LEGEND.
6. VERTICAL SCREEN TREE PER PLANTING LEGEND.
7. ENHANCED VEHICULAR PAVING AT DRIVEWAY AREAS. INTEGRAL COLORED CONCRETE WITH MEDIUM ETCH FINISH.
8. ENHANCED ENTRY PAVING. INTEGRAL COLORED CONCRETE.
9. OUTDOOR SEATING AREA CONSISTING OF INTEGRAL COLOR CONCRETE AND SITE FURNITURE.
10. EMPLOYEE BREAK AREA WITH BALL COURT.

REFERENCE NOTES:

- A GATE PER ARCH. PLANS.
- B TRASH ENCLOSURE PER ARCH. PLANS.
- C ALL PURPOSE TRAIL PER CIVIL PLANS.
- D DECOMPOSED GRANITE.
- E SIGNAGE PER ARCH. PLANS.
- F GUARDHOUSE PER ARCH. PLANS.
- G BIKE RACK PER ARCH. PLANS.

CONCEPTUAL PLAN NOTE:

THIS IS A CONCEPTUAL LANDSCAPE PLAN. IT IS BASED ON PRELIMINARY INFORMATION WHICH IS NOT FULLY VERIFIED AND MAY BE INCOMPLETE. IT IS MEANT AS A COMPARATIVE AID IN EXAMINING ALTERNATE DEVELOPMENT STRATEGIES AND ANY QUANTITIES INDICATED ARE SUBJECT TO REVISION AS MORE RELIABLE INFORMATION BECOMES AVAILABLE.

IRRIGATION NOTE:

THE PROJECT WILL BE EQUIPPED WITH A LOW FLOW IRRIGATION SYSTEM CONSISTING OF ET WEATHER BASED SMART CONTROLLER, LOW FLOW ROTORS, BUBBLER AND/ OR DRIP SYSTEMS USED THROUGHOUT. THE IRRIGATION WATER EFFICIENCY WILL MEET OR SURPASS THE CURRENT STATED MANDATED AB-1881 WATER ORDINANCE.

GENERAL NOTES:

- ROCK RIP-RAP MATERIAL SHALL BE INSTALLED WHERE DRAIN LINES CONNECT TO INFILTRATION AREAS.
- ALL UTILITY EQUIPMENT SUCH AS BACKFLOW UNITS, FIRE DETECTOR CHECKS AND FIRE CHECK VALVES WILL BE SCREENED WITH EVERGREEN PLANT MATERIAL ONCE FINAL LOCATIONS HAVE BEEN DETERMINED.

LANDSCAPE DATA

TOTAL SITE AREA = 320,750 SQ. FT. (7.36 ACRES)
LANDSCAPE AREA REQUIRED = 11,298 SQ. FT. (15%)
LANDSCAPE AREA PROVIDED = 39,319 SQ. FT. (52.2%)

WUCOLS PLANT FACTOR

THIS PROJECT IS LOCATED IN 'WUCOLS' REGION '4-SOUTH INLAND VALLEY".

H = HIGH WATER NEEDS
M = MODERATE WATER NEEDS
L = LOW WATER NEEDS
VL= VERY LOW WATER NEEDS

NTS

Sources: First Industrial Realty Trust, Inc., HPA Architecture, and Thienes Engineering, Inc., Mar. 20, 2023

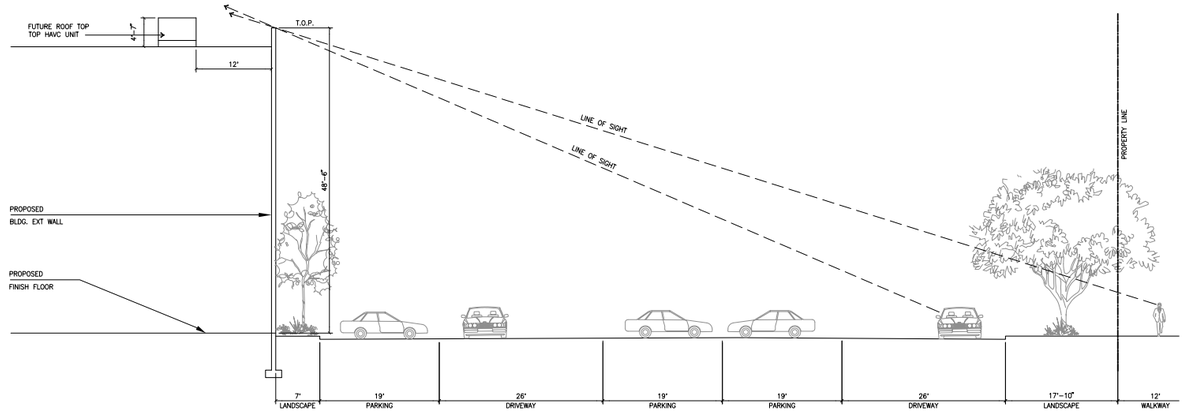
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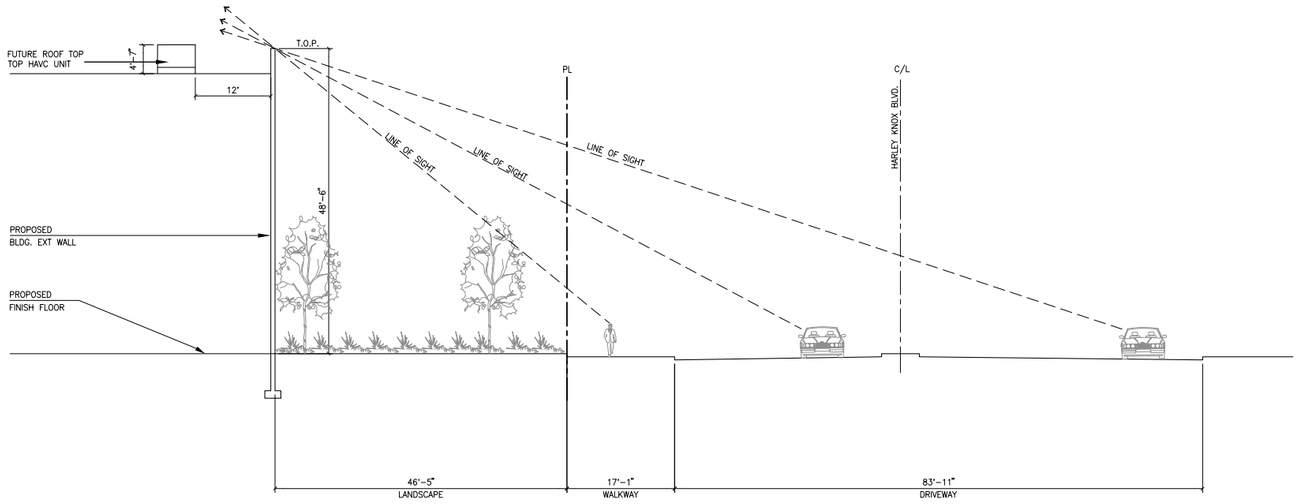
FIRST INDUSTRAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 1.0-13

Line of Sight



SITE SECTION STUDY A
scale: 1"= 10'-0"



SITE SECTION STUDY B
scale: 1"= 10'-0"

NTS

Sources: First Industrial Realty Trust, Inc., HPA Architecture, and Thienes Engineering, Inc., Mar. 20, 2023

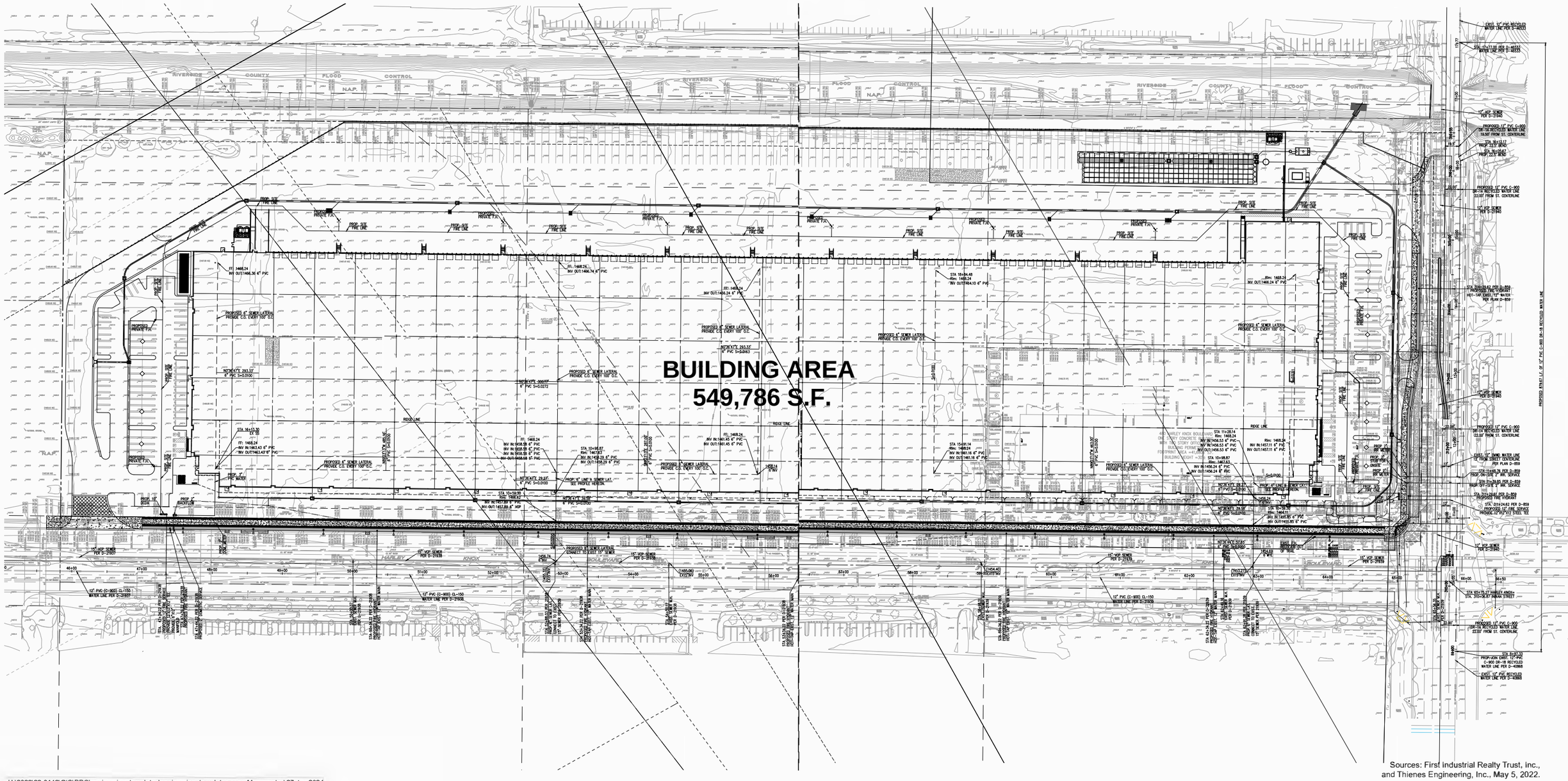
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FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 1.0-14

Existing and Proposed Utilities



Sources: First Industrial Realty Trust, Inc., and Thienes Engineering, Inc., May 5, 2022.

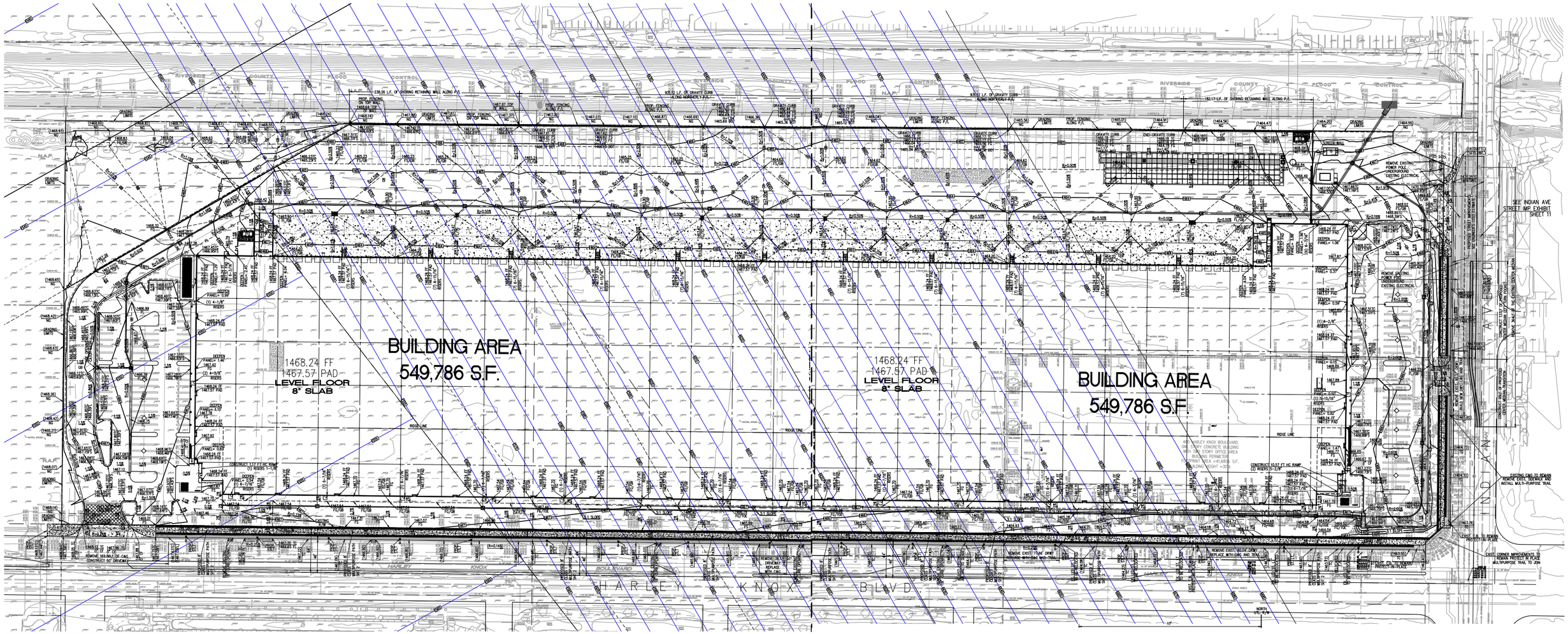
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ALBERT A. WEBB ASSOCIATES

FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 1.0-15

Grading Plan



3/16/2023

EARTHWORK BALANCE CALCULATIONS

PROJECT: First Industrial Harley Knox
JOB# 4066 - Option A

K.	SITE AREA:	1,089,873	SF
L.	SUBSIDENCE FACTOR:	0.13	FT
M.	SHRINKAGE FACTOR:	10.0	%
N.	SITE STRIPPING FACTOR:	0.04	
O.	OVEREXCAVATION:	94,550	CY
A.	CALCULATED CUT:	37,898	CY
B.	FOOTING AND ONSITE UTILITY SPOILS	7,837	CY
Ba	OFFSITE SPOILS (STREET AND UTILITIES)	-	
C.	**TOTAL CUT: (A+B)**	45,735	CY
D.	CALCULATED FILL:	24,958	CY
E.	LIGHT PAVING FILL:	-	CY
F.	SUBSIDENCE: (L*K/27)=	5,069	CY
G.	SHRINKAGE: (M/100)C=	4,594	CY
H.	SITE STRIPPING	1,615	
I.	OVEREXCAVATION SHRINKAGE	9,498	CY
J.	**TOTAL FILL: (D+E+F+G+H)=**	45,735	CY
Q.	**TOTAL (IMPORT) OR EXPORT:**	(0)	CY
	SITE ADJUSTMENT	(0.00)	

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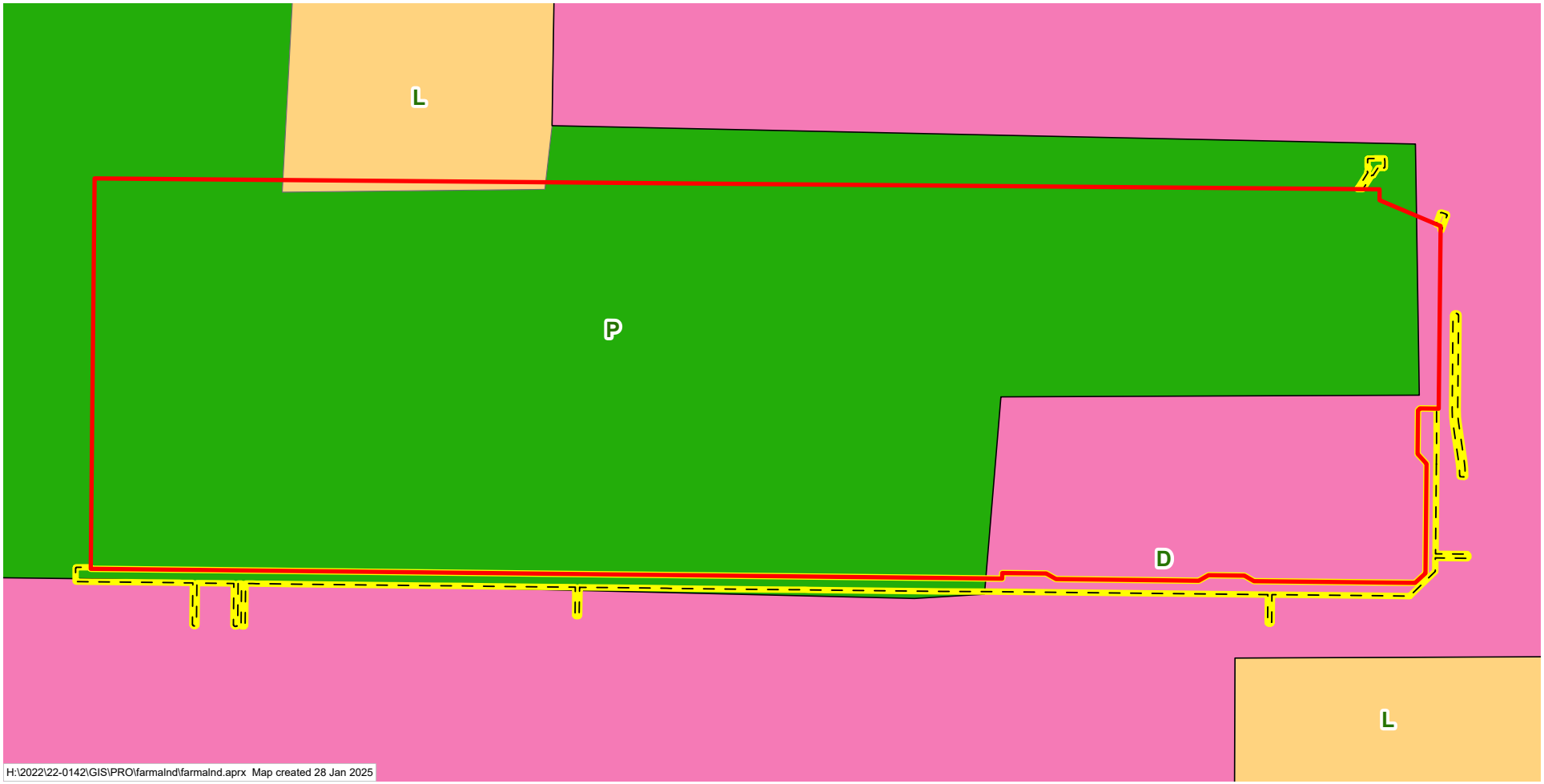
NTS

Sources: First Industrial Realty Trust, Inc., HPA Architecture, and Thienes Engineering, Inc., Mar. 20, 2023

ALBERT A. WEBB ASSOCIATES

FIGURE 1.0-16

Farmland Map



LEGEND

- Project Boundary
- Offsite Disturbance Footprint

Designations

- P - Prime Farmland
- L - Farmland of Local Importance
- D - Urban and Built Up Land

0 115 230 Feet

Sources: California Department of Conservation, Farmland Mapping and Monitoring Program, 2020.

ALBERT A. WEBB ASSOCIATES

1.4 Sustainability Features

The Project would meet or exceed all applicable standards under the CALGreen Code and the Building Energy Efficiency Standards contained in Title 24 in effect at the time that the building permits are issued. The Project is proposed to implement concepts of efficient design and material use that are consistent with Silver LEED Certification Levels. This would be accomplished by incorporating, at a minimum, the following sustainability features or other features that are equally efficient:

Energy Efficiency

- Design building shells and components, such as windows, roof systems and electrical systems to meet California Title 24 Standards for nonresidential buildings.

- Design buildings to achieve U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) features for potential certification. This includes design considerations related to the building envelope, heating, ventilation, and air conditioning (HVAC), lighting, and power systems. Additionally, architectural expressions, such as roofs and windows in the buildings would relate to conserving energy.

- Install energy efficient light-emitting diodes (LED) lighting on the site. Provide skylights for natural daylight to reduce the lighting load, therefore saving energy. Lighting would incorporate motion sensors that turn them off when not in use.

- Meet City minimum landscape requirements and provide adequate landscape shade for the site to reduce energy use.

- Install light-colored roofing materials over office area spaces and light-colored paving materials.

- For future office space, install energy efficient HVAC systems (seasonal energy efficiency ratio (SEER) 13), appliances and equipment, and control systems that are Energy Star rated.

- For future office improvement, refrigerants and HVAC equipment would be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global climate change. Ventilation and HVAC systems would be designed to meet or exceed the minimum outdoor air ventilation rates described in the American Society of Heating, Refrigeration, and Air Conditioning Engineers standards and/or per California Title 24 requirements.

- Incorporate Energy Star rated space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.

Water Conservation and Efficiency

- Surface parking lots would be landscaped in accordance with City standards to reduce heat island effect.

- Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls and sensors for landscaping according to the California Department of Water Resources Model Efficient Landscape Ordinance and Chapter 19.70 (Landscaping) of the Perris Municipal Code.

- Design buildings to be water efficient. Install water-efficient fixtures in accordance with Section 5.303 of the California Green Building Standards Code Part 11.

- Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff in accordance with City Standards.

- Provide education about water conservation and available programs and incentives to the building operators to distribute to employees.

Solid Waste Measures

- Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1 of the California Green Building Standards Code Part 11.

- Provide storage areas for recyclables and green waste and adequate recycling containers located in readily accessible areas in accordance with Section 5.410.1 of the California Green Building Standards Code Part 11.

- The property operator would provide readily available information provided by the City for employee education about reducing waste and available recycling services.

Transportation and Motor Vehicles

- Limit idling time for commercial vehicles to no more than five minutes per Title 13 of the California Code of Regulations, Section 2485.

- Provide electric vehicle (EV) infrastructure and facilitate EV charging in accordance with Section 5.106.5.3, Electric Vehicle Charging Requirements, of the California Green Building Standards Code Part 11. Accordingly, the Project would provide a minimum of 35 EV-capable parking spaces and at least 12 of these spaces would be equipped with EV charging stations at Project opening.[1]

- Signage shall be posted onsite directing truck drivers to use existing City truck routes on Harley Knox Boulevard.

- Provide Class II bike lanes on Harley Knox Boulevard, within the Project's frontage, per the City's Active Transportation Plan.

- Provide adequate bicycle parking near building entrances to promote cyclist safety, security, and convenience in compliance with Section 5.106.4 of the California Green Building Standards Code Part 11 and standard City code requirements.

Onsite Equipment and Loading Docks

- The Project owner would inform building operators of existing requirements to turn off equipment, including heavy-duty equipment, motor vehicles, and portable equipment, when not

[1] These numbers are based on the current requirements of Section 5.106.5.3.1 of the 2022 California Green Building Standards (CALGreen) Code, Title 24, Part 11. The 2025 CALGreen Code takes effect on January 1, 2026 and the Project would need to provide at least 18 spaces with EV chargers at the time of opening if its building permits are approved after 2025.

in use for more than 5 minutes. Truck idling shall not exceed 5 minutes in time. All facilities would post signs (both interior and exterior facing signs, including signs directed at all dock and delivery areas) requiring that trucks shall not be left idling for more than 5 minutes pursuant to Title 13 of the California Code of Regulations, Section 2485, which limits idle times to not more than five minutes and to report violations to California Air Resources Board, the South Coast AQMD, and the building manager.

- Service equipment (i.e., yard trucks and forklifts) used within the site shall be electric with the necessary electrical charging stations provided or powered by other alternative technology.

Construction

- Require Construction Equipment to Turn Off When Not in Use per Title 13 of the California Code of Regulations, Section 2449.

- Use regionally produced and/or manufactured building materials, where feasible, for Project construction.

- Use "green" building materials where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way.

1.5 Project Objectives

Per CEQA Guidelines Section 15124 (b), an EIR needs to include a statement of the objectives of a project which helps the City develop a reasonable range of alternatives. The objectives need to outline the general purpose of the project. The purpose of the proposed Project is to construct and operate a high-cube, warehouse building. The Project objectives as identified by the Project applicant are as follows:

- Develop and operate a logistics center on an underutilized site that leverages the existing City infrastructure and is adjacent to similar industrial logistics and distribution center uses.
- Develop and operate a logistics center on an underutilized site that capitalizes the Project site's visibility from I-215 that will attract high-quality tenants and will be competitive with other similar facilities in the region.
- Develop a strategically located logistics center in close proximity to March ARB/IPA, I-215/SR-60, and I-10, to support the distribution of goods throughout the region that limits traffic truck disruption to residential areas within the City and neighboring jurisdictions.
- Enhance regional freight efficiency by positioning the logistics center within proximity to the Ports of Los Angeles and Long Beach, enabling trucks servicing the site to achieve a minimum of two roundtrips per day.
- Design and operate a logistics center that is Silver LEED Certified and meets industry standards for logistics operations and site functionality.
- Support the City's economic growth through capital investment, job creation—including roles for highly skilled workers—and expansion of the local tax base that would further the City's near tern and long-rage fiscal goals.
- Implement the PVCCSP through development of an underutilized site with a land use allowed by the Industrial land use designation and consistent with the PVCCSP development standards and criteria relevant to the site and proposed use.

- Create local job opportunities for residents to improve the City's jobs-housing balance.
- Establish new development that would further the City's near-term and long-range fiscal goals.

1.6 Discretionary Actions and Approvals

The following approvals and permits are required from the City to implement the proposed Project:

- Certification of an EIR with the determination that the EIR has been prepared in compliance with the requirements of CEQA;

- Tentative Parcel Map (TPM) 38684: Consolidate the existing seven (7) parcels into one parcel and dedicate portions of the Project site to Harley Knox Boulevard and Indian Avenue Road right-of-way; and

- Development Plan Review (DPR) 22-00016: Develop an approximately 25.1-gross-acre site with an approximately 549,786-square-foot industrial high-cube non-refrigerated speculative warehouse distribution building per **Figure 1.0-9 – Site Plan**. In addition to the 25.1-acre site, up to 1.1 additional acres of potential offsite improvements may be necessary.

Other non-discretionary actions anticipated to be taken by the City at the staff level as part of the proposed Project include:

- Review and approval of all infrastructure plans, including street and utility improvements pursuant to the conditions of approval;

- Review all on and offsite plans, including grading and on and offsite utilities; and

- Approval of a preliminary Water Quality Management Plan (WQMP) to mitigate post-construction runoff flows.

Approvals and permits that may be required by other agencies include:

- Santa Ana Regional Water Quality Control Board - NPDES permit to ensure that construction site drainage velocities are equal to or less than the pre-construction conditions and downstream water quality is not worsened and Waste Discharge Permit for storm drain connections to the Perris Valley Storm Drain;

- South Coast Air Quality Management District – Compliance with the Indirect Source Rule (Rule 2305) for warehouse owners and operators and a permit to install and operate a diesel fueled fire water pump;

- Eastern Municipal Water District – Approval of water and sewer improvement plans;

- Other utility agencies - Permits or associated approval as necessary, for installation of new utility infrastructure or connections to existing facilities;

- Riverside County Flood Control and Water Conservation District - Encroachment permit for construction of Line A to discharge into the Perris Valley Storm Drain, Lateral B;

- California Department of Fish and Wildlife - Section 1602 Lake and Streambed Alteration Agreement for the storm drain connections to the Perris Valley Storm Drain.

1.7 Areas of Controversy and Issues to be Resolved

CEQA Guidelines Section 15123(b)(2) requires that areas of controversy known to the Lead Agency must be stated in the EIR summary. Issues of interest to the public and public agencies were identified during the 30-day public comment period of the Notice of Preparation, as well as comments received during the public scoping meeting that was held on June 18, 2025, for the proposed Project at the City of Perris.

A Notice of Preparation for the Draft EIR was distributed to the State Clearinghouse, responsible agencies, and other interested parties via digital upload, overnight mail, or delivery on May 30, 2025. A notice advising of the availability of the Notice of Preparation was also posted by the Riverside County Clerk on May 30, 2025. The objective of distributing an Notice of Preparation is to solicit public comment in order to identify and determine the full range and scope of issues of concern so that these issues might be fully examined in the Draft EIR. Comments received regarding the Notice of Preparation were used to help identify impacts that could result from implementation of the proposed Project.

The Notice of Preparation and Notice of Preparation comment letters are included in Appendices A of this Draft EIR. By the close of the 30-day public review period, six responses to the Notice of Preparation had been received which will be addressed in the Draft EIR. A summary of Notice of Preparation comments has been included in *Section 2.0 (Introduction)*.

The Notice of Preparation prepared and circulated for public review regarding the First Industrial Logistics at Harley Knox and Indian Project (Appendix A) concluded that the proposed Project would not result in potentially significant impacts to: Aestheics, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities/Service Systems, and Wildfire.

CEQA Guidelines Section 15123(b)(3) requires that a Draft EIR identify issues to be resolved; this includes the choice among alternatives and whether or how to mitigate significant impacts. The major issues to be resolved for the proposed Project include decisions by the City of Perris as to whether:

- this Draft EIR adequately describes the potential environmental impacts of the proposed Project;
- the recommended mitigation measures should be adopted or modified;
- additional mitigation measures need to be applied;
- the Project should or should not be approved as proposed; or
- the Project should be modified based on the alternatives considered in this Draft EIR.

1.8 Summary of Environmental Impacts

CEQA guidelines Section 15123(b)(1) states that an EIR must contain a brief summary of significant environmental effects associated with the Project. The following table, **Table 1.0-C – Draft EIR Impact**

Summary Matrix, summarizes the environmental impacts analyzed in the Draft EIR and identifies the proposed mitigation measure , if applicable, that would reduce those impacts. The table also includes environmental effects evaluated in the Initial Study (see Appendix A) that include mitigation measures to reduce impacts to less than significant levels.

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Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
IMPACT Category: Aesthetics (Mitigation Measures from Initial Study)		
Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area	**Applicable PVCCSP Mitigation Measures**	Less than significant.
	MM Haz 3: Any outdoor lighting installed shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane.	
	MM Haz 5: The following uses shall be prohibited: a. Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator. b. Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport. c. Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. d. Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation. **e.** All retention and water quality basins shall be designed to dewater within 48 hours of a rainfall event.	
	Additional Project-Level Mitigation Measures	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	MM AES 1: Prior to issuance of grading permits, the Project developer shall provide evidence to the City that any temporary nighttime lighting installed for security purposes shall be downward facing and hooded or shielded to prevent security light spillage outside of the staging area or direct broadcast of security light into the sky.	
IMPACT Category: Agriculture and Forestry Resources		
Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant impact
IMPACT Category: Air Quality		
Conflict with or obstructing of implementation of the applicable air quality plan	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.)	**Applicable PVCCSP Mitigation Measures** **MM Air 2**: Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested	Less than significant.

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	streets or sensitive receptors, and/or signal synchronization to improve traffic flow.	
	MM Air 3: To reduce fugitive dust emissions, the development of each individual implementing development project shall comply with SCAQMD Rule 403. The developer of each implementing project shall provide the City of Perris with the SCAQMD-approved dust control plan, or other sufficient proof of compliance with Rule 403, prior to grading permit issuance. Dust control measures shall include, but are not limited to: • requiring the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain), • keeping disturbed/loose soil moist at all times, • requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered, • installation of wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip, • posting and enforcement of traffic speed limits of 15 miles per hour or less on all unpaved potions of the project site, • suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 miles per hour, • appointment of a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM-10 generation, • sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks when sweeping streets to remove visible soil materials,	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	• replacement of ground cover in disturbed areas as quickly as possible.	
	MM Air 4: Building and grading permits shall include a restriction that limits idling of construction equipment on site to no more than five minutes.	
	MM Air 5: Electricity from power poles shall be used instead of temporary diesel or gasoline-powered generators to reduce the associated emissions. Approval will be required by the City of Perris' Building Division prior to issuance of grading permits.	
	MM Air 6: The developer of each implementing development project shall require, by contract specifications, the use of alternative fueled off-road construction equipment, the use of construction equipment that demonstrates early compliance with off-road equipment with the CARB in-use off-road diesel vehicle regulation (SCAQMD Rule 2449) and/or meets or exceeds Tier 3 standards with available CARB verified or US EPA certified technologies. Diesel equipment shall use water emulsified diesel fuel such as PuriNOx unless it is unavailable in Riverside County at the time of project construction activities. Contract specifications shall be included in project construction documents, which shall be reviewed by the City of Perris' Building Division prior to issuance of a grading permit.	
	MM Air 7: During construction, ozone precursor emissions from mobile construction equipment shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturers' specifications to the satisfaction of the City of Perris' Building Division. Equipment maintenance records and equipment design specification data sheets shall be kept on-site during construction. Compliance with this measure shall be subject to periodic inspections by the City of Perris' Building Division.	
	MM Air 8: Each individual implementing development project shall apply paints using either high volume low pressure (HVLP) spray equipment with	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.	
	MM Air 9: To reduce VOC emissions associated with architectural coating, the project designer and contractor shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g. bathroom stall dividers, metal awnings), materials that do not require painting, and require coatings and solvents with a VOC content lower than required under Rule 1113 to be utilized. The construction contractor shall be required to utilize "Super-Compliant" VOC paints, which are defined in SCAQMD's Rule 1113. Construction specifications shall be included in building specifications that assure these requirements are implemented. The specifications for each implementing development project shall be reviewed by the City of Perris' Building Division for compliance with this mitigation measure prior to issuance of a building permit for that project.	
	MM Air 11: Signage shall be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of five minutes.	
	MM Air 12: Where transport refrigeration units (TRUs) are in use, electrical hookups will be installed at all loading and unloading stalls in order to allow TRUs with electric standby capabilities to use them.	
	MM Air 13: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD's Carl Moyer Program, or other state programs that restrict operations to "clean" trucks, such as 2007 or newer model year or 2010 compliant vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year would be used at a facility with three or more dock-high doors, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP [On-road Heavy Duty Voucher Incentive Program], HVIP [Hybrid and Zero- Emission Truck and Bus Voucher Incentive Project],	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	and SOON [Surplus Off-Road Opt-in for NO_X] funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants would be required to use those funds, if awarded.	
	MM Air 14: Each implementing development project shall designate parking spaces for high- occupancy vehicles and provide larger parking spaces to accommodate vans used for ride sharing. Proof of compliance would be required prior to the issuance of occupancy permits.	
	MM Air 19: In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g., electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the Project site. These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris' Building Division) prior to conveyance of applicable streets.	
	MM Air 20: Each implementing development project shall be encouraged to implement, at a minimum, an increase in each building's energy efficiency 15 percent beyond Title 24, and reduce indoor water use by 25 percent. All reductions will be documented through a checklist to be submitted prior to issuance of building permits for the implementing development project with building plans and calculations.	
	Additional Project-Level Mitigation Measures	
	No additional Project-level mitigation is required.	
Expose sensitive receptors to substantial pollutant concentrations	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
IMPACT Category: Biological Resources (Mitigation Measures from Initial Study)		
Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service	**Applicable PVCCSP Mitigation Measures** No applicable PVCCSP mitigation measures. **Additional Project-Level Mitigation Measures** **MM BR 1:** To avoid violation of the Migratory Bird Treaty Act and the California Fish and Game Code, site preparation activities (ground disturbance, construction activities, staging equipment, and/or removal of trees and vegetation) for the Project shall be avoided, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species. If site-preparation activities are proposed during the nesting/breeding season, the Project proponent shall retain a qualified biologist to conduct a pre-activity field survey prior to the issuance of grading permits for the Project to determine if active nests of species protected by the Migratory Bird Treaty Act or the California Fish and Game Code are present in the construction zone. If active nests are not located within the Project site and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, then construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, then the Biologist shall immediately establish a conservative avoidance buffer surrounding the nest based on their best professional judgement and experience. The Biologist shall monitor the nest at the onset of project activities, and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the Biologist determines that such project activities may be causing an adverse reaction, the Biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All	Less than significant.

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	work within these buffers shall be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The on-site qualified biologist will review and verify compliance with these nesting avoidance buffers and will verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found. Upon completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to City for mitigation monitoring compliance record keeping.	
	MM BR 2: The Project proponent shall retain a qualified biologist to conduct a pre-construction survey for resident burrowing owls no more than 30 days prior to commencement of grading and construction activities at the Project site. The survey shall include the Project site and all suitable burrowing owl habitat within a 500-foot buffer. The results of the survey shall be submitted to the City of Perris Planning Division prior to obtaining a grading permit. In addition, if burrowing owls are observed during the Migratory Bird Treaty Act nesting bird survey, to be conducted within three days prior to ground disturbance or vegetation clearance, the observation shall be reported to the Wildlife Agencies. If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity will be conducted in accordance with the current Burrowing Owl Survey Instructions for the Western Riverside MSHCP. If burrowing owl are detected, the California Department of Fish and Wildlife (CDFW) and Western Riverside County Regional Conservation Authority (RCA) shall be sent written notification by the City, within three days of detection of burrowing owls. If active nests are identified during the pre-construction survey required by mitigation measure **MM BR 1**, the nests shall be avoided and the qualified biologist and Project Applicant shall coordinate with the City of Perris Planning Division to develop a Burrowing Owl Plan to be approved by the City in consultation with the CDFW, the U.S. Fish and Wildlife Service and the RCA prior to commencing Project activities. The Burrowing Owl Plan shall be prepared in accordance with guidelines in the CDFW Staff Report on Burrowing Owl (March 2012) and MSHCP. The Burrowing Owl Plan shall describe proposed avoidance, minimization, relocation, and monitoring as	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	applicable. The Burrowing Owl Plan shall include the number and location of occupied burrow sites and details on proposed buffers if avoiding the burrowing owls and/or information on the adjacent or nearby suitable habitat available to owls for relocation. If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls may also be required in the Burrowing Owl Plan. The Permittee shall implement the Burrowing Owl Plan following CDFW, Fish and Wildlife Service, and RCA review and concurrence. A final letter report shall be prepared by the qualified biologist documenting the results of the Burrowing Owl Plan. The letter shall be submitted to the CDFW and RCA prior to the start of Project activities. When the Project biologist determines that burrowing owls are no longer occupying the Project site per the criteria in the Burrowing Owl Plan, Project activities may begin. If burrowing owls occupy the Project site after Project activities have started, then construction activities shall be halted immediately. The Project proponent shall notify the City and the City shall notify the CDFW, the Fish and Wildlife Service, and the RCA within 48 hours of detection. A Burrowing Owl Plan, as detailed above, shall be implemented.	
Interfere substantially with the movement of any native resident or migratory fish or wildlife species or establish native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites	**Applicable PVCCSP Mitigation Measures**	Less than significant.
	No applicable PVCCSP mitigation measures.	
	Additional Project-Level Mitigation Measures	
	MM BR 1, above.	
Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan	**Applicable PVCCSP Mitigation Measures**	Less than significant.
	No applicable PVCCSP mitigation measures.	
	Additional Project-Level Mitigation Measures	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	MM BR 1 and **MM BR 2**, above.	
IMPACT Category: Cultural Resources(Mitigation Measures from Initial Study)		
Cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5	**Applicable PVCCSP Mitigation Measures**	Less than significant.
	No applicable PVCCSP mitigation measures.	
	Additional Project-Level Mitigation Measures	
	MM CR-1: Prior to the issuance of grading permits, the Project proponent/developer shall retain a professional archaeologist meeting the Secretary of the Interior's Professional Standards for Archaeology (U.S. Department of Interior, 2012; Registered Professional Archaeologist preferred). The primary task of the consulting archaeologist shall be to monitor the initial ground-disturbing activities at both the Project site and any off-site project-related improvement areas for the identification of any previously unknown archaeological and/or cultural resources. Selection of the archaeologist shall be subject to the approval of the City of Perris Director of Development Services and no ground-disturbing activities shall occur at the Project site or within the off-site Project improvement areas until the archaeologist has been approved by the City. The archaeologist shall be responsible for monitoring ground-disturbing activities, maintaining daily field notes and a photographic record, and for reporting all finds to the developer and the City of Perris in a timely manner. The archaeologist shall be prepared and equipped to record and salvage cultural resources that may be unearthed during ground-disturbing activities and shall be empowered to temporarily halt or divert ground-disturbing equipment to allow time for the recording and removal of the resources. In the event that archaeological resources are discovered at the Project site or within the off-site project improvement areas, the handling of the discovered resource(s) will differ, depending on the nature of the find. Consistent with California Public Resources Code Section 21083.2(b) and Assembly Bill 52 (Chapter 532, Statutes of 2014), avoidance shall be the	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	preferred method of preservation for Native American/tribal cultural/archaeological resources. However, it is understood that all artifacts, with the exception of human remains and related grave goods or sacred/ceremonial/religious objects, belong to the property owner. The property owner will commit to the relinquishing and curation of all artifacts identified as being of Native American origin. All artifacts, Native American or otherwise, discovered during the monitoring program shall be recorded and inventoried by the consulting archaeologist. If any artifacts of Native American origin are discovered, all activities in the immediate vicinity of the find (within a 50-foot radius) shall stop and the project proponent and project archaeologist shall notify the City of Perris Planning Division and the Soboba Band of Luiseño Indians and the Pechanga Band of Indians. A designated Native American representative from either the Soboba Band of Luiseño Indians or the Pechanga Band of Indians shall be retained to assist the project archaeologist in the significance determination of the Native American as deemed possible. The designated Native American tribal representative shall be given ample time to examine the find. The significance of Native American resources shall be evaluated in accordance with the provisions of CEQA and shall consider the religious beliefs, customs, and practices of the Luiseño tribe. If the find is determined to be of sacred or religious value, the Native American tribal representative will work with the City and consulting archaeologist to protect the resource in accordance with tribal requirements. All analysis shall be undertaking in a manner that avoids destruction or other adverse impacts. In the event that human remains are discovered at the Project site or within the off-site project improvement areas, mitigation measure **MM CR-2** shall immediately apply and all items found in association with Native American human remains shall be considered grave goods or sacred in origin and subject to special handling. To the extent feasible, Native American artifacts shall be relocated/reburied at the Project site subject to a fully executed relocation/reburial agreement with the assisting Native American tribe. This shall include, but not be limited to, an agreement that artifacts will be reburied onsite and in an area of permanent protection, and that reburial	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	shall not occur until all cataloging and basic recordation have been completed by the consulting archaeologist. Native American artifacts that cannot be avoided or relocated at the Project site shall be prepared for curation at an accredited curation facility in Riverside County that meets federal standards (per 36 CFR Part 79) and available to archaeologists/researchers for further study. The Project archaeologist shall deliver the Native American artifacts, including title, to the identified curation facility within a reasonable amount of time, along with applicable fees for permanent curation. Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. Subsequent to analysis and reporting, these artifacts will be subjected to curation, as deemed appropriate, or returned to the property owner. Once grading activities have ceased and/or the archaeologist, in consultation with the designated Luiseño representative, determines that monitoring is no longer warranted, monitoring activities can be discontinued following notification to the City of Perris Planning Division. A report of findings, including an itemized inventory of artifacts, shall be prepared upon completion of the tasks outlined above. The report shall include all data outlined by the Office of Historic Preservation guidelines, including a conclusion of the significance of all recovered, relocated, and reburied artifacts. A copy of the report shall also be filed with the City of Perris Planning Division, the South Coastal Information Center, and the Native American tribe(s) involved with the project.	
Disturb any human remains, including those interred outside of dedicated cemeteries	**Applicable PVCCSP Mitigation Measures**	Less than significant.
	No applicable PVCCSP mitigation measures.	
	Additional Project-Level Mitigation Measures	
	MM CR 2: In the event that human remains (or remains that may be human) are discovered at the Project site or within the off-site Project	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	improvement areas during ground-disturbing activities, the construction contractors, Project archaeologist, and/or designated Native American tribal representative shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Perris Planning Division immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b). If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the "Most Likely Descendent" (MLD). Despite the affiliation with any Native American tribal representative(s) at the site, the NAHC's identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of Native American human remains and may recommend to the Project proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave goods. The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains will be determined in consultation between the Project proponent and the MLD. In the event that there is disagreement regarding the disposition of the remains, State law will apply and the median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98l and 5097.94(k)). The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The locations will be documented by the consulting archaeologist in conjunction with the various stakeholders and a report of findings will be filed with the South Coastal Information Center.	
IMPACT Category: Energy		
Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources,	**Applicable PVCCSP Mitigation Measures** **MM Air 4, MM Air 11, MM Air 12, MM Air 14, MM Air 19** and **MM Air 20** above	Less than significant.

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
during project construction or operation	**MM Air 18:** Prior to the approval of each implementing development project, the Riverside Transit Agency (RTA) shall be contacted to determine if the RTA has plans for the future provision of bus routing within any street that is adjacent to the implementing development project that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that will serve the implementing development project, road improvements adjacent to the Project site shall be designed to accommodate future bus turnouts at locations established through consultation with the RTA. RTA shall be responsible for the construction and maintenance of the bus stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalks and curb and gutter at bus stops and the use of ADA-compliant paths to the major building entrances in the Project.	
	Additional Project-Level Mitigation Measures	
	No additional Project-level mitigation is required.	
Conflict with or obstruct a state or local plan for renewable energy or energy efficiency	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
IMPACT Category: Geology and Soils (Mitigation Measures from Initial Study)		
Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	**Applicable PVCCSP Mitigation Measures**	Less than significant.
	No applicable PVCCSP mitigation measures.	
	Additional Project-Level Mitigation Measures	
	MM GEO 1: Prior to the issuance of grading permits, the Project proponent/developer shall submit to and receive approval from the City, a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP). The PRIMMP shall include the provision of a qualified	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	professional paleontologist (or his or her trained paleontological representative) to be on-site fulltime for any Project-related subsurface excavation. Selection of the paleontologist shall be subject to the approval of the City of Perris Planning Manager and no excavation activities shall occur at the Project site or within the off-site project improvement areas until the paleontologist has been approved by the City. Monitoring shall be restricted to undisturbed subsurface areas of older quaternary alluvium. The approved paleontologist shall be prepared to quickly salvage fossils as they are unearthed to avoid construction delays. The paleontologist shall also remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontologist shall have the authority to temporarily halt or divert grading equipment to a radius of 50 feet to allow for removal of abundant or large specimens. Collected samples of sediments shall be washed to recover small invertebrate and vertebrate fossils. Recovered specimens shall be prepared so that they can be identified and permanently preserved. Specimens shall be identified and curated and placed into an accredited repository (such as the Western Science Center or the Riverside Metropolitan Museum) with permanent curation and retrievable storage. A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered specimens. The report and inventory, when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontological resources.	
IMPACT Category: Greenhouse Gas Emissions		
Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment	**Applicable PVCCSP Mitigation Measures** **MM Air 2, MM Air 4, MM Air 5, MM Air 6, MM Air 7, MM Air 11, MM Air 12, MM Air 13, MM Air 14, MM Air 18, MM Air 19,** and **MM Air 20** above	Less than significant.

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	Additional Project-Level Mitigation Measures	
	No additional Project-level mitigation	
Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
IMPACT Category: Hazards/Hazardous Materials (Mitigation Measures from Initial Study)		
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 or people residing or working in the project area?	**Applicable PVCCSP Mitigation Measures**	Less than significant.
	MM Haz 2: Prior to the recordation of a final map, issuance of a building permit, or conveyance to an entity exempt from the Subdivision Map Act, whichever occurs first, the landowner shall convey an avigation easement to the March ARB/March Inland Port Airport Authority.	
	MM Haz 3: Any outdoor lighting installed shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane.	
	MM Haz 4: The following notice shall be provided to all potential purchasers and tenants: "This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example, noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you. Business & Profession Code 11010 13(A)."	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	MM Haz 5: The following uses shall be prohibited: a. Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator. b. Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport. c. Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. d. Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation. e. All retention and water quality basins shall be designed to dewater within 48 hours of a rainfall event.	
	MM Haz 6: A minimum of 45 days prior to submittal of an application for a building permit for an implementing development project, the implementing development project applicant shall consult with the City of Perris Planning Department in order to determine whether any implementing project-related vertical structures or construction equipment would encroach into the 100-to-1 imaginary surface surrounding March ARB. If it is determined that there would be an encroachment into the 100-to-1 imaginary surface, the implementing development project applicant shall file a FAA Form 7460-1, Notice of Proposed Construction or Alteration. If FAA determines that the implementing development project would potentially be an obstruction unless reduced to a specified height, the implementing development project applicant and the Perris Planning Division would work with FAA to resolve any adverse effects on aeronautical operations.	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	Additional Project-Level Mitigation Measures	
	MM AES 1, above.	
IMPACT Category: Hydrology and Water Quality (Mitigation Measures from Initial Study)		
Violate any water quality standards or waste discharge requirements.	**Applicable PVCCSP Mitigation Measures**	Less than significant.
	MM Haz 5 above.	
	Additional Project-Level Mitigation Measures	
	No additional Project-level mitigation	
IMPACT Category: Land Use		
Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
IMPACT Category: Noise		
Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in local general plan or noise ordinance, or applicable standards of other agencies	**Applicable PVCCSP Mitigation Measures**	Less than significant.
	MM Noise 1: During all project site excavation and grading on-site, construction contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturer's standards. The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the project site.	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	Additional Project-Level Mitigation Measures	
	MM NOI 1: Construction equipment used during nighttime hours, as defined in Perris Municipal Code Section 7.34.060, shall be equipped with engine mufflers that reduce the equipment noise by 15 dBA or greater to meet the maximum noise construction levels of 80 dBA in residential zones.	
Generation of excessive ground-borne vibration or ground-borne noise levels	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
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	**Applicable PVCCSP Mitigation Measures**	Less than significant.
	No applicable PVCCSP mitigation measures.	
	Additional Project-Level Mitigation Measures	
	MM NOI 2: Prior to the issuance of a building permit, the Project applicant or contractor shall provide evidence to the City of Perris that an acoustical analysis was conducted by a noise specialist to confirm that the noise insulation proposed in the final building design is sufficient to achieve the City's and ALUCP's noise standards of 45 CNEL for interior office areas. Interior noise attenuation measures may include construction techniques and noise dampening materials such as, but not limited to, specialized window glazing in the office areas of the proposed building.	
IMPACT Category: Transportation		
Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit,	**Applicable PVCCSP Mitigation Measures**	Less than significant.
	MM Trans 1: Future implementing development projects shall construct on-site roadway improvements pursuant to the general alignments and	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
roadway, bicycle and pedestrian facilities	right-of-way sections set forth in the PVCC Circulation Plan, except where said improvements have previously been constructed.	
	MM Trans 2: Sight distance at the project entrance roadway of each implementing development project shall be reviewed with respect to standard City of Perris sight distance standards at the time of preparation of final grading, landscape and street improvement plans.	
	MM Trans 3: Each implementing development project shall participate in the phased construction of off-site traffic signals through payment of that project's fair share of traffic signal mitigation fees and the cost of other off-site improvements through payment of fair share mitigation fees which include TUMF (Transportation Uniform Mitigation Fee), DIF (Development Impact Fee) and the NPRBBD (North Perris Road and Bridge Benefit District). The fees shall be collected and utilized as needed by the City of Perris to construct the improvements necessary to maintain the required LOS and build or improve roads to their build-out level.	
	MM Trans 4: Prior to the approval of individual implementing development projects, the Riverside Transit Agency (RTA) shall be contacted to determine if the RTA has plans for the future provision of bus routing in the project area that would require bus stops at the project access points. If the RTA has future plans for the establishment of a bus route that would serve the project area, road improvements adjacent to the project site shall be designed to accommodate future bus turnouts at locations established through consultation with the RTA. RTA shall be responsible for the construction and maintenance of the bus stop facilities. The area set aside for bus turnouts shall conform to RTA design standards, including the design of the contact between sidewalk and curb and gutter at bus stops and the use of ADA-compliant paths to the major building entrances in the project.	
	MM Trans 5: Bike racks shall be installed in all parking lots in compliance with City of Perris standards.	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	MM Trans 7: Implementing project-level traffic impact studies shall be required for all subsequent implementing development proposals within the boundaries of the PVCC as approved by the City of Perris Engineering Department. These subsequent traffic studies shall identify specific project impacts and needed roadway improvements to be constructed in conjunction with each implementing development project. All intersection spacing for individual tracts or maps shall conform to the minimum City intersection spacing standards. All turn pocket lengths shall conform at least to the minimum City turn pocket length standards. If any of the proposed improvements are found to be infeasible, the implementing development project applicant would be required to provide alternative feasible improvements to achieve levels of service satisfactory to the City.	
	MM Trans 8: Proposed mitigation measures resulting from project-level traffic impact studies shall be coordinated with the NPRBBD to ensure that they are in conformance with the ultimate improvements planned by the NPRBBD. The applicant shall be eligible to receive proportional credits against the NPRBBD for construction of project-level mitigation that is included in the NPRBBD.	
	Additional Project-Level Mitigation Measures	
	No additional Project-level mitigation is required.	
Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)	No applicable PVCCSP mitigation measures. No additional Project-level mitigation is required.	Less than significant.
Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)	**Applicable PVCCSP Mitigation Measures**	Less than significant.
	MM Trans 1 and MM Trans 2, above.	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
	Additional Project-Level Mitigation Measures	
	No additional Project-level mitigation is required.	
IMPACT Category: Tribal Cultural Resources		
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 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)	**Applicable PVCCSP Mitigation Measures**	Less than significant.
	No applicable PVCCSP mitigation measures.	
	Additional Project-Level Mitigation Measures	
	MM CR 1, MM CR 2 above.	
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 A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in	**Applicable PVCCSP Mitigation Measures**	Less than significant.
	No applicable PVCCSP mitigation measures.	
	Additional Project-Level Mitigation Measures	
	MM CR 1, MM CR 2 above.	

Table 1.0-C — Draft EIR Impact Summary Matrix

Impact	Applicable PVCCSP Mitigation Measures and Additional Project-Level Mitigation Measures	Impact After Mitigation
subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision(c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe		

1.9 Alternatives to the Proposed Project

One of the most important aspects of the environmental review process is the identification and assessment of reasonable alternatives that have the potential for avoiding or minimizing the significant impacts of a proposed project. The State CEQA Guidelines (Section 15126(d)) emphasizes the selection of a reasonable range of technically feasible alternatives and adequate assessment of these alternatives to allow for a comparative analysis and consideration by decision-makers. The State CEQA Guidelines state that the discussion of alternatives shall focus on alternatives capable of eliminating or reducing significant adverse environmental effects of a proposed project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.

The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. The range of alternatives required in an EIR is governed by a "rule of reason," which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. Of the alternatives considered, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. Pursuant to CEQA, "feasible" has been defined as "...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."

1.9.1 Alternatives Summary

The Project objectives allow for the analysis of reasonable alternatives to the proposed Project. A range of reasonable alternatives, that would feasibly attain most of the basic Project objectives, while avoiding or substantially lessening the significant effects of the Project, must be analyzed per CEQA Guidelines Section 15126.6. Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. The rationale for selecting the alternatives to be evaluated and a discussion of the "no project" alternative are also required, pursuant to Section 15126.6. This Draft EIR evaluates: Alternative 1) Smaller Building Project, and Alternative 2) Two Smaller Buildings Project.

Table 1.0-D – Comparison of Alternative Matrix, gives a summary of all Project alternatives considered in detail in the Draft EIR and identifies the areas of potential environmental effects per CEQA and ranks each alternative as less, same, or greater than the proposed Project with respect to each area.

Table 1.0-D – Comparison of Alternative Matrix

Environmental Issue	Proposed Project	Alternative 1 Smaller Building	Alternative 2 Two Smaller Buildings
Agricultural Resources	LTS	Similar	Similar
Air Quality	LTSM	Reduced	Reduced
Energy	LTSM	Reduced	Reduced
Greenhouse Gas (GHG) Emissions	LTSM	Reduced	Reduced
Land Use and Planning	LTS	Similar	Similar
Noise	LTSM	Similar	Similar
Transportation	LTS	Similar	Similar
Environmentally Superior		Yes, but to a lesser degree	Yes, but to a lesser degree
Meets Project Objectives		Yes, but to a lesser degree	Yes, but to a lesser degree

LTS = Less than Significant Impact
LTSM = Less than Significant Impact with Mitigation. Mitigation includes Project-specific and/or PVCCSP EIR measures.
SU = Significant and Unavoidable Impact

2.0 Introduction

This Draft Environmental Impact Report (Draft EIR) has been prepared pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000, et seq.) to assess the potential environmental effects of the proposed First Industrial Logistics at Harley Knox and Indian Project (Project) within the Perris Valley Commerce Center (PVCC) area of the City of Perris (City).

The intentions of CEQA are to: (1) inform governmental decision-makers and the public about the potentially significant environmental effects of proposed activities; (2) identify the ways that environmental damage can be avoided or substantially reduced; (3) prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and (4) disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose, if significant environmental effects are involved (CEQA Guidelines Section 15002).

The City of Perris is the Lead Agency under CEQA for this Project pursuant to Sections 15051 and 15367 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines) (California Code of Regulations, Sections 15,000, et seq.) and will use this document to objectively review and assess the proposed Project prior to approving or denying the Project. As discussed further in *Section 2.3*, this Draft EIR is tiered from the *City of Perris General Plan 2030 Environmental Impact Report* as well as the *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report (State Clearinghouse No. 2009081086)* (PVCCSP EIR), which are hereby incorporated herein by reference.

2.1 Background

The approximately 25.10-acre gross acre Project site and an approximate 1.10-acre off-site improvement area are located at the northwest corner of Harley Knox Boulevard and Indian Avenue, in the City of Perris in Riverside County and is within the PVCC area. The Perris Valley Commerce Center Specific Plan (PVCCSP) was adopted by the City of Perris on January 12, 2012 (Ordinance No. 1284). The environmental impacts resulting from implementation of allowed development under the PVCCSP have been evaluated in the PVCCSP EIR, which was also certified by the City on January 12, 2012. The PVCCSP EIR is a program EIR, and project-specific evaluations in later-tier environmental documents for individual development projects within the PVCC area were anticipated. This Draft EIR is such a document.

The Project site has a General Plan Land Use Designation of PVCC SP – Perris Valley Commerce Center Specific Plan. The Perris Valley Commerce Center Specific Plan (PVCCSP) establishes the zoning for the properties within the PVCC area. The PVCCSP Land Use Plan Designation for the Project site is General Industrial (GI). The Project site is surrounded by land designated in the PVCCSP as GI (to the west and south) and Light Industrial (LI) (to the east). To the north of the Project site, is the Perris Valley Channel lateral B , followed by the City of Moreno Valley.

The Project site is located within the northern portion of the PVCC area, which encompasses more than five square miles and over 3,500 acres that is located in the northern end of the City. The PVCC area is relatively flat, sloping in a southeasterly direction with elevations ranging from 1,430 to 1,500 feet above mean sea level. The Project site is located on land designated by the California Department of

Conservation in its Farmland Mapping and Monitoring Program as “Prime Farmland” and “Urban and Built-Up Land.”

The Project site and off-site improvement area are located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Mead Valley Area Plan. The Project site is not located within an MSHCP Criteria Cell, Cell Group, or Linkage Area. In addition to the previous development, the Project site contains disturbed vegetation that receives frequent weed abatement (i.e., chain flail mowing, disking.

2.2 Purpose and Scope

The purpose of this Draft EIR is to evaluate potential environmental impacts resulting from the implementation of the proposed First Industrial Logistics at Harley Knox and Indian Project. The City of Perris is the Lead Agency under CEQA and is responsible for the preparation of this Draft EIR. This Draft EIR is an informational document intended for use by the City, decision-makers, and members of the general public in evaluating the potential environmental effects associated with the proposed Project. This Draft EIR has been prepared pursuant to the CEQA Guidelines, and the rules, regulations, and procedures for implementing CEQA as implemented by the City.

2.3 Compliance with CEQA

2.3.1 Format

Section 1 of this document covers the summary requirements of CEQA as required by Section 15123 of the CEQA Guidelines. *Section 2* introduces the document, provides background regarding the Project, and discusses this Draft EIR’s compliance with CEQA. *Section 2* also provides a summary of the written comments received in response to the Notice of Preparation of a Draft EIR and the comments received at the Draft EIR scoping meeting held for the proposed Project. *Section 3* satisfies the project description requirements of CEQA by discussing the project location, the project objectives, a general description of the project’s environmental setting, and a statement of document purpose and intended use. *Section 4* identifies the environmental effects found not to be significant during preparation of the Notice of Preparation and Draft EIR preparation process.

Environmental issues identified in the Notice of Preparation prepared for the proposed Project are discussed in *Section 5* through *Section 8* of this Draft EIR, which has been formatted to address the following general topics: *Environmental Impact Analysis*, *Other CEQA Topics*, *Cumulative Impact Analysis*, and *Alternatives*. Under each issue, an analysis is performed to determine the amount and degree of impact that is associated with the Project. For all identified significant environmental impacts, mitigation measures, where feasible, are recommended in order to reduce the potentially significant impact to a less than significant level or to the maximum extent feasible.

The analysis of impacts and identification of mitigation measures is derived from technical reports which are included as technical appendices to this Draft EIR and from other informational resources as listed in *Section 9 References*.

2.3.2 CEQA Procedures

The EIR process typically consists of three parts – the Notice of Preparation, Draft EIR, and Final EIR. Pursuant to Section 15063 of the CEQA Guidelines, a Notice of Preparation for this Draft EIR with a description of potential adverse impacts was distributed to the Governor's Office of land Use and Climate Innovation State Clearinghouse, responsible agencies, and other interested parties via digital upload, overnight mail, or delivery on May 30, 2025. A notice advising of the availability of the Notice of Preparation was also posted by the Riverside County Clerk on May 30, 2025. Pursuant to CEQA Guidelines Section 15082, recipients of the Notice of Preparation were requested to provide responses within 30 days after their receipt of the Notice of Preparation. Copies of the Notice of Preparation and the Notice of Preparation distribution list are provided in Appendix A.1 to this Draft EIR. Copies of comment letters regarding the Notice of Preparation, received by the City, are included in Appendix A.2. The comment letters are summarized in Section 2.5 – Notice of Preparation Comment Letters. A Draft EIR scoping meeting was held on June 18, 2025 before the City of Perris Planning Commission pursuant to the requirements of CEQA Guidelines Section 15082(c)(1).

This document provides for this Draft EIR stage of the EIR process. Pursuant to Public Resources Code Section 21091(a), this Draft EIR will be published for a 45-day public review and comment period. At the conclusion of the 45-day public review and comment period, the City will prepare the Final EIR, which will include responding to any written comments received on this Draft EIR during the 45-day public review period. The Final EIR will be a separate document.

As the "Lead Agency" for the purposes of CEQA compliance, the City of Perris has the principal responsibility for processing and approving the Project. As set forth in CEQA Guidelines Section 15021, as "Lead Agency", the City of Perris also has the duty to avoid or minimize significant environmental damage where feasible. Furthermore, CEQA Guidelines Section 15021(d) states that, "CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian." Other public agencies (i.e., Responsible and Trustee Agencies) that may use this EIR in their decision-making or permit processing, will consider the information in this EIR along with other information that may be presented during the CEQA process. In accordance with CEQA, the public agencies will be required to make findings for each environmental impact of the Project that cannot be mitigated to a less than significant level. If the Lead Agency determines the benefits of the proposed Project outweigh unavoidable significant environmental effects, the agency will be required to adopt a Statement of Overriding Considerations stating the reasons supporting their action, notwithstanding the Project's significant environmental effects.

2.3.3 Breadth of Environmental Analysis

Pursuant to the provisions of CEQA Guidelines Section 15152, the environmental analysis contained within this Draft EIR shall consist of effects which were not examined as significant effects on the environment in the City of Perris General Plan EIR or the PVCCSP EIR; or which are susceptible to substantial reduction or avoidance by the choice of specific revisions in the Project, by the imposition of conditions, or other means. As appropriate, the general discussions contained within the City of Perris General Plan EIR and the PVCCSP EIR will be incorporated by reference and summarized within this Draft EIR. (CEQA Guidelines Sections 15150 and 15152).

2.4 Effects Found Not to be Significant during Preparation of this Initial Study and Notice of Preparation

CEQA provides that an EIR shall focus on the potentially significant effects on the environment, discussing the effects with emphasis in proportion to their severity and probability of occurrence. Effects dismissed in an Initial Study as clearly insignificant and unlikely to occur need not be discussed further in the EIR unless information inconsistent with the findings in the Notice of Preparation is subsequently received.

Public Resources Code Section 21100(c) states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.

The Initial Study prepared and circulated for public review regarding Project (Appendix A.1) concluded that the proposed Project would not result in potentially significant impacts related to: Aesthetics , Agriculture and Forestry Resources, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire (see *Section 4.0 – Environmental Effects Found Not to be Significant*).

2.5 Notice of Preparation Comment Letters

The public review period for the Notice of Preparation began May 30, 2025, and ended June 30, 2025. The following is a list of all parties from which written comments were received and a brief summary of the issues raised. None of the comments received had the effect of changing the issue areas that the Notice of Preparation had identified to be discussed in this Draft EIR. These letters can be found in Appendix A.2.

Table 2.0-A—Written Comments Received During the Notice of Preparation Comment Period

Commenter / Date of Letter	Summary of Comment Letter	Location in Draft EIR (or IS) in which Comment Letter is Addressed
Native American Heritage Commission (NAHC) May 30, 2025	This comment letter identifies and outlines CEQA guidelines and compliance regarding cultural resources. The NAHC recommends consultation with California Native American tribes and a cultural resources assessment.	▪ Initial Study, Section 6.5 – Cultural Resources ▪ Initial Study, Section 6.18 – Tribal Cultural Resources
Riverside County Fire Department Fire Planning Division June 16,-2025	This letter concurs with the Initial Study determination related to fire and reiterates that with the Project contribution to the City's Development Impact Fees (DIF), potential fire impacts would be addressed.	▪ Initial Study, Section 5.19 – Utilities and Service Systems ▪ Initial Study, Section 6.20 – Wildfire
Riverside County Flood Control and	The letter indicates that the proposed Project is located within the limits of	▪ Initial Study, Section 6.10 – Hydrology and Water Quality

Table 2.0-A—Written Comments Received During the Notice of Preparation Comment Period

Commenter / Date of Letter	Summary of Comment Letter	Location in Draft EIR (or IS) in which Comment Letter is Addressed
Water Conservation District June 10, 2025	Perris Valley Are Drainage Plan for which drainage fees have been adopted for which the proposed Project would be subject to if additional impervious surface areas are created. This letter further indicates an encroachment permit is required for construction related activities occurring within the District's right of way namely within the Perris Valley Channel Lateral B and if a proposed storm drain connection exceeds the hydraulic performance of the existing drainage facilities, mitigation will be required. The District's previous comments dated July 21, 2022 are still valid.	▪ Initial Study, *Section 5.19 – Utilities and Service Systems*
California Department of Conservation (DOC) June 19, 2025	This comment letter outlines concerns about farmland conversion resulting from direct and indirect implementation of the proposed Project, impacts to current and future agricultural operations in the vicinity such as land use conflicts, increases in land values and taxes, and loss of agricultural support infrastructure, cumulative impacts on agricultural land. The DOC also proposes mitigation measures be implemented for impacted agricultural lands within the proposed Project area.	▪ Draft EIR, *Section 5.1 – Agriculture Resources*
South Coast Air Quality Management District (AQMD) June 18,-2025	This comment letter established South Coast AQMD as a Responsible Agency and requests copies of this Draft EIR and all appendices, including modeling file for review. The South Coast AQMD outlined recommended methodology and guidance documents to be used when preparing the air quality and greenhouse gas analyses, including the evaluation of potential health risk impacts. Mitigation measures for operational air quality impacts from mobile sources, other sources and design considerations to reduce impacts are provided.	▪ Draft EIR, *Section 5.2 – Air Quality* ▪ Draft EIR, *Section 5.3 – Energy* ▪ Draft EIR, *Section 5.4 – Greenhouse Gas Emissions*

Table 2.0-A—Written Comments Received During the Notice of Preparation Comment Period

Commenter / Date of Letter	Summary of Comment Letter	Location in Draft EIR (or IS) in which Comment Letter is Addressed
City of Riverside June 30, 2025	The City requested the traffic analysis scope and study. The City indicated that per their Municipal Code, Section 10.56.050, 3-axle commercial vehicles are prohibited within their City boundary. The City requests that the traffic study and this Draft EIR be updated for consistency with their Municipal Code.	▪ Draft *EIR Section 5.7 – Transportation*

2.6 Comments Received at the Draft EIR Scoping Meeting

A Draft EIR public scoping meeting was held June 18, 2025 with the Perris Planning Commission. In addition to the Planning Commission, one member of the public provided comments. Comments received from the Planning Commission and the public are included in the following table.

Table 2.0-B—Verbal Comments Received During Draft EIR Scoping Meeting.

Topic	Summary of Comment	Location in Draft EIR/ Initial Study in which Comment is Addressed
Air Quality	• Concern was expressed about potential air pollution impacts	• Draft EIR, *Section 5.2 – Air Quality* • Draft EIR, *Section 5.7 – Greenhouse Gas Emissions*
Energy	• Concern was expressed about the potential Impact of energy on the community • Concern was expressed about the potential impacts to the grid • Solar panels, electric vehicle charging should be considered	• Draft EIR, *Section 5.5 – Energy* • Draft EIR, *Section 5.7 – Greenhouse Gas Emissions*
Geology and soils	• Concern was expressed about potential impacts to soils based on prior use	• Initial Study, *Section 6.9 – Geology and Soils*
Greenhouse Gas Emissions	• Concern was expressed about potential greenhouse gas impacts	• Draft EIR, *Section 5.7 – Greenhouse Gas Emissions*
Hazards and Hazardous Materials	• Concern was expressed about potential contamination of water due to previous use	• Initial Study, *Section 6.9 – Hazards/Hazardous Materials*

Table 2.0-B—Verbal Comments Received During Draft EIR Scoping Meeting.

Topic	Summary of Comment	Location in Draft EIR/ Initial Study in which Comment is Addressed
Hydrology/Water Quality	• Concern was expressed about the potential for flooding • Concerns were expressed about water quality	• Initial Study, *Section 6.10 – Hydrology/Water Quality* • Initial Study, *Section 6.19 – Utilities and Service System*
Land Use	• Concern was expressed regarding environmental justice for residents in the Project area	• Draft EIR, *Section 5.5 – Land Use*
Noise	• Concern was expressed about noise impacts	• Draft EIR*, Section 5.6 – Noise*
Transportation	• Concern was expressed about interchange impacts • Concern was expressed about cumulative transportation impacts • Concern was expressed about potential increase in VMT • Concern was expressed about congestion and accidents	• Initial Study, *Section 6.9 – Hazards/Hazardous Materials* • Draft EIR, *Section 5.7 – Transportation* • Draft EIR, *Section 7.0 – Cumulative Impacts*
Alternatives	• Include smaller or two smaller building alternatives	• Draft EIR*, Section 5.5 – Land Use Section*
Cumulative Impacts	• Air quality, greenhouse gas, traffic, and noise to be analyzed based on the most current PVCCSP. Include the data sources used for analysis	• Draft EIR, *Section 7.0 – Cumulative Impacts*

Notes: [a] Comments may also be addressed in other sections of this Draft EIR.

2.7 Potentially Significant Environmental Effects

CEQA Guidelines Sections 15126, 15126.2 and 15126.4 require consideration and discussion of significant environmental effects and mitigation measures proposed to minimize significant effects. All phases of a project must be considered when evaluating its impact on the environment: planning, land acquisition, development, and operation (CEQA Guidelines Section 15126), and an EIR shall identify and focus on the significant environmental effects of the proposed project (CEQA Guidelines Section 15126.2).

The Initial Study determined that the proposed Project may have potentially significant effects on the environment and, therefore, specific issues are discussed further in *Section 5 – Environmental Analysis* of this Draft EIR. Impacts related to the following issues were found to be potentially significant in the Notice of Preparation: Agricultural Resources, Air Quality, Energy, Greenhouse Gas Emissions, Land Use/Planning, Noise, and Transportation. Where applicable, mitigation measures are recommended to reduce significant effects.

Based on the analysis presented in this Draft EIR, no significant unavoidable impacts associated with the implementation of the proposed Project would occur.

Please see the following referenced sections of this Draft EIR for more detailed discussion of each issue area:

- Agriculture Resources (Section 5.1)
- Air Quality (Section 5.2)
- Energy (Section 5.3)
- Greenhouse Gas Emissions (Section 5.4)
- Land Use and Planning (Section 5.5)
- Noise (Section 5.6)
- Transportation (Section 5.7)

2.8 Uses of this Draft EIR

As the Lead Agency, the City of Perris has assumed responsibility for preparing this Draft EIR. The decision to implement the Project is within the purview of the City of Perris. The City decision makers will use the information included in this Draft EIR to consider potential impacts to the physical environment associated with implementation of the proposed Project when making its decision regarding the Project.

This Draft EIR will be made available for review to the public and public agencies for 45 days to allow for the preparation of comments regarding the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the Project might be avoided or mitigated (CEQA Guidelines Section 15204).

The City will use this EIR and supporting documentation for implementation of the proposed Project through the approval of land use proposals. Regulatory agencies will use this EIR and supporting documentation in its decision to issue permits related to development of the subject property.

3.0 Project Description

This Draft Environmental Report (Draft EIR) has been prepared to analyze the potential environmental effects of the construction and operation of a proposed high-cube, non-refrigerated warehouse building located at the northwest corner of Harley Knox Boulevard and Indian Avenue, and all associated on- and off-site supporting improvements, which are herein collectively referred to as the First Industrial Logistics at Harley Knox and Indian Project (Project or proposed Project). Discretionary actions to be considered by the City of Perris associated with the proposed Project includes a Tentative Parcel Map (TPM 38684) and a Development Plan Review (DPR 22-00016). The Project Description serves as a basis for analyzing the Project's potential impacts on the existing physical environment.

3.1 Project Location

The Project site encompasses approximately 25.10 gross acres of a vacant unimproved land. The Project site is located at the northwest corner of Harley Knox Boulevard and Indian Avenue, within the City of Perris (City), Riverside County, California. As shown on **Figure 3.0-1 – Regional Map** and **Figure 3.0-2 – Aerial Map,** the proposed Project site consists of Assessor's Parcel Numbers (APNs) 302-020-013, 302-020-028, 302-020-038, 302-020-032, 302-020-040, 302-020-043, and 302-020-048. The Project site is located within Section 7, Township 4 South, Range 3 West, San Bernardino Base and Meridian, on the Perris, California USGS 7.5 Quadrangle Map (Perris Quadrangle) as shown on **Figure 3.0-3 – USGS Topographic Map.** The proposed Project also includes a 1.10-acre off-site improvement area for improvements in Harley Knox Boulevard and Indian Avenue, and a drainage connection to the Riverside County Flood Control and Water Conservation District, Line B, located to the north of the Project site, as shown on **Figure 3.0-2.**

As shown in Exhibit LU 1: Planning Areas, of the City of Perris General Plan Land Use Element, the City of Perris is divided into 10 planning areas to provide more detailed land use and policy direction regarding local issues (e.g., land use circulation and open space). The planning areas are defined by similarities and opportunities in land uses, development patterns, and future developments. The Project site lies within Planning Area 1: North Industrial. This area is generally made up of "industrial" land use designations and uses. While there are some residential uses in this area, the majority of land uses are non-residential. Heavy truck traffic can be expected in this area, affecting future roadway design and maintenance.

The Project site is also located within the northern portion of the Perris Valley Commerce Center (PVCC) area, which encompasses more than five square-miles and over 3,500 acres in the northern end of the City. The PVCC area is relatively flat, sloping in a southeasterly direction with elevations ranging from 1,430 to 1,500 feet above mean sea level. (PVCCSP, p. 1.0-1, 1.0-5). The City lies on the Perris Block, a 20- by 50-square-mile mass of crystalline rocks generated during the Cretaceous time period (Perris Comprehensive General Plan 2030. (Perris GP 2030 Safety Element, p. 26.) The Project site is located on land designated by the California Department of Conservation in its Farmland Mapping and Monitoring Program as "Prime Farmland," "Farmland of Local Importance." and "Urban and Built-Up Land" as shown in **Figure 3.0-16 – Farmland Map**. It is also located within the San Jacinto River Watershed, which drains an approximately 540-square-mile area of western Riverside County. The 250-foot-wide Perris Valley Channel is the major tributary to the San Jacinto River within the City and flows from north to south through southern Moreno Valley and Perris. (Perris GP 2030 EIR, p. IV-48.)

3.2 Site Description

The Project site and off-site improvement area are relatively flat, with elevations averaging 1,450 feet above mean sea level. Historically, the Project site and off-site improvement area have been used for agricultural purposes. The Project site is currently unimproved and vacant. The southeast corner was previously developed with a 41,680-square-foot industrial building and associated parking lot and ornamental vegetation landscaping; however, that structure has been removed from the Project site. Views of the Project site and off-site improvement area existing condition are provided on **Figure 3.0-4 – Project Site Photographs.** The Project includes offsite improvements to the Perris Valley Storm Drain Channel which is a regional flood control structure which has been designed to receive storm water flows the Project site.

The Project site and off-site improvement area are located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Mead Valley Area Plan. The Project site is not located within an MSHCP Criteria Cell, Cell Group, or Linkage Area. In addition to the previous development, the Project site contains disturbed vegetation that receives frequent weed abatement (i.e., chain flail mowing, disking).

3.2.1 Existing General Plan Land Use and Zoning Designation

The Project site is located within Planning Area 1, North Industrial, of the City of Perris, which consists of approximately 1,925 acres and is bounded by March Air Reserve Base/Inland Port Airport (March ARB/IPA) to the north, Interstate 215 (I-215) to the west, City limits near Lake Perris to the east, and Ramona Expressway to the south. Planning Area 1 is primarily made up of land designated for industrial use with very little area designated for residential use. The industrial planning of Planning Area 1 is based upon the restrictions placed on properties in this area due to flight operations of March ARB/IPA. The area to the west of Planning Area 1 is unincorporated Riverside County but is within the City's Sphere of Influence and is zoned for manufacturing under the Riverside County Zoning Ordinance. The Project site has a General Plan land use designation of PVCC SP - Perris Valley Commerce Center Specific Plan as shown on **Figure 3.0-5 – General Plan Land Use Designation**. The Perris Valley Commerce Center Specific Plan (PVCCSP) establishes the zoning for the properties within the PVCC area. The PVCCSP zoning designation for the Project site is General Industrial as shown on **Figure 3.0-6 – Specific Plan Zoning Designation**. The off-site improvement area is located mostly within Indiana Avenue and Harley Knox Boulevard rights-of-way, and within the Perris Valley Storm Drain Channel Lateral B, a Riverside County Flood Control and Water Conservation District storm drain facility.

3.2.2 Perris Valley Commerce Center Specific Plan

On January 10, 2012, the City Council adopted the PVCCSP for the PVCC area that encompasses approximately 5.23 square-miles in North Perris located east of I-215 and west of the Perris Valley Storm Drain, south of March ARB/IPA, and north of Placentia Avenue. This area provides convenient access to a multi-directional freeway system via I-215 traveling north and south and State Route 60 (SR-60) traveling east and west as well as access to March ARB/IPA for air transport. The PVCCSP Land Use Plan envisions this area to be a concentrated commerce center with a balanced mix of industrial uses including Business Professional Office, Light Industrial, and General Industrial.

The Project site is designated as General Industrial in the PVCCSP (**Figure 3.0-6**). The site is surrounded by areas designated as General Industrial to the south and west, Light Industrial to east, and the City of Moreno Valley to the North.

The General Industrial land use designation provides for the development of basic industrial uses which may support a wide range of manufacturing and non-manufacturing uses, from large-scale warehouse and warehouse/distribution facilities to outdoor industrial activities.

Section 3.0 of the PVCCSP also outlines land use planning and design standards to assist in accommodating future development proposals and provides suitable transitions to neighboring land uses. Additionally, the PVCCSP outlines green development practices to encourage and require construction methods and materials that have a lower environmental impact. The proposed Project would be required to comply with all design guidelines, landscape guidelines, and relevant policies outlined in the PVCCSP as well as the City of Perris General Plan.

3.2.3 Surrounding Land Uses

The area to the north of the Project site is located within the City of Moreno Valley. The area surrounding the Project site is dominated by vacant land and existing industrial uses as shown on **Figure 3.0-2** above, and as described in **Table 3.0-A – Surrounding Land Uses**, below.

Table 3.0-A – Surrounding Land Uses

Location	Existing Land Usage	General Plan Land Use Designation	Zoning Designation
Project Site	**Unimproved/Vacant Land, Warehouse Building that was demolished September 2023**	**PVCC SP - Perris Valley Commerce Center Specific Plan**	**PVCCSP - General Industrial**
North	Perris Valley Storm Drain Channel Lateral B; City of Moreno Valley Industrial uses and vacant land	Business Park/Light Industrial, Open Space (City of Moreno Valley)	SP2081- Industrial / Business Park, Open Space (City of Moreno Valley)
East	Warehouse	PVCC SP - Perris Valley Commerce Center Specific Plan	PVCCSP - Light Industrial
South	Vehicle auction/storage and asphalt manufacturing	PVCC SP - Perris Valley Commerce Center Specific Plan	PVCCSP - General Industrial
West	Vacant land	PVCC SP - Perris Valley Commerce Center Specific Plan	PVCCSP - General Industrial

3.2.4 Airport Land Use

The Project site and off-site improvement area are located approximately 5.9 miles to the northwest of Perris Valley Airport and are located outside of the Perris Valley Airport Influence Area. However, the Project site and the off-site improvement area are located within the March Air Reserve Base/Inland Port Airport Comprehensive Land Use Plan Compatibility Zones A, B1-APZ I, B2, and C1 as shown on **Figure 3.0-7 – March Air Reserve Base /Inland Port Airport Compatibility Zones**.

In 2014, and subsequent to approval of the City of Perris General Plan, the Riverside County Airport Land Use Commission (ALUC) adopted the 2014 March ARB/IPA Airport Land Use Compatibility Plan (ALUCP). Thus, the City was required to update its General Plan to reflect the new ALUCP. The City created an Airport Overlay Zone (AOZ) to accommodate development within the City consistent with the land use designations of the 2014 March ARB/IPA ALUCP. On July 14, 2016, the Riverside County ALUC determined that the City's AOZ is consistent with the 2014 March ARB/IPA ALUCP.

The Initial Study, included as Appendix A of this Draft EIR, includes an analysis that shows how the Project is consistent with ALUCP and why the Project is not required to obtain an ALUC consistency determination.

3.2.5 Vehicular Circulation and Site Access

Regional access to the Project site is provided via Interstate 215 (I-215) located approximately two miles west of the Project site. Existing roadways adjacent to the Project site include Harley Knox Boulevard and Indian Avenue. There was an industrial development at the southeastern corner of the Project site, that was demolished in September 2023, that included access via three driveways. Due to the existing medians on Harley Knox Boulevard and Indian Avenue, only one driveway had full access (right-in/right-out and left-in/left-out) to the now demolished building. The City of Perris General Plan Circulation Element circulation designations and the current roadway conditions are described below: (Perris GP 2030 Circulation Element, pp. 24, 30, 41.)

- Harley Knox Boulevard is an east-west six-lane with a raised median roadway designated for 128 foot of right-of-way classified as an Arterial. From Redlands Avenue to I-215, Harley Knox Boulevard is a designated truck route. Harley Knox Boulevard, from Lake Perris Drive to Webster Avenue, is designated as a Class I Shared-Use Path. A Class I Shared-Use Path or Multipurpose Path provides paths completely separated from motor vehicle traffic for use by people walking and biking. Currently, Harley Knox Boulevard has a raised median throughout portions of the Project site's frontage. Portions of the northern half of Harley Knox Boulevard are unimproved and do not contain sidewalks, streetlights, gutters, or the Class I Shared-Use Path. Although, not designated, Harley Knox Boulevard's northern half contains a Class II Bikeway (Bike Lanes). Class II Bike Lanes provide one-way bike travel on a street or highway.
- Indian Avenue is a north-south four-lane roadway with a raised or painted median, designated for 94 foot of right-of-way classified as a Secondary Arterial. From the City's northern limits to Placentia Avenue, Indian Avenue is a designated truck route. Currently, Indian Avenue has a raised median and varies from three lanes at Harley Knox Boulevard to two lanes north of the Project site, where the two northbound lanes merge into a single lane to pass over the existing bridge. Portions of the Project site's frontage are currently unimproved and do not contain sidewalk, or curb and gutter.

3.2.6 Existing Utility Infrastructure

Water

Domestic water services in the Project vicinity are provided by the Eastern Municipal Water District (EMWD). There are existing water lines near the Project site: a12-inch-diameter water line in Harley Knox Boulevard and Indian Avenue. There is also an existing 12-inch-diameter water line in Webster Avenue. (PVCCSP, p. 3.0-16.)

Recycled Water

Recycled water service in the Project vicinity is also provided by the EMWD. The EMWD maintains a 12-inch recycled water line in Indian Avenue that is capped and ends approximately 166 linear feet north from the Harley Knox Boulevard and Indian Avenue intersection. There are recycled water lines within Nance Street, south of the Project site, and Redlands Avenue east of the Project site. (PVCCSP, p. 3.0-19.) There are no other existing recycled water lines adjacent to the Project site.

Sewer

Sewer (wastewater) collection and treatment services in the Project vicinity are also provided by the EMWD. The EMWD maintains an existing 15-inch-diameter sewer main (flows east) in Harley Knox Boulevard along the Project site's frontage and an existing 12-inch-diameter sewer main (flows south) in Indian Avenue along the Project site's frontage.

Storm Drain

The Project site is located within the Perris Valley Master Drainage Plan within the San Jacinto River watershed, which is part of the larger Santa Ana River watershed. The Perris Valley Storm Drain Lateral B (hereinafter "Lateral B") is an existing Riverside County Flood Control and Water Conservation District storm drain facility that is located adjacent to the north of the Project site. (Refer to **Figure 3.0-2 – Aerial Map**.) Lateral B is an earthen channel that conveys stormwater with other tributaries and flows southerly to the San Jacinto River. Additionally, there is an existing City of Perris 18-inch-diameter storm drain in Indian Avenue that extends to a portion of Harley Knox Boulevard. This storm drain conveys runoff easterly in Harley Knox Boulevard then northerly in Indian Avenue to Lateral B.

Other Utilities

Existing development utility services are provided by the purveyors identified in **Table 3.0-B – Utility Purveyors**.

Table 3.0-B – Utility Purveyors

Services Provided	Purveyor
Water/Recycled Water	EMWD
Sewer	EMWD
Telephone	Verizon/Frontier
Electricity	Southern California Edison
Natural gas	Southern California Gas Company
Solid Waste Disposal	CR&R Incorporated
Cable Television/Internet	Frontier Communications
Source: PVCCSP and W&R	

There are existing utilities in the surrounding and offsite roadways as follows:

- Indian Avenue – There are two existing power poles and a streetlight along Indian Avenue, within the Project site's frontage. The northern portion of Indian Avenue, along the Project site's frontage, contains above ground telephone and electricity lines. The southern portion of Indian Avenue contains underground telephone and electricity lines.

- Harley Knox Boulevard – There are five (5) existing streetlights along Harley Knox Boulevard, within the Project Sites' frontage. There is an existing 6-inch-diameter gas line in Harley Knox Boulevard.

3.2.7 Public Transit

Regional bus service in Western Riverside County, including the City, is provided by the Riverside Transit Agency, also known as RTA. Currently, the RTA operates two bus routes within the PVCC area; Routes 19 and 41. The closest bus route to the Project site is Route 19. The closest bus stop to the Project site is the Perris Boulevard and Ramona Expressway stop, which is approximately 0.5 mile southeast of the Project site.

Metrolink provides heavy-rail, regional transit service to the counties of Los Angeles, San Bernardino, Orange, Ventura, San Diego, and Riverside. The Metrolink stations closest to the Project site are the Moreno Valley/March Field Station and the Perris Downtown Metrolink Station; approximately 4.6 miles northwest and 5.1 miles south of the site, respectively.

Greyhound Bus Lines provides private transportation services that link the principal population centers of the County with other regions. This includes east-west service connecting Blythe, Indio, Palm Springs, Banning/Beaumont, and Riverside (via San Bernardino). The service continues westward to downtown Los Angeles and intermediate stops. North-south service connects Riverside with Temecula, continuing southward to San Diego. The number of bus trips in each direction ranges from five to eight per day. (Perris GP 2030 Circulation Element, p. 24.)

3.3 Project Characteristics

The proposed Project includes the following entitlement applications for consideration by the City of Perris:

- Tentative Parcel Map (TPM) 38684: Consolidate the existing seven (7) parcels into one parcel and dedicate portions of the Project site to Harley Knox Boulevard and Indian Avenue Road right-of-way as per **Figure 3.0-8 – Tentative Parcel Map 38684.**

- Development Plan Review (DPR) 22-00016: Develop a 25.10-gross-acre site with a 549,786-square-foot industrial high-cube non-refrigerated speculative warehouse distribution building per **Figure 3.0-9 – Site Plan**. In addition to the 25.10-gross-acre Project site, 1.10 acres of off-site improvements are included.

3.3.1 Proposed Project

The First Industrial Logistics at Harley Knox and Indian Project and off-site improvement area (collectively referred to as proposed Project or Project) involves the merging of seven (7) parcels for the construction and operation of an approximately 549,786-square-foot non-refrigerated warehouse building including infrastructure, appurtenances, associated parking areas, and associated offsite supporting improvements. The proposed warehouse building would accommodate high-cube warehouse distribution uses, anticipating that approximately 10,000 square-feet could be utilized for supporting office and mezzanine uses. Pursuant to the PVCCSP Guidelines, the building would include solar-ready rooftop panels. The Project would include a total of 94 dock doors on the north side of the building. Based on the employment projection factor for light industrial uses per the PVCCSP, the

Project is anticipated to create approximately 542 jobs. The proposed Project would be constructed as a speculative or "spec" building; that is, there is not a specific tenant identified at this time. It is anticipated that the building could operate 24 hours a day, seven days a week. The warehouse is not anticipated to include e-commerce.

As shown on **Figure 3.0-10-A – Building Elevations**, **Figure 10-B – Building Elevations**, and **Figure 10-C – Building Elevations,** the design of the building is modern industrial and includes concrete tilt-up wall construction with board-formed cement veneer and standard window glazing. The proposed building height is 48 feet, which would not exceed the City's maximum standard of 50 feet. Consistent with the Perris Municipal Code, Chapter 19.44 Industrial Zones and PVCCSP Chapter 8.2.1.4 Employee Break Areas and Amenities, two outdoor employee break areas with canopies and tables are proposed; one adjacent to the western office and the other adjacent to the eastern office as shown on **Figure 3.0-9**. Additionally, a bocce ball area would be included near the western passenger parking area, to the north of the eastern passenger parking area. Future tenants would provide an indoor employee amenity area as required by the PVCCSP.

Project Site Access

The Project site would be accessed by three driveways, one along Harley Knox Boulevard and two along Indian Avenue as shown on **Figure 3.0-9**. Automobile vehicles would access the Project site via two of the driveways: the driveway along Harley Knox Boulevard and the southerly driveway along Indian Avenue. Trucks would only access the Project site via one driveway: the northerly driveway along Indian Avenue. The trucks would stop at the guard shack to access the loading areas that are located on the northern side of the building. Emergency vehicle access would be available from the northerly Indian Avenue driveway and from the Harley Knox Boulevard driveway. The existing median on Indian Avenue would be modified to allow a left turn to access the Project site's proposed truck driveway. (See **Figure 3.0-9.**) The Indian Avenue northbound lanes would include an approximate 95-foot median transition with an approximate 150-foot left turn pocket so that trucks could access the Project site. The Indian Avenue southbound lanes would be striped for two southbound lanes starting from the Project's frontage to the Indiana Avenue and Harley Knox Boulevard intersection.

Parking

The automobile parking areas would be physically separated from the trucks' path of travel by the building and an 8-foot-high manually operated metal gate containing view obscuring mesh and a Knox-pad for emergency vehicle access. This design provides separation between automobile and truck circulation. The Project would provide a total of 188 automobile parking stalls, which includes 147 standard stalls, 5 Americans with Disabilities Act-compliant (ADA) stalls, and 1 ADA van stall. The current site plan shows that 35 standard electric vehicle stalls, 9 electric vehicle charging stations, 1 ADA electric vehicle charging station, 1 van electric vehicle charging station, and 1 ambulatory electric vehicle charging station would be provided. However, these numbers are based on the current requirements of Section 5.106.5.3.1 of the 2022 California Green Building Standards (CALGreen) Code, Title 24, Part 11. The 2025 CALGreen Code takes effect on January 1, 2026 and the Project would need to provide at least 18 spaces with EV chargers at the time of opening if its building permits are approved after 2025. Automobile parking would be provided on the east and west side of the building near the office areas. The Project also includes 132 trailer parking stalls. Bike racks would also be provided at the Project site for employee use, per PVCCSP guidelines.

Pedestrian Circulation

To avoid potential conflicts between pedestrians walking between the passenger car parking lots and the office areas, the pedestrian paths of travel are provided between passenger vehicle parking areas and the office areas, away from the trucks' path of travel.

Portions of the existing sidewalk along the Project's frontage in Harley Knox Boulevard and Indian Avenue would be removed in order to construct curb and gutter, new sidewalks, and a multipurpose trail per PVCCSP and City standards. Improvements to Harley Knox Boulevard would include a 12-foot-wide parkway multipurpose lane. The multipurpose lane includes a 4-foot pedestrian path (two 2-foot-wide decomposed granite pedestrian paths), and an 8-foot-wide plain cement concrete bicycle path per PVCCSP and City standards. Improvements to Indian Avenue would include a 12-foot parkway multipurpose lane. The multipurpose lane includes a 4-foot pedestrian path, (two 2-foot-wide decomposed granite pedestrian paths), and an 8-foot-wide plain cement concrete bicycle path. In addition to the multipurpose lane, the Project would include a new 4-foot-wide sidewalk and 6-inch-wide mow curb along the Project frontage, as needed. The existing Class II Bike lanes along Harley Knox Boulevard would remain and would be repainted.

Screening and Landscaping

The Project would include screening and landscaping, consistent with City and PVCCSP standards, and include 14-foot-high screen walls and an 8-foot wrought iron fence along the perimeter of the proposed building, as shown on **Figure 3.0-11-A – Screening Details and Figure 11-B – Screening Details**. The proposed landscaping consists of drought-tolerant and climate appropriate trees, shrubs and ground cover that include native species that meet or exceed standards set forth in the PVCCSP as shown on **Figure 3.0-12 – Conceptual Landscape Plan**. The landscape plan has been designed to provide visual appeal and screen the views of the passenger vehicle parking lots from public rights-of-way as shown on **Figure 3.0-13 – Line of Sight**.

All roof mounted mechanical equipment would be set back and fully screened from public view behind a parapet. Trash enclosures would be approximately eight feet in height and utilize concrete tilt-up panels consistent with the proposed buildings.

Lighting

Project lighting would include security lights along the buildings and screen walls and pole-mounted lights in the parking areas. All Project-related lighting shall be designed, installed, and operated in conformance with the Perris Municipal Code.

3.3.2 Infrastructure Improvements

Potable Water

The Project would connect to the 12-inch-diameter potable water line in Harley Knox Boulevard and the 12-inch-diameter potable water line in Indian Avenue for potable water, landscape irrigation, and fire water pump for fire flow demands. Specifically, a 2-inch lateral connection for potable water, a 2-inch lateral connection for landscape irrigation, and a 12-inch-diameter lateral connection for fire services are proposed as shown in **Figure 3.0-14 – Existing and Proposed Utilities**. No offsite potable water line improvements are needed to serve the Project.

Recycled Water

Because there are no existing recycled water lines adjacent to the Project site, other than the capped 12-inch-diameter recycled water line in Indian Avenue, recycled water connections are not proposed at this time. As described above, a 2-inch-diameter potable water line lateral connection is proposed for landscape irrigation. No offsite recycled water line improvements are needed to serve the Project.

Sewer

The Project includes a proposed 6-inch-diameter lateral sewer line to connect to the EMWD's existing 15-inch diameter sewer line in Harley Knox Boulevard. No offsite sewer line improvements are needed to serve the Project.

Storm Drain

The Project applicant proposes onsite curb and gutter and subsurface storm drains that would direct all onsite stormwater and nuisance runoff in subsurface storm drains to underground detention chambers located within the Project site, as shown on (see **Figure 3.0-8**). Following water quality treatment, stormwater would discharge to Lateral B, an earthen channel located north of the Project site, consistent with the Perris Valley Master Drainage Plan. As part of the Project, an outfall structure would be constructed outside of the Project site, within Lateral B, as shown on **Figure 3.0-8**. The outfall structure includes a concrete end wall that would convey onsite stormwater into the Lateral B channel. The outfall structure would also include riprap to dissipate stormwater flows. Because the outfall structure would be constructed within the Perris Valley Storm Drain, the Lateral B connection to this facility would most likely require regulatory permits from the California Department Fish and Wildlife and the Santa Ana Regional Water Quality Control Board. The final design of the outfall structure would be finalized during final engineering.

Utilities

Future development of the proposed Project site would require on-site network of water, sewer, storm drain, electric, and gas utility services. Currently there are existing water lines, sewer lines, telecommunications, and electrical lines provided by the purveyors identified in **Table 3.0-B – Utility Purveyors**. As part of the Project, the following utility improvements and relocations would be made:

- Indian Avenue – The two existing power poles along Indian Avenue would be undergrounded, and the streetlight would be relocated within the Indian Avenue right-of-way.

- Harley Knox Boulevard – The existing five (5) streetlights would be relocated within the Harley Knox Boulevard right-of-way.

3.3.3 Offsite Improvements

All potential offsite improvements associated with pedestrian improvements, road improvements, and the outfall structure are discussed in *Sections 3.3.1 and 3.3.2*.

3.3.4 Construction and Site Preparation

Project site construction would involve grading and earthwork within the Project site boundaries to accommodate the proposed warehouse structure, infrastructure, appurtenances, and associated parking areas as shown on **Figure 3.0-15 – Grading Plan**. The proposed warehouse building includes

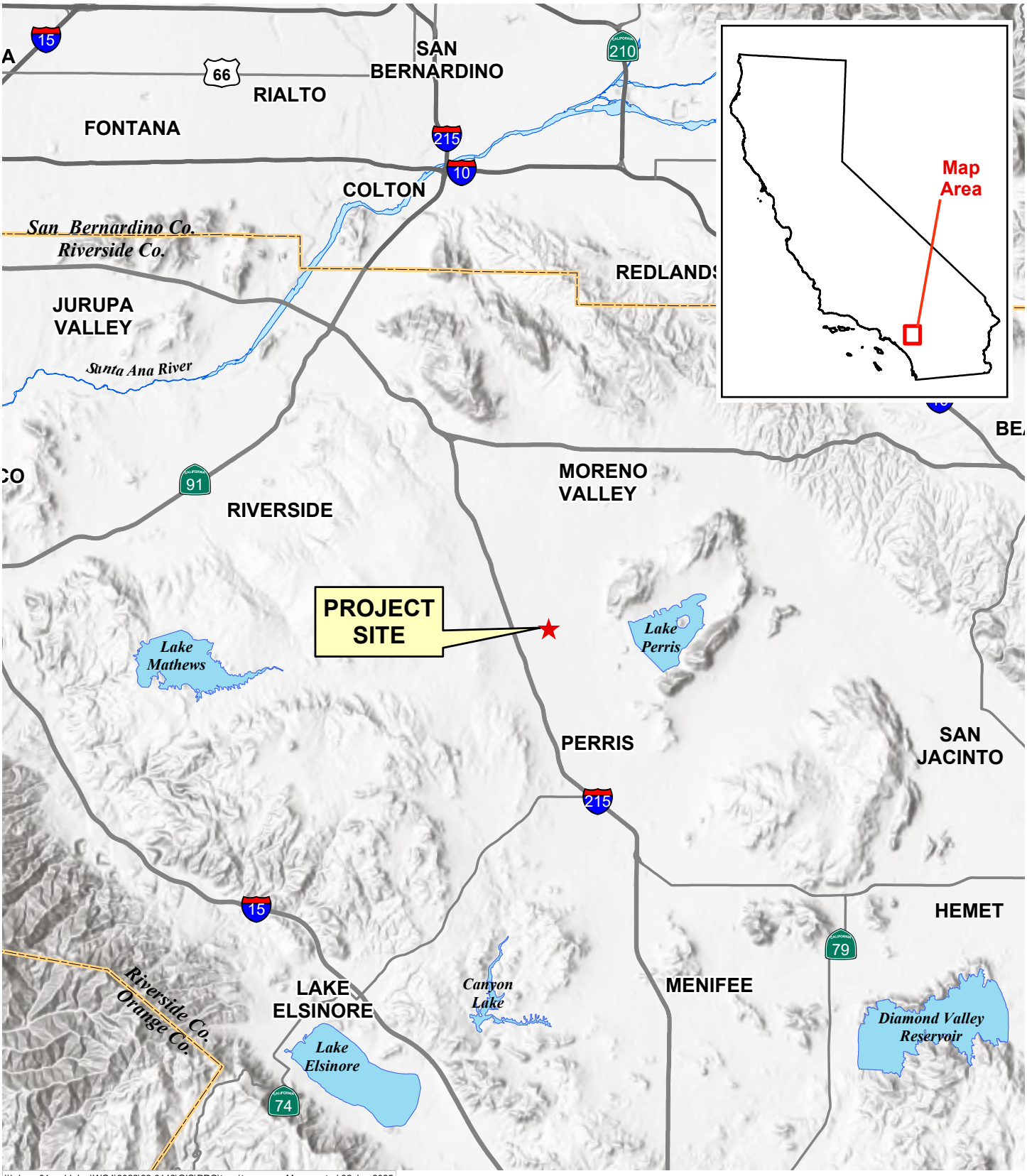
concrete tilt-up wall construction. Nighttime pouring of concrete is anticipated during summer months. The Project site grading is expected to balance onsite so no soil import or export is anticipated.

Prior to grading operations, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared in accordance with the requirements of the statewide general National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for stormwater discharge from construction sites. The SWPPP would include Project-specific best management practices (BMPs) to reduce erosion and sedimentation and is subject to oversight and enforcement by the City and/or Santa Ana Regional Water Quality Control Board. BMPs may include, but not be limited to, soil stabilization controls, perimeter silt fences, placement of hay bales, and use of sediment basins. All erosion and sediment controls would be in accordance with the currently adopted state general permit. The Project developer and construction contractor would be responsible for implementing the BMPs in accordance with the SWPPP.

The Project would be constructed in a single phase for a duration of approximately 11.5 months. For the purposes of the Air Quality/Greenhouse Gas Analysis, construction of the Project was modeled starting in June 2025 which represents a worst-case analysis. The duration of construction activity (and associated equipment) represents a reasonable approximation of the expected construction activities as required per the CEQA Guidelines.

FIGURE 3.0-1

Regional Map



\\brkpan01.webb.lan\WO4\2022\22-0142\GIS\PRO\topo\topo.aprx Map created 02 Jun 2025

ALBERT A. WEBB ASSOCIATES

0 5 10 Miles

Source: Riverside County GIS, 2020

FIGURE 3.0-2

Aerial Map



LEGEND

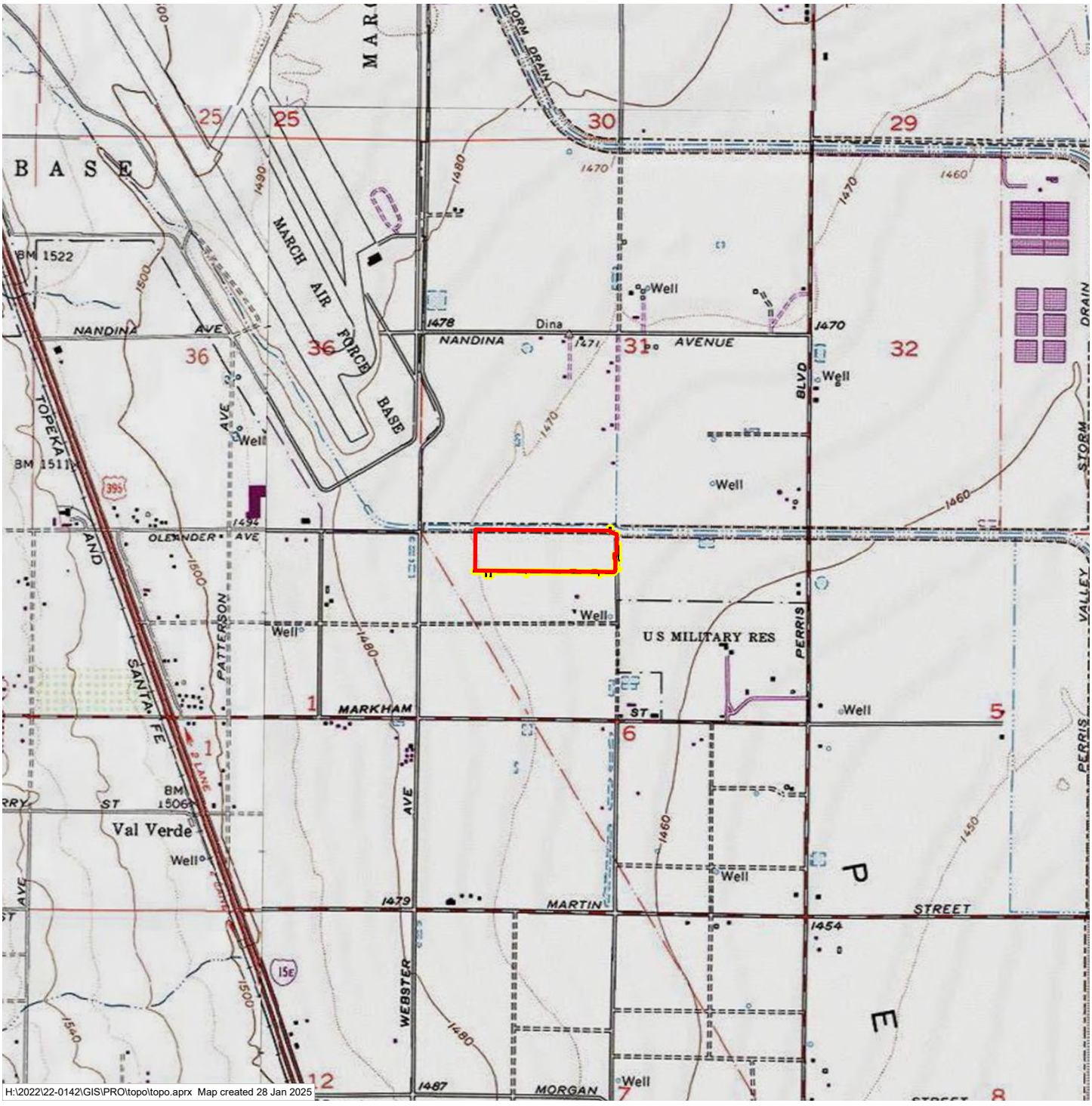
- Project Boundary
- Offsite Disturbance Footprint

0 137.5 275 Feet

Source: Nearmap, 2024.

ALBERT A. WEBB ASSOCIATES

FIGURE 3.0-3 USGS Topographic Map



LEGEND

- Project Boundary
- Offsite Disturbance Footprint

0 1,000 2,000 Feet

Sources: ESRI / USGS 7.5min Quads: Perris, Riverside East, Steele Peak, Sunnymead.

ALBERT A. WEBB ASSOCIATES

FIGURE 3.0-4

Project Site Photographs



SW Corner - Facing North



SW Corner - Facing Northeast



SW Corner - Facing East



SE Corner - Facing West



SE Corner - Facing Northwest



SE Corner - Facing North



NE Corner - Facing West



NE Corner - Facing Southwest

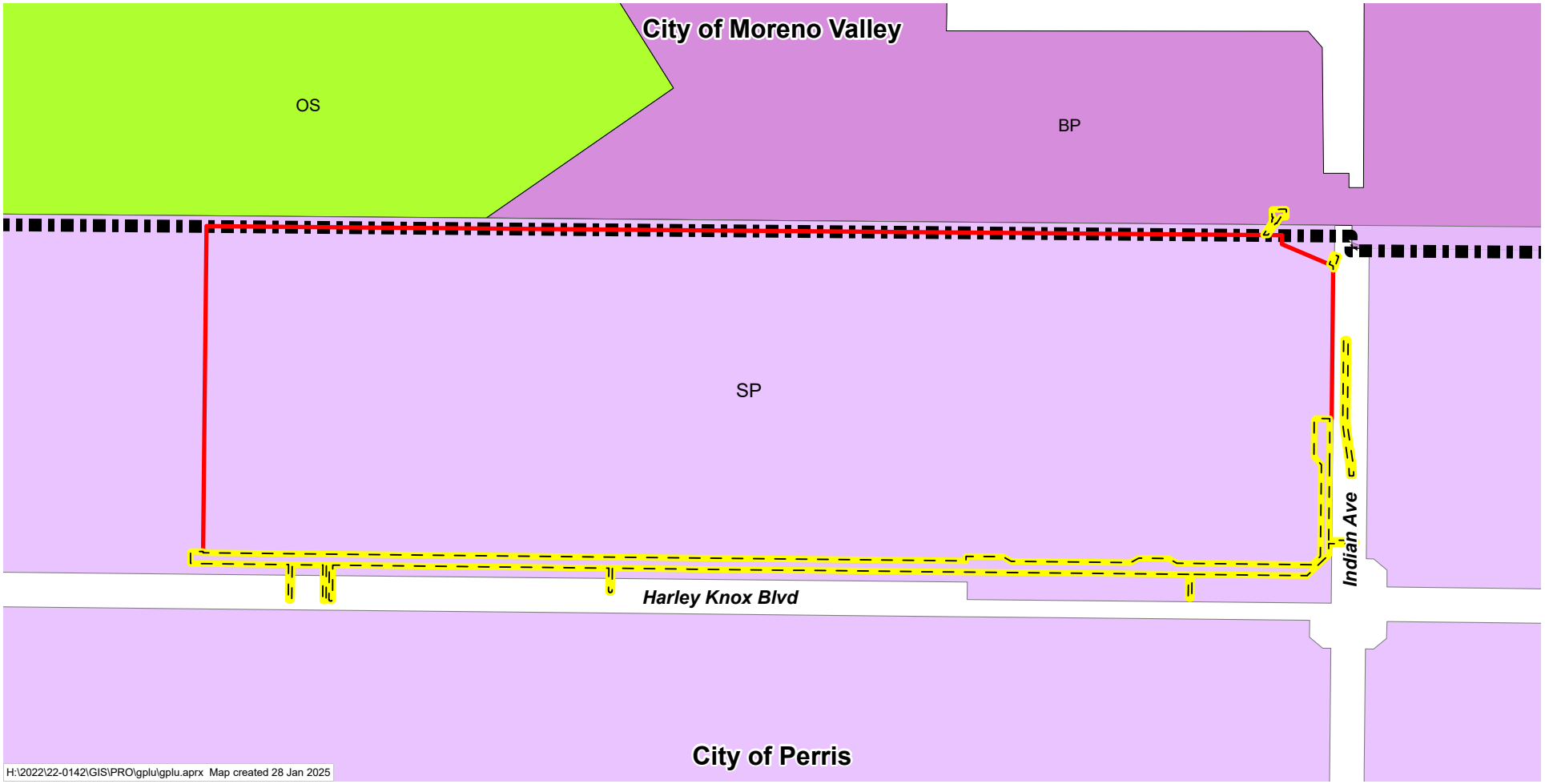


NE Corner - Facing South

ALBERT A. WEBB ASSOCIATES

FIGURE 3.0-5

General Plan Land Use Designation



LEGEND

- Project Boundary
- Offsite Disturbance Footprint

Perris GP Land Use Designation

- PVCC Specific Plan

Moreno Valley GP Land Use Designation

- Business Park/Light Industrial
- Open Space
- Cities

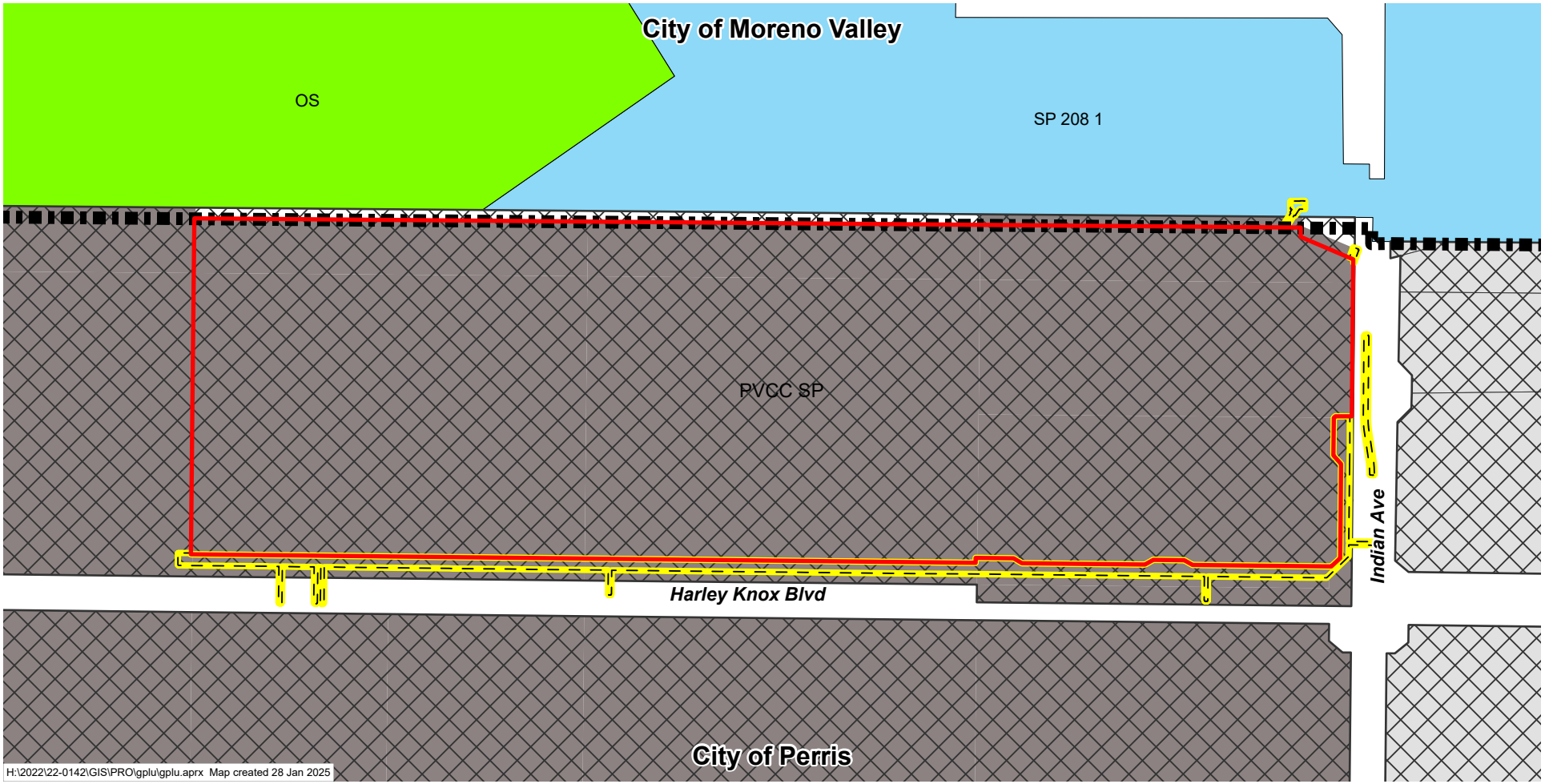
0 140 280 Feet

Sources: City of Perris General Plan Land Use, 2018; City of Moreno Valley, 2019.

ALBERT A. WEBB ASSOCIATES

FIGURE 3.0-6

Specific Plan Zoning Designation



LEGEND

- Project Boundary
- Offsite Disturbance Footprint
- Cities

Moreno Valley Zoning

- Industrial/Business Park
- Open Space/Park

Perris Zoning

- Perris Valley Commerce Center General Industrial SP

PVCCSP Zoning

- Light Industrial
- General Industrial

0 137.5 275 Feet

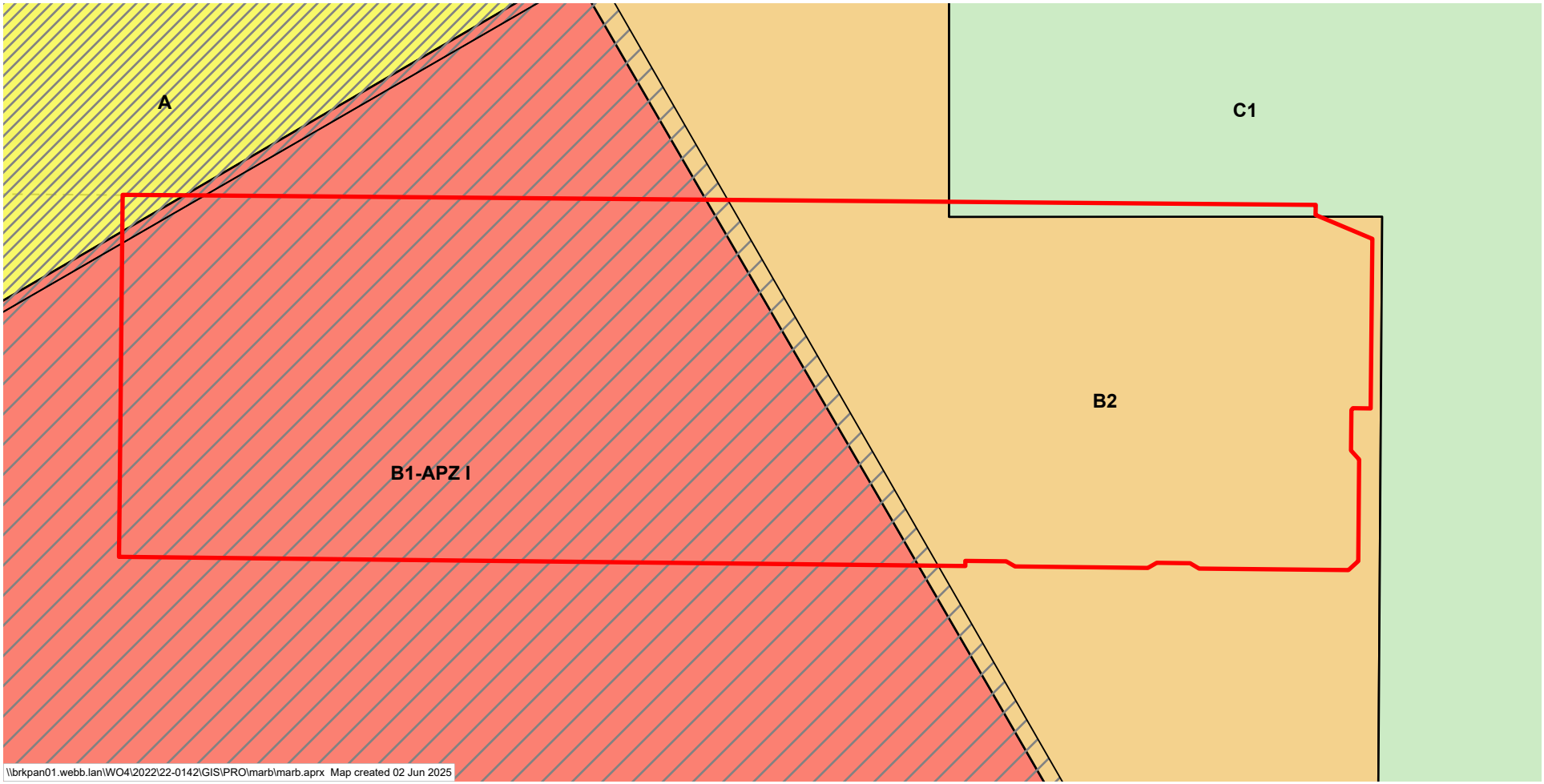
Sources: City of Perris General Plan Land Use, 2010; City of Moreno Valley Zoning, 2022.

ALBERT A. WEBB ASSOCIATES

FIGURE 3.0-7

FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

March Air Reserve Base/Inland Port Airport Compatibility Zones



LEGEND

Project Boundary

March Air Reserve Base Airport Compatibility Zones

- Zone A
- Zone B1-APZ I
- Zone B2
- Zone C1

Accident Potential Zones

- Clear Zone
- APZ I

0 125 250 Feet

Sources: Accident Potential Zones, 2008; Airport Compatibility Zones, 2024; Nearmap, 2024.

ALBERT A. WEBB ASSOCIATES

FIGURE 3.0-8

Tentative Parcel Map 25-0004 (TPM 38684)

TENTATIVE PARCEL MAP NO. 38684

IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

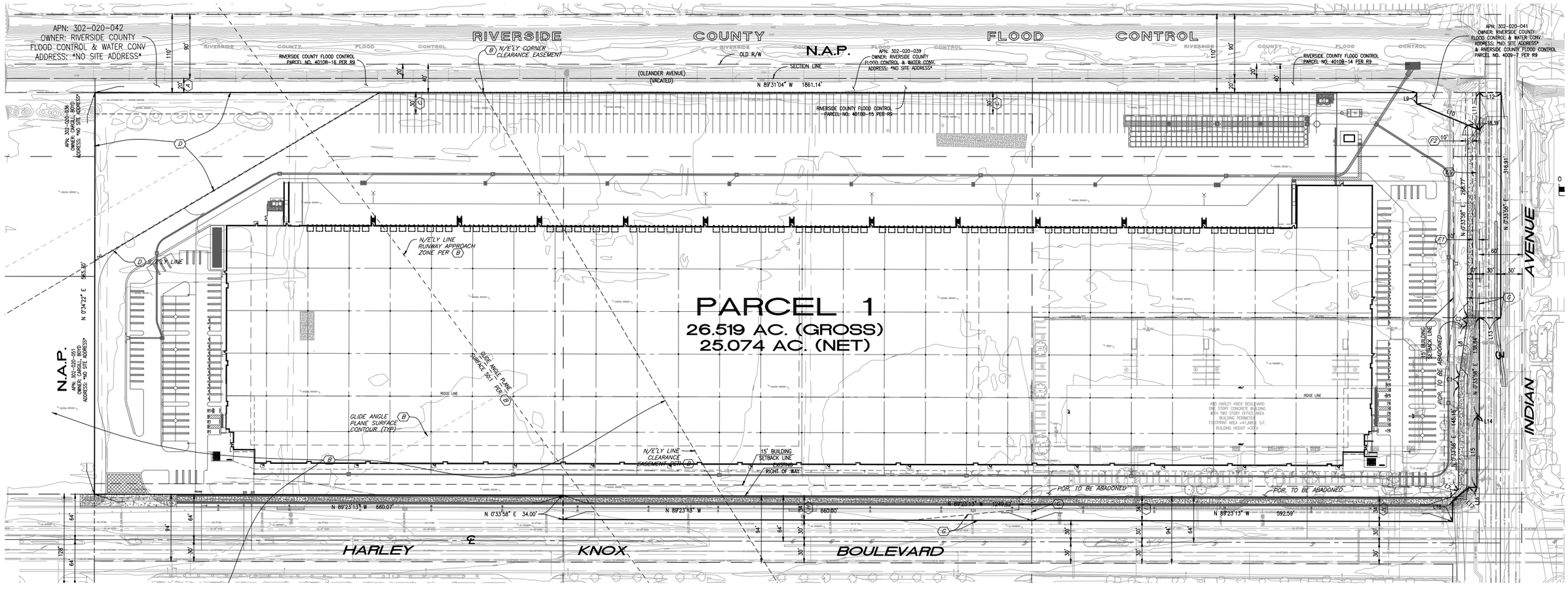
BEING A SUBDIVISION OF PORTIONS OF LOTS 1, 2 AND 3, BLOCK 3 OF RIVERSIDE TRACT, AS PER MAP RECORDED IN BOOK 14, PAGE 668 OF MAPS, RECORDS OF SAN DIEGO COUNTY.

APNs:

302-020-013
302-020-028
302-020-038
302-020-043
302-020-048

NOTES:

DATE OF PREPERATION: 05-25-2022
GROSS ACREAGE: 22.418
NET ACREAGE: 21.580
ANY EXISTING BUILDINGS SHOWN HEREON WILL BE REMOVED
TOTAL OF NUMBERED PARCELS: 1
TOTAL OF LETTERED LOTS: 0



\\brkpan01.webb.lan\WO4\2022\22-0142\GIS\PRO\engineering_templates\engineering_templates.aprx Map created 22 May 2025

NTS

Sources: First Industrial Realty Trust, Inc., HPA Architecture, and Thienes Engineering, Inc., Mar. 20, 2023

ALBERT A. WEBB ASSOCIATES

FIGURE 3.0-9

Site Plan

PROJECT DATA

	BLDG. 2
SITE AREA	
In s.f.	1,094,727 s.f.
In acres	25.13 ac
BUILDING AREA	
Office - 1st floor	5,000 s.f.
Office - 2nd floor	5,000 s.f.
Warehouse	539,786 s.f.
TOTAL	549,786 s.f.
COVERAGE	49.8%
F.A.R. -	0.502
AUTO PARKING REQUIRED	
Office: (office area is less than 10%)	
Whse: 1st 20K @ 1/1,000 s.f.	20 stalls
2nd 20K @ 1/2,000 s.f.	10 stalls
above 40K @ 1/5,000 s.f.	102 stalls
TOTAL	132 stalls
AUTO PARKING PROVIDED	
Standard (9' x 19')	102 stalls
Standard (11' x 19')	42 stalls
Accessible Parking (Standard)(9'x18')	5 stalls
Accessible Parking (Van) (12'x18')	1 stalls
Standard EV Spaces (9' x 19')	32 stalls
Standard EVCS (9' x 19')	9 stalls
Accessible EVCS Parking (Standard) (9'x18')	1 stalls
Accessible EVCS Parking (Van) (12'x18')	1 stalls
Accessible EVCS Parking (Ambulatory) (12'x18'	1 stalls
TOTAL	185 stalls
TRAILER PARKING REQUIRED	
Trailer: 1/5,000 SF	110 stalls
TRAILER PARKING PROVIDED	
Trailer (10' x 55')	132 stalls
ZONING ORDINANCE FOR CITY	
Zoning Designation - Perris Valley Commerce Center - General Industrial	
MAXIMUM BUILDING HEIGHT ALLOWED	
Height - 50'	
MAXIMUM FLOOR AREA RATIO	
FAR - 75	
MAXIMUM LOT COVERAGE	
Coverage - 50%	
LANDSCAPE REQUIREMENT	
Percentage - 10%	109,473 s.f.
LANDSCAPE PROVIDED	
In s.f.	183,438 s.f.
Percentage	16.8%
SETBACKS	
Harley Knox - 15'	
Side/ Rear - none, adjoining R zone- 20'	

SITE PLAN KEYNOTES

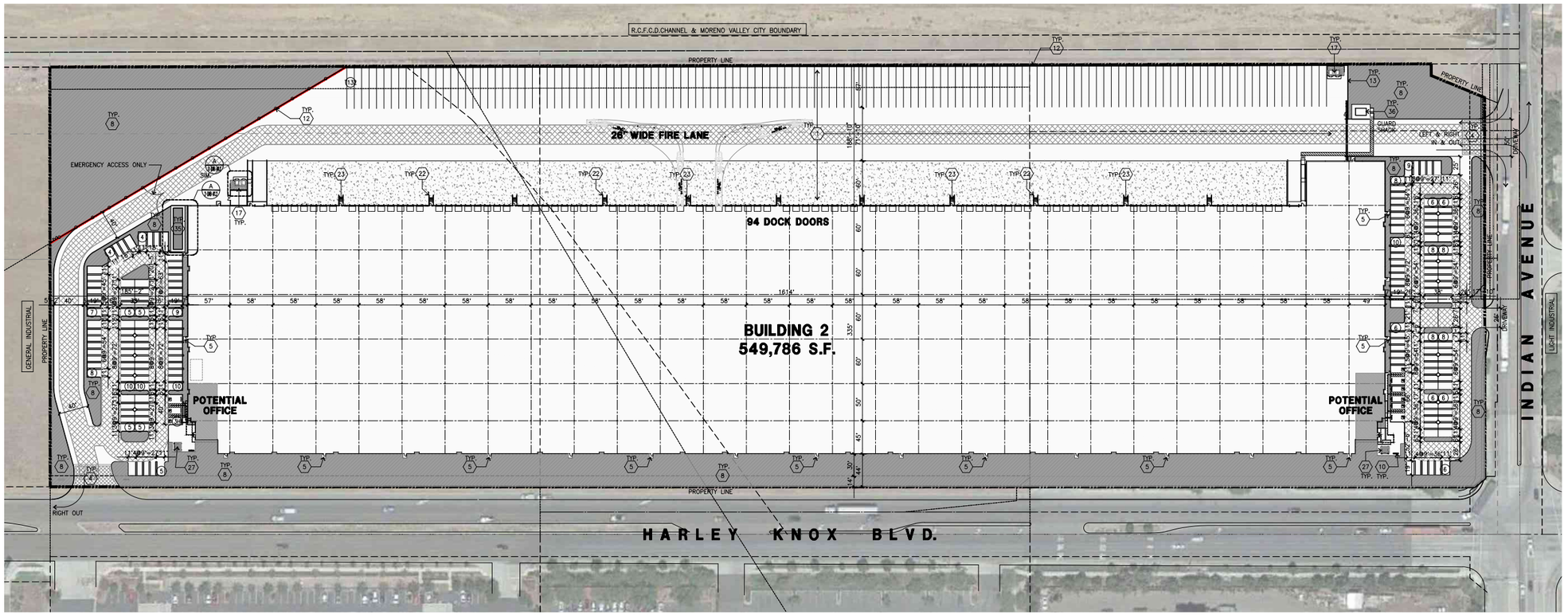
1. HEAVY BROOM FINISH CONC. PAVEMENT.
2. PUMP HOUSE
3. CONCRETE WALKWAY
4. ENHANCED DRIVEWAY APRONS TO BE CONSTRUCTED PER "L" DRAWINGS.
5. 5'-4"x5'-4"x4" MIN. THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. SLOPE TO BE 1/4" : 12" MAX. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY W/ 1:20 MAX. AS REQ. BY CITY INSPECTOR.
6. PROVIDE METAL, MANUAL OPERATED SLIDING GATES W/ PERFORATED SCREEN MESH & KNOX-PAD LOCK PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
7. PROVIDE METAL, MANUAL OPERATED SWING GATES W/ PERFORATED SCREEN MESH & KNOX-PAD LOCK PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
8. LANDSCAPE. SEE "L" DWGS.
9. CONCRETE TILT-UP SCREEN WALL
10. BIKE RACK. PLEASE SEE DETAIL D/DAB-AA.1
11. APPROXIMATE LOCATION OF TRANSFORMER.
12. 8'H WROUGHT IRON FENCE
13. 14' H SCREEN WALL WITH ANTI GRAFFITI COATING
14. ELECTRICAL ROOM
15. PROPOSED SITE LIGHT POLE.
16. PROPOSED STREET LIGHT
17. TRASH ENCLOSURE PER CITY STANDARD.
18. PROPOSED FIRE HYDRANT
19. HANDICAPPED PARKING STALL SIGN
20. HANDICAPPED ENTRY SIGN
21. PRE-CAST CONC. WHEEL STOP
22. CONC. FILLED GUARD POST "6 DIA. U.N.O. 42" H.
23. EXTERIOR CONC. STAIR.
24. CLEAR ZONE. THIS AREA TO BE SECURED FROM ANY OUTDOOR STORAGE AND PARKING. THIS AREA WILL BE UTILIZED FOR ON – SITE DRAINAGE
25. COLOR CONCRETE WITH SCORING LINES AT TRUCK DRIVEWAY
26. EMPLOYEE BREAK AREA WITH PICKLE BALL
27. EMPLOYEE BREAK AREA WITH CANOPY AND TABLE
28. FUTURE INDOOR EMPLOYEE BREAK AREA
29. AUTOMATIC BOOM BARRIER DOUBLE GATE
30. PROPOSED 8' CLASS I MULTIPURPOSE PATH
31. 3' WIDE W SWING GATE W/LOCKSET
32. RAISED PLANTER
33. KNOX BOXES & KNOX DEVICES SHALL BE PROVIDED
34. PROPOSED FIRE DEPT CONNECTION(FDC) LOCATION
35. EMPLOYEE BREAK AREA WITH BOCCE BALL COURT
36. GUARD SHACK

SITE PLAN GENERAL NOTES

1. THE SOILS REPORT PREPARED BY _____ SHOULD BE A PART OF THESE CONTRACT DOCUMENTS.
2. IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM, PRIOR TO INSTALLATION & AT LEAST 60 DAYS BEFORE BLDG. COMPLETION.
6. SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS.
8. CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. SEE "C" DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY W/ 1:20 MAX. SLOPE. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". SEE "L" DRAWINGS FOR FINISH.
11. PROVIDE TWO FIRE HYDRANT ON THE SITE. FINAL LOCATION WILL DETERMINATE IN DURING SUBMITTAL.
12. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
13. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
14. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
15. NOT USED
16. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
17. NOT USED.
18. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB
19. APPROVED CONCEPTUAL LANDSCAPE PLAN PRIOR TO GRADING PERMIT

SITE LEGEND

- LANDSCAPED AREA
- SITE PAVING – SEE "C" DRWGS. FOR THICKNESS
- CONCRETE PAVING SEE "C" DRWGS. FOR THICKNESS
- STANDARD PARKING STALL (9' X 19')
- HANDICAP PARKING STALL (9' X 19')
- 26' FIRE LANE.
- FIRE LANE RED CURBS
- LIGHT STANDARD
- EXISTING PUBLIC FIRE HYDRANT
- PRIVATE FIRE HYDRANT– APPROXIMATE LOCATION F.H.
- PROPERTY LINE
- PATH OF TRAVEL
- TRUCK IN & OUT
- FIRE LANE



PROPERTY OWNER

FIRST INDUSTRIAL REALTY TRUST
898 N. PACIFIC COAST HIGHWAY SUITE 175
EL SEGUNDO, CA 90245
TEL: (310) 414-5400
CONTACT: MICHAEL GOODWIN
MGOODWIN@FIRSTINDUSTRIAL.COM

APPLICANT

FIRST INDUSTRIAL REALTY TRUST
898 N. PACIFIC COAST HIGHWAY SUITE 175
EL SEGUNDO, CA 90245
TEL: (310) 414-5400
CONTACT: MICHAEL GOODWIN
MGOODWIN@FIRSTINDUSTRIAL.COM

APPLICANT'S REPRESENTATIVE

HPA, INC
18831 BARDEEN AVE SUITE 100
IRVINE CA 92612
TEL: 949-862-2116
ATTN: RUBEN CHOI

ADDRESS OF THE PROPERTY

657 HARLEY KNOX BOULEVARD PERRIS, CA

ASSESSOR'S PARCEL NUMBER

302-020-043, 302-020-048,
302-020-013, 302-020-028, 302-020-038
302-020-040, 302-020-032

ZONING

ZONING DESIGNATION - PERRIS VALLEY COMMERCE CENTER
GENERAL INDUSTRIAL

LEGAL DESCRIPTION

REFER TO CIVIL

REFERENCE FOR THE FULL LEGAL DESCRIPTION FOR CONCEPTUAL GRADING PLAN SHEET 1 OF 9

TR 1 ; THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

LOTS IN BLOCK 3 OF RIVERSIDE TRACT, IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 14, PAGE 668 OF MAPS, RECORD OF SAN DIEGO COUNTY.

TR 2 ; THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCEL A: THE NORTH OF ONE HALF OF LOT 1 IN BLOCK 3 OF RIVERSIDE TRACT, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AS SHOWN BY MAP ON FILE IN BOOK 14, PAGE 668 OF MAPS, RECORDS OF SAN DIEGO COUNTY, CALIFORNIA.

PARCEL B: LOT 2 OF BLOCK 3 OF RIVERSIDE TRACT, AS SHOWN BY MAP ON FILE IN BOOK 14 PAGE 668 OF MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.

TR 3 ; REAL PROPERTY IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

LOT 1 IN BLOCK 3 OF RIVERSIDE TRACT, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AS SHOWN BY MAP ON FILE IN BOOK 14, PAGE(S) 668, OF MAPS, RECORDS OF SAN DIEGO COUNTY, CALIFORNIA, EXCEPTING THAT PORTION LYING SOUTH OF THE FOLLOWING DESCRIBED LINE :

BEGINNING AT THE INTERSECTION OF THE SOUTH LINE OF SAID SECTION 31 AND THE EAST LINE OF WEBSTER AVENUE AS SHOWN BY RECORD OF SURVEY ON FILE IN BOOK 64, PAGE 54, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA

TR 4 ; LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF PERRIS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

THE SOUTH ½ OF LOT 1 IN BLOCK 3 OF RIVERSIDE TRACT, AS SHOWN BY MAP ON FILE IN BOOK 14, PAGE 668 OF MAPS, RECORDS OF SAN DIEGO COUNTY, EXCEPT THAT PORTION DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHEAST CORNER OF SAID LOT 1, SAID SOUTHEAST CORNER BEING A POINT ON THE WEST LINE OF INDIAN AVENUE, 60.00 FEET WIDE;

ALBERT A. WEBB ASSOCIATES

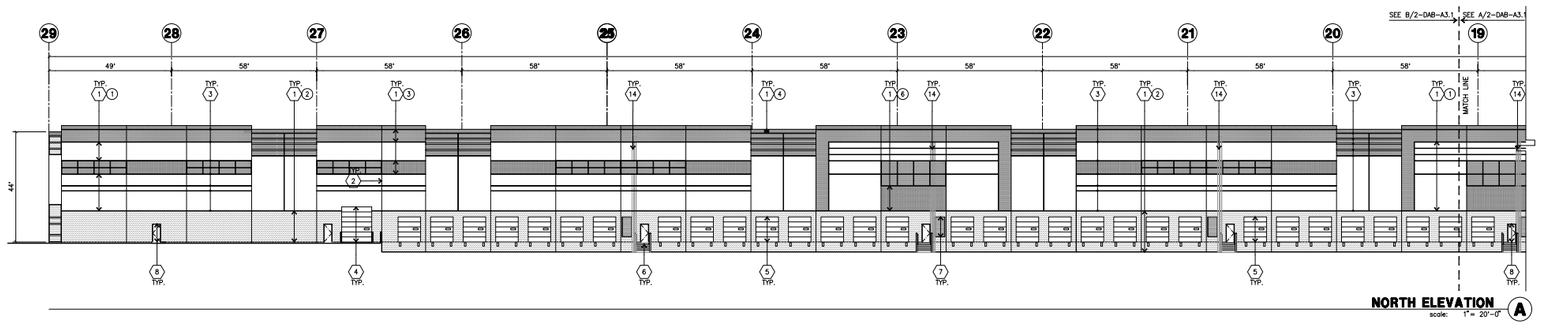
NTS

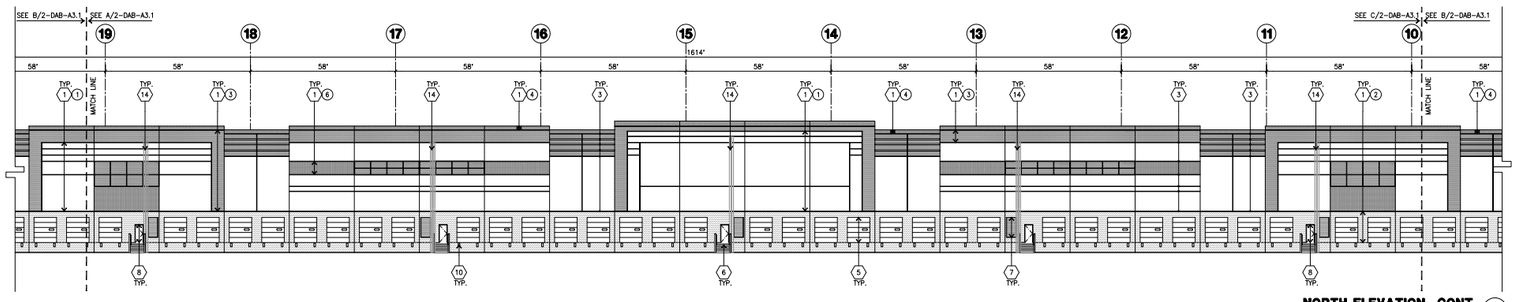
Sources: First Industrial Realty Trust, Inc., HPA Architecture, and Thienes Engineering, Inc., Mar. 20, 2023

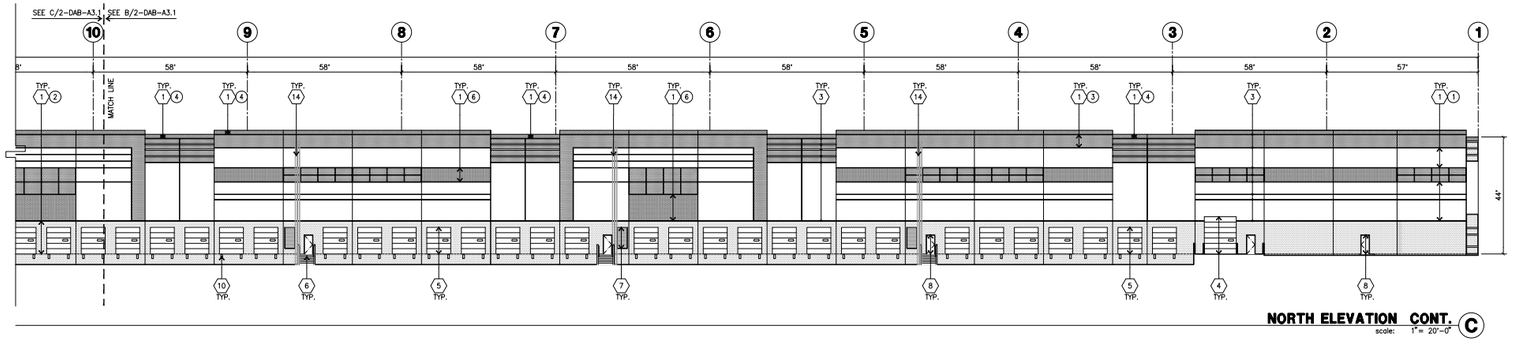
FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 3.0-10-A

Building Elevations







KEYNOTES - ELEVATIONS

1. CONCRETE TILT-UP PANEL(PAINTED). FINISH GRADE VARIES. SEE "C" DRAWINGS. WATERPROOF ALL WALLS WHERE GRADE IS HIGHER AND EXPOSED TO THE WEATHER ONE SIDE. WATERPROOFING TO BE PROTECTED WITH PROTECTION BOARD AND A MIN. OF 6" OF GRAVEL. PROVIDE TRENCH DRAIN AT BOTTOM AND DAYLIGHT TO CURB OR TAKE TO STORM DRAIN. NOT REQUIRED AT DOCK HIGH CONDITION OR AT RAMP WALLS.
2. PANEL JOINT.
3. PANEL REVEAL. ALL REVEALS TO HAVE A MAX. OF 3/8" CHAMFER. REVEAL COLOR TO MATCH ADJACENT BUILDING FIELD COLOR. U.N.O.
4. OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
5. OVERHEAD DOOR @ DOCK HIGH. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
6. CONCRETE STAIR, LANDING AND GUARDRAIL W/ METAL PIPE HANDRAIL. PROVIDE NON SKID NOSING TO MEET ADA REQUIREMENTS. PROVIDE CONTRASTING COLORED 3" WIDE WARNING STRIPE INTEGRAL TO CONCRETE AT TOP LANDING AND BOTTOM TREAD PER ADA REQUIREMENTS.
7. METAL LOUVER. PAINT COLOR TO MATCH FIELD COLOR.
8. HOLLOW METAL DOORS. PROVIDE COMPLETE WEATHER STRIPING ALL AROUND DOOR. PROVIDE FOR RAIN DIVERTER ABOVE DOOR.
9. ROOF LINE BEYOND.
10. DOCK BUMPER
11. ALUMINUM STOREFRONT FRAMING WITH TEMPERED GLAZING AT ALL DOORS, SIDELITES ADJACENT TO DOORS AND GLAZING WITH BOTTOMS LESS THAN 18" ABOVE FINISH FLOOR ELEVATION.
12. PARAPET RETURN
13. TUBE STEEL CANOPY
14. INTERIOR ROOF DRAIN WITH OVERFLOW DRAIN
15. INTERIOR ROOF DRAIN WITH OVERFLOW SCUPPERS
16. NOT USED

GENERAL NOTES - ELEVATIONS

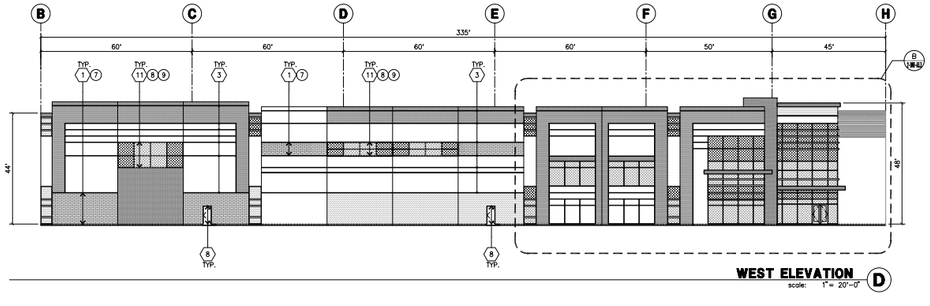
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G. BACK SIDE OF PARAPETS TO HAVE SMOOTH FINISH AND BE PAINTED WITH ELASTOMERIC PAINT.
H. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH.
J. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
K. THE FIRST COAT OF PAINT TO BE ROLLED-ON AND THE SECOND COAT TO BE SPRAYED-ON

COLOR SCHED. - ELEVATIONS

1. CONCRETE TILT-UP PANEL PAINT BRAND SHERWIN-WILLIAMS SW7005 PURE WHITE
2. CONCRETE TILT-UP PANEL PAINT BRAND SHERWIN-WILLIAMS SW7071 GRAY SCREEN
3. CONCRETE TILT-UP PANEL PAINT BRAND SHERWIN-WILLIAMS SW7073 NETWORK GRAY
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7. SPLIT LIMESTONE - BLACK FOREST CORONADO STONE
8. MULLIONS — COLOR CLEAR ANODIZED
9. GLAZING — COLOR BLUE REFLECTIVE GLAZING
10. METAL CANOPY — COLOR SW ACRYLIC LATEX SYSTEMS HIGH GLOSS /HIGH PERFORMANCE 7075 WEB GRAY

GLAZING LEGEND

- TEMPERED SPANDREL GLASS
- TEMPERED VISION GLASS
- TEMPERED VISION INSULATED GLASS PPG: VISTACOOL (2) PACIFICA + SOLARBAN SOLARBAN 60 (3) CLEAR U VALUE: 0.27, SHGC: 0.21 AND VLT: 26% 1" INSULATED GLASS WITH 1/2" AIRSPACE AND (2) 1/4" LITES.



NTS

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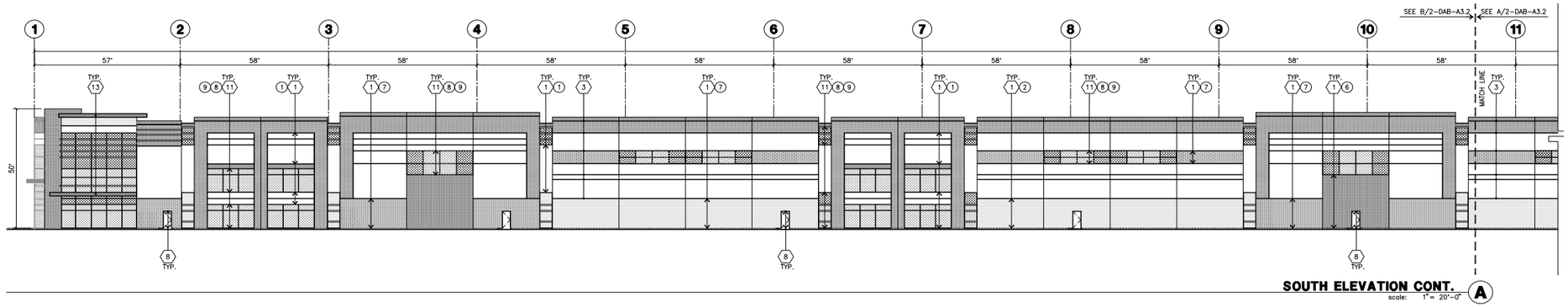
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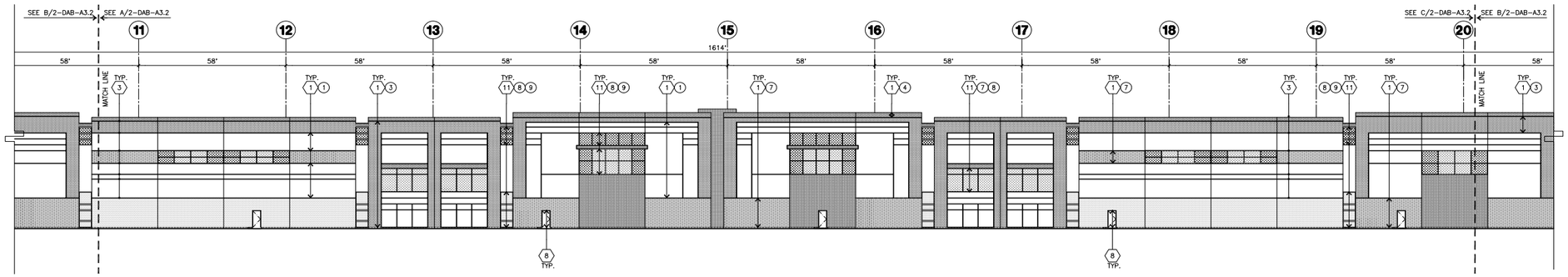
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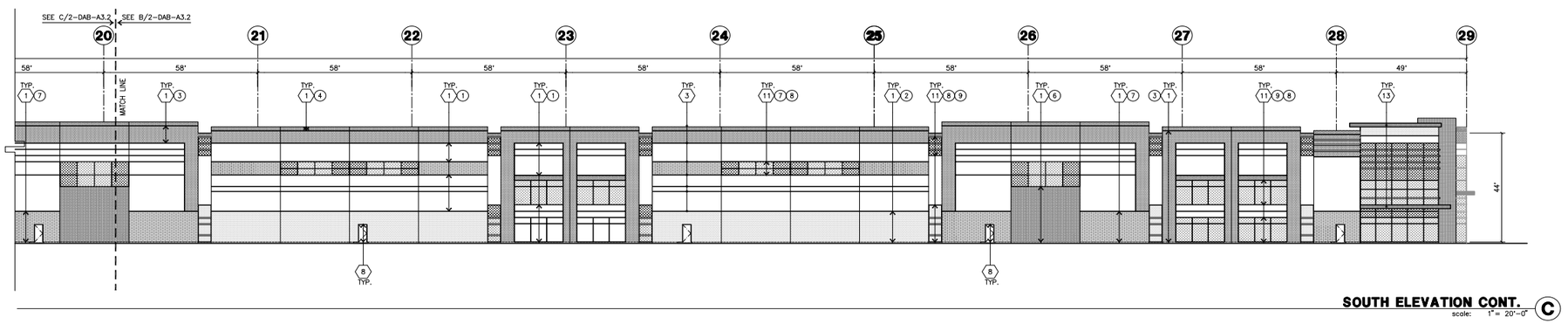
FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 3.0-10-B

Building Elevations







KEYNOTES - ELEVATIONS

1. CONCRETE TILT-UP PANEL(PAINTED). FINISH GRADE VARIES. SEE "C" DRAWINGS. WATERPROOF ALL WALLS WHERE GRADE IS HIGHER AND EXPOSED TO THE WEATHER ONE SIDE. WATERPROOFING TO BE PROTECTED WITH PROTECTION BOARD AND A MIN. OF 6" OF GRAVEL. PROVIDE TRENCH DRAIN AT BOTTOM AND DAYLIGHT TO CURB OR TAKE TO STORM DRAIN. NOT REQUIRED AT DOCK HIGH CONDITION OR AT RAMP WALLS.
2. PANEL JOINT.
3. PANEL REVEAL. ALL REVEALS TO HAVE A MAX. OF 3/8" CHAMFER. REVEAL COLOR TO MATCH ADJACENT BUILDING FIELD COLOR. U.N.O.
4. OVERHEAD DOOR @ DRIVE THRU. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND. PAINT COLOR TO MATCH FIELD COLOR.
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7. METAL LOUVER. PAINT COLOR TO MATCH FIELD COLOR.
8. HOLLOW METAL DOORS. PROVIDE COMPLETE WEATHER STRIPING ALL AROUND DOOR. PROVIDE FOR RAIN DIVERTER ABOVE DOOR.
9. ROOF LINE BEYOND.
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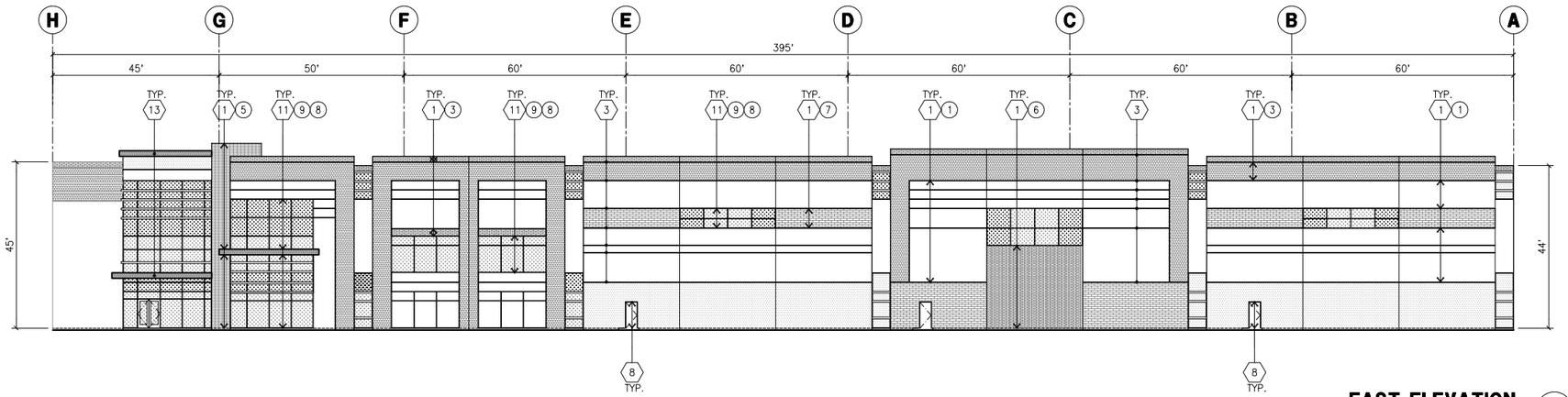
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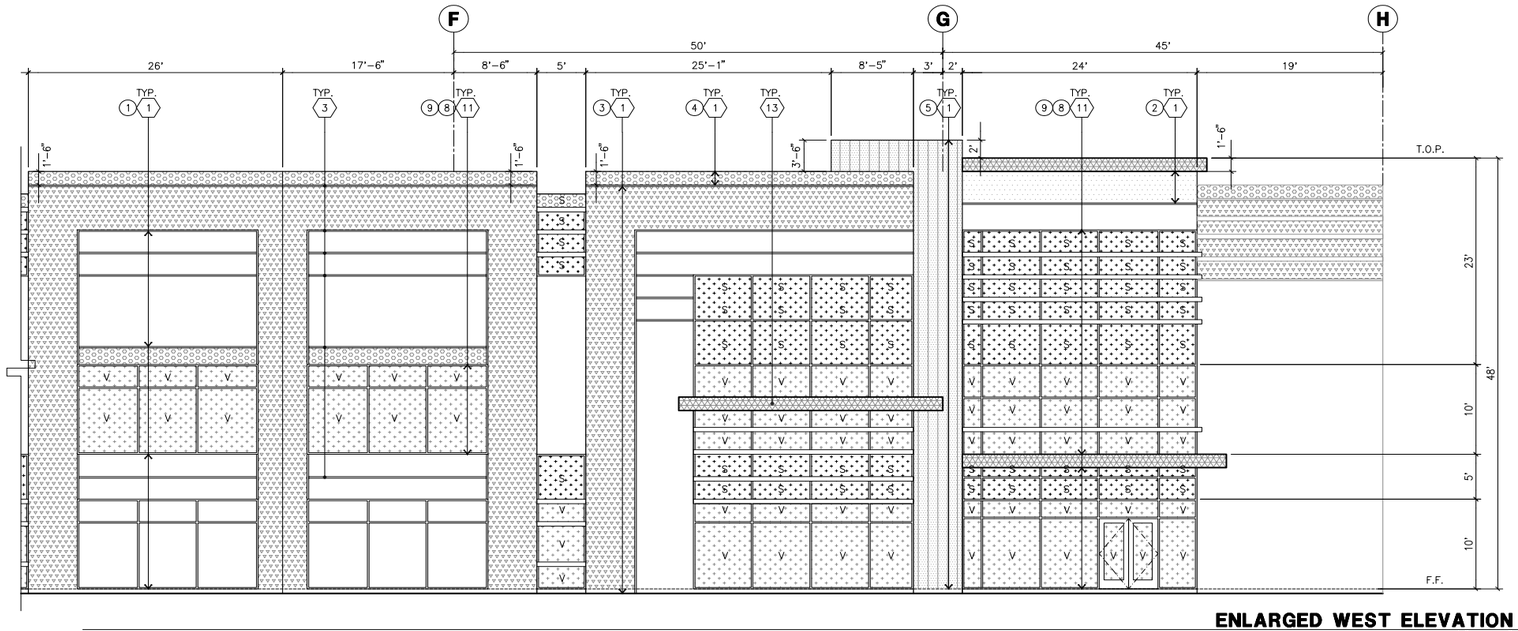
FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 3.0-10-C

Building Elevations



EAST ELEVATION A
scale: 1" = 20'-0"



ENLARGED WEST ELEVATION B
scale: 1/8" = 1'-0"

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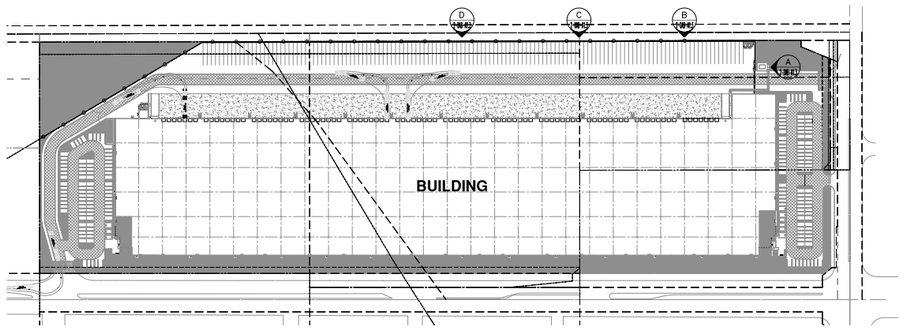
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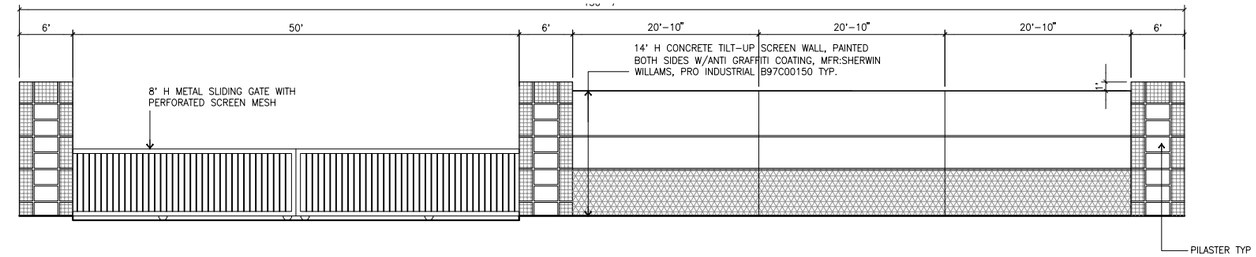
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FIGURE 3.0-11-A

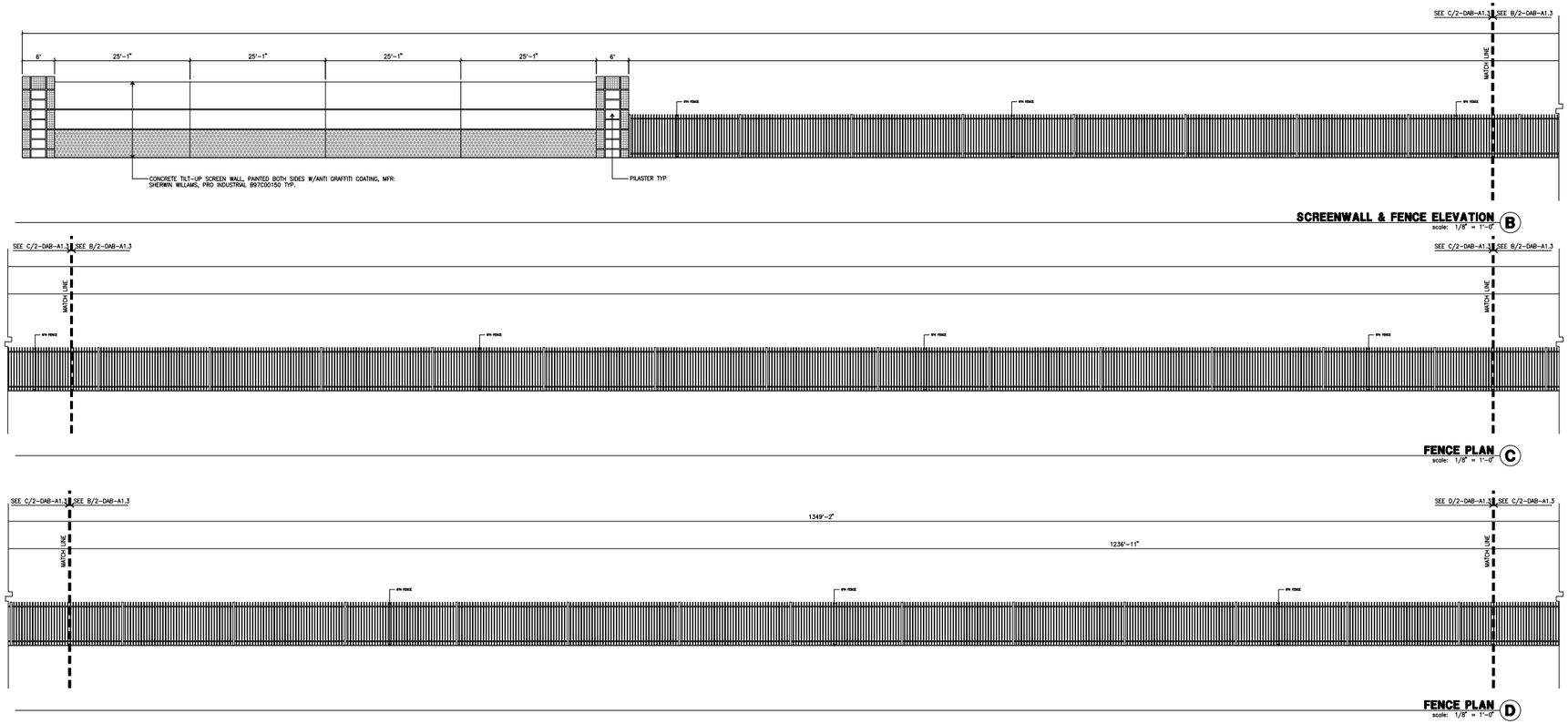
Screening Details

KEYMAP





SCREENWALL ELEVATION (A)
scale: 1/8" = 1'-0"



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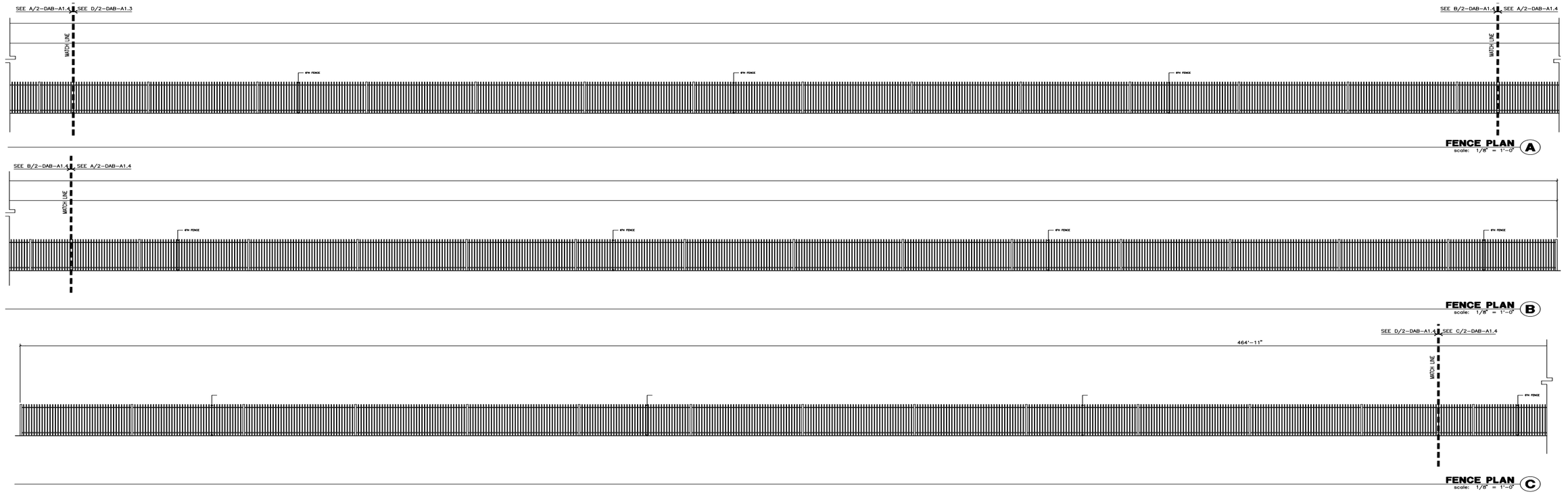
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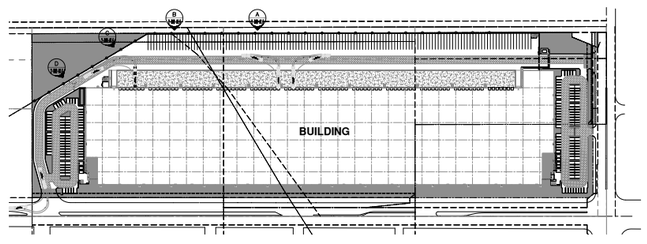
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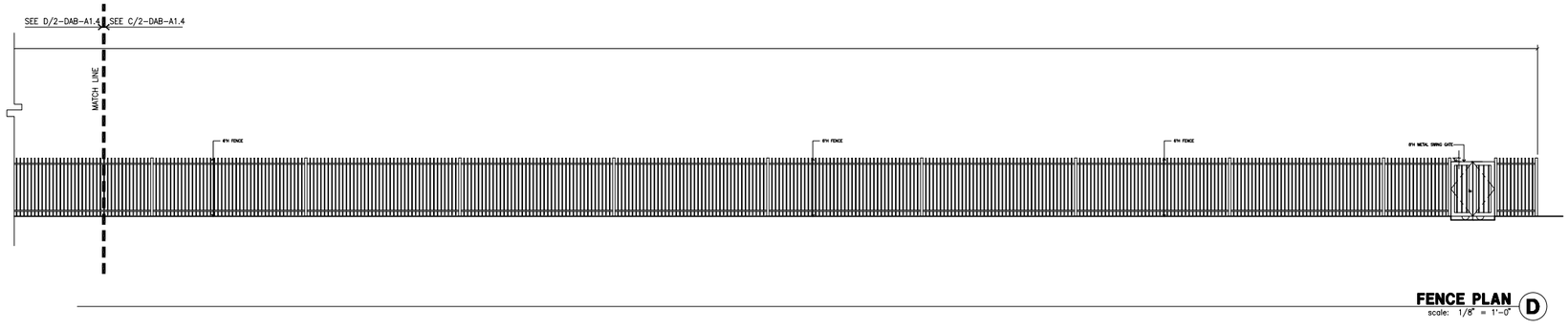
FIGURE 3.0-11-B

Screening Details



KEYMAP





NTS

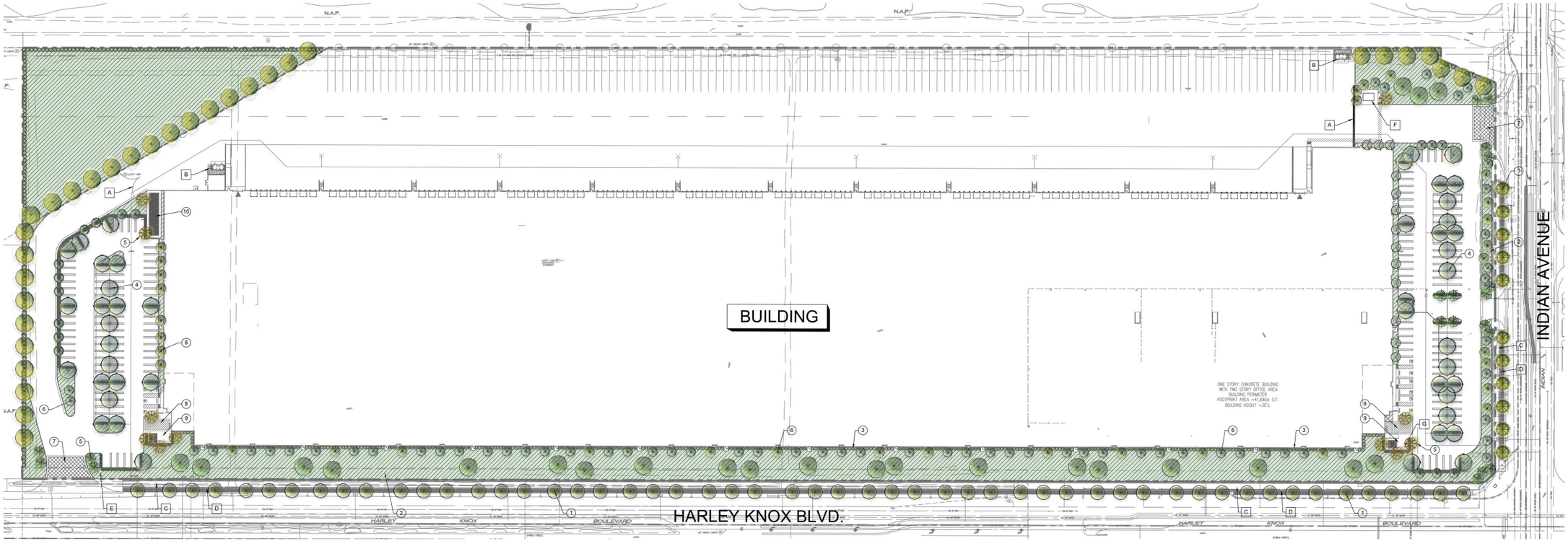
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FIGURE 3.0-12

Conceptual Landscape



PLANTING LEGEND

TREES

SYMBOL	TREE NAME	QTY.	WUCOLS
	PROPOSED STREET TREE ALONG HARLEY KNOX BLVD. PLATANUS RACEMOSA, CALIFORNIA SYCAMORE 24" BOX SIZE. STANDARD TRUNK	53	M
	PROPOSED STREET TREE ALONG INDIAN AVE. QUERCUS AGRIFOLIA, COAST LIVE OAK 36" BOX SIZE. STANDARD TRUNK	11	L
	OLEA E. 'WILSONII', FRUITLESS OLIVE TREE 36" BOX SIZE. STANDARD TRUNK.	23	L
	PARKING LOT SCREEN TREE QUERCUS ILEX, HOLLY OAK 24" BOX SIZE. STANDARD TRUNK.	44	L
	VERTICAL TREE ALONG BUILDING PINUS ELDARICA, MONDELL PINE 24" BOX SIZE. STANDARD TRUNK.	34	L
	FLOWERING ACCENT TREE AT PROJECT ENTRY LAGERSTROEMIA I. 'WATERMELON RED', CRAPE MYRTLE 24" BOX SIZE. STANDARD TRUNK.	19	M
	FLOWERING ACCENT TREE AT BUILDING CERCIDIUM F. 'DESERT MUSEUM', BLUE PALO VERDE 24" BOX SIZE	11	L
	PARKING LOT SCREEN TREE QUERCUS VIRGINIANA, SOUTHERN LIVE OAK 24" BOX SIZE. STANDARD TRUNK.	32	M
	VERTICAL SCREEN TREE AT BUILDING TRISTANIA CONFERTA, BRISBANE BOX 24" BOX SIZE	13	M
	VERTICAL SCREEN TREE PINUS ELDARICA, MONDELL PINE 24" BOX SIZE	78	L

GROUND COVERS

SYMBOL	NAME	WUCOLS
	ROSMARINUS O. 'PROSTRATUS', CREEPING ROSEMARY 1 GAL. SIZE @ 30" O.C	L
	LANTANA CAMARA 'DWARF GOLD', DWARF LANTANA 1 GAL. SIZE @ 30" O.C.	L
	MUHLENBERGIA RIGENS, DEER GRASS 1 GAL. SIZE @ 42" O.C.	M
	SALVIA CLEVLANDII, CLEVLAND SAGE 5 GAL. SIZE @ 48" O.C.	L
	DIANELLA TASMANICA 'VARIEGATA', WHITE STRIPED TASMAN FLAX LILY 1 GAL. SIZE @ 24" O.C.	M
	LONICERA J. 'HALLIANA', HALL'S HONEYSUCKLE 1 GAL. SIZE @ 24" O.C.	L
	CARISSA MACROCARPA 'GREEN CARPET', NATAL PLUM 1 GAL. SIZE @ 30" O.C.	M
	SALVIA LEUCANTHA, MEXICAN BUSH SAGE 5 GAL. SIZE @ 42" O.C.	L
	AGAVE 'BLUE FLAME', BLUE FLAME AGAVE 5 GAL. SIZE @ 36" O.C.	L
	LEYMUS C. 'CANYON PRINCE', CANYON PRINCE WILD RYE 1 GAL. SIZE @ 36" O.C.	L
	DIETES BICOLOR, FORTNIGHT LILY 1 GAL. SIZE @ 24" O.C	M
	VERBENA 'DE LA MINA', DE LA MINA VERBENA 1 GAL. SIZE @ 24" O.C.	L

NOTE: APPLY A 3" MIN. LAYER OF MULCH TOP DRESSING WITHIN ALL PLANTING AREAS. A SAMPLE IS REQUIRED PRIOR TO APPLICATION.

SHRUBS - SHRUBS SHALL BE CHOSEN FROM THE FOLLOWING:

SYMBOL	NAME	WUCOLS
	DODONAEA V. 'PURPUREA', PURPLE HOPSEED BUSH 5 GAL. SIZE	L
	WESTRINGIA FRUTICOSA, COAST ROSEMARY 5 GAL. SIZE	L
	LIGUSTRUM TEXANUM, TEXAS PRIVET 5 GAL. SIZE	L
	LEUCOPHYLLUM FRUTESCENS, TEXAS RANGER 5 GAL. SIZE	L
	CALLISTEMON 'LITTLE JOHN', DWARF BOTTLE BRUSH 5 GAL. SIZE	L

DESIGN KEY NOTES:

1. STREET TREE PER PLANTING LEGEND.
2. TYP. LAYERED ACCENT PLANTING ALONG STREET FRONTAGE (LOW-GROWING).
3. FOUNDATION SHRUB ALONG BUILDING PER PLANTING LEGEND.
4. EVERGREEN PARKING LOT CANOPY TREE (LOW-LITTER TYPE).
5. FLOWERING ACCENT PLANT AT FOCAL AREAS PER PLANTING LEGEND.
6. VERTICAL SCREEN TREE PER PLANTING LEGEND.
7. ENHANCED VEHICULAR PAVING AT DRIVEWAY AREAS. INTEGRAL COLORED CONCRETE WITH MEDIUM ETCH FINISH.
8. ENHANCED ENTRY PAVING. INTEGRAL COLORED CONCRETE.
9. OUTDOOR SEATING AREA CONSISTING OF INTEGRAL COLOR CONCRETE AND SITE FURNITURE.
10. EMPLOYEE BREAK AREA WITH BALL COURT.

REFERENCE NOTES:

- A GATE PER ARCH. PLANS.
- B TRASH ENCLOSURE PER ARCH. PLANS.
- C ALL PURPOSE TRAIL PER CIVIL PLANS.
- D DECOMPOSED GRANITE.
- E SIGNAGE PER ARCH. PLANS.
- F GUARDHOUSE PER ARCH. PLANS.
- G BIKE RACK PER ARCH. PLANS.

CONCEPTUAL PLAN NOTE:

THIS IS A CONCEPTUAL LANDSCAPE PLAN. IT IS BASED ON PRELIMINARY INFORMATION WHICH IS NOT FULLY VERIFIED AND MAY BE INCOMPLETE. IT IS MEANT AS A COMPARATIVE AID IN EXAMINING ALTERNATE DEVELOPMENT STRATEGIES AND ANY QUANTITIES INDICATED ARE SUBJECT TO REVISION AS MORE RELIABLE INFORMATION BECOMES AVAILABLE.

IRRIGATION NOTE:

THE PROJECT WILL BE EQUIPPED WITH A LOW FLOW IRRIGATION SYSTEM CONSISTING OF ET WEATHER BASED SMART CONTROLLER, LOW FLOW ROTORS, BUBBLER AND/ OR DRIP SYSTEMS USED THROUGHOUT. THE IRRIGATION WATER EFFICIENCY WILL MEET OR SURPASS THE CURRENT STATED MANDATED AB-1881 WATER ORDINANCE.

GENERAL NOTES:

- ROCK RIP-RAP MATERIAL SHALL BE INSTALLED WHERE DRAIN LINES CONNECT TO INFILTRATION AREAS.
- ALL UTILITY EQUIPMENT SUCH AS BACKFLOW UNITS, FIRE DETECTOR CHECKS AND FIRE CHECK VALVES WILL BE SCREENED WITH EVERGREEN PLANT MATERIAL ONCE FINAL LOCATIONS HAVE BEEN DETERMINED.

LANDSCAPE DATA

TOTAL SITE AREA = 320,750 SQ. FT. (7.36 ACRES)
LANDSCAPE AREA REQUIRED = 11,298 SQ. FT. (15%)
LANDSCAPE AREA PROVIDED = 39,319 SQ. FT. (52.2%)

WUCOLS PLANT FACTOR

THIS PROJECT IS LOCATED IN 'WUCOLS' REGION '4-SOUTH INLAND VALLEY".

H = HIGH WATER NEEDS
M = MODERATE WATER NEEDS
L = LOW WATER NEEDS
VL= VERY LOW WATER NEEDS

NTS

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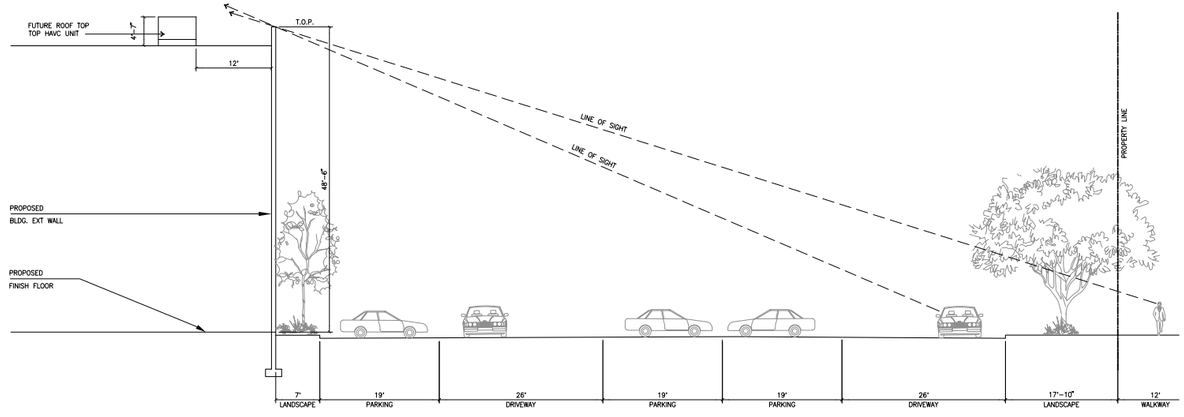
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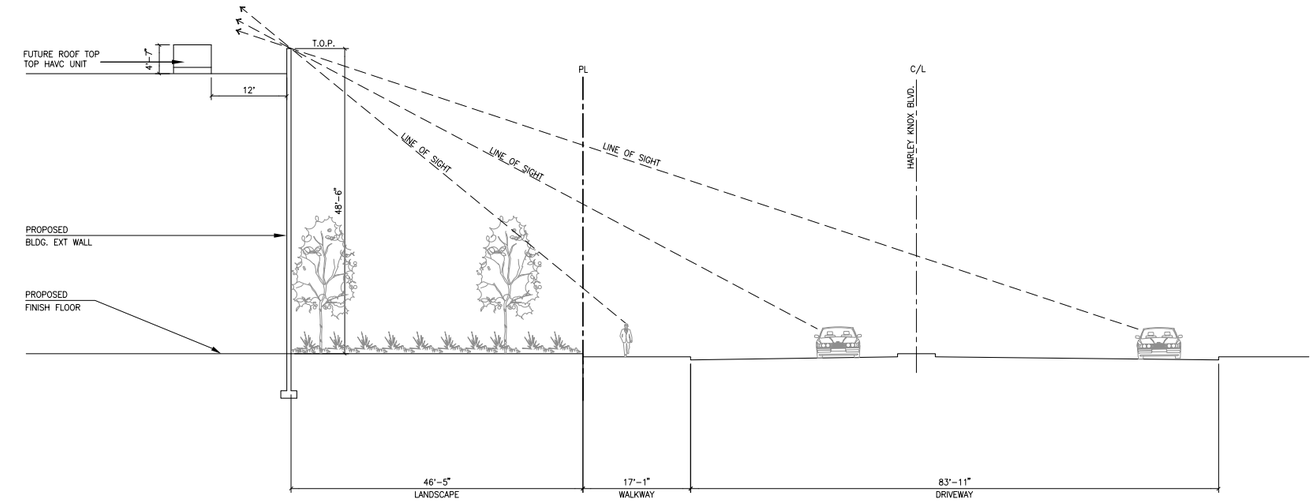
FIRST INDUSTRAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 3.0-13

Line of Sight



SITE SECTION STUDY A
scale: 1"= 10'-0"



SITE SECTION STUDY B
scale: 1"= 10'-0"

NTS

Sources: First Industrial Realty Trust, Inc., HPA Architecture, and Thienes Engineering, Inc., Mar. 20, 2023

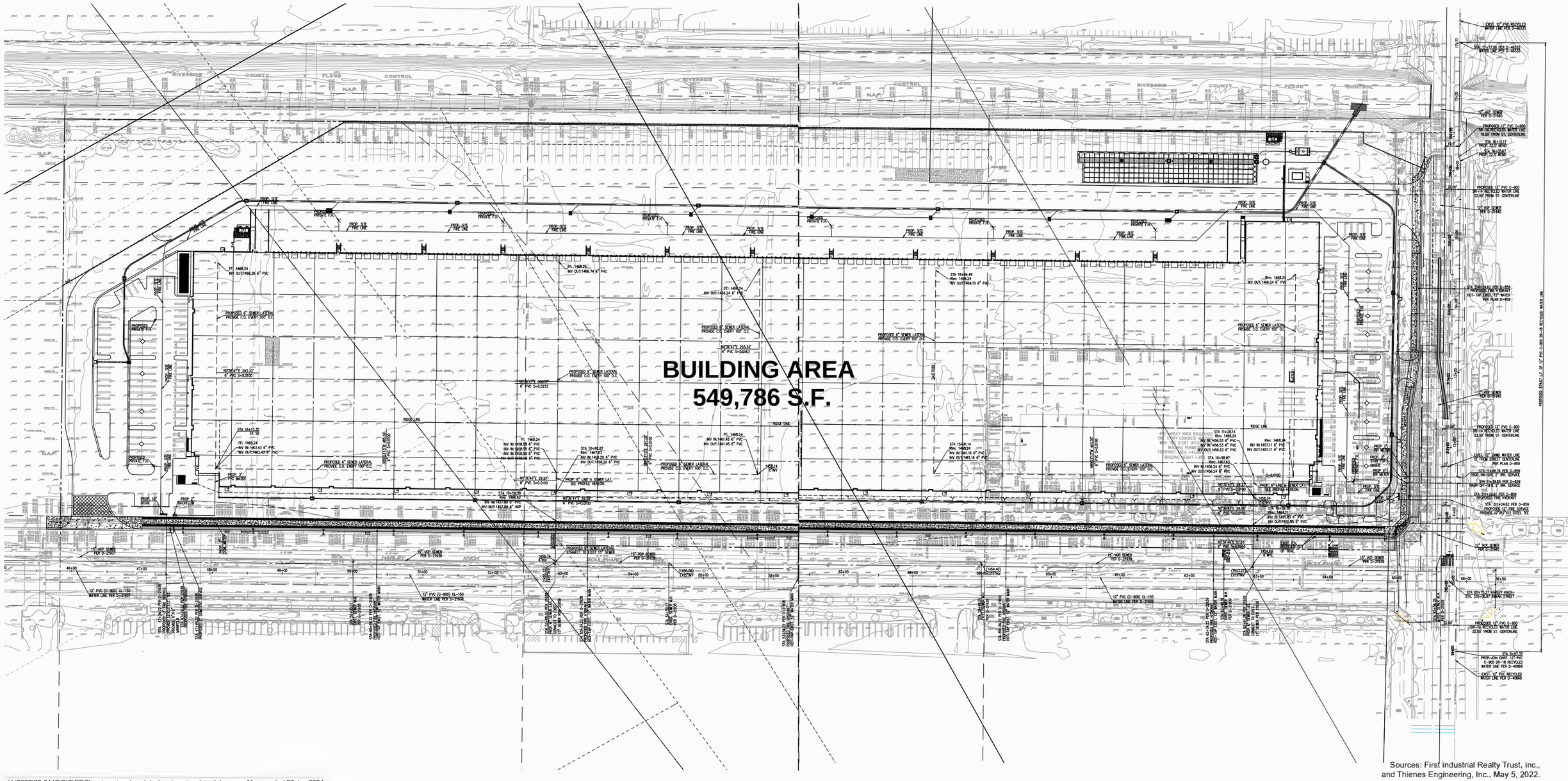
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FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 3.0-14

Existing and Proposed Utilities



Sources: First Industrial Realty Trust, Inc., and Thienes Engineering, Inc., May 5, 2022.

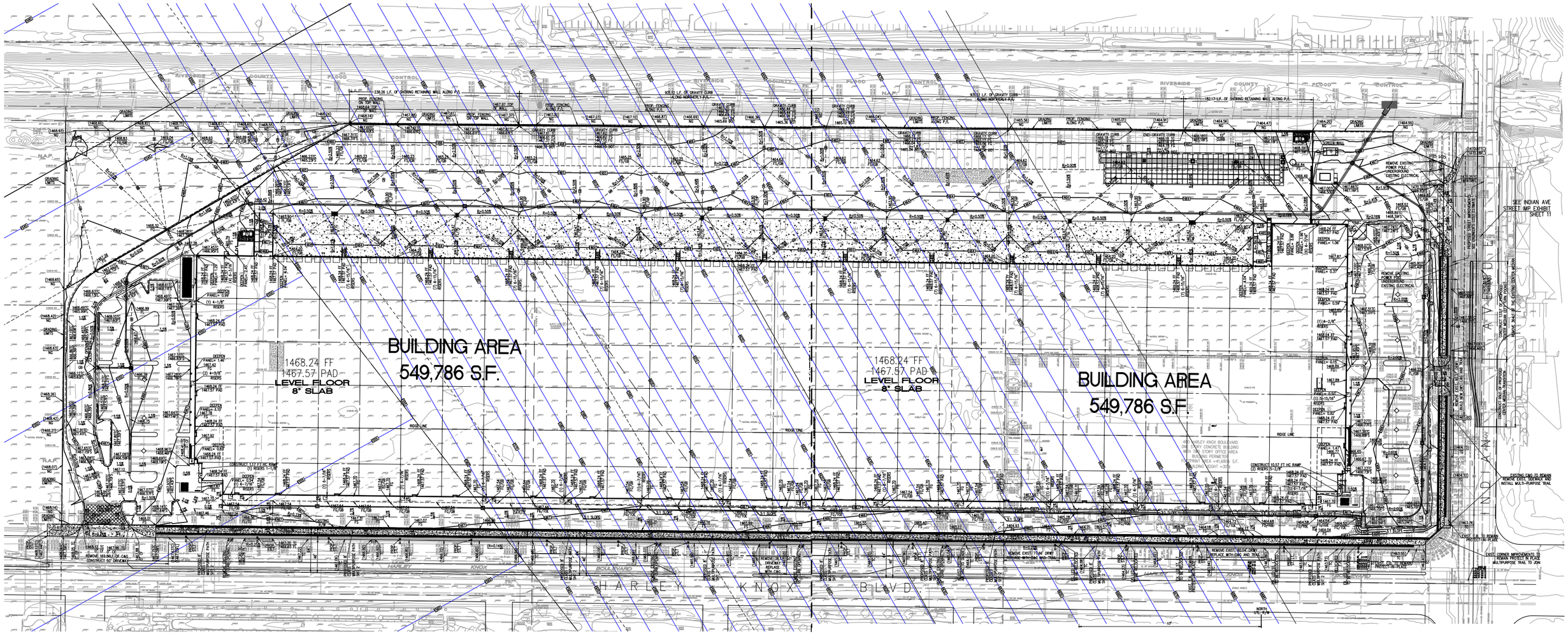
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FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 3.0-15

Grading Plan



3/16/2023

EARTHWORK BALANCE CALCULATIONS

PROJECT: First Industrial Harley Knox
JOB# 4066 - Option A

K.	SITE AREA:	1,089,873	SF
L.	SUBSIDENCE FACTOR:	0.13	FT
M.	SHRINKAGE FACTOR:	10.0	%
N.	SITE STRIPPING FACTOR:	0.04	
O.	OVEREXCAVATION:	94,550	CY
A.	CALCULATED CUT:	37,898	CY
B.	FOOTING AND ONSITE UTILITY SPOILS	7,837	CY
Ba	OFFSITE SPOILS (STREET AND UTILITIES)	-	
C.	**TOTAL CUT: (A+B)**	45,735	CY
D.	CALCULATED FILL:	24,958	CY
E.	LIGHT PAVING FILL:	-	CY
F.	SUBSIDENCE: (L*K/27)=	5,069	CY
G.	SHRINKAGE: (M/100)C=	4,594	CY
H.	SITE STRIPPING	1,615	
I.	OVEREXCAVATION SHRINKAGE	9,488	CY
J.	**TOTAL FILL: (D+E+F+G+H)=**	45,735	CY
Q.	**TOTAL (IMPORT) OR EXPORT:**	(0)	CY
	SITE ADJUSTMENT	(0.00)	

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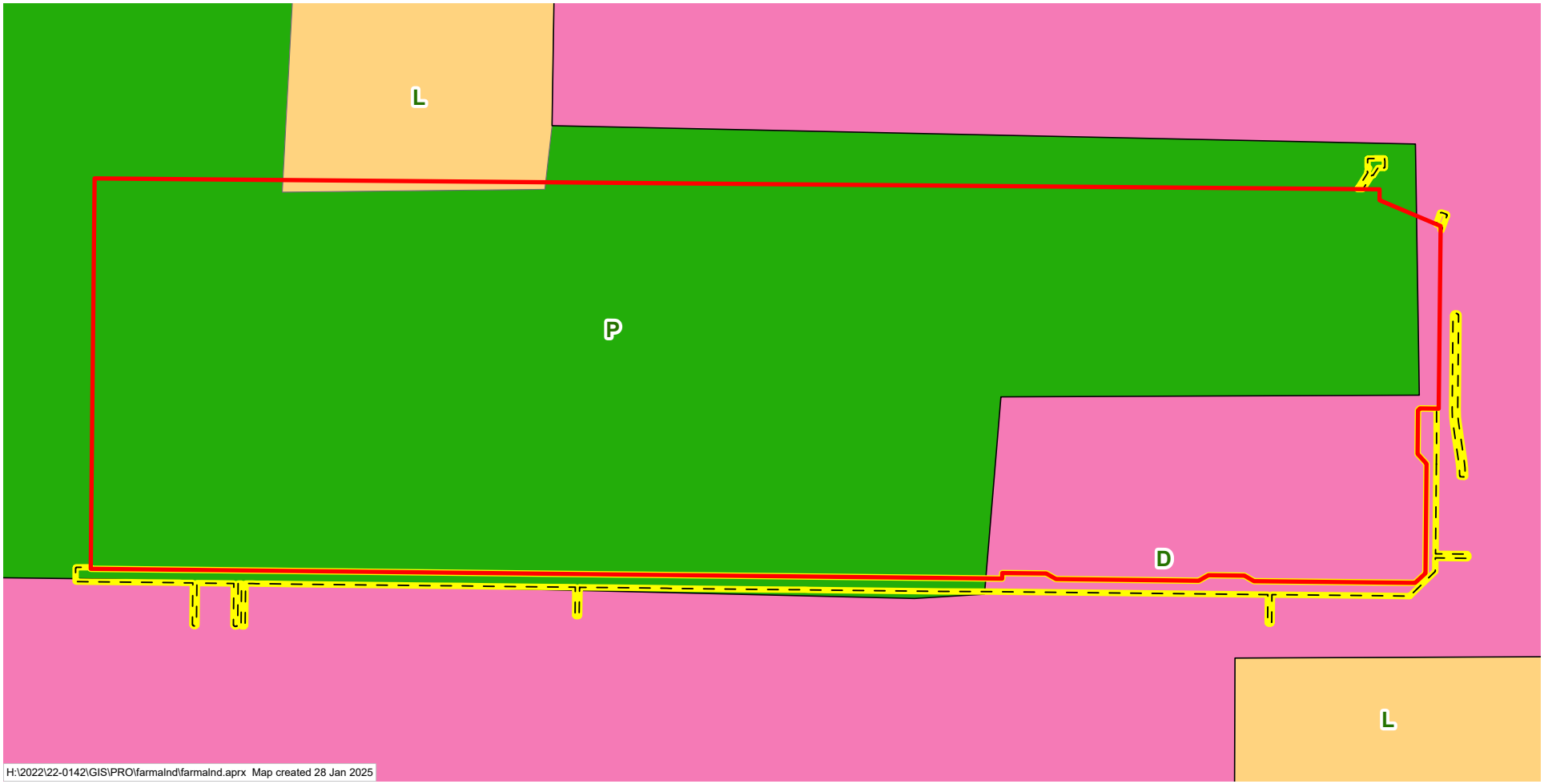
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Sources: First Industrial Realty Trust, Inc., HPA Architecture, and Thienes Engineering, Inc., Mar. 20, 2023

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FIGURE 3.0-16

Farmland Map



LEGEND

- Project Boundary
- Offsite Disturbance Footprint
- L - Farmland of Local Importance
- D - Urban and Built Up Land

Designations

- P - Prime Farmland

0 115 230 Feet

Sources: California Department of Conservation, Farmland Mapping and Monitoring Program, 2020.

ALBERT A. WEBB ASSOCIATES

3.4 Sustainability Features

The Project would meet or exceed all applicable standards under the CALGreen) Code and the Building Energy Efficiency Standards contained in Title 24 in effect at the time that the building permits are issued. The Project is proposed to implement concepts of efficient design and material use that are consistent with Silver LEED Certification Levels. This would be accomplished by incorporating, at a minimum, the following sustainability features or other features that are equally efficient:

Energy Efficiency

- Design building shells and components, such as windows, roof systems and electrical systems to meet California Title 24 Standards for nonresidential buildings.

- Design buildings to achieve U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) features for potential certification. This includes design considerations related to the building envelope, heating, ventilation, and air conditioning (HVAC), lighting, and power systems. Additionally, architectural expressions, such as roofs and windows in the buildings would relate to conserving energy.

- Install energy efficient light-emitting diodes (LED) lighting on the site. Provide skylights for natural daylight to reduce the lighting load, therefore saving energy. Lighting would incorporate motion sensors that turn them off when not in use.

- Meet City minimum landscape requirements and provide adequate landscape shade for the site to reduce energy use.

- Install light-colored roofing materials over office area spaces and light-colored paving materials.

- For future office space, install energy efficient HVAC systems (seasonal energy efficiency ratio (SEER) 13), appliances and equipment, and control systems that are Energy Star rated.

- For future office improvement, refrigerants and HVAC equipment would be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global climate change. Ventilation and HVAC systems would be designed to meet or exceed the minimum outdoor air ventilation rates described in the American Society of Heating, Refrigeration, and Air Conditioning Engineers standards and/or per California Title 24 requirements.

- Incorporate Energy Star rated space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.

Water Conservation and Efficiency

- Surface parking lots would be landscaped in accordance with City standards to reduce heat island effect.

- Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls and sensors for landscaping according to the California Department of Water Resources Model Efficient Landscape Ordinance and Chapter 19.70 (Landscaping) of the Perris Municipal Code.

- Design buildings to be water efficient. Install water-efficient fixtures in accordance with Section 5.303 of the California Green Building Standards Code Part 11.

- Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff in accordance with City Standards.

- Provide education about water conservation and available programs and incentives to the building operators to distribute to employees.

Solid Waste Measures

- Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1 of the California Green Building Standards Code Part 11.

- Provide storage areas for recyclables and green waste and adequate recycling containers located in readily accessible areas in accordance with Section 5.410.1 of the California Green Building Standards Code Part 11.

- The property operator would provide readily available information provided by the City for employee education about reducing waste and available recycling services.

Transportation and Motor Vehicles

- Limit idling time for commercial vehicles to no more than five minutes per Title 13 of the California Code of Regulations, Section 2485.

- Provide electric vehicle (EV) infrastructure and facilitate EV charging in accordance with Section 5.106.5.3, Electric Vehicle Charging Requirements, of the California Green Building Standards Code Part 11. Accordingly, the Project would provide a minimum of 35 EV-capable parking spaces and at least 12 of these spaces would be equipped with EV charging stations at Project opening.[1]

- Signage shall be posted onsite directing truck drivers to use existing City truck routes on Harley Knox Boulevard.

- Provide Class II bike lanes on Harley Knox Boulevard, within the Project's frontage, per the City's Active Transportation Plan.

- Provide adequate bicycle parking near building entrances to promote cyclist safety, security, and convenience in compliance with Section 5.106.4 of the California Green Building Standards Code Part 11 and standard City code requirements.

[1] These numbers are based on the current requirements of Section 5.106.5.3.1 of the 2022 California Green Building Standards (CALGreen) Code, Title 24, Part 11. The 2025 CALGreen Code takes effect on January 1, 2026 and the Project would need to provide at least 18 spaces with EV chargers at the time of opening if its building permits are approved after 2025.

Onsite Equipment and Loading Docks

- The Project owner would inform building operators of existing requirements to turn off equipment, including heavy-duty equipment, motor vehicles, and portable equipment, when not in use for more than 5 minutes. Truck idling shall not exceed 5 minutes in time. All facilities would post signs (both interior and exterior facing signs, including signs directed at all dock and delivery areas) requiring that trucks shall not be left idling for more than 5 minutes pursuant to Title 13 of the California Code of Regulations, Section 2485, which limits idle times to not more than five minutes and to report violations to California Air Resources Board, the South Coast AQMD, and the building manager.

- Service equipment (i.e., yard trucks and forklifts) used within the site shall be electric with the necessary electrical charging stations provided or powered by alternative technology.

Construction

- Require Construction Equipment to Turn Off When Not in Use per Title 13 of the California Code of Regulations, Section 2449.

- Use regionally produced and/or manufactured building materials, where feasible, for Project construction.

- Use "green" building materials where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way.

3.5 Project Objectives

Per CEQA Guidelines Section 15124 (b), an EIR needs to include a statement of the objectives of a project which helps the City develop a reasonable range of alternatives. The objectives need to outline the general purpose of the project. The purpose of the proposed Project is to construct and operate a high-cube, warehouse building. The Project objectives as identified by the Project applicant are as follows:

- Develop and operate a logistics center on an underutilized site that leverages the existing City infrastructure and is adjacent to similar industrial logistics and distribution center uses.
- Develop and operate a logistics center on an underutilized site that capitalizes the Project site's visibility from I-215 that will attract high-quality tenants and will be competitive with other similar facilities in the region.
- Develop a strategically located logistics center in close proximity to March ARB/IPA, I-215/SR-60, and I-10, to support the distribution of goods throughout the region that limits traffic truck disruption to residential areas within the City and neighboring jurisdictions.
- Enhance regional freight efficiency by positioning the logistics center within proximity to the Ports of Los Angeles and Long Beach, enabling trucks servicing the site to achieve a minimum of two roundtrips per day.
- Design and operate a logistics center that is Silver LEED Certified and meets industry standards for logistics operations and site functionality.
- Support the City's economic growth through capital investment, job creation—including roles for highly skilled workers—and expansion of the local tax base that would further the City's near tern and long-rage fiscal goals.

- Implement the PVCCSP through development of an underutilized site with a land use allowed by the Industrial land use designation and consistent with the PVCCSP development standards and criteria relevant to the site and proposed use.
- Create local job opportunities for residents to improve the City's jobs-housing balance.
- Establish new development that would further the City's near-term and long-range fiscal goals.

3.6 Discretionary Actions and Approvals

The following approvals and permits are required from the City to implement the proposed Project:

- Certification of an EIR with the determination that the EIR has been prepared in compliance with the requirements of CEQA;
- Tentative Parcel Map (TPM) 38684: Consolidate the existing seven (7) parcels into one parcel and dedicate portions of the Project site to Harley Knox Boulevard and Indian Avenue Road right-of-way; and
- Development Plan Review (DPR) 22-00016: Develop an approximately 25.1-gross-acre site with an approximately 549,786-square-foot industrial high-cube non-refrigerated speculative warehouse distribution building per **Figure 3.0-9 – Site Plan**. In addition to the 25.1-acre site, up to 1.1 additional acres of potential offsite improvements may be necessary.

Other non-discretionary actions anticipated to be taken by the City at the staff level as part of the proposed Project include:

- Review and approval of all infrastructure plans, including street and utility improvements pursuant to the conditions of approval;
- Review all on and offsite plans, including grading and on and offsite utilities; and
- Approval of a preliminary Water Quality Management Plan (WQMP) to mitigate post-construction runoff flows.

Approvals and permits that may be required by other agencies include:

- Santa Ana Regional Water Quality Control Board - NPDES permit to ensure that construction site drainage velocities are equal to or less than the pre-construction conditions and downstream water quality is not worsened and Waste Discharge Permit for storm drain connections to the Perris Valley Storm Drain;
- South Coast Air Quality Management District – Compliance with the Indirect Source Rule (Rule 2305) for warehouse owners and operators and a permit to install and operate a diesel fueled fire water pump;
- Eastern Municipal Water District – Approval of water and sewer improvement plans;
- Other utility agencies - Permits or associated approval as necessary, for installation of new utility infrastructure or connections to existing facilities;

- Riverside County Flood Control and Water Conservation District - Encroachment permit for construction of Line A to discharge into the Perris Valley Storm Drain, Lateral B;

- California Department of Fish and Wildlife - Section 1602 Lake and Streambed Alteration Agreement for the storm drain connections to the Perris Valley Storm Drain.

4.0 Environmental Effects Found Not to be Significant

CEQA provides that a Draft EIR shall focus on all potentially significant effects created by the proposed Project onto the environment, discussing the effects with emphasis in proportion to their severity and probability of occurrence. Effects determined in an Initial Study as being less than significant or less than significant with mitigation incorporated need not be discussed further in a Draft EIR unless information inconsistent with the finding in the Initial Study is subsequently received.

4.1 Effects Found Not to be Significant during Preparation of the Initial Study and Notice of Preparation

Section 21100(c) of the Public Resources Code states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Section 15128 of the CEQA Guidelines adds, "Such a statement may be contained in an attached copy of an Initial Study."

The Initial Study prepared for the proposed First Industrial Logistics at Harley Knox and Indian Project (Project), included as Appendix A of this Draft EIR, concluded that the proposed Project would not result in significant impacts to the following topics or portions of those topics as described below. The specific thresholds listed are not discussed further within the body of this Draft EIR. The following is a summary of the discussions from the Initial Study.

4.1.1 Aesthetic Resources

The following environmental topics related to aesthetics were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the preparation of the Initial Study. Therefore, the following topics will not be addressed further in this Draft EIR.

Substantially Adverse Effect a Scenic Vista

The proposed Project site is located within the Perris Valley and the terrain is generally flat. The Project site itself is not a scenic vista, nor does it currently block or diminish a scenic vista. The surrounding roadway network has been established and therefore is preserving the view corridors. Thus, implementation of the Project would not have a substantial adverse effect on a scenic vista. Therefore, potential impacts would be **less than significant**. (Initial Study, p. 42.)

Substantially Damage Scenic Resources within a State Scenic Highway

According to the PVCCSP EIR, there are no specific scenic resources such as trees, rock outcroppings, or unique features within the PVCCSP area. The Project site is not located within view of a State Scenic Highway, construction and operation of the proposed Project would not substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. **No impact** would occur. (Initial Study, p. 42.)

Substantially Degrade the Existing Visual Character or Quality of Public Views of the Site and its Surroundings.

The proposed Project has been designed according to the Standards and Guidelines set forth in the PVCCSP to address visual character, including but not limited to: Chapter 4.0, On-site Design Standards and Guidelines; Chapter 6.0, Landscape Standards and Guidelines; Chapter 8.0, Industrial Design Standards and Guidelines. Further, existing land uses surrounding the proposed Project site include a

mixture of industrial buildings (warehouses), vacant land, and auto auction uses. Because design, construction, and operation of the proposed Project would not conflict with applicable zoning and other regulations governing scenic quality, potential impacts in this regard would be **less than significant**. (Initial Study, p. 42.)

Create a New Source of Substantial Light or Glare

The proposed warehouse building would not introduce substantial new daytime glare to the area because once constructed, the proposed warehouse structure would consist of a concrete tilt-up building with few windows which would be as non-reflective as possible to allow for interior natural light. Additionally, the Project site is located within Zone B of the Mt. Palomar Observatory, Project operational lighting would be required to comply with County Of Riverside Ordinance 655. All light sources would be shielded so that the light is directed away from streets and adjoining properties as required by City of Perris Municipal Code Section 19.020.110. However, nighttime lighting may be used within the construction staging areas to provide security for construction equipment. Due to the distance between the construction area and the adjacent existing residences and motorists on adjacent roadways, such security lights may result in glare to residents and motorists. This potential impact would be reduced to a less than significant level with implementation of Project-specific mitigation measure **MM AES 1**.

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

The Project would not create new sources of light or glare that would adversely affect day or nighttime views in the area. Therefore, potential impacts would be **less than significant with mitigation incorporated**. (Initial Study, pp. 42-43.)

4.1.2 Agricultural and Forestry Resources

The following environmental topics related to agricultural and forestry resources were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the preparation of the Initial Study. Therefore, the following topics will not be addressed further in this Draft EIR.

Conflict with Existing Zoning for Agricultural Use or a Williams Act Contract

The City's 1991 General Plan eliminated the agricultural land use designation from within City boundaries. Therefore, there are no agricultural zones identified by the City and the proposed Project site is not covered under a Williamson Act Contract (Perris GP EIR, p. VI-3). Therefore, implementation of the proposed Project would not conflict with an existing zoned agricultural use, or a Williamson Act Contract and **no impact** would occur. (Initial Study, pp. 45-46.)

Conflict with Existing Zoning or Cause Rezoning of Forest Land, Timberland, or Timberland Zoned for Timberland Production

The PVCCSP zoning designation for the Project site is General Industrial (GI). There is no existing or proposed zoning for forest land, timber land, or Timberland Production Zones within the City of Perris. Accordingly, there is no commercial forestry or timber production industry within the City and implementation of the proposed Project would not impact forestland or timberland; therefore, **no impact** would occur. (Initial Study, p. 46.)

Result in Loss of Forest Land or Conversion of Forest Land to Non-Forest Use

There is no land zoned forest land within the City of Perris. Therefore, implementation of the proposed Project would not impact land zoned for forest land and would not result in the conversion of forest land to non-forest uses. **No impact** would occur. (Initial Study, p. 46.)

Changes in the Existing Environment that Result in Conversion of Farmland to Non-Agricultural Use or Conversion of Forest Land to Non-Forest Use.

The Project site is vacant, and no agricultural production occurs at the site or in the immediate Project site vicinity. Thus, the Project would not result in changes in the existing environment that could result in conversion of farmland to non-agricultural use or conversion of forestland to non-forest use. Therefore, **no impact** would occur. (Initial Study, p. 46.)

4.1.3 Biological Resources

The following environmental topics related to biological resources were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the preparation of the Initial Study. Therefore, the following topics will not be addressed further in this Draft EIR.

Substantial Adverse Effect Any Species Identified as a Candidate, Sensitive, Or Special Status Species

A *Biological Assessment Letter Report for the First Harley Knox II (7 Parcel) Development Project*, dated April 26, 2025, was prepared for the Project by BLUE Consulting Group and is included as part of this Initial Study in Appendix A of this Draft EIR. As part of the Bio assessment, a literature review and pedestrian survey of the Project site (on and offsite area) and a 100- foot buffer, referred to as a Biological Study Area, was conducted. Additionally, a *Crotch's Bumble Bee Habitat Assessment Survey Report* dated November 25, 2024, was prepared for the Project by BLUE Consulting Group and is included as part of this Initial Study in Appendix A of this Draft EIR.

The existing trees at the Project site have the potential to provide habitat for nesting migratory birds. Therefore, to avoid violation of the Migratory Bird Treaty Act and relevant sections of the California Fish and Game code, mitigation measure **MM BR 1** (replacing PVCCSP EIR mitigation measure MM Bio 1 per the California Department of Fish and Wildlife's (CDFW) direction), would be implemented. The Project site is within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), burrowing owl survey area. No burrowing owls were observed; however, they could potentially inhabit areas of the Biological Study Area that were previously determined to be unoccupied. Therefore, mitigation measure **MM BR 2** (replacing PVCCSP EIR mitigation measure MM Bio 2 per CDFW direction)**,** which requires a 30-day pre-construction burrowing owl survey would be implemented. The Project site has a low potential to support Crotch's bumble bee due to a lack of suitable vegetation and extensive past agricultural and developmental disturbances. No historical records of the species exist in the area and no additional mitigation is required.

> **MM BR 1:** To avoid violation of the Migratory Bird Treaty Act and the California Fish and Game Code, site preparation activities (ground disturbance, construction activities, staging equipment, and/or removal of trees and vegetation) for the Project shall be avoided, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species.

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

If active nests are not located within the Project site and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, then construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, then the Biologist shall immediately establish a conservative avoidance buffer surrounding the nest based on their best professional judgement and experience. The Biologist shall monitor the nest at the onset of project activities, and at the onset of any changes in such project activities (e.g., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the Biologist determines that such project activities may be causing an adverse reaction, the Biologist shall adjust the buffer accordingly or implement alternative avoidance and minimization measures, such as redirecting or rescheduling construction or erecting sound barriers. All work within these buffers shall be halted until the nesting effort is finished (i.e., the juveniles are surviving independent from the nest). The on-site qualified biologist will review and verify compliance with these nesting avoidance buffers and will verify the nesting effort has finished. Work can resume within these avoidance areas when no other active nests are found. Upon completion of the survey and nesting bird monitoring, a report shall be prepared and submitted to City for mitigation monitoring compliance record keeping.

MM BR 2: The Project proponent shall retain a qualified biologist to conduct a pre-construction survey for resident burrowing owls no more than 30 days prior to commencement of grading and construction activities at the Project site. The survey shall include the Project site and all suitable burrowing owl habitat within a 500-foot buffer. The results of the survey shall be submitted to the City of Perris Planning Division prior to obtaining a grading permit. In addition, if burrowing owls are observed during the Migratory Bird Treaty Act nesting bird survey, to be conducted within three days prior to ground disturbance or vegetation clearance, the observation shall be reported to the Wildlife Agencies. If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity will be conducted in accordance with the current Burrowing Owl Survey Instructions for the Western Riverside MSHCP.

If burrowing owl are detected, the California Department of Fish and Wildlife (CDFW) and Western Riverside County Regional Conservation Authority (RCA) shall be sent written notification by the City, within three days of detection of burrowing owls. If active nests are identified during the pre-construction survey required by mitigation measure **MM BR 1**, the nests shall be avoided and the qualified biologist and Project applicant shall coordinate with the City of Perris Planning Division to develop a Burrowing Owl Plan to be approved by the City in consultation with the CDFW, the U.S. Fish and Wildlife Service, and the RCA prior to commencing Project activities. The Burrowing Owl Plan shall be prepared in accordance with guidelines in the CDFW Staff Report on Burrowing Owl (March 2012) and MSHCP. The Burrowing Owl Plan shall describe proposed avoidance, minimization, relocation, and monitoring as applicable. The Burrowing Owl Plan shall include the number and location of occupied

burrow sites and details on proposed buffers if avoiding the burrowing owls and/or information on the adjacent or nearby suitable habitat available to owls for relocation. If no suitable habitat is available nearby for relocation, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls may also be required in the Burrowing Owl Plan. The Permittee shall implement the Burrowing Owl Plan following CDFW, Fish and Wildlife Service, and RCA review and concurrence. A final letter report shall be prepared by the qualified biologist documenting the results of the Burrowing Owl Plan. The letter shall be submitted to the CDFW and RCA prior to the start of Project activities. When the Project biologist determines that burrowing owls are no longer occupying the Project site per the criteria in the Burrowing Owl Plan, Project activities may begin.

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

Therefore, with implementation of Project-specific mitigation measures **MM BR 1** and **MM BR 2**, the proposed Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive or special status species. Thus, potential impacts would be **less than significant with mitigation incorporated**. (Initial Study, pp. 50-54.)

Substantial Adverse Effect on Any Riparian Habitat or other Sensitive Natural Community

Riparian/Riverine areas, as defined by the MSHCP, were not observed within the Biological Study Area, and would not be impacted by the Project. The Biological Study Area lacks suitable habitat for fairy shrimp species or other vernal pool species, including plants. Thus, the Project would not 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 U.S. Fish and Wildlife Service. Therefore, **no impact** would occur. (Initial Study, pp. 54-55.)

Substantial Adverse Effect on State or Federally Protected Wetlands

The Biological Study Area A protocol wetland delineation was conducted as part of the *Biological Assessment Letter Report for the First Harley Knox II (7 Parcel) Development Project*, to evaluate potential jurisdictional features under federal, state, and local regulations that may be impacted by implementation of the proposed Project. This assessment found that the Biological Study Area, which includes a portion of the Perris Valley Storm Drain (PVSD) Channel, does not contain federally or state-protected wetlands or Waters of the U.S./State, and potential impacts would be **less than significant**. (Initial Study, p. 55.)

Substantially Interfere 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

The Biological Study Area is not located within any MHSCP designated Criteria Areas, Cells, or Subunits. The Project site is not designated as Public/Quasi-Public (PQP) or other MSHCP Conserved Lands (core, extension of existing core, non-contiguous habitat block, constrained linkage, or linkage area). The Biological Study Area does not contain wildlife nursery sites or serve as a significant wildlife corridor due to surrounding development. However, existing trees on the site may provide nesting

habitat for migratory birds, and vegetation removal during nesting season could impact active nests. To reduce potential impacts, Project-specific mitigation measure **MM BR 1**, which requires nesting bird surveys and adherence to seasonal restrictions, ensuring compliance with the Migratory Bird Treaty Act, would be implemented. Therefore, potential impacts to 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, would be **less than significant with mitigation incorporated**. (Initial Study, p. 56.)

Conflict with Local Policies or Ordinances Protecting Biological Resources such as Tree Preservation Policy

The City of Perris Municipal Code and General Plan Policies includes polices to protect biological resources including trees. The trees within the Biological Study Area do not quality as protected trees under the City's guidelines, therefore potential impacts would be **less than significant**. (Initial Study, p. 56.)

Conflict with Provisions of an Adopted Habitat Conservation Plan, Natural Community Conservation Plan or Other Approved Habitat Conservation Plan

The Project site is located within the Mead Valley Area Plan of the Western Riverside County MSHCP but is not within a Criteria Cell or Conservation Area and, therefore, does not require additional habitat evaluation or joint project review. The Biological Study Area does not support riparian, riverine, vernal pool, or narrow endemic plant habitats, and no special-status species or burrowing owl habitat was found on-site, indicating consistency with relevant MSHCP sections. The Project site is also not adjacent to Conservation Areas but would implement best management practices and mitigation measures **MM BR 1** and **MM BR 2** to address potential impacts to sensitive habitats in the vicinity during Project construction, ensuring compliance with MSHCP construction guidelines. Additionally, payment of required MSHCP and Stephen's Kangaroo Rat Habitat Conservation Plan fees would ensure that potential impacts remain less than significant and consistent with adopted conservation plans. Therefore, with implementation of Project-specific mitigation measures **MM BR 1** and **MM BR 2**, potential impacts would be **less than significant with mitigation incorporated**. (Initial Study, pp. 57-59.)

4.1.4 Cultural Resources

The following environmental topics related to cultural resources were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the preparation of the Initial Study. Therefore, the following topics will not be addressed further in this Draft EIR.

Cause a Substantial Adverse Change in the Significance of a Historical Resource

A *Phase I Cultural Resources Survey* dated November 18, 2024, was prepared by BFSA Environmental Services, and is included as part of this Initial Study in Appendix A of this Draft EIR. According to the records search, two resources intersect the northwest portion of the offsite improvement area. These resources were previously evaluated and determined that they were not California Register of Historical Resources eligible resources. There are remnant foundations from modern buildings constructed between 1978 and 1997 on the Project site; however these are not old enough to qualify for recordation or evaluation as a historical resource. Based on the results of records search and pedestrian survey, no historical resources were identified within the Project site. Therefore, **no impact** to historic resources would occur. (Initial Study, pp. 61-62.)

Cause a Substantial Adverse Change in the Significance of an Archaeological Resource

According to the records search conducted as part of the *Phase I Cultural Resources Survey* no archaeological resources were recorded within the Project site. Additionally, no archaeological resources were identified during the intensive pedestrian survey. Because there is always the potential that previously unidentified archaeological resources may be discovered during ground disturbance, Project-specific mitigation measure **MM CR 1**, listed below, would be required.

> **MM CR 1:** Prior to the issuance of grading permits, the Project proponent/developer shall retain a professional archaeologist meeting the Secretary of the Interior's Professional Standards for Archaeology (U.S. Department of Interior, 2012; Registered Professional Archaeologist preferred). The primary task of the consulting archaeologist shall be to monitor the initial ground-disturbing activities at both the Project site and any off-site project-related improvement areas for the identification of any previously unknown archaeological and/or cultural resources. Selection of the archaeologist shall be subject to the approval of the City of Perris Director of Development Services and no ground-disturbing activities shall occur at the Project site or within the off-site Project improvement areas until the archaeologist has been approved by the City.
>
> The archaeologist shall be responsible for monitoring ground-disturbing activities, maintaining daily field notes and a photographic record, and for reporting all finds to the developer and the City of Perris in a timely manner. The archaeologist shall be prepared and equipped to record and salvage cultural resources that may be unearthed during ground-disturbing activities and shall be empowered to temporarily halt or divert ground-disturbing equipment to allow time for the recording and removal of the resources.
>
> In the event that archaeological resources are discovered at the Project site or within the off-site project improvement areas, the handling of the discovered resource(s) will differ, depending on the nature of the find. Consistent with California Public Resources Code Section 21083.2(b) and Assembly Bill 52 (Chapter 532, Statutes of 2014), avoidance shall be the preferred method of preservation for Native American/tribal cultural/archaeological resources. However, it is understood that all artifacts, with the exception of human remains and related grave goods or sacred/ceremonial/religious objects, belong to the property owner. The property owner will commit to the relinquishing and curation of all artifacts identified as being of Native American origin. All artifacts, Native American or otherwise, discovered during the monitoring program shall be recorded and inventoried by the consulting archaeologist.
>
> If any artifacts of Native American origin are discovered, all activities in the immediate vicinity of the find (within a 50-foot radius) shall stop and the project proponent and project archaeologist shall notify the City of Perris Planning Division and the Soboba Band of Luiseño Indians and the Pechanga Band of Indians. A designated Native American representative from either the Soboba Band of Luiseño Indians or the Pechanga Band of Indians shall be retained to assist the project archaeologist in the significance determination of the Native American as deemed possible. The designated Native American tribal representative shall be given ample time to examine the find. The significance of Native American resources shall be evaluated in accordance with the

provisions of CEQA and shall consider the religious beliefs, customs, and practices of the Luiseño tribe. If the find is determined to be of sacred or religious value, the Native American tribal representative will work with the City and consulting archaeologist to protect the resource in accordance with tribal requirements. All analysis shall be undertaking in a manner that avoids destruction or other adverse impacts.

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

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

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

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

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

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

Therefore, potential impacts would be **less than significant with mitigation incorporated**. (Initial Study, pp. 63-65.)

Disturb Human Remains

The Project site has been historically used for agriculture except for a few small structures in the 90s and the warehouse building, parking, and associated landscape in the mid-2000s. No known cemeteries have been or are present at the Project site, so the Project site is not expected to contain human remains, including those interred outside of formal cemeteries. However, the potential exists for

previously unknown human remains to be discovered at the site during Project construction activities. Project-specific mitigation measure **MM CR 2**, listed below, would be implemented to ensure that any human remains that might be discovered at the site are treated appropriately pursuant to Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the California Public Resources Code.

> **MM CR 2**: In the event that human remains (or remains that may be human) are discovered at the Project site or within the off-site Project improvement areas during ground-disturbing activities, the construction contractors, Project archaeologist, and/or designated Native American tribal representative shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Perris Planning Division immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).
>
> If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission (NAHC), which will identify the "Most Likely Descendent" (MLD).[1] Despite the affiliation with any Native American tribal representative(s) at the site, the NAHC's identification of the MLD will stand. The MLD shall be granted access to inspect the site of the discovery of Native American human remains and may recommend to the Project proponent means for treatment or disposition, with appropriate dignity of the human remains and any associated grave goods. The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The disposition of the remains will be determined in consultation between the Project proponent and the MLD. In the event that there is disagreement regarding the disposition of the remains, State law will apply and the median with the NAHC will make the applicable determination (see Public Resources Code Section 5097.98I and 5097.94(k)).
>
> The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The locations will be documented by the consulting archaeologist in conjunction with the various stakeholders and a report of findings will be filed with the South Coastal Information Center.

With adherence to existing laws and regulations, and implementation of Project-specific mitigation measure **MM CR 2**, potential impacts with regard to the disturbance of human remains would be **less than significant with mitigation incorporated**. (Initial Study, pp. 65-66.)

4.1.5 Geology and Soils

The following environmental topics related to geology and soils were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the

[1] The "Most Likely Descendent" (MLD) is a reference used by the California Native American Heritage Commission to identify the individual or population most likely associated with any human remains that may be identified within a given project area. Under California Public Resources Code, Section 5097.98, the Native American Heritage Commission has the authority to name the MLD for any specific project and this identification is based on a report of Native American remains through the County Coroner's office. The City of Perris will recognize any MLD identified by the Native American Heritage Commission without giving preference to any particular population. In cases where the Native American Heritage Commission is not tasked with the identification of a Native American representative, the City of Perris reserves the right to make an independent decision based upon the nature of the proposed project.

preparation of the Initial Study. Therefore, the following topics will not be addressed further in this Draft EIR.

Directly or Indirectly Cause Rupture of a Known Earthquake Fault

A *Geotechnical Investigation Report* was prepared by Southern California Geotechnical in February 2022 and is included as part of this Initial Study in Appendix A of this Draft EIR. The Project site is not located within an Alquist-Priolo Earthquake Fault Zone. The possibility of significant fault ruptures at the Project site is considered to be low because no evidence of faulting. Thus, because the Project would be designed to meet or exceed the seismic safety standards set forth in the current California Building Codes, and would be consistent with the recommended seismic parameters included in the *Geotechnical Investigation Report*, it would not directly or indirectly cause potential substantial adverse effects due to a known earthquake fault. Therefore, **no impact** would occur. (Initial Study, p. 69.)

Directly or Indirectly Cause Strong Seismic Ground Shaking

There are no active faults crossing the Project site or within the City limits. However, there are several active faults within the Southern California region that may contribute to ground shaking at the Project site so the Project would be required to be designed and constructed consistent with current California Building Codes, requiring structures to be designed to meet or exceed the seismic safety standards set forth therein. Thus, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Therefore, potential impacts would be **less than significant.** (Initial Study, pp. 69-70.)

Directly or Indirectly Cause Seismic-Related Ground Failure

Subsurface conditions encountered at the boring locations as part of the *Geotechnical Investigation* determined that the Project site and offsite areas are not considered to be conducive to liquefaction. Thus, the Project would not directly, or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Therefore, potential impacts would be **less than significant.** (Initial Study, p. 70.)

Directly or Indirectly Cause Landslide Risk

The Project site is not in an area prone to slope instability and not susceptible to landslides. Due to the flat topography, implementation of the proposed Project would not directly, or indirectly, cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including landslides. Therefore, **no impact** would occur. (Initial Study, p. 70.)

Result in Substantial Soil Erosion or the Loss of Topsoil

Construction of the proposed Project would include the grading, moving, and compaction of soils at the site which have the potential to result in soil erosion or the loss of topsoil. However, grading would be required to prevent ponding of surface water and to prevent water from running into excavations. Additionally, the Project would be required to comply with standard erosional control practices and National Pollutant Discharge Elimination System (NPDES) general construction permit which requires that a Storm Water Pollution Prevention Plan (SWPPP) be prepared prior to construction activities and implemented during construction activities. (Initial Study, p. 70.)

All construction activities would also be required to comply with Chapter 33 of the California Building Code, which regulates excavation activities and the construction of foundations and retaining walls, grading activities, including drainage and erosion control. Likewise, the City performs stormwater monitoring and enforcement activities. In the developed condition, the addition of paved and landscaped

areas would, over the long term, decrease the potential for erosion because less exposed soils would exist at the site. Thus, the proposed Project is not anticipated to result in substantial soil erosion or the loss of topsoil because it will be required to comply with the standard regulatory requirements of the NPDES, requiring a SWPPP with identified BMPs, Therefore, potential impacts would be **less than significant.** (Initial Study, pp. 70-71.)

Result in Landslide, Lateral Spreading, Subsidence, Liquefaction, or Collapse

The potential for geological hazards induced by lateral spreading is considered low and only minor subsidence may occur at the Project site. The Geotechnical Investigation Report recommends remedial grading within the Project site to remove the upper portion of the native alluvium and replace these materials as compacted structural fill soils. These recommendations would be implemented as part of the Project design. Additionally, adherence to measures identified in the California Building Code, applicable standards of the City's Grading Ordinance, would reduce impacts resulting from unstable soil conditions. Therefore, the Project would result in a **less than significant impact**. (Initial Study, pp. 71-72.)

Expansive Soils that Would Create Substantial Direct or Indirect Risk to Life or Property

The Project site includes the presence of expansive soils. As such, the Project would be required to incorporate the recommendations within the *Geotechnical Investigation* prior to issuance of grading permits. Thus, the Project would not create substantial direct or indirect risks to life or property due to expansive soil. Therefore, potential impacts would **be less than significant.** (Initial Study, p. 72.)

Septic Tanks

The Project would connect to the existing sewer system and no septic tank or alternative wastewater system would be utilized. Therefore, **no impact** would occur. (Initial Study, p. 72.)

Directly or Indirectly Destroy Unique Paleontological Resource or Site or Unique Geologic Feature

A *Paleontological Resource Assessment for the First Harley Knox II Project* (Paleontological Resources Report), dated November 18, 2024, was prepared by BFSA Environmental Services. The Project site and off-site improvement area are within Paleontological Sensitivity Area 1 (High Sensitivity) and have high potential to contain significant fossil resources. Because of the high paleontological sensitivity assigned to the Project site and the depth of potential ground disturbance, Project-specific mitigation measure **MM GEO 1**, which requires a Paleontological Resource Impact Mitigation Monitoring Program, would be implemented.

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

Monitoring shall be restricted to undisturbed subsurface areas of older quaternary alluvium. The approved paleontologist shall be prepared to quickly salvage fossils as they are unearthed to avoid construction delays. The paleontologist shall also remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontologist shall have the authority to temporarily halt or divert grading equipment to a radius of 50 feet to allow for removal of abundant or large specimens.

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

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

Thus, with implementation of Project-specific mitigation measure **MM GEO 1**, potential impacts would be **less than significant with mitigation incorporated.** (Initial Study, pp. 73-74.)

4.1.6 Hazards and Hazardous Materials

The following environmental topics related to hazards and hazardous materials were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the preparation of the Initial Study. Therefore, the following topics will not be addressed further in this Draft EIR.

Create a Significant Hazard Through Routine Transport/Use/ Disposal of Hazardous Materials

The exact tenants of the proposed buildings are unknown at this time, so there is the potential that hazardous materials such as petroleum products, pesticides, fertilizer, and other household hazardous products may be stored and transported from the proposed facility during operation. However, these hazardous materials would not be manufactured at the Project site and would only be stored short-term before transport. Construction of the Project would involve the transport of fuels, lubricants, and various other liquids for operation of construction equipment. However, several federal and state agencies prescribe strict regulations for the safe transportation of hazardous materials. Compliance with all applicable laws and regulations will reduce potential impacts associated with routine transport, use, or disposal of hazardous materials. Thus, because the proposed Project would be required to comply with all applicable federal and state laws related to the transportation, use, storage and response to upsets or accidents that may involve hazardous materials, it will not create a significant hazard to the public or the environment through the routine transportation, use, or disposal of hazardous materials. Therefore, potential impacts would be **less than significant.** (Initial Study, pp. 77-79.)

Create a Significant Hazard Through the Release of Hazardous Materials

Two separate Phase I Environmental Site Assessments (hereinafter referred collectively as to the Phase I ESAs) were prepared by Weis Environmental to cover the entirety of the Project site and are included as part of this Initial Study in Appendix A of this Draft EIR. Three properties near the Project site, Interinsurance Exchange of The Automobile Club (775 Harley Knox Boulevard), All American Asphalt (4770 Indian Street), and March Air Force Base are listed in the Federal American Society for Testing and Materials (ASTM) database and may have the potential to adversely impact the Project site due to current or former releases of hazardous substances and/or petroleum products that occurred at said properties. According to the Phase I ESAs, these three properties, are not likely to have current or former releases of hazardous substances and/or petroleum products with the potential to migrate to the Project site; therefore, these sites are not considered to be significant environmental concerns to the Project site.

The previously developed portion of the Project site was listed in the Non-ASTM regulatory database because in 2013 the former occupant generated two containers of hazardous waste that contained liquid solvent mixture and organic solids. According to the Phase I ESAs, there were no chlorinated solvents, and the previous business did not appear on databases indicative of releases of hazardous substances or petroleum products to the subsurface. Therefore, the former business and waste generation are not considered recognized environmental conditions in connection with the Project site.

According to the Phase I ESAs, the Project site and surrounding area were previously used for agricultural purposes with some structural developments from approximately 1938 to about 2020. During historical agricultural activities throughout the state of California, various pesticides that are now banned from production were used. Based on regulatory and historical research, no accidental spill or release of pesticides occurred at the Project site. The potential of residual agricultural chemicals at the Project site is not a recognized environmental condition.

The pedestrian surveys were conducted on January 12, 2022, and March 17, 2023, and consisted of observing the Project site on foot via transects and walking publicly accessible areas surrounding the Project site. At the time of the survey, no wastewater treatment devices were observed. There was no evidence of ponding, wells, or ground monitoring wells observed on the Project site. No evidence of stained soil or pavement, chemical storage tanks, stressed vegetation, or unidentified substance containers were observed. Additionally, the Project site's current use and adjoining properties are not a recognized environmental condition to the Project site. As such, no environmental hazards were visually or physically observed during the Project site reconnaissance and the Project site is not expected to be a hazard to the public. Therefore, ground disturbance during Project construction is not anticipated to create a significant hazard to the public or environment.

There is a potential for hazardous materials and chemicals to be stored at the site for short periods of time prior to transport and distribution which could cause a release. However, the storage and transport of these products would be regulated by Federal, State, and local policies regarding storage and transportation of hazardous waste. Any hazardous waste-related activities for any future users at the Project site would be required to comply with all existing hazardous waste regulations. Therefore, potential impacts would be **less than significant.** (Initial Study, pp. 79-81.)

Emit Hazardous Materials in the Vicinity of Existing or Proposed Schools

There are no existing or proposed schools within a one-quarter-mile radius of the Project site. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials,

substances, or waste within one-quarter mile of an existing or proposed school. Therefore, **no impact** would occur. (Initial Study, p. 81.)

Hazardous Materials Site

The Department of Toxic Substances Control Cortese list, compiled pursuant to Government Code Section 65962.5, did not list any hazardous materials sites within or adjacent to the Project site, nor did the Phase I ESAs. As a result, the proposed Project would not result in a significant hazard to the public or the environment. Therefore, **no impact** would occur. (Initial Study, p. 81.)

Result in Safety Hazard or excessive Noise for people residing or working in the Project Area for Project Located Within an Airport Land Use Plan

The proposed Project site is located just over 5 miles northwest from the Perris Valley Airport and Skydiving Center.

The proposed Project site is also located approximately 0.30 mile southeast of March Air Reserve Base/Inland Port Airport (March ARB/IPA) and is within the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA ALUCP). The majority of Project site is located within the Airport Compatibility B1-APZ1 and Zone B2, with portions of the northwest corner and northeast corner of Project site located within Zone A and Zone C1, respectively. The Project is not required to go through Airport Land Use Commission review and consistency determination because: 1) the City created an Airport Overlay Zone component to the City's land use planning to accommodate development within the City consistent with the land use designations of the March ARB/IPA ALUCP,[2] and 2) there is no legislative action (i.e., general plan amendment, specific plan amendment, or change of zone) required or proposed.

The proposed Project use is not a noise-sensitive land use, the proposed Project would not expose people working in the Project area to excessive noise levels from airport operations. Potential impacts associated with aircraft activities and March ARB/IPA operations would be less than significant with implementation of Project-specific mitigation measure **MM AES 1** and compliance with PVCCSP EIR mitigation measures **MM Haz 2** through **MM Haz 6,** as outlined below.

> **MM Haz 2**: Prior to the recordation of a final map, issuance of a building permit, or conveyance to an entity exempt from the Subdivision Map Act, whichever occurs first, the landowner shall convey an avigation easement to the March ARB/March Inland Port Airport Authority.
>
> **MM Haz 3**: Any outdoor lighting installed shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane.
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> **MM Haz 4**: The following notice shall be provided to all potential purchasers and tenants:
>
> **MM Haz 5**: The following uses shall be prohibited:
>
> a. Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward

[2] On July 14, 2016, The Riverside County Airport Land Use Commission determined that the City's Airport Overlay Zone is consistent with the current MARB/IPA ALUCP.

a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.

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

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

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

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

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

Therefore, potential impacts would be **less than significant.** (Initial Study, pp. 81-85.)

Impair Implementation of or Physically Interfere with an Adopted Emergency Response Plan or Emergency Evacuation Plan

The Project site is located along Harley Knox Boulevard and Perris Boulevard which have both been identified as Evacuation Routes by the City of Perris General Plan Safety Element. Additionally, Riverside County has identified these roadways as potential evacuation routes due to their connectivity to other major highways and roadways. The City participates in the County of Riverside Multi-Jurisdictional Local Hazard Mitigation Plan which outlines requirements for emergency access and standards for emergency responses. It is anticipated that all local roadways would remain open during Project construction and operation. Thus, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, potential impacts would be **less than significant.** (Initial Study, pp. 85-86.)

Wildland Fires

The Project site is not located adjacent to any wildlands or any undeveloped hillsides where wildland fires might be expected to occur. Also, according to the City of Perris General Plan Safety Element, the Project area is not located within a “Very High Fire Hazard Severity Zone.” (Perris GP 2030 Safety Element, p. 19.) No wildlands are located within the Project site and the Project site is surrounded by developed properties, paved roads, and maintained vacant sites. Furthermore, the Project site does not contain natural features that would exacerbate wildland fire risk. Accordingly, implementation of the

Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Therefore, **no impact** would occur. (Initial Study, p. 86.)

4.1.7 Hydrology and Water Quality

The following environmental topics related to hydrology and water quality were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the preparation of the Initial Study. Therefore, the following topics will not be addressed further in this Draft EIR.

Violate Any Water Quality Standards or Waste Discharge Requirements or Otherwise Substantially Degrade Surface or Ground Water Quality

The proposed Project site is located within the Santa Ana River Watershed and San Jacinto River Sub-Watershed, and is within the jurisdiction of the Santa Ana Regional Water Quality Control Board. The Project developer is required to obtain coverage under the statewide Construction General Permit. Compliance with this permit requires the applicant to prepare an effective SWPPP, which would reduce potential construction-related water quality impacts to a less than significant level. Additionally, a *Project Specific Preliminary Water Quality Management* dated, January 8, 2024, and a *Preliminary Hydrology Study for Harley Knox Industrial Development Option A 657 Harley Knox Boulevard* dated May 20, 2022, were prepared by Thienes Engineering, and are included as part of the Initial Study in Appendix A of this Draft EIR. The proposed Project incorporates site design, source control and treatment control BMPs to address storm water runoff generated onsite. Thus, through BMPs combined with compliance with existing regulations, the proposed Project would not violate water quality standards, waste discharge requirements, or otherwise degrade surface or ground water quality. Therefore, potential impacts would be **less than significant.** (Initial Study, pp. 90-91.)

Substantially Decrease Groundwater Supplies or Interfere Substantially With Groundwater Recharge

The Project site is located within the Perris North Groundwater Management Zone. However, the Project site does not contain groundwater recharge facilities or groundwater production wells. Implementation of the proposed Project would increase the amount of impervious surfaces within the Eastern Municipal Water District‘s (EMWD) service area and may have the potential to impact the amount of water which percolates back into the local groundwater basin. However, the amount of impervious surface area due to implementation of the Project is negligible compared to the groundwater basin. Further, groundwater from this groundwater management zones is not utilized for domestic purposes and would not be required as part of any agricultural land use. Thus, the proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Therefore, potential impacts would be **less than significant.** (Initial Study, pp. 91-92.)

Result in Substantial Erosion or Siltation Onsite or Offsite

There are no streams or rivers currently mapped at the Project site. As such, the Project would not alter an existing stream or river. However, implementation of the proposed Project would introduce impervious surfaces throughout the Project site which may generate more onsite runoff that moves faster than the existing condition which may result in erosion on or offsite if erosive surfaces are present. Development of the proposed Project would integrate catch basins and underground storage chambers that would convey flows to the Bio Clean Modular Wetlands Systems for water quality treatment prior to being discharged to the PVSD Lateral B. During construction, the Project would be required to comply

with the Construction General Permit and implement an effective SWPPP for the control and minimization of non-stormwater runoff that could adversely affect downstream waterbodies. As such, the proposed Project would not 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 may potentially result in substantial erosion or siltation on or offsite. Therefore, potential impacts would be **less than significant.** (Initial Study, pp. 92-93.)

Substantially Increase the Rate or Amount of Surface Runoff in a Manner Which Would Result in Flooding on or Offsite

There are no streams or rivers currently mapped within the Project site. With the addition of new impervious surfaces, stormwater runoff across the site would flow at a faster rate and would have the potential to result in flooding on- or offsite. However, the Project includes new drainage facilities to convey onsite flows into new onsite storm drain systems that are sized to sufficiently to drain the Project site such that it would not result in flooding. All flows from the Project ultimately discharge into the PVSD Lateral B, which is a regional drainage facility sized to handle the runoff from development in the Perris Valley Master Drainage Plan area including additional flows from the Project. Therefore, the proposed Project would not 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite. Therefore, potential impacts would be **less than significant.** (Initial Study, p. 93.)

Runoff Water Which Would Exceed the Capacity of Existing or Planned Stormwater Drainage Systems or Provide Substantial Additional Sources of Polluted Runoff

There are no drainage features such as streams or rivers currently mapped or present within the Project site. As described in the Project Drainage Study and WQMP, with the addition of new impervious surfaces, the amount of runoff generated on the Project site would increase; however, the proposed Project would include onsite drainage improvements designed to accommodate these flows. All onsite flows will be conveyed to the proposed outfall structure then flows would discharge into the PVSD Lateral B. which is a regional drainage facility sized to handle the runoff from development in the Perris Valley Master Drainage Plan area including additional flows from the Project. Before runoff is discharged, to the PVSD Lateral B, it would be treated. Pursuant to the statewide construction general permit, the Project would be required to implement an effective SWPPP for the control and minimization of non-stormwater runoff that could adversely affect downstream waterbodies during construction. Construction of the Project is not expected to be significantly different or unique than a typical construction site. Thus, the proposed Project would not 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 substantially 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. Therefore, potential impacts would be **less than significant.** (Initial Study, pp. 93-94.)

Impede or Redirect Flood Flows

The Project site is located in “Zone X – Other Flood Areas” and “Zone D – Area of Undetermined Flood Hazard” and is not located within a flood hazard zone. There are existing storm drains along Harley Knox and Indian Avenue which ultimately convey runoff flows to the PVSD Lateral B which is located adjacent

to the northern boundary of the Project site. The proposed detention chambers would ensure that 2-year, 5-year and 10-year storm events discharge would not be higher in post-development conditions than in pre-development conditions. Thus, the proposed Project would not 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 may impede or redirect flood flows. Therefore, potential impacts would be **less than significant.** (Initial Study, p. 94.)

Flood Hazard, Tsunami, or Seiche Zones, Risk Release of Pollutants Due to Project Inundation

The Project includes catch basins and underground storage chambers which would ensure that 2-year, 5-year and 10-year storm events discharge would not be higher in post-development conditions than in pre-development conditions. The proposed Project site is within the Dam Inundation Area for the Lake Perris Dam. In a statewide effort to reduce seismic risks to dams that the California Department of Water Resources completed a major retrofit to Perris Dam. The dam upgrades were designed to withstand a magnitude 7.5 earthquake. The Project site is not located within an identified tsunami zone. As such, the Project would not be exposed to the release of pollutants due to project inundation from flood, tsunami, or seiche. Therefore, potential impacts would be **less than significant.** (Initial Study, pp. 94-95.)

Conflict With or Obstruct Implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan

The Project would be consistent with the Santa Ana Regional Water Quality Control Board Water Quality Control Plan with compliance to identified regulations. The Project site is not a designated groundwater production or recharge site and is not slated to become one in the future. Therefore, development of the Project would not conflict or obstruct the intent of the Groundwater Sustainability Plan to manage groundwater resources in a way that facilitates long-term sustainable use of groundwater in the San Jacinto Groundwater Basin. (GSP, p. 3-1.) Through implementation of existing regulations related to water quality and groundwater management, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, potential impacts would be **less than significant.** (Initial Study, p. 95.)

4.1.8 Land Use and Planning

The following environmental topic related to land use and planning were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the preparation of the Initial Study. Therefore, the following topic will not be addressed further in this Draft EIR.

Physically divide an established community

The Project site is vacant and undeveloped. The Project site area includes industrial uses to the north, south, and east of the Project site and vacant land zoned for industrial uses to the west of the Project site. The planned land uses in the vicinity of the proposed Project site have PVCCSP land use designations of General Industrial. Therefore, the proposed Project would be consistent with the surrounding land uses and **no impact** would occur. (Initial Study, p. 96.)

4.1.9 Mineral Resources

The following environmental topics related to mineral resources were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the

preparation of the Initial Study. Therefore, the following topics will not be addressed further in this Draft EIR.

Loss of a Known Mineral Resource Valuable to the Region and the Residents of the State

The Project site is located within Mineral Resource Zone Three (MRZ-3), as classified by the State Mining and Geology Board. Within MRZ-3, available geologic information suggests that mineral deposits exist, or are likely to exist; however, the significance of the deposit is unknown. Due to the existing developments in proximity to the Project site, it is unlikely that a mining operation could feasibly function if significant resources were discovered in the future. Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, **no impact** would occur. (Initial Study, p. 97.)

Loss of Locally Important Mineral Resource Delineated on a local General Plan, Specific Plan, or other Land Use Plan

No sites within the City of Perris have been designated as locally important mineral resource recovery sites on any local plan. Therefore, **no impact** would occur. (Initial Study, p. 97.)

4.1.10 Population and Housing

The following environmental topics related to population and housing were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the preparation of the Initial Study. Therefore, the following topics will not be addressed further in this Draft EIR.

Induce Unplanned Population Growth Directly or Indirectly

The proposed Project does not involve construction of any new homes and would not contribute to a direct increase in the City's population. The proposed Project may indirectly contribute to population growth within the City by creating jobs both during construction and operation. The Project is projected to create approximately 542 jobs. However, it is anticipated that the majority of new jobs would be filled by workers who already reside in the Project vicinity and that the Project would not attract a substantial number of new residents to the City. The creation of jobs and necessary infrastructure to support the land uses proposed in the PVCCSP were already addressed and analyzed in the previous PVCCSP EIR. Therefore, construction and operation of the proposed Project would not significantly induce substantial unplanned population growth either directly or indirectly. Therefore, potential impacts would be **less than significant.** (Initial Study, p. 100.)

Displace People or Housing Necessitating Construction or Replacement Housing

The Project site does not contain any existing residential uses, the Project site is currently vacant, and the PVCCSP land use designation is General Industrial. Implementation of the proposed Project, a warehouse, would not displace existing people or remove existing housing. As such, no replacement housing would be required. Therefore, neither construction or operation of the proposed Project would displace any existing homes or substantial numbers of people necessitating the construction of replace housing elsewhere. Accordingly, **no impact** would occur. (Initial Study, pp. 100-101.)

4.1.11 Public Services

The following environmental topics related to public services were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the preparation of the Initial Study. Therefore, the following topics will not be addressed further in this Draft EIR.

Substantial Adverse Physical Impacts to Fire Protection

The City provides fire protection by contract with the Riverside County Fire Department. The Project would be required to comply with Perris Municipal Code Section 19.68.020, which establishes development impact fees to mitigate the cost of public facilities needed to offset the impact of developing new facilities to support fire services. Thus, through payment of development impact fees, the Project would not result in substantial 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 fire protection. Therefore, potential impacts would be **less than significant.** (Initial Study, p. 103.)

Substantial Adverse Physical Impacts to Police Protection

The City provides police protection through a contract with the Riverside County Sheriff's Office. The Project would be required to comply with Perris Municipal Code Section 19.68.020, requiring payment of development impact fees for the local police department. Thus, the Project would not result in substantial 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 police protection. Therefore, potential impacts would be **less than significant.** (Initial Study, p. 103.)

Substantial Adverse Physical Impacts to Schools

The proposed Project is located within the boundaries of the Val Verde Unified School District. The proposed Project would not directly create a source of school-aged children, as the Project does not include any residential land uses. It may indirectly affect schools by providing a source of employment that may draw new residents into the area. However, potential impacts to school facilities would be offset through the payment of impact fees to the Val Verde Unified School District prior to the issuance of a building permit. Thus, the Project would not 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 schools. Therefore, potential impacts would be **less than significant.** (Initial Study, pp. 103-104.)

Substantial Adverse Physical Impacts to Parks

The proposed Project would not directly require the construction or expansion of public recreational facilities as it does not propose new residential uses. However, it may indirectly affect public recreational facilities by providing a source of employment that may draw new residents into the area. However, the Project developer will be required to pay development impact fees per Perris Municipal Code Section 19.68.20 which will be used to offset potential impacts to park facilities. Thus, the Project would not 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 parks. Therefore, potential impacts would be **less than significant. (**Initial Study, p. 104.)

Substantial Adverse Physical Impacts to Other Public Facilities

The proposed Project would not directly increase the demand for library or other public services because it does not propose new residential uses. However, the Project developer will be required to pay development impact fees per Perris Municipal Code Section 19.68.20 which are utilized for constructing new or expanding existing library facilities consequential to demand. The nearest emergency medical service available to the proposed Project area is the Kaiser Permanente in Moreno Valley, approximately 3.9 miles northeast of the Project site. Healthcare facilities are developed in response to perceived market demand by free enterprise. Hence, development of the proposed Project would not result in the construction of new or expanded medical facilities. Thus, the Project would not 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 other public facilities. Therefore, potential impacts would be **less than significant.** (Initial Study, pp. 104-105.)

4.1.12 Recreation

The following environmental topics related to recreation were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the preparation of the Initial Study. Therefore, the following topics will not be addressed further in this Draft EIR.

Increase Use of Parks or Recreational Facilities

The proposed Project may indirectly affect public recreational facilities by creating new jobs in the area which may draw new residents to the area. However, the Project would be required to comply with Perris Municipal Code Section 19.68.020 requiring payment of development impact fees used to construct new, expand, or replace existing recreational facilities consequential to increased demand. Thus, the proposed Project would not result in impacts to existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would not occur or be accelerated. Therefore, potential impacts would be **less than significant.** (Initial Study, p. 106.)

Include or Require Recreational Facilities

The Project includes outdoor employee amenities for employees, but this is not a use that would induce the construction or expansion of recreational facilities. The proposed Project may indirectly affect public recreational facilities by creating new jobs in the area which may draw new residents to the area. However, the Project would be required to comply with Perris Municipal Code Section 19.68.020 requiring payment of development impact fees to offset impacts to park facilities. Thus, the Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, potential impacts would be **less than significant.** (Initial Study, p. 107.)

4.1.13 Transportation

The following environmental topics related to transportation were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the

preparation of the Initial Study. Therefore, the following topics will not be addressed further in this Draft EIR.

Substantially Increase Hazards Due to a Geometric Design

No sharp curves or other hazardous traffic conditions currently exist within the Project vicinity or on the Project. The proposed Project would be required to comply with all applicable City development standards and policies for providing pedestrian walkways and applicable bike lanes (if required) so as not to conflict with vehicular circulation. The Project would also include the improvement of roadways, which include safety and operational improvements to ensure the geometric roadway designs comply with all intersection sight distance requirements and are designed for safety. In compliance with PVCCSP EIR mitigation measures **MM Trans 1** and **MM Trans 2**, improvements related to on-site roadway design and safety would be reviewed by City staff and implemented to ensure adequate sight distance be provided at each Project access location. The proposed warehouse/distribution facility would be consistent with the on-site and surrounding land use and zoning designations, and as such implementation of the Project would not introduce incompatible uses to the Project area. Therefore, potential impacts would be **less than significant.** (Initial Study, p. 109.)

> **MM Trans 1**: Future implementing development projects shall construct on-site roadway improvements pursuant to the general alignments and right-of-way sections set forth in the PVCC Circulation Plan, except where said improvements have previously been constructed.
>
> **MM Trans 2**: Sight distance at the project entrance roadway of each implementing development project shall be reviewed with respect to standard City of Perris sight distance standards at the time of preparation of final grading, landscape and street improvement plans.

Inadequate Emergency Access

The proposed Project would be required to comply with all applicable fire code and County Fire Department requirements and standards for construction, access, water mains, fire flow, and fire hydrants. Prior to any site development or future project approvals, all plans would be required to be submitted to the fire marshal for review and verification that they conform to all pertinent fire standards and requirements. Thus, the Project would not result in result in inadequate emergency access because it would be required to comply with applicable fire codes. Therefore, because implementation of the proposed Project would not result in inadequate emergency access, potential impacts would be **less than significant.** (Initial Study, p. 109.)

4.1.14 Tribal Cultural Resources

The following environmental topics related to tribal cultural resources were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the preparation of the Initial Study. Therefore, the following topics will not be addressed further in this Draft EIR.

Listed or Eligible for Listing in the California Register of Historical Resources, or in a Local Register of Historical Resources

There are no items listed or eligible for listing in the California Register of Historical Resources, or a local register of historical resources at the Project site. Further, the Project site is currently vacant. Nonetheless, there is always the potential that previously unidentified archaeological resources may be discovered during ground disturbance. With implementation of Project-specific mitigation measures **MM**

CR 1 and **MM CR 2**, potential impacts to tribal cultural resources would be **less than significant with mitigation incorporated.** (Initial Study, pp. 110-111.)

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.

On August 30, 2022, the City provided notification to the following five tribes in accordance with AB 52: the Agua Caliente Band of Cahuilla Indians, Morongo Band of Mission Indians, Pechanga Band of Indians, Rincon Band of Luiseño Indians, and Soboba Band of Luiseño Indians. The City did not receive a request for consultation from the Agua Caliente Band of Cahuilla Indians, Rincon Band of Luiseño Indians, and Soboba Band of Luiseño Indians within 30 days following notification. The Morongo Band of Mission Indians and the Pechanga Band of Indians requested consultation. The City consulted with the Pechanga Band of Indians on September 28, 2022. The City was not able to schedule a consultation meeting with the Morongo Band of Mission Indians.

On March 11, 2025, the City re-initiated contact with the Pechanga Band of Indians and the Morongo Band of Mission Indians due to an expansion of the Project site boundary. This expansion included a previously developed area southeast of the originally proposed site that was not part of the initial AB 52 consultation letter sent on August 30, 2022. The City conducted follow-up consultation with the Pechanga Band of Indians on April 8, 2025. The Morongo Band of Mission Indians did not respond to the City's March 2025 correspondence. The City has concluded AB 52 consultation for the Project. Although no tribal cultural resources have been identified on or near the Project site, as a result of AB52 consultation, Project-specific mitigation measures **MM CR 1** and **MM CR 2** would be implemented to ensure that potential impacts to tribal cultural resources would be **less than significant with mitigation incorporated.** (Initial Study, p. 111.)

4.1.15 Utilities and Service Systems

The following environmental topics related to utilities and service systems were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the preparation of the Initial Study. Therefore, the following topics will not be addressed further in this Draft EIR.

Relocation or Construction of New or Expanded Water Wastewater Treatment or Storm Water Drainage, Electric Power, Natural Gas, or Telecommunications Facilities

The Project includes construction of an on-site network of water, sewer, storm drain, electric, and gas. The Project would connect to existing water lines, sewer lines, telecommunications, and electrical lines adjacent to the Project site in Harley Knox and Indian Avenue; no new offsite infrastructure is required. Therefore, the proposed Project would not cause significant effects regarding the construction of water, sewer, storm water drainage, electrical power, natural gas, or telecommunications facilities and potential impacts would be **less than significant.** (Initial Study, pp. 112-113.)

Sufficient Water Supplies Available to Serve the Project

The EMWD determined that it would be able to provide adequate water supply to meet the potable water demand for future development allowed by the PVCCSP as part of its existing and future demands. Therefore, it can be concluded that there are sufficient water supplies available to serve the proposed Project, which is consistent with the land use assumptions of the PVCCSP for industrial uses,

from the EMWD's existing entitlements and resources as set forth in its 2020 Urban Water Management Plan and the Metropolitan Water District of Southern California's 2020 Urban Water Management Plan. The EMWD would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Thus, potential impacts to water supplies would be **less than significant.** (Initial Study, p. 113.)

Inadequate Wastewater Treatment Capacity

The EMWD's Perris Valley Regional Water Reclamation Facility receives approximately 128 million gallons per day (mgd) of wastewater. Based upon the wastewater generation rate of 1,700 gallons per day per acre for General Industrial PVCCSP land use designations applied in the PVCCSP EIR, the Project's proposed development of a warehouse/distribution facility on the approximately 25.13-gross acre Project site would generate approximately 42,721 gallons per day (0.043 mgd) of wastewater that would be treated at the Perris Valley Regional Water Reclamation Facility. As such, the proposed Project's wastewater generation represents less than one percent of the PVCCSP's total estimated wastewater generation (5.3 mgd). Since the proposed Project consists of construction and operation of a warehouse/distribution facility, it is consistent with the land use designation in the PVCCSP, and the wastewater generation analysis assumptions used for the PVCCSP EIR and would not result in impacts greater than those analyzed in the PVCCSP EIR. Therefore, implementation of the proposed Project would have a less than significant impact on the EMWD's ability to treat wastewater and would not contribute significantly to require construction or operation of new or expanded wastewater facilities. Thus, potential impacts would be **less than significant.** (Initial Study, pp. 114-115.)

Generate Excess Solid Waste

Trash, recycling, and green waste services within the City are provided by CR&R Incorporated. Waste is transported to the Perris Transfer Station and Materials Recovery Facility. At this facility, recyclable materials are separated from solid waste materials. Recyclable materials are sold in bulk and transported for processing and transformation for other uses. Solid waste from the proposed Project would be transported to either the Badlands Landfill or the El Sobrante Landfill; all of which have capacity to serve the Project. Thus, the Project would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, potential impacts would be **l**ess than significant. The proposed Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs since the Badlands and El Sobrante Landfills have the capacity to support the construction and operational waste expected from the Project. Therefore, impacts **would be less than significant.** (Initial Study, pp. 115-116.)

Comply with Federal, State, and Local Management Regulations related to Solid Waste

Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to decrease solid waste generation through mandatory reductions in solid waste quantities (e.g., through recycling and composting of green waste) and the safe and efficient transport of solid waste. The proposed Project would be required to coordinate with CR&R Incorporated to develop a collection program. Additionally, Project construction and operation would be required to comply with applicable practices enacted in AB 939, the CALGreen Code, and any other local, State, and federal solid waste management regulations. Thus, the proposed Project would be required to comply with all regulatory requirements regarding solid waste. Therefore, potential impacts would be **less than significant.** (Initial Study, p. 116.)

4.1.16 Wildfire

The following environmental topics related to wildfire were determined to have no impact, less than significant impact, or less than significant impact with mitigation incorporated during the preparation of the Initial Study. Therefore, the following topics will not be addressed further in this Draft EIR.

Impair an Adopted Emergency or Evacuation Plan
Expose Project Occupants to Pollutant Concentrations
Exacerbate Fire Risk/Require Installation or Maintenance of Associated Infrastructure
Expose People to Downslope or Downstream Flooding or Landslides

The Project site is not located within or near a State Responsibility Area, very high fire, high or moderate hazard severity zone and the Project site is generally flat with no steep slopes located on or adjacent to the affected lands that would exacerbate wildfire risk (i.e., from upslope winds). No other natural features are present on the Project site that would exacerbate wildfire risks. Therefore, the Project would have **no impact** related to wildfires. (Initial Study, p. 116.)

5.0 Environmental Analysis

CEQA Guidelines Sections 15126, 15126.2, and 15126.4 require consideration and discussion of significant environmental effects and mitigation measures recommended to minimize significant effects. All phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation (CEQA Guidelines Section 15126) and an EIR shall identify and focus on the potentially significant environmental effects of the proposed Project (CEQA Guidelines Section 15126.2).

Sections 5.1 through 5.7 of this Draft EIR examine the potentially significant environmental impacts associated with implementation of the proposed Project and focuses on the following issues.

- Agricultural Resources (Section 5.1)
- Air Quality (Section 5.2)
- Energy (Section 5.3)
- Greenhouse Gas Emissions (Section 5.4)
- Land Use and Planning (Section 5.5)
- Noise (Section 5.6)
- Transportation (Section 5.7)

Technical Studies

Technical studies providing detailed technical analyses that were used in this Draft EIR were prepared for various environmental issues, such as air quality, energy, greenhouse gas emissions, noise, and transportation. These documents are identified in the discussion for the individual environmental issue and included as technical appendices to this Draft EIR.

Analysis Format

This Draft EIR assesses how the proposed Project would impact the issue areas identified above. Each environmental issue addressed in this Draft EIR is presented in terms of the following subsections:

Setting: Provides information describing the existing environmental setting at or surrounding the Project site which may be affected as a result of the implementation of the Project and provides a description of the "baseline" conditions from which potential impacts are assessed. This section describes the physical conditions that existed when the Notice of Preparation of a Draft EIR was published and sent to responsible agencies and the State Clearinghouse.

Related Regulations: Provides a discussion of the applicable regulations with respect to each environmental issue.

Project Design Features: Provides a discussion of the Project design features as it relates to each environmental issue. Project design features are those features or elements of the Project that are included in the Project design to avoid or minimize potential environmental impacts.

Comments Received in Response to the Notice of Preparation: Provides information regarding if comment letters were received in response to the Notice of Preparation, and if so, what issues of concern were identified.

Thresholds of Significance: Provides criteria for determining the significance of Project impacts for each environmental issue.

Environmental Impacts Before Mitigation: Provides a discussion of the characteristics of the proposed Project that may have an effect on the environment; analyzes the nature and extent to which the proposed Project is expected to change the existing environment, and whether or not the Project impacts are less than or exceed the applicable thresholds of significance.

Recommended Mitigation Measures: Identifies mitigation measures to reduce potentially significant adverse impacts to the extent feasible.

Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented: Provides the conclusion of Project impact significance after the implementation of the recommended mitigation measures.

5.1 Agriculture and Forestry Resources

The focus of the following discussion is related to the potential impacts related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural uses. Cumulative impacts are discussed in *Section 7.0 – Cumulative Impact Analysis* of this Draft EIR.

The following references were used in the preparation of this section of the Draft EIR:

- California Council of Land Trusts, *Conserving California's Harvest, A Model Mitigation Program and Ordinance of Local Governments*. (Available at https://calandtrusts.org/wp-content/uploads/2014/03/conserving-californias-harvest-web-version-6.26.14.pdf, accessed June 10, 2025.) [Cited as CCLT]

- California Department of Conservation, *About DLRP,* 2024. (Available at https://www.conservation.ca.gov/dlrp/Pages/About.aspx, accessed June 25, 2024.) [Cited as DOC-A]

- California Department of Conservation, *Williamson Act Program Overview,* 2024. (Available at https://www.conservation.ca.gov/dlrp/wa/Pages/wa_overview.aspx, accessed June 25, 2024.) [Cited as DOC-B]

- California Department of Conservation, *California Important Farmland*, 2022. (Available at https://maps.conservation.ca.gov/dlrp/ciftimeseries/, accessed August 25, 2025.) [Cited as DOC 2020]

- California Public Resources Code, *Division 13, Chapter 2.5, Section 21061.1.* (Avaliable at https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=21074., accessed June 10, 2025.) [Cited as PRC 21061.1]

- City of Perris, *Perris Municipal Code,* version July 3, 2025. (Available at https://library.municode.com/ca/perris/codes/code_of_ordinances. Accessed June 25, 2024.) [Cited as Perris Municipal Code]

- City of Perris, *Perris Valley Commerce Center Specific Plan Environmental Impact Report*, November 2011. (Available at https://www.cityofperris.org/departments/development-services/specific-plans, accessed June 27, 2024.) [Cited as PVCCSP EIR]

- City of Perris, *Perris Comprehensive General Plan 2030 Environmental Impact Report*, State Clearinghouse #2004031135, October 2004. Available at https://www.cityofperris.org/home/showpublisheddocument/451/637203139698630000, accessed June 30, 2025. [Cited as Perris GP 2030 EIR]

- County of Riverside, *Volume 1: Draft Program EIR No. 521 State Clearinghouse No. 2009041065 Part 1 of 2*. February 2015. (Available at https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-general-plan-2015-DEIR-521-DEIR-No.-521.pdf, accessed June 25, 2024.) [Cited as RCGP EIR]

- County of Riverside, *Riverside County Integrated Project, General Plan Final Program Environmental Impact Report (State Clearinghouse No. 2002051143), Volume 1* (Available at https://planning.rctlma.org/general-plan-environmental-impact-report-volume-i, accessed June 13, 2025.) [Cited as EIR 441]

- County of Riverside, *Riverside County General Plan Update Project, General Plan Amendment No. 960, Volume 1 Draft Program EIR No. 521, State Clearinghouse No. 2009041065,* February 2015. (Available at https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-general-plan-2015-DEIR-521-DEIR-No.-521.pdf, accessed June 13, 2025.) [Cited as EIR 521]

5.1.1 Setting

The Project site is unimproved, vacant, and is generally flat and dominated by former agricultural/now disturbed lands that include typical non-native species vegetation. As outlined in **Table 3.0-A** in *Section 3.0 – Project Description*, the area surrounding the Project site is vacant or public facilities or used for industrial uses. The Project site is bordered by the Perris Valley Storm Drain (PVSD) Channel – Lateral "B," industrial warehouses to the east, industrial and commercial uses to the south, and vacant undeveloped land to the west.

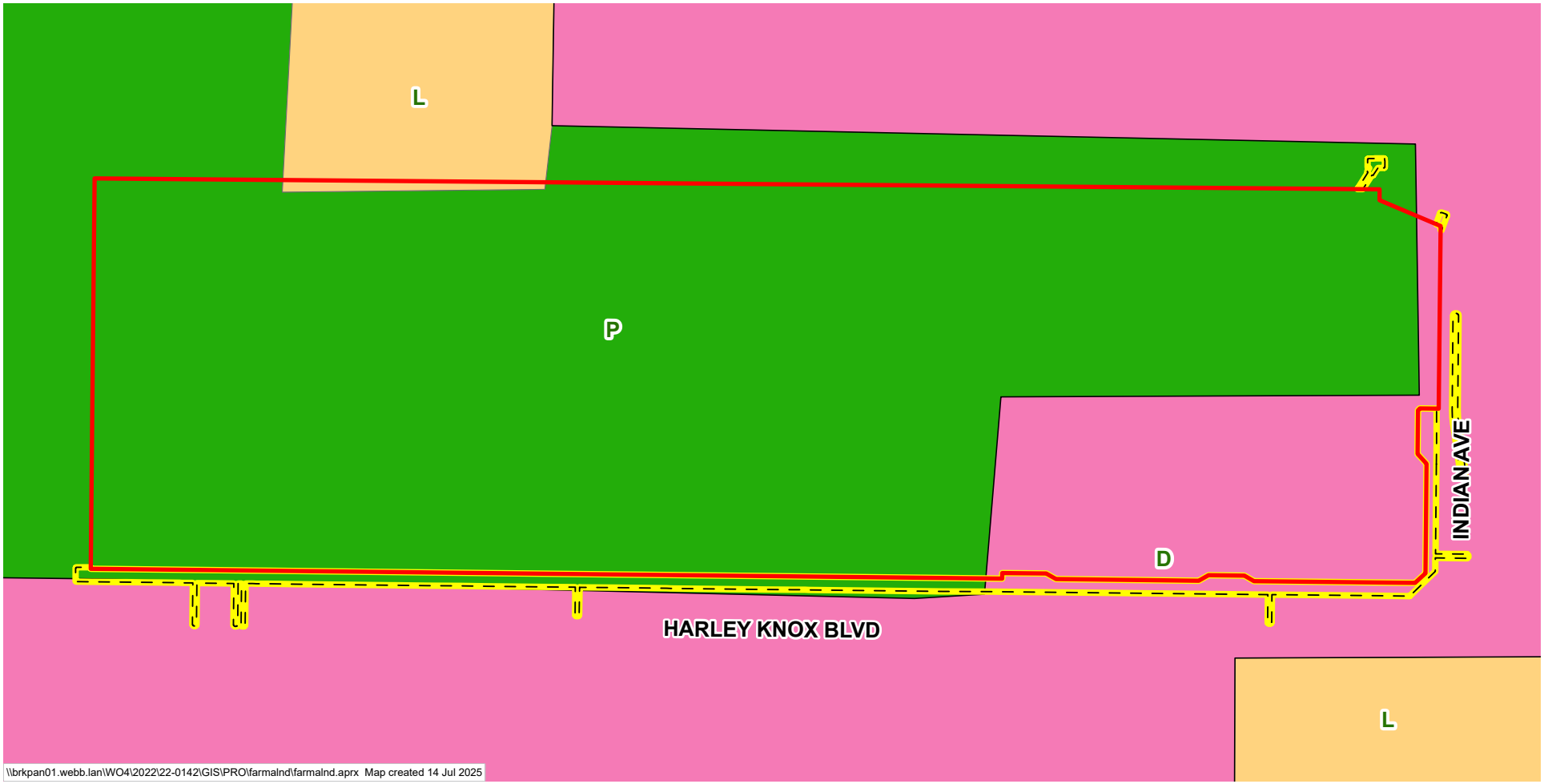
As shown on **Figure 5.1-1 – Farmland Map**, below, the Project site includes Prime Farmland, Farmland of Local Importance, and Urban and Built-up Land as defined by the Farmland Mapping Management Program of the California Department of Conservation. (DOC-A.) **Table 5.1-A – Project Site Farmland Acreage**, shows that the Project's on- and off-site development areas cover 26.28 gross acres. Of this area, the Project's on- and offsite development areas, approximately 21.66 acres are classified as Prime Farmland, 0.12 acre is classified as Farmland of Local Importance, and 4.5 acres are classified as Urban Built-Up Land. The immediate surrounding areas are primarily developed land (to the north above the Perris Valley Storm Drain, east, and south), Prime Farmland (to the north above the Perris Valley Storm Drain and west), and Farmland of Local Importance (north above the Perris Valley Storm Drain. The definitions for the various types of Farmland are provided in *Section 5.1.2* under the subheading *Farmland Mapping and Monitoring Program.*

Table 5.1-A – Project Site Farmland Acreage

Department of Conservation Farmland Categories	Onsite Development Area	Offsite Development Area	Total
Prime Farmland	21.08	0.58	21.66
Farmland of Statewide Importance	-	-	-
Unique Farmland	-	-	-
Farmland of Local Importance	0.12	-	0.12
Other Land	-	-	-
Urban and Built-Up Land	3.99	0.51	4.5
Total	25.19	1.09	26.28
Source: DOC 2020			

FIGURE 5.1-1

Farmland Map



LEGEND

- Project Boundary
- Offsite Disturbance Footprint

Designations

- P - Prime Farmland
- L - Farmland of Local Importance
- D - Urban and Built Up Land

N

0 115 230 Feet

Sources: California Department of Conservation, Farmland Mapping and Monitoring Program, 2020.

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5.1.2 Related Regulations

Federal Regulations

There are no federal regulations regarding agriculture or forestry resources that are applicable to this Project.

State Regulations

California Department of Conservation

The California Department of Conservation administers and supports a number of programs, including the Williamson Act, the California Farmland Conservancy Program, the Williamson Act Easement Exchange Program, and the Farmland Mapping and Monitoring Program. These programs are designed to preserve agricultural land and provide data on conversion of agricultural land to urban use. The Department of Conservation has authority for the approval of agreements entered into under the Williamson Act Easement Exchange Program. Key Department of Conservation tools available for land conservation planning are conservation grants, tax incentives to keep land in agriculture or open space, and farmland mapping and monitoring. (DOC-A.)

Farmland Mapping and Monitoring Program

The California Department of Conservation's Farmland Mapping and Monitoring Program compiles important farmland maps utilizing soil data from the United States Department of Agriculture - National Resource Conservation Service. Agricultural lands within each county are rated on their production value according to soil quality and irrigation status to produce maps that are updated every two years. These maps categorize land use into eight mapping categories and represent an inventory of agricultural soil resources. It is important to note that CEQA's definition of "agricultural land" only includes Prime Farmland, Farmland of Statewide Importance and Unique Farmland and does not include Farmland of Local Importance or Grazing Land. (California Public Resources Code Section 21060.1) Through the Farmland Mapping and Monitoring Program, agricultural resources and other land types are separated into the following categories. (RCGP EIR, pp. 4.5-4 – 4.5-5.):

Prime Farmland: Farmland with the best combination of physical and chemical characteristics (soil quality, growing season, moisture supply, etc.) for the long-term production of crops in high yields. These lands must have also been used for irrigated agricultural production at some time during the four years prior to the update cycle.

Farmland of Statewide Importance: Farmland other than Prime with a good combination of physical and chemical characteristics, but with minor shortcomings, such as greater slopes or less ability to store moisture. The land must also have been under irrigated production during the prior four-year cycle. Per the Riverside County General Plan, this category can include forest land, in addition to crop land, pastureland, rangeland and other lands that are not urban or water.

Unique Farmland: Lands other than the above categories that are currently used for the production of specific high value food and fiber crops, such as citrus, avocados, vegetables, etc. These lands may be of lesser quality soils, but still have the combination of traits needed to produce high quality or high yields of specific crops. This category may include non-irrigated orchards or vineyards, as well as citrus, olives, avocados, grapes, etc. The land must also have been cropped at some time during the prior four-year cycle.

Farmland of Local Importance: Farmland in this category generally does not qualify for any of the above categories but has been deemed locally important by the Riverside County Board of Supervisors. This land may also have been suitable for the "Prime" or "Statewide Importance" designations, but for the lack of available irrigation water. They can include lands in production of major, but not unique, crops, as well as dairy lands, agricultural zones (including contract lands and those in jojoba production).

Grazing Land: This includes lands on which the existing vegetation is suited to grazing livestock.

Urban and Built-Up Land: These are defined as lands occupied by structures with a building density of at least one unit per 1.5 acres or approximately six structures per 10-acre parcel. Agricultural lands surrounded by urban areas must exceed 40 acres minimum in size in order to be mapped as farmlands.

Water: This category covers perennial water bodies measuring at least 40 acres in size and larger. Those less than 40 acres are included under "Other Land."

Other Land: This refers to land not included in any other category. Commonly, this includes low-density rural developments (with five sub-categories); brush and timberlands; wetlands and riparian areas, confined livestock, poultry or aquaculture facilities; strip mines; etc. Also included are water bodies less than 40 acres in size and agricultural lands of less than 40 acres in size when surrounded by urban uses.

The number of acres of each Farmland Mapping and Monitoring Program designation within the Project's onsite and offsite development areas are shown above in **Table 5.1-A**.

California Land Conservation Act of 1965 (Williamson Act)

The California Land Conservation Act of 1965, better known as the Williamson Act (California Administrative Code Section 51200 et seq.), creates an arrangement whereby private landowner's contract with local governments to voluntarily restrict land to agricultural or related open space uses. In return, restricted parcels are assessed for property tax purposes, at a rate consistent with their actual use, rather than potential market value, which saves landowners from 20 percent to 75 percent in property tax liability each year. Local governments receive an annual subvention of forgone property tax revenues from the state via the Open Space Subvention Act of 1971 (California Government Code Section 16140- 16154). Initially signed for a minimum 10-year period, the contracts are automatically renewed each year for a successive minimum 10-year period unless a notice of non-renewal is filed, or a contract cancellation is approved by the local government. (DOC-B.)

No portion of the Project site, which includes on- and off-site, is subject to a Williamson Act contract.

Regional Regulations

There are no regional regulations regarding agriculture and forestry resources that are applicable to this Project.

Local Regulations

City of Perris Comprehensive General Plan 2030

The City of Perris Comprehensive General Plan 2030 Conservation Element contains the following goal and policy related to agriculture and forestry resources. (Perris GP 2030 Conservation Element, pp. CE-46.)

Conservation Element

Goal I Orderly conversion of agricultural lands to other approved land uses.

Perris Municipal Code

The following sections from the Perris Municipal Code are applicable to potential agricultural resources:

Chapter 19.74 – Agricultural Preserve Procedures: The City is authorized to designate suitable areas of the city as agricultural preserves by resolution of the City Council pursuant to the Williamson Act of 1965 (Government Code section 51200 et seq.) for the purpose of establishing agricultural and compatible land uses.

PVCCSP Standards and Guidelines and PVCCSP EIR Mitigation Measures

The PVCCSP and the PVCCSP EIR do not include Standards and Guidelines or mitigation measures specifically for potential impacts related to Agriculture and Forestry Resources

5.1.3 Design Considerations

The Project does not include design considerations that would specifically avoid or reduce potentially significant impacts to agriculture resources.

5.1.4 Comments Received in Response to the Notice of Preparation

One comment letter was received related to agriculture and forestry resources in response to the Notice of Preparation. The comment letter was received from the California Department of Conservation. The comment letter is identified in **Table 2.0 A – Written Comments Received During the Notice of Preparation Comment Period** and included in its entirety in Appendix A.

On June 18, 2025, a Draft EIR scoping meeting was held and verbal comments received during the meeting are summarized in **Table 2.0-B - Verbal Comments Received During the Draft EIR Scoping Meeting**. However, no verbal comments related to agricultural and forestry resources were received.

5.1.5 Thresholds of Significance

The City of Perris has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G of the *CEQA Guidelines*.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project would have no impact in the following areas and these topics are not addressed in this Draft EIR:

- Conflict with existing zoning for agricultural uses, or a Williamson Act contract;
- 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));
- Result in the loss of forest land or conversion of forest land to non-forest use; and

- 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.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project could have potentially significant impacts in the following area and this topic is addressed in this Draft EIR:

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

5.1.6 Environmental Impacts Before Mitigation

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

As discussed in *Section 5.1.1 – Setting* above, the on- and offsite Project areas are not currently being utilized for agricultural production. As shown in **Table 5.1-A – Project Site Farmland Acreage**, the Project site includes approximately 21.66 acres (21.08 onsite acres and 0.58 offsite acres) of Prime Farmland (Farmland for CEQA purposes) as designated by the Department of Conservation.

The 1991 City of Perris General Plan Land Use Element eliminated the 'agricultural' land use designation within the City limits. The analysis in the 1991 City of Perris General Plan EIR identified conversion of agricultural land to non-agricultural uses as a significant cumulative impact. Thus, a Statement of Overriding Considerations based on findings of facts that certain social and economic factors outweighed the cumulative impacts associated with conversion of agricultural land to non-agricultural uses was adopted. Since the City of Perris eliminated all agricultural land use designations in the 1991 City of Perris General Plan Land Use Element, the City of Perris General Plan does not include an Agricultural Resources Element. However, City of Perris General Plan EIR Section 6.2 (Issues Found Not To Be Significant, Agricultural Resources), which is hereby incorporated herein by reference, directly addressed this threshold topic. (PVCCSP EIR, p. 4.1-5.)

The City of Perris General Plan EIR determined that adoption of the City of Perris General Plan would have no impacts related to the conversion of Farmland to non-agricultural uses. The basis provided in the City of Perris General Plan EIR for this determination was that "The 1991 General Plan Land Use Element eliminated the 'agricultural' land use designation. Accordingly, the Environmental Impact Report prepared in conjunction with the 1991 General Plan identified conversion of agricultural land as a significant cumulative impact. Findings and facts indicating that certain social and economic factors outweighed the cumulative impacts associated with conversion of agricultural land to non-agricultural use and a Statement of Overriding Considerations were thereby adopted. Accordingly, adoption and implementation of General Plan 2030 will have no impact."

Although implementation of the proposed Project would result in the conversation of approximately 21.66 acres of Farmland within the City, as disclosed in the PVCCSP EIR the conversion of approximately 691.5 acres of Farmland, which includes the Project site's 21.66 acres, was previously addressed in the EIR prepared for the 1991 City of Perris General Plan. (PVCCSP EIR, p. 4.1-5.)

Therefore, the findings contained within the 1991 City of Perris General Plan EIR and the PVCCSP EIR are also applicable to the proposed Project and it can be concluded that the proposed Project would also have **no new significant impact** related to the conversion of Farmland to non-agricultural uses.

5.1.7 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (*CEQA Guidelines* Section 15126.4) to agricultural resources. There are no mitigation measures required to reduce impacts to agricultural resources since there are no new significant impacts.

In its June 19, 2025 letter in response to the Notice of Preparation (included in Appendix A of this Draft EIR), the Department of Conservation identified conservation easements as one potential method for mitigating loss or conversion of agricultural land. The Department of Conservation letter also stated the California Council of Land Trusts as a helpful source for regional or statewide agricultural mitigation banks. Other mitigation strategies include deed restrictions and in lieu fee programs. (CCLT, p. viii.) Although, as discussed in *Section 5.1-6 – Environmental Impacts* the Project would not result in any new significant impacts associated with the conversion of Farmland to non-agricultural uses (***Threshold A***), these measures were nonetheless evaluated for their ability to mitigate for the loss of Farmland.

Mitigation measures include actions that avoid impacts altogether or minimize, rectify, reduce, or compensate for an impact (*CEQA Guidelines* Section 15370). Under CEQA, “feasible” means “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” (Public Resources Code Section 21061.1.)

A conservation easement is a voluntary legally guiding agreement that limits certain types of uses or prevents development from taking place on a piece of property now and in the future. An agricultural conservation easement is designed to protect Farmland so that it may remain in agricultural use by removing the development pressures from the land. Because a conservation easement is voluntary, it requires finding both a willing seller and an entity willing to hold the easement and maintain the property in agricultural production. (CCLT, pp. 1, 12.)

Obtaining a new conservation easement within City limits is infeasible. The viability of large-scale agriculture in the long term is threatened by a variety of economic factors, including increasing operational constraints, land prices, environmental regulation, water supply and costs, property taxes, competition, and growing urbanization associated with housing needs. Further, long-term large scale agriculture is not consistent with the City’s overall vision for development. As evidenced by the absence of an exclusive agricultural land use designation and Goal I of the City of Perris General Plan Conservation Easement that calls for the orderly conversion of agricultural lands to other approved land uses, the City’s overall objectives and policies move the City towards economic growth that would be accomplished through development of the Project and buildout of the PVCCSP. Thus, there is no other comparable land planned for agricultural use within the City of Perris and use of a conservation easement within the City limits is infeasible.

A new conservation easement within western Riverside County is also infeasible for the same economic factors and growth pressures that affect large-scale long-term agriculture in the City. The Recirculated Public Review Draft EIR No. 521, which was prepared for County of Riverside General Plan Amendment 960, relied on the findings previously made for the County General Plan in Final EIR No. 441 (EIR No.

441) and concluded impacts to the conversion of Farmland to non-agricultural use would be significant and unavoidable. (EIR 521, p. 4.5-31.)

EIR No. 441 concluded that even though agriculture is the largest industry in Riverside County in terms of dollar value, "agriculture faces continuing pressure from urbanization, foreign competition, and rising production costs".(EIR 441, Section 4.2.1.) EIR No. 441 further determined that given the projected decline of agricultural designated uses in the Riverside County General Plan area due to urbanization and the economic viability of long-term agricultural uses, there are no reasonable or feasible mitigation measures to reduce the significant impacts resulting from the loss of agricultural land to a less than significant level. Such impacts will inevitably occur even though implementation of the Riverside County General Plan polices would encourage conservation of productive agricultural land. (EIR 441, Section 4.2.4.) Thus, the use of a conservation easement within Riverside County is infeasible.

Deed restriction or a restrictive covenant that limits the use of property is not recommended as mitigation by the California Council of Land Trusts. Deed restrictions, including covenants or other servitudes, are typically held by a benefitted landowner instead of a third-party entity with the authority to enforce the restriction. As a result, no independent entity is responsible for monitoring the property to ensure compliance with the restrictions. It is unrealistic to rely on the project proponent, project operator or landowner to enforce the terms of the deed restriction or restrictive covenant and monitoring and enforcement of deed restrictions and covenants by local agencies very rarely happens. (CCLT, p. 2.) Because enforcement of deed restriction rarely happens, a deed restriction does not meet the definition of "feasible" forth in Public Resources Code section 21061.1.

An in lieu fee program requires a project proponent to pay a specified fee to the lead agency or other designated agency. The in lieu fee is intended to be used by a third party such as a land trust or government agency to acquire mitigation property. In order to establish an in lieu fee program, the City, or any agency, would have to prepare a nexus study consistent with the requirements of California Government Code sections 65965–69568 to defensibly establish the in lieu fee and then update the fee on a regular basis in response to changes in real estate value. (CCLT, p. 3.) Use of an in-lieu fee program as mitigation for the proposed Project is infeasible due to the absence of such a program in Perris.

Regarding the use of an agricultural mitigation bank, Golden State Land Conservancy, American Farmland Trust and Rivers and Lands Conservancy provided information regarding existing land trusts within the State. There are no existing land trusts that have mitigation banks or agricultural easements in Southern California. Thus, the use of a mitigation bank in Riverside County is infeasible.

5.1.8 Summary of Environmental Effects After Mitigation Measures Are Implemented

The proposed Project would not result in any new significant impact to agricultural resources and no mitigation is required.

5.2 Air Quality

The focus of the following discussion is related to the potential for the proposed Project to have significant impacts related to compliance with air quality plans, cumulative increases of criteria air pollutants, and the exposure of sensitive receptors to substantial pollutant concentrations. The discussion also includes the existing physical setting of the Project area, sensitive land uses in proximity of the Project site, the air quality regulatory framework, and long-term air quality attainment goals for the region. Cumulative impacts are discussed in *Section 7.0 – Cumulative Impact Analysis* of this Draft EIR.

The analysis in this section is based, in part, on the *Air Quality/Greenhouse Gas Analysis for the First Industrial Logistics at Harley Knox and Indian (DPR No. 22-00016 and TPM 38684), City of Perris* (Air Quality/Greenhouse Gas Analysis) (WEBB-A) prepared by Albert A. Webb Associates dated October 16, 2025. The Air Quality/Greenhouse Gas Analysis, which is included as Appendix B to this Draft EIR, evaluated whether the expected criteria air pollutant emissions that would be generated as a result of construction and long-term operations (i.e., vehicle emissions) of the proposed Project would cause significant impacts to air quality. The Air Quality/Greenhouse Gas Analysis was prepared within the context of CEQA. The methodology follows the *CEQA Air Quality Handbook* (1993) prepared by the South Coast Air Quality Management District (South Coast AQMD) for quantification of emissions and evaluation of potential impacts to air resources. As recommended by the South Coast AQMD and City staff, the California Emissions Estimator Model (CalEEMod) version 2022.1 computer program was used to quantify Project-related emissions.

The Project site is located within the Perris Valley Commerce Center (PVCC) area of the City of Perris and is subject to the Perris Valley Commerce Center Specific Plan (PVCCSP). As required by the PVCCSP EIR mitigation measure **MM Air 15**, a health risk assessment was performed to assess the diesel particulate matter impacts from mobile-source traffic generated by the proposed Project on nearby sensitive land uses. Appendix C contains the *Diesel Particulate Matter Health Risk Assessment – First Industrial Logistics at Harley Knox and Indian (DPR 22-00016 and TPM 38684) City of Perris* prepared by Albert A. Webb Associates (referred to as the Diesel Particulate Matter HRA cited as WEBB-B) to support the conclusions presented in this section. Appendix D contains the *Construction Health Risk Assessment (First Industrial Logistics at Harley Knox and Indian (DPR No.22-00016 and TPM 38684)*, prepared by Urban Crossroads, Inc. (referred to as the Construction HRA and cited as URBAN).

In addition to other documents, the following references were used in the preparation of this section of the Draft EIR:

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5.2.1 Setting

The Project site is located in the northern portion of the City of Perris within the PVCC. The Project site located has a PVCCSP land use designation of General Industrial (GI).

As part of the approval process for the PVCCSP, an EIR (PVCCSP EIR) was prepared to assess air quality-related impacts resulting from development of land uses proposed under the PVCCSP. The PVCCSP EIR concluded that potential air quality impacts would be significant even with mitigation and recognized that some individual projects would also have a significant impact to air quality. This Project incorporates the recommendations of the PVCCSP EIR.

Physical Setting

The proposed Project site is located within the South Coast Air Basin, which is under the jurisdiction of the South Coast AQMD. The South Coast Air Basin consists of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. Regional and local air quality within the South Coast Air Basin is affected by topography, atmospheric inversions, and dominant onshore flows. Topographic features such as the San Gabriel, San Bernardino, and San Jacinto Mountains form natural horizontal barriers to the dispersion of air contaminants. The presence of atmospheric inversions limits the vertical dispersion of air pollutants. With an inversion, the temperature initially follows a normal pattern of decreasing temperature with increasing altitude; however, at some elevations, the trend reverses and temperature begins to increase as altitude increases. This transition to increasing temperature establishes the effective mixing height of the atmosphere and acts as a barrier to vertical dispersion of pollutants. (AQMD 1993.)

Dominant onshore flow provides the driving mechanism for both air pollution transport and pollutant dispersion. Air pollution generated in coastal areas is transported east to inland receptors by the onshore flow during the daytime until a natural barrier (the mountains) is confronted, limiting the horizontal dispersion of pollutants. The result is a gradual degradation of air quality from coastal areas to inland areas, which is most evident with the photochemical pollutants such as ozone formed under reactions with sunlight. (AQMD 1993.)

Climate

Terrain and geographical location determine climate in the South Coast Air Basin. The Project site lies within the terrain south of the San Gabriel and San Bernardino Mountains and is located between the San Jacinto and Santa Ana Mountains. The climate in the South Coast Air Basin is typical of southern California's Mediterranean climate, which is characterized by dry, warm summers and mild winters. Winters typically have infrequent rainfall, light winds, and frequent early morning fog and clouds that turn to hazy afternoon sunshine.

The following includes factors that govern micro-climate differences among inland locations within the South Coast Air Basin: 1) the distance of the mean air trajectory from the site to the ocean; 2) the site elevation; 3) the existence of any intervening terrain that may affect airflow or moisture content; and 4) the proximity to canyons or mountain passes. As a general rule, locations farthest inland from the ocean have the hottest summer afternoons, the lowest rainfall, and the least amount of fog and clouds. Foothill

communities in the South Coast Air Basin have greater levels of precipitation, cooler summer afternoons and may be exposed to wind funneling through nearby canyons during Santa Ana winds. Terrain will generally steer local wind patterns. (AQMD 1993.)

The Project site is located within the City of Perris, east of the I-215 freeway, south of SR-60, and west of Lake Perris State Recreational Area (**Figure 3.0-1 – Regional Map**), within the eastern portion of the South Coast Air Basin. More specifically, the Project site is located north of Harley Knox Boulevard, west of Indian Avenue.

Precipitation and Temperature

Annual average temperatures in the South Coast Air Basin are typically in the low to mid-60s (degrees Fahrenheit). Temperatures above 100 degrees are recorded for all portions of the South Coast Air Basin during the summer months. (AQMD 1993.)

The Western Regional Climate Center maintains monitoring stations and historical climate information for the western United States. The climatological station closest to the Project site is a National Weather Service Cooperative station located in Perris. As shown in **Table 5.2-A – Perris Meteorological Data**, climatological data from the National Weather Service at this station spanning from 1971-2000 shows December as the coldest month with an annual high average temperature of 61.5° F and an annual low average of 34.4° F and the July as the warmest month with an annual high average of 97.3° F and am annual low average of 59.4° F). (WRCC 2021.)

The rainy season in the South Coast Air Basin is November to April. Summer rainfall can occur as widely scattered thunderstorms near the coast and in the mountainous regions in the eastern South Coast Air Basin. Rainfall averages vary over the South Coast Air Basin. For example, the City of Riverside averages 9 inches of rainfall, while the City of Los Angeles averages 14 inches. Rainy days vary from 5 to 10 percent of all days in the South Coast Air Basin, with the most frequent occurrences of rainfall near the coast. (AQMD 1993.)

Over this same period of time, the climatological data from the Perris National Weather Service Cooperative station shows an annual average precipitation of 6.37 inches. Seventy-nine (79) percent of the annual rainfall occurs during the November to February rain season. The highest monthly average rainfall occurs during December and January. However, year to year patterns in rainfall are unpredictable due to fluctuations in the weather. General meteorological data for the Perris area, as measured at the Perris weather station, are shown in **Table 5.2-A**.

Table 5.2-A – Perris Meteorological Data

Month	Temperature (°F)		Average Precipitation (inches)
	Average High	Average Low	
January	65.6	34.5	1.83
February	67.9	36.9	0.73
March	69.9	38.8	0.25
April	74.3	41.9	0.11
May	78.8	46.6	0.21
June	87.7	53.5	0.26
July	97.3	59.4	0.04
August	95.8	60.0	0.16
September	89.5	55.2	0.07
October	77.4	46.2	0.22
November	65.7	36.7	0.89
December	61.5	34.4	1.60
Annual Average	**77.8**	**45.5**	**6.37**

Source: WRCC 2021; 1971-2000 Monthly Climate Summary

Winds

The interaction of land (offshore) and sea (onshore) breezes control local wind patterns in the area. Daytime winds typically flow from the coast to the inland areas, while the pattern typically reverses in the evening, flowing from the inland areas to the ocean. Air stagnation may occur in the early evening and early morning during periods of transition between day and nighttime flows.

Approximately 5 to 10 times a year, the City of Perris experiences strong, hot, dry desert winds known as the Santa Ana winds. These winds, associated with atmospheric high pressure, originate in the upper deserts and are channeled through the passes of the San Bernardino Mountains and into the inland valleys. Santa Ana winds can last for a period of hours or days, and gusts of over 60 miles per hour have been recorded.

High winds, including Santa Ana winds, affect dust generation characteristics and create the potential for off-site air quality impacts, especially with respect to airborne nuisance and particulate emissions. Local winds in the Project area are also an important meteorological parameter because they control the initial rate of dilution of locally-generated air pollutant emissions.

Categories of Emission Sources

Air pollutant emissions sources are typically grouped into two categories: stationary and mobile sources. These emission categories are defined and discussed in the following subsections.

Stationary Sources

Stationary sources are divided into two major subcategories: point and area sources. Point sources consist of a single emission source with an identified location at a facility. A single facility could have multiple point sources located on-site. Stationary point sources are usually associated with manufacturing and industrial processes. Examples of point sources include boilers or other types of combustion equipment at oil refineries, electric power plants, etc. Area sources are small emission sources that are widely distributed but are cumulatively substantial because there may be a large number of sources. Examples include residential water heaters; painting operations; lawn mowers;

agricultural fields; landfills; and consumer products, such as barbecue lighter fluid and hair spray. (AQMD 1993.)

Mobile Sources

Mobile sources are motorized vehicles, which are classified as either on-road or off-road. On-road mobile sources typically include automobiles and trucks that operate on public roadways. Off-road mobile sources include aircraft, ships, trains, and self-propelled construction equipment that operate off public roadways. Mobile source emissions are accounted for as both direct source emissions (those directly emitted by the individual source) and indirect source emissions, which are sources that by themselves do not emit air contaminants but indirectly cause the generation of air pollutants by attracting vehicles. Examples of indirect sources include office complexes, commercial and government centers, sports and recreational complexes, and residential developments. (AQMD 1993.)

Air Pollution Constituents

Criteria Pollutants

Air pollutants are classified as either primary, or secondary, depending on how they are formed. Primary pollutants are generated daily and are emitted directly from a source into the atmosphere. Examples of primary pollutants include carbon monoxide (CO), nitrogen dioxide (NO_2) and nitric oxide (NO)—collectively known as oxides of nitrogen (NO_X), sulfur dioxide (SO_2), fine particulates (PM-10 and PM-2.5) and various hydrocarbons or volatile organic compounds (VOC), which are also referred to as reactive organic gases (ROG). The predominant source of air emissions generated by the Project development is expected to be vehicle emissions. Motor vehicles primarily emit CO, NO_X, and VOC/ROG/hydrocarbons.

Secondary pollutants are created over time and occur within the atmosphere as chemical and photochemical reactions take place. An example of a secondary pollutant is ozone (O_3), which is one of the products formed when NO_X reacts with hydrocarbons, in the presence of sunlight. Other secondary pollutants include photochemical aerosols. Secondary pollutants such as ozone represent major air quality problems in the South Coast Air Basin.

The Federal Clean Air Act of 1970 established the National Ambient Air Quality Standards (referred to herein as the Federal Standards). Six "criteria" air pollutants were identified using specific medical evidence available at that time, and Federal Standards were established for those chemicals. The State of California has adopted the same six chemicals as criteria pollutants but has established different allowable levels. The six criteria pollutants are: carbon monoxide, nitrogen dioxide, ozone, lead, particulates less than 10 microns in size, and sulfur dioxide. The following is a further discussion of the criteria pollutants, as well as volatile organic compounds.

- **Carbon Monoxide (CO)** – A colorless, odorless toxic gas produced by incomplete combustion of carbon-containing substances. (EPA 2023.) Concentrations of CO are generally higher during the winter months when meteorological conditions favor the build-up of primary. Automobiles are the major source of CO in the South Coast Air Basin, although various industrial processes also emit CO through incomplete combustion of fuels. In high concentrations, CO can cause serious health problems in humans by limiting the red blood cells' ability to carry oxygen. (AQMD 1993.)
- **Oxides of Nitrogen (NO_X)** – Those that are important in air pollution are nitric oxide (NO) and nitrogen dioxide (NO_2). NO is a colorless, odorless gas formed by a combination of nitrogen and oxygen when combustion takes place under high temperatures and pressures. NO_2 is a reddish-

brown gas formed by the combination of NO with oxygen. Combustion in motor vehicle engines, power plants, refineries and other industrial operations, as well as ships, railroads, and aircraft are the primary sources of NO_X. NO_2 at atmospheric concentrations is a potential irritant that can cause coughing in healthy people; can alter respiratory responsiveness and pulmonary functions in people with preexisting respiratory illness; and potentially lead to increased levels of respiratory illness in children. (EPA 2023.)

- **Ozone (O_3)** – A colorless, toxic gas that irritates the lungs and damages materials and vegetation. During the summer's long daylight hours, plentiful sunshine provides the energy needed to fuel photochemical reactions between NO_2 and VOC which result in the formation of ozone. Conditions that lead to high levels of ozone are adequate sunshine, early morning stagnation in source areas, high surface temperatures, strong and low morning inversions, greatly restricted vertical mixing during the day, and daytime subsidence that strengthens the inversion layer (all of which are characteristic of western Riverside County). (EPA 2023.) Ozone represents the worst air pollution-related health threat in the South Coast Air Basin as it affects people with preexisting respiratory illness, as well as reduces lung function in healthy people. Studies have shown that children living within the South Coast Air Basin experience a 10–15 percent reduction in lung function. (AQMD 1993.)

- **Atmospheric Particulate Matter** – Made up of fine solid and liquid particles, such as soot, dust, aerosols, fumes, and mists. PM-10 consists of particulate matter that is 10 microns or less in diameter, and PM-2.5 consists of particulate matter of 2.5 microns or less in size. Both PM-10 and PM-2.5 can be inhaled into the deepest part of the lung, attributing to health effects. The presence of these fine particles by themselves cause lung damage and interfere with the body's ability to clear its respiratory tract. Said particles can also act as a carrier of other toxic substances. (AQMD 1993.)

  Sources that contribute to particulate matter pollution include: road dust, windblown dust, agriculture, construction, fireplaces and wood burning stoves, and vehicle exhaust. Specifically, South Coast AQMD data indicates that the largest component of PM-10 particles in the area comes from dust (unpaved roads, unpaved yards, agricultural lands, and vacant land that has been disked). PM-2.5 particles are mostly manmade particles resulting from combustion sources. According to the South Coast AQMD, one component of PM-2.5 pollution in Riverside comes from ammonium nitrate (NH_4NO_3) particulates. NO_X, emitted throughout the South Coast Air Basin by vehicles, reacts with ammonia produced from livestock and horses to form ammonium nitrate. Organic carbon particles generated from paints, degreasers, and vehicles are another component of PM-2.5 pollution. The last notable constituent of PM-2.5 sources is elemental carbon, which is used as a surrogate for diesel particulates. (EPA 2023.)

- **Sulfur dioxide (SO_2)** – A colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Sulfur dioxide can result in temporary breathing impairment in asthmatic children and adults engaged in active outdoor activities. When combined with atmospheric particulate matter, sulfur dioxide can cause symptoms such as shortness of breath and wheezing; and, with long-term exposure, it can lead to the exacerbation of existing cardiovascular disease and respiratory illnesses. (EPA 2023.) Although sulfur dioxide concentrations have been reduced to levels well below State and Federal Standards, further reductions in sulfur dioxide emissions are needed because SO_2 is a precursor to sulfate and PM-10.

- **Lead (Pb)** – Lead concentrations once exceeded the State and Federal air quality standards by a wide margin, but have not exceeded State or Federal air quality standards at any regular monitoring station since 1982. Health effects associated with lead include neurological impairments, mental retardation, and behavioral disorders. At low levels, lead can damage the nervous systems of fetuses and result in lowered IQ levels in children. (EPA 2023.) Though special monitoring sites immediately downwind of lead sources recorded very localized violations of the State standard in 1994, no violations have been recorded at these stations since 1996. Unleaded gasoline has greatly contributed to the reduction in lead emissions in the South Coast Air Basin. Since the proposed Project will not involve leaded gasoline, or other sources of lead emissions, this criteria pollutant is not expected to be a factor with Project implementation.
- **Reactive Organic Gases/Volatile Organic Compounds (ROG/VOC)** - It should be noted that there are no State or Federal ambient air quality standards for VOC because they are not classified as criteria pollutants. VOC are regulated; however, a reduction in VOC emissions reduces certain chemical reactions, which contribute to the formation of ozone. VOC are also transformed into organic aerosols in the atmosphere, contributing to higher PM-10 and lower visibility levels. Although health-based standards have not been established for VOC, health effects can occur from exposures to high concentrations of VOC because of interference with oxygen uptake. In general, ambient VOC concentrations in the atmosphere, even at low concentrations, are suspected to cause coughing, sneezing, headaches, weakness, laryngitis, and bronchitis. Some hydrocarbon components classified as VOC emissions are thought or known to be hazardous. Benzene, for example, is a hydrocarbon component of VOC emissions that is known to be a human carcinogen. (AQMD 2005.)

Toxic Air Contaminants

Toxic air contaminants are chemicals generally referred to as “non-criteria” air pollutants which may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health. Toxic air contaminants are generally present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at very low concentrations. For those toxic air contaminants that cause cancer, there is no concentration that does not present some low-level risk. In other words, there is no threshold below which adverse health impacts are not expected to occur. This contrasts with the criteria pollutants for which acceptable levels of exposure can be determined, and for which the State and Federal governments have set ambient air quality standards. The majority of the estimated health risk from toxic air contaminants can be attributed to relatively few compounds, the most important being atmospheric particulate matter from diesel-fueled engines, known as diesel particulate matter. In addition to diesel particulate matter, benzene and 1,3-butadiene are also significant contributors to overall ambient public health risk in California.

Both the South Coast AQMD and the California Air Resources Board (CARB) have monitoring networks within the South Coast Air Basin that measure ambient concentrations of certain toxic air contaminants which are associated with important health-related effects and are present in appreciable concentrations in the South Coast Air Basin. The South Coast AQMD uses this information to determine health risks for a particular area. CARB publishes annual statewide, air basin, and location-specific summaries of the concentration levels of several toxic air contaminants and their resulting cancer risks. The most recent summary is the CARB Air Quality Almanac for 2013; however, this version did not include a discussion of toxic air contaminants. The 2009 version of the Almanac is the most recent version which presents the relevant concentration and cancer risk data for the ten toxic air contaminants that present the most substantial health risk in California based on available data. These toxic air contaminants are: acetaldehyde, benzene, 1,3-butadiene, carbon tetrachloride, hexavalent chromium, para-

dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene. Diesel particulate matter is not directly measured but is indirectly estimated based on fine particulate matter measurements and special studies on the chemical speciation of ambient fine particulate data, along with receptor modeling techniques.

Exhaust emissions from diesel mobile sources dropped by 32 percent from 2000 to 2010 due to more stringent emissions standards and introduction of cleaner burning diesel fuel. (CARB 2013). Reductions in cancer risk are expected to continue into the future as new emission controls are implemented to further reduce diesel particulate matter emissions, which are the major component total airborne cancer risk.

The South Coast AQMD has conducted a detailed toxic air contaminants emission inventory, air sampling, and dispersion modeling study called the "Multiple Air Toxics Exposure Study (MATES-II)", AQMD 2000), MATES-III (AQMD 2008a), MATES-IV (AQMD 2014), and MATES-V (AQMD 2021b) (collectively, "MATES Studies").

The MATES Studies provided information on the importance of various toxic air contaminants in terms of their relative health risks, as well as their spatial distribution across the South Coast Air Basin. The MATES-V information can be used to characterize the "background" health risks from both regional and local toxic air contaminant emission sources based on the available toxics emission inventory for the year 2018 and a comprehensive modeling effort. The risk assessment approach was consistent with guidelines established by the Office of Environmental Health Hazard Assessment (OEHHA). The MATES-V program interactive map results indicate that the existing cancer risk attributable to toxic air contaminants in the Project site vicinity is approximately 308 in one million. (AQMD 2021a.) Two key updates were implemented in MATES-V. First, MATES-V estimated cancer risks resulting from both inhalation and non-inhalation pathways whereas previous MATES Studies calculated cancer risks from inhalation pathways only. The cumulative cancer risk accounting for inhalation and non-inhalation pathways is approximately eight percent higher than the inhalation-only calculation for the MATES-V data. Second, MATES-V also includes information on the chronic non-cancer health impacts from inhalation and non-inhalation pathways for the first time. The cumulative chronic hazard index accounting for the inhalation and non-inhalation pathways is approximately twice the inhalation-only calculation for the MATES-V data. Cancer risks and chronic non-cancer health impacts from MATES-II through -IV measurements were also re-examined using current OEHHA and California Environmental Protection Agency (California EPA) risk assessment methodologies and modern statistical methods to examine the trends over time. (AQMD 2021b, pp. ES-2, ES-5.)

As in previous MATES iterations, diesel particulate matter is the largest contributor to overall air toxics cancer risk. However, the average levels of diesel particulate matter in MATES-V are 53 percent lower at the 10 monitoring sites compared to MATES-IV and 86 percent lower since MATES-II based on monitored data. Based on other South Coast AQMD analyses of projected diesel particulate matter emissions in future years, significant decreases in diesel particulate matter health impacts are expected within the next 5-10 years. These reductions reflect recent and continued efforts by the South Coast AQMD, CARB and U.S. Environmental Protection Agency (U.S. EPA) that reduce diesel particulate matter emissions, especially from mobile sources. (AQMD 2021b, p. ES-6.)

The MATES-V concludes that air toxics cancer risk continues to decline throughout the South Coast Air Basin with a 40 percent decrease in risk since MATES-IV and an 84 percent decrease since MATES-II, based on measurement data at the fixed monitoring locations. The estimated South Coast Air Basin-

wide population-weighted cancer risk calculated from the modeling data leads to a similar conclusion with a 54 percent decrease since MATES-IV. (AQMD 2021b, p. ES-16.)

Diesel Emissions

Diesel engines utilize compression, contrary to standard gasoline engines which use conventional spark plugs, to ignite fuel. Engines that use compression typically run at higher temperatures than gasoline engines, thereby causing the oxygen and nitrogen present in air during intake, to form NO_X. To combat NO_X production in a diesel engine, the engine temperature can be reduced however, increased amounts of particulate matter and hydrocarbons are produced as byproducts of the now uncombusted fuel. Hydrocarbons, once in the atmosphere, react with NO_X to produce ozone, among other pollutants. Diesel exhaust composition is dependent on many factors: fuel composition, engine type, lubricating oils, and emission control systems. Diesel exhaust is a complex mixture of thousands of gases and fine particles. The gaseous fraction of diesel exhaust is comprised of typical combustion gases such as oxygen, carbon dioxide, nitrogen, and water vapor. However, air pollutants such as carbon monoxide, sulfur oxides (SO_X), NO_X, volatile hydrocarbons, and low-molecular weight polycyclic aromatic hydrocarbons and polycyclic aromatic hydrocarbons-derivatives are also components of the gaseous fraction. Additionally, some of the gaseous components, such as benzene, are known carcinogens.

The particle fraction of diesel exhaust is comprised of aggregates of carbon particles with inorganic and organic substances adhered to them. The inorganic fraction of diesel exhaust particles consists of solid carbon (or elemental carbon) particles ranging in size from 0.01 to 0.08 microns in diameter. The organic fraction consists of soluble organic compounds such as aldehydes, alkanes, alkenes, polycyclic aromatic hydrocarbons, and polycyclic aromatic hydrocarbons derivatives. The total component of a diesel particle (inorganic + organic) is in the fine particle range of 10 microns in size or less (width of a human hair), but 92 percent of these diesel particles are even smaller, at less than 1 micron in diameter. Diesel particles can remain airborne for up to 10 days because of their small size. Therefore, they do not fall out or precipitate easily and remain an air quality problem for some time after being emitted. Scientists use elemental carbon as a surrogate since there is no current technology available to monitor directly for diesel particles. The addition of diesel particulate toxicity dramatically increases carcinogenic risk and diesel particulate matter accounts for approximately 50 percent of total cancer risk according to the most recent South Coast AQMD MATES-V study. (AQMD 2021b, p. 2-63.)

It is important to understand that the cancer risks estimated by CARB related to mobile-source diesel exhaust and health risk assessment studies represent the probability that a person develops cancer; the estimated risks do not represent mortality rates.

Sources and Effects of Criteria Air Pollutants

Sources and typical effects of criteria pollutants are summarized in **Table 5.2-B – Primary Sources and Effects of Criteria Pollutants**.

In December 2018, in the case of Sierra Club v. County of Fresno (2018) 6 Cal.5th 502, the Friant Ranch Case, the California Supreme Court held that an EIR's air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. The correlation between project-specific emissions and potential health impacts is complex and the South Coast AQMD has determined that attempting to quantify health impacts from projects that are not regional in scale (e.g., South Coast Air Basin-wide) may not be appropriate because it may be misleading and unreliable for various reasons including modeling limitations as well as where in the atmosphere the air pollutants interact and form. (AQMD

2015.) To date, the South Coast AQMD has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health. However, if a project in the South Coast Air Basin exceeds the South Coast AQMD regional significance thresholds, the project could contribute to an increase in health effects in the basin until the attainment standard(s) are met in the South Coast Air Basin.

Monitored Air Quality

The Project site is located within South Coast AQMD Source Receptor Area 24 (Perris Valley). Prior to 2022, ambient air emissions of ozone within Source Receptor Area 24 were monitored at the Perris Valley station, which was located in downtown Perris. This monitoring station also measured ambient concentrations of PM-10 prior to 2021. Ambient air quality concentrations are no longer monitored within Source Receptor Area 24. The most recent published data for the Perris area is presented in **Table 5.2-C – Local Air Quality Monitoring Summary from 2022–2024**. This data indicates that the baseline air quality conditions in the Project area include occasional events of very unhealthful air. However, the frequency of smog alerts has dropped significantly in the last decade. Atmospheric concentrations of ozone and particulate matter are the two most significant air quality concerns in the Project area. Locally, no second stage alert (0.35 parts per million/hour) has been called by the South Coast AQMD in over thirty years. In fact, the last second stage alert was in Upland in 1988.

Table 5.2-B – Primary Sources and Effects of Criteria Pollutants

Pollutant	Primary Effects
Ozone (O_3)	• Respiratory Symptoms • Worsening of lung diseases leading to premature death • Damage to lung tissue • Crop, forest and ecosystem damage • Damage to a variety of materials, including rubber, plastics, fabrics, paint and metals.
PM-2.5 (particulate matter less than 2.5 microns in aerodynamic diameter)	• Premature death • Hospitalization for worsening of cardiovascular disease • Hospitalization for respiratory disease • Asthma-related emergency room visits • Increased symptoms, increased inhaler usage
PM-10 (particulate matter less than 10 microns in aerodynamic diameter)	• Premature death & hospitalization, primarily for worsening of respiratory disease • Reduced visibility and material soiling
Nitrogen Oxides (NO_X)	• Lung irritation • Enhanced allergic responses
Carbon monoxide (CO)	• Chest pain in patients with heart disease • Headache • Light-headedness • Reduced mental alertness
Sulfur dioxide (SO_2)	• Worsening of asthma: increased symptoms, increased medication usage, and emergency room visits
Lead	• Impaired mental functioning in children • Learning disabilities in children • Brain and kidney damage
Hydrogen Sulfide (H_2S)	• Nuisance odor (rotten egg smell) • At high concentrations: headache & breathing difficulties
Sulfate	• Same as PM-2.5, particularly worsening of asthma and other lung diseases • Reduces visibility
Sulfate	• Same as PM-2.5, particularly worsening of asthma and other lung diseases • Reduces visibility
Vinyl Chloride	• Central nervous system effects, such as dizziness, drowsiness & headaches • Long-term exposure: liver damage & liver cancer
Visibility Reducing Particles	• Reduced airport safety, scenic enjoyment, road safety, and discourages tourism
Toxic Air Contaminants About 200 chemicals have been listed as toxic air contaminants	• Cancer • Reproductive and development effects • Neurological effects

Source: https://ww2.arb.ca.gov/resources/common-air-pollutants

Table 5.2-C – Local Air Quality Monitoring Summary from 2022—2024

	Pollutant/Standard	Monitoring Years		
		2022	2023	2024
No. Days Exceeded	**Ozone (O_3) [a]:**			
	California Standard:			
	1-Hour - 0.09 ppm	30	48	53
	8-Hour - 0.07 ppm	72	70	102
	Federal Primary Standards:			
	8-Hour - 0.070 ppm	70	69	98
	Max 1-Hour Conc. (ppm)	0.122	0.139	0.135
	Max 8-Hour Conc. (ppm)	0.095	0.106	0.111
No. Days Exceeded	**Carbon Monoxide (CO)[a]:**			
	California Standard:			
	1-Hour - 20 ppm	0	0	0
	8-Hour - 9.0 ppm	0	0	0
	Federal Primary Standards:			
	1-Hour - 35 ppm	0	0	0
	8-Hour - 9.0 ppm	0	0	0
	Max 1-Hour Conc. (ppm)	3.30	1.40	1.80
	Max 8-Hour Conc. (ppm)	1.20	1.20	1.40
No. Days Exceeded	**Nitrogen Dioxide (NO_2) [a]:**			
	California Standard:			
	1-Hour - 0.18 ppm (180 ppb)	0	0	0
	Federal Standard:			
	Annual Arithmetic Mean (53.4 ppb)	13.2	12.10	12.70
	Max. 1-Hour Conc. (ppb)	55.9	54.70	62.10
No. Days Exceeded	**Sulfur Dioxide (SO_2) [a]:**			
	California Standards:			
	1-Hour – 0.25 ppm (250 ppb)	0	0	0
	Federal Primary Standards:			
	1-Hour – 0.075 ppm (75 ppb)	0	0	0
	Max. 1-Hour Conc. (ppb)	6.70	3.10	2.00
No. Days Exceeded	**Suspended Particulates (PM-10) [a]:**			
	California Standards:			
	24-Hour - 50 $\mu g/m^3$	55	43	58
	Federal Primary Standards:			
	24-Hour – 150 $\mu g/m^3$	0	1	0
	Annual Arithmetic Mean ($\mu g/m^3$)	19.80	32.70	35.90
	Max. 24-Hour Conc. ($\mu g/m^3$)	91	166	119
No. Days Exceeded	**Fine Particulates (PM-2.5) [a]:**			
	Federal Primary Standards:			
	24-Hour – 35$\mu g/m^3$	1	1	5
	Federal/State Annual Arithmetic Mean (12 $\mu g/m^3$)	10.80	10.47	12.09
	Max. 24-Hour Conc. ($\mu g/m^3$)	38.50	48.70	63.50

Notes: -- indicates no data available; ppm = parts per million; ppb = parts per billion; $\mu g/m3$ = micrograms/cubic meter
[a] Metro Riverside County 1 air monitoring station (Source Receptor Area 23) data summaries used because Source Receptor Area 24 does not have a monitoring station.
Source: AQMD 2025

Attainment Status

The U.S. EPA has established Federal Standards for the six criteria pollutants described in **Table 5.2-C** to protect human health, with an adequate margin of safety. Likewise, the California EPA has developed statewide thresholds for each of the criteria pollutants. If the concentration of one or more criteria pollutants within a geographic area is found to exceed the established statewide or Federal Standards threshold level for one of the criteria pollutants, the area is considered to be in nonattainment for that pollutant.

Source Receptor Area 24 and the proposed Project site are located within a portion of the South Coast Air Basin that is designated as nonattainment for PM-10 by the state, as well as nonattainment for ozone and PM-2.5 under both the State and Federal Standards (see Attainment **Table 5.2-D – Attainment Status**). As a result, South Coast AQMD is required to develop an Air Quality Management Plan (AQMP) for the South Coast Air Basin to bring the area into attainment for all criteria pollutants.

Table 5.2-D – Attainment Status

Criteria Air Pollutant	Attainment Designation	
	State	Federal
1-Hour Ozone	Nonattainment	Nonattainment (Extreme)
8-Hour Ozone	Nonattainment	Nonattainment (Extreme)
Carbon monoxide (1-Hour and 8-Hour)	Attainment	Attainment (Maintenance)
Nitrogen dioxide	Attainment	Attainment (Maintenance)
Sulfur dioxide	Attainment	Unclassifiable/Attainment
PM-10	Nonattainment	Attainment (Maintenance)
PM-2.5	Nonattainment	Nonattainment (Serious)

Source: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/appendix-ii.pdf?sfvrsn=63c2bd61_6

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution, as identified by the South Coast AQMD, may include children, the elderly, and people with cardiovascular and chronic respiratory diseases. Sensitive receptors may include residences, schools, playgrounds, athletic facilities, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes. (AQMD 2005) Sensitive receptors in the Project vicinity primarily include existing residences to the southwest of the Project site that are legal, non-conforming uses.

5.2.2 Related Regulations

The Federal and State Ambient Air Quality Standards establish the context for the local AQMP and for determination of the significance of a project's contribution to local or regional pollutant concentrations. Federal and State ambient air quality standards are presented in **Table 5.2-C**. The ambient air quality standards represent the level of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. They are designed to protect those people most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other diseases or illness, and persons engaged in strenuous work or exercise, all referred to as “sensitive receptors.” South Coast AQMD defines a "sensitive receptor" as a land use or facility such as schools, childcare centers, athletic facilities, playgrounds, retirement homes, and convalescent homes. (AQMD 1993.)

Federal

Clean Air Act

The U.S. EPA is the lead Federal Agency charged with the implementation and enforcement of the Clean Air Act. As part of this effort, the U.S. EPA is responsible for the establishment of national ambient air quality standards. They are designed to protect those sensitive receptors most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other disease or illness and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

The Clean Air Act (and its subsequent amendments) requires each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP). The Clean Air Act Amendments dictate that states containing areas violating the Federal Standards must revise their SIPs to include extra control measures to reduce air pollution. California's SIP includes strategies and control measures to attain the Federal Standards by deadlines established by the Clean Air Act. The SIP is periodically modified to reflect the latest emissions inventories, plans and rules and regulations of the various agencies with jurisdiction over the State's air basins. The U.S. EPA has the responsibility to review all SIPs to determine if they conform to the requirements of the Clean Air Act.

The 1977 Federal Clean Air Act Amendments required the U.S. EPA to identify national emissions standards for hazardous air pollutants to protect public health and welfare. Hazardous air pollutants include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 Federal Clean Air Act Amendments, which expanded the control program for hazardous air pollutants, 189 substances and chemical families were identified as hazardous air pollutants.

State Regulations

California Environmental Protection Agency

The mission of the California EPA is to restore, protect and enhance the environment, to ensure public health, environmental quality, and economic vitality. This is accomplished by developing, implementing, and enforcing environmental laws that regulate air, water and soil quality, pesticide use and waste recycling and reduction. Relevant to air quality, the California EPA consists of CARB and the OEHHA.

In 2012, the Legislature passed Senate Bill (SB) 535, which targets disadvantaged communities in California for investment of proceeds from the State's cap-and-trade program to improve public health, quality of life, and economic opportunity in California's most burdened communities, while also reducing pollution. SB 535 directed that 25 percent of the proceeds from the Greenhouse Gas Reduction Fund go to projects that provide a benefit to disadvantaged communities. The legislation gave the California EPA responsibility for identifying those communities. In 2016, the Legislature passed Assembly Bill (AB) 1550, which now requires that 25 percent of proceeds from the fund be spent on projects located in disadvantaged communities. The California EPA has prepared a list of disadvantaged communities for the purpose of SB 535 and CalEnviroScreen is a general mapping tool developed by the OEHHA to help identify California communities that are most affected by sources of pollution.

According to the City of Perris General Plan Environmental Justice Element, the only census tracts in the City identified as disadvantaged communities using CalEnviroScreen 4.0 are 428, 429.01, and 429.04. (Perris GP 2030 Environmental Justice Element, EJ p. 12.) As shown on Environmental Justice Element

Figure 1: Disadvantaged Communities in Perris, the Project site is not located within those census tracts. (Perris GP 2030, EJ p. 11.

With regard to the Community Air Protection Program, each year CARB's governing board (Board) is required to consider selecting communities for participation in the Community Air Protection Program per AB 617. Communities are selected for developing community air monitoring systems, emissions reduction programs, or both in order to improve air quality in their community. Over the first four years of the Program, the Board selected 17 communities where these focused actions are underway (CARB 2023). The City of Perris is not one of the selected communities and to date has not been nominated to participate in the Community Air Protection Program. (CARB 2024.)

California Air Resources Board (CARB)

In addition to being subject to the requirements of the Federal Clean Air Act, air quality in California is also governed by more stringent regulations under the California Clean Air Act. CARB, which became part of the California EPA in 1991, is responsible for administering the California Clean Air Act and establishing the California Ambient Air Quality Standards (referred to herein as State Standards). The California Clean Air Act, as amended in 1992, requires all air districts in the State to achieve and maintain the State Standards, which are generally more stringent than the Federal Standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in **Table 5.2-B**.

The California Clean Air Act requires CARB to designate areas within California as either attainment or non-attainment for each criteria pollutant based on whether the State Standards have been achieved. Under the California Clean Air Act, areas are designated as non-attainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as non-attainment. State Standards attainment status is shown in **Table 5.2-D**.

California also regulates toxic air contaminants through its air toxics program, mandated in Chapter 3.5 (Toxic Air Contaminants) of the Health and Safety Code (Health and Safety Code Sections 39660, et seq.) and Part 6 Air Toxics "Hot Spots" Information and Assessment (Health and Safety Code Sections 44300, et seq.). CARB, working in conjunction with the OEHHA, identifies toxic air contaminants. Air toxic control measures may then be adopted to reduce ambient concentrations of the identified toxic air contaminant below a specific threshold based on its effects on health, or to the lowest concentration achievable through use of best available control technology for toxics. The program is administered by CARB. Air quality control agencies, including the South Coast AQMD, must incorporate air toxic control measures into their regulatory programs or adopt equally stringent control measures as rules within six months of adoption by CARB. (AQMD 2005.)

Diesel Risk Reduction Plan

In 1998, CARB listed diesel particulate as a toxic air contaminant. CARB, a sub-agency of the California EPA, took the lead on addressing diesel emissions in the State of California. The first step to significantly reduce diesel emissions occurred in September 2000 when CARB approved the "Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles" or Diesel Risk Reduction Plan. The two main goals of the Diesel Risk Reduction Plan are: 1) to get new diesel fueled engines to use state-of-the-art emission controls as well as low-sulfur diesel fuel and, 2) for existing diesel engines to be retrofitted with emission control features. Effects of meeting these goals set by CARB would be reducing the health effects experienced by Californians from diesel exhaust.

Under CARB's Diesel Risk Reduction Program, mobile diesel emissions have their own set of reduction programs, as opposed to stationary diesel sources (generators) which are addressed separately under the Reduction Plan. One of the incentive programs for mobile diesel sources is the Carl Moyer Program which is a clean engine incentive program. This program provides money in the form of grants to cover the incremental portion of the cost to purchase cleaner burning engines or retrofitting existing ones.

Other programs include a program designed to develop and implement strategies to reduce emissions from new on-road heavy-duty diesel engines. The primary method of implementing this program will be through the development of emission control regulations and test procedures for those new engines. The California Exhaust Emission Standards and Test Procedures for 2004 and Subsequent Model Heavy-Duty Diesel Engines and Vehicles were amended on September 1, 2017, and reduce emission from new on-road heavy-duty diesel engines.

Strategies for reducing diesel emissions from existing on-road heavy duty engines are mainly implemented through three sections of this program: retrofit assessment, heavy-duty testing and field support, and retrofit implementation. CARB staff have developed a regulation to reduce diesel particulate matter and other emissions from existing on-road heavy-duty diesel-powered vehicles operating in California. These regulations were adopted by CARB in December 2008 and last amended in December 2014. By 2023, nearly all trucks and buses would have 2010 model year engines or equivalent.

Air Quality and Land Use Handbook

In addition to the above listed programs and regulations, CARB's Air Quality and Land Use Handbook (CARB 2005) provides recommendations for siting new sensitive land uses. These recommendations include a 1,000-foot buffer between new sensitive land uses and 500-foot buffer from freeways or urban roads with 100,000 vehicles per day. The Air Quality and Land Use Handbook also recommends avoiding the placement of new sensitive land uses within 1,000 feet of a distribution center (accommodating more than 100 trucks per day, 40 trucks with transport refrigeration units (TRUs), or where TRUs operate more than 300 hours a week) and to take into account the configuration of existing distribution centers and avoid locating residences and other sensitive land uses near entry and exit points. These are recommendations, not mandates, and land use decisions ultimately lie with the local agency which needs to balance other considerations.

In April 2017, CARB published a technical advisory, Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. (CARB 2017.) This technical advisory is related to infill development but provides information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and

promote equity and environmental justice. Key strategies include traffic management measures, site design features, and indoor high efficiency filtration.

California Energy Code (California Code of Regulations, Title 24)

Energy Conservation Standards for new residential and commercial buildings were originally adopted by the California Energy Resources Conservation and Development Commission in June 1977 (Title 24 California Code of Regulations Part 6). In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The 2012 Appliance Efficiency Regulations (Title 20 California Code of Regulations Sections1601-1608) became effective in 2013. The regulations include standards for both federally-regulated appliances and non-federally regulated appliances.

The current 2022 Building Energy Efficiency Standards (Energy Code) went into effect January 1, 2023 and encourage efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. (CEC 2022.) The next iteration of the Building Energy Efficiency Standards (Energy Code) goes into effect on January 1, 2026 and expands the use of heat pumps in newly constructed residential buildings, encourages electric-readiness, strengthens ventilation standards, and more. (CEC 2025) The Project would be subject to the Title 24 Standards in effect at the time that the building permits are issued.

California Green Building Code

Part 11 of the California Building Standards Code in Title 24 of the California Code of Regulations is also known as the CALGreen Code. The development of the CALGreen Code is intended to: (1) cause a reduction in greenhouse gas emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The current cycle of the CALGreen Code was also adopted in 2022. Sections of the 2022 CALGreen Code applicable to this Project include, but are not limited to (CBSC):

- **Bicycle parking.** Comply with Sections 5.106.4.1 and 5.106.4.2; or meet local ordinance, whichever is stricter.
    - 5.106.4.1.1 Short-term bicycle parking. If the project is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5 percent of visitor motorized vehicle parking capacity, with a minimum of one two-bike capacity rack.
    - 5.106.4.1.2 Long-term bicycle parking. For buildings with over 10 tenant-occupants, provide secure bicycle parking for 5 percent of motorized vehicle parking capacity, with a minimum of one space. Acceptable parking facilities shall be convenient from the street and may include: 1. Covered, lockable enclosures with permanently anchored racks for bicycles; 2. Lockable bicycle rooms with permanently anchored racks; and 3. Lockable, permanently anchored bicycle lockers. Note: Additional information on recommended bicycle accommodations may be obtained from Sacramento Area Bicycle Advocates.
    - 5.106.4.1.5. Acceptable bicycle parking facilities shall be convenient from the street and shall meet one of the following:
        - Covered, lockable enclosures with permanently anchored racks for bicycles;

- Lockable bicycles rooms with permanently anchored racks; or
- Lockable, permanently anchored bicycle lockers.

- **Electric Vehicle (EV) Charging.** Construction shall provide electric vehicle infrastructure and facilitate electric vehicle charging to comply with Section 5.106.5.3.1 EV capable spaces, Section 5.106.5.3.2 Electric vehicle charging stations and associated Table 5.106.5.3.1 (provided below as **Table 5.2-E – CALGreen Code Electric Vehicle Charging Space Calculations**), or Section 5.106.5.3.6 Electric Vehicle Charging Stations (EVCS) – Power allocation method and associated Table 5.106.5.3.6 (provided below as **Table 5.2-F – CALGreen Code Electric Vehicle Charging Stations Power Allocation Method**), and shall be provided in accordance with the California Building Code and the California Electrical Code.
- **EV Capable Spaces**. EV Capable shall be provided in accordance with Table 5.106.5.3.1 (provided below as **Table 5.2-E – CALGreen Code Electric Vehicle Charging Space Calculations**) and the following requirements:

  1. Raceway(s) complying with the California Electrical Code and no less than 1-inch (25mm) diameter shall be provided and shall originate at a service panel or a subpanel(s) serving the area and shall terminate in close proximity to the proposed location of the EV cable space and into a suitable listed cabinet, box, enclosure or equivalent. A common raceway may be used to serve multiple EV capable spaces.
  2. A service panel or subpanel(s) shall be provided with a panel space and electrical load capacity for a dedicated 208/240 volt, 40-ampere minimum branch circuits for each EV capable Space, with delivery of 30-ampere minimum to installed electrical vehicle supply equipment (EVSE) at each EVCS.
  3. The electrical system and any on-site distribution transformers shall have sufficient capacity to supply full rated amperage at each EV capable space.
  4. The service panel or subpanel(s) circuit directory shall identify the reserved overcurrent protective device space(s) as “EV CAPABLE.” The raceway termination location shall be permanently and visibly marked as “EV CAPABLE.”

     Note: A parking space served by electric vehicle supply equipment or designed as a future EV charging space shall count as at least one standard automobile parking space only for the purpose of complying with any applicable minimum parking space requirements established with an applicable minimum parking spaces requirements by an enforcement agency. See Vehicle Code Section 22511.2 for further details.

Table 5.2-E – CALGreen Code Electric Vehicle Charging Space Calculation

Total Number of Actual Parking Spaces	Number of Required EV Capable Spaces	Number of EVCS (EV Capable Spaces provided with EVSE)[2,3]
0-9	0	0
10-25	4	0
26-50	8	2
51-75	13	3
76-100	17	4
101-150	25	6
151-200	35	9
201 and over	20 percent of total actual parking spaces[1]	25 percent of EV capable spaces[1]

Source: CBSC; Table 5.106.5.3.1
Notes:
1. Calculation for spaces shall be rounded up to the nearest whole number.
2. The number of required EVCS (EV capable spaces provided with EVSE) in column 3 count toward the total number of required EV capable spaces shown in column 2.
3. At least one Level EVSE shall be provided.

- **Electric vehicle (EV) charging stations (ECS)-power allocation method.** The power allocation method may be used as an alternative to the requirements in Section 5.106.5.3.1, Section 5.106.5.3.2 and associated Table 5.106.5.3.1. Use Table 5.106.5.3.6 (provided below as **Table 5.2-F – CALGreen Code Electric Vehicle Charging Stations Power Allocation Method**) to determine total power in kVA required based on the total number of actual parking spaces. Power allocation method shall include the following:
    1. Use any kVA combination capable spaces, low power Lever 2, Level 2 or DCFC EVSEs.
    2. At least one Level 2 EVSE shall be provided.

Table 5.2-F – CALGreen Code Electric Vehicle Charging Stations Power Allocation Method

Total Number of Actual Parking Spaces	Minimum Total kVA @ 6.6 kVA	Total KVA Required in Any Combination of EV Capable [3,4] Low Power level 2, Level 2,[1,2] Or DCFC
0-9	0	0
10-25	26.4	26.4
26-50	52.8	52.8
51-75	85.8	85.8
76-100	112.2	112.2
101-150	165	165
151-200	231	231
201 and over	20 percent of total actual spaces x 6.6	Total required kVA = P x .20 x 6.6 Where P = parking spaces in facility

Source: CBSC; Table 5.106.5.2
Notes:
1. Level 2 EVSE @ 6.6 kVA minimum.
2. At least one Level 2 EVSE shall be provided.
3. Maximum allowed kVA to be utilized for EV capable spaces is 75 percent.
4. If EV capable spaces are utilized, they shall meet the requirements of Section 5.106.5.3.1 EV capable spaces.

- **Filters.** In mechanically ventilated buildings, provide regularly occupied areas of the building with air filtration media for outside and return air that provides at least a Minimum Efficiency Reporting Value (MERV) of 13. Specified filters shall be installed prior to occupancy, and recommendations for maintenance with filters of the same value shall be included in the operation and maintenance manual.

The next iteration of the CALGreen Code goes into effect on January 1, 2026 and the Project would be subject to the CALGreen Code in effect at the time that the building permits are issued.

Regional

South Coast Air Quality Management District

The 1977 Lewis Air Quality Management Act merged four air pollution control districts to create the South Coast AQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and Federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The South Coast AQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

The South Coast AQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers an area of 6,745 square miles and is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south. The South Coast Air Basin includes all of Orange County and the

non-desert portions of Los Angeles, Riverside (which includes the City of Perris), and San Bernardino counties. The South Coast AQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. The South Coast AQMD has developed a variety of plans and rules aiming to improve air quality within the South Coast Air Basin, as discussed below.[1]

Air Quality Management Plan (AQMP)

All areas designated as non-attainment under the California Clean Air Act are required to prepare plans showing how they will meet the air quality standards. The South Coast AQMD prepares the AQMP to address Federal Clean Air Act and California Clean Air Act requirements by identifying policies and control measures.

The South Coast AQMD adopted an updated AQMP in December 2022. The 2022 AQMP builds upon measures already in place from previous AQMPs to meet various ozone and PM-2.5 standards. It includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO_X technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other Clean Air Act measures to achieve the 2015 8-hour ozone standard of 70 parts per billion (ppb). (AQMD 2022, p. ES-2.)

The 2022 AQMP includes a total of 49 control measures: 31 control measures target stationary sources and are categorized into four groups (NO_X Control Measures, Co-Benefits from Climate and Energy Programs, Limited Strategic VOC Measures and Other Measures; and the remaining 18 control measures target mobile sources and are facility-based mobile source measures, emission reductions from incentive programs, and partnerships with local, State, Federal, and international entities. (AQMD 2022, pp. ES-7 – ES-8.)

The NO_X measures are further grouped by residential, commercial, and large industrial combustion. Many control measures focus on widespread deployment of zero emission (ZE) and low NO_X technologies through a combination of regulatory approaches and incentives and will require technology assessments to better understand where and when ZE and low NO_X technologies can be implemented. (AQMD 2022, p. ES-7.)

The 2022 AQMP utilizes the population and growth estimates compiled by the Southern California Association of Governments (SCAG) in their 2020 Regional Transportation Plan/Sustainable Community Strategy, known as Connect SoCal, as a basis for the future emissions forecasts. (AQMD 2022, p. 3-22.)

SCAG's population and employment projections are based on the City's growth projections provided by cities, including from cities' general plans. (SCAG 2024, p. 47.) Should a project demonstrate compliance with local land use plans and/or population projections, then the AQMP would have taken into account such uses when it was developed, and the project would not conflict with implementation of such a plan.

Rule 220

South Coast AQMD Rule 220 gives the Executive Officer the power to exempt a source from prohibitions outlined in South Coast AQMD Regulations IV and XI, Prohibitions and Source Specific Standards respectively, if they can make the finding that the installation of controls and/or process changes

[1] South Coast AQMD Rulebook can be accessed at: http://www.aqmd.gov/home/regulations/rules/scaqmd-rule-book.

required to achieve compliance with the subject prohibitory rule will result in a net adverse impact on air quality. One of the conditions of the permits on exemptions issued under Rule 220 is that alternative controls and/or process changes which will result in the greatest practical net emission reduction be included for project operation.

Rule 402

South Coast AQMD Rule 402 (Nuisance) prohibits the discharge of air contaminants in such quantities that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, but does not apply to odors emanating from agricultural operations necessary for growing of crops or the raising of fowl or animals.

Rule 403

The Project would be required to comply with existing South Coast AQMD rules for the reduction of fugitive dust emissions. South Coast AQMD Rule 403 establishes these procedures. The potential requirements include the application of water or chemical stabilizers to disturbed soils at least twice a day, covering all haul vehicles before transport of materials, restricting vehicle speeds on unpaved roads to 15 mph, and sweeping loose dirt from paved site access roadways used by construction vehicles. In addition, it is required to establish a vegetative ground cover on disturbance areas that are inactive within 30 days after active operations have ceased. Alternatively, an application of dust suppressants can be applied in sufficient quantity and frequency to maintain a stable surface. Rule 403 also requires grading and excavation activities to cease when winds exceed 25 mph.

Rule 481

South Coast AQMD Rule 481 applies to all spray painting and spray coating operations and equipment and requires all spray coating equipment to be (1) operated inside an approved control enclosure, (2) applied using high velocity-low pressure (HVLP), electrostatic and/or airless spray equipment, or (3) applied using an alternative method which has an equal effectiveness to either of the two approved methods.

Rule 1108

South Coast AQMD Rule 1108 applies to cutback and emulsified asphalt used at project sites.

Rule 1143

South Coast AQMD Rule 1143 aims to reduce emissions of VOC from the use, storage, and disposal of consumer paint thinners and multi-purpose solvents commonly used in thinning of coating materials, cleaning of coating application equipment and other solvent cleaning operations by limiting their VOC content. Additionally, Rule 1143 requires several best management practices to reduce VOC during use and application of paint thinners and other solvents. For example, this Rule requires containers to be closed when not in use. This Rule also establishes requirements for appropriate labelling and disclosure of contents for containers and storage areas of these corrosive, flammable substances.

Rule 1186

South Coast AQMD Rule 1186 is intended to reduce the amount of particulate matter entrained in the ambient air as a result of vehicular traffic on paved and unpaved public roads, and at livestock operations. This includes requirements for local governments that contract for street sweeping services to utilize only certified street sweeping equipment.

Rule 1113

South Coast AQMD Rule 1113 governs the sale of architectural coatings and limits the volatile organic content (VOC) content in paints and paint solvents. This rule will dictate the VOC content of paints available for use during the construction of the buildings.

Rule 1303

South Coast AQMD Rule 1303 prohibits issuance of permits for any relocation or for any new or modified source which results in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia unless a best available control technology (BACT) is employed for the new or relocated source as specified by the Clean Air Act or other regulations.

Rule 1405

South Coast AQMD Rule 1405 requires the control of Ethylene Oxide emissions from sterilization and related operations and the collection of information from warehouses receiving materials sterilized with Ethylene Oxide. For the latter, warehouse operators are required to provide records and emissions data through fenceline monitoring or emissions studies to help assess Ethylene Oxide emissions from warehouses. If sterilization activities or related operations involving the storage or transport of materials sterilized with Ethylene Oxide are intended to occur at the proposed warehouse site, such activities would be subject to the requirements of Rule 1405.

Rule 2305

South Coast AQMD Rule 2305, the Warehouse Indirect Source Rule, requires the owners and operators of warehouses greater than 100,000 square feet to directly reduce NO_x and particulate matter emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities. The warehouse rule is a menu-based points system requiring warehouse operators to annually earn a specified number of points. These points can be earned by completing actions from a menu that can include acquiring and using natural gas, Near-Zero Emissions and/or Zero-Emissions on-road trucks, zero-emission cargo handling equipment, solar panels or zero-emission charging and fueling infrastructure, or other options. The South Coast AQMD expects this rule to reduce emissions from warehouse uses by 10-15 percent. When developed, the proposed warehouse would be subject to this rule, thus further reducing the emissions of the proposed Project.

Other Regulations

Also, some statewide regulations proposed to reduce one form of pollutant have the added benefit of reducing other forms of pollution. For example, when CARB approved the Heavy-Duty Vehicle Greenhouse Gas Reduction Measure in 2008 and the most recent amendments in December 2014 to reduce greenhouse gas emissions from heavy-duty trucks, it also reduces NO_X emissions. This measure requires a compliance schedule for trucks to be certified under the U.S. EPA SmartWay Program, which reduces fuel consumption by improving fuel efficiency through improvements to tractor and trailer aerodynamics and low-rolling resistance tires.

On February 1, 2005, a requirement limiting the idling of diesel-fueled commercial vehicles to five minutes at any location pursuant to Section 2485 of Chapter 10 within Title 13 of the California Code of Regulations was adopted. Similarly, Section 2449 prohibits construction equipment and truck idling times shall be prohibited in excess of five minutes on site.

Off-road diesel vehicles are also regulated under CARB for both in-use (existing) and new engines. Off-road diesel vehicles include construction equipment. There have been four sets of off-road standards

implemented by CARB, known as Tiers. Tier 1 standards began in 1996. Tiers 2 and 3 were adopted in 2000 and were more stringent than the first tier. Tier 2 and 3 standards were completely phased in by 2006 and 2008, respectively. In December 2004, CARB adopted the Tier 4 or fourth phase of emission standards for late model year engines. These emission standards are nearly identical to those finalized by the U.S. EPA in May 2004. These standards, which commenced in 2011, are estimated to decrease atmospheric particulate matter and NO_X emissions by 90 percent below pre-2011 levels.

Since most off-road vehicles today have no emission controls and can last 30 years or longer, CARB approved a regulation in 2007 to reduce emissions from existing off-road diesel vehicles used in construction and other industries. This regulation establishes emission rates targets that decline over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. The regulation took effect on the larger fleets first, with average compliance dates in 2010, while medium and small fleet requirements achieved compliance in 2013 and 2015, respectively. This regulation also includes the Surplus Off-Road Opt-in for NO_X (SOON) program. The local air districts may opt into the SOON program to reduce NO_X emissions beyond what is required by the regulation. Staff at the South Coast AQMD proposed Rule 2449 which would implement the SOON program. This rule was adopted by the South Coast AQMD in 2008. Opting into this program was anticipated to achieve a 12 ton per day reduction in NO_X by 2014.

Local Regulations

City of Perris Comprehensive General Plan 2030

The following are applicable goals, measures and policies from the City of Perris Comprehensive General Plan 2030 related to a sustainable community and by extension to air quality. In the City of Perris General Plan, the South Coast AQMD is referred to as the SCAQMD.

Conservation Element

Goal VIII	Create a vision for energy and resource conservation and the use of green building design for the City, to protect the environment, improve quality of life, and promote sustainable practices.
Policy VIII.A	Adopt and maintain development regulations that encourage water and resource conservation.
Measure VIII.A.2	Use indigenous and/or drought-resistant planting and efficient irrigation systems with smart controls in all new refurbished commercial and industrial development projects. Also, restrict use of turf to 25 percent or less of the landscaped areas.
Measure VIII.A.4	Use gray water, and water conserving appliances and fixtures within all new commercial and industrial developments.
Measure VIII.A.5	Use permeable paving materials within developments to deter water runoff and promote natural filtering of precipitation and irrigation waters.
Measure VIII.A.7	Create and maintain reclaimed water systems to provide reclaimed water for irrigation of municipal and commercial landscaping.
Measure VIII.A.8	Explore the use of private water well systems for all potable and/or landscaping water use for larger commercial and industrial projects.
Policy VIII.B	Adopt and maintain development regulations that encourage recycling and reduced waste generation by construction projects.

Measure VIII.B.1	Initiate and maintain incentive programs to encourage and reward developments that employ energy and resource conservation and green building practices similar to the City's current recycling program.
Measure VIII.B.3	Require the installation of recycling bins and provide space for storage and collection of recyclables within development sites.
Goal IX	Encourage project designs that support the use of alternative transportation facilities.
Policy IX.A	Encourage land uses and new development that support alternatives to the single occupant vehicle.
Measure IX.A.1	Encourage installation of shared vehicle parking and support facilities within new and refurbished commercial and industrial developments, i.e., dual fuel vehicles and charging systems on-site, carpool parking, and bus stop shelters.
Measure IX.A.2	Install bicycle paths and create secure and accessible bicycle storage for visitors and occupants within new and refurbished commercial and industrial developments.
Measure IX.A.4	Encourage building and site designs that facilitate pedestrian activity, such as locating buildings close to the street and providing direct connections to public walkways and neighboring land uses.
Measure IX.A.5	The City shall require all new public and private development to include bike and walking paths wherever feasible.
Goal X	Encourage improved energy performance standards above and beyond the California Title 24 requirements.
Policy X.A	Establish density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who exceed current Title 24 requirements for new development.
Policy X.B	Encourage the use of trees within project design to lessen energy needs, reduce the urban heat island effect, and improve air quality throughout the region.
Policy X.C	Encourage strategic shape and placement of new structures within new commercial and industrial projects.
Measure X.C.1	Promote energy conservation by taking advantage of natural site features such as natural lighting and ventilation, sunlight, shade and topography during the site plan process.
Measure X.C.2	When possible, locate driveways and parking on the east and north sides of buildings to reduce heat buildup during hot afternoons.

Healthy Community Element

Goal HC-2	Community Design – Facilitate local efforts to improve the opportunities and choices for a healthy and active lifestyle.
Policy HC 2.6	Encourage land use and urban design to promote physical activity, provide access to nutritious foods, and reduce air pollution.
Goal HC-6	Healthy Environment – Support efforts of local businesses and regional agencies to improve the health of our region's environment.

Policy HC 6.1 Support regional efforts to improve air quality through energy efficient technology, use of alternative fuels, and land use and transportation planning.

Policy HC 6.2 Support regional water quality efforts that balance water conservation, use of recycled water, and best practices in watershed management.

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

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

Environmental Justice Element

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

Goal 3.1 Policy Continue to ensure new development is compatible with the surrounding uses by co-locating compatible uses and using physical barriers, geographic features, roadways or other infrastructure to separate less compatible uses. When this is not possible, impacts may be mitigated using: noise barriers, building insulation, sound buffers, traffic diversion.

Goal 3.1 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, day-care centers, schools, and nursing homes from air pollution, noise lighting, and traffic associated with large warehouses, making them a "good neighbor."

Goal 3.2 A community that actively works to reduce the impacts of poor air quality.

Goal 3.2 Policy Participate in air quality planning efforts with local, regional, and State agencies that improve local air quality to protect human health, minimize the disproportionate impacts on sensitive population groups, and ensure that City concerns are resolved early in the process.

Goal 3.2 Policy Inform existing industries of the state 5-minute maximum idling limitation and condition new industrial projects to enforce the state's 5-minute maximum idling limitation for stationary diesel trucks.

Perris Municipal Code

The Perris Municipal Code does not contain provisions relevant to air quality.

Perris Good Neighbor Guidelines

The City of Perris adopted the Good Neighbor Guidelines for Siting New and/or Modified Industrial Facilities in September 2022 that aim to balance economic growth, industrial development, and business success while implementing methods for the reduction of potential negative impacts on sensitive receptors. The Perris Good Neighbor Guidelines goals and recommended policies formalize what is expected from industrial development, particularly those closer to sensitive receptors. The applications for the proposed Project were submitted before the Perris Good Neighbor Guidelines were adopted by the City of Perris City Council and, as such, the Perris Good Neighbor Guidelines are not applicable to the Project.

PVCCSP Standards and Guidelines and PVCCSP EIR Mitigation Measures

There are no specific standards or guidelines related to air quality identified within the PVCCSP. However, the PVCCSP EIR includes various mitigation measures to ensure that Projects located within the PVCCSP planning area identify air quality impacts from construction and operation and mitigate any potential impacts appropriately. Project-specific and relevant mitigation measures from the PVCCSP EIR which address both potential regional and local air quality impacts are included under Section 5.2.5. In the PVCCSP EIR, the South Coast AQMD is referred to as the SCAQMD.

By preparing this analysis, the Project has complied with the following applicable PVCCSP EIR mitigation measures:

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

MM Air 10 To identify potential implementing development project-specific impacts resulting from operational activities, proposed development projects that are subject to CEQA shall have long-term operational-related air quality impacts analyzed using the latest available URBEMIS model, or other analytical method determined by the City of Perris as lead agency in conjunction with the SCAQMD. The results of the operational-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Threshold analysis, CO Hot Spot analysis, or other appropriate analyses as determined by the City of Perris in conjunction with SCAQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.

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

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

Coordination with the RTA as required by PVCCSP EIR mitigation measure **MM Air 18** has been completed. In an email dated July 2, 2025, the RTA indicated that a bus stop is not required at the Project site.

The PVCCSP EIR included the following mitigation measures to be implemented to reduce emissions for construction activities at development sites within the PVCCSP planning area:

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

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

- requiring the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain),
- keeping disturbed/loose soil moist at all times,
- requiring trucks entering or leaving the site hauling dirt, sand, or soil, or other loose materials on public roads to be covered,
- installation of wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip,
- posting and enforcement of traffic speed limits of 15 miles per hour or less on all unpaved potions of the project site,
- suspending all excavating and grading operations when wind gusts (as instantaneous gust) exceed 25 miles per hour,
- appointment of a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM-10 generation,
- sweeping streets at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks when sweeping streets to remove visible soil materials,
- replacement of ground cover in disturbed areas as quickly as possible.

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

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

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

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

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

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

The PVCCSP EIR included mitigation measures in order to reduce emissions from operation by new implementing development projects within the PVCC area. The following PVCCSP EIR mitigation measures are applicable to new warehouse projects:

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

MM Air 12 Where transport refrigeration units (TRUs) are in use, electrical hookups will be installed at all loading and unloading stalls in order to allow TRUs with electric standby capabilities to use them.

MM Air 13 In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD's Carl Moyer Program, or other state programs that restrict operations to "clean" trucks, such as 2007 or newer model year or 2010 compliant vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year would be used at a facility with three or more dock-high doors, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP [On-road Heavy Duty Voucher Incentive Program], HVIP [Hybrid and Zero- Emission Truck and Bus Voucher Incentive Project], and SOON [Surplus Off-Road Opt-in for NOX] funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants would be required to use those funds, if awarded.

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

MM Air 19 In order to reduce energy consumption from the individual implementing development projects, applicable plans (e.g., electrical plans, improvement maps) submitted to the City shall include the installation of energy-efficient street lighting throughout the Project

site. These plans shall be reviewed and approved by the applicable City Department (e.g., City of Perris' Building Division) prior to conveyance of applicable streets**.**

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

5.2.3 Design Considerations

Design considerations refer to ways in which the proposed Project would reduce potential impacts to air quality. The PVCCSP includes Standards and Guidelines relevant to the analysis of air quality impacts which are summarized below and are incorporated as part of the proposed Project; as such, they are assumed in the analysis presented in this section. The Project would meet or exceed all applicable standards under the CALGreen Code and the Building Energy Efficiency Standards contained in Title 24 in effect at the time that the building permits are issued. The Project is proposed to implement concepts of efficient design and material use that are consistent with Silver LEED Certification Levels. This would be accomplished by incorporating, at a minimum, the following sustainability features or other features that are equally efficient:

Energy Efficiency

- Design building shells and components, such as windows, roof systems and electrical systems to meet California Title 24 Standards for nonresidential buildings.

- Design buildings to achieve U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) features for potential certification. This includes design considerations related to the building envelope, heating, ventilation, and air conditioning (HVAC), lighting, and power systems. Additionally, architectural expressions, such as roofs and windows in the buildings would relate to conserving energy.

- Install energy efficient light-emitting diodes (LED) lighting on the site. Provide skylights for natural daylight to reduce the lighting load, therefore saving energy. Lighting would incorporate motion sensors that turn them off when not in use.

- Meet City minimum landscape requirements and provide adequate landscape shade for the site to reduce energy use.

- Install light-colored roofing materials over office area spaces and light-colored paving materials.

- For future office space, install energy efficient HVAC systems (seasonal energy efficiency ratio (SEER) 13), appliances and equipment, and control systems that are Energy Star rated.

- For future office improvement, refrigerants and HVAC equipment would be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global climate change. Ventilation and HVAC systems would be designed to meet or exceed the minimum outdoor air ventilation rates described in the American Society of Heating, Refrigeration, and Air Conditioning Engineers standards and/or per California Title 24 requirements.

- Incorporate Energy Star rated space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.

Water Conservation and Efficiency

- Surface parking lots would be landscaped in accordance with City standards to reduce heat island effect.

- Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls and sensors for landscaping according to the California Department of Water Resources Model Efficient Landscape Ordinance and Chapter 19.70 (Landscaping) of the Perris Municipal Code.

- Design buildings to be water-efficient. Install water-efficient fixtures in accordance with Section 5.303 of the California Green Building Standards Code Part 11.

- Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff in accordance with City Standards.

- Provide education about water conservation and available programs and incentives to the building operators to distribute to employees.

Solid Waste Measures

- Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1 of the California Green Building Standards Code Part 11.

- Provide storage areas for recyclables and green waste and adequate recycling containers located in readily accessible areas in accordance with Section 5.410.1 of the California Green Building Standards Code Part 11.

- The property operator would provide readily available information provided by the City for employee education about reducing waste and available recycling services.

Transportation and Motor Vehicles

- Limit idling time for commercial vehicles to no more than five minutes per Title 13 of the California Code of Regulations, Section 2485.

- Provide electric vehicle (EV) infrastructure and facilitate EV charging in accordance with Section 5.106.5.3, Electric Vehicle Charging Requirements, of the California Green Building Standards Code Part 11. Accordingly, the Project would provide a minimum of 35 EV-capable parking spaces and at least 12 of these spaces would be equipped with EV charging stations at Project opening.[2]

[2] These numbers are based on the current requirements of Section 5.106.5.3.1 of the 2022 CALGreen Code. The 2025 CALGreen Code takes effect on January 1, 2026 and the Project would need to provide at least 18 spaces with EV chargers at the time of opening if its building permits are approved after 2025.

- Signage shall be posted onsite directing truck drivers to use existing City truck routes on Harley Knox Boulevard.

- Provide Class II bike lanes on Harley Knox Boulevard, within the Project's frontage, per the City's Active Transportation Plan.

- Provide adequate bicycle parking near building entrances to promote cyclist safety, security, and convenience in compliance with Section 5.106.4 of the California Green Building Standards Code Part 11 and standard City code requirements.

Onsite Equipment and Loading Docks

- The Project owner would inform building operators of existing requirements to turn off equipment, including heavy-duty equipment, motor vehicles, and portable equipment, when not in use for more than 5 minutes. Truck idling shall not exceed 5 minutes in time. All facilities would post signs (both interior and exterior facing signs, including signs directed at all dock and delivery areas) requiring that trucks shall not be left idling for more than 5 minutes pursuant to Title 13 of the California Code of Regulations, Section 2485, which limits idle times to not more than five minutes and to report violations to California Air Resources Board, the South Coast Air Quality Management District, and the building manager.

- Service equipment (i.e., yard trucks and forklifts) used within the site shall be electric with the necessary electrical charging stations provided or powered by other alternative technology.

Construction

- Require Construction Equipment to Turn Off When Not in Use per Title 13 of the California Code of Regulations, Section 2449.

- Use regionally produced and/or manufactured building materials, where feasible, for Project construction.

- Use "green" building materials where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way.

5.2.4 Comments Received in Response to the Notice of Preparation

One comment letter was received related to air quality in response to the Notice of Preparation. The comment letter was received from the South Coast AQMD. The comment letter is identified in **Table 2.0 A – Written Comments Received During the Notice of Preparation Comment Period** and included in its entirety in Appendix A of this Draft EIR.

Four verbal comments were also received during the June 18, 2025, Draft EIR public scoping meeting. The verbal comments received are summarized in **Table 2.0-B – Verbal Comments Received During the Draft EIR Scoping Meeting**. All air quality related comments are addressed in this Section.

5.2.5 Thresholds of Significance

The City of Perris has not established local CEQA significance thresholds and defers to the thresholds of significance identified in Appendix G of the *CEQA Guidelines*.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project would have a less than significant impact in the following area and this topic is not addressed in this Draft EIR:

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

As identified in the Initial Study prepared for this Project, implementation of the proposed Project could have potentially significant impacts in the following areas and these topics are addressed in this Draft EIR:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors); and
- Expose sensitive receptors to substantial pollutant concentrations.

5.2.6 Environmental Impacts before Mitigation

Threshold A: *Would the Project conflict with or obstructing of implementation of the applicable air quality plan?*

The AQMP for the South Coast Air Basin sets forth a comprehensive program designed to bring the South Coast Air Basin into compliance with all Federal and State air quality standards. The control measures and related emission reduction estimates included in the AQMP are based on emissions projections for a future development scenario derived from land use, population, and employment estimates defined in consultation with local governments. To do this, the AQMP utilizes the population and growth estimates compiled by SCAG in Connect SoCal. (AQMD 2022.) As stated previously, SCAG's population and employment projections for the City are based on the City's growth projections (SCAG 2020), which are outlined in the City of Perris General Plan 2030. Thus, since the 2022 AQMP is consistent with Connect SoCal, the 2022 AQMP is also consistent with the growth assumptions in the City of Perris General Plan 2030. Accordingly, if a project demonstrates compliance with local land use plans and/or population projections, then the AQMP would have taken into account such uses when it was developed and the Project would not conflict with implementation of such a plan.

The Project site is located within the PVCC area of the City of Perris. The Project site has a PVCCSP land use designation of General Industrial (GI). The Project Applicant proposes a speculative high-cube, non-refrigerated warehouse/distribution center, a permitted use under the GI PVCCSP land use designation. Therefore, this land use and associated air quality emissions would have been accounted for in the 2022 AQMP.

The City of Perris General Plan 2030 EIR also considered urbanization of land, in general, will have a growth inducing impact and found that development consistent with the City of Perris General Plan 2030 reflects the logical, geographic expansion of development within western Riverside County. Thus, the Project is consistent with other development within the PVCC area in the Project vicinity and is not inconsistent with the land uses assumed in their growth forecasts. As such, the Project would not induce unplanned growth.

Consistency with the 2022 AQMP is also a function of consistency with applicable AQMP control measures. The AQMP includes specific control measures to reduce air pollutant emissions in order to meet Federal and State air quality standards. The control measures contained within the 2022 AQMP will still apply to new development, and through this compliance, the future development on the Project parcels would not obstruct implementation of the 2022 AQMP. Such control measures include, for example, Title 24 energy code requirements and building electrification that can also help reduce NO_X emissions and a CARB proposed statewide zero greenhouse gas emissions standard for residential and commercial building appliances, which would have criteria pollutant co-benefits. The South Coast AQMD has also developed multiple building-related control measures to address emissions from residential and commercial combustion equipment for space heating, water heating, cooking, and others. Moreover, the mobile source control measures in the 2022 AQMP focus on widespread deployment of zero-emission and low NO_X technologies through a combination of regulatory approaches and incentives including partnerships with local, State, Federal, and international entities. (AQMD 2022, p. ES-7.) The control measures are implemented by applicable agencies and the development that would result from the proposed Project would be subject to all applicable measures. Therefore, because the proposed Project is compliant with local and use plans and growth projections, the proposed Project would not conflict with or obstruct implementation of the 2022 AQMP. The impact would be **less than significant and no mitigation is required**.

Threshold B: *Would the Project 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?*

As previously shown in **Table 5.2-D**, the portion of the South Coast Air Basin within which the Project site is located is designated as a non-attainment area for PM-10 under State standards and for ozone and PM-2.5 under both State and Federal Standards. Ozone is not directly emitted into the atmosphere; rather, it forms via a reaction of VOC and NO_X in the atmosphere. Therefore, in evaluating this threshold it is also important to consider these emissions and their potential to contribute to ozone pollution in the region even if the region is not in non-attainment for these constituent pollutants.

The South Coast AQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same. Therefore, projects that exceed project-specific significance thresholds are considered by the South Coast AQMD to be cumulatively considerable. (AQMD 2003b) Based on the South Coast AQMD's regulatory jurisdiction over regional air quality, it is reasonable to rely on its thresholds to determine whether there is a cumulative air quality impact.

Air quality impacts can be divided into short-term and long-term impacts. Short-term impacts are usually related to construction and grading activities. Long-term impacts are usually associated with build-out conditions and long-term operations of a project. Both short-term and long-term air quality impacts can be analyzed on a regional and localized level. Regional air quality thresholds examine the effect of project emissions on the air quality of the South Coast Air Basin, while localized air quality impacts examine the effect of project emissions on the neighborhood around the Project site. The following information was derived from the Air Quality/Greenhouse Gas Analysis which is found in Appendix B of this Draft EIR.

The construction and operation analysis was performed using CalEEMod, the official statewide land use computer model designed to provide a uniform platform for estimating potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations of land use projects

under CEQA. The model quantifies direct emissions from construction and operations (including vehicle use), as well as indirect emissions, such as emissions from energy use. The mobile source emission factors used in the model, EMFAC2021, includes the Pavley standards and Low Carbon Fuel standards into the mobile source emission factors. The model also identifies Project design features, regulatory measures, and mitigation measures to reduce criteria pollutant and GHG emissions along with calculating the benefits achieved from the selected measures.

South Coast AQMD's Regional Significance Thresholds Analysis

The thresholds shown in **Table 5.2-G – South Coast AQMD CEQA Regional Significance Thresholds** below are from the South Coast AQMD's Air Quality Significance Thresholds document (AQMD 2023) and are the standard regional thresholds for determining significance under CEQA sanctioned by the South Coast AQMD. These regional significance thresholds were developed by the South Coast AQMD based on the estimated daily emissions of a major stationary source.

Table 5.2-G – South Coast AQMD CEQA Regional Significance Thresholds

Development Phase	Units	VOC	NO_x	CO	SO_x	PM-10	PM-2.5
Construction	lbs/day	75	100	550	150	150	55
Operations	lbs/day	55	55	550	150	150	55

Short-Term Impacts – Regional Significance Thresholds Analysis

Short-term emissions associated with construction of the Project would consist of fugitive dust and other particulate matter, as well as exhaust emissions generated by construction-related equipment and vehicles. Short-term impacts would also include emissions generated during construction as a result of operation of personal vehicles by construction workers, asphalt degassing, and architectural coating (painting) operations.

Project-related short-term emissions were evaluated using CalEEMod. The model evaluated emissions resulting from site preparation, grading, building construction, paving, and architectural coating. The total construction period is expected to require approximately eleven and a half months. For the purposes of the Air Quality/Greenhouse Gas Analysis, construction of the Project was modeled starting in June 2025 which represents a worst-case analysis.[3] The default parameters within CalEEMod were used and these default values reflect a worst-case scenario, which means that Project emissions are expected to be equal to or less than the estimated construction emissions. In addition to the default values used, the following assumptions relevant to construction were used to model short-term construction emissions:

- The equipment to be used for each activity is based on CalEEMod defaults and the Project applicant. Each piece of equipment is assumed to operate eight (8) hours per day:
- To evaluate Project compliance with South Coast AQMD Rule 403 for fugitive dust control, the Project would utilize the mitigation option of watering the Project site three times daily which achieves a control efficiency of 61 percent for PM-10 and PM-2.5 emissions. Two (2) one-way

[3] The construction schedule utilized in this analysis represents a "worst-case" analysis should construction occur any time after the respective dates. This is because emission factors for construction decrease over time as the analysis year increases as a result of emissions regulations becoming more stringent.

vendor trips were specifically included during grading and paving activities to account for water truck trips.

- Vendor trips from concrete trucks utilized during building construction were based on CalEEMod defaults.
- The VOC content of interior and exterior architectural coatings were changed to 50 grams per liter, pursuant to South Coast AQMD Rule 1113.
- The Project site earthwork quantities would balance; no soil import or export is required.
- Off-site infrastructure improvements would also be required to connect potable water, sewer and storm drain lines to existing facilities in Harley Knox Boulevard and Indian Avenue, and construct sidewalk and parkway improvements along the Project frontage. The off-site improvements would disturb approximately 1.37 acres.

The construction equipment estimated to be used for each activity is identified in the Air Quality/Greenhouse Gas Analysis. **Table 5.2-H – Estimated Daily Regional Construction Emissions** summarizes the estimated construction emissions.

Table 5.2-H – Estimated Daily Regional Construction Emissions

Activity	Peak Daily Emissions (lbs/day)					
	VOC	NO_x	CO	SO_2	PM-10	PM-2.5
South Coast AQMD Daily Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
2025	3.39	31.80	32.90	0.06	6.72	3.94
2026	93.00	19.50	41.90	0.06	5.15	1.68
Exceeds Threshold?	**Yes**	**No**	**No**	**No**	**No**	**No**

Source: WEBB-A, Table 2.
Notes: Numbers are the maximum of summer or winter emissions in a given year and may not match due to rounding within the model.

Evaluation of **Table 5.2-H** indicates that criteria pollutant emissions from construction activities would not exceed any of the South Coast AQMD regional daily thresholds during Project construction, except for the South Coast AQMD regional daily threshold for VOC resulting from architectural coatings (painting). Implementation of PVCCSP EIR mitigation measure **MM Air 9** would reduce VOC emissions associated with architectural coating. Please see the discussion under the headings *Regional Significance Thresholds Analysis Conclusion*, below and **Table 5.2-N – Mitigated Estimated Daily Construction Emissions**, for impacts after implementation of mitigation.

Long-Term Impacts – Regional Significance Thresholds Analysis
Long-term emissions are evaluated for Project buildout. The Project is assumed to be operational in 2026. Mobile emissions refer to on-road motor vehicle emissions at Project buildout, which include passenger vehicles and delivery trucks. These emissions are estimated by using the trip generation rates provided in the *First Industrial Logistics at Harley Knox and Indian Traffic Study,* Appendix H. Additionally, an average truck trip length of approximately 40 miles was assumed, which is recommended by the City and based on South Coast AQMD's *Final Staff Report for Proposed Rule*

2305 and Rule 316.[4]. On-site service equipment (i.e., forklifts and yard trucks) are assumed to be electric and therefore do not have any direct emissions of criteria pollutants.

Area source emissions from the Project include stationary combustion emissions of natural gas used for space and water heating (shown in a separate row as energy), yard and landscape maintenance, and an average building square footage to be repainted each year. CalEEMod computes area source emissions based upon default factors and land use assumptions. CalEEMod defaults were used and reflect 2019 Title 24 standards. However, it should be noted the most recent 2022 Title 24 standards became effective in January 2023 and apply to this Project and therefore the Project's emissions are overstated. Stationary source emissions from the Project include a diesel-powered fire water pump. The fire water pump is anticipated to be 100 horsepower and the analysis assumes it could potentially operate for up to one hour per day, one day per week, with a maximum annual operation of 50 hours for routine maintenance and testing. Separate emissions were computed for both the summer and winter.

Project-related operational emissions were computed and the results are presented below in **Table 5.2-I – Estimated Daily Regional Project Operation Emissions (Summer)** and **Table 5.2-J – Estimated Daily Regional Project Operation Emissions (Winter)**.

Table 5.2-I – Estimated Daily Regional Project Operation Emissions (Summer)

Activity	Peak Daily Emissions (lb/day)					
	VOC	NO_x	CO	SO_2	PM-10	PM-2.5
South Coast AQMD Daily Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Area	16.50	0.20	23.90	0.00	0.04	0.03
Energy	0.16	2.82	2.37	0.02	0.21	0.21
Mobile	3.89	10.80	50.30	0.18	13.30	3.53
Stationary	0.16	0.46	0.60	0.00	0.02	0.02
Total	**20.71**	**14.28**	**77.17**	**0.20**	**13.57**	**3.79**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: WEBB-A, Table 3
Note: Emissions reported as zero are rounded and not necessarily equal to zero.

[4] South Coast Air Quality Management District, Board Meeting Agenda No. 27, May 7, 2021, Attachment I, Final Staff Report, Proposed Rule 2305 – Warehouse Indirect Source Rule - Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305. (Available at http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10, accessed January 2025.)

Table 5.2-J – Estimated Daily Regional Project Operation Emissions (Winter)

Activity	Peak Daily Emissions (lb/day)					
	VOC	NO_x	CO	SO_2	PM-10	PM-2.5
South Coast AQMD Daily Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Area	12.50	0.00	0.00	0.00	0.00	0.00
Energy	0.16	2.82	2.37	0.02	0.21	0.21
Mobile	3.66	11.40	41.50	0.17	13.30	3.53
Stationary	0.16	0.46	0.60	0.00	0.02	0.02
Total	**16.48**	**14.68**	**44.47**	**0.19**	**13.53**	**3.76**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: WEBB-A, Table 4
Note: Emissions reported as zero are rounded and not necessarily equal to zero.

Evaluation of the modeling results presented in the above table indicates that criteria pollutant emissions from operation of the proposed Project would not exceed the South Coast AQMD regional daily thresholds.

Regional Significance Thresholds Analysis Conclusion

Based on the Regional Significance Thresholds for the proposed Project, short-term emissions would exceed the daily regional significance thresholds established by the South Coast AQMD for VOC emissions before mitigation. No criteria pollutants would exceed the regional significance thresholds with the incorporation of mitigation measure PVCCSP EIR mitigation measure **MM Air 9**, described below, to reduce short-term Project construction VOC emissions. Although the remaining construction emissions would be below the South Coast AQMD daily construction significance thresholds, the Project would also be required to comply with PVCCSP EIR mitigation measures **MM Air 2** through **MM Air 8**. Please see the discussion under the headings *Regional Significance Thresholds Analysis Conclusion*, below and **Table 5.2-N – Mitigated Estimated Daily Regional Construction Emissions**, for impacts after implementation of mitigation.

The long-term operation of the Project would not exceed South Coast AQMD regional daily significance thresholds for any pollutant during summer or winter. Nevertheless, the Project would be required to comply with PVCCSP EIR mitigation measures **MM Air 11** through **MM Air 14** and **MM Air 19** through **MM Air 20**.

Conclusions

Based on the Regional Significance Thresholds analysis for the proposed Project, the short-term construction emissions would not exceed the daily regional significance thresholds with the incorporation of PVCCSP EIR mitigation measure **MM Air 9** to reduce short-term Project construction VOC emissions. Although the remaining construction emissions would be below the South Coast AQMD daily construction significance thresholds, the Project would also be required to comply with PVCCSP EIR mitigation measures **MM Air 2** through **MM Air 8**.

The long-term operation of the Project would not exceed South Coast AQMD daily regional significance thresholds for any pollutant during summer or winter. Nevertheless, the Project would be required to comply with PVCCSP EIR mitigation measures **MM Air 11** through **MM Air 14** and **MM Air 19** through **MM Air 20**.

As such, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment and no additional mitigation is required beyond those required by PVCCSP EIR mitigation measures listed above. Impacts would be **less than significant with implementation of mitigation**.

Threshold C: *Would the Project expose sensitive receptors to substantial pollutant concentration?*

As stated in *Section 5.2.1 – Setting*, above, sensitive receptors are people who are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, and individuals with pre-existing respiratory or cardiovascular illness. The closest sensitive receptors to the Project site are existing non-conforming residences southwest of the Project site.

The potential impact to sensitive receptors was evaluated in the following analyses: South Coast AQMD localized significance threshold analysis for criteria pollutants, CO "hot spot" analysis, mobile source health risk assessment for diesel particulate matter, health effects from criteria pollutants, as well as a discussion of disadvantaged communities. The results of these analyses contained, in part, in the Air Quality/Greenhouse Gas Analysis (WEBB-A), Diesel Particulate Matter Health Risk Assessment (WEBB-B), and Construction Health Risk Assessment (URBAN) are summarized below.

South Coast AQMD Localized Significance Threshold (LST) Analysis

As part of the South Coast AQMD's environmental justice program, staff at the South Coast AQMD developed localized significance threshold (LST) methodology (AQMD 2008b) that can be used by public agencies to determine whether or not a project may generate significant adverse localized air quality impacts (both short-term and long-term). LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable Federal or State ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area.

The pollutants analyzed under the LST methodology are CO, NO_X, PM-10, and PM-2.5. (AQMD 2008b.) Of these pollutants, the "attainment pollutants" (CO and NO_X) are derived using an air quality dispersion model to back-calculate the daily emissions that would cause or contribute to a violation in ambient air quality for the source receptor area within which the Project site is located (Source Receptor Area 24). The non-attainment PM-10 and PM-2.5 pollutant measurements are derived using an air quality dispersion model to back-calculate the emissions that would be necessary to worsen the existing violation in Source Receptor Area 24, using the allowable change in concentration thresholds approved by the South Coast AQMD. Therefore, the tabulated LSTs represent the maximum mass emissions from a project that would not cause or contribute to an exceedance of State or Federal ambient air quality standards for the above pollutants, and were developed based on ambient concentrations of these pollutants for each source receptor area in the South Coast Air Basin.

The localized assessment methodology limits the emissions in the analysis to those generated from on-site activities. The South Coast AQMD has provided LST screening tables to allow users to readily determine if the daily emissions for proposed construction or operational activities could result in significant localized air quality impacts for projects five acres or smaller. The LST screening tables can be used as a tool to determine if dispersion modeling would be necessary. The South Coast AQMD's Fact Sheet for Applying CalEEMod to Localized Significance Thresholds is used to determine the maximum site acreage that is actively disturbed based on the construction equipment fleet and

equipment hours as estimated in CalEEMod. Based on this South Coast AQMD guidance and the Project's equipment list during grading (see Air Quality/Greenhouse Gas Analysis), Project construction would disturb approximately four acres per day during grading. LST thresholds are provided for one-, two-, and five-acre sites. Therefore, the two-acre LST was used to compare the on-site emissions estimated by CalEEMod to provide a conservative analysis. This approach is conservative as it assumes that all on-site emissions associated with Project construction occur within a concentrated two-acre area. The same amount of emissions generated would be distributed over a larger surface area and would therefore result in a lower concentration at the nearest sensitive receptors. As such, the LST for the two-acre site provides a conservative, screening-level analysis.

The LST thresholds are estimated for each source receptor area using the maximum daily disturbed area (in acres) and the distance of the Project site to the nearest sensitive receptors (in meters). The closest sensitive receptor to the proposed Project construction site is the existing residential properties southwest of the Project site along Nevada Avenue, approximately 1,960 feet (597 meters) away. According to LST methodology, projects with boundaries farther than 500 meters to the nearest receptor should use the LSTs for receptors located at 500 meters. Therefore, a receptor distance of 500 meters (1,640 feet) was used to ensure a conservative analysis.

Short-Term LST Analysis

The results of the short-term LST analysis are summarized in **Table 5.2-K, LST Results for Construction Emissions**, below.

Table 5.2-K – LST Results for Construction Emissions

Activity	Peak Daily Emissions (lb/day)			
	NO_x	CO	PM-10	PM-2.5
LST for 2-acre site at 500 meters	**684**	**18,947**	**186**	**91**
Site Preparation 2025	**31.60**	**30.20**	**6.48**	**3.89**
Grading 2025	29.70	28.30	3.62	2.09
Building Construction 2025	11.30	14.10	0.47	0.43
Building Construction 2026	10.70	14.10	0.41	0.38
Paving 2026	3.56	4.97	0.16	0.15
Architectural Coatings 2026	1.14	1.51	0.03	0.03
Maximum[a]	**31.60**	**30.20**	**6.48**	**3.89**
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: WEBB-A, Table 5

Note: [a] Maximum emissions are the greater of either site preparation, grading or building construction in 2025 alone or the sum of building construction, paving, and architectural coating in 2026 since these activities overlap. Maximum emissions are shown in bold.

As indicated in the above table, Project-related short-term construction emissions would not exceed any of the South Coast AQMD-established LSTs for two-acre sites in Source Receptor Area 24.

Long-Term LST Analysis

According to the LST methodology, LSTs only apply to the operational phase if a project includes stationary sources or attracts mobile sources that may spend long periods of time idling at the site, such as warehouse/transfer facilities. The Project includes a stationary source (fire water pump) and would attract mobile sources (trucks). The Project applicant will be required to obtain a South Coast AQMD permit for the fire water pump. The South Coast AQMD permitting process would ensure that the Project

meets regulatory requirements through the application review process and by placing specific operating conditions on the permit such as operating hour limits. Nonetheless, an analysis of the fire water pump was prepared. Because the proposed Project would operate as a logistics center and has the potential to attract mobile sources that can reasonably be assumed will idle at the site, a long-term LST analysis was prepared for this Project. Although the Project site exceeds five acres, per the South Coast AQMD, the LST lookup tables can be used as a screening tool to determine if dispersion modeling would be necessary. Therefore, the Project's on-site emissions from CalEEMod and LST Look-Up Tables for the five-acre site were utilized as a screening-level analysis.

CalEEMod was utilized to estimate the Project's emissions from trucks traveling on the Project site. An on-site distance of 0.43 miles was conservatively assumed to be traveled for each one of the Project's truck trips identified in the Traffic Study prepared for the proposed Project (Appendix H of this Draft EIR). The output is attached to the Air Quality/Greenhouse Gas Analysis and summarized below. Idling emissions from trucks at loading docks is not available in CalEEMod; therefore, PM-10 and PM-2.5 idling emissions were calculated separately. Although PVCCSP EIR mitigation measure **MM Air 11** limits onsite idling to five minutes per truck per day, the analysis assumes an unmitigated scenario where each truck trip idles for 15-minutes per day, which conservatively overestimates idling emissions The analysis also quantified emissions from the Project's stationary sources; specifically the 100-horsepower diesel-powered fire water pump which is assumed to operate for up to one hour per day, one day per week, with a maximum annual operation of 50 hours for routine maintenance and testing. The results were added to the total PM-10 and PM-2.5 emissions from CalEEMod and presented in the table below. The closest sensitive receptors to the Project operations would be the existing residential properties southwest of the Project site along Nevada Avenue, approximately 1,960 feet (597 meters) away. Therefore, a receptor distance of 500 meters (1,640 feet) was used to ensure a conservative analysis. The results are summarized in **Table 5.2-L – LST Result for Operations Emissions**, below.

Table 5.2-L – LST Results for Operational Emissions

Activity	Peak Daily Emissions (lb/day)			
	NO_x	CO	PM-10[a]	PM-2.5[a]
5-Acre LST at 500 meters	**780**	**22,530**	**50**	**26**
On-Site Emissions	4.80	27.80	0.34	0.29
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: WEBB-A, Table 6.
Note: The greater of summer or winter emissions from CalEEMod is shown. Output attached herewith.
[a] Idling emissions added to CalEEMod output emissions.

Therefore, as indicated in the table above, Project-related long-term operational emissions would not exceed any South Coast AQMD operational LST for Source Receptor Area 24.

LST Analysis Conclusion

Based on the LST analysis, neither the short-term construction nor long-term operation of the Project would exceed South Coast AQMD LST at sensitive receptors within the Project vicinity for any criteria pollutants. No mitigation is required for LST impacts.

CO Hot Spots

In order to ensure that the State and Federal ambient air quality standards for carbon monoxide are not violated, the South Coast AQMD recommends that projects with a potential to generate heavy volumes of traffic, and which can lead to high levels of CO, use hot spot modeling to determine the potential to

create a CO "Hot Spot". A CO "hot spot" is a localized concentration of CO that is above the State or Federal 1-hour or 8-hour ambient air quality standards. Localized high levels of CO are associated with traffic congestion and idling or slow-moving vehicles. Based on the information presented below, a site-specific CO "hot spot" analysis is not needed to determine whether the addition of Project related traffic will contribute to an exceedance of either the State or Federal ambient air quality standards for CO emissions in the Project area.

The analysis prepared for CO attainment in the South Coast Air Basin by the South Coast AQMD can be used to assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the South Coast AQMD's 2003 AQMP and the Revised 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the South Coast Air Basin are generally due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. (2003 AQMP Appendix V, p. V-4-32.) Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans.

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Blvd. and Imperial Highway (Lynwood); Wilshire Blvd. and Veteran Ave. (Westwood); Sunset Blvd. and Highland Ave. (Hollywood); and La Cienega Blvd. and Century Blvd. (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated in the 1992 CO Plan and subsequent 2003 AQMP was that at Wilshire Blvd. and Veteran Ave., which has a daily traffic volume of approximately 100,000 vehicles per day. (2003 AQMP Appendix V, Table 4-7.) The Los Angeles County Metropolitan Transportation Authority (MTA) evaluated the LOS in the vicinity of the Wilshire Blvd./Veteran Ave. intersection and found it to be level E at peak morning traffic and Level F at peak afternoon traffic. (MTA, Exhibit 2-5 and 2-6.) This hot spot analysis was conducted at a time when ambient CO concentrations throughout the South Coast Air Basin were higher than today and at intersections subject to extremes in vehicle volumes and vehicle congestion. The hot spot analysis did not predict any violation of CO standards.

Considering existing traffic, plus cumulative traffic plus Project-related traffic, the *Traffic Study* prepared for this Project (Appendix H of this Draft EIR) calculated that that Project-related traffic would result in an increase of approximately 763 daily trips on local roadways, it can reasonably be concluded that Project-related traffic would not have daily traffic volumes exceeding those at the intersections modeled in the 2003 AQMP, nor would there be any reason unique to the meteorology to conclude that intersections affected by the Project would yield higher CO concentrations if modeled in detail. Thus, the Project would not result in CO hot spots.

Diesel Particulate Health Risks

Health risk assessments are commonly used to estimate the potential health risks to the surrounding community from projects that will be a source of diesel emissions and hence increase the amount of diesel particulate matter in the area. Those individuals who are sensitive to air pollution include children, the elderly, and persons with preexisting respiratory or cardiovascular illness. For purposes of CEQA, the South Coast AQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities. Commercial and industrial facilities are not included in the definition because employees do not typically remain onsite for 24 hours.

The CARB Air Quality and Land Use Handbook contains recommendations that will "help keep California's children and other vulnerable populations out of harm's way with respect to nearby sources of air pollution" (CARB 2005), including recommendations for distances between sensitive receptors and certain land uses. The CARB Air Quality and Land Use Handbook states that its recommendations are advisory and should not be interpreted as "buffer zones." CARB recognizes the opportunity for more detailed site-specific analyses and there is no "one size fits all" solution to land use planning. The CARB Air Quality and Land Use Handbook recommends avoiding siting new sensitive land uses within 1,000 feet of a distribution center. The proposed Project is a single warehouse building, which would result in an increase in the number of diesel trucks in the vicinity of the Project site. Furthermore, the closest sensitive receptors are the legal, non-conforming residential uses on properties that have PVCCSP land use designation of GI, located along Nevada Avenue, southwest of the Project site. Therefore, an operational health risk assessment (Diesel Particulate Matter HRA) was prepared for the Project to assess the potential health risk to the surrounding land uses (Appendix C).

Project construction would result in emissions of diesel particulate matter from heavy construction equipment and trucks accessing the site. The OEHHA has identified carcinogenic and chronic noncarcinogenic effects from long-term exposure but has not identified health effects due to short-term exposure to diesel exhaust. According to the OEHHA health risk assessments, which determine the potential exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should be limited to the period/duration of activities associated with the project. Thus, the duration of the proposed construction activities would only constitute a small percentage of the total 30-year exposure period. Due to this relatively short period of exposure (approximately 11.5 months) and minimal particulate emissions on site, toxic air contaminants generated by the Project construction activities would not result in concentrations causing significant health risks. Nonetheless, a construction HRA (Construction HRA) was prepared for the Project by Urban Crossroads to assess the potential health risk to the surrounding land uses as a result of the proposed warehouse construction and is included in Appendix D of this Draft EIR.

Methodology

The Diesel Particulate Matter HRA and Construction HRA were performed using the AERMOD model and in accordance with the South Coast AQMD's Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis. (AQMD 2003a.) The South Coast AQMD recommends using the U.S. EPA's AERMOD model for mobile source emissions impact assessments by modeling the individual roadways as multiple adjacent volume sources, consistent with the U.S. EPA Haul Road Workgroup Recommendations. (EPA 2012.) The Diesel Particulate Matter HRA and Construction HRA followed these recommendations.

Potential risks associated with the Project's sources of diesel particulate matter (i.e., loading areas on truck travel to and from the site, and the fire water pump) were determined at the nearest receptor impact locations, including the residences to the east and west of the Project site (see **Figure 5.2-1 – HRA Discrete Receptor Locations**). Local dispersion modeling parameters are consistent with other projects in the South Coast Air Basin.

Six (6) separate discrete receptors located at off-site worker receptors (Receptor 1 – Receptor 5) and sensitive receptor (Receptor 6) within the Project vicinity were modeled (**Figure 5.2-1**). All receptor locations were modeled at the nearest property boundary to provide a conservative analysis. Receptor 1 - Receptor 5 are industrial uses. Receptor 2 and Receptor 3 are immediately east of the Project site

along Indian Avenue; Receptor 4 and Receptor 5 are south and southwest of the Project site along Harley Knox Boulevard. Receptor 1 is a commercial property west of the Project site at the intersection of Patterson Avenue and Harley Knox Boulevard. Receptor 6 is a residential property. Receptor 6, the closest sensitive receptor to the Project site, is a residential non-conforming use located southwest of the Project site, along Nevada Avenue. (WEBB-B, p. 13.)

The potential cancer and non-cancer risks evaluated in Appendix C of this Draft EIR are conservatively calculated by the model using the 2003 risk assessment guidelines established by the South Coast AQMD and the OEHHA which assume different exposure periods and pathways for residential uses and workers. These assumptions are listed below:

- The residents at the sensitive receptor locations are assumed to remain outdoors (or have continual contact with outside air) at home for 24-hours a day, 365 days a year, for 70 continuous years.
- The worker multi-pathways include only inhalation, soil ingestion, and dermal exposure for an exposure period of 25 years to determine the health risks associated with Project construction on workers in the nearby industrial and distribution facilities.

The South Coast AQMD thresholds of significance for toxic air contaminants evaluated herein are a maximum incremental cancer risk of 10 in one million and a non-cancer hazard index of 1.0 or greater.

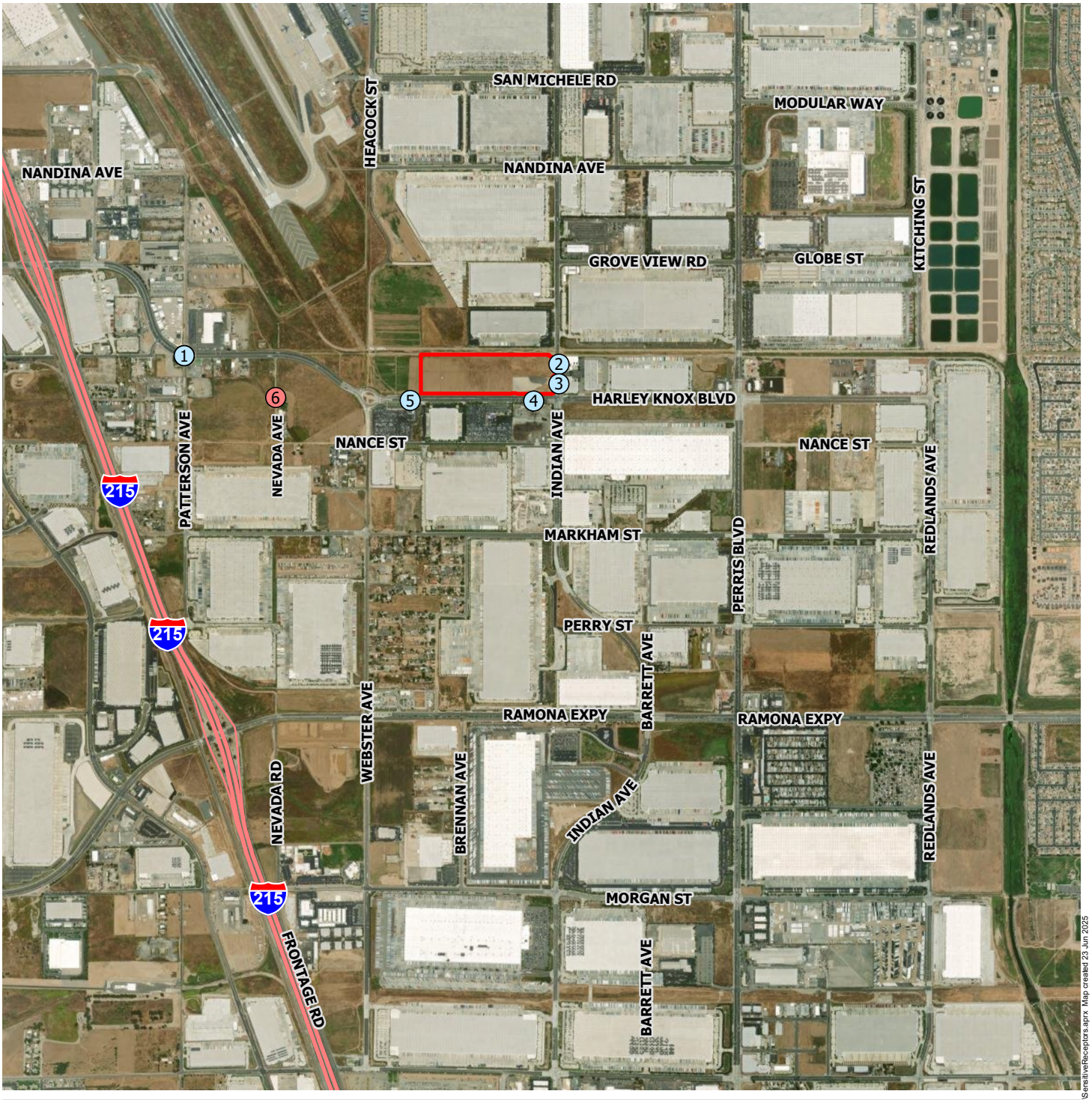
Construction Impacts

The Construction HRA prepared for the Project calculated emissions based on an assumed construction schedule of approximately 246 total working days and mix of construction equipment and hauling activity as presented in the Project-specific Air Quality/Greenhouse Gas Analysis. Construction-related diesel particulate matter emissions are expected to occur primarily as a function of heavy-duty construction equipment that would be operating on-site. (URBAN, p. 7.)

The modeled emission sources for construction activity are shown on **Figure 5.2-2 – Modeled Construction Emission Sources** and include on-site and site-adjacent improvement areas. Potential health risks were evaluated at the same receptor locations shown on **Figure 5.2-1** and the potential cancer and non-cancer risks were calculated consistent with South Coast AQMD methodology.

The Construction HRA estimates that the land use with the greatest potential exposure to Project construction-source diesel particulate matter emissions is Location R6 which is the existing non-conforming residence. Receptor 6 is placed in the private outdoor living areas (backyard) facing the Project site. At the maximally exposed individual receptor, the maximum incremental cancer risk attributable to Project construction-source diesel particulate matter emissions is estimated to be 0.12 in one million, which is substantially less than the South Coast AQMD's significance threshold of 10 in one million. At this same location, potential non-cancer risks were estimated to be less than 0.01, which would not exceed the applicable threshold of 1.0. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. All other receptors during construction activity would experience less risk than what is identified for this location. (URBAN, p. 13.) A summary of risk estimates at maximally exposed individual receptor location is summarized in Table ES-1 of the Construction HRA in Appendix D. Therefore, potential cancer and non-cancer risks resulting from the Project's construction activity are considered less than significant and no mitigation measures are required.

FIGURE 5.2-1 HRA Discrete Receptor Locations



LEGEND

RECEPTORS

- Off-Site Worker
- Sensitive
- Project Site

0 1,000 2,000 Feet

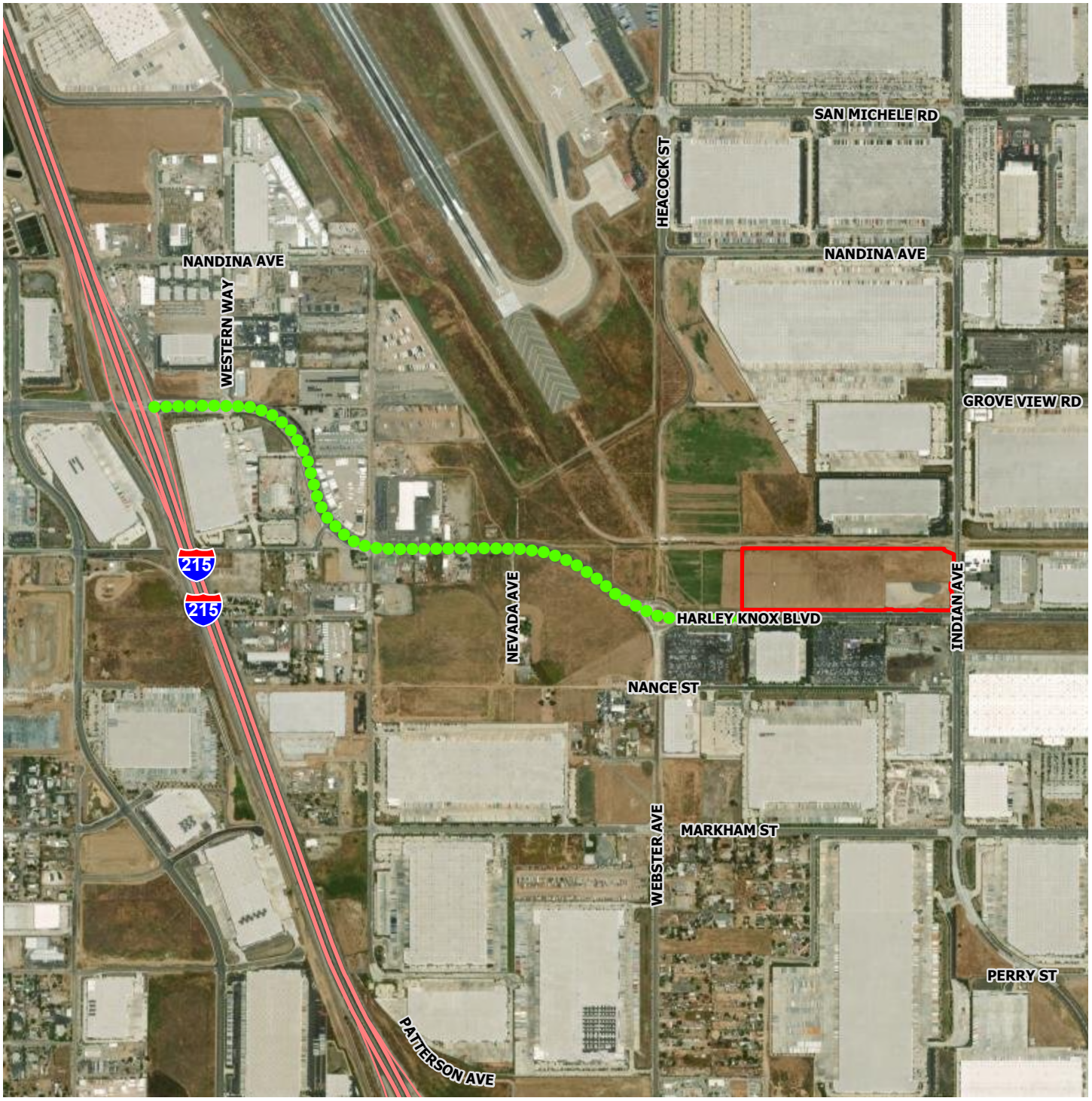
N

\\brkpan01.webb.lan\WO4\2022\22-0142\GIS\PRO\SensitiveReceptors.aprx Map created 23 Jun 2025

Source: Riverside Co. GIS

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FIGURE 5.2-2 Modeled Construction Emission Sources



LEGEND

Project Site

Truck Movement

0 0.125 0.25 0.5 Miles

N

Source: UrbanXRoads, Construction HRA

\\brkpan01.webb.lan\WO4\2022\22-0142\GIS\PRO\SensitiveReceptors.aprx Map created 30 Jun 2025

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Operation Impacts

Cancer Risks

Potential cancer risks are based upon mathematical calculations which estimate the probability of the number of people who will develop cancer after exposure to diesel particulate matter. This probability is generally expressed in terms of the number of people who will develop cancer per one million people who are exposed. It is important to understand that this potential cancer risk represents the probability that a person develops some form of cancer; the estimated risk does not represent actual mortality rates.

The potential cancer risks from diesel particulate matter occur exclusively through the inhalation pathway; therefore, the maximum individual cancer risk (MICR) can be estimated from the following equation:

$$*MICR_{DPM} = CP_{DPM} * DI_{DPM}$$

where,

$MICR_{DPM}$ Cancer risk from diesel particulate matter (DPM); the probability of an individual developing cancer as a result of exposure to diesel particulate matter.

CP_{DPM} [1] Cancer Potency factor for diesel particulate matter $(mg/kg\text{-}day)^{-1}$; estimated probability that a person will contract cancer as a result of inhalation of a diesel particulate matter concentration of 1mg per kilogram of bodyweight continuously over a period of 70 years CP_{DPM} value of 1.1 $(mg/kg\text{-}day)^{-1}$

DI_{DPM} Dose through inhalation (mg/kg-day)

- obtained by multiplying C_{air} x ASF x ED x FAH x DBR x (EF/70) x 10^{-6}
    - C_{air} is the Annual Average 24 hour per day concentration of diesel particulate matter in air ($\mu g/m^3$) (calculated by AERMOD).
    - ASF is the age specific factor.
    - ED is the exposure duration in years.
    - FAH is the fraction of time at home.
    - DBR is the daily breathing rate
    - To be most protective, the DBR was adjusted for each age group, [2]EF is the exposure factor
        - Most sensitive value of 0.96 used. [3]
        - Off-site receptor value of 0.68 was used.

* Table of data used in calculations can be found in Appendix A of the Diesel Particulate Matter HRA.

The specific calculations and assumptions used to determine the potential cancer risks are included in the Diesel Particulate Matter HRA located in Appendix C of this Draft EIR.

The potential Project-generated cancer risk at discrete receptor locations modeled are summarized in **Table 5.2-M – Project Generated Cancer Risk (2026) at Discrete Receptors**, below.

Table 5.2-M – Project-Generated Cancer Risk (2026) at Discrete Receptors

Receptor	Cancer Risk (per million)
Off-site Worker Receptors	
1	0.1
2	0.2
3	0.2
4	0.1
5	0.1
Sensitive Receptors	
6	0.2

Source: WEBB-B, Table 4

As shown in **Table 5.2-M** above, none of the sensitive receptors within the Project vicinity would be exposed to cancer risks from diesel particulate matter that exceed the South Coast AQMD threshold of 10 excess cancer cases per one million people. The highest potential cancer risk at modeled receptor locations is 0.2 per million, located at Receptor 6, the property boundary of a sensitive receptor. The highest modeled cancer risk at off-site worker receptor locations is 0.2 per million, located at Receptor 2 and Receptor 3.

Therefore, excess cancer risks to both industrial/commercial and sensitive receptors are considered to be less than significant and no mitigation is required.

Non-Cancer Risks

Non-cancer risks can be described as acute (short-term, generally one-hour peak exposures) or chronic (long-term exposure) health impacts. The South Coast AQMD recognizes and uses the acute and chronic reference exposure levels (REL) developed by the OEHHA for determining non-cancer health impacts of toxic substances. Exceeding the acute or chronic REL does not necessarily indicate that an adverse health impact will occur; however, levels of exposure above the REL have an increasing but undefined probability of resulting in an adverse health impact, particularly in sensitive individuals. For diesel particulate matter, there is no value for the acute REL and the chronic REL is 5 micro grams per cubic meter ($\mu g/m^3$).

Therefore, non-cancer health risks are expected when people are exposed to short-term diesel particulate matter concentration greater than 5 $\mu g/m^3$. Since the hazard index is the ratio between the diesel particulate matter concentration at each receptor (estimated using AERMOD) and the chronic REL, then non-cancer health risks are significant if the hazard index exceeds 1.0. This threshold for significance is sanctioned by the South Coast AQMD and CARB explicitly to determine the potential non-cancerous health impacts attributable to projects that introduce new sources of diesel exhaust emissions in an area.

The relationship for the non-cancer health effects of diesel particulate matter is given by the following equation:

$$HI_{DPM} = C_{DPM} / REL_{DPM}$$

where,

HI_{DPM} Hazard Index; an expression of the potential for non-cancer health effects.

C_{DPM} Annual average diesel particulate matter concentration in $\mu g/m^3$.

REL_{DPM} Reference exposure level (REL) for diesel particulate matter; the diesel particulate matter concentration at which no adverse health effects are anticipated.

The maximum diesel particulate matter concentration of 0.01776 $\mu g/m^3$ occurs on-site within the truck loading area. Using the equation above, the hazard index is 0.003552, which is approximately three percent of the allowable threshold of 1. Therefore, potential non-cancer risks are considered less than significant and no mitigation measures are required.

Health Effects from Criteria Pollutants

As explained in *Section 5.1.1 - Setting*, above, the California Supreme Court held that an EIR air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. However, as explained, it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in causing asthma), and the existing scientific tools cannot accurately estimate health impacts from an individual project's air emissions without undue speculation. Notwithstanding, the Project's air quality impacts were summarized above. Extensive information concerning the quantifiable and non-quantifiable health risks related to the Project's construction and long-term operation were also provided.

Specifically, the Air Quality/Greenhouse Gas Analysis does evaluate the proposed Project's localized impact to air quality for emissions of CO, NO_X, PM-10, and PM-2.5 by comparing the proposed Project's on-site emissions to the South Coast AQMD's applicable LST. The LST analysis above determined that the Project would not result in emissions exceeding South Coast AQMD's LSTs during construction or operation. Therefore, the proposed Project would not be expected to exceed the most stringent applicable Federal or State ambient air quality standards for emissions of CO, NO_X, PM-10, and PM-2.5.

As such, the proposed Project's emissions would not warrant use of a regional modeling program to correlate health effects on a basin-wide level and would not provide a reliable indicator of health effects if modeled.

Disadvantaged Communities

With regard to the Community Air Protection Program (AB 617), each year CARB's Governing Board is required to consider selecting communities for participation in the Community Air Protection Program. Communities are selected for developing community air monitoring systems, emissions reduction programs, or both in order to improve air quality in their community. Over the first four years of the Program, the Governing Board selected 17 communities where these focused actions are underway. (CARB 2023.) The City of Perris is not one of the selected communities and to date has not been nominated to participate in the Community Air Protection Program. (CARB 2024.)

As previously discussed, CalEnviroScreen is a general mapping tool developed by the OEHHA to help identify California communities that are most affected by sources of pollution. The Project site and its immediately surrounding area are not designated by the California EPA as being part of a disadvantaged community for the purpose of SB 535. However, the environmental effects of the Project are fully evaluated in this Draft EIR and feasible mitigation measures are identified for significant impacts that are within the City's jurisdictional authority to impose and enforce as required by CEQA and the CEQA Guidelines. As indicated in the preceding analysis, the Project's construction and operational localized emissions would not exceed the South Coast AQMD LST thresholds, and the Project would not result in significant health impacts due to diesel particulate matter emissions. The Project would not cause or contribute to any CO "hot spots." SB 535 does not include project-specific requirements or prohibit developments in proximity to the designated communities.

Conclusion

The preceding analysis demonstrates that neither the construction emissions nor operational emissions resulting from implementation of the proposed Project would exceed the LST at the nearest receptor locations. Additionally, the Project would not result in potentially adverse CO concentrations or "hot spots." None of the potential cancer or non-cancer thresholds are exceeded as a result of Project construction and operation for receptors within the proposed Project vicinity. Finally, the Project site is not located within a disadvantaged community nor would its emissions be sufficiently high enough to warrant the use of a regional modeling program to correlate health effects on a basin-wide level.

Thus, the Project would not result in the exposure of sensitive receptors to substantial pollutant concentrations during Project operation and potential impacts would be **less than significant**. No mitigation is required.

Threshold D: *Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The proposed Project presents the potential to result in other emissions, such as those leading to odors in the form of diesel exhaust during construction in the immediate vicinity of the Project site. The closest sensitive receptors to the Project construction site are the existing legal, non-conforming residential properties along Nevada Avenue. However, odors generated during construction would be short-term and would not result in a long-term odorous impact to the surrounding area.

Additionally, CARB has developed an Air Quality and Land Use Handbook to outline common sources of odor complaints, including: sewage treatment plants, landfills, recycling facilities, and petroleum refineries. (AQMD 2005.) The Project is proposed to operate as a non-refrigerated warehouse distribution facility, which is not included on CARB's list of facilities that are known to be prone to generate odors. Therefore, potential impacts would be **less than significant**. No mitigation is required.

5.2.7 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines Section 15126.4). Mitigation measures were evaluated for their ability to reduce or eliminate impacts. The proposed Project is required to implement PVCCSP EIR mitigation measures **MM Air 2** through **MM Air 9**, **MM Air 11** through **MM Air 14** and **MM Air 19** through **MM Air 20**. PVCCSP EIR mitigation measure **MM Air 9** would reduce the Project's short-term construction-

related emissions of VOC to a less than significant level. No Project-specific mitigation is required beyond those required by the PVCCSP EIR mitigation measures listed above.

5.2.8 Summary of Environmental Effects After Mitigation Measures Are Implemented

Implementation of PVCCSP EIR mitigation measure **MM Air 9** would reduce the Project's short-term construction-related emissions of VOC to a less than significant level. PVCCSP EIR mitigation measure **MM Air 9** has quantitative reductions associated with it available in CalEEMod. The mitigated emissions are shown in **Table 5.2-N – Mitigated Estimated Daily Regional Construction Emissions**, below, and indicate that VOC emissions from architectural coatings (painting) activities would be reduced below the South Coast AQMD regional significance thresholds.

Table 5.2-N – Mitigated Estimated Daily Regional Construction Emissions

Activity	Peak Daily Emissions (lb/day)					
	VOC	NO_X	CO	SO_2	PM-10	PM-2.5
South Coast AQMD Daily Construction Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
2026	25.00	**19.50**	41.90	0.06	5.15	**1.68**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: WEBB-A, Table 10

Notes: [a] Maximum emissions are from **Table 5.2-G**.

With implementation of PVCCSP EIR mitigation measure **MM Air 9**, VOC emissions associated with painting activities would be reduced below the short-term significance threshold.

Based on the LST analysis of the proposed Project, neither the short-term construction nor the long-term operation of the Project would result in localized air quality impacts to sensitive receptors in the Project site vicinity for NO_X, CO, PM-10 or PM-2.5. The Project would not generate a CO hot spot and the Project would not expose workers or residents in the immediate Project vicinity to potential cancer and non-cancer risk in excess of South Coast AQMD significance thresholds. Additionally, the Project would not conflict with or obstruct implementation of the AQMP.

5.3 Energy

The following discussion is related to the potential for the proposed Project to have significant impacts due to the inefficient, wasteful, and unnecessary consumption of energy resources during construction or operation, or a conflict with a state or local plan for renewable energy or energy efficiency. Cumulative impacts are discussed in *Section 7.0 – Cumulative Impact Analysis* of this Draft EIR.

A portion of the following discussion includes a summary of the *Air Quality/Greenhouse Gas Analysis for the First Industrial Logistics at Harley Knox and Indian (DPR No. 22-00016 and TPM 38684)*, (included as Appendix B of this Draft EIR), and the *Energy Consumption Calculations* (prepared for the proposed Project by Albert A. Webb Associates (included as Appendix E of this Draft EIR).

In addition to other reference documents, the following references were used in the preparation of this section of the Draft EIR:

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5.3.1 Setting

Energy sources are classified as non-renewable if they cannot be replenished in a short period of time. Therefore, non-renewable energy resources include fossil fuels. Fossil fuels, which consist of oil, coal, and natural gas and associated byproducts, provide the energy required for the vast majority of motorized vehicles and generation of electricity at power plants. Thus, the discussion of energy conservation most relevant to the Project is focused on Project-generated electricity demand, natural gas demand, and fuel consumption.

Electricity

Southern California Edison (SCE) provides service to the City of Perris. SCE is one of the nation's largest electric utilities and provides electricity service to more than 15 million people in a 50,000-square-mile area of central, coastal, and Southern California. SCE monitors and maintains a vast electricity system consisting of approximately 12,782 miles of transmission lines and 90,401 miles of distribution lines. (SCE 2024a.) Two major projects that benefit SCE's service area are the Tehachapi Renewable Transmission Project and the West of Devers Upgrade Project. The Tehachapi Renewable Transmission Project consists of new and upgraded electric transmission lines and substations between eastern Kern County and San Bernardino County, and delivers electricity from new wind farms in the Tehachapi area to SCE customers and the California transmission grid. The Renewable Transmission Project was completed in December 2016. (SCE 2024b.) The West of Devers Upgrade Project will consist of removing and replacing approximately 48 miles of existing transmission lines within an existing transmission corridor between the existing Devers Substation (near Palm Springs), El Casco Substation (Calimesa) Vista Substation (in Grand Terrace), and San Bernardino Substation to provide more capacity for renewable power to be delivered to the power grid. The project upgrades were completed in May 2021 and are currently conducting clean up and restoration activities. (SCE 2024c.)

The City and SCE are dedicated to conserving energy generated by fossil fuels and increasing its portfolio of renewable energy sources. In 2019, 38 percent of SCE's energy supply was generated from renewable energy sources (CPUC 2020, p. 9), which includes bioenergy, geothermal, small hydropower, conduit hydropower, wind, and solar power (CPUC 2020, p. 18). SCE has exceeded the 2020 Renewables Portfolio Standard requirement of 33 percent. (CPUC 2020, p. 6.) Therefore, SCE is in full compliance with the California renewable energy goals and legislative mandates and is on track to meet the 2030 Renewables Portfolio Standard procurement mandate of 60 percent per Senate Bill (SB) 100 which will require all of California's electricity to come from carbon-free sources by 2045. (CPUC 2020, p. 43.) SCE's electricity consumption by sector as of 2022 is provided in **Table 5.3-A – Electricity Consumption in SCE Service Area (2022)[a, b]**.

Table 5.3-A – Electricity Consumption in SCE Service Area (2022)[a, b]

Agricultural & Water Pump	Commercial Building	Commercial Other	Industry	Mining & Construction	Residential	Streetlight	Total Usage
3,149.6	30,496.1	5,321.2	12,876.6	1,776.1	31,603.7	646.6	85,870.0

Notes:
[a] California Energy Commission, Energy Consumption Data Management System, *California Energy Consumption Database*, interactive web tool, (CEC ECDMSa).
[b] all units are million kilowatt-hours (GWh)

As shown in the table above, SCE produced approximately 86 thousand gigawatt hours (GWh) (or approximately 86 billion kilowatt-hours (kWh)) in 2022, of which approximately 13 thousand GWh were consumed by industry and 30 thousand GWh were consumed by the commercial building sector, those sectors which are relevant to the proposed Project. In 2010, the City of Perris consumed approximately 286 GWh of electricity. (Perris CAP.)

Natural Gas

SoCalGas is the principal distributor of natural gas in Southern California, providing retail and wholesale customers with transportation, exchange, storage services and also procurement services to most retail core customers. SoCalGas is a gas-only utility and, in addition to serving the residential, commercial, and industrial markets, provides gas for enhanced oil recovery and electric generation customers in Southern California. (2022 CGR, p. 112.) California's existing gas supply portfolio is regionally diverse and includes supplies from on- and off-shore California sources, southwestern United States supply sources, the Rocky Mountains, and Canada. (2022 CGR, p. 15.) The •California Public Utilities Commission regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from Pacific Gas and Electric (PG&E), SoCalGas, San Diego Gas & Electric (SDG&E), Southwest Gas, and several smaller natural gas utilities. (CPUC NGC.)

Natural gas demand statewide, including volumes not served by utility systems, is expected to decrease at an annual average rate of 1.5 percent from 2022 to 2035. The decline in throughput demand is due to modest economic growth and California Public Utilities Commission-mandated energy efficiency standards and programs and SB 350 goals. Other factors that contribute to the downward trend are tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, and a decline in core commercial and industrial demand. (2022 CGR, p. 115.) From 2020-2035, residential demand is expected to decline approximately one percent per year, on average due to declining use per meter. The core, non-residential markets (comprising core commercial, core industrial and Natural Gas Vehicles) are expected to decline at an average annual rate of 1.4 percent by 2035. However, the Natural Gas Vehicle market is expected to grow 2.1 percent over the forecast horizon. The Natural Gas Vehicle market is expected to grow due to government (federal, state and local) incentives and regulations encouraging the purchase and operation of alternate fuel vehicles as well as the increased use of renewable natural gas that provides significant greenhouse gas (GHG) emissions reduction benefits. The noncore, non-electric generation markets are expected to decline 0.1 percent by 2035. That decline is being driven by very aggressive energy efficiency goals and associated programs. Total electric generation load, including large cogeneration and non-cogeneration electric generation for a normal hydro year, is expected to decrease 2.6 percent per year by 2035. (2022 CGR, p. 115.)

SoCalGas also implements energy efficiency programs. (2022 CGR, p. 133.) Programs administered by SoCalGas include services that help customers evaluate their energy efficiency options and adopt recommended solutions, as well as simple equipment-retrofit improvements, such as rebates for new hot water heaters. (2022 CGR, p. 133.) The overall annual energy efficiency cumulative savings goal is forecast to increase from approximately 4 billion cubic feet in 2020 to 60 billion cubic feet by 2035. (2022 CGR, p. 134.)

Natural gas service must be provided in accordance with SoCalGas's policies and extension rules on file with the California Public Utilities Commission at the time contractual agreements are made. The viability of natural gas is based on present conditions of gas supply and regulatory policies. **Table 5.3-B – Natural Gas Consumption in SoCalGas Service Area (2022)[ab]**, shows the natural gas consumption by SoCalGas service area with the latest data available from the California Energy Commission.

Table 5.3-B – Natural Gas Consumption in SoCalGas Service Area (2022)[ab]

Agricultural & Water Pump	Commercial Building	Commercial Other	Industry	Mining & Construction	Residential	Total Usage
76.8	867.5	98.8	1,605.8	147.4	2,230.2	5,026.5

Notes:
[a] California Energy Commission, Energy Consumption Data Management System, *California Energy Consumption Database*, interactive web tool. CEC ECDMSb.
[b] all numbers in million therms

As shown in the table above, SoCalGas produced approximately 5 billion therms in 2022, of which approximately 1.6 billion therms were consumed by industry and 867 million therms were consumed by the commercial building sector.

Transportation Fuel

Fossil fuels are known to create almost all of the United States' transportation fuels. As stated above, energy sources include oil, coal, and natural gas, which are non-renewable resources that formed when prehistoric plants and animals died and were gradually buried by layers of rock; however, fossil fuel industries drill or mine for these energy sources, burn them to produce electricity, or refine them for use as fuel for heating or transportation (DOE).

The U.S. and specifically California is defined by the automobile. In 2024, there were approximately 36 million vehicles registered in California by the Department of Motor Vehicles. The transportation sector uses about 86 percent of the petroleum consumed in the State, which was approximately 3,036 trillion British thermal units (Btu) in 2023 (EIA).

The 2023 Integrated Energy Policy Report provides the results of the California Energy Commissions assessments of a variety of energy related issues facing California. The Integrated Energy Policy Report contains major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors. The most recent forecast shows transportation electricity demand in California steadily increases through 2040 due to increases in the use of zero emission vehicles. (TEFA, pp. 136-140.)

Over the last 10 years, California's consumption of gasoline has decreased from approximately 15.5 billion gallons in 2016 to approximately 13.5 billion gallons in 2024 (CDTFAb) while the consumption of

diesel fuel has remained fairly steady changing from approximately 3.01 billion gallons in 2016 to approximately 2.97 billion gallons in 2023 (CDTFAa).

5.3.2 Related Regulations

Federal Regulations

At the federal level, the United States Department of Transportation, the United States Department of Energy, and the United States Environmental Protection Agency (EPA) are three agencies with substantial influence over energy policies and programs. Generally, federal agencies influence and regulate transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements. Major federal energy-related laws and plans are discussed below.

Federal Energy Policy and Conservation Act

The Federal Energy Policy and Conservation Act of 2018 grants specific authority to the President of the U.S. to fulfill obligations of the U.S. under the international energy program; provide for the creation of a Strategic Petroleum Reserve capable of reducing the impact of severe energy supply interruptions; conserve energy supplies through energy conservation programs; provide for improved energy efficiency of motor vehicles, major appliances and other consumer products; provide a means for verification of energy data to assure the reliability of energy data; and to conserve water by improving the water efficiency of certain plumbing products and appliances. Furthermore, the Energy Policy and Conservation Act establishes fuel economy standards for on-road motor vehicles in the U.S. (EPCA 2018.)

The National Highway Traffic and Safety Administration (NHTSA), which is part of United States Department of Transportation, is responsible for establishing additional vehicle standards and revising existing standards under the Energy Policy and Conservation Act. The NHTSA has set new fuel economy standards that are estimated to require a combined passenger car and light truck average fuel economy level of 54.5 mpg by 2025 (NHTSA). It should be noted that heavy-duty vehicles (i.e., vehicles and trucks over 8,500 pounds gross vehicle weight) are not currently subject to fuel economy standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model; instead, compliance is determined on the basis of each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. The Corporate Average Fuel Economy program, administered by the EPA, was created to determine vehicle manufacturers' compliance with the fuel economy standards. The EPA calculates a value for each manufacturer, based on city and highway fuel economy test results and vehicles sales. On the basis of the information generated under the program, the United States Department of Transportation is authorized to assess penalties for noncompliance. In the course of over a 30-year history, this regulatory program has resulted in vastly improved fuel economy throughout the United States' vehicle fleet, and also has protected against inefficient, wasteful, and unnecessary use of energy.

In 2012, NHTSA established passenger and light truck Corporate Average Fuel Economy (CAFE) standards for model years 2017 through 2021 which required, on an average industry fleet-wide basis, a range from 40.3 to 41.0 miles per gallon in model year 2021. In 2019, the NHTSA and EPA amended certain existing CAFE and greenhouse gas emissions standards for passenger cars and light trucks and establish new standards, covering model years 2021 through 2026. However, in March 2022, the NHTSA

and EPA revised the standards covering model years 2024 through 2026 and would require an industry fleet-wide average of roughly 49 mpg in model year 2026. (NHTSA 2022.)

Intermodal Surface Transportation Efficiency Act of 1991

The Intermodal Surface Transportation Efficiency Act of 1991 promoted the development of inter-modal transportation systems to maximize mobility, as well as to address national and local interests in air quality and energy. The Intermodal Surface Transportation Efficiency Act contained factors that metropolitan planning organizations were required to address in developing transportation plans and programs, including some energy-related factors. To meet the new Intermodal Surface Transportation Efficiency Act requirements, metropolitan planning organizations adopted explicit policies defining the social, economic, energy, and environmental values that were to guide transportation decisions in that metropolitan area. The planning process for specific projects would then address these policies. Another requirement was to consider the consistency of transportation planning with federal, State, and local energy goals. Through this requirement, energy consumption was expected to become a decision criterion, along with cost and other values that determine the best transportation solution (DOT).

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

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

State

At the State level, the California Energy Commission and California Public Utilities Commission are two agencies with authority over different aspects of energy. The California Public Utilities Commission regulates privately-owned utilities in the energy, rail, telecommunications, and water sectors. The California Energy Commission collects and analyzes energy-related data, prepares statewide energy policy recommendations and plans, promotes and funds energy efficiency programs, and adopts and enforces appliance and building energy efficiency standards. California is currently exempt under federal law from setting State fuel economy standards for new on-road motor vehicles. The California Air Resources Board has responsibility for mobile source emissions in the State. Major State energy-related laws and plans are discussed below.

California Air Resources Board

The California Air Resources Board (CARB), which has the responsibility for control of emissions from mobile sources (CARB 2000, p. 9), took the lead on addressing diesel emissions in the State of California. The first step to significantly reduce diesel emissions occurred in 2000 when CARB approved the “Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles” or Diesel Risk Reduction Plan.

Most recently, CARB approved the 2020 Mobile Source Strategy, which will deliver broad environmental and public health benefits, as well as support much needed efforts to modernize and upgrade transportation infrastructure, enhance system-wide efficiency and mobility options, and promote clean

economic growth in the mobile sector. (CARB 2021.) The 2020 Mobile Source Strategy includes concepts to move the State towards the goal that 100 percent of sales will be zero emission vehicles by 2035 for on-road light-duty vehicles, 100 percent of California-registered trucks are to be zero emission vehicles by 2045, where feasible for on-road medium- and heavy-duty vehicles, and 100 percent of off-road vehicles and equipment are to be zero-emission by 2035, where technologically feasible. (CARB 2021, pp. 4-5.)

Advanced Clean Cars and Trucks

In January 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025.

The program combines the control of smog-causing pollutants and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 40 percent fewer GHG emissions and 75 percent fewer smog-forming emissions. (CARB ACCP.)

The program also requires car manufacturers to offer for sale an increasing number of zero emission vehicles each year, including battery electric, fuel cell, and plug-in hybrid electric vehicles (EV). (CARB ACCP.)

In December 2012, CARB adopted regulations allowing car manufacturers to comply with California's GHG emissions requirements for model years 2017-2025 through compliance with the U.S. EPA GHG requirements for those same model years. (CARB 2012.) In 2022, the Advanced Clean Cars II program was approved, which would rapidly scale down light-duty passenger car, pickup truck and SUV emissions starting with the 2026 model year through 2035. By 2035 all new passenger cars, trucks and SUVs sold in California will have zero emissions.

Additionally, CARB adopted the Advanced Clean Trucks Regulation in 2021. The Advanced Clean Trucks Regulation is part of a holistic approach to accelerate a large-scale transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8 and includes a manufacturers zero emission vehicle sales requirement and a one-time reporting requirement for large entities and fleets. (CARB ACT) CARB is also developing a medium and heavy-duty zero-emission fleet regulation with the goal of achieving a zero-emission truck and bus California fleet by 2045 everywhere feasible and significantly earlier for certain market segments such as last mile delivery and drayage applications.

Heavy-duty Vehicle Greenhouse Gas Regulation

In December 2008, CARB adopted the Heavy-duty Vehicle Greenhouse Gas Regulation to reduce GHG emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. Fuel efficiency is improved through improvements in tractor and trailer aerodynamics and the use of low rolling resistance tires. The tractors and trailers subject to this regulation must use U.S. EPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. Trucks serving the Project that are not drayage trucks will be regulated under this statute and required to comply with SmartWay standards to reduce GHG emissions. As part of the regulatory package for the Heavy-duty Vehicle GHG Regulation, CARB also reviewed and implemented the Drayage Truck Regulation and Truck and Bus Regulation. These three regulations were collectively adopted to address emissions from trucks. (CARB 2010a.)

Low Carbon Fuel Standard

Executive Order S-01-07 was signed on January 18, 2007, the Low Carbon Fuel Standard and mandated a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. In 2009, CARB adopted the Low Carbon Fuel Standard and began implementation on January 1, 2011.

CARB approved some amendments to the Low Carbon Fuel Standard in December 2011, which were implemented on January 1, 2013. In September 2015, the CARB Governing Board approved the re-adoption of the Low Carbon Fuel Standard, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted. In 2018, the CARB Governing Board approved amendments to the regulation, which included strengthening and smoothing the carbon intensity benchmarks through 2030 in-line with California's 2030 GHG emission reduction target enacted through SB 32, adding new crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector. (CARB 2024a.)

California Energy Commission

The California Energy Commission was formed by Assembly Bill (AB) 1575 and is the State's primary energy policy and planning agency. AB 1575, which was adopted in 1975 in response to the oil crisis of the 1970s, also requires EIRs to consider wasteful, inefficient, and unnecessary consumption of energy and was the driving force behind the creation of *CEQA Guidelines* Appendix F. The California Energy Commission was established to address the State's energy challenges and is responsible for the creation of the State Energy Plan. The State Energy Plan identifies the emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The State Energy Plan recommends that the State assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the fewest environmental and energy costs. The State Energy Plan also identifies a number of strategies, including providing assistance to public agencies and fleet operators, encouraging urban designs that reduce vehicles miles traveled, and accommodating pedestrian and bicycle access.

California Public Utilities Commission

The California Public Utilities Commission regulates investor-owned electric and natural gas utilities operating in the State, including SoCalGas. The California Public Utilities Commission regulates the natural gas rates and natural gas services, including in-State transportation over the utilities' transmission and distribution pipeline systems, storage, procurement, metering, and billing. California Public Utilities Commission policy on natural gas infrastructure and capacity is to: 1) allow gas utilities to gain better access to new sources of supply, develop a diverse supply portfolio, and have adequate storage capacity for core procurement requirements; 2) ensure adequate, diverse utility natural gas pipeline and storage infrastructure for utilities and consumers; 3) assure delivery of supplies with a high degree of certainty, especially for core customers; 4) minimize transmission constraints; 5) provide access to a diverse portfolio of supplies; 6) reduce the likelihood of price spikes; 7) allow more gas to be stored when prices are low; 8) allow customers to match supplies with requirements; and 9) obtain fair access to utility transmission systems for suppliers and pipelines.

California Energy Code

The California Energy Code (Title 24, Part 6 of the California Code of Regulations) was established in 1978 to reduce California's energy consumption. Energy use standards in the code are updated periodically to reduce per-capita energy use and to include new programs, such as the California

Renewable Energy Portfolio Standards and the California Solar Initiative. In 2008, the California Public Utilities Commission adopted the state's first "Long-Term Energy Efficiency Strategic Plan" for achieving energy savings in various sectors throughout California. In 2011, the Strategic Plan was updated to include a chapter related to lighting.

Title 20 of the California Code of Regulations

California's Appliance Efficiency Regulations (California Code of Regulations Title 20, Parts 1600–1608) contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California. (CEC Title 20.)

Title 24 of the California Code of Regulations

The California Energy Code (California Code of Regulations Title 24, Part 6) was established in 1978 to reduce California's energy consumption. Energy use standards in the code, referred to as Building Energy Efficiency Standards, are updated on an approximately three-year cycle (CEC Standards). Energy consumption by new buildings in the State is regulated by The California Energy Code via the Building Energy Efficiency Standards. These efficiency standards (commonly referred to as Title 24 standards) apply to newly constructed buildings and additions and alterations to existing buildings. (CEC 2022.) They are designed to reduce wasteful, uneconomic, inefficient or unnecessary consumption of energy, and enhance outdoor and indoor environmental quality. The current 2022 Building Energy Efficiency Standards (Energy Code), which went into effect January 1, 2023, focus on four key areas in new construction of homes and business by encouraging 1) electric heat pump technology and use, 2) establishing electric-ready requirements when natural gas is installed, 3) expanding solar photovoltaic (PV) system and battery storage standards, and 4) strengthening ventilation standards to improve indoor air quality. Specifically, the 2022 updates require all new homes be electric-ready. That means buildings with gas stoves have the electrical panels and wiring to support a switch to electric stoves. Further advancements and cost reductions will continue to expand electric options for heating, cooking, laundering, and EV charging to meet all Californians' needs. (CEC 2022.) The next iteration of the Building Energy Efficiency Standards (Energy Code) goes into effect on January 1, 2026. The Project would be subject to the Title 24 Standards in effect at the time of building permits. It is projected that the current 2022 building efficiency standards will reduce 10 million metric tons of GHGs over 30 years. This reduction is equivalent to taking nearly 2.2 million cars off the road for a year. (CEC 2022.) On a statewide basis throughout 2023, all measures for newly constructed buildings and altered components of existing buildings collectively would save approximately 33 million therms of fossil fuel natural gas and 1.3 billion kWh of electricity.[1]

Green Building Standards

The purpose of Title 24, specifically Part 11, known as the California Green Building Standards (CALGreen) Code, is to encourage sustainable construction practices that reduce negative impacts on the environment through planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code is

[1] Per the Draft Environmental Impact Report Amendments to the Building Energy Efficiency Standards (https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency)

applicable to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout the State. The current cycle of the CALGreen Code was also adopted in 2022 and the next iteration becomes effective on January 1, 2026. See *Section 5.4.2* of this Draft EIR for a more detailed listing of applicable CALGreen code sections.

California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (AB 939) requires each jurisdiction in California to submit detailed solid waste planning documents for the California Department of Resources, Recycling, and Recovery's (CalRecycle) approval, set diversion requirements of 25 percent in 1995 and 50 percent in 2000, established a comprehensive statewide system of permitting, inspections, enforcement, and maintenance for solid waste facilities, and authorized local jurisdictions to impose fees based on the types or amounts of solid waste generated (CalRecycle). As of 2007, jurisdictional diversion rates are no longer calculated; with the passage of the Per Capita Disposal Measurement System (SB 1016), only per capita disposal rates are measured. CalRecycle compares each jurisdiction's reported disposal tons to population to calculate per capita disposal in pounds per person per day (CalRecycle JD.) The City of Perris achieved an annual per capita disposal rate of 6.4 pounds per day per resident, and 16.9 pounds per day per employee in 2022, the most recent data available. (CalRecycle Perris)

AB 341 (2011) amended AB 939 to include a provision declaring that it is the policy goal of the State that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter (Public Resources Code Section 41780.01) The state did not meet its 75 percent by 2020 recycling goal set out in AB 341. However, CalRecycle identified five strategies and three additional focus areas that can be pursued by the state to reach the 75 percent goal. (CalRecycle 2020.)

The City contracts with CR&R Incorporated for waste management. Regarding construction and demolition material, CR&R offers a variety of ways to recycle and reduce waste on construction sites. Landfill is further reduced through construction waste re-planning, source separation, mixed recycling, and the reuse or donation of used or excess construction materials. (Perris CAP.)

Renewable Portfolio Standard

Established in 2002 under SB 1078, accelerated in 2006 under SB 107, again in 2011 under SBX1-2, in 2015 under SB 350, and again in 2018 under SB 100, California's Renewable Portfolio Standard required retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020. (SB 1078, SB1368.) The 33 percent standard was consistent with the Renewables Portfolio Standard goal established in the Scoping Plan. (CARB 2008.) Initially, the Renewables Portfolio Standard provisions applied to investor-owned utilities, community choice aggregators, and electric service providers. SBX1-2 added, for the first time, publicly owned utilities to the entities subject to the Renewables Portfolio Standard.

SB 350, signed in 2015, increased the Renewables Portfolio Standard from 33 percent in 2020 to 50 percent by 2030 and will double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation by 2030. (CARB 2017, p. 2.)

SB 100 was subsequently signed in 2018 and directs the California Public Utilities Commission, California Energy Commission, and CARB to plan for 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December

31, 2045. SB 100 also accelerates the Renewables Portfolio Standard target to 50 percent by 2026 and to 60 percent by 2030.

Local

City of Perris Comprehensive General Plan 2030

The City of Perris Comprehensive General Plan 2030 sets forth objectives and policies to promote minimizing the use of energy and instead generating electricity from renewable resources to ensure plentiful future supply and reducing the negative impacts on the environment. Specifically, the Conservation and Healthy Community Element focuses on conserving, among other items, energy resources. The relevant City of Perris General Plan goals, policies, and implementation measures, which are intended to conserve energy in the City, are discussed below.

Conservation Element

Goal VIII	Create a vision for energy and resource conservation and the use of green building design for the City which provides for the protection of the environment while improving the quality of life and promoting sustainability.
Policy VIII.A	Adopt and maintain development regulations, which encourage water and resource conservation.
Measure VIII.A.2	Use indigenous and/or drought-resistant planting and efficient irrigation systems with smart controls in all new and refurbished commercial and industrial development projects. Also, restrict use of turf to 25% or less of the landscaped areas.
Measure VIII.A.4	Use gray water, and water-conserving appliances and fixtures within all new commercial and industrial developments.
Policy VIII.C	Adopt and maintain development regulations which encourage increased energy efficiency in buildings, and the design of durable buildings that are efficient and economical to own and operate. Encourage green building development by establishing density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who meet LEED building standards for new and refurbished developments (U.S. Green Building Council's Leadership in Energy and Environmental Design green building programs).
Measure VIII.C.3	Encourage the design and construction of durable buildings that are efficient and economical to own and operate.
Measure VIII.C.4	Review new development projects for compliance with the design guidelines contained within the Sustainable Community section through Conditions of Approval and a finding that the project conforms to the General Plan.
Measure VIII.C.5	Encourage green building density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who meet LEED building standards for new developments.
Goal IX	Encourage project designs that support the use of alternative transportation facilities.
Policy IX.A	Encourage land uses and new development that support alternatives to the single occupant vehicle.

Measure IX.A.1	Encourage installation of shared vehicle parking and support facilities within new and refurbished commercial and industrial developments, i.e., dual fuel vehicles and charging systems on site, car pool parking, and bus stop shelters.
Measure IX.A.2	Install bicycle paths and create secure and accessible bicycle storage for visitors and occupants within new and refurbished commercial and industrial developments.
Measure IX.A.4	Encourage building and site designs that facilitate pedestrian activity, such as locating buildings close to the street and providing direct connections to public walkways and neighboring land uses.
Measure IX.A.5	The City shall require all new public and private development to include bike and walking paths wherever feasible.
Goal X	Encourage improved energy performance standards above and beyond the California Title 24 requirements.
Policy X.A	Establish density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who exceed current Title 24 requirements for new development.
Policy X.B	Encourage the use of trees within project design to lessen energy needs, reduce the urban heat island effect, and improve air quality throughout the region.
Policy X.C	Encourage strategic shape and placement of new structures within new commercial and industrial projects.
Measure X.C.1	Promote energy conservation by taking advantage of natural site features such as natural lighting and ventilation, sunlight, shade and topography during the site plan process.
Measure X.C.2	When possible, locate driveways and parking on the east and north sides of buildings to reduce heat buildup during hot afternoons.

Healthy Community Element

Policy HC 6.1	Support regional efforts to improve air quality through energy efficient technology, use of alternative fuels, and land use and transportation planning.
Policy HC 6.2	Support regional water quality efforts that balance water conservation, use of recycled water, and best practices in watershed management.

PVCCSP Standards and Guidelines and PVCCSP EIR Mitigation Measures

There are no specific standards or guidelines related to energy conservation identified within the PVCCSP; however, section 13.3.5 does require each new entitlement to attempt to LEED certification:

13.3.5 LEED Certification Eligibility

- LEED Certification Eligibility is based on LEED New Construction and the California Green Building Code (part 11 of Title 24). LEED has four levels of certification: Certified, Silver, Gold, and Platinum. The Project proponent must indicate a commitment to reach a particular level of LEED certification prior to project approval. At a minimum, the City will mandate that any new entitlement shall attempt to achieve a “Certified” status. For each level of LEED Certification that

the project proponent intends to meet in excess of "certified" status, the City shall reward a corresponding level of incentive.

Additionally, the PVCCSP EIR includes various mitigation measures to ensure that projects located within the PVCC area identify air quality impacts from construction and operation and mitigate any potential impacts appropriately. Relevant mitigation measures from the PVCCSP EIR which address air quality impacts and also increase energy efficiency. The following such PVCCSP EIR mitigation measures are applicable to new warehouse projects:

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

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

MM Air 12 Where transport refrigeration units (TRUs) are in use, electrical hookups will be installed at all loading and unloading stalls in order to allow TRUs with electric standby capabilities to use them.

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

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

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

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

City of Perris Climate Action Plan

At the subregional level, the Western Riverside Council of Governments (WRCOG) developed a Subregional Climate Action Plan (CAP) to assist local cities and jurisdictions in meeting statewide goals,

as well as to encourage input and coordination among participating jurisdictions. Perris was a participating member. To meet emissions reduction targets, the Subregional CAP considers existing programs and policies in the subregion that achieve GHG emissions reductions, in addition to new GHG reduction measures. This Subregional CAP uses consistent methodologies and allows jurisdictions to collaboratively implement regionally-effective measures using economies of scale which may lead to lower administrative costs and greater publicity of incentives. Several proposed measures apply to participating jurisdictions uniformly, because they respond to adoption of a state law (e.g., the Low Carbon Fuel Standard) or result from programs administered at the discretion of a utility serving multiple jurisdictions (e.g. utility rebates). The Perris CAP was adopted in 2016 and included the GHG inventories and forecasts from the Subregional CAP. However, the Subregional CAP did not demonstrate compliance with the statewide GHG goal established by SB 32 for 2030 because it was adopted prior to SB 32. Additional discretionary measures have been adopted by participating jurisdictions, including Perris, to voluntarily commit to a participation level that can be implemented in their community.

The Perris CAP includes statewide policies as R1 reduction measures. The R1 measures are consistent with all of the anticipated reduction strategies identified in the AB 32 Scoping Plan for implementation at the state level that will ultimately result in a reduction of GHG emissions at the local level. Perris CAP R2 and R3 measures describe local actions which would be incorporated to provide additional reductions in GHG emissions. R2 measures can be quantified to show the value of the reduction in GHG emissions. The R3 measures are supportive measures or methods of implementation for the R2 measures. R3 measures provide a program through which reductions in emissions would occur, but their value cannot be quantified.

5.3.3 Design Considerations

Design considerations refer to ways in which the proposed Project would reduce potential impacts to energy. The PVCCSP requires each entitlement to attempt to obtain LEED certification. The Project is proposed to implement concepts of efficient design and material use that are consistent with Silver LEED Certification Levels. As stated in Project Description of this Draft EIR (*Section 3.4*), the proposed Project would meet or exceed all applicable standards under the CALGreen Code and Title 24 in effect at the time that the buildings permits are issued. This will be accomplished by incorporating, at a minimum, the following features or other features that are equally efficient to reduce energy consumption:

Energy Efficiency

- Design building shells and components, such as windows, roof systems and electrical systems to meet California Title 24 Standards for nonresidential buildings.

- Design buildings to achieve U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) features for potential certification. This includes design considerations related to the building envelope, heating, ventilation, and air conditioning (HVAC), lighting, and power systems. Additionally, architectural expressions, such as roofs and windows in the buildings would relate to conserving energy.

- Install energy efficient light-emitting diodes (LED) lighting on the site. Provide skylights for natural daylight to reduce the lighting load, therefore saving energy. Lighting would incorporate motion sensors that turn them off when not in use.

- Meet City minimum landscape requirements and provide adequate landscape shade for the site to reduce energy use.

- Install light-colored roofing materials over office area spaces and light-colored paving materials.

- For future office space, install energy efficient HVAC systems (seasonal energy efficiency ratio (SEER) 13), appliances and equipment, and control systems that are Energy Star rated.

- For future office improvement, refrigerants and HVAC equipment would be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global climate change. Ventilation and HVAC systems would be designed to meet or exceed the minimum outdoor air ventilation rates described in the American Society of Heating, Refrigeration, and Air Conditioning Engineers standards and/or per California Title 24 requirements.

- Incorporate Energy Star rated space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.

Water Conservation and Efficiency

- Surface parking lots would be landscaped in accordance with City standards to reduce heat island effect.

- Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls and sensors for landscaping according to the California Department of Water Resources Model Efficient Landscape Ordinance and Chapter 19.70 (Landscaping) of the Perris Municipal Code.

- Design buildings to be water-efficient. Install water-efficient fixtures in accordance with Section 5.303 of the California Green Building Standards Code Part 11.

- Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff in accordance with City Standards.

- Provide education about water conservation and available programs and incentives to the building operators to distribute to employees.

Solid Waste Measures

- Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1 of the California Green Building Standards Code Part 11.

- Provide storage areas for recyclables and green waste and adequate recycling containers located in readily accessible areas in accordance with Section 5.410.1 of the California Green Building Standards Code Part 11.

- The property operator would provide readily available information provided by the City for employee education about reducing waste and available recycling services.

Transportation and Motor Vehicles

- Limit idling time for commercial vehicles to no more than five minutes per Title 13 of the California Code of Regulations, Section 2485.

- Provide electric vehicle (EV) infrastructure and facilitate EV charging in accordance with Section 5.106.5.3, Electric Vehicle Charging Requirements, of the California Green Building Standards Code Part 11. Accordingly, the Project would provide a minimum of 35 EV-capable parking spaces and at least 12 of these spaces would be equipped with EV charging stations at Project opening.[2]

- Signage shall be posted onsite directing truck drivers to use existing City truck routes on Harley Knox Boulevard.

- Provide Class II bike lanes on Harley Knox Boulevard, within the Project's frontage, per the City's Active Transportation Plan.

- Provide adequate bicycle parking near building entrances to promote cyclist safety, security, and convenience in compliance with Section 5.106.4 of the California Green Building Standards Code Part 11 and standard City code requirements.

Onsite Equipment and Loading Docks

- The Project owner would inform building operators of existing requirements to turn off equipment, including heavy-duty equipment, motor vehicles, and portable equipment, when not in use for more than 5 minutes. Truck idling shall not exceed 5 minutes in time. All facilities would post signs (both interior and exterior facing signs, including signs directed at all dock and delivery areas) requiring that trucks shall not be left idling for more than 5 minutes pursuant to Title 13 of the California Code of Regulations, Section 2485, which limits idle times to not more than five minutes and to report violations to California Air Resources Board, the South Coast Air Quality Management District, and the building manager.

- Service equipment (i.e., yard trucks and forklifts) used within the site shall be electric with the necessary electrical charging stations provided or powered by other alternative technology.

Construction

- Require Construction Equipment to Turn Off When Not in Use per Title 13 of the California Code of Regulations, Section 2449.

- Use regionally produced and/or manufactured building materials, where feasible, for Project construction.

[2]These numbers are based on the current requirements of Section 5.106.5.3.1 of the 2022 CALGreen Code. The 2025 CALGreen Code takes effect on January 1, 2026 and the Project would need to provide at least 18 spaces with EV chargers at the time of opening if its building permits are approved after 2025.

- Use “green” building materials where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way.

Land Use Applications

5.3.4 Comments Received in Response to the Notice of Preparation

One comment letter was received related to energy in response to the Notice of Preparation. The comment letter was received from the South Coast AQMD. The comment letter is identified in **Table 2.0 A – Written Comments Received During the Notice of Preparation Comment Period** and included in its entirety in Appendix A of this Draft EIR.

Three verbal comment(s) was/were also received during the June 18, 2025, Draft EIR public scoping meeting. The verbal comments received are summarized in **Table 2.0-B – Verbal Comments Received During the Draft EIR Scoping Meeting**. All energy related comments are addressed in this Section.

5.3.5 Thresholds of Significance

The City of Perris has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G to the *CEQA Guidelines*.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project could have potentially significant impacts in the following areas and these topics are addressed in this Draft EIR:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency

5.3.6 Environmental Impacts before Mitigation

Threshold A: *Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

The analysis of energy impacts utilizes the assumptions from the *Air Quality/Greenhouse Gas Analysis for the First Industrial Logistics at Harley Knox and Indian (DPR No. 22-00016 and TPM 38684)* evaluated in *Section 5.2- Air Quality* and *Section 5.4- Greenhouse Gas Emissions*, respectively (refer to Appendix B of this Draft EIR). Because the California Emissions Estimator Model (CalEEMod) program used in this technical report does not display the amount and fuel type for construction-related sources, additional calculations were conducted and are summarized herein. These calculations are included as Appendix E of this Draft EIR.

This analysis addresses each of the six potential energy impacts identified in CEQA Guidelines Appendix F. Appendix F provides criteria for assessing potential impacts that a project could have on energy supplies, focusing on the goal of conserving energy by ensuring that projects use energy in a wise and efficient manner. Pursuant to impact possibilities listed in CEQA Guidelines Appendix F, a potentially significant impact to energy consumption and conservation could occur if implementation of the proposed Project will:

- Result in the wasteful, inefficient, or unnecessary consumption of energy. Impacts may include:
    1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal;
    2. The effects of the project on local and regional energy supplies and on requirements for additional capacity;
    3. The effects of the project on peak and base period demands for electricity and other forms of energy;
    4. The degree to which the project complies with existing energy standards;
    5. The effects of the project on energy resources;
    6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

The analysis below addresses each of the six potential energy impacts identified in CEQA Guidelines Appendix F.

1. *The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal.*

Construction

Project construction would require the use of construction equipment for site preparation, grading, and building activities, as well as construction workers and vendors traveling to and from the Project site. Construction equipment requires diesel as the fuel source.

Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix and usage factors provided in the CalEEMod construction output files included in Appendix B of this Draft EIR. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour included in Table A9-3-E of the South Coast AQMD's CEQA Air Quality Handbook. Fuel consumption from construction worker and vendor/delivery trucks was calculated using the trip rates and distances provided in the CalEEMod construction output files. Total vehicle miles traveled (VMT) was then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor using CARB's EMFAC 2021 model. EMFAC provides the total annual VMT and fuel consumed for each vehicle type. Consistent with CalEEMod, construction worker trips were assumed to include 25 percent light duty gasoline auto and 75 percent light duty gasoline trucks. Construction vendor trucks were assumed to be medium-duty and heavy-duty diesel trucks. Please refer to Appendix E of this Draft EIR for detailed calculations.

As shown below in **Table 5.3-C – Construction Energy Use**, approximately 60,503 gallons of diesel fuel, and 33,816 gallons of gasoline is estimated to be consumed during Project construction.

Table 5.3-C – Construction Energy Use

Fuel	Fuel Consumption
Diesel	
On-Road Construction Trips[a]	24,750 Gallons
Off-Road Construction Equipment[b]	35,752 Gallons
Diesel Total	**60,503 Gallons**
Gasoline	
On-Road Construction Trips[a]	33,816 Gallons
Off-Road Construction Equipment[c]	-- Gallons
Gasoline Total	**33,816 Gallons**

Notes:

Source: Table 1 – Total Construction-Related Fuel Consumption, Appendix E of Draft EIR.

[a] On-road mobile source fuel use based on vehicle miles traveled (VMT) from CalEEMod for construction in 2025 and fleet-average fuel consumption in gallons per mile from EMFAC2021. See Table 2 for calculation details. See Table 2 – On Road Construction Trip Estimates, Appendix E of Draft EIR for calculation details.

[b] Off-road mobile source fuel usage based on a fuel usage rate of 0.05 gallons of diesel per horsepower (HP)-hour, based on South Coast AQMD CEQA Air Quality Handbook, Table A9-3E.

[c] All emissions from off-road construction equipment were assumed to be diesel.

Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Construction equipment is also required to comply with regulations limiting idling to five minutes or less (California Code of Regulations Title 13 Section 2449(d)(3)) which is included in PVCCSP EIR mitigation measure **MM Air 4**, as described in *Section 5.3.2*, above. Furthermore, there are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the State. For comparison, the State of California consumed approximately 13.5 billion gallons of gasoline and 3 billion gallons of diesel fuel in 2024, which is the most recent published data. (CDTFAa; CDTFAb.) Thus, the fuel usage during Project construction would account for a negligible percent of the existing gasoline and diesel fuel related energy consumption in the State of California. Furthermore, it is expected that construction-related fuel consumption associated with the Project would not be any more inefficient, wasteful, or unnecessary than at other construction sites in the region.

Operation

The Project would promote building energy efficiency through compliance with energy efficiency standards (Title 24 and CALGreen). The Project proponent has committed to implement concepts of efficient design and material use that are consistent with Silver LEED Certification Levels. The Project would also reduce vehicle fuel usage due to compliance with regulatory programs and Project design features that reduce VMT and fuel use. AB 1493 ("the Pavley Standard") requires reduction in GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 and thereafter. Executive Order S-01-07 went into effect in 2010 and required a reduction in the carbon intensity of transportation fuels used in California that will decrease GHG emissions by reducing the full fuel-cycle and the carbon intensity of the transportation fuel pool in California. The Advanced Clean Cars I and II program, first introduced in 2012, combines the control of smog, soot causing pollutants and greenhouse gas emissions into a single coordinated package of requirements for model years 2017

through 2035. Advanced Clean Trucks, if implemented, includes a manufacturer's zero emission vehicle sales requirement that will further reduce fuel consumption.

For operational activities, annual electricity and natural gas consumption were calculated using demand factors provided in the CalEEMod output as part of the greenhouse gas analysis included in *Section 5.4- Greenhouse Gas Emissions*, of this Draft EIR. The Project's total electrical consumption was estimated to be approximately 11,566,667 kWh (approximately 11.6 million kWh) of electricity per year and the natural gas consumption was estimated to be approximately 10,496,652 kilo-British thermal units or approximately 104,966 therms.[3] The Project's electricity demand consists of multiple sources, which include building electricity (2,861,916 kWh/year) and on-site equipment, EV charging, and water use. The electricity demand for potential EV charging stations at each EV charging space is estimated to be approximately 7,227,000 kWh/year. The electricity demand for on-site electric service equipment is estimated to be approximately 1,283,436 kWh/year and 61,320 kWh/year for forklifts and yard trucks, respectively. The electricity use associated with the Project water consumption was also estimated to be approximately 132,995 KWh per year. As shown previously in **Table 5.3-A** and **Table 5.3-B**, SCE produced approximately 86 billion kWh of electricity in 2022 and SoCalGas produced approximately 5 billion therms in 2022. At full build-out, the Project's electricity demand would be a negligible amount of the existing electricity, and the natural gas demand would be a negligible percent of the existing natural gas use in SoCalGas's service area.

Energy impacts associated with transportation during operation were also assessed using the traffic data contained in the greenhouse gas analysis included in *Section 5.4- Greenhouse Gas Emissions*, of this Draft EIR. Based on the annual VMT, gasoline, diesel an alternative fuel consumption rates were calculated using the Riverside County-specific miles per gallon in EMFAC2021. Additionally, energy impacts associated with stationary sources associated with a proposed 100-horsepower diesel-powered fire water pump were also assessed. The fire water pump was assumed to operate for up to one hour per day, one day per week, with a maximum annual operation of 50 hours for routine maintenance and testing. As shown below in **Table 5.3-D – Annual Fuel Consumption**, a total of approximately 128,472 gallons of diesel fuel (mobile and stationary), 190,932 gallons of gasoline, 6,688 gallons of natural gas, 1,908 gallons of plug-in hybrid (combustion portion), 19,528 kilowatts of plug-in hybrid (electric portion), and 96,754 kilowatts of electricity is estimated to be consumed each year.

[3] Per Table 3 – Annual Energy Consumption from Operation, Appendix E of the Draft EIR.

Table 5.3-D – Annual Fuel Consumption

Fuel Type[a, b]	Fuel Consumption (gallons/year)
Gasoline	190,932
Diesel - Mobile	128,272
Diesel - Stationary	200
Natural Gas	6,688
Plug-in Hybrid (Combustion Portion)	1,908
Plug-in Hybrid (Electric Portion)	19,528[c]
Electricity	95,754[c]

Notes:
Source: Table 3 - Annual Energy Consumption from Operation, Appendix E of Draft EIR.
[a] Mobile source fuel use based on annual vehicle miles traveled (VMT) from CalEEMod output for operational year 2026 and fleet-average fuel consumption by fuel type per mile from EMFAC2021 web based data in Riverside County (South Coast).
[b] Operational VMT for the Project was calculated at 6,596,937 miles per year based on the CalEEMod output (Draft EIR Appendix B).
[c] Measured in kWh/year

Regulations previously identified related to energy conservation and fuel efficiency include but are not limited to Title 24 requirements for windows, roof systems, and electrical systems, and Pavley standards and Advanced Clean Cars I and II Program. Designing the building to achieve LEED Silver status will increase energy efficiency beyond existing regulations, and will include, but is not limited to feasible design measures that evaluate increasing reliance on renewable energy resources. Additionally, PVCCSP EIR mitigation measures in *Section 5.2 - Air Quality*, would also serve to reduce energy and fuel consumption. Specifically, PVCCSP EIR mitigation measures **MM Air 11** and **MM Air 12** would reduce fuel usage by limiting truck idling times to five minutes on the site, requiring electrical hook-ups at loading docks, respectively. PVCCSP EIR mitigation measures **MM Air 14** and **MM Air 18** would also promote the use of efficient transportation choices such as carpool/vanpool and buses. Further, as listed in *Section 5.3.3*, above, the Project Applicant shall require on-site service equipment such as forklifts and yard trucks to be electric with the necessary electrical charging stations provided or powered by other alternative technology.

Collectively, compliance with regulatory programs and implementation of these mitigation measures would ensure that the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy. Therefore, potential impacts to energy resources during construction or operation would be less than significant and no additional mitigation is required beyond those required by PVCCSP EIR mitigation measures listed above.

2. *The effects of the project on local and regional energy supplies and on requirements for additional capacity.*

As addressed above, the Project's electrical consumption was minimal in-comparison to SCE's supply. The Project would comply with applicable state and SCE standards that require energy conservation to reduce electrical demand within the Project site. As discussed above, SCE's total electrical consumption was approximately 86 billion kWh in 2022. The Project demand would be a negligible amount of SCE's existing electricity use. As such, there will be adequate capacity to serve the proposed Project.

As addressed above, the Project's natural gas consumption was estimated to be approximately 104,966 therms. The Project would comply with applicable California Public Utilities Commission, State, and SoCalGas standards that require energy conservation to reduce natural gas demand within the Project area. As discussed above, the Project demand would be a negligible percent of SoCalGas's existing natural gas use. As the proposed Project's overall consumption of natural gas use is comparatively insignificant to existing SoCalGas-wide use and as they continuously expand the network, as needed, to meet the need in Southern California, there would be adequate capacity to serve the proposed Project. The Project would therefore not have a significant effect on local and regional energy supplies.

3. *The effects of the project on peak and base period demands for electricity and other forms of energy.*

As described above, SCE produced approximately 86 billion kWh in 2022, and the Project is expected to have a negligible impact to SCE's total electricity usage. Therefore, the Project would not have a substantial effect on energy supplies.

The Project would meet or exceed Title 24 regulatory standards for windows, roof systems, and electrical systems. The Project will install efficient lighting and lighting control systems. Solar or light-emitting diodes (LEDs) would be installed for outdoor lighting. The site and building would be designed to take advantage of daylight, such that use of daylight is an integral part of the lighting systems in building. Lighting would incorporate motion sensors that turn them off when not in use. Trees and landscaping would be used to reduce energy use. Light colored roof materials over office area spaces and light colored paving materials would be installed. With regard to peak hour demands, purveyors of energy resources, including SCE, have established long standing energy conservation programs to encourage consumers to adopt energy conservation habits and reduce energy consumption during peak demand periods. The proposed Project would support these efforts through implementation of PVCCSP EIR mitigation measures **MM Air 19** and **MM Air 20**, identified above, and a number of Project design features that would not only reduce energy consumption during peak hour demands, but also during the base period. To this end, the Project would not substantially affect peak and base period demands for electricity or other forms of energy, such as natural gas.

4. *The degree to which the project complies with existing energy standards.*

The proposed Project would be required to comply with City, State and federal energy conservation measures related to construction and operations. Many of the regulations regarding energy efficiency are focused on increasing building efficiency and renewable energy generation, promoting sustainability through energy conservation measures, as well as reducing water consumption and VMT. As described above in *Section 5.3.2* and *Section 5.3.3*, the proposed Project would meet and/or exceed these regulatory requirements and implement additional design features.

The California Energy Code building energy efficiency standards include provisions applicable to all buildings, residential and non-residential, which are mandatory requirements for efficiency and design. The proposed Project would comply with Title 24. This would be accomplished through among other things, implementation of energy reduction measures, such as energy efficient lighting and appliances. The Project would comply fully with existing energy standards.

Through implementation of energy conservation measures and sustainable practices, the Project would not use large amounts of energy in a manner that is wasteful or otherwise inconsistent with adopted standards, plans or policies.

5. The effects of the project on energy resources.

The effects of the Project on energy supplies and resources from a capacity standpoint are described above in the preceding analysis. With regard to the effects of Project implementation on energy resources, the Project would be required to ensure that the Project does not result in the inefficient, unnecessary, or wasteful consumption of energy. Notable regulatory measures that are discussed above include compliance with California Title 24 and CalGreen Standards, Renewable Portfolio Standards, Pavley standards and the Advanced Clean Cars Program. The Project also includes, but is not limited to, the following design features discussed in *Section 5.3.3*:

- Designing the building to achieve Silver LEED Certification.
- Design building shells and components, such as windows, roof systems and electrical systems to meet California Title 24 Standards for nonresidential buildings.
- Design buildings to achieve U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) features for potential certification. This includes design considerations related to the building envelope, heating, ventilation, and air conditioning (HVAC), lighting, and power systems. Additionally, architectural expressions, such as roofs and windows in the buildings would relate to conserving energy.
- Install energy efficient light-emitting diodes (LED) lighting on the site. Provide skylights for natural daylight to reduce the lighting load, therefore saving energy. Lighting would incorporate motion sensors that turn them off when not in use.
- Meet City minimum landscape requirements and provide adequate landscape shade for the site to reduce energy use.
- Install light-colored roofing materials over office area spaces and light-colored paving materials.
- For future office space, install energy efficient HVAC systems (seasonal energy efficiency ratio (SEER) 13), appliances and equipment, and control systems that are Energy Star rated.
- For future office improvement, refrigerants and HVAC equipment would be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global climate change. Ventilation and HVAC systems would be designed to meet or exceed the minimum outdoor air ventilation rates described in the American Society of Heating, Refrigeration, and Air Conditioning Engineers standards and/or per California Title 24 requirements.
- Incorporate Energy Star rated space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.
- Service equipment (i.e., yard trucks and forklifts) used within the site shall be electric or powered by other alternative fuels.

Further, the previously listed PVCCSP EIR mitigation measures would reduce energy consumption.

6. *The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.*

As stated above, energy impacts associated with transportation during construction and operation of the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy through adherence to existing regulations and implementation of design features and mitigation measures. Regarding efficient transportation alternatives, the Project would have access to alternative transportation choices because the RTA operates two bus routes that travel through the PVCCSP area, Routes 19 and 41. Route 19 passes along Perris Boulevard, one mile from the Project site. Additionally, the Project would comply with CALGreen requirements and, pursuant to the Perris Municipal Code and PVCCSP EIR mitigation measure **MM Air 14**, would provide bike racks and carpool/vanpool parking stalls, in addition to the specific design features incorporated in the Project. Implementation of these various measures would decrease reliance on fossil fuels.

Threshold B: *Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

As previously stated, the proposed Project would comply with City, State and federal energy conservation measures related to construction and operations, as noted above. Many of the regulations regarding energy efficiency are focused on increasing building efficiency and renewable energy generation, promoting sustainability through energy conservation measures, as well as reducing water consumption and VMT and increasing use of alternative fuels. The California Energy Code building energy efficiency standards include provisions applicable to all buildings, residential and non-residential, which are mandatory requirements for efficiency and design. This would be accomplished through among other things, with implementation of energy reduction measures, such as energy efficient lighting and lighting control systems, appliances, installation of light colored roof materials over office spaces, installation of light colored pavements, installation of barriers between conditioned and unconditioned spaces, and providing clean air/vanpool parking stalls. Moreover, the service providers (SCE and SoCalGas) are subject to renewable energy requirements under the Renewables Portfolio Standard.

In addition, the Project would be consistent with applicable goals and polices within the City of Perris General Plan 2030 and the City's CAP. As such, the proposed Project would meet and/or exceed these regulatory requirements. Therefore, potential impacts to obstructing a state or local plan for renewable energy or energy efficiency during construction or operation would be **less than significant**.

5.3.7 Recommended Mitigation Measures

An Environmental Impact Report is required to describe feasible mitigation measures that could minimize significant adverse impacts (CEQA Guidelines Section 15126.4). Development of the proposed Project with adherence to existing regulations and incorporation of the energy efficient and conserving features discussed previously under *Section 5.3.2* and *Section 5.3.3* would not result in wasteful or inefficient and unnecessary consumption of energy. The Project would also implement the feasible and applicable PVCCSP EIR mitigation measures listed in *Section 5.3.2*, to reduce energy consumption and encourage transportation alternatives at the Project site.

5.3.8 Summary of Environmental Effects after Mitigation Measures are Implemented

Implementation of the proposed Project with incorporation of the required design features and implementation of the feasible and applicable PVCCSP EIR mitigation measures would not result in wasteful or inefficient and unnecessary consumption of energy.

5.4 Greenhouse Gas Emissions

The focus of the following analysis is related to potential impacts associated with generating greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment and conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Cumulative impacts are discussed in *Section 7.0 – Cumulative Impact Analysis* of this Draft EIR.

The analysis in this section is based on the *Air Quality/Greenhouse Gas Analysis for the First Industrial Logistics at Harley Knox and Indian (DPR No. 22-00016 and TPM 38684), City of Perris* (WEBB-A) prepared for this Project by Albert A. Webb Associates (included as Appendix B of this Draft EIR). The methodology is consistent with draft guidance prepared by the South Coast Air Quality Management District (South Coast AQMD) for quantification of emissions and evaluation of potential impacts related to GHG emissions. As recommended by South Coast AQMD staff, the California Emissions Estimator Model (CalEEMod) version 2022.1 program was used to quantify project-related emissions. An individual project cannot generate enough GHG emissions to effect a discernible change in global climate. However, the proposed Project may participate in this potential impact by its incremental contribution combined with the cumulative increase of all other sources of GHGs which, when taken together, may influence global climate change. Because these changes may have serious environmental consequences, this section evaluates the potential for the proposed Project to have a significant effect upon California's environment as a result of its potential contribution to the enhanced greenhouse effect.

In addition to other reference documents, the following references were used in the preparation of this section of this Draft EIR:

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5.4.1 Setting

The earth's natural warming process is known as the "greenhouse effect." Certain atmospheric gases act as an insulating blanket for solar energy to keep the global average temperature in a suitable range. These gases are called "greenhouse gases" because they trap heat like the glass walls of a greenhouse. The greenhouse effect raises the temperature of the earth's surface by about 60 degrees Fahrenheit. With the natural greenhouse effect, the average temperature of the earth is about 45 degrees Fahrenheit; without it, the earth would be about minus 15 degrees. It is normal for the earth's temperature to fluctuate over extended periods of time. Over the past one hundred years, however, the earth's average global temperature has generally increased by one degree Fahrenheit. In some regions of the world, the increase has been as much as four degrees Fahrenheit.

Scientists studying the particularly swift rise in global temperatures during the late twentieth century believe that natural variability alone does not account for that rise. Rather, human activity spawned by the industrial revolution has resulted in increased emissions of carbon dioxide and other forms of GHGs, primarily from the burning of fossil fuels (during motorized transport, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.) and deforestation, as well as agricultural activity and the decomposition of solid waste. The most common GHG is carbon dioxide (CO_2), which constitutes approximately 84 percent of all GHG emissions in California. (CEC 2006.) Worldwide, the State of California ranks as the 12th to 16th largest emitter of CO_2 and is responsible for approximately two percent of the world's CO_2 emissions. Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect. (CEC 2006.) While the increase in temperature is known as "global warming," the resulting change in weather patterns is known as "global climate change." Global climate change is evidenced in changes to wind patterns, storms, precipitation, and air temperature.

Global climate change is, by definition, a global issue and California's efforts to reduce GHG emissions will not alone change the impact of global climate change. Global concentrations of GHG rather than locational GHG emissions result in adverse climate change impacts that differentially occur throughout the world, and specific scientific metrics and methodologies to measure the climate change

consequences (if any) of locally-specific impacts remain subject to considerable scientific uncertainty. For example, California emits only a tiny fraction of global GHG. The whole of the California economy's GHG emissions have dropped from approximately 1.35 percent of global GHG emissions in 1990 to 0.98 percent in 2011. As Governor Brown once noted about California's GHG reduction efforts, "we can do things in California, but if others don't follow, it will be futile." Thus, reducing California's GHG emissions (even as the 8th eighth largest economy in the world) cannot meaningfully impact the quantity of GHGs in the global atmosphere. To date, the vast majority of other states and nations have not followed California's lead in mandating GHG emission reductions across a broad spectrum of economic sectors under laws and regulations discussed in greater detail below and have not enacted regulations similar to those adopted in California. California already has nearly the lowest level of GHG per capita of any state.

Project-level emissions for activities that occur as a result of population-based variables (people needing housing, jobs, and services) that occur in California reduces global GHG emissions by facilitating more growth and development in California relative to other states.

Greenhouse Gases

Gases responsible for global climate change in the South Coast Air Basin and their relative contribution to the overall warming effect are carbon dioxide (55 percent), chlorofluorocarbons (CFCs) (24 percent), methane (15 percent), and nitrous oxide (6 percent). It is widely accepted that continued increases in GHG will contribute to global climate change although there is uncertainty concerning the magnitude and timing of future emissions and the resultant warming trend. (AQMD 2005.)

"Stratospheric ozone depletion" refers to the slow destruction of naturally occurring ozone, which lies in the upper atmosphere (called the stratosphere) and which protects Earth from the damaging effects of solar ultraviolet radiation. Certain compounds, including CFCs, halons, carbon tetrachloride, methyl chloroform, and other halogenated compounds, accumulate in the lower atmosphere and then gradually migrate into the stratosphere. In the stratosphere, these compounds participate in complex chemical reactions to destroy the upper ozone layer. Destruction of the ozone layer increases the penetration of ultraviolet radiation to the Earth's surface, a known risk factor that can increase the incidence of skin cancers and cataracts, contribute to crop, and fish damage, and further degrade air quality. (AQMD 2005.)

GHG and ozone-depleting gases include, but are not limited to, the following:

- **Carbon dioxide –** Carbon dioxide results from fossil fuel combustion in stationary and mobile sources. It contributes to the greenhouse effect, but not to stratospheric ozone depletion. In the South Coast Air Basin, approximately 48 percent of carbon dioxide emissions come from transportation, residential and utility sources which contribute approximately 13 percent each, 20 percent come from industry, and the remainder comes from a variety of other sources. (AQMD 2005.)
- **Methane –** Atmospheric methane is emitted from both non-biogenic and biogenic sources. Non-biogenic sources include fossil fuel mining and burning, biomass burning, waste treatment, geologic sources, and leaks in natural gas pipelines. Biogenic sources include wetlands, rice agriculture, livestock, landfills, forest, oceans, and termites. Methane sources can also be divided into anthropogenic and natural. Anthropogenic sources include rice agriculture, livestock, landfills, waste treatment, some biomass burning, and fossil fuel combustion. Natural sources are wetlands, oceans, forests, fire, termites, and geological sources. Anthropogenic sources currently account for more than 60 percent of the total global emissions. It is a

greenhouse gas and traps heat 40–70 times more effectively than carbon dioxide. In the South Coast Air Basin, more than 50 percent of human-induced methane emissions come from natural gas pipelines, while landfills contribute 24 percent. Methane emissions from landfills are reduced by South Coast AQMD Rule 1150.1 – Control of Gaseous Emissions from Active Landfills. Methane emissions from petroleum sources are reduced by a number of rules in South Coast AQMD Regulation XI that control fugitive emissions from petroleum production, refining, and distribution. (AQMD 2005.)

- **Other regulated greenhouse gases include Nitrous Oxide, Sulfur Hexafluoride, Hydrofluorocarbons, and Perfluorocarbons** – These gases all possess heat-trapping potentials hundreds to thousands of times more effective than carbon dioxide. Emission sources of nitrous oxide gases include, but are not limited to, waste combustion, wastewater treatment, fossil fuel combustion, and fertilizer production. Because the volume of emissions is small, the net effect of nitrous oxide emissions relative to carbon dioxide or methane is relatively small. Sulfur hexafluoride, hydrofluorocarbon, and perfluorocarbon emissions occur at even lower rates.
- **Chlorofluorocarbons** –CFCs are emitted from blowing agents used in producing foam insulation. They are also used in air conditioners and refrigerators and as solvents to clean electronic microcircuits. CFCs are primary contributors to stratospheric ozone depletion and to global warming. 63 percent of CFC emissions in the South Coast Air Basin come from the industrial sector. Federal regulations require service practices that maximize recycling of ozone-depleting compounds (both CFCs, hydro-chlorofluorocarbons and their blends) during the servicing and disposal of air-conditioning and refrigeration equipment. South Coast AQMD Rule 1415 – Reduction of Refrigerant Emissions from Stationary Refrigeration and Air Conditioning Systems requires CFC refrigerants to be reclaimed or recycled from stationary refrigeration and air conditioning systems. South Coast AQMD Rule 1405 – Control of Ethylene Oxide and Chlorofluorocarbon Emissions from Sterilization or Fumigant Processes requires recovery of reclamation of CFCs at certain commercial facilities and eliminates the use of some CFCs in the sterilization processes. Some CFCs are classified as Toxic Air Contaminants and regulated by South Coast AQMD Rule 1401 – New Source Review of Toxic Air Contaminants and South Coast AQMD Rule 1402 Control of Toxic Air Contaminants from Existing Sources.
- **Halons –** These compounds are used in fire extinguishers and behave as both ozone-depleting and GHG. Halon production ended in the United States in 1993. South Coast AQMD Rule 1418 – Halon Emissions from Fire Extinguishing Equipment requires the recovery and recycling of halons used in fire extinguishing systems and prohibits the sale of halon in small fire extinguishers.
- **Hydro-chlorofluorocarbons –** HCFCs are solvents, similar in use and chemical composition to CFCs. The hydrogen component makes HCFCs more chemically reactive than CFCs, allowing them to break down more quickly in the atmosphere. These compounds deplete the stratospheric ozone layer, but to a much lesser extent than CFCs. HCFCs are regulated under the same South Coast AQMD rules as CFCs.
- **1,1,1,-trichloroethane (TCA) –** TCA (methyl chloroform) is a solvent and cleaning agent commonly used by manufacturers. It is less destructive on the environment than CFCs or HCFCs, but its continued use will contribute to global warming and ozone depletion. 1,1,1-trichloroethane is a synthetic chemical that does not occur naturally in the environment. No TCA is supposed to be manufactured for domestic use in the United States after January 1, 2002 because it affects the ozone layer. TCA had many industrial and household uses, including use

as a solvent to dissolve other substances, such as glues and paints; to remove oil or grease from manufactured metal parts; and as an ingredient of household products such as spot cleaners, glues, and aerosol sprays. South Coast AQMD regulates this compound as a toxic air contaminant under Rules 1401 and 1402.

Unlike criteria air pollutants and Toxic Air Contaminants, which are pollutants of regional and local concern, climate change is a global problem and GHGs are global pollutants. Impacts of GHG emissions are a function of their total atmospheric concentration and most GHGs are globally well mixed atmospheric constituents. This means that the location of a particular GHG emission, in contrast to the situation for criteria pollutants, does not change its environmental impact.

Global Warming Potentials

Individual GHGs have varying global warming potential and atmospheric lifetimes. The Intergovernmental Panel on Climate Change developed the Global Warming Potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of individual GHGs is determined through a comparison with the GWP of CO_2. CO_2 has a GWP of one; CH_4 has a GWP of 28, meaning that on a molecule by molecule basis, CH_4 has 28 times the global warming potential of CO_2. CO_2-equivalents (CO_2e) are the emissions of a GHG multiplied by the GWP. The CalEEMod program calculates the CO_2e based on the GWPs reported in the Intergovernmental Panel on Climate Change Fifth Assessment Report. (IPCC 2013.) A Sixth Assessment Report is in progress was finalized in July 2023. **Table 5.4-A – Global Warming Potentials and Atmospheric Lifetimes** shows the GWP and atmospheric lifetimes of various GHGs with relatively long atmospheric lifetimes from the Intergovernmental Panel on Climate Change 2013 report.

Table 5.4-A – Global Warming Potentials and Atmospheric Lifetimes

Gas	Atmospheric Lifetime	Global Warming Potential (100-Year Time Horizon)
Carbon Dioxide (CO_2)	--	1
Methane (CH_4)	12.4	28
Nitrous Oxide (N_2O)	121	265-298
Hydrofluorocarbons (HFCs) HFC-134a	13.4	1,300-1,550
Perfluoromethane (CF_4)	50,000	6,630-7,350
Chlorofluorocarbons (CFCs) CFC-11	45	4,660-5,350

Source: Intergovernmental Panel on Climate Change, Fifth Assessment Report, *Climate Change 2013– The Physical Science Basis*, 2013, Table 8.7

Effects of Climate Change

Agriculture

Global climate change can cause drought, higher temperatures, saltwater contamination through rising sea levels, flooding, and increased risk of pests. Because California feeds not only its own residents, but the entire U.S. and other countries as well, production declines could lead to food shortages and higher prices. (OAG 2025)

Forest and Biodiversity

Forest and rangelands cover over 80 percent of California's 100 million acres. Climate change will affect tree survival and growth, reducing these lands' productivity and changing their habitats. In addition,

climate change makes forests more vulnerable to fires by increasing temperatures and making forests and brush drier. Today's fire season in the western United States starts earlier, lasts longer, and is more intense than in the last several decades. Wildfire occurrence statewide could increase several fold by the end of the century, increasing fire suppression and emergency response costs and damage to property. (OAG 2025)

California is one of the most biologically diverse regions of the world, with the highest number of unique plant and animal species of all 50 states and the greatest number of endangered species. Climate change will adversely affect plant and wildlife habitats and the ability of the State's varied ecosystems to support clean water, wildlife, fish, timber and other goods and services. (OAG 2025)

Public Health

Californians already experience the worst air quality in the nation. Hotter temperatures lead to more smog, which can damage lungs, and increases childhood asthma, respiratory and heart disease, and death. Certain segments of the population are at greater risk, including the elderly, infants, persons with chronic heart or lung disease, people who cannot afford air conditioning, and those who work outdoors. As temperatures rise, the number of days of extreme heat events also will rise, causing increases in the risk of injury or death from dehydration, heatstroke, heart attack and respiratory problems. (OAG 2025)

Sea Level Rise

The sea level along California's coasts has risen nearly eight inches in the past century and is projected to rise by as much as 20 to 55 inches by the end of the century. A 55-inch sea level rise could put nearly half a million people at risk of flooding by 2100, and threaten property and infrastructure, including roadways, buildings, hazardous waste sites, power plants, and parks and tourist destinations. (OAG 2025)

As sea levels rise, saltwater contamination of the State's delta and levee systems will increase. Saltwater contamination of the Sacramento/San Joaquin Delta will threaten wildlife and the source of drinking water for 20 million Californians. Farmland in low areas may also be harmed by salt-contaminated water. (OAG 2025)

Water Resources

The Sierra Nevada snowpack functions as the most important natural reservoir of water in California. Under current conditions, the snowpack is created in fall and winter and slowly releases about 15 million acre-feet of water in the spring and summer, when California needs it most. California's dams and water storage facilities are built to handle the snow melt as it happened in the past. Higher temperatures are now causing the snowpack to melt earlier and all at once. Earlier and larger releases of water could overwhelm California's water storage facilities, creating risk of floods and water shortages. (OAG 2025)

5.4.2 Related Regulations

International

International Treaties and Other Developments

The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change. It was adopted in Kyoto, Japan, on December 11, 1997, and entered into force on February 16, 2005 for the 141 countries that ratified it. The major feature of the Kyoto Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions. The targets amount to an average of five percent reduction against 1990 levels over the five-

year period 2008-2012. The major distinction between the Protocol and the Convention is that while the Convention encouraged industrialized countries to stabilize GHG emissions, the Kyoto Protocol commits them to do so. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of “common but differentiated responsibilities.” (UN 1997.)

Negotiations after the Kyoto Protocol have continued in an attempt to address the period after the first “commitment period" of the Kyoto Protocol, concluded at the end of 2012. In Durban, South Africa in 2011, parties to the protocol agreed in principle to negotiate a new comprehensive and legally binding climate agreement by 2015 and to enter it into force for all parties starting from 2020. Intensive negotiations took place under the Ad Hoc Group on the Durban Platform for Enhanced Action throughout 2012 through 2015 and culminated in the adoption of the Paris Agreement by the Conference of the Parties on December 12, 2015. The Paris Agreement seeks to accelerate and intensify the actions and investment needed for a sustainable low carbon future. Its central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. (UN 2016a.)

In accordance with Article 21, paragraph 1, of the Paris Agreement, the Agreement shall enter into force on the thirtieth day after the date on which at least 55 Parties to the Convention accounting in total for at least an estimated 55 percent of the total global greenhouse gas emissions have deposited their instruments of ratification, acceptance, approval, or accession with the Depositary. As of September 3, 2016, there are 180 signatories to the Paris Agreement. Of these, 26 States have also deposited their instruments of ratification, acceptance, or approval accounting in total for 39.06 percent of the total global greenhouse gas emissions. The United States ratified the Paris agreement on September 3, 2016. In accordance with its Article 20, the Agreement shall be open for signature at the United Nations Headquarters in New York from April 22, 2016 until April 21, 2017 by States and regional economic integration organizations that are Parties to the United Nations Framework Convention on Climate Change. (UN 2016b.) Although President Trump announced that he was withdrawing the United States from the Paris Agreement, President Biden rejoined in 2021. As of today, the United States is not party to the Paris Agreement.[1]

Federal

Although the U.S. was not a party to the original Kyoto Protocol, then President George W. Bush and his administration established a national policy goal to reduce the GHG emission intensity (tons of GHG emissions per million dollars of gross domestic product) of the U.S. economy by 18 percent by 2012. (NOAA.) The goal did not establish any binding reduction mandates. Rather, the U.S. Environmental Protection Agency (EPA) began to administer a variety of voluntary programs and partnerships with industries that produce and utilize synthetic gases to reduce emissions of particularly potent GHGs.

[1] https://www.whitehouse.gov/presidential-actions/2025/01/putting-america-first-in-international-environmental-agreements/

Supreme Court Ruling in Massachusetts et al. v. Environmental Protection Agency

The Bush Administration's approach to addressing climate change was challenged in *Massachusetts et al. v. Environmental Protection Agency* (2007) 549 U.S. 497. In this decision, the United States Supreme Court held that the EPA was authorized by the Federal Clean Air Act to regulate CO_2 emissions from new motor vehicles. The Court did not mandate that the EPA enact regulations to reduce GHG emissions, but found that the only instance in which the EPA could avoid taking action were if it found that GHGs do not contribute to climate change or if it offered a "reasonable explanation" for not determining that GHGs contribute to climate change.

On December 7, 2009, the EPA issued an "endangerment finding" under the Clean Air Act concluding that GHGs threaten the public health and welfare of current and future generations and that motor vehicles contribute to greenhouse gas pollution. (EPA ECCF.) These findings provide the basis for adopting new national regulations to mandate GHG emission reductions under the federal Clean Air Act. The EPA's endangerment finding paved the way for federal regulation of GHGs.

It was expected that Congress would enact GHG legislation primarily for a cap-and-trade system. However, proposals circulated in both the House of Representatives and Senate were controversial and it may be some time before Congress adopts major climate change legislation. Under the Consolidated Appropriations Act of 2008, Congress established mandatory GHG reporting requirements for some emitters of GHGs. In addition, on September 22, 2009, the EPA issued the Final Mandatory Reporting of Greenhouse Gases Rule. The rule requires annual reporting to the EPA of GHG emissions from large sources and suppliers of GHGs, including facilities that emit 25,000 metric tons or more a year of GHGs.

The following sections summarize the EPA's recent regulatory activities with respect to various types of GHG sources.

EPA and NHTSA Joint Rulemaking for Vehicle Standards

In response to the *Massachusetts v. EPA decision*, discussed above, the Bush Administration issued an Executive Order on May 14, 2007, directing the EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. (White House-A.)

On October 10, 2008, the National Highway Traffic Safety Administration (NHTSA) released a final Environmental Impact Statement analyzing proposed interim standards for passenger cars and light trucks in model years 2011 through 2015. The NHTSA issued a final rule for model year 2011 on March 30, 2009. (NHTSA 2009.)

On May 7, 2010, the EPA and the NHTSA issued a final rule regulating fuel efficiency and GHG pollution from motor vehicles for cars and light-duty trucks for model years 2012–2016. (EPA 2010.) On May 21, 2010, President Obama issued a memorandum to the Secretaries of Transportation and Energy, the Administrators of the EPA, and the NHTSA calling for establishment of additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. (GPO FR 2010.) In response to this directive, the EPA and NHTSA issued a Supplemental Notice of Intent announcing plans to propose stringent, coordinated federal greenhouse gas and fuel economy standards for model year 2017-2025 light-duty vehicles. (GPO FR 2011.) The agencies proposed standards projected to achieve 163 grams/mile of CO_2 in model year 2025, on an average industry fleet wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency.

The California Air Resources Board (CARB) announced its support of this national program. (CARB 2011.) The final rule was adopted in October 2012 and NHTSA intends to set standards for model years 2022-2025 in a future rulemaking. (NHTSA 2012a, NHTSA 2012b.)

In 2019, the NHTSA and EPA amended certain existing Corporate Average Fuel Economy (CAFE) and greenhouse gas emissions standards for passenger cars and light trucks and establish new standards, covering model years 2021 through 2026. The rule also revoked California's ability to set its own, higher fuel efficiency standards, which are granted by waiver. California has filed two lawsuits against the EPA over proposed the amendments and repeal of the waiver. In May 2021, NHTFSA proposed to repeal the amended standards, but the decision was not finalized. (NHFTSA 2021) In March 2022, EPA's most recent decision, they rescinded the action to revoke California's ability to set its own higher fuel efficiency standards. This restored California's authority to implement its own GHG emissions standards. (NHTSA-2022)

Heavy-duty Engines and Vehicles Fuel Efficiency Standards

In addition to the regulations applicable to cars and light-duty trucks, on August 9, 2011, the EPA and the NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks, which applies to vehicles from model year 2014-2018. (EPA 2011.) The EPA and NHTSA adopted standards for CO_2 emissions and fuel consumption respectively, tailored to each of three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this program will reduce GHG emissions and fuel consumption for affected vehicles by nine percent to 23 percent.

In August 2016, the EPA and NHTSA jointly adopted a second round of standards for medium- and heavy-duty vehicles that will cut carbon pollution and improve fuel efficiency, while bolstering energy security and spurring manufacturing innovation. The Phase 2 program promotes a new generation of cleaner, more fuel efficient trucks by encouraging the development and deployment of new and advanced cost-effective technologies through model year 2027. The Phase 2 program achieves 10 percent more GHG reductions. (EPA 2016.)

EPA SmartWay^{SM} Program

SmartWay is an EPA program that reduces transportation-related emissions by creating incentives to improve supply chain fuel efficiency. There are five primary elements of the program: (1) SmartWay Transport Partnership, a partnership in which freight carriers and shippers commit to benchmark operations, track fuel consumption and improve performance annually; (2) SmartWay Technology Program, a testing, verification, and designation program to help freight companies identify equipment, technologies and strategies that save fuel and lower emissions; (3) SmartWay Finance Program, a competitive grant program that makes investing in fuel-saving equipment easier for freight carriers; (4) SmartWay Vehicles, a program that ranks light-duty cars and small trucks and identifies superior environmental performers with the SmartWay logo; and (5) SmartWay International Interests, which provides guidance and resources for countries seeking to develop freight sustainability programs modeled after SmartWay. (EPA SW.)

Energy Independence and Security Act

On December 19, 2007, the Energy Independence and Security Act of 2007 was signed into law. Among other key measures, the Act would do the following, which would aid in the reduction of national mobile and non-mobile GHG emissions:

1. Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
2. Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.
3. While superseded by NHTSA and EPA actions described above, the Energy Independence and Security Act also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

Additional provisions of the Energy Independence and Security Act address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs." (White House-B)

American Recovery and Reinvestment Act

On February 17, 2009, President Obama signed the American Recovery and Reinvestment Act of 2009. The American Recovery and Reinvestment Act was passed in response to the economic crisis of the late 2000s with the primary purpose to maintain existing jobs and create new jobs. Among the secondary objectives of the American Recovery and Reinvestment Act was investment in “green” energy programs including funding the following through grants, loans, or other funding, private companies developing renewable energy technologies, local and state governments implementing energy efficiency and clean energy programs, research in renewable energy, biofuels, and carbon capture, and development of high efficiency or electric vehicles. (EPA 2009.)

Council on Environmental Quality NEPA Guidelines on GHGs

On February 18, 2010, the White House Council on Environmental Quality published draft guidance on the consideration of greenhouse gases and climate change for National Environmental Policy Act (NEPA) analyses. It recommends that proposed federal actions that are reasonably expected to directly emit 25,000 million metric tons of CO_2 equivalents ($MMTCO_2e$) per year should prepare a quantitative and qualitative NEPA analysis of direct and indirect greenhouse gas emissions. (CEQ 2010.)

The Council on Environmental Quality released *The Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in NEPA Reviews* on August 1, 2016. Although the final guidance does not recommend the 25,000 $MMTCO_2e$ per year reference point specifically, the final guidance does recommend that agencies quantify a proposed agency action’s projected direct and indirect GHG emissions. Agencies should be guided by the principle that the extent of analysis should be commensurate with the quantity of projected GHG emissions and take into account available data and GHG quantification tools that are suitable for and commensurate with the proposed agency action. The rule of reason and the concept of proportionality caution against providing an in-depth analysis of emissions regardless of the insignificance of the quantity of GHG emissions that would be caused by the proposed agency action. The final guidance is applicable to all Federal proposed actions, including individual Federal site-specific actions, Federal grants for or funding of small-scale or broad-scale activities, Federal rulemaking actions, and Federal

land and resource management decisions. (CEQ 2016.) This guidance was withdrawn in 2025 under the Trump administration.[2]

Voluntary Programs

The EPA administers a variety of voluntary programs and partnerships with GHG emitters in which the EPA partners with industries that produce and utilize synthetic gases to reduce emissions of particularly potent GHGs.

For example, the Diesel Emission Reduction Act promotes diesel emission reduction strategies partly through national competitive grants and rebates to fund projects that use EPA or CARB verified or certified diesel emission reduction technologies. This act gave EPA new grant and loan authority for promoting diesel emission reductions and authorized appropriations to the EPA of up to $200 million per year for fiscal years 2007- 2011. Congress appropriated funds for the first time under this program in fiscal year 2008. (EPA DERA.) The EPA also administers the State and Local Energy and Environment Program that provides free tools, data, and technical expertise about energy strategies, including energy efficiency, renewable energy, and other emerging technologies, to help State, local and tribal governments achieve their environmental, energy and economic objectives. (EPA 2019.)

Multi-State/Regional Area

The Western Regional Climate Action Initiative

The Western Regional Climate Action Initiative is a partnership among seven states including California and four Canadian provinces to implement a regional, economy-wide cap-and-trade system to reduce global warming pollution. The Western Regional Climate Action Initiative will cap GHG emissions from the region's electricity, industrial, and transportation sectors with the goal to reduce the heat trapping emissions that cause global warming to 15 percent below 2005 levels by 2020. (WCI 2010) When the Western Regional Climate Action Initiative adopted this goal in 2007, it estimated this would require 2007 levels to be reduced worldwide between 50 and 85 percent by 2050. California is working closely with the other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. CARB's planned Cap-and-Trade Program, discussed below, is also intended to link California and the other member states and provinces. On October 1, 2013, CARB announced the completion of an agreement that defines the process for working collaboratively and jointly to harmonize and integrate the California and Québec cap-and-trade programs. The *Agreement Between the California Air Resources Board and the Gouvernement du Québec Concerning the Harmonization and Integration of Cap-and-Trade Programs Reducing Greenhouse Gas Emissions* fulfills the direction in CARB Board Resolution 13-7. (CARB 2019.)

State

California has adopted various administrative initiatives and also enacted a variety of legislation relating to climate change, much of which sets aggressive goals for GHG emissions reductions within the state. However, none of this legislation provides definitive direction regarding the treatment of climate change in environmental review documents prepared under CEQA. In particular, the amendments to the CEQA Guidelines do not require or suggest specific methodologies for performing an assessment or thresholds of significance, and do not specify GHG reduction mitigation measures. Instead, the CEQA amendments

[2] https://www.federalregister.gov/documents/2025/05/28/2025-09569/withdrawal-of-national-environmental-policy-act-guidance-on-consideration-of-greenhouse-gas

continue to rely on lead agencies to choose methodologies and make significance determinations based on substantial evidence, as discussed in further detail below. (CNRA 2009a.) In addition, no state agency has promulgated binding regulations for analyzing GHG emissions, determining their significance, or mitigating any significant effects in CEQA documents. Thus, lead agencies exercise their discretion determining how to analyze GHGs.

The discussion below provides a brief overview of CARB and California Governor's Office of Land Use and Climate Innovation documents and of the primary legislation that relates to climate change that may affect the emissions associated with the proposed Project. It begins with an overview of the primary regulatory acts that have driven GHG regulation and analysis in California.

Assembly Bill 32

The California Global Warming Solutions Act of 2006 (Assembly Bill (AB) 32) was signed into law in September 2006 after considerable study and expert testimony before the legislature. The law instructs CARB to develop and enforce regulations for the reporting and verifying of statewide GHG emissions. The Act directed CARB to set a GHG emission limit based on 1990 levels to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner. (AB 32.)

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. Based on CARB's calculation of California's 1990 emissions levels, California must reduce GHG emissions by approximately 28.5 percent below "business-as-usual" predictions of year 2020 GHG emissions to achieve this goal. The bill required CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions. CARB has accomplished key milestones set forth in AB 32, including the following:

- June 30, 2007. Identification of discrete early action GHG emissions reduction measures. On June 21, 2007, CARB satisfied this requirement by approving three early action measures. (CARB 2007b.) These were later supplemented by adding six other discrete early action measures. (CARB 2007c.)
- January 1, 2008. Identification of the 1990 GHG emissions level and approval of a statewide limit equivalent to that level and adoption of reporting and verification requirements concerning GHG emissions. On December 6, 2007, CARB approved a statewide limit on GHG emissions levels for the year 2020 consistent with the determined 1990 emissions inventory. (CARB 2007a.)
- January 1, 2009. Adoption of a scoping plan for achieving GHG emission reductions. On December 11, 2008, CARB adopted Climate Change Scoping Plan: A Framework for Change (Scoping Plan), discussed in more detail below. (CARB 2008.)
- January 1, 2010. Adoption and enforcement of regulations to implement the "discrete" actions. Several early action measures have been adopted and became effective on January 1, 2010. (CARB 2007b, CARB 2007c.)
- January 1, 2011. Adoption of GHG emissions limits and reduction measures by regulation. On October 28, 2010, CARB released its proposed cap-and-trade regulations, which would cover sources of approximately 85 percent of California's GHG emissions. (CARB 2010b.) CARB's Board ordered CARB's Executive Director to prepare a final regulatory package for cap-and-trade on December 16, 2010. (CARB 2010c.)

- January 1, 2012. GHG emissions limits and reduction measures adopted in 2011 became enforceable.
- On January 1, 2015, cap-and-trade compliance obligations are phased in for suppliers of natural gas, reformulated gasoline blendstock for oxygenate blending, distillate fuel oils, and liquefied petroleum gas, with emissions that meet or exceed specified emissions thresholds.

As noted above, on December 11, 2008, CARB adopted the Scoping Plan to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions for various categories of emissions. CARB determined that achieving the 1990 emission levels would require a reduction of GHG emissions of by approximately 28.5 percent to achieve 2020 emissions levels in the absence of new laws and regulations (referred to as "business as usual"). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a Cap-and-Trade Program. The key elements of the Scoping Plan include: (CARB 2008.)

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards
- Achieving a statewide renewable energy mix of 33 percent
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets
- Adopting and implementing measures pursuant to existing state laws and policies including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard
    - Creating targeted fees including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation

The CARB approved the final *First Update to the Climate Change Scoping Plan* in May 2014. The first update describes California's progress towards AB 32 goals stating that "California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32." (CARB 2014, p. ES2.) Specifically, "if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80 percent below 1990 levels by 2050." (CARB 2014, p. 34.) The first update laid the groundwork for the GHG emission goals set forth in Executive Order S-3-05 and B-16-2012, which set an objective for California to reduce GHG emissions to 80 percent below 1990 levels by 2050. (CARB 2014, p. 1.)

CARB adopted a second update to the Scoping Plan to reflect the 2030 target codified by Senate Bill (SB) 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Governor Brown's Executive Order B-30-15. Based on the emissions reductions directed by SB 32, the annual

2030 statewide target emissions level for California is 260 $MMTCO_2e$. The companion bill to SB 32, AB 197, provides additional direction to CARB on the following areas related to the adoption of strategies to reduce GHG emissions. (CARB 2017, pp. 2-3.):

- Requires annual posting of GHG, criteria, and Toxic Air Contaminant data throughout the State, organized by local and sub-county level for stationary sources and by at least a county level for mobile sources.
- Requires CARB, when adopting rules and regulations to achieve emissions reductions and to protect the State's most affected and disadvantaged communities, to consider the social costs of GHG emissions and prioritize both of the following:
    - Emissions reductions rules and regulations that result in direct GHG emissions reductions at large stationary sources of GHG emissions and direct emissions reductions from mobile sources.
    - Emissions reductions rules and regulations that result in direct GHG emissions reductions from sources other than those listed above.
- Directs CARB, in the development of each scoping plan, to identify for each emissions reduction measure:
    - The range of projected GHG emissions reductions that result from the measure.
    - The range of projected air pollution reductions that result from the measure.
    - The cost-effectiveness, including avoided social costs, of the measure.

CARB's 2017 Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The 2017 Scoping Plan includes policies to require direct GHG reductions at some of the State's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program, which constrains and reduces emissions at covered sources. (CARB 2017, pp. 5-6.)

CARB approved the most recent scoping plan update in December 2022 (referred to herein as the 2022 Scoping Plan and cited as CARB 2022). CARB's 2022 Scoping Plan lays out the sector-by-sector roadmap for California to achieve carbon neutrality by 2045 or earlier, outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target. The previous Scoping Plans have focused on specific GHG reduction targets for our industrial, energy, and transportation sectors—first to meet 1990 levels by 2020, then to meet the more aggressive target of 40 percent below 1990 levels by 2030. The 2022 Scoping Plan addresses recent legislation (AB 1279) and direction from the current Governor and extends and expands upon the earlier Scoping Plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. The 2022 Scoping Plan also builds upon current and previous environmental justice efforts to integrate environmental justice directly into the plan, to ensure that all communities can reap the benefits of this transformational plan. Specifically, the 2022 Scoping Plan will. (CARB 2022, pp. 2 – 3.):

- Identify a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.

- Identify technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.
- Focus on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrate equity and protecting California's most impacted communities as driving principles throughout the document.
- Incorporate the contribution of natural and working lands (NWL) to the state's GHG emissions, as well as their role in achieving carbon neutrality.
- Rely on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
- Evaluate the substantial health and economic benefits of taking action.
- Identify key implementation actions to ensure success.

The 2022 Scoping Plan outlines how carbon neutrality can be achieved by taking measures to reduce GHGs to meet the anthropogenic emissions target and by expanding actions to capture and store carbon through the state's natural and working lands and using a variety of mechanical approaches. The actions and outcomes in the plan will achieve: significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

Senate Bill 375 and SCAG Regional Transportation Plan/Sustainable Community Plan

SB 375 provides for a new planning process to coordinate land use planning, regional transportation plans, and funding priorities in order to help California meet the GHG reduction goals established in AB 32 (SB 375). SB 375 includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development. SB 375 also requires Metropolitan Planning Organizations relevant to the Project area (including the Southern California Association of Governments (SCAG)) to incorporate a "sustainable communities' strategy" (SCS) into their regional transportation plans that will achieve GHG emission reduction targets by reducing vehicle miles traveled (VMT) from light duty vehicles through development of more compact, complete, and efficient communities.

SCAG's sustainable communities' strategy is included in Connect SoCal 2024 – The Southern California Association of Governments' 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal 2024). (SCAG 2024.) CARB updated the regional targets in 2018 to ensure consistency with the more stringent statewide reduction goals subsequently introduced by the California legislature and the Governor's office. For the SCAG region, the updated targets are eight percent below 2005 per capita emissions levels by 2020 and 19 percent below by 2035. (SCAG 2024, p. 185.)

Connect SoCal 2024 has been found to meet State targets for reducing GHG emissions from cars and light trucks. Connect SoCal 2024 achieves per capita GHG emission reductions relative to 2005 levels of eight percent in 2020, thereby meeting the GHG reduction targets established by CARB for the SCAG region. However, decreased travel during the shutdowns in response to the COVID-19 pandemic most likely helped the achievement of the 2020 target, so continued effort will be necessary to sustain progress to reach the 2035 target. (SCAG 2024, p. 185.)

Senate Bill 605

On September 21, 2014, Governor Edmund Brown signed SB 605, which requires CARB to complete a comprehensive strategy to reduce emissions of short-lived climate pollutants in the State no later than January 1, 2016. As defined in the statute, short-lived climate pollutant means "an agent that has a relatively short lifetime in the atmosphere, from a few days to a few decades, and a warming influence on the climate that is more potent than that of carbon dioxide." SB 605, however, does not prescribe specific compounds as short-lived climate pollutants or add to the list of GHGs regulated under AB 32. In developing the strategy, CARB must complete an inventory of sources and emissions of short-lived climate pollutants in the State based on available data, identify research needs to address any data gaps, identify existing and potential new control measures to reduce emissions, and prioritize the development of new measures for short-lived climate pollutants that offer co-benefits by improving water quality or reducing other air pollutants that impact community health and benefit disadvantaged communities. The draft strategy released by CARB in September 2015 focuses on methane, black carbon, and fluorinated gases, particularly hydrofluorocarbons, as important short-lived climate pollutants. (SB 605.) In March 2017, CARB approved the Short-Lived Climate Pollutants Reduction Strategy that lays out a range of options to reduce short-lived climate pollutants emissions in California, including regulations, incentives, and other market-supporting activities. The Short-Lived Climate Pollutants Reduction Strategy was also informed by the 2017 Scoping Plan. (CARB 2017a.)

Executive Order S-3-05 (Statewide GHG Targets)

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05, which proclaimed that California is vulnerable to the impacts of climate change. It declared that increased temperatures could reduce snowpack in the Sierra Nevada Mountains; could further exacerbate California's air quality problems; and could potentially cause a rise in sea levels. In an effort to avoid or reduce the impacts of climate change, Executive Order S-3-05 called for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.[3]

As discussed in further detail below, executive orders do not have the same status as a law because in California's constitutional system, it is the Legislature, not the Governor, who is entrusted with the role of making statewide laws. (SAHMC, p. 836; CA 1990.) The Legislature declined to include the Executive Order's 2050 goal in AB 32 (discussed below) and again declined to use the EO's 2050 goal in adopting SB 375 (discussed below); nor has it incorporated it in any implementing legislation or applicable plans. Additionally, although CARB has the requisite authority to adopt whatever regulations are necessary beyond the AB 32 horizon year 2020 to meet the target set forth in S-3-05, the agency has not done so. Since the Legislature has never enacted EO S-3-05's 2050 target, and no expert agency has interpreted CEQA to require it, the 2050 target has only the force and effect of an executive order issued by a former Governor. There is no authority that suggests that the constitutional authority to establish CEQA significance thresholds resides in the Governor. CEQA is a statute, and the authority to amend and revise its requirements falls first to the Legislature. The Legislature alone has the authority to enact, amend, or revise legislation, absent some express delegation of authority to the Governor or an executive branch agency through statutory enactments. (PECG 2010, p. 1015.) If the Legislature has delegated any of its authority to define CEQA's requirements, it delegated that authority to the then

[3] https://www.gov.ca.gov/news.php?id=1861

Governor's Office of Planning and Research (now the Governor's Office of Land Use and Climate Innovation) and not to the Governor's office.

Moreover, CARB's Scoping Plan to implement AB 32 looked beyond 2020 to assess whether implementing the Scoping Plan would achieve the State's long-term climate goals and determined that it would: "Climate scientists tell us that the 2050 target represents the level of greenhouse gas emissions that advanced economies must reach if the climate is to be stabilized in the latter half of the 21st century. Full implementation of the Scoping Plan will put California on a path toward these required long-term reductions. Just as importantly, it will put into place many of the measures needed to keep us on that path." (CARB 2008, p.117.) The 2014 Scoping Plan Update confirms this: "California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32"; and it recognizes the potential for California to "reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80 percent below 1990 levels by 2050." (CARB 2014, p. 2.) However, the 2014 Scoping Plan Update also concludes that additional actions will be needed to continue reducing emissions and meet the 2050 goals in the face of anticipated population and economic growth. (CARB 2014) In fact, overwhelming scientific evidence supports the conclusion that significant technological innovation, well beyond the scope of an individual development project, are absolutely necessary components of any plausible path to achieving the EO S-3-05's 2050 target. These new innovations to change fuel technology and energy generation are entirely outside the jurisdiction and control of the City. Achieving these goals will require wholesale shifts in fuel and energy technology, neither of which are currently available, rendering any further analysis of a given development project's impacts relative to the 2050 target too speculative for purposes of determining CEQA significance.

Executive Order B-30-15 (Statewide Interim GHG Targets)

California EO B-30-15 (April 29, 2015) set an "interim" statewide emission target to reduce greenhouse emissions to 40 percent below 1990 levels by 2030 and directed state agencies with jurisdiction over greenhouse gas emissions to implement measures pursuant to statutory authority to achieve this 2030 target and the 2050 target of 80 percent below 1990 levels. (EO B-30-15) Specifically, the Executive Order directed CARB to update the Scoping Plan to express this 2030 target in metric tons. Since CARB has not yet prepared a GHG Inventory for 2030, it is not possible to prepare a numeric analysis that incorporates the 2030 target. This new Executive Order is subject to all the same limitations and infeasibility as discussed above for EO S-03-05. However, EO B-30-15 is more specific in its direction to state agencies so it remains to be seen how it will be implemented, and like EO S-3-05, neither CARB nor the legislature have incorporated the target set forth in EO B-30-15 in any implementing legislation or applicable plans. However, SB 350 was signed into law and (discussed below) it requires the state to double energy efficiency savings in electricity and natural gas by retail customers by 2030 and raises the Renewable Portfolio Standard so that half of the state's electricity must be procured from renewable sources by 2030.

CEQA Guidelines

Senate Bill 97 (CEQA Guidelines)

SB 97 required the Governor's Office of Planning and Research to prepare amended the CEQA Guidelines for submission to the California Natural Resources Agency regarding GHG analysis and feasible mitigation of the effects of GHG emissions as required by CEQA. These amendments became effective as of March 18, 2010. The adoption of SB 97 and subsequent State CEQA amendments are widely recognized as confirmation that lead agencies are required to include an analysis of climate change impacts in CEQA documents.

The CEQA Guidelines GHG Amendments adopted pursuant to SB 97 state in Section 15064.4(a) that lead agencies should "make a good faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. Section 15064.4(a) notes that an agency may identify emissions by either selecting a "model or methodology" to quantify the emissions or by relying on "qualitative analysis or other performance based standards." (CNRA 2009a.) Section 15064.4(b) provides that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment:

- The extent a project may increase or reduce GHG emissions as compared to the environmental setting
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (CNRA 2009a.)

In addition, CEQA Guidelines Section 15064.7(c) specifies that "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." (CNRA 2009a.) Similarly, the 2010 revision to the CEQA Guidelines Appendix G, Environmental Checklist Form which is often used as a basis for lead agencies' selection of significance thresholds, does not prescribe specific thresholds (there were no revisions to the GHG emissions thresholds in the 2022 CEQA Guideline amendments). Rather, CEQA Guidelines Appendix G asks whether the project would conflict with a plan, policy, or regulation adopted to reduce GHG emissions or generate GHG emissions that would significantly affect the environment, indicating that the determination of what is a significant effect on the environment should be left to the lead agency.

Accordingly, the CEQA Guidelines do not prescribe specific methodologies for performing an assessment of GHG impacts, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the CEQA Amendments emphasize the lead agency's discretion to determine the appropriate thresholds of significance consistent with the manner in which other impact areas are handled in CEQA. (CNRA 2009a.)

The CEQA Guidelines indicate that lead agencies should consider all feasible means, supported by substantial evidence and subject to monitoring and reporting, of mitigating the significant effects of GHG emissions. As pertinent to a project, these potential mitigation measures set forth in Section 15126.4(c), may include (1) measures in an existing plan or mitigation program for the reduction of GHG emissions that are required as part of the lead agency's decision; (2) reductions in GHG emissions resulting from a project through implementation of project design features; (3) off-site measures, including offsets, to mitigate a project's emissions; and (4) carbon sequestration measures. (CNRA 2009a.)

Among other things, the California Natural Resources Agency noted in its Public Notice for these changes that impacts of GHG emissions should focus on the cumulative impact on climate change. The Public Notice states: (CNRA 2009b)

- While the Proposed Amendments do not foreclose the possibility that a single project may result in greenhouse gas emissions with a direct impact on the environment, the evidence before

> [California Natural Resources Agency] *indicates that in most cases, the impact will be cumulative. Therefore, the Proposed Amendments emphasize that the analysis of greenhouse gas emissions should center on whether a project's incremental contribution of greenhouse gas emissions is cumulatively considerable.*

Thus, the CEQA Amendments continue to make clear that the significance of GHG emissions is most appropriately considered on a cumulative level.

Energy-Related Sources

Renewable Portfolio Standards

Established in 2002 under SB 1078, accelerated in 2006 under SB 107 and again in 2011 under SBX1-2, in 2015 under SB 350, and again in 2018 under SB 100, California's Renewable Portfolio Standard requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020. (SB 1078, SB 1368.) Initially, the Renewable Portfolio Standard provisions applied to investor-owned utilities, community choice aggregators, and electric service providers. SBX1-2 added, for the first time, publicly owned utilities to the entities subject to the Renewable Portfolio Standard.

SB 350, signed in 2015, increased the Renewable Portfolio Standard from 33 percent in 2020 to 50 percent by 2030 and will double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation by 2030. (CARB 2017, p. 2)

SB 100 was subsequently signed in 2018 and directs the California Public Utilities Commission, California Energy Commission, and CARB to plan for 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. SB 100 also accelerates the Renewable Portfolio Standard target to 50 percent by 2026 and to 60 percent by 2030. (SB 100)

Senate Bill 1

SB 1 of 2006 established the statewide California Solar Initiative and also required the California Energy Commission to implement regulations that required sellers of production homes to offer a solar energy system option to all prospective homebuyers. Besides offering solar as an option to prospective homebuyers, sellers of homes constructed on land for which an application for a tentative subdivision map has been deemed complete on or after January 1, 2011, must disclose to the prospective homebuyer the total installed cost of the solar option, the estimated cost savings associated with the solar energy system option, information about California solar energy system incentives, and information about the Go Solar California website. Sellers of production homes affected by this law may opt for the solar offset program rather than offer solar as an option to prospective homebuyers. The solar offset program requires sellers to install a solar system elsewhere which is equivalent to the aggregate capacity of solar that would have been installed in an affected subdivision if 20 percent of the buyers had opted for the solar option. (SB1.)

Assembly Bill 1109

AB 1109, the Lighting Efficiency and Toxic Reduction Act, required the establishment of minimum energy efficiency standards for all general purpose lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.

Senate Bill 350

SB 350, signed October 7, 2015, is the *Clean Energy and Pollution Reduction Act of 2015*. SB 350 is the implementation of some of the goals of EO B-30-15. The objectives of SB 350 are,

1. To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources.
2. To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.

GHG Emissions Standard for Baseload Generation (SB 1368)

SB 1368 (September 29, 2006) prohibits any retail seller of electricity in California from entering into a long-term financial commitment for baseload generation if the GHG emissions are higher than those from a combined-cycle natural gas power plant. This performance standard applies to electricity generated both within and outside of California and to publicly owned as well as investor-owned electric utilities.

Mobile Sources

Mobile Source Reductions (AB 1493)

AB 1493 ("the Pavley Standard") required CARB to adopt regulations by January 1, 2005, to reduce GHG emissions from non-commercial passenger vehicles and light-duty trucks starting model year 2009. The bill also required the California Climate Action Registry to develop and adopt protocols for the reporting and certification of GHG emissions reductions from mobile sources for use by CARB in granting emission reduction credits. The bill authorizes CARB to grant emission reduction credits for reductions of GHG emissions prior to the date of enforcement of regulations, using model year 2000 as the starting point for reduction.

In December 2005, CARB applied to the EPA for a waiver under the Clean Air Act to authorize implementation of these regulations. The waiver request was initially formally denied by the EPA in March 2008 after California filed suit to prompt federal action. On June 30, 2009, the EPA granted the waiver to California for its GHG emission standards for motor vehicles. (CARB 2017b) As part of this waiver, the EPA specified the following provision: CARB may not hold a manufacturer liable or responsible for any noncompliance caused by emission debits generated by a manufacturer for the 2009 model year. CARB has adopted a new approach to passenger vehicles (cars and light trucks) by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California.

Low Carbon Fuel Standard

Executive Order S-01-07 was signed on January 18, 2007, the Low Carbon Fuel Standard and mandated a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. In 2009, CARB adopted the Low Carbon Fuel Standard and began implementation on January 1, 2011.

CARB approved some amendments to the Low Carbon Fuel Standard in December 2011, which were implemented on January 1, 2013. In September 2015, the CARB Governing Board approved the re-adoption of the Low Carbon Fuel Standard, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted. In 2018, the CARB Governing Board approved amendments to the regulation, which included strengthening and smoothing the carbon

intensity benchmarks through 2030 in-line with California's 2030 GHG emission reduction target enacted through SB 32, adding new crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector. (CARB 2024.)

Advanced Clean Cars

In January 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025.

The program combines the control of smog causing pollutants and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer GHG emissions and 75 percent fewer smog-forming emissions.

The program also requires car manufacturers to offer for sale an increasing number of zero-emission vehicles each year, including battery electric, fuel cell, and plug-in hybrid electric vehicles (EV). (CARB ACCP.)

In December 2012, CARB adopted regulations allowing car manufacturers to comply with California's GHG emissions requirements for model years 2017-2025 through compliance with the EPA GHG requirements for those same model years. (CARB 2012.) In 2022, the Advanced Clean Cars II program was approved, which would rapidly scale down light-duty passenger car, pickup truck and SUV emissions starting with the 2026 model year through 2035. By 2035 all new passenger cars, trucks and SUVs sold in California will have zero emissions.

Additionally, CARB adopted the Advanced Clean Trucks Regulation in 2021. The Advanced Clean Trucks Regulation is part of a holistic approach to accelerate a large-scale transition of zero-emission medium-and heavy-duty vehicles from Class 2b to Class 8 and includes a manufacturers zero-emission vehicle sales requirement and a one-time reporting requirement for large entities and fleets. (CARB ACT) CARB is also developing a medium and heavy-duty zero-emission fleet regulation with the goal of achieving a zero-emission truck and bus California fleet by 2045 everywhere feasible and significantly earlier for certain market segments such as last mile delivery and drayage applications.

Transportation Fuel: Phased-In Cap-and-Trade Compliance Obligation

Pursuant to AB 32, CARB was allowed, but not required, to include among mechanisms intended to reduce GHG emissions a "system of market-based declining annual aggregate emission limits." As noted above, CARB developed a Scoping Plan that directed CARB staff to develop, among other programs, a cap-and-trade mechanism that would apply a declining aggregate cap on GHG emissions and provide a flexible compliance system using tradable instruments. On October 20, 2011, CARB adopted the final cap-and-trade regulation. (California Code of Regulations Title 17, Subchapter 10, Article 5.) The program will impose a “cap” on the total GHG emissions from covered entities in the state and the quantity of emissions allowed under the cap will decrease each year, ultimately reaching the goal of returning state-wide GHG emissions to 1990 levels by 2020. The quantity of allowed emissions actually increases between 2014 and 2015, but that is to account for the addition of the fuel importers and distributors and additional electricity importers to the program as discussed below. The net effect is to reduce overall GHG emissions.

The Cap-and-Trade program started on January 1, 2012 and will proceed in “compliance phases,” the first of which began on January 1, 2013. In the first phase, the program applies to electric utilities,

importers of electricity, and specified industries, including refineries. Approximately 350 electric utilities and approximately 600 industrial facilities were included in the initial phase of the program. In 2015, importers and distributors of fossil fuels were added to the program in the second phase. Specifically, on January 1, 2015, cap-and-trade compliance obligations were phased in for suppliers of natural gas, reformulated gasoline blendstock for oxygenate blending , distillate fuel oils, and liquefied petroleum gas that meet or exceed specified emissions thresholds. The threshold that triggers a cap-and-trade compliance obligation for a fuel supplier is 25,000 metric tonnes or more of CO_2e annually from the GHG emissions that would result from full combustion or oxidation of quantities of fuels (including natural gas, reformulated gasoline blendstock for oxygenate blending, distillate fuel oil, liquefied petroleum gas, and blended fuels that contain these fuels) imported and/or delivered to California. Phasing in of cap-and-trade compliance obligations for transportation fuel providers further reduces GHG emissions attributable to mobile sources, beyond the GHG emissions reductions achieved by the Pavley Standard, Low Carbon Fuel Standard, and Advanced Clean Cars Program discussed above.

Heavy-duty Vehicle Greenhouse Gas Regulation

In December 2008, CARB adopted the Heavy-duty Vehicle GHG Regulation to reduce GHG emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. Fuel efficiency is improved through improvements in tractor and trailer aerodynamics and the use of low rolling resistance tires. The tractors and trailers subject to this regulation must use EPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. Trucks serving the Projects that are not drayage trucks will be regulated under this statute and required to comply with SmartWay standards to reduce GHG emissions. As part of the regulatory package for the Heavy-duty-Vehicle GHG Regulation, CARB also reviewed and implemented the Drayage Truck Regulation and Truck and Bus Regulation. These three regulations were collectively adopted to address emissions from trucks. (CARB 2010a.)

Drayage Truck Regulation

The Drayage Truck Regulation is part of the CARB's ongoing efforts to reduce particulate matter and nitrogen oxides emissions from diesel-fueled engines and improve air quality associated with goods movement. All truck trips from the port to the Project site are drayage trips (California Code of Regulations Title 13, Section 2027(15)). According to CARB, this regulation is designed to support local emissions reduction goals such as the Clean Air Action Plans by the ports of Los Angeles and Long Beach. Phase II of the regulation required that after December 31, 2013, all drayage trucks must be equipped with a 1994 or newer model year engine that meets or exceeds 2007 model year California or federal emission standards. Thus, all the incoming drayage trucks from the Port will have to meet the Phase II requirement.

Warehouse Mobile Equipment Regulation

The Project will use on-site equipment (forklifts, etc.) which generate some GHG emissions. This equipment is highly regulated to protect indoor air quality and worker health and safety. California's Division of Occupational Safety and Health sets and enforces limits for exposure to chemicals in the workplace. There are Permissible Exposure Limits for some main components of diesel exhaust including carbon monoxide and polycyclic aromatic hydrocarbons. Indoor air quality regulations include California Health & Safety Code Sections 105405, 105425, 39930 and 41985—41986 and California Labor Code Section142.3 which involve research, safety, monitoring, and emissions standards. These regulations reduce overall emissions, which has a corresponding benefit to GHG reductions.

Building Standards

California Energy Code (California Code of Regulations, Title 24)

The California Energy Code (California Code of Regulations Title 24, Part 6) was established in 1978 to reduce California's energy consumption. Energy use standards in the code are updated periodically to reduce per-capita energy use and to include new programs, such as the California Renewable Energy Portfolio Standards and the California Solar Initiative. In 2008, the California Public Utilities Commission adopted the state's first "Long-Term Energy Efficiency Strategic Plan" for achieving energy savings in various sectors throughout California. In 2011, the Strategic Plan was updated to include a chapter related to lighting.

Title 20 of the California Code of Regulations

California's Appliance Efficiency Regulations (California Code of Regulations Title 20, Parts 1600–1608) contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California. (CEC Title 20)

Title 24 of the California Code of Regulations

The California Energy Code (California Code of Regulations Title 24, Part 6) was established in 1978 to reduce California's energy consumption. Energy use standards in the code, referred to as Building Energy Efficiency Standards, are updated on an approximately three-year cycle (CEC Standards). Energy consumption by new buildings in the State is regulated by The California Energy Code via the Building Energy Efficiency Standards. These efficiency standards (commonly referred to as Title 24 standards) apply to newly constructed buildings and additions and alterations to existing buildings. (CEC 2022.) They are designed to reduce wasteful, uneconomic, inefficient or unnecessary consumption of energy, and enhance outdoor and indoor environmental quality. The current 2022 Building Energy Efficiency Standards (Energy Code), which went into effect January 1, 2023, focuses on four key areas in new construction of homes and business by encouraging 1) electric heat pump technology and use, 2) establishing electric-ready requirements when natural gas is installed, 3) expanding solar photovoltaic (PV) system and battery storage standards, and 4) strengthening ventilation standards to improve indoor air quality. Specifically, the 2022 updates require all new homes be electric-ready. That means buildings with gas stoves have the electrical panels and wiring to support a switch to electric stoves. Further advancements and cost reductions will continue to expand electric options for heating, cooking, laundering, and EV charging to meet all Californians' needs. (CEC 2022) The next iteration of the Building Energy Efficiency Standards (Energy Code) goes into effect on January 1, 2026 and expands the use of heat pumps in newly constructed residential buildings, encourages electric-readiness, strengthens ventilation standards, and more. (CEC 2025.) The Project would be subject to the Title 24 Standards in effect at the time of building permits.

It is projected that the 2022 building efficiency standards will reduce 10 million metric tons of GHGs over 30 years. This reduction is equivalent to taking nearly 2.2 million cars off the road for a year. (CEC 2022)

Green Building Standards

The purpose of Title 24, specifically Part 11, known as the California Green Building Standards Code and also known as the CALGreen Code, is to encourage sustainable construction practices that reduce negative impacts on the environment through planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code is applicable to the planning, design, operation, construction, use, and occupancy of

every newly constructed building or structure throughout the State. The current cycle of the CALGreen Code was also adopted in 2022 (CALGreen). Standards applicable to this Project include, but are not limited to:

CALGreen Section 5.106.4: Bicycle parking. Comply with Sections 5.106.4.1 and 5.106.4.2; or meet local ordinance, whichever is stricter.

> 5.106.4.1.1 Short-term bicycle parking. If the project is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5 percent of visitor motorized vehicle parking capacity, with a minimum of one two-bike capacity rack.
>
> 5.106.4.1.2 Long-term bicycle parking. For buildings with over 10 tenant-occupants, provide secure bicycle parking for 5 percent of motorized vehicle parking capacity, with a minimum of one space. Acceptable parking facilities shall be convenient from the street and may include: 1. Covered, lockable enclosures with permanently anchored racks for bicycles; 2. Lockable bicycle rooms with permanently anchored racks; and 3. Lockable, permanently anchored bicycle lockers. Note: Additional information on recommended bicycle accommodations may be obtained from Sacramento Area Bicycle Advocates.
>
> 5.106.4.1.5. Acceptable bicycle parking facilities shall be convenient from the street and shall meet one of the following:
>
> - Covered, lockable enclosures with permanently anchored racks for bicycles;
> - Lockable bicycles rooms with permanently anchored racks; or
> - Lockable, permanently anchored bicycle lockers.

CALGreen Section 5.106.5.3: **Electric Vehicle (EV) Charging.** Construction shall provide electric vehicle infrastructure and facilitate electric vehicle charging to comply with Section 5.106.5.3.1 EV capable spaces, Section 5.106.5.3.2 Electric vehicle charging stations and associated Table 5.106.5.3.1 (provided below as **Table 5.4-B – CALGreen Code Electric Vehicle Charging Space Calculations**), or Section 5.106.5.3.6 Electric Vehicle Charging Stations (EVCS) – Power allocation method and associated Table 5.106.5.3.6 (provided below as **Table 5.4-C – CALGreen Code Electric Vehicle Charging Stations Power Allocation Method**), and shall be provided in accordance with the California Building Code and the California Electrical Code.

5.106.5.3.1 Electric Vehicle (EV) EV Capable shall be provided in accordance with Table 5.106.5.3.1 (provided below as **Table 5.4-B – CALGreen Code Electric Vehicle Charging Space Calculations**) and the following requirements:

1 Raceway(s) complying with the California Electrical Code and no less than 1-inch (25mm) diameter shall be provided and shall originate at a service panel or a subpanel(s) serving the area and shall terminate in close proximity to the proposed location of the EV cable space and into a suitable listed cabinet, box, enclosure or equivalent. A common raceway may be used to serve multiple EV capable spaces.

2 A service panel or subpanel(s) shall be provided with a panel space and electrical load capacity for a dedicated 208/240 volt, 40-ampere minimum branch circuits for each EV capable Space,

with delivery of 30-ampere minimum to installed electrical vehicle supply equipment (EVSE) at each EVCS.

3 The electrical system and any on-site distribution transformers shall have sufficient capacity to supply full rated amperage at each EV capable space.

4 The service panel or subpanel(s) circuit directory shall identify the reserved overcurrent protective device space(s) as "EV CAPABLE." The raceway termination location shall be permanently and visibly marked as "EV CAPABLE."

5 Note: A parking space served by electric vehicle supply equipment or designed as a future EV charging space shall count as at least one standard automobile parking space only for the purpose of complying with any applicable minimum parking space requirements established with an applicable minimum parking spaces requirements by an enforcement agency. See Vehicle Code Section 22511.2 for further details.

Table 5.4-B – CALGreen Code Electric Vehicle Charging Space Calculation

Total Number of Actual Parking Spaces	Number of Required EV Capable Spaces	Number of EVCS (EV Capable Spaces provided with EVSE)[2,3]
0-9	0	0
10-25	4	0
26-50	8	2
51-75	13	3
76-100	17	4
101-150	25	6
151-200	35	9
201 and over	20 percent of total actual parking spaces[1]	25 percent of EV capable spaces[1]

Source: CBSC; Table 5.106.5.3.1
Notes:
1. Calculation for spaces shall be rounded up to the nearest whole number.
2. The number of required EVCS (EV capable spaces provided with EVSE) in column 3 count toward the total number of required EV capable spaces shown in column 2.
3. At least one Level EVSE shall be provided.

Electric vehicle (EV) charging stations (ECS)-power allocation method. The power allocation method may be used as an alternative to the requirements in Section 5.106.5.3.1, Section 5.106.5.3.2 and associated Table 5.106.5.3.1. Use Table 5.106.5.3.6 (provided below as **Table 5.4-C – CALGreen Code Electric Vehicle Charging Stations Power Allocation Method**) to determine total power in kVA required based on the total number of actual parking spaces. Power allocation method shall included the following:

1. Use any kVA combination capable spaces, low power Lever 2, Level 2 or DCFC EVSEs.
2. At least one Level 2 EVSE shall be provided.

Table 5.4-C – CALGreen Code Electric Vehicle Charging Stations Power Allocation Method

Total Number of Actual Parking Spaces	Minimum Total kVA @ 6.6 kVA	Total KVA Required in Any Combination of EV Capable [3,4] Low Power level 2, Level 2,[1,2] Or DCFC
0-9	0	0
10-25	26.4	26.4
26-50	52.8	52.8
51-75	85.8	85.8
76-100	112.2	112.2
101-150	165	165
151-200	231	231
201 and over	20 percent of total actual spaces x 6.6	Total required kVA = P x .20 x 6.6 Where P = parking spaces in facility

Source: CBSC; Table 5.106.5.2
Notes:
1. Level 2 EVSE @ 6.6 kVA minimum.
2. At least one Level 2 EVSE shall be provided.
3. Maximum allowed kVA to be utilized for EV capable spaces is 75 percent.
4. If EV capable spaces are utilized, they shall meet the requirements of Section 5.106.5.3.1 EV capable spaces.

Filters. In mechanically ventilated buildings, provide regularly occupied areas of the building with air filtration media for outside and return air that provides at least a Minimum Efficiency Reporting Value (MERV) of 13. Specified filters shall be installed prior to occupancy, and recommendations for maintenance with filters of the same value shall be included in the operation and maintenance manual.

The next iteration of the CALGreen Code goes into effect on January 1, 2026 and the Project would be subject to the CALGreen Code in effect at the time of building permits.

Waste Diversion

California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (AB 939) requires each jurisdiction in California to submit detailed solid waste planning documents for the California Department of Resources, Recycling, and Recovery's (CalRecycle) approval, set diversion requirements of 25 percent in 1995 and 50 percent in 2000, established a comprehensive statewide system of permitting, inspections, enforcement, and maintenance for solid waste facilities, and authorized local jurisdictions to impose fees based on the types or amounts of solid waste generated. (CalRecycle 2018.) As of 2007, jurisdictional diversion rates are no longer calculated; with the passage of the Per Capita Disposal Measurement System (SB 1016), only per capita disposal rates are measured. CalRecycle compares each jurisdiction's reported disposal tons to population to calculate per capita disposal in pounds per person per day. (CalRecycle JD.) The City of Perris achieved an annual per capita disposal rate of 6.4 pounds per day per resident, and 16.9 pounds per day per employee in 2022, the most recent data available. (CalRecycle Perris.)

AB 341 (2011) amended the AB 939 to include a provision declaring that it is the policy goal of the State that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter. (Public Resources Code Section 41780.01.) The state did not meet its 75 percent by 2020 recycling goal set out in AB 341. However, CalRecycle identified five strategies and three additional focus areas that can be pursued by the state to reach the 75 percent goal. (CalRecycle 2020.)

Other Potentially Applicable State Regulations or Policies

Executive Order S-13-08

On November 14, 2008, Governor Arnold Schwarzenegger signed Executive Order S-13-08 (see Appendix B of CNRA 2009) which called on State agencies to develop a strategy for identification of and preparation for expected climate change impacts in California. The resulting 2009 California Climate Adaptation Strategy report was developed by the California Natural Resources Agency in coordination with the Climate Action Team. The report presents the best available science relevant to climate impacts in California and proposes a set of recommendations for California decision-makers to assess vulnerability and promote resiliency in order to reduce California's vulnerability to climate change. Guidance regarding adaptation strategies is general in nature and emphasizes incorporation of strategies into existing planning policies and processes. (CNRA 2009c, pp. 4-5.)

In addition to requiring the Climate Action Team to create a Climate Adaptation Strategy, Executive Order S-13-08 ordered the creation of a comprehensive Sea Level Rise Assessment Report. (CNRA 2009c, p. 138.) The report, published in June 2012, indicates that the sea level along most of California's coast is expected to rise about one meter over the next century and is likely to increase the risk of damage in the form of flooding, coastal erosion, and wetland loss due to storm surges and high waves. The sea level increase is slightly higher than projected for global sea levels. (ONPI 2012.)

Executive Order S-13-08 also called for the California Ocean Protection Council to work with the other Climate Action Team State agencies to develop interim guidance for assessing the potential impacts of sea level rise due to climate change in California. (CNRA 2009, p. 138.) In coordination with National Academy of Sciences efforts, the California Ocean Protection Council published its most recent guidance in 2018 recommending that State agencies consider a range of sea level rise scenarios for the years 2050 and 2100 in order to assess project vulnerability, reduce expected risks, and increase resiliency to sea level rise. (OPC 2018.)

Assembly Bill 1613 (Waste Heat and Carbon Emissions Reduction Act)

AB 1613 directed the California Energy Commission, the California Public Utilities Commission, and CARB to implement the Waste Heat and Carbon Emissions Reduction Act, which is designed to encourage development of new combined heat and power systems in California with a generating capacity of not more than 20 megawatts. In June 2010, the California Energy Commission adopted final guidelines establishing technical criteria for eligibility of combined heat and power systems for programs to be developed by the California Public Utilities Commission and publicly owned utilities. (CEC 2015.) Section 2843 of the Act provides that the California Energy Commission's guidelines require that combined heat and power systems:

- Be designed to reduce waste energy
- Have a minimum efficiency of 60 percent
- Have nitrogen oxides emissions of no more than 0.07 pounds per megawatt-hour

- Be sized to meet the eligible customer generation thermal load
- Operate continuously in a manner that meets the expected thermal load and optimizes the efficient use of waste heat
- Be cost-effective, technologically feasible, and environmentally beneficial

As directed by AB 1613, the California Public Utilities Commission also established (1) a standard tariff for the sale of electricity to electricity corporations for delivery to the electrical grid (State of California, 201 3a); and (2) a "pay as you save" pilot program requiring electricity corporations to finance the installation of qualifying combined heat and power systems by non-profit and government entities. A January 2011 decision by an administrative law judge determined that the pilot program will not be established due to lack of customer interest and difficulties in instituting a program that meets California Department of Corporations requirements (Decision 11 -01 -010 Before the Public Utilities Commission of the State of California, 2011).

Senate Bill X7-7 (Water Conservation Act of 2009)

The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state was required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water and it also reduces emissions from wastewater treatment. (WCA 2009)

The Department of Water Resources adopted a regulation on February 16, 2011 that sets forth criteria and methods for exclusion of industrial process water from the calculation of gross water use for purposes of urban water management planning. The regulation would apply to all urban retail water suppliers required to submit an Urban Water Management Plan, as set forth in the Water Code, Division 6, Part 2.6, Sections 10617 and 10620.

Model Water Efficient Landscape Ordinance

The Model Water Efficient Landscape Ordinance was required by AB 1881, the Water Conservation Act. The bill required local agencies to adopt a local landscape ordinance at least as effective in conserving water as the Model Ordinance by January 1, 2010. Reductions in water use of 20 percent consistent with (SB X7-7) 2020 mandate are expected upon compliance with the Ordinance. (WCA 2009.) Governor Brown's Drought Executive Order of April 1, 2015 (EO B-29-15) directed the Department of Water Resources to update the Ordinance through expedited regulation. The California Water Commission approved the revised Model Ordinance on July 15, 2015, effective December 15, 2015. New development projects that include landscape areas of 500 square feet or more are subject to the Model Ordinance. The update requires: more efficient irrigation systems; incentives for graywater usage; improvements in on-site stormwater capture; limiting the portion of landscapes that can be planted with high water use plants; and reporting requirements for local agencies.

CARB Refrigerant Management Program

The CARB adopted a regulation in 2009 to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is set forth in California Code of Regulations, Title 17, Sections 95380 to 95398. The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with refrigeration systems with more than 50 pounds of a high GWP refrigerant. The refrigerant management program is designed to (1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential

refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and (3) verify GHG emission reductions.

Regional

South Coast Air Quality Management District Policies

CEQA Guidelines and Proposed GHG Thresholds

The South Coast AQMD is principally responsible for comprehensive air pollution control for Los Angeles, Orange, and the urbanized portions of Riverside and San Bernardino Counties, including the City of Perris. The South Coast AQMD works directly with SCAG, County transportation commissions and local governments, and cooperates actively with all federal and state government agencies to regulate air quality.

In April 2008, the South Coast AQMD convened a Working Group to develop GHG significance thresholds. On December 5, 2008, the South Coast AQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold for industrial projects where the South Coast AQMD is the lead agency. As to all other projects where the South Coast AQMD is not the lead agency, the Board has, to date, only adopted an interim threshold of 10,000 metric tons of CO_2e ($MTCO_2e$) per year for industrial stationary source projects for which the South Coast AQMD is the lead agency. (AQMD 2008.)

For all other projects, South Coast AQMD staff proposed a multiple tier analysis to determine the appropriate threshold to be used. The draft proposal suggests the following tiers: Tier 1 is any applicable CEQA exemptions; Tier 2 is consistency with a GHG reduction plan; Tier 3 is a screening value or bright line; Tier 4 is a performance based standard; and Tier 5 is GHG mitigation offsets. (AQMD 2008.) According to the presentation given at the September 28, 2010 Working Group meeting, South Coast AQMD staff proposed a Tier 3 draft threshold of 1,400 to 3,500 $MTCO_2e$ per year depending on if the project was commercial, mixed use, or residential. For the Tier 4 draft threshold, South Coast AQMD staff presented a percent emission reduction target option but did not provide any specific recommendation for a percent emission reduction target; instead it referenced the San Joaquin Valley Air Pollution Control District approach. The percent reduction target is based on consistency with AB 32 as it was based on the same numeric reductions calculated in the Scoping Plan to reach 1990 levels by 2020. The second Tier 4 option is to utilize an efficiency target for 2020 of 4.8 metric tons per service population per year for project level thresholds. (AQMD 2010.)

The Working Group has not convened since the fall of 2010. As of this writing, the proposal has not been considered or approved for use by the South Coast AQMD Board. In the meantime, no GHG significance thresholds are approved for use in the South Coast Air Basin. However, that does not preclude lead agencies from utilizing the draft thresholds to evaluate the potential impacts associated with general development projects. The City of Perris utilizes these draft thresholds to determine the significance of new developments within its jurisdiction.

Ports of Los Angeles and Long Beach

As explained above, the Inland Empire is the heart of the region's warehouse Goods Movement network for goods that enter the Ports and are moved east to the rest of the country. The goods that are unloaded at the Ports are transloaded at locations throughout the region before continuing east. There is a need for another 228 million square feet of warehousing space in the region by 2035. (SCAG 2012.) SCAG is undertaking significant efforts to improve the efficiency of the Goods Movement network which will reduce overall GHG emissions. (SCAG 2012.)

The entire Goods Movement network is based on the Ports of Los Angeles/Long Beach and all truck trips generated by the Project are conservatively assumed to come from the Ports of Los Angeles/Long Beach. The Ports have adopted several plans and policies to reduce GHG emissions as described below.

Green LA: An Action Plan to Lead the Nation in Fighting Global Warming

City of Los Angeles released its climate action plan, *Green LA: An Action Plan to Lead the Nation in Fighting Global Warming*, (Green LA Plan) in May 2007. (LA 2007a.) The Green LA Plan is a voluntary program that sets a goal of reducing the City's GHG emissions to 35 percent below 1990 level by 2030. Climate LA is the implementation framework that contains the details of the more than fifty action items that are included in Green LA Plan. The measures the City of Los Angeles will take to achieve the 35 percent reduction goal include "greening" the Port of Los Angeles and the four airports operated by the City as of the date the Plan was published (including Los Angeles International Airport and Ontario International Airport). Under the Port-specific actions called for by the Green LA Plan, in addition to the Drayage Truck Regulation discussed above, all heavy-duty trucks calling at the ports have been required to meet or exceed the EPA 2007 heavy-duty vehicle on-road emissions standards for particulate matter since the end of 2011. The specific measures for developing the Port-Specific actions are included in the San Pedro Bay Ports Clean Air Action Plan (CAAP).

Port Emission Reduction Plans

The City of Los Angeles Harbor Department (the Port of LA) adopted a Climate Action Plan in 2007 (Port of LA CAP) which addresses emissions from associated trucks. The Port of LA CAP provides that the "landmark plan was developed to reduce criteria pollutant emissions from major tenant operations such as operation of heavy-duty vehicles/trucks, ocean-going vessels, harbor craft, cargo handling equipment, and railroad locomotives." (LA 2007b.) The 2007 plan primarily focused upon municipal operations at the harbor but noted the opportunity to reduce emissions through the associated San Pedro Bay Ports Clean Action Air Plan, with which the Project is consistent as described below. (LA 2007b.)

The Long Beach Sustainable City Action Plan is intended to guide operational, policy and financial decisions to create a more sustainable Long Beach. Transportation Initiative 4 is to "Implement the Clean Air Action Plan, designed to significantly reduce port related air emissions over a 5-year plan, through a partnership with the Harbor Department and its tenants." (LB 2010.) While the Clean Air Action Plan was not specifically designed to reduce GHG emissions, its air emissions reduction strategies would have the added benefit of helping to reduce GHG emissions as well. By utilizing a truck fleet that complies with the Clean Trucks Program, the Project will facilitate these goals.

The San Pedro Bay Ports adopted a Clean Air Action Plan in 2010. This plan is described as a sweeping plan aimed at significantly reducing the health risks posed by air pollution from port-related ships, trains, trucks, terminal equipment and harbor craft (SPBP 2010). While the San Pedro Bay Ports Clean Air Action Plan was not specifically designed to reduce GHG emissions, the identified air pollution reduction strategies would have the added benefit of helping to reduce GHG emissions as well. The San Pedro Bay Ports Clean Air Action Plan emphasizes the Clean Trucks Program and the Technology Advancement Program, through which the port imposes significant efficiency standards on trucks. The Project will comply with this program because the trucks that drive to the warehouse from the Port will comply with the Port's efficiency and engine standards. (SPBP 2010.)

Western Riverside Council of Governments

The City of Perris is a member of the Western Riverside Council of Governments (WRCOG), the municipal planning organization for Riverside County. WRCOG has been a leader in promoting sustainability through its adopted Sustainability Framework, Western Riverside Energy Leader Partnership, HERO Program—an energy efficiency and water conservation financing program, and Western Riverside County Clean Cities Coalition.

Twelve cities in Western Riverside County, including the City of Perris, joined efforts to develop a Subregional Climate Action Plan (CAP), which sets forth a subregional emissions reduction target, emissions reduction measures, and action steps to assist each community to demonstrate consistency with California's Global Warming Solutions Act of 2006 (AB 32). An existing GHG emissions inventory was developed and future emissions and reduction goals were set. Existing GHG reduction programs and policies that had already been implemented in the subregion and best practices from other regions influenced the reduction measures and actions identified in the Subregional CAP to assist meeting the 2020 subregional reduction target of 15 percent below 2010 levels. The Subregional CAP does not establish a reduction target for 2035 or future years; however, the Subregional CAP identifies a reduction goal of 49 percent below baseline emissions levels to set the WRCOG subregion on a trajectory to meet targets identified in SB 375 and Executive Order S-03-05, recognizing that information, methodologies, and data availability may change between now and 2035. (WRCOG Subregional CAP-A.) WRCOG is currently preparing an update and expansion to the Subregional CAP, which will include a comprehensive update to GHG inventories and GHG emissions reduction strategies for all sectors and will establish GHG targets for the years 2030 and 2050 for all WRCOG member jurisdictions. An update was released in 2022, but no further action has been taken to date. (WRCOG Subregional CAP-B.)

Local

City of Perris Comprehensive General Plan 2030

The City of Perris Comprehensive General Plan 2030 contains goals, policies, and implementation measures to reduce GHG emissions within the City in the Conservation and Healthy Community Elements. (Perris GP 2030.) In the City of Perris General Plan, the South Coast AQMD is referred to as the SCAQMD.

Conservation Element

Goal VIII	Create a vision for energy and resource conservation and the use of green building design for the City which provides for the protection of the environment while improving the quality of life and promoting sustainability.
Policy VIII.A	Adopt and maintain development regulations, which encourage water and resource conservation.
Measure VIII.A.2	Use indigenous and/or drought-resistant planting and efficient irrigation systems with smart controls in all new and refurbished commercial and industrial development projects. Also, restrict use of turf to 25% or less of the landscaped areas.
Measure VIII.A.4	Use gray water, and water-conserving appliances and fixtures within all new commercial and industrial developments.
Measure VIII.A.5	Use permeable paving materials within developments to deter water runoff and promote natural filtering of precipitation and irrigation waters.

Measure VIII.A.7	Explore the use of private water well systems for all potable and/or landscaping water use for larger commercial and industrial projects.
Policy VIII.B	Adopt and maintain development regulations that encourage recycling and reduced waste generation by construction projects.
Measure VIII.B.3	Require the installation of recycling bins and provide space for storage and collection of recyclables within development sites.
Measure VIII.B.5	Establish a procurement policy favoring recycling materials.
Measure VIII.B.6	Include text within all demolition permits that encourages recycling of demolition and construction waste within new and refurbished commercial and industrial development projects.
Policy VIII.C	Adopt and maintain development regulations which encourage increased energy efficiency in buildings, and the design of durable buildings that are efficient and economical to own and operate. Encourage green building development by establishing density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who meet LEED building standards for new and refurbished developments (U.S. Green Building Council's Leadership in Energy and Environmental Design green building programs).
Measure VIII.C.3	Encourage the design and construction of durable buildings that are efficient and economical to own and operate.
Measure VIII.C.4	Review new development projects for compliance with the design guidelines contained within the Sustainable Community section through Conditions of Approval and a finding that the project conforms to the General Plan.
Measure VIII.C.5	Encourage green building density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who meet LEED building standards for new developments.
Goal IX	Encourage project designs that support the use of alternative transportation facilities.
Policy IX.A	Encourage land uses and new development that support alternatives to the single occupant vehicle.
Measure IX.A.1	Encourage installation of shared vehicle parking and support facilities within new and refurbished commercial and industrial developments, i.e., dual fuel vehicles and charging systems on site, car pool parking, and bus stop shelters.
Measure IX.A.2	Install bicycle paths and create secure and accessible bicycle storage for visitors and occupants within new and refurbished commercial and industrial developments.
Measure IX.A.4	Encourage building and site designs that facilitate pedestrian activity, such as locating buildings close to the street and providing direct connections to public walkways and neighboring land uses.
Measure IX.A.5	The City shall require all new public and private development to include bike and walking paths wherever feasible.

Goal X	Encourage improved energy performance standards above and beyond the California Title 24 requirements.
Policy X.A	Establish density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who exceed current Title 24 requirements for new development.
Policy X.B	Encourage the use of trees within project design to lessen energy needs, reduce the urban heat island effect, and improve air quality throughout the region.
Policy X.C	Encourage strategic shape and placement of new structures within new commercial and industrial projects.
Measure X.C.1	Promote energy conservation by taking advantage of natural site features such as natural lighting and ventilation, sunlight, shade and topography during the site plan process.
Measure X.C.2	When possible, locate driveways and parking on the east and north sides of buildings to reduce heat buildup during hot afternoons.

Healthy Community Element

Policy HC 6.1	Support regional efforts to improve air quality through energy efficient technology, use of alternative fuels, and land use and transportation planning.
Policy HC 6.2	Support regional water quality efforts that balance water conservation, use of recycled water, and best practices in watershed management.
Policy HC 6.3	Promote measures that will be effective in reducing emissions during construction activities.

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

Perris Municipal Code

The Perris Municipal Code does not contain provisions relevant to greenhouse gases.

PVCCSP Standards and Guidelines and PVCCSP EIR Mitigation Measures

There are no specific standards or guidelines related to greenhouse gases identified within the PVCCSP; however, section 13.3.5 does require each new entitlement to attempt to achieve LEED certification:

13.3.5 LEED Certification Eligibility

- LEED Certification Eligibility is based on LEED New Construction and the California Green Building Code (part 11 of Title 24). LEED has four levels of certification: Certified, Silver, Gold, and Platinum. The Project proponent must indicate a commitment to reach a particular level of LEED certification prior to project approval. At a minimum, the City will mandate that any new entitlement shall attempt to achieve a "Certified" status. For each level of LEED Certification that the project proponent intends to meet in excess of "certified" status, the City shall reward a corresponding level of incentive.

Additionally, the PVCCSP EIR includes various mitigation measures to ensure that projects located within the PVCC area identify GHG impacts from construction and operation and mitigate any potential impacts appropriately. Relevant mitigation measures from the PVCCSP EIR address GHG emissions. The following such PVCCSP EIR mitigation measures are applicable to new warehouse projects:

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

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

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

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

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

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

MM Air 12 Where transport refrigeration units (TRUs) are in use, electrical hookups will be installed at all loading and unloading stalls in order to allow TRUs with electric standby capabilities to use them.

MM Air 13 In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD's Carl Moyer Program, or other state programs that restrict operations to "clean" trucks, such as 2007 or newer model year or 2010 compliant vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. If trucks older than 2007 model year would be used at a facility with three or more dock-high doors, the developer/successor-in-interest shall require, within one year of signing a lease, future tenants to apply in good-faith for funding for diesel truck replacement/retrofit through grant programs such as the Carl Moyer, Prop 1B, VIP [On-road Heavy Duty Voucher Incentive Program], HVIP [Hybrid and Zero- Emission Truck and Bus Voucher Incentive Project], and SOON [Surplus Off-Road Opt-in for NOx] funding programs, as identified on SCAQMD's website (http://www.aqmd.gov). Tenants would be required to use those funds, if awarded.

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

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

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

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

Coordination with RTA as required by PVCCSP EIR mitigation measure **MM Air 18** has been completed. In an email dated February 1, 2022, the RTA indicated that no bus stop is required at the Project site.

Perris and Climate Action Plan

The Perris Climate Action Plan (CAP) was adopted by the City Council (Resolution Number 4966) on February 23, 2016. The Perris CAP was developed to address global climate change through the reduction of harmful GHG emissions at the community level, and as part of California's mandated statewide GHG emissions reduction goals under AB 32. The Perris CAP, including the GHG inventories and forecasts contained within, is based on WRCOG's Subregional CAP. The Perris CAP utilized WRCOG's analysis of existing GHG reduction programs and policies that have already been implemented in the subregion and applicable best practices from other regions to assist in meeting the 2020 subregional reduction target. The Perris CAP reduction measures were based on their GHG reduction potential, cost-benefit characteristics, funding availability, and feasibility of implementation in the City of Perris.

The Perris CAP used an inventory base year of 2010 and included emissions from the following sectors: residential energy, commercial/industrial energy, transportation, waste, and wastewater. The Perris CAP's 2020 reduction target is 15% below 2010 levels, and the 2035 reduction target is 47.5% below 2010 levels. The City of Perris is expected to meet these reduction targets through implementation of statewide and local measures. However, the Perris CAP did not demonstrate compliance with the statewide GHG goal established by SB 32 for 2030 because it was adopted prior to SB 32.

5.4.3 Design Considerations

Design considerations refer to ways in which the proposed Project would reduce potential impacts to greenhouse gases. The PVCCSP includes Standards and Guidelines relevant to the analysis of GHG impacts summarized below, which are incorporated as part of the proposed Project; as such, they are assumed in the analysis presented in this section. The PVCCSP requires each entitlement to attempt to LEED certification. The Project is proposed to implement concepts of efficient design and material use that are consistent with Silver LEED Certification Levels. As stated in the Project Description of this Draft EIR (*Section 3.3.6*), the Project would meet or exceed all applicable standards under California's Green Building Code (CALGreen) and the Building Energy Efficiency Standards contained in Title 24 in effect at the time that the building permits are issued. This will be accomplished by incorporating, at a minimum, the following features or other features that are equally efficient to reduce greenhouse gas emissions:

Energy Efficiency

- Design building shells and components, such as windows, roof systems and electrical systems to meet California Title 24 Standards for nonresidential buildings.

- Design buildings to achieve U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) features for potential certification. This includes design considerations related to the building envelope, heating, ventilation, and air conditioning (HVAC), lighting, and power systems. Additionally, architectural expressions, such as roofs and windows in the buildings would relate to conserving energy.

- Install energy efficient light-emitting diodes (LED) lighting on the site. Provide skylights for natural daylight to reduce the lighting load, therefore saving energy. Lighting would incorporate motion sensors that turn them off when not in use.

- Meet City minimum landscape requirements and provide adequate landscape shade for the site to reduce energy use.

- Install light-colored roofing materials over office area spaces and light-colored paving materials.

- For future office space, install energy efficient HVAC systems (seasonal energy efficiency ratio (SEER) 13), appliances and equipment, and control systems that are Energy Star rated.

- For future office improvement, refrigerants and HVAC equipment would be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global climate change. Ventilation and HVAC systems would be designed to meet or exceed the minimum outdoor air ventilation rates described in the American Society of Heating, Refrigeration, and Air Conditioning Engineers standards and/or per California Title 24 requirements.

- Incorporate Energy Star rated space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.

Water Conservation and Efficiency

- Surface parking lots would be landscaped in accordance with City standards to reduce heat island effect.

- Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls and sensors for landscaping according to the California Department of Water Resources Model Efficient Landscape Ordinance and Chapter 19.70 (Landscaping) of the Perris Municipal Code.

- Design buildings to be water-efficient. Install water-efficient fixtures in accordance with Section 5.303 of the California Green Building Standards Code Part 11.

- Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff in accordance with City Standards.

- Provide education about water conservation and available programs and incentives to the building operators to distribute to employees.

Solid Waste Measures

- Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1 of the California Green Building Standards Code Part 11.

- Provide storage areas for recyclables and green waste and adequate recycling containers located in readily accessible areas in accordance with Section 5.410.1 of the California Green Building Standards Code Part 11.

- The property operator would provide readily available information provided by the City for employee education about reducing waste and available recycling services.

Transportation and Motor Vehicles

- Limit idling time for commercial vehicles to no more than five minutes per Title 13 of the California Code of Regulations, Section 2485.

- Provide electric vehicle (EV) infrastructure and facilitate EV charging in accordance with Section 5.106.5.3, Electric Vehicle Charging Requirements, of the California Green Building Standards Code Part 11. Accordingly, the Project would provide a minimum of 35 EV-capable parking spaces and at least 12 of these spaces would be equipped with EV charging stations at Project opening.[4]

- Signage shall be posted onsite directing truck drivers to use existing City truck routes on Harley Knox Boulevard.

- Provide Class II bike lanes on Harley Knox Boulevard, within the Project's frontage, per the City's Active Transportation Plan.

- Provide adequate bicycle parking near building entrances to promote cyclist safety, security, and convenience in compliance with Section 5.106.4 of the California Green Building Standards Code Part 11 and standard City code requirements.

Onsite Equipment and Loading Docks

- The Project owner would inform building operators of existing requirements to turn off equipment, including heavy-duty equipment, motor vehicles, and portable equipment, when not in use for more than 5 minutes. Truck idling shall not exceed 5 minutes in time. All facilities would post signs (both interior and exterior facing signs, including signs directed at all dock and delivery areas) requiring that trucks shall not be left idling for more than 5 minutes pursuant to Title 13 of the California Code of Regulations, Section 2485, which limits idle times to not more than five minutes and to report violations to California Air Resources Board, the South Coast Air Quality Management District, and the building manager.

- Service equipment (i.e., yard trucks and forklifts) used within the site shall be electric with the necessary electrical charging stations provided or powered by other alternative technology.

Construction

- Require Construction Equipment to Turn Off When Not in Use per Title 13 of the California Code of Regulations, Section 2449.

- Use regionally produced and/or manufactured building materials, where feasible, for Project construction.

[4] These numbers are based on the current requirements of Section 5.106.5.3.1 of the 2022 CALGreen Code. The 2025 CALGreen Code takes effect on January 1, 2026 and the Project would need to provide at least 18 spaces with EV chargers at the time of opening if its building permits are approved after 2025.

- Use “green” building materials where feasible, such as those materials that are resource efficient and recycled and manufactured in an environmentally friendly way.

5.4.4 Comments Received in Response to the Notice of Preparation

One comment letter was received related to greenhouse gas in response to the Notice of Preparation. The comment letter was received from the South Coast AQMD. The comment letter is identified in **Table 2.0 A – Written Comments Received During the Notice of Preparation Comment Period** and included in its entirety in Appendix A of this Draft EIR.

Four verbal comment(s) were also received during the June 18, 2025, Draft EIR public scoping meeting. The verbal comment(s) received are summarized in **Table 2.0-B – Verbal Comments Received During the Draft EIR Scoping Meeting**. All greenhouse gas related comments are addressed in this Section.

5.4.5 Thresholds of Significance

The City of Perris has not established local CEQA significance thresholds and defers to the thresholds of significance identified in Appendix G to the *CEQA Guidelines*.

As identified in this Initial Study prepared for this Project, implementation of the proposed Project could have potentially significant impacts in the following areas and these topics are addressed in this Draft EIR:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

5.4.6 Environmental Impacts Before Mitigation

Threshold A: *Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

In December 2008, the South Coast AQMD adopted an interim GHG significance threshold for stationary source projects where South Coast AQMD is the lead agency. The South Coast AQMD’s interim GHG significance threshold uses a tiered approach to determining significance. Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA. Tier 2 consists of determining whether or not the project is consistent with a GHG reduction plan that may be part of a local general plan, for example. Tier 3 establishes a screening significance threshold level to determine significance, which corresponds to 10,000 $MTCO_2e$ emissions per year for stationary sources at industrial facilities. This threshold was based on the review of 711 CEQA projects. The South Coast AQMD found that use of the 10,000 $MTCO_2e$ threshold would result in a capture rate of 90% for all new or modified projects. A 90% emission capture rate means that 90 percent of total emissions from all new or modified stationary source projects would be subject to some type of CEQA analysis. Tier 4, to be based on performance standards, is yet to be developed. Under Tier 5 the project proponent would allow offsets to reduce GHG emission impacts to less than the proposed screening level.

The South Coast AQMD has continued to consider adoption of significance thresholds for residential and general development projects. The most recent proposal issued in September 2010 uses the

following tiered approach to evaluate potential GHG impacts from various uses. Under option 1, separate screening thresholds are proposed for residential projects (3,500 $MTCO_2e$ per year), commercial projects (1,400 $MTCO_2e$ per year), and mixed-use projects (3,000 $MTCO_2e$ per year). Under option 2 a single numerical screening threshold of 3,000 $MTCO_2e$ per year would be used for all non-industrial projects. These thresholds have not been adopted by the South Coast AQMD or distributed for widespread public review and comment, and the working group tasked with developing the thresholds has not met since September 2010. The future schedule and likelihood of threshold adoption is uncertain.

If the CARB adopts statewide significance thresholds, South Coast AQMD staff plans to report back to the South Coast AQMD Governing Board regarding any recommended changes or additions to the South Coast AQMD's interim threshold.

Under CEQA, the City has discretion to select an appropriate significance criterion that is based on substantial evidence. The South Coast AQMD's adopted threshold of 10,000 $MTCO_2e$ per year for industrial stationary source emissions is commonly selected as the significance criterion. The South Coast AQMD adopted industrial threshold is commonly selected because warehouses, such as the proposed Project, are more comparable to an industrial use than the other land uses such as commercial or residential. This is supported by information released by the South Coast AQMD working group. The minutes from the January 2009 working group state that the GHG threshold adopted by the Governing Board applies to both emissions from construction and operational phases plus indirect emissions (electricity, water use, etc.) and defines that an industrial project includes "[s]torage and distribution (e.g., warehouse, transfer facility, etc.)."[5] Minutes from the September 28, 2010 working group meeting subsequently indicate that, at that time, the South Coast AQMD was also proposing to extend the industrial GHG significance threshold for use by all lead agencies.[6] The only update to the South Coast AQMD's GHG thresholds since 2010 is that the 10,000 $MTCO_2e$ per year threshold for industrial projects is now included in the South Coast AQMD's March 2023 South Coast AQMD Air Quality Significance Thresholds document that is published for use by local agencies. (AQMD 2023)

In addition, the warehouse land use is categorized as industrial in both CalEEMod and the Institute of Transportation Engineers (ITE) Trip Generation Manual which is commonly used in preparation of traffic studies. The use of the10,000 $MTCO_2e$ per yr as a significance threshold is also widely used by various other cities in the South Coast Air Basin. Use of this threshold is also consistent with Approach 2 of the non-zero thresholds provided in the California Air Pollution Control Officer's Association *CEQA and Climate Change* guidance document.[7] The City's evaluation of impacts under the 10,000 $MTCO_2e$ per year threshold is also considered to be conservative since it is being applied to all of the GHG emissions generated by a proposed development project (i.e., area sources, energy sources, vehicular sources, solid waste sources, and water sources) whereas the South Coast AQMD's adopted 10,000 $MTCO_2e$ per year threshold applies only to the new stationary sources generated at industrial facilities. As such, this threshold is utilized herein to determine if emissions of GHG from this Project would be significant. The

[5] http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-8/ghg-meeting-8-minutes.pdf

[6] http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf

[7] https://www.ourair.org/wp-content/uploads/CAPCOA-CEQA-and-Climate-Change.pdf

South Coast AQMD significance thresholds also evaluate construction emissions by amortizing them over an expected project life of 30 years.

Short-Term Analysis

The CalEEMod model calculates GHG emissions from fuel usage by construction equipment and construction-related activities, like construction worker trips, for the Project. The estimated construction period for the proposed Project is approximately 11.5 months. Construction of the Project was modeled starting in June 2025 which represents a worst-case analysis. The default parameters within CalEEMod were used and these default values reflect a worst-case scenario, which means that Project emissions are expected to be equal to or less than the estimated emissions. The off-road equipment to be used for each construction activity is shown below and represents CalEEMod program defaults. Each piece of equipment listed below is assumed to operate 8 hours per day:

Construction Activity	Off-Road Equipment	Unit Amount
Site Preparation	Rubber Tired Dozer	3
	Tractor/Loader/Backhoes	4
Grading	Graders	1
	Excavators	2
	Tractors/Loaders/Backhoes	2
	Rubber Tired Dozer	1
	Scrapers	2
Building Construction	Forklifts	3
	Generator Set	1
	Crane	1
	Welder	1
	Tractor/Loader/Backhoe	3
Paving	Paver	1
	Paving Equipment	1
	Rollers	1
Architectural Coatings	Air Compressors	1

CalEEMod also calculates the indirect GHG emissions related to electricity consumption. The CalEEMod output results for construction-related GHG emissions present the GHG emissions estimates for the Project for CO_2, methane (CH_4), nitrous oxide (N_2O), Refrigerants (R), and CO_2e.[8] The following table summarizes output results and presents the GHG emissions estimates for the Project in metric tons per year.

[8] CO_2e is the sum of CO_2 emissions estimated plus the sum of CH_4, N_2O, and refrigerants emissions estimated multiplied by their respective global warming potential (GWP).

Table 5.4-D – Project Construction Equipment GHG Emissions

Year	Metric Tons per year				
	Total CO_2	Total CH_4	Total N_2O	R	Total CO_2e
2025	535.00	0.02	0.03	0.41	544.00
2026	371.00	0.01	0.02	0.35	379.00
Total	**906.00**	**0.03**	**0.05**	**0.76**	**923.00**
				Amortized	**30.77**

Source: WEBB-A, Table 7

Evaluation of the table above indicates that an estimated 923.00 $MTCO_2e$ would occur from Project construction equipment over the course of the estimated construction period. The draft South Coast AQMD GHG threshold Guidance document released in October 2008 recommends that construction emissions be amortized for a project lifetime of 30 years to ensure that GHG reduction measures address construction GHG emissions as part of the operational reduction strategies. Therefore, the total GHG emissions from Project construction were amortized and are included below in **Table 5.4-D – Total Project-Related GHG Emissions**.

Long-Term Analysis

Area Source Emissions

CalEEMod estimates the GHG emissions associated with area sources which include landscape equipment emissions, architectural coating, consumer products, and hearths. Landscape equipment servicing the Project site create CO_2 resulting from fuel combustion based on the Project's land uses. Consumer products consist of consumer use of solvents and personal care products and architectural coatings consist of an average building square footage to be repainted each year. **Table 5.4-F** summarizes the Project's area source emissions.

Energy-Related Emissions

CalEEMod estimates the GHG emissions associated with building electricity and natural gas usage (non-hearth) for each land use type. Electricity and natural gas used in buildings is typically generated at an off-site power plant which indirectly generates GHG emissions. The default energy usage values used in CalEEMod are based on the California Energy Commission-sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey studies and reflect 2019 Title 24 improvements. **Table 5.4-E – Energy-Related GHG Emissions**, below, summarizes the GHG emissions estimates reported by CalEEMod for the Project.

GHG emissions from the operation of electric forklifts and yard trucks were calculated outside of CalEEMod using data from South Coast AQMD for forklift and yard truck usage, annual forklift electricity consumption from the Electric Power Research Institute, and the forecast carbon intensity data from CalEEMod for the electricity provider (Southern California Edison (SCE)). The Project is estimated to use approximately 66 forklifts, based on an average usage of 0.12 forklifts per 1,000 square feet of building area provided by South Coast AQMD (549,788/1,000 x 0.12 = 65.97). The typical annual electricity usage from electric forklifts is between 12,960 to 25,932 kilowatt-hours (kWh). The mid-point of 19,446 kWh per year per forklift was used, which equals approximately 992 megawatt-hours (MWh) per year. The Project is estimated to use approximately two-yard trucks, based on an average of 3.6-yard trucks per million square feet provided by South Coast AQMD (0.55 million square feet x 3.6 = 1.98). The estimated annual electricity usage from each electric yard truck is 84 kWh per day which equals approximately 61,320 KWh per year or 61 MWh per year for the Project (84 kWh x 2 x 365)/1,000 = 61 MWh).

The GHG emissions from electricity usage from the future electric vehicle (EV) charging stations serving the Project site also estimated outside CalEEMod. It was conservatively assumed that up to 44 EV charging spaces are operating.[9] Emissions were estimated using data from the South Coast AQMD for EV charging station usage and the CalEEMod default SCE carbon intensity data. It was assumed that each designated EV charging space would contain one charger and, based on South Coast AQMD[10] data, that each charger would be a 50-kilowatt charger used approximately 10 hours per day or five separate two-hour charging events. Based on these assumptions, each EV charger would use approximately 450 kWh of electricity per day.

The following table summarizes the GHG emissions estimates reported by CalEEMod for the Project based on the assumptions described previously.

Table 5.4-E – Energy-Related GHG Emissions

Source	Metric Tons per year				
	CO_2	CH_4	N_2O	R	Total CO_2e
Electricity[1]	449.00	0.04	0.01	--	1,805.88
Natural Gas	557.00	0.05	0.00	--	558.00
Total	**1,006.00**	**0.09**	**0.01**	**--**	**2,363.88**

Source: WEBB-A, Table 8
Note: Emissions reported as zero are rounded and not necessarily equal to zero.
[1]Total $MTCO_2E$ emission include building energy usage estimated in CalEEMod plus the estimated forklift, yard truck, and EV charging station electricity usage calculated outside of CalEEMod.

Mobile Source Emissions

CalEEMod estimates the annual GHG emissions from Project-related vehicle usage based on trip generation data contained in defaults or in a project-specific traffic analysis. CalEEMod also estimates the GHG emissions from refrigerant leakage from vehicle air conditioning (A/C) systems. The trip generation rate and fleet mix were adjusted based on the rates and ratios found in the Traffic Study (Appendix H of this Draft EIR). Trip length data was based on CalEEMod defaults for passenger cars and the distance of 40 miles for Project trucks was used, which is recommended by the City and based on South Coast AQMD's *Final Staff Report for Proposed Rule 2305 and Rule 316.*[11] **Table 5.4-F – Total Project-Related GHG Emissions** shows the mobile source emissions from the Project.

Solid Waste Emissions

CalEEMod also calculates the GHG emissions associated with the disposal of solid waste into landfills based on default data contained within the model for waste disposal rates, composition, and the characteristics of landfills throughout the state. A large percentage of this waste would be diverted from

[9] The Project's site plan currently designates a minimum 35 EV charging spaces, of which 12 spaces would be equipped with EV charging stations. Therefore, the EV charging emission resulting from the Project are overstated.

[10] South Coast Air Quality Management District, *Board Meeting Agenda No. 27, May 7, 2021, Attachment I, Final Staff Report, Proposed Rule 2305 – Warehouse Indirect Source Rule - Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305.* (Available at http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10, accessed June 2025.)

[11] South Coast Air Quality Management District, Board Meeting Agenda No. 27, May 7, 2021, *Attachment I, Final Staff Report, Proposed Rule 2305 – Warehouse Indirect Source Rule - Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305*. (Available at http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10, accessed June 2025.)

landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted would be disposed of at a landfill. **Table 5.4-F – Total Project-Related GHG Emissions** (on the following page) shows the solid waste emissions from the Project.

Water-Related Energy Usage

Electricity is also indirectly used in water supply, treatment, and distribution, as well as wastewater treatment in Southern California and plays a large role in GHG production.

There are three processes necessary to supply potable water to urban users (i.e., residential, commercial, and industrial): (1) supply and conveyance of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, the wastewater is treated and either reused as reclaimed/recycled water or returned to the environment. CalEEMod calculates the GHG emissions from these processes based on default emissions factors and water/wastewater generation rates for a project's location. Default values were used for electricity intensity factor associated with the supply and conveyance of water from its source which assumes that the water is being imported from Northern California. Total water demand was obtained from the Eastern Municipal Water District 2015 Water Facility Master Plan Update[12], using the average daily demand. Outdoor water demand was estimated using CalEEMod default data. The indoor water demand was calculated by subtracting the total water demand by the outdoor water demand. **Table 5.4-F – Total Project-Related GHG Emissions** shows the GHG emissions from water-related energy usage for the Project.

Stationary Source Emissions

Stationary source emissions are generated by equipment such as emergency generators and fire pumps. For this analysis, it was assumed a diesel-powered fire water pump would be rated at 100 horsepower and is estimated to operate for up to one hour per day, one day per week, up to 50 hours per year for routine maintenance and testing. Emissions were calculated using CalEEMod default emission factors and the results are shown in **Table 5.4-F – Total Project-Related GHG Emissions.**

Total Project GHG Emissions

As shown on **Table 5.4-F – Total Project-Related GHG Emissions**, using all the emissions quantified above, the total GHG emissions generated from the Project is approximately 5,651.26 $MTCO_2e$ per year which includes construction-related emissions amortized over a typical project life of 30 years.

[12] Eastern Municipal Water District, *2015 Water Facility Master Plan Update, November 7, 2016*.

Table 5.4-F – Total Project-Related GHG Emissions

Source	Metric Tons per year				
	CO_2	CH_4	N_2O	R	Total CO_2e
Amortized Construction	--	--	--	--	30.77
Area	11.20	0.00	0.00	--	11.20
Energy	1,006.00	0.09	0.01	--	2,363.88
Mobile	2,958.00	0.09	0.25	4.15	3,038.00
Solid Waste	46.10	4.61	0.00	--	161.00
Water	26.40	0.56	0.01	--	44.50
Stationary	1.90	0.00	0.00	0.00	1.91
Total	**4,049.60**	**5.35**	**0.27**	**4.15**	**5,651.26**

Source: WEBB-A, Table 9
Note: Emissions reported as zero are rounded and not necessarily equal to zero

Conclusion: The total GHG emissions from the Project do not exceed the South Coast AQMD interim threshold of level of 10,000 $MTCO_2e$ per year for industrial projects. Therefore, the proposed Project would not generate GHG emissions, directly or indirectly, that have a significant effect on the environment. No Project-specific mitigation is required. Although not considered to be significant, implementation of the applicable PVCCSP EIR air quality mitigation measures **MM Air 2**, **MM Air 4** through **MM Air 7**, **MM Air 11** through **MM Air 14**, **MM Air 18, MM Air 19** and **MM Air 20**, as discussed in *Section 5.4.2 - Related Regulations* above, would further reduce the GHG emissions associated with the proposed Project.

In addition, on May 7, 2021, the Governing Board of the South Coast AQMD adopted Rule 2305, the Warehouse Indirect Source Rule. Under this rule, the owners and operators of warehouses greater than 100,000 square feet are required to directly reduce NO_x and particulate matter emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities. The warehouse rule is a menu-based points system requiring warehouse operators to annually earn a specified number of points. These points can be earned by completing actions from a menu that can include acquiring and using natural gas, Near-Zero Emissions and/or Zero-Emissions on-road trucks, zero-emission cargo handling equipment, solar panels or zero-emission charging and fueling infrastructure, or other options. The South Coast AQMD expects this rule to reduce emissions from warehouse uses by 10-15 percent. When developed, the proposed warehouse would be subject to this rule, thus further reducing the GHG emissions of the proposed Project.

Threshold B: *Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases?*

Pursuant to Section 15064.4 of the *CEQA Guidelines*, a lead agency may rely on qualitative analysis to determine the significance of impacts from GHG emissions. A project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project. The Project's consistency with the 2022 Scoping Plan, is discussed below as well as the Project's consistency with the Perris CAP. It should be noted that the Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 and 2017 Scoping Plan is not necessary since both of these plans have been superseded by the 2022 Scoping Plan.

The 2022 Scoping Plan sets a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045.The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. For example, current transportation sector measures are implemented by the manufacturers, which includes the Advanced Clean Cars II and the Low Carbon Fuel Standard. The Project is also subject to building code requirements under the building energy efficiency standards (Title 24) and green building standards (CALGreen) that improve building energy efficiency and promote transportation electrification. New buildings are required to comply with the applicable building code requirements and standards in place at the time building permit documentation submittals are made. Additionally, the City of Perris adopted a CAP in 2016. The Perris CAP includes local measures that achieve the GHG reduction targets of AB 32 for target year 2020 for the City. Local measures in the Perris CAP include creation of an energy action plan to reduce citywide energy consumption; transportation measures that encourage alternative modes of transportation and reduced vehicle use; and solid waste measures that reduce landfilled solid waste in the City.

The Project would comply with the Perris CAP through compliance with the PVCCSP EIR mitigation measures identified previously in Threshold A, which would lessen the Project's contribution of GHG emissions from both construction and operation. It would also be subject to South Coast AQMD Rule 2305, the Warehouse Indirect Source Rule, which would also lessen the contribution of GHG emissions from Project operation. The Project would not conflict with local strategies and state/regional strategies listed in the Perris CAP.

Conclusion: As described in Threshold A, and the additional discussion below, the proposed Project would not generate a significant amount of GHG emissions. The Project's significance with respect to consistency with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emission have been evaluated below and addressed for each sector. As discussed below, the Project does not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions and potential impacts would be **less than significant without mitigation required**.

Transportation

Approximately 54 percent of the Project's opening year GHG emissions in **Table 5.4-F** are from transportation (mobile sources), heavy-duty trucks in particular. Transportation emissions are heavily regulated at the source, including, but not limited to engine emissions standards and fuel requirements. Because these regulations and policies reduce GHG emissions at the source, the Project would be subject to and therefore not conflict with these transportation measures.

State Regulations

Adopted regulations that would reduce the Project's GHG emissions through engine emission standards and fuel requirements are described in detail in *Section 5.4.2*, above. These regulations include: AB 1493, or the Pavley Standard, that required CARB to adopt regulations to reduce GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 through 2016. These standards apply to all passenger and light-duty trucks used by customers, employees of and deliveries to the proposed Project site. The Low Carbon Fuel Standard regulation became fully effective in 2010 and reduced GHG emissions by reducing the carbon intensity of transportation fuels used in California by at least 10 percent by 2020. The proposed Project would benefit from these emissions reductions as they are implemented post 2020 from all operational mobile emissions sources. The Advanced Clean

Cars Program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming gases. Customers, employees of and deliveries to the proposed Project site would utilize these vehicles as they become available and further reduce GHG emissions.

As part of the Heavy-duty Vehicle Greenhouse Gas Regulation, CARB also implemented the Drayage Truck Regulation and Truck and Bus Regulation. These three regulations were collectively adopted to address and reduce emissions from trucks. Since the proposed Project has a large truck component, these regulations would aid in reducing GHG emissions from the Project.

Notably, the Cap-and-Trade Program covers transportation fuel suppliers to address emissions from fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. While the Cap-and-Trade Program technically covered fuel suppliers as early as 2012, they did not have a compliance obligation until 2015. The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. The point of regulation for transportation fuels is when they are supplied or delivered into commerce. Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all of GHG emissions from CEQA projects associated with VMT are covered by the Cap-and-Trade Program.

Since the proposed Project has a large mobile source component and Cap-and-Trade emission reductions are difficult to calculate on a project-level, the proposed Project's mobile source emissions are very conservative, making the total emission calculations conservative. The phase-in of the Cap-and-Trade Program compliance obligations for transportation fuel providers further reduces GHG emissions attributable to mobile sources, beyond the GHG emissions reductions achieved and modeled by the Pavley Standard and Low Carbon Fuel Standard.

Regional and Local Measures

Southern California is a major hub for importing and exporting goods. The SCAG highway and local roadway network serves most intermodal facilities including seaports, airports, railyards, cross-border, and industrial facilities supporting manufacturing, retail and wholesale trade, transportation and warehousing and all other goods movement sectors. SCAG estimates 80 percent of local tonnage and 75 percent of tonnage entering, exiting, and pass through the region being moved by trucks, major freight corridors and local roadways, much of which travels through inland Southern California, including western Riverside County. However, the many warehouses and distribution facilities employ non-passenger vehicles that contribute to GHG emissions. At the state level, more standards are being implemented to increase vehicle efficiencies and Connect SoCal 2024 and the South Coast AQMD are supporting greater penetration of low-emission trucks in the region. While goods will continue to be moved to support local and regional economies, electrification and other low-emission technologies installed in vehicles can reduce the GHG emissions of goods movement. These investments include both policies as well as physical improvements such as "truck climbing" lanes, funded by the Riverside County Transportation Commission. GHG reduction potentials from these anticipated improvements were incorporated into the City's CAP and would be applicable to the proposed Project GHG reduction potential based on the large amount of goods movement associated with the Project.

As explained above, the Inland Empire is the heart of the region's warehouse Goods Movement network for goods that enter the Ports and are moved east to the rest of the country. The entire Goods

Movement network is based on the Ports of Los Angeles/Long Beach and some truck trips generated by the Project are assumed to come from the Ports of Los Angeles/Long Beach. The Ports have adopted several plans and policies to reduce GHG emissions including the Green LA Plan, the Port of LA CAP, the Long Beach Sustainable City Action Plan, and the San Pedro Bay Ports Clean Air Action Plan.

The Perris CAP also identifies improvements, such as express lanes and congestion pricing, which would reduce GHG emissions by alleviating freeway congestion. Reduced congestion would cause fewer delays for the distribution trucks and commuting employees traveling to the proposed Project site and would increase fuel efficiency.

Additionally, as described in Measure SR-12 of the Perris CAP, the WRCOG subregion is covered by SCAG's regional plug-in electric vehicle readiness plan to identify viable locations for charging stations, changes to development codes, and other strategies to encourage the purchase and use of electric vehicles. plug-in electric vehicle chargers are already being installed in the WRCOG subregion to promote alternative-fuel vehicles as one strategy to reduce GHG emissions associated with passenger vehicles. Once these stations are established, employees that commute to the proposed Project site would have more incentive to invest in alternatively fueled vehicles with lower GHG emissions than fossil fueled vehicles. The City also plans to coordinate traffic signals along local arterials to provide smooth movement of traffic with minimal stops. As the City extends traffic signal coordination to additional roadways, GHG emissions will be reduced by reducing motorist stops and delays and lowering the amount of fuel needed to move a certain distance. Signal coordination also lessens congestion and resulting tail pipe emissions, which reduces GHG emissions and improves air quality. This would apply to both the trucks and employee passenger cars traveling on local streets.

The Perris CAP also identifies bicycle infrastructure improvements and increased bicycle parking as strategies to increase the viability of bicycling as an emission-free commute option. The proposed Project would benefit from these improvements and be able to expand alternative transportation options to commuting employees in order to further lower GHG emissions.

Project Design Features

Lastly, as described in *Section 5.4.3*, above, the Project would implement the following features which would further reduce the Project's GHG emissions from transportation:

- Limit idling time for commercial vehicles to no more than five minutes.
- Provide electric vehicle (EV) infrastructure and facilitate EV charging in accordance with Section 5.106.5.3, Electric Vehicle Charging Requirements, of the California Green Building Standards Code Part 11. Accordingly, the Project would provide a minimum of 35 EV-capable parking spaces and at least 12of these spaces would be equipped with EV charging stations at Project opening.[13]
- Provide Class II bike lanes on Harley Knox Boulevard, within the Project's frontage, per the City's Active Transportation Plan.

[13] These numbers are based on the current requirements of Section 5.106.5.3.1 of the 2022 CALGreen Code. The 2025 CALGreen Code takes effect on January 1, 2026 and the Project would need to provide at least 18 spaces with EV chargers at the time of opening if its building permits are approved after 2025.

- Provide adequate bicycle parking near building entrances to promote cyclist safety, security, and convenience in compliance with Section 5.106.4 of the California Green Building Standards Code Part 11 and standard City code requirements.

Energy

The second largest source, approximately 42 percent, of GHG emissions shown in **Table 5.4-E** from the Project is energy consumption from electricity and natural gas.

State Regulations

Energy-related emissions are also heavily regulated at the source, including, but not limited to energy efficiency standards and renewable energy requirements. Because these regulations and policies reduce GHG emissions at the source, the Project would be subject to, and therefore implement, these energy measures.

Applicable regulations that reduce GHG emissions through energy efficiency standards and renewable energy requirements, which were previously described above in *Section 5.4.2*, include: the Renewable Portfolio Standard; SB 1368; AB 1109; Title 24 building energy efficiency requirements, and the CALGreen Code.

As previously described above in *Section 5.4.2*, California's Renewable Portfolio Standard requires retail sellers of electric services to increase procurement from eligible renewable energy sources so that half of the state's electricity must be procured from renewable sources by 2030 and achieve 100 percent clean energy by 2045. Additionally, SB 1368 prohibits any retail seller of electricity in California from entering into a long-term financial commitment for baseload generation if the GHG emissions are higher than those from a combined-cycle natural gas power plant. As a customer of SCE, the proposed Project occupant would purchase from an increasing supply of renewable energy sources and more efficient baseload gene rations and thereby reduce GHG emissions. AB 1109, the Lighting Efficiency and Toxic Reduction Act, required the establishment of minimum energy efficiency standards for all general purpose lights. The proposed Project occupant(s) would use these more energy efficient lights and therefore use less electricity and lower GHG emissions in that regard.

The proposed Project is also subject to the CALGreen Code and Title 24 building energy efficiency requirements that offer builders better windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses. The current codes are the 2022 CALGreen Code and 2022 Building Energy Efficiency Standards. The Project would be subject to the Building Energy Efficiency Standards in effect at the time of building permit, which would further reduce energy consumption from the proposed Project.

Regional and Local Measures

The HERO Program is a public-private partnership administered by WRCOG, offering financing to business owners in the subregion for the installation of energy-efficient, renewable energy, and water conservation improvements. The proposed Project owner or occupant has the opportunity to participate in this program to aid in financing GHG-reducing energy efficient, renewable energy, and water conservation improvements. SCE also provides various energy savings programs including an energy audit tool and efficient lighting and appliance rebates that the proposed Project owner or occupant can participate in as a customer of SCE.

Project Design Features

The Project would include the following to meet or exceed any efficient energy standards,

- Design building shells and components, such as windows, roof systems and electrical systems to meet California Title 24 Standards for nonresidential buildings.
- Design buildings to achieve U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) features for potential certification. This includes design considerations related to the building envelope, heating, ventilation, and air conditioning (HVAC), lighting, and power systems. Additionally, the architectural expression such as roofs and windows in the buildings will relate to conserving energy.
- Install energy efficient light-emitting diodes (LED) lighting on the site. Provide skylights for natural day light to reduce the lighting load, therefore saving energy. Lighting will incorporate motion sensors that turn them off when not in use.
- Meet City minimum landscape requirements and provide adequate landscape shade for the site to reduce energy use.
- Install light-colored roofing materials over office area spaces and light-colored paving materials.
- For future office space, install energy efficient HVAC systems (seasonal energy efficiency ratio (SEER) 13), appliances and equipment, and control systems that are Energy Star rated.
- For future office improvement, refrigerants and HVAC equipment will be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global climate change. Ventilation and HVAC systems will be designed to meet or exceed the minimum outdoor air ventilation rates described in the American Society of Heating, Refrigeration, and Air Conditioning Engineers (ASHRAE) standards and/or per California Title 24 requirements.
- Incorporate Energy Star rated space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.

Water

As stated previously, GHG emissions also result from electricity consumption related to water supply, treatment, and distribution, as well as wastewater treatment. As shown in **Table 5.4-F**, the Project's GHG emissions related to water consumption are approximately 0.7 percent of total GHG emissions.

State Regulations

The Water Conservation Act of 2009 (SB X7-7) reduced per-capita urban water use by 20 percent by 2020. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water and it also reduces emissions from wastewater treatment.

As described above, the 2019 Title 24 standards included in the Project's emissions estimates differ from previous standards by requiring usage of less energy for water heating. Implementation of the CALGreen standards also reduce energy consumptions from water use by requiring the reduction of indoor potable water use from water saving fixtures and/or flow restrictors by the incorporation of sustainability features including installing water-efficient fixtures and appliances (e.g., California Environmental Protection Agency WaterSense labeled products). The proposed Project would be subject to the Title 24 standards in effect at the time of construction and therefore is at least as effective as the 2019 standards.

Regional and Local Measures

The Perris CAP water conservation and efficiency goal directly aligns with SB X7-7. While this is considered a state measure, it will be up to the local water retailers, jurisdictions, and water users to meet these targets. A number of policies have been established at the local level within the subregion requiring more efficient use of water, including landscaping ordinances that require native or low-irrigation landscaping.

Water service to the Project site would be provided by the Eastern Municipal Water District (EMWD), which has adopted a series of policies aimed at reducing water consumption within its jurisdiction. Current efforts that aid in implementing this goal include adoption of the EMWD's Water Efficient Landscape Ordinance and other efforts outlined in the EMWD's Urban Water Management Plan. Since the proposed Project would be subject to these regulations and ordinances, along with Title 24 standards, the Project would not conflict with any regional or local policy.

Project Design Features

- Surface parking lots would be landscaped in accordance with City standards to reduce heat island effect.

- Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls and sensors for landscaping according to the California Department of Water Resources Model Efficient Landscape Ordinance and Chapter 19.70 (Landscaping) of the Perris Municipal Code.

- Design buildings to be water-efficient. Install water-efficient fixtures in accordance with Section 5.303 of the California Green Building Standards Code Part 11.

- Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff in accordance with City Standards.

- Provide education about water conservation and available programs and incentives to the building operators to distribute to employees.

Waste Diversion

Disposal of solid waste in landfills contributes approximately three percent of GHG emissions from the Project (**Table 5.4-F**).

State Regulations

Implementation of the CALGreen Code and state measures reduce the amount of solid waste disposed of in landfills. The CALGreen Code requires jurisdictions to divert a minimum of 65 percent of their nonhazardous construction and demolition waste from landfills. The City of Perris reported a 51 percent waste diversion rate for the year 2004. In addition, SB 341 amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter. The proposed Project would be subject to these regulations and would utilize Project Design Features discussed below to meet CALGreen Code standards as well as SB 341's policy goal and thereby reduce GHG emissions.

Regional and Local Measures

The Perris CAP explains that diverting organic items from landfills helps to reduce landfill methane gas generation, and can help prolong the lifespan of area landfills. The City implements a collection system for food and paper waste, which the Project may have the opportunity to participate in. The City has the added bonus of CR&R Incorporated's anaerobic digester to accelerate the processing of household waste products.

Project Design Features

- Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1 of the California Green Building Standards Code Part 11.
- Provide storage areas for recyclables and green waste and adequate recycling containers located in readily accessible areas in accordance with Section 5.410.1 of the California Green Building Standards Code Part 11.
- The property operator would provide readily available information provided by the City for employee education about reducing waste and available recycling services.

5.4.7 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines Section15126.4). Mitigation measures were evaluated for their ability to reduce or eliminate impacts. Although the potential GHG impacts of the proposed Project would be less than significant, the Project would be required to implement PVCCSP EIR mitigation measures **MM Air 2, MM Air 4** through **MM Air 7, MM Air 11** through **MM Air 14, MM Air 18, MM Air 19,** and **MM Air 20** as discussed in *Section 5.4.2.* No Project-specific mitigation is required beyond those required by the PVCCSP EIR mitigation measures listed above.

5.4.8 Summary of Environmental Effect After Mitigation Measures are Implemented

The proposed Project would not result in any significant GHG impacts and no mitigation is required beyond those required by the PVCCSP EIR mitigation measures listed above.

5.5 Land Use and Planning

The focus of the following discussion relates to the Project site and existing land uses in the surrounding area and the evaluation of the proposed Project's consistency with the Perris Comprehensive General Plan 2030 (Perris GP 2030), Perris Municipal Code, Zoning and the Perris Valley Commerce Center Specific Plan (PVCCSP). Cumulative impacts are discussed in *Section 7.0 – Cumulative Impact Analysis* of this Draft EIR.

The following references were used in the preparation of this section of the Draft EIR:

- City of Perris, *Perris Comprehensive General Plan 2030,* originally approved July 12, 2005. (Available at the City of Perris and at https://www.cityofperris.org/departments/development-services/general-plan, accessed July 14, 2025.) [Cited as Perris GP 2030]
- City of Perris, *Perris Valley Commerce Center Specific Plan Amendment No. 14*, approved October 23, 2023 (Ordinance 1435) (PVCCSP). (Available at City Planning Department.) [Cited as PVCCSP]
- City of Perris, *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report*, State Clearing house # 2009081086 November 2011, certified January 10, 2012. (Available at the City of Perris.) [Cited as PVCCSP EIR]
- Mead & Hunt, *March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan*, November 13, 2014. (Available at https://rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700 , accessed July 10, 2025.) [Cited as March ARB/IPA ALUCP]
- Southern California Association of Governments, Connect SoCal - *2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy*, adopted April 4, 2024, Amended September 5, 2024. (Available at https://scag.ca.gov/sites/default/files/2024-09/24-2987-final-amendment-01-connect-socal-2024.pdf, accessed July 14, 2025.) [Cited as SCAG 2024]

5.5.1 Setting

The Project site is located in the City of Perris, at the northwest corner of Harley Knox Boulevard and Indian Avenue, within the northern portion of the Perris Valley Commerce Center (PVCC). Industrial uses surround the Project site on the east, Perris Valley Storm Drain followed by industrial uses within the City of Moreno Valley to the north, manufacturing and vehicle auction/storage to the south, and vacant land to the west.

As previously stated in *Section 3.0 - Project Description* of this Draft EIR, the Project site is currently unimproved and vacant. The southeast corner was previously developed with a 41,680-square-foot industrial building and associated parking lot and ornamental vegetation landscaping; however, that structure has been removed from the Project site. The existing vegetation is disturbed and receives frequent weed abatement. The Project site is generally surrounded by Harley Knox Boulevard to the south, Indian Avenue to the east, Harley Knox Boulevard/E Oleander Ave to the north and Harley Knox Boulevard to the west.

General Plan and Zoning Designation

The Project site land use designation under the City of Perris General Plan 2030 Land Use Element is PVCC SP – Perris Valley Commerce Center Specific Plan. The proposed Project site is within the northern portion of the PVCC area. The Perris Valley Commerce Center Specific Plan (PVCCSP) was adopted by the City of Perris on January 12, 2012 (Ordinance No. 1284) and has been amended 14 times; the latest amendment was adopted on October 23, 2023 (Ordinance No. 1435). **Figure 3.0-5 – General Plan Land Use Designation** and **Figure 3.0-6 – Specific Plan Zoning Designation** depicts the PVCCSP Land Use and zoning designation and the Project site boundary. As shown, the Project site is designated for General Industrial (GI). The General Industrial zone provides for industrial uses which may support a wide range of manufacturing and non-manufacturing uses, from large-scale warehouse and warehouse/distribution facilities to outdoor industrial activities.

The Project site is surrounded by areas also designated as General Industrial to the south, Light Industrial (LI) to the east and to the north the City of Moreno Valley zones Industrial/Business Park and Open Space/Park. (**Figure 3.0-6**).

5.5.2 Related Regulations

Federal Regulations

No federal regulations would be applicable to land use and planning with respect to the proposed Project.

State Regulations

Article XI, Section 7 of the California State Constitution is the primary authority for cities and counties to regulate land use. California State Planning and Land Use Law (Government Code Section 65000 et seq.) sets forth minimum standards to be observed in local land use regulatory practices, reserving in cities and counties the maximum degree of control in such matters.

Regional Regulations

March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan

The Riverside County Airport Land Use Commission (ALUC) is the lead agency responsible for airport land use compatibility planning in Riverside County. The fundamental purpose of ALUC is to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses. The basic function of the airport land use compatibility plans is to promote compatibility between airports and the land uses that surround them. Compatibility plans serve as a tool for use by airport land use commissions in fulfilling their duty to review proposed development plans for airports and surrounding land uses. Additionally, compatibility plans set compatibility criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances and to landowners in their design of new development. On November 13, 2014, ALUC adopted the March Air Reserve Base (March ARB)/Inland Port Airport (IPA) Land Use Compatibility Plan (LUCP); hereinafter referred to as the March ARB/IPA ALUCP. The compatibility zones and associated criteria set forth in the March ARB/IPA ALUCP provide noise and safety compatibility protection. The Project site is located within Zones A, B1-APZ I, B2, and C1 of the March ARB/IPA ALUCP. A discussion of Project consistency with the March ARB/IPA ALUCP is provided in Section 6.9 - Hazards and Hazardous Materials, of the Initial Study located in Appendix A of this Draft EIR.

The City of Perris amended the City of Perris General Plan 2030, Perris Municipal Code, and PVCCSP to include an Airport Overlay Zone (AOZ), consistent with the land uses and densities outlined in the ALUCP. As such, projects that are consistent with the Perris Municipal Code and AOZ and outside of the Accident Potential Zone I and II can be reviewed by City staff and are not subject to ALUC review.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization for six counties: Riverside, Los Angeles, Orange, San Bernardino, Ventura, and Imperial. The region encompasses a population exceeding 19 million persons in an area of more than 38,000 square miles. As the designated Metropolitan Planning Organization, the federal government mandates that SCAG researches and prepares plans for transportation, growth management, hazardous waste management, and air quality. Additionally, SCAG provides informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies.

Connect SoCal

The SCAG regional council adopted *Connect SoCal 2024 – the 2024-2025 Regional Transportation Plan/Sustainable Communities Strategy* on April 4, 2024 and subsequently amended it on September 5, 2024. Connect SoCal 2024 is a long-range visioning plan that balances future mobility, communities, environment, and economy (SCAG 2024, p. 12). The goals for Connect SoCal 2024 are designed to achieve the vision of a healthy, prosperous, accessible, and connected Southern California region. (SCAG 2024, pp.7-8) The four core categories of Connect SoCal 2024 are: mobility, communities, environment, and economy. Connect SoCal 2024 stays committed to the safe and fluid movement of goods through the deployment of zero and near-zero emission technologies. (SCAG 2024, p. 12.) It outlines more than $751.7 billion in transportation system investments over the next 25-year. (SCAG 2024, p. 12.) Connect SoCal *2024* was prepared through a collaborative, continuous, and comprehensive process with input wide range of constituents and stakeholders within the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura, including public agencies, community organizations, elected officials, tribal governments, the business community and the general public. (SCAG 2024, p. 13.) The goals included in Connect SoCal 2024 are meant to provide guidance for considering projects within the context of regional goals.

Connect SoCal 2024 provides an opportunity to identify transportation strategies today that address mobility needs for the future. Connect SoCal 2024 outlines growth strategies for land use and transportation and help reduce the State's greenhouse gas emissions from cars and light duty trucks, a requirement put in place by the passage of Senate Bill 375 with the goal of ensuring that the SCAG region can meet its regional greenhouse gas reduction targets set by CARB. (SCAG 2024, p. 7.) CARBs targets for the SCAG region, which were updated in 2018, are 8 percent below 2005 per capita emissions level by 2020 (this target was unchanged) and 19 percent below 2005 per capita emissions level by 2035 (this was increased from 13 percent below 2005 per capita emissions levels by 2035). (SCAG 2024, p. 225.) The regional targets were updated to ensure consistency with the more stringent statewide reduction goals subsequently introduced by the California legislature. (SCAG 2024, p. 79.) Connect SoCal has been found to meet State targets for reducing GHG emissions from cars and light trucks. Connect SoCal 2020 achieved per capita GHG emission reductions relative to 2005 levels of 8 percent in 2020 and 19 percent in 2035, thereby meeting the GHG reduction targets established by CARB for the SCAG region. (SCAG 2024, p. 186.)

The Project's consistency with *Connect SoCal* is included in **Table 5.5-B – Proposed Project Consistency with *Connect SoCal* Goals**.

Local Regulations

City of Perris Comprehensive General Plan 2030

The City of Perris Comprehensive General Plan 2030 Land Use Element contains the following goal and policy related to land use:

Land Use Element

Goal III	Commerce and industry to provide jobs for residents at all economic levels
Policy III.A	Accommodate diversity in the local economy

PVCCSP Standards and Guidelines and PVCCSP EIR Mitigation Measures

The PVCCSP and the PVCCSP EIR do not include Standards and Guidelines or mitigation measures specifically for potential impacts related to Land Use and Planning.

City of Perris Good Neighbor Guidelines

The City of Perris adopted the Good Neighbor Guidelines for Siting New and/or Modified Industrial Facilities in 2022 that aim to balance economic growth, industrial development, and business success while implementing methods for the reduction of potential negative impacts on sensitive receptors. The Perris Good Neighbor Guidelines goals and policies formalize what is expected from industrial development, particularly those closer to sensitive receptors. However, the applications for the proposed Project were submitted before the Perris Good Neighbor Guidelines were adopted by the City of Perris City Council and, as such, the Perris Good Neighbor Guidelines are not applicable to the Project.

5.5.3 Design Considerations

Design considerations refer to ways in which the proposed Project will avoid or minimize potential impacts through the design of the Project. As mentioned in *Section 5.5.1* above, the Project is located within the PVCC and has a PVCCSP land use designation of General Industrial. The proposed Project Site Plan includes enhanced architectural features such as, but not limited to, screening walls, pedestrian walkways, and light fixtures that creates a cohesive design aesthetic.

5.5.4 Comments Received in Response to the Initial Study/Notice of Preparation

No comment letters were received related to land use in response to the Notice of Preparation. All comment letters received are identified in **Table 2.0 A – Written Comments Received During the Notice of Preparation Comment Period** and included in their entirety in Appendix A of this Draft EIR.

One verbal comment was received during the June 18, 2025, public scoping meeting regarding land use. The verbal comment received is summarized in **Table 2.0-B – Verbal Comments Received During the Draft EIR Scoping Meeting**. The land use comment is addressed in this Section.

5.5.5 Thresholds of Significance

The City of Perris has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G to the *CEQA Guidelines*.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project would have a less than significant impact in the following area and this topic is not addressed in this Draft EIR:

- Physically divide an established community: or

As identified in the Initial Study prepared for this Project, implementation of the proposed Project could have potentially significant impacts in the following area and this topic is addressed in this Draft EIR:

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

5.5.6 Environmental Impacts Before Mitigation

Threshold A: *Would the Project cause a significant environmental impact due to conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

CEQA Guidelines Section 15125(d) requires EIRs to "…discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans." The objective of such a discussion is to find ways to modify a proposed project, if warranted, to reduce any identified inconsistencies with relevant plans and policies. Pursuant to CEQA Guidelines Section 15125(d), this Draft EIR includes an evaluation of the consistency of the proposed Project with applicable goals and policies of adopted local and regional plans that have been adopted for the purpose of avoiding or mitigating an environmental effect. **Table 5.5-A – Consistency with City of Perris General Plan 2030 Policies** considers how the Project is consistent with the City of Perris General Plan 2030 policies applicable to new industrial development.

Table 5.5-A – Consistency with City of Perris General Plan 2030 Policies

City of Perris General Plan 2030 Policy	Consistency Analysis
Circulation Element	
Policy I.B Support development of a variety of transportation options for major employment and activity centers including direct access to commuter facilities, primary arterial highways, bikeways, park-and-ride facilities, and pedestrian facilities.	**Consistent**: Bike racks would be installed at the Project site to encourage employees to bike to work. As part of the Project, pedestrian paths and a multipurpose trail would be installed along Harley Knox Boulevard and Indian Avenue. Additionally, the Project would include new sidewalk and curb along the Project frontage, as needed. The existing Class II Bike lanes along Harley Knox Boulevard would be repainted and remain. The Project applicant would also pay applicable development impact fees (DIF), which may be used by the City to support development of transportation options.
Policy II.B. Maintain the existing transportation network while providing for future expansion and improvement based on travel demand, and the development of alternative travel modes	**Consistent**: The proposed Project would not involve or require any changes to the existing transportation network. Through the installation of bike facilities and implementation of PVCCSP EIR mitigation measures **MM Trans 3** and **MM Trans 8**, which require the collection of fees to be used to construct necessary improvements to maintain the City's circulation system, the Project would support development of alternative travel modes.

Table 5.5-A – Consistency with City of Perris General Plan 2030 Policies

City of Perris General Plan 2030 Policy	Consistency Analysis
Policy III.A Implement a transportation system that accommodates and is integrated with new and existing development and is consistent with financing capabilities.	**Consistent:** As part of the Project, curb and gutter, new sidewalks, and a multipurpose trail per PVCCSP and City standards would be constructed along the Project's frontage in Harley Knox Boulevard and Indian Avenue. The proposed Project is consistent with the land use designation in the City of Perris General Plan 2030 and PVCCSP, and traffic associated with development of the site as a warehouse can be accommodated by the City's planned transportation system. Additionally, the Project applicant will also pay applicable development impact fees (DIF), which may be used by the City to support development of transportation options.
Policy V.A Provide for safe movement of goods along the street and highway system.	**Consistent:** The proposed Project has been designed to ensure that adequate sight distance is provided at each Project access point and that adequate signing and striping is provided. All Project trucks would be restricted to access City/PVCCSP designated truck routes to access I-215 including Harley Knox Boulevard and Indian Avenue adjacent to the Project site. These routes allow for the movement of goods without compromising the circulation or safety of local roads.
Policy VII.A Implement the Transportation System in a manner consistent with Federal, State, and local environmental quality standards and regulations.	**Consistent:** Implementation of the City's Transportation System and consistency of this System with Federal, State, and local environmental quality standards and regulations is the responsibility of the City. The proposed Project is consistent with the land use designation of the proposed Project site in the City of Perris General Plan 2030 and PVCCSP. The Project includes roadway improvements along the Project site frontage on Harley Knox Boulevard and Indian Avenue, as well as sidewalk and bike lane improvements along the Project site frontage. These improvements would be required to be constructed in accordance with City standards.
Policy VIII.A Encourage the use of Transportation Demand Management (TDM)/Transportation Control Measure (TCM) strategies and programs that provide attractive, competitive alternatives to the single-occupant vehicle.	**Consistent:** As required by the PVCCSP**,** the Project would provide bike facilities and vanpool/carpool parking to encourage alternatives to the single-occupant vehicle.

Table 5.5-A – Consistency with City of Perris General Plan 2030 Policies

City of Perris General Plan 2030 Policy	Consistency Analysis
Conservation Element	
Policy II.A Comply with state and federal regulations to ensure protection and preservation of significant biological resources.	**Consistent:** The proposed Project site falls within the boundaries of two Habitat Conservation Plans; the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and the Stephens' kangaroo rat Habitat Conservation Plan. *Section 4.0 - Environmental Effects Found Not to be Significant* of this Draft EIR, identifies mitigation measures **MM BR 1** and **MM BR 2** which require preconstruction surveys for nesting birds, preconstruction surveys for Western burrowing owl, and outlines protocols in the event of burrowing owls occupy the Project site, respectively. Compliance with mitigation measures **MM BR 1** and **MM BR 2** ensure compliance with the Migratory Bird Treaty Act and relevant sections of the California Fish and Game Code.
Policy III.A Review all public and private development and construction projects and any other land use plans or activities within the MSHCP area, in accordance with the conservation criteria procedures and mitigation requirements set forth in the MSHCP.	**Consistent:** Consistency and compliance with the MSHCP is discussed in detail in *Section 4.0 – Environmental Effects Found Not to be Significant,* of this Draft EIR. The Project site is not located in a Criteria Cell and is consistent with the other policies set forth by the MSHCP as outlined under *Section 4.0.*
Policy IV.A Comply with State and Federal regulations and ensure preservation of the significant historical, archaeological, and paleontological resources.	**Consistent:** In compliance with PVCCSP EIR mitigation measure MM Cultural 1, a Phase I Cultural Resources Study was prepared for the proposed Project to address potential impacts to historic, archaeological, and paleontological resources. As stated in *Section 4.0 – Environmental Effects Found Not to be Significant,* of this Draft EIR, there are no known historical, archaeological resources identified within the Project site. However, two potentially historical resources intersect with the offsite improvements, but were determined to not have any historical significance under the criteria established by the California Register of Historical Resources. Nonetheless, potential resources may be discovered during construction activities. Therefore, mitigation measures **MM CR 1**, **MM CR 2,** and **MM GEO 1** identified in Section *4.0* would be implemented. Mitigation measure **MM CR 1** requires archaeological resource monitoring during grading activities and the Project applicant and a local Native American Tribal representative to enter into agreement regarding protocol in the event of discovery of an archaeological resources. Mitigation measure **MM CR 2** outlines protocol in the event that human remains are discovered. Mitigation measure **MM GEO 1** requires the Project applicant to have a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP) in place with a qualified paleontologist who will be present during subsurface excavations.

Table 5.5-A – Consistency with City of Perris General Plan 2030 Policies

City of Perris General Plan 2030 Policy	Consistency Analysis
Policy V.A Coordinate land-planning efforts with local water purveyors.	**Consistent:** Land planning efforts are the responsibility of the City and not the responsibility of the Project applicant. As discussed in *Section 4.0 – Environmental Effects Found Not to be Significant* of this Draft EIR, the water provider for the Project Site is the Eastern Municipal Water District (EMWD). Based on the EMWD Urban Water Management Plan (UWMP), it was determined that the EMWD would be able to meet projected demand for water within its service boundaries unital at least the year 2045. The EMWD determined that it would be able to provide adequate water supply to meet the potable water demand for future development allowed by the PVCCSP as part of its existing and future demands. Therefore, it can be concluded that there are sufficient water supplies available to serve the proposed Project, which is consistent with the land use assumptions of the PVCCSP for industrial uses, from the EMWD's existing entitlements and resources as set forth in its 2020 Urban Water Management Plan and the Metropolitan Water District's 2020 Urban Water Management Plan. Therefore, because the proposed Project is consistent with the land use designation for the site that was assumed in the most recent Urban Water Management Plan, the EMWD would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years.
Policy VI.A Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).	**Consistent:** As discussed in *Section 4.0 – Environmental Effects Found Not to be Significant* of this Draft EIR, the Project developer would be required to prepare a Storm Water Pollution Prevention Plan pursuant to the statewide General Construction Permit issued by the State Water Resources Control Board for construction projects that would reduce any potential construction-related water quality impacts to a less than significant level.
Policy VII.A Preserve significant hillsides and rock outcroppings in the planning areas.	**Consistent:** The proposed Project site is void of any hillsides or rock outcroppings.

Table 5.5-A – Consistency with City of Perris General Plan 2030 Policies

City of Perris General Plan 2030 Policy	Consistency Analysis
Policy X.B Encourage the use of trees within project design to lessen energy needs, reduce the urban heat island effect, and improve air quality throughout the region.	**Consistent:** As discussed in *Section 3.0 – Project Description* of this Draft EIR**,** the Project includes approximately 17% landscaping (**Figure 3.0-9, Site Plan)** which would exceed City minimum landscape requirements (10%) and provide adequate landscape shade for the site to reduce energy use. Further, the Project's conceptual landscape plan (**Figure 3.0-12, Conceptual Landscape Plan**) incorporates a plant palette consisting of drought-tolerant and climate appropriate trees, shrubs, and ground cover that include native species as set forth in the Perris General Plan. The Project would include approximately 315 trees strategically placed within the parking lot, around the building, along Harley Knox Boulevard and Indian Avenue, and at the Project entry, which would reduce the effects from urban heat islands, reduce energy needs, and improve air quality. Additionally, the proposed Project would meet or exceed all applicable standards under CALGreen and the Building Energy Efficiency Standards contained in Title 24. The Project includes design concepts and materials that would meet the requirements of LEED Silver Certification.
Policy X.C Encourage strategic shape and placement of new structures within new commercial and industrial projects.	**Consistent:** The proposed Site Plan (**Figure 3.0-9**) has been designed to strategically place the building within the shape of the Project site. Loading docks would be located along the north of the proposed building adjacent to the Perris Valley Storm Drain and would not be visible from Harley Knox Boulevard.
Environmental Justice Element	
Goal 3.1 Policy: • Continue to ensure new development is compatible with the surrounding uses by co-locating compatible uses and using physical barriers, geographic features, roadways or other infrastructure to separate less compatible uses. When this is not possible, impacts may be mitigated using: noise barriers, building insulation, sound buffers, traffic diversion. • Support identification, clean-up and remediation of local toxic sites through the development review process.	**Consistent:** As previously discussed in *Section 3.0 – Project Description* of this Draft EIR, the proposed Project is consistent with the land use designation of the site and surrounding uses. *Section 5.6 – Noise* of this Draft EIR evaluates the noise impacts from Project implementation to surrounding uses and concludes that with implementation of applicable PVCCSP EIR mitigation measure **MM Noise 1** and Project-specific mitigation measures **MM NOI 1** and **MM NOI 2**, potential impacts would be less than significant. Additionally, as discussed in *Section 4.0 - Environmental Effects Found Not to be Significant* of this Draft EIR, the Project site is not in or adjacent to a toxic site.

Table 5.5-A – Consistency with City of Perris General Plan 2030 Policies

City of Perris General Plan 2030 Policy	Consistency Analysis
Goal 3.1 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, day-care centers, schools, and nursing homes from air pollution, noise lighting, and traffic associated with large warehouses, making them a "good neighbor."	**Consistent:** The Project site is within the PVCC area, surrounded by existing industrial uses, and there are no sensitive receptors within 1,500 feet of the Project site. As described throughout this Draft EIR and the Initial Study, the air quality, noise, transportation, and lighting impacts associated with the construction and operation of the Project would be less than significant or less than significant with the implementation of PVCCSP EIR and Project -specific mitigation measures, which are listed in *Section 1.0 – Executive Summary*.
Goal 3.2 Policy: • Participate in air quality planning efforts with local, regional, and State agencies that improve local air quality to protect human health, minimize the disproportionate impacts on sensitive population groups, and ensure that City concerns are resolved early in the process. • Inform existing industries of the state 5-minute maximum idling limitation and condition new industrial projects to enforce the state's 5-minute maximum idling limitation for stationary diesel trucks.	**Consistent:** As mentioned in *Section 3.0 - Project Description* of this Draft EIR, the Project owner would inform building operators of existing requirements to turn off equipment, including heavy-duty equipment, motor vehicles, and portable equipment, when not in use for more than 5 minutes. Signage would be posted throughout the Project site, requiring that trucks shall not be left idling for more than 5 minutes. *Section 5.2 - Air Quality*, of this Draft EIR evaluates the Project's impacts, including idling impacts, to air quality in the region and in the Project vicinity. Implementation of applicable PVCCSP EIR mitigation measures would ensure that all potential air quality impacts of the Project, including those to sensitive receptors, would be less than significant.
Goal 5.1 Policy: • Require developers to provide pedestrian and bike friendly infrastructure in alignment with the vision set in the City's Active Transportation plan or active transportation in-lieu fee to fund active mobility projects.	**Consistent:** Roadway improvements included as part of the Project would be constructed according to the standards of the City of Perris and include sidewalks, multi-purpose trails and/or bike lanes. The PVCCSP also includes pedestrian paths and sidewalks into roadway design, and bike trails into its Standards and Design Guidelines to accommodate non-motorized forms of transportation along roadways within the Specific Plan. The Project includes a 12-foot-wide parkway multipurpose lane consisting of a 4-foot-wide pedestrian path and an 8-foot-wide plain cement concrete bicycle path on Harley Knox Boulevard and Indian Avenue as described in *Section 3.0 – Project Description*. Bike racks would be installed at the Project site to encourage employees to bike to work. The Project applicant would also pay the applicable DIF, which may be used by the City to support development of active transportation options.

Table 5.5-A – Consistency with City of Perris General Plan 2030 Policies

City of Perris General Plan 2030 Policy	Consistency Analysis
Healthy Community Element	
HC 1.3 Improve safety and the perception of safety by requiring adequate lighting, street visibility, and defensible space	**Consistent:** As discussed in *Section 3.0- Project Description*, the proposed Project would include new permanent sources of light. Project lighting will include security lights along the buildings and screen walls and pole-mounted lights in the parking areas. The existing streetlights would be relocated within the Harley Knox Boulevard and Indian Avenue right-of-way. All Project-proposed lighting would abide by the lighting requirements outlined in the Perris Municipal Code and PVCCSP. Additionally, the proposed Project would include all required emergency access points and would be reviewed by the Perris Fire Department to ensure all regulations of the California Fire Code are met.
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 (South Coast AQMD) 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 South Coast AQMD, Best Available Control Measures will be incorporated to reduce construction emissions to below daily emission standards established by the South Coast AQMD • Project proponents will be required to prepare and implement a Construction Management Plan which will include Best Available Control Measures among others. Appropriate control measures will be determined on a project by project basis, and should be specific to the pollutant for which the daily threshold is exceeded	**Consistent:** As discussed in *Section 5.2- Air Quality*, the proposed Project would implement all applicable PVCCSP EIR mitigation measures for construction-related emissions and comply with the existing South Coast AQMD rules and regulations aimed at reducing construction-related emissions of pollutants. The Project would not exceed any South Coast AQMD daily emissions thresholds of significance.

Table 5.5-A – Consistency with City of Perris General Plan 2030 Policies

City of Perris General Plan 2030 Policy	Consistency Analysis
Land Use Element	
Policy II.A Require new development to pay its full, fair share of infrastructure costs.	**Consistent:** The PVCCSP includes an Infrastructure Plan that identifies the utility infrastructure necessary to serve the allowed development in the PVCCSP area. Each individual development, including the proposed Project, is required to implement the infrastructure needed to serve its proposed uses. Water, wastewater, drainage, and dry utility lines that would be installed as part of the proposed Project are described in *Section 3.0 – Project Description*. The Project applicant would also pay applicable DIF to pay fair share of infrastructure costs.
Policy II.B Require new development to include school facilities or pay school impact fees, where appropriate.	**Consistent:** As discussed in *Section 4.0 - Environmental Effects Found Not Significant* of this Draft EIR, although the proposed Project would not directly increase population affecting school facilities, the proposed Project would still be required to pay appropriate school impact fees.
Policy III.A Accommodate diversity in the local economy	**Consistent**: The proposed Project is consistent with the PVCCSP land use designation of General Industrial for the site, which was adopted by the City to ensure quality, organized development within the Project site vicinity. As previously discussed in *Section 4.0 - Environmental Effects Not Found Significant* of this Draft EIR, the proposed Project would generate short-term jobs during its construction, and long-term jobs during its operation. However, it is anticipated that these construction and operational positions would be filled by workers who already reside in the Project's vicinity.
Policy V.A. Restrict development in areas at risk of damage due to disasters.	**Consistent**: As discussed in *Section 4.0 - Environmental Effects Found Not Significant* of this Draft EIR, the Project site is located in "Zone X" or, "Areas determined to be outside the 0.2% annual chance floodplain" and "Zone D" or, "Areas of undetermined flood hazard". Thus, the proposed Project site is not located within a Flood Zone. As identified in *Section 4.0 - Environmental Effects Found Not Significant* of this Draft EIR, the Project site is not within an Alquist-Priolo Earthquake Fault Zone. Further, compliance with requirements of the PVCCSP EIR and recommendations from the Project-specific geotechnical report would ensure that potential impacts related to geology and soils would be less than significant.
Noise Element	
Policy I.A The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development.	**Consistent:** The State of California Noise/Land Use Compatibility Criteria was utilized in analyzing potential noise impacts to the proposed building, as discussed in the *Section 5.6 – Noise*.

Table 5.5-A – Consistency with City of Perris General Plan 2030 Policies

City of Perris General Plan 2030 Policy	Consistency Analysis
Policy II.A Appropriate measures shall be taken in the design phase of future roadway widening projects to minimize impacts on existing noise-sensitive receptors.	**Consistent:** Based on the Noise Study (Appendix F) discussed in *Section 5.6 - Noise* of this Draft EIR, there are no sensitive receptors located near the Project Site; the nearest sensitive receptor is approximately 1,600 feet away from the Project site. Industrial uses, vacant land and drainage facilities surround the Project site. Four industrial offsite receptors were identified along Indian Avenue and along Harley Knox Boulevard. Although the proposed Project does not include or require any roadway widening, these two roadways would undergo roadway improvements as part of this Project. Project roadway improvements would consist of a sidewalk, curb and gutter, and restriping to include two southbound lanes on Indian Avenue. These improvements are consistent with the City's existing roadway designations. As indicated in *Section 5.6*, the Project would have to implement PVCCSP EIR mitigation measure **MM Noise 1** during Project construction. Compliance with PVCCSP EIR mitigation measure **MM Noise 1** would minimize impacts to existing noise-sensitive receptors during project Construction. As discussed in *Section 5.6.6* under the subheading *Project-Generated Traffic Noise Impacts*, Project-generated traffic would result in an approximately 0.1 dBA increase along Harley Knox Boulevard and 0.2 dBA increase along Indian Avenue. These increases are substantially less than 1 dBA and as such would not be perceptible.
Policy V.A New large scale commercial or industrial facilities located within 160 feet of sensitive land uses shall mitigate noise impacts to attain an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria.	**Consistent:** There are no sensitive receptors near the Project site. The nearest sensitive receptor to the Project site is a legal, non-conforming residential site that seems to be vacant, approximately 1,600 feet southwest from the Project site, along Webster Avenue. As further discussed in *Section 5.6 - Noise* of this Draft EIR, the Noise Study (Appendix F) concluded that operational noise levels associated with the Project would satisfy the Perris Municipal Code exterior noise level standards of 80 dBA L_{max} daytime and 60 dBA L_{max} nighttime and the City of Perris General Plan Noise Element 2030 Standard of 60 dBA CNEL.

Table 5.5-A – Consistency with City of Perris General Plan 2030 Policies

City of Perris General Plan 2030 Policy	Consistency Analysis
Safety Element	
Policy S-2.1 Require road upgrades as part of new developments/major remodels to ensure adequate evacuation and emergency vehicle access. Limit improvements for existing building sites to property frontages.	**Consistent:** As identified *in Section 3.0- Project Description*, the proposed Project includes improvements along existing alignments of Harley Knox Boulevard and Indian Avenue, that are necessary to serve the proposed site. As further discussed in *Section 4.0 – Environmental Effects Found Not Significant* of this Draft EIR, emergency access will be maintained and provided in accordance with the County's Multi-Hazard Functional Plan. All roadway improvements and access would be constructed in accordance with City standards. This would ensure adequate evacuation and emergency vehicle access. Additionally, the PVCCSP Initial Study determined that because emergency access would be maintained and improved throughout the PVCC area in accordance with the Local Hazard Mitigation Plan, development within the PVCC area would not interfere with adopted emergency response plans.
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 identified in *Section 3.0 - Project Description*, the proposed Project includes improvements along existing alignments of Harley Knox Boulevard and Indian Avenue, that are necessary to serve the Project site. The Project would also construct drainage infrastructure consistent with the PVCCSP and Perris Valley Master Drainage Plan. All roadway and drainage improvements would be constructed in accordance with applicable local standards.
Policy S-2.3 Primary access routes shall be completed prior to the first certificate of occupancy in developments located in outlying areas of the City.	**Consistent:** The Project Site is located within the urbanized area of the City and would have direct access to Harley Knox Boulevard and Indian Avenue.
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 discussed in *Section 3.0 - Project Description* of this Draft EIR, the Project includes three driveways: one along Harley Knox Boulevard (for emergency access and automobiles) and two along Indian Avenue. The southerly driveway on Indian Avenue would be for emergency access and automobiles. The northerly driveway on Indian Avenue would be truck access only. All roadway improvements and access would be constructed in accordance with City standards. This would ensure adequate site access.
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:** As discussed in *Section 4.0 – Environmental Effects Found Not Significant* of this Draft EIR , the Project site is located in an area identified as Zone X which is determined to be outside of the 0.2% annual change floodplain and Zone D which is undetermined flood hazard areas.

Table 5.5-A – Consistency with City of Perris General Plan 2030 Policies

City of Perris General Plan 2030 Policy	Consistency Analysis
Policy S-4.3 Require new development projects and major remodels to control stormwater run-off on site.	**Consistent:** As discussed in *Section 6.19 - Utilities and Service Systems* of the Initial Study and *Section 3.3.2 - Infrastructure Improvements of this Draft EIR*, the Project includes construction of onsite curb and gutter and subsurface storm drains that would direct all onsite stormwater and nuisance runoff in subsurface storm drains to underground detention chambers located within the Project site. Following water quality treatment, stormwater would discharge to the existing PVSD Channel, Lateral B, located adjacent to the northerly Project boundary line.
Policy S-4.4 Require flood mitigation plans for all proposed projects in the 100-year floodplain (Flood Zone A and Flood Zone AE).	**Consistent:** As discussed in *Section 4.0 – Environmental Effects Found Not Significant* of this Draft EIR, the Project site is located in an area identified as Zone X which is determined to be outside of the 0.2% annual change floodplain and Zone D which is undetermined flood hazard areas. Therefore, a flood mitigation plan is not required for the proposed Project.
Policy S-4.5 Ensure areas downstream of dams within the City are aware of the hazard potential and educated on the necessary steps to prepare and respond to these risks.	**Consistent:** As discussed *in Section 4.0 – Environmental Effects Found Not Significant* of this Draft EIR, the only portion of the Project site within the Perris Dam Inundation Zone is a portion of the offsite along Indian Avenue and Harley Knox Boulevard.
Policy S-5.3 Promote new development and redevelopment in areas of the City outside the VHFHSZ and allow for the transfer of development rights into lower-risk areas, if feasible.	**Consistent:** As discussed in *Section 4.0 - Environmental Effects Found Not Significant* of this Draft EIR, the Project site is not located in or near an area identified as being a "Very High Fire Hazard Severity Zone".
Policy S-5.6 All developments throughout the City Zones are required to provide adequate circulation capacity, including connections to at least two roadways for evacuation.	**Consistent:** As discussed in *Section 3.0 - Project Description* of this Draft EIR, the Project includes three driveways: one along Harley Knox Boulevard (for emergency access and automobiles) and two along Indian Avenue. The southerly driveway on Indian Avenue would be for emergency access and automobiles. The northerly driveway on Indian Avenue would be truck access only. All roadway improvements and access would be constructed in accordance with City standards. This would ensure adequate site circulation capacity and access.
Policy S-5.10 Ensure that existing and new developments have adequate water supplies and conveyance capacity to meet daily demands and firefighting requirements.	**Consistent:** As discussed in *Section 4.0 – Environmental Effects Found Not Significant* of this Draft EIR, a review of the EMWD Urban Water Management Plan was conducted to assess if existing water supplies would be sufficient to meet Project demands. Based on the UWMP projections, there is sufficient water supplies in normal and drought conditions for the foreseeable future to serve existing developments and the proposed Project. No new offsite potable or recycled water lines are needed to serve the Project.

Table 5.5-A – Consistency with City of Perris General Plan 2030 Policies

City of Perris General Plan 2030 Policy	Consistency Analysis
Policy S-6.1 Ensure new development and redevelopments comply with the development requirements of the AlCUZ Land Use Compatibility Guidelines and ALUP Airport Influence Area for March Air Reserve Base.	**Consistent:** As mentioned above in *Section 5.5.2*, the Project site is located within March ARB/IPA Airport Influence Zones A, B1-APZ I, B2, and C1; therefore, the Project would be required to comply with the following measures: • Avigation Easement • Noise Standard • Land Use and Activities • Retention and Water Quality Basins • Notice of Airport in the Vicinity • Disclosure • Lighting Plans • Height Restrictions per Federal Aviation Regulations Part 77 • Clear Zone • Approach/Departure Clearance Surface • Inner Horizontal Surface • Conical Surface
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.	**Consistent:** As discussed *in Section 4.0 – Environmental Effects Found Not Significant* of this Draft EIR, the Project site is located approximately 0.3 mile southeast of March ARB/IPA, and just over 5 miles northwest from Perris Valley Airport. The Project is not required to go through ALUC review and consistency determination because 1) the City created an Airport Overlay Zone component to the City's land use planning to accommodate development within the City consistent with the land use designations of the March ARB/IPA ALUCP, and 2) there is no legislative action (i.e., general plan amendment, specific plan amendment, or change of zone) required or proposed.
Policy S-6.3 Effectively coordinate with March Air Reserve Base and Perris Valley Airport on development within its influence areas.	**Consistent:** As mentioned above in Policy S-6.2, the Project site is located within area subject to the March ARB/IPA ALUCP and does not require ALUC review.
Policy S-7.1 Require all development to provide adequate protection from damage associated with seismic incidents.	**Consistent:** As discussed in *Section 4.0 – Environmental Effects Found Not Significant* of this Draft EIR, the Project site is not located within an Alquist-Priolo Earthquake Fault zone. Additionally, the Geotechnical Investigation prepared for the Project did not find any evidence of faulting. Further, the Project would be designed to meet or exceed the seismic standards in the current California Building Code to reduce seismic impacts.

Table 5.5-A – Consistency with City of Perris General Plan 2030 Policies

City of Perris General Plan 2030 Policy	Consistency Analysis
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:** As discussed in *Section 4.0 – Environmental Effects Found Not Significant* of this Draft EIR, a Geotechnical Investigation was prepared by Southern California Geotechnical (State-licensed professionals) and is included in Appendix A of this Draft EIR. Additionally, the Project would be designed and constructed in accordance with all Geotechnical Investigation recommendations.
Policy S-7.4 Ensure slope stability issues are effectively addressed in both developed and developing areas within the City.	**Consistent:** As discussed in *Section 4.0 – Environmental Effects Found Not Significant* of this Draft EIR, the Project site is generally flat and is not located in an area prone to slope instability. Additionally, a Geotechnical Investigation was prepared by Southern California Geotechnical (State-licensed professionals) and is included in Appendix A of this Draft EIR. The Project would be designed and constructed in accordance with all Geotechnical Investigation recommendations.
Policy S-8.2 Ensure that the transport, use, storage, and disposal of hazardous materials occur in a responsible manner that protects public health and safety.	**Consistent:** As discussed in *Section 4.0 – Environmental Effects Found Not Significant* of this Draft EIR, several Federal and State agencies prescribe strict regulations for the safe transportation of hazardous materials. Construction and operation of the proposed Project would be in compliance with all applicable laws and regulations thus protecting public health and safety.

As identified through the consistency analysis in **Table 5.5-A**, the proposed Project would not conflict with any applicable City of Perris General Plan policy adopted for the purpose of avoiding or mitigating an environmental effect.

Consistency with Connect SoCal 2024

As previously mentioned in *Section 5.5.2*, SCAG is the Metropolitan Planning Organization for Ventura, Los Angeles, Orange, Riverside, San Bernardino, and Imperial counties and is charged by the federal government to research and prepare plans for transportation, growth management, hazardous waste management, and air quality. SCAG is also the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan including its Sustainable Communities Strategy component pursuant to SB 375.

Table 5.5-B – Proposed Project Consistency with Connect SoCal 2024 Goals, presents a side-by-side comparison of the Connect SoCal 2024 Goals and a discussion regarding the Project's consistency, non-consistency, or non-applicability with each goal.

Table 5.5-B – Proposed Project Consistency with Connect SoCal 2024 Goals

Connect SoCal 2024 Goal	Consistency Analysis
Goal 1: Mobility. **Build and maintain an integrated multimodal transportation network.** <u>Subgoals:</u> ▪ Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions ▪ Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities ▪ Support planning for people of all ages, abilities and background	***Consistent:*** The Project applicant proposes to develop and operate a logistics center on an underutilized site that leverages the existing City infrastructure and is adjacent to similar industrial logistics and distribution center uses. The proposed development would include an approximately 549,786-square-foot non-refrigerated warehouse that would accommodate high-cube warehouse distribution uses, anticipating that approximately 10,000 square feet could be utilized for supporting office and mezzanine uses. The Project incorporates design features that support a multimodal transportation network. As outlined in *Section 3.0 - Project Description*, the Project will include bike racks to encourage employees to commute by bicycle. In addition, the Project would also include multipurpose lanes with a separate dedicated pedestrian and bike paths along Harley Knox Boulevard and Indian Avenue that would enhance connectivity within the existing nearby infrastructure. The Project ensures site accessibility for all individuals of all abilities by providing designated accessible parking spaces near the office areas. As described in *Section 5.2 – Air Quality*, *Section 5.3 - Energy*, and *Section 5.4 – Greenhouse Gas*, potential impacts to air quality, energy, and greenhouse gas would be less than significant and no Project specific mitigation is required.
Goal 2: Communities. **Develop, connect and sustain livable and thriving communities.** <u>Subgoals:</u> • Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances. • Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.	***Not Applicable.*** The Project site is located within the PVCC area of the City of Perris. The PVCCSP Land Use Plan envisions this area to be a concentrated commerce center with a balanced mix of industrial uses including Business Professional Office (BPO), Light Industrial (LI), and General Industrial (GI). Thus, residential development is not permitted in this area.

Table 5.5-B – Proposed Project Consistency with Connect SoCal 2024 Goals

Connect SoCal 2024 Goal	Consistency Analysis
Goal 3: Environment. **Create a healthy region for the people of today and tomorrow.** Subgoals: • Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change. • Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water. • Conserve the region's resources.	***Consistent*:** The impact on the environment as a result of Project implementation has been analyzed in this Draft EIR pursuant to CEQA. As described in *Section 5.2 – Air Quality*, *Section 5.3 - Energy*, and *Section 5.4 – Greenhouse Gas*, potential impacts to air quality, energy, and greenhouse gas would be less than significant and there was no Project specific mitigation required. As described in *Section 3.4 - Sustainability Features*, the Project includes, but is not limited to, the following features: • Provide adequate bicycle parking and bike facilities along with bikeway improvements • Building would be constructed to meet LEED Certified status • Include clean air/vanpool parking • Limit idling time for commercial vehicles to no more than five minutes • Install light-colored roofing materials over office area spaces and light-colored paving materials • Design buildings to be water-efficient. Install water-efficient fixtures in accordance with Section 5.303 of the California Green Building Standards Code Part 11 • For future office improvement, refrigerants and HVAC equipment will be selected to minimize or eliminate the emission of compounds that contribute to ozone depletion and global climate change

Table 5.5-B – Proposed Project Consistency with Connect SoCal 2024 Goals

Connect SoCal 2024 Goal	Consistency Analysis
Goal 4: Economy. **Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.** Subgoals: • Improve access to jobs and educational resources. • Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.	***Consistent*:** The Project would support the City's economic growth through capital investment, job creation, and expansion of the local tax base that would further the City's near tern and long-rage fiscal goals. As discussed in *Section 6.14 - Population and Housing* of the Initial Study, the Project will create 542 new jobs in the City plus temporary construction jobs which will improve the City's jobs-housing balance. Additionally, Connect SoCal indicates that since the adoption of the 2016 Regional Transportation Plan/Sustainable Communities Strategy, there have been significant drivers of change in the goods movement industry including emerging and new technologies, more complex supply chain strategies, evolving consumer demands and shifts in trade policies. As previously identified, in *Section 3.3.1 – Proposed Project*, the Project involves the development of a high-cube warehouse building that has been designed to meet contemporary industry standards and operational characteristics. The Project would accommodate users and would be economically competitive with similar industrial buildings in the local area and region. Further, the Project is located in an area designated for industrial development in the City of Perris, which benefits from its proximity to a key transportation network (e.g., I-215, SR-60).

As identified through the consistency analysis in **Table 5.5-B**, the proposed Project would not conflict with any applicable Connect SoCal 2024 goal adopted for the purpose of avoiding or mitigating an environmental effect.

5.5.7 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines Section 15126.4). Less than significant environmental impacts to land use and planning are anticipated to result from implementation of the Project and thus no mitigation measures are required.

5.5.8 Summary of Environmental Effects After Mitigation Measures Are Implemented

The proposed Project does not result in any significant impact to land use and planning and no mitigation is required.

5.6 Noise

The focus of the following analysis is related to whether the proposed Project would generate 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; generate excessive ground-borne vibration or ground-borne noise levels; or 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. Cumulative impacts are discussed in *Section 7.0 – Cumulative Impact Analysis* of this Draft EIR.

The analysis in this section is based on the *First Industrial Logistics at Harley Knox and Indian, Noise Impact Study, City of Perris* ("Noise Impact Study") prepared for the proposed Project by Entech Consulting Group, October 2025. The Noise Impact Study is included in Appendix F to this Draft EIR.

The following references were used in the preparation of this section of the Draft EIR:

- Airforce Reserve Command, *Final Air Installations Compatible Use Zones Study*, March Air Reserve Base, Riverside California, 2018. Available at www.marchjpa.com/documents/docs_forms/AICUZ_2018.pdf, accessed on August 19-2025) [Cited as 2018 AICUZ]
- California Department of Transportation, Division of Environmental Analysis, *Transportation and Construction Vibration Manual*, April 2020. (Available at https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf, accessed July 14, 2025) [Cited as CALTRANS]
- California Governor's Office of Planning and Research, *General Plan Guidelines*, 2017. Available at http://opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf, accessed June 30, 2025. [Cited as OPR 2017]
- City of Perris, *Perris Comprehensive General Plan 2030, Noise Element*. Adopted August 30, 2005, last amended August 30, 2016. Available at https://www.cityofperris.org/home/showpublisheddocument/461/637203139725000000, accessed June 30, 2025. [Cited as Perris GP 2030 Noise Element]
- City of Perris, *Perris Comprehensive General Plan 2030 Environmental Impact Report, State Clearinghouse #2004031135*, October 2004. Available at https://www.cityofperris.org/home/showpublisheddocument/451/637203139698630000, accessed June 30, 2025. [Cited as Perris GP 2030 EIR]
- City of Perris, *Perris Municipal Code*, version July 3, 2025. Available at https://library.municode.com/ca/perris/codes/code_of_ordinances?nodeId=PEMUCOPECA, accessed August 19, 2025. [Cited as Municipal Code]
- City of Perris, *Perris Valley Commerce Center Specific Plan Environmental Impact Report, State Clearinghouse # 2009081086 November 2011*, certified January 10, 2012. Available at https://www.cityofperris.org/departments/development-services/specific-plans, accessed July 14, 2025. [Cited as PVCCSP EIR]

- City of Perris, *Perris Valley Commerce Center Specific Plan Amendment No. 14*, approved October 10, 2023 (Ordinance 1435). Available at City Planning Department.) [Cited as PVCCSP]
- Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018. Available at https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, accessed on June 30, 2025. [Cited as FTA 2018]
- Mead & Hunt, *March Air Reserve Base / Inland Port Airport Land Use Compatibility Plan*, November 13, 2014. Available at https://rcaluc.org/sites/g/files/aldnop421/files/2023-06/March.pdf, accessed July 10, 2024. [Cited as ALUCP-A]
- Mead & Hunt, *Riverside County Airport land use Plan, Volume 1 Policy Document*, October 14, 2004. Available at, https://rcaluc.org/sites/g/files/aldnop421/files/migrated/Portals-13-PDFGeneral-plan-newplan-01--20Cover-20--20Title-20Page-20Vol-201.pdf, accessed July 10, 2024. [Cited as ALUCP-B]
- Occupational Safety and Health Administration, *Occupational Noise Exposure*. Available at https://www.osha.gov/SLTC/noisehearingconservation/, accessed July 14, 2025. [Cited as OSHA]
- United States Environmental Protection Agency, *Summary of the Noise Control Act 42 U.S. C. §4901 et seq. (1972)* Updated September 12, 2022. Available at https://www.epa.gov/laws-regulations/summary-noise-control-act, accessed June 25, 2025. [Cited as EPA-A]
- United States Environmental Protection Agency, *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*, 1974. Available at https://nepis.epa.gov/Exe/ZyNET.exe/2000L3LN.txt?ZyActionD=ZyDocument&Client=EPA&Index=Prior%20to%201976&Docs=&Query=%2855%29%20OR%20FNAME%3D%222000L3LN.txt%22%20AND%20FNAME%3D%222000L3LN.txt%22&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&UseQField=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5CZYFILES%5CINDEX%20DATA%5C70THRU75%5CTXT%5C00000001%5C2000L3LN.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r85g16/r85g16/x150y150g16/i500&Display=hpfr&DefSeekPage=&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=2&SeekPage=f, accessed June 25, 2025. [Cited as EPA-B]
- United States Environmental Protection Agency, *Clean Air Act Title IV - Noise Pollution,* April 18, 2025. Available a https://www.epa.gov/clean-air-act-overview/clean-air-act-title-iv-noise-pollution, accessed June 30, 2025. [Cited as EPA-C]
- Entech Consulting Group, *First Industrial Logistics at Harley Knox and Indian, Noise and Impact Study*, October 2025. (Included as Appendix F in this Draft EIR) [Cited as ENTECH]

5.6.1 Setting

This section presents a discussion of noise fundamentals applicable to the Project, together with an assessment of existing ambient noise levels and noise sources in the Project vicinity.

Fundamentals of Sound

Sound is a disturbance created by a moving or vibrating source and is capable of being detected by the hearing organs. Sound may be thought of as mechanical energy of a moving object transmitted by pressure waves through a medium to a human ear. For traffic, or stationary noise, the medium of concern is air. Noise is defined as sound that is loud, unpleasant, unexpected, or unwanted. (ENTECH, p. 11.) To the human ear, sound has two significant characteristics: amplitude and frequency (or pitch).

A continuous sound is described by its frequency (pitch) and its amplitude (loudness). Frequency relates to the number of pressure oscillations per second. Low-frequency sounds are low in pitch (bass sounding) and high-frequency sounds are high in pitch (squeak). These oscillations per second (cycles) are commonly referred to as Hertz (Hz). The human ear can hear from the bass pitch starting out at 20 Hz all the way to the high pitch of 20,000 Hz. (ENTECH, p 11.)

The amplitude of a sound determines it loudness. The loudness of sound increases or decreases as the amplitude increases or decreases. Sound pressure amplitude is measure in units of micro-Newton per square inch meter, also called micro-Pascal. One micro-Pascal is approximately one hundred billionths (0.00000000001) of normal atmospheric pressure. Sound pressure level is used to describe in logarithmic units the ratio of actual sound pressures to a reference pressure squared. These units are called decibels abbreviated dB. (ENTECH, p 11.) Decibels are on a logarithmic scale, sound pressure levels cannot be added or subtracted by simple plus or minus addition. When two sounds or equal SPL are combined, they will produce a sound pressure level 3 dB greater than the original single sound pressure level. In other words, sound energy must be doubled to produce a 3 dB increase. If two sounds differ by approximately 10 dB, the higher sound level is the predominant sound. The relationship of various noise levels to common noise events is provided in **Table 5.6-A – Typical Noise Levels of Common Sounds**.

Table 5.6-A – Typical Noise Levels of Common Sounds

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock Band (Noise To Some, Music To Others)
Jet Fly-Over At 1,000 Feet	105	
	100	Inside Subway Train
Gas Lawnmower at 3 Feet	95	
	90	
Diesel Truck, 50 Mph at 50 Feet	85	Food Blender at 3 Feet
	80	Garbage Disposal at 3 Feet
Noisy Urban Area During Daytime	75	
Gas Lawnmower at 100 Feet	70	Vacuum Cleaner at 10 Feet
Commercial Area	65	Normal Speech at 3 Feet
Heavy Traffic at 300 Feet	60	
	55	Large Business Office
Quiet Urban Area During Daytime	50	Dishwasher in Next Room
	45	
Quiet Urban Area During Nighttime	40	Theater, Large Conference Room (Background)
Quiet Suburban Area During Nighttime	35	
	30	Library
Quiet Rural Area During Nighttime	25	Bedroom at Night, Concert Hall (Background)
	20	
	15	Recording Studio
	10	
	5	Lowest Threshold of Human Hearing
	0	

Source: ENTECH, Exhibit F.

Two of the primary factors that reduce levels of environmental sounds are increasing the distance between the sound source to the receptor and having intervening obstacles such as walls, buildings, or terrain features between the sound source and the receptor. Factors that act to increase the loudness of environmental sounds include moving the sound source closer to the receptor, sound enhancements caused by reflections, and focusing caused by various meteorological conditions.

The analysis of any project's noise impact defines the noise environment of the project area in terms of sound intensity and its effect on adjacent land uses and receptors.

Effects of Noise on People

The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and in extreme circumstances, hearing impairment. Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with

activities. Typically the human ear cannot perceive a change in noise level of 1 dBA and can barely perceive the change in noise level of 3 dBA. A change in 5 dBA is readily perceptible, and a change in 10 dBA is perceived as being twice or half as loud. As previously discussed, a doubling of sound energy results in a 3 dBA increase in sound, which means that a doubling of sound energy (e.g., doubling the volume of traffic on a highway) would result in a barely perceptible change in sound level. (ENTECH, p. 12.)

Noise Descriptors

Noise in our daily environment fluctuates over time. Some noise levels occur in regular patterns, others are random. Some noise levels are constant while others are sporadic. Noise descriptors were created to describe the different time-varying noise levels. Noise descriptors were created to describe the different time-varying noise levels. **Table 5.6-B – Common Noise Descriptors** lists common noise descriptors.

Table 5.6-B – Common Noise Descriptors

Descriptor	Definition
L_{eq}	The L_{eq}, or equivalent sound level, is used to describe The sound level corresponding to a steady noise level over a given sample period with the same amount of acoustic energy as the actual time varying noise level. The energy average noise level during the sample period.
L_{max}	The maximum instantaneous noise level experienced during a given period of time.
L_{min}	The minimum instantaneous noise level experienced during a given period of time.
L_n	The A-weighted sound level exceeded during a certain percentage of the sample time. For example, L10 in the sound level exceeded 10 percent of the sample time. Similarly, L50, L90 and L99, etc.
SENEL	The dBA level which, if it lasted for one second, would produce the same A-weighted sound energy as the actual event.
CNEL	CNEL, or Community Noise Equivalent Level, is the average equivalent A-weighted sound level during a 24-hour day, obtained after addition of five (5) decibels to sound levels in the evening from 7:00 to 10:00 PM and after addition of ten (10) decibels to sound levels in the night before 7:00 AM and after 10:00 PM.

Source: ENTECH, pp. 12-13.

Fundamentals of Vibration

Ground-borne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. The effects of ground-borne vibrations typically only cause a nuisance to people, but at extreme vibration levels, damage to buildings may occur. Although ground-borne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects of the shaking of a building can be notable. Ground-borne noise is an effect of ground-borne vibration and only exists indoors, since it is produced from noise radiated from the motion of the walls and floors of a room and may also consist of the rattling of windows or dishes on shelves. (ENTECH, p. 15.)

Typically, developed areas are continuously affected by vibration velocities of 50 vibration decibel levels (VdB) or lower. These continuous vibrations are not noticeable to humans whose threshold of perception is around 65 VdB. Outdoor sources that may produce perceptible vibrations are usually caused by construction equipment, steel-wheeled trains, and traffic on rough roads, while smooth roads rarely

produce perceptible groundborne noise or vibration. To counter the effects of ground-borne vibration, the Federal Transit Administration (FTA) has published guidance relative to vibration impacts. According to the FTA, fragile buildings can be exposed to ground-borne vibration levels of 0.3 inches per second without experiencing structural damage. (ENTECH, p. 15.)

Vibration can be quantified by several different methods. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings. The root mean square amplitude is most frequently used to describe the effect of vibration on the human body. The root mean square amplitude is defined as the average of the squared amplitude of the signal. VdB is commonly used to measure the root mean square. (ENTECH, p. 15.)

Existing Site and Surrounding Conditions

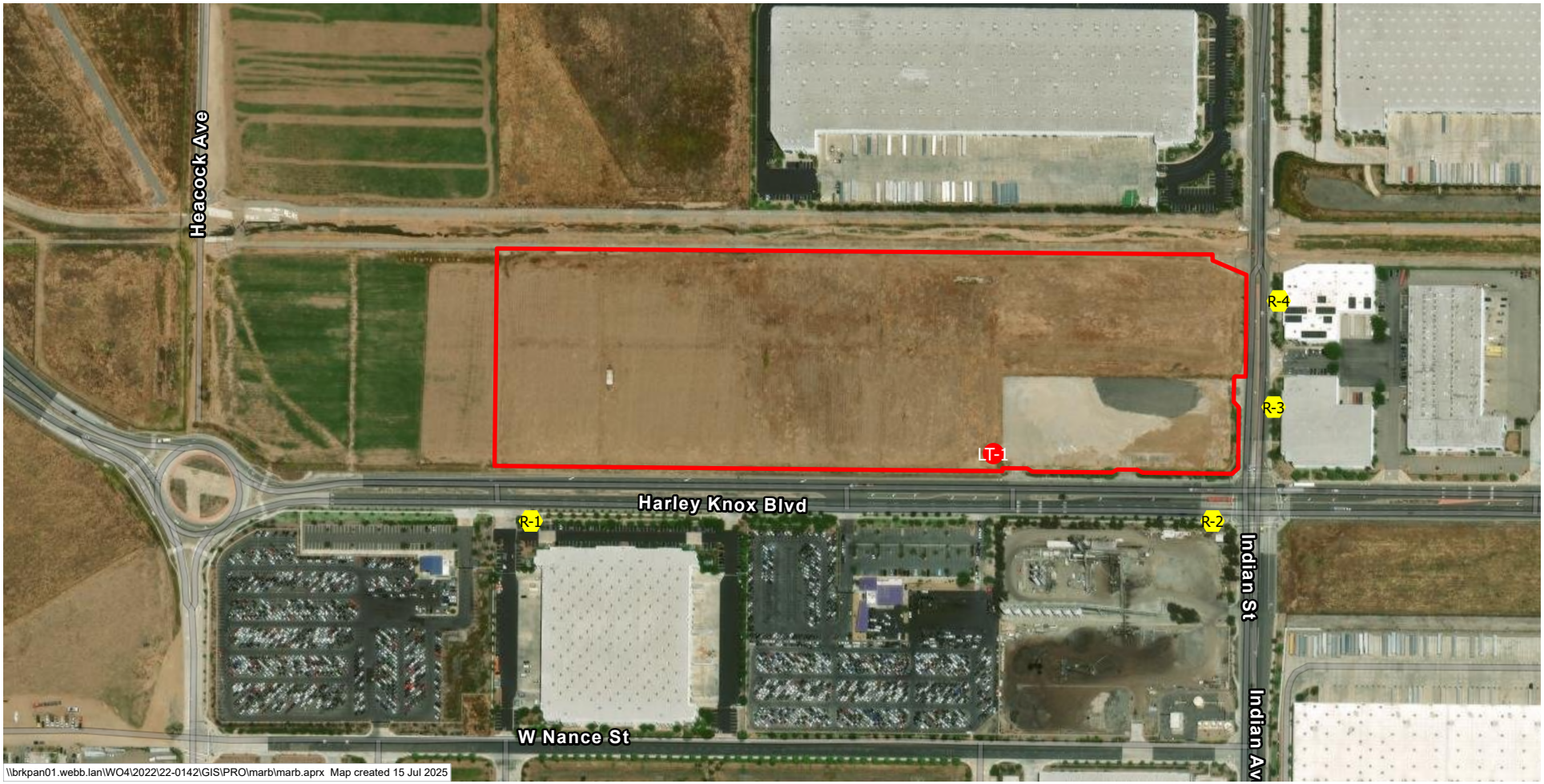
The Project site encompasses approximately 25.10 gross acres of vacant unimproved land, located at the northwest corner of Harley Knox Boulevard and Indian Avenue. The proposed Project also includes a 1.10-acre off-site improvement area for improvements in Harley Knox Boulevard and Indian Avenue, and a drainage connection to the Riverside County Flood Control and Water Conservation District, Line B, located to the north of the Project site. The Project site is bordered by the industrial uses, vacant land and the PVSD Lateral B to the north (within the City of Moreno Valley), warehouse uses to the east, vehicle auction storage and asphalt manufacturing uses to the south, and vacant land to the west, as shown on **Figure 3-2 – Aerial Map**.

The Project site is located within the Perris Valley Commerce Center (PVCC) area of the City of Perris and is subject to the Perris Valley Commerce Center Specific Plan (PVCCSP). The PVCCSP was adopted by the City on January 10, 2012 and last amended on October 10, 2023. PVCCSP EIR Section 4.9 includes an overview of noise and acoustical fundamentals as well as a comprehensive discussion of existing noise levels, standards and regulations to control noise, and short and long-term noise impacts related to construction, operation, and increased traffic. The PVCCSP EIR concluded that potential noise impacts as a consequence of development consistent with the PVCCSP would be reduced to less than significant levels with mitigation. (PVCCSP EIR, p. IV-4.9-19 - IV-4.9-35)

The Noise Impact Study evaluates noise levels at land uses surrounding the Project site. Four industrial receptors were identified to evaluate the proposed Project's operational impacts. These receptors are shown on **Figure 5.6-1 – Receptor and Measurement Locations** and labeled R1, R2, R3, and R4.

FIGURE 5.6-1

Receptor and Measurement Locations



LEGEND

- Project Boundary
- Long-term Measurement Location
- Receptor Locations

0 230 460 Ft

Sources: Exhibit H and Exhibit I, Noise Impact Study

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Existing Noise Levels

The existing ambient noise environment was characterized by collecting field noise measurement at the property boundary of the Project site. One long-term 24-hour ambient noise measurement was conducted at the Project site on March 12, 2024, at the location identified as LT-1 on **Figure 5.6-1**.

To document existing noise levels in the Project area, a Larson Davis CAL 200 precision sound level meter was used. The noise meter was programmed in "slow" mode to record noise levels in the "A" weighted form. The sound level meter and microphone were mounted, five feet above the ground, and equipped with a windscreen during all measurements. The Larson Davis sound level meter was calibrated before the monitoring. All noise level measurement equipment meets American National Standards Institute specifications for sound level meters. (ENTECH, p. 22.) Measurements taken at LT-1 are shown below in **Table 5.6-C – Existing (Ambient) Long-Term (24-hour) Noise Level Measurements**.

Table 5.6-C – Long-Term Noise Measurement Data (dBA) Location LT1

Date	Time	1-Hour dBA							
		L_{eq}	L_{max}	L_{min}	L_2	L_8	L_{25}	L_{50}	L_{90}
3/12/2024	0:00AM-1:00AM	62.9	77.3	51.7	69.8	67.0	63.7	59.9	54.3
3/12/2024	1:00AM-2:00AM	60.5	74.9	49.3	67.4	64.6	61.3	57.5	51.9
3/12/2024	2:00AM-3:00AM	59.3	73.7	48.1	66.2	63.4	60.1	56.3	50.7
3/12/2024	3:00AM-4:00AM	57.5	71.9	46.3	64.4	61.6	58.3	54.5	48.9
3/12/2024	4:00AM-5:00AM	58.5	72.9	47.3	65.4	62.6	59.3	55.5	49.9
3/12/2024	5:00AM-6:00AM	62.3	76.7	51.1	69.2	66.4	63.1	59.3	53.7
3/12/2024	6:00AM-7:00AM	68.7	83.1	57.5	75.6	72.8	69.5	65.7	60.1
3/12/2024	7:00AM-8:00AM	71.0	85.4	59.8	77.9	75.1	71.8	68.0	62.4
3/12/2024	8:00AM-9:00AM	69.1	83.5	57.9	76.0	73.2	69.9	66.1	60.5
3/12/2024	9:00AM-10:00AM	68.1	82.5	56.9	75.0	72.2	68.9	65.1	59.5
3/12/2024	10:00AM-11:00AM	68.0	82.4	56.8	74.9	72.1	68.8	65.0	59.4
3/12/2024	11:00AM-12:00PM	68.2	82.6	57.0	75.1	72.3	69.0	65.2	59.6
3/12/2024	12:00PM-1:00PM	68.3	82.7	57.1	75.2	72.4	69.1	65.3	59.7
3/12/2024	1:00PM-2:00PM	68.4	82.8	57.2	75.3	72.5	69.2	65.4	59.8
3/12/2024	2:00PM-3:00PM	68.6	83.0	57.4	75.5	72.7	69.4	65.6	60.0
3/12/2024	3:00PM-4:00PM	69.8	84.2	58.6	76.7	73.9	70.6	66.8	61.2
3/12/2024	4:00PM-5:00PM	71.3	85.7	60.1	78.2	75.4	72.1	68.3	62.7
3/12/2024	5:00PM-6:00PM	71.0	85.4	59.8	77.9	75.1	71.8	68.0	62.4
3/12/2024	6:00PM-7:00PM	69.3	83.7	58.1	76.2	73.4	70.1	66.3	60.7
3/12/2024	7:00PM-8:00PM	67.9	82.3	56.7	74.8	72.0	68.7	64.9	59.3
3/12/2024	8:00PM-9:00PM	66.8	81.2	55.6	73.7	70.9	67.6	63.8	58.2
3/12/2024	9:00PM-10:00PM	66.1	80.5	54.9	73.0	70.2	66.9	63.1	57.5
3/12/2024	10:00PM-11:00PM	65.1	79.5	53.9	72.0	69.2	65.9	62.1	56.5
3/12/2024	11:00PM-12:00AM	64.5	78.9	53.3	71.4	68.6	65.3	61.5	55.9
CNEL		71.7							

Source: ENTECH, Table 2.

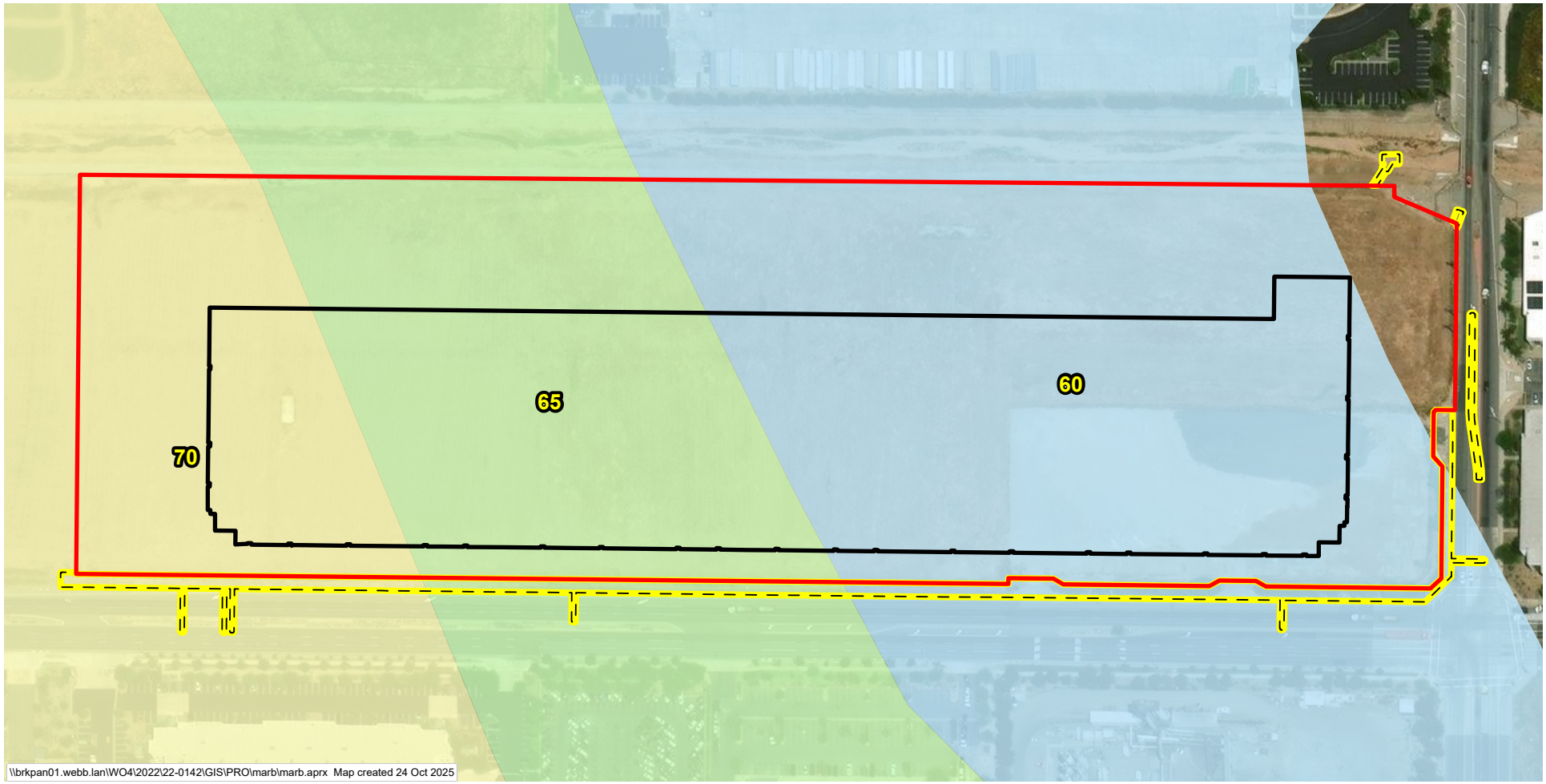
As shown in **Table 5.6-C**, the existing ambient noise level in the Project area is approximately 71.7 dBA CNEL.

Airport Noise

As shown on **Figure 5.6-2 – AICUZ Airport Noise Contours**, the Project Site is located within the 60, 65, and 70 dBA noise contours. **Figure 5.6-2** shows a portion of the southwest portion of the Project site and the buildings is located within the 70 CNEL contour, while the remainder of the Project is located in the 60-65 CNEL contour.

FIGURE 5.6-2

AICUZ Airport Noise Contours



LEGEND

- Building Footprint
- Project Boundary
- Offsite Disturbance Footprint

Contour Level

- 60 dBA
- 65 dBA
- 70 dBA

N

0 115 230 Feet

Source: MARB AICUZ 2018; Nearmap, 2024.

ALBERT A. WEBB ASSOCIATES

Noise Modeling Procedures

Construction Noise

The magnitude of the noise impact during construction is a function of the type of construction activity, equipment, duration of the construction activity, distance between the construction noise source and receptor, and intervening structures. The Noise Impact Study modeled a worst-case construction noise scenario to estimate the loudest activities occurring at the Project site. The type and quantity of off-road construction equipment that may be used during Project construction are shown in **Table 5.6 D – Equipment by Construction Activity**. Additional on-road vehicles would be accessing the Project site for miscellaneous deliveries and for construction worker trips. During concrete pouring activities, the Applicant estimates approximately five (5) concrete mixing trucks would be operating on-site at one time. (ENTECH, Appendix D.)

Table 5.6-D – Equipment by Construction Activity

Construction Activity	Off-Road Equipment	Unit Amount
Grading	Excavator	2
	Rubber Tired Dozers	1
	Tactors/Loaders/Backhoes	2
	Grader	1
	Scrapers	2
Building Construction	Crane	1
	Forklifts	3
	Generator Sets	1
	Tactors/Loaders/Backhoes	3
	Welders	1
Paving	Pavers	1
	Paving Equipment	1
	Rollers	1
Architectural Coating	Air compressors	1

Source: ENTECH, Appendix D.

Using the noise sources identified in **Table 5.6-D**, a noise analysis was performed using the Federal Highway Administration's Roadway Construction Noise Model. The model input and results are detailed in the Noise Impact Study, which is Appendix F to this Draft EIR. The construction noise assessment is focused on noise levels from the Project site to the nearest receptors, R1 through R4, which are industrial uses to the south and to the east as shown on **Figure 5.6-1 – Receptor and Monitoring Locations** above. R1 is located at the property boundary of an industrial use to the southwest of the Project site. R2 is located at the property boundary of an industrial use to the southeast. R3 and R4 are located at the property boundary of two industrial uses to the east.

Construction noise is usually short-term and creates a temporary impact on ambient noise for a period of a time. **Table 5.6-E – Proposed Construction Schedule** provides an estimated construction period based on engineering and Applicant estimates. As shown below, the construction period is approximately 12 months.

Table 5.6-E – Proposed Construction Schedule

Construction Activity	Start Date	End Date	Total Working Days
Site Preparation	06/01/2025	06/29/2025	20
Grading	06/30/2025	08/10/2025	30
Building Construction	08/11/2025	05/11/2026	196
Paving	04/14/2026	05/11/2026	20
Architectural Coatings	03/31/2026	05/11/2025	30

Source: WEBB, Appendix B.

Operational Noise

The Noise Impact Study (Appendix F of this Draft EIR) used the following basic parameters in the modeling assumptions. The Project Applicant proposes one building with approximately 549,786 square feet of floor area to accommodate a non-refrigerated warehouse and supporting office use. The building includes 94 dock doors. The proposed office space would be equipped with heating, ventilation, and air-conditioning (HVAC) equipment. The Noise Impact Study identified the following primary non-transportation noise sources associated with the Project; HVAC equipment, on-site parking lot circulation, and loading docks activity. For the model, it was assumed worst-case scenarios where all noise sources are always operational when in reality, the noise sources would be intermittent and would cycle on/off depending on customer usage. (ENTECH, p 29.)

Roadway Noise

Roadway noise level increases from vehicular traffic were modeled utilizing the Federal Highway Administration Traffic Noise Prediction Model – FHWA-RD-77-108 for the following scenarios: existing with and without the Project and opening day with and without the Project. (ENTECH, p. 23.) The modeling calculations take into account the roadway classification, active roadway width, posted vehicle speed, total average daily traffic volumes, estimated vehicle mix, roadway grade, angle of view, site conditions, and the percentage of average daily traffic which flows each hour throughout a 24-hour period. The modeling does not take into account any existing barriers, structures, and/or topographical features that may further reduce noise levels. (ENTECH, p. 27.)

5.6.2 Related Regulations

To limit the population's exposure to physically and/or psychologically damaging noise levels, the federal government, the State, various County governments, and most municipalities in California have established standards and ordinances to control noise.

Federal Regulations

Federal Noise Control Act of 1972

The U.S. Environmental Protection Agency (EPA) Office of Noise Abatement and Control issued the Federal Noise Control Act of 1972, establishing programs and guidelines to identify and address the effects of noise on public health, welfare, and the environment. (EPA-A). The EPA also published *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety* (*Levels of Environmental Noise*). *Levels of Environmental Noise* recommends that the L_{dn} should not exceed 55 dBA outdoors or 45 dBA indoors in order to prevent significant activity interference and annoyance in noise-sensitive areas. (EPA-B, p. 4)

In addition, *Levels of Environmental Noise* identified 5 dBA as an "adequate margin of safety" for a noise level increase relative to a baseline noise exposure level of 55 dBA L_{dn}. In other words, there would not be a noticeable increase in adverse community reaction with an increase of five dBA or less from this baseline level. (EPA-B, p. 34) The EPA did not promote these findings as universal standards or regulatory goals with mandatory applicability to all communities, but rather as advisory exposure levels below which there would be no risk to a community from any health or welfare effect of noise.

In 1981, EPA administrators determined that subjective issues such as noise would be better addressed at lower levels of government. Consequently, in 1982 responsibilities for regulating noise control policies were transferred to State and local governments. However, noise control guidelines and regulations contained in EPA rulings in prior years remain in place by designated Federal agencies, allowing more individualized control for specific issues by designated Federal, State, and local government agencies. (EPA-C)

Federal Transit Administration and Federal Railroad Administration Standards

Although the FTA standards are intended for federally-funded mass transit projects, the impact assessment procedures and criteria included in the FTA *Transit Noise and Vibration Impact Assessment Manual (September 2018)* are routinely used for projects proposed by local jurisdictions. The FTA and Federal Railroad Administration have published guidelines for assessing the impacts of ground-borne vibration associated with rail projects, which have been applied by other jurisdictions to non-rail projects. The FTA measure of the threshold of architectural damage for conventional sensitive structures is 0.2 inch per second PPV. (FTA 2018, p 186.)

Occupational Health and Safety Administration

The federal government regulates occupational noise exposure common in the workplace through the US Environmental Protection Agency Occupational Health and Safety Administration (OSHA). Noise regulations apply to the operation of construction equipment and may apply to industrial land uses. Noise exposure of this type is dependent on work conditions and is addressed through a facility's Health and Safety Plan, as required by OSHA, and will not be addressed further in this analysis.

State Regulations

California Noise Control Act of 1973

California Health and Safety Code Sections 46000 through 46080, known as the California Noise Control Act of 1973, declares that excessive noise is a serious hazard to the public health and welfare and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. It also identifies a continuous and increasing bombardment of noise in the urban, suburban, and rural areas. The California Noise Control Act declares that the State of California has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the State to provide an environment for all Californians free from noise that jeopardizes their health or welfare.

California Noise Insulation Standards (California Code of Regulations Title 24)

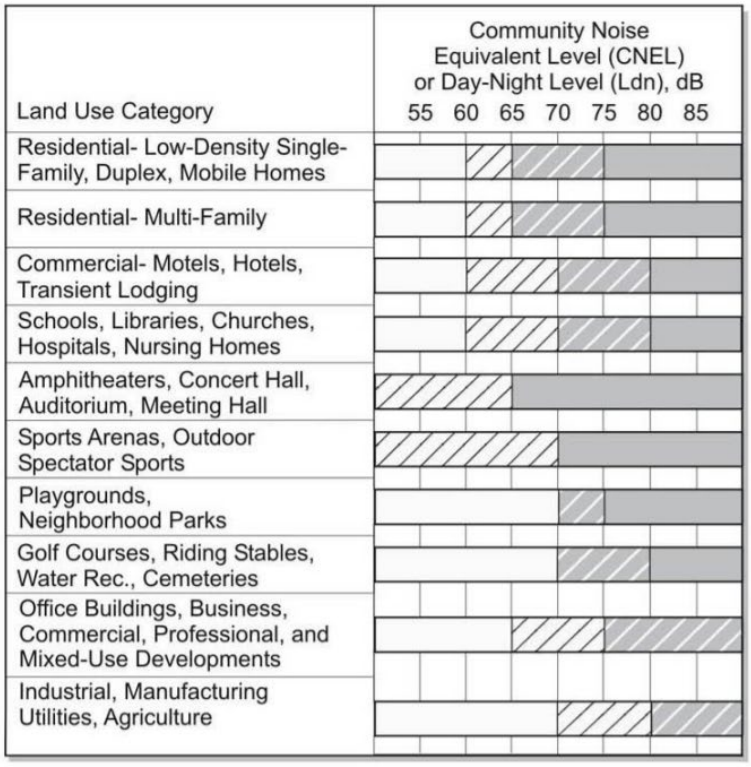
In 1974, the California Commission on Housing and Community Development adopted noise insulation standards for hotels, motels, dormitories, and multi-family residential buildings. (CCR Title 24, Part 2). Title 24 establishes standards for interior room noise (attributable to outside noise sources). This State standard indicates that interior noise levels attributable to exterior noise sources shall not exceed 45 dB (CNEL or L_{dn}) in any habitable room.

State of California General Plan Guidelines

Though not adopted by law, the State of California *General Plan Guidelines* published by the then California Governor's Office of Planning and Research (OPR) (now the Governor's Office of Land Use and Climate Innovation) provide guidance for the compatibility of projects within areas of specific noise exposure. The *General Plan Guidelines* identify the suitability of various types of construction relative to a range of outdoor noise levels and provide each local community some flexibility in setting local noise standards that allow for the variability in community preferences. (OPR 2017, pp. 131-140). Findings presented in *Levels of Environmental Noise* (EPA 1974) influenced the recommendation of the *General Plan Guidelines*, most importantly in the choice of noise exposure metrics (i.e. L_{dn} or CNEL) and in the upper limits for the Normally Acceptable outdoor exposure of noise-sensitive uses. The *General Plan Guidelines* include a Noise and Land Use Compatibility Matrix that identifies acceptable and unacceptable community noise exposure limits for various land use categories.

The City of Perris has utilized the State's noise/land use compatibility matrix as a model to create their own. The matrix for community noise prepared by the State of California, Department of Health, as adopted by the City of Perris is shown in the City of Perris General Plan 2030 Noise Element Exhibit N-1 (reproduced herein as **Table 5.6-F – City of Perris Land Use Compatibility Guidelines**). The compatibility guidelines identify "normally acceptable," "conditionally acceptable," and "clearly unacceptable" noise levels for siting various new land uses. A conditionally acceptable designation implies new development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use is made and the needed noise insulation features are incorporated in the design. By comparison, a normally acceptable designation indicates that standard construction can occur with no special noise reduction requirements.

Table 5.6-F – City of Perris Land Use Compatibility Guidelines



Nature of the noise environment where the CNEL or Ldn level is:

Below 55 dB
Relatively quiet suburban or urban areas, no arterial streets within 1 block, no freeways within 1/4 mile.

55-65 dB
Most somewhat noisy urban areas, near but not directly adjacent to high volumes of traffic.

65-75 dB
Very noisy urban areas near arterials, freeways or airports.

75+ dB
Extremely noisy urban areas adjacent to freeways or under airport traffic patterns. Hearing damage with constant exposure outdoors.

Normally Acceptable
Specific land use is satisfactory, based on the assumption that any building is of normal conventional construction, without any special noise insulation requirements

Conditionally Acceptable
New construction or development should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features included in design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

Normally Unacceptable
New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in design.

Clearly Unacceptable
New construction or development should generally not be undertaken.

The Community Noise Equivalent Level (CNEL) and Day-Night Noise Level (Ldn) are measures of the 24-hour noise environment. They represent the constant A-weighted noise level that would be measured if all the sound energy received over the day were averaged. In order to account for the greater sensitivity of people to noise at night, the CNEL weighting includes a 5-decibel penalty on noise between 7:00 p.m. and 10:00 p.m. and a 10-decibel penalty on noise between 10:00 p.m. and 7:00 a.m. of the next day. The Ldn includes only the 10-decibel weighting for late-night noise events. For practical purposes, the two measures are equivalent for typical urban noise environments.

Business and Professions Code

Business and Professions Code Section 11010 and Civil Code Sections 1102.6, 1103.4, and 1353 address buyer notification requirements for lands around airports. Any person who intends to offer subdivided lands, common interest developments, and residential properties for sale or lease within an airport influence area is required to disclose that fact to the person buying the property.

Regional Regulations

Riverside County Airport Land Use Plan

On April 26, 1984, the Riverside County Airport Land Use Commission (ALUC) adopted the Riverside County Airport Land Use Plan. (1984 ALUP.) This plan established land use restrictions within the Airport-Influenced Areas that were adopted by ALUC around airports in Riverside County. In 1986, airport-influenced areas were established around March Air Force Base (which was realigned and converted to March Air Reserve Base/Inland Port Airport (March ARB/IPA) on April 1, 1996. The airport influence area around March ARB/IPA was divided into three land use planning areas: Area I, Area II, and Area III. The Project site is located in Influence Area II. Influence Area II encompasses larger land areas. Agricultural, industrial, and commercial uses are permitted. The boundaries follow general flight paths and coincide with areas where aircraft would be turning and applying or reducing power. (Perris GP 2030 EIR, p. IV-35.)

Air Installation Compatible Use Zone Study

The 2005 March ARB Air Installation Compatible Use Zone (AICUZ) Study provides noise contours produced by aircraft operations at March ARB, based upon the day-night average a-weighted sound level (L_{dn}) metric used by the United States Air Force and CNEL used by the State of California. The AICUZ Study also provides the information necessary to maximize beneficial use of the land surrounding March ARB, including the March Joint Powers Authority, while minimizing the potential for degradation of the health and safety of the affected public. The basic objective of the AICUZ program is to achieve compatible uses of public and private lands in the vicinity of military airfields by controlling incompatible development through local actions. The March ARB AICUZ Study provides compatible use guidelines for land use areas around the base which is provided to assist local communities in future planning and zoning activities.

In 2018, the AICUZ Study was revised to account for new aircraft, operational changes, and flight tracks at March ARB. This revision is hereinafter referred to as the 2018 AICUZ Study. As with the original AICUZ Study, the 2018 AICUZ Study evaluated aircraft noise and accident potential to support local planning that ensures public safety and health and welfare while preserving the base operations. The 2018 AICUZ Study identifies runway clear zones, accident potential zones, and noise contours. The 2018 AICUZ Study shows a significant reduction in noise footprint and exposure at March ARB compared to the 2005 AICUZ Study, primarily due to updated methodologies, newer noise models, and quieter aircraft engines. The off-base area subject to noise exposure above 60 dB CNEL identified in the 2018 AICUZ Study decreased by approximately 1,950 acres from what was shown in the 2005 AICUZ Study.

The Project site is located within the 60, 65, and 70 dB CNEL noise contours as shown on **Figure 5.6-2 – AICUZ Airport Noise Contours**. Table MA-2 of the March ARB/IPA ALUCP states office space must have sound attenuation features sufficient to reduce the exterior aviation-related noise to no more than CNEL 45 dBA. (ALUC-A, p. 11.)

March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan

On November 13, 2014, ALUC adopted the March ARB/IPA Airport Land Use Compatibility Plan (ALUCP). The compatibility zones and associated criteria set forth in the March ARB/IPA ALUCP provide noise and safety compatibility protection. The proposed Project site is located within Compatibility Zones A, B1-APZ1, B2, and C1 as shown on **Figure 3.0-7 – March Air Reserve Base/Inland Port Airport Compatibility Zones**. As shown on this figure, a small portion of the northwest corner of Project site, is within Zone A which is defined as "Clear Zone." Properties within Zone A would experience a "very high" noise impact, be subject to a high CNEL and single-event noise levels from March ARB/IPA operations. The western portion of the proposed Project site is located within Zone B1-APZI and Zone B2, Zone B1 is the "Inner Approach/Departure Zone." Properties in Zone B1 and Zone B2 are within or near the 65 CNEL noise contour and are expected to experience a "high" noise impact from airport noise and overflight factors. A small portion of the Project site on the northeast is in Zone C1, which is the Primary Approach/Departure Zone. Properties within Zone C1 are within or near the 60 CNEL noise contour and are expected to experience a moderate to high noise impact from March ARB/IPA operations. Therefore, the Project is subject to "single-event noise" sufficient to disrupt many land use activities. (March ARB/IPA ALUCP, p. 3.)

Local Regulations

City of Perris Comprehensive General Plan 2030

The following are applicable goals, policies and measures from the City of Perris Comprehensive General Plan Noise Element (adopted 2005, amended 2016) related to impacts from noise:

Noise Element

Goal I	Future land uses compatible with projected noise environments.
Policy I.A	The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development.
Measure I.A.1	All new development proposals will be evaluated with respect to the State Noise/Land Use Compatibility Criteria. Placement of noise sensitive uses will be discouraged within any area exposed to exterior noise levels that fall into the "Normally Unacceptable" range and prohibited within areas exposed to "Clearly Unacceptable" noise ranges.
Measure I.A.3	Acoustical studies shall be prepared for all new development proposals involving noise sensitive land uses, as defined in Section 16.22.020J of the Perris Municipal Code, where such projects are adjacent to roadways and within existing or projected roadway CNEL levels of 60 dBA or greater.
Measure I.A.4	As part of any approvals of noise sensitive projects where reduction of exterior noise to 65 dBA is not reasonably feasible, the City will require the developer to issue disclosure statements to be identified on all real estate transfers associated with the affected property that identifies regular exposure to roadway noise.
Goal IV	Future land uses compatible with noise from air traffic.
Policy IV.A	Reduce or avoid the existing and potential future impacts from air traffic on new sensitive noise land uses in areas where air traffic noise is 60 dBA CNEL or higher.
Measure IV.A.1	As part of any approvals for new sensitive land uses within the 60 dBA CNEL or higher noise contours associated with March Inland Port, and for such new uses

within the flight paths associated with the Perris Valley Skydiving Center, the City will require the developer to issue disclosure statements identifying exposure to regular aircraft noise. This disclosure shall be issued at the time of initial and all subsequent sales of the affected properties.

Measure IV.A.2 All new development proposals in the noise contour areas of 60 dBA and above will be evaluated with respect to the State Noise/Land Use Compatibility Criteria.

Policy V.A New large scale commercial or industrial facilities located within 160 feet of sensitive land uses shall mitigate noise impacts to attain an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria.

Measure V.A.1 An acoustical impact analysis shall be prepared for new industrial and large scale commercial facilities to be constructed within 160 feet of the property line of any existing noise sensitive land use. This analysis shall document the nature of the commercial or industrial facility as well as all interior or exterior facility operations that would generate exterior noise. The analysis shall document the placement of any existing or proposed noise-sensitive land uses situated within the 160-foot distance. The analysis shall determine the potential noise levels that could be received at these sensitive land uses and specify specific measures to be employed by the large scale commercial or industrial facility to ensure that these levels do not exceed 60 dBA CNEL at the property line of the adjoining sensitive land use. No development permits or approval of land use applications shall be issued until the acoustic analysis is received and approved by the City Staff.

Perris Municipal Code

According to Perris Municipal Code, Chapter 7.34, excessive noise levels are detrimental to the health and safety of individuals. Noise is considered a public nuisance, and the City discourages unnecessary, excessive or annoying noises from all sources. The Perris Municipal Code addresses noise impacts in terms of the CNEL and does not set short-term noise limitations.

Section 7.34.040 – Sound amplification:

No person shall amplify sound using sound amplifying equipment contrary to any of the following:

A. The only amplified sound permitted shall be either music or the human voice, or both.

B. The volume of amplified sound shall not exceed the noise levels set forth in this subsection when measured outdoors at or beyond the property line of the property from which the sound emanates.

Table 5.6-G – City of Perris Outdoor Noise Regulations

Time Period	Maximum Noise Level
10:01 PM – 7:00 AM	60 dBA
7:01 AM – 10:00 PM	80 dBA

Source: Perris Municipal Code Section 7.34.040.

Section 7.34.050 – General prohibition:

A. It is unlawful for any person to willfully make, cause or suffer, or permit to be made or caused, any loud excessive or offensive noises or sounds which unreasonably disturb the peace and quiet of any residential neighborhood or which are physically annoying to persons of ordinary sensitivity or which are so harsh, prolonged or unnatural or unusual in their use, time or place as to occasion physical discomfort to the inhabitants of the city, or any section thereof. The standards for dBA noise level in Section 7.34.040 shall apply to this section. To the extent that the noise created causes the noise level at the property line to exceed the ambient noise level by more than 1.0 decibels, it shall be presumed that the noise being created also is in violation of this section.

B. The characteristics and conditions which should be considered in determining whether a violation of the provisions of this section exists should include, but not be limited to, the following:

1. The level of the noise;
2. Whether the nature of the noise is usual or unusual;
3. Whether the origin of the noise is natural or unnatural;
4. The level of the ambient noise;
5. The proximity of the noise to sleeping facilities;
6. The nature and zoning of the area from which the noise emanates and the area where it is received;
7. The time of day or night the noise occurs;
8. The duration of the noise; and
9. Whether the noise is recurrent, intermittent or constant.

Section 7.34.060 – Construction noise:

It is unlawful for any person between the hours of seven p.m. of any day and seven a.m. of the following day, or on a legal holiday, with the exception of Columbus Day and Washington's birthday, or on Sundays to erect, construct, demolish, excavate, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise. Construction activity shall not exceed 80 dBA L_{max} in residential zones in the city. (Ord. 1082 § 2(part), 2000.)

Chapter 16.22 – Construction Located Near Arterials, Railroads and Airports, clarifies terminology relative to noise.

The purpose of this chapter is to establish standards of insulation against noise for areas in the vicinity of arterials, railroads, and airports where the exterior community noise equivalent level (CNEL) exceeds 60 dB. (PMC 16.22.010)

Section 16.22.020 – Definitions:

"Noise-sensitive land uses" include, but are not limited to: residences, schools, libraries, hospitals, churches, offices, hotels, motels, and outdoor recreational areas. Noise-sensitivity factors include interference with speech communication, subjective judgment of

noise acceptability and relative noisiness, priced for freedom from noise intrusion, and sleep interference criteria.

PVCCSP Standards and Guidelines and PVCCSP EIR Mitigation Measures

The PVCCSP contains Development Standards and Guidelines pertaining to the analysis of noise impacts. As suggested by the PVCCSP, specific standards and guidelines best suited to each individual project should be identified and incorporated into the project design. The Development Standards and Guidelines relevant to the proposed Project are identified below:

Hours of Operation

Depending on the type of use and activities proposed by the industrial, commercial or professional/office development, the Development Services Department may impose restrictions on hours of operation for construction, as well as business operation.

Screening

Proposed industrial, commercial or professional/office developments will need to screen operations for residential views through landscape and/or wall screening.

Supplemental to the Development Standards and Guidelines applicable to the proposed Project, the PVCCSP EIR incorporates mitigation measures designed to avoid or reduce the potential for significant adverse noise impacts on or by projects located within the PVCC area.

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

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

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

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

As specified in the PVCCSP EIR, Perris Municipal Code Chapter 7.34 Noise Control codifies the Perris Noise Ordinance, which incorporates California Noise Insulation Standards pursuant to the California Code of Regulations, Title 25, Chapter 1, Subchapter 1.

Because there are no sensitive receptors near the Project site, PVCCSP EIR **MM Noise 2** and **MM Noise 3** are not applicable to the Project.

Summary

The City of Perris General Plan 2030 Noise Element lists the noise standard for fixed noise sources at 60 dBA CNEL at the nearest noise-sensitive land use. The Perris Noise Ordinance lists the noise standard for fixed noise sources at 60 dBA L_{max} during nighttime hours (10:01 p.m. to 7:00 a.m.) and 80 L_{max}

during daytime hours (7:01 a.m. to 10:00 p.m.). For a summary of City of Perris noise standards, see **Table 5.6-H– City of Perris Noise Standards Summary**, below.

Table 5.6-H – City of Perris Noise Standards Summary

Noise Standard Summary	
Off-Site Roadway Noise	65 dBA CNEL for roadway segments with fronting residential and school uses
	75 dBA CNEL for roadway segments with fronting industrial, office, or commercial uses
On-site Truck Noise	60 dBA L_{max}
On-site Noise/Other Sources	60 dBA L_{max}
Construction Noise	80 dBA L_{max} with time restrictions
Interior Noise	45 dBA CNEL for residences

Because the proposed Project is industrial, it is not a noise-sensitive land use as defined by Perris Municipal Code Section 16.22.020. The nearest sensitive receptor to the Project site are existing residential properties southwest of the Project site along Nevada Avenue, approximately 1,960 feet away..

Traffic

The City specifies outdoor and indoor noise limits for industrial and residential uses, places of worship, educational facilities, hospitals, hotels/motels, commercial and other land uses. The City's exterior standard for industrial land uses are normally acceptable in areas up to 70 dBA CNEL and conditionally acceptable up to 80 dBA CNEL. Residential land uses are conditionally acceptable at 65 dBA CNEL.

Construction

Construction noise is considered a short-term impact and would be considered significant if construction activities are undertaken outside the allowable times as defined in Perris Municipal Code Section 7.34.060 and exceed 80 dBA in residential zones.

5.6.3 Design Considerations

Design considerations refer to ways in which the proposed Project would reduce potential noise impacts. The Project site is located within the PVCC area. The PVCCSP includes Development Standards and Guidelines to address the potential for noise impacts resulting from industrial, commercial, and professional office land uses adjacent to residential development, identified as sensitive receptors. The Project would include screening and landscaping, consistent with City and PVCCSP standards, and include a 14-foot-high screen wall located near the eastern portion of the building to screen the view of the truck parking areas and loading bays from Indian Avenue.

As required by Riverside County ALUC, "Notice of Airport in Vicinity" would be provided to all prospective purchasers and tenants, and recorded as a deed notice. ALUC conditions also require the office portions of the proposed logistics center building shall incorporate noise measures as necessary to reduce interior noise levels from aircraft operation at or below 45 CNEL. (ALUCP-A, p. 2-31.)

5.6.4 Comments Received in Response to the Notice of Preparation

No comment letters or written comments were received related to noise in response to the Notice of Preparation. All comment letters are identified in **Table 2.0 A –Written Comments Received During the Notice of Preparation Comment Period** and included in their entirety in Appendix A.

One verbal comment related to noise was received at the June 18, 2025, Draft EIR public scoping meeting. The verbal comment is summarized in **Table 2.0-B – Verbal Comments Received During the Draft EIR Scoping Meeting**. This noise related comment is addressed in this Section.

5.6.5 Thresholds of Significance

The City of Perris has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G of the *CEQA Guidelines*.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project could have potentially significant impacts in the following areas and these topics are addressed in this Draft EIR:

- 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.
- Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in local general plan or noise ordinance, or applicable standards of other agencies;
- Generation of excessive ground-borne vibration or ground-borne noise levels; or,

There is no official “industry standard” of determining significance for noise impacts. However, typically, a jurisdiction will identify either a 3 dBA or 5 dBA increase as being the threshold because these levels represent varying levels of perceived noise increases. The PVCCSP EIR states that a change in 5 dBA is “readily discernable to most people in an exterior environment.” Accordingly, for purposes of the analysis included herein, an increase of 5 dBA is considered discernable to most people in an exterior environment when the existing noise levels are below 60 dBA. Further, it identifies a 3-dBA increase threshold when the existing ambient noise levels already exceed 60 dBA. (PVCCSP EIR, p. 4.9-20.)

Vibration can cause damage to buildings and become a human annoyance. The FTA measure of the threshold of architectural damage for conventional sensitive structures is 0.2 in/sec PPV. (FTA 2018, p 186.) The City does not have adopted standards and defers to the FTA’s threshold for architectural damage. **Table 5.6-I – Construction Vibration Damage Criteria** below, outlines the FTA’s vibration standards to evaluate potential building damage impacts related to construction activities.

Table 5.6-I – Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

Source: FTA 2018, p. 186

Annoyance from vibration often occurs when the vibration levels exceed the threshold of perception, 65 VdB, by only a small margin. (FTA 2018, p. 120; ENTECH, p. 15.) A vibration velocity level of 75 VdB is considered to be the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. (FTA 2018, p. 120.) The FTA adopted the following standards for ground-borne vibration impacts related to human annoyance: Vibration Category 1 – High Sensitivity, Vibration Category 2 – Residential, and Vibration Category 3 – Institutional. Thresholds and category definitions can be found in **Table 5.6-J – Groundborne Vibration Impact Criteria for General Assessment.** In the PVCCSP EIR, the City of Perris utilizes the FTA vibration threshold of 80 VdB as the maximum acceptable vibration standard for infrequent events. (PVCCSP EIR, p. 4.9-8.)

Table 5.6-J – Groundborne Vibration Impact Criteria for General Assessment

Land Use Category	Frequent Events	Occasional Events	Infrequent Events
Category 1: Buildings where vibration would interfere with major operations	65 VdB[d]	65 VdB[d]	65 VdB[d]
Category 2: Residences and buildings where people would normally sleep	72 VdB	75 VdB	80 VdB
Category 3: Institutional and uses with primarily daytime use	75 VdB	78 VdB	83 VdB

Source: FTA 2018, Table 6-2 and Table 6-3
Notes
a) "Frequent Events" is defined as more than 70 vibration events of the same source per day.
b) "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.
c) "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day.
d) This criterion is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes.

5.6.6 Environmental Impacts Before Mitigation

Threshold A: *Would the Project result in generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in local general plan or noise ordinance, or applicable standards of other agencies?*

The City has identified noise levels of up to 70 dBA CNEL as "normally acceptable" and of up to 80 dBA CNEL as "conditionally acceptable" for industrial, manufacturing, utilities, and agriculture use (see **Table 5.11-F**). In this regard, the phrase "normally acceptable" is defined by the City as "[s]pecific land use is satisfactory based on the assumption that any building is of normal conventional construction, without any special noise insulation requirements." Likewise, the phrase "conditionally acceptable" is defined as "[n]ew construction or development should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice." (Perris GP 2030 EIR, p. IV-119.)

Noise impacts generally fall into two broad categories with respect to all types of projects and noise standards: noise impacts *from* a project and noise impacts *to* a project. The first category is the noise created by the uses or traffic associated with a project. The second category of noise impacts is noise created off-site that may cause unacceptable levels of noise within buildings or outdoor areas to a project site.

Construction Noise Impacts

Construction noise associated with the Project was analyzed using the Roadway Construction Noise Model. It was assumed that the construction for the Project parcels would take place over approximately 12 months. It was assumed that the Project development would occur in one phase and would consist of mass grading, building construction, paving, and painting activities. All construction activities would create temporary periods of noise when heavy construction equipment is in operation and would cause a short-term increase in ambient noise levels. Project construction noise levels were assessed within 50 feet of the Project site boundary assuming that equipment would be operating simultaneously at the edge of the Project site boundary. (ENTECH, p. 35.) **Table 5.6-K – Construction Noise Levels by Construction Phase**, presents the noise levels in dBA L_{max} for each construction phase. Concrete pouring may occur during the daytime and nighttime hours during hot weather. All other construction activities would occur during the daytime hours only.

Table 5.6-K – Construction Noise Levels by Construction Phase

Location	Phase	Construction Noise Level[1] dBA L_{max}	
		Daytime	Nightime[2]
50 Feet from Project Site	Grade	92.9	None
	Build	93.2	92.8
	Pave	92.5	None
	Arch Coat	78.0	None

Source: ENTECH, Appendix D.
Notes
1 Construction noise projected from center of Project site to nearest adjacent use (structure)
2 Concrete pours with cement pump trucks and mixers occur during the building construction phase at nighttime only.

As shown in **Table 5.6-K**. daytime and nightime maximum noise levels from construction activities have the potential to reach up to approximately 93 dBA L_{max} which exceeds the maximum allowable noise level of 80 dBA L_{max} in residential zones, per Perris Municipal Code Section 7.34.060.

The Project site is not within a residential zone and there are no residential uses near the Project site. Further, with the exception of concrete pouring activities, construction equipment is expected to operate on the Project site during the days and time periods set forth in Perris Municipal Code Section 7.34.060. In the event on-site concrete pouring activities need to occur at night to allow the concrete to set properly, pours would typically start at 1:00 a.m., which would be outside of the hours permitted by Perris Municipal Code Section 4.34.060. Accordingly, the Project Applicant would be required to obtain authorization from the City. However, construction noise is temporary, and as required by the PVCCSP EIR, PVCCSP EIR mitigation measure **MM Noise 1** would be implemented which requires construction equipment to be equipped with mufflers.

As stated above, the Project is not located within a residential zone, there are no residential uses near the Project site, and the Project Applicant would obtain authorization for nighttime construction: therefore, with the implementation of Project specific mitigation measure **MM NOI 1,** noise emitted from construction activities would be consistent with the Perris Municipal Code, and impacts **would be less than significant with mitigation**.

Project-Generated Traffic Noise Impacts

As discussed in *Section 5.6.1, Setting*, above, it is widely accepted that the average healthy ear can barely perceive changes of 3 dBA; that a change of 5 dBA is readily perceptible; and that an increase (decrease) of 10 dBA sounds twice (half) as loud. A doubling of the energy of a noise source, such as a doubled traffic volume, would increase the noise level by 3 dBA. Therefore, Project-generated trips would need to result in a doubling of the traffic volumes on a road segment in order to result in an audible increase in ambient noise levels.

To determine the Project's contribution to traffic noise on area roadways, CNEL noise levels were calculated 70 feet from the centerline of each roadway analyzed as those which could be affected by implementation of the Project, for the following scenarios. (ENTECH, p. 27.):

- Existing without Project (2024): This scenario refers to the existing present-day noise conditions, without the proposed Project
- Existing with Project: This scenario refers to the existing present-day noise conditions, with the proposed Project.
- Opening Year with Project (2025): This scenario refers to the existing present-day noise conditions, plus ambient growth with the proposed Project.
- Opening Year with Project Plus Cumulative Projects (2025): This scenario refers to the existing present-day noise conditions, plus ambient growth plus cumulative projects in the area with the proposed Project.

Noise contours were used to assess the Project's incremental traffic-related noise impacts at land uses adjacent to roadways conveying Project traffic based on the PVCCSP EIR significance criteria. The noise contours represent the distance to noise levels of a constant value and are measured from 70 feet from the center of the roadway for the 70, 65, 60, and 55 CNEL dBA noise levels. (ENTECH, pp. 27-28.) The noise contours do not consider the effect of any existing noise barriers or topography that may attenuate ambient noise levels. (ENTECH, p. 27.) Additionally, the noise contours reflect modeling of vehicular noise on area roadways and thus do not reflect noise contributions from the surrounding stationary noise sources.

The modeled noise levels are measured at 70-feet from the centerline of Harley Knox Boulevard and Indian Avenue. Noise levels at distances greater than 70 feet from the centerline would be lower due to attenuation provided by increased distance from the noise source. Generally, noise from heavily traveled roadways would experience a decrease of approximately 3 dBA for every doubling of distance from the roadway.

As shown in **Table 5.6-L – Change in Existing Noise Levels at Road Segments as a Result of Project**, below, the Existing without Project exterior noise level is calculated at 81.0 dBA CNEL along Harley Knox Boulevard and 78.0 dBA CNEL along Indian Avenue, without accounting for noise attenuation features such as noise barriers or topography. This would result in a 0.1 dBA and 0.2 dBA

increase between existing without Project and existing exterior noise levels along Harley Knox and Indian Avenue, respectively. The Opening Year with Project condition exterior level is modeled to be 81.3 dBA CNEL along Harley Knox Boulevard and 78.6 dBA CNEL along Indian Avenue, without accounting for noise attenuation features such as noise barriers or topography. This would result in a 0.1 dBA and 0.2 dBA increase between Opening Year with Project and Opening Year with Project and Cumulative Project exterior noise levels along Harley Knox and Indian Avenue, respectively.

Table 5.6-L – Change in Existing Noise Levels at Road Segments as a Result of Project

CNEL at 60 Feet dBA[2]					
Roadway[1]	**Segment**	**Existing Without Project**	**Existing With Project**	**Change in Noise Level**	**Potential Significant Impact**
Existing					
Harley Knox Boulevard	West of Indian Avenue	81.0	81.1	0.1	No
Indian Avenue	North of Harley Knox Boulevard	78.0	78.2	0.2	No
Opening Year					
Harley Knox Boulevard	West of Indian Avenue	81.3	81.4	0.1	No
Indian Avenue	North of Harley Knox Boulevard	78.6	78.8	0.2	No

Source: ENTECH, Table 3.
Notes:
1 Exterior noise level calculated at 5 feet above ground level.
2 Noise levels were calculated from centerline of the subject roadways.

In general, a change in sound levels of 1 dBA cannot be perceived. (ENTECH, p. 12.) As shown in **Table 5.6-L**, Project -generated traffic is expected to increase noise levels by up to 0.2 dBA. Therefore, the increase in CNEL noise levels will be non-perceptible. Thus, noise resulting from Project-generated traffic would have a **less than significant impact** and no mitigation is required.

Operational Noise

Development of the proposed Project will result in changes to existing noise levels on the Project site by introducing new stationary sources of noise, including HVAC equipment, vehicle parking lot, truck idling, and truck loading dock activities into the Project area. (ENTECH, p. 29.) Although there are no noise - sensitive uses near the Project site, the Project's new noise sources may affect nearby industrial receptors. Noise levels from the SoundPLAN model were used to describe the anticipated operational noise levels generated from on-site operational activities. Sound Plan modeling inputs/outputs and equipment reference data are located in Appendix C of the Noise Impact Study.

Table 5.6-M – Daytime Operational Noise Level (dBA L_{max}) shows that the Project -only operational noise levels at receptors R1 through R4 range from 44 to 50 dBA L_{max}, below the City's daytime noise limit of 80 dBA L_{max}. The ambient noise level at the Project area is 81 dBA L_{max} which exceeds the City's nighttime limit. The combined Project-only and ambient noise level at receptors R1 through R4 remains at 81 dBA L_{max}, indicating no change (0 dBA) as a result of the Project. Because the Project-only noise levels are lower than ambient, the Project-only noise levels would not increase the ambient and Project-only noise environment. Therefore, the Project would not exceed the City's significance threshold of a 3 dBA increase in noise levels, and daytime operation noise would result in a **less than significant impact**.

Table 5.6-M – Daytime Operational Noise Levels (dBA L_{max})

Receptor[1]	Ambient Noise Level (dBA, L_{max})[2]	Project Noise Level (dBA, L_{max})	Total Combined Noise Level (dBA, L_{max})	City of Perris Daytime Noise Limit (dBA, L_{max})	Change in Noise Level as Result of the Project	Meets City of Perris Noise Limit?[3]
R1	81	45	81	80	0	Yes
R2		44	81		0	Yes
R3		48	81		0	Yes
R4		50	81		0	Yes

Source: ENTECH, Table 4.

Notes:

1. Receptors represent the property boundary around the Project site.
2. The ambient L_{max} selected for this analysis was 81 dBA, which is the quietest L_{max} measures at the Project site.
3. Project Only Noise levels do not exceed the City of Perris daytimme noise limit. Quietest ambient L_{max} exceeds City of Perris daytime noise limit without the Project. The Project-only noise levels do not increase the ambient noise environment.

Table 5.6-M – Nighttime Operational Noise Level (dBA L_{max}) shows that the Project -only operational noise levels at receptors R1 through R4 range from 44 to 50 dBA L_{max}, below the City's nighttime noise limit of 60 dBA L_{max}. The ambient noise level at the Project area is 72 dBA L_{max} which exceeds the City's nighttime limit. The combined Project-only and ambient noise level at receptors R1 through R4 remains at 72 dBA L_{max}, indicating no change (0 dBA) as a result of the Project. Because the Project-only noise levels would be lower than ambient, the Project-only noise levels would not increase the ambient and Project-only noise environment. Therefore, the Project would not exceed the City's significance threshold of a 3 dBA increase in noise levels, and nighttime operation noise would result in a **less than significant impact**.

Table 5.6-N – Nighttime Operational Noise Levels (dBA L_{max})

Receptor[1]	Ambient Noise Level (dBA, L_{max})[2]	Project Noise Level (dBA, L_{max})	Total Combined Noise Level (dBA, L_{max})	City of Perris Nighttime Noise Limit (dBA, L_{max})	Change in Noise Level as Result of the Project	Meets City of Perris Noise Limit?[3]
R1	72	45	72	60	0	Yes
R2		44	72		0	Yes
R3		48	72		0	Yes
R4		50	72		0	Yes

Source: ENTECH, Table 4.

Notes:
1. Receptors represent the property boundary around the Project site.
2. The ambient L_{max} selected for this analysis was 81 dBA, which is the quietest L_{max} measures at the Project site.
3. Project Only Noise levels do not exceed the City of Perris daytimme noise limit. Quietest ambient L_{max} exceeds City of Perris daytime noise limit without the Project. The Project-only noise levels do not increase the ambient noise environment.

Based on the results from **Table 5.6-N** and **Table 5.6-N**, operational noise levels associated with the Project would not exceed the Perris Municipal Code exterior noise level standards of 80 dBA L_{max} daytime and 60 dBA L_{max} nighttime and the City of Perris General Plan 2030 Noise Element Standard of 60 dBA CNEL. Since implementation of the Project would not exceed applicable thresholds, potent ial impacts to operational noise levels would be **less than significant**.

Conclusion: As discussed above, Project-generated operational noise and Project-generated traffic noise would not exceed City noise standards and operational noise levels and traffic noise level impacts would be **less than significant**. During construction, the Project would not exceed the noise standard identified in Perris Municipal Code Section 7.34.060 because the Applicant would obtain required approval for night construction. Nevertheless, Project-specific and applicable PVCCSP EIR mitigation would be implement. Therefore, with the implementation of PVCCSP EIR mitigation measure **MM Noise 1** and Project-specific mitigation measure **NOI 1** would further reduce potential impacts, and construction noise impacts would be **the less than significant with mitigation**.

Threshold B: *Would the Project result in generation of excessive ground-borne vibration or ground-borne noise levels?*

As indicated above, the City of Perris does not define the numeric level at which a development project's vibration levels are considered "excessive." The City of Perris uses the FTA's vibration damage criteria outlined in **Table 5.6-I** to evaluate potential building damage. Buildings that are concrete engineered/ masonry with no plaster can withstand vibration of up to 0.3 PPV in/sec. The PVCCSP EIR used the FTA vibration threshold of 80 VdB as the maximum acceptable vibration standard for a human response. (PVCCSP EIR, pp. 4.9-27–4.9-28.)

Construction Vibration

Vibration levels associated with construction of the Project were estimated based on the equipment requirements and construction schedule information provided by the Project Applicant, the length of time the Project would take to complete, and the types of construction activities that would occur. As indicated earlier, construction activities would create temporary periods of noise when heavy construction equipment is in operation and would cause a short-term increase in ambient noise levels.

Based on the FTA's reference vibration level, off-road construction equipment causes the greatest source of vibration. Based on **Table 5.6-D – Construction Schedule**, construction is set to occur over an approximately twelve-month period and the primary vibration source during construction activities would be from one bulldozer which would generate vibration levels up to 87 dVB at 25 feet and have the potential to emit peak particle velocity of 0.089 in/sec.

To evaluate potential building damage and to assess human perception to vibration, the FTAs vibration source level of construction equipment and PPV in/sec and VdB formulas, as follows, were used. (FTA 2018, p. 185.):

$$\mathbf{PPV_{equipment} = PPV_{ref} (25/D_{rec})^n}$$

Where: PPV_{ref} = Reference PPV at 25 feet [0.089 in/sec]
D_{rec} = Distance from equipment to receiver [280 feet]
n = 1.5 (the value related to the attenuation rate through ground)

Then: $0.89 * (25/280)^{1.5}$
$= 0.89 * 0.0267$
$= 0.00238$ in/sec

$$\mathbf{VdB_D = VdB_{ref} – 20 \log_{10}(D/D_{ref})}$$

Where: VdB_D = vibration level at distance D
VdB_{ref} = reference level (at 25 feet) [87]
D = Distance from equipment to receiver [280 feet]
D_{ref} = reference distance [25 feet}

Then: $87 – 20 \log_{10} (280/25)$
$= 87- 20.98]$
$= 66.0$ VdB]

The Project construction would not generate excessive ground-borne vibration. Using the PPV and VdB formula for one bulldozer at 280 feet (approximate distance from the edge of Project site to the middle of the Project site), the large bulldozer would generate 0.0237 PPV in/sec and 66.0 Vdb. The vibration that would occur as a result of the Project would not exceed the FTA's vibration damage criteria of 0.3 PPV in/sec or City's maximum acceptable vibration standard for a human response threshold of 80 VdB. Additionally, construction use of off-road equipment at the Project site will be restricted to daytime hours, thereby eliminating potential vibration impacts during sensitive nighttime hours. Therefore, Project construction would have a **less than significant impact**.

Operational Vibration

Vibration associated with operation of the Project would be generated by vehicular traffic and mechanical equipment operation. Per Caltrans' *Transportation and Construction Vibration Manual*, vehicular traffic on roadways rarely generates vibration amplitudes high enough to cause structural or

cosmetic damage. (CALTRANS, Appendix A, p. 10) Therefore, a qualitative analysis was provided to evaluate the likelihood of vibration impacts from the Project.

Caltrans collected vibration data for truck pass-bys, as a result it was concluded that vibration from trucks were considerably higher than that of an automobile. Truck pass-bys are characterized by peaks that, although last considerably longer than automobiles, last no more than a few seconds and often a fraction of a second, indicating a rapid drop-off with distance. (CALTRANS, Appendix A, p. 13.) Vibration wavefronts emanating from several trucks closely together may either cancel or partially cancel (destructive interference) or reinforce or partially reinforce (constructive interference) each other, depending on their phases and frequencies. Since traffic vibrations can be considered random, total destructive or constructive interference probabilities are minimal. (CALTRANS, Appendix A, p. 13.)

Caltrans found that at 5 meters from the centerline of the nearest lane vibrations never exceeded 2.0 mm/s (0.08 in/sec), even with worst combinations of heavy trucks. This amplitude coincides with the maximum recommended "safe amplitude" for historic buildings. Caltrans determined that for most people at 45 meters from the center line vibration, amplitudes would dip below most human perception thresholds. (CALTRANS, Appendix A, p. 14.) According to Caltrans, receptors adjacent to local roadways within 15 meters of the nearest travel lane's center line will have the maximum worse-case vibration levels of 0.08 mm/s or (0.0032 in/sec or 70 VdB). (CALTRANS, Appendix A, p. 11.)

As previously mentioned, the City of Perris uses damage criteria of 0.3 PPV (in/sec) and the human annoyance level of 80 VdB as vibration thresholds. This worst-case vibration level from truck traffic would not exceed the City's adopted level nor the Caltrans threshold of 0.2 PPV (in/sec). Furthermore, it is expected that actual vibration levels within the Project area from truck traffic would be lower than this worst-case level, when soil type and pavement conditions are considered. Therefore, the potential for the Project to result in the exposure of persons to, or generation of, excessive ground-borne vibrations is determined to be below the 80 VdB vibration threshold. Hence, potential impacts from operational vibration would be **less than significant**.

Conclusion: As outlined above, construction and operation activities related to the proposed Project would be considered significant if the construction or operational vibration levels exceeded 0.3 in/sec PPV and/or 80 VdB. Because construction and operation activities related to the proposed Project would not exceed 0.3 in/sec PPV or 80 VdB, potential impacts would be **less than significant.**

Threshold 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 Project site is within Compatibility Zones A, B1-APZ1, B2, and C1 of March ARB/IPA, as shown on **Figure 3.0-7** and discussed above in *Section 5.6.2 - Related Regulations* under the subheading Airport Land Use Commission**.** According to **Figure 5.6-2**, the Project site lies within the 60, 65, and 70 aircraft noise contours. A 24-hour noise measurement conducted at the Project site recorded an ambient noise level of 72 dBA CNEL.

Due to exposure to single-event aircraft noise—especially from closed circuit events—the Project requires interior noise attenuation to meet the City's interior standard of 45 dBA CNEL for office spaces. As stated in Perris Municipal Code Section 16.22.050, standard building construction typically provides 20 dB of noise reduction. (ENTECH, p. 33.)

To achieve compliance, enhanced soundproofing measures such as specialized window glazing would be required to reduce interior noise levels to 45 dBA CNEL or lower, ensuring a suitable indoor environment. Therefore, with the implementation of **MM NOI 2**, potential impacts to the indoor office area would be **less than significant with mitigation.**

5.6.7 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse Impacts. (CEQA Guidelines Section 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse noise impacts. The proposed Project would implement PVCCSP EIR mitigation measure **MM Noise 1** and Project-specific mitigation measure **MM NOI 1** for construction noise and Project-specific mitigation measure **MM NOI 2** for operational airport noise.

MM NOI 1 Construction equipment used during nighttime hours, as defined in Perris Municipal Code Section 7.34.060, shall be equipped with engine mufflers that reduce the equipment noise by 15 dBA or greater to meet the maximum noise construction levels of 80 dBA in residential zones.

MM NOI 2 Prior to the issuance of a building permit, the Project Applicant or contractor shall provide evidence to the City of Perris that an acoustical analysis was conducted by a noise specialist to confirm that the noise insulation proposed in the final building design is sufficient to achieve the City's and ALUCP's noise standards of 45 CNEL for interior office areas. Interior noise attenuation measures may include construction techniques and noise dampening materials such as, but not limited to, specialized window glazing in the office areas of the proposed building.

5.6.8 Summary of Environmental Effects After Mitigation Measures Are Implemented

The proposed Project does not result in any significant operational noise or vibration impacts, or construction vibration impacts and no mitigation is required. Implementation of PVCCSP EIR mitigation measure **MM Noise 1** and Project-specific mitigation measure **MM NOI 1** would reduce the Project's potentially significant temporary construction noise impacts to less than significant levels.

Implementation of Project-specific mitigation measure **MM NOI 2** would require construction techniques and noise dampening materials to reduce interior office space noise levels to 45 CNEL dBA pursuant with the City's and ALUCP's acceptable noise standards. The required interior acoustical level analysis would ensure the Project building's interior office areas noise levels met standards. Therefore, with the implementation of Project-specific mitigation measure **MM NOI 2**, potential aircraft related noise impacts would be reduced to less than significant levels.

5.7 Transportation

The focus of the following discussion is related to the potential impacts associated with conflicts with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, conflict with or inconsistency with CEQA Guidelines Section 15064.3 regarding Vehicle Miles Traveled (VMT), substantially increasing hazards due to geometric design, and inadequate emergency access. Cumulative impacts are discussed in *Section 7.0 – Cumulative Impact Analysis* of this Draft EIR.

The analysis in this section is based on the *DPR 22-00016 First Industrial Logistics at Harley Knox and Indian –VMT Analysis*, dated June 18, 2024 (VMT Analysis) and on the *First Industrial Logistics at Harley Knox and Indian - Traffic Study*, dated June 19, 2024, which are included as Appendix G and H, respectively to this Draft EIR. The VMT Analysis was performed in accordance with the City of Perris Transportation Impact Analysis Guidelines for CEQA (May 2020). In addition to the VMT Analysis and Traffic Study, which are listed below, the following references were used in the preparation of this section of the Draft EIR:

- Albert A. Webb Associates, *First Industrial Logistics at Harley Knox and Indian -Traffic Study,* June 19, 2024. (Included as Appendix H to this Draft EIR) [Cited as Traffic Study]
- City of Perris, *Perris Comprehensive General Plan 2030 - Circulation Element*, adopted June 14, 2005, amended January 11, 2022. (Available at https://www.cityofperris.org/home/showpublisheddocument/447/637806276230830000, accessed June 29, 2025.) [Cited as Perris GP 2030 Circulation Element]
- City of Perris*, Perris Valley Commerce Center Specific Plan Amendment No. 14*, approved October 10, 2023 (Ordinance 1435) (PVCCSP). (Available at City Planning Department.) [Cited as PVCCSP]
- City of Perris, *Perris Valley Commerce Center Specific Plan Final Environmental Impact Report*, State Clearing house # 2009081086, November 2011, certified January 10, 2012. (Available at the City of Perris.) [Cited as PVCCSP EIR]
- City of Perris, *Transportation Impact Analysis Guidelines for CEQA*, May 2020. (Available at https://www.cityofperris.org/Home/ShowDocument?id=13227, accessed June 29, 2025.) [Cited as TIA Guidelines]
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attachments/industrial_warehousing_report_-_revised_2018.pdf, accessed June 29, 2025.) [Cited as SCAG 2018]

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5.7.1 Setting

The Project site encompasses approximately 25.10- gross acres at the northwest corner of Harley Knox Boulevard and Indian Avenue (**Figure 3-2 – Aerial Map),** in the City of Perris. The area surrounding the Project site is dominated by industrial uses, light industrial uses, and vacant land. Specifically, the Project site is bordered by the Perris Valley Storm Drain and City of Moreno Valley (above the Perris Valley Storm Drain) to the north, industrial warehouses to the east and to the south, and vacant land to the west.

Regional and Local Roadway Circulation System

The existing street system in the Project area consists of roadways designated in the City of Perris Comprehensive General Plan 2030 (Perris GP 2030), Circulation Element, Exhibit CE-4: City of Perris Existing Roadway Network, as Freeway, Expressway, Primary Arterial, Secondary Arterial, Major Collector and, Collector (**Figure 5.7-1 –City of Perris General Plan Circulation Element**).

Primary Arterial streets serve major traffic movements or major traffic corridors and Secondary Arterial streets are intended to carry local traffic between the local street system and the primary arterial system. A Collector Street is a low or moderate-capacity road that tends to lead traffic from local roads or sections of neighborhoods to activity areas within communities, arterial roads or occasionally, directly to expressways or freeways. (PVCCSP, pp. 3.0-3 – 3.0-5).The Project area street system generally provides two- to six-lanes of travel. Interstate 215 (the I-215) traverses the City north to south and State Route 74

traverse the City east to west. The I-215 currently has four lanes in each direction and is owned and maintained by Caltrans.

Primary access to the Project site is available through the I-215 Freeway via the Harley Knox Boulevard interchange and the existing roadways within the vicinity of the Project site as described below:

- Harley Knox Boulevard is an east-west six-lane with a raised median roadway designated for 128 foot of right-of-way classified as an Arterial. From Redlands Avenue to I-215, Harley Knox Boulevard is a designated truck route. Harley Knox Boulevard, from Lake Perris Drive to Webster Avenue, is designated as a Class I Shared-Use Path. A Class I Shared-Use Path or Multipurpose Path provides paths completely separated from motor vehicle traffic for use by people walking and biking. (PVCCSP, pp. Section 3.0-2, Section 3.0-4, Section 3.0-6; GP, p. 70.) Currently, Harley Knox Boulevard has a raised median throughout portions of the Project site's frontage. Portions of the northern half of Harley Knox Boulevard are unimproved and do not contain sidewalks, streetlights, gutters, or the Class I Shared-Use Path. Although, not designated, Harley Knox Boulevard's northern half contains a Class II Bikeway (Bike Lanes). Class II Bike Lanes provide one-way bike travel on a street or highway
- Indian Avenue is a north-south four-lane roadway with a raised median-lane roadway with a raised or painted median, designated for 94 foot of right-of-way classified as a Secondary Arterial. From the City's northern limits to Placentia Avenue, Indian Avenue is a designated truck route. (PVCCSP, pp. Section 3.0-5 - Section 3.0-6; GP, p. 70.) Currently, Indian Avenue has a raised median and varies from three lanes at Harley Knox Boulevard to two lanes north of the Project site, where the two northbound lanes merge into a single lane to pass over the existing bridge. Portions of the Project site's frontage is currently unimproved and do not contain sidewalk, or curb and gutter.

Truck Routes

The Perris Valley Commerce Center Specific Plan (PVCCSP) Circulation Plan designates truck routes, as well as provides a Circulation Plan that governs street standards within the Perris Valley Commerce Center (PVCC) area (**Figure 5.7-2 – PVCCSP Circulation Plan and Truck Route**). The PVCCSP-designated truck route map is shown on **Figure 5.7-2**. As shown, Harley Knox Boulevard, Indian Avenue, Redlands Avenue, Morgan Street, and portions of Rider Street, Wester Way, and Placentia Avenue are identified as designated truck routes. It is the City's policy for trucks to utilize the Harley Knox Boulevard interchange at I-215.

Transit Service

The Riverside Transit Agency (RTA) is the Consolidated Transportation Service Agency for western Riverside County and is responsible for coordinating transit services throughout the approximate 2,500 square mile service area, including the Project site. The RTA provides both local and regional services throughout the region with 32 local routes, three CommuterLink express routes, on-demand GoMicro microtransit service and Dial-A-Ride services using 277 vehicles.

The RTA operates eight routes that travel through the City of Perris, and of those eight, two bus routes travel through the PVCC area, Routes 19 and 41 as shown on **Figure 5.7-3 – PVCCSP Mass Transit Circulation**. RTA Route 41 travels along Rider Street and traverses through the PVCC area along portions of the Ramona Expressway, Perris Boulevard, and Rider Street and connects the Mead Valley Community Center to the Riverside County Regional Medical Center in Moreno Valley by traveling through the City of Perris. (PVCCSP, p. 3.0-8.) RTA Route 19 travels through the PVCC area along Perris

Boulevard connecting the Moreno Valley Mall to the City of Perris Civic Center and Downtown. This route includes alternate routing that traverses west on the Ramona Expressway and makes a loop, following Indian Avenue, Morgan Street, Webster Avenue and then back to the Ramona Expressway; this loop provides service to several large employers and a high school. (PVCCSP, p. 3.0-8.)

Transit service is reviewed and updated by RTA periodically to address ridership, budget and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate.

The PVCCSP identified the Perris Valley Rail Line, now called the 91/Perris Valley (91/PV) Line, which was planned as part of Riverside County Transportation Commission's (RCTC) Metrolink system. This passenger train service is now in operation and runs from the Los Angeles Union Station to the South Perris Station on Case Road near the City of Perris/City of Menifee border. The 91/PV Line uses the tracks parallel and west of I-215, west of the Project area. Stops along the 91/PV Line include the Perris-Downtown Station and Moreno Valley/March Field Station. (PVCCSP, p. 3.0-10.)

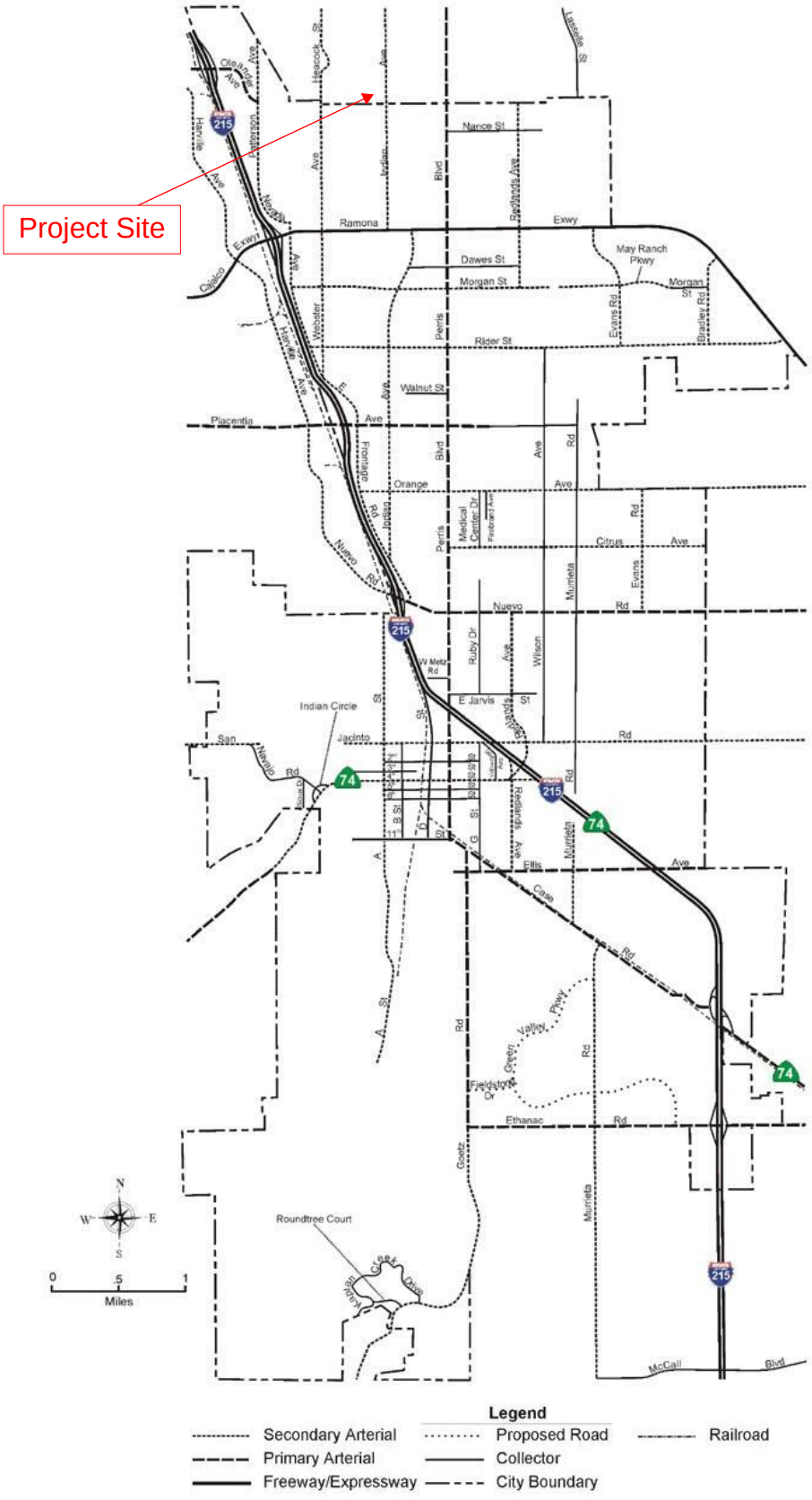
Bicycle and Pedestrian Facilities

In an effort to promote alternative modes of transportation, the City of Perris General Plan 2030 Circulation Element and PVCCSP identify trails and bicycle facilities. **Figure 5.7-4 – City of Perris General Plan Bikeway Systems** depicts the existing and proposed bicycle and walking trails within the City. There are two existing eastbound and westbound Class II bicycle lanes along Harley Knox Boulevard. These bicycle lanes provide dedicated lanes for bicycle travel adjacent to traffic. A painted white line separates the bicycle lane from motor vehicle traffic.

FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 5.7-1

City of Perris General Plan Circulation Element



Source: City of Perris General Plan Circulation Element, 2005.

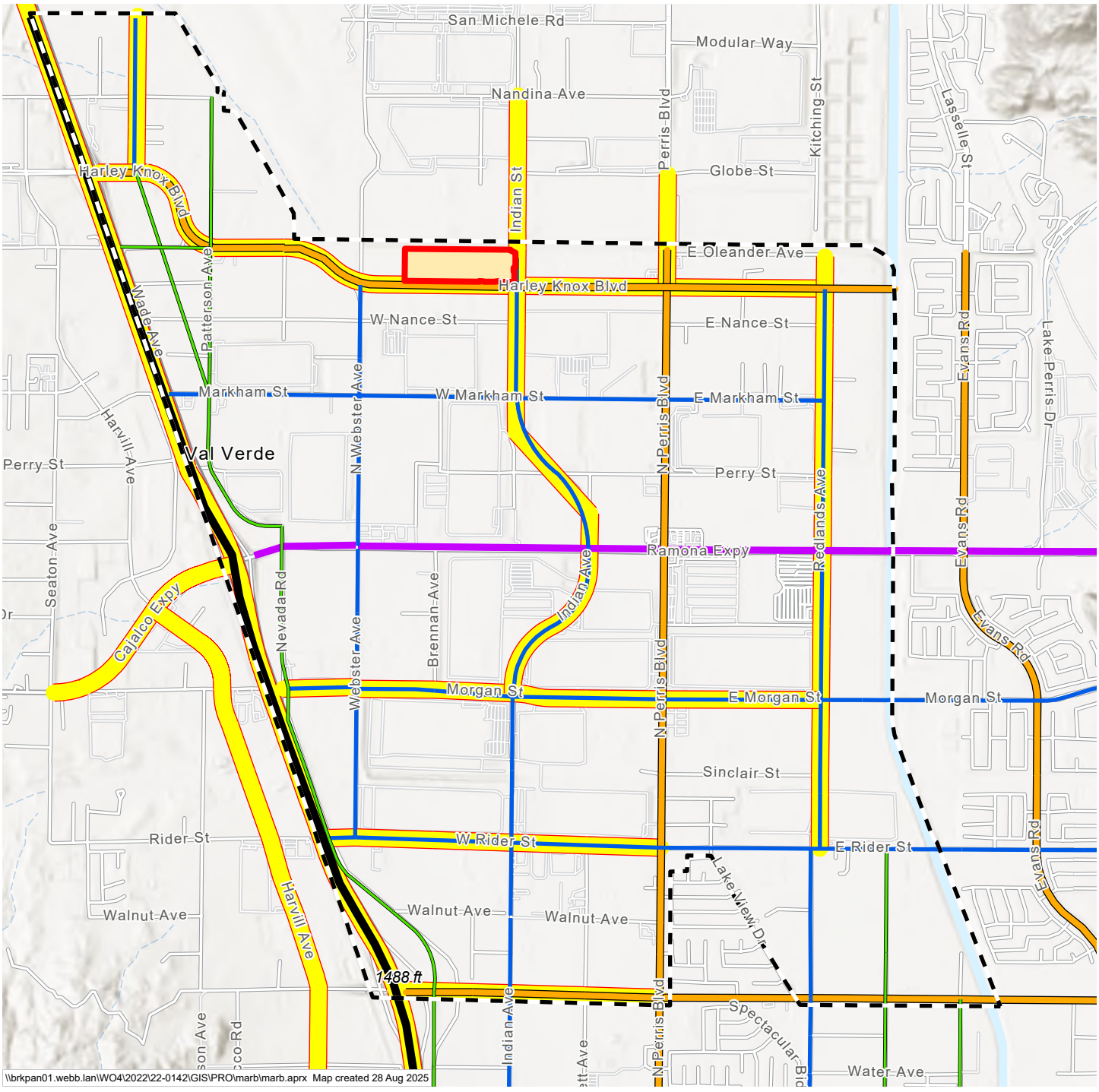
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FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 5.7-2

PVCCSP Circulation Plan and Truck Routes



LEGEND

- Project Boundary
- PVCCSP Boundary
- Truck Routes
- Freeway
- Expressway (184' ROW)
- Primary Arterial (128' ROW)
- Secondary Arterial (94' ROW)
- Collector (66' ROW)

0 1,250 2,500 Ft

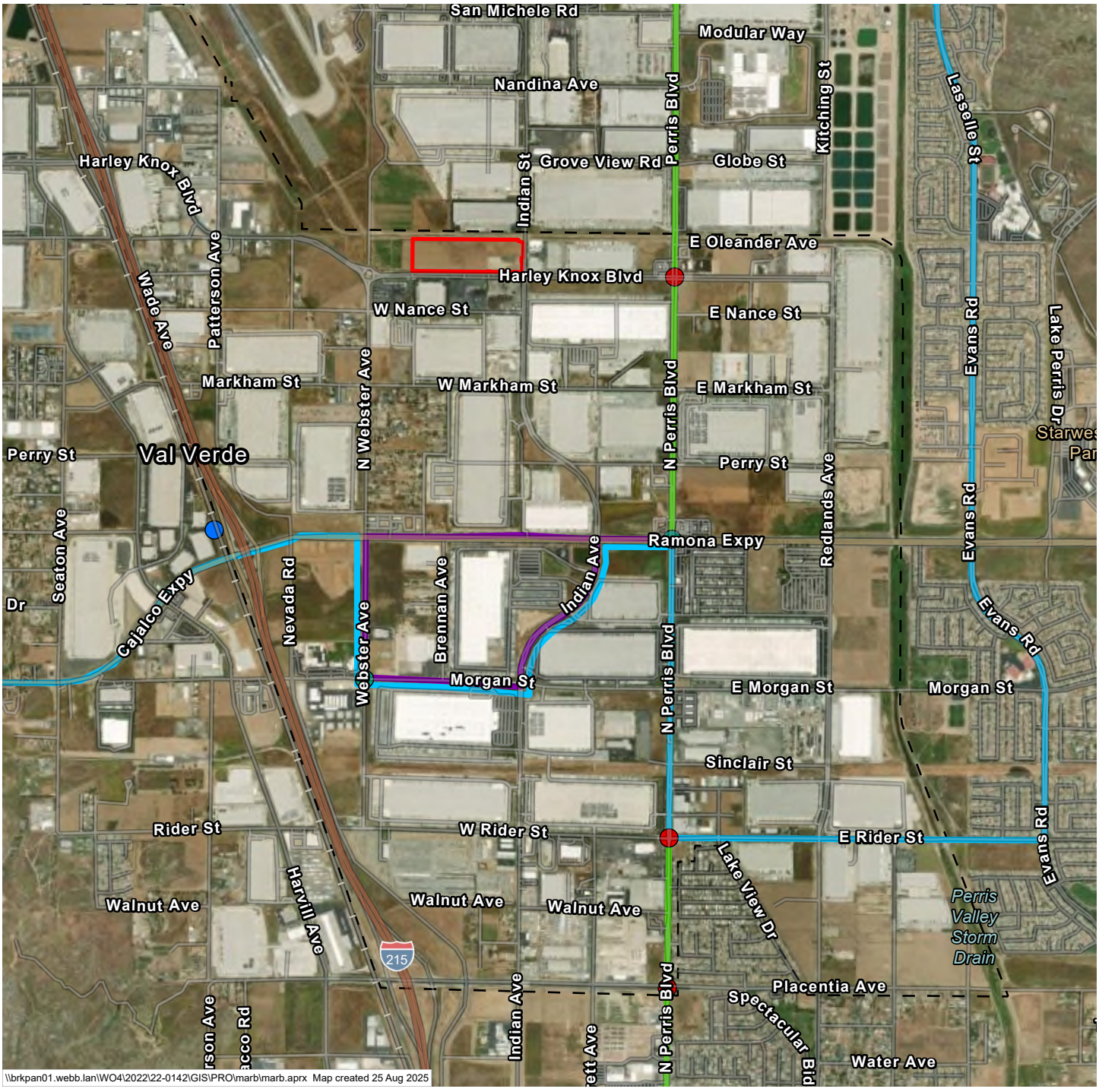
Sources: Perris GP Circulation Element

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FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 5.7-3

PVCCSP Mass Transit Circulation



LEGEND

Project Boundary

PVCCSP Boundary

BUS STOP TYPE

Existing

Metrolink

Transfer

BUS ROUTE

Bus Route 19

Bus Route 19 ALT

Bus Route 41

0 1,250 2,500 Ft

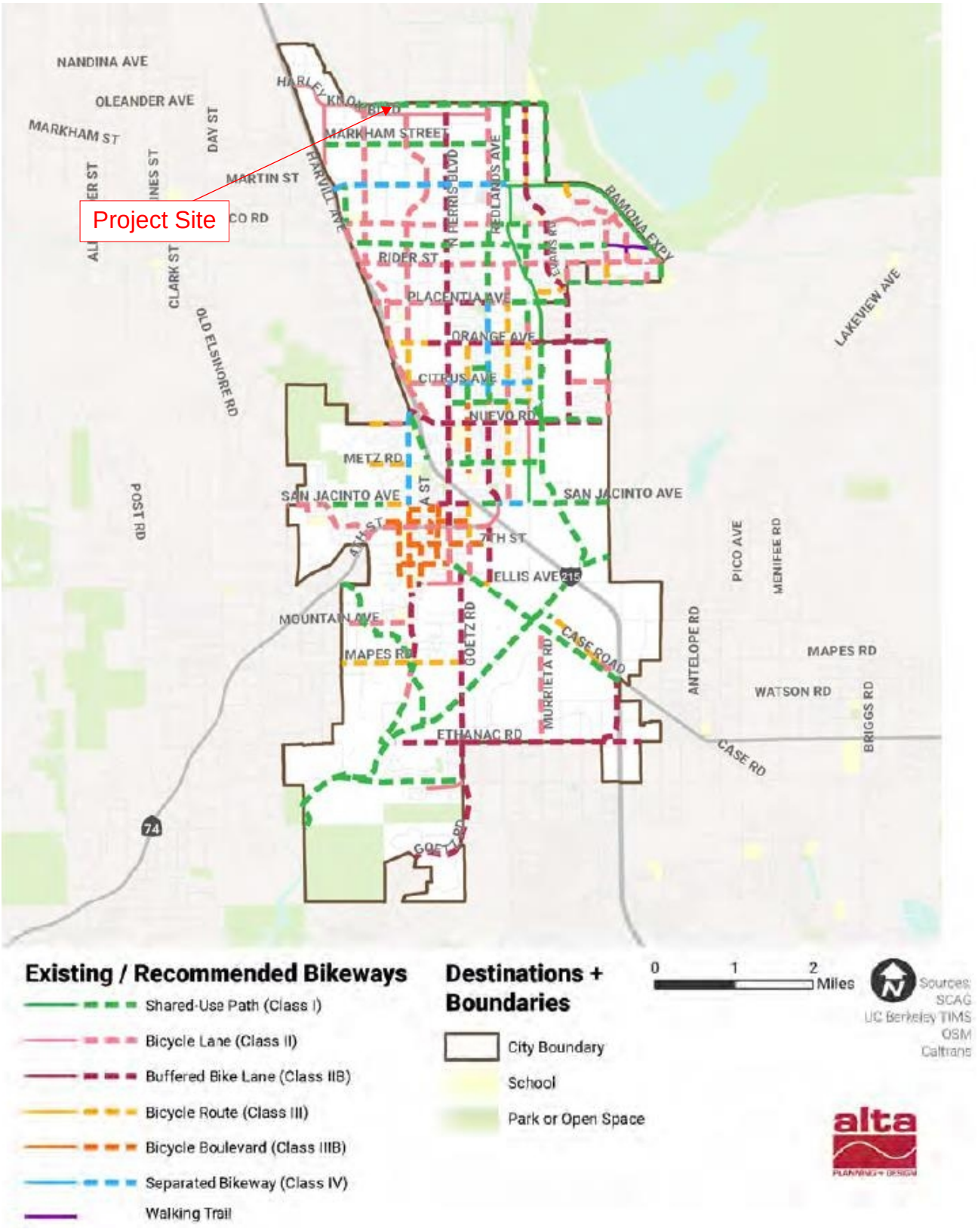
Sources: RTA

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FIRST INDUSTRIAL LOGISTICS AT HARLEY KNOX AND INDIAN

FIGURE 5.7-4

City of Perris General Plan Bikeway Systems



Source: City of Perris General Plan Circulation Element, 2005.

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5.7.2 Related Regulations

Federal Regulations

No federal regulations are applicable to the Project with respect to transportation/traffic.

State Regulations

Senate Bill 743 and VMT Based Analyses

Senate Bill (SB) 743, which was codified in Public Resources Code Section 21099, required changes to the CEQA Guidelines regarding the analysis of transportation impacts. Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." To that end, in developing the criteria, the then Governor's Office of Planning and Research (now the Governor's Office of Land Use and Climate Innovation) proposed, and the California Natural Resources Agency certified and adopted changes to the CEQA Guidelines in December 2018, which entailed changes to the thresholds of significance for the evaluation of impacts to transportation.

The updated CEQA Guidelines include the addition of CEQA Guidelines Section 15064.3, of which Subdivision (b) establishes criteria for evaluating a project's transportation impacts based on project type and using automobile VMT as the metric. Section 15064.3, subdivision (a), states, "For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks (i.e., no heavy-duty trucks). As identified in Section 15064.3(b)(4), a lead agency has the discretion to choose the most appropriate methodology to evaluate a project's VMT. Beginning July 1, 2020, the provisions of State CEQA Guidelines Section 15064.3 applied statewide. Pursuant to SB 743 and Public Resources Code Section 21099, the requirement for analyzing congestion impacts for CEQA purposes was eliminated in December 2018. Therefore, an analysis of congestion impacts, including analysis of impacts related to the Level of Service or LOS of the circulation system is not provided in this Draft EIR.

Regional Regulations

Connect SoCal

As further discussed in *Section 5.5, Land Use and Planning*, of this Draft EIR, the Southern California Association of Governments (SCAG) is a regional agency established pursuant to California Government Code Section 6500, also referred to as the Joint Powers Authority law. SCAG is designated as a Council of Governments, a Regional Transportation Planning Agency, and a Metropolitan Planning Organization. The City of Perris is within SCAG's regional authority.

In April 2018 SCAG published *Industrial Warehousing in the SCAG Region*. According to the document, the SCAG region is a vibrant hub for international and domestic trade because of its large transportation base and extensive multimodal transportation system. The SCAG region's freight transportation system includes warehouses and distribution centers; the Ports of Los Angeles, Long Beach, and Hueneme; airports; rail intermodal terminals; rail lines, and local streets, state highways and interstates. Together the system enables the movement of goods from source to market, facilitating uninterrupted global commerce. The region is home to approximately 34,000 warehouses with 1.17 billion square feet of warehouse building space, and undeveloped land that could accommodate an additional 338 million square feet of new warehouse building space. These regions attract robust logistics activities, and are a major reason why the region is a critical mode in the global supply chain. (SCAG 2018)

On September 3, 2020, SCAG's Regional Council adopted *Connect SoCal - the 2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments*. *Connect SoCal* is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. *Connect SoCal* also recognizes the opportunities and challenges that come with goods movement, and includes a focus on its rapidly changing nature. As with the previous 2016-2040 *Regional Transportation Plan/Sustainable Communities Strategy*, *Connect SoCal* includes a Transportation System Goods Movement Technical Report. (SCAG 2020)

SCAG's Regional Council adopted *Connect SoCal* 2024 - *the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy* on April 4, 2024, and subsequently amended it on September 5, 2024. *Connect SoCal 2024* continues to build upon and expands land use and transportation strategies established over several planning cycles to reduce traffic congestion, improve air quality and improve the region's long-term economic viability through more than $751 billion in transportation investments and a more sustainable regional development pattern. This plan updates existing and includes new strategies for addressing the housing crisis, adapting to climate change, and investing in underserved communities. (SCAG 2024)

South Coast Air Quality Management District Rule 2202

The On-Road Motor Vehicle Mitigation Options, or Rule 2202, is a program designed by the South Coast Air Quality Management District (AQMD) to reduce mobile source emissions generated from employee commutes, to comply with federal and state Clean Air Act requirements, Health & Safety Code Section 40458, and Section 182(d)(1)(B) of the federal Clean Air Act. Rule 2202 offers three programs to employers who employ 250 or more employees on a full or part-time basis at a worksite for a consecutive six-month period. These three programs include: 1. Develop an Employee Commute Reduction Program; 2. Pay fees to the South Coast AQMD in accordance with the Air Quality Investment Program; 3. Purchase mobile source (emissions) credits through California's open marketplace. The Employee Commute Reduction Program, by design, also reduces vehicle miles traveled. An Employee Commute Reduction Program is a program devised by an employer to reduce the number of vehicle trips to its worksite. An Employee Commute Reduction Program incorporates various strategies to encourage alternative commute modes, such as bicycling or walking, riding transit, and carpool/vanpool. The goal of the Employee Commute Reduction Program is to improve or maintain Average Vehicle Ridership. (AQMD-R).

County of Riverside Congestion Management Program

RCTC is designated as the Congestion Management Agency to oversee the Congestion Management Program (CMP). RCTC approved a modification of the CMP Land Use Coordination Element that included the elimination of the Traffic Impact Assessment report process and replaced it with an Enhanced Traffic Monitoring System. Prior to this modification of the CMP, a Traffic Impact Assessment had to be prepared consistent with the CMP/Local Agency Guidelines whenever a proposed development generated greater than 200 peak hour trips. However, as of July 1, 1997, assessing these impacts consistent with the CMP guidelines is no longer required by RCTC.

Western Riverside County Transportation Uniform Mitigation Fee

In 2002, the jurisdictions of western Riverside County, including the City agreed to participate in the Western Riverside County Transportation Uniform Mitigation Fee (TUMF) program. TUMF is a multi-jurisdictional impact fee program administered by the Western Riverside Council of Governments (WRCOG) that funds transportation improvements on a regional and sub-regional basis associated with new growth. All new development in each of the participating jurisdictions is subject to TUMF, based on the proposed intensity and type of development. State law requires the preparation of a "Nexus Study" to establish the relationship between new growth and transportation improvements needed to mitigate traffic impacts. The most recently adopted Nexus Study, the *TUMF Nexus Study – 2024 Update* (TUMF Nexus 2024) was adopted by the WRCOG Executive Committee on September 9, 2024. (TUMF Nexus 2024, p. iv.)

WRCOG is responsible for establishing and updating the TUMF rates. WRCOG receives all fees generated from the TUMF as collected by the local jurisdictions. WRCOG invests, accounts for, and expends the fee in accordance with the TUMF ordinance, the administrative plan and applicable state laws. The TUMF is structured to allocate its funds as follows (TUMF Annual Report 2024, pp. 9-10.):

- Allocation to Regional Transit Improvements - Of the TUMF funds received by WRCOG, 3.13 percent are allocated to the RTA for regional transit improvements.
- Allocation to Regionally Significant Transportation Improvements - Of the TUMF funds received by WRCOG, 45.70 percent are allocated to the RCTC for programming improvements to the arterials of regional significance on the Regional System of Highways and Arterials.
- Allocation to Zones - Of the TUMF funds received by WRCOG, 45.70 percent are allocated to the five Zones for programming improvements to the Regional System of Highways and Arterials as determined by the respective Zone Committees.
- Allocation to Mitigate TUMF Construction Projects – Of the TUMF funds received by WRCOG, 1.47 percent are allocated to the Western Riverside Regional Conservation Authority (RCA) to purchase habitat for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), to mitigate the impacts of TUMF regional transportation projects.
- Allocation for Administrative Purposes - Of the TUMF funds received by WRCOG, 4 percent of are allocated for administrative purposes.

The Regional System of Highways and Arterials is the system of roadways that serve inter-community trips within western Riverside County and therefore are eligible for improvement funding with TUMF funds. The Regional System of Highways and Arterials for western Riverside County was identified based on several transportation network and performance guidelines, including but not limited to (TUMF Nexus 2024, p. 27):

- Arterial highway facilities proposed to have a minimum of four lanes at ultimate build-out (not including freeways;
- Facilities that serve multiple jurisdictions and/or provide connectivity between communities both within and adjoining Western Riverside County:
- Facilities with forecast traffic volumes in excess of 20,000 vehicles per day in the future horizon year;
- Facilities that accommodate regional fixed route transit services;

- Facilities that provide direct access to major commercial, industrial, institutional, recreational, or tourist activity centers, and multi-modal transportation facilities (such as airports, railway terminals, and transit centers).

Specific transportation improvement projects are identified by WRCOG's Public Works Committee, which is responsible for developing objective criteria for project selection and prioritization including, but not limited to, the following factors: traffic safety issues potentially created by growth, regional significance, availability of matching funds, mitigation of congestion created by new development, system continuity, geographic balance, project readiness, and completed projects with reimbursement agreements. Recommendations of the Public Works Committee are then submitted to WRCOG's Technical Advisory Committee, which are then submitted to WRCOG's Executive Committee. The Executive Committee is responsible for reviewing and acting on recommendations for project selection and prioritization of the Regionally Significant Arterials, 10-year Strategic Plan, and the Transportation Improvement Program.

Fees owed to TUMF by project developers is based on the current fees when the certificate of occupancy is issued.

Measure A (Riverside County Half-Cent Sales Tax)
In November 1988, Riverside County voters approved Measure A, a one-half cent increase in sales tax over a 20-year period to be used for transportation purposes. Measure A included a "return to source" concept, which requires the additional sales tax revenue generated in a specific geographic area to be used to finance projects within that same area. In November 2002, Riverside County voters approved a 30-year extension of Measure "A" (2009-2039). Measure A funds go back to each of three geographic areas within Riverside County - Western Riverside County, Coachella Valley, and Palo Verde Valley - in proportion to the sales taxes they contribute. Each of the three geographic areas has its own transportation program. (MA.)

Local Regulations

City of Perris Development Impact Fee Program
In addition to TUMF fees as described above, the City of Perris Development Impact Fee (DIF) is a "fair share" mitigation fee which applies to projects within the City. Applicable projects are required to pay into DIF which will off-set the project's contribution to area-wide traffic impacts. The City of Perris performed a comprehensive review of their DIF program and adopted an update in February 2006. Fee amounts have been determined that will finance transportation infrastructure at levels identified through the year 2030. DIF fees owed by project developers are based on the current fees when the certificate of occupancy is issued.

North Perris Road and Bridge Benefit District
The North Perris Road and Bridge Benefit District (NPRBBD) encompasses approximately 3,500 acres (five square-miles) of land in north Perris. The NPRBBD boundary is the same as that of the PVCCSP.

The purpose of the NPRBBD is to streamline the financing of specific regional road and bridge improvements determined to provide benefit to the developing properties within the boundaries of the NPRBBD. The road and bridge improvement fee for the NPRBBD is a one-time fee paid to the City prior to recordation of a final tract or parcel map or prior to the issuance of a building permit. The payment of the NPRBBD fee is not intended to relieve the subdivider, developer, or an applicant for a building permit

from the requirements imposed under other provisions or ordinances of the City to dedicate and improve roads as a condition of approval of a tentative map or building permit.

The selected facilities are needed to provide acceptable levels of service in conjunction with the planned development of the area. Eligible facilities are those which will provide a regional benefit and are shown in the Circulation Element of the City of Perris General Plan 2030. The NPRBBD includes Expressway, Arterial, and Secondary Arterial classifications of roadway.

Fair Share Contribution

Project mitigation may include a combination of fee payments to established programs (e.g., TUMF, NPRBBD, and/or DIF), construction of specific improvements, payment of a fair share contribution toward future improvements, or a combination of these approaches. Improvements constructed by development may be eligible for a fee credit or reimbursement through the program, where appropriate (to be determined at the City's discretion). When off-site improvements are identified with a minor share of responsibility assigned to proposed development, for improvements not funded through payment of the NPRBBD, the approving jurisdiction may elect to collect a fair share contribution or to require the development to construct improvements. Improvements included in a defined program, i.e., NPRBBD, and constructed by development may be eligible for a fee credit or reimbursement through the program where appropriate.

City of Perris Comprehensive General Plan 2030

The following excerpted goals, policies and measures from the City of Perris Comprehensive General Plan 2030 (Perris GP 2030) Circulation Element, Land Use Element, Safety Element, Environmental Justice Element, and Conservation Element pertain to transportation and are applicable to the proposed Project.

Circulation Element

Goal I	A comprehensive transportation system that will serve projected future travel demand, minimize congestion, achieve the shortest feasible travel times and distances, and address future growth and development in the City.
Policy I.A	Design and develop the transportation system to respond to concentrations of population and employment activities, as designated by the Land Use Element and in accordance with the designated Transportation System, Exhibit 4.2 Future Roadway Network.
Measure I.A.6	Require a parking facility design that minimizes visual and physical impacts while maintaining pedestrian and motorist safety and supporting adjacent activities.
Policy I.B	Support development of a variety of transportation options for major employment and activity centers including direct access to commuter facilities, primary arterial highways, bikeways, park-and-ride facilities, and pedestrian facilities.
Measure I.B.1	Require on-site improvements that accommodate public transit vehicles (i.e., bus pullouts and transit stops and cueing lanes, bus turnarounds and other improvements) at major trip attractions (i.e., community centers, tourist, and employment centers).

Policy I.C:	Cooperate with local, regional, State and federal agencies to establish an efficient multi-modal circulation system.
Policy I.D	Encourage and support the development of projects that facilitate and enhance the use of alternative modes of transportation.
Goal II	A well planned, designed, constructed, and maintained street and highway system that facilitates the movement of vehicles and provides safe and convenient access to surrounding developments.
Measure II.A.I	Utilize existing infrastructure (lanes, median islands, turn lanes, available right-of-way) and rights-of-way to the maximum extent practicable.
Policy II.B	Maintain the existing transportation network while providing for future expansion and improvement based on travel demand, and the development of alternative travel modes.
Measure II.B.I	Develop a Standard Specification for the City of Perris that includes the following: • Cross sections and classifications identified in Exhibit CE-11; • Facilities that accommodate bus operations, including bus turn outs, and other design features; • Design guidelines that define the minimum design and technical criteria for the analysis and design of roadway facilities. Such design guidelines shall identify intersection improvements consistent with the lane geometrics referenced in Table CE-7. • Limit access points and intersections of streets and highways based upon the road's General Plan classification and function to reduce motorist conflict and enhance continual traffic flow. Access points must be located at a sufficient distance from the major intersections and from the access points on the adjoining parcels to allow for safe, efficient operation. • Roadway pavement cross-section to accommodate large trucks where extensive truck travel involving regional movement of bulk goods is anticipated
Measure II.B.2	Allow roundabouts or other innovative design solutions when a thorough traffic impact assessment has been conducted demonstrating that such an intersection design alternative would manage traffic flow and improve safety.
Measure II.B.3	Restrict on-street parking to reduce traffic congestion and improve safety in appropriate locations such as expressways and arterials, and require all new development to provide adequate off-street parking based on expected parking needs.
Goal III	To financially support a transportation system that is adequately maintained.
Policy III.A	Implement a transportation system that accommodates and is integrated with new and existing development and is consistent with financing capabilities.

Measure III.A.I	Distribute the costs of transportation system improvements for new development equitably among beneficiaries through the City's Traffic Impact Fee Program.
Measure III.A.2	Use redevelopment agreements, revenue sharing agreements, tax allocation agreements, and the CEQA process as tools to ensure that new development pays a fair share of the costs to provide local and regional improvements and to mitigate cumulative traffic impacts.
Measure III.A.4	Require developers to be primarily responsible for the improvements of the streets and highways of the commercial, industrial, and residential areas that are being developed. These may include road construction or widening, installation of turning lanes and traffic signals, and the improvement of any drainage facility or other auxiliary facility necessary for the safe and efficient movement of traffic or the protection of road facilities.
Policy IV.A:	Provide non-motorized alternatives for commuter travel as well as recreational opportunities that maximize safety and minimize potential conflicts with pedestrians and motor vehicles.
Goal V	Efficient goods movement.
Policy V.A	Provide for safe movement of goods along the street and highway system.
Measure V.A.3	Monitor commercial truck movements and operations in the City and establish new truck routes away from noise-sensitive areas, where feasible.
Measure V.A.4	Limit truck traffic in residential and commercial areas to designated truck routes; limit construction, delivery, and truck through-traffic to designated routes; and distribute maps of approved truck routes to City traffic officers.
Measure V.A.7:	Require streets abutting properties in Light Industrial and General Industrial zones to conform to standard specifications for industrial collector streets to accommodate the movement of heavy trucks.
Measure V.A.8	Provide adequate off-street loading areas for all commercial and manufacturing land uses.
Goal VII	A transportation system that maintains a high level of environmental quality.
Policy VII.A	Implement the Transportation System in a manner consistent with Federal, State, and local environmental quality standards and regulations.
Measure VII.A.2	Require noise mitigation measures (e.g., wall treatments, landscape berms, and/or building and window enhancements) along freeways, expressways, and four-lane highways in order to protect adjacent noise-sensitive land uses from traffic-generated noise impacts consistent with the requirements of Title 24 of the California Codes and Regulations.
Goal VIII	Enhanced traffic flow, reduced travel delay, reduced reliance on single-occupant vehicles, and improved safety along the City and State roadway system.
Measure VIII.D.I	Implement the City's Transportation Control Measure (TCM) Ordinance to comply with Federal, State, regional, and local requirements.
Measure VIII.D.3	Construct traffic signals at intersections where signal warrants have been met.

Measure VIII.D.4	Optimize traffic operation by maintaining the spacing and operation of the traffic signals, as a coordinated system.

Conservation Element

Goal IX	Encourage project designs that support the use of alternative transportation facilities.
Policy IX.A	Encourage land uses and new development that support alternatives to the single occupant vehicle.
Measure IX.A.1	Encourage installation of shared vehicle parking and support facilities within new and refurbished commercial and industrial developments, i.e., dual fuel vehicles and charging systems on site, car pool parking, and bus stop shelters.
Measure IX.A.2	Install bicycle paths and create secure and accessible bicycle storage for visitors and occupants within new and refurbished commercial and industrial developments.
Measure IX.A.4	Encourage building and site designs that facilitate pedestrian activity, such as locating buildings close to the street and providing direct connections to public walkways and neighboring land uses.
Measure IX.A.5	The City shall require all new public and private development to include bike and walking paths wherever feasible.

Environmental Justice Element

Goal 5.1	Neighborhoods designed to promote safe and accessible connectivity to neighborhood amenities for all residents.
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.
Measure IX.A.1	Encourage installation of shared vehicle parking and support facilities within new and refurbished commercial and industrial developments, i.e., dual fuel vehicles and charging systems on site, car pool parking, and bus stop shelters.

Healthy Community Element

Goal HC-3	Multimodal Transportation – Support efforts to create transportation options beyond an auto-centric focus.
Policy HC 3.1	Promote job growth within Perris to reduce the substantial out-of-Perris job commutes that exist today.
Goal HC-6	Support efforts of local businesses and regional agencies to improve the health of our region’s environment.
Policy HC 6.1	Support regional efforts to improve air quality through energy efficient technology, use of alternative fuels, and land use and transportation planning.

Land Use Element

Policy II.A	Require new development to pay its full, fair-share of the infrastructure costs.

Safety Element

Policy II.A	The City shall require roadway improvements to expedite quick and safe travel by emergency responders.

PVCCSP Standards and Guidelines and PVCCSP EIR Mitigation Measures

The following excerpted guidelines from the PVCCSP Design Standards and Guidelines pertain to transportation and circulation and are applicable to the proposed Project:

- 3.2.2 Truck Circulation: The City has adopted specific truck routes throughout the PVCCSP area to separate passenger and truck traffic and move truck traffic efficiently through the area while avoiding residential communities as much as possible. (See **Figure 5.7-2.**)l
- 4.2.2.2 Vehicular Access and On-Site Circulation:
    - Establish Truck Routes. Truck routes are required for trucks having a maximum gross weight of 5 tons. These routes (Figure 3.0-3 in the PVCC Specific Plan and shown here on Figure 5.7-2) should avoid conflicts with established communities and be separated from passenger vehicles where possible.
    - Minimize Vehicular Conflict. Site access should promote safety, efficiency, convenience, and minimize conflict between employee/customer vehicles and large trucks by creating separate access points when possible.
    - Access Points Easily Identifiable. Entry drives should be easily identifiable through the use of enhanced landscaping and special pavements (accent colors, textures, and patterns). Landscaped medians should be provided on major project entrances. Signage should also be used to identify customer and service entrances. Driveways used exclusively for deliveries or loading activities are excluded.
    - Shared Access. The City encourages shared driveway access whenever possible. Reciprocal ingress/egress access easements shall be provided for circulation and parking to facilitate ease of vehicular movement between properties and to limit the number of vehicular access points to adjoining streets.
    - Emergency Vehicle Access. Design of primary drive aisles must allow for emergency vehicle access. Typically, this requirement is a minimum of 20 feet. However, applicants are encouraged to check with the City's Fire Marshall.
    - Visual Link to Building and Entry. A well-designed entry should offer a visual link to the building and entry through the use of business signs, paving, and landscaping.
    - Primary Entry Drive/Location of Building. The primary entry drive should be oriented toward the main entrance of the building.
    - Entry Median. A landscaped center median shall be provided at the primary entrance for sites requiring 100 or more parking spaces.
    - Landscape Parkways/Sides of Entry. Landscaped parkways shall border both sides of all entry drives to create a sense of arrival.
    - Dual Axle Entrances. Entrances used primarily or solely by dual axle vehicles shall provide a minimum 50-foot radius curb returns.
    - Entry Median. A landscaped center median shall be provided at the primary entrance for sites requiring 100 or more parking spaces.
    - Dual Axle Entrances. Entrances used primarily or solely by dual axle vehicles shall provide a minimum 50' radius curb returns.

- Avoid Back-up onto Public Streets. To avoid back-up onto public streets, entry drive approaches shall avoid conflict points such as parking stalls, internal drive aisles, or pedestrian crossings. Final determination of the driveway approach length shall be determined by the Planning Manager and the City Engineer after consideration of the project site design.
- Minimize Interactions. Minimize interactions between trucks, cars and pedestrians by having separate circulation. The placement of loading areas and dock facilities should minimize the interaction between trucks and visitor/customer automobiles. Access to loading and delivery areas should be separated from parking areas to the greatest extent feasible.
- Consideration of Large Truck Maneuverability. The design and location of loading facilities should take into consideration the specific dimensions required for the maneuvering of large trucks and trailers into and out of loading positions at docks or in stalls and driveways.

- 4.2.2.3 Pedestrian Access and On-Site Circulation:
  - Avoid Conflicts Between Pedestrian and Vehicular Circulation. Provide a system of pedestrian walkways that avoids conflicts with vehicle circulation through the utilization of separated pathways for direct pedestrian access from public rights-of-way and parking areas to building entries and throughout the site with internal pedestrian linkages.
  - Primary Walkway. Primary walkways should be 5 feet wide at a minimum and conform to [Americans with Disabilities Act (ADA)]/Title 24 standards for surfacing, slope, and other requirements.
  - Pedestrian Linkages to Public Realm. A minimum five-foot wide sidewalk or pathway, at or near the primary drive aisle, should be provided as a connecting pedestrian link from the public street to the building(s), as well as to systems of mass transit, and other on-site building(s).
- 4.2.2.4 Parking and Loading
  - Bicycle Racks Facilities. with 200 or more required parking spaces shall provide a bicycle parking area to accommodate no less than 5 locking bicycles. Facilities with 500 or more required parking spaces shall provide bicycle parking to accommodate no less than 15 locking bicycles. Bicycle parking shall be located near main entrances of buildings, adjacent to landscape areas.
  - Motorcycle Parking. Facilities with 200 or more required parking spaces may provide a motorcycle parking area with an overall dimension of 7 feet in length and area not less than 56 square feet. Facilities with 500 or more required parking spaces shall provide a motorcycle parking area with an overall dimension of 7 feet in length and area not less than 70 square feet. For every two motorcycle spaces, credit for one parking space shall be given.
  - ADA Compliant Parking. All parking lots and parking areas shall be ADA compliant.

- 4.2.2.5 Screening
    - Screen Loading Docks. When possible, loading areas should be located on the side or rear of a site and shall be screened from public view.
    - Screening of Outdoor Storage Areas, Work Areas, Etc. The screening of outdoor storage areas, outdoor work areas (where permitted), and mechanical equipment with walls that utilize the same building materials and architectural design of the buildings is required. Soften screen walls with earth berms and dense landscaping. The intent is to keep walls as low and unobtrusive as possible while performing their screening and security functions.
- 5.2.2 Truck Route Standards and Guidelines
    - Large Turning Radius. A 35-foot turning radius shall be provided at intersections along truck route. A minimum 40-foot turning radius shall be required for driveways with 50-feet being the preferred driveway turning radius.
    - Concrete Intersections and Approaches. All major intersections and approaches shall be paved with concrete for a minimum distance of 150 feet on either side of the centerline.
    - Screening of Outdoor Storage Areas, Work Areas, Etc. The screening of outdoor storage areas, outdoor work areas (where permitted), and mechanical equipment with walls that utilize the same building materials and architectural design of the buildings is required. Soften screen walls with earth berms and dense landscaping. The intent is to keep walls as low and unobtrusive as possible while performing their screening and security functions.
- 8.2.1.2 Industrial Site Vehicular/Truck Access and On-Site Circulation:
    - Driveway: Provide for 50-foot turning radii and separate from passenger traffic to the greatest extent possible.
    - Interior Drive Aisles for Trucks: Minimum of 40-feet wide
- 8.2.1.3 Parking and Loading:
    - Parking: Follow City of Perris Ordinance, Chapter 19.69
    - Truck Courts: Automobile Parking is restricted in truck courts
- 8.2.1.5 Screening – Truck Courts:
    - Industrial operations and truck courts shall be screened from public view and adjacent residential uses.

The following mitigation measures from the PVCCSP EIR are applicable to transportation. Applicable mitigation measures incorporated into the proposed Project are identified below and are assumed in the analysis presented in this section.[1]

MM Trans 1 Future implementing development projects shall construct on-site roadway improvements pursuant to the general alignments and right-of-way sections set forth in

[1] **PVCCSP MM Trans 6** is not applicable to the Project, as the Project site is not located adjacent to a Metropolitan Water District Trail.

the PVCC Circulation Plan, except where said improvements have previously been constructed.

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

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

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

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

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

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

5.7.3 Design Considerations

Design considerations refer to ways in which the proposed Project will reduce potential impacts to transportation. The PVCCSP includes Standards and Guidelines relevant to the analysis of transportation impacts summarized below which are incorporated as part of the proposed Project.

As indicated on **Figure 3.0-15 – Grading Plan,** the proposed Project includes the following proposed street improvements along Indian Avenue:

- Construct curb and gutter, sidewalk, and trail parkway along the Project's.
- Modify the existing raised center median to construct center median left turn pocket to access the Project's northerly proposed truck driveway.
- Add one additional southbound travel lane along the Project's frontage.

As indicated on **Figure 3.0-15 – Grading Plan,** the proposed Project includes the following proposed street improvements along Harley Knox Boulevard:

- Construct curb and gutter, sidewalk, and multipurpose path that includes decomposed granite and a bicycle path along the Project's.
- Modify the existing raised center median to construct center median left turn pocket to access the northly proposed truck driveway.
- Add one additional southbound travel lane along the Project's frontage.

As indicated on **Figure 3.0-9 – Site Plan** The proposed Project includes the following onsite circulation improvements:

- The Harley Knox Boulevard driveway is proposed to be restricted to passenger cars only and right turns only (right in and right out). This would be controlled by the existing raised median on Harley Knox Boulevard and appropriate signage at the driveway. (Traffic Study, p. 4.)
- The southerly Indian Avenue driveway is proposed at the approximate location of an existing driveway at the existing corner parcel, approximately 217 feet from the adjacent intersection of Harley Knox Boulevard and Indian Avenue. Access at this driveway is proposed to be restricted to passenger car use only and right turns only, to be controlled by the existing raised median on Indian Avenue and appropriate signage at the driveway. (Traffic Study, p. 4.)
- The northerly Indian Avenue driveway is proposed at the northerly project driveway on Indian Avenue is proposed at the northerly edge of the project site, approximately 458 feet from the adjacent intersection of Harley Knox Boulevard and Indian Avenue. Access at this driveway is proposed to be restricted to truck access only, to be controlled by signage at the driveway, and this driveway would have full access (right in/right out and left in left out). A dedicated northbound left-turn lane is proposed to be provided to separate inbound left turns from northbound through traffic. (Traffic Study, pp. 4, 13.)
- Trucks serving the proposed Project would be required to use Harley Knox Boulevard to travel to and from the Project site. Signage would be posted on-site directing truck drivers to use existing City truck routes on Harley Knox Boulevard. The information on the signage would be coordinated with City Planning and the City's Traffic Engineer during the plan check process.

Pursuant to PVCCSP EIR mitigation measure **MM Trans 4**, above, the RTA was contacted to determine if future provision of bus routing in the Project area would require bus stops at the Project access points.[2] RTA staff indicated no bus stops are required along the Project site's frontage. Pursuant to PVCCSP EIR mitigation measure **MM Trans 7**, a project-level traffic report, *First Industrial Logistics at Harley Knox and Indian -Traffic Study* dated June 19, 2024 (Included as Appendix H to this Draft EIR) was prepared for the proposed Project.

PVCCSP EIR mitigation measures **MM Trans 1**, **MM Trans 2**, **MM Trans 3, MM Trans 5**, and **MM Trans 8** would be applicable to the proposed Project.

5.7.4 Comments Received in Response to the Notice of Preparation

One comment letter was received in response to the Notice of Preparation requesting preparation of a traffic impact analysis. Although not required by CEQA, since VMT is the metric for analysis per State CEQA Guidelines Section 15064.3(b), a traffic study entitled *First Industrial Logistics at Harley Knox and Indian - Traffic Study*, was prepared for the Project and is included as Appendix H of this Draft EIR. The comment letters received are summarized in **Table 2.0 A – Written Comments Received During the Notice of Preparation Comment Period** and included in their entirety in Appendix A of this Draft EIR.

Five verbal comments related to traffic congestion and level of service were also received during the June 18, 2025, Draft EIR public scoping meeting. Per CEQA Guidelines Section 15064.3(b), VMT is the metric for analysis under CEQA, not LOS. Nonetheless, a traffic study entitled *First Industrial Logistics at Harley Knox and Indian - Traffic Study*, was prepared for the Project and is included as Appendix H to this Draft EIR. The verbal comments received are summarized in **Table 2.0-B – Verbal Comments Received During the Draft EIR Scoping Meeting**.

5.7.5 Thresholds of Significance

The City of Perris has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G to the *CEQA Guidelines*.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project would have a less than significant impact in the following areas and these topics are not addressed in this Draft EIR:

- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- Result in inadequate emergency access.

[2] Email communication with RTA staff on July 2, 2025. RTA staff indicated that no bus stop is required at the Project site.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project could have potentially significant impacts in the following areas and these topics are addressed in this Draft EIR:

- Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
- Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

5.7.6 Environmental Impacts Before Mitigation

Threshold A: *Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

Connect SoCal 2024l
SCAG's Connect SoCal 2024 seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. **Table 5.5-B – Proposed Project Consistency with Connect SoCal Goals**, discussed in *Section 5.5 – Land Use and Planning*, of this Draft EIR, addresses the Project's consistency with Connect SoCal. As demonstrated through this analysis, implementation of the Project would be consistent with the goals and policies of SCAG's regional planning program, including the goals related to vehicular and non-vehicular circulation, and goods movement.

Riverside County CMP
The CMP is a component of the RCTC's Long Range Transportation Study, the first countywide long range transportation study that identifies and evaluates highway, major roadway and transit projects throughout the Riverside County region. The Long Range Transportation Study identifies the following roadway improvements within the City of Perris to reduce traffic congestions:

- Ellis Avenue Interchange at I-215;
- Ramona Exchange Interchange at I-215;
- Harley Knox Boulevard Interchange at the I-215;
- Case Road/Mathews Road Interchange at I-215
- Nuevo Road Interchange at I-215
- Ethanac Boulevard Interchange at I-215; and
- Mid County Parkway Project. (LRTS, Appendix A).

The Project would not affect the ability of these improvement projects in the City to be constructed. The Project would ultimately benefit from the above roadway improvement projects as well as the other CMP improvement projects. Hence, the Project would not conflict with implementation of the CMP.

City of Perris

City of Perris Comprehensive General Plan

As presented in *Section 5.5 – Land Use and Planning*, of this Draft EIR, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect, including policies outlined in Perris GP 2030. **Table 5.5-A – Consistency with City of Perris General Plan 2030 Goals and Policies** states the consistency analysis for the City of Perris General Plan 2030 goals and policies that address the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Perris Valley Commerce Center Specific Plan

As identified previously, the PVCCSP includes various Standards and Guidelines for the provision of on-site and off-roadway improvements, vehicular and non-vehicular circulation, and site access. As discussed through the analysis presented in this section, the Project would be developed in accordance with the PVCCSP Standard and Guidelines.

Perris Valley Commerce Center Specific Plan EIR

In compliance with PVCCSP EIR mitigation measure **MM Trans 7,** a *Traffic Impact Analysis* dated June 19, 2024 was prepared for the Project by Albert A. Webb Associates to evaluate the proposed Project's impacts on traffic. Additionally, the proposed Project would participate in the phased construction of offsite traffic signals through payment of the Project's fair share of traffic signal mitigation fees which include TUMF, DIF, and NPRBBD as outlined in PVCCSP EIR mitigation measures **MM Trans 3** and **MM Trans 8**. The fees would be collected and utilized as needed by the City to construct the improvements necessary to maintain the circulation system.

Pursuant to PVCCSP EIR mitigation measures **MM Trans 1** and **MM Trans 2**, and through the development review process, the Project would be constructed with the onsite roadway improvements, right-away sections, and sight distance requirements from the PVCCSP Standards and Guidelines. Pursuant to PVCCSP EIR mitigation measure **MM Trans 4**, the RTA was contacted to determine if future provision of bus routing in the Project area would require bus stops at the Project access points. In an email dated July 2, 2025, RTA staff indicated that a bus stop is not required at the Project site. The PVCCSP also includes pedestrian paths and sidewalks into roadway design, and bike trails into its *Standards and Design Guidelines* to accommodate non-motorized forms of transportation along roadways within the Specific Plan area and to encourage bus stops to be provided at large commercial and employment centers along existing and future bus routes. Bike racks are included in the Project design in compliance with PVCCSP EIR mitigation measure **MM Trans 5**. Compliance with these policies and implementation of PVCCSP EIR mitigation measures **MM Trans 4** and **MM Trans 5** would ensure that the Project will not conflict with the City's adopted policies, plans, or programs supporting alternative modes of transportation.

In summary, the Project would not conflict with regional or local programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities through Project design and implementation of PVCCSP EIR mitigation measures **MM Trans 1, MM Trans 2, MM Trans 3, MM Trans 5,** and **MM Trans 8**. Therefore, potential impacts would be **less than significant with mitigation,** and no new Project specific mitigation is required.

Threshold B: *Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?*

As previously discussed in *Section 5.7.2 – Related Regulations*, SB 743, approved in 2013, changed the way transportation impacts are determined according to CEQA. Updates to the CEQA Guidelines approved in December 2018 included the addition of CEQA Guidelines Section 15064.3, of which Subdivision (a), states, "For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks (i.e., no heavy-duty trucks). Subdivision (b) establishes criteria for evaluating a project's transportation impacts based on project type and using automobile VMT as the metric. 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 or LOS) is no longer considered to be an environmental impact under CEQA. Automobile delay can, however, still be used by agencies to determine local operational impacts.

The City of Perris adopted its *Transportation Impact Analysis Guidelines for CEQA* (TIA Guidelines) in June 2020 which required all discretionary land use projects subject to CEQA to evaluate transportation impacts related to automobile VMT as part of the environmental review process. The first step in evaluating a land use project's VMT impact is to perform an initial screening assessment utilizing the City of Perris VMT Scoping Form for Land Use Projects (hereinafter referred to as VMT Scoping Form). The VMT Scoping Form provides an easy to use tool for streamlining the VMT analysis process. Screening criteria can be used to determine whether a project would be expected to cause a less than significant impact without having to conduct a detailed study. The analysis of this threshold is based on the *VMT Analysis*. which is consistent with the requirements of SB 743 and the City of Perris TIA Guidelines.

The City's TIA Guidelines state that a project may have a less than significant impact and screen out of requiring a "project level" VMT analysis if it meets at least one of the City's VMT screening steps. Consistent with screening thresholds identified in the City TIA Guidelines, the Western Riverside Council of Governments (WRCOG) VMT Screening Tool (Screening Tool) was used to aid in the screening process. According to the City's adopted VMT Screening steps, a project is presumed to have a less than significant impact on VMT if the project satisfies at least one of the following VMT screening criteria:

- **Criteria A. Is the project 100% affordable housing?** If a project consists of 100% affordable housing, then the presumption can be made that it will have a less than significant impact on VMT.
- **Criteria B. Is the project within one half (½) mile of qualifying transit?** CEQA Guideline Section 15064.3, subdivision (b)(1), states that lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within one half (½) mile of an existing major transit stop or an existing stop along a high-quality transit corridor will have a less than significant impact on VMT.
- **Criteria C. Is the project a local serving land use?** Local serving land uses provide more opportunities for residents and employees to shop, dine and obtain services closer to home and work. Local serving uses can also include community resources that may otherwise be located outside of the city or local area. By improving destination proximity, local serving uses lead to shortened trip lengths and reduced VMT. Therefore, local serving uses may be presumed to have a less than significant impact on VMT.

- **Criteria D. Is the Project in a low VMT area?** Projects that locate in areas with low VMT, and that incorporate similar features (i.e., land use type, access to the circulation network, etc.), will tend to exhibit similarly low VMT. If a project is located in a Traffic Analysis Zone (TAZ) with VMT per capita or VMT per employee that is less than or equal to the Citywide average, then the project is considered to be located in a low VMT area and can be presumed to have a less than significant impact on VMT.
- **Criteria E. Are the project's net daily trips less than 500 ADT? P**rojects that generate less than 500 average daily trips (ADT) would not cause a substantial increase in the total citywide or regional VMT and are therefore presumed to have a less than significant impact on VMT.

The proposed Project does not meet Criteria A, because the Project is an industrial development. The Project does not meet Criteria B because the Project site is not located within a half mile of qualifying transit. The Project does not meet Criteria C because the Project, an industrial warehouse, does not qualify as a local serving use. The Project does not meet Criteria D because, based on the City's VMT Screening Tool, the Project site TAZ has a VMT per employee of 12.19 whereas the Citywide VMT per employee is 11.62. Therefore, the Project does not qualify as for this criterion. Further, the Riverside County Model (RIVCOM) screening tool does not include a baseline TAZ VMT for the Project site and, therefore, the Project was not screen-out under this criterion. The Project does not meet Criteria E because the Project's net daily trips are more than 500 ADT. (VMT Analysis, p. 2.)

Because the Project does not meet any of the listed screening criteria above, a VMT Analysis was prepared for the Project as required by the City's TIA Guidelines. City TIA Guidelines identifies RIVCOM as the appropriate tool for conducting VMT analysis for land use projects in the City. RIVCOM was developed by WRCOG and initially released in June 2021. The most current release of RIVCOM is version 4.0.1, released in February 2024, representing the most current sub-regional transportation modeling tool for Western Riverside County. RIVCOM is a useful tool to estimate VMT as it considers interaction between different land uses based on socio-economic data such as population, households, and employment.

If a project is not eligible for VMT screening, a VMT analysis is required. For projects that require RIVTAM/RIVCOM VMT modeling, a project would result in a significant project generated VMT impact under the following conditions (TIA Guidelines, p. 10):

- The base model year project generated VMT per service population exceeds the City of Perris baseline (2018) VMT per service, or
- The future model year project generated VMT per service population exceeds the City of Perris base year VMT per service population.

Consistent with the City TIA Guidelines, VMT was estimated using the Origin/Destination method where the VMT is presented as total VMT and VMT per Service Population. The Origin/Destination method for calculating VMT sums all weekday VMT generated by trips with at least one trip end in the study area (i.e., City boundary or Project boundary) and tracks those trips to their estimated origins/destinations. Origins are all vehicle trips that start in a specific TAZ and destinations are all trips that end in a specific TAZ. The analysis methodology is consistent with the City VMT guidelines. (VMT Analysis, p. 3.)

The City of Perris 2018 baseline per service population was calculated using RIVCOM. (VMT Analysis, p. 3.) As shown in **Table 5.7-A – City of Perris VMT Baseline (2018) Service Population**, the City's total

origin destination VMT per service population subregional VMT is 31.00 miles which will be used as the City Threshold for this analysis.

Table 5.7-A - City of Perris VMT Baseline (2018) Service Population

	Baseline
Service Population	90,351
Population	72,886
Employment	17,465
Origin Destination VMT (Automobile)	2,799,768
Origin Destination VMT / Service Population (Automobile)	**31.00**

Source: VMT Analysis; Table A

As discussed above, the proposed Project did not screen out based on the Scoping Form's screening criteria. Accordingly, pursuant to TIA Guidelines, a VMT Analysis was prepared for the Project by Translutions and is included in Appendix G of this Draft EIR.

The analysis compared the Project-generated VMT per service population to the Citywide VMT per service population under baseline (2018) and future year (2045) conditions. The analysis methodology for the Project was developed consistent with the City VMT guidelines using RIVCOM version 4.0.1 model. Based on the direction from OPR, who developed guidelines for implementing SB743, this analysis only included automobile VMT.

Consistent with City TIA Guidelines, VMT was estimated using the Origin/Destination method where the VMT is presented as total VMT and VMT per Service Population. The results of the VMT analyses are summarized in **Table 5.7–B – Project-Generated VMT**, below.

Table 5.7-B - Project-Generated VMT

	Baseline (2018)		Future Year (2045)	
	City	Project	City	Project
VMT	2,799,768	11,138	4,997,839	10,724
Service Population	90,351	401	165,234	401
VMT/Service Population	31.00	27.80	30.20	26.70

Source: VMT Analysis, Table A

As shown in **Table 5.7-B**, the baseline Project VMT per service population is 27.80 miles. Based on the City thresholds, a project would have a significant VMT impact if the baseline Project-generated VMT per service population exceeds the Citywide VMT per service population of 31.00 miles. Based on the baseline threshold, the Project VMT per service population would be less than the threshold; as such, there would be a less than significant impact to baseline VMT.

Table 5.7-B also shows that year 2045 Project VMT per service population is 26.70 miles. Based on the City thresholds, a project would have a significant VMT impact if the year 2045 Project-generated VMT per service population exceeds the Citywide VMT per service population of 30.20 miles. Based on the

year 2045 threshold, the 2045 Project VMT per service population would be less than the threshold; as such, there would be a less than significant impact to 2045 VMT.

The VMT Analysis demonstrates that the Project's VMT is less than the Citywide VMT. Therefore, impacts with regard to being in conflict with or inconsistent with CEQA Guidelines Section 15064.3(b) would be **less than significant** and no mitigation is required.

5.7.7 Recommended Mitigation Measures

An Environmental Impact Report is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines Section 15126.4). Mitigation measures were evaluated for their ability to reduce or eliminate impacts. As discussed above, the implementation of the proposed Project will be consistent with programs, plans, ordinances or polices addressing a circulation system, will not conflict with CEQA Guidelines Section 15064.3; therefore, Project-specific mitigation is not required. Nonetheless, the proposed Project developer would implement the applicable PVCCSP EIR mitigation measures discussed in *Section 5.7.2*, which include PVCCSP EIR mitigation measures **MM Trans 1** through **MM Trans 5**, **MM Trans 7**, and **MM Trans 8**.

5.7.8 Summary of Environmental Effects After Mitigation Measures Are Implemented

PVCCSP EIR mitigation measure **MM Trans 1** would ensure that Project truck traffic is limited to Harley Knox Boulevard to remain consistent with the City of Perris General Plan 2030 Circulation Element and PVCCSP Circulation Plan. PVCCSP EIR mitigation measure **MM Trans 2** would ensure that trucks and passenger vehicles traveling to and from the Project site have adequate sight distance and safe operational movement at each driveway entering roadway would occur.

The proposed Project applicant (or subsequent developer) would also be subject to its fair share of traffic signal mitigation fees and the cost of other off-site improvements through payment of fair share mitigation fees which include TUMF, DIF, and NPRBBD fees as outlined in PVCCSP EIR mitigation measures **MM Trans 3** and **MM Trans 8**. These fees would be used to construct the improvements necessary to maintain the circulation system.

In compliance with PVCCSP EIR mitigation measures **MM Trans 4** and **MM Trans 7**, the RTA has been contacted and a Project-specific Traffic Study was prepared.

PVCCSP EIR mitigation measure **MM Trans 5** would ensure that the Project site installs the required bike racks in accordance with City's standards.

Therefore, with implementation of the PVCCSP EIR mitigation measures **MM Trans 1, MM Trans 2, MM Trans 3, MM Trans 5,** and **MM Trans 8**, potential impacts to transportation would be **less than significant**.

6.0 Other CEQA Topics

The CEQA Guidelines set forth several general content requirements for EIRs. Those applicable to this Project include unavoidable adverse impacts (Section 15126(b)), growth inducing impacts (Section 15126(d)), and significant irreversible impacts (Section 15126.2(c)). This section addresses each of those general requirements. Cumulative impacts (Section 15130) are discussed in *Section 7.0*.

The following references were used in the preparation of this section of the Draft EIR:

- Employment Development Department, *Labor Force and Unemployment Rate for Cities and Census Designated Places*. (Available at labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html, accessed August 20, 2025.) [Cited as EDD]

6.1 Significant Unavoidable Adverse Impacts

This topic is intended to address any impacts that cannot be mitigated to below a level of significance (CEQA Guidelines Section 15126.2). No significant unavoidable impacts were identified during preparation of this Draft EIR.

6.2 Growth Inducing Impacts

According to CEQA Guidelines Section 15126.2 (d), a project may foster economic or population growth, or additional housing, either indirectly or directly, in a geographical area if it meets any one of the following criteria below:

- A project would remove obstacles to population growth;
- Increases in the population may tax existing community service facilities, causing significant environmental effects; or
- A project would encourage and facilitate other activities that could significantly affect the environment.

Removing Obstacles to Population Growth

As discussed in *Section 3.0 – Project Description* of this Draft EIR, the Project would not directly foster population growth as no residential uses are proposed. The Project site is in an area that is surrounded by existing and proposed development for which regional infrastructure has either already been built or has been approved through adopted master plans. The Project would not remove obstacles to population growth or directly contribute to population growth. The proposed Project involves construction and operation of a single logistics center/high-cube warehouse building in an area that the City has planned for this type of development.

Although the Project includes roadway improvements in the immediate Project vicinity, these improvements have been planned for by the Perris Valley Commerce Center Specific Plan (PVCCSP) and the City of Perris Comprehensive General Plan 2030, and are intended to mitigate additional impacts from operation of not only the proposed Project, but other similar development. Therefore, the Project would not remove barriers to population growth nor would it create growth that would overwhelm or exceed existing services.

Project implementation may indirectly induce population growth in the short term because it would be a new source of employment within the City. However, the extent to which the new jobs created by a project are filled by existing residents is a factor that tends to reduce the growth inducing effect of a project. Construction of the proposed Project would create short-term construction jobs which are anticipated to be filled by workers who, for the most part, reside in the Project area; therefore, construction of the proposed Project would not generate a permanent increase in population within the Project area. The workers constructing the Project are also not expected to require additional housing needs beyond those which are currently available in the City of Perris or the surrounding County areas. Moreover, the Project does not include construction of any new major infrastructure facilities that would remove an obstacle to growth

Increasing in Population that May Tax Existing Community Services

As discussed in *Section 4.0 – Environmental Effects Found Not Significant* of this Draft EIR, the Project itself would not directly impact population growth through the creation of households. Implementation of the proposed Project would result in approximately 542 new jobs to the City plus temporary construction jobs. As of March 2025, the City had an unemployment rate of 5.4 percent or 2,100 unemployed persons. (EDD) Given the nature of the job opportunities and an available labor force, it is expected that any new jobs created by the proposed Project would not result in indirect population growth in the area. In fact, these new employment positions would help fulfill future employment within the immediate Project area. Implementation of the proposed Project would help meet this additional demand for jobs, rather than create a need for additional housing.

Further, because the Project would not increase population, it would have a significant impact upon public services such as police, fire, and schools, as discussed in *Section 4.0 – Environmental Effects Found Not Significant* of this Draft EIR. Police and fire services are based upon response time. The Project would be required to contribute development impact fees which would be used to support these services. Hence, the proposed Project would not increase population so the amount of growth is not significant and is within the rate of growth projected under City of Perris General Plan buildout projections.

Encourage and Facilitate Activities that Significantly Affect the Environment

Given that the Project site is consistent with projected uses under the PVCCSP, the City of Perris General Plan, and, by extension, SCAG, it is not anticipated that the Project's potential to foster economic growth would lead to development not otherwise anticipated by the buildout of the PVCCSP and City of Perris General Plan. Because neither the improvements necessary for development of the site nor the Project itself would facilitate growth that has not been anticipated in the project area, no significant growth-inducing effect would occur. Thus, the Project would not encourage and facilitate activities that significantly affect the environment.

6.2.1 Short-Term Uses versus Long-Term Productivity

The long-term effect of the proposed Project would be to convert the currently vacant and underutilized site into a high-cube warehouse/distribution facility. Consequently, the characteristics of the physical, biological, cultural, aesthetic, and human environment would be impacted, as with any form of urbanization. The consequences of this urbanization include: incremental degradation of the regional air quality, incremental demands for public services and utilities, increased storm water runoff and increased natural resource consumption. However, these impacts would not be substantially different from those identified and planned for in the City of Perris General Plan 2030 and the PVCCSP.

Ultimate development of the Project would create long-term environmental consequences that are connected with any form of urbanization. However, the proposed Project has been designed to provide increased opportunities for employment in closer proximity to residential development and would ultimately provide for a form of long-term productivity which appears compatible with human needs in the area.

6.3 Significant Irreversible Impacts

Pursuant to CEQA Guidelines Section 15126.2(c), an EIR must include a description of significant irreversible environmental changes that would be caused by the proposed action. Section 15126.2(c) reads as follows:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

An impact could fit into this category if:

- The project would involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of the project would generally commit future generations of people to similar uses;
- The project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project; and/or,
- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether the proposed Project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. Although the Project site is currently vacant, the City of Perris General Plan 2030 and PVCCSP anticipates that the site would eventually support uses that would generate general industrial jobs and revenue while expanding the availability of goods and services and the proposed Project would permanently alter the site by converting a predominantly vacant parcel to a developed use.

6.3.1 Irreversible Commitment of Resources

Implementation of the proposed Project would irreversibly commit the 25.10-gross-acre vacant and underutilized Project site to industrial uses. Although construction and operation of the proposed warehouse at the Project site would contribute to the incremental depletion of renewable and nonrenewable resources, the proposed Project would be consistent with other existing and planned development in the Project vicinity within the PVCC area.

Construction of the proposed Project would require the use of renewable resources such as lumber and other forest products, which could be expected to be replenished over the lifetime of the Project because sustainably harvested lumber supplies are increased as seedlings mature into trees. As such, the development of the Project would not result in the irreversible commitment of renewable resources. Nevertheless, there would be an incremental increase in the demand for these resources during construction of the Project.

Construction of the Project would also result in the use of non-renewable resources including building materials (e.g., asphalt, petrochemical construction materials, steel, copper and other metals, and sand and gravel) and fossil fuels, including the use of fossil fuels for construction equipment, the transport of construction materials to the Project site and the transportation of construction workers to and from the Project site (e.g., natural gas, gasoline, diesel fuel and other petroleum-based products). These materials and the resources used in their production are available in a finite supply and are generally not retrievable, although some of the materials are recyclable. Construction materials like concrete and asphalt, for example, can be crushed and recycled as road base. None of these materials are considered to be in short supply and are readily available for use in Project construction.

During Project operation, the Project would result in an irretrievable commitment of nonrenewable resources, such as energy resources and fossil fuels. Energy resources including petroleum and natural gas would be consumed during construction and operational phases of new development. Short-term, or construction-related, energy uses would include electricity for lights and construction equipment, and fossil fuels for construction equipment, and the transport of construction materials and workers to and from the Project site. Long-term energy resources would include fuel consumed for the heating and cooling of the building, transportation of people and goods, as well as for lighting and other energy-related needs. Electricity consumption during construction and operation phases would increase the consumption of oil, coal, and natural gas used at power plants located outside the City of Perris. Accordingly, this represents a long-term commitment to the continued consumption of these resources.

As discussed in *Section 5.3 – Energy, of this Draft EIR*, natural gas, energy, and fuel consumption would not be a significant impact and the Project would not result in wasteful use of these resources. Further, this is a justified consumption of resources because the proposed Project is consistent with the City's planned use at the site and because there are no unique characteristics of the proposed Project that would make this Project operate at a less energy efficient level than other similar developments.

6.3.2 Irreversible Environmental Changes

This Draft EIR found that all potential environmental effects resulting from implementation of the proposed Project would be below the level or significance or can be mitigated to below the level of significance. Therefore, although the Project would result in changes to the existing site conditions, the Project would not cause any significant irreversible environmental changes.

6.3.3 Potential Environmental Damage from Accidents

The Project applicant proposes a high-cube, unrefrigerated warehouse/logistics center; however, potential impacts related to the creation of a significant hazard to the public or environment through the routine transportation, use, or disposal of hazardous materials, and the creation of a significant hazard to the public or environment through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment were found to be less than significant without

mitigation required during preparation of this Draft EIR (*Section 6.9 - Hazards and Hazardous Materials* of the Initial Study). Additionally, potential impacts related to hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or planned school, and safety hazards for people residing or working in the Project area, if within an airport land use plan or within two miles of a private or private-use airport would be reduced to less than significant levels through compliance with regulatory requirements from the City and Riverside County Airport Land Use Commission.

The Project site is located within a seismically active region and would be exposed to ground shaking during a seismic event. In order to address the potential for moderate to severe ground-shaking that may occur during the lifetime of the proposed structures, the Project would follow engineering and design parameters in accordance with the most recent edition of the California Building Code and/or the Structural Engineers Association of California parameters, as required in standard City conditions of approval.

7.0 Cumulative Impact Analysis

7.1 Introduction

CEQA requires that an EIR examine the cumulative impacts associated with a project, in addition to project-specific impacts. The discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone (CEQA Guidelines Section15130(b)).

As stated in the CEQA Guidelines, an EIR "shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable (CEQA Guidelines Section 15130(a)). "Cumulatively considerable" means that "the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects as defined in Section 15130" (CEQA Guidelines Section 15065(c)). CEQA Guidelines Section 15355 states that "cumulative impacts" occur from "…the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time."

A cumulative impact is not considered significant if the impact can be mitigated to below the level of significance through mitigation, including providing improvements and/or contributing funds through fee-payment programs. The EIR must examine "reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project" (CEQA Guidelines Sections 15130(a)(3) and 15130(b)(5)).

CEQA Guidelines Section 15130(b)(1) requires that a discussion of cumulative impacts be based on either a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

CEQA Guidelines Section 15130(d) states that, "Previously approved land use documents such as general plans, specific plans, and local coastal plans may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impact analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or area-wide cumulative impacts of the proposed project have been adequately addressed, as defined in Section 15152(f), in a certified EIR for that plan." Additionally, if a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact (CEQA Guidelines Section 15130(e)).

The "summary of projections method" is primarily utilized as the cumulative impact analysis and is based, in part, on information contained in the Perris Valley Commerce Center Specific Plan Environmental Impact Report, SCH No. 2009081086 (PVCCSP EIR), certified by the City of Perris City Council in 2012. This document is hereby incorporated by reference. A pertinent discussion of

cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiered and program EIRs.

Table 7.0-A – Employment Projections from the Approved PVCCSP, presents the employment projections calculated by applying the square feet per employee factors used in the PVCCSP EIR to the building square footages in the approved PVCCSP.

Table 7.0-A – Employment Projections from the Approved PVCCSP

Development Type	Acres	Employee/SQ. FT. factor[1]	Floor Area Ratio[2]	Building Square Footages	Employment Potentials per Development Ratios
			Typical Allowable	Typical Allowable	Full Buildout of Specific Plan
Business Park/Professional Office	343	600	0.35:1	5,229,378	8,716
Commercial	349	500	0.25:1	3,800,610	7,601
General Industrial	408	1,500	0.45:1	7,997,616	5,332
Light Industrial	1,866	1,030	0.45:1	36,577,332	35,512
Public/Semi-Public Facility[3]	194	n/a	0.50:1	0	0
Other (rights-of-way)[3]	341	n/a	n/a	0	
Residential[4]	82	n/a	n/a	0	
Totals	**3,583**			**49,808,126**	**57,161**

[1] The square feet per employee factor used in the PVCCSP EIR is from page 12 of the County of Riverside General Plan EIR Appendix E Socioeconomic Build-Out Projections Assumptions & Methodology, October 2003.
[2] Floor Area Ratio is the gross building area of all floors divided by the lot area, from City of Perris General Plan June 14, 2005.
[3] Typical building square footage is zero as no buildings will be located in Public or Open Spaces or within rights-of-way.
[4] No employees are projected to be generated from residential land uses. This includes 60 acres of single family residential and 22 acres of multi-family residential.

Table 7.0-B – Traffic Generation Projections for the PVCCSP As Approved, presents the traffic projections for the approved PVCCSP based on the average daily trip generation factors used in the PVCCSP EIR.

Table 7.0-B – Traffic Generation Projections for the PVCCSP As Approved

Development Type	Acres	FAR/Density	Quantity (SF or DUs)	Unit	Daily	
					Rate[1]	Trip Ends
Business Park/Professional Office	343	0.35	5,229,378	TSF	12.76	66,727
Commercial	349	0.25	3.800,610	TSF	42.94	163,198
General Industrial	408	0.45	7,997,616	TSF	3.56	28,472
Light Industrial	1,866	0.45	36,577,332	TSF	6.97	254,944
Public	194	n/a	n/a	n/a	0	0
Other (rights-of-way)	341	n/a	n/a	n/a	0	0
Residential	60	7	420	DU	9.57	4,019
Multi-Family Residential	22	14	308	DU	5.81	1,789
Total	**3,583**					**519,149**

FAR = Floor Area Ratio, SF = Square Feet, TSF = Thousand Square Feet, DU = Dwelling Units.

[1] The average daily trip generation factor used in the PVCCSP EIR is from Trip Generation Manual, 8th Ed., by the Institute of Transportation Engineers, 2008.

The Notice of Preparation for the proposed Project was distributed on May 30, 2025. As of that time, the City had approved 14 amendments to the Perris Valley Commerce Center Specific Plan (PVCCSP), of which nine amendments resulted in changes to land use designations and zoning. Eight of the specific plan amendments/rezonings (PVCCSP Amendment Nos. 3, 4, 6, 7, 8, 9, 11, and 14) changed land use designations/zoning from Commercial (C), Business Park/Professional Office (BPO), and General Industrial (GI) to Light Industrial. PVCCSP Amendment No. 10 resulted in a change in land use designation and zoning from Business Park/Professional Office (BPO) to Commercial (C). The other specific plan amendments amended the PVCCSP Circulation Plan and did not involve any land use changes.

As shown below in **Table 7.0-C – Employment Projections for the PVCCSP through Amendment No. 14**, applying the same density and intensity factors from PVCCSP EIR Table 4-8-E to the land use designations per PVCCSP Amendment No. 14, buildout under the PVCCSP would result in approximately 54.8 million square feet of buildings and 56,839 employees. This represents an approximately 2.2 percent increase (approximately 1.2 million) in projected building square footage and an approximately 1.1 percent (622 employees) decrease in the projected employment from what was evaluated in the PVCCSP EIR.

Table 7.0-C – Employment Projections for the PVCCSP through Amendment No. 14

Development Type	Acres	Employee/SQ. FT. factor[1]	Floor Area Ratio[2]	Building Square Footages	Employment Potentials per Development Ratios
			Typical Allowable	Typical Allowable	Full Buildout of Specific Plan
Business Park/Professional Office	265	600	0.35:1	4,040,190	6,734
Commercial	255	500	0.25:1	2,776,950	5,554
General Industrial	392	1,500	0.45:1	7,683,984	5,123
Light Industrial	2,056	1,030	0.45:1	40,301,712	39,128
Public/Semi-Public Facility[3]	194	n/a	0.50:1	0	0
Other (rights-of-way)[3]	341	n/a	n/a	0	0
Residential[4]	82	n/a	n/a	0	0
Totals	**3,585**			**54,802,836**	**56,539**

[1] The square feet per employee factor used in the PVCCSP EIR is from page 12 of the County of Riverside General Plan EIR Appendix E Socioeconomic Build-Out Projections Assumptions & Methodology, October 2003.
[2] Floor Area Ratio is the gross building area of all floors divided by the lot area, from City of Perris General Plan June 14, 2005.
[3] Typical building square footage is zero as no buildings will be located in Public or Open Spaces or within rights-of-way.
[4] No employees are projected to be generated from residential land uses.

Table 7.0-D – Traffic Generation Projections for the PVCCSP through Amendment No. 14, presents the traffic projections based on the average daily trip generation factor used in the PVCCSP EIR and the PVCCSP land uses through Amendment No. 14. As shown below in **Table 7.0-D**, buildout per PVCCSP Amendment No. 14 would result in approximately 484,861 trip ends. This represents an approximately 6.6 percent decrease, approximately 34,288 fewer trip ends than the approved PVCCSP.

Table 7.0-D – Traffic Generation Projections for the PVCCSP through Amendment No. 14

Development Type	Acres	FAR/Density	Quantity (SF or DUs)	Unit	Daily	
					Rate[1]	Trip Ends
Business Park/Professional Office	265	0.35	4,040,190	TSF	12.76	51,553
Commercial	255	0.25	2,776,950	TSF	42.94	119,242
General Industrial	392	0.45	7,683,984	TSF	3.56	27,355
Light Industrial	2,056	0.45	40,301,712	TSF	6.97	280,903
Public	194	n/a	n/a	n/a	0	0
Other (rights-of-way)	341	n/a	n/a	n/a	0	0
Residential	60	7	420	DU	9.57	4,019
Multi-Family Residential	22	14	308	DU	5.81	1,789
Total	**3,585**					**484,861**

FAR = Floor Area Ratio, SF = Square Feet, TSF = Thousand Square Feet, DU = Dwelling Units.

[1] The average daily trip generation factor used in the PVCCSP EIR is from Trip Generation Manual, 8th Ed., by the Institute of Transportation Engineers, 2008.

Given the relatively small incremental change in both projected building square footage, and employment, and the larger incremental decrease in project trip ends, although the PVCCSP has been amended 14 times, none of these amendments have resulted in changes on the order of magnitude that would change the significance findings of the PVCCSP EIR. Therefore, it is appropriate to use the summary of projections method from the PVCCSP EIR for this cumulative analysis.

7.2 Cumulative Analysis Setting

Because of the nature of individual environmental factors, the cumulative area for every issue addressed in this Draft EIR will not be identical. The individual cumulative areas for the issues addressed in this Draft EIR are provided in the respective impact sections.

7.3 Assessment of Cumulative Impacts

7.3.1 Agriculture/Forestry Resources

The cumulative study area for forestry resources is the County of Riverside. Implementation of the proposed Project would not contribute to a cumulative loss or conversion of forest lands because there are no existing or designated forest lands on the Project site.

The cumulative study area for agricultural resources is also the County of Riverside as these resources are regularly assessed on the countywide level as part of the State's Farmland Mapping and Monitoring Program. Conversion of agricultural lands to non-agricultural uses is a function of population growth, combined with the availability of developable land and the increasing costs of water. With increased urbanization in the City, other impacts affect agricultural productivity. Increased population results in increased urban water use that reduces supplies that would otherwise be available for agricultural use. Increased demand for water increases water costs which, in turn, result in marginal agriculture becoming impractical. (PVCCSP EIR, p. 5.0-2.)

Implementation of the proposed Project would result in the conversation of approximately 21.66 acres of Prime Farmland within the PVCC. As disclosed in the PVCCSP EIR, the conversion of approximately 691.5 acres of Farmland, which includes the Project's 21.66 acres, was previously addressed in the EIR prepared for the 1991 City of Perris General Plan. (PVCCSP EIR, p. 4.1-5.) Thus, the analysis and findings regarding cumulative impacts of the 1991 City of Perris General Plan EIR and the PVCCSP EIR are also applicable to the proposed Project.

The transition of the City into an urban area and conversion of agricultural lands were identified as a goal of the 1991 City of Perris General Plan. The 1991 City of Perris General Plan eliminated agricultural land use designations within the City limits. Accordingly, the EIR prepared in conjunction with the 1991 City of Perris General Plan identified conversion of agricultural land as a significant cumulative impact. Findings and facts indicating that certain social and economic factors outweighed the cumulative impacts associated with conversion of agricultural land to non-agricultural use and a Statement of Overriding Considerations were thereby adopted. (PVCCSP EIR, p. 4.1-5.) Therefore, it can be concluded that Project development would have no new cumulatively considerable impacts with regard to the conversion of Farmland to non-agricultural uses

7.3.2 Air Quality

The cumulative area for air quality impacts is the South Coast Air Basin. As discussed *in Section 5.2* the portion of the South Coast Air Basin within which the City of Perris is located is designated as a non-attainment area for PM-10 under State standards, and for ozone and PM-2.5 under both State and federal standards. Ozone is not directly emitted into the atmosphere; rather, it forms via a reaction of VOC and NO_X in the atmosphere. Therefore, it is also important to consider these emissions and their potential to contribute to ozone pollution in the region even if the region is not in non-attainment for these constituent pollutants. Based on the Air Quality/Greenhouse Gas and Health Risk analyses prepared for the proposed Project (Appendices B, C, and D), the Project's emissions would not exceed applicable thresholds for criteria pollutant emissions or diesel particulate matter emissions.

The South Coast Air Quality Management District (AQMD) considers the thresholds for project-specific impacts and cumulative impacts to be the same. Therefore, projects that exceed project-specific significance thresholds are considered by the South Coast AQMD to be cumulatively considerable. Based on the South Coast AQMD's regulatory jurisdiction over regional air quality, it is reasonable to rely on its thresholds to determine whether there is a cumulative air quality impact. Therefore, because the

proposed Project's emissions would not exceed the applicable South Coast AQMD significance thresholds, the Project would also not have a cumulatively considerable air quality impact.

7.3.3 Energy

Project construction and operations would not result in the inefficient, wasteful or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Future developments within the region would similarly be required to demonstrate that the wasteful, inefficient, or unnecessary consumption of energy would not occur. Additionally, future developments would be subject to the same regulatory requirements as the proposed Project, including compliance with the current Title 24 Building and Energy Efficiency Standards, which would ensure that future development does not result in the wasteful, inefficient, or unnecessary consumption of energy. As such, the Project would not result in a potentially cumulatively-considerable environmental impact due to wasteful, inefficient, or unnecessary consumption of energy. Thus, potential impacts would be less-than-cumulatively considerable.

There are no adopted State or local plans for renewable energy or energy efficiency in the Project area. Further, the proposed Project and future developments would be subject to current California Building Code requirements and must comply with the Building and Energy Efficiency Standards and the California Green Building Standards requirements (and subsequent updates). As such, potential impacts due to a conflict with or obstruction of a State or local plan for renewable energy or energy efficiency would be less-than-cumulatively considerable.

7.3.4 Greenhouse Gas Emissions

Individual projects would incrementally contribute toward the potential for global climate change on a cumulative basis in concert with all other past, present, and probable future projects. While individual projects are unlikely to measurably affect global climate change, each of these projects incrementally contributes toward the potential for global climate change on a cumulative basis, in concert with all other past, present, and probable future projects.

Despite the global nature of greenhouse gas (GHG) impacts, it is important to note that the scope of the City's jurisdictional authority is limited to certain types of emissions generated within the City's physical boundaries. The City's authority does not include the regulation of the majority of actions, including for example, transportation policy, fuel consumption, and energy generation, which the state has determined are necessary to meet all of Assembly Bill 32's greenhouse gas reduction goals. Further, some of the GHG emissions associated with the proposed Project can be reduced only by measures to be implemented by other governmental agencies which are outside the City's jurisdiction. GHG emissions are clearly significant on a global basis and when GHG emissions are outside of the lead agency's jurisdiction and control, consistent with Public Resources Code Section 21081(a)(2), a project has cumulatively considerable significant and unavoidable GHG impacts if other agencies do not take necessary action. These other agencies can and should adopt requirements to ensure cumulative GHG reductions.

As described in *Section 5.4, Greenhouse Gas Emissions*, GHG emission modeling was used to predict the amount of greenhouse gasses the Project would generate during construction and operation. The

total GHG emissions from the Project are below the South Coast AQMD's interim significance threshold level of 10,000 $MTCO_2e$ per year for industrial projects.

Although the proposed Project would emit greenhouse gases, given the global reach of climate change, the emission of greenhouse gases by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of greenhouse gas from more than one project and many sources in the atmosphere that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects on a cumulative basis. The fact that GHG emissions are cumulative was noted by the California Natural Resources Agency in its Public Notice for the SB 97's CEQA amendments regarding GHG. Because the proposed Project's GHG emissions would not exceed the South Coast AQMD's recommended 10,000 $MTCO_2e$ per year screening threshold, the cumulative impact of the proposed Project on GHG emissions would be less than significant.

7.3.5 Land Use

The geographic context for land use is the City of Perris. As with the proposed Project, all development projects within the City are required to comply with applicable local and regional land use plans and policies. Accordingly, a project within the City cannot be approved that is not consistent with the City of Perris General Plan 2030 and Perris Municipal Code unless amendments, variances, or exceptions are proposed and adopted as part of the project. The proposed Project is located within the PVCC area of the City of Perris.

As described in *Section 3.2.1 – Existing General Plan Land Use and Zoning Designation and Section 3.2.2 – Perris Valley Commerce Center Specific Plan*, the proposed Project is consistent with the City's General Plan and PVCCSP land use designations. Additionally, the proposed Project would be consistent with the applicable policies and guidelines of the City of Perris General Plan 2030, PVCCSP, and Connect SoCal. Therefore, the Project's contribution with regard to potential conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect would not be considerable and cumulative impacts in this regard would not be significant.

7.3.6 Noise

As identified in the PVCCSP EIR, the geographic context for the analysis of cumulative noise impacts is the City of Perris. The City of Perris General Plan 2030 EIR concluded that implementation of the City of Perris General Plan 2030 would represent a less than significant impact regarding exposure of people to severe noise levels in excess of established standards or a substantial permanent increase in ambient noise levels. The PVCCSP EIR identified that implementation of land uses within the PVCC area would result in the introduction of new noise sources and levels. Construction crew commutes and the transport of construction equipment and materials to the site for the proposed Project would incrementally increase noise levels on access roads leading to the site; however, this increase would not be perceptible. Secondary sources of noise would include noise generated during excavation, grading, and construction at the Project site.

Noise, by definition, is a localized phenomenon and noise levels rapidly reduce exponentially as distance from the noise source increases. Consequently, only noise resulting from the proposed Project and growth anticipated to occur in the immediate area of the proposed Project site would be likely to contribute to cumulative noise impacts. The Project construction noise impacts on-site and for the off-

site roadway improvements are localized in nature and decrease substantially with distance. Consequently, in order to achieve a substantial cumulative increase in construction noise levels, more than one source emitting high levels of construction noise would need to be in close proximity to a sensitive noise receptor location.

The Project site is not near sensitive noise receptors and the closest receptors to the Project site are industrial uses (see **Figure 5.6-1 – Receptor and Measurement Locations**). As discussed in *Section 5.6 – Noise*, Project-generated construction noise impacts is potentially significant. However, with implementation of PVCCSP EIR mitigation measure **MM Noise 1** and Project- specific mitigation measures **MM NOI 1** and **MM NOI 2**, potential impacts would be less than significant. It is unlikely that there would be construction on any adjacent parcels occurring at the same time as construction on the Project site that would contribute to a cumulatively considerable short-term construction noise impact. Further, each future public and private development project would be required to mitigate construction noise impacts to the extent feasible and to comply with all applicable city, state, and federal standards related to noise. Further, the PVCCSP EIR concluded that the impact of construction of the PVCCSP's implementing development and infrastructure projects would not be cumulatively considerable or significant.

Regarding long-term noise from Project operation, the analysis in *Section 5.6 – Noise*, demonstrates Project-generated operational noise contributions, shown in **Table 5.6-M – Daytime Operational Noise Levels (dBA L_{eq})** and **Table 5.6-N – Nighttime Operational Noise Levels (dBA L_{eq})** would not result in a cumulative increase in noise levels that would exceed the City's established thresholds of significance. As such, the Project's incremental contribution to long-term stationary-sourced noise in the City would not be cumulatively considerable.

Regarding mobile-source noise, the PVCCSP EIR concluded that the cumulative impact of build out of the PVCCSP would have significant noise impacts for 12 roadway segments of the 79 roadway segments studied. The Project site is located along the Indian Avenue between Harley Knox Boulevard and City Boundary segment and along Harley Knox Boulevard between Indian Avenue to Webster Avenue segment, two of the 12 roadway segments identified, and Project traffic is expected to use these two roadway segments. However, as shown in **Table 5.6- L – Change in Existing Noise Levels at Road Segments as a Result of Project** and as discussed in Section 5.6.6, the Project would result in a less than 1 dBA increase in noise. Thus, Project-generated traffic would not result in a substantial noise increase in the proximity of any sensitive receptor or exceed the noise standards of the City of Perris General Plan 2030 or the Perris Municipal Code. Therefore, when taken into consideration along with the future public and private development projects, the Project's contribution to cumulative noise impacts would be less than significant.

With regard to operational noise, each cumulative development project would be responsible for ensuring that City noise standards are not exceeded; therefore, cumulative impacts would be less than significant.

7.3.7 Transportation

Utilizing the summary of projections method, the geographic context for an analysis of transportation impacts considers total buildout of the City of Perris.

Regarding conflicts with programs, plans, ordinances, or policies addressing the circulation system, as described in *Section 3.0 - Project Description*, the Project would be consistent with all applicable

PVCCSP Standards and Guidelines, as discussed in *Section 5.7 - Transportation*. Future development projects would be reviewed for consistency with adopted programs, plans, ordinances, or policies, including but not limited to Connect SoCal 2024, the City of Perris General Plan 2030, and the PVCCSP, as applicable. Even if future public and private development projects are in conflict, the Project would not contribute to a cumulative impact because the Project does not conflict with a program, plan, ordinance, or policy addressing the circulation system.

CEQA Guidelines Section 15064.3 addresses Vehicle Miles Traveled (VMT). As discussed in *Section 5.7 - Transportation*, a VMT Analysis consistent with the requirements of Senate Bill 743 and the City of Perris' *Transportation Impact Analysis Guidelines for CEQA* (TIA Guidelines) was prepared to determine the Project-generated VMT and projected effect on VMT for the following scenarios as presented in **Table 7.0-E – Project-Generated VMT**.

- Base year conditions;
- Base year plus project conditions;
- Future (Horizon) year without project conditions; and
- Future (Horizon) year with project conditions.

Per the City's TIA Guidelines, a project would result in a significant project-generated VMT impact if either of the following conditions are satisfied:

- The base model year Project-generated VMT per service population exceeds the City of Perris baseline VMT per service population, or
- The future model year Project-generated VMT per service population exceeds the City of Perris base year VMT per service population. (TIA Guidelines, p. 10)

When evaluating cumulative VMT impacts, a project that falls below an efficiency-based threshold such as VMT per service population and that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. As such, the Project's cumulative impacts are evaluated based on consistency with the PVCCSP and the findings of the VMT Analysis.

Per the City's TIA Guidelines, modeling was performed for the with and without Project scenarios under baseline (2018) and future year (2045) conditions. Although not required, the analysis included both automobile and truck VMT. The plus Project conditions VMT was derived by adding the Project land use to a separate TAZ and a full base year and year 2045 model run were performed to isolate the VMT for the Project. The Project-generated VMT was extracted from the model using the origin-destination (O/D) trip matrix. (VMT Analysis, p. 2.) The results of the VMT analyses are summarized in **Table 7.0-E.**

Table 7.0-E – Project Generated VMT

	Baseline (2018)		Future Year (2045)	
	City	Project	City	Project
VMT	2,799,768	11,138	4,997,839	10,724
Service Population	90,351	401	165,234	401
VMT/SP	31.00	27.80	30.20	26.70

Source: VMT Analysis, Table A

As shown above in **Table 7.0-E**, and further discussed in detail in *Section 5.7* of this Draft EIR, potential impacts would be less than significant under the baseline and 2045 per service population. Under the baseline condition, the Project's VMT service population (27.80) would be less than the City's VMT service population (31.00). Under the 2045 condition, the Project's VMT service population (26.70) would be less than the City's VMT service population (30.20).

Therefore, since the Project's VMT would be less than the Citywide VMT in both the baseline and future year conditions, Project-specific impacts would be less than significant. Because the Project does not contribute to an increase in City-wide VMT, cumulative impacts with regard to being in conflict with or inconsistent with CEQA Guidelines Section 15064.3(b) would be less than significant.

For the reasons set forth above, the proposed Project's incremental contribution to cumulative traffic impacts would be less than significant.

7.4 Conclusion

The Project and cumulative development projects in the Project vicinity would not result in cumulatively considerable impacts.

8.0 Alternatives to the Proposed Project

The following discussion considers alternatives to implementation of the Project. The discussion examines the potential environmental impacts resulting from each alternative. Through comparisons of these alternatives to the Project, the relative advantage(s) of each can be weighed and analyzed.

CEQA Guidelines Section 15126.6 identifies the parameters within which consideration and discussion of alternatives to the proposed Project should occur. As stated in this section of the CEQA Guidelines, alternatives must focus on those that would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project.

The Initial Study prepared for this Project determined that the following topics to be less than significant or less than significant with mitigation and were therefore, not addressed in this Draft EIR: Aesthetic Resources, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources. Utilities and Service Systems, and Wildfire Hazards. For the purposes of the alternative analysis, the following topics: Agricultural Resources, Air Quality, Energy, Greenhouse Gas Emissions, Land Use, Noise, and Transportation are included in the detailed analysis of the alternatives below to compare to the proposed Project

8.1 Project Objectives

As stated previously in *Section 3.5* of the Draft EIR, the objectives of the proposed Project as identified by the Project applicant are as follows:

- Develop and operate a logistics center on an underutilized site that leverages the existing City infrastructure and is adjacent to similar industrial logistics and distribution center uses.

- Develop and operate a logistics center on an underutilized site that capitalizes the Project site's visibility from I-215 that will attract high-quality tenants and will be competitive with other similar facilities in the region.

- Develop a strategically located logistics center in close proximity to March ARB/IPA, I-215/SR-60, and I-10, to support the distribution of goods throughout the region that limits traffic truck disruption to residential areas within the City and neighboring jurisdictions.

- Enhance regional freight efficiency by positioning the logistics center within proximity to the Ports of Los Angeles and Long Beach, enabling trucks servicing the site to achieve a minimum of two roundtrips per day.

- Design and operate a logistics center that is LEED Certified and meets industry standards for logistics operations and site functionality.

- Support the City's economic growth through capital investment, job creation—including roles for highly skilled workers—and expansion of the local tax base that would further the City's near tern and long-rage fiscal goals.

- Implement the PVCCSP through development of an underutilized site with a land use allowed by the Industrial land use designation and consistent with the PVCCSP development standards and criteria relevant to the site and proposed use.

- Create local job opportunities for residents to improve the City's jobs-housing balance.

- Establish new development that would further the City's near-term and long-range fiscal goals.

8.2 Summary of the Project's Significant Unavoidable Impacts

The analysis in *Section 5.0* determined that are there are no significant unavoidable impacts associated with the implementation of the proposed Project.

8.3 Rationale for Alternative Selection

CEQA Guidelines Section 15126.6(a) requires that an EIR "…describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." According to this section of the CEQA Guidelines "…an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider alternatives which are infeasible. The City, as lead agency, is responsible for selecting a range of Project alternatives for examination, and there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the "rule of reason." (CEQA Guidelines Section 15126.6 (a)) Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to an alternative. (CEQA Guidelines Section 15126.6 (f)(1).)

With respect to the selection of alternatives to be considered in an EIR, CEQA Guidelines Section 15126.6(b) states "…the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." That is, each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed Project.

The rationale for selecting the alternatives to be evaluated, and a discussion of the "no project" alternative are also required. (CEQA Guidelines Section 15126.6(e).) The "no project" alternative in this case, means no development would take place within the Project site limits. The other alternatives evaluated in this Draft EIR were selected based on their ability to reduce to potential impacts to agricultural resources, air quality, energy, greenhouse gas, land use and planning, noise, and transportation as well as respond to comments from the City of Perris Planning Commission during the Draft EIR public scoping meeting.

8.4 Alternatives Rejected from Further Consideration

CEQA Guidelines Section 15126.6(c) specify that an EIR should identify alternatives that were considered by the lead agency but were rejected during the scoping process and identify the reasons for

eliminating the alternatives from further consideration. CEQA Guidelines Section 15126.6(c) further indicates that a lead agency may eliminate an alternative from detailed consideration in an EIR if it fails to meet the basic project objectives, is infeasible, or does not avoid significant environmental impacts. Two such alternatives to the proposed Project were considered and rejected by the City.

8.4.1 Alternative Project Location

Pursuant to CEQA Guidelines Section 15126.6(f)(2), alternate sites should be evaluated, if any feasible sites exist, where significant impacts can be lessened.

This alternative was rejected from further consideration because the Project is consistent with the existing PVCCSP land use designation of General Industrial (GI) for the Project site and there are no site-specific significant and unavoidable impacts that would be lessened if a different site were selected. Moving the proposed Project to another site would still generate a similar level of impacts that can be mitigated and may result in worse air quality, greenhouse gas emissions, and traffic impacts if the alternative site were to be located further from the freeway system. Rather, because the proposed Project site is in close proximity to March Air Reserve Base/Inland Port Airport (March ARB/IPA), the I-215 freeway, and existing warehouse facilities to the south, the potential for an alternative site was rejected from further consideration.

It is required under CEQA that alternative site(s) be evaluated if any feasible sites exist where significant impacts can be lessened. The environmental impacts of development on any other site in the City are expected to be similar to those of the proposed Project. In addition, other sites, depending on their biological or cultural resources may have similar or worse impacts than the Project. Given the nature of the proposed Project, an alternative location would not alleviate the impacts because a relocation of the proposed Project would simply move the potential impacts. Thus, an alternative location may meet most of the basic Project objectives but would not substantially lessen impacts and meet the CEQA definition of an alternative. Therefore, this alternative was not further considered.

8.4.2 No Project/No Development

Under the No Project/No Development alternative, no development would take place within the Project site limits. No ground-disturbing activities would take place, nor would any form of structure be erected. Under the No Project/No Development scenario, the site would remain in existing conditions and the site would not be developed as proposed or for any other use. The No Project/No Development alternative would greatly underutilize the Project site and would not meet any of the Project objectives. Section 15126.6(f)(1) of the CEQA Guidelines states that among the factors that may be considered when addressing the feasibility of alternatives, are site suitability and economic viability. Although in the short-term this alternative may be feasible to allow the site to sit unutilized, over the long-term it is expected that the owners of the site would seek some productive use of this property and that the Project site would therefore be developed in some form. The No Project/No Development alternative is neither suitable for the site nor economically viable. Therefore, this alternative was not further considered.

8.5 Alternatives Evaluated in the Draft EIR

This section of the Draft EIR presents the analysis of one alternative in comparison to the potential environmental effects associated with the proposed Project. In accordance with CEQA Guidelines Section 15126.6(d), the discussion of the environmental effects of the alternatives may be less detailed than the discussion of the potential impacts of the proposed Project. Following a description of the

alternative is a discussion of potential impacts to each of the environmental topics evaluated in this Draft EIR. A comparison of alternatives matrix is presented in *Section 8.6*.

8.5.1 Alternative 1 – Smaller Building Project

Alternative 1 would reduce the overall building size by 35 percent and instead of constructing a 550,000 square-foot warehouse building, would result in the construction of an approximate 357,500-square-foot warehouse building at the Project site. Alternative 1 would still require off-site roadway improvements for both roadways to support the proposed land uses. By reducing the building size by 35 percent, a similar reduction in traffic trips is expected. A 35-percent reduction was chosen as this reduction size would still allow for development but also allows for a reduction in the vehicle trips that would use the site that would also result in a valuable reduction of emissions.

Evaluation of Alternative 1 – Smaller Building Project

Agricultural Resources

Under Alternative 1, the existing site would be developed. This means that the same amount of Farmland would be converted to non-agricultural use under Alternative 1 as the proposed Project. Therefore, because the entire Project site would be disturbed, like the proposed Project, Alternative 1 impacts regarding the conversion of Farmland to non-agricultural uses would be the same those of the proposed Project.

Air Quality

Alternative 1 would develop a building 35 percent smaller than the proposed Project on the Project site. This reduction would also reduce vehicle traffic by roughly 35 percent which in turn reduces air quality emissions by a similar amount. Potential air quality impacts related to construction would be similar to those of the proposed Project and would not exceed South Coast Air Quality Management District (AQMD) thresholds of significance after the implementation of the applicable PVCCSP EIR mitigation measures because the daily construction activities are expected to be similar and the same site acreage would be disturbed. Assuming a 35 percent reduction in overall operation emissions, Alternative 1, like the proposed Project, would be under the South Coast AQMD's thresholds of significance. Localized impacts would also be reduced during construction and operation and, like the proposed Project, would be below the South Coast AQMD's localized significance thresholds. Additionally, health risks associated with diesel exhaust would be reduced compared to the proposed Project because the number of daily truck trips would decrease as a result of the reduced building size, thus decreasing emissions of toxic air contaminants. Therefore, potential air quality impacts under Alternative 1 would be less than the proposed Project.

Energy

Development of Alternative 1 would result in the same disturbance area (site footprint) as the proposed Project. Thus, the one-time construction-related energy consumption as a result from Alternative 1 would be similar to the Project. Alternative 1 would also comply with all California Title 24 Building Standards Codes – Green Building Standard Codes (CALGreen) and California Energy Code), and would also commit to efficient design and material use that are consistent with Leadership in Energy and Environmental Design (LEED) Certification Levels.

Consumption of energy would still occur similar to the proposed Project and would not result in an inefficient use of energy. However, since Alternative 1 would be a reduction in size compared to the proposed Project, the amount of vehicle/equipment use and building-related energy usage would be

less than the proposed Project. Therefore, potential energy impacts would be less than those of the proposed Project. Nonetheless, like the proposed Project, the Alternative 1 would implement concepts of efficient design and material use that are consistent with Silver LEED Certification Levels.

For these reasons, energy consumption under Alternative 1 would be less than the proposed Project.

Greenhouse Gas Emissions
Development of Alternative 1 would result in the same disturbance area (site footprint) as the proposed Project. Thus, the one-time construction-related greenhouse gas (GHG) emissions from Alternative 1 were assumed to be similar to the proposed Project. Alternative 1 would also comply with all present and future regulatory measures developed in accordance with the California Air Resources Board's 2022 Scoping Plan, that would further minimize GHG emissions. Alternative 1 would result in approximately 35 percent fewer vehicle trips than the proposed Project and, with 35 percent less building square footage, would likely generate approximately 35 percent less GHG emissions from building energy use, solid waste, and indoor water demand. The analysis in *Section 5.4*, determined that the proposed Project results in approximately 5,645 metric tons of carbon dioxide equivalents per year ($MTCO_2e$ per year) of total GHG emissions, which would not exceed the South Coast AQMD's applicable 10,000 $MTCO_2e$ per year threshold of significance. Under Alternative 1, a 35 percent reduction of the proposed Project's emissions would result in approximately 3,672 $MTCO_2e$ per year, also under the 10,000 $MTCO_2e$ per year significance threshold. Therefore, potential GHG impacts under Alternative 1 would be less than the proposed Project.

Land Use and Planning
Like the proposed Project, Alternative 1 would result in the development of a vacant site into a warehouse building, a use that is consistent with the PVCCSP and City of Perris General Plan land use designations. Because the use would remain the same under both scenarios, Alternative 1 potential impacts would be similar to those of the proposed Project.

Noise
Alternative 1 would result in construction of the vacant site. Hence, short-term construction noise would remain similar to that of the proposed Project. Ambient noise levels are anticipated to remain similar to the proposed Project. However, as discussed earlier, since Alternative 1 is assumed to have a building that is 35 percent smaller, As vehicular trips contribute to roadway noise, it can be concluded that because Alternative 1 would result in less vehicular trips, it would result in a reduction in roadway noise.

As discussed in *Section 5.6 – Noise*, Project-generated traffic noise would result in an increase in noise levels of approximately 0.1 dBA and 0.2 dBA CNEL on Harley Knox Boulevard and Indian Avenue, respectively, which is not perceptible. In order for a change in noise between the proposed Project and Alternative 1 to be perceptible, trips under Alternative 1 would have to be reduced by at least 50 percent. Since Alternative 1 would not result in that large of a reduction in vehicular trips, potential noise impacts under Alternative 1 would be the similar as the proposed Project.

Transportation
Under Alternative 1, the Project site would be developed with a warehouse building 35 percent smaller which would result in approximately 35 percent fewer vehicle trips than the proposed Project. The proposed Project would generate approximately 763 average daily trips. Alternative 1 would generate approximately 496 average daily trips; 267 fewer total trips than the proposed Project. Trip distribution under Alternative 1 would be similar to that of the proposed Project. Under the City's VMT Guidelines,

this Alternative, which would result in fewer than 500 average daily trips would not cause a substantial increase in the total citywide or regional VMT and are therefore presumed to have a less than significant impact to VMT. Hence, Alternative 1, as with the proposed Project, would result in a less than significant impact as it relates to VMT.

Relationship to Project Objectives

Under Alternative 1, it is assumed that the warehouse building would be 35 percent smaller on the same Project site. **Table 8.0-A –Alternative 1 (Smaller Building Project) Ability to Meet Project Objectives Project** identifies the Project objectives and whether or not Alternative 1 meets each objective.

Table 8.0-A – Alternative 1 (Smaller Building Project) Ability to Meet Project Objectives

Project Objective	Alternative Meets Objective?
Develop and operate a logistics center on an underutilized site that leverages the existing City infrastructure and is adjacent to similar industrial logistics and distribution center uses.	**Yes, but to a lesser degree.** Alternative 1 would provide a logistics facility at the Project, although the site would be utilized to a lesser extent than the proposed Project.
Develop and operate a logistics center on an underutilized site that capitalizes the Project site's visibility from I-215 that will attract high-quality tenants and will be competitive with other similar facilities in the region.	**Yes, but to a lesser degree.** Alternative 1 would provide a logistics facility at the Project, although the site would be utilized to a lesser extent than the proposed Project.
Develop a strategically located logistics center in close proximity to March ARB/IPA, I-215/SR-60, and I-10, to support the distribution of goods throughout the region that limits traffic truck disruption to residential areas within the City and neighboring jurisdictions.	**Yes.** Alternative 1 would operate a logistics center in close proximity to March ARB/IPA, I-215/SR-60, and I-10, to support the distribution of goods throughout the region.
Enhance regional freight efficiency by positioning the logistics center within proximity to the Ports of Los Angeles and Long Beach, enabling trucks servicing the site to achieve a minimum of two roundtrips per day.	**Yes.** Alternative 1 would maximize efficient goods movement because it will locate a logistics center in proximity to the ports.
Design and operate a logistics center that is Silver LEED Certified and meets industry standards for logistics operations and site functionality.	**Yes.** Alternative 1 would develop and operate a logistics center that meets industry standards for operational design criteria.
Support the City's economic growth through capital investment, job creation—including roles for highly skilled workers—and expansion of the local tax base that would further the City's near tern and long-rage fiscal goals.	**Yes, but to a lesser degree.** Alternative 1 would create jobs and expand the City's near tern and long-rage fiscal goals, but to a lesser extent than the proposed Project.
Implement the PVCCSP through development of a land use allowed by the Industrial land use designation and consistent with the development standards and criteria relevant to the site and proposed use.	**Yes.** Alternative 1 would develop a warehouse, an allowable use, consistent with the standards under the PVCCSP.

Project Objective	Alternative Meets Objective?
Provide local employment for residents of the City to improve jobs-housing balance within the City.	**Yes, but to a lesser degree.** Alternative 1 would provide local employment for City residents to improve jobs-housing balance within the City but to a lesser extent than the proposed Project.
Establish new development that would further the City's near-term and long-range fiscal goals.	**Yes, but to a lesser degree.** Alternative 1 would contribute to the economy of the City, but to a lesser extent than the proposed Project.

Alternative 1 Conclusion

CEQA Guidelines Section 15126.6(f)(1) states that among the factors that may be taken into account when addressing the feasibility of alternatives, are site suitability and economic viability; Alternative 1 is neither suitable for the site nor economically viable. As with the proposed Project, all environmental impacts would remain less than significant with Alternative 1. However, this alternative would underutilize the Project site and its contribution to jobs, the City's economic growth, and the City's near- and long-term range fiscal goals would be achieved, but to a lesser extent than the proposed Project. Alternative 1 would meet all of the nine Project Objectives, but to a lesser extent than the proposed Project.

8.5.2 Alternative 2 – Two Smaller Buildings Project

Alternative 2 would reduce the overall Project by constructing two smaller warehouse buildings, each approximately 247,500 square feet in size. This represents a total 10 percent reduction in warehouse building size compared to that of the proposed Project. Construction of the two buildings would be assumed to occur in a single phase beginning with site preparation and grading like the proposed Project. Construction of each building may be staggered which may slightly extend the building construction activities; however, the construction equipment would be similar to the proposed Project. Alternative 2 would still require off-site roadway improvements for both roadways to support the proposed land uses. By constructing two smaller warehouse buildings, this would represent a 10 percent reduction in building size and a similar reduction in traffic trips is expected. The two smaller buildings alternative was chosen in response to comments from the Planning Commission at the Project's Draft EIR scoping meeting.

Evaluation of Alternative 2 – Two Smaller Buildings Project

Agricultural Resources

Under Alternative 2, the existing site would be developed. This means that the same amount of Farmland would be converted to non-agricultural use under Alternative 2 as the proposed Project. Therefore, because the entire Project site would be disturbed, like the proposed Project, then Alternative 2 impacts would be similar to those of the proposed Project.

Air Quality

Alternative 2 would develop two smaller buildings on the Project site, which would lead to a total 10 percent warehouse building reduction compared to the proposed Project. This reduction would also reduce vehicle traffic by roughly 10 percent which in turn would reduce air quality emissions by a similar amount. Potential air quality impacts related to construction would be similar to those of the proposed Project and would not exceed South Coast AQMD thresholds of significance after the implementation

of the applicable PVCCSP EIR mitigation measures because the daily construction activities are expected to be similar and the same site acreage would be disturbed. Assuming a 10 percent reduction in overall operation emissions, Alternative 2, like the proposed Project, would be under the South Coast AQMD's thresholds of significance. Localized impacts would also be reduced during construction and operation and, like the proposed Project, would be below the South Coast AQMD's localized significance thresholds. Additionally, health risks associated with diesel exhaust would be reduced compared to the proposed Project because the number of daily truck trips would decrease as a result of the reduced building size, thus decreasing emissions of toxic air contaminants. Therefore, potential air quality impacts under Alternative 2 would be less than the proposed Project.

Energy

Development of Alternative 2 would result in the same disturbance area (site footprint) as the proposed Project. Thus, the one-time construction-related energy consumption as a result from Alternative 2 would be similar to the Project. Alternative 2 would also comply with all California Title 24 Building Standards Codes – Green Building Standard Codes (CALGreen) and California Energy Code), and would also commit to efficient design and material use that are consistent with Leadership in Energy and Environmental Design (LEED) Certification Levels.

Consumption of energy would still occur similar to the proposed Project and would not result in an inefficient use of energy. However, since Alternative 2 would be a reduction in size compared to the proposed Project, the amount of vehicle/equipment use and building-related energy usage would be less than the proposed Project. Therefore, potential energy impacts would be less than those of the proposed Project. Nonetheless, like the proposed Project, the Alternative 2 would implement concepts of efficient design and material use that are consistent with Silver LEED Certification Levels. For these reasons, energy consumption under Alternative 2 would be less than the proposed Project.

Greenhouse Gas Emissions

Development of Alternative 2 would result in the same disturbance area (site footprint) as the proposed Project. Thus, the one-time construction-related GHG emissions from Alternative 2 were assumed to be the same as the proposed Project. Alternative 2 would also comply with all present and future regulatory measures developed in accordance with 2022 Scoping Plan, that would further minimize GHG emissions. Alternative 2 would result in approximately 10 percent fewer vehicle trips than the proposed Project, and with 10 percent less building square footage, would likely generate approximately 10 percent less GHG emissions from building energy use, solid waste, and indoor water demand. The analysis in *Section 5.4* determined that the proposed Project results in approximately 5,645 $MTCO_2e$ per year of total GHG emissions, which is under the South Coast AQMD's applicable 10,000 $MTCO_2e$ per year threshold of significance. Under Alternative 2, a 10 percent reduction of the proposed Project's emissions would result in approximately 5,084 $MTCO_2e$ per year, also under the 10,000 $MTCO_2e$ per year significance threshold. Therefore, potential GHG impacts under Alternative 2 would be less than the proposed Project.

Land Use and Planning

Like the proposed Project, Alternative 2 would result in the development of a vacant site into a warehouse building, a use that is consistent with the PVCCSP and City of Perris General Plan land use designations. Therefore, because the use would remain the same under both scenarios, Alternative 2 potential impacts would be similar to those of the proposed Project.

Noise

Alternative 2 would result in construction of the vacant site. Hence, short-term construction noise would remain similar to that of the proposed Project. Ambient noise levels are anticipated to remain similar to the proposed Project. However, as discussed earlier, since Alternative 2 is assumed to have a building that is 10 percent smaller, As vehicular trips contribute to roadway noise.

As discussed in *Section 5.6 – Noise*, Project-generated traffic noise would result in an increase in noise levels of approximately 0.1 dBA and 0.2 dBA CNEL on Harley Knox Boulevard and Indian Avenue, respectively, which is not perceptible. In order for a change in noise between the proposed Project and Alternative 2 to be perceptible, trips under Alternative 2 would have to be reduced by at least 50 percent. Since Alternative 2 would not result in that large of a reduction in vehicular trips, potential noise impacts under Alternative 2 would be the similar as the proposed Project.

Transportation

Under Alternative 2, the Project site would be developed with two warehouse buildings totaling 10 percent smaller which would result in approximately 10 percent fewer vehicle trips than the proposed Project. The City's VMT metric for non-residential uses is based on VMT per employee. Alternative 2 would also result in fewer employees than the proposed Project. Because Alternative 2 would reduce both daily vehicle trips and employees, it would be expected to result in similar VMT impacts per employee as the proposed Project, which would not exceed the City's threshold. Therefore, potential VMT impacts under Alternative 2 would be similar to the proposed Project.

Relationship to Project Objectives

Under Alternative 2 it is assumed that the total building size of the two smaller buildings would be 10 percent smaller than the proposed building size under the proposed Project. **Table 8.0-B – Alternative 2 (Two Smaller Buildings Project) Ability to Meet Project Objectives** identifies the Project objectives and whether or not Alternative 2 meets each objective.

Table 8.0-B – Alternative 2 (Two Smaller Buildings Project) Ability to Meet Project Objectives

Project Objective	Alternative Meets Objective?
Develop and operate a logistics center on an underutilized site that leverages the existing City infrastructure and is adjacent to similar industrial logistics and distribution center uses.	**Yes, but to a lesser degree.** Alternative 1 would provide a logistics facility at the Project, although the site would be utilized to a lesser extent than the proposed Project.
Develop and operate a logistics center on an underutilized site that capitalizes the Project site's visibility from I-215 that will attract high-quality tenants and will be competitive with other similar facilities in the region.	**Yes, but to a lesser degree.** Alternative 1 would provide a logistics facility at the Project, although the site would be utilized to a lesser extent than the proposed Project.
Develop a strategically located logistics center in close proximity to March ARB/IPA, I-215/SR-60, and I-10, to support the distribution of goods throughout the region that limits traffic truck disruption to residential areas within the City and neighboring jurisdictions.	**Yes.** Alternative 1 would operate a logistics center in close proximity to a March ARB/IPA, I-215/SR-60, and I-10, to support the distribution of goods throughout the region.

Project Objective	Alternative Meets Objective?
Enhance regional freight efficiency by positioning the logistics center within proximity to the Ports of Los Angeles and Long Beach, enabling trucks servicing the site to achieve a minimum of two roundtrips per day.	**Yes.** Alternative 1 would maximize efficient goods movement because it will locate a logistics center in proximity to the ports.
Design and operate a logistics center that is Silver LEED Certified and meets industry standards for logistics operations and site functionality.	**Yes.** Alternative 1 would develop and operate a logistics center that meets industry standards for operational design criteria.
Support the City's economic growth through capital investment, job creation—including roles for highly skilled workers—and expansion of the local tax base that would further the City's near tern and long-rage fiscal goals.	**Yes, but to a lesser degree.** Alternative 1 would create jobs and expand the City's near tern and long-rage fiscal goals, but to a lesser extent than the proposed Project.
Implement the PVCCSP through development of a land use allowed by the Industrial land use designation and consistent with the development standards and criteria relevant to the site and proposed use.	**Yes.** Alternative 1 would develop a warehouse, an allowable use, consistent with the standards under the PVCCSP.
Provide local employment for residents of the City to improve jobs-housing balance within the City.	**Yes, but to a lesser degree.** Alternative 1 would provide local employment for City residents to improve jobs-housing balance within the City but to a lesser extent than the proposed Project.
Establish new development that would further the City's near-term and long-range fiscal goals.	**Yes, but to a lesser degree.** Alternative 1 would contribute to the economy of the City, but to a lesser extent than the proposed Project.

Alternative 2 Conclusion

CEQA Guidelines Section 15126.6(f)(1) states that among the factors that may be taken into account when addressing the feasibility of alternatives, are site suitability and economic viability; Alternative 2 is neither suitable for the site nor economically viable. While most environmental impacts would be less than significant with Alternative 2, this alternative would underutilize the Project site and its contribution to jobs, the City's economic growth, and the City's near- and long-term range fiscal goals would be achieved, but to a lesser extent than the proposed Project. Therefore, although Alternative 2 would result in lesser impacts than the proposed Project, Alternative 2 would meet all of the nine Project's Objectives, but to a lesser extent than the proposed Project.

8.6 Comparison of Alternatives

Table 8.0-C – Comparison of Alternatives Matrix, below, compares the potential environmental impacts of each alternative and ranks each alternative as having impacts that are increased, similar, or reduced in comparison to the proposed Project.

Table 8.0-C – Comparison of Alternatives Matrix

Environmental Issue	Proposed Project	Alternative 1 Smaller Building	Alternative 2 Two Smaller Buildings
Agricultural Resources	LTS	Similar	Similar
Air Quality	LTSM	Reduced	Reduced
Energy	LTSM	Reduced	Reduced
Greenhouse Gas (GHG) Emissions	LTSM	Reduced	Reduced
Land Use and Planning	LTS	Similar	Similar
Noise	LTSM	Similar	Similar
Transportation	LTS	Similar	Similar
Environmentally Superior		Yes, but to a lesser degree	Yes, but to a lesser degree
Meets Project Objectives		Yes, but to a lesser degree	Yes, but to a lesser degree

LTS = Less than Significant Impact

LTSM = Less than Significant Impact with Mitigation. Mitigation includes Project-specific and/or PVCCSP EIR measures.

SU = Significant and Unavoidable Impact

8.7 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires the identification of the environmentally superior alternative. Alternative 1 (Smaller Building) would be the environmentally superior alternative. Alternative 1's potential impacts to agricultural resources, land use and planning, noise, and transportation would remain similar to those of the proposed Project and the impacts to air quality, energy, and greenhouse gas emissions, would be reduced compared to the proposed Project and reduced to a greater degree than Alternative 2.

Section 9 – References

Pursuant to the provisions of Section 15129 of the CEQA Guidelines, this section includes a listing of all reference materials, the agencies, organizations and persons contacted in preparing the Draft EIR, and a list of preparers.

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