

## City of Menifee

### CADO Menifee Industrial Warehouse Project

#### Perris Appeal Comments and Responses

- A-1** This comment explains that this letter is the City of Perris' appeal letter in objection to the City of Menifee Planning Commission's August 14, 2024 decision approving the Tentative Parcel Map and Plot Plan to permit the construction and operation of the CADO Menifee Industrial Warehouse Project (Project) and the Final Environmental Impact Report (EIR) approved for the Project. This comment does not raise any substantive issues with the Final EIR and therefore no further response is needed. The following responses were prepared to address the substantive comments raised in the rest of the City of Perris' appeal letter. Please refer to Responses to Comments A-2 through A-64.
- A-2** This comment summarizes the Project and does not raise any specific comments regarding the Final EIR. No further response is warranted.
- A-3** This comment is a general description of the Green Valley Specific Plan (GVSP), a master-planned community within the City of Perris. No specific comments concerning the deficiency of the Final EIR were made, and, therefore, no further response is warranted.
- A-4** The City of Perris notes the residential units within the GVSP and the vicinity of the Project site but makes no specific claims on how the Final EIR did not adequately address impacts to surrounding residences. As addressed in the Final EIR Response to Comments G14, G16 and G18, Ethanac Road is currently a truck route. A global Traffic Study for the Menifee Economic Development Corridor (MEDC) area, including the addition of a truck corridor south of Ethanac Road, is currently being prepared in coordination with the City of Menifee and the City of Perris. Any improvements to portions of intersections or roadways shared with the City of Perris would be coordinated between the City of Menifee and City of Perris prior to final engineering for the Project.
- A-5** The City of Perris states that the City of Menifee did not adequately address the City of Perris' concerns expressed in the Project's Notice of Preparation (NOP) scoping process, Draft EIR public review period, and following the Final EIR, but does not provide further detailed information why their concerns were not adequately addressed. No further response is warranted. Additionally, the City of Menifee believes all previous responses to Perris's Draft EIR comment letter were thorough and adequate.
- A-6** This comment reiterates that the City of Perris' letter constitutes an appeal of the Planning Commission's approval of the Project but does not raise any specific deficiencies. Please refer to the following Responses to Comments A-7 through A-64 prepared in response to the City of Perris' comments.
- A-7** This comment states that the City of Perris provided comments dated April 26 and August 14 on the Draft EIR's Project Description. This comment is acknowledged, and the City of Menifee responded to all comments on the Draft EIR - see Response to Comments G3 through G7 in the Final EIR that were prepared in response to the City of Perris' comment on the Project Description

being inadequate. This comment does not provide any evidence how the Final EIR failed to address their comments or is an inadequate environmental document pursuant to the CEQA.

- A-8** The Project Traffic Study recommended that the intersection of Wheat Street at Ethanac Road (intersection #9) is anticipated to be right-in-right-out (RIRO) access. With this improvement, the intersection operates at an acceptable LOS and a traffic signal is not warranted. Therefore, no other improvements were recommended at intersection #9. Also, the Traffic Study recommended that a traffic signal be installed at the intersection of Ethanac Road at Byers Road (intersection #10). The recommended improvements for intersection #9 and intersection #10 were imposed on the Project as conditions of approval by the Planning Commission (see Condition of Approval 209).

Pursuant to CEQA Guidelines Section 15124, a Project Description should not supply extensive detail beyond that needed for evaluation and review of the environmental impact. Because the off-site improvements associated with the proposed Project do not involve significant construction that would impact any of the analyses or conclusions in the EIR, mention of off-site improvements is not required to be included in the Project Description. The off-site improvements associated with the proposed Project are not considered intensive construction work that would expand the scope of project construction impacts already discussed thoroughly in the Draft EIR.

- A-9** Because the improvement of a 350-foot westbound left-turn lane at the intersection of Ethanac Road and Byers Road does not involve significant construction that would impact any of the analyses or conclusions in the EIR, mention of this off-site improvement is not required to be included in the Project Description. The comment incorrectly assumes that off-site impacts were not evaluated but does not provide any substantial evidence to support this claim. The impacts of project construction, include roadway improvements (i.e. noise, air quality, etc.), were included in the assumptions underlying the technical studies. The City explained in its Responses to Comments in the FEIR (G18 and G21) that there would be no operational/roadway geometric hazards caused by the 350 foot westbound left-turn lane. As such, the DEIR and FEIR adequately incorporated the 350-foot westbound left-turn lane at the intersection of Ethanac Road at Byers Road and all impacts associated therewith.

- A-10** See Responses to Comments A-8 and A-9.

- A-11** See Response A-9. As noted in Final EIR Response to Comment G7, the analysis included in the Draft EIR concerning this proposed improvement was provided for informational purposes only for the City's use in evaluating the Project and considering conditions of approval outside of CEQA's framework. The implementation of this improvement would be based on direct discussion between City staff and the Applicant and would be imposed via the Conditions of Approval process, not through CEQA. Nevertheless, any improvements to portions of intersections or roadways shared with the City of Perris would be coordinated between the City of Menifee and City of Perris prior to final offsite engineering for the Project. Additionally, the improvements associated with the proposed Project are not considered intensive construction work that would expand the scope of Project construction impacts already discussed thoroughly in the Draft EIR.

- A-12** The comment incorrectly assumes that off-site impacts were not evaluated but does not provide any substantial evidence to support this claim. Page 2-3 of the Draft EIR describes the Project site

as 40.03 gross acres. However, CalEEMod output files in Appendix B1 and Appendix G, show that a total of 43.42 acres of development were analyzed as part of air quality and greenhouse gas assessments. The additional acres were included in the analysis under “other asphalt surfaces” to capture construction emissions associated with offsite roadway and infrastructure improvements. As a result, all potential offsite impacts including air quality impacts, energy use, and greenhouse gas emissions were evaluated in the Draft EIR.

- A-13** The Project includes an early-suppression fast-response (EFSR) fire sprinkler system and will use an electric or diesel-powered fire pump to provide additional water pressure. If an electric fire pump is installed, in the event that the building loses electricity, power for the electric fire pump will be provided by the emergency backup generator. As noted on page 4.2-17 and page 4.7-21 of the Draft EIR, emissions from emergency backup generators are included in the operational air quality and GHG analysis of the Project. The comment therefore incorrectly indicates that emergency fire water pump emissions are not addressed, as these emissions are addressed by the backup generator emissions in the Draft EIR.

However, diesel fuel consumption from the generator was not included in the energy analysis. Conservatively assuming the emergency generator is tested for one hour per week as modeled in the air quality and GHG sections of the EIR instead of the half hour per week as required, the generator would consume 1,970 gallons of diesel per year. This would increase diesel fuel consumption by 0.99 percent, increasing from 199,539 gallons to 201,509 gallons per year. Due to the small increase in diesel consumption associated with the operation of the generator, the percentage increase of diesel fuel in Riverside County, associated with the Project would remain 0.08 percent as identified in **Table 4.5-4: Project Annual Energy Use During Operations** of the Draft EIR and impacts associated with energy would remain the same.

- A-14** The commenter notes that diesel powered fire pumps must be tested on a weekly basis for a minimum of 30 minutes. Conservatively, the analysis for this Project assumed that diesel generators would operate for one hour every week and included those emissions in Table 4.2-9 and 4.2-10 of the Air Quality Section and Table 4.7-3 of the GHG Section of the Draft EIR. Therefore, the Draft EIR analysis conservatively overestimates the contribution from stationary diesel emissions sources by assuming one hour of testing rather than 30 minutes of testing.

- A-15** Refer to Responses A-13 and A-14. No further response is warranted.

- A-16** Refer to Responses A-13, A-14, and A-15 above. All analysis and technical studies for the Draft EIR have been prepared following the appropriate methodologies. All potential impacts have been addressed.

- A-17** The City of Perris prior comment letters raised concerns regarding traffic safety hazards due to queuing on Ethanac Road at Byers Road that will be constructed by the Project (G-18, G-21), the configuration of Barnett Road and Case Road (G-25), and queuing along Ethanac Road at the I-215 interchange (G-31). See Responses to Comments G-18, G-21, G-25, and G-31 in the Final EIR how the Project will not create safety hazards due to geometric design.

In addition, Ethanac is generally a straight and flat road, with good visibility, no visual obstructions, and no sharp curves. It should also be noted that the Project would add only eastbound and

westbound through traffic at the intersection of Ethanac Road at Barnett Road/Case Road; therefore, the project would not impact or worsen the potential issue of the northbound/southbound offset between Barnett Road and Case Road. Further, based on the Project Traffic Study, the intersection of Ethanac Road at Barnett Road/Case Road does not decline to an unacceptable Level of Service with the addition of Project traffic. Therefore, the City of Perris' reliance on LOS/queuing analysis to prove a safety impact at the intersection of Ethanac Road at Barnett Road/Case Road has no support.

Also, queuing progression and congestion does not automatically mean there is a safety hazard. As such, for the reasons noted above in this response, there is no evidence that those occurrences will create safety hazards in this case and the City of Perris has not provided any evidence to the contrary.

It should be noted that the Project will be directly constructing several of the Traffic Study's recommended improvements (imposed as conditions of approval by the Planning Commission), including constructing a traffic light and the 350' turn pocket on Ethanac Road at Byers Road, modifying Wheat Street at Ethanac Road to a right-in, right-out (RIRO) only access, adding a traffic signal at the intersection of Ethanac Road at Evans Road, as well as adding turn lanes and road widening. These improvements will further improve safety conditions in the study area and would not create hazards due to geometric design features.

**A-18** Ethanac Road is currently a truck route. A global Traffic Study for the Menifee Economic Development Corridor (MEDC) and surrounding area, including the possible addition of a truck corridor south of Ethanac Road, is currently being prepared in coordination with the City of Menifee and the City of Perris. However, the global Traffic Study has not been completed nor has any roadway other than Ethanac Road been designated as a truck route that can serve the Project, and thus this Project cannot speculate on or study alternative trucks routes that may or may not later be identified. Therefore, it is appropriate that the Project Traffic Study analyzes trucks utilizing Ethanac Road to determine recommended improvements along Ethanac Road at full buildout of the MEDC and surrounding area.

Based on discussion with City of Perris staff, it is understood that the Traffic Impact Analysis prepared by RK Engineering in June 2023 is in reference to a supplemental queuing analysis conducted by RK Engineering along Ethanac Road at the intersection of Ethanac Road at Barnett Road/Case Road as part of an Comment Letter in support of Appeal, prepared by the City of Perris, for the Ethanac and Barnett Development Project in the City of Menifee. As noted in Response to Comment A-17, Ethanac is generally a straight and flat road, with good visibility, no visual obstructions, and no sharp curves. The Project would add only eastbound and westbound through traffic at the intersection of Ethanac Road at Barnett Road/Case Road; therefore, the project would not impact or worsen the potential issue of the northbound/southbound offset between Barnett Road and Case Road. Therefore, the City of Perris' reliance on a queuing analysis to prove a safety impact caused by the Project at the intersection of Ethanac Road at Barnett Road/Case Road has no support.

**A-19** Refer to Response to Comment G-17 in the Final EIR regarding review of compliance with the City of Perris Level of Service standards and significance criteria for study intersections located entirely or a majority within the City of Perris. As Level of Service is no longer a CEQA threshold for

transportation impacts, the analysis to confirm compliance with the City of Perris Level of Service standards and significance criteria was not included in the DEIR.

The City of Perris General Plan Circulation Element does not provide traffic safety impact criteria relevant to the Project and the City of Perris did not provide enough specifics in their comment to evaluate this comment further.

- A-20** The City of Menifee has responded to all comments raised by City of Perris regarding traffic safety hazards due to a geometric design feature. Refer to Response to Comment A-17. No further response is warranted. For impacts related to air quality and noise, refer to Response to Comment A-12.
- A-21** Refer to Response to Comment A-17. No further response is warranted.
- A-22** Refer to Response to Comment A-17. No further response is warranted.
- A-23** Refer to Response to Comment A-17. No further response is warranted.
- A-24** Refer to Response to Comment A-17. No further response is warranted.
- A-25** Refer to Response to Comment A-17. No further response is warranted.
- A-26** Refer to Response to Comment A-17. No further response is warranted.
- A-27** Ethanac Road is currently a truck route. A global Traffic Study for the Menifee Economic Development Corridor (MEDC) and surrounding area, including the possible addition of a truck corridor south of Ethanac Road, is currently being prepared in coordination with the City of Menifee and the City of Perris. However, the global Traffic Study has not been completed nor has any roadway other than Ethanac been designated as a truck route that can serve the Project, and thus this Project cannot speculate on or study alternative trucks routes that may or may not later be identified. Therefore, it is appropriate that the Project Traffic Study analyzes trucks utilizing Ethanac Road to determine recommended improvements along Ethanac Road at full buildout of the MEDC and surrounding area. Additionally, there is no reason to include a failure analysis as part of the global Traffic Study.
- A-28** The February 2023 traffic counts for overlapping intersections in the Project Traffic Study are provided in Attachment B to this Response to Comment matrix. Based on comparison of the February 2023 volumes and the October 2021 volumes used in the Project Traffic Study, it is noted that, compared to February 2023 volumes, the October 2021 volumes are higher at the intersections of Ethanac Road at I-215 SB Ramps (Intersection #14) and Ethanac Road at I-215 NB Ramps (Intersection #15), as well as lower at the intersection of Murrieta Road at Ethanac Road (Intersection #11). The variance in existing volumes between the October 2021 and February 2023 at the three noted locations are within 10%. As such, the traffic counts in the Project Traffic Study are considered reasonable, as well as conservative in some locations as noted above.
- A-29** The City of Fontana Truck Trip Generation Study is not considered outdated in the industry and is widely accepted and used by many cities in the Inland Empire, including as noted in the City of Menifee LOS Traffic Study Guidelines (October 2020), as a method for obtaining truck trips and truck splits. Further, the truck mix in the Fontana Truck Trip Generation Study is comparable to

the SCAQMD truck mix recommendations. Also, as noted in the Project Traffic Study, the passenger car/truck splits are based on the ITE Trip Generation Manual (10th Edition Supplement), which is comparable to the passenger car/truck splits in the ITE Trip Generation Manual (11th Edition). Nevertheless, in order to address this comment, the passenger car/truck split and truck mix for the proposed Project have been reviewed based on the ITE Trip Generation Manual (11th Edition) for the passenger car/truck splits and the SCAQMD Warehouse Truck Trip Study Data Results and Usage (dated July 17, 2014) for the truck mix (i.e. 2-axle, 3-axle, 4+axle trucks) . A copy of the noted resources is provided in Attachment A (Passenger Car/Truck Splits and Truck Mix Information) to this response matrix.

The passenger car equivalent (PCE) factors as noted in the Traffic Study were also applied to these trip generation estimates. Based on the methodology noted above, the Project is estimated to generate approximately 4,719 daily PCE trips, with 632 PCE trips (512 inbound and 120 outbound) in the morning peak hour and 860 PCE trips (335 inbound and 525 outbound) in the evening peak hour.

Compared to the trip estimates in the approved Traffic Study, the trip estimates based on the SCAQMD methodology (inclusive of ITE 11th Edition for the passenger car/truck splits) is estimated to generate 3 additional daily PCE trips, with 7 fewer PCE trips in the morning peak hour and 19 fewer PCE trips in the evening peak hour.

Accordingly, as described above, the use of ITE 11th Edition passenger car/truck splits and SCAQMD truck mix percentages would not change the significance determinations in the Draft EIR and would not require new or modified mitigation measures. Therefore, the Final EIR and approved Traffic Study are not flawed and do not need to be modified.

- A-30** Refer to Response to Comment A-29. No further response is warranted.
- A-31** Refer to Response to Comment A-29. No further response is warranted.
- A-32** The study intersections in the Project's Traffic Study are based on the Traffic Scoping Agreement approved by the City of Menifee. The intersection of Green Valley Parkway and Ethanac Road was not part of the approved list of study intersections as it is a future intersection that does not provide direct access to the Project. It should also be noted that the Project would add only eastbound and westbound through traffic on Ethanac Road at the future intersection of Green Valley Parkway and Ethanac Road and would therefore not directly impact the Green Valley Parkway approach at the future intersection.
- A-33** Acknowledged. At the time of data collection (October 2021), the southbound approach for Intersection #11 (Murrieta Road at Ethanac Road) reflected one dedicated left-turn lane, one through lane, and one dedicated right-turn lane. As a result, the existing lane geometry was reflected as such in the Project Traffic Study. Based on review of applying the updated lane geometry to Intersection #11 under Opening Year 2024 Cumulative Plus Project conditions, the overall intersection delay for Intersection #11 would nominally increase as noted below:
- AM Peak Hour
    - 2021 SB Approach: 119.3 sec/vehicle
    - Current SB Approach: 120.3 sec/vehicle

- PM Peak Hour
  - 2021 SB Approach: 543.1 sec/vehicle
  - Current SB Approach: 550.4 sec/vehicle

Intersection analysis worksheets for Intersection #11 under Opening Year Cumulative Plus Project conditions is provided as an Attachment to this Response to Comment matrix. As noted above, the lane geometry update to the SB approach of Intersection #11 would not change the recommended improvements at Intersection #11. With the noted recommended improvements in the Project Traffic Study, Intersection #11 would operate at an acceptable LOS.

**A-34** The walk and pedestrian clearance time is accounted for in the Vistro traffic modeling software based on standard HCM defaults for walk time (4-7 seconds) and pedestrian crossing speed (3.5 feet per second).

**A-35** The walk and pedestrian clearance time is accounted for in the Vistro traffic modeling software based on standard HCM defaults for walk time (4-7 seconds) and pedestrian crossing speed (3.5 feet per second). The City of Menifee has responded to all comments raised by City of Perris regarding traffic safety hazards due to a geometric design feature. Refer to Response A-17. No further response is warranted.

**A-36** A separate signalized intersection typically has its own traffic signal cabinet, which is located on a corner of the intersection to which the signal cabinet is connected to. The traffic signal cabinet assigns phasing, signal timing, and cycle length that direct the operation of the individual traffic signal. In the case of the intersection of Ethanac Road at Barnett Road/Case Road, there is only one traffic signal cabinet located south of Ethanac Road between the two offset legs of the intersection. As such, while the northbound and southbound approaches are offset, the intersection operates as one signalized intersection that has connected phasing, signal timing, and cycle length. As a result, the intersection of Barnett Road/Case Road at Ethanac Road operates as one intersection and should be analyzed as one for analysis purposes. The comment suggests that the offset nature of Barnett Road and Case Road (the north/south roads at this intersection) causes a safety hazard and that the Project will exacerbate those issues. It should be noted that the Project does not take direct access from Barnett Road and would add only eastbound and westbound through traffic on Ethanac Road at the intersection of Ethanac Road at Barnett Road/Case Road. Therefore, the Project would not directly impact the turn pockets at the intersection and would not create or exacerbate turning hazards due to geometric design features.

**A-37** The analysis does account for the “no right-turn on red” sign. In the traffic analysis model used for the Project Traffic Study, there is an input to indicate vehicles making a right turn on red, which typically would lower the overall delay of the intersection. As a conservative analysis in the Project Traffic Study, this input was not selected and no "right turn on red" vehicles were assumed on any of the approaches at the Intersection #13 (Barnett Road/Case Road at Ethanac Road).

**A-38** It should be noted that the Project would only add eastbound and westbound through traffic at the intersection of Barnett Road/Case Road at Ethanac Road. Therefore, the Project would not directly impact the turn pockets or turning movement at the intersection and thus would not create or exacerbate turning hazards due to geometric design features at this intersection.

Further, based on review of the SWITRS data noted in the Comment from 2015-2017, there were three rear-end collisions for vehicles traveling eastbound or westbound at the intersection. Generally, improvements are recommended based on accident data for safety purposes if there are at least five accidents that are similar in nature (i.e. rear end) within a consecutive 12-month period where the accident could be mitigated with a geometric improvement (California Manual on Uniform Traffic Control Devices, CA MUTCD). Based on review of the SWITRS data noted above and the TIMS data reference in the Comment from 2020-2023, there is not at least five accidents that are similar in nature within a consecutive 12-month period that would be caused or enhanced by the addition of eastbound and westbound through Project traffic at the intersection of Barnett Road/Case Road at Ethanac Road (Intersection #13). Therefore, no improvements are required of the Project at this intersection and the Project would not create hazards due to geometric design features.

- A-39** Refer to Response to Comment A-36. No further response is warranted.
- A-40** It is noted that the overall intersection delay improves with the addition of Project traffic under Existing Plus Project conditions at Intersection #6 (SR-74 at Sherman Road), Intersection #7 (Goetz Road at Fieldstone Drive), Intersection #13 (Barnett Road/Case Road at Ethanac Road), and at Intersection #23 (Sun City Boulevard at McCall Boulevard). Delay at signalized intersections is calculated based on the overall average of delay on each approach. The decrease in overall average delay for the noted intersections is due to the addition of Project traffic to an approach with a lower delay than the other approaches, which brings the overall average of all delay down for the intersection.
- A-41** See Response to Comment A-36. Based on the Project Traffic Study, the intersection of Barnett Road/Case Road at Ethanac Road (Intersection #13) would operate at an acceptable LOS under Opening Year 2024 Cumulative Plus Project conditions. Therefore, no improvements are recommended at this study intersection in the Project Traffic Study. The Project Traffic Study only provides recommended improvements to study intersections and roadway segments that would cause the deficient study locations to operate at an acceptable LOS and would more than offset the Project-related effect.
- A-42** The Project Traffic Study only provides recommended improvements to study intersections and roadway segments that would cause the deficient study locations to operate at an acceptable LOS and would more than offset the Project-related effect. The implementation of improvements is based on direct discussion between City staff and the Applicant via the Conditions of Approval process. Condition of Approval 209 for the proposed Project notes that the Project is conditioned to construct all improvements recommended in the Project Traffic Study for the following intersections:
- #9 - Wheat Street at Ethanac Road
  - #10 - Byers Road at Ethanac Road
  - #12 - Evans Road at Ethanac Road

Based on Table 4 of the Project Traffic Study, the intersection of I-215 NB Ramps at Ethanac Road (#15) would have a direct project effect. Due to the regional nature and scope of Intersection #15 as part of the Ethanac Road/I-215 interchange, the Project will be contributing a fair-share

payment per Condition of Approval #212, instead of directly constructing improvements. It should be noted that the Ethanac Road/I-215 interchange has been identified as a Western Riverside Council of Governments (WRCOG) Transportation Uniform Mitigation Fee (TUMF) project. Therefore, the Project's payment of TUMF fees will cover additional costs to TUMF projects, such as the Ethanac Road/I-215 interchange. Nevertheless, the recommended improvements to deficient study locations are to address automobile delay, which are no longer CEQA impacts and therefore, not required improvements to mitigate CEQA-related impacts. **A-43** Refer to Response A-42. No further response is warranted.

**A-44** Refer to Response A12 regarding offsite improvements. Refer to Response A14 regarding the testing of diesel-powered fire pumps and/or diesel generators.

**A-45** The commenter notes that the Greenhouse Gas Emissions Assessment used CalEEMod version 2020.4 and acknowledges that SCAQMD recommended that all air quality analyses conducted after December 21, 2022 use the latest version of CalEEMod. Consistent with SCAQMD's recommendations, the air quality and greenhouse gas modeling for the Project was initially completed in August 2022 with additional modeling completed in October 2022 to incorporate mitigation required by the Health Risk Assessment (HRA). Therefore, all modeling for the Project was completed before CalEEMod 2022 was approved for full release. As a result, CalEEMod version 2020.4 was the latest available software at the time the analysis was conducted.

**A-46** Refer to Response A-12.

**A-47** **MM AQ-3** requires the Project operator to submit a TDM program to the City. This measure provides employees with information regarding the use of public transportation, carpooling/vanpooling, and walking or biking to work, rather than driving to work every day. The development and submission of this plan is the performance standard for this mitigation measure, as the Project cannot compel employees not to drive their own vehicles to work. As a result, it is not possible to require an absolute VMT reduction as a mitigation target, however TDM programs are commonly used in the industry and are supported by CAPCOA,<sup>1</sup> CARB,<sup>2</sup> SCAQMD,<sup>3</sup> and SCAG<sup>4</sup> as a VMT (and thus air quality and GHG) reduction strategy. The commenter implies that this mitigation measure is the main source of NO<sub>x</sub> reductions that reduced emission to less than significant levels, however CalEEMod only took credit for 0.3 percent reduction of NO<sub>x</sub> emissions associated with **MM AQ-3**. Although not acknowledged by the commenter, **MM AQ-4**, which requires all cargo handling equipment to be zero emissions, is the main source of NO<sub>x</sub> emission reduction which resulted in less than significant levels.

**A-48** As discussed in Response A-12, the CalEEMod modeling for the Project included an additional 3.39 acres to conservatively include all offsite improvements associated with the Project. CalEEMod provides a list of typical construction equipment based on the size of the Project site and the types of land uses proposed. As a result, all construction equipment necessary for the offsite

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<sup>1</sup> California Air Pollution Control Officers Association. page 76.

[https://www.airquality.org/ClimateChange/Documents/Handbook%20Public%20Draft\\_2021-Aug.pdf](https://www.airquality.org/ClimateChange/Documents/Handbook%20Public%20Draft_2021-Aug.pdf)

<sup>2</sup> California Air Resources Board. page 100. <https://ww2.arb.ca.gov/sites/default/files/2019-11/Final%20SCS%20Program%20and%20Evaluation%20Guidelines%20Appendices.pdf>

<sup>3</sup> South Coast AQMD. page 4-52. <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/07-ch4.pdf?sfvrsn=6>

<sup>4</sup> Southern California Association of Governments. <https://scag.ca.gov/TDM>

improvements identified in the Traffic Study, located in Appendix K of the Draft EIR, have been included in the construction noise model. As shown in **Table 4.11-9: Project Construction Noise Levels** of the Draft EIR, construction noise would not exceed noise thresholds and therefore would not result in a significant noise impact.

**A-49** The commenter seems to suggest that the cumulative noise threshold used in the analysis was not correct but does not provide details regarding what threshold the commenter believes is appropriate. Cumulative noise impacts are discussed on pages 4.11-25 through 4.11-27 of the Draft EIR. As discussed in response **A-50** below, consistent with CEQA, a two-step process for determining cumulative noise impacts was used in the analysis.

**A-50** In accordance with CEQA Guidelines, the Draft EIR addresses the cumulative noise impacts by addressing the following two step process: (1) whether the effects of the Project combined with other projects are cumulatively significant and (2) whether the Project's incremental contribution to the impact is cumulatively considerable. Draft EIR **Table 4.11-13: Cumulative Off-Site Traffic Noise Levels** identifies both the combined and incremental noise increases.

Draft EIR **Table 4.11-13** shows the combined traffic noise levels of the Project and other future projects would increase noise levels over 3 dBA above existing conditions at two roadway segments on Ethanac Road, one between Wheat Street and Murrietta Road and the other between Murrieta Road and Evans Road. These two roadway segments satisfy the first step, in identifying cumulative impacts. Therefore, the Draft EIR identifies the cumulative impact. However, the Project's incremental contribution to these impacts is not cumulatively considerable as the incremental contribution must exceed 1.0 dBA to be considered significant. As shown in **Table 4.11-13**, the incremental increase associated with the Project at these roadway segments are 0.99 dBA and 0.72 dBA. As discussed previously, to be considered a cumulatively significant impact, an impact must satisfy both conditions of the two-step cumulative process. As shown in **Table 4.11-13**, none of the roadway segments satisfy both conditions, therefore the Project's incremental effect would not be cumulatively considerable, and the Project would not result in cumulatively significant impacts.

The comment incorrectly states that the Draft EIR does not identify a significant impact. As noted above, the Draft EIR identified the cumulative impact. However, the Draft EIR determines that this impact would not be cumulatively considerable and therefore not significant.

**A-51** As stated in Final EIR Response to Comment G10, CEQA Guidelines Section 15126.6 requires that a project provide a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. The City deemed that, for this Project, having two alternatives for the Project provides an adequate range of alternatives pursuant to CEQA Guidelines Section 15126.6, because those were the alternatives determined which could reduce the Project's significant effects while still meeting most of the basic Project objectives.

**A-52** Refer to Response to Comment A-51 above.

- A-53** This comment is a conclusion of the City of Perris' appeal letter and does not raise any substantive issues. No further response is warranted.
- A-54** This comment is an attachment of the City of Perris' letter submitted to the City of Menifee containing initial comments on December 22, 2021. Those initial comments were addressed in the Draft EIR. No further response is warranted.
- A-55** This comment is an attachment of the City of Perris' letter submitted to the City of Menifee on the NOP on May 16, 2022. The comments on the NOP were taken into consideration and incorporated as appropriate into the Draft EIR. No further response is warranted.
- A-56** This comment is an attachment of the City of Perris' letter submitted to the City of Menifee during the public review period of the Draft EIR on April 26, 2024. This letter was fully responded to as part of the Final EIR for the project dated August 2024. No further response is warranted.
- A-57** Refer to Response to Comment A-54 above.
- A-58** Refer to Response to Comment A-55 above.
- A-59** This comment is an attachment of the City of Perris' letter submitted to the City of Menifee in consideration of the Final EIR approval by City of Menifee Planning Commission on August 14, 2024. No further response is warranted.
- A-60** The City of Perris's email correspondence with the City of Menifee from June 11, 2024 has been noted and no further response is warranted.
- A-61** Refer to Response to Comment A-54 above.
- A-62** Refer to Response to Comment A-55 above.
- A-63** Refer to Response to Comment A-56 above.
- A-64** Refer to Response to Comment A-56 above. The comment also includes FEIR Responses to Comments to the City of Perris' letter. No further response is warranted.